

## Responsible Marketing and Communication – Key Principles

In our digital world, commercial communication and advertising can appear in many different ways and through many different platforms, from online ads to social media, from television to mobile, and from internet of things to AI applications. These Responsible Marketing Key Principles are applied to all forms of commercial communication delivered by Publicis Groupe agencies everywhere.

These Key Principles are universal, content and technology neutral. They are aligned with the global Advertising and Marketing Communications Code, established by ICC (International Chamber of Commerce), which are regularly revised through a collegial and international work stream with all stakeholders from the industry and applicable to everyone in the marketing eco-system.

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### I – 10 General Key-principles

1. ALL marketing communication have to be **legal, decent, honest, and truthful**. Without any exceptions.
2. Marketing communications have to **respect human dignity, prohibit all form of discrimination** (such as gender, age, ethnic origin, disability, religion or sexual orientation...) and **incorporate social responsibility**.
3. Descriptions, claims or illustrations should be capable of **substantiation**.
4. Value of the product or service and pricing promoted in commercial or marketing communication have to be **clear for the consumer**, including terms of access or usage.
5. Marketing communications should be **clearly distinguishable** from other types of communication, whatever the medium or digital channel used. Advertisements including “native advertisements” have to be readily recognizable and labelled. The true commercial purpose should be **transparent and not disguised** as, for example: market research, consumer surveys, independent content, testimonials or endorsements, whether by blog, video channel, private posting on social media, etc.
6. The **identity of the marketer**, brand, product or service has to be very clear.
7. All marketing communications have to respect the rules applicable for **children** (under 12) and **teens** (between 13 to 17). The content should be clearly distinguishable.
8. When **personal data** is collected from consumers or users and regulated by national or other authorities, individuals concerned have to be clearly aware of the purpose of the collection and of any intention to transfer the data to a third party for marketing purposes is compliance with laws. Publicis Groupe agencies apply rigorous standards as applicable related to the use of data, processing, security and privacy, aligned with global regulation such as GDPR (EU General Data Protection Regulation Directive) or other law. See also Publicis Groupe data protection policy.
9. Appropriate measures have to be in place **to ensure consumers understand and exercise their rights** such as: opt-out option of direct marketing lists, opt-out of OBA or IBA (Online Behavioral or Interest-Based Advertising), rectify personal data, require their personal data to not be made available to certain third parties, sign on general direct preference services, as applicable.
10. **The wish to not receive** marketing communications using a specific medium have to be **respected without any exception**. The Groupe is a defender of the principle freedom of will and freedom of choice.



## II – Political and partisan campaigns

### **The Groupe refusal to engage in partisan campaigns**

“We believe in fairness. Although we are always ready to place our talent for communication at the disposal of advertisers, the community, and the public interest through NGOs, we **refuse** to work for any political party, sect or organization spreading ideological propaganda.”  
(from Janus, in Publicis Values)

### **Lobbying activities**

Some client assignments may involve lobbying and strategies to influence decision-makers on their behalf. Transparency is the driver of the way for doing it. Lobbying experts must comply with the 10 General Key Principles listed here, and act with transparency criteria in relation to their clients and other stakeholders. The objectives targeted, and the actions carried out must be done with integrity, in accordance with laws and applicable best practices, and the Groupe’s internal rules. The teams involved are clearly identified, for example, in the Transparency Register of the European Parliament and the European Commission, or on a country-wide basis such as the digital repertoire of representatives of interests managed by the High Authority for the Transparency of Public Life in France (HATVP), or in the United States where the rules of the Lobbying Disclosure Act are applied and are aligned with the registration of the subjects and organizations concerned.

All employees are required to sign a Conflict of interest disclosure statement, on an annual basis.

Publicis Groupe does not do any lobbying on its own behalf.

## III – Key-rules for UGC - User Generated Content

Direct interactions between the brands and their customers is a central component for a dynamic marketing plan. Engaging consumers to share their experience, stories and content through various forms is a decisive metric. To establish a real connection with audiences across different social media platforms, reciprocal trust is the key-component for success. From the marketer side, general key-principles are:

- **Transparency** about content sources, particularly when influencers are engaged by brands,
- **Authenticity** by respecting the creation and content coming from users without transforming it (veracity, ownership, intellectual property...),
- **Privacy** rights around UGC data collection have to respect international rules (such as EU Directive GDPR or CCPA) and local legal regulations – read also [Publicis Groupe Data Protection policy](#),
- **Clarity** of the moderation rules is necessary; keeping human moderators in all programs is a key-success factor. Banning fake and false stories in all forms is a prerequisite.
- **Safety** for the brands is essential; Publicis Groupe agencies are working with third-party ad verification organizations regarding content level granularity or depth of measurement and reporting.

MRC Supplement to IAB Guidelines for the Conduct of Ad Verification is the relevant framework.



#### **IV – Eco-conception in marketing and communication**

In a climate emergency requiring sustainable consumption, and aligned with the Publicis Groupe Environmental Policy, agencies are taking into account all environmental impacts related to their direct work, from

- *Use of raw materials and natural resources to limit the environmental and biodiversity impacts,*
- *Energy consumption and energy sourcing, with a clear preference for renewable sources,*
- *Production mode, from A to Z, associating suppliers and business partners to find the less impactful solution,*
- *Recycling, waste management and end of life.*

To assess each project, the Groupe developed a dedicated proprietary tool **A.L.I.C.E** (Advertising Limiting Impacts & Carbon Emissions) helping the teams to evaluate the project's impacts and its life cycle, and to find alternative solutions.

Publicis Groupe agencies are promoting sustainable approaches and applying sustainable, environmentally friendly technologies. This is done with our clients based on our recommendation and their final choice, and with our suppliers and business partners on a project basis.

**A.L.I.C.E** has been developed in conjunction with Bureau Veritas for all of the calculations and to ensure the robustness of the approach and data, particularly if carbon compensation will be done. After being tested on a number of campaigns and projects, a global deployment will start in 2020.

In 2009, the Groupe shared across employees and the organization a clear statement established with the Creative Directors and the Strategic Planners to **banish greenwashing** in claims and marketing campaigns. With the same objective, **social washing is also banned**. The goal of our work is to promote sustainability with tangible positions.

#### **V – Publicis Groupe Verified**

Verified is Publicis Groupe's proprietary certification process **for AdTech vendors** to ensure they meet the highest industry leading standards across display, video, mobile, emerging, and social programmatic media. This Groupe evaluation process has been in existence for more than 10 years. Verified is inclusive of 14 AdTech categories: Ad Server, Attribution Partners, Brand Safety, Cross Device, DooH, Data, Data Onboarders, DCO, DMP, DSP, Search, Social, Supply and TV attribution.

The team uses a **7 step, multi-pronged evaluation process** that involves several levels of vendor interviews, product demonstrations, RFI and testing prior to being granted the Verified Technology approval. The process takes approximately two months from start to finish. It could vary by technology category but includes up to **1,200 questions** that evaluates the nuances of technology, the business, processes across billing, finance, reporting and more; this process provides a robust Scorecard.

The Publicis Groupe Verified team continues to re-evaluate vendors on an annual basis to align with the changes in the marketplace and client needs, which creates an incentive for vendors to enhance and/or improve upon their offerings. The goal is to raise the bar of the existing industry standards and to provide a relevant, accurate and detailed analysis to our clients.

#### **TAAG – Technology and Activation Group**

This is a Publicis Groupe internal organization running 24/7 composed of a network of dedicated Ad Tech Experts – regularly trained and certified, they are able to address and assess all technology platforms, to align them under a global taxonomy using robust and standardized processes.



## **VI – Algorithms, machine or deep learning, AI (Artificial Intelligence)**

Publicis Groupe is an active player to promote inclusive and secured algorithms, to preserve final user freedom and privacy. This is a key-element of the Groupe strategy on marketing and business transformation offer to its clients. The key-principles are the following:

- **Fair and Inclusive for All:** “Inclusive by design” principle is applied to fight against bias in all the steps and to ensure a human-centric approach on AI. A diverse knowledge and perspective are an imperative need for a successful product to never harm anyone.
- **Reliability & Safety:** critical review is part of the process to ensure clarity and comprehensiveness for every user.
- **Privacy & Security:** The principle “privacy by design” is applied to projects as it is outlined in [Publicis Groupe Data protection policy](#).
- **Transparency & Accountability:** monitoring performance is imperative to identify irregularities and continue to learn from all experiences.
- **“Tests & Tests”:** testing is the vital steps to ensure the project will comply with regulations and industry best practices, and to validate the efficiency of the campaign or solution.

## **VII – Publicis Groupe corporate and trade or industry engagements (examples)**

- Publicis Groupe is a member of **MRC – Media Rating Council**, whose goal is setting standards to secure users’ audience measurement that is valid, reliable and effective.
- Publicis Groupe is a member of **IAB – Interactive Advertising Bureau**, gathering hundreds of companies from media and technology to foster the digital economy and to find relevant solutions to the new challenges of the digital economy. It could cover many areas from technical standards to best practices, or professional development to expertise or diversity in the workforce to listening and answering to consumers’ threats and questions.
- Publicis Groupe is a founding partner of **Coalition for Better Ads**. Advertising helps support valuable free content, robust journalism and social connections across the internet. Consumers, however, are increasingly frustrated with ads that disrupt their experience, interrupt content and slow browsing. This coalition is focusing its work on developing new global standards for online advertising, addressing consumer’s expectations in the right way.
- Publicis Groupe is also a founding partner of **TAG – Truthworthy Accountability Advertising** focusing its daily attention and work on fighting against online piracy and promoting transparency, to ensure “brand safety” and to avoid brands appearing in inappropriate sites or digital solutions.
- Publicis Groupe CEO joined in 2017 the **Unstereotype Alliance**, gathering under the UN Women leadership, communications companies and advertisers, to work together to eradicate outdated gender stereotypes. In 2018, Publicis Groupe CEO signed the **WEP – Women Empowerment Principles** (UN Women – Global Compact) with its 7 key principles’ to empower women in the workplace, with a specific focus on principle 5 “*Implement enterprise development, supply chain and marketing practices that empower women*”.



- Publicis Groupe joined in 2019 the **Kering and LVMH Model's Charter**, with other companies and brands in order to improve models' working conditions and well-being; the Model's Charter is fixing age minimum (16, and clear work condition between 16 and 18), it is excluding small size (32 W / 42 M), it is taking into account physical and mental health, and it is providing help in case of inappropriate situations, just to name a few elements.
- Publicis Groupe is engaged in many national and international trade organizations to share best practices and to support self-regulation, as we believe in enhancing and preserving consumer trust. We encourage our agencies' leaders to participate in trade work with local bodies, as a source of third parties' and stakeholders' engagement and collaboration, also providing important feedback on our work.

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As an economic and social player of around 80 000 professionals and practitioners in the world, we apply these Responsible Marketing key-principles to all employees and business partners in the company sphere of influence. In case of non-respect of these principles or inadequate response, Publicis Groupe can take appropriate measures with immediate effect.