



## II. THE PUBLICIS WAY TO CONDUCT BUSINESS WITH INTEGRITY

# 6. RESPONSIBLE MARKETING

### WHY?

In today's digital landscape, commercial communication and advertising manifest in diverse formats and across multiple platforms, spanning from online advertisements and social media to television, mobile devices, the internet of things, and AI applications. Responsible Marketing is one of the three priorities of the current Groupe's multi-year CSR/ESG strategy. It represents a voluntary framework of best practices that goes beyond basic compliance with laws.

### FOR WHOM?

All employees and all Groupe activities, including Tech, Data, Consulting and Communication.

### WHAT?

The Responsible Marketing is universal, content and technology neutral. It is aligned with the global Advertising and Marketing Communications Code, established by ICC (International Chamber of Commerce), which constitutes the roots of the advertising self-regulation system.

### General Key Principles

The following **14 general key principles** must be applied by all agencies:

- 1. All marketing communications have to be legal, decent, honest, and truthful.** Local Legal teams are providing support to Business teams in order to ensure the work respects laws and regulations and to avoid legal risks.
- 2. Marketing communications should respect human dignity, exclude all forms of discrimination** (such as gender, age, ethnic origin, disability, religion or sexual orientation...) and **incorporate social responsibility.** Publicis Groupe is committed to the public international conventions of the United Nations, the OECD and the International Labor Organization Human Rights policies, and therefore its policies are designed to demonstrate this commitment.
- 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 must 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" should 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 should 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 Code of Ethics II.1 Data Privacy.
- 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 must be **respected without any exception.** The Groupe is a defender of the universal principles freedom of will and freedom of choice.
- 11. Respect for the confidentiality of client data and projects is a fundamental value.** It is required from **100% of employees,** in addition to the obligations undertaken by employees in their employment contract with the Groupe.

**12. Intellectual property**, whatever the type of creation or output, is also protected. Experts in trademark law or copyright or database law, within the legal teams, must be consulted well upstream of projects. Data protection and security specialists must also be solicited in all projects to ensure that these issues are addressed rigorously. PMX Digital team has set up an exclusive contract with WIPO (World Intellectual Property Organization) to identify and exclude sites that violate intellectual property.

**13.** With regard to **vulnerable audiences**: the Groupe defends and promotes the rules set out in the guide Marketing & Advertising to Children of the ICC (International Chamber of Commerce) on the specific responsibilities that brands and agencies must have with regard to children and adolescents, whether in terms of product categories to be promoted or communication techniques used. This code provides a **framework for communication intended for children** (under 12 years old) and **adolescents** (between 13 and 18 years old).

**14. Digital accessibility or e-accessibility**: for the past ten years, teams of digital accessibility experts have been involved in numerous projects, notably within Razorfish and Publicis Sapient. An Accessibility Center of Excellence was structured in 2022 around the dedicated team, with experts in many cities. Technology, digital platforms designed for clients must **meet the universal criteria issued by the W3C** (World Wide Web Consortium) in order to allow equal access to content, including for people with disabilities (visually impaired, blind, deaf, hearing-impaired, other types of physical difficulties, etc.) or with access difficulties.

## Ethics within the agencies

### • Political and partisan campaigns

The Groupe refuses 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 Groupe Values).

### • Lobbying practices

Some client assignments may involve lobbying and strategies to influence decision-makers on the client's behalf. Transparency and compliance with laws are the drivers of the way to approach lobbying assignments. Lobbying experts must comply with the 14 General Key Principles listed above, and act transparently in relation to their clients and other stakeholders. The lobbying objectives, and related actions must be done with integrity, honesty, clarity and fairness, in accordance with applicable law and regulation and with transparency for stakeholders, by following the best

practices and the Groupe's internal rules. Lobbying activities must **follow the Publicis' strict rules**:

- Employees should review the Janus Anti-Bribery & Anti-Corruption policy taking into consideration lobbying activities.
- Publicis Groupe typically does not do any lobbying on its own behalf.
- Publicis Groupe as a company participates in trade or business organizations with others, to promote relevant business topics and contribute to public debate with transparency and integrity.

### • Technology, Machine Learning & Artificial Intelligence

The use of artificial intelligence, or algorithms based on deep learning (also called machine learning), is already integrated into the Groupe's business lines.

The following **5 key principles** must be respected:

- 1 - Equity and inclusion**: By applying the "Inclusion by design" principle to combat unconscious bias and ensure a diversity of viewpoints in the team so as not to offend anyone.
- 2 - Reliability and security**: Critical review is part of the process of designing an IT program to ensure clarity and completeness for each user.
- 3 - Privacy protection and data security**: The "Privacy by design" principle is applied to these projects as described in the Publicis Groupe data protection policy.
- 4 - Transparency and accountability**: It is imperative to monitor performance to identify irregularities and continue to learn from all experiences.
- 5 - "Tests and trials"**: Tests are the crucial steps to ensure that the project complies with regulations and industry best practices, and to validate the effectiveness of the proposed campaign or technological solution.

See Code of Procedures I.8 Use of Artificial Intelligence.

### • Socialwashing and greenwashing

As early as 2009, Publicis Groupe's CEO shared a vision across the organization to eliminate **greenwashing** in advertising and marketing campaigns. Also, in keeping with our values, **socialwashing is banned**.

Our work should promote sustainability and inclusiveness and avoid outdated social representations. It should always be adequately substantiated. We want to encourage consumers' behavioral changes and transition to a low carbon world.

Employees must be informed and trained on Business Ethics and Responsible Marketing standards applied to their own activity and work.

## WHO?

Country and Business Unit CEOs.

Policy available to the public on the Groupe website.