



THE PUBLICIS WAY TO ...

# RESPONSIBLE MARKETING & COMMUNICATION POLICY

## WHY?

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. Responsible Marketing for Publicis Groupe is a voluntary framework of best practices that goes beyond basic compliance with laws.

## FOR WHOM?

All employees and all activities across countries.

## WHAT?

Responsible Marketing & Communication policy is universal, content and technology neutral. This policy 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.

### I - 10 General Key Principles

1. All marketing communications have to be **legal, decent, honest, and truthful**.
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 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 must be **respected without any exception**. The Groupe is a defender of the universal principles 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 Groupe Values)

## Lobbying activities

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 10 General Key Principles listed here, 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 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.

## III - Social and Green-washing ban

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 and always be adequately substantiated; we want to encourage consumers' behavioral changes and transition to a low carbon world.

## WHO?

Country and Business Units CEOs.

*(An Appendix providing activities and annual data is publicly available on the Groupe website/Library)*