

## Appendix Responsible Marketing & Communication

*Description of the activities related to the Janus policy application with examples and data*

### **I – Content of the Janus policy (reminder)**

#### **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 communication have to be **legal, decent, honest, and truthful**.
2. Marketing communications have to **respect human dignity, prohibit 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, ILO and the OECD 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 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 should be clearly aware of the purpose of the collection and of any intention of a company to transfer the data to a third-party advertising or marketing company for marketing purposes should be done in compliance with laws. Publicis Groupe requires its agencies to understand and 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 laws. For more information, see 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 to do 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, honesty, clarity and fairness, in accordance with laws and applicable regulations 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.*

*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.*

## III – Social and Green – washing ban

*In 2009, the Publicis Groupe CEO shared across employees and the organization a clear statement established with the Creative Directors and the Strategic Planners to **ban greenwashing** in claims and marketing campaigns. With the same objective, **social washing is also banned**.*

*The goal of our work is to promote inclusiveness and sustainability with tangible proofs and to avoid outdated social representations; we want to encourage consumer’s behavioral changes and transitioning to a low carbon world.*

### **WHO?**

*Country and Business Units CEOs.*

## II – 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, diversity, ownership, independence, intellectual property...),
- **Privacy** rights around UGC data collection have to respect international rules (such as EU Directive GDPR or CCPA in the US) 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.

### **III – Eco&Socio-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 and societal impacts related to their direct work, from

- *Prevent misrepresentation and stereotyping and promote inclusivity and diversity at large,*
- *Encourage and promote behaviors supporting inclusiveness and climate resiliency,*
- *Use of raw materials and natural resources to limit the environmental and biodiversity impacts,*
- *Energy consumption and energy sourcing, with a clear ask for renewable sources and to limit energy consumption,*
- *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 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. After being tested on a number of campaigns and projects, a global deployment started in 2021. The V3 (2023) contains a deeper screening analysis on the digital side components done by an independent third party (Resilio-Green IT) and data from 100 countries to better integrate the work done by Publicis Groupe international teams. For the media calculation, APIs with two start-ups Impact+ and Scope3 have been added to make available more data sources, and increase the granularity for digital media. **A.L.I.C.E is accessible to all Publicis Groupe employees.**

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### **IV – Publicis Groupe Verified**

Verified is Publicis Groupe's proprietary certification process, to ensure and monitor media ethics performance, **for media publishers, platforms and AdTech vendors**: they must 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.

Publicis Media teams are trained to recommend a safe media landscape to clients for their brands, products, and services, through indicators related to viewability and safety, audience measurement and inclusive environments, whether for global or local campaigns.

### **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.

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

Publicis Groupe is an active player in promoting inclusive and secured algorithms, to avoid social and cultural bias, and, to preserve final user human rights, fundamental freedoms and privacy.

This is a key-element of the Groupe strategy on marketing and business transformation offer to its clients. The 5 key-principles are the following:

1. **Fair and Inclusive A.I. for All:** “Inclusive by design” principle is applied to fight against bias in all the steps and to ensure a human-centric approach on A.I.. A diverse knowledge and perspective are an imperative need for a successful product to never harm anyone.
2. **Reliability & Safety:** critical review is part of the process to ensure clarity and comprehensiveness for every user.
3. **Privacy & Security:** The principle “Privacy by design” is applied to projects as it is outlined in [Publicis Groupe Data protection policy](#).
4. **Transparency & Accountability:** monitoring performance is imperative to identify irregularities and continue to learn from all experiences.
5. **“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.

### **VI – 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 – Trustworthy Accountability Group** 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*”.



- In 2018, Publicis Groupe joined **#FreeTheWork initiative**, to give real space to women filmmakers in advertising.
- 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 (32W/42M), 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 a founding member of **Ad Net Zero**, launched in the UK with peers and advertisers in 2020, to measure the carbon emissions from the industry, with the calculator AdGreen for production activities.
- 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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### **Publicis Groupe Whistleblowing System**

Employees, clients, business partners and suppliers, or any other third parties, may report a violation of the law or company policy on fraud, corruption, harassment, discrimination, or any other ethics concerns via the publicly accessible system at: [ethicsconcerns@publicisgroupe.com](mailto:ethicsconcerns@publicisgroupe.com). All alerts are screened by the Groupe Secretary General and treated with utmost care by the VP of Internal Audit. Whistleblower communication is protected by confidentiality and any form of retaliation. (Reporting Concerns policy is part of Publicis Groupe Code of Ethics, called Janus)

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As an economic and social player of +98 000 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.