



APPENDIX *RESPONSIBLE MARKETING POLICY*

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

I - Content of the Janus policy (reminder)

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 1.8 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.

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 – the PACTS – are:

- **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*,
- **Authenticity** by respecting the creation and content coming from users without transforming it (veracity, diversity, ownership, independence, intellectual property...),
- **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,
- **Transparency** about content sources, particularly when influencers are engaged by brands,

- **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. A.L.I.C.E. 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 Scope 3 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.**

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 **banish greenwashing** in claims and marketing campaigns. With the same objective, **social washing is also banned**.

We want to encourage consumer's behavioral changes and transitioning to a low carbon world.

IV – THE ONCE AND FOR ALL COALITION

Launched in 2021 at the initiative of Publicis Media US, this coalition is a consortium of more than 70 partners with clients, media, experts and professional organizations. The common objective is to build long-term relationships with media that are held by, and target, minorities or groups of under-represented populations. The challenge is to support these media partners, whose voice must be heard more widely, thanks to open source tools and best practices, enabling them to strengthen their economic strength with innovative content. Clients thus increased their investments with these media by 50%. In 2022 and 2023, Publicis Media has invested US\$30M in the program to support content creators and digital series. The goal of this work is to support inclusiveness with tangible and long-term efforts for the communities.

V – PUBLICIS GROUPE VERIFIED

Since 2011, 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.

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 external and publicly accessible platform at <https://publicis.whispli.com/lp/ethicsconcerns>. All alerts are treated with utmost care and confidentiality. Whistleblower communication is protected by any form of retaliation. (Reporting Concerns policy is part of Publicis Groupe Code of Ethics, called Janus)

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