

09. Export Controls and Sanctions Compliance

▶ **AT A GLANCE**

Publicis Groupe serves clients worldwide and must therefore comply with applicable regulations governing export controls and sanctions.

FOR WHOM?

All Countries and Business Units.

WHAT?

- Failure to comply with export controls and sanctions can result in penalties and reputational harm.
- Business Unit and Country CFOs must fully implement this policy and all local trade controls.

HOW?

Overview

- Trade regulations govern the cross-border trade of goods, services and technology.



They include:

- **Export control regulations** that impose requirements such as the need to obtain a license for the transfer of certain technology, software, commodities and goods.
- **Economic sanctions** that limit trade, financial transactions and travel.

- Certain export controls and sanctions may restrict the Groupe's ability to do business with certain countries, individuals, entities, banks, or in some industries or sectors of a country's economy.

Prohibited Countries

- Certain countries are subject to broad, comprehensive sanctions. As a result, Publicis does not do business with those countries, which

currently include North Korea, Cuba, Iran, Russia and the Russian-controlled territories of Ukraine. The most current list of prohibited countries can be found here.

- It is strictly prohibited to engage in any dealings, whether direct or indirect, with any individual, entity or bank domiciled in these countries without the prior written approval of the Groupe Secretary General.

At-Risk Countries

- Certain other countries, as set out here, may be subject to limited export controls or sanctions, and may be more likely to have individuals, entities or banks included on sanctions lists.
- Country CFOs must review the list of at-risk countries and contact the Groupe Legal and Compliance Office before entering into any new business in these countries.
- Employees may not seek to contravene this policy or applicable regulations governing export controls and sanctions by engaging a third party to take prohibited action on their behalf.
- Any questions regarding compliance with such regulations should be directed to your local Legal team or the Groupe Legal and Compliance Office.



For any questions, contact your local Legal or Compliance team, or the Groupe Compliance Office.

WHO?

Country CFOs are responsible for ensuring compliance with this policy and for reporting any dealings with or in countries subject to export controls and sanctions to the Groupe Legal and Compliance Office as part of the bi-annual sanctions survey.

Policy available to the public on the Groupe website.