

# 01. Confidential Information

## ▶ AT A GLANCE

- Publicis is committed to protecting confidential information under all circumstances.
- We may disclose client information only with written authorization from the client.
- Such disclosures must occur in compliance with our contractual obligations to clients.


## FOR WHOM?

All employees and those working on behalf of the Groupe.

## WHAT?

It is important to establish guidelines for Key Executives and Groupe employees who may have access to confidential information (i.e., information that is not in the public domain) about the Groupe, its operations, clients, partners, or suppliers.

## HOW?

 **In the normal course of business, clients, suppliers, and other partners may make confidential information available to Groupe employees.**

- Key Executives and all Groupe employees must not, under any circumstance, use such confidential information for their own personal interest or disclose it.
  - Confidential information may only be used for legitimate business purposes in compliance with the Groupe's contractual obligations to clients, suppliers and partners.
- For certainty, disclosure of client, supplier or partner confidential information can only be authorized if:
    - prior to the disclosure, the client, supplier, or partner has authorized the specific disclosure in writing; and
    - such disclosure does not result in the breach by the Groupe of any contractual obligations.
- When developing a campaign for a client, the Groupe may have access to confidential information regarding the product, brand, launch dates, commercial or marketing objectives, etc. No one within the organization is authorized to disclose such information without the client's prior written authorization in accordance with our client MSA.
  - All upstream work, particularly creative concepts and strategies, must remain confidential and must never be disclosed without explicit permission.
  - Groupe employees never disclose or share trade secrets. These may include information about marketing strategies, advertising ideas, know-how, systems and processes, and billing rates.
  - Confidential information must never be or shared on unsecured AI tools or platforms, as this poses a risk of unintended disclosure.
  - When applicable law requires the disclosure of confidential information, it is essential that, before any information is released, the client, supplier or business partner is informed of this requirement to the extent permitted by law and that all contractual obligations related to this disclosure are fully observed.
  - Any issue or concern regarding the disclosure of confidential information must be reported to the Country lead counsel or the Groupe General Counsel.
  - For important rules regarding confidential information related to the Groupe: see Groupe Policy III.04. / Insider Trading.

## WHO?

All employees and those working on behalf of the Groupe.

Country and Business Unit CEOs are responsible for compliance.

Policy available to the public on the Groupe website.