

02. Responsible Marketing & Technology

▶ **AT A GLANCE**

- Responsible Marketing is one of the three priorities of the Groupe’s CSR/ESG strategy. It represents a voluntary framework of best practices beyond basic compliance with laws.
- Responsible Marketing is universal and content-and technology-neutral.
- Our work should promote sustainability and inclusiveness and avoid outdated social representations or greenwashing.

FOR WHOM?

All employees and all Groupe activities.

WHAT?

- Responsible Marketing is universal and content-and technology-neutral.
- It represents a voluntary framework of best practices beyond basic compliance with laws.
- The Responsible Marketing framework is aligned with the global Advertising and Marketing Communications Code, established by the ICC (International Chamber of Commerce), which constitutes the roots of the advertising self-regulation system.

HOW?

General Key Principles

The following **14 general key principles** must be applied by all agencies.

- I. **All marketing communications have to be legal, decent, honest, and truthful.**
Local Legal teams support Business teams to ensure the work complies with laws and regulations and avoids legal risks.
- II. Marketing communications must **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 international conventions of the United Nations Global Compact, the OECD (Organisation for Economic Co-operation and Development),

and the International Labor Organization Human Rights policies. Visit the Groupe Policy I.10. / Human Rights.

- III. Descriptions, claims or illustrations must be capable of **substantiation**.
- IV. The value of the product or service and pricing promoted in commercial, or marketing communications **must be clear for the consumer**, including terms of access or usage.
- V. Marketing communications must be **clearly distinguishable** from other types of communication, whatever the medium, platform, or digital channel used. Advertisements including “native advertisements” must be readily recognizable and labelled.

The true commercial purpose must be **transparent and not disguised** as, for example: market research, consumer surveys, independent content, testimonials, or endorsements, whether by influencer, blog, video, private posting on social media, etc.

- VI. The **identity of the marketer**, brand, product, or service must be very clear.
- VII. All marketing communications must **respect the rules applicable for children** (under 12) **and teens** (between 13 to 17). The content must be clearly distinguishable.
- VIII. When **personal data** is collected from consumers or users and regulated by national or other authorities, the individuals concerned must be **clearly aware** of the purpose of the collection and of any intention to transfer the data to a third party for marketing purposes.

Publicis Groupe agencies apply rigorous standards related to the use of data, processing, security, and privacy, aligned with global and local regulations. Visit the Groupe Policy I.04. / Data Privacy.

- IX.** Appropriate measures must be in place to **ensure consumers understand and exercise their rights** pursuant to applicable law such as:
- opt-out from direct marketing lists;
 - opt-out from 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.
- X.** The **wish to not receive** marketing communications using a specific medium **must be respected without exception**. The Groupe upholds universal principles of freedom of will and freedom of choice.
- XI.** Respect for the **confidentiality** of client data and projects is a **fundamental value**. Visit the Groupe Policy II.01. / Confidential Information.
- XII. Intellectual property** (such as copyrighted work, trademarks, and patents), in all media and platforms, is also protected.
- The legal teams must be consulted well upstream of projects to be able to highlight potential issues, including (but not limited to): matters involving third party rights, unfair competition, and compliance with applicable laws and regulations.
 - Data protection and security specialists must be involved in all projects to ensure that these issues are addressed rigorously.
 - AI usage, as in other elements of the work, must respect intellectual property.
 - The PMX Digital team has set up a partnership with WIPO (World Intellectual Property Organization) to identify and exclude sites that violate intellectual property.
 - For Groupe Trademarks and Domain names, refer to the related chapter in Groupe Procedure IV.13. / Intellectual Property Assets - Trademarks & Domain names.
- XIII.** With regard to **vulnerable audiences**: the Groupe defends and promotes the rules set out in the Marketing & Advertising to Children guide by the ICC. The ICC code provides a **framework for communication intended for children** (under 12) and **teens** (between 13 and 18 years old). Due to the general **aging of the population** in many countries, the elderly are among the broadest vulnerable groups. It is imperative to always remain transparent about the sender of the message and to use clear and unambiguous language.
- XIV. Digital accessibility or e-accessibility:** for more than ten years, teams of digital accessibility experts have been involved in numerous projects, notably within Razorfish and Publicis Sapient. Accessibility Center of

Excellence are established around the dedicated team, with experts in many cities.

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. This includes people with various 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 proudly offer our creativity and expertise to advertisers, communities, and NGOs to make a positive impact. In keeping with our commitment, we choose not to engage in work for political parties or organizations promoting ideological agendas." (Visit Publicis Values for more information).

Lobbying Practices

- Some client assignments may involve lobbying and strategies to influence decision-makers on the client's behalf.
- Transparency and legal compliance underpin any lobbying work. 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 comply with laws and regulations, follow best practice and the Groupe's internal rules and be done with integrity, honesty, clarity, and fairness.
- Employees engaged in lobbying activities must follow strict rules. Visit the Groupe Policy I.06. / Anti-Bribery & Anti-Corruption.
- 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. Memberships are public on organizations websites and in the Groupe public disclosure.

Employee training

The Groupe requires that all employees complete mandatory online training, including Data Privacy, Data Security, Anti-Bribery and Anti-Corruption, Generative AI Ethics & Responsible Use and Powering Sustainability.

Other Groupe programs like NIBI (No Impact for Big Impact) are providing Responsible Marketing standards applicable to all Groupe activities in all countries. These standards can be shared with Clients.

Technology, Machine Learning & Artificial Intelligence (AI)

Artificial intelligence (AI), Generative AI, or algorithms based on LLM (Large Learning Models), are used in the Groupe's business lines.

This is done in line with the following **6 key principles**:

1. **Fairness:** We aim for an AI that is accessible and fair to everyone. We use AI that respects inclusion, avoids bias and unintended harm.
2. **Clear Accountability:** We ensure accountability through proactive risk management including human oversight, clear responsibilities, use of approved tools to avoid legal or ethical risks, while protecting intellectual property.
3. **Confidentiality and Security:** We embed privacy and security considerations early in the design process to guarantee secure and regulation-compliant data handling.
4. **Transparency:** We communicate when and how AI is used, trained and obtain client approval beforehand.
5. **Positive impact:** We consider social and environmental factors when using AI.

6. **Test and trials:** We conduct tests to ensure that our projects comply with regulations and industry best practices.

Socialwashing and Greenwashing

- As early as 2009, Publicis Groupe's Chairman and CEO shared a vision across the organization to eliminate greenwashing in advertising and marketing campaigns. Also, in keeping with Groupe values, socialwashing has been banned.
- The Groupe's work must promote sustainability and inclusiveness and avoid outdated social representations. Claims must always be adequately substantiated. The Groupe wants to encourage consumers' behavioral changes and transition to a low carbon world.
- Employees must be informed and trained in Business Ethics and Responsible Marketing local standards applied to their own activity and work.

WHO?

Country and Business Unit CEOs.

Policy available to the public on the Groupe website.