

Specific Standards for Key Executives

► AT A GLANCE

The Key Groupe Executives play a vital role in providing strategic leadership, driving organization performance, setting the ethical tone and shaping the culture and success of the Groupe.

WHO?

All Key Executives.

Key Executives are Publicis Groupe Top Senior Management positions, whose career levels are graded from A to H.

WHAT?

The Groupe expects Key Executives to have high standards of **ethics** and **integrity** in the way they:

- Conduct business and deliver on Groupe goals for clients, shareholders and the community at large; and
- Lead, inspire and develop Groupe talent.

HOW?

6 Principles

This policy outlines the expectations, responsibilities, and standards of behavior for Key Executives:

1. Key Executives hold significant positions of authority and influence within the Groupe and must therefore lead by example, demonstrate high standards of ethics, HR governance and compliance and promote a culture of integrity.
2. They are responsible for helping the Groupe achieve its objectives and deliver the strategy approved by shareholders. They must constantly focus on delivering the best solutions to all clients. This is their primary job.
3. They are responsible for creating the best place to work for all Groupe talent and for promoting a positive work environment that fosters collaboration, innovation, accountability and a strong ethical commitment.
4. They are responsible for attracting, inspiring, mentoring, developing and retaining talent and offering the best career opportunities.

5. They are required to comply with all applicable laws, regulations and industry standards and must avoid any actual or perceived conflicts of interest.
6. They are responsible for promoting Groupe values and policies, including the CSR/ESG and sustainability priorities to achieve the related goals.

Responsibility of Key Executives

Key Executives are also responsible for providing full, fair, accurate and timely information required for main reports filed within Public Authorities.

Any hurdle must be immediately brought to the attention of the Groupe Secretary General and Audit and Financial Risks Committee:

- a. Significant deficiencies in the design or operation of internal controls that could adversely affect the Groupe's ability to record, process, summarize and report financial data;
- b. Any suspected fraud, whether or not material, that involves management or other employees who have a significant role in the Groupe's financial reporting, disclosures or internal controls;
- c. Any violation of Janus, including any actual or potential conflict of interest;
- d. Evidence of a material violation of securities or other laws, rules or regulations applicable to the Groupe and the operation of its business, by the Groupe or any agent thereof, or of violation of the Groupe's Standards of Conduct and Behavior or of these additional rules.

FOR WHOM?

Groupe Key Executives as identified in this policy.

Policy available to the public on the Groupe website.