

# **Non-Financial Performance Statement 2020**

Criteo's Corporate Social Responsibility report

*FINAL VERSION, February 2021*

## Message from the CEO

When we kicked off 2020 with three in-person events, gathering all employees together across each region, we didn't know that a life-altering pandemic was about to upend our plans and make us face new challenges that we had never encountered before. While this reality tested us, it also forced us to look inside ourselves and commit to what is truly important: protecting our employees, advancing our society, and living our values.

With the health and safety of our employees and their families being our top priority, we closed all offices last March and extended our work from home policy to June 2021. During that time, we launched multiple surveys to listen to our employees and further help them adapt to a working from home lifestyle. We are extremely lucky to be a progressive technology company, which allows us to be more flexible in order to ensure the safety of our employees and extended communities. And our team adapted quickly and did an incredible job of supporting our clients, helping them navigate the unknown with resourcefulness and unshakable commitment.

We may have been, and continue to be, physically distant, but we came together in solidarity to support those who were most vulnerable to both the pandemic and civil injustice. For instance, we used our advertising expertise to action with pro bono campaigns for two organizations who play a vital role in the fight against Covid-19, the APHP Foundation in France and the Advertising Council in the US.

And while inclusion and diversity (I&D) were always critical to how we run our business, seeing the eruption of unrest in the US, and echoed around the world, activated our team to further step up and participate in these conversations. As a company, we took action to create an environment where everyone feels heard and accepted. This included launching new Employee Resource Groups, supporting our Black, Indigenous, and People of Color communities, LGBTQIA+ People, People with disabilities, as well as those focused on gender equality. We know all of us at Criteo must actively participate in eradicating our own unconscious biases and have enabled our teams with more trainings and insights to do so. This is a big step towards ensuring that Criteo is an equal, secure, and friendly place for all of our teams.

Criteo is always looking to the future and we are taking action to make that future better. Last year, we signed the Planet Tech Care Manifesto, a project led by the "Responsible IT" program of the French initiative "Syntec Numérique" (a leading industry body in tech) to help technology companies reduce their environmental footprint. We signed as well as the Tech for Good Call, which empowers staff from all backgrounds to fulfill their potential. These initiatives reinforced our commitment to Criteo's values; "Open, Together and Impactful," which we continue to live and breathe every day.

I'm proud to see the impact we can achieve as a company and know that even when we face challenges, we come out of it even stronger. The commitment, positive mindset, and passion of our employees remind us to care about each other and our world every day in order to move forward, and we'll continue to do so together.

Megan Clarcken

## Business model (text version)

Founded in 2005, Criteo S.A. is a **French technology company**, headquartered in Paris and listed on NASDAQ (CRTO), with a **strong presence worldwide**. We began our commercial activities in France in 2007 and have since expanded our business into Western Europe, North America (in 2009), and the Asia-Pacific region (in 2010). Several acquisitions over the years, such as HookLogic, Inc. in 2016, have supported the company's growth and allowed us to steadily develop our offering and market presence.

*Description of main activities, products, and services:*

We are a **global technology company in the ad retargeting sector, powering the world's marketers with trusted and impactful advertising and enabling them to monetize their advertising data and campaigns**. We enable brands' and retailers' growth by activating commerce data through artificial intelligence ("AI") technology, reaching consumers on an extensive scale across all stages of the consumer journey, and generating advertising revenues from consumer brands for large retailers.

**Our vision is to build the world's leading Commerce Media Platform** to deliver measurable business outcomes at scale for global brands, agencies and retailers across multiple marketing goals. Our data is pooled among our clients and offers deep insights into consumer intent and purchasing habits. To drive **trusted and impactful advertising for marketers**, we activate our data assets in a privacy-by-design way through **proprietary AI technology** to engage consumers in real-time by designing, pricing, and delivering highly relevant digital advertisements ("ads") across devices and environments. We price our offering on a range of pricing models and measure our value based on clear, well-defined performance metrics, making our impact on the business of our clients both transparent and easy to measure.

Each day, we are presented with billions of opportunities to **connect consumers with relevant advertising messages from our commerce and consumer brand clients**. For each of these opportunities, our algorithms analyze massive volumes of shopping data to predict consumer preferences and intent and deliver specific messaging for products or services that are likely to engage that particular consumer. Historically, the Criteo model had focused solely on converting our clients' website visitors into customers, enabling us to charge our clients only when users engage with an ad we deliver, usually by clicking on it. This pay-for-performance pricing model **links the cost of an advertising campaign to its effectiveness** and has long been valued as such by our clients. We have since expanded our solutions to address a broader range of marketing and monetization goals for our clients, including audience targeting.

Over the past 15 years, we have established our market position by focusing on three pillars: **actionable commerce data, predictive technology** to activate data for multiple marketing goals, and **large consumer reach** through our extensive direct publisher and retailer network. As commerce companies and consumer brands have embraced our offerings, we have achieved significant growth since our inception and are now operating in 100 countries.

**The Criteo Commerce Media Platform and Publisher Network:** Our offering, the Criteo Commerce Media Platform, is powered by AI technology and aims to cover advertisers' goals across the marketing funnel, from brand awareness to customer acquisition or consideration and to conversion. Our technology is optimized to drive trusted and impactful business outcomes for our commerce and consumer brand clients, including, for example, consumer visits to a client website, installations of an app, product sales and monetization of retailers' inventory with brands. Criteo solutions work seamlessly across digital devices, commerce and advertising environments (browsers, apps, connected TV and physical retail stores), platforms and operating systems, advertising channels and publisher environments. We provide our

clients with extensive real-time access to advertising inventory through direct relationships with thousands of publisher partners, as well as real-time bidding (or "RTB") exchanges.

*Challenges, trends, and opportunities:*

Over the past three years, the **growth of retargeting has been slowing down** and turned negative since 2019. Over the period, cookie restrictions on several browsers have had a significant negative impact on our business on the web, including on retargeting. The **COVID-19 pandemic was an additional headwind** to this business in 2020, impacting in particular some of our clients, for instance, in the travel vertical. On the other hand, the **ability to engage customers across the various steps of the consumer journey remains critical** for businesses in the broader commerce and consumer brand sectors.

We believe that our Commerce Media Platform is transforming the way marketers use digital advertising and are currently strengthening our offering and expanding our business, always focused on driving trusted and impactful results for clients.

Our **large and loyal base of clients and first-party publisher partners** provide for stability and positive network effects. As of December 31, 2020, we had over 21,000 clients and were working with over 5,000 direct publishers on both web and apps, in addition to all of our large global and local real-time bidding (RTB) partners. As we continue to grow our client base, we also continue to grow the number of users who interact with our ads. These direct integrations on both the demand and supply side ensure **access to data in privacy-compliant ways** (shielding from the consequences of third-party cookie limitations) and **growth of our data assets**, enabling us to deliver even more precisely **targeted and personalized ads**, to further **expand our publisher network** and to generate a **greater impact for our clients**. We believe this cycle of self-reinforcing network effects will continue to fuel our business in the future.

To that purpose, we can also rely on strong assets to ensure the continuity and development of our activities.

*Key inputs and assets for Criteo:*

**Clients:** Our clients include some of the largest and most sophisticated commerce companies in the world, mainly from the retail, travel, and classifieds verticals, along with world-class consumer brands. We partner with them to capture user activity on their websites and mobile applications, and optimize the performance of their ads based on that activity and other data.

KPIs:

- As of December 31, 2020, we served more than 21,000 clients
- In each of the last three years, our average client retention rate, as measured on a quarterly basis, was approximately 90%
- Delivered 1.6 trillion targeted ads in the year ended December 31, 2020

**Employees and Human Capital Management:** Our company is driven by our core values of "open, together and impactful." We devote time and efforts across all our locations to provide positive working conditions, work-life balance, and a healthy work environment for our employees. Inclusion and Diversity, in particular, are strongly valued, with significant steps taken in recent years and presented in this report. Additionally, we strive to provide adequate training opportunities and development programs for all our employees. Attracting and retaining top talent is a key objective at Criteo, and we invest significantly in talent acquisition. To assess and improve employee retention and engagement, we periodically survey employees and take

action to address areas of employee concern. In 2020, in addition to our annual employee engagement survey, we carried out two surveys specific to COVID-19 concerns, soliciting feedback on a wide range of topics from well-being to productivity to social links with other employees.

KPIs:

- As of December 31, 2020, we had 2,366 employees, of which 41% were female (figures calculated on the CSR scope)
- In 2020 about 30,000 training hours were delivered to our employees (in-class and online)
- In 2020, the global score for the employee engagement survey is 73 (on a scale from 0 to 100)

**Infrastructure:** Our ability to execute depends on our highly sophisticated global technology software and hardware infrastructure. Our global infrastructure is divided into three independent geographic zones in the Americas, APAC (Asia-Pacific) and EMEA (Europe, Middle East, and Africa). In each of these geographic zones, our services are delivered through data centers that support this particular zone. We generally rely on more than one data center in any given zone and within large zones, the data centers are strategically placed to be close to our clients, publishers and users. We use multiple-layered security controls to protect Criteo AI Engine and our data assets. The environmental performance of our data centers has also become a key criterion when selecting providers, and we aim to keep improving the carbon footprint of our infrastructure and overall activities in future years.

KPIs:

- As of December 31, 2020, our global infrastructure included over 49,000 servers through a global network of ten data centers
- As of December 31, 2020, storage capacity exceeding 750,000 terabytes and 2,000 terabytes of random-access memory
- As of December 31, 92% of DC energy sourced from renewable sources and 3,693 tons of CO2 emissions linked to data centers use (taking into account compensation efforts)

**Research and Development (R&D):** We invest substantial resources in research and development to conduct fundamental research on artificial intelligence, machine-learning models, enhance the algorithms in Criteo AI Engine, develop new features and solutions, conduct quality assurance testing, improve our core technology and enhance our technology infrastructure. Our engineering group is primarily located in research and development centers in Paris, France, Grenoble, France, and Ann Arbor, Michigan. We expect to continue to expand the capabilities of our technology in the future and to invest significantly in continued research and development and new solutions efforts (Product team). Our intellectual property rights are also a key component of our success, and we rely on a combination of patent, trademark, copyright, and trade secret laws, as well as confidentiality procedures and contractual restrictions, to establish, maintain and protect our proprietary rights.

KPI:

- We had more than 620 employees primarily engaged Research and Development and Product as of December 31, 2020.
- Research and development expenses, including expenses related to the Product group, totaled \$132.5 million for 2020

**Privacy, Data Protection, and Content Control:** Privacy and data protection laws play a significant role in our business. The regulatory environment for the collection and use of consumer data by advertising networks, advertisers, and publishers is frequently evolving in the

United States, Europe, and elsewhere. In addition to complying with extensive government regulations, we voluntarily and actively participate in several trade associations and industry self-regulatory groups that promulgate best practices or codes of conduct relating to targeted advertising. We also provide consumers with a notice about our use of cookies and our collection and use of data in connection with the delivery of targeted advertising and allow them to opt-out from the use of such data for the delivery of targeted advertising.

**Financial results:** see figures below

KPI:

- Revenue of \$2,072.6 million for the year ended December 31, 2020
- Revenue excluding Traffic Acquisition Costs, or Revenue ex-TAC, of \$825.0 million for the year ended December 31, 2020
- Net income of \$74.7 million for the years ended December 31, 2020
- Adjusted EBITDA of \$251.0 million for the year ended December 31, 2020

## Corporate Social Responsibility (CSR) risks and materiality analysis

In 2018, Criteo performed its first CSR-related risk assessment. A list of sustainability-related risks based on benchmarks from our business sector was identified and surveys were conducted with internal stakeholders who work in CSR leading departments. These stakeholders classified the risks in order to achieve a priority list of areas of potential impact. Based on this analysis, Criteo selected eight main CSR risks<sup>1</sup>.

In 2019 and 2020, Criteo further developed the conversation on CSR by interviewing:

- 12 more internal stakeholders from several departments (People, Talent Acquisition, Talent Management, Compensation & Benefits, Workplace Experience, Internal IT, Legal and Investor Relations);
- 3 external stakeholders (a publisher and two suppliers/partners).

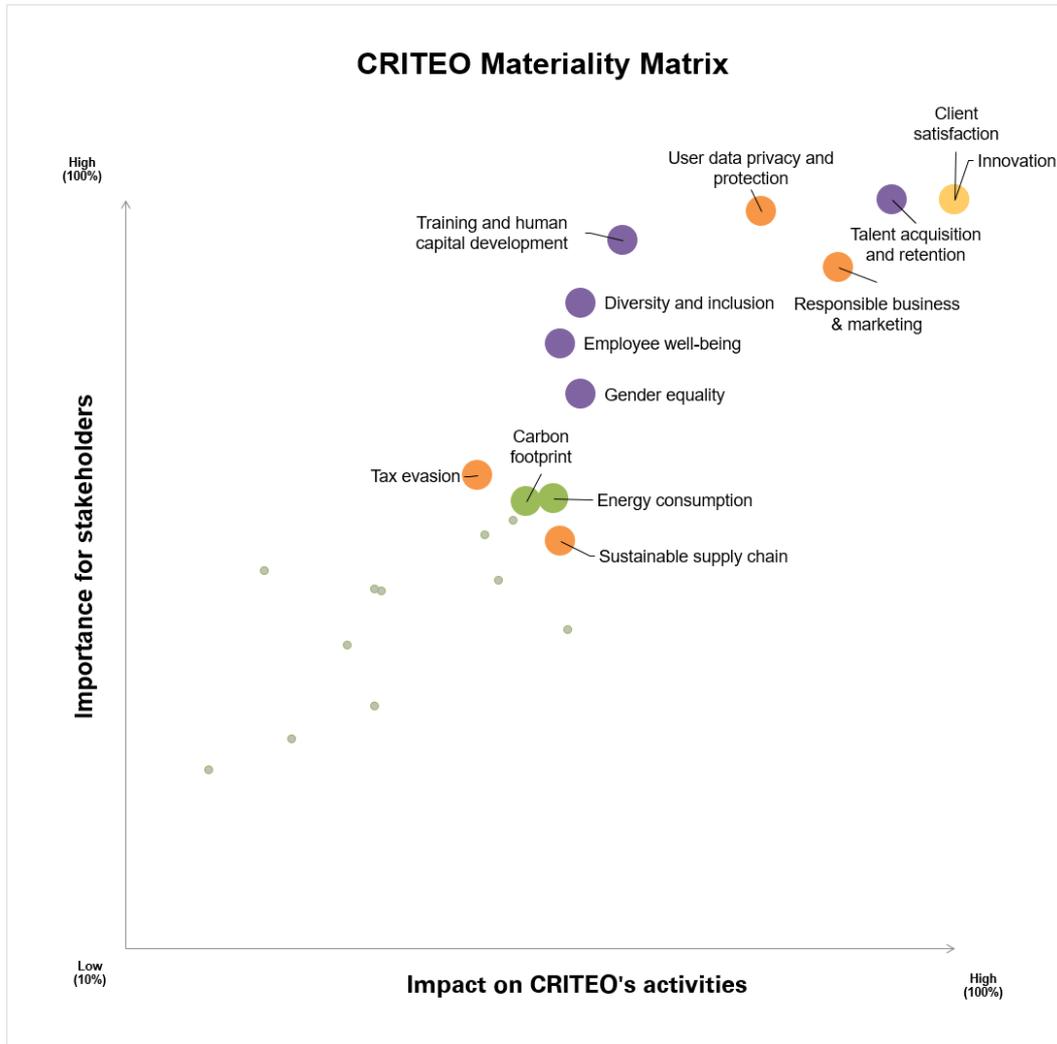
Those stakeholders were asked to assess the importance and relevance of the CSR topics considered during the 2018 risk analysis and completed a few additional topics that were also relevant to Criteo's activities.

Combining the results of those interviews and of the risk assessment, we established our materiality analysis, presented below. We consider this work a major step in further structuring our CSR approach.

The materiality analysis is reviewed and validated every year, together with this entire CSR report, by selected proofreaders within Criteo. Those proofreaders include among others the following directions: Legal, Public Relations, Investor Relations, People and Marketing.

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<sup>1</sup> List of main CSR risks identified: Talent acquisition and retention, Training and human capital development, User data privacy and protection, Energy consumption, Carbon footprint, Supply chain, Gender equality, Inclusion and Diversity.



Category	Material CSR topics	Section
<b>Talent acquisition, development and well-being</b>	Talent acquisition and retention	i. 1-2-3
	Training and human capital development	i. 4-5
	Employee well-being	ii. 1-2
	Inclusion and Diversity & Gender Equality	i. 3; ii. 3
<b>Relation with clients</b>	Client satisfaction	iv. 2
	Innovation	i. 4-5
<b>Compliance and responsible practices</b>	User data privacy and protection	v. 1
	Responsible business and marketing	v. 3-4
	Sustainable supply chain	iv. 4
	Tax evasion	v. 2
<b>Environmental impact</b>	Energy consumption	iii. 1-2
	Carbon footprint	iii. 1-2

## i. Investing in headcount and talent initiatives

Criteo operates in all corners of the globe and has around 30 offices across the Americas, Europe, Middle East and Africa (EMEA) as well as Asia Pacific (APAC). **The growth and transformation of Criteo over the last 15 years is spurring us to invest in smart and talented people.** Consequently, we have implemented an ambitious talent acquisition policy. To support the teams, we have created a strong corporate culture favoring the personal and intellectual development of its diverse workforce of more than 2,600 employees.

### 1. Headcount

As of December 31, 2020, **Criteo had 2,617 employees globally.** Compared with 2,793 at the end of December 2019, Criteo's workforce decreased slightly during the year 2020 (a decrease of -6%). This figure includes all of Criteo's active employees on December 31 (permanent and non-permanent employees).

The workforce-related figures presented in this report **only refer to Criteo's largest global legal entities**, i.e. those with more than 50 employees. Legal entities that joined Criteo's financial scope during year N are included in the CSR scope in year N+1. As of December 31, 2020, the entities included in the CSR scope accounted for 90% of Criteo's total headcount, i.e. **2,366 employees** (compared to 2,538 at the end of 2019).

Entity	2019			2020			Var.
	Women	Men	Total	Women	Men	Total	
<b>Criteo S.A.</b> (France, Headquarter)	273	677	<b>950</b>	273	634	<b>907</b>	-5%
<b>Criteo Corp.</b> (United States)	293	427	<b>720</b>	256	340	<b>596</b>	-17%
<b>Criteo Europa S.L.</b> (Spain)	156	160	<b>316</b>	175	162	<b>337</b>	7%
<b>Criteo Ltd</b> (UK)	39	46	<b>85</b>	37	44	<b>81</b>	-5%
<b>Criteo KK</b> (Japan)	57	71	<b>128</b>	59	65	<b>124</b>	-3%
<b>Criteo GmbH</b> (Germany)	46	46	<b>92</b>	44	44	<b>88</b>	-4%
<b>Criteo Singapore Pte. Ltd.</b> (Singapore)	39	31	<b>70</b>	39	26	<b>65</b>	-7%
<b>Criteo France SAS</b> (France)	54	48	<b>102</b>	54	52	<b>106</b>	4%
<b>Criteo do Brazil LTDA</b> (Brazil)	29	46	<b>75</b>	27	35	<b>62</b>	-17%
<b>Total</b>	<b>986</b>	<b>1,522</b>	<b>2,538</b>	<b>964</b>	<b>1,402</b>	<b>2,366</b>	<b>-7%</b>

As of December 31, 2020, the **964 women in our headcount represented nearly 41% of the total workforce of 2,366 employees.** Same as all headcount-related data that will be disclosed further in this report, this percentage is calculated on the CSR scope. Young people (below 35) account for the majority of Criteo's employees, which is to be expected in a high-tech company relying on a workforce with skills in the latest trending technologies.

Workforce breakdown by age	2019	2020
Under 25	143	120
Between 25 and 29	696	590
Between 30 and 34	786	766
Between 35 and 39	486	464
Between 40 and 44	246	244
Between 45 and 49	118	116
50 and above	63	66
<b>Total</b>	<b>2,538</b>	<b>2,366</b>

## 2. Recruitments and terminations

Attracting top talent is key at Criteo and we grant great importance to the quality of our talent acquisition processes at all times.

### a. Continuous improvement of our recruitment processes

Despite the Covid-19 pandemic, 2020 was still an important year for us in terms of recruitments (volume and improvement of processes). **“Open, together and impactful” are our new company values, portrayed by our new CEO Megan Clarken.** Those values drive the efforts of our People team to attract and retain the best talents at Criteo.

In line with our values and aiming to continuously improve the quality of the hiring process, we pursued the roll-out of our **global roadmap for gender equality**. In 2020, we launched a new dashboard dedicated to that purpose. Addressed to team leaders, this dashboard enables them to monitor the gender distribution in their teams quarterly (evolution of the workforce, number of women recruitments, etc.).

Same as in 2019, a **dedicated training program is offered** so that employees involved in recruiting activities can receive adequate guidance. This program provides support for carrying out interviews and ensures the compliance of the recruitment process with regulations and Criteo's standards such as personal data protection (GDPR), non-discrimination, etc.

With the dual objective of ensuring consistency in the management of recruitment activities and taking a more strategic approach to engaging with external talents, Criteo relies on its **new Talent Candidate Relationship Management (CRM) platform**. Launched in January 2020, this tool allows hiring teams to manage external talent pools (such as interns) in a strategic, efficient, consistent and compliant way.

### b. Focus on the R&D team

While talent acquisition is a major focus area for all of Criteo's activities, **we pay close attention to our R&D teams**, where candidates have highly specialized profiles and our recruiting approaches consequently need to be adapted.

Criteo has made recruitment for the R&D team a high business priority, and for this reason, R&D recruitment is entrusted to a specific R&D Talent Acquisition (TA) Team that is working hard on selecting and attracting future talent. The R&D TA team partners closely with the Tech Hiring Guild, whose purpose is to continually evaluate and ensure a robust process for the assessment of technical skills as part of the hiring process.

Some initiatives to improve candidate experience are conducted as part of the R&D Inclusion & Diversity Roadmap (see the section dedicated to measures taken for diversity and gender equality for more details). For example, the R&D TA Team hosted awareness sessions about non-discrimination and bias during the hiring process. Same as in 2019, Criteo also endeavored in 2020 to have at least one female interviewer per interview, especially it is always the case where the candidate is a woman.

*Criteo's Campus Program for R&D*

**Our Campus program is how the R&D team targets candidates before they graduate.** Criteo works with a network of schools and participates in career forums that connect companies and students. Those events allow us to promote our activities directly to students, meet with candidates, collect resumes, and organize future interviews.

The Campus Program recently diversified its approach by **increasing the focus on schools and universities where candidates present more diverse profiles, both socially and ethnically.** Due to Covid-19 restrictions many events planned for this year were unfortunately cancelled. However, where possible, Criteo participated in virtual campus events to maintain its relationships with schools and to continue hiring interns for its R&D teams. In addition, through continued partnership with certain schools, Criteo was able to coordinate remote internships throughout 2020.

**c. Hires and terminations**

In 2020, 670 employees exited the company and 502 were hired across the globe.

<b>New Hires &amp; Terminations</b>	<b>2019</b>	<b>2020</b>	<b>Var.</b>
<b>New Hires</b>	<b>750</b>	<b>502</b>	<b>-33%</b>
<b>Terminations</b>	<b>732</b>	<b>670</b>	<b>-8%</b>
Employee's initiative	499	390	
Employer's initiative	123	174	
Other (e.g. end of fixed-term contract)	110	106	

We closely monitors our attrition rate and put in great efforts to better understand and reduce it as much as possible. For instance, we have built a database to analyze the reasons for departures. Those analytics are making it easier to predict attrition rates depending on geographic areas and populations. More importantly, they enable Criteo to anticipate the number of recruitments needed.

In the coming years, we intend to find ways to attract more diverse talent and work on employee engagement to improve the retention rate.

### 3. Compensation & benefits

In the tech sector, compensation is a critical differentiating factor if a company wishes to attract and retain talents and to stand out from the competition.

Criteo set up a global **Group Policy to ensure that compensation offered is competitive** compared to the market, depending on jobs and expertise levels, geographical areas, etc.

This policy is enforced by Criteo's Compensation & Benefits team, who monitors the market and performs salary surveys for all components of employees' remunerations. They conduct a yearly review of salary levels across the Group, ensuring notably that compensation abides by the Global Group Policy. The Compensation & Benefits team also oversees practices across all of Criteo's entities, taking into account country-level specificities with the help of local People teams.

In 2020, annual base and variable salary compensation payouts for the legal entities included in this CSR report were € 218,263,950 – a 11% decrease compared to €243,901,688 in 2019.

**Criteo does not discriminate against any category of employees through remuneration.**

However due to the structure of our smaller teams and to the specific technical profiles sought after in some positions, we do observe some salary gaps across populations depending on gender, age, etc. We are currently working on a specific tool to facilitate the monitoring of salary gaps across the Company. This dashboard is expected to be circulated amongst team leaders and used for regular monitoring of the way the situation evolves.

In 2020, a **comprehensive analysis of salary levels across Criteo was launched**. The purpose of this analysis is to assess the competitiveness of an employee's base salary compared to the market salary for equivalent positions, as well as have a better understanding of the possible differences of salaries between men and women. This compa-ratio enabled the Compensation & Benefits team to assess that **there exists in 2020 a 2.8% gap between the salaries of men and women, in favor of men** (once the gaps that can be attributed for instance to different local market salary levels are accounted for). The analysis also disclosed that compensation discrepancies between men and women for employees starting their new jobs have been **drastically reduced over the last two years and amounts today to a 1.2% difference**, thanks to the work of the involved teams who activated several levers as part of our **Pay Parity Action Plan**.

The Pay Parity Action Plan was launched with the aim of improving our understanding of those residual differences in salaries, and with the ultimate objective to bridge the gap between the alignment of a woman's and a man's salary with that of the market. The teams are working on various areas such as :

*At hiring:*

- Ensure pay equity by running quarterly analysis on New Hire offer per gender,
- Training for managers

*At merit cycle:*

- Ensure balanced performance rating distribution per gender,
- Ensure average increase balanced between Female and Male

*At promotion & mobility:*

- Ensure equal access to promotion and internal mobility opportunities
- Perform analysis on average increase proposed during promo based on gender

*After a leave of absence:*

- Ensure compensation analysis done upon return of leave of absence
- Specific to maternity – ensure increase is proposed upon return
- Offer a career discussion when employees return from leave

Also, in 2020, as per French regulations, we disclosed our Women-Men Equality Index for France – which reaches 92 out of 100 (same as 2019).

In addition to compensation, employee benefits are also a pivotal point in the very competitive tech industry, and appear as a key component for talent recruitment. Criteo thus puts a strong emphasis on making progress on the multiple aspects of employee benefits.

In 2020, the decision was made to extend the secondary care parental leave from two weeks to four weeks in France, the United States, Canada, Spain and Brazil. This will be proposed to all secondary parents, regardless of their gender or marital situation, in line with our core Inclusion & Diversity principles. In future years, Criteo plans on expanding this extended secondary care parental leave for all countries where we are located.

## 4. Skills Management & Development

**We continuously invest in our people development programs**, both in terms of resources and organization as well as processes and experiences. Those efforts demonstrate the importance granted by the company to talent growth and management.

In particular, specific trainings were organized in 2020 regarding the below topics, and will be presented later in this chapter:

- Management
- Performance and Development – Talent Review
- Support in the Covid-19 situation
- Sales
- Digital Market Knowledge
- Impactful & influencing presentations
- New Code of Conduct Global Launch
- LinkedIn Learning Paths
- Coursera leverage for tech teams

In the following section, the different types of training we provide are referred to as:

**In-class trainings:** “Live trainings” and “virtual classrooms” where:

- Live training refers to trainings delivered face-to-face by an internal or external trainer;
- Virtual classrooms refer to virtual trainings delivered by an internal or external trainer via Zoom.

**Online trainings:** trainings autonomously followed by employees through digital learning platforms.

## a. In-class training 2020 highlights

The main activities carried out for in-class trainings in 2020 are presented in this section.

### - **Management:**

We redesigned our management program with the objective of developing managers' coaching, feedback and conversation skills. We aimed to equip managers for the Perform & Develop program. We trained them on having performance and development conversations with their team members and created an e-learning module focused on manager behaviors we want to see in the organization. These manager behaviors are aligned with Criteo values and are a great resource for our managers to better understand what is expected from them.

### - **Performance and Development:**

The Learning and Development team designed trainings, with the help of the People Experience Team, on the Perform & Develop program. The focus was on delivering training about career development, career conversations for managers and individual contributors and Self-awareness (DISC assessment). We also created videos to support employees and managers in the goal setting process, as well as receiving and giving feedback.

### - **Support in the Covid-19 situation:**

As soon as the Covid-19 situation started, Criteo supported all employees globally by organizing virtual trainings offering advice on remote working setup, the management of remote teams, and on mental and physical wellbeing. Digital content around those topics emphasize the most accurate content linked to each individual employees' needs. These learning experiences were designed in partnership with the Covid-19 steering committee, People and Workplace departments, and the employees themselves (e.g. sport initiatives).

### - **Sales :**

As a follow-up to 2019, several trainings were organized for the Sales teams, including: "Negotiation" and "Influence", NLP (Neuro Linguistic Programming) and Consultative Posture. These trainings constitute a preparation phase for the Sales Academy project, which we expect will be launched in 2021.

### - **Impactful and influencing presentations:**

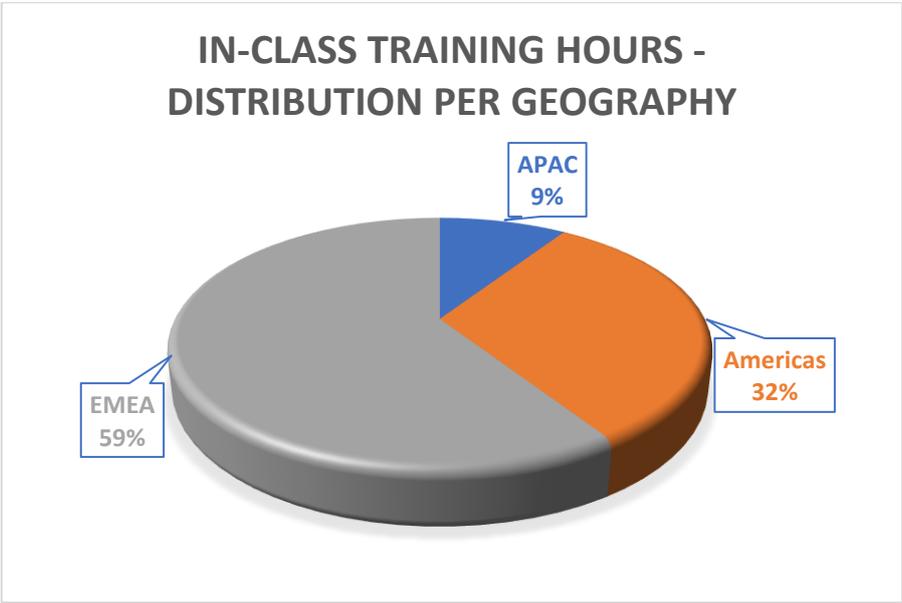
One of our soft skills focus in 2020 has been "impact" and "influence". We developed learning experiences to support our teams in being more impactful when presenting using storytelling techniques and influencing stakeholders. We believe that these skills are even more crucial in a new remote context where transversal collaboration is key for the success of our global projects.

On the Digital Market side, we focused on getting a better understanding of the digital environment for departments other than Sales in 2020.

Although this report focuses on formal training activities, whether instructor-led or online, much **more is happening in the field and the office on a day-to-day basis**, ranging from Criteo's cross-functional teams and organizations, through peer-to-peer learning to social learning activities. These more informal and ad-hoc learning activities which are promoted and facilitated locally represent a large part of the learning experience and are a key part of Criteo's learning culture.

*In-class training hours*

IN-CLASS TRAINING	Training hours	Including hours backed by evidence	Average training hours per employee	Average training hours per trained employee	% of trained employees	Number of training sessions	Average number of sessions per employee
2020	16,249	12,205	6.7	9.9	67%	507	0.2
2019	31,539	13,751	12.2	15.2	80%	538	0.2
% evolution	-48%	-11%	-45%	-35%	-16%	-6%	1%



The decrease of in-class training hours in 2020 can be explained with the specific context of Covid-19 which affected Criteo's in-class training programs worldwide. Criteo teams strived to adapt to the context, and in-class training sessions were partly turned into virtual training sessions. The learning contents were also adapted to focus on essential via bite-sized learning, leading to an overall reduction of the duration of training sessions. Regarding the number of training sessions itself, the decrease is of 6% only compared to 2019.

**b. Online trainings 2020 highlights**

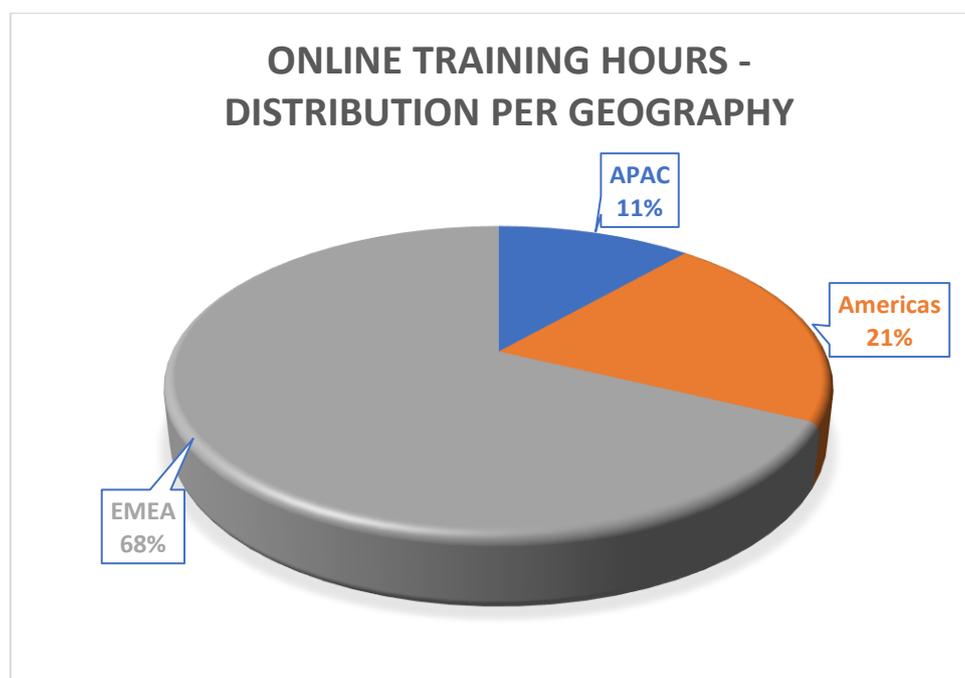
The main activities carried out for online trainings in 2020 are presented in this section.

- **Growing usage of LinkedIn Learning:** we completed our first year with LinkedIn Learning and reached a nearly 80% adoption rate for our employees. This activation combined with the increasing number of hours spent online for self-development show how important Digital Learning is, especially with the current remote working situation. We are now embedding digital resources in most of our Learning Paths.
- **Leveraging Coursera mainly for tech topics:** progressively switching to unlimited Coursera licenses for those who need it, especially among the tech teams like R&D. This still accounts for an important share of the online training hours.

- **Code of Conduct:** After a revamp last year and a successful pilot of the new Code of Conduct online training, we had a global launch of this course at the end of Q3 2020 for all Criteos. More information is provided in the section dedicated to anti-corruption.

#### Online training hours

ONLINE TRAINING	Training hours	Average training hours per employee	Average training hours per trained employee	% of trained employees
2020	14,063	5.8	6.7	87%
2019	11,584	4.5	4.8	93%
% evolution	21%	29%	38%	-6%



On top of the core online training hours reported above (skills development-driven), employees have completed further online training. This represents about 2,045 hours and covers Compliance modules (44% of these hours), FlyCriteo On-boarding modules (52%) and digital literacy on collaboration applications (4%).

#### c. Peer-to-peer and social learning practices

Peer-to-peer and social learning are part of our learning culture and DNA. They represent a large part of the employee learning experience and whilst they are not being translated in formal training hours, they have a positive impact on the employee base.

However, because of the Covid-19 pandemic, some initiatives launched in 2019 and mentioned in last year's CSR report that should have been continued in 2020 were suspended.

Our priority was indeed to address more urgent matters, such as ensuring the continuity of training in a remote working environment. We hope better conditions in 2021 will allow us to revive some of the initiatives launched in 2019.

During our annual "Kick-Off" event, we organized "**Criteo University**" sessions. These are one-hour lectures proposed by Criteos (volunteers) to deepen a subject directly related to the company's activities. A few days before the event, Criteo employees could sign up for the two sessions they preferred from a list of about ten conferences with various themes. Some examples include:

- EMEA – Clémence Vermersch, "Understand what moves Criteo shares up and down and how Criteo is valued and perceived by financial analysts and investors"
- US – Brenda Mitchell and Cara Sugli, "Elevating Your Global Professional Profile for Career Transformation"
- APAC – Jean-Baptiste Rudelle, "Can we reduce carbon emissions? What are the most effective strategies to reduce carbon emissions? How is Criteo approaching the topic and what is our impact?"

#### **d. Improving training delivery methods and tools**

Since 2018, a **common training tracker** called the "Global Learning Tracker" is used by People Development Partners and the Product Training Team for the In-class training sessions. This gives managers the means to track the trainings of their teams. In 2020, **the Global Learning Tracker was reviewed and strengthened**. All trainings are now tracked in regional tracking Excel files quarterly. Because of the unique sanitary context, attendance sheets have been replaced by extracts from the Zoom system to assess the attendance of participants.

In parallel, Criteo has launched an RFP (Request For Proposal) for a **new Learning Management System (LMS) expected to be rolled out at the beginning of 2021**. This new LMS will allow better centralization of Criteo training contents and to better track information, and to report training data most efficiently. This platform will help both learners and People teams to work more efficiently as ensuring the learning contents answers to business & development needs and focus on tasks other than monitoring.

## **5. Hackathon**

At Criteo, we believe that innovation is part of everyone's job and we know it is critical for Criteo to stay ahead of the competition.

**The "Hackathon" provides the support and flexibility needed to turn employees' ideas into reality.** Employees are invited to submit their ideas related to product innovation, revenue generation, profit optimization, or business efficiency. This initiative is a great opportunity to acquire or leverage skills and knowledge from "on the job" on topics that people are passionate about.

In 2020, the Hackathon had to be carried out virtually due to the Covid-19 situation. The event being digital meant everything had to change. No more meeting rooms, no more free food and radical entertainment, but rather virtual war rooms, online cooking and yoga classes. Even our judging session shifted. With no access to giant amphitheatres to accommodate all teams' supporters, we prepared in the EMEA region three simultaneous webinar judging sessions. To ensure that the pitching went as smoothly as possible, we encouraged teams to make their presentations as pre-recorded videos. Also, we asked them to keep their pitch under the specified time frame: three minutes for the presentation and five minutes for the Questions & Answers (Q&A).

The engagement of the Hackathon audience was also an important point for us. With no

possibility for Criteos to cheer up directly for their colleagues, in 2020 we set up the **People Choice Awards**. The audience had the opportunity to vote for their favorite project and team and win some prizes all while learning about the amazing projects at Criteo.

## ii. Wellbeing, inclusion and diversity at work

Employee health and safety is a priority for Criteo. We devote time and efforts across all locations to provide positive working conditions, work-life balance and the healthiest office environment for its employees. **In 2020, our top priority was the safety of employees, as continuously reaffirmed by Criteo's new CEO Megan Clarken** through the Covid-19 pandemic. Keeping the health of our people across all our locations at the center of our priorities, Criteo implemented several measures in 2020 to support them in facing that exceptional situation in the short term, but also anticipating longer-term consequences.

### 1. Safety and wellbeing at work

#### a. Management of the Covid-19 pandemic

2020 was a particularly challenging year worldwide with the propagation of the Covid-19 virus. For global businesses such as Criteo, the pandemic was a multifaceted challenge. Of course, the health of our employees was and is still our primary concern, including their well-being when working remotely in possibly complicated or stressful conditions. Following the pace of the pandemic, we continuously adapted to the everchanging country-level measures (e.g. countrywide lockdowns). More than ever, communication with our people proved essential to address everyone's concerns and propose adequate solutions.

Ahead of countries' legal provisions, Criteo decided to temporarily close its first offices as early as January 2020 in China, and in other countries in the following months. Ever since we have sought to **limit the return of employees to offices**, including during times of less strict lockdown measures (e.g. during the 2020 summer in Europe). As of today, Criteo's offices remain open only for specific cases, for instance when an employee faces conditions too inadequate to work from home.

To determine the safe level of occupancy in offices in line with guidelines set by various governments, we **always picked the strictest rules as our standard**. As a result, the rule is not to exceed 20 to 30% of occupancy over all of Criteo work locations.

In every office, the desks and chairs were laid out to respect social distancing, routes were traced on the floor so that people wouldn't have to cross face to face, and sanitizer holders were provided as well as desk signage. Criteo provided also its employees with own face masks manufactured.

Finally, in the event that an employee needs/wishes to work from the office, a strict procedure was set up:

- Booking on a dedicated tool within the safe occupancy level in case of a partial re-opening of offices
- A stricter access policy for offices at high-risk level, requiring Only employees with a critical business reason to obtain formal approval from Director level.

This unprecedented sanitary context has been a confirmation for Criteo that **we are able to react quickly to such emergencies**.

Linked to the Covid-19 pandemic, Criteo created a **specific program to ensure employees**

**would still be able to work in the best conditions possible.** We partnered with an external firm providing psychological support, this partnership still being active today (see section d.). This specific program also includes financial support up to around \$700 for each employee to buy suitable equipment (screens, ergonomic chairs, desks, etc.) for teleworking. Lastly, the onboarding program was completely redesigned and adapted to welcome new joiners remotely. People teams and managers are working closely together to welcome new joiners in the best conditions during that unique period.

**Communication to employees regarding the Covid-19 situation is essential** to Criteo. We created a **Group Steering Committee** in February 2020, with representatives from all our geographies and functions. A local US committee was also set up to address the specific situation in the Americas. In charge of overseeing the global situation and rolling-out adequate measures, those Committees also deliver specific Covid-19 communications to all employees, through e-mails and on the internal website. Our CEO Megan Clarken regularly delivers direct messages to employees, leveraging the Steering Committee's own communication.

Criteo carried out **two Covid-19 surveys in June and September 2020.** The purpose was to obtain feedback on employee's current feelings and concerns, to identify measures that have been well-received and to know what could be improved. Those surveys tackle a wide range of topics, from well-being to productivity to social links with other employees. With respectively **91% and 93% response rate, these two surveys have both received very high response rates** from employees.

The results of the September survey show that **Criteo is slightly improving in terms of employee well-being compared to the June survey.** The general sense of wellbeing is relatively high compared to other companies. Indeed, **90% of employees feel they can deliver their best work from home and 94% wish to continue work from home in the future** with a mix of work from home and working from the office (60/40% or 50/50%). As in June, employees feel proud to work for Criteo and continue rating Criteo culture highly. Also, the additional ergonomics support put in place after the June survey got very positive feedback and helped employees to deliver their best work and feel well. Lastly, the results of the September survey shew a strong request from employees to provide visibility of Criteo's future flexible working plans. Regarding this last request, a new **Work From Home policy** was announced internally in December 2020. It will come into effect as of 2021, January 1<sup>st</sup>, and will be effectively applied when our employees go back to the offices in June 2021.

The Covid-19 pandemic opened the way to new working practices, and we want to maintain those advantages that employees have appreciated from this situation. We already announced that employees would not go back to offices before June 2021. We are now rethinking the way our people can keep working remotely but together in the long-term, maintaining the connection to each other and protecting Criteo's company culture which is our DNA.

## **b. Work organization**

The Covid-19 pandemic is making us revise our previous organization on the matter of remote working and working hours. For instance, in France, an agreement was signed in February 2019 to allow people in the Paris office to work from home one day per week or more, which was the only formal policy in place across the Group.

We now have to think of the long-term conditions that will come in a post-Covid-19 world, in which remote working has become the norm for our industry. This work includes finding new ways of ensuring a good work-life balance for employees, in a context when office presence is no longer a way to monitor employees' working hours. As part of this topic, a new tool named TIME, allowing to record working hours (including extra working hours), has been rolled out in December 2020.

### c. Safety at work

At all times, Criteo aims to ensure a safe workplace environment.

Launched in 2019, The **Health & Safety Management System (H&S MS) project was completed and approved at the end of 2020**. It will be rolled out in the coming months and years.

The main aim of the H&S MS is to establish a global standard across the Group in terms of security norms in offices (fire protection, etc.). This policy was established based on an assessment of local standards and practices in each of the countries where Criteo is located, **retaining the strictest criteria as the Group's standard**. It will be in place in all offices worldwide, and Criteo will keep track of the compliance level of each office, to be able to tackle the improvements to be made. In addition, each workplace has already named a H&S referent in charge of implementing the Health & Safety policy. H&S referents will receive specific trained regarding their roles and responsibilities.

The **safety of employees traveling for business** is also important to Criteo. In 2016, Criteo launched an International SOS Assistance tool to complement the existing employee emergency assistance with AXA healthcare. This tool acts as a 24/7 hotline for support on security issues, especially when traveling, and also tracks all Criteo travelers so that they can be identified and Criteo can reach out to them in an emergency.

### d. Employee wellbeing

Criteo is committed to promoting employees' physical and mental wellbeing. To this end, regions are allocated a budget, distributed between the offices, to encourage employees to exercise. Sport and physical activities are part of Criteo's DNA and **each region normally provides employees the opportunity to exercise** with social and low-cost services by offering on-site wellness activities such as yoga, massages or sports subsidies to attend external sports clubs and gyms.

Unfortunately, Criteo's employees could not benefit from these services in 2020 due to the Covid-19 pandemic. Instead, we organized online events and initiatives to keep employees connected and offered free of charge online sport videos for the employees. Local events became as of October 2020 a Global program: FeelGood, aiming at keeping teams engaged and energized while working from home.

Moreover, most offices around the world provide standing desks to their employees without requiring a medical prescription or specific ergonomic seating, which requires a medical prescription. Based on individual needs, these special appliances enhance overall comfort in the workspace. As mentioned above, in the context of generalized teleworking due to Covid-19, Criteo decided to bear the costs of ergonomic seating and desks to ensure employees can work in the best conditions from home.

In addition, **Criteo is sensitive to the mental wellbeing of its employees**. It can be difficult for people to open up about mental health concerns, but Criteo is continuing to investigate options to roll out employee-assistance programs across all countries. For instance, to ensure a no-stress environment at the office and to be proactive on the subject, Criteo offers in a few countries an employee assistance service. This free and confidential external helpline service can be reached 24/7 for advice and support on a variety of issues. In other countries, employees can benefit from five free counseling sessions.

Also, when a specific incident occurs, such as the Covid-19 pandemic, **our Criteo's People and Workplace teams create tailor-made solutions** as soon as necessary in order to support

employees.

From the beginning of the year and thanks to a partnership with Eutelmed, Criteo's employees have access to mental health support. Eutelmed has made available through a 24/7 hotline to connect with a mental health professional for all Criteo's employees around the world (free of charge and in local languages). An appointment zone, with five scheduled appointments free of charge, or three online self-assessments are available as well. Lastly, Criteo's employees have access to videos, articles and can register to weekly webinars.

## 2. Employee relations

Communication and transparency are important areas of focus at Criteo.

### a. Internal communication

For internal communication regarding the Group's strategy, **Criteo hosts a company-wide "Global All Hands" event twice or thrice per quarter**, led by the CEO and members of the Leadership Group. During this event, they provide key business updates and allow employees to ask questions. Each department has regular functional "All Hands" to disseminate further information on key business priorities and performance metrics.

Changes involving systems, processes or other issues impacting employees are communicated in face-to-face sessions to supplement emails on the topic, allowing employees to ask questions or raise concerns. In addition, many groups have Slack channels to communicate real-time updates and feedback to employees. Social Media channels are also used to inform both external and internal populations. For instance, **in 2020 we implemented an internal social media, Sociabble to inform employees on a more interactive platform** (named internally Connect and Keep Engaging (CAKE)).

A **global intranet** is also available, gathering many functional portals to allow employees to easily access all information they would like: People Portal, Global Shared Service Center (finance), Internal IT, Marketing Knowledge, Communications portal, Legal, R&D & Product Events, Criteo Cares (CSR program), Compliance & Ethics, Data Quality, Travel portal, Risk Management.

Let's deep dive into the People portal as an example: it is an HR intranet portal meant to allow employees to have easier access to HR-related information, policies, contacts, including both global-level and country-level specific information. **Since it opened in 2019, our "People Portal" has been very popular** with around 200 employees consulting it per day. The People Portal was also leveraged for communicating to employees during Covid-19, providing a full section on various different Covid-19 topics to keep our employees informed.

Criteo also implemented "AskPeople", a user-friendly ticketing solution based on the Salesforce platform that is **used by employees to ask their HR-related questions** (policy, benefits, etc.). It's also used as an internal tool within the People team to allocate and track work between different teams. The initiative has been completely rolled out and is proving successful with about 16,000 tickets logged by employees in 2020. Internal IT has also the same kind of user-friendly ticketing solution to assist Employees with any IT-related questions/topics.

Finally, we have found **new ways to create networking among employees** and to **welcome new joiners in the context of the pandemic**. The onboarding program was upgraded into a fully remote onboarding program, leveraging new formats, trainings and activities for new joiners to feel comfortable and find their places in their respective teams and in the global

organization.

We also launched other programs like “Coffee Break with C-level” where each member of the Leadership group invites a small group of Employees - randomly chosen - to share a virtual coffee break via Zoom to ask questions and share with the C-level (the CEO, CPO, CTO, etc.). In 2020, 726 employees were invited to meet our CEO in person during 51 coffee break sessions.

To allow networking among Employees in the work from home context, we launched “Donut”: a matching system based on Slack channels, where two randomly chosen Employees are matching to share a virtual coffee together. It is working every two weeks, alternatively at country level or at the regional level (EMEA, APAC, AMER).

Lastly, during the Covid-19 pandemic, we reinforced internal communication by sending a weekly e-mail to Criteo employees to give them as transparent information as they need on the evolution of the situation and the health and security measures we've put in place. We also created a dedicated intranet space to share all the information related to Covid-19 security measures, ergonomics, well-being, work from home, office opening.

## **b. A culture of feedback and engagement**

We strive at Criteo to create a culture of feedback and continuous learning. We, therefore, promote feedback at different levels of the organization and as an important part of our company culture: for example, the People team supports managers and employees through dedicated trainings to give and receive feedback in a constructive way. That's how **in 2020, changes were made to the Performance Review process**. The annual cycle now includes more frequent feedback conversations between managers and employees, with the addition of a mid-year review for all employees.

This program is managed centrally by a program manager as part of the People team. First of all, it includes onboarding and exit feedback surveys, to get a good understanding of the onboarding experience at Criteo as well as an understanding of why people leave the organization and how we can improve as an employer. In some cases, face-to-face exit interviews with voluntary leavers are also used to pinpoint the main causes of turnover and better understand and address potential issues.

We also regularly give employees the opportunity to share their feedback on different aspects of their employee experience in a more formal way through employee surveys. As one of the main initiatives, Criteo continues its partnership with Glint to collect employee feedback and work on improving the employee experience.

**Once a year, Criteo indeed runs a company-wide engagement survey to measure engagement over time, understand the needs and areas for improvement.** The survey reviews scores from 30 questions and qualitative comments left by employees. In 2020, we started to gradually move to a “pulse approach” with short recurrent surveys to be more impactful. As a first step, we introduced a pulse check in Q2 to complement the full survey in Q4. **In 2020, the global engagement score is 73 on a scale from 0 to 100**, compared to an external industry benchmark of 74. 75% of respondents recommended Criteo as a great place to work. 73% of respondents said that they were happy working at Criteo.

The main strengths identified through the engagement survey were the following on a scale from 0 to 100:

- **Respectful treatment (87):** the survey respondents declared that they feel treated with respect and dignity at work.
- **Manager (86):** the survey respondents declared that they would recommend their direct manager to others.

- **Teamwork (83):** the survey respondents confirmed that they are satisfied with their work teams (the people they work with the most).
- **Authenticity (82):** the survey respondents confirmed that they feel comfortable being themselves at work.
- **Feedback (80):** the survey respondents say that their managers provide them with feedback that helps them improve their performance.

Results are reviewed at different levels of the organization and all managers have immediate access to the feedback from their teams and are encouraged to have conversations with their teams about strengths and areas of improvement. Results are also reviewed by the People and the Management team, and at the department and organization level. At all levels, managers are encouraged to openly share and discuss the results and involve employees in making improvements. At group level, a plan for improvements was approved by the management team and communicated to employees through written communication and at the Global All Hands meetings.

Similar to previous years, **in 2020, Criteo also used a manager survey**, where employees provide feedback about their direct managers. Based on the results, managers can identify areas for professional development. Every manager gets a detailed report of the feedback provided by their teams. Results are reviewed and action plans defined for managers with the People Experience team. People Partners also conduct reviews of high-level results per function with Executives.

To help managers and employees achieve their goals and empower them in a collaborative way, we provide all Criteo employees with unlimited access to the LinkedIn Learning platform.

In 2020, we also gave employees the opportunity to share their feedback on the Covid-19 measures implemented by Criteo. Two Covid-19 surveys were rolled out in June and September, and are displayed in the Health & Safety section.

### c. Employee recognition

**Spotlight is Criteo's global recognition program**, available for all employees within a platform. It launched in 2019, and the goal is to reward every small or big thing employees are doing at Criteo.

To do so, we have put into the program a variety of rewards. Some are social recognitions ("Merci") to recognize everyday great contributions, point-based recognitions ("Applause") to reward great achievements performed during a month, and also a quarterly Standing Ovation exercise to reward exceptional achievements.

The platform also allows us to recognize great actions performed for Criteo Cares or even to celebrate employees' Criteo anniversaries. **With an activation rate above 95%, the platform is a success** and is used across regions and departments. More than 66,000 recognitions have been received by Criteos since the launch.

Several events around Spotlight have been done since launch to ensure everyone knows about it and use it the best way possible (e.g., Black Friday celebration, Christmas celebration, Spotlight 1st year anniversary, etc.).

With remote working it's more important than ever to ensure employees are properly recognized, on a regular basis for all the great things they achieve.

### 3. Inclusion, diversity and equal opportunities

In 2020, the Black Lives Matter movement in the United States enhanced again the importance for us to **keep Inclusion and Diversity (I&D) at the core of Criteo's values**, with clear principles embed in our HR processes, our company culture, and across our organization globally.

In 2019, Criteo's actions were mainly focused on gender equality, which was identified as a priority issue especially for our R&D teams. In 2020, keeping gender equality as a key area of improvement, we took steps to broaden the scope of our I&D roadmap to other types of diversity such as social diversity, disability and ethnical diversity.

That's how **one of the first decisions made by our CEO Megan Clarken was to open a position for a head of I&D at Criteo**. The new head of I&D has been hired and his role is to develop and drive Criteo's commitments to I&D.

Although events such as the "Meet up Criteo talks I&D" had to be cancelled in 2020 because of the pandemic, Criteo continued leading in 2020 many Inclusion & Diversity initiatives, presented in the next pages.

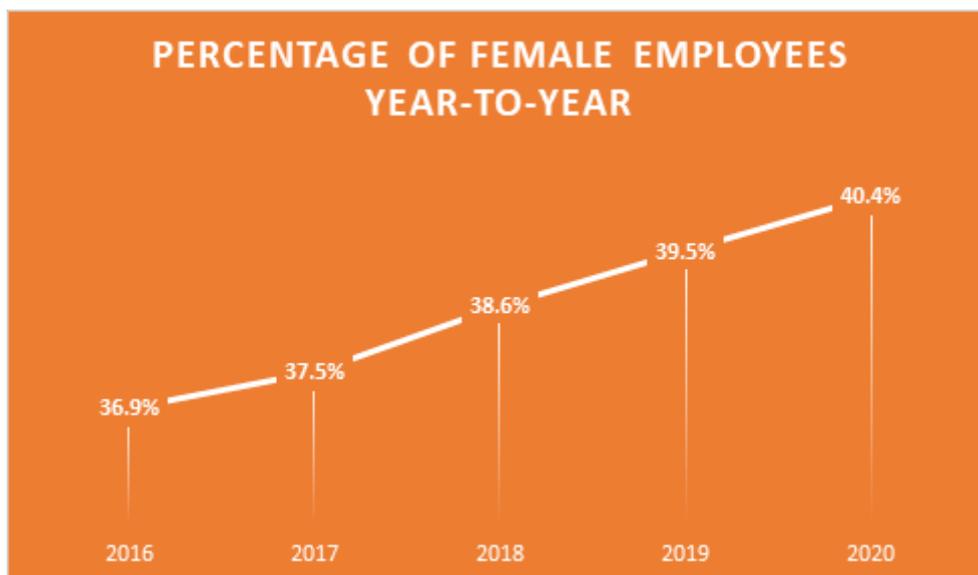
#### a. Gender equality

*Promoting gender equality at all levels of the company*

Criteo is taking steps towards gender balance and equality with an increase in female employees in 2020 in both the general population of employees, as well as director positions.

Gender equality	Total employees		Managers		Directors and VP (Vice President)	
	2019	2020	2019	2020	2019	2020
Male	1,552 (61%)	1,402 (59%)	365 (66%)	341 (69%)	158 (71%)	151 (70%)
Female	986 (39%)	964 (41%)	184 (34%)	153 (31%)	64 (29%)	66 (30%)
<b>Total</b>	<b>2,538</b>	<b>2,366</b>	<b>549</b>	<b>494</b>	<b>222</b>	<b>217</b>

Our long-term efforts to attract and retain female talents over the five past years are bearing fruit, as shown in the graph below:



Criteo aims to hire talent without gender discrimination and promote fair opportunity regardless of gender. In 2020, 39% of employees promoted were women, in line with the share of women employees in the company (41%).

It is worth mentioning that **end of 2019, Megan Clarken took up the CEO position at the head of the company, becoming one of the few women worldwide leading a global IT company.** In 2020 as well, Rachel Picard was appointed as chairman of Criteo's board and Sarah Glickman as Chief Financial Officer. These meaningful steps further demonstrate Criteo's voluntary approach to promoting gender equality including in top management.

#### *Our global roadmap for gender equality*

Criteo is leading several gender equality initiatives that are part of a global roadmap. In 2020, the following key actions can be highlighted:

- The **launch of a global Diversity Dashboard** to follow the evolution of recruitments when it comes to gender equality. This dashboard will allow each department to monitor quarterly the distribution of workforce by gender and by age (evolution of headcount, recruitments, etc.). It is aimed at better understanding and fostering diversity within the workforce. In future years, We intend to set targets in terms of diversity recruitment, promotions and training, at team level and global level. In the United States, this Diversity Dashboard will also include indicators and targets related to ethnical diversity (see more in the BIPOC section).
- In 2020, we decided to extend the **secondary care parental leave** for employees from two weeks to four weeks. Established in France, Spain, Canada, Brazil and in the United States for now, this extended leave will be proposed to all employees across our locations worldwide in 2021, often going much further than local regulations when it comes to leave for the secondary parents. In line with our I&D principles, it will be offered to all our employees who are secondary parents, regardless of the gender or marital situation.
- In France, a **gender equality agreement** was signed in 2014 and renewed in 2018 for three years. It aims to build awareness around gender equality matters and is a warranty of compliance with the principle of non-discrimination. It promotes equal pay, equal access to training and equal opportunities for career development and promotions. It also encourages diversity in recruitment processes. Several measures have been put in place by Criteo in order to achieve these goals, such as prohibiting unjustified pay differentials, increasing the number of promotions granted to women to

30% of the total amount of promotions awarded by the company and increasing the proportion of women in all the different types of positions and pay ranges to at least 29% the first year, 31% the second year and 33% the third year.

- The specific **Inclusion & Diversity training programs** implemented for recruiters in 2019 (against unconscious bias, etc.) is currently being upgraded. For that reason, they did not take place in 2020.
- The **Women@Criteo community** was relaunched in 2020, as part of our Criteo Cares initiatives (see below) and Criteo is planning to revive the Women in Tech community in 2021.
- We launched a **new partnership with 50inTech in 2020** to raise awareness for and support women tech leaders through skill development. As part of this commitment, Criteo participated in the "What I really really want" bootcamp.
- Lastly, as a **signatory member of the Tech for Good Call**, Criteo took strong commitments for the improvement of women representation in leadership positions (see below).

#### *The R&D roadmap for gender equality*

Criteo's R&D department, accounting for nearly 600 employees in France and the United States, has identified gender equality as a priority issue in terms of talent acquisition and people management. For this reason, the department developed its own Inclusion & Diversity roadmap to complement Criteo's global actions.

In 2020, this roadmap included the following key actions:

- Since 2019, the R&D team has been reviewing its **recruitment processes to ensure inclusivity in terms of gender equality and representation**. We are notably revising the wording of job descriptions to make them appeal more equally to female candidates. In future years, the team intends to implement a new process to collect feedback from interviewees and thus continue improving recruitment processes in line with candidates' expectations.
- We are also striving to **raise awareness in the Tech sector** on the issue of gender, seeking to support women in the Digital/Tech/Science fields. In previous years, we regularly organized initiatives to raise awareness both internally and externally, wishing to build a worldwide community of R&D Tech women engineers. Because of the Covid-19 pandemic, those events could not be held in 2020.

#### **Focus: some 2020 actions of the Women@Criteo Community:**

- **Each for Equal: A Q&A with our CEO, Megan Clarcken.** When it comes to building an environment that promotes equality, everyone needs to play an active role. In March 2020, we spoke with our CEO, Megan Clarcken, to find out how she's seen equality evolve throughout her career and how she believes we can create a more equal workplace at Criteo.
- In 2020, on behalf of Criteo, Megan Clarcken signed the Tech For Good Call led by the French President Emmanuel Macron. As a prominent member of the Tech For Good initiative since 2019, Criteo committed to empowering staff from all backgrounds to fulfill their potential and **achieve 30% of women in leadership roles by 2022 as well as 30% of women in tech roles by 2030.**
- Megan has been **featured as part of the HERoes 100 Women Executives List for 2020** for her actions promoting I&D:

**Megan has been featured as part of the HERoes 100 Women Executives List for 2020!**



**IMPACTFUL**



We are excited to announce that our CEO, **Megan Clarken** has been featured in INvolve's HERoes 100 Women Executives List for 2020 for her work in championing diversity and inclusion in business.

The global HERoes Women Role Model Lists recognizes and celebrates business leaders and future leaders who are breaking down barriers at work and driving change for gender diversity. Megan was judged on the influence of her role, her impact on gender inclusion and equality inside and outside the workplace and her business achievements. She is actively working to create an environment where women and other underrepresented groups can comfortably bring their best professional selves to work.

**#HERRoleModels20**

*Join us in congratulating Megan on this well-deserved recognition!  
Feel free to check out the full list [here](#)*



### *Inclusion of LGBTQIA+ people*

When addressing gender equality issues, Criteo also considers the inclusion of LGBTQIA+ people in the company. Those initiatives are mostly carried out by our internal Pride Community.

#### **Focus: some 2020 actions of Criteo's Pride Community:**

In 2020, the Pride month initiative provided an opportunity for employees to learn more, encourage the spirit of togetherness, and support the LGBTQIA+ community and diversity more generally.

- **“Inclusion & Diversity Presentation with MDC”** - The Michigan Diversity Council presented a I&D talk about unconscious bias, identifying challenges of the LGBTQIA+ community, and how to support the LGBTQIA+ community.
- **The ABC Guide:** There are a lot of unknown terminologies in the LGBTQIA+ world. This guide explains the basics of respectful and inclusive language when communicating with and referring to LGBTQIA+ people. Using inclusive language means we can demonstrate respect in and outside of the workplace.
- **Our Pride stories:** What is an LGBTQIA+-friendly workplace? Several employees from Criteo talked about discrimination related to their sexuality and gender identity throughout their career, what the ideal world in the future looks like, and more.
- **Pride posters:** In June, we have asked our leaders to answer the question "What does diversity mean to you?"

“Diversity starts with you, & then it adds me, & them & all. Diversity is a tapestry. A tapestry is not a tapestry if it’s just one square - it’s beautiful if it’s many. A tapestry is not balanced if the blue squares are grouped together & the green squares are grouped together - it’s beautiful when it’s mixed. We are all diverse in our own way, we are all special.

**Diversity is accepting that & coming together in harmony. All of us.”**

Megan Clarcken  
CEO

Criteo Cares

- **LGBTQIA+ Quiz** – We asked employees to test their knowledge in order to raise awareness about inclusion. Indeed, a major barrier to the visibility of minorities is that many people doubt that there are inequalities in the workplace. This was a great way to educate employees.

## b. Social diversity

In 2020, Criteo reassessed its ongoing partnerships with various organizations, aiming to increase focus on the most impactful projects. **Three major partnerships were concluded in 2020 in France, with the organizations My Future, Article 1 and Simplon.**

- **“My Future”**: our partnership with this association is centered on raising awareness of career opportunities offered by the tech industry in underprivileged neighborhoods. It includes meetings with third year college students in schools located in underprivileged areas to review tech jobs and answer any questions.
- **“Article 1” and “Simplon”**: more than 15 volunteers from Criteo committed to actions with those two organizations in 2020. As part of the Article 1 initiative, our volunteers engaged in long-term mentoring (3 years) to provide students from socially diverse backgrounds with professional training and resources. The Simplon initiative is aimed at helping students prepare for interviews and behave professionally through workshops or face-to-face meeting led by Criteos.

Those partnerships are currently active in France, but we are seeking to expand these actions in other countries, primarily the United States, with the support of our Education Community (see below).

### **Focus: some 2020 actions of the Education Community:**

The internal Education Community's objective is to address inequality of opportunity through education.

At Criteo we believe in applying our skills, experience, and expertise to serve others. Volunteers from the Education community have the opportunity to coach young students, train middle school students in coding, and accompany high school students in their orientation, among other initiatives.

Thanks to the feedback from our partnerships in France (see above paragraph), the Education community, with sponsorship from Criteo's executive team, **recommends that Criteo extends these partnerships in 2021 and implement similar initiatives in the US.**

### c. People with disabilities

Our People teams and our internal Criteable community worked in 2020 on **initiatives to better include people with disabilities in the workforce**. The project was officially launched in March 2020, when a list of key actions to implement was defined by volunteers from different teams (e.g. administrative processes, workplace adaptation, recruitment processes...). While the Covid-19 situation put a halt to some of those actions, particularly those linked to the workplace environment, several others were still carried out to completion.

In particular, **many awareness-raising actions were implemented** such as :

- a **Disability Day in September**, which was held virtually in France.
- an **International Day of Persons with Disabilities on December 3<sup>rd</sup>** aimed at raising awareness, where employees could partake in a quiz and discussion with an external speaker.
- the implementation of a **toolkit for managers** to better welcome and support employees in their teams, along with the creation of a disability page on Criteo Cares internal website.
- the creation of a **network of volunteers called "Criteablers"** to become points of contact in teams, raise awareness about disability in teams and welcome people with disabilities (see below).

In the future, Criteo intends to increase the number of employees with disabilities in the workforce by working with specialized agencies.

#### **Focus: some 2020 actions of the Criteable Community:**

- **The Criteable Community (or Network):** created in 2020, the community currently consists of a team of eight people, called "Criteablers", who have volunteered to be Criteo's disability referents. They organize events (like talks, quizzes, etc.) and can also be contacted by Criteo employees who need help for administrative procedures (e.g. in France to be recognized as an employee with a disability and benefit from associated measures) or simply to talk.
- **Awareness campaigns with concrete actions:** actions such as the "Criteable quiz" and the "Did you know campaign" allowed Criteo employees to better understand people with disabilities, to become allies for them, and to share their knowledge and sensitize their colleagues, family, and friends.
- **International Day of Persons with Disabilities:** during this day in December 2020, we hosted an exciting discussion with our guest Tanguy Prouvost, an author with a disability. This event has been introduced by the executive sponsor of the Criteable Community and we had more than 60 attendees.

#### d. BIPOC<sup>2</sup> Community

Inclusion and diversity has been a crucial topic of discussion for Criteo this year, **especially with the resurgence of the Black Lives Matter movement globally**. Initiatives were carried out in parallel to (and in line with) other I&D actions to specifically address the matter of racial and ethnic discrimination.

As soon as July 2020, we were running in the United States a pro bono campaign for a non-profit organization involved in the Black Lives Matter movement and dedicated to anti-racism work and fundraising. We also supported the fight for racial equality in partnership with the Ad Council, by amplifying the messages of #LoveHasNoLabels and #BlackLivesMatter on social media with pro bono media campaigns.

As part of our **Voyager Program**, two Criteos from the business teams were picked to **work full-time on I&D issues in the United States** from summer 2020 to December 2020. We have defined a local roadmap for one year which we expect to develop and expand in the future.

In 2020, several initiatives were organized in the United States in terms of Inclusion and Diversity applied to the BIPOC community, including but not limited to:

- An **audit of documentation, tools and language** used at Criteo is currently in progress, in order to become more inclusive in the words we use and the messages we circulate.
- The **recruiting processes** have been reviewed by the Talent Acquisition and People teams to be more inclusive and ensure that no job candidates and future employees could feel discriminated.
- Additional reminders for **counseling and mental health services** for employees who would feel the need for such support.
- People teams also worked and are still working very closely with Criteo Cares Communities, in particular with the **BIPOC community** (see below). Key activities include five listening sessions aimed at welcoming anyone who wants to listen or talk about their experiences related to diversity and inclusion. The BIPOC community, organized by volunteers from the organization, began to set up internal discussions about race and discrimination. Community leaders were also assigned to speak with Talent Acquisition and People teams about new actions that could be implemented. More details about the BIPOC community actions are presented below.
- An update of Criteo's **unconscious bias training** (in the Code of Conduct training) is in progress, with the purpose of including more specific components related to ethnicity. A pilot has been rolled out in December 2020.
- A **Inclusion & Diversity survey** including a focus on ethnicity, rolled out in 2020, which will help us better understand areas of improvement, employees' expectations, and actions we should implement. The survey obtained a 63% response rate and 265 comments. Overall rate was 72% favorable, with an external company benchmark of 73%. This is positive; however the overall sentiment from the comments is mixed with comments highlighting the need for more diversity. The I&D Voyagers plan to create a Thesis as a conclusion to the program in December to be reviewed as part of the 2021 I&D Roadmap.

As a result of the many challenges in 2020, Criteo was especially careful to **provide employees in the United States with adequate support** with the help of professional agencies (such as counseling, listening sessions, etc.). In particular, guidelines were issued for management on how to check in with their teams, to ensure understanding and flexibility on their part.

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<sup>2</sup> Black, Indigenous, and People of Color

**Focus: some 2020 global actions of the BIPOC Community:**

- July 2020: Criteo Cares launched a **donation matching campaign** for the NAACP's Legal Defense And Education Fund. Total donations exceeded \$13,600.
- October 2020: we hosted a special training on **Discrimination & Every Day Racism Awareness** with Dr. Britta Schellenberg & Megan Clarcken. We want to create a truly diverse and inclusive workplace, and it is more important than ever that we come "together" and always remain "open". Some of us also face daily discrimination and racism that often goes unrecognized but still poses an issue. People face discrimination based on skin color as well as name, gender, age and sexual orientation. We want to be able to identify and act against these discriminations to foster an open and transparent culture that celebrates our value of "together".
- **I&D Voyagers** : The mission of the I&D Voyager program at Criteo is to understand the current state of diversity, equity and inclusion at Criteo and to use this information to create a working environment where all Criteos can thrive. We intend to advocate for and amplify our community groups and facilitate collaboration between Criteo Cares and leaders across the organization to bring impactful and lasting social change to Criteo and the communities it touches.

In the future, we plan to continue to develop our actions for the BIPOC community. For example, we want to explore implementing "Courageous conversations" within the company, following the great example set up by our CEO Megan Clarcken on racial diversity, which was shared with all employees.

**e. Non-discrimination and prevention of harassment**

Criteo's Code of Business Conduct and Ethics is applied across all locations and includes principle of non-discrimination.

Consequently, Criteo applies its equal opportunity policy (also called non-discrimination policy) which strictly forbids all forms of discrimination, whether at the recruitment stage or afterwards with regard to promotions, salary increases and benefits, and specifies that no employee may be discriminated against on the basis of gender, race, ethnicity, religious belief, disability, national origin, veteran status, marital status, or sexual orientation.

Today 85 nationalities are represented in Criteo's global workforce. It is therefore very diverse, with a strong mix of local talent and people from different cultures and backgrounds.

While the majority of our workforce is less than 40 years old (82% of employees), we are careful to provide equal opportunities to all without discrimination on the basis of age, be it through external hires or internal promotions.

<b>Hires and promotions of employees above 40 years old</b>	<b>2019</b>	<b>2020</b>
- Share of employees over 40 years old in hires	8%	8%
- Share of employees over 40 years old in promotions	9%	11%

Criteo also recognizes the importance of freedom of speech for employees. Consequently, no

opposition or discrimination is directed at employee representatives.

Our internal regulations provide a policy and measures to prevent moral and sexual harassments in all of its locations, in compliance with local legal requirements. The principle of the harassment ban is also included in the company's Code of Business Conduct and Ethics.

### iii. Reduce Criteo's environmental impact

At Criteo, employees care about the environment. Although there is currently no formal global environmental policy in place, we are aware of the environmental footprint of our activities and aim to minimize it.

The nature of our activities leads us to implement tangible actions for several aspects such as management of the data centers and its data resources, promotion of green offices, and raising awareness among employees on sustainable practices that will prevent harmful consequences for the environment or society.

In addition, in compliance with the French law "PACTE Act"<sup>3</sup>, Criteo's shareholders approved the Company's request to modify the Company's by-laws so as to include that the Board shall take into account social and environmental aspects when defining the Company's strategic orientations. The amended by-laws went into effect in June 2020.

## 1. Environmental impact of Data Centers

### a. Energy consumption and GHG<sup>4</sup> emissions due to data centers

Criteo's operations rely on large data center units and several smaller networking rooms, also known as Points of Presence (POPs). POPs are similar to small-sized data centers. In 2020, Criteo installed its servers in 13 data centers worldwide, all of which belong to external service suppliers. Among those 13 data centers, 10 are data processing centers and the remaining 3 host network POPs. **Criteo's server infrastructure accounts for one of its largest environmental impacts.**

A team dedicated to capacity planning is in charge of ensuring optimal allocation of infrastructure resources according to business objectives: this means that **human resources are dedicated full time to optimizing Criteo's infrastructure usage** regarding costs and power usage. As a result, robust growth forecasts have been implemented, establishing reliable budget and actions to reduce costs and energy consumption.

Criteo is working to enhance **sustainable practices among vendors** for both services (hosting and hardware recycling) and hardware procurement. For each new Criteo project, the company releases a Request for Proposal (RFP) to several potential partners, and one of the main criteria of the decision matrix is labeled as "Eco Responsibility". This criterion encompasses various questions about the energy-saving processes, the source of energy of the data center, its Power Usage Effectiveness (PUE)<sup>5</sup>, which shouldn't exceed a rate of 2, and other eco-related topics.

Electricity consumption in Data Centers (DCs)	2019	2020	Var.
Total electricity consumption	62,234 MWh	68,511 MWh	10%

<sup>3</sup> Plan d'Action pour la Croissance et la Transformation de l'Entreprise (Action Plan for the Growth and Transformation of Companies)

<sup>4</sup> Greenhouse gas

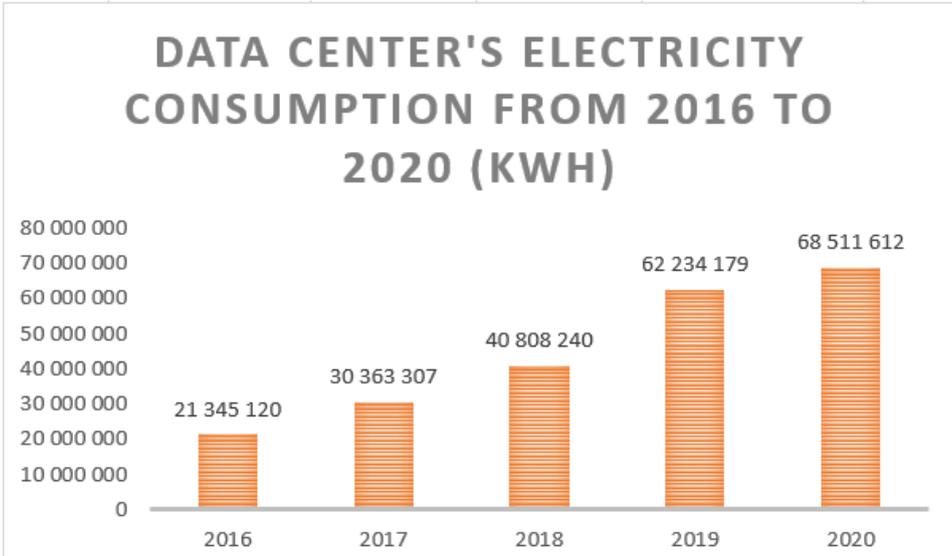
<sup>5</sup> PUE is the ratio between the total electricity consumed by the data center and the electricity consumed specifically by the servers, meaning that if a data center has a PUE rate of 2, it consumes the same amount in auxiliary utilities (cooling, lighting, etc.) as the core consumption of computing devices.

Share of electricity from renewable energy sources	84%	92%	9%
Share of data-center consumption compared to total consumption (including offices)	92%	95%	3%
CO <sub>2</sub> emissions generated by data centers (post compensation efforts) <sup>6</sup>	6,991 tCO <sub>2</sub>	3,693 tCO <sub>2</sub>	-47%

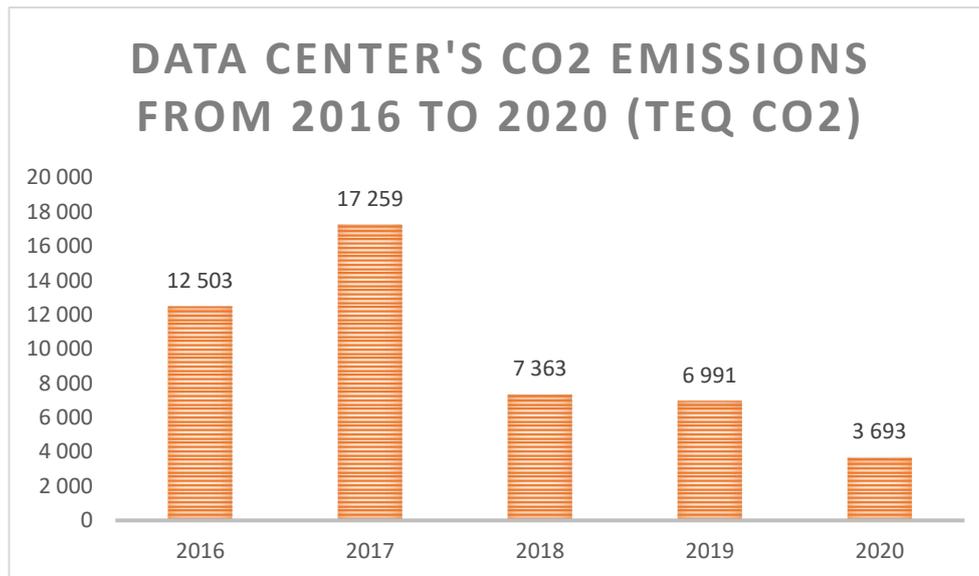
The evolution in data center electricity consumption in 2020 is due to the following:

- The activity growth triggered the need to replace Japan's historic data center, where capacity was no longer sufficient. This caused the accounting of the emissions of both DCs as of summer 2020 (opening of the new Japan DC) until the migration is complete and the historic DC can close (planned for May 2021). This configuration will temporarily increase the global consumption, but Criteo chose to migrate to a more virtuous DC, since it has a 100% renewable energy supply.
- The Sunny Vale DC (United States) was closed in June 2020.
- The catalog of internal servers was thoroughly renewed (change of processors). The new servers are much more efficient: twice as many requests per second for one Watt consumed (QPS/Watt), which also contributes to the reduction of our power consumption.

While the electricity consumption of data centers has increased since 2016 (as a result of activity growth), the related CO<sub>2</sub> emissions are controlled and have kept decreasing thanks to Criteo's efforts in reducing the carbon footprint, such as **relying on renewable energy sources and increasing our compensation efforts** (as shown in graphs below).



<sup>7</sup> This ratio is valid only for countries having a low emission factor like France.  
<sup>6</sup> Regarding the calculation method of CO<sub>2</sub> emissions, for data centers totally powered with renewable energy or for which compensation using renewable energy certificates is performed, the emission factor is considered to be zero. For the other data centers the local factor is used (for more details, see methodological note).



**Criteo intends to have 100% of its Data Centers and POPs energy compensated using renewable energy sources or certificates by 2021.**

In 2019, Criteo continued to improve the environmental impact of data centers and started to compensate for the emissions of two data centers. As of 2020, 92% of the data centers' energy consumption is compensated by renewable energy certificates. Since 2020, Criteo compensates 100% of the Hong Kong Data Center energy (which was not the case previously). However, Criteo does not plan as of now to compensate the remaining Japan Data Center because of its compensating rules which are not in line with our own<sup>7</sup>.

Criteo is currently working with a consulting firm to **perform a complete GHG assessment that will cover all emission scopes 1, 2 and 3 for Data Centers**<sup>8</sup>. Indeed, emissions related to the manufacturing of Data Centers are estimated to account for around 75% of the CO2 emissions over the life cycle of a Data Center, while only 25% are related to actual usage<sup>7</sup>.

The main interest of this analysis for Criteo is to better understand the carbon footprint of the equipment purchased and the real impact of scope 3, thereby confirming the relevance of Criteo's strategy which is relying on DCs with the longest possible lifespan to cushion the impacts of manufacturing.

In addition to carbon emissions due to electricity consumption, Criteo is also working to monitor or estimate the emissions generated by leakages from refrigerant systems in data centers for upcoming years.

## **b. E-waste management**

Since 2016, in order to reduce the amount of e-waste<sup>9</sup> generated in the data centers, Criteo asked for a guaranteed extension for the servers from three to five years.

**We work with a subcontractor to handle decommissioned equipment**, which is operating in all the cities where Criteo's offices are located except for Sao Paulo, Istanbul, and Moscow. The

<sup>7</sup> Criteo only purchases the compensation certificate when the power plant is connected to the power grid of the data center's electricity provider, and the energy should be produced the same year, which was not the case for Japan

<sup>8</sup> The emission scopes correspond to three types of greenhouse gas emissions: direct emissions linked, for example, to the use of fossil fuels (scope 1), indirect emissions linked to energy consumption such as electricity (scope 2), and finally other indirect emissions linked, for example, to the manufacturing and use of products (scope 3).

<sup>9</sup> Electronic waste, or commonly called "e-waste", describes discarded electrical components or electronic devices.

majority of this equipment can be reused and is resold on a second-hand market, while the remainder is considered as waste, which can be partly reused or recycled.

In 2020, **Criteo produced 65.5 tons of e-waste compared to 66.4 tons in 2019**. Part of this e-waste is due to the decommissioning of one data center.

Other e-waste from the workplace, such as employees' phones, is not discarded at end-of-life but given back to a reseller.

Lastly, Criteo is engaging with external stakeholders on the topic of circular economy in the IT industry. For instance, in 2020 we launched an internal working group with occasionally a few external contacts to discuss innovative solutions regarding the reconditioning of obsolete IT equipment. The general aim of such initiatives would be to bring together organizations in the IT industry to work together on viable circular economy solutions for IT equipment.

## 2. Environmental impact of Offices and Travel

### a. Green offices

While Criteo does not own the buildings it occupies, there is a company-wide commitment to limiting their environmental impact.

This starts with the selection of our buildings. Each office location is reassessed roughly every five years, when the contracts with landlords are set for renewal. **This assessment takes into account increasingly demanding environmental factors.** The global action plan is to switch to better offices in terms of environment whenever possible: ideally certified LEED or BREEAM. Thus, many of our offices were built according to high environmental quality norms for building, for example:

- In Paris, the building housing Criteo's headquarters is NF HQE<sup>10</sup> certified,
- The Singapore office is located in a building that has been awarded the prestigious Green Mark Platinum Award,
- The Miami, Barcelona and Stockholm offices are located in a LEED<sup>11</sup> Gold building property while the Boston office is part of a LEED Platinum building,
- Criteo's Los Angeles building was honored by Culver City's City Council and local utility representatives as a Sustainable Business- Innovator,
- Our London office is located in a BREEAM<sup>12</sup> certified building.

**In 2020, the equivalent of 68% of our offices is covered by a green certification based on offices areas in m<sup>2</sup> (compared to 61% in 2019)**

The issues that are managed by the landlord, such as waste management or heating for example, also balance the final choice. The environmental performance of buildings has thus become a key decision factor for Criteo.

### b. Energy consumption due to offices

Criteo has also taken numerous actions aimed at reducing energy consumption of offices.

In several offices, lighting is automatically switched off at night or motion sensor activated.

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<sup>10</sup> NF HQE: Norme Française "Haute Qualité Environnementale"

<sup>11</sup> LEED: Leadership in Energy and Environmental Design

<sup>12</sup> BREEAM: Building Research Establishment Environmental Assessment Method

Highly energy-efficient LED lighting is installed across many locations where feasible. The default settings for all laptops are also configured to reduce energy consumption from employees' IT equipment, by going into sleeping mode when the laptop is not used and into low battery mode (lower energy consumption) when it is not plugged.

Air conditioning is also a source of energy consumption that Criteo aims to monitor and control. For example, the air-conditioning system is automatically shut off or significantly reduced during the evening after normal working hours in several offices. Heating, ventilation and air conditioning in major offices such as New York and Tokyo are set to run between reasonable working hours with adequately preset temperature.

In the Milan office, electricity is 100% provided by Lifegate, a green energy supplier, which also plants trees to compensate for energy transportation pollution.

Electricity consumed in offices	2019	2020	Var.
Total office electricity consumption	5,650 MWh	3,522 MWh	-37.7%
Total per employee	2.23 MWh/employee	1.34 MWh/employee	-39.6%
% from renewable energy sources	19.2%	19.1%	-0.2%

This drastic drop in office energy consumption in 2020 is of course due to the widely implemented practice of working from home in our offices across the world, as a consequence of the Covid-19 pandemic.

Due to the complexity of obtaining data for small offices, actual electricity consumption has been collected only for offices with more than 50 employees. For other offices, accounting for about 6% of electricity consumption, data is estimated based on a ratio per employee.

One of Criteo's offices (Ann Arbor) is also using natural gas for heating, however, based on an assessment performed by Criteo in 2019, the gas consumption is not significant and represents about 5% of our office energy consumption. For this reason, it is not reported nor taken into account in the calculation of our carbon footprint.

**c. GHG emissions due to offices and travel**

The most significant greenhouse gas emissions come from the electricity consumed in data centers and offices but also during business trips<sup>13</sup>.

Criteo tries to limit emissions by avoiding flights whenever possible, attending video conferences instead of physical meetings, and not offering company cars in employees' compensation packages. We are also looking at ways to minimize the use of individually owned private cars. Many of Criteo's offices are located in areas easily accessible by public transportation and do not have a parking lot, therefore discouraging employees from commuting with their private cars. In many of Criteo's offices, public transportation is subsidized to promote public transportation usage.

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<sup>13</sup> According to the greenhouse gas protocol methodology, Criteo can classify its greenhouse gas emissions associated with electricity consumption and business trips respectively to scope 2 and scope 3.

Before the pandemic, working from home was also allowed in several Criteo offices, either in accordance with local regulations and policies or depending on practices in the country for our sector of activity.

CO <sub>2</sub> emissions	2019	2020	Var.
From electricity consumption (offices) – in tCO <sub>2</sub>	1,287 tCO <sub>2</sub>	887 tCO <sub>2</sub>	-31%
From business trips <sup>14</sup> – in tCO <sub>2</sub>	7,741 tCO <sub>2</sub>	1,234 tCO <sub>2</sub>	-84%
<b>Carbon footprint per employee (offices consumption + business travel) – in tCO<sub>2</sub>/employee</b>	<b>3.6 tCO<sub>2</sub>/employee</b>	<b>0.8 tCO<sub>2</sub>/employee</b>	<b>-77%</b>

The decrease in carbon emissions from business trips are a reflection of the pandemic's impact: business travel freeze.

**With the pandemic, remote working has become the norm for all employees in 2020.** Therefore, business travel and commuting have been greatly reduced. Both account for an 84% reduction in our travel-related emissions. We expect for those impacts to be long-lasting, as new ways of working become more widespread.

In parallel, employees are relying more on remote working tools such as Zoom, which also generate energy consumption and GHG emissions. In 2020, Criteo started monitoring the use of the Zoom platform by employees (e.g. number of connections) in order to be able track the future impacts of the use of such tools.

**d. Office waste**

All of our offices sort and recycle waste whenever possible. We have equipped most offices with waste recycling bins, and some have battery recycling containers. In addition, clear signs about waste classification procedures are on display in most of Criteo's offices to ensure employee compliance. To limit waste, employees are encouraged to use mugs instead of disposable cups in several offices.

A **“Zero Waste” initiative** was launched in 2018 in the Americas. This initiative, which took the Zero Waste International Alliance (zwia.org) framework as a reference point, was based on audits of waste streams and the introduction of actions such as the removal of individual non-sorted waste bins, the removal of single-use supplies such as cups or plastic bags, the installation of recycling bins in all locations, signage, or awareness actions related to food waste. Composting solutions were also made available in several buildings where allowed.

While we had planned to extend this campaign to EMEA and APAC offices in future years, the pandemic has put a stop to the “Zero Waste” initiative. We aim to restart on those actions as soon as work conditions will allow employees to go back to work in offices.

**e. Responsible procurement for offices**

We are taking steps to **implement an approach to responsible purchasing for furniture, office supplies and events**, by including sustainable criteria in the choice provided (compostable, recycled, etc.). For instance, Criteo's SHIFT event was produced in three locations without any

<sup>14</sup> In 2020, emissions due to train travel were added to the reporting scope in addition to plane emissions.

plastic disposable cutlery and almost no plastic or disposable furniture. Even though this is not our main area of impact, we are aware that global companies such as Criteo have a responsibility to challenge the ecological impact of the small supplies they are using including cups, pens, disposable cutlery, etc.

**As for furniture, Criteo established a design guide outlining guidelines regarding a 'recycle, reuse, or relocate first' approach.** During the refurbishment of an office, the last choices to be considered are to donate, and in last resort only, to dispose of used furniture. Criteo looks at the best sustainable options offered by suppliers (for instance, Paris chairs that have a ten years guarantee), in order to close the lifecycle loop.

## f. Employees' green initiatives

Historically, Criteo has relied a lot on local, internal or external initiatives to promote environmental responsibility, led by individual offices or employees.

Due to its office activity, Criteo's main resources beside energy are paper and water. The nature of Criteo's business allows employees to promote a paperless work environment and if printing is necessary, employees are advised to reuse one-sided printed paper or print double-sided when possible. Regarding water, Criteo has deployed sustainable development practices in most offices by using sensor-equipped faucets and two-level flushing toilets.

Until recently, Criteo's campaigns focused on environmental actions were launched mostly on local or regional basis. As of 2020, Criteo Cares initiatives are spread across all business unit and countries.

### **Focus: some 2020 actions of the Green Community:**

- **Planet Tech Care:** Criteo signed the "Planet Tech Care" manifesto in October 2020, partnering with other French tech businesses and Syntec Numérique (a leading industry body in tech). A French initiative, the rationale behind "Planet Tech Care" is to help businesses leverage digital technologies in order to reduce their environmental footprint.
- **Tree Nation:** in December 2020, Criteo extended the work we were doing with Tree Nation by creating a "Criteo global forest". From now on, Criteo Cares will plant trees in the Criteo Forest to congratulate Criteo employees active in Criteo Cares communities. For example, at the end-of-year Criteo Cares organized a big quiz and planted a tree in the forest for every employee who participated in the quiz.
- **"Fresque du Climat" (Climate Collage):** in December 2020 Criteo Cares organized our first virtual workshop with the Climate Collage, a climate change awareness workshop adapted to the issues of our sector of activity. We would like to organize two other editions and train our own facilitators internally so that it is Criteo employees themselves who can organize these workshops with their colleagues. A good way to raise awareness while creating links with others, even from a distance. Also, the participants will be able to share their ideas and suggestions to improve the company and make our ecological commitments grow.

## 3. Managing climate risks

While tech companies may not be exposed to critical climate risks, **we are aware of our need to address the consequences of climate change in future years.**

Issues such as an increase in energy prices or a rise in extreme weather events which may affect data centers or our suppliers' activities could, for instance, have a direct impact on our processes. From a business perspective, consumers' behaviors are evolving toward more environmentally conscious habits, just as regulatory pressure to promote responsible consumption is starting to strengthen. Those trends could prefigure major changes in some of our markets, generating risks but also presenting us with key business opportunities. Lastly, as our talents become increasingly aware of climate issues, Criteo must do its part to contribute to the global effort in reducing carbon emissions.

By strengthening our CSR approach and diffusing it across all our operations, we aim to improve our understanding of the challenges that climate change will hold for Criteo, and design suitable solutions to manage them.

## iv. Sustainable relationships with stakeholders

### 1. Dialogue with stakeholders

Dedicated departments maintain relationships with internal and external stakeholders through a variety of channels, Criteo's main stakeholders being:

- Employees (see sections i. & ii.)
- Clients, prospective clients, and publishers (see section iv. 2)
- Investors and shareholders (see section iv. 3)
- Technology partners, suppliers and subcontractors, and in particular data-center operations (see section iv. 4)

We engage with other categories of stakeholders through adequate actions and initiatives not detailed in this report, including: public authorities and regulatory bodies, start-up networks, industrial associations and professional networks, journalists and media influencers (including Youtubers and bloggers), research centers and labs, employee representatives and unions, banking partners, financial analysts and influencers, schools and job applicants, and partner non-profit organizations.

In particular, we extended in 2020 our consultation to external stakeholders as part of the update of our materiality analysis presented in introduction to the CSR report.

### 2. Clients and publishers

Criteo's Platform, Marketing and Operations team collaborates closely with Criteo's clients and supply partners to deliver expert consulting, fast and smooth integration, and ongoing campaign management to **ensure the optimal use of Criteo's technologies and the attainment of client's business objectives**. With dedicated Sales and Account Strategy, Creative Services, Analytics, and Technical Services teams, Criteo's clients receive seamless, high-quality support and actionable insight, key factors in Criteo's ability to maintain close to 90% client retention every quarter<sup>15</sup> since 2011.

The Global Marketing team at Criteo is made up of regional field marketing, brand strategy, marketing analytics and insights, content, marketing operations, digital marketing and strategic planning. Together, these functions drive brand awareness, new customer acquisition, growth of existing client and partner business, and customer loyalty through a series of integrated programs that combine digital marketing, sales enablement, events, social media, and thought leadership activities.

Criteo provides **unique inventory and access with unparalleled reach to its clients** through the Supply Publisher and Platform Partnerships teams. These teams work with premium publishers, local SSPs, and global ad exchanges to directly integrate their systems with Criteo via header bidding or real-time bidding technologies. Criteo has spent \$5.6B with publishers over the last 5 years and through our deep relationships and technical integrations, we help publishers in widespread verticals and major markets to distribute content and tools while supporting the free flow of information across the open internet.

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<sup>15</sup> Quarterly retention rate represents the percentage of live clients during the previous quarter that continued to be live clients during the current quarter.

These direct connections allow partners to tap Criteo's constant demand while Criteo's clients receive access to the highest quality inventory across channels and formats to deliver the best possible campaign performance.

In order to continue improving the quality of its services and to create a trustful relationship with clients, Criteo conducts **an annual customer satisfaction survey (CSAT Survey)**. More than 2,000 clients responded this year (vs around 1,900 in 2019), representing approximately 1,300 of our client accounts. The results of the CSAT survey are transmitted in real-time to our employees in charge of client relations, in order to be aware of areas of improvement identified and provide personalized support to their clients.

More information regarding the products and services offered to our clients by Criteo are available in the presentation of the business model, in this CSR report's introduction.

### 3. Investors and shareholders

We are actively engaged with the investment community through a number of channels.

Over the course of 2020, **senior management and the Investor Relations team discussed our strategy and business development with institutional investors and analysts**. We hosted and attended hundreds of meetings with sell-side and buy-side analysts and investors in Paris, London, New York City, and Boston at the beginning of the year and then virtually, due to the Covid-19 pandemic. Members of the Investor Relations team as well as senior management participated in 21 investor conferences, mostly virtually. Investors can access a wide range of information about Criteo and its shares online. We webcast all key investor events at which our CEO or CFO speak, and we post all relevant presentations on the Investor Relations website.

**Shareholders can reach the Investor Relations team directly by sending an e-mail to [investorrelations@criteo.com](mailto:investorrelations@criteo.com).**

### 4. Subcontractors and suppliers

**Criteo aims to work with a network of reliable and responsible suppliers.** To do so, the Procurement team has established several tools and processes over the years which aim to improve supplier selection and better monitor their performance through the definition of purchasing strategies, management of supplier quality, measurement of supplier performance, and supplier risk analysis. All of these processes include Corporate Social Responsibility (CSR) criteria.

In April 2017, Criteo rolled out its **global procurement policy** including a statement related to CSR and the environmental policy of the bidders as a criterion that can be assessed in the scoring process whenever relevant. This statement is as follows:

"Although Criteo's activities do not have a significant effect on the environment, the company will seek, through the selection of its partners, to:

- Comply with relevant regulatory and legislative requirements, standards and codes of practice,
- Take environmental effects into consideration when purchasing goods or services."

When evaluating bidders' responses to tenders or RFP, Criteo applies its own confidential criteria and weighting. The policy evaluation criteria is comprised of, but not limited to the following, which are not listed in any order of priority:

- Compliance with specifications
- Competitive pricing
- Service delivery, capability and responsiveness
- Quality product/service offering
- Overall supplier quality
- Range of services offered
- Proposed method of operation (ordering, delivery, invoicing)
- Availability and relevance of reports
- Availability and quality of references and relevant experience
- Financial stability
- Pricing structure and controls offered
- Ability to interface with existing infrastructure
- Options/Costing in respect of charges and delivery

As already mentioned in the report, Criteo's commitment to HSE (Health, Safety and the Environment) is also made clear in the specific questions asked during the tender process for data center space rentals. In particular, the company expects potential suppliers to provide clear responses on their use of renewable energies, green procurement and certification.

**Twice a year, Criteo also rolls out a satisfaction survey toward suppliers**, to collect feedback and strengthen relations with them by identifying areas of improvement and taking them into account. These surveys are part of a larger Supplier Relationship Management (SRM) Program that Criteo has developed with critical vendors, with the aim of strengthening the partnerships.

The objective is to do a joint assessment of the business relationship on different areas, including operational efficiency, commercial relationship, the ability of the vendor to drive innovation in its products or services and how the supplier enforces CSR initiatives.

## 5. “Criteo Cares” program

**Criteo's very own social responsibility program is called Criteo Cares**, mentioned already in several parts through this report. The program's mission is to leverage the company's unique assets for social and environmental good, while fostering a diverse workplace culture where all employees feel they belong and are cared for. It was created in 2018 to bring together all local initiatives and coordinate all existing CSR actions across the company, and maximize their impact. The Criteo Cares Program has evolved in 2020: it has been simplified, now organized according to causes, instead of regions.

Plus, the CSR program is no longer just employee-led, but now has a second, more high-level branch that enables the company to carry out CSR actions at a strategic level through the coordination work carried out by the Global CSR Manager. In this way, strong commitments can be made and real initiatives can be taken (Tech for Good, Planet Tech Care Manifesto, 50inTech, etc.). Consequently, Criteo has also significantly increased its internal communication around CSR (19 Criteo Cares newsletters in 2020 for example).

**The program rests on three pillars: Inclusion & Diversity, Environment, and Tech for Good.** The program's strategy and related initiatives are progressively being aligned with the pillars, overseen by the Global CSR Manager and the Global head of CSR, and validated by the CEO.

For the first two pillars (I&D and Environment), projects are driven by six ERGs (Employee Resource Groups), also called Communities, and are led by dynamic community leaders. Each community also has its own Leadership Group sponsor at executive level, as well as a

dedicated internal website. The six communities that cover the social and environmental concerns dear to Criteo employees are briefly described below, as well as in related sections through this CSR report:

- **Green Community**

The Green community aims to raise employees' awareness of environmental issues and to support Criteo's transformation towards a more responsible future. The ideas of the community members help the company to evolve, for example by reducing plastic in offices and canteens, moving towards green energy, offering vegetarian meals in company restaurants, reducing paper, raising awareness of the carbon footprint of digital technology, etc.

- **Pride Community**

We stand for an open, inclusive, and safe work environment. Our Pride Community aims to provide visibility and a sense of belonging for LGBTQ+ members and allies. We recognize that race or ethnicity, biological gender, culture, age, ability status, class, faith, and other social characteristics influence our sexual orientation, gender identity, and gender expression. We take an intersectional approach to our work. Fighting one form of discrimination means fighting all forms. We are committed to promoting equity, dignity, and respect. Multiple, intersecting identities and personal stories make up our community. Criteo wants to be part of a positive social change where human rights are always defended. Pride Community encourages an open and inclusive work environment where Criteos can be themselves and feel supported as employees.

- **Women@Criteo Community**

Women@Criteo is an inclusive community that aims to transform and promote gender equality at Criteo. The group's mission is to be a catalyst for the advancement of women in the workplace at Criteo and in our industry and promote equal access to all opportunities across our organization. Through initiatives such as training and coaching, seminars, open discussions, networking and mentorship, Women@Criteo aims to engage, empower and inspire employees. 2020 was a year of tremendous growth and expansion for the Women@Criteo community. We began the year with a few small local initiatives and have evolved into a truly global community. Over the last 6 months we are thrilled to have launched local Women@Criteo chapters across all regions (Americas, EMEA, APAC), with more than 20 active members representing more than 11 office locations.

- **BIPOC Community**

The Black, Indigenous, and People of Color (BIPOC) community at Criteo was inspired by the BIPOC project. We believe in the power of the community as we know that we are stronger together. Above all, we need to show solidarity and we commit to fighting against racial inequalities and racism. BIPOC Community's mission is to create a culture that empowers employees of color by creating safe spaces, providing resources for career development, and offering educational opportunities to the Criteo community. The BIPOC Community runs, like a book club, mentorship programs, and volunteer events, help us all learn and grow together.

- **Critenable Community**

The Critenable Community was created at first by a group of employees from the People team who believe we need to better take care of our employees with disabilities, whatever they are, visible or invisible. It is now an open group, composed of Criteo employees who discuss and take action together to build a more accessible world for people with disabilities, wherever they are (outside or inside Criteo). We believe creating more awareness around disability situations is critical to create a more inclusive world and to become an even more inclusive company. The Critenable Community commits to improving the employees who have

disabilities' experience at Criteo: we want to take action so that these employees are able to demonstrate the full capacity of their creativity, innovation, performance, success.

- **Education Community**

The Education Community is the youngest of our communities, having emerged in 2020. It is built on a legacy, as historically, different actions have been taken and events organized, mostly within the R&D team. We have consolidated the existing partnerships, added new ones (our main partnerships being now Article 1, Simplon and My Future), while being more inclusive and addressing more teams in Criteo in France. Volunteers in the Education Community believe we can fight inequality of opportunities through education. Our goal is to support and help the under-represented segment on employment market : people coming from disadvantaged backgrounds, unemployed, refugees, women. We have different audiences – from high school students to refugees or people reconvertng professionally.

## v. Ethics and Compliance

Criteo has adopted a Code of Business Conduct & Ethics (the “Code”) setting out the policies and procedures that reflect our commitment to maintaining the highest standards of honesty, integrity and ethics when conducting business. In February 2020, Criteo’s Board of directors also adopted a Human Rights Policy.

For additional information on those policies, please see our 2020 proxy statement.

### 1. Data privacy

Criteo takes privacy protection and compliance very seriously. Processes and policies are put in place to protect and process data **in compliance with applicable Privacy and Data Protection Laws**. This includes GDPR (General Data Protection Regulation) that came into effect in May of 2018.

Since our first product offering in 2008, we have delivered the highest levels of security and data privacy across our portfolio of products, technologies and services – in line with the stringent European data privacy standards, that we have chosen to apply to our global operations and business practices.

Emphasizing the continued importance we place on data privacy, **a privacy policy that covers all of Criteo’s products is in place since September 2019, implemented by Criteo’s Data Privacy Officers**. This privacy policy aims to be user-friendly and transparent for users regarding their rights when it comes to data and how to exercise them, for example, about the right to be forgotten. The policy is available on Criteo’s website.

#### a. Privacy by design

Our Product teams develop every feature with privacy in mind; it’s the cornerstone of Privacy by Design, a sophisticated approach that ensures an industry-leading level of safety for marketers and consumers alike.

**Privacy by Design is Criteo’s long-standing practice and commitment to ensuring industry-leading privacy, security and safety for consumers and marketers.** It means that a senior team of privacy specialists is involved at every stage of the product development pipeline. We design products in challenging ourselves to collect as little as possible while also ensuring that our data collection practices do not allow direct identification of one individual. This is our data minimization commitment.

As a result, **Criteo’s personalized ads are not based on the collection of directly identifying information related to a specific user**, but are usually based on the mere placement of a revocable cookie or mobile advertising ID on a user device, after collecting consent when requested by law.

Key elements of the Privacy by Design approach also include:

- As required by the GDPR, since 2013, we have had a designated **Data Privacy Officer** along with a team of privacy experts.

- These experts sit within the Product and R&D department. They perform ongoing Privacy Impact Assessments to monitor potential risks during the product lifecycle and proactively mitigate those risks.
- The Data Privacy team delivers **company-wide privacy training**, enforces **codes of conduct**, and is **integral** to ensuring that we build best-in-class products and services.

We regularly review and document our internal policies, amend existing privacy policies as necessary, and enforce these policies with our partners and vendors.

## **b. Strict security measures**

**As required by GDPR, Criteo already maintains strict security measures when collecting consumer data from our clients.** We utilize modern pseudonymous methods, including MD5 and SHA-256 double-hashing processes, which can be considered best practices under GDPR, and never willingly store any directly identifying personal information about individual consumers. For compliance and optimal performance, we store European consumer data within the European data center that is physically closest to them. Going beyond compliance, we chose to carry out all data processing activities in Europe, where regulations are stricter.

Also in accordance with GDPR requirements, we implemented in 2018 a **Privacy Compliance Management Software** that allows us to track down and record all data incidents and problems in terms of privacy. It is also an obligation for Criteo to notify the Commission nationale de l'informatique et des libertés (CNIL, the French regulatory body in charge of personal data protection) within 72 hours if any incident occurs that could induce major risks for people's personal data. No such incident occurred in 2020.

In the context of the Covid-19 pandemic, Criteo observed an increase of phishing attempts. Specific awareness video communications were sent out by our Internal IT team to address this concern.

## **c. Transparency and control**

Criteo has long recognized the need to **balance relevant advertising experiences with privacy expectations while empowering consumers to control their experiences.** While some consumers may understand this trade-off, we will do more to educate users on this.

We are a proponent of transparency and control, and we lead on industry and self-regulatory programs supporting these objectives. For example, **we are fully committed to the AdChoices icon program** led by EDAA, the FEDMA Code of Conduct, the IAB Transparency and Consent Framework, the IAB CCPA framework, the NAI Code of Conduct, or the Digital Advertising Alliance CCPA opt-out mechanisms.

The **AdChoices program** allows consumers, with a single click, to see exactly where Criteo is using data, and how we protect their privacy. When a consumer chooses to opt-out, we immediately stop tracking and retargeting. We then remove all identifiers from their browsers, making it impossible to target them in the future. Per European data protection regulations, collected consumer-level data is only kept for 13 months.

Also in accordance with GDPR, **Criteo is maintaining a hotline available on the company's website** that can be used by all users, clients or partners if they have questions or have

experienced any in issue in the way their data is managed. Criteo has an obligation to respond to such requests under 30 days.

All the self-regulatory programs Criteo subscribes to are complementary to applicable US, European and domestic laws. Many national-level governments explicitly support these initiatives though they do not provide for or infer legal compliance (including with GDPR or CCPA, the California Consumer Privacy Act), which businesses themselves are responsible for. These existing industry initiatives and self-regulations have succeeded so far in building up consumer trust. We strongly believe in the benefits of self-regulation, which enables us to meet customer privacy expectations in a fast-paced Internet environment.

We believe that this transparent, consumer-centric, and controllable approach to privacy empowers consumers to make better-informed decisions about our use of their data. We also actively encourage our clients and publishers to provide information to consumers about our collection and use of data relating to the ads we deliver and monitor. We believe our industry-leading privacy, security and safety standards for consumers and our commerce and brand clients are key competitive advantages on the market.

#### **d. Industry leadership**

Regarding investment in **Standards and Certifications** Criteo has an extensive number of certifications in place that are reviewed annually by governing and standards bodies, including:

- Network Advertising Initiative Standards (NAI)
- Interactive Advertising Bureau (IAB) Europe
- Digital Advertising Alliance Self-Regulatory Principles for Online Behavioral Advertising
- European Digital Advertising Alliance's Self-Regulatory Principles
- Digital Advertising Alliance of Canada's Self-Regulatory Principles
- TrustArc

#### **e. Data privacy at Criteo**

The same level of protection is offered for employees' personal data as for users' data since it is subject to the same regulations. In particular, the subcontractor in charge of handling Criteo's e-waste wipes out all confidential and personal information from laptops and such when they collect employees' IT material.

Moreover, awareness-raising programs with regard to cyber-security are carried out for Criteo's employees, and in 2020 new training contents were developed. We also organized a "cyber week" in October 2020, aimed at making employees better informed of risks related to cyber-security and the way to prevent them through workshops, challenges, presentations, etc.

## **2. Fight against tax evasion**

Criteo's management is committed to **ensuring that all of their entities meet their tax obligations and comply with the relevant tax laws in each jurisdiction** in line with the Code of Business Conduct and Ethics and OECD guidelines.

As a multinational organization, Criteo does not undertake artificial transactions for the sole purpose of minimizing tax expenses or incorporating entities in tax heavens where there are no commercial activities.

Criteo recognizes that by operating in multiple jurisdictions we are subject to taxation in several jurisdictions around the world with increasingly complex tax laws, the application of which can be uncertain. All risks cannot be avoided, as an overly cautious approach could have a negative impact on shareholder value.

Criteo adopts a proactive approach to identifying, evaluating and monitoring tax risks and managing all identified risks.

For more details regarding tax management, please refer to our most recent Annual Report on Form10-K.

### 3. Anti-corruption

Criteo prohibits corruption of government officials and the payments of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Criteo is committed to **observing the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, Loi Sapin II, French Anti-Fraud Act**, as well as the applicable anti-corruption laws of all of the countries in which we operate.

To control the corruption risk, our employees are required to follow two main policies:

- **Criteo's Code of Business Conduct & Ethics (updated Oct. 2020):** Our Code of Business Conduct & Ethics, which includes a summary of our Global Anti-Corruption Policy, strictly prohibits our employees (or any third party acting on our behalf) from offering or accepting anything of value (including but not limited to gifts, meals/entertainment, money or services), directly or indirectly to a foreign government official, political official or private/commercial third party, for the purpose of influencing official acts, obtaining or retaining business or to secure an improper advantage.
- **Criteo's Global Anti-Corruption Policy (updated April 2018):** provides further details on our anti-corruption policies and procedures, including definitions and examples of situations that present corruption risk, and the responsibilities of employees and managers to comply with the policy and ensure their subordinates do so as well. It also details our anti-corruption due diligence policies and procedures with respect to agents, consultants and other third parties, and summarizes the anti-corruption laws and regulations in the various countries where Criteo conducts business.

**All employees are required to complete an online anti-corruption training**, either embedded into the Criteo Business Conduct & Ethics training or on a stand-alone basis, when they join the Company and from time to time thereafter, during the course of their employment with Criteo. We also have in place **a global Whistleblowing Policy** (see also next section), which provides guidance on the reporting and handling of concerns regarding misconduct or unethical behavior. The Whistleblowing Policy applies to all Criteo employees, as well as Criteo's directors, temporary workers, consultants and interns in the context of their professional duties.

Criteo regularly **assesses our corruption risks and our controls** in order to ensure ethical conduct by all Criteo employees and to raise overall awareness. These efforts include a periodic compliance risk mapping during which we review our corruption risks, and identify controls to address any gaps that are noted during the assessment.

## 4. Alert mechanisms

Every Criteo employee has a right and responsibility to **report potential violations or questions regarding Criteo's Code of Business Conduct and Ethics** and **obtain guidance** when they are uncertain about what action they should take.

When appropriate, Criteo encourages employees to talk with their direct managers first, as they will often be able to resolve issues quickly. Alternatively, they can also raise these issues to their Human Resources representative, a member of senior management, the General Counsel or the Compliance Officer. If for any reason, an employee does not want to raise his/her concerns through one of these channels, he/she may utilize the Criteo Whistleblowing Hotline, a confidential, 24/7 service managed by a third-party service provider, or send a confidential email to a defined email address or choose to submit a secure Whistleblowing form. The report will be sent directly to the Chairman of the Board's Audit Committee, an independent director of the company who is neither an employee nor a manager. All reports are kept confidential as permitted under applicable law.

Although Criteo employees may choose to remain anonymous when using any of these channels, Criteo strongly discourages anonymous reporting and prefers for employees to identify themselves in order to be able to assure proper follow-up and feedback to them. Criteo strictly prohibits any kind of retaliation against any employee who raises a good faith concern about a potential violation of the Code or participates, in good faith, in an investigation of a potential violation of the Code.

Lastly, a **"Case Management Tool" named i-Sight was set up since 2019** to support the process of conducting formal investigations and/or handle formal people-related processes in case a situation is reported. This tool was put in place to improve Criteo's ability to conduct investigations objectively and fairly and to archive accurate records for future reference if required. Those records are handled in line with local legislation.

## Methodological note

Criteo's CSR report follows dispositions of the transposition of the European directive 2014/95/UE of October 22, 2014 with regards to the disclosure of social and environmental information (July 19, 2017) in France, and of article R. 225-102-1 of the French Commercial Code. This report thus consists in the Non-Financial Performance Statement to be established by Criteo in accordance with those dispositions (in French "Déclaration de Performance Extra-Financière", or "DPEF").

### Reporting period and scope

All information collected and highlighted in the CSR report covers the period from January 1, 2020 to December 31, 2020.

We aim to match the CSR reporting scope with our financial reporting scope. So far, due to the large number of offices and the problem likely to arise regarding exhaustive and reliable data collection of electricity consumption in some of the smaller offices, Criteo has made the decision to include only the largest offices during the collection of quantitative data.

Therefore, to ensure reliable quantitative data and boost continuous improvement, the Criteo CSR reporting scope for 2020 considers the major global legal entities with more than 50 employees at the end of 2020. For electricity consumption, only offices with more than 50 employees are taken into account, due to the information being complex to obtain for smaller offices.

Vigilance point: Legal entities that joined Criteo's financial scope in year N should be included in the CSR reporting scope in year N+1.

Thus, for the financial year 2020, the reporting scope on quantitative data covers the following legal entities and offices, which represent 90% of the overall Criteo's workforce for social information and environmental information:

EMEA		AMERICAS		APAC	
Legal entity	Offices	Legal entity	Offices	Legal entity	Offices
<b>Criteo S.A.</b>	<b>Paris</b> Grenoble	<b>Criteo do Brazil LTDA</b>	<b>São Paulo</b>	<b>Criteo KK</b>	<b>Tokyo</b> Osaka
<b>Criteo Europa SL</b>	<b>Barcelona</b>	<b>Criteo Corp.</b>	<b>Ann Arbor</b> <b>Boston</b> Chicago Los Angeles Miami <b>New York</b> <b>Palo Alto</b> San Francisco	<b>Criteo Singapore Pte. Ltd.</b>	<b>Singapore</b>
<b>Criteo Ltd</b>	<b>London</b>				
<b>Criteo GmbH</b>	<b>Munich</b>				
<b>Criteo France SAS</b>	<b>Paris</b>				

Legend: In bold, offices with more than 50 employees that collect actual data for electricity consumption. For other offices, electricity consumption and CO<sub>2</sub> emissions due to electricity consumption are estimated based on a yearly ratio per person. Those offices account for 6% of office electricity consumption and 6% of emissions due to office electricity consumption.

## Relevance of CSR indicators

Criteo's choice of a panel of CSR indicators is based on:

- A benchmark on CSR best practice among IT sector leaders
- Workforce-related, environmental and social impacts and risks analysis of Criteo's activity
- Global Reporting Initiative (GRI) G4 guidelines
- Specific indicators to Criteo's Human Resources policy

Every year the list of CSR indicators is reviewed and updated based on feedback from Criteo's CSR team, reporting contributors and proof-readers, taking into account new focus areas in the report and expectations from stakeholders.

## Internal and external controls

Data collected during the CSR reporting process is controlled by "validation managers". For each KPI, a dedicated person is in charge of data control and performs consistency tests listed within Criteo's reporting procedure.

For instance, to avoid discrepancies during the KPI reporting process, each validation manager performs the following controls:

- Lack of data: Verification of the presence of the overall data. Lack of data must be justified by the person in charge of the KPI.
- Data consistency: Verification of data consistency compared to last year's data. Significant annual variations must be justified and documented.

Since 2016, to ensure accurate and reliable information, Criteo has also mandated an independent third-party body to verify and validate the reliability of Criteo CSR information. A thorough control process is important. Data, together with methods of calculation and consolidation, must be externally verifiable. The nature of verification work conducted and external conclusions are available on demand.

## CSR indicators – Calculation and estimation methods

### • Headcount:

The headcount figures include all Criteo employees on the last day of the year:

- Permanent employees (whose work for Criteo is not limited to a fixed-term)
- Non-permanent employees (fixed-term contracts, work-study contracts)
- Employees who are momentarily on leave of absence and are therefore inactive (parental leave, sabbatical leave, long illness, etc.)
- Employees of a legal entity seconded to another legal entity and expatriates
- Employees leaving the company on the last day of the year

- **Training:**

Training hours of employees who left the company during the reporting period are included in the calculation of training hours. Training hours of sub-contractors or consultants who have been trained by Criteo are not included in the calculation of training hours.

#### *Face-to-face training hours*

Are considered:

- The number of training hours that employees attended (not the number of training hours that employees registered for) and which were reported by Human Resources business partners to the Global Learning & Management Development team
- Individual coaching or state of the art co-development sessions
- Management and leadership development modalities

Are excluded:

- Seminars, conferences, working groups, open days
- On-boarding training sessions and resources (FlyCriteo program)

Where face-to-face training hours are related to sessions running over two consecutive years, if the session represents more than 50 hours, the hours are accounted pro-rata temporis, otherwise, hours are included within year N figures.

#### *E-learning training hours*

Due to the large choice of e-learning platforms offered to Criteo employees (Coursera, LinkedIn Learning, Rosetta Stone, etc.), the decision was made to adapt our tracking and reporting method for e-learning hours to each platform's specific approach to learning, course organization, and recording system for hours spent by users on the platform.

While this approach means that the calculation method is not the same for each platform, it aims to ensure that the most relevant method has been used in each case in order to report the actual training hours followed by employees. The most frequently used methods are for instance:

- The reporting of training contents completed up to a certain point (with minimal and sometimes maximal duration thresholds set up depending on the type of course provided), for instance:
  - o Micro-learning: recorded from one minute on (LinkedIn Learning; The Learning Zone). As the micro-learning platforms are composed of short contents focusing on the essential, a limit of one-min has been set up.
  - o MOOC learning: recorded from one hour to max 25 hours (Coursera). As the MOOC courses should take between 19 & 25 hours, a limit of 25 hours for this type of e-learning has been set to make sure that this range includes mostly learning hours contents. Above 25 hours will include most of the time quizzes, exams or discussion forums.
- The reporting of only theoretical hours, not the actual "on-line connection time", for instance for E-learning training from Product department
- Languages trainings are not submitted to a minimum duration as we considered that languages learning should be valued from the start, especially in 2020 in the context of the Covid-19 pandemic.

Are excluded:

- Time logged in the LMS
- Training content below the minimal duration or above the maximum duration

- Training content started during the previous financial year
  - Training content only related to an assessment or quiz
  - Training content only based on "document reading" or "link to document"
  - Training content related to basic IT application tutorials for all employees such as expenses reports, Human Resources Information System
  - Programs and content pushed/prescribed to all employees for compliance purposes or for IT application up skill
- **Business trips:** Data from the business travel agency, EGENCIA, includes all Air Travel Scope as well as Train trips since 2020.
  - **Electricity consumption of offices:** Where the value for one or several months is missing, an extrapolation is made based on the months available.
  - **Electricity consumption of data centers:** actual data is supplied by Criteo's data room providers. Electricity consumption includes all data centers except POPS for which power need is negligible.
  - **Amount of renewable energy consumed for data centers:** The rate used is the Renewable Energy rate claimed by the owner of the data center.
  - **Amount of renewable energy consumed for offices:** the national renewable energy rates used are from the International Energy Agency (IAE).
  - **CO<sub>2</sub> emissions from electricity consumption of offices:** Emission coefficients per country from ADEME 2020 database have been used for the calculation.
  - **CO<sub>2</sub> emissions from electricity consumption of data centers:** For data center with a 100% rate of renewable energy (including using compensation certificates), the emission coefficient is considered equal to 0. For the other data centers, emission coefficients per country from ADEME 2020 database have been used for the calculation, except for Hong Kong where a rate of 0.51 \*10<sup>-3</sup> teqCO<sub>2</sub> has been used from CLP database (local electricity supplier).

## Other information

Given the nature of its activity and business, Criteo does not produce any matter that may severely and directly affect the environment or violate Human Rights.

Consequently, this report does not contain disclosures on the following information mentioned under article R. 225-102-1 of the French Commercial Code:

- "Human rights"
- "Food waste"
- "Food insecurity"
- "Animal wellbeing"
- "Responsible food choices"

Those topics were assessed as part of the materiality analysis presented in introduction to this report, and confirmed as lesser priorities.