



Global Human Rights Policy

Criteo SA is fundamentally committed to respecting all human rights. Our goal is to ensure that our products and services are provided in a way that respects, encourages and supports human rights.

While governments have the primary responsibility for protecting and upholding the human rights of their citizens, Criteo recognizes our responsibility to respect internationally recognized standards of fair treatment and non-discrimination in our operations. Standards that we look to and are guided by include the **United Nations Guiding Principles on Business and Human Rights** and the **UN Universal Declaration of Human Rights**. Further, we are committed to respecting all internationally recognized human rights wherever we do business.

We are committed to investing in our employees and the communities in which we operate. This policy outlines our company-wide approach to human rights. The policy applies to Criteo SA and its subsidiaries, and applies to everyone in the company including the Board of Directors and all colleagues when doing work for Criteo. Additionally, we strive to select and work with vendors, partners and suppliers who respect all relevant human rights conventions and principles.

Company Workplace

We strive to promote respectful, safe and inclusive work environments wherever we do business.

Safe and healthy workplaces: We provide a clean, safe, and healthy work environment. The health, wellness, and safety of our workers is a top priority. Everyone has the right to a safe and healthy workplace with proper reporting rules and practices in place.

Diversity and Inclusion: We are committed to diversity and inclusion throughout our business. We are dedicated to equal opportunity and do not tolerate discrimination or harassment. We seek individuals from all backgrounds to join our teams, and look to empower individuals who may face discrimination or disadvantage.

Equal opportunity: We seek to ensure that all of our workers are treated equally, and we do not tolerate discrimination based on race, gender identity, gender, sexual orientation, color, national origin, religion, age, disability, political opinion, pregnancy, migrant status, ethnicity, marital or family status, or similar personal characteristics in hiring or working practices. We aim to ensure employment decisions and actions are based solely on business-related considerations and not on personal characteristics. As outlined in our Code of Business Conduct and Ethics, we strictly forbid any kind of discrimination, harassment, mistreatment or bullying.

Freely chosen employment: We do not tolerate the use of forced labor, child labor or human trafficking in any form throughout our operations.

Guidance and Reporting

Integration: We expect and encourage everyone in our business to embed these principles into their everyday work and provide employee training to raise awareness on them. We strive to understand the impact of each part of our business on human rights, to address and mitigate any negative impacts, and to invest in the people behind the products and services we provide.

Continuous improvement: To ensure we are continuing to uphold the highest standards, we continuously review our policies and practices to ensure alignment with these principles and periodically provide updates on progress to senior management.

Reporting Conflicts: Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place in which he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management, the Criteo People team or the Legal Department. Employees can also report suspected policy violations through our Whistleblower Hotline at speakup@criteo.com or +1 866 865 9476, or via secure online form at <https://www.openboard.info/CRTO/index.cfm>, or contact the Compliance Officer at ethics@criteo.com. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. Criteo will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation. This policy, including translations, can be found via Criteo's intranet, or on the investor relations portion of our website.

Questions: If you have any questions in relation to this Policy or any other Compliance Policy, please contact the Compliance Officer at ethics@criteo.com.