



CRITEO GLOBAL DISABILITY POLICY

Public Policy

PURPOSE

Criteo is committed to ensuring equal access and participation for people with all types of disabilities (either physical or mental, and visible or hidden). We are committed to treating people with disabilities in a way that allows them to maintain dignity, respect, and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We do so by removing and preventing barriers to increase accessibility and by meeting our reasonable accommodation requirements under each respective and relevant country legislation where we have employees employed.

This policy demonstrates our commitment to fostering and supporting a diverse workforce, and to integrating equality opportunities for people with disabilities into Criteo policies, procedures, decisions, and operations. Criteo is committed to supporting a culture that values the promotion of a positive and safe environment for all its employees and an environment that reflects our company values of open, together, and impactful, aligned with the principles of understanding acceptance and inclusion.

APPLICABILITY

This policy covers all employees and job applicants. It also covers any employee who becomes disabled during their employment at Criteo. Where relevant it covers anyone employed by outside agencies working on Criteo premises.

POLICY STATEMENT

This policy covers all areas of employment, including recruitment, onboarding, promotion, and training.

All necessary changes will be investigated, and any reasonable* changes will be made to the workplace and to employment arrangements so that people with disabilities are not at any substantial disadvantage compared to non-disabled people.

In recruitment and selection, Criteo will continue to modify selection techniques, where appropriate, and make any others reasonable changes to ensure that people with disabilities can be considered equally with non-disabled candidates.

Criteo will continue to ensure that people with disabilities will receive equal treatment in training and development, and, where appropriate, will supply additional training.

A flexible approach will be adopted and, where possible and reasonable, consideration will be given to reallocation of duties, time off for rehabilitation, assessment or treatment or other

appropriate measures to ensure equal opportunities, provided that such accommodation does not constitute an undue hardship on Criteo.

Every endeavor will be made to ensure that contract workers are not discriminated against because of their disability and will ensure that any contract workers and other agencies that may be used are aware of this policy.

* Defining what is reasonable: The test of what is reasonable is ultimately an objective test. For example, when deciding whether an adjustment or accommodation is reasonable considerations may include:

- how effective the change will be in avoiding any barriers or disadvantages an employee with a disability would otherwise experience
- the practicality of the request
- the total cost outlay to make the adjustment or accommodation
- resources required to implement changes
- the availability of financial support.

POLICY GUIDELINES

Employees will be provided with access to reasonable services and support to enable them to fulfil the responsibilities of their employment. Where applicable, employees may use specialized equipment as provided for their workplace and may also bring and use their own specialized equipment with the appropriate country specific approvals.

In addition, Criteo is committed to complying with the directions outlined below:

- Criteo is committed to supporting all employees and recognizes that employees with disabilities or those who may be developing a disability may require additional support to enable them to remain in the workplace.
- Criteo will also consider making reasonable adjustments for employees that may not be deemed as having a disability as defined by the law.
- Criteo commits to not only abide by the essential actions, but wherever operationally and reasonably possible, to go beyond any statutory legal requirement to support employees who develop a disability to help them remain employed.
- This policy is designed to support employees with existing disabilities, employees who may be developing a disability, as well as the recruitment of employees with disabilities.
- This policy should also encourage all employees to work within the principles and spirit of this policy, regardless of whether they are disabled.
- This policy is based on best practice and recognizes the need to protect against discrimination due to disability as defined by the law as well as the UN Convention on the Rights of persons with Disabilities, Article 27.

ASSISTIVE DEVICES

- People with disabilities may generally choose to use their own personal assistive devices, while performing their work duties. Criteo acknowledges the importance of these devices and will generally allow people with disabilities to use their own personal assistive devices to perform their work, unless Criteo determines there is a defined risk associated with that use.
- In cases where the assistive device presents a safety concern or where accessibility might be an issue, Criteo will assess the alternative and reasonable options which may be available to meet the needs of the individual.

ERGONOMICS

A goal of this policy is to ensure that we address the ergonomics requirements of individuals as required for the job and responsibilities to promote health and safe work practices by:

- Ensuring that ergonomic hazards relating to poor design of tools, equipment, workstation, or work practices are identified and recorded.
- Establish and implement controls to eliminate or reduce ergonomic or workplace risks.
- Ensure that all employees have been provided with adequate equipment for tasks undertaken.
- Ensure that employees have been provided with relevant information, instruction, and training in the use of equipment, workstation set up, and work practices

Poor work design can present ergonomic risk factors called stressors. These may include:

- Repetition – the number of motion or movements performed
- Force – the power of the muscles used to produce motion to perform necessary work activities such as lifting, pushing, etc
- Extreme posture – where muscles are required to work at a level near or at their maximum capacity.

Ergonomic risk factors for Criteo employees may include:

- The characteristics of the working environment or workstation that may contribute to musculoskeletal disorder
- Characteristics of the workplace, tasks or individual work practices that may cause or aggravate any condition that may cause injury or impact an employee's ability to do their normal duties comfortably.

NO RETALIATION

Criteo expressly prohibits any form of discipline, reprisal, intimidation, or retaliation against any individual for requesting an accommodation in good faith.

ADMINISTRATION AND LEGAL COMPLIANCE

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedure. This policy will be interpreted and applied in accordance with all applicable laws, and to the extent this policy conflicts with or is inconsistent with applicable law in any respect, applicable law will control over this policy.