



Non-Financial Performance Statement 2023

FEBRUARY 2024

Criteo's Corporate Social Responsibility Report

Message from...

the CEO and Chairwoman of the Board

At Criteo, we have a clear mission: to power the world’s marketers and media owners with trusted and impactful advertising and to do that in a way that positively contributes to the world around us. We’re racing towards our goals by focusing on a core set of key priorities and this Corporate Social Responsibility (“CSR”) report shows two of those priorities in action: to reduce our environmental footprint and to champion Diversity, Equity, and Inclusion (“DEI”) across our industry.

In 2023, we made great strides in our CSR initiatives. We formed a sustainability committee to strengthen our company-wide approach to CSR and align our business activities with our values. We also revised our Procurement Policy to engage our network and encourage our vendors to work with us toward a more sustainable future. These efforts have been recognized with the EcoVadis Silver Medal. We are incredibly proud to have this recognition reassert our firm CSR commitments to our clients and stakeholders.

We’re also excited to further enhance our environmental disclosures with the completion of our first Climate Disclosure Project (CDP) questionnaire, which analyzes how our climate strategy measures up to industry standards.

In addition, we conducted our annual Greenhouse Gas (“GHG”) assessment (Scopes 1, 2 and 3) to determine more opportunities for improvement. We submitted our GHG emissions reduction targets to the Science Based Target Initiative (SBTi), which validated them, reflecting our commitment to curbing the carbon footprint of our products and corporate activities in line with the Paris Agreement goals.

Our people are what make Criteo distinctive. From the very beginning, it has been part of our DNA to create an inclusive environment where our employees can thrive. We do this by listening to our employees, running a regular listening program where – twice a year through surveys – we collect and respond to their feedback, focusing on boosting engagement, and supporting their well-being. We also launched our first global mentoring program which is all about sharing knowledge, experience, and skills to empower our people on their path to success.

Further, we worked to continuously improve our understanding of DEI challenges and the needs of our different communities. Thanks to the feedback from our BIPOC¹ Community, we created the Empower U program which is dedicated to empowering high performers from underrepresented communities. In 2023, we also continued to progress towards attracting and retaining Women in Tech roles throughout the company and have already seen the early positive impact of this program across Criteo.

We’re proud of the milestones that we’ve achieved thus far through our unwavering commitment and incredible teamwork. This enabled us to make steady progress on our journey, from defining ambitious CSR goals to making a positive impact through our Criteo Cares program. During our two global volunteer weeks, we saw more than 400 employees across the globe take part in missions to support the local causes they care about.

As we reflect on our achievements, we recognize the journey ahead is one of continuous improvement. Our commitment to CSR values is unwavering and we are steadfast in our pursuit of setting new benchmarks for responsible business practices and creating positive global change.



Megan Clarcken
Chief Executive Officer, Criteo



Rachel Picard
Chairwoman of the Board, Criteo

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Introduction

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Disclaimer

This Report covers our business and does not address the performance or operations of our suppliers, our contractors, or our partners, unless otherwise noted. The goals and projects described in this Report are aspirational; as such, no guarantees or promises are made that these goals and projects will be met or successfully executed.

Furthermore, data, statistics and metrics included in this Report are controlled by an independent third-party, including a review of the key indicators. They continue to evolve and may be based on assumptions believed to be reasonable at the time of preparation but should not be considered guarantees or subject to future revision.

This Report uses certain terms including “material” and “materiality” to reflect the issues or priorities of Criteo and its stakeholders. Used in this context, however, these terms are distinct from, and should not be confused with, the terms “material” and “materiality” as defined by or construed in accordance with U.S securities laws or as used in the context of financial statements and reporting.

This Report, which speaks only as of its date, is not comprehensive, and for that reason, this Report should be read in conjunction with our most recent Annual Report on Form 10-K and subsequent quarterly reports on Form 10-Q filed with the U.S. Securities and Exchange Commission (SEC), particularly the “Special Note Regarding Forward-Looking Statements” and “Risk Factors” sections, and our most recent Proxy Statement, all of which [can be found here](#).



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Statements of future events or conditions in this Report, including those that concern future circumstances and results and other statements that are not historical facts and are sometimes identified by the words “anticipate,” “believe,” “can,” “could,” “estimate,” “expect,” “intend,” “is designed to,” “may,” “might,” “objective,” “plan,” “potential,” “predict,” “project,” “seek,” “should,” “target,” “will,” “would,” or the negative of these and similar expressions, are forward-looking statements. Forward-looking statements are based upon current plans, estimates and expectations that are subject to risks, uncertainties, and assumptions. Should one or more of these risks or uncertainties materialize, or should underlying assumptions prove incorrect, actual results may vary materially from those indicated or anticipated by such forward-looking statements. The inclusion of such statements should not be regarded as a representation that such plans, estimates or expectations will be achieved. Important factors that could cause actual results to differ materially from such plans, estimates or expectations include, among others: volatile interest rates, including its macroeconomic effects, on our business, operations, cash flow and financial results; the ability of the Criteo Artificial Intelligence (AI) Engine to accurately predict engagement by a user; our ability to predict and adapt to changes in widely adopted industry platforms and other new technologies, including without limitation the proposed changes to and enhancements of the Chrome browser announced by Google; our ability to continue to collect and utilize data about user behavior and interaction with advertisers and publishers; our ability to acquire an adequate supply of advertising inventory from publishers on terms that are favorable to us; our ability to meet the challenges of a growing and international company in a rapidly developing and changing industry, including our ability to forecast accurately; our ability to maintain an adequate rate of revenue growth and sustain profitability; our ability to manage our international operations and expansion and the integration of our acquisitions; the effects of increased competition in our market; our ability to adapt to regulatory, legislative or self-regulatory developments regarding internet privacy matters; our ability to protect users’ information and adequately address privacy concerns; our ability to enhance our brand; our ability to enter new marketing channels and new geographies; our ability to effectively scale our technology platform; our ability to attract and retain qualified employees and key personnel; our ability to maintain, protect and enhance our brand and intellectual property; failures in our systems or infrastructure; and the risk factors in the “Risk Factors” section of our most recent Annual Report on Form 10-K and those set forth from time-to-time in other filings by the company with the SEC, available through our website or through the SEC’s Electronic Data Gathering and Analysis Retrieval (EDGAR) system [here](#).

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Pursuant to Article L. 225-102-1 of the French Commercial Code, our Statutory Auditor Deloitte's review at consolidated level of the CSR Report ("declaration de performance extra-financière") attached to the management report ("rapport de gestion") is threefold:

1 Understanding the context:

- Understanding the business activity of the group, the report on the main social and environmental risks relating to those activities, together with the subsequent policies and their results.
- Assessing the suitability of the procedures used to prepare the CSR Report to ensure relevance, completeness, reliability, neutrality and clarity of the information provided therein.

2 Statement compliance review:

- Making sure that all information concerning social and environmental issues that needs to be included is effectively included,
- Verifying that are included the business model and the main risks relating to the activities of the group and assessing the process of selecting and validating the risks.

3 Review of the fair representation of certain non-financial information:

- Assessing the collection process of information ensures fair presentation of policy results, including key performance indicators.
- For key indicators as well as selected qualitative information that our third-party auditor deems significant, (i) verifying proper consolidation of collected data and consistency of trends, and (ii) carrying out substantive tests, on a sampling basis, designed at verifying proper application of definitions and procedures, and reconciling data with supporting documents.
- Consulting documentary sources and conducting interviews to corroborate the qualitative information that it deems most significant.

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Process for Elaborating the CSR Report

Corporate Social Responsibility (CSR) has always been a part of who we are, long before Criteo issued the first installments of this annual CSR Report (the “CSR Report” or “Report”). We are proud of our culture that empowers our people to “do better”, and as Criteo advances toward increasingly ambitious commitments, CSR remains everyone’s responsibility. It is our employees’ strong engagement that makes it possible for us to achieve our goals in terms of Diversity, Equity, and Inclusion, Ethics, and the Environment. Those goals will shape our future growth and define the value we want to create for society, and we are excited to disclose them in this Report.

Beyond describing Criteo’s CSR strategy, the Report highlights the progress we achieved in 2023. It was prepared in accordance with the provisions of Article L.225-102-1 of the French Commercial Code. This Report is also aligned with other non-financial reporting standards such as the Sustainability Accounting Standards Board (SASB)². The structure of this Report for 2023 is designed to anticipate the future disclosure requirements of the Corporate Sustainability Reporting Directive (CSRD)³, which will apply to Criteo from the fiscal year ending on December 31, 2025. Therefore, it considers the European Sustainability Reporting Standards (ESRS), while not fully compliant therewith yet.

We are also working to align our climate-related disclosures with the recommendations defined by the Task Force on Climate-Related Financial Disclosures (TCFD).

This Report is established following a standardized annual process that consists first of identifying the topics to address based on a materiality analysis⁴. We subsequently conduct interviews with internal stakeholders who provide a detailed picture of the year’s progress and achievements. The final steps include the consolidation of full-year data and production of the Report, which is then reviewed by internal teams, including Global Communications, Legal and Compliance, Finance, Investor Relations, and various stakeholders involved in sustainability topics across the organization. The Report is finally submitted to an external audit by an independent third party.

In this Report, Criteo S.A. is referred to as the parent company and together with its subsidiaries, collectively, as “Criteo,” the “Company,” the “Group,” or “we”.

More information regarding the process for establishing the Report is available in the “Methodological Note” at this end of this document.

² See concordance table with SASB standards in the CSR Approach. ³ Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU, as regards corporate sustainability reporting. ⁴ A materiality analysis is a process that enables a business to identify their most important areas to focus on so that they can be highlighted as a priority, as well as to understand which are of most concern to stakeholders and how they impact the business model (and vice versa).

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The structure of this Report for 2023 is designed to anticipate the future disclosure requirements of the Corporate Sustainability Reporting Directive (CSRD), which will apply to Criteo from the fiscal year ending on December 31, 2025. Therefore, it considers the European Sustainability Reporting Standards (ESRS), while not fully compliant therewith yet.

SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
General Information	ESRS 2 - General Disclosures	General disclosures, including information provided under the Application Requirements of topical ESRS listed in ESRS 2 Appendix C	Message from the CEO and Chairwoman of the Board I. Introduction 1. About This Report 2. CSRD Concordance Table 3. Business Model 4. Corporate Governance 5. Culture and Values II. Approach to Corporate Social Responsibility (CSR) 1. Main CSR Challenges and Materiality Analysis 2. CSR Approach and Governance 3. Relationships with Stakeholders 4. Key Results and Objectives 5. Contribution to Sustainable Development Goals a. UNSDGs Concordance Table 6. SASB Concordance Table 7. TCFD Concordance Table 8. Awards and Recognitions
Environmental Information	Not applicable	Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)	N/A
	ESRS E1 - Climate Change	Climate change adaptation - Climate change mitigation - Energy	III. Reduce Criteo's Environmental Impact 1. Criteo's Environmental Approach in Addressing Climate Change a. Criteo's Carbon Footprint b. Climate Reporting Frameworks 2. Environmental Impact of Data Centers and Hardware a. Relocation and Rightsizing b. Working with our Vendors c. Energy Consumption and Greenhouse Gas Emissions due to Data Centers

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SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
Environmental Information	ESRS E1 - Climate Change	Climate change adaptation - Climate change mitigation - Energy	3. Environmental Impact of Offices and Travel a. Green Offices b. Energy Consumption and Greenhouse Gas Emissions due to Offices and Travel c. Environmental Impact of Subcontractors and Suppliers d. Employee's Green Initiatives
	ESRS E2 - Pollution		In Progress
	ESRS E3 - Water and Marine Resources	Resources inflows, including resource use - Resource outflows related to products and services - Waste	e. Natural Resources Consumption and Waste Management
	ESRS E4 - Biodiversity and Ecosystems		In progress
	ESRS E5 - Resource use and Circular Economy	Resources inflows, including resource use - Resource outflows related to products and services - Waste	e. Natural Resources Consumption and Waste Management
Social Information	ESRS S1 - Own Workforce	Working Conditions	IV. Supporting People Development and Talent Initiatives 1. Headcount 2. Recruitment and Terminations 3. Compensation and Benefits 4. Safety and Well-being at Work
		Equal Treatment and Opportunities for all	5. Skills Management and Development a. Instructor-led Training 2023 Highlights b. Online Training 2023 Highlights c. Criteo's Coaching Offer d. Hackathon 6. Presentation of the Criteo Cares Program V. Employee Relations, Inclusion, and Diversity at Work 1. Employee Relations 2. Criteo's Strategy for Diversity, Equity, and Inclusion (DEI) 3. Gender Equality, LGBTQIA+ Community and Parenthood a. Gender Equality at Criteo

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SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
Social Information	ESRS S1 - Own Workforce	Equal Treatment and Opportunities for all	b. Inclusion of the LGBTQIA+ Community
			c. Parenthood Support at Criteo
	ESRS S2- Workers in the Value Chain	Working conditions - Equal treatment and opportunities for all - Other work-related rights	4. Social Diversity
			5. People with Disabilities, BIPOC Community, Non-discrimination and Prevention of Harassment
ESRS S3 - Affected Communities	Information-related impacts for consumers and/or end-users - Personal safety of consumers and/or end-users - Social inclusion of consumers and/or end-users	a. People with Disabilities	
		b. Inclusion for the BIPOC Community	
ESRS S4 - Consumer and End-users	Information-related impacts for consumers and/or end-users - Personal safety of consumers and/or end-users - Social inclusion of consumers and/or end-users	c. Non-discrimination and Prevention of Harassment	
		VII.1. Code of Business Conduct & Ethics	
Governance Information	ESRS G1 - Business Conduct	Corporate culture, Protection of whistle-blowers - Political engagement - Management of relationships with suppliers - Corruption and bribery	In Progress
			VI. Sustainable Relationships with Clients and End-Users
Appendix	Appendix	Appendix	1. Dialogue with Clients
			2. Ethics in our Ads
Appendix	Appendix	Appendix	3. Data Privacy and Information Security
			a. Privacy by Design
Appendix	Appendix	Appendix	b. Strict Security Measures
			c. Transparency and Control
Appendix	Appendix	Appendix	d. Industry Leadership
			e. Data Privacy at Criteo
Appendix	Appendix	Appendix	VII. Governance
			1. Code of Business Conduct & Ethics
Appendix	Appendix	Appendix	2. Global Tax Compliance
			3. Anti-corruption
Appendix	Appendix	Appendix	4. Whistleblowing and Alert Mechanisms
			Methodological Note

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Our Business Model

- **Founded in 2005**
- **Criteo S.A.**
- **French technology company**
- **Headquartered in Paris**
- **NASDAQ-listed**
- **Strong presence worldwide**
- **Western Europe, North America, and the Asia-Pacific Region**

Criteo is a global technology company that enables marketers and media owners to drive better commerce outcomes through our world-leading Commerce Media Platform. We are a leader in commerce media, the future of digital advertising, leveraging commerce data and artificial intelligence to connect ecommerce, digital marketing and media monetization, and to best engage consumers throughout their shopping journey.

Our vision is to bring richer experiences to every consumer by supporting a fair and open internet that enables discovery, innovation, and choice - powered by trusted and impactful advertising.

Since 2018, and accelerating since 2020, we have deeply transformed our offering to a multi-solution platform, diversifying our business to address a broader range of marketing and monetization goals including commerce audience targeting and Retail Media. We enable brands', retailers', and media owners' growth by providing best-in-class marketing and monetization services on the open internet, driving approximately \$30 billion in commerce outcomes for our clients in the form of product sales and leads for marketers and advertising revenues for media owners. In 2023, we operated in 109 countries.



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The Criteo Commerce Media Platform

We have made significant progress in our journey to meet the needs of brands, marketers, retailers, and media owners in an evolving commerce landscape. With our unique Commerce Media Platform, we offer marketing and media owner clients a single platform for first-party data-based marketing and monetization that provides a holistic suite of solutions, powered by Artificial Intelligence (AI) technology and the world's largest set of commerce data on the open internet.

Recent Acquisitions

IPONWEB

August 2022

IPONWEB - a market-leading Ad Tech company with world-class media trading capabilities.

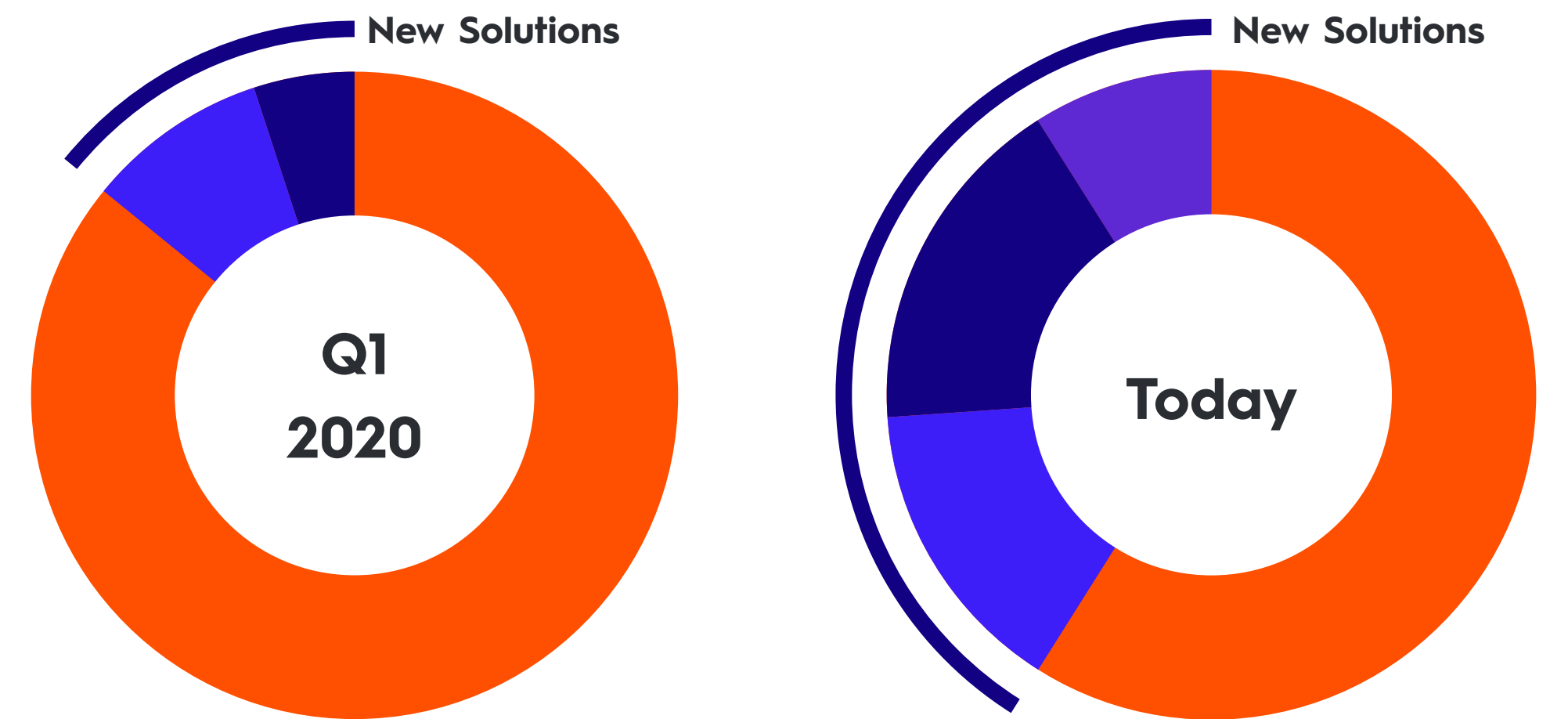
brandcrush!

August 2022

Brandcrush - an end-to-end platform for shopper marketing, retail media and b2b partnerships.

We are delivering on our transformation strategy

CONTRIBUTION EX-TAC MIX



● Retargeting ● Commerce Audiences ● Retail Media ● Iponweb

 **First Party Media Network**

 **Other environments with third-party signals**

 **Opt-in signals**

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The Criteo Commerce Media Platform is comprised of four client solutions.

DEMAND-MEDIA ACTIVATION

CRITEO // COMMERCE MAX

Commerce Max is a Commerce self-service Demand Side Platform (DSP) for brands and agencies, enabling media planning and buying on retailer and open internet inventories, all with closed-loop product-level conversion measurement.

CRITEO // COMMERCE GROWTH

Commerce Growth is a powerful, self-service performance marketing tool used by Direct-to-Consumer brands and their agencies to acquire and retain customers.



SUPPLY-MEDIA MONETIZATION

CRITEO // COMMERCE YIELD

Commerce Yield is a suite of monetization solutions giving retailers and marketplaces full control to achieve maximum monetization of their digital assets through inventory and data management, packaging, and in-depth insights.

CRITEO // COMMERCE GRID

Commerce Grid is a Commerce Supply Side Platform for media owners and access from agencies through the Demand Side Platform (DSP) of their choice.

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Key inputs and assets for Criteo

Financial Results

\$1,949 million

revenue for the year ended December 31, 2023

\$302 million

adjusted EBITDA

\$1,023 million

contribution ex-TAC

\$55 million

net income

\$863 million

gross profit

Infrastructure

39,000

servers in 14 data centers
incl. eleven processing data
centers and three network POPs

1.5

petabyte of
random-access memory

100%

of the CO2 emissions linked to data
centers use are offset

Clients

18,000

clients served

90%

client retention rate (approx.)

47%

direct client relationships

53%

advertising agencies or third-party relationships

Exposure to

\$1 trillion

in online sales transactions on our clients' digital properties

30%

Criteo Retail Media revenue
comes from agencies

\$1.9 trillion

targeted digital ads delivered

Privacy, Data Protection and Content Control

Privacy and data protection laws play a significant role in our business

Employees and Human Capital Management

3,610⁵

employees (total headcount)

29,700⁶

training hours delivered to our employees

0%⁷

pay gap between women and men

41%

women employees

Research & Development

1,039

employees part of the Research &
Development and Product team

\$242.3 million

Research & Development expenses,
including expenses related to the Product group

⁵ This figure differs from the total headcount KPI presented in our Annual Report on Form 10-K because in this CSR Report we do take into account "inactive" employees (41 employees) whereas inactive employees are excluded of the Annual Report on Form 10-K KPI. See the Methodological note at the end of this Report). ⁶ Compliance pieces of training excluded. ⁷ See "Social - Compensation and Benefits" section of this Report.

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Our Corporate Governance

Our corporate governance framework enables our board of directors (the “Board of Directors”) and management to pursue our goals and strategic objectives in maximizing long-term shareholder value. The Board of Directors is strongly committed to best-in-class corporate governance and continuously seeks opportunities for improvement. Every year, the Board of Directors leverages shareholder feedback, results from the annual general shareholders meeting, the Board of Directors and committees’ self-assessments, governance best practices, and regulatory developments to further enhance our corporate governance framework.

For more information on corporate governance practices and Board Diversity, [please refer to our Proxy Statement here.](#)

Board Diversity (As of January 2024)

TOTAL NUMBER OF DIRECTORS: 8	WOMEN	MEN	NON-BINARY	DID NOT DISCLOSE GENDER
PART I: GENDER IDENTITY				
Directors	4	3		1
PART II: DEMOGRAPHIC BACKGROUND				
African American or Black				
Alaskan Native or Native American				
Asian				
Hispanic or Latinx				
Native Hawaiian or Pacific Islander				
White	4	3		
Two or More Races or Ethnicities				
LGBTQ+			1	
Did Not Disclose Demographic Background			1	

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Our Corporate Governance

Risk Oversight

Our Board of Directors, together with the audit committee, is primarily responsible for the oversight of our risk management activities. The Board of Directors oversees the Company's guidelines and policies with respect to risk assessment and risk management, including the Company's major financial, data privacy, and cybersecurity risk exposures and the steps taken to manage those exposures alongside the Company's contingent financial liabilities.

While our Board of Directors oversees risk management, our management is responsible for day-to-day risk management processes.

Our Board of Directors expects our management:

- To consider risk and risk management in each business decision;
- To proactively develop and monitor risk management strategies;
- To process day-to-day activities to effectively implement risk management strategies adopted by the Board of Directors.

For more information on risk management, please refer to [our 2023 Proxy Statement here](#).

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Our Culture and Values

At Criteo, we believe both great people and reliable products are key to making the future wide open.

Our **Code of Business Conduct & Ethics** is another presentation of **Criteo's values and commitments in terms of ethics and business conduct towards employees, communities, clients, and other stakeholders**. It also highlights our CSR commitments, further showcasing CSR as a core business imperative for Criteo. This is again a company-wide commitment, as the goals set in our Code of Business Conduct & Ethics can only be achieved through the engagement of all employees.

More information about our Code of Business Conduct & Ethics is available in the "Governance" section of this Report.

More information about our values [is available here](#)

⁸ Our culture book is [available here](#).

Criteo's values are "Open, Together, and Impactful" and define our culture⁸ as the company evolves:

OPEN.

We believe open minds build open futures. So, we have gathered a community of genuinely open and authentic people who care to shape a future that includes everyone.

TOGETHER.

We look for inspiring leaders who can also be supportive team players. We care about, encourage, and celebrate each other so we can build greater things together.

IMPACTFUL.

We innovate and empower our Criteo's employees to make a more sustainable and positive impact across our industry for our partners, clients, and the consumers they serve.

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Our Culture and Values

In 2023, Criteo launched a new framework called **“Criteo Leadership Behaviors”** focused on empowering employees to influence, lead, and fuel the company’s growth and success. It conveys three key messages: leadership at Criteo is about influence, not position; everyone is a leader; and unique contributions do matter. The new Criteo Leadership Behaviors framework focuses on six key behaviors shaping our common leadership culture:

“We aim for success. We own our impact. We grow through experience.”



We hold ourselves accountable and support each other without pointing fingers. We assess risks, we leap, and we learn by doing – all while supporting each other throughout the process.

“We do what we say. We say what we do.”



When we commit, we deliver. We turn strategy into action to make a greater impact in everything we do.

“In openness we trust.”



We strive to make ourselves worthy of each other’s trust. We understand that trust is not a given, it needs to be earned. Respect, inclusion, and authenticity underpin our culture and the way we connect with each other to achieve success.



“We drive impact through the way we partner.”

We team up with our clients, so we can succeed together. We define success as a win-win situation, always aiming to provide top-notch services to both internal and external clients.



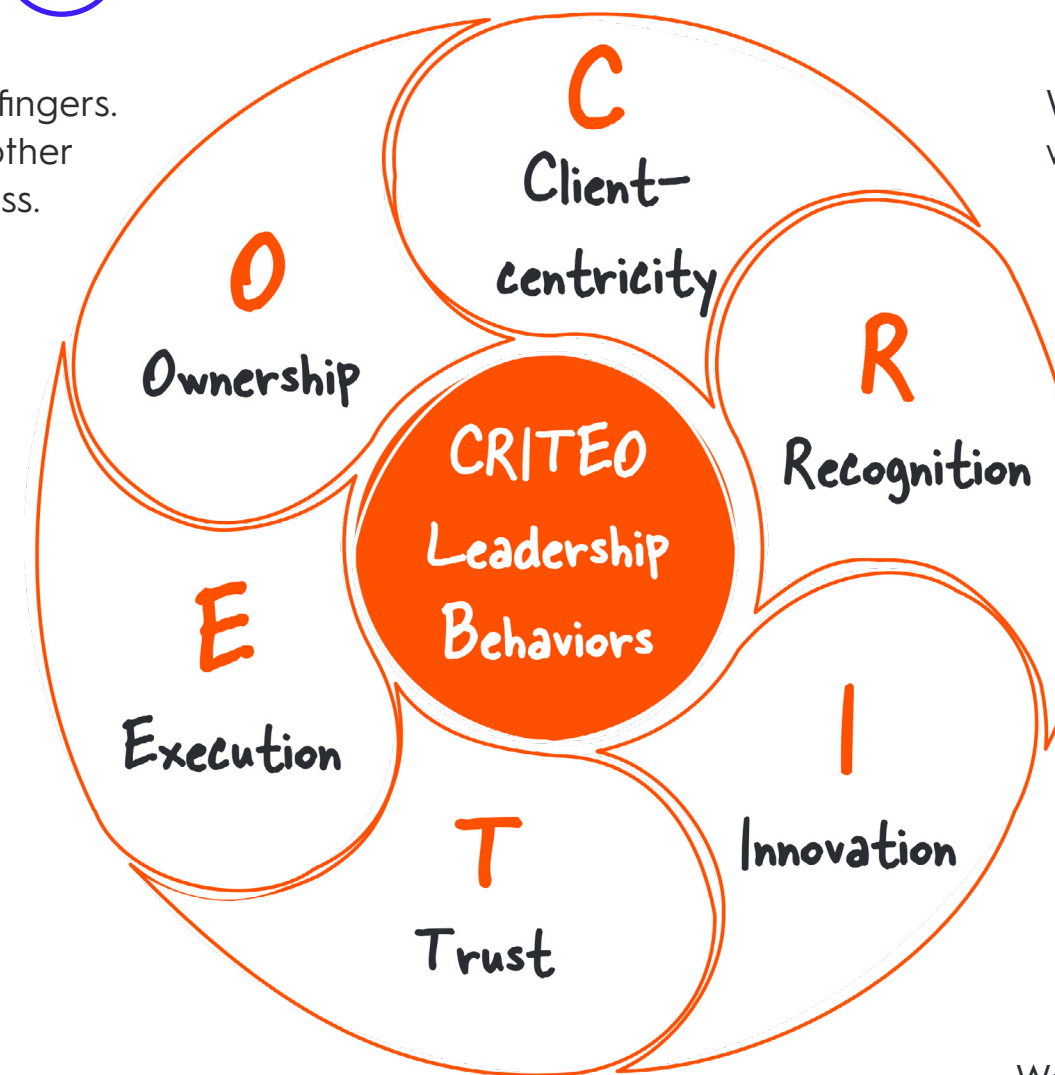
“We bring value through our words and actions and recognize impact. This is how we grow, together.”

We take the time to make sure that our contributions are recognized. We support and celebrate each other regularly. We do so in diverse ways that best reflect our individual needs, and this is what motivates and inspires us to be impactful.



“Alone, we open new doors. Together, we move mountains and create.”

We welcome bold minds with open arms to break new ground together. We nurture creativity while learning from experience, continuously improving day by day to foster innovation.



Approach to Corporate Social Responsibility (CSR)

Main CSR Challenges & Materiality Analysis

CSR Approach & Governance

Relationships with Stakeholders

Key Results & Objectives

Contribution to UNSDGs

SASB Concordance Table

TCFD Concordance Table

Awards & Recognitions

Main CSR Challenges and Materiality Analysis⁹

Main CSR Stakes for Criteo

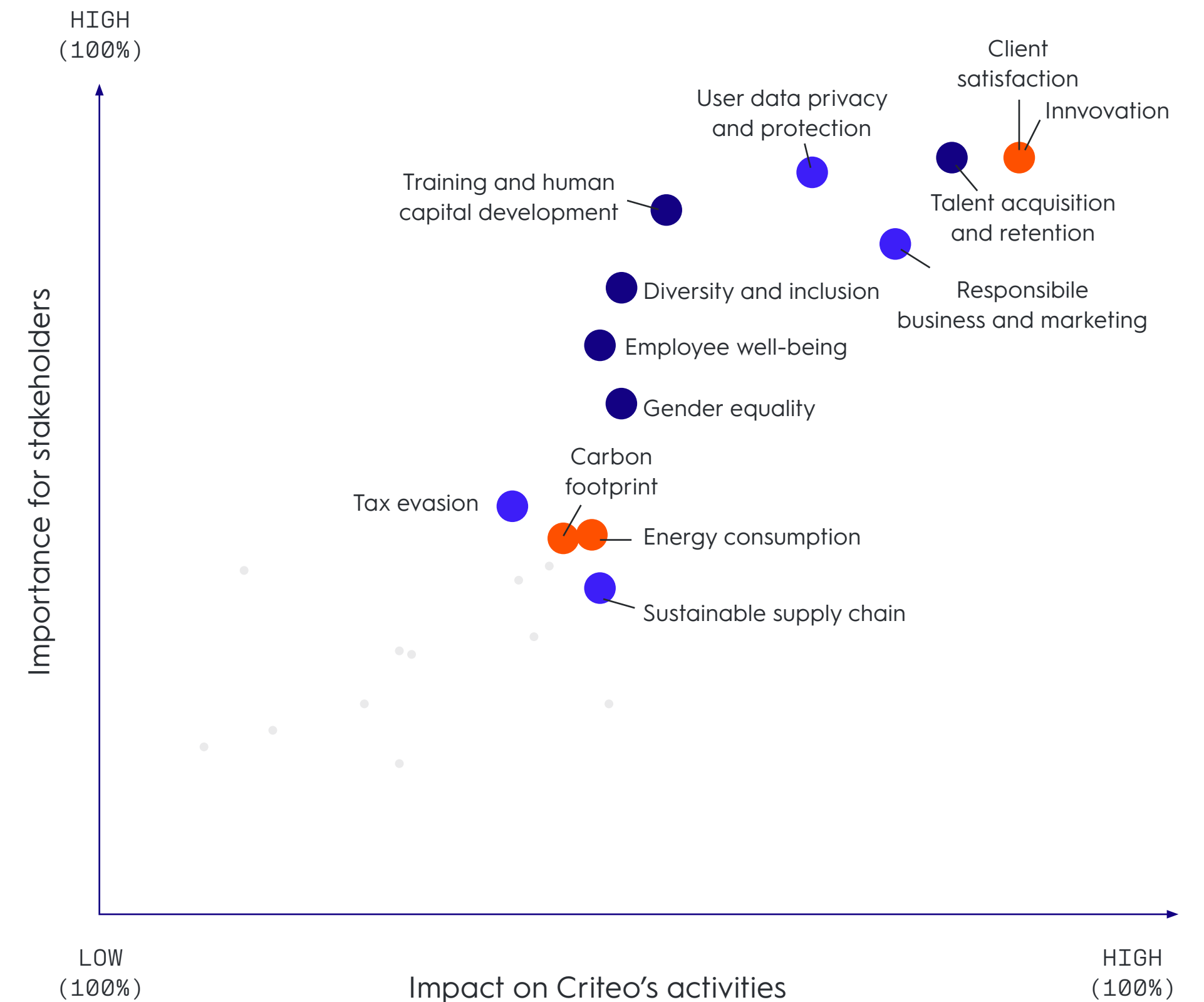
Criteo performed its first dedicated CSR risk assessment in 2018. We identified a list of relevant CSR-related challenges based on benchmarks from our business sector, and interviews which were conducted with internal stakeholders who work with the Sustainability team. These stakeholders assessed the stakes in order to define a priority list of areas of potential impact. Based on this analysis, Criteo selected eight main CSR topics. The alignment of the CSR risk approach with the Enterprise Risk mapping and the Corruption Risk mapping has been reviewed with the Internal Audit & Risks and Compliance teams in 2023.

Materiality Analysis

Furthermore, Criteo used the initial CSR analysis to perform its first materiality analysis in 2019. We have since updated the materiality analysis by interviewing employees from our teams (e.g., People, Talent Acquisition, Talent Management, Compensation & Benefits, Workplace Experience, Internal IT, Legal, and Investor Relations) as well as external stakeholders (suppliers, clients, partners, investors, etc.).

During those updates, stakeholders are asked to assess the importance and relevance of CSR topics related to Criteo’s activities. Combining the results of these interviews and the CSR stakes analysis mentioned above, we established our materiality analysis presented hereinafter.

CRITEO MATERIALITY MATRIX



⁹ As indicated in the "Disclaimer" section, this Report uses certain terms including "material" and "materiality" to reflect the issues or priorities of Criteo and its stakeholders. Used in this context, however, these terms are distinct from, and should not be confused with, the terms "material" and "materiality" as defined by or construed in accordance with U.S securities laws or as used in the context of financial statements and reporting.

Main CSR Challenges & Materiality Analysis

CSR Approach & Governance

Relationships with Stakeholders

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In 2021, **we also launched an online CSR survey** to better understand our external stakeholders' CSR expectations. This survey was answered by more than 30 stakeholders, amongst them were clients, suppliers, publishers, investors, analysts, and agencies. The priorities they highlighted are aligned with the results of our materiality analysis, the five topmost CSR topics identified through this survey being:

- 1 **User data privacy and protection**
- 2 **Client satisfaction**
- 3 **Employee well-being**
- 4 **Responsible business and marketing**
- 5 **Talent acquisition and retention**

This Report presents Criteo's policies, initiatives, and key performance indicators in relation to each of those material CSR matters, in the various sections listed in the table below:

CSR THEME	MATERIAL CSR TOPICS	SECTION
Environmental impact	Energy consumption	Environment - Reduce Criteo's Environmental Impact
	Carbon footprint	Environment - Reduce Criteo's Environmental Impact
Talent acquisition, development, and well-being	Talent acquisition and retention	Social - Supporting People Development and Talent Initiatives
	Training and human capital development	Social - Skills Management and Development
	Employee well-being	Social - Safety and Well-being at Work
	Inclusion, diversity, and gender equality	Social - Compensation and Benefits; Social - Diversity, Inclusion, and Equal Opportunities
Relation with clients	Client satisfaction	Social - Dialogue with Clients
	Innovation	Social - Skills Management and Development
Business conduct and ethics	User data privacy and protection	Social - Data Privacy and Information Security
	Responsible business and marketing	Social - Governance
	Sustainable supply chain	Environment - Natural Resources Consumption and Waste Management
	Global tax compliance	Governance - Global Tax Compliance

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Criteo strives for continuous improvement and positive impact in all areas of CSR, with a strong focus on the environment and Diversity, Equity, and Inclusion (DEI), while ethics have always remained a top priority. Together with our employees, partners, clients, and consumers, we can shape our future growth and define the value we want to create for society.

Environment

We reimagine our business practices to create a sustainable future for all while reducing our environmental footprint. We commit to environmental sustainability which drives our decision-making, changes our behaviors, and impacts the experience of our stakeholders.

Our environmental initiatives are carried out by our Sustainability team with the support of our “Green Community” (see “Environment” section of this Report). In 2022, we defined an environmental roadmap and have since set ambitious goals to improve our environmental impact. In 2023, we established carbon reduction targets and trajectories, which were approved by the Science-Based Targets initiative (SBTi) and implemented a greenhouse gas (GHG) emissions reduction and adaptation plan aligned with the Paris Agreement.

More information is available in the “Environment” section of this Report.

Diversity, Equity, and Inclusion

Our commitment to DEI embraces everything we do at Criteo, including how we work, how we treat each other, and the impact we have on our clients, partners, and the consumers we serve. Our initiatives are carried out by our DEI team and supported by five of our Employee Resource Groups (ERGs), introduced later in this Report (see “Social - Presentation of the Criteo Cares Program” section of this Report).

- **Diversity:** Increase our efforts to attract, hire, develop, and retain diverse talent. Represent varied identities and backgrounds, collectively and as individuals.
- **Equity:** Ensure equitable opportunities for learning, career, and compensation for all. Provide fair treatment, access, opportunity, and advancement for everyone at Criteo.
- **Inclusion:** Strengthen a sense of belonging for all employees, partners, clients, and the consumers we serve, as well as the sense of belonging and value that is felt throughout Criteo.

More information is available in the “Social - Presentation of the Criteo Cares Program” and “Social - Employee Relations, Inclusion, and Diversity at Work” sections of this Report.

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Sustainability Governance and Dedicated Teams

In 2023, we set up a **sustainability committee in charge of overseeing Criteo's sustainability strategy** and meets at least twice a year. This internal committee is chaired by our Chief People Officer and is made up of a mix of internal stakeholders, from various departments with relevant expertise and demonstrating a strong commitment to sustainability. **This committee reports to the governance, risk, and compliance committee (the "GRCC")**, which includes C-Suite members who oversee all topics related to governance, risk, and compliance.



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Relationships with Stakeholders

Dedicated teams maintain relationships with internal and external stakeholders through a variety of channels.

Criteo's main stakeholders include

- Employees;
- Clients, prospective clients, and publishers;
- Investors and shareholders;
- Technology partners, suppliers and subcontractors, and data-center operators; and
- Non-governmental organizations (NGOs).

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

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Disclosing our Impact

As part of our ongoing commitment to transparency and in line with investor expectations, we are focused on enhancing our ESG¹⁰ reporting. We have already adopted the Sustainability Accounting Standards Board (SASB) reporting framework¹¹, responded to the CDP¹² Climate Change questionnaire, and aligned with recommendations from the Task Force on Climate-related Financial Disclosures (TCFD) as shown in the CSR Approach section of this Report.

In 2023, Criteo once again responded to the EcoVadis questionnaire, addressing growing demands from our clients for visibility and transparency regarding our CSR practices. Benchmarking Criteo's CSR performance with other players in the industry helps refine our internal strategies and identify areas for progress. Thanks to the efforts made over the past year, Criteo progressed from a bronze to a silver EcoVadis medal.



¹⁰ Environmental, Social, Governance. ¹¹ See our SASB concordance table in the CSR Approach. ¹² Carbon Disclosure Project (CDP).

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Investors and Shareholders

Transparency and accountability continue to underpin everything we do. Our management team and our Investor Relations (IR) team are actively engaged with the investment community. In 2023, we participated in 26 investor conferences and non-deal roadshows.

Our comprehensive [Investor Relations website](#) contains presentations, webcasts, financial information, press releases, and other information about Criteo that investors may find useful. To drive further awareness of our CSR efforts, we increased our company's website disclosures to highlight important actions and commitments around key topics such as Diversity, Equity, and Inclusion (DEI), and the reduction of our environmental footprint.

In addition, we updated the terms of our €407 million (\$450 million) syndicated credit facility to a sustainability-linked credit facility ("Amended Credit Facility") in November 2023. The terms and conditions of our Amended Credit Facility are now linked to our sustainability goals to increase the representation of women in Tech roles and reduce our GHG emissions.

Shareholders can reach the Investor Relations team directly by sending an email to investorrelations@criteo.com.



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Criteo defined a set of **CSR objectives** that guide the main projects and initiatives we are carrying out or plan to implement in the future. The table below summarizes our CSR objectives as of 2023.

CSR TOPIC	AMBITION	TARGET	2023	2024	SECTION
Environmental Strategy	Define an environmental strategy and action plan	Identify and implement actions to reduce our environmental impact	Achieved	Pursuing action in 2024	Environment - Reduce Criteo's Environmental Impact
		Publish an Environment Statement and Policy	Published. Criteo's Environment Statement is available here .	Publishing the Environment Policy with SBTi-approved targets	Environment - Reduce Criteo's Environmental Impact
Greenhouse Gas Assessment		Measure Criteo's annual carbon emissions (scope 1, 2, 3)	Achieved through our partnership with SWEEP	Continuing annual measurement of Criteo's carbon emissions	Environment - Reduce Criteo's Environmental Impact
		Define carbon reduction targets and have them approved by SBTi	Received approval on Criteo's climate strategy by the Leadership team and approval on targets by SBTi	Progressing in line with our targets	Environment - Reduce Criteo's Environmental Impact
Data Centers (Infrastructure) and Offices	Limit the carbon footprint of our data centers	Use 100% of renewable energy to power our data centers	Achieved	Maintaining 100%	Environment - Environmental Impact of Data Centers and Hardware
	Manage other environmental impacts related to our data centers and offices	Track Criteo's annual office and data center water consumption	Offices: 12,558m ³ Data centers: 65 million L	Pursuing action in 2024	Environment - Environmental Impact of Data Centers and Hardware Environment - Environmental Impact of Offices and Travel
Business Trips and Events	Limit the environmental impacts linked to our events	Offset all travel related to our annual internal company event (Summit)	Not applicable	Not applicable	Environment - Reduce Criteo's Environmental Impact
	Limit the environmental impacts linked to our travels	Offset all carbon emissions related to business trips (air & train) and hotels	Achieved	Pursuing action in 2024	Environment - Reduce Criteo's Environmental Impact

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CSR TOPIC	AMBITION	TARGET	2023	2024	SECTION
Global Diversity, Equity, and Inclusion (DEI) Strategy	Maintain Inclusion scores	Maintain our Inclusion scores from the Inclusion Index at 75% or above (Targeted culture questions focusing on authenticity, psychological safety, belonging, and inclusive leadership)	79% in 2023	Maintaining 75% or above	Social - Diversity, Inclusion, and Equal Opportunities
	Increase the share of women in management	Increase the percentage of women being promoted (respecting proportionality principle)	42% in 2023	Maintaining 40% and above	Social - Diversity, Inclusion, and Equal Opportunities
Gender Equality	Increase the share of Women in Tech roles	Increase the percentage of women in Tech roles to reach 26% in 2030	20% in 2023	Maintaining 20% in 2024	Social - Well-being, Diversity, Equity, and Inclusion at Work
	Ensure gender pay parity through our Pay Parity Action Plan	Maintain pay parity throughout Criteo, with a bi-annual review and intentional actions in hiring, promotion, and pay cycle management	Achieved. Average compa-ratio was 0.90% for men and 0.90% for women before calibration	Maintaining Gender Pay Parity	Social - Supporting People Development and Talent Initiatives
Employee Engagement (Criteo Cares Program)	Increase employee engagement within the community groups	Increase the number of employees involved in (at least) one community group	41% in 2023	Maintaining 40% and above	Social - Presentation of the Criteo Cares Program
	Deploy the volunteering platform (Giving by Alaya/Benevity)	Increase the number of employees with an account	58% in 2023	Maintaining 55% and above	Social - Presentation of the Criteo Cares Program
Employee Skills	Provide access to training for our employees	Increase the percentage of employees trained (workshop & digital) - excl. all compliance pieces of training	75% in 2023	Maintaining 70% and above	Social - Skills Management & Development
Sustainability Governance	Strengthening the governance of our sustainability strategy	Set up an Internal sustainability committee and publish a charter	Achieved	/	CSR Approach - Our Sustainability Governance and Dedicated Teams
	Increase visibility and ownership of sustainability issues by all teams	Organize a quarterly meeting with the sustainability committee and disclose the participation rate	Organized 1 meeting in November 2023	Pursuing action in 2024	CSR Approach - Our Sustainability Governance and Dedicated Teams

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CSR TOPIC	AMBITION	TARGET	2023	2024	SECTION
Ethics	Train employees regarding compliance and ethics	Maintain the number of employees who completed the Code of Business Conduct and Ethics, and anti-harassment pieces of training	Achieved. 98% in 2023 for the Code of Business Conduct and Ethics, and 78% for the anti-harassment (+ 5% commenced/near completion)	Maintaining 80% or above each year	Social - Non-discrimination and Prevention of Harassment
Procurement	Assessing our company and our vendors	Set up a partnership with a Supplier Sustainability Rating Platform and assess key vendors on CSR by the end of 2023	Achieved. Completed Key Vendors CSR Assessment.	Maintaining 80% or above of critical and preferred vendors assessed in 2024	Environment - Environmental Impact of Subcontractors and Suppliers
		Obtain an EcoVadis rating by 2022, and improve it by the end of 2025	Earned the silver medal in 2023 (68/100 points)	Pursuing an improved rating	CSR Approach - Awards and Recognitions
Gender Diversity	Board of Directors gender balance	Have a minimum of 40% of each gender in our Board of Directors	Achieved. 50% women-men in the Board of Directors (4 women, 4 men)	Maintaining a minimum of 40% of each gender in our Board of Directors	Cf. Criteo's Proxy Statement (link is available in "Social - Compensation and Benefits")
	Named Executive Officers gender balance	Have a minimum of 40% of each gender in our Named Executive Officers	67% of our named executive officers are women (2 out of 3)	Pursuing action in 2024	Cf. Criteo's Proxy Statement (link is available in "Social - Compensation and Benefits")
Benefits	Transparency on our remunerations	Disclose the overall remuneration of the CEO compared to the average employee	Achieved	Pursuing action in 2024	Cf. Criteo's Proxy Statement (link is available in "Social - Compensation and Benefits")

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Contribution to Sustainable Development Goals (SDGs)

Criteo’s activities impact society and the environment through a wide range of programs for the company’s employees, our products and services, the infrastructure needed to deliver our products and services to clients, and our relations with stakeholders and other organizations throughout the tech industry. Our impact translates into **direct and indirect contributions to the United Nations’ 2030 Sustainable Development Goals (UNSDGs)**, an internationally recognized framework.



Criteo’s commitment to the United Nations’ SDGs

- 4 Quality Education
- 5 Gender Equality
- 8 Decent Work & Economic Growth
- 9 Industry, Innovation & Infrastructure
- 10 Reduced Inequalities
- 12 Responsible Consumption & Production
- 13 Climate Action
- 17 Partnership for the Goals

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4 Quality Education

GOAL: Ensure equal access to quality education for all and promote lifelong learning opportunities.

CRITEO'S CONTRIBUTION:

- **Internally**, we are **investing in educational and training initiatives** that help our employees continually elevate their skills and create new career and growth opportunities.
- **Externally**, we are focused on **expanding access to education through our "Education Community"**. Our goal is to support and help the under-represented segment of the employment market. In addition, we encourage community involvement with access to Volunteer Paid Days for all employees.

See "Social - Supporting People Development and Talent Initiatives" and "Social - Social Diversity" sections of this Report.

5 Gender Equality

GOAL: Achieve gender equality and empower all women and girls.

CRITEO'S CONTRIBUTION:

We have made significant contributions towards the empowerment and development of girls and women in the countries in which we operate, with a specific focus on removing barriers for women in the tech sector. For instance:

- As part of our **Pay Parity Action Plan**, we have reduced the gender pay gap to zero at Criteo in 2021 and have an action plan in place to monitor this indicator and ensure that equality is maintained.
- We committed to empowering staff from all backgrounds to fulfill their potential, achieving **26% of Women in Tech roles by 2030**.
- **Women@Criteo Community** is an inclusive Employee Resource Group promoting the advancement of women in the workplace through initiatives such as training and coaching, networking, and mentorship.
- Our commitment to Diversity, Equity, and Inclusion (DEI) extends to everything we do at Criteo, as highlighted in our [DEI policy](#).

See "Social - Criteo's Diversity, Equity, and Inclusion (DEI) Strategy" section of this Report.

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8 Decent Work and Economic Growth

GOAL: Promote inclusive and sustainable economic growth, employment and decent work for all.

CRITEO'S CONTRIBUTION:

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

- The **health, wellness, and safety of our employees** is a top priority. Our flexible working policies and best-in-class health and well-being benefits also contribute to enhancing our employees' overall quality of life.
- We ensure **equal opportunities for all employees** and job applicants, and do not tolerate discrimination of any kind.
- We embed and integrate respect for human rights throughout our business ([Human Rights policy here](#)).

See "Social - Safety and Well-being at Work" and "Social - Supporting People Development and Talent Initiatives" sections of this Report.

9 Industry, Innovation, and Infrastructure

GOAL: Build resilient infrastructure, promote sustainable industrialization, and foster innovation.

CRITEO'S CONTRIBUTION:

Our company's purpose is to support a fair and open Internet that enables discovery, innovation, and choice. Specifically, our research and development department is pioneering innovations in computational advertising. As a center of scientific excellence, our AI Lab delivers both fundamental and applied scientific leadership through **published research, product innovations, and new technologies**.

See "Social - Sustainable Relationships with Clients and End-Users" and "Governance" sections of this Report.

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10 Reduced Inequalities

GOAL: Reduce inequality within and among countries.

CRITEO'S CONTRIBUTION:

With **93 nationalities** represented in Criteo's global workforce, we are proud to have a very diverse organization. As part of our commitment to improving our culture of Diversity, Equity, and Inclusion (DEI) every day, we are focused on reducing inequality through several programs, for instance:

- Our **"Black, Indigenous, and People of Color (BIPOC) Community"** promotes initiatives to fight against racial inequalities and racism.
- Our **Empower U program** is an exclusive initiative dedicated to empowering high performers from underrepresented minorities/the global majority.
- Our Global Disability policy ensures our **"Criteable Community"** is also focused on improving the experience of employees who have disabilities at Criteo.

See "Social - Well-being, Diversity, Equity and Inclusion at Work" section of this Report.

12 Responsible Consumption and Production

GOAL: Ensure sustainable consumption and production patterns.

CRITEO'S CONTRIBUTION:

While we acknowledge that advertising generally encourages consumption, our supply partners are subject to content restrictions to ensure we promote responsible consumption, as outlined in our Supply Partner Guidelines. In addition, as a prominent member of the **Tech for Good initiative** since 2019, we are partnering with other industry stakeholders to define development models that put digital and technology at the service of a more sustainable future.

See "Social - Ethics in Our Ads" section of this Report.

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13 Climate Action

GOAL: Take urgent action to combat climate change and its impacts.

CRITEO'S CONTRIBUTION:

In 2022, we published our environmental strategy and action plan that reinforced our CSR strategy for the Environmental pillar. We strive to **minimize the environmental impact of our Data Centers** by increasingly relying on renewable energy sources and increasing our compensation efforts.

- We are also focused on **reducing our carbon footprint** by limiting travel and implementing various green office practices and initiatives led by our "Green Community".
- In 2023, **we established carbon reduction targets and trajectories**, which has been validated by Science-Based Targets initiative (SBTi) and we are implementing a greenhouse gas (GHG) emissions reduction and adaptation plan aligned with the Paris Agreement.
- In 2023, Criteo aligned **with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD)** framework and responded to the CDP Questionnaire (Climate Change, "C" rating).

See "Environment" section of this Report.

17 Partnership for the Goals

GOAL: Revitalize the global partnership for sustainable development.

CRITEO'S CONTRIBUTION:

We continue to partner with key stakeholders to promote initiatives that contribute to the UN Sustainable Development Goals for collective impact, for instance:

- Our partnerships with local charities – Education and mentorship;
- Our volunteering and giving platform (GIVING by Alaya/Benevity) – Social good;
- Our Tech for Good Commitment, our signature of the [LEAD Network pledge](#) – Gender Equality,
- Our Planet Tech Care Manifesto Commitment, our SBTi commitment, our response to the CDP questionnaire – Environment;
- Our commitment with the French association "L'Autre Cercle" (signing the LGBTQIA+ Charter) – LGBTQIA+ Community;

etc.

See "Social - Presentation of the Criteo Cares Program" and "Social - Well-being, Diversity, Equity and Inclusion at Work" sections of this Report.

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TOPIC	SASB CODE	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	DISCLOSURE
Environmental Footprint of Hardware Infrastructure	TC-SI-130a.1	(1) Total energy consumed (2) Percentage grid electricity (3) Percentage renewable	Quantitative	(1), (2) Gigajoules (GJ) (3) Percentage (%)	See "Environment" section of this Report.
	TC-SI-130a.2	(1) Total water withdrawn (2) Total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	(1) Thousand cubic meters (m ³) (2) Percentage (%)	Data not currently disclosed at Group level.
	TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion and Analysis	N/A	See "Environment" section of this Report.
Data Privacy & Freedom of Expression	TC-SI-220a.1	Description of policies and practices relating to behavioral advertising and user privacy	Discussion and Analysis	N/A	See "Social"; "Governance" sections of this Report.
	TC-SI-220a.2	Number of users whose information is used for secondary purposes	Quantitative	Number	Please refer to this page .
	TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Quantitative	Reporting currency	Please refer to our latest Annual Report on Form 10-K for material litigation.
	TC-SI-220a.4	(1) Number of law enforcement requests for user information (2) Number of users whose information was requested (3) Percentage resulting in disclosure	Quantitative	(1), (2) Number (3) Percentage (%)	Criteo does not publicly report this information as it is confidential.
	TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Discussion and Analysis	N/A	None of our core products and services are subject to government required monitoring, blocking, content filtering, or censoring.
Data Security	TC-SI-230a.1	(1) Number of data breaches (2) Percentage involving personally identifiable information (PII) (3) Number of users affected	Quantitative	(1) Number (2) Percentage (%) (3) Number	In 2023, we had zero data security breaches that required disclosure in our public SEC filings.
	TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	N/A	See "Governance" section of this Report.

¹³ Note: regulations in most countries where Criteo is located forbid the tracking of employee information related to their racial/ethnic group. As such, only gender data is available at the company level.

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TOPIC	SASB CODE	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	DISCLOSURE
Recruiting & Managing a Global, Diverse & Skilled Workforce	TC-SI-330a.1	Percentage of employees that are: (1) Foreign nationals (2) Located offshore	Quantitative	Percentage (%)	Criteo is a global company. Approximately 72% of employees work in offices outside of France. As of December 31, 2023, Criteo has approximately 22,5% of employees defined as foreign nationals who have work visas in the country in which he/she is employed. Compared to 12,9% in 2022.
	TC-SI-330a.2	Employee engagement as a percentage	Quantitative	Percentage (%)	See "Social - Presentation of the Criteo Cares Program" section of this Report.
	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for: (1) Management (2) Technical staff (3) All other employees	Quantitative	Percentage (%)	See "Social - Criteo's Strategy for Diversity, Equity, and Inclusion" section of this Report. Note: regulations in most countries where Criteo is located forbid the tracking of employee information related to their racial/ethnic group. As such, only gender data is available at the company level.
Intellectual Property Protection & Competitive Behavior	TC-SI-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Quantitative	Reporting currency	Please refer to our latest Annual Report on Form 10-K.
Managing Systemic Risks from Technology Disruptions	TC-SI-550a.1	(1) Number of performance issues (2) Number of service disruptions (3) Total clients downtime	Quantitative	(1), (2) Number (3) Days	Criteo does not publicly report this information due to its sensitive and proprietary nature.
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	N/A	Please refer to our latest Annual Report on Form 10-K.

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Introduction

In 2022, Criteo formalized its long-term, global environment strategy, paving the way for ambitious short-term and long-term action plans and energy reduction goals. In 2023, Criteo also responded to the [CDP Questionnaire](#) for the first time and received the “C” rating. Aligning with the TCFD framework is intended to help investors, lenders, and other stakeholders make more informed decisions and to understand how the company manages, identifies, and addresses climate-related risks.

Governance

Criteo is committed to a strong governance process for the oversight and management of the company’s sustainability efforts and energy reduction goals. Our Board of Directors’ nomination and corporate governance committee (NCGC) receives annual updates on the company’s sustainability performance and progresses from the executive management, led by the SVP Talent Development and Diversity, Equity, and Inclusion (DEI).

Our internal sustainability committee, chaired by the Chief People Officer, oversees the sustainability agenda and priorities and advises the GRCC on the Company’s goals, strategies, and commitments related to ESG, including climate risks and opportunities, human rights, community, social impact, and diversity and inclusion.

DESCRIPTION	REFERENCES
Board’s oversight of climate-related risks and opportunities	CDP Climate Change Questionnaire: C.1, C1.1.c
Management’s role in assessing and managing climate related risks and opportunities	CDP Climate Change Questionnaire: C1.2

¹⁴ Task Force On Climate-Related Financial Disclosures (TCFD).

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Strategy

Criteo has an Enterprise Risk Mapping (ERM) process in place, which is updated on an annual basis to identify and assess the risks that could materially impact the Company and its financial performance. In addition, Criteo seeks to understand and anticipate how climate-related risks and opportunities may have an impact on its business across the short, medium and long-term.

DESCRIPTION	REFERENCES
Climate related risks and opportunities identified over short-term, medium-term and long-term horizon	CDP Climate Change Questionnaire: C.2.1.a
Impact on businesses, strategy and financial planning	CDP Climate Change Questionnaire: C.2.1.b, C.2.3, C.2.4, C.2.4.b, C.3.2, C.3.5.a
Impact of different scenarios, including a 2 degree C scenario	CDP Climate Change Questionnaire: C.3.1, C.3.2

Risk Management

While we are still implementing a dedicated process for identifying and assessing climate-related risks, the Enterprise Risk Management (ERM) process in place aims to identify and monitor material risks for the Company. In connection therewith, material climate-related risks and their potential impacts are reviewed and assessed.

Our future climate-related risks and opportunity assessment will leverage this existing assessment to provide a detailed and comprehensive view on climate-related risks and opportunities to ensure a proper monitoring of the mitigation plans.

DESCRIPTION	REFERENCES
Process for identifying and assessing climate related risks	CDP Climate Change Questionnaire: C.2.1, C.2.1.a, C.2.1.b, C.2.2g, C.2.3, C.2.3.b
Processes for managing climate-related risks	CDP Climate Change Questionnaire: C.2.2g, C.2.3, C.2.3.b
Integration into overall risk management	CDP Climate Change Questionnaire: C.3.2, C.2.3.b

Metrics and Targets

Key Performance Indicators and targets are essential for monitoring progress and evaluating the effectiveness of environmental initiatives. In 2023, following our GHG assessment, we defined carbon-emission reduction targets to achieve by 2030, aligned with the 1.5°C scenario of the Paris Agreement. These targets were set in accordance with the Science Based Targets Initiative (SBTi)'s recommendations and have been approved by SBTi.

DESCRIPTION	REFERENCES
Metrics used by the organization to assess climate related risks and opportunities	CDP Climate Change Questionnaire: C.2.1b, C.2.3, C.2.3.b
Scope 1, 2 and 3 greenhouse gas emissions	CDP Climate Change Questionnaire: C.4.1, C.4.1.a, C.4.1.b, C.4.3, C.4.3.a, C.4.3.b, C.4.3.c, C.5.1, C.5.2, C.5.3,
Targets used and performance against targets	CDP Climate Change Questionnaire: C.4.1, C.4.1.a, C.4.1.b, C.4.2, C.4.2.a

Main CSR Challenges & Materiality Analysis

CSR Approach & Governance

Relationships with Stakeholders

Key Results & Objectives

Contribution to UNSDGs

SASB Concordance Table

TCFD Concordance Table

Awards & Recognitions

Awards and Recognitions

More information regarding our CSR and Diversity, Equity, and Inclusion awards [is available here.](#)

2022



Ragan's CSR & Diversity Awards
"Global Diversity, Equity, and Inclusion Commitment" and "CSR / ESG Engagement Communication"



Top 50 Inspiring Workplaces (NOAM)
Ranked #12



Family Friendly Company label
France

2022 & 2023

2023



Glassdoor
"Best Employer"



Comparably
"Best Global Culture"



Comparably
"Best HR Team"



Bloomberg
Gender-Equality Index member

2023



Diversio Diversity, Equity, and Inclusion Certification Level 1
"Inclusive Employer"



TLC Lions Being Human Awards 2023
"Most Human HR Strategy"



The Sunday Times
"Best Places to Work"
Medium Size Workplace
([more information here](#))



CDP Climate Change
C Rating



Ragan's Workplace Wellness Awards
"Mental Health Initiatives"
Winner & "Top Places to Work for Employee Well-being, Large Organization (More Than 1,000 Employees)" Honorable Mention

2024



EcoVadis Silver Medal
68/100 Rating

Reduce Criteo's Environmental Impact

CSRD concordance:
ESRS E1 - Climate change - Sub-topics: Climate change adaptation - Climate change mitigation - Energy

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Our Environmental Strategy and Initiatives

Our environmental strategy was defined in 2022, paving the way for **ambitious short-term and long-term action plans and energy-reduction goals.**

In line with that roadmap, we conducted several projects focused on climate in 2023. Many of those projects were proposed by dedicated internal working groups, each focused on specific categories of emission sources, where Criteo's employees brainstormed and identified suitable decarbonization levers.

For instance, we brought together event managers from several teams and drew up an "Event Sustainable Book" that provides clear guidelines and best practices on how to organize sustainable events, intended to be enriched over the coming years.

Thanks to input from our Travel, Procurement, and Sustainability teams, as well as Events and Green Community representatives, we also updated our travel policy to incorporate our sustainable development objectives, helping Criteo's employees to travel responsibly (e.g., reduce travel, give preference to public transportation methods such as railways, suggest staying in hotels with sustainable policies, etc.).



In 2023, another milestone was met as we set up Criteo's greenhouse gas (GHG) emission reduction targets for 2030, aligned with the 1.5°C scenario of the Paris Agreement. These targets were defined with the support of a consulting firm with climate expertise, then sent to the Science Based Target Initiative (SBTi), which validated them.

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All these actions align with our new [Environmental Statement](#) adopted in 2023. This Statement, as well as our efforts to reduce our carbon footprint, demonstrates our commitment to operate responsibly and is a step forward to drive a positive change in the industry. Our approach is based on the following objectives:

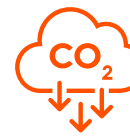
- Leverage our products, solutions, and services to build a sustainably conscious future,
- Progressing towards our GHG emissions targets, in line with the Paris Agreement, and
- Contribute to global neutrality via projects to offset part of our residual GHG emissions.

More information on Criteo's Environmental Statement [is available here](#).

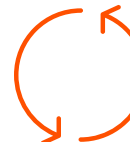
Our new Environmental Statement embodies how Criteo strives to adopt industry best practices to minimize the impact of our operations on the environment regarding main issues such as:



Resource Conservation: We continuously seek opportunities to conserve resources, reduce waste generation, and promote efficient use of energy, water, and other natural resources.



Carbon Emissions Reduction: We are committed to reducing our carbon footprint and mitigating the impact of our operations on climate change.



Sustainable Products and Services: We integrate environmental considerations into the development, design, and delivery of our products and services.



Supplier Engagement: We collaborate with our suppliers to promote sustainable practices throughout our supply chain.



Employee Awareness and Engagement: We raise awareness among our employees about environmental issues and empower them to contribute to our sustainability goals.



Continuous Improvement and Reporting: We regularly review our environmental performance and set targets for improvement.



Environmental Management Systems: We establish and maintain effective environmental management systems to ensure the implementation of this Policy and facilitate continuous improvement.

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Criteo also participates in leading initiatives that aim to reduce the tech industry's environmental impact, such as:



The **Planet Tech'Care Manifesto** (signed with the French Association Numeum¹⁵): This initiative brings together players from the French digital ecosystem who are committed to reducing their environmental footprint.



The **Alliance Digitale**¹⁶: This leading industry trade body in France organizes working groups in Europe to **measure the environmental impact of digital advertising campaigns** and developing solutions to **mitigate their inherent risks**. IAB Europe delivered a standardized framework to measure the carbon footprint of ad campaigns in 2023.

For some years now, Criteo has observed growing expectations from regulators and in public opinion on reducing the sector's environmental impact. We will continue to engage with policymakers to encourage sustainable industry standards.

¹⁵Numeum (previously called "Syntech numérique"). ¹⁶Alliance Digitale, formerly named "Interactive Advertising Bureau France" (IAB France).

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Criteo's Carbon Footprint



Our first overall carbon footprint assessment was conducted in 2022 (for the year 2021) with the support of external climate experts. This assessment covered Scopes 1, 2 and 3 and was carried out in accordance with the [Greenhouse Gas Protocol](#) (GHG Protocol). It helped us identify the main sources of emissions in our value chain and therefore pinpoints the most relevant decarbonization drivers for years to come.



We have since decided to deploy the [SWEEP](#) software to facilitate the collection and centralization of data, and thus make the reporting process of our carbon emissions more exhaustive. This tool enables us to cover emissions from the entire value chain, reusing the calculation methodologies developed during the first assessment and updating, and supplementing them where necessary. Thanks to the SWEEP software we can better monitor our carbon footprint results against the SBTi targets we have set this year. This helps us check and anticipate the impact of our decarbonization levers.

In our 2022 Report we communicated our carbon footprint based on 2021 data. With the deployment of the SWEEP software in 2023, we were able to assess the carbon footprint for Scopes 1, 2 and 3 for fiscal years 2022 and 2023.

Environmental Approach in Addressing Climate Change

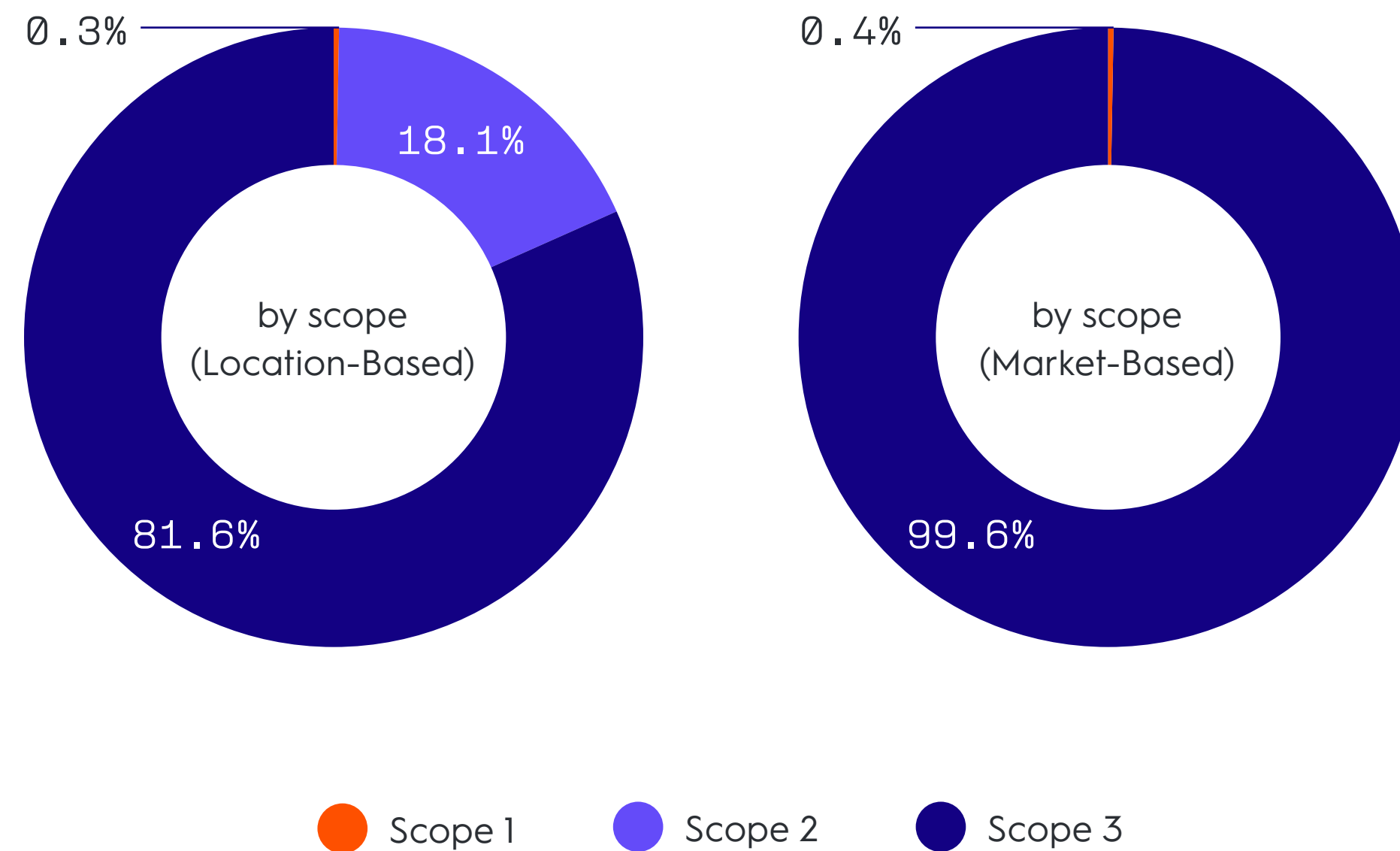
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Criteo's Carbon Footprint

The trends and results achieved in 2023 are presented in the graphs below.

CRITEO'S CARBON FOOTPRINT RESULTS BY SCOPE



SCOPE	2022(N-1 IN TC02EQ)	2023(N IN TC02EQ)	N/N-1 EVOLUTION
Scope 1	91	472	+418.7%
Scope 2 - Location-based	32,293	24,730	-23.4%
Scope 2 - Market-based	0	0	0%
Scope 3	119,143	111,462	-6.5%
Total CO2 emissions (scopes 1 + 2 + 3) - Location-based	151,527	136,664	-9.8%
Total CO2 emissions (scopes 1 + 2 + 3) - Market-based	119,870	111,933	-6.6%

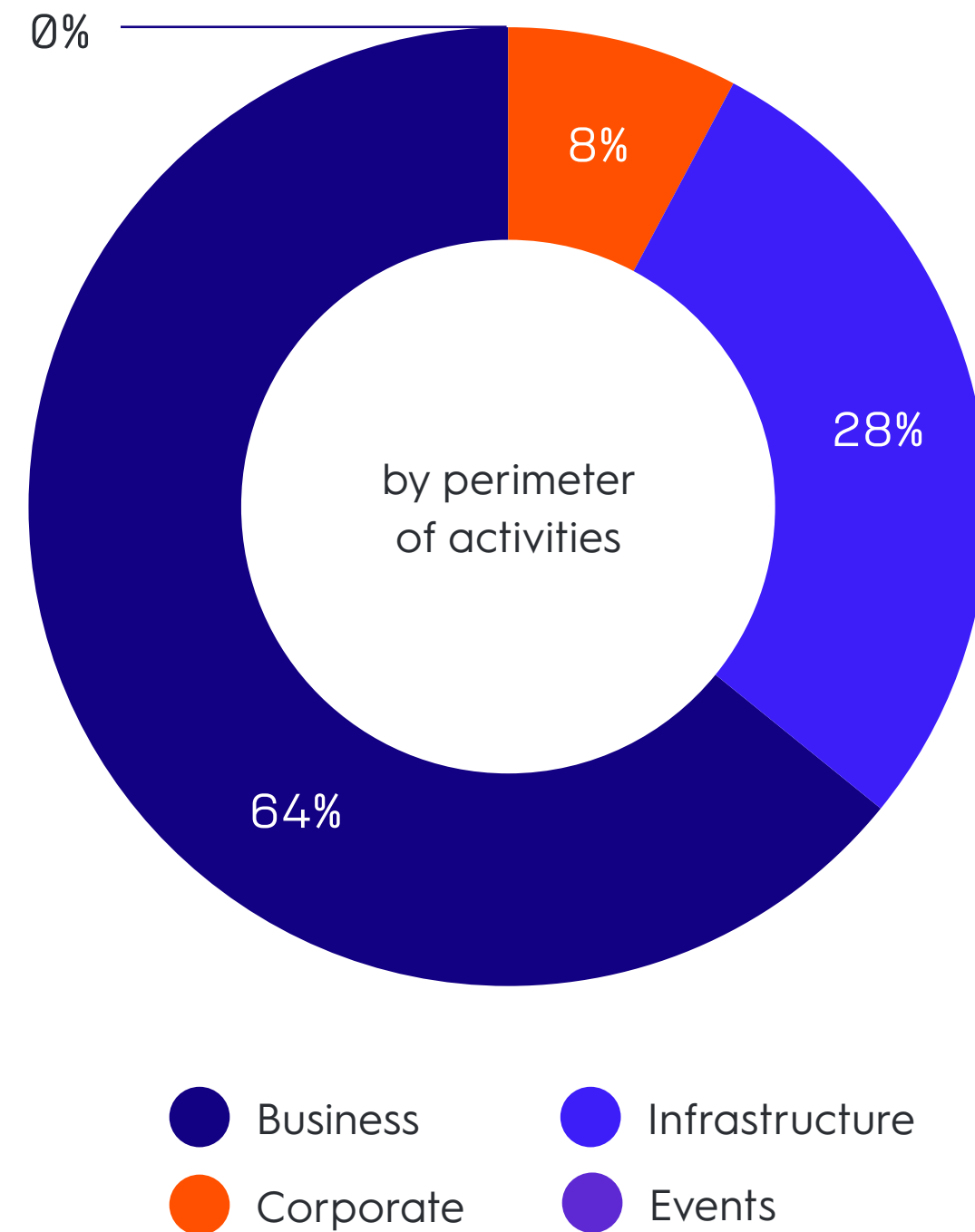
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Criteo's Carbon Footprint

CRITEO'S CARBON FOOTPRINT RESULTS BY PERIMETER OF ACTIVITIES



PERIMETER	2022(N-1 IN TC02EQ)	2023(N IN TC02EQ)	N/N-1 EVOLUTION
Corporate	10,684	10,344	-3.2%
Infrastructure	42,847	37,955	-11.4%
Business	92,386	88,152	-4.6%
Events	5,610	212	-96.2%
Total CO2 emissions (all perimeters)	151,527	136,664	-9.8%

Compared to revenue, the ratio of Criteo's carbon footprint for Scopes 1, 2 and 3 in 2023 thus amounted to **70 tCO2eq/million \$**.

As the results show, approximately **92% of Criteo's 2023 GHG emissions** were induced by the infrastructure and business perimeters (use of the Criteo solution), and almost all the emissions came from Scopes 2 and 3.

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Criteo's Carbon Footprint

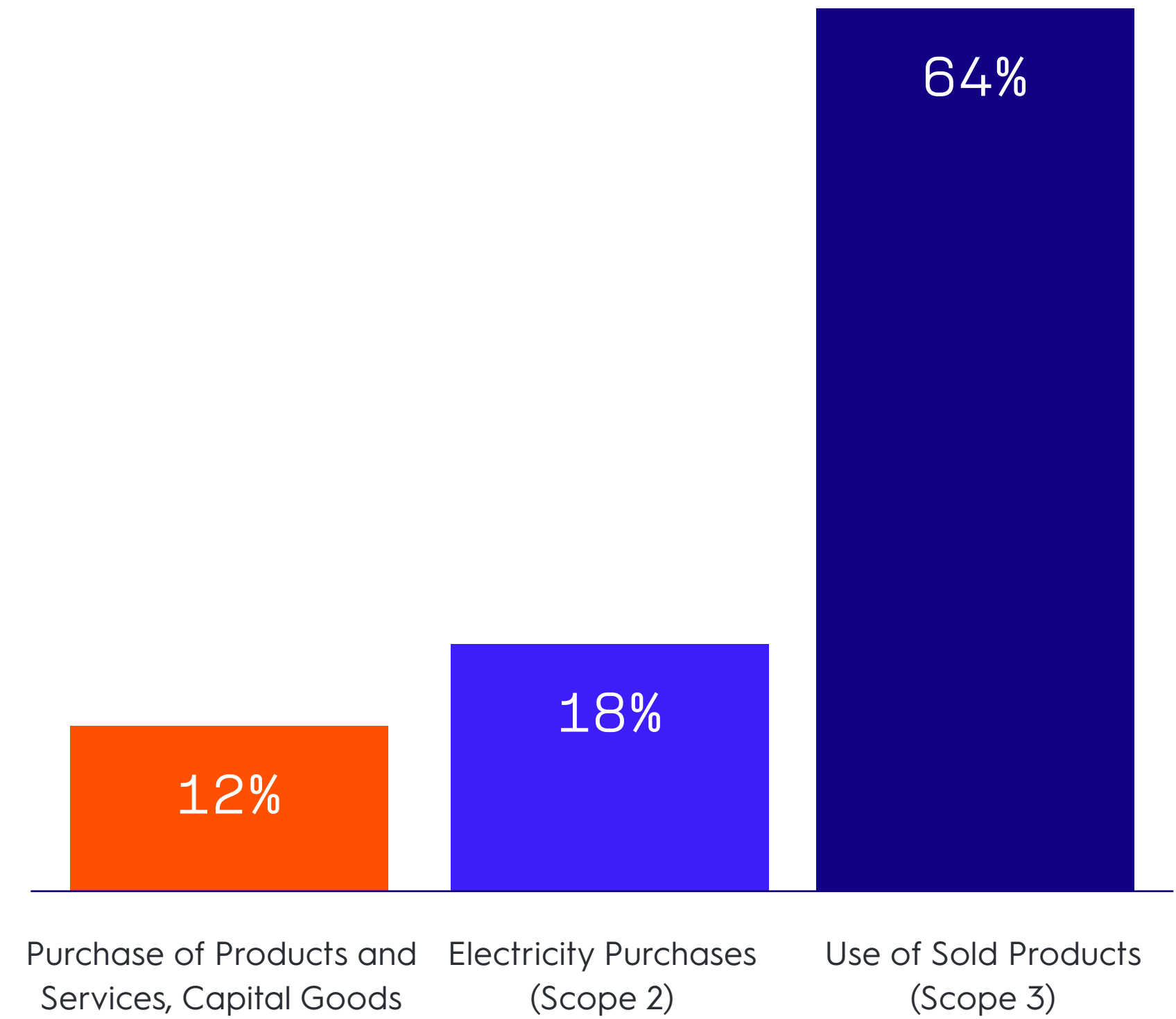
When diving into the assessment, we observe that:

- "Electricity purchases" (Scope 2) accounted for **18%** of total emissions.
- "Use of sold products" (Scope 3) accounted for **64%** of total emissions.
- The "purchase of products and services" and "capital goods" accounted for approximately **12%** of total emissions.

The evolution of our emissions between 2022 and 2023 highlights the efforts and actions undertaken this past year to reduce Criteo's environmental footprint across our entire value chain.

In 2022, Criteo published its Greenhouse Gas Emissions Report ([BEGES](#)) on the French Agency for the Ecological Transition (ADEME) website, based on the full carbon footprint calculated for 2021 and presented above ([more details here](#)). We will repeat this procedure regularly, as required by Article L 229-25 of the French Environment Code ([more details here](#)).

TOTAL EMISSIONS



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Climate Reporting Frameworks

We are committed to communicating with our stakeholders in a clear and transparent way, based on tangible elements that have been co-constructed and/or verified by external experts. We base our reporting on national and international frameworks to ensure the consistency, reliability, and comparability of the information we communicate.

For the first time in 2023, we responded to the CDP¹⁷ Climate Change questionnaire and we obtained a “C” rating.

The score achieved serves as a reference and will enable us to set targets for future years. We also used the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) to build our environmental strategy and low-carbon trajectories (see Concordance Table in the CSR Approach section).

¹⁷<https://www.cdp.net/en>.



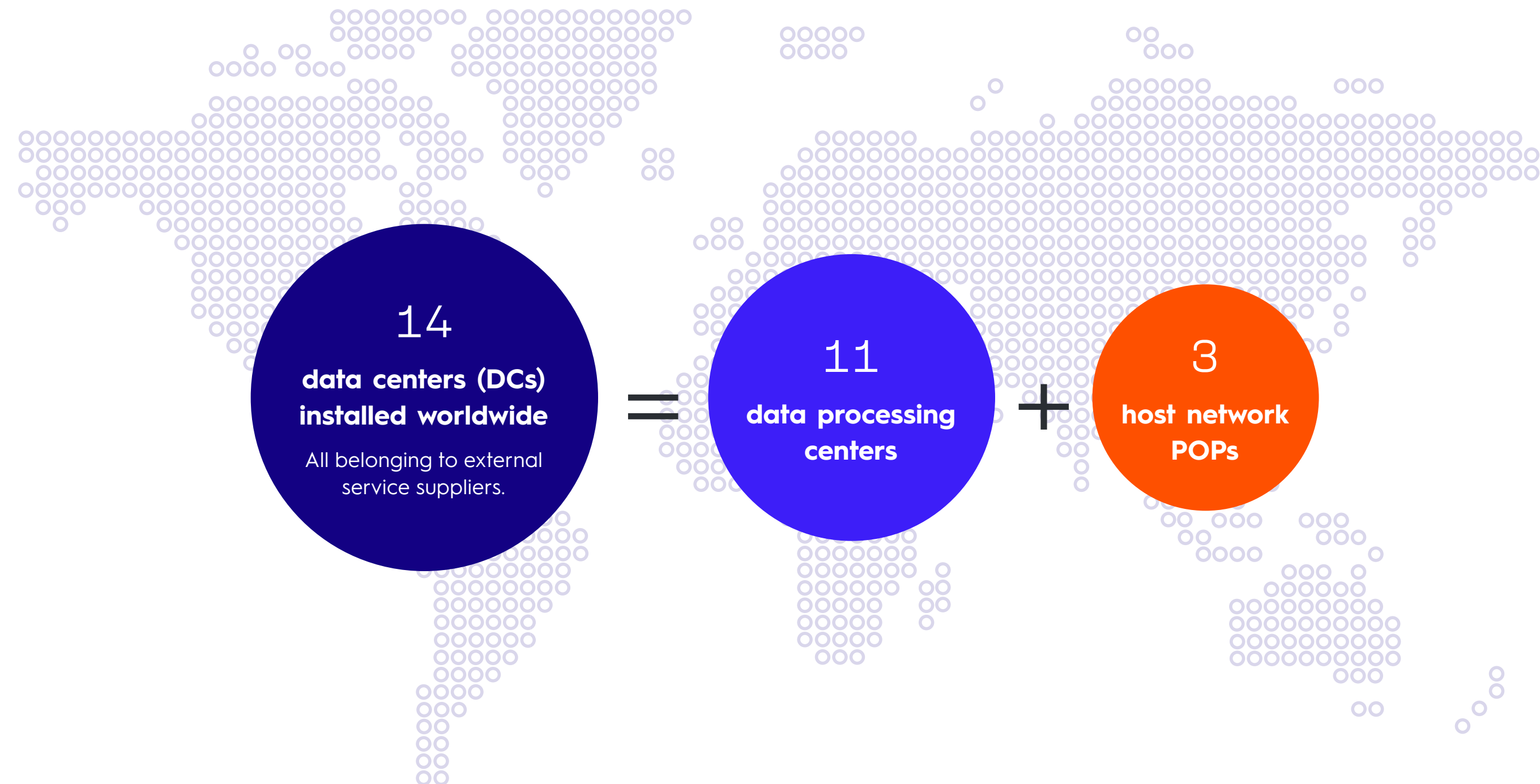
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Energy Consumption and GHG Emissions due to Data Centers

Criteo's operations rely on **large data center units and several smaller networking rooms**, also known as **Points of Presence (POPs)**.



As of December 31, 2023, Criteo had servers installed in 14 data centers (DCs) worldwide, all belonging to external service suppliers. Among those 14 data centers, 11 are data processing centers, and the remaining 3 host network POPs.

Criteo's server infrastructure accounts for one of its largest environmental impacts (28% of Criteo's overall carbon footprint, and more than 98% of Criteo's total energy consumption). A team dedicated to capacity planning oversees the optimal allocation of infrastructure resources according to business objectives, dedicated full-time to optimizing Criteo's infrastructure usage regarding costs and power usage.

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Relocation and Rightsizing

As part of a continuous effort to reduce emissions, Criteo relocated several data centers in 2023. Data centers spotted with high emissions during our 2022 environmental analysis were particularly targeted for these relocations. For instance, one of the data centers with the biggest carbon footprint in Amsterdam is being relocated to Paris, with a lower carbon footprint.

Data center rightsizing is another long-term and continuous effort, which involves resizing data centers in terms of server volume to **increase energy efficiency** all while maintaining the **same quality of service** – and **responding to future business growth**. Rightsizing continued in 2023. For example, the sites in Paris and Amsterdam benefited from architectural changes, reducing the number of resources (servers, power) used. With the thorough machine refurbishing that was performed in recent years, Criteo believes that one new server in operation now performs at least as much work as the two previous ones: the new processors are answering twice as many requests per second for one watt consumed (QPS/Watt).

As part of our efforts to reduce the environmental impact of data centers, the servers and machines in inventory are also being shut down when not used. This represents around a 3% saving of our annual power electricity consumption. For maintenance purposes, they might be switched back on once a week to check their proper functioning but are turned off otherwise.

Beyond energy efficiency, the overall environmental footprint of the server infrastructure across its lifecycle must also be considered when identifying the characteristics that will result in minimal environmental impacts. That is why Criteo assesses its carbon footprint covering the entire lifecycle of its infrastructure specifically, in addition to the company-wide carbon footprint assessment (see later in this Report for more information). Results from this assessment helps us define the most sustainable approach.



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Working with our Vendors

Criteo actively seeks to enhance **sustainable practices among vendors of services** (hosting and hardware recycling) as well as **hardware procurement**. For this purpose, we established in 2023 an **Infrastructure Sustainability Procurement Policy** which outlines our commitment to integrating sustainable practices into our procurement processes for infrastructure activities (see the “Suppliers and Subcontractors” section for more information). For each new project, Criteo releases a request for proposal (RFP), and sustainability is one of the criteria of the decision factors. This criterion encompasses questions about energy-saving processes, sources of energy of the data center, power usage effectiveness (PUE)¹⁸ which shouldn’t exceed a rate of 2, sustainability strategy or programs of the providers, certifications, and other related topics. For instance, all data centers are covered by international certifications related to energy efficiency¹⁹. The hardware devices we purchase require open-source possibilities to avoid software end-of-life limitations and increase hardware repairability and spare part availability.

¹⁸ 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. ¹⁹ LEED, USA EnergyStar, ISO 50001, ISO 140001, ISO45001:2018, SS564:2010, BCA-IMDA.



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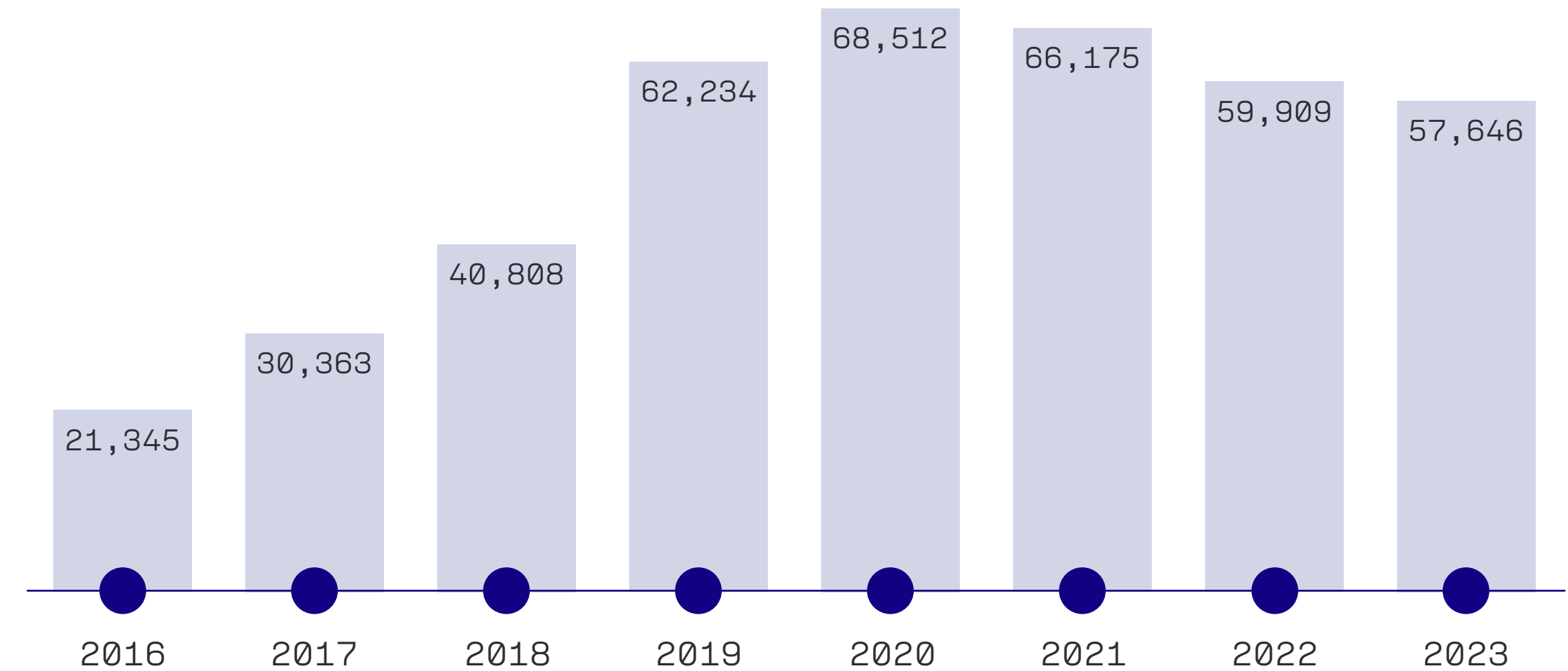
Energy Consumption and GHG Emissions due to Data Centers

Since 2022, we have been able to retrieve data directly from data centers. Data is collected automatically in real-time, with better accuracy, as it can now be tracked at the rack level (not only at the room level). This new process improves data reliability and real-time visibility on all data centers' energy consumption, and thus helps define action plans tailored to Criteo's actual consumption.

While the **electricity consumption of data centers has increased** since 2016 as a result of our activity growth, when compared to revenue, **this indicator remains stable with 29.6MWh per million USD in 2023, compared to 30MWh per million USD in 2022**. The related CO2 emissions are similarly controlled and have kept decreasing thanks to our efforts in reducing the carbon footprint, as shown in the graphs hereinafter. When we cannot supply data centers directly with decarbonized energy, we offset the carbon emissions by buying renewable energy certificates (RECs).

ELECTRICITY CONSUMPTION AND CO2 EMISSIONS IN DCS	2022 (N-1)	2023 (N)	VAR.
Total electricity consumption	59,909 MWh	57,646 MWh	-3.8%
Share of decarbonized energy	100%	100%	0%
Share of electricity from renewable energy sources	24%	32%	+33.3%
Share of electricity offset through certificates	76%	68%	-10.5%
CO2 emissions generated by data centers (post offsetting efforts) ²⁰	0 tCO2eq	0 tCO2eq	0%

DATA CENTERS' ELECTRICITY CONSUMPTION 2016-2023 (MWH)



²⁰ Regarding the calculation method of CO2 emissions, for data centers totally powered with renewable energy or for where we use renewable energy certificates to offset emissions, the emissions are considered to be zero. For the other data centers the local factor is used (for more details, see methodological note).

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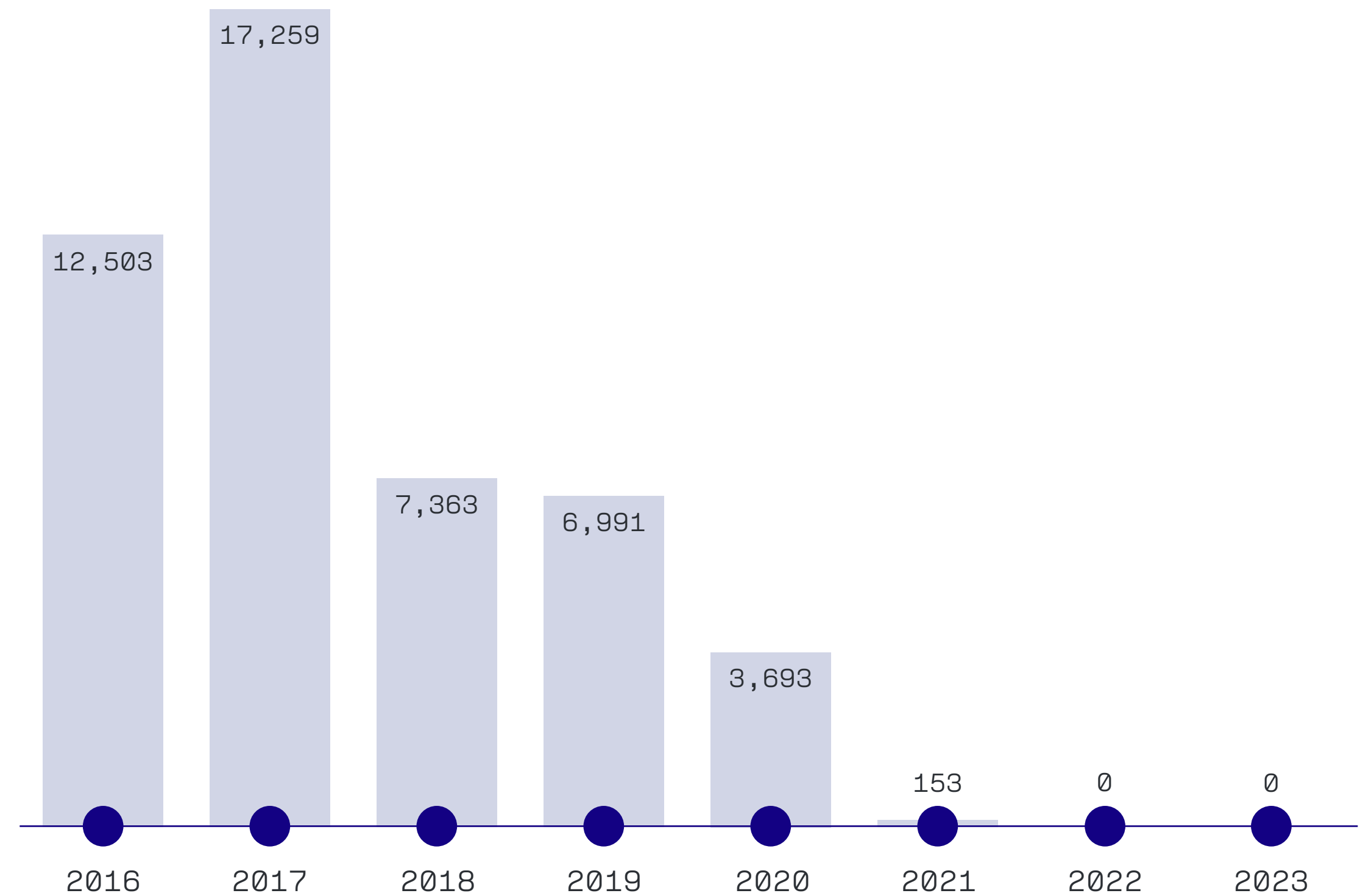
Environmental Impact of Offices & Travel

Energy Consumption and GHG Emissions due to Data Centers

As of 2023, **100% of the data centers' energy consumption** (market-based) is supplied from decarbonized sources or offset through certificates²¹.

Based on Criteo's specific assessment of the carbon footprint for the entire lifecycle of the IT Infrastructure, it remains **distributed between Scope 2 (power usage) and Scope 3 (manufacturing and end-of-life) with respectively 64% and 35% emissions in 2023.**

DATA CENTERS' CO2 EMISSIONS 2016-2023 (TEQ CO2)



²¹Data on data center energy consumption is available between January and March 2024. To ensure their availability for the report, suppliers signed a temporary attestation in early 2024. Once available, the actual data for 2023 will be reviewed and validated by our teams in mid-2024.

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Energy Consumption and GHG Emissions due to Data Centers

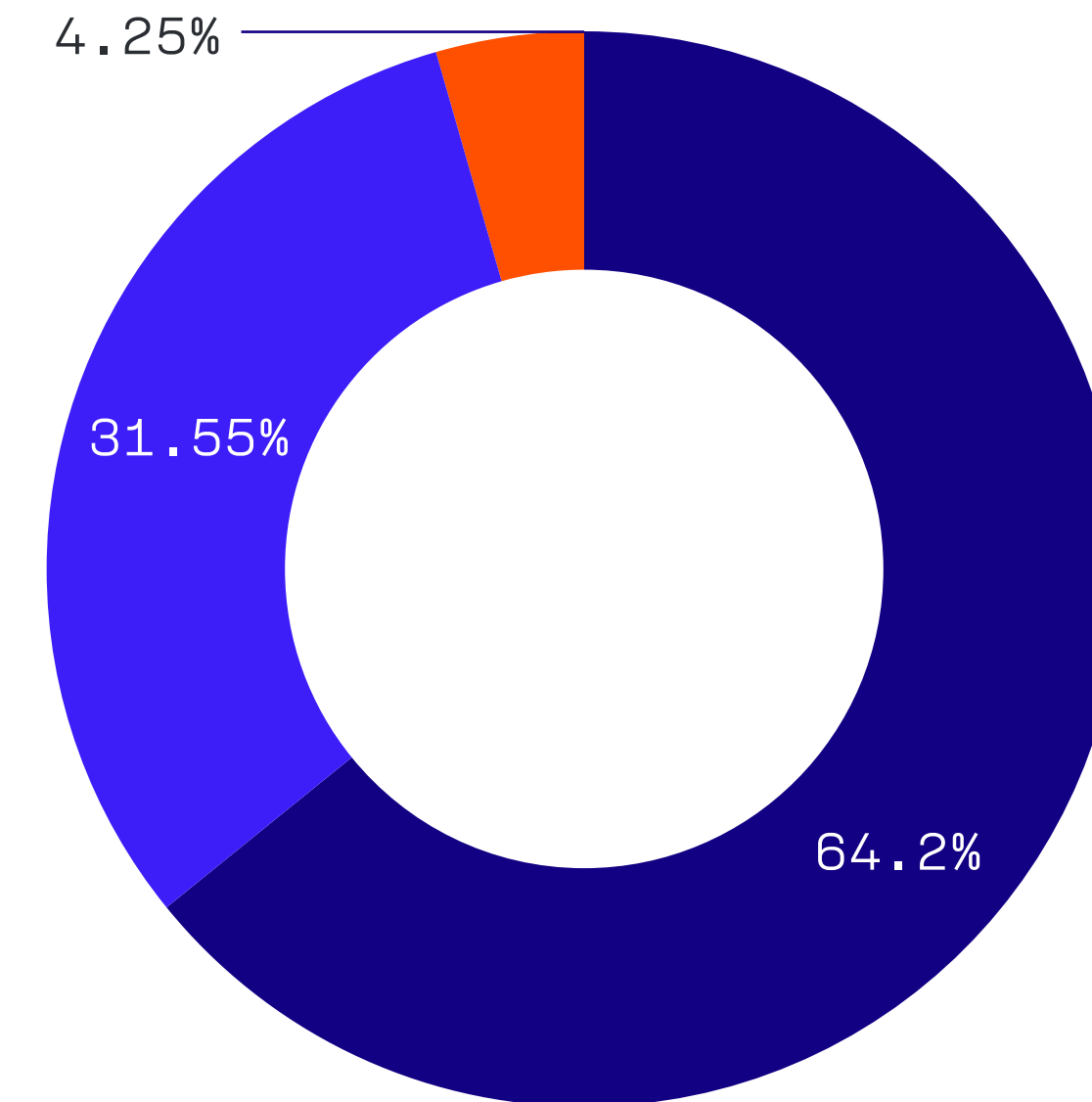
2023

37,955 tons of CO2eq (compared to 40,000 tons of CO2eq in 2022).

The perimeter of each emission category is defined below²²:

- **Electricity consumption:** the emission related to the electricity directly consumed by the data center during the year.
- **Purchases of goods and services:** the emission related to the manufacturing and delivery of the servers.
- **Others:** all other topics related to the data center: network, bandwidth, cables, fibers, and waste.

CO2 EMISSIONS OF DATA CENTERS IN 2023



● Electricity consumption
 ● Purchases of goods and services
 ● Others

²² Methodology: The power consumption of the data center for the year and the servers purchased during the year. This methodology does not take into account the servers already in production.

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Green Offices

While Criteo does not own the buildings it occupies, we have undertaken a company-wide commitment to limit their environmental impact.

This starts with the selection of our buildings. Each office location is reassessed every five years, when contracts with landlords are set for renewal. This assessment considers increasingly demanding environmental factors. Our global action plan is to move to better offices in terms of the environment whenever possible, ideally certified LEED²³ or BREEAM²⁴. Thus, many of our offices were built according to high environmental quality building norms²⁵. The Boston office building, one of the two leases Criteo signed in 2023, is Energy Star certified. More information on our Energy Star certification [can be found here](#).

2023

The equivalent of 61% of our leased offices are covered by a green certification based on office area in m² (compared to 66% in 2022).

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 the buildings has thus become a key decision factor for Criteo.

Optimizing use of Office Space and Real Estate Footprint

With Criteo's **Flexible Work Approach** (see "Social - Safety and Well-being at Work" section of this Report), we optimize workspaces around the world – for instance, by closing a few leased sites (e.g., Singapore) and several private spaces for co-working (e.g., Amsterdam, Madrid, Milan). All workspace changes implemented are carried out with consultation from employees and following behavioral studies to ensure that employees can continue to work in the best conditions.

In locations where Criteo does not have specific workspaces (leased offices or co-working spaces), a Space-on-Demand program, called "Upflex" has been implemented. Under this program, Criteo's employees have access to a large portfolio of co-working spaces where they can book a desk, meeting room, phone booth, and private office – allowing them to work away from home when necessary, thus reducing their commuting time and carbon footprint. Furthermore, every time an Upflex space is booked, Upflex commits to planting a tree with Trees for the Future²⁶.

²³ Leadership in Energy and Environmental Design (LEED). ²⁴ BRE Environmental Assessment Method (BREEAM). ²⁵ In Paris, the building housing Criteo's headquarters is NF HQE certified. The Singapore office is in a building that has been awarded the prestigious Green Mark Platinum Award. The Barcelona office is in a LEED Gold building property. Our London office is in a BREEAM certified building. The Boston office is certified Energy Star. ²⁶ More details on Trees for the Future [can be found here](#).

Environmental Approach in Addressing Climate Change

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Energy Consumption and GHG Emissions due to Offices and Travel

Criteo strives to reduce the energy consumption of offices, such as automatically switching lighting off at night or relying on motion sensors, using energy-efficient LED lighting, configuring all laptop's default settings to go into sleep mode when the laptop is not used and into low battery mode (lower energy consumption) when it is not plugged in. The air-conditioning system is automatically shut off or significantly reduced during the evening after regular working hours in several offices. Heating, ventilation, and air conditioning in major offices such as New York and Tokyo are set to run during reasonable working hours at an adequate preset temperature.

Another impactful initiative was switching to energy from renewable sources wherever possible. In Ann Arbor (Michigan), we signed up for a "voluntary green program" in June, enabling existing electricity customers to go 85% clean, bringing the 2023 renewable energy portion to 51%.

Our office energy consumption has dropped since 2020 with a significant decrease in consumption in the EMEA offices. These results are the consequence of the widespread teleworking work habits that have spread across Criteo since the pandemic and that will remain in place as part of our Flexible Work Approach (see "Social - Safety and Well-being at Work" section of this Report).

In 2023, the scope for data collection was expanded and now includes the small offices (with less than 50 employees) along with the offices of Iponweb, which accounts for the increase observed.

ELECTRICITY CONSUMED IN OFFICES	2022 (N-1)	2023 (N)	VAR.
Total office electricity consumption	1,274 MWh	1,590 MWh	+24.8%
Total per employee	0.41 MWh/employee	0.44 MWh/employee	+7.3%
% from renewable energy sources	38%	29%	-23.7%

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Energy Consumption and GHG Emissions due to Offices and Travel

While a significant drop in business travel was observed in 2020 due to the Covid-19 pandemic, business travel has since increased again and Criteo has therefore continued its efforts to reduce the number and impact of these trips.

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

In 2023, all emissions related to business trips and hotels have been offset with VCS²⁷ certified credits through a partnership with the non-profit, Tree-nation ([see more information here](#)).

CO2 EMISSIONS	2022(N-1 IN TCO2EQ)	2023(N IN TCO2EQ)	VAR.
From electricity consumption (offices) - in tCO2eq	303	462	+52.5%
From business trips - in tCO2eq ²⁸	2,318	4,744	+104.7% ²⁹
From commuting - in tCO2eq ³⁰	68	77	+13.2%
Carbon footprint per employee (offices consumption + business trips + commuting) - in tCO2eq/employee	0.86/employee	1.46/employee	+69.8%

DEFRA coefficient has significantly increased in 2023 (this coefficient has undergone minimal change in the previous years) which led to a growing carbons emission data³¹.

²⁷Verified Carbon Standard CO2 Certification. [Learn more here](#). ²⁸Business trips include business trips by plane and business trips by train. ²⁹2022 and 2023 data cannot be compared due to a change in methodology, with the addition in 2023 of new emissions sources such as hotel stays and taxi trips. ³⁰More information is available in the methodological note at the end of this Report. ³¹For more relevancy, the emission factor used to calculate carbon emissions linked to travel has been updated between 2022 and 2023. This updated emission factor has therefore significantly increased our travel-related carbon emissions.

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Environmental Impact of 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 these processes include Corporate Social Responsibility (CSR) criteria.

In 2017, Criteo rolled out its global procurement policy, that has been continuously updated since and was replaced with a **Sustainable Procurement Policy in 2023**. This Sustainable Procurement Policy emphasizes Criteo's and the Procurement team's commitment to integrating sustainability into their selection of suppliers to create a more eco-conscious network. Through this policy, Criteo notably aims to integrate CSR considerations into procurement, focusing on risk management, refining procurement roles and missions, and clearly explaining our CSR goals. Furthermore, as explained earlier in this Report, we added an appendix to this policy covering infrastructure sustainability procurement. Through this policy, Criteo reinforced its goals towards sustainability.

The sustainable objectives in this new policy are stated as follows:

- To **minimize** the environmental impacts of infrastructure activities;
- To **improve** resource efficiency and reduce waste;
- To **achieve** long-term cost savings through sustainable procurement practices;
- To **comply** with relevant environmental laws and regulations.

Similarly, our Travel policy was replaced by a new **Sustainable Travel Policy** to be effective as of 2024. This revamped policy emphasizes the sustainable travel practices of our employees. This Sustainable Travel Policy highlights the situations when air travel is not allowed, as well as details on how to book an environmentally friendly hotel through our partner, [Egencia](#). Besides outlining tangible actions to become more sustainable, this policy includes a clear focus on increasing our employees' awareness of their responsibility to travel less frequently and in a more sustainable manner.

All these policies intend to provide a general framework bringing more sustainability to our day-to-day purchase activities like our RFPs' process.

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Environmental Impact of Subcontractors and Suppliers

All new RFPs automatically and systematically include a CSR assessment developed by our Procurement teams. This internal CSR assessment includes 10 questions. This in-house CSR assessment is requested if the supplier has no EcoVadis score or a score below 50. Criteo also signed a partnership with [EcoVadis](#) in 2022 to work on defining the basis of its sustainable Procurement approach. The combination of our internal CSR assessment and the EcoVadis ranking allows a fair grading of suppliers based on sustainability. The CSR score assigned to suppliers' accounts for at least 5% of the final overall scoring system. The weight of the CSR score can be higher than 5% depending on the vendor's critical level of the RFP.

The objective is to increasingly include CSR criteria in Criteo's vendor selection process, and to engage our network in this transition.

Our practices regarding sustainable procurement are strengthened and supported using a new Vendor Risk Management (VRM) tool implemented in 2023: [GraphiteConnect](#). Since the launch of our VRM tool, 170 vendors have already been vetted – representing about 10% of our active vendors' base.

This tool is set to streamline, optimize, and secure the process of working with new vendors. The solution helped our employees navigate through the procurement process from project identification to contract signature and vendor onboarding. GraphiteConnect is made to automate Vendor analysis, ensuring adherence to our stringent CSR, Finance, Compliance, IT, Security, and Legal standards. It represents a significant step forward in efficiency and risk management for Criteo.

In accordance with the risk level, Criteo will require an appropriate action plan from the vendor if they are willing to keep working with Criteo.

As already mentioned in the Report, Criteo's commitment to Health, Safety, and the Environment (HSE) is evidenced by our requirements 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, responsible procurement, and certification.

Regarding data compliance, the Procurement team and the Compliance team worked on a new version of the Code of Business Conduct. The Code of Business Conduct is signed by suppliers based on their compliance risk assessment ([available here](#)).

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Employees' Green Initiatives

Historically, Criteo has relied on local initiatives to promote environmental responsibility, led by employees. Since 2020, Criteo Cares initiatives have spread across all business units and countries. Learn more about the Green Community and Environment at Criteo hereinafter.



The Green Community aims to raise awareness of climate change and support the company's transformation to a more responsible future. Our group of **nearly 500 passionate volunteers** is active throughout the year, and especially during eco-conscious celebrations such as Earth Day (in April) and Environmental Month (in September) at Criteo. In parallel, several Climate Collage sessions have been organized by Green Community active members in our Paris office. Also, our Green Community participated in our first multi-week global volunteer program in about 20 locations around the world.

Our Chief People Officer and Chief Technology Officer, both executive sponsors of the Green Community, regularly participated in community events such as clean-up missions, Earth Day talks, etc.

Additionally, our community also developed awareness content such as the **Green Guidelines**, which provide tips for our employees to adopt environmentally friendly behaviors in the office, and the **Green Learning Path**, which provides our employees with valuable resources to tackle environmental challenges better. The Green Community was also instrumental in defining Criteo's environmental strategy (see "Environment - Criteo's Environmental Approach in Addressing Climate Change").

This year's Hackathon saw the creation of the "Green Learning Path" mentioned above, designed to provide a 5-minute training course, particularly for newcomers, introducing them to Criteo's environmental strategy, eco-responsible best practices to adopt, and ways to get involved through Criteo's actions. This module is included in the onboarding process and aims to be lengthened.

CSRD concordance:

ESRS E3 - Water and marine resources & ESRS E5 - Resource use and circular economy

ESRS E5 Sub-topics: Resources inflows, including resources use - Resource outflows related to products and services - Waste

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Natural Resources Consumption and Waste Management

2023

For the first time, Criteo was able to assess the data centers' total water usage, which amounted to

65.5 million L

This information was either directly provided by the data centers or had to be estimated when it was not available, using the industry average value for the Water Usage Effectiveness (WUE) multiplied by the annual power consumption of the corresponding data centers. The calculation made effectively uses the least favorable hypotheses for water consumption, and the actual data center water usage might be lower than the figure provided; Criteo will endeavor in future years to collect more accurate data for this information.

In offices, Criteo's main direct use of natural resources besides energy relates to paper and water. Regarding water, Criteo implemented sustainable practices in most offices by using sensor-equipped faucets and two-level flushing toilets. Criteo also promotes a paperless work environment, using digital signature or digital collaboration tools, for example. Offices also sort and recycle waste whenever possible, and labels recycling bins with clear sorting signs. In 2023, we also replaced all disposable cups with mugs in the Paris, Berlin, Limassol, and Yerevan offices.



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Natural Resources Consumption and Waste Management

E-waste Management

Data Centers

To reduce the amount of e-waste³² generated in the data centers, Criteo is asking for a guaranteed extension for servers from five to six years.

Criteo works with a subcontractor to handle decommissioned equipment. Most 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. Globally, the amount of assets resold is 77%. For example, in the case of the new data center in Singapore, Criteo used equipment from other locations which amounted to 69% of the total amount of servers needed for the site opening.

In 2023, 79.4 tons of assets related to infrastructure activities were decommissioned, compared to 55.2 tons in 2022. In 2023, Criteo produced 5.8 tons of e-waste, compared to 2.5 tons in 2022 and 9.0 tons in 2021, due to infrastructure activities. The increase between 2022 and 2023 is explained by the decommissioning of two data centers in 2023.

Information Technology (IT)

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

2023

As a result, **Criteo's actions allowed for the refurbishment of 1,806 kgs and the recycling of 1,078 kgs of office e-waste.**

Criteo has implemented a replacement policy which allows a change of equipment every 3 years. However, we have decided that equipment changes will no longer be automatic and will be initiated in accordance with an employee request. We use the software "Service now" as an inventory tool that makes available all the information on the machine, notably operating time. Our team is working on bringing more transparency to the catalog listing all the machines that can be ordered by the employees. In 2024, the goal is to include in the catalog the carbon footprint and the reparability index of the user's devices available for the employees to order.

³² Electronic waste, or commonly called "e-waste", describes discarded electrical components or electronic devices.

Social

CSRD concordance:
ESRS S1 - Own workforce - Sub-topic: Working conditions



Supporting People Development and Talent Initiatives

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Headcount

Criteo operates in all corners of the globe and has 40 offices³³ across the Americas, Europe, Middle East, and Africa (EMEA) as well as Asia Pacific (APAC). Over the last years, we have focused on the development of our talent, which means investing in the growth and development of our current 3,610 employees to support our transformation.



This figure includes Criteo's active employees on December 31, 2023 (permanent and non-permanent employees). Compared with the 3,335 employees at the end of December 2022, Criteo's workforce has grown by 7,6% in 2023, mainly due to the Iponweb acquisition.

The workforce-related figures presented in this Report refer to all entities within Criteo as of December 31, 2023, including legal entities acquired in the previous years.

³³Offices, including coworking spaces: (19) EMEA - Paris, Grenoble (Echirolles), Bordeaux, Barcelona, London, Munich, Düsseldorf, Milan, Amsterdam, Madrid, Istanbul, Dubai, Stockholm, Moscow, Limassol, Yerevan, Berlin, Nicosia, and Tel-Aviv (8) APAC - Gurgaon, Tokyo, Osaka, Singapore, Seoul, Beijing, Melbourne, and Sydney (13) Americas - New York, Boston, Ann Arbor, Los Angeles, Chicago, Miami, Seattle, San Francisco, Portland, Palo Alto, Sao Paulo, Toronto, and Vancouver. Please note that one office can be occupied by several legal entities within Criteo (Criteo France SAS, Iponweb.). This list is based on the data provided by our Workplace teams as of December 31st, 2023. ³⁴This figure differs from the total headcount KPI presented in our Annual Report on Form 10-K because in this Report we do take into account "inactive" employees (41 employees) whereas inactive employees are excluded of the Annual Report on Form 10-K KPI. See the Methodological note at the end of this Report).

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CRITEO ENTITY	2022 (N-1) ³⁵				2023 (N)				VAR.
	WOMEN	MEN	NOT DECLARED	TOTAL	WOMEN	MEN	NOT DECLARED	TOTAL	
APAC									
Criteo KK (Japan)	67	75	0	142	60	60	0	120	-1.4%
Criteo Singapore Pte. Ltd. (Singapore)	45	26	0	71	37	20	0	57	-19.7%
Criteo India Pvt Ltd. (India)	46	101	0	147	72	140	0	212	+44.2%
Criteo Korea Ltd. (South Korea)	32	30	0	62	30	29	0	59	-4.8%
Criteo Australia Pty Ltd (Australia)	N/A	N/A	N/A	N/A	10	25	0	35	N/A
Criteo Advertising (Beijing) Co., Ltd (China)	N/A	N/A	N/A	N/A	9	5	0	14	N/A
AMERICAS									
Criteo Corp. (United States)	366	408	2	776	333	358	2	693	-10.7%
Criteo do Brazil LTDA (Brazil)	35	43	0	78	39	40	0	70	+1.3%
Criteo Canada Corp (Canada)	N/A	N/A	N/A	N/A	10	25	0	35	N/A
EMEA									
Criteo Europa S.L. (Spain)	312	295	1	608	304	292	4	600	-1.3%
Criteo Ltd (UK)	45	51	0	96	38	43	0	81	-15.6%
Criteo GmbH (Germany)	51	43	0	94	47	38	0	85	-9.6%
Criteo France SAS (France)	31	23	0	54	27	24	0	51	-5.6%
Criteo Technology (France)	305	680	0	985	288	635	1	924	-6.2%
Criteo SA (France)	N/A	N/A	N/A	N/A	15	9	0	24	N/A
Criteo S.R.L (Italy)	N/A	N/A	N/A	N/A	9	15	0	24	N/A
Criteo BV (Netherlands)	N/A	N/A	N/A	N/A	6	13	0	19	N/A
Criteo España S.L. (Spain)	N/A	N/A	N/A	N/A	6	10	0	16	N/A
Criteo Rek Hiz ve Tic. AŞ (Turkey)	N/A	N/A	N/A	N/A	6	5	0	11	N/A
Criteo MEA FZ LLC (UAE)	N/A	N/A	N/A	N/A	3	3	0	6	N/A
Criteo Nordics AB (Sweden)	N/A	N/A	N/A	N/A	0	3	0	3	N/A
ООО "КРИТЕО" [LLC CRITEO] (Russia)	N/A	N/A	N/A	N/A	0	1	0	1	N/A
Iponweb (Armenia; Germany; UK; USA; Cyprus)	N/A	N/A	N/A	N/A	119	304	5	428	N/A
Mabaya (Doobe In Site LTD) (Israel)	N/A	N/A	N/A	N/A	12	21	0	33	N/A
Total	1,335	1,775	3	3,113	1,480	2,118	12	3,610	+15.9%

³⁵ Change of reporting scope between 2022 and 2023: the figures in 2023 have been calculated for all entities within Criteo regardless of the number of employees whereas the figures in 2022 were calculated for entities with at least 50 employees. For 2022 figures figuring as "N/A", they correspond to data that was not reported in the 2022 CSR Report.

Headcount

Recruitment & Terminations

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Safety & Well-being at Work

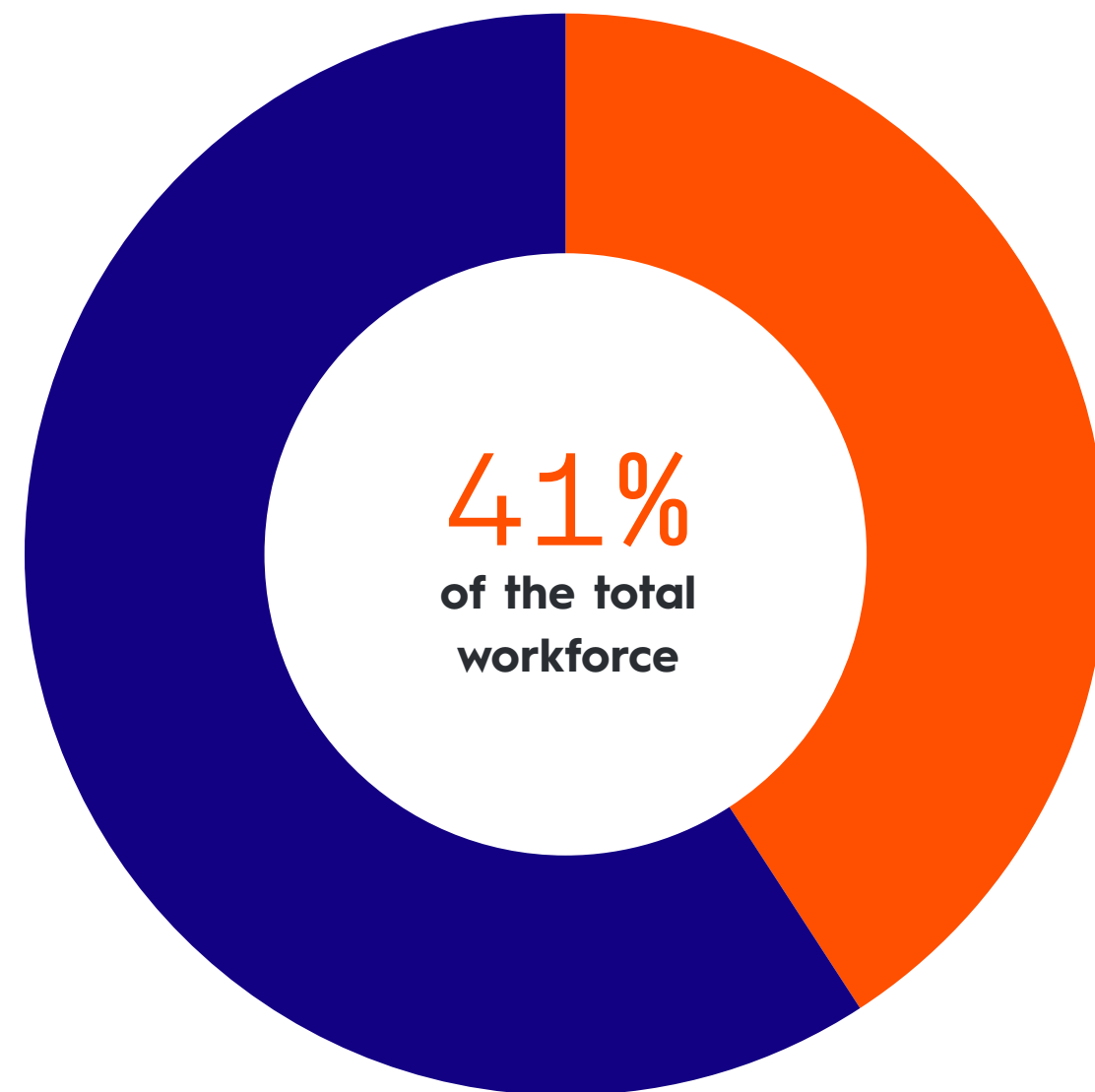
Skills Management & Development

Criteo Cares Program

Headcount

As of December 31, 2023, the **1,480 women in our headcount represented 41% of the total workforce of 3,610 employees.** Young people (below 35 years old) account for most of Criteo’s employees, which is expected in a high-tech company relying on a workforce with skills in the latest trending technologies.

WOMEN REPRESENTED



WORKFORCE BREAKDOWN BY AGE	2022(N-1)	2023(N)	VAR.
Under 25	142	133	-6.3%
Between 25 and 29	824	834	+1.2%
Between 30 and 34	938	1091	+16.3%
Between 35 and 39	629	791	+25.8%
Between 40 and 44	316	414	+31%
Between 45 and 49	163	207	+27%
50 and above	101	140	+12.9%
Total	3,113	3,610	+9%

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Recruitment and Terminations

Attracting top talent is key at Criteo, and we place great importance on the quality of our candidate experience. Our company's values "**Open, Together, and Impactful**" drive the efforts of our People team to attract and retain the best talents at Criteo.

Our **Employer Value Proposition** is at the very core of the [Criteo Culture Book](#). Based on the feedback from Criteo's employees and leaders, this book describes what makes our company special for clients, partners, and future talents.

Having a Research and Development (R&D) team made up of the best talent has always been a major challenge and a high business priority for Criteo. For this reason, R&D recruitment is entrusted to a **specific R&D Talent Acquisition (TA) Team** that is working on researching, connecting, and attracting job candidates to convert individuals into job applicants. The R&D TA team partners closely with the Tech Hiring Guild³⁶, whose purpose is to continually evaluate and ensure a robust process for the assessment of technical skills as part of the hiring process. The R&D team identifies and attracts candidates before they graduate through our Campus program. In 2023, this program resulted in the recruitment of 57 interns and apprentices in the R&D, and Product Teams.

³⁶The Tech Hiring Guild is an internal group which consists of Engineers and Talent Acquisition experts. This group meets every two weeks to challenge and continuously improve the recruiting process. Whether it's about the process flow, renewing coding exercises, improving the candidate experience, etc.



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Recruitment and Terminations

In 2023, Criteo partnered with 9 schools³⁷ in France and participated in 9 career forums. Those events allow us to promote our activities directly to students, meet with candidates, collect resumes, and organize future interviews. Two Campus Program specialists were hired in 2022 to focus on this topic.

We closely **monitor our attrition rate** and put in a strong effort to better understand it. For instance, we have built a database to analyze the reasons for departures and better predict attrition rates depending on geographic areas and populations.

We make every effort to retain our employees by regularly monitoring their engagement rate and ensuring that they enjoy a flexible working environment that allows for their well-being, inclusion, and development (see in the following sections).

NEW HIRES & TERMINATIONS	2022 (N-1)	2023 (N)	VAR.
New Hires	986	638	-35.3%
Terminations	548	768	+40.1%
Employee's initiative	327	374	+14.4%
Employer's initiative ³⁸	93	246	+164.5%
Other (e.g., end of fixed-term contract)	128	148	+15.6%

³⁷EPITA, Polytechnique, ENSIMAG, Centrale Supélec, Grenoble UGA, EM Lyon, HEC, ESSEC, and Toulouse Business School. ³⁸Including redundancies and restructuration.

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Compensation and Benefits

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

Criteo set up **Global Compensation Guidelines** to ensure that compensation offered is competitive depending on several criteria, including jobs and expertise levels, and geographical areas. This is enforced by Criteo's Compensation & Benefits team, who monitors the market and performs salary surveys for all components of employees' compensation. A yearly review of salary levels is conducted across the Company, ensuring that compensation abides by the Global Compensation Guidelines. The Compensation and Benefits team also oversees practices across Criteo's entities, considering country-level specificities with the help of local People teams.

2023

Annual base and variable salary compensation payouts were

€347,241,179.55³⁹

We monitor any potential salary gaps across populations depending on gender, age, or location, while considering local practices according to job category and experience. Every year, a **comprehensive analysis of salary levels across Criteo is undertaken**. 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 to improve our understanding of the potential residual differences in salaries between men and women.

³⁹ For all Criteo entities.

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Compensation and Benefits

Each year, Criteo conducts an annual corrective measure to bridge the gap between employee's alignment within teams (woman vs. man, new joiners vs. tenured employees, or any other type of discrepancies that could be noticed). This measure designed to support the Pay Parity Action Plan was conducted successfully in 2023: **The gender pay gap has been reduced to 0% in 2021 and maintained in 2022, and 2023 (average compa-ratio of 0.90% for men and 0.90% for women before calibration).**

The Pay Parity Action Plan is however a long-term endeavor, as it goes beyond short-term measures and intends to solve the issue permanently. Criteo remains very mindful about potential pitfalls that could trigger a salary gap between women and men again in the future, such as top management recruitments or insufficient levels of wage verification and monitoring.

The purview of our **Pay Parity Action Plan is comprised of the following areas:**

AT HIRING	AT MERIT CYCLE	AT PROMOTION & MOBILITY	AFTER A LEAVE OF ABSENCE
<ul style="list-style-type: none"> Ensure pay equity by running quarterly analysis on New Hire offers per gender Training for managers 	<ul style="list-style-type: none"> Ensure balanced performance rating distribution per gender Ensure average increase is balanced between women and men employees based on performance 	<ul style="list-style-type: none"> Ensure equal access to promotion and internal mobility opportunities Perform analysis on average increase proposed during promotion based on gender 	<ul style="list-style-type: none"> Ensure compensation analysis conducted upon return of leave of absence Specific to maternity - ensure employees on maternity leave receive an increase as any other employees during cycles Offer a career discussion when employees return from leave

93
/100

As per French regulations, we disclosed our **Women-Men Equality Index for France** again in 2023 (which reached 93 out of 100). We also disclose a **breakdown of Criteo's Named Executive Officers' compensation**, which is available in the company's [Proxy Statement here](#).

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Compensation and Benefits

In addition to compensation, **employee benefits are also a pivotal point** in the very competitive Tech industry and a key component for talent recruitment. Some of the major topics addressed by the Compensation & Benefits roadmap are in line with Criteo's Diversity, Equity, and Inclusion (DEI), and Safety & Well-being strategies available in the "Social - Safety and Well-being at Work" section of this Report (e.g., the Carrot Fertility & Family Forming Program).

For instance, we launched an expanded commuter offer in France, increasing flexibility for how employees can use their transport benefit to better align with Criteo's flexible "work from home" policy and support sustainable travel, by allowing reimbursement for other modes of transportation such as bikes and ride share.

At every insurance or program renewal, we assess market competitiveness and subsequently propose enhancements. For instance in 2023, Criteo increased coverage level of life and accident insurance in Canada, increased benefit limits and added health checkups in Turkey, and strengthened the medical plan in the U.S. by adding enhanced transgender coverage, hearing aids, bariatric surgery, and a travel benefit for services that are limited in locations where employees live.

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Safety and Well-being at Work

Adapting to New Ways of Working

Following the working policy established in 2020 and subsequent employee feedback, Criteo's **Flexible Work Approach** was launched in 2022. Aligned with our values of being Open, Together, and Impactful, this approach is based on trust and lets employees choose to work from home, work from an office, or do a mix of both – with some exceptions for employees whose on-site presence is deemed essential (e.g., IT, workplace safety).

In 2022, we created a **flexible working steering committee**. The governance structure of the committee was reviewed, and members continue to work on various projects such as improving the Flexible Work Approach, Employee Engagement, social events strategy, etc.

Criteo also partners with an external company to provide 24/7 free⁴⁰ psychological support to all employees and their families and provides financial support for each employee to buy suitable remote working equipment (screens, ergonomic chairs, desks, etc.). We continue to keep every first Friday of the month meeting-free ("**Quiet Fridays**") to allow time for focus, self-development, reflection, and learning. We also provide learning resources to all employees to support healthy and effective working habits in a flexible work environment, including recommendations for successful hybrid work, safety tips for working from home, guidelines for effective virtual meetings, and many resources to support everyone's balance through breaks and disconnection.

⁴⁰The 24/7 helpline is always available for free with no limit for immediate support. There are limits though when it comes to an actual one-to-one therapy session. In this case employees can get up to 6 sessions with a specialist to work on stress reduction programs, up to 5 sessions with a counselor and up to 3 sessions with a professional life coach.



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Safety and Well-being at Work

Promoting Employee Well-being

At Criteo, we are committed to creating a positive work environment and believe that well-being at work ultimately results from a wide array of initiatives, such as the Flexible Work Approach mentioned above our Diversity, Equity, and Inclusion (DEI) commitments. Aside from those, many initiatives have been launched and implemented throughout the year.

For instance, we regularly ask employees to provide feedback on their well-being, work-life balance, and workload through a questionnaire, and to have a follow-up one-to-one conversation with their manager to discuss their well-being at work and agree on actions if needed. In 2023, our annual Well-being Check-In campaigns were conducted worldwide during Q2.

Unlike the engagement survey, the feedback and the conversations are not anonymous and allow for personalized follow-up. This process is not mandatory, although Criteo highly encourages all employees to participate. In 2023, 57% of employees provided their feedback through the questionnaire, and 86% of them said their workload allowed them to have a fair work-life-balance. To help managers carry out those conversations about well-being, specific toolkits and materials were designed in 2023. These elements are accessible to all employees globally. Two webinars were also organized in 2023 on the “Art of the Check-In” and on “Psychological Safety”.

Employees can also request a dedicated conversation with their **People Business Partner** to address additional feedback or discuss any concerns. Through this initiative, Criteo voluntarily extends the company’s response to a French regulatory expectation to all employees worldwide.

In addition, Criteo rolled out several initiatives to raise awareness about mental health and create a safe space for employees to raise mental health concerns, such as our **“Mental Health Awareness Weeks” in October 2023**, organized by the Criterable Community (see “Social - People with Disabilities” section of this Report).

As a first measure, Criteo continues to provide an **Employee Assistance Program** across all countries. This is a free and confidential external helpline service that can be reached 24/7 for support on various issues. In all countries, employees can benefit from free counseling sessions offered by an external provider and available in local languages. The program also helps with daily life matters, such as sourcing services like child and elder care, or legal and financial services.

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Safety and Well-being at Work

In addition to this external support, in 2022, Criteo introduced an internal support network of Mental Health First Aiders composed of Criteo's employees who have completed a training course to learn more about the most common mental health issues, understand how to identify mental health issues, and learn how to conduct non-judgmental conversations. They can act as a first point of contact for colleagues who are struggling with their mental health or going through a crisis and can signpost them to professional support if needed. A total of 74 employees globally have received their certification, and we plan to grow this support network to 100+ Mental Health First Aiders in 2024. To give every employee the opportunity to proactively support their well-being and learn healthy working habits, we also offer well-being-related training through our training catalog including topics like mindfulness, resilience, or stress management.

Every Criteo employee and two friends or family members can freely access the **Headspace application**. This offer is used by more than **1,400 enrolled members**. Headspace offers content around mindfulness, meditation, workouts, sleep, nutrition, and much more. Employees mostly use this service for meditation and support for better sleep and, on average, they engage five times per month with the app.

In addition, most offices provide standing desks to employees without requiring a medical prescription or specific ergonomic seating, which requires a medical prescription. Based on individual needs, these appliances enhance overall comfort in the workspace.



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Safety and Well-being at Work

Safety at Work

Criteo's **Health & Safety Management System** (H&S MS) has been in place on a global scale since 2021, with the aim to establish a global standard across the company in terms of safety norms in offices (e.g., fire protection). This H&S management system retains the strictest criteria as the company's standard depending on local norms and practices in each country. Each workplace also named an **H&S referent** who received specific training regarding their roles and responsibilities. Criteo uses an **H&S Management System Tool**, a platform that stores all H&S related documentation and data managed by Criteo's H&S referents.

The H&S Team issued two **policies** that are presented in [last year's Report here](#).

The safety of employees travelling for business is another important issue. Criteo relies on an **International SOS Assistance tool** to complement the existing employee emergency assistance with our healthcare insurer. This tool acts as a 24/7 hotline for support on security issues, especially when travelling. It tracks all Criteo travelers so that they can be identified and Criteo can reach out to them in case of an emergency⁴¹.

CSRD concordance:
ESRS S1 - Own workforce - Sub-topic: Equal treatment and opportunities for all

⁴¹The International SOS Traveler Tracker website allows us to identify our employees who are in a risk area. Depending on the level of risk, either ISOS takes the initiative to contact the concerned employees by email/text/phone to ensure they are safe or Criteo can send personalized messages from the ISOS platform.

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Skills Management and Development

In the following section, the various types of learning and development solutions we provide are referred to as:



Instructor-led trainings

“Live trainings” and “virtual classrooms” where:

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



Online trainings

Trainings autonomously followed by employees through digital learning platforms.



Coaching sessions

1-to-1 sessions with a coach on well-being, professional development, leadership and maximizing strengths.



Headcount

Recruitment
& TerminationsCompensation
& BenefitsSafety &
Well-being at Work**Skills Management
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Program

Instructor-led Training 2023 Highlights

Top Talent Program “Leadership Journey”

The “**Leadership Journey**” is a six-month program tailored to individuals who are recognised as Criteo’s Top talents, focused on making them able to contribute to Criteo’s sustainable growth. The program’s objectives are to **build leadership capabilities**, accelerate business effectiveness and success, create development and growth opportunities, expand the Criteo community and network, and foster our culture, values and leadership behaviors. In 2023, 24 participants followed a full training program, including workshops, learning expeditions, e-learnings, and individual and group coaching.

Manager Development

Criteo continues to **expand the development program** which aims to support Criteo managers in building their Leadership Behaviors. The program includes two different tracks:

- **Future makers:** A six-month skills development journey, with the aim of developing Criteo’s Leadership Behaviors and creating new leadership habits. In 2023, 68 managers completed the program and 63 are currently enrolled. Participants have reported positive feedback on the relevance, usefulness, and impact of the program to their role as managers.
- **Managers’ Circle:** These groups allow connection, social learning, and sharing of best practices between managers. All managers are invited to join this group whether they are hired as a manager or promoted into a management role. In 2023, we relaunched the Managers’ Circle and discussed managing change, engagement, and well-being as important topics for Criteo managers.

Perform and Develop Webinars

Criteo’s approach to Perform & Develop helps employees and managers drive performance. The Learning and Development (L&D) team supported the Perform and Develop Cycle with “Just-in-time webinars” to promote timely information on our Perform & Develop process for all Criteo’s employees and managers. In 2023, 2,890 employees and 470 managers attended webinars that offered best practices on performance management, delivered in collaboration with business leaders who gave their top tips on managing performance.

Headcount

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Program

Instructor-led Training 2023 Highlights

Criteo Interviews

At Criteo, our goal is to attract and retain world-class talent, and we're committed to finding the right people for the right roles. In collaboration with Global Talent Acquisition team, we designed a new training program that will give hiring managers knowledge and skills to hire the best talents. The virtual workshop trains interviewers on how to conduct performance-based interviews, evaluate candidates, and make effective, fair, and inclusive hiring decisions.

Global Onboarding Live Sessions

Criteo revamped its Global Onboarding Program designed to enable a smooth and engaging transition for new Criteo's employees. During their first week at Criteo, newcomers participate in the Criteo Landing onboarding journey, which consists of two main components: live sessions and courses that are available on our learning platform, Learning Quest. Topics include general Criteo information on its business and strategy, IT open hour, HR induction, and life at Criteo.



Headcount

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Instructor-led Training 2023 Highlights

In-class Solution Based on Individual Development Plan (IDP)

Criteo provides employees with an extensive catalog of in-class training. This catalog is aligned with employees' individual development plans, and employees can freely enroll in the in-class training courses available in the catalog. In 2024, the catalog will be expanded with new e-learning, webinars, workshops, and coaching programs. The catalog will be updated quarterly.

Developing Team Strengths

In 2023, Criteo started using the "Clifton Strengths" tests developed by Gallup to help employees self-assess their strengths. Self-assessments are debriefed by a coach through a 1-hour coaching session, and the L&D team facilitates team sessions based on the team's collective strengths. These sessions aim to foster collaboration and help teams achieve their objectives by helping them use their strengths on a day-to-day basis. Up to this date, Criteo has facilitated in-person and virtual sessions for 17 teams and 155 employees.

Beyond formal training activities, much more is happening in the field on a day-to-day basis, ranging from Criteo's cross-functional teams and organizations to 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.

The satisfaction rate of instructor-led trainings is 4.6 out of 5.

In-class Training KPIs

IN-CLASS TRAINING	2022	2023	% EVOLUTION
Training hours	11,187	7,243	-35%
Average training hours per employee	4.5	1.7	-63%
Average training hours per trained employee	7.3	4.9	-32.9%
% of trained employees	62%	37%	-40.3%

Headcount

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Online Training 2023 Highlights

Criteo provides all employees with **four online training platforms**⁴² which provide access to over 100,000 training courses and allow free registration to workshops.

LEARNING QUEST

In 2023, Criteo also continued to deploy a **Learning Management System** (LMS) internally called “**Learning Quest**”. This platform allows for more flexibility in the creation and management of content, thus limiting the outsourcing of the creation process and allowing it to adapt in real-time to employees’ training needs. A key benefit of Learning Quest is that most training workshops and events are registered there, offering a single-entry point for users, better reporting on training completion, and thus improved management of individual training paths.

The Management Performance Cycle is composed of two main highlights: the mid-year touchpoint and the end-of-year touchpoint. As part of the cycle, new e-learning courses were developed in 2023 with a special focus on how to operate processes internally. For instance, pieces of training on “how to give feedback” or “how to rate my employee performance” were offered in 2023. These e-learning courses have been completed by 30-min webinars during which representatives from different departments presented best practices on our Perform & Develop process.

As part of the Criteo Interviews Program, an e-learning program called Criteo Hires was developed to provide all managers, interviewers, and recruiters with knowledge on significant aspects of our hiring process, including our Diversity, Equity, and Inclusion (DEI) practices as well as recruitment compliance procedures.

To complement the Global Onboarding Live Sessions, we designed the “Welcome to Criteo” e-Learning program which aims to provide newcomers with essential knowledge and tools needed to excel in their role and become an integral part of the organization. The e-learning program provides access to a wide range of resources, including interactive modules, videos, and quizzes, coupled with the opportunity to reinforce their learnings in live virtual sessions. This guides new Criteo’s employees through our company’s culture, values, policies, and procedures, setting them up for a fulfilling and successful career journey.

⁴² Coursera, Speexx, LinkedIn Learning and Learning Quest.

Headcount

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Program

Online Training 2023 Highlights

Online Training KPIs

ONLINE TRAINING	2022	2023	% EVOLUTION
Training hours	23,641	22,487	-4.9%
Average training hours per employee	9.5	5.2	-45.3%
Average training hours per trained employee	7.6	7.8	-2.6%
% of trained employees	100%	72%	-28%

On top of the core online pieces of training above (skills development-driven), employees completed further online training that represents about 4,680 hours and covers topics such as Preventing Harassment in the Workplace (39% of these hours), "FlyCriteo" and "Welcome to Criteo" on-boarding modules (32%), Security for us (22%), and Code of Business Conduct & Ethics (7%).

A decrease in training hours per employee was expected for 2023, due to changes in the workforce (acquisitions, departures, etc.). In addition, the L&D team also focused on introducing coaching as a new methodology to help employees grow and develop.

Headcount

Recruitment
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Criteo's Coaching Offer

Coaching is a powerful tool to empower our employees to tap into their full potential and bring their whole selves to work, besides being a great tool to enable our business growth.

We developed different types of coaching offers to support every level's needs:

For Individual Contributors and Team Leads:



In 2023, Criteo relaunched the internal coaching program called "**CoachMe**", which allows the delivery of internal coaching sessions around career development, work-life balance, and professional efficiency topics. The goal of training 50 internal coaches has been successfully reached, and the program enabled 111 employees to be coached in 2023. In parallel, the program allows coaches to perform a self-assessment based on three areas: Career Growth, Professional Efficiency, and Work-Life Balance.

For Managers:



Part of the "**Future Makers**" program (see above). The coaching journey is delivered by BetterUp, one of the leaders in the coaching market. Participants have access to on-demand coaching with a flexible frequency according to their needs. The coaching sessions usually range from 45 minutes to 1 hour once or twice a month.

Coaching for Executive & Senior Leaders:

Through coaching delivered by **high-quality Executive Coaches**, Executive and Senior Leaders are supported in their development and leadership capacity. A new coaching program, developed via BetterUp, was implemented in November 2023 for senior directors and executive management.

In 2023, Criteo also offered strengths-based coaching for all using the CliftonStrengths tool.

Coaching Offer KPIs⁴³

COACHING OFFER	2023
Coaching hours	1,085.26
Average number of coaching hours per coached employee	3.03
% of coached employees	33%

⁴³ New KPI in 2023, no data is available for 2022.

Headcount

Recruitment & Terminations

Compensation & Benefits

Safety & Well-being at Work

Skills Management & Development

Criteo Cares Program

Hackathon

At Criteo, we foster innovation and different ways of thinking. Our **Hackathon** aims to foster innovation and cross-collaboration around the globe, and is one of the oldest and greatest traditions at Criteo. Every year, hundreds of employees get together for the opportunity to innovate, collaborate, get out of their comfort zone, learn new skills, and bring their ideas to life.

2023



Hackathon 2023 was a remarkable edition with

430

participants

13%

increase compared to 2022

The collaborative spirit led to the development of

70

innovative projects

spanning across

30

offices worldwide

Several sustainability and DEI oriented projects were submitted, and one of these projects, "Diversity Hiring", focused on creating a solution to help hiring managers write job descriptions and avoid non-inclusive language.

Headcount

Recruitment & Terminations

Compensation & Benefits

Safety & Well-being at Work

Skills Management & Development








Criteo Cares Program

Presentation of the Criteo Cares Program

Criteo's CSR approach is composed of two bodies: the strategic branch led by the Diversity, Equity, and Inclusion (DEI) and Sustainability teams, and the employee engagement branch called Criteo Cares. This program, mentioned in several sections of this Report, was created in 2018 to bring together all local initiatives, coordinate existing solidarity and sustainability actions across the company, and maximize their impact.



Criteo Cares Program projects are **driven by seven community groups**⁴⁴:

 Women at Criteo	 Criterable Community	 Education Community
 Pride Community	 Parents Community	
 BIPOC Community	 Green Community	

These community groups are led by **active volunteers** from various teams and different geographical areas. Comprised of hundreds of employees from around the world, each Community group has its own Leadership Sponsor at the executive level, a dedicated internal website, and an annual roadmap.

More information can be found regarding the actions undertaken by each Criteo Cares community in related sections throughout this Report.

⁴⁴Also known as ERGs "Employee Resource Groups".

Headcount

Recruitment & Terminations

Compensation & Benefits

Safety & Well-being at Work

Skills Management & Development

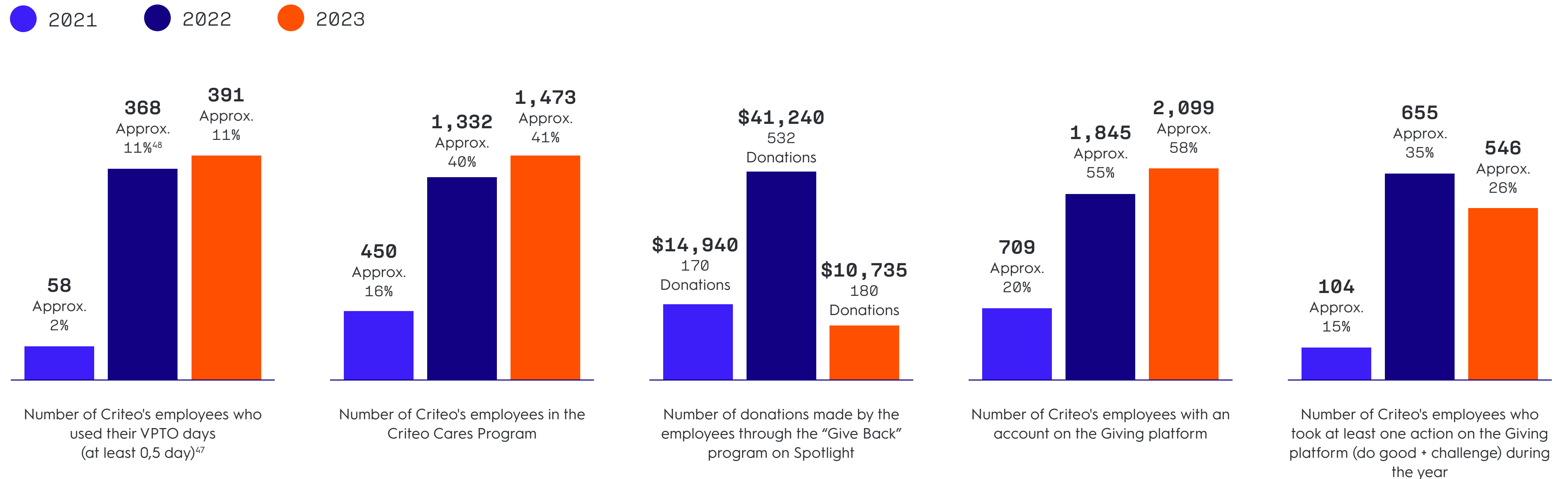
Criteo Cares Program

Presentation of the Criteo Cares Program

Through **our volunteering and giving platform**, launched in 2021 and called "Giving by Alaya/Benevity⁴⁵", Criteo's employees can support causes that are meaningful to them. This platform includes a wide variety of non-profit organizations to give our employees the freedom to use their two VPTO⁴⁶ days. To encourage employee engagement, Criteo rolled out **daily challenges** for employees on the platform. Criteo hopes that the GIVING platform will become an increasingly important part of employee engagement.



CRITEO CARES PROGRAM KPIS



⁴⁵The Alaya platform (our vendor) was acquired by Benevity in 2022. ⁴⁶Volunteer Paid Time Off (VPTO). ⁴⁷Criteo provides all employees with a maximum of 2 working days per year to participate in volunteering activities with local charities. ⁴⁸We have updated this 2022 figure in the current report because we noticed an error in the calculation. In 2022, 368 employees used at least 0.5 VPTO days.

Headcount

Recruitment
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Presentation of the Criteo Cares Program

Given the success of VPTO days, and with a view to further structure the approach, we decided to take inspiration from a best practice already in place in Iponweb by creating a **giving committee**. This committee will be in charge of developing actions linked to donations and volunteering throughout the year, in synergy with the Criteo Cares communities, the DEI and Sustainability teams.

In response to employee demands in 2023, we also rolled out our first **Impact Weeks**, a two-week global volunteering opportunity for our employees.

2023

Over these two weeks, approximately **400 employees** volunteered with local non-profit organizations on a broad range of topics, such as environmental issues, education, food insecurity, disabilities, blood donation, and animal welfare in **23 locations**.

Those weeks offered our employees the chance to take their VPTO days and do good while getting together as a team.

In line with our volunteering program, we believe that we must give back to society. Through our global talent, we have a variety of expertise and skill sets that are recognized as among the best in our industry. Therefore, our “education” initiative is rooted in several partnerships with non-profits supporting various communities via mentorship. Our employees are thus able to become mentors to young people, refugees, people experiencing professional reintegration, and more.

More information is available in the following sections “Well-being, Inclusion, and Diversity at Work”, “Sustainable Relationship with Stakeholders”, and “Governance”.



Employee Relations, Inclusion, and Diversity at Work

Employee Relations

Diversity, Inclusion, and Equal Opportunities

Gender Equality, LGBTQIA+ Community & Parenthood

Social Diversity

People with Disabilities, BIPOC Community, Non-discrimination & Prevention of Harassment

Employee Relations

Internal Communication

Twice a quarter, Criteo hosts **“Global All Hands”** which are webinar-style meetings that give the Leadership Team a platform to share the strategy and other important information with employees all over the world. As a publicly listed company, we also run specific **“Earnings”** sessions each quarter to cover Criteo’s financial results with employees. These meetings provide key business updates and allow employees to ask questions. Additionally, each team has regular functional **“All Hands”** to cascade further information on key business priorities and performance metrics.

This year, we’ve launched an **“LT Engagement”** program that serves as a platform to unpack Criteo strategic plans, topics, and objectives via simple conversations with our Leadership Team over video.



Employee Relations

Diversity, Inclusion, and Equal Opportunities

Gender Equality, LGBTQIA+ Community & Parenthood

Social Diversity

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Employee Relations

Culture of Feedback and Engagement

At Criteo, we promote feedback as an important part of our company culture. The People team supports managers and employees through **dedicated trainings to give and receive feedback in a constructive way**. The **biannual performance review process includes additional feedback conversations** between managers and employees, as well as a mid-year touchpoint for all employees.

We also collect feedback on the employee experience, including onboarding and exit feedback surveys to get a good understanding of the onboarding experience and the reasons why people leave the company. In some cases, face-to-face exit interviews with employees who leave voluntarily are also used to pinpoint the main causes of turnover and better address potential issues. We learned that we have opportunities to focus on total rewards and missing career opportunities, which were cited as the main reasons for people to leave Criteo, and this is driving our continued focus to improve employee retention.

Criteo also regularly runs **company-wide employee surveys to measure engagement** over time. “Criteo VOICES” is our recurring employee listening program that allows us to measure employees’ engagement and understand where we need to focus our attention to drive our business and our culture forward. In both surveys, we measure employee engagement by asking five questions:

- 1 **Would I recommend Criteo as a great place to work?**
- 2 **Does Criteo motivate me to go beyond what I would in a similar role elsewhere?**
- 3 **Am I proud to work for Criteo?**
- 4 **Do I rarely think about looking for a job at another company?**
- 5 **Do I see myself still working at Criteo in two years' time?**

Employee Relations

Diversity, Inclusion, and Equal Opportunities

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Employee Relations

Following surveys, we ran five sessions with all Criteo managers, focusing on Strengthening Team Engagement.

The main strengths identified through both surveys were the following:

- **Managers of Teams** – Respondents feel Criteo demonstrates genuine care for well-being, listens to feedback, and keeps employees informed.
- **Our Inclusive Culture** – Respondents feel that their opinions are valued, and we are doing a good job at supporting and promoting DEI.

The full engagement survey also reviews scores and feedback from several questions, and more than 2,600 qualitative comments left by employees. Additionally, we hosted 15 after-survey workshops with approximately 10% of the population to get more insights and feedback from employees regarding engagement, leadership, and culture.

Results are reviewed at different levels of the organization, and all managers have immediate access to their team's feedback. They are encouraged to have open conversations with their teams about strengths and areas of improvement. Results are also reviewed by the People team and the Leadership team, at the team and organization level. At the company level, results and continued focus areas were communicated to employees through written communication and at the Global All Hands meetings.



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Employee Relations

In 2023, we renewed our **managers' effectiveness survey**. This survey is an opportunity for Criteo's employees to provide their direct manager with insights on the areas in which they feel well supported, as well as the opportunities that will help them grow. The survey is based on the six new Criteo Leadership Behaviors (see Our Culture and Values in "Introduction - Culture and Values" section of this Report). Based on the results, managers can identify improvement areas, and get access to a detailed report of the feedback provided by their team. They are encouraged to use the survey feedback as input to set their development goals as part of the Performance Review Process.

In 2023, Criteo introduced the "Criteo Adventure Global Onboarding Program" to enhance new team members' experience. With the aim to create a seamless and impactful experience for each new hire, this program provides newcomers with the essential knowledge and resources needed to excel at Criteo. The overall onboarding journey includes 3 levels:

- **Global Level (Criteo Landing):** Providing all employees globally with consistent experience and resources.
- **Local Level (Criteo Explorers):** Allowing employees to learn more about their office locations, understand their local employee benefits, and ask questions specific to the country/location they work in.
- **Role Level (Criteo Role Trek):** Giving employees access to a role and function-specific onboarding within their teams or divisions.

The Criteo Adventure Global Onboarding Program is designed to provide long-term support as the overall process lasts a total of six months from the pre-onboarding actions to the completion of the mid-year touchpoint. Dedicated surveys are also a key element to ensure the quality of the onboarding experience.

CRITEO Spotlight

Employee Recognition

"Spotlight" is Criteo's global recognition program, available for all employees. This platform launched in 2019 with the objective to reward every small or big thing employees are doing at Criteo.

Some rewards include social recognitions to applaud everyday great contributions, point-based recognitions to reward achievements performed during a month, and quarterly Standing Ovarions to reward outstanding achievements. The platform also allows employees to recognize great actions performed through the Criteo Cares program or even to celebrate employees' milestones within Criteo (hiring, promotions, return from long-term leave, Criteo anniversaries, etc.).

Criteo's Strategy for Diversity, Equity, and Inclusion

Diversity, Equity, and Inclusion (DEI) are at the heart of Criteo's values. While this commitment is embodied by all employees, Criteo's dedicated **DEI team** is responsible for spreading a day-to-day DEI culture, developing a strong DNA within Criteo, and being the link between employees' community groups⁴⁹ and the Leadership Team.

Our DEI team is spread across different regions and works closely together. This organization reinforces our efforts to ensure that DEI remains a priority throughout all our locations.

Established in 2021, our DEI strategy is communicated in [Criteo's Global DEI Vision and Commitments](#)⁵⁰, [Criteo's DEI Policy](#), and Criteo's **Inclusion Index** (see hereafter) – among other major initiatives.

Today our priorities are:



Strengthen our culture of inclusion (and maintain our Inclusion Index high score) through Learning programs, Workshops and Leadership Engagement.



Increase our efforts to support the attraction and retention of diverse talent (women in Tech roles, disability inclusion, underrepresented minorities in the US).



Strengthen our commitments through engagement and programs via Criteo Cares and community groups roadmap delivery.



Maintain full pay equity across Criteo globally.

The main crosscutting elements of Criteo's DEI strategy are focused on developing Inclusive Hiring Programs and Practices (Open Path Program, Criteo Hires, Voluntary Disclosure Form), retaining our diverse talent via sponsorship programs (Women in Tech Roadmap, Empower U Program) and strengthening our inclusive Culture via the Preventing Harassment Training, the Disability Inclusion Roadmap, our Criteo Cares Communities Roadmap and measuring the sense of inclusion internally via the Inclusion Index.

The following sections offer a more detailed vision of Criteo's policies, commitments, and actions toward **Gender Equality**, the **LGBTQIA+ community**, all types of **Families, Social diversity, People with disabilities**, and **BIPOC communities** – as well as a focus on general **non-discrimination** procedures and measures.

⁴⁹ Employee Resource Groups. ⁵⁰ More details on [Criteo's website here](#).

DEI Objectives 2023

Diversity:

Representation of varied identities and differences, collectively and as individuals.

Equity:

Fair treatment, access, opportunity, and advancement for everyone at Criteo.

Inclusion:

The sense of belonging and value that is felt throughout Criteo.

Focusing on Hiring Programs

- ✓ Increasing Women in Tech roles⁵¹ by 26% by 2030.
- ✓ Increasing under-representation in the US.
- ✓ Supporting inclusive hiring practices (disability, inclusion, inclusive hiring training).

Developing and Retaining Diverse Talent

- ✓ Career development and sponsorship for under-represented groups.
- ✓ Global mentoring program.

Strengthening our Inclusive Culture

- ✓ Maintaining our very high Inclusion Index.
- ✓ Preventing harassment training.
- ✓ Engaging Employees in the Criteo Cares program.

⁵¹ Women in Tech roles includes women in R&D, Internal IT, Products, Analytics, RTB-Tam (Real Time Bidding-Tam, Global Supply and Business Development), S&O Developers (Global Automation Development), Technical Onboarding, and Technical Solutions- Client Focus & and Technical Solutions- Solution Focus.

Our Diverse Representation

Global Inclusion Index:

79%

Very High⁵²

In 2021, Criteo established its first **Inclusion Index**, focusing on assessing our culture of belonging, authenticity, psychological safety, and inclusive leadership. Our Inclusion Score was reassessed in June 2023, revealing a score of 79 /100. The 2023 Inclusion Index survey was completed by 80% of eligible employees, excluding individuals who had joined Criteo less than 2 months prior.

DEI Survey

A deeper **DEI study was conducted in 2022** with the help of a specialized provider, voluntary and anonymous, with specific self-identification questions to help us further evaluate our workforce and inclusive culture. The 2022 survey supported the cultural findings from our Inclusion Index and gave us deeper insights into topics of fair management, career development, workplace flexibility, workplace safety, and recruiting and hiring.

While the survey was not repeated in 2023, our focus for the year was dedicated to sustaining and enhancing the outcomes achieved in the 2022 survey.

Actions from survey insights:

CAREER DEVELOPMENT	FAIR MANAGEMENT	WORKPLACE SAFETY
<ul style="list-style-type: none"> Clarity around internal career paths Promotion of internal career vacancies and voyager (short term assignments) Mentoring Program Pilot CoachMe Program 	<ul style="list-style-type: none"> Communication and clarification of Promotion Guidelines Launch of Future Makers Program (Manager Training) 	<ul style="list-style-type: none"> Mandatory e-learnings (Preventing Harassment and Code of Business Conduct & Ethics) Reinforcing internal guidelines to raise a concern or a complaint Mental Health First Aid Accreditation

In 2023, a **“Voluntary Disclosure Form”** was also integrated to our application process. The applicants are now able to transmit several socio-geographical information (age, gender, etc.). This form is not mandatory and complies with the laws of every country we operate in. For instance, the race and ethnicity information are only included in the form for UK and US applicants where the legislation allows it. This initiative will provide a better overview of how inclusive our current recruitment process truly is.

⁵² Global Inclusion Index: Measured through our Voices Survey based on four questions focusing on: Authenticity, Belonging, Psychological Safety, and inclusive leadership. Benchmarked externally against global organizations.

Our Diverse Representation

DEI Learning Paths

DEI Learning Paths were developed in 2021. These online training courses, available to all employees, aim at strengthening employees' commitment by providing them with a wealth of knowledge on DEI topics. In 2022, training materials related to Criteo's **new Anti-harassment and Discrimination policy** were also offered as part of our DEI Learning Paths. All employees globally thus completed a mandatory annual training with diverse topics (among which anti-harassment and discrimination – see the end of the section).

In 2023, the training was reinstated, integrating the Iponweb team into the program.

A special focus was put on living together and inclusive management in 2023, and a workshop on inclusive leadership was organized for the members of the R&D and Product Leadership Team.

Investing in New DEI Programs

Key DEI programs developed in 2022 and continued in 2023 include, among others:

- The **Open Path program** aims to create more open opportunities for students from underprivileged and/or atypical educational backgrounds (see “Social - Social Diversity” section of this Report).
- The **Pilot Mentoring Program** focuses on Career and Skills Development with a big focus made on Women in R&D (see below “Women-in-Tech network” section of this Report).

A series of **talks on diversity** was also held in APAC to bridge the gap on this subject in the region. The APAC teams were able to discover inspiring role models and share their experiences and challenges (e.g. being a woman in a man's environment, being a disabled worker).

Two cultural Intelligence Workshops for R&D and Finance teams were organized in collaboration with the external vendor aiming to foster cultural intelligence and understanding following the Iponweb integration.

Awards received by Criteo for its commitment to Diversity, Equity, and Inclusion (DEI) are listed in “CSR Approach - Awards and Recognitions” section of this Report.

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Social Diversity

People with
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Gender Equality at Criteo

Criteo's Gender Equality Commitments

Criteo set out clear commitments towards advancing gender parity and is proud to be driving meaningful change for women in Tech with, for instance, our commitment to sustain pay equity globally and our focus on improving career paths in technology for Women (see Criteo's priority KPIs and targets summary table in "CSR Approach - Key Results and Objectives" section of this Report).

In 2023, when building our DEI roadmap, we decided to work on a new definition for this KPI to include Women in Tech jobs from the following families: R&D, Internal IT, Products, Analytics, Real-Time Bidding-Tam (Global Supply and Business Development), S&O Developers (Global Automation Development), Technical Onboarding, and Technical Solutions- Client Focus & and Technical Solutions- Solution Focus (instead of R&D, internal IT and Product teams previously). With the new definition, the indicator now includes job families in Client Solutions.

We aim to have 20% of Women in Tech roles by 2024, and to increase by 1% every year from 2025 onwards to reach the worldwide average in 2030, which currently stands at 26%.

As a **signatory member of the Tech for Good⁵³ Call**, Criteo also made strong commitments to the improvement of women's representation in leadership positions specifically ([more information available here](#)).

Lastly, Criteo's **gender equality agreement in France** was renewed in 2021 for three years. This agreement promotes equal pay, diversity during recruitment processes, equal access to training, and equal opportunities for career development and promotions. Several targets⁵⁴ were established as part of this agreement, such as prohibiting unjustified pay differentials, increasing the number of promotions granted to women to 37% of the total amount of promotions, and increasing the proportion of women in all the different types of positions and pay ranges by 2% per year to reach 38% total representation of women in France within three years.

⁵³"Tech for Good" literally means "technology for good". This indicates a collective awareness that positive societal impact must be placed at the heart of tech and digital transformation. ⁵⁴The targets mentioned in this paragraph concern Criteo's French entities.

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Monitoring Gender Equality at all Levels of the Company

GENDER EQUALITY	TOTAL EMPLOYEES		MANAGERS		DIRECTORS AND VP (VICE PRESIDENT)	
	2022 (N-1)	2023 (N)	2022 (N-1)	2023 (N)	2022 (N-1)	2023 (N)
Men	1,775 (57%)	2,118 (59%)	387 (64%)	480 (67%)	173 (68%)	234 (70%)
Women	1,335 (43%)	1,480 (41%)	217 (36%)	239 (33%)	83 (32%)	102 (30%)
Not declared	3 (<1%)	12 (<1%)	1 (<1%)	2 (<1%)	0 (0%)	0 (0%)
Total	3,113	3,610	605	721	256	336

Employee Relations

Diversity, Inclusion, and Equal Opportunities

Gender Equality, LGBTQIA+ Community & Parenthood

Social Diversity

People with Disabilities, BIPOC Community, Non-discrimination & Prevention of Harassment

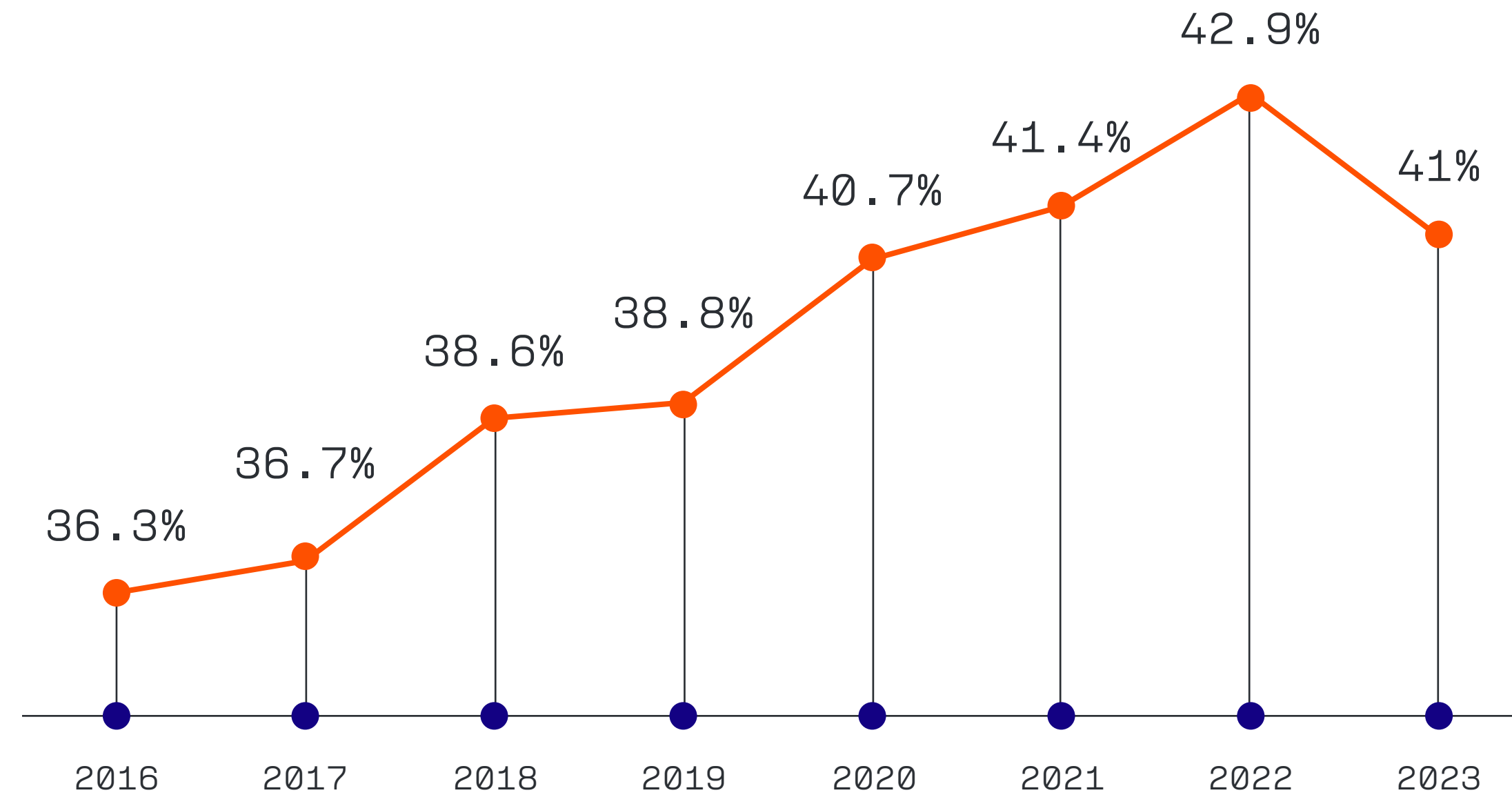
Monitoring Gender Equality at all Levels of the Company

Our long-term efforts to attract and retain women talents over the past seven years are demonstrating overall progress, as shown in the graph below:

The small decrease between 2022 and 2023 in the percentage of women is explained by the acquisitions made by Criteo (Iponweb).

Criteo aims to hire talent without gender discrimination and promote fair opportunity regardless of gender. In 2023, 42% of promoted employees were women, surpassing the overall representation of women in the company, which stands at 41%.

PERCENTAGE OF WOMEN AT CRITEO YEAR-TO-YEAR



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Key Programs and Partnerships Supporting Women in Tech Roles

Launched in 2022, Criteo's **Pilot Mentoring Program** proposes a focus on Career and Skills Development for targeted groups, women in R&D being one of the main areas of focus. In 2023 we set up the **Global Mentoring Program**, a 6-month internal Open Mentoring Program focusing on soft skills where mentors and mentees build an inspirational relationship based on mutual respect and trust, both mentors and mentees being Criteo's employees.

Ada Tech School is an inclusive and feminist computing school, accessible for all to learn how to create with coding in an open, caring environment. Criteo is in partnership with Ada Tech School and in 2022 we welcomed 3 women apprentices in our R&D teams, who successfully accomplished their apprenticeship in June 2023.



Events Promoting Gender Equality

- **Top Women Tech - Careers International:** in June 2023, Criteo participated for the second time in the Top Women Tech Summit by Careers International in Brussels. During this event, eighteen companies met with 120 high profiles tech talent open to career opportunities.
- **WomenTech Global Conference:** Criteo's SVP Talent Development and DEI, Rachel Scheel, hosted a talk at the WomenTech Global Conference where she explored how we can support women in the workplace to feel a greater sense of belonging, helping them to be their best selves at work.



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Employee Engagement for Gender Equality



Women@Criteo Community

With **around 700 members**, Women@Criteo is an inclusive internal network that aims to transform and promote gender equality within the company. Its mission is to be a catalyst for the advancement of women in the workplace at Criteo and in our industry to promote equal access to all opportunities across our organization.

In 2023, the community organized events and workshops with internal and external experts, such as conferences (“WomenDoTechToo” in Paris, and Barcelona, “Sports & Mental Health: How do they relate?”), Networking events (CEW x Women@Criteo in New York), and events with charities such as the Rêv’Elles day in Paris in March 2023. The community also organized social events such as a “Ceramic class” in Armenia and an “Aperitivo” in Barcelona with human bingo. In APAC, the team in Tokyo discussed Gender Equality during a roundtable for International Women’s Day.

In 2023, the Women@Criteo Community launched a “Women@Criteo podcast” and an “Inspiring Allies” reward program.

During International Women’s Day Week, some talks and virtual events were held:

"Because we're worth it"

Sherry Smith & Shenan Reed,
moderated by Elena Gulotta

"Championing Diverse Representation"

Megan Clarcken & Sarah Kate Ellis
(GLAAD)

#IamRemarkable Workshops

Led by Carlota Sola Casado &
Antoinette Nelisse

"Our Journey as Women Managers in the Tech Industry"

Fireside chat with Camille Moufle &
Sarah Nogueira.

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Women in Tech Network

To increase the retention of Women in Tech roles, the **Women-in-Tech Network** aims to:

- Multiply initiatives to attract more women into Criteo Tech roles;
- Ensure that the women in our Tech functions feel connected and supported in their growth and engagement at Criteo;
- Provide channels to listen to Women in Tech roles' feedback and activate a positive experience for all women at Criteo.

In this context, the DEI team ran several regional focus groups in EMEA and Americas for Women in R&D in 2022, and in 2023 for Women in Product functions, to get more insights into the needs and expectations of this internal population. It emerged that Criteo is well perceived in terms of its DEI commitment, flexible policy, and diverse recruitment; but that there is room for improvement in terms of how to live together, adopt inclusive behaviors, and boost career development support for women.

To meet these challenges, Criteo has developed a specific roadmap with two priorities: living well together and career development support. We have organized two workshops for R&D and Product Leadership team on Inclusive Leadership to strengthen the living well together. To support career development for our Women in Tech roles, we organized activities in September 2023 and December 2023.

In September 2023, the session was focused on the following:

- Exploring the myriad of career paths within the realm of R&D at Criteo;
- Providing Women in Tech roles with insights into the world of promotions and performance reviews that can shape their career trajectories;
- Allowing Women in Tech roles to express their wishes in coaching topics via an open-floor.

In December 2023, we planned 5 workshops on the following topics, each followed by 20 participants:

- 2 workshops on **Building a Successful Career in Tech** by Womentechforum;
- 2 workshops on **Embracing Mentorship | Maximizing Its Benefits** by Womentechforum;
- 1 workshop on **How to be Politically Savvy** by Womentechforum.

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Inclusion of the LGBTQIA+ Community

Criteo stands for an **open, inclusive, and safe work environment** and aims to provide visibility and a sense of belonging for LGBTQIA+ people and allies through various partnerships, initiatives, and events, as well as the work performed by Criteo's Pride community (see hereinafter).



MyGwork is a business community for LGBTQIA+ professionals, students, and inclusive employers. Criteo's partnership with MyGwork creates more opportunities to network, mentor, and build relationships inside and outside of Criteo in support of the LGBTQIA+ community. In 2023, Criteo participated in numerous events, including MyGwork WorkFair (the largest global virtual career fair for the LGBTQIA+ community) and WorkPride, a global five-days virtual Pride conference.



In 2022, Criteo signed the LGBTQIA+ Charter of L'Autre Cercle, a leading non-profit for the inclusion of LGBTQIA+ people in the professional world, thus committing to creating an inclusive environment for LGBTQIA+ employees, promoting equal rights and treatment for all employees regardless of their sexual orientation or gender identity.

For awards and recognitions related to LGBTQIA+ inclusion, see "CSR Approach - Awards and Recognitions" section of this Report.

The project called "That's My Name" allows all Criteo's employees to choose the name they wish to be known by and have it appear in the company's systems and tools. We understand that the ability to use a preferred name is essential to feel welcome and included. As an update to this project, in 2023, we enhanced 'That's My Name' to empower Criteo's employees who prefer to exclusively identify with their first name only, or who do not have a last name (which is often the case in some geographies).

Launched in 2022, the **LGBTQIA+ Inclusion Training** explores inclusive language and the different elements within LGBTQIA+, including sexual orientation and gender identity. This training covers the different experiences of trans and non-conforming individuals (such as non-binary people) and focuses on trans-inclusive workplaces and behaviors. The module explores the multitude of identities that fall under the '+' bracket, which are often misunderstood and sometimes completely erased. The objective is to support stronger inclusion for our LGBTQIA+ employees and provide opportunities for stronger allyship at Criteo.

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Inclusion of the LGBTQIA+ Community



Pride Community

With **around 300 members**, Criteo's Pride Community promotes initiatives to develop an open and inclusive work environment where Criteo's employees can be themselves and feel supported. In 2023, the Pride Community provided awareness on LGBTQIA+ Inclusion topics throughout the year.

The main milestones were the following:

- ✓ Moving Past Visibility with Diamond Stylz with Pride x BIPOC Communities (Trans Visibility Day)
- ✓ Trans Inclusion in the Workplace Workshop by MyGWork (Trans Visibility Day)
- ✓ Lesbian Role Models and Career Development with Pride X Women Communities (Lesbian Visibility Day)
- ✓ Psychological Safety Workshop by MyGwork (International Day against Homophobia, Biphobia, Transphobia)
- ✓ Criteo x Lloyds Bank Group: What Pride Month means to us (Pride Month)
- ✓ Bystander to Upstander - Allyship as a Verb Workshop by MyGwork (Pride Month)
- ✓ Pronoun Day Webinar with Pride x Education Communities (International Pronoun Day)
- ✓ Pride Community Mixer in New York and in Barcelona
- ✓ Coffee Pride Hours in three regions
- ✓ HalloQueer event in Sao Paolo
- ✓ LGBTech event in Paris hosted by Criteo
- ✓ 2023 Tokyo Rainbow Pride (April 2023)
- ✓ Barcelona Pride Parade (Pride Month)

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Parenthood Support at Criteo



Since the launch of Criteo's extended **secondary care parental leave**⁵⁵ in 2021, much has been done to support parents amongst our employees, as demonstrated by Criteo receiving the **Family Friendly Company Label**⁵⁶.

Other notable changes include Criteo's career website which now has a "[Supporting Families](#)" page explaining Criteo's vision and actions for a family-friendly company.

Another example of parenthood support at Criteo is the **"Carrot" program launched globally in 2022**. This program is an employer-sponsored inclusive fund for fertility treatments and family-forming services. It covers fertility education and assessments, fertility preservation, in vitro fertilization (IVF), donor-assisted reproduction, including gestational carrier services (where legally allowed), and adoption ([more information available here](#)). Today, most employees are eligible regardless of their gender, sexual orientation, single or couple status, etc. In addition, Criteo covers up to the equivalent of \$50K USD based on each country's cost of care as determined by Carrot for treatments and services per employee.

Criteo also partners with **Fertility Matters at Work**, an organization that educates and inspires businesses with an awareness of how fertility issues affect both their employees and their organization ([more information available here](#)). The organization also supports Criteo and provides guidance on how the company can improve to being a fertility-friendly employer of choice.

⁵⁵ Offered for four weeks across all locations globally, regardless of their gender or marital situations. ⁵⁶ We renewed the partnership with the family friendly company in March 2023.



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Parenthood Support at Criteo



Parents Community

With **over 350 members**, the Parents Community aims to support parents throughout their parenting journey, from the moment they discover their future parenthood to their return to work and beyond.

Some key actions taken by the Parents Community in 2023 include:

-  A fireside chat with the Education Community to celebrate International Family Day and discuss tips and tricks for keeping kids active during the holidays. Alongside this event, a guide has been created to support parents.
-  A cross-community event with Criteo's Criteable Community focusing on how we can balance our career and mental health while taking care of extended family needs.
-  Online Pediatric First Aid courses organized together with Criteo's Health & Safety team to help parents and anyone who is often interacting with kids to feel more confident and prepared if anything happens to the little ones.
-  Finally, the Parents Community organized different networking events such as "Bring your kids to office" event in New York, and "Parents Community Breakfasts" in APAC: Japan, South Korea, India, and Australia.

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Social Diversity

On the front of social diversity, the company took a significant step in 2022 with the launch of **Criteo's Open Path Program**. This internal program aims to:

- **Create more open opportunities** for students from underprivileged and/or non-traditional educational backgrounds who recently discovered the tech industry through engineering and technical training.
- **Offer them equitable access to employment** through a strong internal support system, including onboarding, mentorship, training, and upskilling.

Some populations and communities are indeed largely underrepresented in STEM (Science, Technology, Engineering, and Mathematics) studies and careers, and do not benefit from the same access and support to education and employment. With the Open Path Program, Criteo wants to create an environment that gives those populations access to a strong internal support system, tools and resources, to enable them to enter the job market successfully and potentially start a great career at Criteo.



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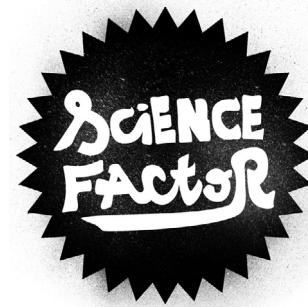
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Other initiatives and partnerships pursued in 2023 include:



Rêv'Elles: A French non-profit that inspires, motivates, and supports young women from underrepresented neighborhoods in their personal and professional development. Criteo actively participates in "Rêv'Elles Ton Potentiel" and "RVL Tech" programs ([more information available here](#)).



Global Contact/ Science Factor (France): The Science Factor project was created by Global Contact to encourage/arouse vocations for Science and Techniques, with a new challenge to reach more than 100,000 teenagers every year from 2023, especially young girls.



Oreegami (France): A Digital Marketing Academy which aims to help graduates and job seekers equally access promising career paths in digital professions. They work with French agencies and ad tech companies to prepare future advertising campaign managers.



Article 1: A non-profit which works towards a society where one's direction, academic success, and professional integration are not dependent on social, economic, and cultural backgrounds; it envisions a society where success is achieved through social connections and civic engagement.



Parents on Board (France): A job site for family-friendly companies.



Hellowork: The 1st French digital player in recruitment, employment, and training providing access to talents with disabilities.



Seekube: A recruitment platform that organizes more than 500 job dating events every year providing access to talents with disabilities.



MyGwork: A business community for LGBTQIA+ professionals, students, and inclusive employers.



Sistech: A European non-profit founded in 2017 to support displaced women access qualified and sustainable tech & digital job.

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Education Community

With **around 250 members**, the Education Community's goal is to support, guide, and encourage under-represented people in the employment market.

Some key achievements of the Education Community in 2023 are presented below:

-  Organization of a Job Discovery Day with Rêv'elles: In March 2023, the Education Community alongside the Women Community welcomed six young girls at Criteo's Paris office and introduced them to the Tech world with the aim to inspire, motivate and support young women from working-class neighborhoods in their personal and professional development.
-  In collaboration with the DEI and the Retail Media teams, the Education Community welcomed Oreegami in our Paris office.
-  In July 2023, a webinar was organized with the aim to explore and learn more about the latest innovations in AI in Education. The use of generative AI solutions such as ChatGPT, has raised several issues in the Education community: from ethical concerns to complex educational integrations into lectures. This session aimed to let the participants discover how our AI choices today are shaping the future of humanity and redefining education, with international expert and UNESCO panelist Dr. Delphine Le Serre.
-  Together with the BIPOC Community, the Education Community co-organized in October 2023 "Le Paris Noir Tour", which is a 2-hour tour aiming to let participants delve into the history of African-American expatriates in Paris, uncover the vibrant world of Black American artists and intellectuals.
-  The Pride x Education Communities collaborated in October 2023 to raise awareness on the use of pronouns and why they are important for us in life and work.

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People with Disabilities

Criteo's [Global Disability Policy](#) establishes our commitment to fostering and supporting a diverse workforce, and to integrating equal opportunities for people with disabilities into Criteo policies, procedures, decisions, and operations. Criteo is committed to ensuring equal access and participation for people with all types of disabilities (either physical or mental, and visible or hidden), and to managing people with disabilities in a way that allows them to maintain dignity, respect, and independence.

In 2023, our teams worked on various **initiatives to better include people with disabilities in the workforce**.

An initiative called "Impact Weeks" (mentioned earlier in this Report) was organized with a special focus on disability. During these two weeks, the Criteo Community and its volunteers organized a day to raise awareness around disabilities and collect donations for the charity **Handicap International France**.

A "**Hiring people with disabilities**" training is available to smooth the recruitment process for candidates with disabilities, and our **toolkit for managers** specifically addressing inclusion for employees with disabilities, available on the Portal People, aims to better welcome and support employees. In 2023 the DEI team alongside the Criteo Community created the Disability Awareness Training which provides introductory information about disability for all Criteo's employees.

Three employees became **disability referents in France in 2022**, in addition to their current job and responsibilities, who are part of the "Criteo Community" (see hereinafter) for France. A specific campaign was launched in 2023 in France to communicate around the role of these referents.

In 2023, their missions were to:

- Organize the **consideration of disability** throughout the recruitment process and integration;
- **Inform, guide, and support employees with disabilities;**
- **Develop and monitor external partnerships** (Agefiph⁵⁷, Cap Emploi, etc.);
- Organize **information and awareness-raising actions internally;**
- Ensure a **dedicated** monitoring of legal requirements and good practices (news, legal benchmark, Network of Disability Referents...);
- **Communicate internally** on the disability action plan, results, and experiences..., notably during meetings with the CSE/CSSCT⁵⁸ and externally.

In 2023, the **Agefiph** - an association that helps companies hire disabled people - performed an internal diagnosis in France, and the results were shared in May and June 2023. The proposed action plan includes the creation of a **committee on disabilities** on a global scale which met for the first time in October 2023. The primary area of focus is on communication, awareness-raising and employee training on disability in the workplace.

⁵⁷ "L'Association de gestion du fonds pour l'insertion des personnes handicapées" is the French organism that manages the fund for the integration of people with disabilities. ⁵⁸ Social and Economic Committees (CSE) and Health, Safety and Working Conditions Committees (CSSCT).

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People with Disabilities



Criteable Community

With **around 200 members**, the Criteable Community provides support for employees with disabilities. Its members are committed to ensuring that employees with disabilities have a positive experience at Criteo and are able to successfully grow in their careers and showcase their creativity, innovation, performance, and success.

In 2023, the Criteable Community achieved the following milestones, amongst other initiatives:

- ✓ For Disability Day, Criteable alongside the Parents Community organized an awareness session on the topics of neurodiversity, additional family care responsibilities, mental health, work-life balance;
- ✓ The Community also organized a "VR: Alternative Realities" session at the Barcelona Office. The participants got through different situations simulating various types of disabilities;
- ✓ The Criteable Community collaborated with the Talent Engagement team to celebrate World Mental Health Day as a part of the Community's commitments on this topic;
- ✓ Criteo took the #workingwithcancer pledge to erase the stigma of cancer in the workplace;
- ✓ The Criteable Community organized different activities to raise awareness during the Brest Cancer awareness month in October 2023;
- ✓ The Criteable Community organized two "Disability Weeks";
- ✓ The DEI team created a SharePoint page where Criteo's employees can find all information about disability status in the different countries where Criteo is located.

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Inclusion for the BIPOC Community

In 2023, Criteo pursued its commitments to support Black, Indigenous, and People of Color (BIPOC). One of the key actions was to develop a network of leaders all around the world, particularly in EMEA. Several initiatives were organized in terms of inclusion and diversity applied to the BIPOC Community, including but not limited to:

- **Partnership with the Boyd Initiative**, a US organization helping Black professionals to discover careers in Advertising and Media.
- Presence of a **DEI Program Manager for the Americas** in the DEI team to specifically support the United States focusing on increasing opportunities to attract, retain and develop underrepresented minorities.
- **The “Empower U” Program**: The Empower U program is an exclusive initiative dedicated to empowering high performers from underrepresented minorities/the global majority. In February 2023, in the context of Black History Month in the US, an initiative was set up called **“coaches of color”**. This initiative enabled certain profiles from underrepresented minorities, selected by the HR department for their potential within the company, to have access to coaching sessions to support them in their professional and personal development. Given the very positive feedback, we decided to extend this initiative to a larger number of people from underrepresented minorities by developing the Empower U Program.

The DEI team alongside the BIPOC Community offers access to career advancement through exclusive training, mentorship, and networking opportunities. In our ongoing commitment to inclusivity, the BIPOC Community will serve as an essential foundation for this initiative. The lived experiences of its members, their insights, and perspectives will be instrumental in guiding and promoting the next steps of our program. Recognizing the unique challenges and opportunities within the BIPOC Community will be crucial in ensuring the program's effectiveness and impact.



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Inclusion for the BIPOC Community



BIPOC Community

With **around 180 members**, the 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 at Criteo was inspired by the [BIPOC Project](#).

Some key achievements of the BIPOC Community in 2023 are presented below:

- ✓ Moving Past Visibility with Diamond Stylz (in collaboration with the Pride Community);
- ✓ Juneteenth Trivia Celebration;
- ✓ Hispanic Heritage Month Panel NY with external guests from IAB and L'Oreal;
- ✓ Book Club Collaboration for Hispanic Heritage Month;
- ✓ Rising Above: Brandi Benson on Allyship, Recovery and Resilience (in collaboration with the Criteo and Women's Communities);
- ✓ Black History Walks in Paris and London;
- ✓ Elevate Focus Groups & Program Restructuring.

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Non-discrimination and Prevention of Harassment

In 2022, Criteo updated its **Code of Business Conduct & Ethics** ([the "Code" available here](#)). It includes the principle of **non-discrimination and anti-harassment**, which is applicable across all locations globally, and this was accompanied by the launch of a compulsory e-Learning module.

Alongside, Criteo developed a global e-learning with country-specific modules related to **Preventing Harassment and Discrimination in the Workplace**, launched at the same time, which requires mandatory completion. Employees are required to complete this training annually. The global completion rate on December 31, 2023, reached 78% (+5% commenced/near completion).

In 2023, **"Criteo Hires"** was created as a joint project of our DEI, Talent Acquisition (TA) and L&D teams. The pilot training launched in October was optional for recruiters, hiring managers and interviewers. From 2024 on, we aim to make this training mandatory for the above-mentioned populations.

The training includes 3 modules:

- **Module 1:** a mandatory e-learning on **recruitment basics** (job description, how to train the panel of interviewers);
- **Module 2:** a mandatory e-learning on **unconscious bias and non-discrimination on recruitment**;
- **Module 3:** online workshop conducted by our L&D team to put into practice what has been learned. This module is compulsory only for new hiring managers and the TA team.

In addition, Criteo applies its **equal opportunity approach**⁵⁹ which strictly forbids all forms of discrimination, whether at the recruitment stage or afterward regarding promotions, salary increases, and benefits, and specifies that no employee may be discriminated against based on gender, race, ethnicity, religious belief, disability, national origin, veteran status, marital status, or sexual orientation.

Today, **93 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 most of our workforce is less than 45 years old (90% of employees), we are focused on our commitment to provide equal opportunities to all without discrimination based on age, be it through external hires or internal promotions.

HIRES AND PROMOTIONS OF EMPLOYEES ABOVE 40 YEARS OLD	2022	2023
Share of employees over 40 years old in hires	10%	8%
Share of employees over 40 years old in promotions	10%	10%

⁵⁹Our Diversity, Equity, and Diversity (DEI) Policy is [available here](#).

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Non-discrimination and Prevention of Harassment

Criteo also recognizes the importance of freedom of speech for employees, and no discrimination is directed at employee representatives. Criteo's Code of Business Conduct & Ethics (see "Governance" section of this Report) points out the importance of respecting **freedom of speech**. In its **Human Rights Policy**, Criteo also abides several fundamental principles, namely:

- The elimination of forced or compulsory labor;
- The abolition of child labor;
- The elimination of discrimination in respect of employment and occupation.

Criteo's **Human Rights Policy** is available on the company's [Investor Relations website here](#).



CSRD concordance:
ESRS S4 - Consumers and end-users - Sub-topic: Information-related impacts for consumers and/or end-users -
Personal safety of consumers and/or end-users - Social inclusion of consumers and/or end-users



Sustainable Relationships with Clients and End-Users

Dialogue with Clients

Ethics in our Ads

Data Privacy & Information Security

Dialogue with Clients

We collaborate closely with our 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 achievement of clients' 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, which are key factors in Criteo's ability to maintain close to 90% client retention every quarter⁶⁰ since 2011.

To continue improving the quality of its services and reinforce trust, Criteo conducts an **annual client satisfaction survey (CSAT Survey)**. Close to 1,900 client contacts responded this year, representing 1,523 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.

As a testament to Criteo's commitment to client-centricity, a team was created to drive measurable change based on them.

More information regarding the products and services offered to our clients by Criteo is available in the presentation of the business model in this CSR Report's Introduction.

⁶⁰ Quarterly retention rate represents the percentage of live clients during the previous quarter that continued to be live clients during the current quarter.



Ethics in our Ads

We are aware at Criteo that being a responsible company also means offering responsible services. We intend to address expectations regarding ethics in our ads.

For that purpose, Criteo has set up a **working group comprised of its Legal team and Artificial Intelligence labs** to reflect on the ethical nature of its service and products, as well as a **Product Ethics Committee (PEC)** chaired by Criteo's Chief Legal and Corporate Affairs Officer, and gathering executives from the Product, R&D, Legal, HR, Marketing and Commercial teams.

The objective of the PEC is to ensure ethical product development in order to provide our clients and partners with trusted advertising and maintain a sense of pride in Criteo about our company's approach. The PEC anticipates and proactively seeks to respond to any ethical concerns before they are raised by our stakeholders or materialized. The PEC steers internal standards regarding Criteo's products, while also acting as a multi-stakeholder and cross-continental forum to discuss and act upon regulatory and industry developments.

In 2023, the committee worked on:

- The update of the **Criteo Advertising Guidelines** ([available here](#)) led by the Legal Commercial & Product Team to include Iponweb acquired in 2022. This included the unification and alignment of our set of rules to cover the new services provided by Iponweb.
- A study on ad fairness and causality led by the AI Lab and Product Analytics members to define a framework for the analysis of fairness in the context of our privacy-by-design platform.
- The risks of AI-generated content on intellectual property, disinformation and performance on the supply side led by the Product Team and the Legal Commercial Team.
- The advertisement of products in intimate/embarrassing categories led by the Product Team and the Legal Commercial Team.

Ethics in our Ads

Criteo is committed to delivering a trusted and safe advertising experience to marketers and media-owners alike.

Our supply partners and advertisers must always adhere to our **Supply Partner Guidelines and Advertising Guidelines** which are designed to set up a common framework encouraging ethical practices in Criteo's network of publishers when it comes to the use of our products and services, for instance regarding:

- Content restrictions (restrictions on certain topics such as alcohol, tobacco, gambling, firearms and weapons, etc.; on the display of ads on content that promotes harassment, hate speech or violence, or intentionally propagates disinformation);
- Ad placement (pop-ups, disruptive ads, incentivized or rewarded clicks, etc.);
- Traffic quality (manipulation of personal information, cookie abuse, etc.);
- Transparent supply chain.

More information on our Supply Partner Guidelines is available on [Criteo's website here](#).

On the demand side, the **Advertising Guidelines**, mentioned above, also constitute a cornerstone of shaping strong and ethical relations with our clients. Along with providing them with guidelines on technical matters or regulatory matters, our guidelines are indeed at the very core of our ethical approach by defining what our clients cannot do using our platform, for instance regarding:

- Restriction on content that promotes harassment or hate speech, adult content, drugs, firearms or products that bear deceptive, false or misleading claims, that infringe intellectual property;
- Restriction on targeting children under the age required for consent to the collection of personal information or on the basis of user protected or sensitive characteristics;
- Specification on ad formats and technical guidelines.

In addition, Criteo abides by key industry standards.

Ethics in our Ads

In June 2022, Criteo signed **IBM's Advertising Fairness Pledge**. The initiative aims to bring together agencies, brands, and other leaders to generate awareness and improve fairness in marketing campaigns. Through this signature Criteo is committed to "get the facts on bias in advertising technology, explore the impact of bias on advertising campaigns and practices and be an advocate for Advertising Fairness" ([more details are available here](#)). This is pursuant to these objectives that members of the AI Lab and Product Analytics teams have developed a first framework for the study of ad fairness in our privacy-by-design platform. The approach was applied to housing and employment verticals. If the results remain sensitive to the assumptions taken, it is a first step for better understanding the macro behavior of our system.

In 2022, Criteo established a **research partnership between the Criteo AI Lab and Inria** (the French National Institute for Research in Digital Science and Technology) for the **development of responsible Artificial Intelligence (AI)**. The first major action of this partnership is the creation of a joint project-team (hosted at the ENSAE, Institut Polytechnique of Paris), named "Fairplay". Its mission is to study the impact of AI on the design of transparent and fair marketplaces, and how to tradeoff efficiency to ethical concerns. With this objective in mind, Fairplay is a unique mix of data-scientists, economists, mathematicians, and engineers, from Criteo and academia ([more details are available here](#)). Since its creation, many efforts were put into the study and research of new online ethical marketplaces.

The different studies include the design of a new mechanism to incentivize different players (in the Criteo use case, the advertisers) to share their datasets to collectively learn some improved prediction models, compared to the existing scenario where they operate in silo. The objective is to find a way to compensate the largest contributor (who brings the most value to the coalition) through a system of well-calibrated retributions. Other lines of research consist of reconciling fairness objectives with privacy ones (those two are typically antagonists, as the former requires to use sensitive attributes and the latter to forget them), and/or designing new online decision algorithms with global fairness constraints.

Those scientific contributions have been submitted and/or published in the most selective scientific conferences. The interplay between the Criteo AI Lab and the academic world has also been strengthened by a series of joint events, such as an internal weekly seminar, the joint participation to workshops and conferences, and the creation of new prospective working groups on fairness-related research questions.

Dialogue
with Clients

Ethics in our Ads

Data Privacy &
Information Security

Data Privacy and Information Security

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 **in particular the European GDPR (General Data Protection Regulation)** and also the ePrivacy directive as implemented in the legislation of European Union member states. The legal team actively monitors the evolution of regulations in order to anticipate and prepare for future changes.

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 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 Criteo's products is implemented and regularly updated by Criteo's Privacy Team**. This privacy policy aims to be user-friendly and transparent for users regarding their rights when it comes to data and how to exercise their rights of access or deletion, for example. Criteo's **Privacy Policy** was last updated in 2022, to improve transparency towards users. The current version of the Policy is available on [Criteo's website here](#).

Both Criteo's **Supply Partner Guidelines** ([available here](#)) and Criteo's **Advertising Guidelines** ([available here](#)) contain specific sections on privacy. In addition, Criteo's **Privacy Guidelines for Clients and Publishers Partners** are available to our partners to ensure they have the right understanding of the data collection practices at Criteo. These guidelines are available on [Criteo's website here](#) and are updated regularly.



Data Privacy and Information Security

Privacy by Design

Our Product teams develop every product feature with privacy in mind as the cornerstone of Privacy-by-Design. Criteo is fully committed to identity protection. Criteo's activities are based on the use of "pseudonymous identifiers" that do not enable the identification of a physical person.

Privacy-by-Design is Criteo's long-standing practice and commitment to ensuring industry-leading privacy, security, and safety for users and marketers.

It means that a team of senior privacy specialists is involved at every stage of the product development pipeline. We design products by challenging ourselves to collect as little data 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 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:

- A designated **Data Protection Officer** (DPO) along with a team of privacy experts. In fact, being aware of the importance of the subject, Criteo appointed a DPO as early as 2013, i.e., long before the GDPR became effective.
- The privacy experts sit within the Product and R&D team. 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** 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.

Dialogue
with Clients

Ethics in our Ads

Data Privacy &
Information Security

Data Privacy and Information Security

Strict Security Measures

We utilize modern pseudonymous methods, such as MD5⁶¹ and SHA-256⁶² double-hashing processes, which are considered as best market practices under the GDPR and in the industry at large. Also, we willingly never store any directly identifying personal information about individual users. Indeed, as mentioned above, the data is “pseudonymized” which does not allow Criteo to identify users.

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 competent national authorities where required. For instance, Criteo must 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 2023 in relation to the services we provide to our clients.

We implement regular phishing simulation campaigns with mandatory pieces of training for employees, in order to raise employees' awareness and to reduce the risk of security incidents. A public page has been made available [on our website](#) to inform clients and partners of the threats we have identified.

As required by applicable law, Criteo maintains strict security measures when collecting user data from clients.

⁶¹ Message-Digest Algorithm (MD). ⁶² Secure Hash Algorithm (SHA).

Dialogue
with Clients

Ethics in our Ads

Data Privacy &
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Data Privacy and Information Security

Transparency and Control

Criteo has long recognized the need to **balance relevant advertising experiences with privacy expectations while empowering users to control their experiences**. While some users 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 industry and self-regulatory programs supporting these objectives. For example, we are fully committed to the AdChoices icon program led by EDAA⁶³, the FEDMA⁶⁴ Code of Conduct, the IAB⁶⁵ Transparency and Consent Framework, the IAB CCPA⁶⁶ framework, the NAI⁶⁷ Code of Conduct, or the Digital Advertising Alliance CCPA⁶⁸ opt-out mechanisms.

The **AdChoices program** enables users, with a single click, to see exactly where Criteo is using data, and how we protect their privacy. When a user chooses to opt-out or withdraw consent depending on applicable law, we immediately remove all identifiers from their browsers, making it impossible to target them in the future. Per European data protection regulations, collected user-level data is only kept for 13 months as a maximum.

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. These existing industry initiatives and self-regulations have succeeded so far in building user trust. We strongly believe in the benefits of self-regulation, which enables us to meet client's privacy expectations in a fast-paced internet environment.

We believe that this transparent, user-centric, and controllable approach to privacy empowers users to make better-informed decisions about how we use their data. **We require our clients and publishers to provide information to users 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 users, and our commerce and brand clients are key competitive advantages in the market.

⁶³ European Interactive Digital Advertising Alliance. ⁶⁴ Federation of European Data and Marketing. ⁶⁵ Interactive Advertising Bureau. ⁶⁶ California Consumer Privacy Act. ⁶⁷ Network Advertising Initiative. ⁶⁸ California Consumer Privacy Act.

Data Privacy and Information Security

Industry Leadership

In 2022, Criteo joined the **Partnership for Responsible Addressable Media (PRAM)**, a collaborative cross-industry initiative, that is one of the leading voices contributing to draft policies for responsible use of personal data.

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.

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 regarding cyber-security are carried out for Criteo's employees, and in 2021, trainings content was repurposed, reorganized and retailored to adapt to work-from-home needs and new processes.

Governance

CSRD concordance:
ESRS G1 - Business conduct - Sub-topics: Corporate culture, Protection of whistle-blowers, Political engagement, Management of relationships with suppliers, Corruption and bribery

Code of Business Conduct & Ethics

Global Tax Compliance

Anti-corruption

Whistle-blowing & Alert Mechanisms

Operating Responsibly

Criteo is committed to carrying out its business in compliance with local and international regulations in all the countries it operates and according to high ethical principles. Ethics and compliance are the cornerstones of sustainable value creation, and Criteo's activities are part of this responsible, long-term vision. This commitment is reflected in our **Code of Business Conduct & Ethics**, where ethics and compliance are at the heart of our actions, as a fundamental guarantee of trust and high standards for all our employees, communities, clients, and stakeholders.

Code of Business Conduct & Ethics

Criteo has adopted a **Code of Business Conduct & Ethics** ([available here](#)), setting out the policies and procedures that reflect its commitment to maintaining the highest standards of honesty, integrity, and ethics when conducting business.

The Code of Business Conduct & Ethics, approved by Criteo's Board of Directors, and reviewed in 2022, is an extension of Criteo Values. It is designed to help guide employees' conduct, so that they make the right decisions for themselves and Criteo. It includes "Do's and Don'ts" and real-life scenarios and examples, allowing to better understand what is expected in terms of ethical behaviors and includes a summary of its Global Anti-Corruption Policy. The Code of Business Conduct & Ethics defines who Criteo is and what Criteo stands for. It is a guide to acting with transparency and responsibly.

In 2023, the completion rate for the Code of Business Conduct & Ethics training was 98%. We aim to maintain this score at 80% or more each year.



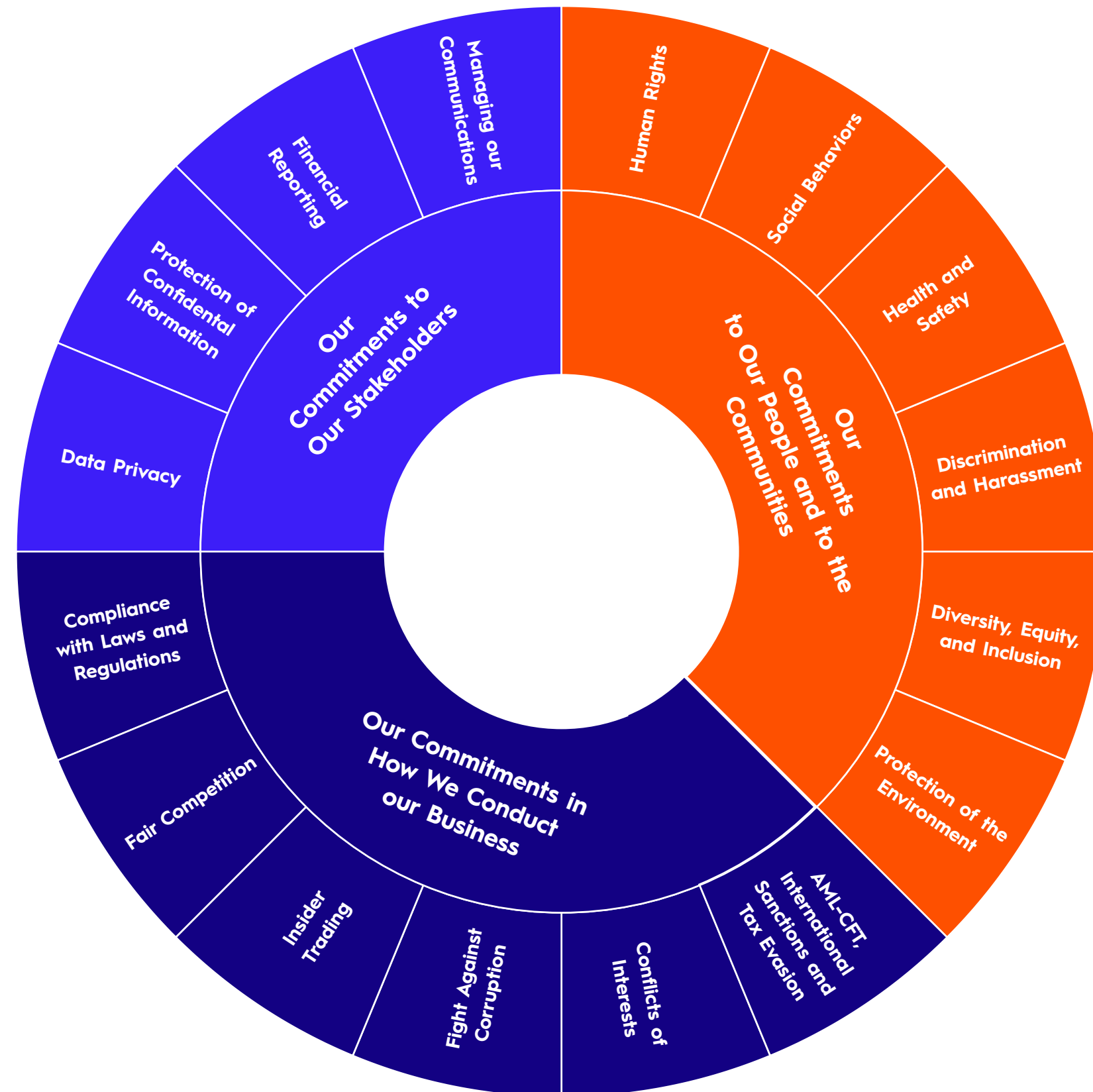
Code of Business Conduct & Ethics

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Whistle-blowing & Alert Mechanisms

Operating Responsibly



"Our Code defines who we are and what we stand for. It is a guide to act with transparency and responsibly."

Megan Clarcken



Code of Business
Conduct & Ethics

Global Tax
Compliance

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Alert Mechanisms

Global Tax Compliance

As a multinational organization, 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.

Criteo's management is **committed to ensuring that all their entities meet their tax obligations and comply with the relevant tax laws in each jurisdiction** in line with the Code of Business Conduct & Ethics and OECD⁶⁹ guidelines. Criteo is only located in countries where there are commercial activities, and 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 Form 10-K](#).

⁶⁹Organization for Economic Co-operation and Development (OECD).



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Anti-corruption

Criteo is deeply committed to fighting corruption. Thus, controlling the risk of non-compliance is a priority to protect Criteo's reputation.

Criteo has zero tolerance for bribery and corruption. We prohibit corruption and payments of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. We observe the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, French Loi Sapin II, as well as the applicable anti-corruption laws of all the countries in which it operates.



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Anti-corruption

To avoid corruption, Criteo implemented several policies, including:

Criteo's Code of Business Conduct & Ethics

(updated in 2022) is our reference document which sets out the policies and procedures that reflect the company's commitment to maintaining the highest standards of honesty, integrity and ethics when conducting Criteo's business. More information is available in "Governance - Code of Business Conduct & Ethics" section of this Report.

Criteo's Third Party Code of Conduct (created in 2022) provides guidance to Criteo's Third Parties on how to consider ethics and compliance in their work with us. This document is a framework to help them to better understand what Criteo expects while conducting business.

Criteo's Global Anti-Corruption Policy (updated in 2022) provides further details on our anti-corruption efforts, 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. This policy also summarizes the anti-corruption laws and regulations in the various countries where Criteo conducts business.

Criteo's Gifts, Hospitality & Entertainment Policy

(updated in 2022) defines the rules to apply for the offering or the acceptance of gifts, entertainment and hospitalities. It provides a single and unique reference and guide on its related matters. It also strictly prohibits Criteo's 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/from a foreign government official, a political party, political party official, a candidate for political office, or private/commercial third party, for the purpose of influencing official acts, obtaining or retaining business or to secure an improper advantage.

Criteo's Conflicts of Interest & Related Person

Transaction Policy (updated in 2022) provides detailed information on how to identify, avoid and address potential or actual conflicts of interest, how to disclose potential or actual conflicts of interest, and the process to follow.

Criteo's Whistleblowing Procedure (updated in 2022) provides guidance on the reporting and handling of concerns regarding any violation of laws and regulations, or any misconduct or unethical behavior. It applies to all Criteo's employees as well as other third parties working with Criteo specifically selected.

Criteo's Third Parties Due Diligence Procedure

(created in 2023) details the rules and processes regarding Criteo's third parties assessment and the measures taken to mitigate corruption and money laundering – financing terrorism risks they might trigger. The due diligence performed varies depending on the level of risks presented by our third parties.

Selected policies are available on the company's [Investor Relations website here](#).

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Anti-corruption

To ensure awareness of anti-corruption matters, all employees are required to regularly complete online the Code of Business Conduct & Ethics piece of training to prevent and deal with any risk situation that may arise within the context of their work, and a specific section is devoted to the fight against corruption. As indicated earlier in this Report, in 2023, **the completion rate is 98%**.

A dedicated compliance training course covering several compliance-related matters, including anti-corruption, was completed by employees identified as more exposed than others to corruption risks according to their activities within the company. 94% of the population at risk has been trained in 2023.

Criteo regularly **assesses its corruption risks and its controls** to ensure ethical conduct by all Criteo's employees and to raise overall awareness. These efforts include a periodic **corruption and influence peddling risk mapping** according to a dedicated methodology validated by the executive management, during which Criteo reviews its corruption risks and identify controls to address any gaps that arise during the assessment.

The Ethics and Compliance Program is implemented by the **Compliance Team** which regularly reports its activities to the **GRCC**, and ultimately to the **Board of Directors**, which oversees, via its audit committee, the deployment thereof on a quarterly basis and provides independent reviews due to its composition of non-executive directors.



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**Whistle-blowing &
Alert Mechanisms**

Whistleblowing and Alert Mechanisms

Every Criteo's employee as well as every other third party working for Criteo has a right and responsibility to report suspected violations of applicable laws, Criteo's Code of Business Conduct & Ethics and of any Criteo policies, or generally when facing a situation that does not feel right.

Criteo welcomes employees as well as other third parties working for Criteo specifically selected to use the **available whistleblowing channels** made available:

- **A secure email to Criteo's whistleblowing inbox at speakup@criteo.com;**
- **The Criteo Whistleblower Hotline:** a confidential 24/7 service;
- **The secure Whistleblowing Form** hosted by a third party where reports can be made anonymously;
- If not done in the previous step, they can **contact the Compliance Team at ethics@criteo.com.**

Concerns reported through these channels are only accessible to the **chairperson of Criteo's audit committee** who is an independent director and is neither an employee nor a manager of Criteo, the **Chief Legal and Corporate Affairs Officer, who is also the Chief Compliance Officer**, and finally, the **SVP, Deputy General Counsel and Associate Corporate Secretary** and the **Compliance Manager**.

The Chief Compliance Officer can designate new recipients to the channels described above among members of the Compliance team and/or of the Internal Control team.

All reports are kept confidential as required under applicable law.

Although Criteo's employees as well as other third parties working for Criteo specifically selected may choose to remain anonymous when using any of these channels, Criteo strongly discourages anonymous reporting and prefers employees as well as other third parties working for Criteo specifically selected to identify themselves in order to be able to assure proper follow-up and feedback to them.

Criteo strictly prohibits any type of retaliation under the terms of the Code of Business Conduct & Ethics and the Criteo Whistleblowing Procedure. Anyone making a complaint in good faith will not be subject to any direct or indirect sanction or detrimental treatment from their reports, even if the alleged facts are inaccurate or do not result in any action.

All employees in all countries received extensive information about the whistleblowing system's implementation. The Code of Business Conduct & Ethics training raises awareness on whistleblowing and alerts mechanisms. Awareness is also raised on regular basis with Employees. More specifically, in September 2023, a reminder has been made on the Whistleblowing Procedure with People Business Partners to update their knowledge of the procedure as they are often the persons to receive alerts from employees.

Appendix

Methodological Note

Criteo's CSR Report constitutes the Non-Financial Performance Statement to be established by Criteo in accordance with Article L.225-102-1 of the French Commercial Code (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, 2023, to December 31, 2023.

In 2023, Criteo extended the CSR reporting scope covered in the CSR Report so that it matches with the financial reporting scope⁷⁰. All entities within Criteo are thus included in the 2023 CSR reporting regardless of the number of employees. In the previous years, the CSR scope of reporting excluded all entities with less than 50 employees.

Vigilance point: Legal entities that joined Criteo's financial scope in year N are included in the CSR reporting scope in year N+1 (except for Brandcrush, acquired in 2023, which has been included in this 2023 report).

Relevance of CSR Indicators

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

- A benchmark on CSR best practices among IT sector leaders;
- Workforce-related, environmental, and social impacts and risks analysis of Criteo's activity;
- The SASB standard;
- 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 Sustainability team, reporting contributors and proofreaders, considering 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 oversees 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.

Criteo also mandates an independent third-party body to verify and validate the reliability of Criteo CSR information (audit). The nature of verification work conducted, and external conclusions are available on demand.

⁷⁰ Previously, only legal entities with more than 50 employees were included in the CSR scope. For electricity consumption, only leased offices with more than 50 employees were included, due to the information being difficult to collect for smaller offices, which became possible in 2023 thanks to the upgrade in reporting tools.

CSR Indicators – Calculation and Estimation Methods

Headcount

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

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

All gender-related data featured in the Headcount section of this Report is self-declared under three categories: Male, Female, Not declared. This data was not collected specifically for the purpose of this Report but gathered via our internal instances, reports, or interfaces where "Gender" is used (for example, in some countries, for payroll purposes, social security, or as a legal requirement or into benefits...). The category "not declared" refers to all employees that did not answer either "male" or "female".



CSR Indicators – Calculation and Estimation Methods

Training

Training hours from all employees are taken into account, including employees who left the company during the reporting period. Training hours for subcontractors or consultants who have been trained by Criteo are not included in the calculation of training hours.

Face-to-face training hours

Training data is collected from Criteo's Learning Management System tool.

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 People 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);
- Anti-harassment, Anti-corruption for high-risk population training, and Code of Business Conduct & Ethics pieces of training.

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 for pro-rata temporis, otherwise, hours are included within year N figures.

CSR Indicators – Calculation and Estimation Methods

E-learning training hours

Due to the large choice of e-learning platforms offered to Criteo's employees (Coursera, LinkedIn Learning, The Learning Quest, O'Reilly, 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:
 - Micro-learning: recorded from one minute on (LinkedIn Learning; The Learning Zone; The Learning Quest; O'Reilly; DataCamp; TLZone). As the micro-learning platforms are composed of short contents focusing on the essential, a limit of one-min has been set up.
 - MOOC learning: recorded from one hour to max 25 hours (Coursera). As the MOOC courses should take between 19 and 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 team.
- Language training courses do not have a minimum duration as we considered that language learning should be measured from the start.

CSR Indicators – Calculation and Estimation Methods

E-learning training hours

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.

Whenever a significant change in methodology occurs, N-1 data for training may be updated according to the new methodology to allow for comparability.

CSR Indicators – Calculation and Estimation Methods

Business trips:

Data from the business travel agency, Egencia, includes all air travel scope as well as train trips.

Commuting:

Data regarding the commuting of employees between one's place of residence and one's place of work is calculated via extrapolations and has a high level of uncertainty.

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 needs are negligible.

Amount of renewable energy consumed for data centers:

This data is calculated based on the amount of energy supplied from decarbonized sources or offset through certificates.

Amount of renewable energy consumed for offices:

The national renewable energy rates used are from the International Energy Agency (IAE).

CO2 emissions:

Emission coefficients per country from ADEME database have been used for the calculation. CO2 emissions are now calculated using the SWEEP tool.

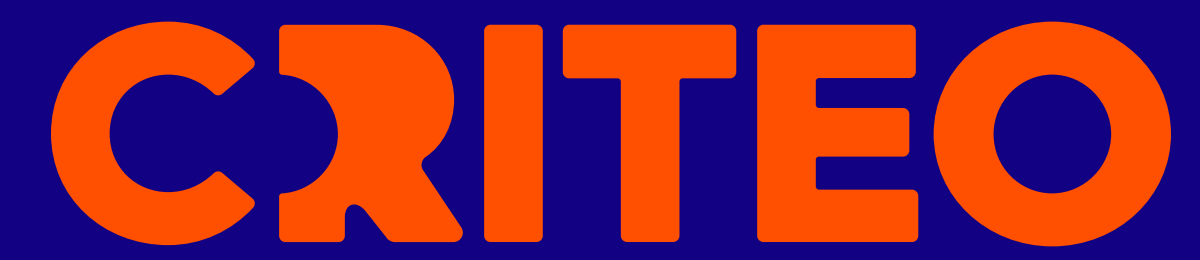
Number of employees who participated in CSR events organized through Criteo Cares:

For each event the number of people who attended is counted, and the indicator consists of consolidated figures for each event. This indicator thus covers the total participation number and not the number of individual attendances.

Other information: This Report does not contain disclosures on the following information mentioned under article L. 225-102-1 of the French Commercial Code, that was considered either nonmaterial as part of the materiality analysis presented in the "CSR Approach" section of this report, or non-relevant with regard to Criteo's activities:

- "Food waste",
- "Food insecurity",
- "Animal well-being",
- "Responsible food choices",
- "Promotion of physical and sportive activities",
- "Promotion of the link between the French Nation and the army and support to employees' engaged in the army reserve".

A more detailed description of CSR reporting protocols and audited KPIs definitions can be found in our internal methodology guide called "CSR Reporting - Methodology Guide and KPI definitions".

The Criteo logo is displayed in a bold, orange, sans-serif font. The letter 'C' is significantly larger than the other letters, and the 'R' has a unique cutout design. The logo is centered within a dark blue semi-circular shape that forms the bottom half of the slide.

CRITEO

Contact

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