

Non-Financial Performance Statement 2021

Criteo's Corporate Social Responsibility report

February 2022

Message from the CEO, Megan Clarken, and Chairwoman of the Board, Rachel Picard

The health, safety, and mental wellbeing of our employees and their families has always been our top priority, and continues to be, as we navigate the evolving global pandemic. We worked incredibly hard to understand the needs of our employees and adapted our policies to be more flexible, to support remote working throughout 2021, as well as implemented COVID-19 safety measures throughout our workplaces for those seeking the choice to work onsite.

And while the circumstances regarding the COVID-19 pandemic remain uncertain, Criteo is always looking forward and taking action to make the future better. This starts with supporting our people. To do this, we leveled up our Diversity, Equity, and Inclusion (DEI) commitment with the appointment of our first SVP of Global Diversity, Equity, and Inclusion. We also reached full pay parity among our employees regardless of gender and signed an LGBTQIA+ charter with L'Autre Cercle to support our commitment to an inclusive culture for all. Furthermore, we created a global disability policy to remove barriers throughout our workplace and welcome opportunities to increase our diversity. Through these efforts, we're demonstrating our commitment to providing equal access and opportunity for all and promoting respect, supporting inclusion, and valuing uniqueness.

In 2021, our Criteo Cares program continued to grow, and we launched our new Parents Community, as well as levelled up the engagement and support for our six other global community groups (also called "Employee Resource Groups"). These communities played an integral role in the incredible success of Criteo's celebrations like International Women's Day, Black History Month, Earth Day, and Pride Month. We also launched a brand-new volunteering and giving platform, 'GIVING', where our employees can access charitable and volunteering activities globally. And they're offered paid time off, supported by Criteo, so they can raise funds or take part in challenges to help the causes that are close to their hearts. These causes range from supporting local communities to raising awareness about social issues and caring for our planet.

Helping the environment is another key area of focus for Criteo and we're delighted that 100% of our data center energy is now using renewable energy sources or offset by certificates. And in 2022, we'll be working towards defining an ambitious environmental strategy and action plan to further protect the planet. Our focus is to build a path forward that benefits our employees, our partners, clients, and the consumers we serve, as well as support a positive effect on our planet. It will also be something that we can all be proud of, enriching our culture and echoing our values of Open, Together, and Impactful, which we continue to live and breathe every day.

We're so proud of our positive, passionate, and committed employees who take care of each other, and actively seek to sustainably impact the world around them every day and make Criteo's CSR activity so impactful.

About this 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 to communicate our efforts externally. We are proud to affirm that our people have always been the first ones driving us to "do better", as evidenced by the multiple social and environmental initiatives over the years from our offices in every part of the world.

As Criteo advances toward increasingly formalized and ambitious commitments, CSR remains a key focus of our business and responsibility. For instance, the goals we are setting in terms of Diversity, Equity and Inclusion (DEI) and Ethics or Sustainability will only be achieved through the engagement of all employees. They will also shape our future growth; define the value we want to create for society.

This annual report describes Criteo's overall CSR strategy, as well as the highlights of 2021 and the results we achieved over the course of last year. Also, we know sustainability is a journey, and it is important for us to set ambitious goals. And we will continue to do so and report on our progress going forward.

Furthermore, the report was prepared in accordance with the transposition of the European Directive 2014/95/EU regarding the Non-Financial Performance Statement, in addition to recognized non-financial reporting standards such as the Sustainability Accounting Standards Board (SASB).

This report was audited by an independent third-party, as required by the aforementioned European Directive. More information regarding this external audit and the process for establishing the CSR report is available in the following sections i. and ii., as well as in the Methodological Note at the end of this report.

i. About Criteo

Our activities and business model

Founded in 2005, Criteo S.A. is a French technology company, headquartered in Paris and listed on NASDAQ, with a strong presence worldwide. We began our commercial activities in France in 2007 and have since expanded our business into Western Europe, North America (in 2009), and the Asia-Pacific region (in 2010). Several acquisitions over the years, such as HookLogic, Inc. in 2016, or Mabaya in 2021, have supported the company's growth and allowed us to steadily develop our offering and market presence.

Description of main activities, products and services: 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 operate in commerce media, the future of digital advertising leveraging commerce data and artificial intelligence to connect ecommerce, digital marketing and media monetization, and 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 from a single product to a multi-solution platform provider, fast diversifying our business into new solutions.

We enable brands', retailers', and media owners' growth by providing best-in-class marketing and monetization services on the open Internet, driving approximately \$40 billion of commerce outcomes for our customers — in the form of product sales and leads for marketers and advertising revenues for media owners. Historically, the legacy of Criteo's model focused solely on converting our clients' website visitors into customers, enabling us to charge our clients when users engage with an advertisement we deliver, usually by clicking on it. This pay-for-performance pricing model clearly links the cost of an advertising campaign to its effectiveness and performance in driving conversions and continues to be valued as such by our clients. We have since expanded our solutions to address a broader range of marketing and monetization goals, including audience targeting and brand awareness. In 2021, we operated in 96 countries.

The Criteo Commerce Media Platform: We offer our marketer and media owner clients a single platform for first-party data-based marketing and monetization, that provides a holistic suite of solutions, powered by AI technology and activates the world's largest set of commerce data. Our technology is optimized to efficiently and effectively drive trusted and impactful business outcomes for our brand, retailer and media owner clients. These include, for example, driving engagement for their brand, shop, applications, products, and services; driving product sales, driving application installs and consumer visits; driving product consideration from in-market commerce audiences; or driving advertising revenue for media owners and retailers by monetizing their data and audiences. Criteo solutions work seamlessly across digital devices, commerce and advertising environments (browsers, applications, connected TV and physical retail stores), platforms and operating systems, advertising channels, and publisher

environments. We provide our clients with extensive real-time access to advertising inventory through direct relationships with thousands of publisher partners, as well as real-time bidding exchanges. The Criteo Commerce Media Platform is comprised of:

- Criteo's large-scale First-Party Media Network
- Criteo's world-class AI Engine
- Criteo's powerful solutions: Marketing Solutions and Retail Media

Challenges, trends and opportunities: As part of our transformation, we have expanded our business through several opportunities, both within our existing suite of solutions and in new areas. Our overarching priority is to drive sustainable and profitable growth for our business. This involves further increasing our focus on the fast-growing e-commerce space and broadening our value proposition to cover all commerce media marketing goals on our single Commerce Media Platform in a holistic way. In parallel, we are focused on investing in our strategic growth priorities and self-funding for these investments by driving efficiency across the organization.

Over the past four years, the growth of retargeting has been slowing down, peaking in 2019 and 2020, before stabilizing in 2021 despite incremental privacy headwinds. Over the period, the end of support of third-party cookies on several browsers have had a significant impact on our business on the web, including retargeting. The need to meet rising consumer demand for privacy-safe advertising corresponds to an underlying trend that Criteo must adapt for the future of addressability. And this is one of the key factors for the ongoing business transformation. The COVID-19 pandemic was an additional headwind in 2020 and continued to impact our clients in the travel and classifieds verticals in 2021. Beyond these headwinds, retargeting has proven resilient and continued to grow in the retail vertical, central to our business.

Criteo's ongoing transformation and growth take these long-term trends into account. For instance, we intend to continue to collaborate with existing and new industry partners to extend the capabilities and functionalities of the Criteo Commerce Media Platform, beyond what we currently offer. We believe that our Commerce Media Platform is transforming the way marketers use digital advertising and are currently strengthening our offering and expanding our business, always focused on driving trusted and impactful results for clients.

We also continue to evaluate and execute on acquisitions, with a critical assessment on technologies and businesses that have the potential to accelerate our Commerce Media Platform strategy by enhancing, complementing, or expanding our strategic capabilities. These include our technology, marketing, monetization solutions, go-to-market, and R&D teams. Key criteria for acquisitions include demonstrated revenue traction and a proven value proposition for clients and partners and being easy to integrate. Our entrepreneurial culture, growth opportunity, global scale, financial profile, strong brand, and market position enable us to attract potential partners and acquisitions.

- In May 2021, we acquired Mabaya, a leading retail media technology company that powers sponsored products and retail media monetization for major ecommerce marketplaces globally. This acquisition immediately enhanced our retail media capabilities to better meet the unique needs of marketplaces and marketplace sellers.
- In December 2021, we executed a purchase agreement to acquire IPONWEB, a market-leading Ad Tech company with world-class media trading capabilities, with the transaction expected to close in the first quarter of 2022. This strategic acquisition is expected to accelerate our Commerce Media Platform vision by adding scale,

complementary products, and stronger first-party data capabilities, further reducing our reliance on third-party cookies and other identifiers.

The chart below shows the product mix evolution of Criteo's business and the year-over-year growth in new solutions in fiscal 2021.

Our large and loyal base of clients and first-party publisher partners provide stability and positive network effects. As of December 31, 2021, we had over 22,000 clients and were working with thousands of direct publishers on both web and applications, in addition to our large global and local RTB¹ partners. As we continue to grow our client base, we also continue to grow the number of users who interact with our ads. These direct integrations on both the demand and supply side ensure access to data in privacy-compliant ways (that will also work in the future of addressable media) and growth of our data assets, enabling us to deliver even more precisely targeted and personalized ads, to further expand our publisher network and to generate a greater impact for our clients. We believe this cycle of self-reinforcing network effects will continue to fuel our business in the future. To that purpose, we can also rely on strong assets to ensure the continuity and development of our activities (summarized below and described in the next pages).

Key inputs and assets for Criteo:

Our clients: Our client base for Criteo Marketing Solutions consists primarily of companies in the retail, travel and classified verticals, which we refer to as "commerce companies" or "commerce clients" and includes some of the largest and most sophisticated commerce companies in the world. These companies range from large, global, diversified commerce companies to mid-sized regional companies. With Criteo Retail Media, we also serve consumer brand manufacturers, which we refer to as "consumer brands" or "consumer brand clients".

At the end of 2021, approximately 70% of our client relationships were held directly with the client, whereby there was no advertising agency or any other third party involved in our client relationship on the Criteo Marketing Solutions side of the business, whereas 50% of our Criteo Retail Media revenue comes from agencies.

- As of December 31, 2021, we served more than 22,000 clients.
- In each of the last three years, our average client retention rate, as measured on a quarterly basis, was approximately 90%.
- We delivered \$1.8 trillion targeted ads in 2021.
- We had exposure to over \$1 trillion in online sales transactions on our clients' digital properties in the year ended December 31, 2021.

Employees and Human Capital Management: We have a commitment to the well-being and success of our workforce, and our company is driven by our core values of "Open, Together, and Impactful". Attracting and retaining top talent is a key objective at Criteo, and we invest significantly in talent acquisition. We are committed to offering an environment in which employees are ensured equal job opportunities and have a chance for advancement. As part of our transformation, we have undertaken several initiatives to enhance our employee value proposition and experience, including the recent publication of our Culture Book, very flexible working practices, and the renovation of our main offices to offer attractive workplaces. Our compelling employee value proposition, competitive compensation packages, and vibrant culture are instrumental in our ability to attract and retain talent.

¹ Real Time bidding

Additionally, we strive to provide exceptional training opportunities and development programs for our employees. To assess and improve employee retention and engagement, we periodically survey employees, and take action to address areas of employee concern. In 2021, we carried out two employee surveys specific to COVID-19 concerns, soliciting feedback on a wide range of topics including well-being, productivity, and social connection with other employees. Employee health and safety is the top priority for Criteo. As described later in this report (see iv.1), we devote time and effort across all our locations to providing positive working conditions, work-life balance, and the healthiest office environment for our employees.

As a global technology company, we believe that a diverse and inclusive culture is the cornerstone for driving creative collaboration and sustainable change across the industry. As stated in our Diversity, Equity, and Inclusion policy, our mission is to sustain our focus on equity, and build stronger diversity through how we hire, develop, reward, and retain all talent at Criteo. We empower our employees to impact the industry, promoting diversity, equity, and inclusion in everything we do, delivering richer experiences for all. Our efforts to foster a diverse and inclusive workplace are led by a dedicated Diversity, Equity, and Inclusion leadership team who partner cross-functionally and leverage our seven active Employees Resource Groups ("ERGs") who engage with employees, support allyship and sponsorship to encourage community, and provide networking and safe spaces for all diverse groups throughout Criteo.

- As of December 31, 2021, we had 2,810 employees (total headcount), meaning 2,624 for the CSR scope.
- As of December 31, 2021, 41,3% were female (for the CSR scope).
- In 2021 over 26,789 training hours were delivered to our employees (CSR scope).
- In 2021, the global score for the employee engagement² survey is 74 (on a scale from 0 to 100).

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

- As of December 31, 2021:
 - our global infrastructure included over 40,000 servers through a global network of 11 data centers
 - storage capacity exceeding 624,000 terabytes and 6,590 terabytes of random-access memory
 - 153 tons of CO₂ emissions linked to data centers use (post offsetting efforts), among a total of 1,078 tons of CO₂ emissions (workplace, travel, infrastructure)

Research and Development: We invest substantial resources and development to conduct fundamental research on artificial intelligence, machine-learning models, to enhance the

² The engagement score is a combination for the positive answers to 2 questions: "I would recommend Criteo as a great place to work" and "How happy are you working at Criteo?"

algorithms in the Criteo AI Engine, develop new features and solutions, conduct quality assurance testing, improve our core technology, and enhance our technology infrastructure. Our engineering group is primarily located in research and development centers in Paris (France), Grenoble (France) and Ann Arbor, (Michigan, USA). With the expected acquisition of IPONWEB, we will expand our R&D engineering centers to include Berlin (Germany), and Moscow (Russia). We expect to continue to expand the capabilities of our technology in the future and to invest significantly in continued research and development and new solutions. We had 653 employees primarily engaged in Research and Development and Product as of December 31, 2021 (IPONWEB excluded).

- We had close to 700 employees primarily engaged in Research and Development and Product as of December 31, 2021.
- Research and development expenses, including expenses related to the Product group, totaled \$151.8 million for 2021.

Privacy, Data Protection, and Content Control

Privacy and data protection laws play a significant role in our business. The regulatory environment for the collection and use of consumer data by advertising networks, advertisers and publishers is frequently evolving in the United States, Europe, and elsewhere. The United States and foreign governments have enacted, considered (or are considering) legislation or regulations that could significantly restrict industry participants' ability to collect, augment, analyze, use and share personal data, such as by regulating the level of consumer notice and consent required before a company can utilize cookies or other tracking technologies.

Financial results:

- Revenue of \$2,254.2 million for the year ended December 31, 2021
- Contribution ex-TAC, previously called Revenue excluding Traffic Acquisition Costs, of \$920.8 million for the year ended December 31, 2021
- Net income of \$137.6 million for the years ended December 31, 2021
- Adjusted EBITDA of \$322.5 million for the year ended December 31, 2021

More information regarding Criteo's activities, governance, financial performance, and results for 2021 is available on the company's website for investors [here](#).

Our culture and values

At Criteo, we believe that the future is wide open, but we also know that great people, as well as great products, make that possible.

In 2021, we took a step back to define Criteo's culture as our company evolved and transformed. Overall, we were looking for a compelling answer to the question: "who are we?" — and that's how we created **Criteo's Culture Book**.

Our Culture Book is the backbone that holds all aspects of our culture, including what we do, how we live our values, through our Criteo employees, as well as our clients, partners, and future talents. It gathers all the work we did throughout our transformation and will enable everyone to understand who we are as a company. Criteo's Culture Book is available [here](#).

Criteo's values of **OPEN, TOGETHER & IMPACTFUL** were defined in 2020 based on the feedback received by nearly 2,800 employees.

- **OPEN** - We believe that open minds are great minds. We promote diversity in our thinking and in our culture.
- **TOGETHER** - We build together, accomplish together, celebrate together. We care for each other.
- **IMPACTFUL** - We do the right thing to create a sustainable impact for our clients, our market, and the people that we serve.

At Criteo, we strive to embody our values in everything we do and through our different communities — and above all through action to stand open, together and impactful.

In 2021, we demonstrated our **openness** through a wide range of global actions, for instance by celebrating Black history month with inspirational events, over the Criterable days (days dedicated to people with disabilities), or by creating a new community, the Parents Community. We also demonstrate openness by bringing in external opinions and experts throughout all these initiatives.

We also know that **together** we are stronger. Together we seek to minimize our impact on the environment through our partnership with the global NGO, Tree Nation. Furthermore, we celebrated Pride month by aligning our internal tools and systems to reflect our employees' preferred names through our "That's my Name" project (still ongoing), and by signing the LGBTQIA+ Charter with L'Autre Cercle, a French leading association for the inclusion of LGBTQIA+ people in the professional world.

With our three values being linked, we aim to be **impactful** in the way we do business. For example, Criteo has committed to full gender pay equity through our Pay Parity action plan. To strengthen this commitment, Criteo has formed a new partnership with 50inTech to raise awareness and support women tech leaders and therefore by becoming a signatory member of the Tech for Good Call. Finally, we have launched a new volunteering platform, GIVING by Alaya, to empower our employees to be as impactful as possible.

Further information about those actions is available in the next sections of this report. More information about our values can be found [here](#).

ii. Criteo's approach to Corporate Social Responsibility (CSR)

1. Presentation of Criteo's CSR approach

a. Main CSR risks and materiality analysis

Main CSR risks for Criteo

Criteo performed its first dedicated CSR risk assessment in 2018. We identified a list of relevant CSR-related risks based on benchmarks from our business sector, and interviews, which were conducted with internal stakeholders who work in CSR-leading departments. These

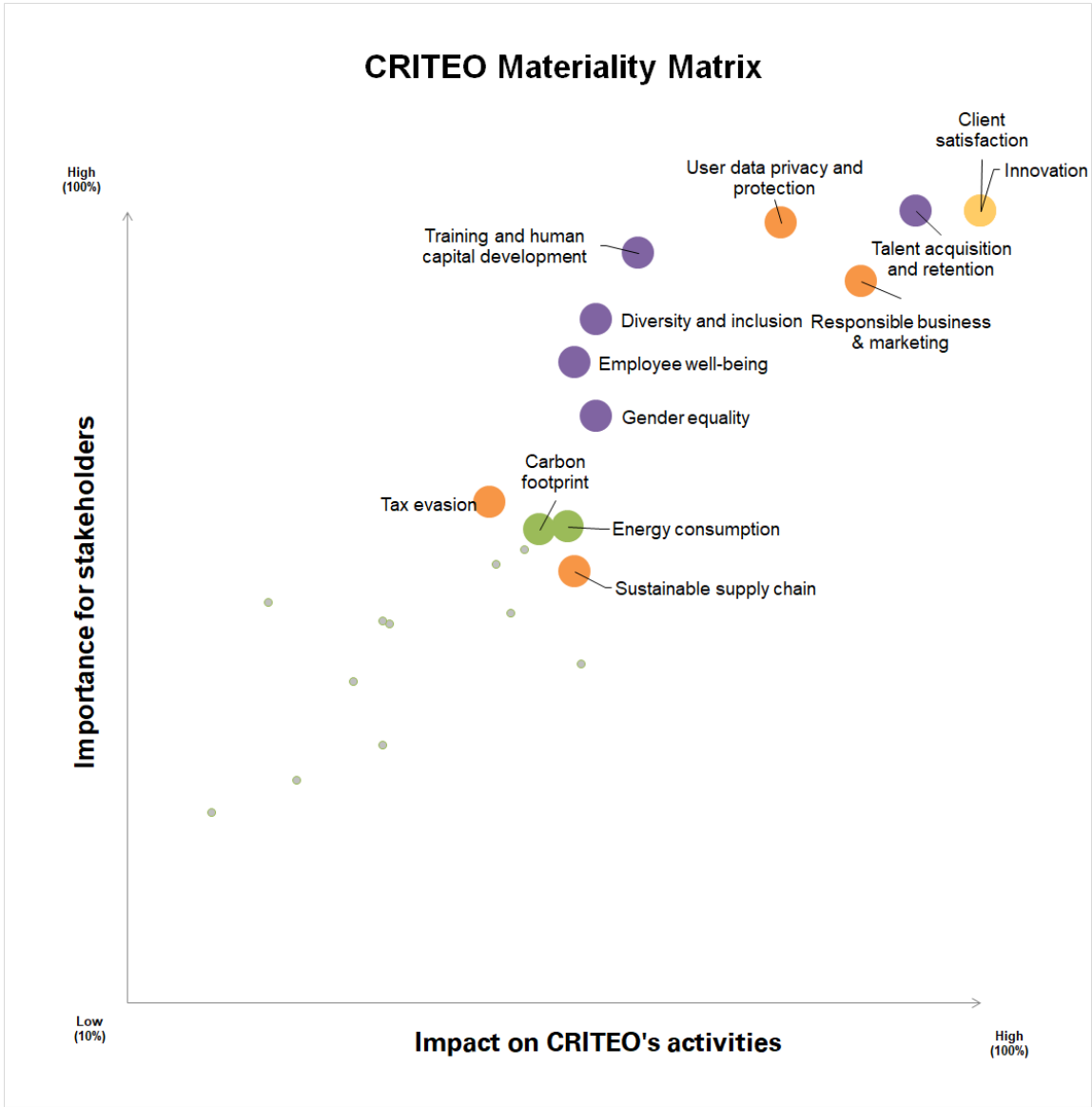
stakeholders assessed the risks in order to define a priority list of areas of potential impact. Based on this analysis, **Criteo selected eight main CSR risks³**.

In 2021, the alignment of the CSR risk mapping with the Enterprise Risk Mapping was reviewed by the Internal Audit & Control and Compliance teams.

Materiality analysis

Further, Criteo used the foundation established by the risk assessment to perform its first materiality analysis in 2019. We have **regularly updated the materiality analysis** since 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 those interviews and the risk assessment mentioned above, we establish annually our materiality analysis, presented below.



³ List of main CSR risks identified: Talent acquisition and retention, Training and human capital development, User data privacy and protection, Energy consumption, Carbon footprint, Supply chain, Gender equality, Inclusion and Diversity.

In 2021, **we also launched an online CSR survey for the first time** with the aim of better understanding our external stakeholders' expectations for Criteo in terms of CSR. This survey was answered by 34 stakeholders, amongst them clients, suppliers, publishers, investors, analysts, and agencies. The priorities they highlighted are mostly aligned with the results of our materiality analysis, the five topmost CSR issues 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
Talent acquisition, development, and well-being	Talent acquisition and retention	iii. 1-2-3
	Training and human capital development	iii. 4-5
	Employee well-being	iv. 1-2
	Inclusion, diversity, and gender equality	iii. 3; iv. 3
Relation with clients	Client satisfaction	vi. 2
	Innovation	iii. 4-5
Compliance and responsible practices	User data privacy and protection	vii. 2
	Responsible business and marketing	vii. 1-3-4-5
	Sustainable supply chain	vi. 4
	Tax evasion	vii. 3
Environmental impact	Energy consumption	v. 2-3
	Carbon footprint	v. 2-3

b. The three pillars of Criteo Cares, our CSR program

Our CSR program motto is "Criteo cares in everything we do". To guide our CSR program (called "Criteo Cares") and remain true to our culture and values, we focus our CSR efforts on **three pillars**: (1) **Diversity, Equity and Inclusion**, (2) **Environment**, and (3) **Tech for Good and Education**.

Pillar "Diversity, Equity, and Inclusion"

Our commitment to Diversity, Equity, and Inclusion (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

department supported by five of our communities, introduced later in this report (see section iii. 3; iv. 3).

- **Diversity** – Increase our efforts to attract, hire, develop, and retain diverse talent. Represent varied identities and differences, collectively and as individuals.
- **Equity** – Ensure equitable opportunities for learning, career, and compensation for all. Fair treatment, access, opportunity, and advancement for everyone at Criteo.
- **Inclusion** – Strengthen our culture 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 sections iii. 3 and iv. 3 of this CSR report.

Pillar “Environment”

Our environmental initiatives are carried out by our CSR department with the support of our Green Community. Criteo is currently working on the definition of an **ambitious environmental strategy and action plan** that will greatly reinforce our CSR strategy for the Environmental pillar. This will lead to a stronger global CSR roadmap with a core focus on the environment to improve our impact as a company. We want to set goals that make sense, that have a positive effect on our planet, and that we can all be proud of and will enrich our culture and echo our values.

More information is available in section v. of this CSR report.

Pillar “Tech for Good and Education”

Regarding our Tech for Good and Education pillar, our initiatives are carried out by our CSR and Public Affairs departments and our Education Community. We believe that we must give back to society. Through our talent around the world, we have a variety of expertise and skillsets that are recognized as among the best in our industry. We believe that through education to support future generations, we can improve livelihoods and develop thriving communities. Therefore, we **work with several mentoring associations** to support all types of profiles: young people, refugees, people in professional reintegration, etc.

More information is available in sections iv.3c., vi and vii of this CSR report.

c. Key 2021 results and objectives

In 2021, Criteo endeavored to formalize a set of **CSR objectives** aligned with the three pillars of our approach, in relation to the main projects and initiatives that we are currently carrying out or are planning to implement in the future.

The table below summarizes our CSR objectives as of 2021, which Criteo aims to review and improve in the coming years.

Pillar of the CSR program	CSR topics	Criteo's ambition	Target	2021 progress	Report section
Diversity, Equity and Inclusion	Global DEI Strategy	Define Criteo's DEI Statement	Have a DEI statement and Policy by 2021	Achieved	iv. 3
		Maintain good Inclusion scores	Inclusion Index (see section iv. 3) at 75% or above (Targeted culture questions focusing on authenticity, psychological safety, belonging, and inclusive leadership)	75/100	iv. 3
	Gender Equality	Increase the share of women in Management and Tech roles	Increase female pipeline with closer to 50% promotions globally (vs. 38% End of year 2020)	46%	iv. 3
			30% of women in tech roles by 2030	14% ⁴	iv. 3
		Ensure 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.	Criteo achieved pay parity in 2021. Ongoing	iv. 3
Environment	Environmental Strategy	Define an Environmental Strategy and Action plan	Have an Environment statement and Policy by the end of 2022	Ongoing	v.1
			Identify and implement actions to reduce our environmental impact by the end of 2022	Ongoing	v.1
			Measure the environmental footprint (at minimum carbon, scope 1, 2, 3) of our digital products and services by the end of 2022	Ongoing	v.1
	Data Centers and	Reduce the carbon footprint of	Offset 100% of the energy used by our	99.7% ⁵	v.2

⁴ Women in Tech means women in tech roles (developers, engineers, etc.) in R&D, IIT and Product teams. For 2021, the figures are (global scope):

- R&D - 56 females of 547 (10%)
- IIT - 10 females of 55 (18%)
- Product - 28 females of 65 (43%)
- Total - 94 of 667 (14%)

⁵ 0.3% remaining related to a new data center opened in 2021.

	Infrastructure	our Data Centers	data centers by the end of 2021		
		Reduce other environmental impacts related to our Data Centers	Start tracking data center water consumption by the end of 2022 (data centers and offices)	Data not available in 2021	v.2
	Offices	Reduce the carbon footprint of offices	Reduce our office's non-decarbonized energy consumption by 30% by the end of 2025 (compared to our average consumption in 2018, 2019, 2020)	non-decarbonized energy represents 80% in 2020 and 70% in 2021. Ongoing	v.3
	Events	Reduce the environmental impacts linked to our events	Offset all travel related to our annual internal company event	Ongoing (no events in 2021)	N/A
	Procurement	Reinforce sustainability criteria in our procurement processes	Set up a partnership with a Supplier Sustainability Rating Platform and start rating key vendors on CSR by the end of 2022. Criteo would also be rated as a company.	Data not available in 2021	vi.4
Tech for Good and Education	Employee skills	Provide access to training for our employees	At least 95% of active users have completed at least two training sessions on our learning platform within the year	94%	iii.4
	Ethics	Train employees regarding compliance and ethics	At least 80% of employees to have completed the Compliance (Code of Conduct) training (over two years)	84%	vii.4
Transversal matters	Employee engagement through the Criteo Cares program	Increase employee engagement within the communities	Increase the number of members in each community by 30% in 2022 (compared to 2021)	ongoing	ii.2
		Raise employee awareness of CSR issues through the Criteo Cares program	Organize at least 30 CSR-related events per year	Achieved in 2021	ii.2
		Deploy the Giving	Have 30% of employees on the	25% in 2021	li.2

		platform by Alaya	volunteering platform by the end of 2022		
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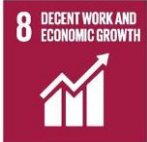



d. Contribution to Sustainable Development Goals


Criteo's activities have an impact on society and the environment, materialized through a wide range of programs for the company's employees, the infrastructure needed to deliver our services to clients, the nature and impact of our products and services, or relations with our stakeholders and other organizations in the tech industry.

Those impacts translate into **direct and indirect contributions to the Sustainable Development Goals (SDGs)** defined by the United Nations for 2030, an internationally recognized framework that is essential for building a strong and relevant CSR strategy.

Criteo's contribution to the UN SDGs, particularly towards SDG 4, 5, 8, 9, 10, 12, 13 and 17, is summarized in the table below:

Sustainable Development Goals	Criteo's contribution	Report sections
4. Quality Education  Ensure equal access to quality education for all and promote lifelong learning opportunities	<p>Internally, we are investing in educational and training initiatives that help our employees continually elevate their skills and create new career and growth opportunities, including Learning and development program (Learning Quest platform), Mentoring program, Voyager program, Internal promotion cycles, and Criteo Universities.</p> <p>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: people coming from disadvantaged backgrounds, ranging from high school students to refugees or people reintegrating professionally. In addition, we encourage community involvement with access to Volunteer Paid Days for all employees and a new volunteering platform was launched in 2021, called GIVING by Alaya, allowing our employees to support educational causes important to them (mentoring missions, skills sponsorship, etc.).</p>	iii.4 iv.3
5. Gender Equality  Achieve gender equality and empower all women and girls	<p>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:</p> <ul style="list-style-type: none"> - 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. - As a prominent member of the Tech for Good initiative since 2019, we committed to empowering staff from all backgrounds to fulfill their potential, achieving 30% of women in leadership roles by 2022, and 30% of women in tech roles by 2030. - Women@Criteo Community is an inclusive Employee Resource Group promoting the advancement of women in the workplace at Criteo and in our industry through initiatives such as training and coaching, networking, and mentorship. 	iii.3 iv.3

	<ul style="list-style-type: none"> - Our commitment to Diversity, Equity, and Inclusion extends to everything we do at Criteo, as highlighted in our DEI policy. This is a journey, and a focus we will continue to strengthen over time under the leadership of our SVP, DEI who is sponsored by our CEO herself. 	
8. Decent Work and Economic Growth  <p>Promote inclusive and sustainable economic growth, employment and decent work for all</p>	<p>We strive to promote respectful, safe, and inclusive work environments wherever we do business:</p> <ul style="list-style-type: none"> - The health, wellness, and safety of our workers 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, as highlighted in our Human Rights policy here. 	iv.1-2-3 vii.
9. Industry, Innovation, and Infrastructure  <p>Build resilient infrastructure, promote sustainable industrialization, and foster innovation</p>	<p>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.</p>	iii.4-5
10. Reduced Inequalities  <p>Reduce inequality within and among countries</p>	<p>With 88 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 every day, we are focused on reducing inequality through several programs, for instance:</p> <ul style="list-style-type: none"> - Our "Black, Indigenous, and People of Color (BIPOC) Community" promotes initiatives to fight against racial inequalities and racism. - Our Global Disability policy (available here) ensures our "Criterable Community" is also focused on improving the experience of employees who have disabilities at Criteo. 	iv.3
12. Responsible consumption and production 	<p>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 (available here).</p> <p>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.</p>	vii.1

Ensure sustainable consumption and production patterns		
13. Climate action  Take urgent action to combat climate change and its impacts	<p>We strive to minimize the environmental impact of our Data Centers by increasingly relying on renewable energy sources and increasing our compensation efforts.</p> <p>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".</p> <p>Lastly, in December 2020, we signed the Planet Tech'Care manifesto to promote Tech as an enabler of sustainable solutions. As part of this initiative, we are committed to measuring and reducing the environmental impact of our digital products and services.</p>	v.
17. Partnership for the Goals  Revitalize the global partnership for sustainable development	<p>We continue to partner with key stakeholders to promote initiatives that contribute to the UN Sustainable Development Goals for collective impact, for instance:</p> <ul style="list-style-type: none"> - Our partnerships with local charities (Article 1, Simplon) – Education and mentorship - Our volunteering and giving platform (GIVING by Alaya) – Social good - Our Tech for Good Commitment – Gender Equality - Our Planet Tech Care Manifesto Commitment – Environment - Our commitment with the French association L'Autre Cercle (signing the LGBTQIA+ Charter) – LGBTQIA+ Community 	ii.2 iv.3

2. CSR Governance and Reporting at Criteo

a. CSR Governance

Our CSR commitments, values, and pillars are **carried out at different levels of governance** within the company.

Since Megan Clarken joined Criteo as CEO in 2019, the two pillars regarding Diversity, Equity, and Inclusion, as well as Environmental Sustainability have become more formalized and fully embedded in the company's business strategy. In particular, **the DEI and Environmental Sustainability commitments, including Environmental, Social Governance and Corporate Social Responsibility are overseen by the Board**, and more specifically by the Nomination and Corporate Governance Committee⁶. In 2021, Criteo hired a **Senior Vice-President (SVP) of Diversity, Equity, and Inclusion** who reports directly to the Chief People Officer, under the official sponsorship of the CEO.

⁶ The Committee shall oversee the Company's strategy on global corporate social responsibility ("CSR") and environmental, social and governance ("ESG"), including evaluating the impact of Company practices on communities and individuals, to develop and recommend to the Board for approval policies and procedures relating to the Company's CSR and sustainability activities, and to develop and monitor ongoing compliance with the Company's CSR program and sustainability initiatives, including review of annual ESG disclosure issued by the Company.

The **Global CSR Manager** reports to the SVP of DEI and is in charge of coordinating all CSR and sustainability initiatives with the different teams in the field. Those teams effectively implement the key structuring of CSR-related projects with the oversight of the Executive Team. Hence, more than 100 people work with the DEI and CSR teams daily to reinforce our commitments and implement impactful actions.

In addition, we rely on different employee-led communities to bring new ideas to our strategic projects, enrich our roadmaps, communicate with employees and raise awareness internally. Those communities are active as part of our **employee engagement program called "Criteo Cares"** (see next section). They are managed by the Global CSR manager, and each of them benefits from the sponsorship of one or more members of the Leadership Team.

b. Stakeholders' engagement and Criteo Cares program

Relations with stakeholders

Criteo works with a **wide and diverse community of internal and external stakeholders** and maintains relations with each of them through dedicated resources and communication channels.

While this list is not exhaustive, our most important stakeholders include our clients and employees, as well as investors and shareholders, publishers, technology partners, suppliers, start-up networks, professional networks, and associations. More information regarding the way we engage with our key external stakeholders and partners is available in section vi. of this report.

As for internal stakeholders, Criteo drives a particularly ambitious CSR-oriented employee engagement program called **Criteo Cares**, described below, that aims to foster engagement, build pride within our teams, and reinforce our culture and values through concrete action.

Presentation of the Criteo Cares program

Criteo's own social responsibility program is called "Criteo Cares", mentioned in several sections throughout this report. This program's strategy and related initiatives rest on the three CSR pillars previously introduced: Diversity, Equity, and Inclusion, Environment, and Tech for Good and Education.

The mission of Criteo Cares is to leverage the company's unique assets for social and environmental good while fostering a diverse workplace culture where all employees feel they belong and are cared for. It was created in 2018 to bring together all local initiatives and coordinate all existing CSR actions across the company and maximize their impact.

Criteo Cares projects are **driven by seven communities**, also called **ERGs** (Employee Resource Groups):

- Women@Criteo Community
- Pride Community
- BIPOC Community
- Criterable Community
- Parents Community
- Green Community
- Education Community

These communities are led by thirteen active volunteers from various teams and different geographical areas and include hundreds of employees from around the world. Each Criteo

Cares community also has its own Leadership Group sponsor at executive level, as well as a dedicated internal website.

More information can be found regarding the actions driven by each Criteo Cares community in related sections throughout this CSR report.

Criteo Cares program KPIs	2020	2021
Number of Criteo employees who used their VPTOs⁷ days (at least 0,5 day)	24 employees (Approximately 1%)	58 employees (Approximately 2%)
Number of Criteo employees in the Criteo Cares community	Less than 400 employees	450 employees (Approximately 16%)
Number of employees who participated in CSR events organized through Criteo Cares	Not available	Approximately 18%
Number of donations made by the employees through the “Give Back” program on Spotlight	Not available	\$14, 940 USD donated (170 donations)

In 2021, the Criteo Cares program evolved with the **establishment of a new partnership** with **Alaya’s GIVING solidarity engagement platform**.

Through the GIVING platform, Criteo's employees are offered the opportunity to select solidarity projects or actions to be carried out in a wide range of fields. They are then directly contacted by the associations and can use their volunteer days in order to participate in the selected project. In parallel, Criteo has started to roll out **daily challenges** for employees on the platform. Criteo hopes that the GIVING platform will become an increasingly important part of employee engagement.

Alaya platform KPIs	2021 ⁸	Targets
Number of Criteo employees registered on the platform	709 employees (Approximately 20%)	At least 50% of Criteo employees have created an account by the end of 2022, to maintain or increase afterwards
Number of Criteo employees who took at least one action on the platform	104 employees (Approximately 15%)	At least 65% of Criteo employees registered on the platform who have taken at least one action by the end of 2022, to maintain or increase afterwards

c. Process for elaborating the CSR report

This report is prepared through a standardized annual process that begins with the identification of the topics that we took significant action on during the year, and a review of

⁷ VTPO: Volunteer Paid Time Off. Criteo provides all employees with a maximum of 2 working days per year to participate in volunteering activities with local charities.

⁸ No data available before 2021 since the Alaya platform was implemented in this year.

the new topics we would like to address. At this initial stage we also review the additional indicators we would like to disclose, as well as other areas of improvement, for instance, the scope or the structure of the report.

We then organize a round of interviews with the internal contributors who will be best able to accurately describe the achievements made during the year. A draft of the CSR report is prepared based on those insights, sent for feedback to everyone involved. In parallel, data reporting is initiated with an update of our CSR reporting procedures and the Methodology Guide (a summary of which is available at the end of this report).

The final steps for the preparation of the report comprise the reporting of the consolidated full-year data, an audit of this data and of the overall report by an independent third party, and the final review and validation of the CSR report by internal proofreaders.

This CSR report is prepared in accordance with the European Directive 2014/95/EU and takes into account leading non-financial reporting standards such as SASB (see SASB concordance table in Appendix 1).

We are also working toward improving the contents of the report in line with stakeholders' expectations on climate-related disclosure, so that it will be fully aligned in the future with the Task force on Climate-Related Financial Disclosures (TCFD) recommendations and Carbon Disclosure Project (CDP) requirements.

iii. Investing in headcount and talent initiatives

Criteo operates in all corners of the globe and has 27 offices⁹ across the Americas, Europe, Middle East and Africa (EMEA) as well as Asia Pacific (APAC). Over the last 16 years, we have kept our talents growing, which means investing in our current 2,810 employees or recruiting new headcounts to support our ambitious transformation. In order to do so, we believe that our strong culture and values, proudly embodied by our employees, will support us in growing our community.

1. Headcount

As of December 31, 2021, **Criteo had 2,810 employees globally**. Compared with 2,617 at the end of December 2020, Criteo's workforce increased during the year 2021 (an increase of 7%). This figure includes all of Criteo's active employees on December 31 (permanent and non-permanent employees).

The workforce-related figures presented in this report **only refer to Criteo's largest global legal entities**, i.e. those with more than 50 employees. Legal entities that joined Criteo's financial scope during year N are included in the CSR scope in year N+1. As of December 31, 2021, the entities included in the CSR scope accounted for **93% of Criteo's total headcount**, i.e. **2,624 employees** (compared to 2,366 at the end of 2020).

Entity	2020			2021			Var.
	Women	Men	Total	Women	Men	Total	
Criteo S.A. (France, Headquarter)	273	634	907	269	606	876	-3%
Criteo Corp. (United States)	256	340	596	290	365	655	10%
Criteo Europa S.L. (Spain)	175	162	337	229	206	435	29%
Criteo Ltd (UK)	37	44	81	30	40	70	-14%
Criteo KK (Japan)	59	65	124	61	65	126	2%
Criteo GmbH (Germany)	44	44	88	35	46	81	-8%
Criteo Singapore Pte. Ltd. (Singapore)	39	26	65	34	25	59	-9%
Criteo France SAS (France)	54	52	106	58	59	117	10%
Criteo do Brazil LTDA (Brazil)	27	35	62	25	34	59	-5%

⁹ Including coworkings

- (13) EMEA - Milan, Madrid, Barcelona, Stockholm, Istanbul, Moscow, Amsterdam, Munich, London, Paris, Grenoble, Bordeaux, Tel Aviv
- (7) APAC - Tokyo, Singapore, Sydney, Osaka, Gurgaon, Beijing, Seoul
- (7) AMERICAS - New York, Miami, Boston, Chicago, Ann Arbor, Los Angeles, Sao Paulo

Criteo India Pvt Ltd. (India) ¹⁰	N/A	N/A	N/A	30	65	95	N/A
Criteo Korea Ltd. (South Korea) ¹	N/A	N/A	N/A	24	27	51	N/A
Total	964	1,402	2,366	1,085	1,538	2,624¹¹	11%

On February 1, 2021, the Criteo announced a plan to restructure its workforce across functions and regions to better align with the company's evolution.

As of December 31, 2021, the **1,085 women in our headcount represented 41.3% of the total workforce of 2,624 employees¹²**. Young people (below 35) account for the majority of Criteo's employees, which is to be expected in a high-tech company relying on a workforce with skills in the latest trending technologies.

Workforce breakdown by age	2020	2021
Under 25	120	144
Between 25 and 29	590	657
Between 30 and 34	766	795
Between 35 and 39	464	519
Between 40 and 44	244	289
Between 45 and 49	116	133
50 and above	66	87
Total	2,366	2,624

2. Recruitments and terminations

Attracting top talent is key at Criteo and we place great importance on the quality of our candidate experience at all times.

a. Continuous improvement of our recruitment processes

Despite the lasting effects of the COVID-19 pandemic, 2021 was an important year for us in terms of recruitment. Our company's values of **"Open, Together, and Impactful"** drive the efforts of our People team to attract and retain the best talents at Criteo.

In line with those values and aiming to continuously improve the quality of the hiring process, we pursued the rollout of our global roadmap for gender equality with our dedicated dashboard. (see section iv. 3) Addressed to team leaders, this dashboard enables them to

¹⁰ New entity in the CSR scope in 2021.

¹¹ Total headcount and Criteo S.A. headcount are not equal to the sum of female and male headcounts, since one of our employee is non-binary.

¹² Same as all headcount-related data that will be disclosed further in this report, this percentage is calculated on the CSR scope.

monitor the gender distribution in their teams quarterly (evolution of the workforce, number of women recruitments, etc.).

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

b. Competitive positioning: employer value proposition and culture

In 2021, as part of our business transformation and in light of the changes it brought for our employees, we focused on answering these two questions: What is our culture? And why work at Criteo, now and in the future? A compelling answer to these two questions is crucial to attract, engage, and retain the best talents and achieve our business goals.

Starting in March 2021, the People (HR) team worked with many employees across all teams and locations to define Criteo's **Employer Value Proposition**. We built our competitive positioning based on feedback collected from a diversity of backgrounds, from interviewing 118 Criteo employees in focus groups to conducting individual interviews with leaders.

Criteo's Culture Book was released in October 2021, in order to share what makes Criteo special with clients, partners, and future talents.

c. Focus on the R&D team

While talent acquisition is a major focus area across all teams in the organization, **we pay close attention to our R&D talents**, to whom we offer a tailored experience based on the market's expectations.

Criteo has made recruitment for the R&D team a high business priority, and for this reason, R&D recruitment is entrusted to a **specific R&D Talent Acquisition (TA) Team** that is working hard on researching, connecting, and attracting job candidates in order to convert individuals into job applicants. The R&D TA team partners closely with the Tech Hiring Guild, whose purpose is to continually evaluate and ensure a robust process for the assessment of technical skills as part of the hiring process.

Some initiatives to improve candidate experience are conducted as part of the Diversity, Equity, and Inclusion actions for the R&D team (see section iv.3 for more details).

Criteo's Campus Program for R&D

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

The Campus Program recently diversified its approach by **increasing the focus on schools and universities where candidates present more diverse profiles, both socially and ethnically**. Due to COVID-19 restrictions many events planned for this year were unfortunately cancelled. However, where possible, Criteo participated in virtual campus events to maintain its relationships with schools and to continue hiring interns for its R&D teams.

In addition, through continued partnership with certain schools, Criteo was able to coordinate remote internships throughout 2021. A Campus Program specialist has also been hired to focus on this topic and will start in February 2022.

d. Hires and terminations

In 2021, 770 employees exited the company and 943 were hired across the globe.

New Hires & Terminations	2020	2021	Var.
New Hires	502	943	88%
Terminations	670	770	15%
Employee's initiative	390	527	
Employer's initiative ¹³	174	128	
Other (e.g. end of fixed-term contract)	106	115	

We closely **monitor our attrition rate** and put in a strong effort to better understand and reduce it as much as possible. For instance, we have built a database to analyze the reasons for departures. Those analytics are making it easier to predict attrition rates depending on geographic areas and populations. More importantly, they enable Criteo to adjust human resources accordingly to Criteo's business needs.

We have launched multiple actions focusing on career development for managers to better address employee needs for career opportunities and for employees to drive their career, especially in a hybrid context. Our Hybrid Work policy has a positive impact on retention with employees' increased desire to stay post COVID-19 pandemic.

3. Compensation & benefits

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

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

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

In 2021, annual base and variable salary compensation payouts for the legal entities included in this CSR report were € 222,742,522 – a 2% increase compared to €218,263,950 in 2020 (CSR scope).

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

However, due to the structure of our smaller teams and to the specific technical profiles sought after in some positions, we sometimes observe some salary gaps across populations depending on gender, age, etc.

In 2020, a **comprehensive analysis of salary levels across Criteo was undertaken**. The purpose of this analysis was to assess the competitiveness of an employee's base salary compared to

¹³ Including redundancies and restructuration.

the market salary for equivalent positions, as well as to improve our understanding of the potential residual differences in salaries between men and women.

This compa-ratio led the Compensation and Benefits team to identify that in 2020, a gap¹⁴ existed between the salaries of men and women. Upon this finding, Criteo made the decision in 2021 to react immediately and dedicated specific budgets to bridge the gap between the alignment of a woman's and a man's salary with that of the market where discrepancies had been noticed. This corrective measure was **designed to support the Pay Parity Action Plan and was conducted successfully: the gap has been reduced to 0% today.**

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 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 comprises the following areas:**

At hiring:

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

At merit cycle:

- Ensure balanced performance rating distribution per gender
- Ensure average increase is balanced between female and male employees

At promotion & mobility:

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

After a leave of absence:

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

As per French regulations, we disclosed our **Women-Men Equality Index for France** again in 2021 – which reaches **89 out of 100** (89 out of 100 in 2020, 92 out of 100 in 2019). We also disclose a **breakdown of Criteo's executives' compensation**, which is available in the company's Proxy Statement [here](#).

In addition to compensation, **employee benefits are also a pivotal point** in the very competitive Tech industry and a key component for talent recruitment. Criteo thus puts a strong emphasis on making progress on the multiple aspects of employee benefits. Some of the major topics addressed by the Compensation & Benefits Roadmap include:

- **Secondary care parental leave** was extended in 2020 from two weeks to four weeks in all countries where Criteo is located. It is offered to all secondary parents, regardless of their gender or marital situation, in line with our core Inclusion and Diversity principles.
- In terms of **health insurance**, Criteo endeavors to be as competitive as possible in every country where it is located by providing more than required by the law. For example, in India, we added in and outpatient coverage for parents, telehealth, and vaccination. In Singapore, we implemented a second health plan to provide more flexibility on how our employees can spend their health care and wellness funds. These actions were undertaken

¹⁴ According to our 2020 compa-ratio, the gap was of 2.8%, in favor of men, once the gaps that could be attributed, for instance, to different local market salary levels were accounted for.

in response to employees' interest in such measures.

Lastly, in the course of 2021, one additional day of paid leave was granted to all employees in order to thank them for their sustained commitment during the COVID-19 crisis.

4. Skills Management & Development

We continuously invest in our people development programs, both in terms of resources and organization as well as processes and experiences. Those efforts demonstrate the importance of talent growth and management. In particular, specific trainings were organized in 2021 on the below topics, and will be presented later in this chapter:

- Commerce Media Platform Masterclasses
- Top talent program "Leadership journey"
- "Manager @ Criteo" program
- DEI/Wellbeing: launch of a pilot program + Unconscious Bias learning path
- Hybrid Work Model
- Peer-to-peer and social learning practices
- Launch of a new Learning Management System (LMS)

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

- **Instructor-led trainings:** "Live trainings" and "virtual classrooms" where:
 - Live training refers to trainings delivered face-to-face by an internal or external trainer.
 - Virtual classrooms refer to virtual trainings delivered by an internal or external trainer via Zoom.
- **Online trainings:** Trainings autonomously followed by employees through digital learning platforms.

a. In-class training 2021 highlights

The main activities carried out for in-class trainings in 2021 are presented in this section.

- **Commerce Media Platform Masterclasses:**

As we move forward with transforming our offering into the world's leading Commerce Media Platform, we believe it is important for Criteo employees to understand our industry, our strategy, and the direction we are taking. In 2021, we have worked on the design and delivery of training on our industry landscape, our strategy, and our solutions.

The training consisted of e-learning for all Criteo employees and workshops for commercial teams. All Criteo employees have been trained on Ad Tech fundamentals, identity & Privacy, Measurement, Retail Media and other topics related to our industry and strategy. Commercial teams participated in workshops delivered by industry specialists to support them in becoming industry experts. This knowledge will help them build trust-based relationships with customers as well as build relevant and impactful solutions and go-to-market processes to ensure a successful rollout and client satisfaction.

- **Top Talent Program "Leadership Journey"**

The Top Talent Program named "Leadership Journey" was launched in 2021 to focus on Top Talent development. From June 2021 to early 2022, 28 participants followed a full training

program, including workshops, learning expeditions, e-learning, individual and group coaching. We aim at launching a second group in 2022.

The main objectives of this program are to build leadership capabilities, to accelerate the business effectiveness and success, to create development and growth opportunities, to expand Criteo community & network and to foster Criteo culture, values & key behaviors.

- **Manager @ Criteo:**

In 2021, Criteo started the design of the Manager@Criteo program for all managers. In the frame of this program, e-learning modules have been created on the following main topics: Leading Change, People Development, Lead with Vision, Coaching, Managing Performance, Talent Reviews. In addition, workshops have been delivered by Life Lab Learning on topics such as people development, managing hybrid teams, productivity, and prioritization. This program also offers managers the opportunity to be mentored by an external coach. A manager community has also been created to share best practices and ask for support, and two panel discussions have been organized on career conversations and managing hybrid team topics (240 managers enrolled).

- **DEI/Wellbeing:**

In 2021, to support our DEI strategy, we designed a learning path, "Understanding Unconscious Bias," which has been rolled out globally. The objective of this program is to build awareness and understanding of unconscious biases, to reduce their negative effects and help to be more inclusive in the workplace and improve the way we make decisions.

To support employees' wellbeing and address the fact that taking breaks remains a challenge for many, especially in this working remotely context, a pilot group has been launched with Headspace, a meditation application. Based on employees' feedback, this pilot has allowed for improved overall wellbeing, a feeling of decreased stress, and an increase in positivity, and an increase in breaks and disconnection which have a positive impact on sleep, focus, and performance.

- **Hybrid Work Model:**

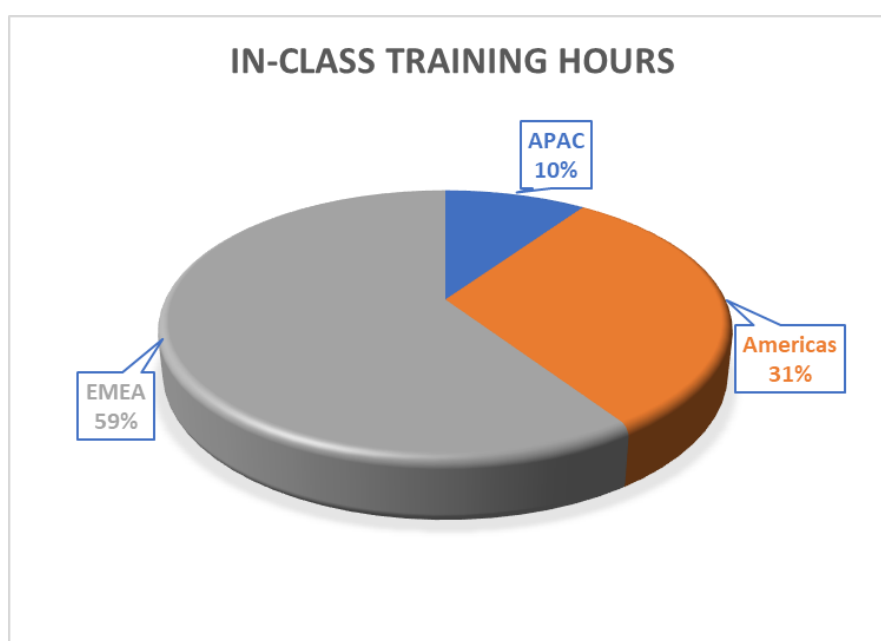
In order to support our employees navigating the new context of work and hybrid work, we have designed and rolled out an e-learning path "Successful Hybrid Work". Its aim is to support employees in thriving with new ways of working and equip them with tools to better organize their workdays. This path allows the employees to understand Criteo's vision of hybrid working.

Through this path, employees can prepare for hybrid work by being inclusive and by considering their wellbeing in this environment.

Although this report focuses on formal training activities, whether instructor-led or online, much **more is happening in the field and the offices 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.

In-class training hours

IN-CLASS TRAINING	Training hours	Including hours backed by evidence	Average training hours per employee	Average training hours per trained employee	% of trained employees	Number of training sessions	Average number of sessions per employee
2021	10,107	5,822	3.9	6.2	62%	302	0.1
2020	16,249	12,205	6.7	9.9	67%	507	0.2
% evolution	-37.8	-52.3	-42.5	-37.3	-5.0	-40.4	-50



The decrease in in-class training hours in 2021 can be explained by two main reasons. First, the decrease in our Learning & Development team. This impacted our ability to deliver a high quantity of virtual workshops, either delivered by an L&D partner or by external providers. The second reason is the growing demand for e-learning solutions, especially for our biggest learning projects. We have reinforced our digital learning offer to keep up with the increasing demand from the business and employees. This has been possible thanks to our new learning platform named "Learning Quest" which offers a great learning experience to our employees. This increase in digital learning delivery allowed us to deliver the same amount of learning hours to our employees compared to 2020, all Criteo entities considered.

b. Online trainings 2021 highlights

The main online training activities carried out in 2021 are presented in this section.

One major project was the launch in April 2021 of a **new Learning Management System (LMS), internally called Learning Quest**, to refresh the way learning was shared with employees at Criteo. The platform was widely adopted, especially due to the creation of many new e-learning/blended programs that enabled many employees to access the trainings. A key benefit to bringing on this new platform is that most of our training workshops/events registered there, which allows for a single-entry point for users and better reporting on training completion.

More information regarding this platform is available in section 4.d. below.

Other key online trainings activities in 2021 include:

- **Growing usage of LinkedIn Learning:**

After 18 months of implementation, we reached an 84% activation rate of the LinkedIn Learning platform for our employees. This activation combined with the increasing number of hours spent online for self-development shows how important digital learning has become, especially in the context of the current remote working situation. We are now embedding digital resources in most of our Learning Paths.

- **Leveraging Coursera primarily for Tech topics:**

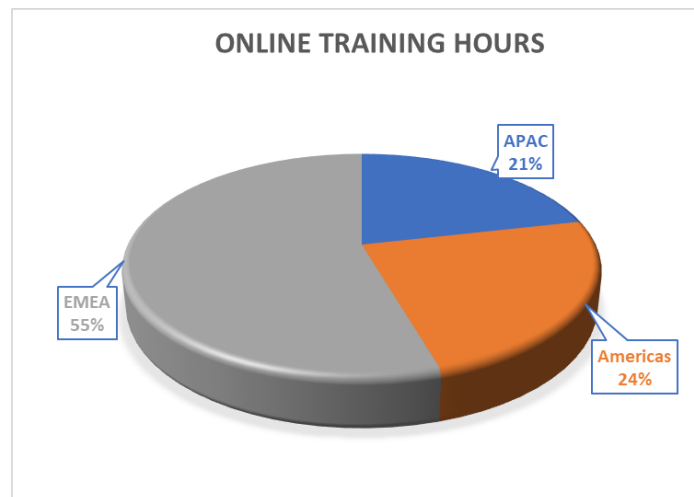
Criteo fully switched to unlimited Coursera licenses for those who need it, such as the Commercial teams and Tech teams like R&D. This still accounts for an important share of the company's online training hours.

- **Commerce Media Platform (CMP) Masterclasses:**

An ambitious program was built and rolled out this year to answer the growing need for employees to understand the basics of Criteo Business and the Ad Tech Industry. With five modules already launched (a total of 2.6 hours) that support employees in understanding the company and the landscape they work in, this program is one of the highlights of 2021. Surveys have shown great feedback on the CMP Masterclass Program, with an average rating of 4,3/5 so far.

Online training hours

ONLINE TRAINING	Training hours	Average training hours per employee	Average training hours per trained employee	% of trained employees
2021	16,681	6.5	6.1	105%
2020	14,063	5.8	6.7	87%
% evolution	18.6	11.4	-7.9	18.0



On top of the core online training hours reported above (skills development-driven), employees have completed further online training. This represents about 2,536 hours and covers Compliance modules (25% of these hours), FlyCriteo On-boarding modules (70%), CRM (4%) and digital literacy on collaboration applications (1%).

c. Peer-to-peer and social learning practices

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

In 2021, **Learning & Development partners have leveraged the Criteo communication tool Slack to create communities before each workshop** to encourage participants to share their knowledge and their best practices.

A panel discussion called “**Manager circle**” has also been organized for managers to learn how managing a hybrid team is different from being fully remote or at the office, to understand the opportunities and challenges of hybrid management and to gain practical tips on how to optimize work and collaboration in the hybrid context.

Because of the COVID-19 pandemic, some initiatives launched in 2019 that should have been continued in 2020 and 2021 were suspended. We instead focused our priority on addressing more urgent matters, such as ensuring the continuity of training in a remote working environment. We hope improved conditions in 2022 will allow us to revive some of the initiatives launched in 2019.

Peer-to-peer learning opportunities are also spread widely across the company through key global events such as **Criteo Universities**, further described in section iii.5.

d. Improving training delivery methods and tools

In parallel and following an RFP (Request for Proposal) launched in 2020, a **new Learning Management System (LMS)** was rolled out at the end of the first quarter of 2021. The new LMS, called “**Learning Quest**”, replaces the previous one Learning Zone, and allowed us to reinforce and broaden the types of available training contents for all employees.

In terms of training strategy, Learning Quest aims to:

- **Foster engagement** by spreading trainings across all Criteo's teams with mandatory and specific optional training paths. All training paths can be expanded with new trainings over time.

- **Bring visibility and knowledge to employees**, especially those not directly related to core business activities. The trainings were developed in response to identification and expression of a real need for more knowledge by a significant number of employees.
- **Improve data tracking** for all available contents, and so progressively replace the Global Learning Tracker.

Following the implementation of this new LMS, a **new mandatory training program** common for all employees has been deployed already in 2021. This mandatory training program will, on the one hand, **allow employees to familiarize with the Commerce Media Platform**, and on the other hand, **provide knowledge about Criteo's strategy and Tech fundamentals**.

By December 31st, 2021, the two first mandatory trainings courses entitled "Our strategy: The future is wide open" and "Digital Advertising & Ad Tech fundamentals" reached respectively 80% and 66% completion rate.

The mandatory training program will be expanded over time, with new training courses that all employees will have to complete.

As mentioned earlier, **this new LMS also facilitates data reporting** and makes it easier to track completion rates of different training programs as well as the level of employee engagement through the platform (98% of employees are connected to the new LMS, 89% of employees have been active on the platform)

Since 2018, a **common training tracker** called the "Global Training Tracker" was used by Learning & Development Partners and the Product Training Team for monitoring In-class training sessions. In 2020, **this Global Learning Tracker was strengthened** with quarterly reporting using regional tracking Excel files. Due to the unique sanitary context, attendance sheets were also replaced by extracts from the Zoom system to assess the attendance of participants. In 2021, from the launch of the new LMS "Learning Quest" in Q2, almost all the in-class training sessions have been tracked through this new platform. The Global Training Tracker is still used for several training sessions, which are not yet customizable in the LMS.

Lastly, our **onboarding program for newcomers** has also seen some improvements in 2021. In an effort to make the program more fluid and accessible, the live welcome sessions were reviewed and are now lighter, making room for a reinforced digital program. The onboarding program was upgraded into a fully remote onboarding program, leveraging new formats, trainings, and activities for new joiners to feel comfortable and find their places in their respective teams and in the global organization. These adjustments were in part made possible thanks to the new LMS.

5. Events

a. Annual event for all Criteo's employees

Criteo usually hosts an annual seminar for all its employees. Unfortunately, due to the sanitary context, this year's "Kick-off" event was held virtually.

The 2021 edition was named "**Criteo WOW**" (for Criteo Wide Open World) and we had the opportunity to organize "**Criteo University**" sessions. These are 45-minute lectures proposed by Criteo's employees (volunteers) to deepen a subject directly related to the company's activities. A few days before the event, Criteo employees can sign up for the sessions they prefer from a list of sessions covering various topics. Some examples proposed in 2021 include:

- How to be a Criteo Brand Ambassador
- The importance of mindfulness for working parents
- Solution Selling on the DSP

- How your behaviors shape our culture of belonging
- Publisher Content Analysis
- Hybrid Work Model – The philosophy, what does it mean and what does it include?
- The Future of Addressability
- Online Identity & Privacy: the battle for the open web
- Agora, Criteo Audiences in Tomorrow's World
- Criterable Community
- Retargeting through Cohorts
- Learning how to Learn

The sessions reached outstanding attendance with more than 2,000 employees registering for the different sessions.

b. Hackathon

At Criteo, we are open to different ways of thinking, new innovations and new ideas.

Our “**Hackathon**” aims to foster innovation across our teams globally and is one of the oldest and greatest traditions at Criteo. Every year, hundreds of employees get together for the opportunity to innovate and collaborate, get out of their comfort zone, learn new skills and bring their projects to life. The “Hackathon” provides the support and flexibility needed to turn employees' ideas into reality. For instance, the teams entering the event are offered special mentoring sessions in order to help them excel in their presentations.

Even COVID-19 could not stop our passionate employees. For the 2021 Hackathon we welcomed 299 participants from 21 offices, who submitted 46 projects in all.

As in 2020, the event was fully virtual, but offered a different atmosphere. Criteo set up a dedicated platform that was more user-friendly and encouraged closer cross-country and cross-continent collaboration, while virtual pizza lunches and a cartoon artist brought the teams together, bringing more camaraderie and festivity to the event.

Although Criteo employees were not able to cheer on their colleagues taking part in the Hackathon, we ran the **Public Vote Favorite** system set up in 2020. It was important for us to engage the audience, and this gave them the opportunity to vote for their favorite project and win some prizes — all the while learning about the amazing projects at Criteo.

It is also worth noting that there were **several Sustainability or DEI-oriented projects submitted** during the 2021 edition. In fact, one of these projects, *Eco-friendly Ads*, was awarded the bronze medal of Public Vote Favorite, an indicator of how meaningful these topics are to Criteo's teams. To reduce the event's environmental impact, participants were also given the option of whether or not to order event swag.

iv. Wellbeing, inclusion and diversity at work

Employee health and safety is a priority for Criteo. We devote time and efforts across all locations to provide a positive employee experience, work-life balance, and the healthiest office environment for its employees. **In 2021, our top priority remained the safety of employees, as continuously reaffirmed by Criteo's CEO Megan Clarken** throughout the COVID-19 pandemic. Keeping the health of our people across all our locations at the center of our priorities, Criteo continued implementing several measures in 2021 to support them in facing that exceptional situation in the short term, but also anticipating longer-term consequences.

1. Safety and wellbeing at work

a. Management of the COVID-19 pandemic

As in 2020, 2021 was a particularly challenging year worldwide with the management of the COVID-19 virus. For global businesses such as Criteo, the pandemic is a multifaceted challenge. Of course, the health of our employees was and still is our primary concern, including their wellbeing when working remotely in possibly complicated or stressful conditions. Following the pace of the pandemic, we continuously adapted to the ever-changing country-level measures (e.g. countrywide lockdowns). More than ever, communication with our people proved essential to address everyone's concerns and propose adequate solutions.

While the COVID-19 situation in 2020 resulted in office lockdowns, 2021 presented different but equally important challenges with the **opportunity to gradually reopen our workplaces**.

Our offices started reopening at the beginning of the year with an acceleration from May onwards. In order to ensure a safe return to offices, a **worldwide COVID-19 roadmap** was set up and made it possible to make tailored decisions depending on the regions/countries where Criteo operates.

This roadmap, approved by the Leadership team and shared with all the employees in April 2021, was composed of **three distinct risk phases**: red, amber, and green. Each risk phase was determined by a set of location-specific factors (e.g. formal government guidance, office preparation, return-to-work training completion rate), which allowed Criteo to make the most appropriate and transparent decisions in each location. Throughout the year, **regular risk reviews were conducted by the Criteo Leadership team**, and the current status of each location was shared with employees. Where getting back to the office was authorized (amber and green status countries), employees were asked to book desks through a dedicated tool in order to meet office capacities (amber countries) and analyze their new working habits.

Simultaneously and while offices were gradually reopening, Criteo announced during the year that the **"work from home" period was extended until June 2022, at the earliest**. The aim of this measure was to offer employees who so wished for the possibility of continuing to fully work from home without pressure.

In the wake of the COVID-19 pandemic, Criteo created a **specific program to ensure employees would still be able to work in the best conditions possible**. We partnered with an external firm to provide psychological support, a partnership which is still active today (see section d.). This specific program also includes financial support of between \$600 and \$800 (depending on locations) for each employee to buy suitable equipment (screens, ergonomic chairs, desks, etc.) for teleworking.

Lastly, the onboarding program is now completely redesigned and adapted to welcome new

joiners remotely through the new Learning Management System called Learning Quest (see section iii. 4 related to Training).

Throughout 2020, **communication with employees regarding the COVID-19 situation was essential** to Criteo and remained so in 2021. The COVID-19 **Steering Committee**, created in February 2020, is composed of representatives from all our geographies and functions. This Committee is still active in 2021 and continues to communicate to employees on a weekly basis.

Criteo carried out **two new surveys in February and September 2021**. As with the previous surveys, the purpose was to obtain feedback on employees' current feelings and concerns, to identify measures that have been well-received and to know what could be improved in terms of new working habits. These surveys tackled a wide range of topics, from well-being to productivity to social opportunities with other employees.

With respectively **76% and 81% response rates**, both surveys received very high response rates from employees.

The results of the September 2021 Hybrid Working survey show that **Criteo is improving in terms of employee well-being compared to the February survey, with scores reaching respectively 76% and 64%**. The general sense of wellbeing is relatively high compared to other companies. Indeed, **86% of employees feel that Criteo is genuinely concerned about employee physical and mental wellbeing and 96% feel well informed on the topic of COVID-19 and Hybrid Working**. The additional ergonomics support put in place also received very positive feedback and helped employees to deliver their best work and feel well- **79% of them feel well equipped** in terms of tools and knowledge to successfully work in a hybrid world.

Lastly, in the wake of the pandemic and following up on the numerous requests made by employees and the results of the surveys, Criteo continued thinking about ways to improve its policies in relation to new working habits in 2021. This includes finding new ways of ensuring a good work-life balance for employees as well as adaptation of our offices to meet new ways of work expectations.

Criteo's new **Hybrid Working policy** was thus announced internally in December 2020 and a first version of it came into effect as of January 1st, 2021. This policy has been reviewed over the course of 2021 based on new input from employees. It was communicated to employees and will go live in 2022 when the COVID-19 situation has sufficiently improved. The global Hybrid Working Policy and guidelines will be interpreted and applied in accordance with all applicable laws, and to the extent this policy conflicts with or is inconsistent with applicable law in any respect, applicable law will take precedence over this policy.

b. Safety at work

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

Launched in 2019, the **Health & Safety Management System (H&S MS)** project was completed and approved at the end of 2020. It has been rolled out in 2021 on a global scale.

The main aim of the H&S MS is to establish a **global standard across the Group in terms of safety norms in offices** (fire protection, etc.). This HS management system was established based on an assessment of H&S related topics, local standards and practices in each of the countries where Criteo is located, retaining the strictest criteria as the Group's standard.

In addition, each workplace has named a H&S referent in charge of implementing Health & Safety tasks. H&S referents have received specific training regarding their roles and responsibilities.

In 2021, the Global H&S Manager introduced a new **H&S Management System Tool**, a platform where to store all H&S related documentation and data. This tool is managed by the Criteo H&S referents.

The H&S Department supported the business **issuing two new policies in 2021**: the “**Lone Workers Policy**” and the “**Roles & Responsibilities Policy**”. The first policy is to give guidance to Employees and Managers when alone in the office, suggesting best practices to prevent accidents and keep them secure. The second policy defines all roles and responsibilities within the H&S structure. This created more clarity and consistency among all involved departments (Workplace, People, H&S teams).

The H&S Department also supports the COVID-19 Steering Committee, especially with the Ergonomics (work from home set up) and safety rules to be applied for each of the COVID-19 “risk phases”.

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

c. Work-life balance and employee wellbeing

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

Despite the COVID-19 pandemic, Criteo adapted the benefits to be possible virtually in 2021 (e.g. online events, FEEL GOOD program, etc.).

Most offices around the world provide standing desks to their employees without requiring a medical prescription or specific ergonomic seating, which requires a medical prescription. Based on individual needs, these special appliances enhance overall comfort in the workspace. In the context of generalized teleworking due to COVID-19, Criteo decided in 2021, as a follow-up of 2020 actions, to bear the costs of ergonomic seating and desks to ensure employees can work in the best conditions from home.

Criteo is also sensitive to the mental wellbeing of employees. While it can be difficult for people to open up about mental health concerns, Criteo has rolled out several initiatives to make this process easier for our employees and support them.

Criteo ran a pilot with 225 employees with a leading mindfulness and meditation app in 2021 and just decided to sign a contract with them to extend it to all employees globally to support wellbeing.

To ensure a no-stress environment at the office and at home, Criteo offers an employee assistance service across all countries. This free and confidential external helpline service can be reached 24/7 for advice and support on a variety of issues. In all countries, employees can also benefit from free counselling sessions, offered by an external provider and available in all local languages of our Criteo offices. The program also offers assistance in daily life matters, such as sourcing services like child and elder care, or legal or financial services.

Whenever a specific incident occurs that could have a negative impact on employees' mental health (such as the COVID-19 pandemic), our Criteo's People and Workplace teams create tailor-made solutions as soon as necessary in order to support them. In the case of critical incidents, the People Team coordinates with our employee assistance provider to offer individual and group support.

At Criteo we also try to provide help to employees where we can when they face personal

challenges that local regulations do not permit them to address. Criteo is striving to be as competitive as possible in every country in terms of health insurance, going beyond what national regulations might require.

An example of this is the **CARROT program**, which launched in the United States in 2021. This program is an employer-sponsored inclusive fund to pay for fertility treatments and family-forming services. It covers fertility education and assessments, fertility preservation (egg, sperm, and embryo freezing), in vitro fertilization (IVF), donor-assisted reproduction including gestational carrier services, and adoption, as Criteo's insurance does not offer financial support for such expenses. All permanent U.S. employees are eligible regardless of their gender, sexual orientation, single or couple status, etc. Criteo plans to extend the CARROT program globally to be available for all employees by 2023.

Since CARROT's launch, Criteo has committed to cover up to \$10K USD of care treatments and services per employee. The program has so far been received with considerable enthusiasm.

Lastly, two more measures were taken in 2021 to consider the changes brought by the pandemic in terms of ways of working, and how they impacted the typical workday for our employees with much longer periods of online presence required:

- In April 2021, Criteo **launched monthly "Quiet Fridays."** The first Friday of each month became "meeting-free" days, intended as an extra opportunity for employees to be able to work while disconnected. Criteo announced in October 2021 that this initiative would be made permanent, extending it beyond the COVID-19 pandemic.
- In May 2021, Criteo announced an **extra day off** for all employees on May 28th, 2021 in recognition of their hard work in the first quarter of the year, and as an opportunity to disconnect.
- Also, a learning path called "**Disconnection policy**" is now available on the new Learning Management System (LMS) for all employees

2. Employee relations

Communication and transparency are important areas of focus at Criteo.

a. Internal communication

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

Changes involving systems, processes or other issues impacting employees are communicated in information **sessions** to supplement emails on the topic, allowing employees to ask questions or raise concerns. In addition, many groups have Slack channels to communicate real-time updates and feedback to employees. Social media channels are also used to inform both external and internal populations.

For instance, **in 2020 we implemented an internal social media platform, Sociabble to inform employees in a more interactive format** (named internally as "CAKE" for *Connect and Keep Engaging*). **As of December 2021, 2 655 Criteo employees are connected to the platform, with around 90% of active users.**

A **global intranet** is also available, called **"myCriteo"**, gathering many functional portals to allow employees to easily access all information needed: People Portal, Global Shared Services Center (finance), Internal IT, Criteo Brand Center, Communications portal, Legal, R&D & Product Events, Criteo Cares (CSR program), Compliance & Ethics, Data Quality, Travel portal, Risk Management, COVID-19, Procurement, Transformation, Sales, Voices, Diversity, Equity and Inclusion, CSE Criteo (France only), Security, Health & Safety.

The **People Portal**, an HR intranet portal meant to allow employees to have easier access to HR-related information, policies, and contacts, including both global-level and country-level specific information, serves as one strong example of the internal communications accessible to employees. Since it opened in 2019, our "People Portal" has been very popular, and it was further leveraged since the beginning of the COVID-19 pandemic for communication to employees, providing a full section on COVID-19 topics to keep our employees informed.

Another example is the user-friendly ticketing solution that is **used by employees to ask HR-related questions** (policy, benefits, etc.). It is also used as an internal tool within the People team to allocate and track work between different teams. The service is well-used by employees with about 12,000 tickets logged by employees in 2021. Internal IT also proposes a similar user-friendly ticketing solution (4000 tickets logged in 2021) to assist employees with any IT-related questions/topics.

We also conduct other programs like **"Coffee Break with C-level"** where each member of the Leadership group invites a small group of employees - randomly chosen - to share a virtual coffee break via Zoom to ask questions and share with the C-level members (the CEO, CPO, CTO, etc.). In 2021, 428 employees had the opportunity to meet with our CEO for a "Coffee Break".

To allow networking among Employees despite the work from home context, Criteo continued in 2021 the **"Donut" program** launched in 2020: a matching system based on Slack channels, where two randomly chosen, employees are matched to share a virtual coffee together. It occurs every two weeks, alternatively at country level or at the regional level (EMEA, APAC, AMER).

Lastly, since the beginning of the COVID-19 pandemic, we reinforced internal communication by sending regular emails to all employees, giving them as transparent information as they need on the evolution of the situation and the health and security measures put in place. We also created a **dedicated intranet space to share all the information related to COVID-19**: security measures, ergonomics, well-being, work from home, office opening (etc.).

b. A culture of feedback and engagement

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

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

We also regularly give employees the opportunity to share their feedback on different aspects

of their employee experience in a more formal way through employee surveys. As one of the main initiatives, Criteo continues its partnership with Glint, which will support our employee listening and feedback strategy to focus on improving the employee experience.

Criteo regularly runs company-wide employee surveys to measure engagement over time and understand our strengths and areas for improvement. In 2021, we conducted one full engagement survey. This survey reviews scores from 17 questions and > 2000 qualitative comments left by employees. In addition, and as mentioned previously (see section iv. 1), we ran two COVID 19 and hybrid work surveys to understand the specific situation and needs of our employees during the pandemic. These surveys also included more general questions on employee engagement. In 2021, our overall engagement score is 74 on a scale from 0 to 100, matching exactly the external Tech industry benchmark. 77% of survey respondents recommended Criteo as a great place to work and 73% of respondents said that they were happy working at Criteo.

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

- **Manager (86):** the survey respondents declared that they would recommend their direct manager to others.
- **Authenticity (82):** the survey respondents confirmed that they feel comfortable being themselves at work.
- **Feedback (81):** the survey respondents said that their managers provide them with feedback that helps them improve their performance.
- **Wellbeing (76):** the survey respondents said that Criteo takes a genuine interest in their wellbeing.
- **Expressing Opinions (76):** the survey respondents said that, while at work, they felt comfortable expressing opinions that diverge from the group.

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

In 2021, Criteo did not roll out a manager survey as in previous years, but employees had the opportunity to provide feedback about their direct managers through the engagement survey. Based on the results, managers can identify areas for professional development. Every manager gets a detailed report of the feedback provided by their teams. Results are reviewed and action plans defined for managers with the People Business Partners.

To help managers and employees achieve their goals and empower them in a collaborative way, we provide all Criteo employees with unlimited access to the LinkedIn Learning platform (see section iii.4 related to Training).

Lastly, in 2021 we gave employees the opportunity to share their feedback on the COVID-19 measures implemented by Criteo again. Two COVID-19 and Hybrid work surveys were rolled out and the results are displayed in section iv.1 related to Health & Safety.

c. Employee recognition

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

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

The platform also allows us to recognize great actions performed for Criteo Cares or even to celebrate employees' Criteo anniversaries. **With an activation rate above 97%, the platform is a success** and is used across regions and departments. More than 37,000 recognitions have been received by Criteo employees in 2021.

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

With remote working, it's more important than ever to ensure employees are properly recognized on a regular basis for all the great things they achieve. In May 2021, we announced an extra day off for all employees on May 28th, 2021, in recognition of their hard work during the first quarter and as an opportunity to disconnect.

3. Inclusion, diversity and equal opportunities

a. Criteo's Strategy for Diversity, Equity, and Inclusion (DEI)

After a year rich in initiatives in 2020 when Criteo demonstrated that Diversity, Equity, and Inclusion are at the heart of our company's values now more than ever, we approached 2021 as a time to strengthen existing programs and realign our ambition and actions. This year was dedicated to **formally establishing the foundations of our DEI strategy and defining clear long-term plans**.

As stated in the 2020 CSR Report, our **new SVP DEI** joined Criteo in March 2021. This recruitment, one of the first decisions made by our CEO Megan Clarken, is intended to continue to reinforce Criteo's commitment to DEI. The Senior Vice-President of DEI is directly sponsored by the CEO office and works closely with Criteo's Human Resources Direction and teams.

At the same time, the **DEI team has continued to grow** with the arrivals of three employees in August 2021 as part of our "Voyager" internal mobility program (temporary assignment). Together with the Head of DEI and HR teams, they will help enforce Criteo's DEI strategy for eight months. The objective of the DEI team is to spread a day-to-day DEI culture, to develop a strong DNA within Criteo and to be the link between the employees' communities (Employee Resource Groups - ERGs) and the Leadership Team. In 2022, the DEI team will expand. We will create three regional program management roles (permanent roles), covering Americas, EMEA, and APAC respectively – reinforcing our efforts to ensure that DEI continues to be a priority throughout all our locations.

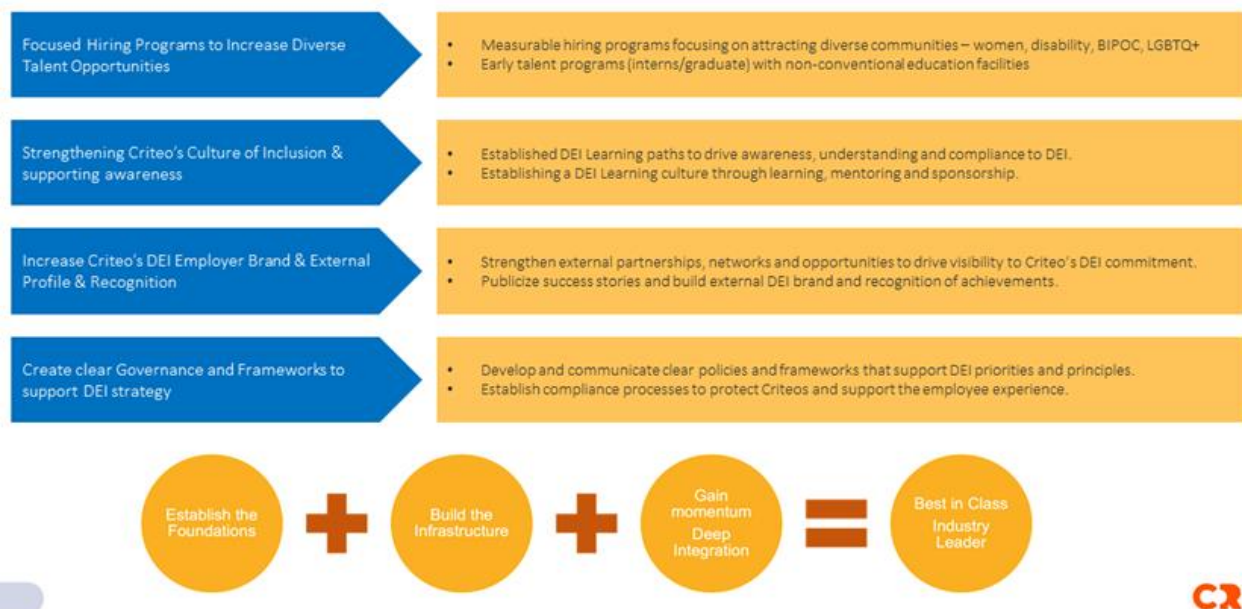
Many projects have been implemented and will be continued in 2022, but the following actions were especially important for the definition and implementation of our DEI Strategy:

- 1) Development and communication globally of our **Global DEI Vision and Commitments** available [here](#)
- 2) Definition of a clear **DEI Policy**, integrated into the global DEI Roadmap into the global DEI Roadmap

- 3) Development of **DEI Learning paths**, starting with Unconscious Bias training for all Criteo employees and Compliance training on Anti-harassment and Discrimination (see below)
- 4) Definition of a specific **Disability Policy** (see section d. below)
- 5) Strengthening of Criteo's Culture with the introduction of an **Inclusion Index** (see below)
- 6) Aligning with Criteo's seven **Community Groups** (mentioned earlier as "ERGs") to support allyship, sponsorship, and community support throughout our DEI culture (see sections below)

We ensured that our Global DEI Vision and Commitments are widely communicated internally (e.g. internal website, newsletters, Slack messages, Zoom events, etc.) and externally (e.g. Social media, partnerships, blogposts, [website](#), etc.), and are representative of Criteo's DEI culture and priorities.

DEI Roadmap



More information on Criteo's DEI vision and commitments is available on the company's website, [here](#).

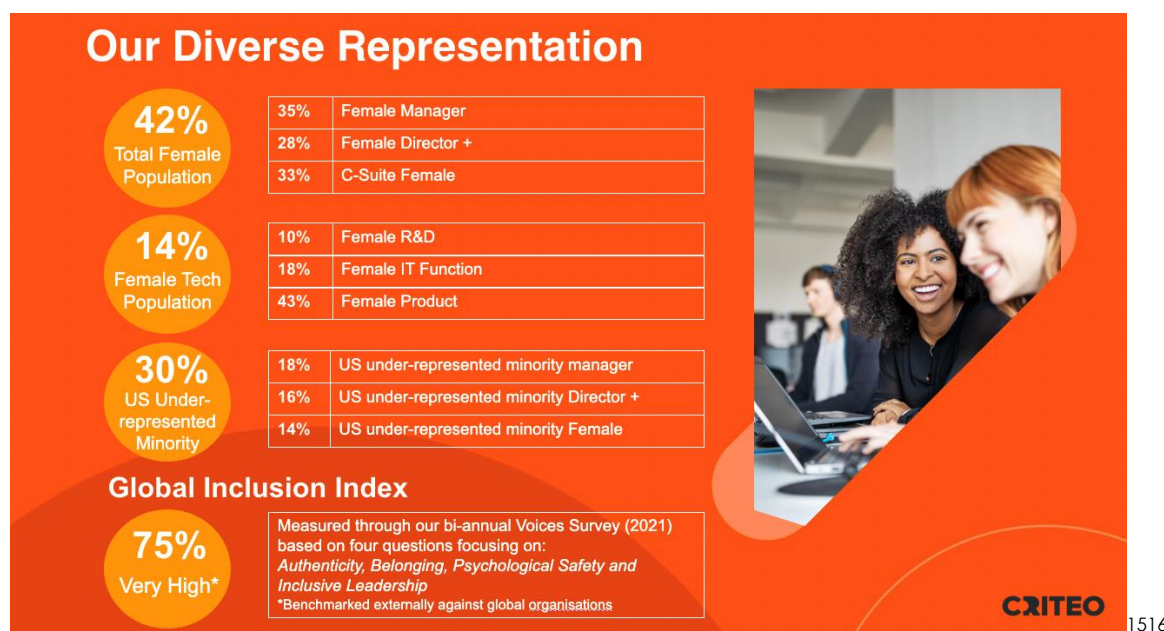
DEI Learning paths

In 2021, **specific e-learning trainings related to Diversity, Equity, and Inclusion** were developed globally. These trainings, available to all employees, aim at strengthening employees' commitment by providing them with a wealth of knowledge on DEI topics. Criteo's employees had the opportunity to gain knowledge with unconscious bias training. For instance, in the United States, employees have access to a compliance module dealing with Anti-harassment and Discrimination. We plan to extend Anti-harassment and Discrimination training to other countries in the first quarter of 2022 as a part of our annual compliance training agenda globally.

In 2022, we intend to invest in further DEI-related training and learning paths, focusing on training hiring managers as a first priority, reinforcing our commitment to strengthen our inclusive culture at Criteo.

Inclusion Index

In **2021 Criteo calculated its Inclusion Index** for the first time. This Inclusion Index was established based on employees' answers to four cultural questions focusing on *Authenticity, Belonging, Safety in Expressing Opinions* and *Inclusive Leadership*. It should enable Criteo to identify expectations, areas of improvement, and strengths in terms of DEI culture. For this first year, **Criteo scored 75/100**, a very good score that we aim to maintain for the coming years.



Returnship Program

Criteo started working in 2021 on a **Criteo Career Returnship Program**, specifically aimed at attracting external talents who are looking to return to the workforce. This program specifically targets people who have taken a career break (e.g. due to parental or caregiving reasons) and wish to return to the workforce with adapted work conditions.

The Returnship Program is being launched in February 2022 and will comprise a six-month support program which will include a new hiring process, dedicated onboarding, training and mentorship, as well as options for flexible working patterns and hours.

DEI objectives and targets

In 2021, Criteo also started working on **identifying key measurable objectives** that will drive our efforts toward building an inclusive workplace. Criteo already identified the following targets that the company wishes to track:

- **Inclusion Index:** drive continued improvement from current Inclusion Score through future surveys and maintain our Inclusion Index score at 75/100 or above.
- **Pay Parity:** continue to sustain pay parity with a bi-annual review of our global population, and thus preserve the long-term benefits of the Pay Parity action plan

¹⁶ Figures on this picture are rounded up.

activated in 2021 (see section iii. 3).

- **Female representation in Tech roles:** increase the ratio of female employees in our R&D teams to 30% by 2030.
- **Female Leadership:** increase female talent pipeline to achieve higher female representation into management and leadership roles, internally and externally through mentoring and internal development focus. Increase **female pipeline** with **closer to 50%** promotions globally (vs. 38% EOY 2020 and 46% EOY 2021).
- **Harassment/Compliance training completion rate:** achieve 100% "active" employee completion within 12 months of launch.

This work regarding our DEI objectives is essential to drive an efficient and impactful strategy. It is still ongoing and is intended to be continued in 2022.

b. Gender equality

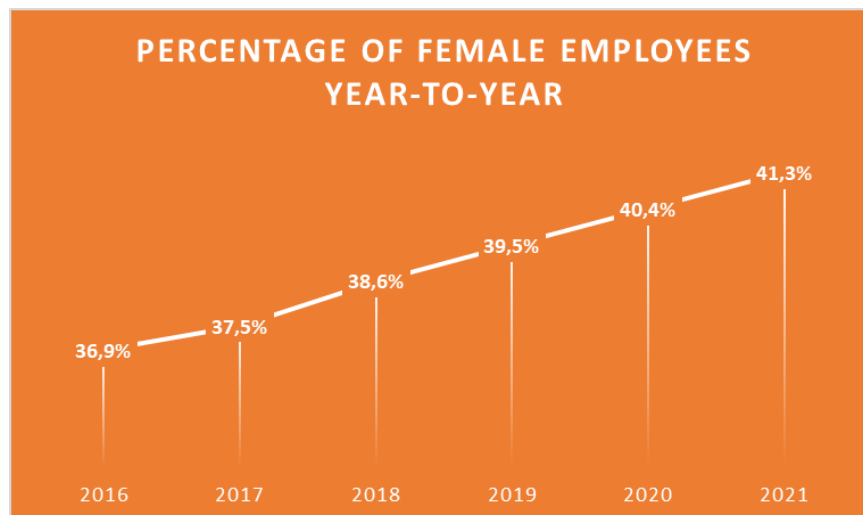
Promoting gender equality at all levels of the company

Criteo is taking steps towards gender balance and equality with an increase in female employees in 2021 in both the general population of employees, as well as manager positions.

Gender equality	Total employees		Managers		Directors and VP (Vice President)	
	2020	2021	2020	2021	2020	2021
Male	1,402 (59%)	1,538 (59%)	341 (69%)	340 (67%)	151 (70%)	167 (71%)
Female	964 (40%)	1,085 (41,3%)	153 (31%)	170 (33%)	66 (30%)	67(29%)
Total	2,366	2,624 ¹⁷	494	510	217	234

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

¹⁷ Total headcount is not equal to the sum of female and male headcount since one of our employee is non-binary.



Criteo aims to hire talent without gender discrimination and promote fair opportunity regardless of gender. In 2021, 44% of employees promoted were women, more than the share of women employees in the company (41,3%).

Our global roadmap for gender equality

Criteo is leading several gender equality initiatives that are part of a DEI global roadmap. In 2021, the following key actions can be highlighted:

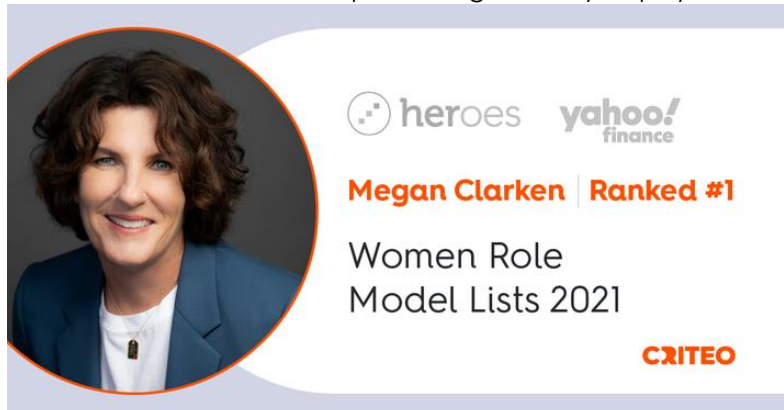
- The monitoring of the evolution of recruitments in terms of gender equality through **the global People Diversity Dashboard** that was launched in 2020. This dashboard allows the People Team to monitor the distribution of the workforce by gender and by age (evolution of headcount, recruitments, etc.) quarterly. It is aimed at better understanding and fostering diversity within the workforce.
- Each quarter we update our representation metrics following legally reportable criteria, and these are shared both internally and externally on our website and our DEI People Portal. These include global gender representation (total female, female managers, female directors, female Tech), and for our US-only population we report on representation of US Minorities or BIPOC (total US BIPOC representation, US BIPOC Managers, US BIPOC Directors, US BIPOC women). We have set goals for ourselves to reach the external benchmark for these diverse populations to ensure a continued focus on attracting, retaining, and developing our diverse talent at Criteo.
- In 2021, and as mentioned in the 2020 report, we continued to extend our **secondary care parental leave** for employees from two weeks to four weeks. All our employees across our locations worldwide are now offered this extended leave, often going much further than local regulations when it comes to leaving for secondary parents. In line with our DEI principles, it is now offered to all our employees who are secondary parents, regardless of the gender or marital situation.
- In France, a **gender equality agreement** was signed in 2014, renewed in 2018 and **renewed again in 2021 for three years**. It aims to build awareness around gender equality matters and is a warranty of compliance with the principle of non-discrimination. It promotes equal pay, equal access to training, and equal opportunities for career development and promotions. It also encourages diversity in recruitment processes. Several measures have been put in place by Criteo in order to achieve these goals, such as prohibiting unjustified pay differentials, increasing the number of promotions granted to women to 37% of the total amount of promotions awarded by the company, and increasing the proportion of women in all the different types of

positions and pay ranges by 2% per year in order to reach 38% representation in three years.

- We continued the **partnership with 50inTech, launched in 2020**, to raise awareness for and support women Tech leaders through skill development. We make sure to advertise technical positions to female talent and to encourage them through the recruitment process.
- Lastly, as a **signatory member of the Tech for Good Call**, Criteo made strong commitments for the improvement of women's representation in leadership positions. In 2021, Criteo reaffirmed its support for the Tech for Good Call led by French President Emmanuel Macron. As a prominent member of the Tech for Good initiative since 2019, Criteo intends to empower staff from all backgrounds to fulfill their potential and **achieve 30% of women in leadership roles by 2022 as well as 30% of women in Tech roles by 2030**.
- In 2021, Criteo won three DEI awards:
 - 2021 Diversity Award with France Digitale
 - 2021 Organization and Culture Award with the International Innovation Awards (IIA)
 - 2021 Diversity Champion Award and Inclusion Award
- Megan Clarken was listed as an honoree for Campaign US' Female Frontier Award for the "Leading the Charge" category.



- Megan Clarken also has been **featured as part of the HEROes 100 Women Role Model List for 2021** for her actions promoting Diversity, Equity, and Inclusion.



In addition, the **Women@Criteo Community** was relaunched in 2020, as part of our Criteo Cares initiatives (see below). We have revived our partnership with 50inTech in 2021 and have a new partnership starting in 2022 with Women who Code and Girls who Tech in Spain.

The Women@Criteo Community:

Women@Criteo is an inclusive community that aims **to transform and promote gender equality at Criteo**. The group's mission is to be a catalyst for the advancement of women in the workplace at Criteo and in our industry to promote equal access to all opportunities across our organization. Through initiatives such as training and coaching, seminars, open discussions, networking, and mentorship, Women@Criteo aims to engage, empower and inspire employees. 2021 has been another banner year for this community with **over 300 members, over 190 attendees at each event**, and increasingly ambitious outreach initiatives. Its leaders and ambassadors are particularly proactive and allow Gender Equality issues to have a strong voice at Criteo!

Focus: Actions taken by the Women@Criteo Community in 2021:

- **International Women's Week Allyship Roundtable** with our Executive Leaders! They discussed their experience with allyship and their commitment to fostering a culture of equality as inclusive leaders.
- **International Women's Week** kicked off with a great APAC/EMEA event with leaders.
- **International Women's Week - Coffee & Conversation with our CFO**. We learned about her background, her experience joining Criteo, as well as her thoughts on leadership and mentorship, women in the workplace and allyship.
- **International Women's Week – Fireside Chat with CEO**, Megan Clarken and our Chairperson, Rachel Picard talked about their career journeys, achievements and challenges, and the role of females advocating for gender parity.

Targets for 2022:

- Organizing 2 major global events per year (Achieved in 2021)
- Organizing 2 initiatives per year with other communities (Parents, BIPOC, Pride) (New objective for 2022)
- Having at least 200 attendees at each global event (190 attendees on average in 2021)
- Having at least 25% of Criteo employees in the community by the end of 2022 (10,5% as of Dec 31, 2021)

Inclusion of LGBTQIA+ people

When addressing gender equality issues, Criteo also considers the inclusion of LGBTQIA+ people in the company.

- **Partnership with "MyGwork"**: business community for LGBTQIA+ professionals, students, inclusive employers, and anyone who believes in workplace equality. Our partnership reinforces our commitment to offer an inclusive and authentic workplace, and allows us the opportunity to network, mentor, and build relationships both inside and outside of Criteo in support of the LGBTQIA+ community.
- **Inclusive Language Guidelines** established for all Criteo employees to focus on how we communicate internally and externally. Alongside this we are launching Inclusive Language Training available for all Criteo employees to attend.
- **Megan Clarken has won the L'Autre Cercle LGBTQIA+ Role Model Award** and signed the **LGBTQIA+ Charter with L'Autre Cercle**. Criteo has signed the **LGBTQIA+ Charter of L'Autre Cercle** a leading association for the inclusion of LGBTQIA+ people in the professional world. Through this signature, Criteo is committing to create an inclusive environment for LGBTQIA+ employees, ensure equal rights and treatment for all

employees regardless of their sexual orientation or gender identity, and much more.

The initiatives below are primarily carried out by our internal Pride Community.

The Pride Community

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

In 2021, the Pride Community set up many projects and events starting with the "That's my Name" project to reflect the names our colleagues want to be identified with, rather than their legal name.

Focus: Actions taken by Criteo's Pride Community in 2021:

- **"That's My Name" project:** This project allows all Criteo employees to choose the name they wish to be known by and have appear in the company systems and tools. We understand that the ability to use a preferred name is essential to feel welcome and included. It is a big step to keep creating a safe space for every employee within the company.
- **LGBTQIA+ and WORLD AIDS DAY Quizzes** – We asked employees to test their knowledge to raise awareness about inclusion. A major barrier to the visibility of minorities is that many people doubt that there are inequalities in the workplace. This was a great way to educate employees.
- Megan introduced the **'Welcoming Pride Month'** event for IAB UK. This conference brought together some great leaders for a look at how the digital advertising community can best support LGBTQIA+ people who work in the industry, and what digital platforms, publishers, and Ad Tech suppliers can do in Pride month — and year-round — to support the Pride cause.

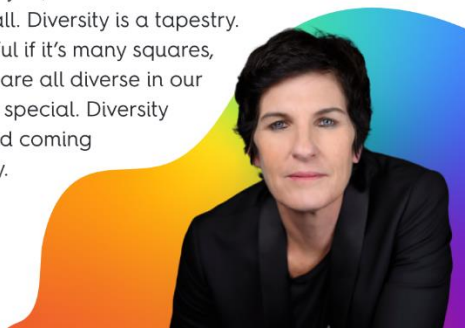
Targets for 2022:

- Having at least 200 people in the community by the end of 2022 (166 as of Dec 31, 2021)
- Producing 10 contents (such as guidelines, blogposts, articles, interviews) per year (12 initiatives in 2021)

"Diversity starts with you, and then it adds me, and then and all. Diversity is a tapestry. A tapestry is beautiful if it's many squares, when it's mixed. We are all diverse in our own way, we are all special. Diversity is accepting that and coming together in harmony. All of us."

Megan Clarken
CEO, Criteo

CRITEO



Parenthood support

Criteo is very happy and proud to announce that a new community was created in April 2021: the **Parents Community**. This new community demonstrates the continued commitment of Criteo and its employees to Diversity, Equity, and Inclusion.

The Parents Community was created following an internal initiative carried out by two of our employees. In particular, our employees who are already parents have expressed their desire and interest in creating a community. For many of them, their parenthood journeys may be accompanied by stress, fear, or questions. This community aims to support parents throughout their parenting journey, from the moment they discover their future parenthood to their return to work and beyond.

Focus: Actions taken by the Parents Community in 2021:

Created in 2021, the Parents Community started carrying out actions with:

- A **quiz regarding Child Bonding leave** in April to raise awareness about this topic.
- A **Kick-Off event** in May with the community leaders and their executive sponsor.
- A **session** during which a male employee shared his **experience** in building a family as a gay person living in Barcelona.

Targets for 2022:

- Organizing two awareness events per year (Achieved in 2021)
- Having at least 400 people in the community by the end of 2022 (220 as of Dec 31, 2021)

c. Social diversity

In 2021, Criteo continued to work closely with various organizations, aiming to increase focus on the most impactful projects. **The two partnerships concluded in France in 2020 were still active in 2021, with the organizations Article 1 and Simplon.**

- **"Article 1" and "Simplon"**: more than 15 volunteers from Criteo committed to actions with those two organizations in 2021. As part of the Article 1 initiative, our volunteers engaged in long-term mentoring (three years) to provide students from socially diverse backgrounds with professional training and resources. The Simplon initiative is aimed at helping students prepare for interviews and behave professionally through workshops or face-to-face meetings led by Criteo employees.

In addition, **a new volunteering platform was launched in 2021, called GIVING by Alaya.** Through this platform, our employees can volunteer to support causes which are important to them. This platform includes a wide variety of non-profit organizations to give our employees the freedom to use their VPTO (Volunteer Paid Time Off). Since 2018, each employee can take two days per year to engage in a mission alongside a local charity. In 2021, 58 employees used their VPTO days to give support to non-profit organizations. This new platform aims to centralize many causes offered to our employees. As such, a project to integrate the partnerships mentioned above is underway.

The Education Community:

Created in 2020, the Education Community is built on a rich legacy, with several historical actions and partnerships that were recently completed. Volunteers in the Education Community believe we can fight inequality of opportunities through education. **Our goal is to support and help the under-represented segment of the employment market:** people coming from disadvantaged backgrounds, unemployed, refugees, and women. We have different audiences – from high school students to refugees or people re-entering the professional world. In 2021, more than 15 volunteers from Criteo committed to actions with “Article 1” and “Simplon” associations, our three main partnerships. As part of the Article 1 initiative, our volunteers engage in long-term mentoring (three years) to provide students from socially diverse backgrounds with professional training and resources. The Simplon initiative is aimed at helping students prepare for interviews and behave professionally through workshops or face-to-face meetings led by Criteo employees.

Those partnerships are currently active in France, but in 2022, we intend to expand these actions in other countries, primarily the United States, with the support of our Education Community.

Focus: some of the actions taken by the Education Community in 2021:

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

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

Thanks to the feedback from our partnerships in France (see above paragraph), the Education Community, with sponsorship from Criteo's executive team, **recommends that Criteo extends these partnerships in 2022 and implement similar initiatives in the U.S.**

Targets for 2022:

- Having at least 200 people in the community by the end of 2022 (105 people as of Dec 31, 2021)
- Sending two Education and Giving Newsletters per year (Achieved in 2021)

d. People with disabilities

In November 2021, a **new Global Disability Policy** was launched at Criteo which will support more inclusive hiring practices. Criteo is committed to ensuring equal access and participation for people with all types of disabilities (either physical or mental, and visible or hidden). We are committed to treating people with disabilities in a way that allows them to maintain dignity, respect, and independence.

Our Global Disability Policy demonstrates 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.

In 2021, our People teams and our internal Criterable Community have worked on **initiatives to better include people with disabilities in the workforce**. The COVID-19 situation put a halt to some of those actions (particularly those linked to the workplace environment), but several initiatives were implemented in 2021, particularly **awareness-raising actions** such as:

- An **International Week of Persons with Disabilities** which was held virtually in November by the Criterable Community and the People Team (see below in the "Criterable Community" section).
- A new pilot training called 'Barrier Free Recruitment' was set up with our Talent Acquisition Team and Hiring Managers, focusing on removal of barriers and welcoming people living with a disability (hidden or visible).
- A **new training** was launched to smooth the recruitment process for disabled candidates named "Hiring people with disabilities".
- Criteo participated in **the Hello Handicap forum** (French recruitment forum dedicated to people with disabilities) **in May and October**.
- Following its creation in 2020, a **toolkit for managers** specifically addressing inclusion for disabled employees has been implemented in the Portal People in 2021. It aims to better welcome and support employees and is also available on the disability page on Criteo Cares internal website.

In the future, Criteo intends to increase the number of employees with disabilities in the workforce by working with specialized agencies and networks, as well as providing internal training and awareness to our talent acquisition and hiring teams on supporting more inclusive opportunities throughout the hiring and onboarding process at Criteo. We have a commitment to expand awareness globally through the engagement of our Criterable Community (ERG) at Criteo.

The Criterable Community:

The Criterable Community was initially created by a group of employees from the People team who believe we need to better take care of our employees with disabilities, whether they are visible or invisible.

It is now an open group composed of Criteo employees who discuss and act together to build a more accessible world for people with disabilities, wherever they are (outside or inside Criteo). We believe creating more awareness around people with disabilities is critical to create a more inclusive world and to become an even more inclusive company. The Criterable Community commits to improving the employees who have disabilities' experience at Criteo: we want to take action so that these employees can demonstrate the full capacity of their creativity, innovation, performance, success.

Some 2021 actions of the Criterable Community:

- **Two awareness campaigns with concrete actions:** actions such as the "Criterable quiz" and the "Did you know campaign" allowed Criteo employees to better understand people with disabilities, to become allies for them, and to share their

knowledge and educate their colleagues, family, and friends.

- **Critenable Day (May):** The community hosted an event with Team BRIT - a motorsport team – was held. Team BRIT aims to inspire people with disabilities, PTSD, and mental health issues, by demonstrating what can be achieved through motorsport.
- **International Weeks of Persons with Disabilities (November):** During these two weeks, a quiz, and some challenges to raise awareness about disability issues were put in place through our new platform, GIVING by Alaya. Moreover, a virtual event with D&A (Diversity and Ability) was held, along with another Team BRIT event to raise awareness about disabilities. Additionally, in France, the community welcomed two interns with disabilities (for a day) as part of the "DUODAY" initiative. The employees also organized a sign language workshop and two events with external speakers. At the same time, 15 employees took part in an "OPKDO" mission with Handicap International (via the Giving by Alaya volunteering platform).

Target for 2022:

- Having at least 250 people engaged in the Critenable Community by the end of 2022 (118 people as of Dec 31, 2021)

e. Inclusion for the BIPOC¹⁸ Community

In 2021, Criteo continued its involvement with the BIPOC Community. One of the key actions was to develop the network of leaders all around the world and 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**, to support helping young black professionals discover careers in advertising and media and encourage applications for open vacancies at Criteo.
- **Expansion of the BIPOC Community globally**, with the addition of an EMEA Community Leadership role to support more global awareness of race and ethnicity globally.
- **Additional support and training sessions** led by our Employee Assistance Program to support employees at Criteo during crisis events (such as the attacks on the Asian American Pacific Islander (AAPI) communities in the U.S. in 2021).
- **Criteo Cares community events** focused on awareness and allyship including cross regional keynote speaker panels, external panel events, Juneteenth celebrations, Black History Month events – welcoming anyone in Criteo to listen, participate talk about their experiences.
- **Introduction of key representation metrics assessed against U.S. industry benchmarks** to drive focus on continued improvement on US diverse community representation at Criteo.

Criteo will continue to heighten awareness internally to support its BIPOC Community and to reinforce the power of allyship to strengthen its culture of inclusion. In 2022, a DEI Program Manager for the Americas will also join the DEI team to specifically support the United States focusing on increasing opportunities to attract, retain and develop underrepresented minorities.

¹⁸ Black, Indigenous, and People of Color

The BIPOC Community:

The Black, Indigenous, and People of Color (BIPOC) Community at Criteo was inspired by the BIPOC [Project](#). We believe in the power of the community as we know that we are stronger together. Above all, we need to show solidarity and commit to fighting against racial inequalities and racism. 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 runs a book club, mentorship programs, and volunteer events to help us all learn and grow together.

Actions taken by the BIPOC Community in 2021:

- **For Black History Month:** The BIPOC Community hosted Grammy-nominated jazz drummer, Eric Harland. Eric joined the BIPOC Community for a fireside chat with the Executive Sponsor of the community and BIPOC leaders, answering some questions and talking about the state of jazz music. He ended the chat with a short performance. The BIPOC Community also organized a Quiz and a "Did you know" campaign to raise awareness.
- **To support our AAPI colleagues:** Since the pandemic started two years ago, the Asian American Pacific Islander (AAPI) community has suffered a series of violent, racist attacks in the U.S. and globally. Criteo wanted to speak up against the intolerable acts of hatred and violence towards the AAPI community and show solidarity and commitment to fighting against racism. Criteo created support sessions for AAPI employees in the U.S. and the People team is looking at long-term actions they can take to create a more diverse and inclusive workplace. In April 2021, the CSR team launched a donation matching campaign for Asian American Advancing Justice. All the participants donated nearly \$1,100 USD. Criteo matched their donation to Asian American Advancing Justice. **To celebrate Juneteenth in the U.S.** - also known as Freedom Day and Emancipation Day- the BIPOC Community organized a mixology class and a cardio dance Class.
- In October, our BIPOC Community celebrated **Hispanic Heritage Month and Black Movement**, similar to the annual Black History Month celebrations in February in the United States. This is an opportunity to recognize and support our BIPOC Community, and to understand and build our communities throughout Criteo as community members and as allies. To commemorate this event, Criteo invited three external speakers to talk about their own experiences as a part of the BIPOC Community. Dr. Kamel Hothi, TLC Lions Non-Executive Director, Hamou Bouakkaz, ex-Deputy Mayor of Paris, Suresh Raj, Global Chief Growth Officer for Virtue from TLC Lions talked about their own experiences, perspectives, and challenges that they have faced in their professional and personal lives. Whether in the United States, Europe or Asia, they gave an open and transparent perspective on their own race and ethnicity. This is a critical topic that Criteo wants to build more understanding and awareness around. The BIPOC Community also hosted a BIPOC Roundtable session to talk about unconscious bias.
- A Criteo University session took place in October to speak about **Black representation in media:** a conversation with an advertising association, followed by a BIPOC roundtable about unconscious bias in November with three colleagues to learn more about the issue.

Targets for 2022:

- Increasing attendance and engagement levels (no data for 2021)
- Having at least 250 people in the BIPOC community by the end of 2022 (154 people as of Dec 31, 2021)

In the future, we plan to continue to develop our actions for the BIPOC Community. For example, we are working to relaunch "Courageous conversations" about race and inclusion within the company starting in February 2022, following the great example set up by our CEO Megan Clarken on racial diversity. She wrote the article "Embrace Discomfort. Stand Together. Create Change" which was shared with all employees.

f. Non-discrimination and prevention of harassment

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

Consequently, Criteo applies its **equal opportunity policy** (also called non-discrimination policy) which strictly forbids all forms of discrimination, whether at the recruitment stage or afterward with regard to 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 88 nationalities are represented in Criteo's global workforce. It is therefore very diverse, with a strong mix of local talent and people from different cultures and backgrounds.

While the majority of our workforce is less than 40 years old (81% of employees), we are focused on our commitment to provide equal opportunities to all without discrimination on the basis of age, be it through external hires or internal promotions.

Hires and promotions of employees above 40 years old	2020	2021
- Share of employees over 40 years old in hires	8%	10%
- Share of employees over 40 years old in promotions	11%	9%

Criteo also recognizes the importance of freedom of speech for employees. Consequently, no discrimination is directed at employee representatives.

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

In 2021, **specific training was developed regarding unconscious bias and anti-harassment and discrimination, which** all Criteo employees are required to complete (see section a. DEI Learning paths).

v. Reduce Criteo's environmental impact

1. Criteo's environmental approach

At Criteo, we care about the environment and have long been working to reduce the impact of our activities on the planet. Accelerating the formalization of **our global long-term environmental strategy is one of our top priorities in 2022.**

As an important company in our industry, Criteo wishes to do its part and contribute to international efforts in curbing climate change and other environmental threats. This strategy will be built together with the Leadership team, the global CSR manager, and operational teams, with oversight from our Board of Directors, and will consider **best practices and recommendations from leading initiatives such as CDP¹⁹ or the TCFD²⁰.**

Until the sustainability strategy is more formally defined in 2022, Criteo continued its ongoing efforts to minimize the environmental footprint of the company in 2021.

The nature of our activities leads us to implement tangible actions such as management of the data centers and its data resources, promotion of green offices, and raising awareness among employees about sustainable practices that will prevent harmful consequences for the environment or society. More detailed information regarding these actions is available in the following sections.

Criteo also participates in leading initiatives carried out by the Tech industry that aim to better consider the environmental impacts of the sector.

One such initiative is the **Planet Tech'Care manifesto**, which Criteo signed with a French professional union in the digital industry²¹. This initiative brings together players from the French digital ecosystem who have committed to reducing their environmental footprint.

Additionally, since April 2020, **Criteo has been chairing the Interactive Advertising Bureau France (IAB France)** – our industry trade body. Within this engagement, working groups have been set up in Europe to **measure the environmental impact of digital advertising campaigns** and come up with solutions to **mitigate their inherent risks**. Criteo has been leading work with the IAB France to measure the carbon footprint of ad campaigns and IAB France will be delivering collateral in 2022 to harmonize industry standards regarding how we effectively measure our carbon footprint.

In fact, for some years now, Criteo has observed growing expectations from regulators and in public opinion in relation to the environmental impact of the sector. We have thus taken an active role in recent parliamentary discussions in France to promote cleaner standards and practices across our industry (including new open-source hardware and software requirements to increase the repairability and lifespan of equipment or tax rebates for end-of-life hardware that is being reused or redistributed). We will continue to engage with policymakers to encourage greener industry standards in Ad Tech in the months ahead.

Lastly, in compliance with the French law "PACTE Act"²², Criteo's shareholders approved the Company's request to modify the Company's by-laws to include that the Board shall consider

¹⁹ Carbon Disclosure Project

²⁰ Task Force on Climate-related Financial Disclosures

²¹ Syntech numérique

²² Plan d'Action pour la Croissance et la Transformation de l'Entreprise (Action Plan for the Growth and Transformation of Companies)

social and environmental aspects when defining the Company's strategic orientations. The amended by-laws went into effect in 2020.

2. Environmental impact of Data Centers and hardware

a. Energy consumption and GHG²³ emissions due to data centers

Criteo's operations rely on large Data Center units and several smaller networking rooms, also known as Points of Presence (POPS). POPS are similar to small-sized Data Centers. In 2021, Criteo had its servers installed in 11 Data Centers worldwide, all of which belong to external service suppliers. Among those 11 Data Centers, 9 are data processing centers, and the remaining 2 host network POPS. **Criteo's server infrastructure accounts for one of its largest environmental impacts.**

A team dedicated to capacity planning oversees **optimal allocation of infrastructure resources** according to business objectives. This means that human resources are dedicated full time to optimizing Criteo's infrastructure usage regarding costs and power usage.

Data Center rightsizing is a 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 being able to **respond to future business growth**. With the thorough machine refurbishing that has been performed in recent years, Criteo estimates that one new server in operation now does at least as much work as two previous ones: the new processors are answering twice as many requests per second for one watt consumed (QPS/Watt).

But beyond energy efficiency, the overall environmental footprint of the server infrastructure “from cradle to the grave” must also be considered when identifying the characteristics that will result in minimal environmental impacts. That is why Criteo has launched a **Carbon Footprint assessment covering the entire lifecycle of its Infrastructure** (see below for more information).

Results from this assessment will help us define the most sustainable approach. Meanwhile, the current policy is to extend the lifecycle of new servers as much as possible²⁴.

Criteo actively seeks to enhance **sustainable practices among vendors of services** (hosting and hardware recycling) as well as **hardware procurement**. For each new Criteo project, the company releases a Request for Proposal (RFP) to several potential partners, and one of the main criteria of the decision matrix is labeled as “Eco Responsibility”. This criterion encompasses various questions about the energy-saving processes, the source of energy of the Data Center, its Power Usage Effectiveness (PUE)²⁵, which shouldn't exceed a rate of 2, and other eco-related topics. The hardware devices we have today require open-source possibilities, to avoid software end-of-life limitations and increase hardware reparability, and spare part availability.

²³ Greenhouse gas

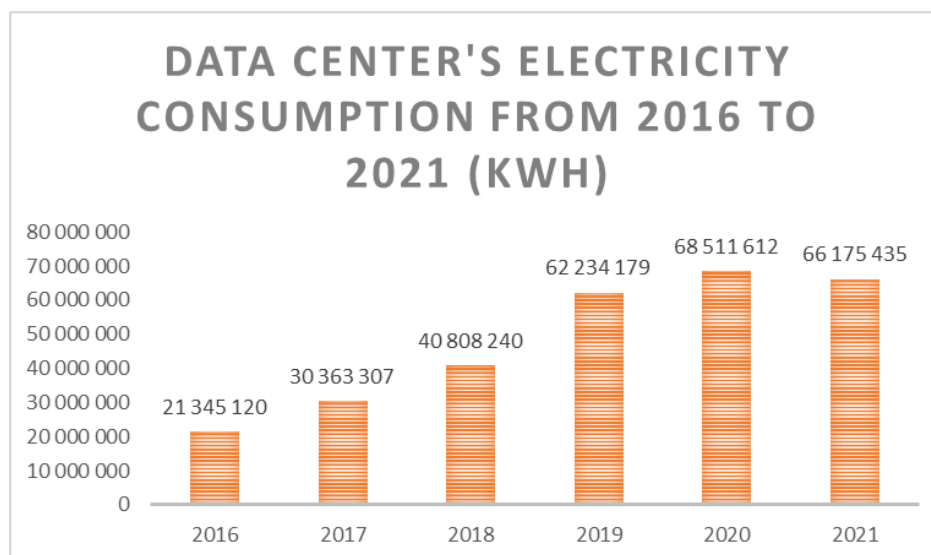
²⁴ See the dedicated paragraph about e-waste management

²⁵ 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.

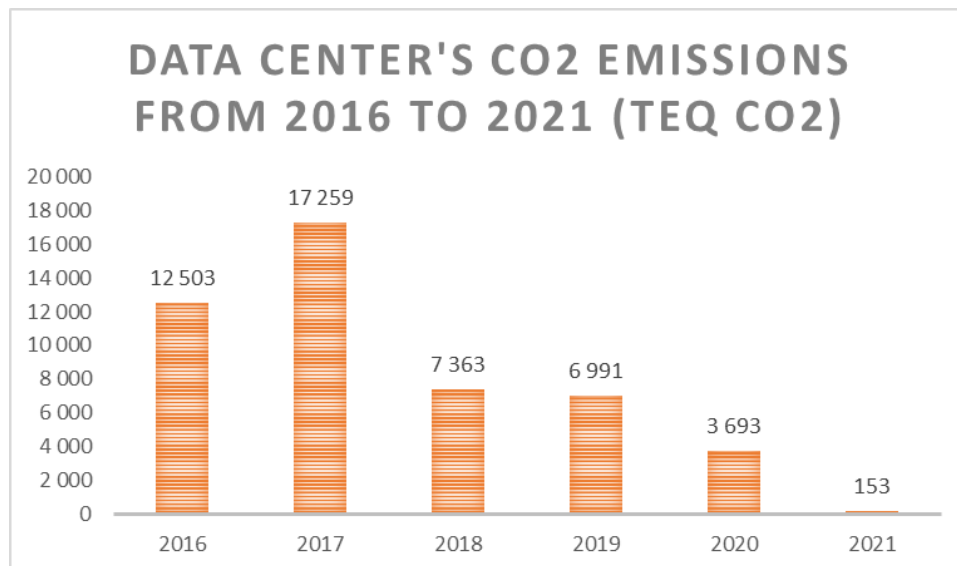
Electricity consumption and CO ₂ emissions in Data Centers (DCs)	2020	2021	Var.
Total electricity consumption	68,511 MWh	66,175 MWh	-3%
Share of electricity from renewable energy sources	91.7%	99.7%	+8%
Share of data-center consumption compared to total consumption (including offices)	95%	97%	+2%
CO ₂ emissions generated by data centers (post offsetting efforts) ²⁶	3,693 tCO ₂	153 tCO ₂	-96%

The evolution in Data Center electricity consumption in 2021 is because several locations were rightsized throughout the year, such as Japan and Singapore. Also, we aim at rightsizing other projects in Europe in the course of 2022.

While the **electricity consumption of Data Centers has increased** since 2016 (as a result of our activity growth), the related CO₂ emissions are controlled and have kept decreasing thanks to Criteo's efforts in reducing their carbon footprint (as shown in graphs below). As we are not able to supply Data Centers directly with decarbonized energy, we offset the carbon emissions by buying renewable energy certificates.



²⁶ 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).



As of 2021, **99.7% of the Data Centers' energy consumption is supplied from decarbonized sources or offset through certificates**. The remaining 0.3% comes from our new data center located in Singapore and for which the electricity purchased is not yet renewable. Since 2020, Criteo compensates 100% of the Hong Kong Data Center energy (which was not the case previously).

As mentioned previously, Criteo has been working since 2020 with a consulting firm to **perform a complete carbon footprint lifecycle assessment that covers all emissions on scopes 1, 2 and 3 for Data Centers²⁷**.

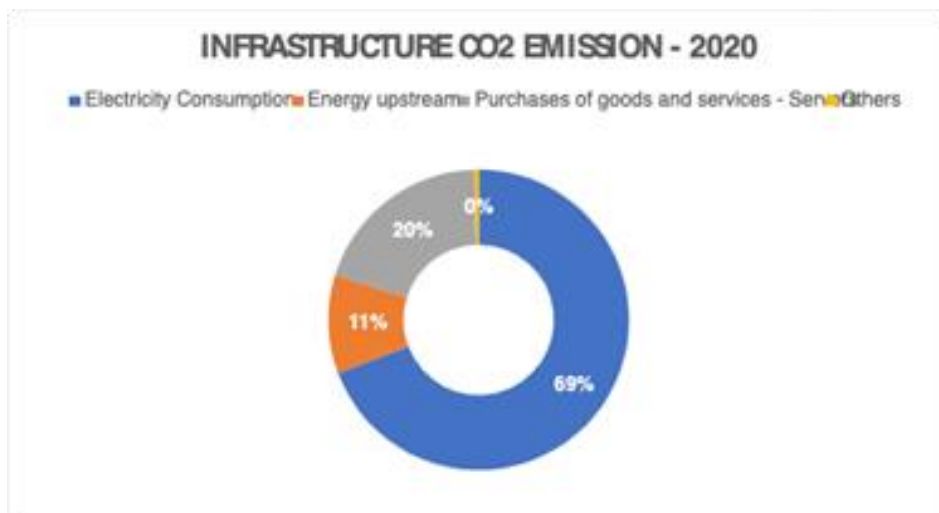
The main interest of this analysis for Criteo is to better understand the carbon footprint of the equipment purchased and the real impact of scope 3, thereby confirming the relevance of Criteo's strategy which is relying on Data Centers with the longest possible lifespan to cushion the impacts of manufacturing.

In 2021, the carbon footprint of Criteo's IT infrastructure was **evenly distributed between scope 2 (power usage) and scope 3 (manufacturing and end-of-life) with 75% and 25% of emissions respectively**. This confirms that Criteo should not only work on the reduction of the Data Centers' energy consumption and the use of renewable energy sources, but also on the optimization of scope 3 emissions.

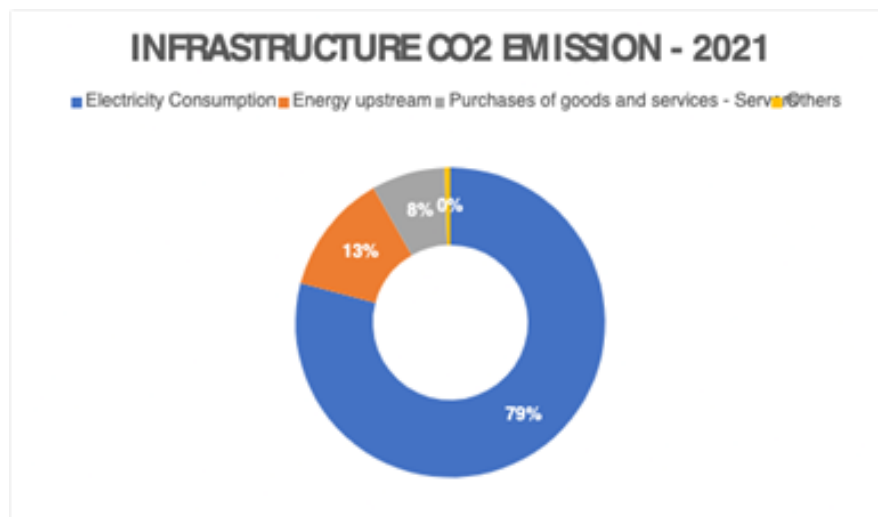
The emissions decrease observed in 2021 was a result of fewer server purchases during the year.

²⁷ The emission scopes correspond to three categories of greenhouse gas emissions depending on their sources: direct emissions linked, for example, to the use of fossil fuels (scope 1), indirect emissions linked to energy consumption such as electricity (scope 2), and finally other indirect emissions linked, for example, to the manufacturing and use of products (scope 3).

2020 data: 45 500 tons of CO2



2021 data: 43 000 tons of CO2



The scope of each emission category is defined below:

- Electricity consumption: the emission related to the electricity directly consumed by the data center during the year
- Energy upstream: the emission related to the energy required to produce electricity like exploration, drilling, and extraction
- 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, waste...

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.

b. E-waste management

Since 2016, in order to reduce the amount of e-waste²⁸ generated in the Data Centers, Criteo has asked for a guaranteed extension for servers from three to five years.

Criteo works with a subcontractor to handle decommissioned equipment, which is operating in all the cities where the company's offices are located except for Sao Paulo, Istanbul, and Moscow. The majority of this equipment can be reused and is resold on a second-hand market, while the remainder is considered as waste, which can be partly reused or recycled.

In 2021, 215 tons of assets related to infrastructure activities were decommissioned. Among these 215 tons, 206 tons of them were reused in other data centers or put back on the market. **Finally, Criteo produced 9 tons of e-waste, compared to 3 tons in 2020, due to infrastructure activities.**

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. As a result, **Criteo's actions allowed for the refurbishment of 452 kgs and the recycling of 4.08 tons of office e-waste** in 2021.

With regard to employee's hardware equipment, our new 2021 policy no longer forces the renewal of computers purchased from 2021 onwards (older devices were renewed in 2021 for safety and operational reasons). This reflects a more sustainable approach that lets employees change their equipment when they feel the need. Anyone can request a change of workstation after three years, but this will no longer be incentivized by the IT department. Employees who do not request a replacement will keep their equipment, even with an expired guarantee.

3. Environmental impact of Offices and Travel

a. 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 roughly every five years, when contracts with landlords are set for renewal. **This assessment considers increasingly demanding environmental factors.** Our global action plan is to switch to better offices in terms of the environment whenever possible, ideally certified LEED or BREEAM. Thus, many of our offices were built according to high environmental quality building norms, for example:

- In Paris, the building housing Criteo's headquarters is NF HQE²⁹ certified.
- The Singapore office is in a building that has been awarded the prestigious Green Mark Platinum Award.
- The Barcelona office is in a LEED³⁰ Gold building property while the Boston office is part of a LEED Platinum building.
- Criteo's Los Angeles building was honored by Culver City's City Council and local utility representatives as a Sustainable Business Innovator.

²⁸ Electronic waste, or commonly called "e-waste", describes discarded electrical components or electronic devices.

²⁹ NF HQE: Norme Française "Haute Qualité Environnementale" (French standard for green building certification)

³⁰ LEED: Leadership in Energy and Environmental Design

- Our London office is in a BREEAM³¹ certified building.

In 2021, the equivalent of 69% of our offices are covered by a green certification based on offices areas in m² (compared to 68% in 2020)

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

b. Optimizing use of office space and real estate footprint

COVID-19 has accelerated new ways of working, which in turn will impact the use of office space. Inevitably, Criteo, like other companies, has moved towards a reduction of real estate footprint, for instance by relocating some offices to co-working spaces (e.g. Stockholm, Seoul, Beijing, Sydney, Milan, Miami) and sharing workspaces through the reconfiguration of premises (e.g. Tokyo, Singapore, New York, Paris, Boston). The effects of this change could be beneficial from several angles; for Criteo, this serves as an opportunity to not only reduce energy consumption and the resulting carbon footprint but also pave the way for internal guidelines for sustainable refurbishment to be further developed in the years to come. For instance,

- In Tokyo, instead of the usual restoration of dismantling the old office space, all fixtures, fitting, and furniture were fully taken over by a neighboring tenant on an as-is where-is basis, minimizing energy and material use as well as waste during the dilapidation and refurbishment.
- In Singapore, 61% of old furniture and electronic appliances was donated to charity organizations for reuse, and 8% was retained to minimize disposal to 31%.

c. Energy consumption due to offices

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

In several offices, lighting is automatically switched off at night or motion sensor activated. Highly energy-efficient LED lighting is installed across many locations where feasible. The default settings for all laptops are also configured to reduce energy consumption from employees' IT equipment, by going into sleep mode when the laptop is not used and into low battery mode (lower energy consumption) when it is not plugged in.

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

Electricity consumed in offices	2020	2021	Var.
Total office electricity consumption	3,522 MWh	2,262 MWh	-36%
Total per employee	1.34 MWh/employee	0.86 MWh/employee	-36%
% from renewable energy sources	19.1%	26.6%	7.5%

³¹ BREEAM: Building Research Establishment Environmental Assessment Method

The continued drop in office energy consumption in 2021 and since 2020 is mainly due to a decrease in consumption in the EMEA and Americas offices, a consequence of the pandemic and the now widespread teleworking work habits that have spread across Criteo and will remain in place as part of our Hybrid Working policy.

Due to the complexity of obtaining data for small offices, actual electricity consumption has been collected only for offices with more than 50 employees. Two exceptions in 2021 are the offices in Gurgaon, India and Seoul, South Korea, which account for more than 50 employees for the first time this year and were thus included in the CSR scope (6% of Criteo's workforce, as a percentage of the total CSR workforce), but for which it is impossible to collect actual consumption data as both are located in shared spaces.

For other offices (with less than 50 employees), data is estimated based on a ratio per employee. They account for about 12% of the total electricity consumption. In 2021, this percentage includes the Gurgaon office and Seoul office mentioned above.

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

d. GHG emissions due to offices and travel

Criteo's most significant greenhouse gas emissions historically come from the electricity consumed in data centers and offices, but also during business trips³². We have obviously seen a significant change in working habits since 2020 and the beginning of the pandemic but continue to closely monitor the impacts of business travel and endeavor to reduce them.

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

Before the pandemic, working from home was already allowed in several Criteo offices, either in accordance with local regulations and policies or depending on practices in the country for our sector of activity. Although offices reopened during the year, remote working continued to be widely practiced everywhere, and will continue being so in future years (see section iv. 1 regarding our Hybrid Working policy).

³² According to the greenhouse gas protocol methodology, Criteo can classify its greenhouse gas emissions associated with electricity consumption and business trips respectively to scope 2 and scope 3.

CO ₂ emissions	2020	2021	Var.
From electricity consumption (offices) – in tCO ₂	887 tCO ₂	554 tCO ₂	-38%
From business trips ³³ – in tCO ₂	1,234 tCO ₂	370 tCO ₂	-70%
Carbon footprint per employee (offices consumption + business travel) – in tCO₂/employee	0.8 tCO₂/employee	0,4 tCO₂/employee	-56%

The continued decrease in carbon emissions from business trips since 2019 is a reflection of the pandemic's impact, as business travel was paused, and borders were closed.

With the pandemic, remote working became the norm for all employees in 2020 and has remained the norm throughout 2021. Therefore, business travel and commuting have been greatly reduced. Both account for a -70% reduction compared to 2020 in our travel-related emissions. It is also worth noting that Criteo's carbon emissions from business travel amounted to more than 7,700 tCO₂ in 2019, meaning it has **decreased by 95% in two years**, between 2019 and 2021.

We expect this impact to be long-lasting as new ways of working become more widespread. In parallel, employees are relying more on remote working tools such as Zoom, which also generate energy consumption and GHG emissions, which raises different challenges for the future.

e. Office waste

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

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

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

f. Responsible procurement for offices

We are taking steps to **implement an approach to responsible purchasing of furniture, office supplies and events**, by including sustainable criteria in the choice provided (compostable, recycled, etc.). Even though this is not our main area of impact, we are aware that global companies such as Criteo have a responsibility to challenge the ecological impact of the small supplies they are using, including cups, pens, disposable cutlery, etc.

As for furniture, Criteo established guidelines regarding a 'recycle, reuse, or relocate first approach. During the refurbishment of an office, the last choices to be considered are to

³³ Business trips include business trips by plane and business trips by train

donate, and as a final resort only, to dispose of used furniture. Criteo looks at the best sustainable options offered by suppliers (for example, the chairs in our Paris offices have a ten-year guarantee), in order to close the lifecycle loop. For instance, during the refurbishment of the Singapore office in 2021, 61% of existing furniture was donated and 9% was retained while only 30% was disposed of as part of our sustainability effort.

g. Employees' green initiatives

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

Due to its service-oriented activity, Criteo's main direct use of natural resources besides energy relates to paper and water. The nature of Criteo's business allows employees to promote a paperless work environment and if printing is necessary, employees are advised to reuse one-sided printed paper or print double-sided when possible.

Regarding water, Criteo has deployed sustainable development practices in most offices by using sensor-equipped faucets and two-level flushing toilets.

Until recently, Criteo's campaigns focused on environmental actions were launched mostly on a local or regional basis. Since 2020, Criteo Cares initiatives have spread across all business units and countries.

The Green Community:

The Green Community aims to raise awareness of climate change and support the company's transformation to a more responsible future. Our group of passionate volunteers helps all teams across the company to implement more sustainable and ethical initiatives to limit and offset the impact of our business on the planet and on people.

- Nearly 200 members
- 1 global leader and 4 regional leaders
- 2 executive sponsors (CTO and CPO)

The main focuses:

- Working with different teams to help them **reduce our impact**
- **Raising awareness** of climate change and environmental issues, and educating employees about sustainability
- Supporting our company in its **business to be more responsible and sustainable**

Some actions of the Green Community in 2021:

- **Tree-Nation:** in December 2020, Criteo teams extended the work they were doing with Tree-Nation by creating a "Criteo global forest". Criteo plants trees in the Criteo Forest to congratulate Criteo employees active in Criteo Cares communities with 7,408 trees being planted so far. For instance, the teams planted trees to thank all the people who completed challenges on the new volunteer platform, GIVING by ALAYA, for its launch. In the future, the Green Community and the events team plan to work with Tree-Nation for offset projects, such as our corporate events.
- **Green Talks:**
 1. For World Earth Days, the Green Community organized an **internal talk with Tree-Nation** to learn more about carbon offsetting. The founder of Tree Nation talked about the creation of the organization, why planting trees is important to save the planet and offset carbon emissions, and how people can get involved with Tree-Nation!
 2. The Public Affairs Manager shared the initiatives our Infrastructure team is leading to reduce our carbon footprint during an IAB France webinar on "Advertising and Eco-

responsibility".

3. For World EARTH DAY, we organized a talk on Air Quality Event with Charlotte Lepitre. Charlotte Lepitre is a policy officer specialized in health and environmental topics like air quality, endocrine disruptors, or nanomaterials. Since 2019, she works for the French air quality monitoring observatories.
4. In recognition of World Earth Day, we organized a session with Jen Gale, author, podcaster, and passionate believer that we all have the power to change the world! This was a good way to be empowered about climate change, discover why the climate is changing and the impact it has on our planet, and learn how to take small, doable steps to make the planet a better place.

4. Addressing climate change

While Tech companies may have relatively lower environmental impact compared to other sectors and may not be as exposed to critical climate risks today, we know our activity still may have an impact on the planet, and we understand the importance of addressing and responding to climate change. In particular, we understand the need to better assess and integrate climate-related challenges, through a dynamic process.

For example, we could be impacted by short-term business disruptions resulting from the increasing intensity and frequency of severe weather/natural disasters caused by climate change. We know that these events may affect data centers or our suppliers' activities and could potentially have a direct impact on our processes. As such, we continue to analyze this emerging risk to establish appropriate response strategies and we have started working with an external firm of experts in order to set up a long-term environmental strategy.

Our impact

As previously mentioned, we are currently performing a complete GHG assessment that will cover all emission scopes 1, 2 and 3. This will help us define a roadmap to set realistic GHG emission and energy-reduction goals. We aim at setting up a long-term and committed environmental strategy in 2022 across all our operations, in order to improve our understanding of the challenges that climate change holds for our company, and design suitable solutions to manage them.

Our stakeholders

We understand the need to do the right thing for our planet, our communities, and our stakeholders. From a business perspective, consumers' behaviors are evolving toward more environmentally conscious habits, just as regulatory pressure to promote responsible consumption is increasing. Those trends could prefigure major changes in some of our markets, generating risks but also presenting us with key business opportunities. As we strive to minimize our environmental impact and promote sustainable habits in the workplace, we believe this will also contribute to strengthening our ability to attract and retain key talent.

vi. Sustainable relationship with stakeholders

1. Dialogue with stakeholders

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

- Employees (see section iii. & iv.)
- Clients, prospective clients, and publishers (see section vi. 2)
- Investors and shareholders (see section vi. 3)
- Technology partners, suppliers and subcontractors, and data-center operations (see section vi. 4)
- NGOs (see section iv. 3)
- We also engage with other categories of stakeholders through actions and initiatives not detailed in this report, including public authorities and regulatory bodies, start-up networks, industrial associations and professional networks, journalists and media influencers, research centers and labs, employee representatives and unions, banking partners, financial analysts and influencers, schools and job applicants, and partner non-profit organizations.

It is worth noting that in 2021 our Legal department set up a working group entitled the '**Product Ethics Committee**'. Its purpose is to address potential concerns that our stakeholders may raise about the personalized advertising industry (see paragraph vii.1. for more information).

We also extended our consultation with external stakeholders in 2021 as part of the update of our materiality analysis presented in introduction to the CSR report.

2. Clients and publishers

Criteo's Platform, Marketing and Operations team collaborates closely with Criteo's clients and supply partners to deliver expert consulting, fast and smooth integration, and ongoing campaign management to **ensure the optimal use of Criteo's technologies and the attainment of 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 quarter³⁴ since 2011.

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

³⁴ Quarterly retention rate represents the percentage of live clients during the previous quarter that continued to be live clients during the current quarter.

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

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

In order to continue improving the quality of its services and to create a trustworthy relationship with clients, Criteo conducts **an annual customer satisfaction survey (CSAT Survey)**. Close to 1,800 client contacts responded this year, representing almost 1,300 of our client accounts. The results of the CSAT survey are transmitted in real time to our employees in charge of client relations, in order to be aware of areas of improvement identified and provide personalized support to their clients. In 2021, this close-the-loop system resulted in over \$24 million in protected revenue from detractor accounts that were deemed at risk.

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.

3. Investors and shareholders

Transparency and accountability continue to underpin everything we do. Our management team along with our Investor Relations (IR) team are actively engaged with the investment community. In 2021, we participated in 21 investor conferences and non-deal roadshows. We also hosted a virtual investor day in June 2021, offering current and potential shareholders and sell-side analysts an opportunity to learn more about Criteo's transformation, strategic initiatives, and ESG approach to drive long-term sustainable growth.

We have a comprehensive Investor Relations [website](#) which contains current and archived presentations, webcasts, financial information, press releases, and other information about the Company that investors may find useful. To drive further awareness of our Sustainability efforts, we increased our IR website disclosures to highlight important actions and commitments around key topics such as DE&I and the reduction of our environmental footprint.

We believe that proactively identifying and addressing evolving ESG risks and opportunities is critical to drive long-term value. We regularly refresh our materiality assessment, and in 2021 we especially leveraged feedback from analysts and investors among other key stakeholders (see section ii. 1 of this report) to identify and prioritize the issues that matter most to our business.

As part of our ongoing commitment to transparency and in line with investor expectations, we are focused on enhancing our disclosures on material ESG topics. This year, **we adopted the Sustainability Accounting Standards Board (SASB) reporting framework**³⁵ (see Appendix 1). We recognize that sustainability is a journey, and we are committed to further improving the disclosure of our impacts in the future. To this end, we intend to respond to the CDP³⁶ Climate Change questionnaire and adopt the Task Force on Climate-related Financial Disclosures (TCFD) framework in 2022.

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

³⁵ See our SASB concordance table in the Appendix 1

³⁶ Carbon Disclosure Project

4. Subcontractors and suppliers

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

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

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

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

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

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

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

In addition, Criteo plans to enrich its suppliers' risks management processes in 2022. This will include ESG/CSR risks analyses and the ambition to work with third parties to ensure that we are working with responsible vendors, starting with the most strategic ones.

vii. Ethics and Compliance

Criteo has adopted a **Code of Business Conduct & Ethics** (the “Code”) setting out the policies and procedures that reflect our commitment to maintaining the highest standards of honesty, integrity, and ethics when conducting business.

In particular, the Code 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](#).

1. Ethics in our Ads

We are aware at Criteo that being a responsible company also means proposing responsible services. While our services, by nature, do not have a significant social or environmental impact compared to other industries, we intend to anticipate and address rising expectations when it comes to ethics in our ads.

For that purpose, Criteo set up a **working group comprised of its Legal team and Artificial Intelligence** labs in 2020 to reflect on the ethical nature of its service products. The leadership team has decided to create a **Product Ethics Committee in 2021**. The committee is chaired by Criteo's General Counsel and Secretary, Ryan Damon and gathers executives from the Product, R&D, HR, Marketing and Commercial teams.

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

1. Data collection and processing, including data security and privacy in the context of advertising or commerce insight; bias detection and remediation in the context of machine learning model development and application; etc.
2. Review of Criteo Advertiser and Publisher Guidelines to adapt to changing regulations.

Lastly, our **Supply Partner Guidelines** were specifically established as to better control the practices of Criteo's network of publishers when it comes to the use of our products and services, for instance regarding:

- Content restrictions (alcohol, tobacco, gambling, firearms and weapons, etc.)
- 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](#) also constitute a cornerstone of the ethical approach by defining what our clients can't do using our platform: restriction on products, restriction on targeting, etc.

2. Data privacy

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

Since our first product offering in 2008, we have delivered the highest levels of security and data privacy across our portfolio of products, technologies, and services in line with 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 in place, 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 them, for example, about the right to be forgotten.

The **Privacy Policy** is available on Criteo's website [here](#).

Guidelines specific applicable to publishers, including in terms of data privacy, are available in the **Supply Partner Guidelines** on Criteo's website [here](#). Also, the [Advertising Guidelines](#) have a section on privacy as well.

a. Privacy by design

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

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

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

Key elements of the Privacy by Design approach also include:

- As required by the GDPR, since 2013, we have had a designated **Data Privacy Officer** along with a team of privacy experts. In fact, being aware of the importance of the subject, we had hired a **Data Privacy Officer** long before the GDPR regulations became effective.
- These experts sit within the Product and R&D department. They perform ongoing Privacy Impact Assessments to monitor potential risks during the product lifecycle and

proactively mitigate those risks.

- The Data Privacy team delivers company-wide **privacy training**, enforces **codes of conduct**, and is integral to ensuring that we build **best-in-class products and services**.

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

b. Strict security measures

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

Also, in accordance with GDPR requirements, we implemented in 2018 a **Privacy Compliance Management Software** that allows us to track down and record all data incidents and problems in terms of privacy. It is also an obligation for Criteo to notify the *Commission nationale de l'informatique et des libertés* (CNIL, the French regulatory body in charge of personal data protection) within 72 hours if any incident occurs that could induce major risks for people's personal data. **No such incident occurred in 2021.**

In the context of the COVID-19 pandemic, Criteo observed an increase of phishing attempts. Specific video communications were sent out by our Internal IT team to address this concern as well as advanced phishing simulation in order to raise awareness to Criteo's employees.

c. Transparency and control

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

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

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

Also, in accordance with GDPR, **Criteo is maintaining an assistance form available on the company's website** that can be used by all users, clients, or partners if they have questions or have experienced any issue in the way their data is managed. Criteo has an obligation to respond to such requests under 30 days.

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

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

d. Industry leadership

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

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

Also, as mentioned earlier in this report, in 2021, Criteo was proud to win three Culture and Diversity awards. More information about these awards can be found [here](#).

e. Data privacy at Criteo

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

Moreover, awareness-raising programs with regard to cyber-security are carried out for Criteo's employees, and in 2021, **trainings content was repurposed, reorganized and retailed** to adapt to work from home needs and new processes.

We also organized a **"cyber month"** in October 2021, aimed at making employees better informed of risks related to cyber-security and the way to prevent them through workshops, challenges, presentations, etc. The cyber month was developed with several talks organized throughout the month and more advanced security awareness content and gamification such as "Capture the Flag".

3. Fight against tax evasion

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 and Ethics and OECD guidelines.

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

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

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

For more details regarding tax management, please refer to our most recent Annual Report on Form 10-K.

4. Anti-corruption

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

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

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

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

Criteo employees, as well as Criteo's directors, temporary workers, consultants, and interns in the context of their professional duties.

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

5. Alert mechanisms

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

When appropriate, Criteo encourages employees to talk with their direct managers first, as they will often be able to resolve issues quickly. Alternatively, they can also raise these issues to their **People Team representative**, a member of senior management, the General Counsel or the Compliance Officer.

If for any reason, an employee does not want to raise **their** concerns through one of these channels, **Criteo welcomes them to use the Criteo Whistleblowing Hotline**, a confidential, 24/7 service managed by a third-party service provider, or send a confidential email to a defined email address or choose to submit a secure Whistleblowing form. The report will be sent directly to the Chair of the Board's Audit Committee, an independent director of the company who is neither an employee nor a manager. All reports are kept confidential as permitted under applicable law.

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

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

Appendix 1

SASB concordance table

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 (%)	v.2-3
	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 (m³) (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	v.2-4
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	vii.1-2
	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 10K report
	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 (%)	

	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	
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 2021, 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	vii.2
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 65% of employees work in offices outside of France. Criteo has approximately 3% of employees defined as foreign nationals who have work visas in the country which he/she is employed.
	TC-SI-330a.2	Employee engagement as a percentage	Quantitative	Percentage (%)	iv.2
	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for: (1) management (2) technical staff (3) all other employees	Quantitative	Percentage (%)	iv.3 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 10K report
Managing Systemic Risks from	TC-SI-550a.1	(1) Number of performance issues	Quantitative	(1), (2): Number (3): Days	Criteo chooses not to disclose this information due to its sensitive and proprietary nature.

Technology Disruptions		(2) Number of service disruptions (3) Total customer downtime			
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	N/A	Please refer to our latest 10K report

Methodological note

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

Reporting period and scope

All information collected and highlighted in the CSR report covers the period from January 1, 2021, to December 31, 2021.

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

Therefore, to ensure reliable quantitative data and boost continuous improvement, the Criteo CSR reporting scope for 2021 considers the major global legal entities with more than 50 employees at the end of 2021. For electricity consumption, only offices with more than 50 employees are taken into account, due to the information being complex to obtain for smaller offices.

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

Thus, for the financial year 2021, the reporting scope on quantitative data covers the following legal entities and offices, which represent 93% of the overall Criteo's workforce for social information and environmental information.

In 2021, two legal entities have been added to the CSR scope since they account for more than 50 employees: Criteo India and Criteo Korea. However, due to unavailability of actual environmental data for this first year, the electricity consumption from their respective locations in Gurgaon and Seoul has been estimated based on a yearly ratio per person.

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

Legend: In bold, offices with more than 50 employees collect actual data for electricity consumption. For other offices, electricity consumption and CO₂ emissions due to electricity consumption are estimated based on a yearly ratio per person. Those offices account for 12% of office electricity consumption and 12% of emissions due to office electricity consumption. As mentioned above, Gurgaon and Seoul offices should have reported actual data for electricity consumption as they account for more than 50 employees, however this data was estimated due to unavailability in 2021. Those two offices represent 6% of Criteo's headcount on the CSR scope.

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 CSR 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.

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

CSR indicators – Calculation and estimation methods

● **Headcount:**

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

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

- **Training:**

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

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 Human Resources business partners to the Global Learning & Management Development team
- Individual coaching or state of the art co-development sessions
- Management and leadership development modalities

Are excluded:

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

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

E-learning training hours

Due to the large choice of e-learning platforms offered to Criteo employees (Coursera, LinkedIn Learning, 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:
 - o 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.
 - o MOOC learning: recorded from one hour to max 25 hours (Coursera). As the MOOC courses should take between 19 & 25 hours, a limit of 25 hours for this type of e-learning has been set to make sure that this range includes mostly learning hours contents. Above 25 hours will include most of the time quizzes, exams or discussion forums.
- The reporting of only theoretical hours, not the actual "on-line connection time", for instance for E-learning training from Product department
- Language trainings do not have a minimum duration as we considered that language learning should be measured from the start, especially in 2020 in the context of the COVID-19 pandemic.

Are excluded:

- Time logged in the LMS
 - Training content below the minimal duration or above the maximum duration
 - Training content started during the previous financial year
 - Training content only related to an assessment or quiz
 - Training content only based on "document reading" or "link to document"
 - Training content related to basic IT application tutorials for all employees such as expenses reports, Human Resources Information System
 - Programs and content pushed/prescribed to all employees for compliance purposes or for IT application up skill
-
- **Business trips:** Data from the business travel agency, EGENCIA, includes all Air Travel Scope as well as Train trips since 2020.
 - **Electricity consumption of offices:** Where the value for one or several months is missing, an extrapolation is made based on the months available.
 - **Electricity consumption of data centers:** Actual data is supplied by Criteo's data room providers. Electricity consumption includes all data centers except POPS for which power 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 from electricity consumption of offices:** Emission coefficients per country from ADEME 2021 database have been used for the calculation.
 - **Carbon emissions from electricity consumption of data centers:** For a data center with a 100% rate of renewable energy (including using compensation certificates), the emission coefficient is considered equal to 0. For the other data centers, emission coefficients per country from ADEME 2021 database have been used for the calculation, except for Hong Kong where a rate of 0.51 *10⁻³ t_{eq}CO₂ has been used from CLP database (local electricity supplier).
 - **Lifecycle carbon footprint for Infrastructure (Data Centers):** The calculation methodology for this assessment was defined with the specialized consulting firm Carbone 4. The life cycle analysis covers infrastructures relating to IT equipment (servers, network equipment...) and includes scopes 1, 2 and 3 emissions, including refrigerant fluids. The carbon footprint of IT equipment is accounted for only the year of purchase and is not depreciated over years. End-of-life emissions of equipment are accounted for when the equipment is decommissioned, and not at the time of purchase. Actual data is obtained directly from suppliers where available, else estimation methods are used in order to have a vision as complete as possible of the carbon footprint. This methodology does not take into account the servers already in production.
 - **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 R. 225-102-1 of the French Commercial Code:

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

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

Disclaimer – About this report

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 non-audited estimates, not prepared in accordance with generally accepted accounting principles (GAAP), 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 securities law 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 at <https://criteo.investorroom.com/sec>.

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,” “target,” “seek,” “may,” “will,” “might,” “plan,” “potential,” “predict,” “objective,” “should,” 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: the ongoing effect of the COVID-19 pandemic, including its macroeconomic effects, on our business, operations, and financial results, and the effect of governmental restrictions and regulations on our operations and processes; 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 at <http://www.sec.gov>.

Pursuant to Article A. 225-1 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 is 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 Deloitte 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.