

# Non-Financial Performance Statement 2022

Criteo's Corporate Social Responsibility Report

*February 2023*

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

At Criteo, our values are core to who we are — they're at the center of every decision we make, and 2022 was no exception.

Last year, we moved forward in our commitment to a sustainable planet. We unveiled our five-year environmental roadmap, including the calculation of our carbon footprint, and thanks to the continued support of our "Green Community", we organized clean-ups with more than 300 employees across eight of our offices. Together, we made an impact.

We also made important commitments to our people by providing working conditions to support work-life balance and wellbeing. We're proud to have launched our Fully Flexible Working Approach last year. This policy allows employees to work from home, from the office, or a mix of both, in whatever ways best meet their needs, empowering them to do their best work whilst balancing their wellbeing.

Further, we signed the LEAD Network CEO Pledge, striving to create a strengthened commitment towards gender parity, and we partnered with "Carrot Fertility" to ensure that all employees and their partners have access to fertility and family-forming benefits, as well as support.

Our enhanced mandatory Code of Business Conduct & Ethics and our brand-new Preventing Harassment training also provide our employees with the knowledge and understanding to enable them to behave ethically, responsibly, and respectfully on a day-to-day basis. The revamped Code of Business Conduct & Ethics reflects Criteo's commitments towards its employees, its communities, its clients, and its stakeholders.

At Criteo, we don't want to do the minimum. Our focus is to strive for continuous improvement and positive impact for our employees, our partners, our clients, and the consumers they serve, so that we can build a sustainable future together.

Megan Clarken & Rachel Picard



# Introduction

## About This Report – Process for Elaborating the CSR Report

Corporate Social Responsibility (CSR) has always been a part of who we are, long before Criteo issued the first installments of this annual CSR report (the “CSR Report” or “Report”). We are proud of our culture where our people have always been driving us to “do better”. The multiple social and environmental initiatives they’ve hosted over the years, from our offices in every part of the world, confirm this claim.

As Criteo advances toward increasingly structured and ambitious commitments, more than ever, CSR remains everyone’s responsibility. Our employees’ strong engagement is what makes it possible for us to achieve our goals in terms of Diversity, Equity, and Inclusion (DEI), ethics, and the environment. They will also shape our future growth and define the value we want to create for society. We are excited to present them in this Report.

Beyond describing Criteo’s overall CSR strategy, the Report also presents the highlights and progress we achieved in 2022. The Report was prepared according to the transposition of the European directive 2014/95/EU<sup>1</sup> in regard to the disclosure of non-financial and diversity information by certain large undertakings and groups, in addition to recognized non-financial reporting standards such as the ones of the Sustainability Accounting Standards Board (SASB) (see concordance details with SASB standards in the Appendix). 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 Report is available in the “Methodological Note”.

This Report follows a standardized annual process that combines the identification of topics that we tackled throughout the year, and a review of new topics we would like to address in the future. At this initial stage, we also review additional performance indicators, along with other areas of improvement such as the scope or structure of the Report.

We then organize a round of interviews with the internal contributors who are best able to accurately describe the progress and achievements made over the year.

The final steps for the preparation of the Report include a consolidation of full-year data, an audit of this data, and production of the overall Report by an independent third party. The Report is then reviewed by internal teams, such as Global Communications, Legal and Compliance, Finance, Investor Relations, and various stakeholders involved in sustainability topics across the organization.

We are also working to improve the contents of the Report in line with stakeholders’ expectations and best practices regarding climate-related disclosure, so it can be fully aligned within the next 12 months with the Task force on Climate-Related Financial Disclosures (TCFD) recommendations and Carbon Disclosure Project (CDP) requirements.

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<sup>1</sup> Disclosure of non-financial and diversity information by large companies and groups.

## I. About Criteo

### 1. 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, Mabaya in 2021, and IPONWEB in 2022, 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 to best engage consumers throughout their shopping journey.

Our vision is to bring richer experiences to every consumer by supporting a fair and open internet that enables discovery, innovation, and choice — powered by trusted and impactful advertising. Since 2018, and accelerating since 2020, we have deeply transformed our offering from a single product to a multi-solution, 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 in commerce outcomes for our clients — 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 clients, 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 commerce audience targeting and brand awareness. During 2022, we operated in 96 countries.

**The Criteo Commerce Media Platform:** We have made significant progress in our transformation journey to meet the needs of brands, marketers, retailers, and media owners in the evolving commerce landscape. With our unique Commerce Media Platform, we offer 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 the world's largest set of commerce data.

Our technology is optimized to efficiently drive trusted and impactful business outcomes for our brand, retailer, and media owner clients. These include, for example, driving engagement for our clients' brand, shop, app, products, and services; driving product sales; driving app installs and consumer visits; driving product consideration from targeted commerce audiences; or driving advertising revenue for media owners and retailers by monetizing their data and audiences with consumer brands.

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

On the demand side:

- **Commerce Max** is a Commerce self-service Demand Side Platform (DSP) used by brands, agencies, and retailers, enabling media planning and buying on retailer and open internet inventories leveraging Criteo's AI atop approved retailer data and unique commerce data, all with closed-loop product-level conversion measurement.
- **Commerce Growth** is a powerful, self-service performance marketing tool used by Direct-to-Consumer brands and their agencies to activate outcomes-optimized customer acquisition and retention objectives.

On the supply side:

- **Commerce Yield** is a Commerce Media monetization stack and ad server giving retailers and marketplaces full control to achieve maximum monetization of their digital assets through inventory and data management, packaging, and in-depth insights.
- **Commerce Grid** is a Commerce Media Supply Side Platform giving media owners the control to optimize the monetization of their inventory and data assets.

**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, including Retail Media at the core. Our overarching priority is to drive sustainable and profitable growth for our business. This involves increasing our focus on the fast-growing ecommerce space further 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 five years, the growth of retargeting has been slowing down and this trend is expected to continue in the coming years despite incremental privacy headwinds. During this time, the end of support of third-party signals on several browsers has had a significant impact on our business on the web, including retargeting. The need to meet rising consumer demand for privacy-safe advertising is an underlying trend that Criteo must adapt for the future of addressability. This is one of the key factors for the ongoing business transformation.

Criteo's ongoing transformation and growth strategy 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 we are currently strengthening our offering and expanding our business, always focused on driving trusted and impactful results for clients. We will 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. 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 August 2022, we completed the acquisition of **IPONWEB**, a market-leading ad tech company with world-class media trading capabilities. 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.

Our large and loyal base of clients and first-party publisher partners provide stability and positive network effects. As of December 31, 2022, we served approximately 22,000 clients and were working with thousands of direct publishers on both web and applications, in addition to our large global and local RTB<sup>2</sup> partners. As our client base continues to grow, we keep increasing the number of users interacting with our ads, enabling us to deliver even more precisely personalized ads, expanding our publisher network further and generating 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 (described in the next pages).

#### Key inputs and assets for Criteo:

Our clients: Our client base is composed of two client categories: the **Enterprise client category** (large clients), and the **Growth client category** (midmarket clients). Each client category is serviced through a combination of direct and indirect approaches, including through brand agencies for the Enterprise category, and through performance agencies and resellers for the Growth category.

These companies range from large, global, and 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 2022, approximately 67% of our client relationships were held directly with them and the remaining 33% with advertising agencies or other third-parties on the Criteo Marketing Solutions side of the business, whereas 37% of our Criteo Retail Media revenue comes from agencies.

- As of December 31, 2022, we served approximately 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 2022.
- We had exposure to over \$1 trillion in online sales transactions on our clients' digital properties in the year ended December 31, 2022.

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<sup>2</sup> Real Time bidding.

**Employees and Human Capital Management:** The well-being and success of our workforce come first, as we are driven by our core values of “Open, Together, and Impactful”. All human capital management initiatives are overseen directly by the Board of Directors, confirming the importance of this topic to Criteo

Attracting and retaining top talent is a key objective at Criteo. We are committed to offering an environment where 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 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 essential in our ability to attract and retain talent.

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 concern. In 2022, we carried out two employee engagement surveys, soliciting feedback on a wide range of topics including well-being, flexibility, and inclusion with other employees. Employee health and safety is a top priority for Criteo. As described later in this Report (see section V.1.), we devote time and effort across all our locations to providing a positive work environment, work-life balance, and the healthiest office conditions 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 DEI<sup>3</sup> policy and in our Code of Business Conduct & Ethics, our mission is to sustain our focus on equity, build stronger diversity through how we hire, develop, reward, and retain talent at Criteo, and strengthen our culture of belonging for all. We empower our employees to impact the industry, promoting diversity, equity, and inclusion in everything we do. Our efforts to foster a diverse and inclusive workplace are led by a dedicated DEI 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 a sense of community and provide networking and safe spaces for all diverse communities throughout Criteo.

- As of December 31, 2022, we had 3,335 employees (total headcount), meaning 3,113 for the CSR scope<sup>4</sup>.
- As of December 31, 2022, 43% of our employees were women (CSR scope).
- In 2022, over 34,828 training hours<sup>5</sup> were delivered to our employees (CSR scope).
- In 2022, the global score for the employee engagement<sup>6</sup> survey is 81 (on a scale from 0 to 100).
- Through our Pay Parity Action Plan, the pay gap has been maintained to 0% in 2022.

**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 (APAC), and Europe, Middle East and Africa (EMEA). In each of these

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3 Diversity, Equity, Inclusion.

4 See the Methodology note at the end of the report.

5 Code of Business Conduct and Ethics piece of training excluded.

6 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?"



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 reducing the carbon footprint of our infrastructure and overall activities in future years.

As of December 31, 2022, our global infrastructure includes:

- Approximately 45,000 servers through a global network of ten processing data centers (and three Points of Presence), including one Hadoop cluster<sup>7</sup>, that comprise to 3,000 servers hosting 800,000 processing cores, providing a storage capacity exceeding 280 petabytes and 1 petabyte of random-access memory,
- 100% of the CO<sub>2</sub> emissions linked to data centers use are now offset, either directly by the data center providers or through Criteo's own purchasing of Renewable Energy certificates (REC).

**Research and Development (R&D):** We invest substantial resource to conduct fundamental research on artificial intelligence and machine-learning models to enhance the 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 acquisition of IPONWEB, we also have expanded our R&D engineering centers to include Berlin (Germany), Limassol (Cyprus), and Yerevan (Armenia). We expect to continue to expand the capabilities of our technology in the future and to invest significantly in continued Research and Development, and new solutions efforts.

- We had close to **879** employees<sup>8</sup> primarily engaged in Research and Development and Product as of December 31, 2022.
- Research and Development expenses, including expenses related to the Product group, totaled \$187.6 million for 2022.

**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 and considered (or are considering) some legislation or regulations that could significantly restrict industry participants' ability to collect, augment, analyze, use, and share personal data. Some regulating, for instance, the level of consumer notice and consent required before a company can utilize cookies or other tracking technologies.

#### **Financial results:**

- Revenue of \$2,017.0 million for the year ended December 31, 2022.
- Contribution ex-TAC of \$928.2 million for the year ended December 31, 2022.

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<sup>7</sup> A Hadoop cluster is a cluster of servers for performing Big Data analysis quickly and efficiently by distributing the task among the different computers that make up the cluster.

<sup>8</sup> Excluding Iponweb's teams.

- Net income of \$10.9 million for the years ended December 31, 2022.
- Adjusted EBITDA of \$267.3 million for the year ended December 31, 2022.

More information regarding Criteo's activities, governance, financial performance, and results for 2022 is available on the company's website for investors [here](#).

## 2. Our Culture and Values

At Criteo, we believe the future is wide open. We also know a wide open future is only possible with great products and great people.

In 2021, we created **Criteo's Culture Book** (available [here](#)) to answer the question, "Who are we?" and define our culture as our company evolves and transforms. Criteo's values of **"Open, Together, and Impactful"** were defined based on feedback we received from 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. We stand open, together, and impactful through our different Employee Resource Groups (see section IV.) and, above all, through action.

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

In 2022, we revamped our **Code of Business Conduct & Ethics**, which is also a presentation of **Criteo values and commitments in terms of ethics and business conduct towards its employees, communities, clients, and stakeholders**. It now highlights our CSR commitments, showing that CSR is a core business imperative for Criteo. We believe that the goals we are setting in our Code of Business Conduct & Ethics can only be achieved through the engagement of all employees. They shape our future growth and define the values we want to create for society.

More information about our Code of Business Conduct & Ethics is available in section VII.1. of this report.

## 3. Our Approach to Corporate Social Responsibility (CSR)

### a. Main CSR Risks and Materiality Analysis

#### *Main CSR risks for Criteo*

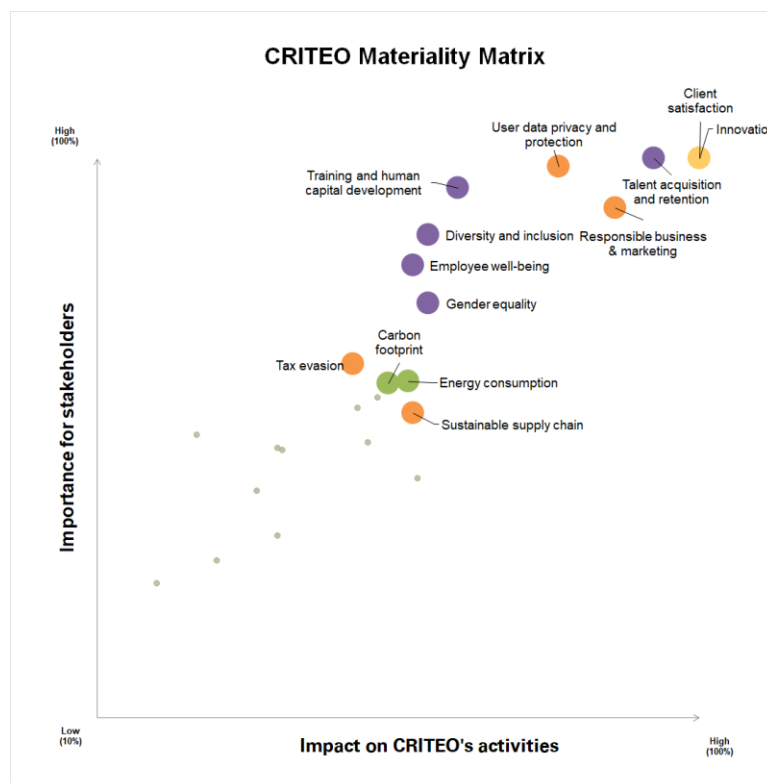
Criteo performed its first dedicated CSR risk assessment in 2018. We identified a list of relevant CSR-related risks based on benchmarks from our business sector, and interviews which were conducted with internal stakeholders who work with the CSR team. These stakeholders assessed the risks in order to define a priority list of areas of potential impact. Based on this analysis, **Criteo selected eight main**

CSR risks<sup>9</sup>. The alignment of the CSR risk mapping with the enterprise risk mapping and the corruption risk mapping is regularly reviewed by the Internal Audit & Control and Compliance teams (last time in 2022).

#### *Materiality analysis*

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

During those updates, stakeholders are asked to assess the importance and relevance of CSR topics related to Criteo's activities. Combining the results of these interviews and the CSR risk assessment mentioned above, we establish annually our materiality analysis, presented below.



In 2021, we also launched an online CSR survey with the aim of better understanding our external stakeholders' expectations 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 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,

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<sup>9</sup> List of main CSR risks identified: Talent acquisition and retention, Training and human capital development, User data privacy and protection, Energy consumption, Carbon footprint, Supply chain, Gender equality, Inclusion and Diversity.



## 5. Talent acquisition and retention.

To comply with the European directive 2022/2464 in regard to corporate sustainability reporting, we plan to conduct a double materiality analysis in time for the financial year 2025.

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

CSR Theme	Material CSR topics	Section
Environmental impact	Energy consumption	II. 2-3
	Carbon footprint	II. 1-2-3
Talent acquisition, development, and well-being	Talent acquisition and retention	III. 1-2-3
	Training and human capital development	III. 4
	Employee well-being	V. 1-2
	Inclusion, diversity, and gender equality	III. 3; v. 3
Relation with clients	Client satisfaction	VI. 2
	Innovation	III. 4-5
Business conduct and ethics	User data privacy and protection	VII. 2
	Responsible business and marketing	VII. 1-3-4-5
	Sustainable supply chain	VI. 4
	Global Tax Compliance	VII. 3

## *b. Our CSR Approach*

In 2022, we focused our CSR efforts on **Environment, Diversity, Equity, and Inclusion, and Tech for Good and Education**.

### *"Environment"*

Our environmental initiatives are carried out by our CSR team with the support of our "Green Community" (see section II). In 2022, Criteo defined an **environmental strategy and action plan** that reinforced our CSR strategy. We want to set goals that make sense, that have a positive effect on our planet, and that we can all be proud of. Goals that will enrich our culture and echo our values. In 2023, Criteo expects to establish carbon reduction targets endorsed by the Science-Based Targets initiative (SBTi) and implement a greenhouse gas (GHG) emissions reduction and adaptation plan aligned with the Paris Agreement.

More information is available in section II. of this Report.

### *"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 team and supported by five of our community groups, introduced later in this Report (see section V.3.).

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

More information is available in sections III.3. and V.3. of this Report.

### *"Tech for Good and Education"*

Regarding our Tech for Good<sup>10</sup> and education, our initiatives are carried out by our CSR, DEI, and Public Affairs teams and our Education Community. We believe that we must give back to society. Through our global talent, we have a variety of expertise and skill sets that are recognized as among the best in our industry. We believe that through education, we can improve livelihoods and develop thriving communities for future generations. Therefore, we **work with several mentorship associations** to support various communities: young people, refugees, people in professional reintegration, *etc.*

More information is available in sections V.3.e., VI. and VII of this Report.

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<sup>10</sup> "Tech for Good" literally means "technology for good". This indicates a collective awareness that "positive societal impact" must be placed at the heart of tech and digital transformation.

c. CSR Governance

## Governance

### Corporate Social Responsibility

#### Chief Executive Officer (CEO) - Megan Clarken

- Sponsor DEI and CSR at Criteo

#### Executive Team - Global leadership team

- Approve the strategy and engage their teams on all CSR topics

#### SVP Talent Development and DEI - Rachel Scheel

- Lead the company's DEI and CSR strategies

#### Corporate Social Responsibility and Environment Team

- Oversee CSR and Environmental strategies across the company

#### Diversity, Equity, Inclusion (DEI) Team

- Embed DEI in the company's culture

#### Criteo Cares Program - Employee Resource Groups

- Enrich the strategy, provide feedback and raise awareness.
- Green Community, Women@Criteo, BIPOC Community, Criterable Community, Pride Community, Education Community, Parents Community

#### d. Key Results and Objectives

Criteo formalized a set of **CSR objectives** aligned with the main projects and initiatives we are carrying out or are planning to implement in the future. The table below summarizes our CSR objectives as of 2022, which Criteo aims to review and improve in the coming years.

CSR topic	Ambition	Target	2022	2023 (target)	Section
Environmental Strategy	Define an Environmental Strategy and Action plan	Identify and implement actions to reduce our environmental impact by the end of 2022	Achieved	Moving forward on actions.	Section II - Reduce Criteo's Environmental Impact
		Publish an Environment statement and Policy by the end of 2023	Environment statement Achieved	Publishing the Environment Policy by the end of 2023.	Section II - Reduce Criteo's Environmental Impact
Greenhouse Gas Assessment		Yearly measure Criteo's carbon emission (scope 1, 2, 3)	Achieved	To be continued. Partnership with the SWEEP platform.	Section II - Reduce Criteo's Environmental Impact
Define carbon reduction targets and have them approved by SBTi by the end of 2023		Project approved by Criteo's Leadership team.	Ongoing - with the support of climate experts.	Section II - Reduce Criteo's Environmental Impact	
Data Centers (Infrastructure) and Offices	Limit the carbon footprint of our Data Centers	Offset 100% of the energy used to power our data centers by the end of 2021	Achieved	Maintain 100%.	Section II.2 - Environmental Impact of Data Centers and Hardware
	Manage other environmental impacts related to our Data Centers and Offices	Yearly track data center and office water consumption	Offices: 4,758 m3 Data center: 60,471,824 L <i>(water consumption disclosed here for data centers in 2022 is an estimate and not a precise measurement)</i>		Section II.2 - Environmental Impact of Data Centers and Hardware  Section II.3 - Environmental Impact of Offices and Travel
	Limit the carbon footprint of our offices	Increase the part of non-decarbonized energy that powers our offices	Non-decarbonized energy represents 80% of our office energy consumption in 2020, 70% in 2021 and 58% in 2022.		Section II.3 - Environmental Impact of Offices and Travel
Business trips & Events	Limit the environmental impacts linked to our events	Offset all travel related to our annual internal company event	Achieved	Non applicable.	Section II - Reduce Criteo's Environmental Impact
	Limit the environmental impacts linked to our Travels	Offset all carbon emissions related to business trips (air & train) and hotels	Achieved	Action to be pursued in 2023.	Section II - Reduce Criteo's Environmental Impact

Global DEI Strategy	Maintain Inclusion scores	Maintain our Inclusion scores from the Inclusion Index at 75% or above (Targeted culture questions focusing on authenticity, psychological safety, belonging, and inclusive leadership)	75% in 2021. 83% in 2022.	75% or above in 2023.	Section V.3 - Diversity, Inclusion, and Equal Opportunities
	Increase the share of women in Management	Increase the percentage of women being promoted (respecting proportionality principle)	39% in 2020. 44% in 2021. 44% in 2022.	45% by the end of 2023.	Section V.3 - Diversity, Inclusion, and Equal Opportunities
Gender Equality	Increase the share of women in Tech roles	Increase the percentage of women in Tech roles by 2% year on year (2021-2024)	14% in 2021. 16% in 2022.	18% by the end of 2023.	Section V.3 - Diversity, Inclusion, and Equal Opportunities
	Ensure pay parity for through our Pay Parity Action Plan	Maintain pay parity throughout Criteo, with a bi-annual review and intentional actions in hiring, promotion, and pay cycle management	Achieved. Average compa-ratio of 0.94% for men and 0.94% for women before calibration.	Maintain Pay Parity.	Section V.3 - Investing in Headcount and Talent Initiatives
Employee engagement (Criteo Cares Program)	Increase employee engagement within the community groups	Increase the number of employees involved in (at least) one community group (with closer to 50% globally)	39,9% (1332 employees VS 3335 total workforce).	42%	Section IV - Stakeholders' Engagement and Criteo Cares Program
	Deploy the volunteering platform (Giving by Alaya)	Increase the number of employees who created an account by the end of 2025 (with closer to 65% globally)	709 employees (Approx. 20%) in 2021. 1,845 employees (Approx. 55%) in 2022.	Maintain +50%.	Section IV - Stakeholders' Engagement and Criteo Cares Program
Employee skills	Provide access to training for our employees	Increase the percentage of employees trained (workshop & digital) - excluding compliance-training (with closer to 80% globally)	105% in 2021 100% in 2022	80% or above in 2023.	Section III.4 - Skills Management & Development
Sustainability Governance	Strengthening the governance of our sustainability strategy	Set up an Internal Sustainability Committee and publish a charter by the end of 2023	N/A	Publish the charter by the end of 2023.	/
	Increase visibility and ownership of sustainability issues by all teams	Organize a quarterly meeting with the sustainability committee and disclose the participation rate by the end of 2023	N/A	Organize a quarterly meeting with the sustainability committee by the end of 2023.	/
Ethics	Train employees regarding compliance and ethics	Maintain the number of employees who completed the Code of Conduct and anti-harassment pieces of training (with closer to 80% globally)	Code of Conduct: 97% in 2022. Anti-Harassment: 81% in 2022.	80% or above in 2023.	Section V.3. Non-discrimination and Prevention of Harassment
Procurement	Assessing our company and our vendors	Set up a partnership with a Supplier Sustainability Rating Platform and assess key vendors on CSR by the end of 2023	Partnership achieved. Key Vendors CSR Assessment in progress.	Complete Key Vendors CSR Assessment	Section VI.4. Subcontractors and Suppliers
		Obtain an EcoVadis rating by 2022, and improve it by the end of 2025	Bronze EcoVadis Medal (nov. 2022)	Target for 2024: Silver EcoVadis Medal	Section III.4. Awards and Recognitions
Gender Diversity	Board team Gender Balance	Have a minimum of 40% of each gender in our Board Team	Achieved. 57% women in the Board Team (4 women, 3 men)		Cf. Criteo's Proxy Statement
	Leadership team Gender Balance	Have a minimum of 40% of each gender in our Named Executive Officers	Achieved. 67% of our named executive officers are women.		Cf. Criteo's Proxy Statement
Benefits	Transparency on our remunerations	Disclose the Overall remuneration of the CEO compared to the average employee	Achieved.		Cf. Criteo's Proxy Statement
	Leadership team accountability	Link our Leadership Team Remuneration to sustainability performance indicators (DEI & Environment) by the end of 2024	In progress.		Cf. Criteo's Compensation Committee Charter

#### e. Contribution to Sustainable Development Goals (SDGs)

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 United Nations' 2030 Sustainable Development Goals (SDGs)**, an internationally recognized framework that is essential for building a strong and relevant CSR strategy. Criteo's commitment to the United Nations' SDGs, particularly towards SDG 4, 5, 8, 9, 10, 12, 13, and 17, is summarized in a diagram available [here](#).

#### 4. Our Awards and Recognitions

*Recent CSR awards:*

- 2022: EcoVadis Bronze Medal,
- 2022: Family Friendly Company label (France),
- 2022 Ragan Awards - "Global DEI Commitment" and "CSR / ESG Engagement Communication",
- 2022 Top 50 Inspiring Workplaces (NOAM): We ranked #12,
- 2023: Bloomberg Gender-Equality Index member,
- 2023: Diversio DEI Certification Level 1 – "Inclusive Employer",
- 2023: TLC Lions Being Human Awards 2023 - "Most Human HR Strategy".

More information regarding our CSR and DEI awards can be found [here](#).

Criteo CEO, Megan Clarcken was named an honoree for Campaign US' Female Frontier Award for the "Leading the Change" category. She was also featured on the 2022 HERoes 100 Women Role Model List for her promotion of Diversity, Equity, and Inclusion. Additionally, Justine Tabarin, Senior Manager, Global CSR and Environment, was listed on the HERoes Top 100 Women Future Leaders for 2022 for her instrumental role in developing CSR initiatives across the company.

In 2022, Antoine Mercadal, Senior Director, Internal Communications & Events and Sponsor of the Pride Community, and Celia Navarro, Senior Manager, Talent Acquisition R&D & Product, and Local Leader of the Pride Community in France, were laureates of the **LGBT+ Role Model Leaders** category in 2022, organized by the French Association L'Autre Cercle. Moreover, in 2022, Dominik Rempalik, Senior Manager, Ops Incubation EMEA and Global Co-Lead of the Pride Community made the **Yahoo Finance list of Top 100 LGBT Future Leaders**. Last but not least, in 2022, the Pride Community was shortlisted as the **Employee Network of the Year** at the European Diversity Awards.

In June 2022, Criteo was proud to be certified a "Family Friendly Company" by the **Family Friendly Company label** created by the French association Ensemble pour l'Education de la Petite Enfance (*Together for Early Childhood Education*, more information available [here](#)).



# Environment

## II. Reduce Criteo's Environmental Impact

### 1. Criteo's Environmental Approach in Addressing Climate Change

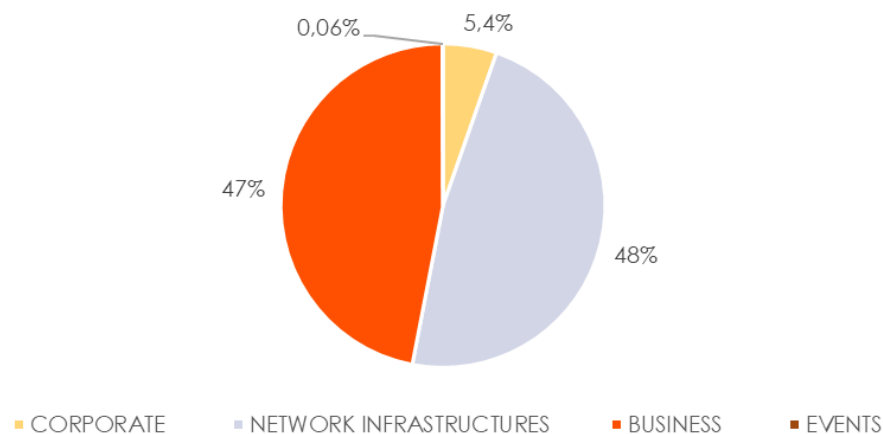
2022 was an important year for formalizing **our long-term, global environmental strategy**, one of our **top priorities**. This new strategy was built thanks to the involvement of the Leadership Team and many employees across the company, and it will pave the way for **ambitious short-term and long-term action plans and energy-reduction goals**.

Our new environmental strategy is first and foremost the result of extensive work undertaken throughout the year, which allowed us to develop a snapshot of Criteo's activities and measure their impact on the environment. As part of this process, external climate experts calculated and measured our overall carbon footprint (scope 1, 2 and 3). This carbon footprint assessment, carried out according to the Greenhouse Gas Protocol (GHG Protocol), determines the main sources of emissions in our value chain and therefore pinpoints the most relevant decarbonization drivers for the years to come.

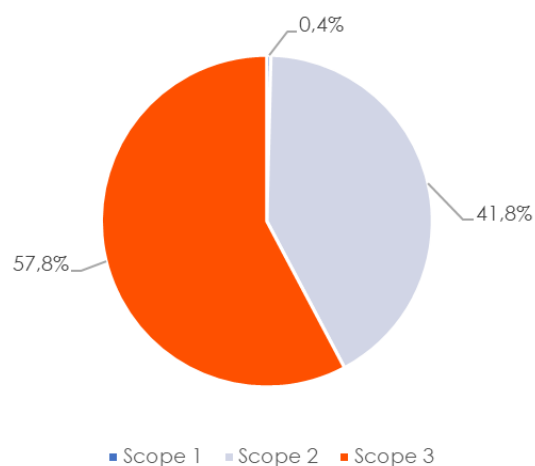
The assessment was conducted in 2022 for our 2021 carbon data. The 2022 carbon footprint for scopes 1, 2 and 3 will be calculated in 2023 and will be disclosed in next year's CSR Report.

2021 carbon footprint: 83,021 tCO<sub>2eq</sub> (scope 1, 2 and 3)

2021 CARBON FOOTPRINT BY PERIMETER OF ACTIVITIES



## 2021 CARBON FOOTPRINT BY SCOPE



Compared to revenue, the ratio of Criteo's carbon footprint for scopes 1, 2 and 3 in 2021 thus amounted to **37 tCO<sub>2eq</sub>/million \$**.

As the results show, approximately 95% of Criteo's 2021 GHG<sup>11</sup> emissions were induced by the network infrastructures and business perimeters (use of the Criteo solution), and almost all the emissions came from scopes 2 and 3.

When diving deeply into the assessment, we observe that:

- Electricity purchases (scope 2) accounted for **42%** of total emissions,
- Use of products sold (scope 3) accounted for **47%** of total emissions,
- Finally, the purchase of products and services and capital goods accounted for around 9% of total emissions.

The results highlight the need for Criteo to be involved throughout its value chain to reduce its environmental footprint.

Following this assessment, Criteo established a dedicated environmental roadmap. The development of this roadmap was made possible thanks to the involvement of a large number of Criteo's internal teams throughout the project. As a result, several short, medium, and long-term actions covering the various GHG items were identified, validated internally, and are now presented on Criteo's website.

Criteo also participates in leading initiatives that aim to reduce the tech industry's environmental impact. One such initiative is the **Planet Tech'Care Manifesto** (signed with the French Association Numeum<sup>12</sup>). This initiative brings together players from the French digital ecosystem who have committed to reducing their environmental footprint.

Additionally, since April 2020, Nicolas Rieul, Managing Director of Criteo South-Europe, sits as a chair member of **the Interactive Advertising Bureau France (IAB France)** – a leading industry trade body in France. Within this engagement, working groups in Europe are **measuring the environmental impact of digital advertising campaigns** and developing solutions to **mitigate their inherent risks**. IAB France

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<sup>11</sup> Greenhouse Gas.

<sup>12</sup> Numeum (previously called "Syntech numérique").



will deliver a standardized framework to measure the carbon footprint of ad campaigns in 2023. In fact, for some years now, Criteo has observed growing expectations from regulators and in public opinion on reducing the sector's environmental impact. We will continue to engage with policymakers to encourage greener industry standards.

In 2022, Criteo published its Greenhouse Gas Emissions Report ([BEGES](#)) on the French Agency for the Ecological Transition (ADEME) website, based on the full carbon footprint calculated for 2021 and presented above.

## 2. Environmental Impact of Data Centers and Hardware

### *a. Energy Consumption and GHG Emissions due to Data Centers*

Criteo's operations rely on **large data center units and several smaller networking rooms**, also known as **Points of Presence (POPs)**. In 2022, Criteo had its servers installed in 13 data centers (DCs) worldwide, all belonging to external service suppliers. Among those 13 data centers, 10 are data processing centers, and the remaining 3 host network POPs. Criteo's server infrastructure accounts for one of its largest environmental impacts (48% of Criteo's overall carbon footprint, and more than **98%** of Criteo's total energy consumption). A team dedicated to capacity planning oversees the optimal allocation of infrastructure resources according to business objectives, dedicated full-time to optimizing Criteo's infrastructure usage regarding costs and power usage.

**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 **responding to future business growth**. The rightsizing operations undertaken in 2021 were continued in 2022. For example, the Singapore data center became fully operational in 2022, replacing the data center in Hong Kong. New data centers have also been set up in Amsterdam and Paris to replace the old ones.

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). In addition, Criteo is working on a new design that allows data centers to be more modular — we can now better adjust the capacity used according to business needs and thus improve energy efficiency. This new design is currently used for the Singapore data center, the first of its kind back at Criteo.

Beyond energy efficiency, the overall environmental footprint of the server infrastructure “from the cradle to the grave” must also be considered when identifying the characteristics that will result in minimal environmental impacts. That is why Criteo assesses its **carbon footprint covering the entire lifecycle of its infrastructure specifically**, in addition to the company-wide carbon footprint assessment (see 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 possible<sup>13</sup>.

Criteo actively seeks to enhance **sustainable practices among vendors of services** (hosting and hardware recycling) as well as **hardware procurement**. For each new project, Criteo releases a

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<sup>13</sup> See the dedicated paragraph about e-waste management.

request for proposal (RFP), and sustainability is one of the main criteria of the decision matrix. This criterion encompasses questions about energy-saving processes, sources of energy of the data center, power usage effectiveness (PUE)<sup>14</sup>, which shouldn't exceed a rate of 2, sustainability strategy or programs of the providers, and other related topics. For instance, all data centers are covered by international certifications related to energy efficiency<sup>15</sup>. The hardware devices we purchase require open-source possibilities to avoid software end-of-life limitations and increase hardware reparability and spare part availability.

In 2022, we continued our efforts to improve energy consumption monitoring and are now autonomous to retrieve data directly from data centers. Data is collected automatically in real-time, with better accuracy, as it can now be tracked at the rack level (not only at the room level). This new process improves data reliability and real-time visibility on all data centers' energy consumption, and thus helps to define action plans tailored to Criteo's actual consumptions. For now, the data center energy consumption results for 2022 are still based on provider's data and are presented below.

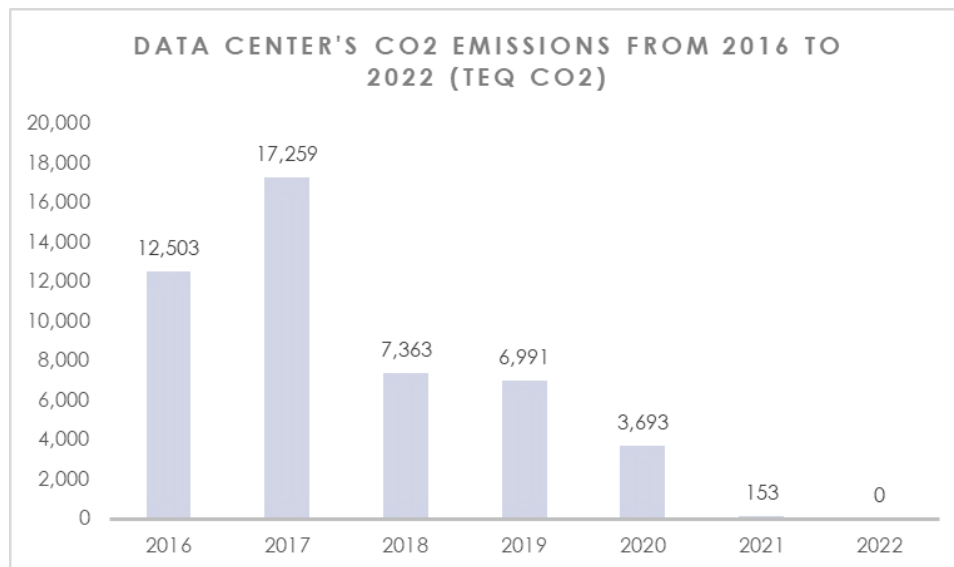
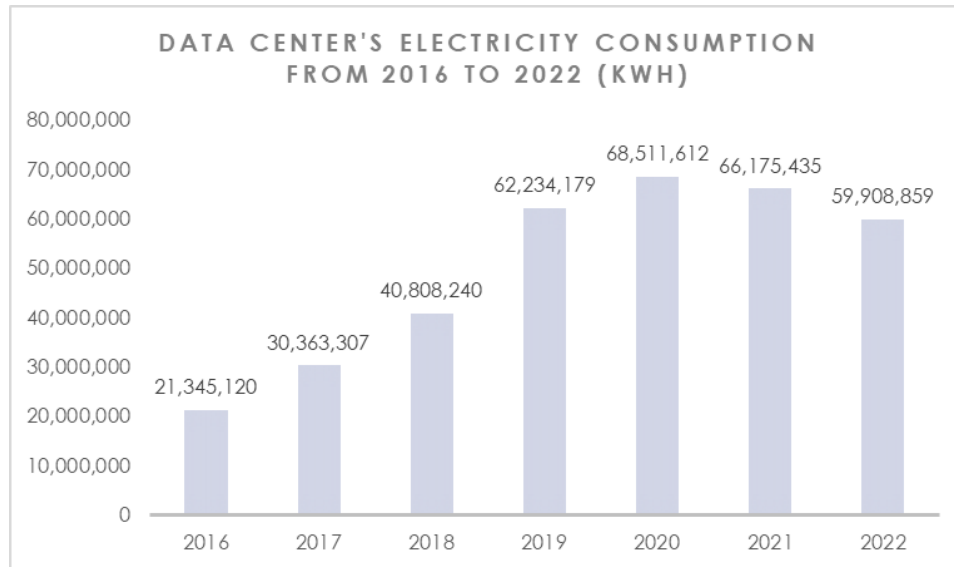
Electricity consumption and CO <sub>2</sub> emissions in DCs	2021	2022	Var.
Total electricity consumption	66,175 MWh	59,909 MWh	- 9.5%
Share of decarbonized energy	99.7%	100%	+0.3%
<i>Share of electricity from renewable energy sources</i>	—	24%	N/A
<i>Share of electricity offset through certificates</i>	—	76%	N/A
CO <sub>2</sub> emissions generated by data centers (post offsetting efforts) <sup>16</sup>	153 tCO <sub>2eq</sub>	0 tCO <sub>2eq</sub>	- 100%

While the **electricity consumption of data centers has increased** since 2016 as a result of our activity growth, when compared to revenue, **this indicator remains stable with 30MWh per million USD in 2022**, compared to 29MWh per million USD in 2021. The related CO<sub>2</sub> emissions are similarly controlled and have kept decreasing thanks to our efforts in reducing the carbon footprint, as shown in the graphs below. When we cannot supply data centers directly with decarbonized energy, we offset the carbon emissions by buying renewable energy certificates.

14 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.

15 LEED, USA EnergyStar, ISO 50001, ISO 140001, ISO45001:2018, SS564:2010, BCA-IMDA

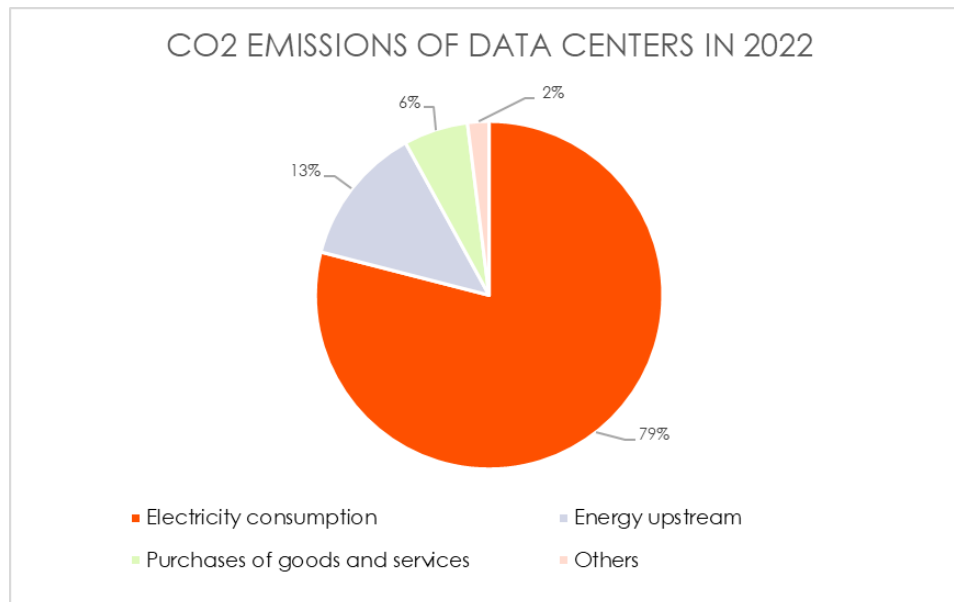
16 Regarding the calculation method of CO<sub>2</sub> emissions, for data centers totally powered with renewable energy or for where we use renewable energy certificates to offset emissions, the emissions are considered to be zero. For the other data centers the local factor is used (for more details, see methodological note).



As of 2022, 100% of the data centers' energy consumption is supplied from decarbonized sources or offset through certificates. Criteo now compensates 100% of the Singapore data center energy.

Based on Criteo's specific assessment of the carbon footprint for the entire lifecycle of the IT Infrastructure, it remains **distributed between scope 2 (power usage) and scope 3 (manufacturing and end-of-life) with respectively 84% and 16% emissions in 2022**. However, we observe a decrease in the share of scope 3 emissions for IT infrastructure compared to last year (25 % in 2021). Indeed, less servers were purchased in 2022 and Criteo privileged the reuse and relocation of decommissioned servers. This strategy has allowed us to save 6% of CO<sub>2</sub> emissions despite the opening of two data centers in the EMEA region. 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 continue its efforts on the optimization of scope 3 emissions.

2022 data: 40 000 tons of CO<sub>2eq</sub> (compared to 43 000 tons of CO<sub>2eq</sub> in 2021)



The perimeter of each emission category is defined below<sup>17</sup>:

- 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.

Lastly, another factor to consider in the environmental impact of data centers is their water consumption. In 2022, Criteo was able to obtain for the first time an estimate of the data center **water usage**, which amounts to **60 million L**. This result covers all data centers. Data was either directly provided by the data centers or had to be estimated when it was not available, using the industry average value for the Water Usage Effectiveness ("WUE") multiplied by the annual power consumption of the corresponding data centers. The calculation made effectively uses the least favorable hypotheses for water consumption, and it should be noted that the actual data center water usage might be lower than the figure provided here; Criteo will endeavor in future years to collect more accurate data for this information.

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<sup>17</sup> 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*

### *Data centers*

Since 2016, to reduce the amount of e-waste<sup>18</sup> 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.** 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. For example, in the case of the new data center in Singapore, Criteo used equipment from other locations which amounted to 69% of the total amount of servers needed for the site opening.

In 2022, 55.2 tons of assets related to infrastructure activities were decommissioned. Among these 55.0 tons, 52.7 tons of them were put back on the market. Finally, Criteo produced 2.5 tons of e-waste, compared to 9.0 tons in 2021, due to infrastructure activities.

### *Information technology (IT)*

Other e-waste from the workplace, such as employees' phones and computers, is not discarded at the end-of-life but instead given or sold back to a reseller. As a result, **Criteo's actions allowed for the refurbishment of 244 kgs and the recycling of 6.31 tons of office e-waste in 2022.**

## *3. Environmental Impact of Offices and Travel*

### *a. Green Offices*

#### *Buildings certifications*

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<sup>19</sup> or BREEAM<sup>20</sup>. Thus, many of our offices were built according to high environmental quality building norms<sup>21</sup>.

**In 2022, the equivalent of 66% of our leased offices are covered by a green certification based on office area in m<sup>2</sup> (compared to 69% in 2021).**

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.

#### *Natural resources consumption for offices and waste*

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<sup>18</sup> Electronic waste, or commonly called "e-waste", describes discarded electrical components or electronic devices.

<sup>19</sup> Leadership in Energy and Environmental Design (LEED).

<sup>20</sup> BRE Environmental Assessment Method (BREEAM).

<sup>21</sup> In Paris, the building housing Criteo's headquarters is NF HQE certified. The Singapore office is in a building that has been awarded the prestigious Green Mark Platinum Award. The Barcelona office is in a LEED Gold building property while the Boston office is part of a LEED Platinum building. Criteo's Los Angeles building was honored by Culver City's City Council and local utility representatives as a Sustainable Business Innovator. Our London office is in a BREEAM certified building.

Due to its service-oriented activity, Criteo's main direct use of natural resources besides energy relates to paper and water. Regarding water, Criteo deployed sustainable practices in most offices by using sensor-equipped faucets and two-level flushing toilets. Criteo also promotes a paperless work environment, using digital signature or digital collaboration tools, for example. All of our offices sort and recycle waste<sup>22</sup> whenever possible, and clear signs about waste classification are on display in most offices.

In 2022, Criteo was able to obtain a first estimate of its leased-office water consumption, which amounts to 4,758 m<sup>3</sup>. For offices with less than 50 employees or where actual data was not available, the data was estimated based on the average water consumption per employee. Criteo will strive to collect more accurate data for this information in the coming years.

### *b. Optimizing Use of Office Space and Real Estate Footprint*

With Criteo's new **Flexible Work Approach** (see section V.1.), we continued to optimize workspaces around the world – for instance, by relocating some offices to co-working spaces (e.g., Boston, Sao Paulo). All workspace changes implemented are done in consultation with employees and following behavioral studies to ensure that employees can continue to work in the best conditions.

In locations where Criteo does not have specific workspaces (leased offices or coworking spaces) a pilot program, called "Upflex", was launched in 2022. Under this program, Criteo employees have access to a large portfolio of co-working spaces where they can book a desk, allowing them to work away from home when necessary and reduce their commuting time.

### *c. Energy Consumption due to Offices*

Criteo takes numerous actions aimed at reducing the energy consumption of offices, such as automatically switching lighting off at night or relying on motion sensors, using energy-efficient LED lighting, configuring all laptop's default settings to go into sleep mode when the laptop is not used and into low battery mode (lower energy consumption) when it is not plugged in.

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

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<sup>22</sup> Most offices are equipped with waste recycling bins and, in some cases, with battery recycling containers.

Electricity consumed in offices	2021	2022	Var.
Total office electricity consumption	2,262 MWh	1,274 MWh	-44%
Total per employee	0.86 MWh/employee	0.41 MWh/employee	-53%
% from renewable energy sources	27%	38%	11%

Our office energy consumption has been dropping since 2020 with a significant decrease in consumption in the EMEA offices in 2022. These results are the consequence of the widespread teleworking work habits that have spread across Criteo since the pandemic and that will remain in place as part of our Flexible Work Approach (see section V.1.).

Due to the complexity of obtaining data for small offices, actual electricity consumption has been collected only for leased offices with more than 50 employees. For other offices<sup>23</sup>, data is estimated based on a ratio per employee. They account for about 9% of our total electricity consumption.

A couple of Criteo's offices (Ann Arbor, U.S. and London, UK) are using natural gas for heating. However, based on an assessment performed by Criteo in 2021, the gas consumption is not significant and represents less than 10% of our office energy consumption. For this reason, it is not taken into account in the calculation of the CO<sub>2</sub> emissions presented in the table below (but accounted for the global carbon footprint above for scope 1, 2 and 3).

#### *d. Greenhouse Gas Emissions due to Offices and Travel*

While a significant decrease in business travel was observed since the pandemic, business travel increased in 2022 despite changes in working habits. Criteo therefore continued its efforts to reduce the number and impact of these trips during the year.

Criteo limits GHG emissions by avoiding flights whenever possible, attending video conferences instead of in-person meetings, and not offering company cars in employees' compensation packages. We also look 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 offices, public transportation is subsidized to promote public transportation usage.

In 2022, flexible working has been widely practiced everywhere across the company's operations and will continue to be so as defined in our Flexible Work Approach (see section V.1.).

In 2022, all emissions related to business trips and hotels have been offset with VCS<sup>24</sup> certified credits through a partnership with the non-profit Tree-nation (see more information [here](#)).

<sup>23</sup> Offices with less than 50 employees, and coworking spaces.

<sup>24</sup> Verified Carbon Standard CO2 Certification. Learn more [here](#).

CO <sub>2</sub> emissions	2019	2020	2021	2022	Var. 2021 vs 2022
From electricity consumption (offices) – in tCO <sub>2eq</sub>	1,287 tCO <sub>2eq</sub>	887 tCO <sub>2eq</sub>	554 tCO <sub>2eq</sub>	303 tCO <sub>2eq</sub>	-45%
From business trips <sup>25</sup> – in tCO <sub>2eq</sub>	7,741 tCO <sub>2eq</sub>	1,234 tCO <sub>2eq</sub>	370 tCO <sub>2eq</sub>	2,318 tCO <sub>2eq</sub>	+526%
Carbon footprint per employee (offices consumption + business trips) – in tCO <sub>2eq</sub> /employee	3.6 tCO <sub>2eq</sub> /employee	0.81 tCO <sub>2eq</sub> /employee	0.35 tCO <sub>2eq</sub> /employee	0.84 tCO <sub>2eq</sub> /employee	+139%

There has been a sharp increase in emissions from business trips in 2022. Indeed, compared to the beginning of the pandemic, business trips are more frequent and the organization of the annual event in Croatia has also contributed to the increase in emissions.

#### *e. Employees' Green Initiatives*

Historically, Criteo has relied a lot on local initiatives to promote environmental responsibility, led by employees. Since 2020, Criteo Cares initiatives have spread across all business units and countries. Find out more about the Green Community and Environment at Criteo below and [here](#).

The **Green Community** aims to raise awareness of climate change and support the company's transformation to a more responsible future. Our group of nearly 500 passionate volunteers leads actions during celebrations such as Earth Day, with, for instance, clean-ups held in seven cities and by collecting 159.8 kg of waste in 2022.

Our Chief People Officer and Chief Technology Officer, both Executive Sponsors of the Green Community, regularly participated in community events such as Clean Up missions, Earth Day talks, etc.

On top of that, our community also develops awareness content such as the Green Guidelines, which provide tips for our employees in adopting environmentally friendly behaviors in the office. Also, the Green Community was instrumental in defining Criteo's environmental strategy (see section II.).

<sup>25</sup> Business trips include business trips by plane and business trips by train.



## Social

### III. Investing in Headcount and Talent Initiatives

Criteo operates in all corners of the globe and has **27** offices<sup>26</sup> across the Americas, Europe, Middle East and Africa (EMEA) as well as Asia Pacific (APAC). Over the last years, we have kept our talents growing, which means investing in our current 3,335 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, 2022, **Criteo had 3,335 employees globally**. This figure includes all of Criteo's active employees on December 31, 2022 (permanent and non-permanent employees). Compared with the 2,810 employees at the end of December 2021, Criteo's workforce has grown by 19% in 2022.

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 scope CSR of the CSR report in year N+1. As of December 31, 2022, the entities included in the scope of the CSR Report accounted for **93% of Criteo's total headcount**, *i.e.*, **3,113 employees** (compared to 2,624 at the end of 2021).

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<sup>26</sup> Offices, including coworking spaces:

- (15) EMEA - Milan, Madrid, Barcelona, Stockholm, Amsterdam, Munich, Berlin, London, Paris, Grenoble, Bordeaux, Tel Aviv, Limassol, Yerevan, Dubai.
- (7) APAC - Tokyo, Singapore, Sydney, Osaka, Gurgaon, Beijing, Seoul.
- (5) AMERICAS – New York, Miami, Boston, Ann Arbor, Sao Paulo.

CRITEO	2021				2022				Var.
Entity	Women	Men	Non-binary	Total	Women	Men	Non-binary	Total	
APAC									
Criteo KK (Japan)	61	65	0	126	67	75	0	142	13%
Criteo Singapore Pte. Ltd. (Singapore)	34	25	0	59	45	26	0	71	20%
Criteo India Pvt Ltd. (India)	30	65	0	95	46	101	0	147	55%
Criteo Korea Ltd. (South Korea)	24	27	0	51	32	30	0	62	22%
AMERICAS									
Criteo Corp. (United States)	290	365	0	655	366	408	2	776	18%
Criteo do Brazil LTDA (Brazil)	25	34	0	59	35	43	0	78	32%
EMEA									
Criteo Europa S.L. (Spain)	229	206	0	435	312	295	1	608	40%
Criteo Ltd (UK)	30	40	0	70	45	51	0	96	37%
Criteo GmbH (Germany)	35	46	0	81	51	43	0	94	16%
Criteo France SAS (France)	58	59	0	117	31	23	0	54	-54%
Criteo Technology (France)	N/A	N/A	N/A	N/A	305	680	0	985	N/A
Criteo SA (France)	269	606	1	876	N/A	N/A	N/A	N/A	N/A
Total	1,085	1,538	1	2,624	1,335	1,775	3	3,113	19%

In 2022, Criteo acquired the business of IPONWEB, which includes nine subsidiaries. However, in accordance with the methodology for defining the scope of the CSR Report, the data presented inhere does not include IPONWEB-related information, except for the above table. IPONWEB data will be disclosed in the CSR report relating to 2023.

IPONWEB	2021				2022				Var.
Entity	Women	Men	Non-binary	Total	Women	Men	Non-binary	Total	
IPONWEB	N/A	N/A	N/A	N/A	111	298	0	409	N/A

As of December 31, 2022, the **1,335 women** in our headcount represented **43% of the total workforce of 3,113 employees**<sup>27</sup>. Young people (below 35) account for most of Criteo's employees, which is expected in a high-tech company relying on a workforce with skills in the latest trending technologies.

Workforce breakdown by age	2021	2022
Under 25	144	142
Between 25 and 29	657	824
Between 30 and 34	795	938
Between 35 and 39	519	629
Between 40 and 44	289	316
Between 45 and 49	133	163
50 and above	87	101
<b>Total</b>	<b>2,624</b>	<b>3,113</b>

## 2. Recruitment and Terminations

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

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 our recruiters and the Employer Brand team to manage external talent pools (such as interns) in a strategic, efficient, consistent, and compliant way.

Our **Employer Value Proposition** is presented in Criteo's Culture Book that captures what makes us special with clients, partners, and future talents, based on feedback from employees and leaders at Criteo.

Criteo has made recruitment for the Research and Development (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 on researching, connecting, and attracting job candidates to convert individuals into job

<sup>27</sup> Same as all headcount-related data that will be disclosed further in this report, this percentage is calculated on the CSR scope.

applicants. The R&D TA team partners closely with the Tech Hiring Guild<sup>28</sup>, whose purpose is to continually evaluate and ensure a robust process for the assessment of technical skills as part of the hiring process. **The R&D team identifies and attracts candidates before they graduate through our Campus program.** In 2022, this program has resulted in the recruitment of 42 interns and apprentices in the R&D team, 13 in the Product team, in addition to the 100 interns that Criteo recruits every year in sales and corporate functions aside from this program. In 2022, Criteo partnered with 6 schools<sup>29</sup> in France and participated in 6 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. Two Campus Program specialists have been hired in 2022 to focus on this topic.

In 2022, 548 employees exited the company and **986** were hired across the globe.

New Hires & Terminations	2021	2022	Var.
New Hires	943	986	5%
Terminations	770	548	-29%
Employee's initiative	527	327	
Employer's initiative <sup>30</sup>	128	93	
Other (e.g., end of fixed-term contract)	115	128	

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. Thanks to those analytics it is easier to predict attrition rates depending on geographic areas and populations. More importantly, they enable us to adjust human resources accordingly to Criteo's business needs.

We are proud to observe that in 2022, the turnover rate has decreased significantly compared to 2021, demonstrating that our efforts to better retain our employees are paying off.

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

<sup>28</sup> The Tech Hiring Guild is an internal group which consists of Engineers and Talent Acquisition experts. This group meets every two weeks to challenge and continuously improve the recruiting process. Whether it's about the process flow, renewing coding exercises, improving the candidate experience, etc.

<sup>29</sup> Polytech, EPITA, Ensimag, Centrale Supélec, MVA, Ada Tech School.

<sup>30</sup> Including redundancies and restructuration.

### 3. Compensation and 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 Compensation Guidelines** to ensure that compensation offered is competitive compared to the market, depending on jobs and expertise levels, geographical areas, *etc.* This official document is enforced by Criteo's Compensation & Benefits team, who monitors the market and performs salary surveys for all components of employees' remuneration. They conduct a yearly review of salary levels across the company, ensuring notably that compensation abides by the Global Compensation Guidelines. The Compensation and Benefits team also oversees practices across Criteo's entities, taking into account country-level specificities with the help of local People teams.

In 2022, annual base and variable salary compensation payouts for the legal entities included in this CSR Report were €283,871,182<sup>31</sup> – a 27.44% increase compared to €222,742,522 in 2021 (CSR report 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, or location. Every year, a **comprehensive analysis of salary levels across Criteo is undertaken**. The purpose of this analysis is to assess the competitiveness of an employee's base salary compared to the market salary for equivalent positions, as well as to improve our understanding of the potential residual differences in salaries between men and women.

Criteo dedicates specific budgets to bridge the gap between the alignment of employees within teams (woman vs man, new joiners vs tenured employees, or any other type of discrepancies that has been noticed). This annual corrective measure is **designed to support the Pay Parity Action Plan and was conducted successfully in 2022: the gap has been reduced to 0% in 2021 and maintained in 2022** (average compa-ratio of 0.94% for men and 0.94% for women before calibration).

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

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<sup>31</sup> Criteo SA is included in the calculation of the global amount of remuneration in 2022.

The purview of our Pay Parity Action Plan comprises the following areas:

At hiring	At merit cycle	At promotion & mobility	After a leave of absence
<ul style="list-style-type: none"> <li>- Ensure pay equity by running quarterly analysis on New Hire offers per gender</li> <li>- Training for managers</li> </ul>	<ul style="list-style-type: none"> <li>- Ensure balanced performance rating distribution per gender</li> <li>- Ensure average increase is balanced between women and men employees based on performance as well</li> </ul>	<ul style="list-style-type: none"> <li>- Ensure equal access to promotion and internal mobility opportunities</li> <li>- Perform analysis on average increase proposed during promotion based on gender</li> </ul>	<ul style="list-style-type: none"> <li>- Ensure compensation analysis conducted upon return of leave of absence</li> <li>- Specific to maternity – ensure women in maternity leave receive an increase as any other employees during cycles</li> <li>- Offer a career discussion when employees return from leave</li> </ul>

As per French regulations, we disclosed our **Women-Men Equality Index for France** again in 2022 (which reaches **87 out of 100** in 2022). 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. Some of the major topics addressed by the Compensation & Benefits roadmap are in line with Criteo's DEI strategy and are presented in section V.3. (e.g., Employee Assistance & Work-life Program and the expanded Carrot Fertility & Family Forming Program).

For instance, the team launched a pilot program to support the fitness and wellbeing of employees in three countries where there was not an associated benefit. It includes a monthly stipend to be used on a wide range of wellbeing products and services. At every insurance or program renewal, we evaluate for market competitiveness leading to enhancements in 2022, increased coverage level in life insurance in India, addition of telehealth in Canada, and increases in lunch voucher amounts in Brazil.

#### 4. Skills Management and Development

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

### *a. In-class Training 2022 Highlights*

#### *Top Talent Program “Leadership Journey”*

The “**Leadership Journey**” is a six-month program tailored to key talent that was renewed for the second time in 2022. In 2022, 30 participants followed a full training program, including workshops, learning expeditions, e-learnings, individual and group coaching.

The program's objectives are to **build leadership capabilities**, accelerate business effectiveness and success, create development and growth opportunities, expand the Criteo community and network, and foster our culture, values and key behaviors. One additional dimension of the program in 2022 focused on being able to contribute to Criteo’s sustainable growth.

#### *Manager development*

Criteo continued to expand the **Manager@Criteo** program in 2022, which aims to support new managers within Criteo's teams. The program includes three different tracks:

- **Future makers:** a six-month skills development journey that 60 managers currently attend, with the aim of developing key management skills and creating new leadership habits that lead to sustained and measurable differences for the business.
- **People processes:** this track will be launched early 2023 and will be mandatory for all managers, and therefore included in the onboarding process for newcomer managers.
- **Manager circles:** these groups allow connection, social learning and sharing of best practices between managers. All managers are invited to join this group whether they are hired as a manager or promoted into a management role.

#### *In-class solution based on Individual Development Plan*

Criteo provides employees with an extensive **catalog of in-class training**. This catalog is aligned with employees' individual development plans and is updated annually to provide the most relevant content to their needs and expectations. Employees can freely enroll in the in-class training courses that are available in the catalog. For example, a training course is offered to help them get used to the new Flexible Work Approach (see section V.1).

Although this Report focuses on formal training activities, much **more is happening in the field and our 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
2022	11,187	11,187	3.8	7.3	49%	215	0.07
2021	10,107	5,822	3.9	6.2	62%	302	0.1
% evolution	+11%	+92%	-1.4%	+17%	-13%	-29%	-37%

The overall increase in training hours is due both to the development of Criteo's offering of training programs in the learning platform "Learning Quest" (2,509 pieces of digital/workshops training offered in 2021 compared to 3,204 in 2022), and to a reinforcement of the L&D team with a stronger presence in our main regions (APAC, Americas and EMEA), leading to better visibility for employees regarding the training offer.

### *b. Online Training 2022 Highlights*

Criteo provides all employees with **5 online training platforms**<sup>32</sup> which provide access to over 100,000 training courses and allow free registration to workshops.

In 2022, Criteo also continued to deploy a **Learning Management System (LMS)** internally called "**Learning Quest**". This platform allows for more flexibility in the creation and management of content, thus limiting the outsourcing of the creation process and allowing it to adapt in real-time to employees' training needs. A key benefit of Learning Quest is that most training workshops and events are registered there, offering a single-entry point for users, better reporting on training completion, and thus improved management of individual training paths.

Other key online training activities in 2022 include the **Commerce Media Platform (CMP) Masterclass**. As Criteo moves forward with becoming the world's leading Commerce Media Platform, we believe it is essential for employees to understand the industry landscape and Criteo's strategy and solutions. The CMP Masterclasses is a strongly recommended training program that launched in 2021 and is now included in the onboarding process. It allows all employees to understand the basics of Criteo's Business and Ad Tech Industry through a program composed of six modules (a total of 3,301 hours). Surveys have shown great feedback on the CMP Masterclass Program, as 96% of the learners said that they would recommend this learning path to their teams/peers.

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<sup>32</sup> Coursera, Datacamp, Speexx, LinkedIn Learning and Learning Quest.



#### Online training hours

ONLINE TRAINING	Training hours	Average training hours per employee	Average training hours per trained employee	% of trained employees
2022	23,641	8.0	7.6	100%
2021	16,681	6.5	6.1	105%
% evolution	+42%	+24%	+24%	-5%

On top of the core online pieces of training above (skills development-driven), employees completed further online training that represents about 5,291 hours and covers Compliance modules (63.6% of these hours), “FlyCriteo” On-boarding modules (36.1%), CRM (0.1%) and digital literacy on collaboration applications (0.2%).

#### 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 2022, peer-to-peer learning opportunities got multiplied widely across the company through different initiatives.

The biggest global event was held in June with **Criteo Universities** (see section III.5.a.). In September, we also decided to launch our **Learning@Criteo Masterclass**: each month, employees have opportunities to attend a masterclass taught by one of their peers. Topics cover all areas of the business and beyond, for instance, recently: *What It's Like to Be a Woman in R&D*, *Developer Experience*, *A Journey of Code Change*, *Mindful Learning*, etc. We already organized more than 10 of these masterclasses with 150 attendees on average for each class.

Our **Managers’ Circle** and **Criteo Cares Community groups** also heavily focus on social learning with peer-led events such as fireside chats, leader talks, panel discussions that encourage the sharing of lived experiences and sharing of best practices.

As part of social learning, we also launched a program called “**Donut for Languages**”. This consists in establishing random matches of people willing to practice a language with peers. Currently, the program is offered in Spanish and French.

#### *d. Criteo's Coaching Offer*

At Criteo, we believe that coaching is a powerful tool to let our employees feel more empowered to develop themselves and tap into their full potential, feel good, and bring their whole self to work. Coaching is also a great tool to enable our business growth.

Thus, we developed a **3-pillar-coaching** offer to support every level's needs through coaching:

- For Individual Contributors and Team Leads:

In 2022, Criteo relaunched the internal coaching program called **"CoachMe"**, which allows the delivery of internal coaching sessions to Individual contributors and team leads around career development, work-life balance, and professional efficiency topics. It started with a pilot for people in EMEA region. By the end of Q2 2023, 60 internal coaches will be trained during specific sessions. In parallel, the program allows employees to develop their coaching skills through ICF world-class training (International Coaching Federation recognition).

- For Managers and Leaders:

Part of the **"Future Makers Program"**, managers follow a 6-month journey with one-to-one coaching sessions to work on their development goals. Their coaching journey is delivered by BetterUp, one of the leaders in the coaching market. All along the program, 240 managers & leaders will receive coaching over 2 years.

- Coaching for Executive & Senior Leaders:

Through coaching delivered by **high-quality Executive Coaches**, Executive and Senior Leaders are supported in their development and leadership capacity.

#### *e. Data Tracking and Reporting/Forecasting*

Launched in 2021, Criteo's **Learning Management System (LMS)** facilitates **data management and reporting**. The main part of the data regarding training courses carried out on all the different training platforms is collected and centralized internally through Learning Quest. As of now, 99.9% of employees are connected to the new LMS, and 99.5% of employees have been active on the platform.

The LMS also provides the ability to forecast training topics to be developed to meet employee needs. The centralization of all this data allowed the creation of tailor-made reports that can be extracted and shared with other teams (e.g., HR for employee training tracking).

## 5. Events

### *a. Global Event for All Criteo's Employees*

It is part of Criteo's culture to organize events for employees around the world to meet and share experiences together. Traditionally, Criteo regularly organizes an event for all employees called "Summit", during which "Criteo University" sessions are held. These are 45-minute lectures proposed by employees (accompanied by a mentor) to deepen a subject directly related to the company's activities.

Some examples proposed in 2022 include:

- What does "flexible work" mean, and what does it imply?
- How to resolve 4.700 tickets in one year? - Life in Campaign Management/AdOps,
- The magic behind the tech of Criteo,
- What can board gaming teach you, and how can we use it at work?
- Introducing our Sustainability & Environmental Strategy.

### *b. Hackathon*

At Criteo, we foster innovation and different ways of thinking. Our "**Hackathon**" aims to foster innovation and cross-collaboration around the globe and is one of the oldest and greatest traditions at Criteo. Every year, hundreds of employees get together for the opportunity to innovate, collaborate, get out of their comfort zone, learn new skills, and bring their ideas to life. For the 2022 Hackathon, we welcomed almost 400 employees from 25 offices, who submitted 65 projects. Several sustainability and Diversity, Equity, Inclusion oriented projects were submitted. In fact, one of these projects, "Diversity Hiring," was focused on creating a solution to help hiring managers write job descriptions and avoid non-inclusive language. This project won the competition, an indicator of how meaningful these topics are to Criteo's teams.

Moreover, the Criteo AI Lab showed off their skills by participating and winning the PEReN<sup>33</sup> Hackathon! They worked around data and Machine Learning (ML) and provided solutions and business insights.

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<sup>33</sup> PEReN is an office that sits inside the French Ministry of Economy & Finances that regulates the digital market and provides technical expertise for government departments and independent administrative authorities.

## IV. Stakeholders' Engagement and Criteo Cares Program

### *Relations with stakeholders*

Criteo works with a **wide and diverse community of internal and external stakeholders**. We maintain 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, press and non-profits. More information regarding how 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**.

### *Presentation of the Criteo Cares program*

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

Criteo Cares Program projects are **driven by 7 community groups**<sup>34</sup>:

1. Women@Criteo Community,
2. Pride Community,
3. BIPOC Community,
4. Criterable Community,
5. Parents Community,
6. Green Community,
7. Education Community.

These community groups are led by 14 active volunteers from various teams and different geographical areas and include hundreds of employees from around the world. Each Community group has its own Leadership Sponsor at executive level, a dedicated internal website and annual roadmap.

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

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<sup>34</sup> Also known as ERGs "Employee Resource Groups".

Criteo Cares program KPIs	2021	2022
Number of Criteo employees who used their VPTOs <sup>35</sup> days (at least 0,5 day)	58 employees (Approximately 2%)	613 employees (Approximately 18%)
Number of Criteo employees in the Criteo Cares Program	450 employees (Approximately 16%)	1332 employees (Approximately 40%)
Number of donations made by the employees through the "Give Back" program on Spotlight	\$14, 940 USD donated (170 donations)	\$41,240 USD donated (532 donations)

Through our volunteering and giving platform launched in 2021 and called "GIVING by Alaya<sup>36</sup>", Criteo's employees can 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 two VPTO<sup>37</sup> days. To encourage employee engagement, Criteo rolled out **daily challenges** for employees on the platform. Criteo hopes that the GIVING platform will become an increasingly important part of employee engagement.

GIVING platform KPIs	2021	2022	Targets
Number of Criteo employees registered on the platform, since the launch (Oct. 2021)	709 employees (Approximately 20%)	1,845 employees (Approximately 55%)	At least 65% of Criteo employees have created an account by the end of 2025, to maintain or increase afterwards
Number of Criteo employees who took at least one action on the platform (do good + challenge) during the year	104 employees (Approximately 15%)	655 employees (Approximately 35%)	At least 50% of Criteo employees registered on the platform who have taken at least one action by the end of 2025, to maintain or increase afterwards

<sup>35</sup> Volunteer Paid Time Off (VPTO). Criteo provides all employees with a maximum of 2 working days per year to participate in volunteering activities with local charities.

<sup>36</sup> The Alaya platform (our vendor) was acquired by Benevity in 2022.

<sup>37</sup> Volunteer Paid Time Off (VPTO).

## V. Wellbeing, Inclusion, and Diversity at Work

### 1. Safety and Wellbeing at Work

#### *Adapting to new ways of working*

Following the announcement in 2020 of a new working policy and the subsequent employee feedback we received, Criteo's new fully **Flexible Work Approach** was launched in July 2022. Aligned with our values of being Open, Together, and Impactful, this new approach is based on trust and lets employees choose to work from home, work from an office or do a mix of both — with some exceptions for employees whose on-site presence is deemed essential (e.g., IT, workplace safety). For business reasons, managers can exceptionally require employees to come to the office, but they need to respect a reasonable notice period of 5 working days.

The original COVID-19 Steering Committee created in 2020 evolved to become a **Flexible Working Steering Committee** in 2022. The governance structure of the committee was reviewed, but members continue to work on various projects such as improving the Flexible Work Approach, Employee Engagement, social event strategy, etc.

Other previous measures of Criteo's approach to remote working are still implemented today and will continue to be, either as part of the Flexible Work Approach or as additional measures. For instance, Criteo partners with an external company to provide 24/7 free<sup>38</sup> psychological support to all employees and their families and provides financial support for each employee to buy suitable remote working equipment (screens, ergonomic chairs, desks, etc.).

Criteo continues to keep every first Friday of the month meeting-free ("**Quiet Fridays**") to allow time for focus, self-development, reflection, and learning. We also provide learning resources to all employees to support healthy and effective working habits in a flexible work environment, including recommendations for employees and managers for successful hybrid work, safety tips for working from home, guidelines for effective virtual meetings, and many resources to support everyone's balance through breaks and disconnection.

#### *Promoting employee wellbeing*

We are convinced that wellbeing at work ultimately results from a wide array of initiatives, such as the Flexible Work Approach mentioned above or Criteo's commitments as part of the company's Diversity, Equity and Inclusion policy (see section V.3.). In 2022, Criteo has created the role of a **Global Well-being Manager** to increase our efforts to support employees' physical and mental wellbeing at a global level, balancing business needs with everyone's personal commitments, needs, and preferences. Throughout the year, different initiatives have been launched and implemented. For instance, we have implemented a **bi-annual process for employees to provide feedback on their well-being, work-life balance, and workload** through a questionnaire and have a follow-up one-to-one conversation with their manager to discuss their well-being at work and agree on actions if needed. Unlike the engagement survey, the feedback and the conversations are not anonymous and allow for

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<sup>38</sup> The 24/7 helpline is always available for free with no limit for immediate support. There are limits though when it comes to an actual one-to-one therapy session. In this case employees can get up to 6 sessions with a specialist to work on stress reduction programs, up to 5 sessions with a counsellor and up to 3 sessions with a professional life coach.

personalized follow-up. This process is not mandatory, although Criteo highly encourages all employees to participate. In 2022, 72% of employees provided their feedback through the questionnaire, and more than 1,500 employees confirmed they had a one-to-one follow-up conversation with their manager. To help managers carry out those conversations, specific training and resources were made available. Employees can also request a dedicated conversation with their **People Business Partner** to address additional feedback or discuss any concerns. Through this initiative, Criteo voluntarily extends the company's response to a French regulatory expectation to all employees worldwide.

In addition, Criteo has rolled out several initiatives to raise awareness about mental health such as our "Mental Health Weeks" in December 2022, organized by the Criterable Community (see section III.f.) and create a safe space for employees to raise mental health concerns.

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

In addition to this external support, in 2022, Criteo introduced an internal support network of Mental Health First Aiders composed of Criteo employees who have completed a training course to learn more about the most common mental health issues, understand how to identify mental health issues and learn how to conduct non-judgmental conversations. They can act as a first point of contact for colleagues who are struggling with their mental health or going through a crisis and can signpost them to professional support if needed. In 2022, 22 employees globally have received their certification, and we plan to grow this support network to 90+ Mental Health First Aiders in 2023. To give every employee the opportunity to proactively support their well-being and learn healthy working habits, we also offer **well-being-related training** through our training catalogue including topics like mindfulness, resilience, or stress management.

Criteo continues to offer monthly "**Feel Good Sessions**" to employees in all regions — dedicated opportunities to disconnect from work, learn about well-being-related topics, exercise, have fun, learn, and discover new things. These sessions are organized with external experts.

Lastly, since 2022, every Criteo employee and two friends or family members can freely access the **Headspace application**. After the successful pilot in 2021, this offer is now used by more than 1,300 enrolled members. Headspace offers content around mindfulness, meditation, workouts, sleep, nutrition, and much more. Employees mostly use this service for meditation and support for better sleep and, on average, they engage five times per month with the app.

In addition, regions are allocated a **dedicated budget to encourage employees to exercise**, by providing employees with opportunities to exercise using social, low-cost services, and with virtual wellness activities such as yoga, or virtual sports classes. Most offices provide standing desks to employees without requiring a medical prescription or specific ergonomic seating, which requires a medical prescription. Based on individual needs, these special appliances enhance overall comfort in the workspace.



## *Safety at work*

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

In 2021, the H&S Team supported the business in issuing two new **policies** that are presented in last year's report [here](#).

The safety of employees travelling for business is another important issue. Criteo relies on an **International SOS Assistance tool** to complement the existing employee emergency assistance with AXA healthcare. This tool acts as a 24/7 hotline for support on security issues, especially when travelling. It tracks all Criteo travelers so that they can be identified and Criteo can reach out to them in case of an emergency<sup>39</sup>.

## 2. Employee Relations

### *a. Internal Communication*

Twice a quarter, Criteo hosts a **"Global All Hands"** which are **webinar-style meetings** that give the **Leadership Team** a platform to share the strategy and other important information with employees **all over the world**. We also run **specific sessions** titled **"Earnings"** each quarter to discuss Criteo's **financial results**. During these events, they provide key business updates and allow employees to ask questions. Additionally, each team has regular functional **"All Hands"** to cascade further information on key business priorities and performance metrics.

When it comes to changes involving systems, processes, or other issues impacting employees, these are communicated in **interactive sessions** to supplement emails on the topic, allowing employees to ask questions or raise concerns. In addition, all functions and all offices have instant messaging channels to communicate real-time updates and feedback to employees.

Social media channels are also used to inform both external and internal populations. In 2020 we implemented an **internal social media platform**, **"Sociabble"**, to **inform employees in a more interactive format**. As of December 2022, all employees are connected to the platform, with around 60% of active users.

The **global intranet**, called **"myCriteo"**, gathers many functional portals and allows employees to easily access all information needed. For instance, the **People Portal** is an HR intranet portal meant to allow employees access to HR-related information, policies, and contacts, including both global-level and country-level specific information.

Another example is the user-friendly ticketing solution that is **used by employees to ask HR-related**

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<sup>39</sup> The International SOS Traveler Tracker website allows us to identify our employees who are in a risk area. Depending on the level of risk, either ISOS takes the initiative to contact the concerned employees by email/text/phone to ensure they are safe or Criteo can send personalized messages from the ISOS platform.

questions (policy, benefits, etc.). Internal IT proposes a similar user-friendly ticketing solution to assist employees with any IT-related questions/topics.

To allow networking among Employees despite the work-from-home context, Criteo continued in 2022 the **“Donut” program** launched in 2020: a matching system based on instant messaging channels. This year we facilitated the meeting and networking of more than 900 employees.

### *b. Culture of Feedback and Engagement*

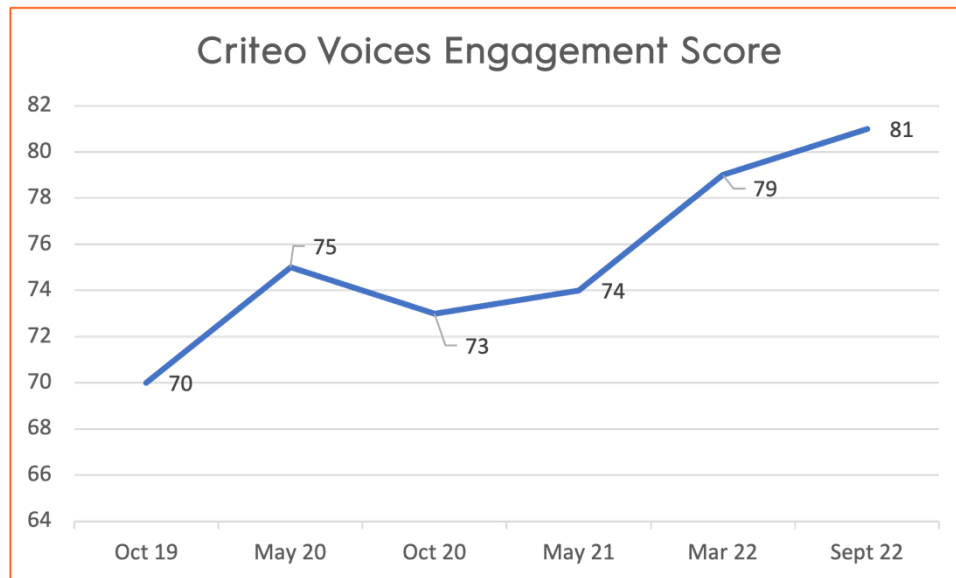
At Criteo, we strive to create a culture of feedback and continuous learning. We therefore promote feedback at different levels of the organization as an important part of our company culture: for instance, the People team supports managers and employees through **dedicated training to give and receive feedback in a constructive way**. As part of this effort, the **biannual cycle for the Performance Review process includes additional frequent feedback conversations** between managers and employees, and a mid-year touchpoint for all employees.

In addition to the individual feedback collection process for every employee, we also have programs in place to collect feedback on the employee experience to continue to improve as an organization. It includes **onboarding and exit feedback surveys** to get a good understanding of the onboarding experience and the reasons why people leave the company, and how we can continue to 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 address potential issues. In 2022, we learned that people continue to join Criteo for our strong culture and because they feel that our company genuinely cares for its employees. We learned that we have opportunities to focus on total rewards and missing career opportunities which were cited as the main reasons for people to leave Criteo, and this is driving our continued focus to improve employee retention.

Criteo also regularly runs **company-wide employee surveys to measure engagement** over time and understand our strengths and areas for improvement. In 2022, we conducted one full engagement survey in March and one pulse survey in September, with respectively **75% and 65% response rates**. In both surveys, we measure **employee engagement** by asking two questions:

- How happy are you working at Criteo?
- Would you recommend Criteo as a great place to work?

In September 2022, we were proud to see our overall **engagement score** landed at **81/100** points (+2 points compared to March 2022, + 7 points compared to 2021), 7 points above the tech industry score evaluated with a benchmark (74/100). This is an all-time high and confirms the positive trend we have seen over the last few years.



The full engagement survey also reviews scores and feedback from several questions and more than 1,800 qualitative comments left by employees.

The main strengths identified through both surveys were the following:

- **Flexibility:** 89% of survey respondents said that they are given enough flexibility to meet their work and home life commitments.
- **Authenticity:** 88% of survey respondents said that they feel comfortable being themselves on their teams.
- **Feedback:** 87% of survey respondents confirmed that their managers provide them with feedback that helps them improve their performance.
- **Contribution to Criteo's Success:** 87% of survey respondents declared they understand how their work contributes to Criteo's success.
- **Leadership Team:** 77% of survey respondents said that they have confidence in the Leadership Team.

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

To validate the feedback received internally, Criteo cross-references the results of these surveys with external feedback received through Glassdoor. The two sources are aligned in terms of results, confirming the positive trend that we have seen over the last 3 years.

In 2022, Criteo also carried out a specific **manager survey** where employees were asked to provide feedback on their direct managers. 76% of employees responded to the survey and, as a main outcome, **96% of the respondents confirmed that their managers embody Criteo's values**. The main strengths of Criteo's managers highlighted through the survey are their open and honest communication, the fact that they care about their people and that they encourage innovation. Based on the results, managers can identify improvement areas for their personal and professional

development. Managers get access to a detailed report of the feedback provided by their team and are encouraged to use the survey feedback as input to set their development goals as part of the Performance Review Process.

### *c. Employee Recognition*

In a context where employees are increasingly telecommuting, it's more important than ever to ensure employees are properly recognized on a regular basis for all the great things they achieve. **Spotlight is Criteo's global recognition program**, available for all employees. This platform was launched in 2019 with the objective 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 to recognize everyday great contributions, point-based recognitions to reward great achievements performed during a month, and a quarterly Standing Ovarions exercise to reward outstanding 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 of 99%, the platform, used across regions and teams, is a big success.** More than 68,000 recognitions have been received by Criteo employees in 2022.

Thanks to the platform, the employees donated \$41,240 to organizations such as the non-profit Amnesty International, to support people affected by the war in Ukraine.

## **3. Diversity, Inclusion, and Equal Opportunities**

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

Diversity, Equity, and Inclusion are at the heart of Criteo's values. As a global technology company, Criteo's mission is to sustain our focus on equity, and reinforce diversity through how the Company hires, develops, rewards, and retains talents.

While this commitment is a company-wide one, embodied by all employees, Criteo's dedicated DEI team is responsible for spreading a day-to-day DEI culture, developing a strong DNA within Criteo, and being the link between employees' community groups<sup>40</sup> and the Leadership Team. In 2022, we have created **3 regional program management roles**, covering Americas, EMEA, and APAC, which reinforce our efforts to ensure DEI continues to be a priority throughout all our locations.

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<sup>40</sup> Employee Resource Groups.

2021 saw the formal establishment of the foundation of our DEI strategy with the communication of Criteo's Global DEI Vision and Commitments<sup>41</sup>, the definition of Criteo's DEI Policy, and the calculation of Criteo's **Inclusion Index** (see below) – among other major initiatives.

Those first significant steps were indeed the beginning of a much more ambitious journey, and we focus now on the three following priorities:

- 1) **Fostering DEI culture at Criteo** through trainings, events, partnerships, awards, actions from Employee Resource Groups (also called “Community Groups”), etc.,
- 2) **Improving measurement of DEI at Criteo** through existing and updated DEI performance indicators (see the following sections),
- 3) **Achieving Criteo's key DEI objectives** of maintaining (or increasing) Criteo's Inclusion Index score, maintaining pay parity, increasing women promotions, and increasing the share of women in tech roles, in Board team and Leadership team (see Criteo's priority KPIs and targets summary table in section I.3.).

The main crosscutting elements of Criteo's DEI strategy are focused on the **Inclusion Index**, Criteo's **DEI survey**, **DEI Learning Paths**, **DEI Week**, and a selection of **new DEI programs** that were launched in 2022.

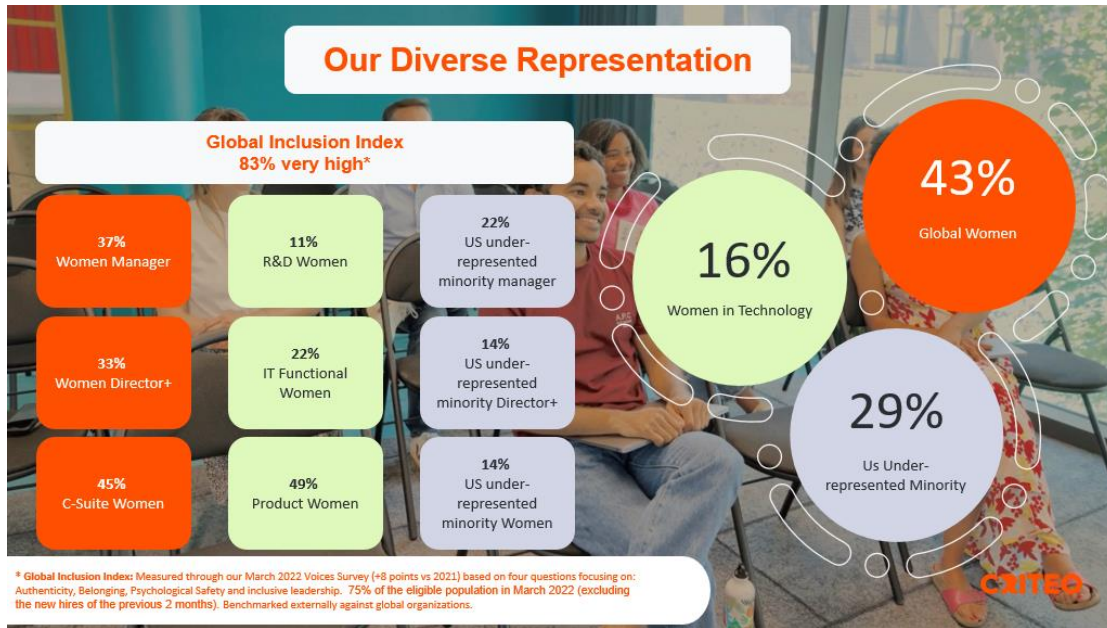
The following sections offer a more detailed vision of Criteo's policies, commitments, and actions toward **Gender Equality**, the **LGBTQIA+ community**, all types of **Families**, **Social diversity**, **People with disabilities**, and **BIPOC communities** – as well as a focus on general **non-discrimination**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

### *Inclusion Index*

In 2021, Criteo established its first **Inclusion Index**, focusing on evaluating our culture of belonging, authenticity, psychological safety, and inclusive leadership. Our Inclusion Score was reassessed in March 2022, revealing an increased score of **very high 83/100** (vs 75/100 in 2021), which reinforces the impact of our DEI strategy and various initiatives described in the 2021 CSR Report. The 2022 survey the Inclusion Index is based on was answered by 75% of eligible employees, excluding those who had joined Criteo less than 2 months before.

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<sup>41</sup> More details on Criteo's website [here](#).



## DEI Survey

A deeper DEI study was conducted for the first time in 2022 with the help of a specialized outsourced provider, which was voluntary and anonymous, with specific self-identification questions to help us further evaluate our workforce and inclusive culture.

The survey supported the cultural findings from our Inclusion Index, but also gave us deeper insights to topics of fair management, career development, workplace flexibility, workplace safety and recruiting and hiring.

## Actions from survey insights:

Career Development	Fair Management	Workplace Safety
Clarity around internal career paths Promotion of internal career vacancies and voyager (short term assignments) Mentoring Program Pilot CoachMe Program	Communication and clarity of Promotion Guidelines Launch of Future Makers Program (Manager Training)	Mandatory eLearnings (Preventing Harassment & Code of Business Conduct & Ethics) Reinforcing internal guidelines to raise a concern or a complaint Mental Health First Aid Accreditation



### *DEI Learning Paths*

DEI Learning Paths were developed in 2021 with specific e-learning training related to Diversity, Equity, and Inclusion. These training courses, available to all employees, aim at strengthening employees' commitment by providing them with a wealth of knowledge on DEI topics. In 2022, the DEI Learning Paths were completed as planned with an additional section related to Criteo's **new Anti-Harassment and Discrimination policy**, regarding which a new mandatory annual training has been rolled out for all employees globally in 2022 (see the end of this section).

### *Investing in new DEI programs*

Key new DEI programs developed in 2022 at Criteo include, among others:

- The **Open Path program**, which aims to create more open opportunities for students from underprivileged and/or non-traditional educational backgrounds (see section V.3.e.),
- The **Pilot Mentoring Program**, launched at the end of 2022 and focusing on Career and Skills Development in two targeted groups with a big focus made on Women in R&D (see section V.3.b.),
- The **Returnship Program Pilot**: launched in February 2022, supports a talent group that has taken an extended career break for parenting or other reasons to return to the workforce. Returners are experienced, and skilled professionals and are predominantly women. The onboarding looks the same as our normal onboarding, with the difference that there is much more support given in terms of training, meetings with the program manager, job shadowing, mentorship, *etc.* This program provides a different avenue to return to the workplace in a supportive and inclusive way.

Awards received by Criteo for its commitment to diversity, equity and inclusion are listed in section I.4. of this report.

## *b. Gender Equality at Criteo*

### *Criteo's gender equality commitments*

Criteo set out clear commitments towards advancing gender parity and is proud to be driving meaningful change for women in Tech with, for instance, our declaration to sustain pay equity globally and our focus on improving career paths in technology for women (see Criteo's priority KPIs and targets summary table in section I.3.).

In 2022, we strengthened those commitments by signing the **LEAD Network CEO Gender Parity pledge** by our CEO (available [here](#)). The LEAD Network's mission is to attract, retain and advance women in the industry in Europe through education, leadership, and business development (more information available on their website [here](#)). This pledge will hold Criteo accountable for substantially advancing career paths for women alongside thirty other LEAD Network partners.

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



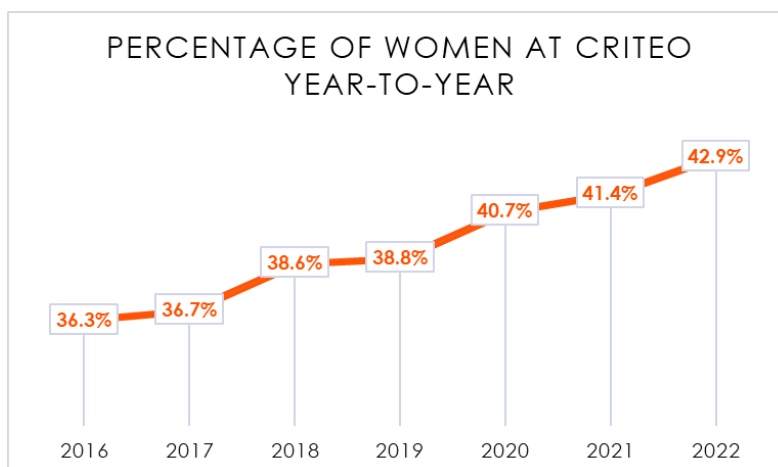
Lastly, Criteo's **gender equality agreement in France** was renewed again in 2021 for three years. This agreement promotes equal pay, diversity during recruitment processes, equal access to training, and equal opportunities for career development and promotions. Several targets<sup>42</sup> were established as part of this agreement, such as prohibiting unjustified pay differentials, increasing the number of promotions granted to women to 37% of the total amount of promotions, and increasing the proportion of women in all the different types of positions and pay ranges by 2% per year to reach 38% total representation of women in France within three years.

#### *Monitoring gender equality at all levels of the company*

Criteo is taking steps towards gender balance and equality with an increase in women employees in 2022 in the general population of employees, as well as manager positions.

Gender equality	Total employees		Managers		Directors and VP <sup>43</sup>	
	2021	2022	2021	2022	2021	2022
Men	1,538 (59%)	1,775 (57%)	340 (67%)	387 (64%)	167 (71%)	173 (68%)
Women	1,085 (41%)	1,335 (43%)	170 (33%)	217 (36%)	67(29%)	83 (32%)
Non-binary	1 (<1%)	3 (<1%)	0 (0%)	1 (<1%)	0 (0%)	0 (0%)
Total	2,624	3113	510	605	234	256

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



<sup>42</sup> The targets mentioned in this paragraph concern Criteo's French entities.

<sup>43</sup> Vice President.

Criteo aims to hire talent without gender discrimination and promote fair opportunity regardless of gender. In 2022, 44% of employees promoted were women, more than the share of women employees in the company (43%).

#### *Key programs and partnerships supporting women in tech roles*

- Launched at the end of 2022, Criteo's **Pilot Mentoring Program** proposes a focus on Career and Skills Development for two targeted groups, women in R&D being one of the main areas of focus. This program allows employees to build a trusting and inspirational relationship with one another, find a space where they can reflect, and finally, successfully develop their career and network.
- **Women Who Code** is a global non-profit that aims to empower women to excel in technology careers.
- **50inTech** is an inclusive platform acting as a business and career accelerator for all women in Tech. In 2022, Criteo obtained a score of 83 on the 50inTech Gender Score assessment, which measures the inclusion level of women at Criteo. Criteo's Head of Product Design (a woman) also hosted a Masterclass on *How to grow your influence as a Creative/Designer* during 50inTech's "Wannabe a CPO" Bootcamp.
- **Ada Tech School** is an inclusive and feminist computing school, accessible for all to learn how to create with coding in an open, caring environment. As part of this partnership, Criteo commits to hiring at least one apprentice per year, and taking part in activities organized by the school such as job fairs and mock-up interviews. Since the partnership's launch in January 2022, Criteo hired three apprentices in August 2022 and joined the Open Path program (see below).
- In Spain, Criteo partnered with **Girl in Tech Spain (GIT)**, a non-profit organization focusing on erasing the gender gap in Tech. In 2022, Criteo participated in GIT Spain Hackathon for Humanity and Women's Day Roundtable.

#### *Events promoting gender equality*

- **Top Women Tech – Careers International:** in May 2022, Criteo participated for the first time in the Top Women Tech Summit by Careers International in Brussels. During this event, eighteen companies met with 120 high profiles tech talent open to career opportunities.
- **WomenTech Global Conference:** Criteo's *SVP Talent Development and DEI*, Rachel Scheel, hosted a talk at the WomenTech Global Conference where she explored how we can support women in the workplace to feel a greater sense of belonging, helping them to be their best selves at work.

## Employee engagement for gender equality

### The Women@Criteo Community:

With **over 550+ members and over 150 attendees at each event**, Women@Criteo is an inclusive internal network that aims to **transform and promote gender equality within the company**. Its mission is to be a catalyst for the advancement of women in the workplace at Criteo and in our industry to promote equal access to all opportunities across our organization.

In 2022, the community organized events and workshops with internal and external experts. For instance, we held three sessions with the company [YourJuno](#) to provide financial education to the community members, and hosted an event to introduce the non-profit [Refugee Women's Centre](#), which provides holistic support for migrant women and families living in informal outdoor settlements. For International Women's Day, the Women@Criteo community invited two young activists to share their daily lives as women committed to the environmental cause.

### *Women in R&D Network*

To increase the retention of women in the R&D team (with currently 11% of women), we launched, in 2022, the **Women-in-R&D Network** with the aim to:

- multiply initiatives to attract more women into Criteo R&D roles,
- ensure that the women in our R&D functions feel connected and supported in their growth and engagement at Criteo,
- provide channels to listen to Women in tech roles feedback and activate a positive experience for all women at Criteo.

In this context and as a first step, the DEI team ran several regional focus groups in EMEA and Americas for Women in R&D functions to get more insights into the needs and expectations of this population internally. The next step will be to develop alongside the People Business Partners a DEI roadmap for the upcoming years with several actions to support Women in R&D roles and educate the middle and higher management level on the principles of DEI.

### *c. Inclusion of the LGBTQIA+ Community*

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

**MyGwork** is a business community for LGBTQIA+ professionals, students, and inclusive employers. Criteo's partnership with MyGwork creates more opportunities to network, mentor, and build relationships inside and outside of Criteo in support of the LGBTQIA+ community. In 2022, Criteo participated in numerous events, including MyGwork WorkFair (the largest global virtual career fair for the LGBTQIA+ community) and WorkPride, a global five-days virtual Pride conference.

Criteo 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 creating an inclusive environment for LGBTQIA+ employees, ensuring equal rights and treatment for all employees regardless of their sexual orientation or gender identity. For awards and recognitions related to LGBTQIA+ inclusion, see section I.4.

As part of the partnership with 50inTech (see above), Criteo hosted an **event on “How to successfully attract and retain LGBTQIA+ talent”** during the Tech Changer Club session.

The project called **“That’s My Name”** 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.

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

#### *The Pride Community*

With **over 280+ members**, Criteo’s **Pride Community** promotes initiatives to develop an open and inclusive **work environment** where Criteo employees can be themselves and feel supported. In 2022, the Pride Community provided **awareness** on LGBTQIA+ Inclusion topics throughout the year. The main milestones dates were the following:

- The **International Transgender Day of Visibility** on March 31<sup>st</sup>: the community has compiled different resources for all employees internally to learn more about this day and its meaning (a quiz to test their knowledge, a donation to non-profits supporting LGBTQIA+ people, and relevant external educational content and challenges on Criteo’s volunteering platform).
- To celebrate **Pride Month** in June, the community developed different activities, such as educational webinars, events, donations and challenges on the volunteering platform.
- On National Coming Out Day on October 11th, our Pride Community shared their experiences about Coming Out in their personal and professional life and invited all who wished to do the same. They created a **“Coming Out Day” Video** with the testimonials.
- The community also held a **cross-over event with the Parents Community** on the following topic **“Have you talked to your kids about LGBTQIA+ topics?”** during Parents Day on October 27<sup>th</sup>.
- **LGBTQIA+ Inclusion focus groups** were run in 2022 in APAC, EMEA & Americas to get more insights into the needs and expectations of this population internally.

#### *d. Parenthood Support at Criteo*

Since 2021 and the launch of Criteo’s extended **secondary care parental leave**<sup>44</sup>, much has been done to support parents amongst our employees, as demonstrated by Criteo’s obtention of the **Family Friendly Company Label** (see section I.4.).

In other notable changes, Criteo’s career website now includes a **Your Kind of Family** page explaining Criteo’s vision and actions for a family-friendly company (available [here](#)).

Another example of parenthood support at Criteo is the **CARROT program** launched globally to all Criteo countries in 2022. This program is an employer-sponsored inclusive fund to pay for fertility treatments and family-forming services. It covers fertility education and assessments, fertility

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<sup>44</sup> Offered for four weeks across all locations globally, regardless of their gender or marital situations.

preservation, in vitro fertilization (IVF), donor-assisted reproduction, including gestational carrier services (where legally allowed), and adoption (more information available [here](#)). Now, most employees are eligible regardless of their gender, sexual orientation, single or couple status, *etc.* In addition to the global expansion, Criteo has increased its financial commitment to cover up to the country equivalent of \$50k USD based on each country's cost of care as determined by CARROT for treatments and services per employee.

Criteo also partners with **Fertility Matters at Work**, an organization that educates and inspires businesses with an awareness of how fertility issues affect both their employees and their organization (more information available [here](#)). This year Criteo hosted an event with Fertility Matters at Work for the **global** launch of the company's fertility and family-forming benefits with its partner CARROT. The organization also supports Criteo and provides guidance on how the company can improve to being a fertility-friendly employer of choice.

#### *The Parents Community:*

Created in 2021, the Parents Community now gathers 350 members and aims to support parents throughout their parenting journey, from the moment they discover their future parenthood to their return to work and beyond. Some key actions taken by the Parents Community in 2022 include:

- A **roundtable** with Criteo parents to celebrate International Family Day and raise awareness on the different types of families and their challenges, from "traditional" families to same-sex couples, foster parents, older parents, and more,
- A **cross-community event with Criteo's Pride Community** focusing on what we can do as parents to help our kids be open-minded and inclusive of others,
- Online **Pediatric First Aid** courses organized together with Criteo's Health & Safety team to help parents and anyone who is often in contact with kids to feel more confident and prepared if anything happens to the little ones.

#### *e. Social Diversity*

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

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

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

Other initiatives and partnerships pursued in 2022 include:

- **“Article 1” and “Simplon”** are now historical partners of Criteo to foster social diversity in the workplace (more information available [here](#) and [here](#)). More than **15 volunteers in France** committed to actions with those two organizations in 2022. 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.
- **Sistech** is a new partnership launched by Criteo in 2022 to empower uprooted and displaced women through qualified / sustainable tech / digital jobs of their choice (more information available [here](#)).
- **Rêv’Elles** is a French non-profit that inspires, motivates, and supports young women from underrepresented neighborhoods in their personal and professional development. Criteo actively participates in “Rêv’Elles Ton Potentiel” and “RVL Tech” programs (more information available [here](#)).
- **Boyd Initiative:** Is a U.S based organization that helps Black undergraduate and recent college graduate students pursue full-time positions in the Advertising & Tech Industry. Through our partnership with the Boyd Initiative we have successfully hired a total of 9 cohorts from this program that have joined Criteo across Sales, Customer Success and Marketing (more information available [here](#)).

**The Education Community:**

Created in 2020 and **counting now more than 260 members**, the **Education Community’s** goal is to support, guide, and encourage under-represented people in the employment market. Some key actions taken by the Education Community in 2022 are presented below:

- In October we ran our **first Education Week** to raise awareness and support educational topics with keynotes, workshops, in-person events with partners (MigraCode and The Boyd Initiative) and volunteering activities.
- Participated in **DuoDay** in partnership with the Criterable Community (November).
- **Expanded our network** of local ambassadors to AMERICAS and APAC.

*f. People With Disabilities*

Criteo’s **Global Disability Policy** demonstrates the company’s commitment to fostering and supporting a diverse workforce and to integrating equal opportunities for people with disabilities into Criteo policies, procedures, decisions, and operations. Criteo is committed to ensuring equal access and participation for people with all types of disabilities (either physical or mental, and visible or hidden). We are committed to treating people with disabilities in a way that allows them to maintain dignity, respect, and independence.

In 2022, our teams worked on **initiatives to better include people with disabilities in the workforce**. During **Criteo’s Global DEI Week** in June 2022, the DEI team organized two **awareness sessions** on *Disability Access and Learning to see beyond what meets the eye*, hosted by a TEDx speaker.

A training called “Hiring people with disabilities” is available since 2020 to smooth the recruitment process for candidates with disabilities, and our **toolkit for managers** specifically addressing inclusion for employees with disabilities, available on the Portal People, aims to better welcome and support employees.

Three employees have been trained at the end of 2022 to become **disability referents in France**. The referents will exercise this role voluntarily simultaneously as their actual contract job and responsibilities. These 3 profiles will be part of the “Criterable Community” (see below) for France. Their missions for 2023 will be to:

- Organize the **consideration of disability** throughout the recruitment process and integration,
- **Inform, guide, and support employees with disabilities**,
- **Develop and monitor external partnerships** (Agefiph<sup>45</sup>, Cap Emploi, etc.),
- Organize **information and awareness-raising actions internally**,
- Ensure a **dedicated** monitoring of legal requirements and good practices (news, legal benchmark, Network of Disability Referents ...),
- Build and manage an **action plan/disability policy** (with concrete and measurable objectives, indicators, and budget) which can be formalized in the framework of an agreement with Agefiph or a collective agreement,
- **Communicate internally** on the disability action plan, results, and experiences..., notably during meetings with the CSE/CSSCT and externally.

#### The Criterable Community:

With above **170+ members**, the Criterable Community commits to improving the employees who have disabilities' experience at Criteo, and to act so that they can demonstrate the full capacity of their creativity, innovation, performance, success. Some key actions taken by the Criterable Community in 2022 are presented below:

- At its own **instant communication channel (slack)**, Criterable Community set up recently the *Wednesday Rendez-Vous* as a way of interaction/communication/awareness on disability topics.
- **Criterable Weeks** (5-16 December 2022): During these two weeks, to raise awareness about disability around 22 themes and with a focus on mental health, the community organized several impactful online sessions that includes sessions with D&A (Diversity and Ability) as well as a couple of challenges via GIVING by Alaya.
- **Criterable Day**: celebrated in May 2022 with the objective to support stronger awareness and focus on the everyday actions Criteo can take to be more open and inclusive towards anyone living with a disability. In this context, the Criterable community organized **awareness sessions** with experts and speakers.
- **Criteo University**: during our global company event in June 2022, the Criterable Community took part in a **Criteo University session** to present the community, to emphasize the less visible/invisible disabilities, and invite employees to join the community group.

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<sup>45</sup> "L'Association de gestion du fonds pour l'insertion des personnes handicapées" is the french organism that manages the fund for the integration of disabled people.



### *g. Inclusion for the BIPOC Community*

In 2022, Criteo pursued its commitments to support Black, Indigenous, People of Colors (BIPOC) people. One of the key actions was to develop a 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:

- **Antiracist Training:** This session was designed to build an understanding and share the stark realities of the impact of racism and the trauma associated. This one-hour session provided insights on where racism originated and how it still impacts individuals globally.
- **Partnership with the Boyd Initiative,** a US organization helping Black professionals to discover careers in Advertising and Media. In 2022 Criteo successfully hired nine alumni members through our partnership with Boyd that span across Sales, Customer Success and Marketing.
- **Juneteenth Learning Hour:** This year Criteo took an educational stance to drive global awareness about the importance of this historic holiday. Partnering with a keynote speaker we hosted a virtual Juneteenth Learning hour accessible to all Criteo globally to learn about the history of Juneteenth.
- Criteo will continue to **raise awareness internally** to support its BIPOC Community and reinforce the power of allyship to strengthen its culture of inclusion. In 2022, a DEI Program Manager for the Americas have joined the DEI team to specifically support the United States focusing on increasing opportunities to attract, retain and develop underrepresented minorities.

#### *The BIPOC Community:*

With **about 200+ employees**, the BIPOC Community's mission is to create a culture that empowers employees of color by creating safe spaces, providing resources for career development, and offering educational opportunities to the Criteo community. The BIPOC Community at Criteo was inspired by the BIPOC Project. Some key actions taken by the BIPOC Community in 2022 are presented below:

- **BIPOC Sponsored Community Building-Wakanda Forever:** For the release of the movie "Wakanda Forever", celebrating Black representation in media; our BIPOC Community held a private viewing to drive community building and togetherness.
- In October 2022, our BIPOC Community celebrated **Hispanic Heritage Month and Black Movement**, similar to the annual Black History Month celebrations in February in the United States.
- A Criteo University session took place in October 2022 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.

#### *h. Non-discrimination and Prevention of Harassment*

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

Alongside, Criteo developed a new global eLearning with country specific modules related to **Preventing Harassment and Discrimination in the Workplace**, which was also launched at the same time, and required compulsory completion. This eLearning will require an annual recommitment from all employees. The global completion rate on December 31, 2022 reached **81%** (2,695 employees having followed the training out of a total of 3,335 employees).

In addition, Criteo applies its **equal opportunity approach**<sup>46</sup> which strictly forbids all forms of discrimination, whether at the recruitment stage or afterward regarding promotions, salary increases, and benefits, and specifies that no employee may be discriminated against based on gender, race, ethnicity, religious belief, disability, national origin, veteran status, marital status, or sexual orientation.

Today **92** 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 based on age, be it through external hires or internal promotions.

Hires and promotions of employees above 40 years old	2021	2022
- Share of employees over 40 years old in hires	10%	10%
- Share of employees over 40 years old in promotions	9%	10%

Criteo also recognizes the importance of freedom of speech for employees, and no discrimination is directed at employee representatives. Criteo's Code of Business Conduct & Ethics (see section VII.1.) 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, and
- 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](#).

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<sup>46</sup> Our DEI Policy is available [here](#).

# Governance

## VI. Sustainable Relationship with Stakeholders

### 1. Dialogue with Stakeholders

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

- Employees (see sections III., IV. and V.),
- 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.),
- Non-governmental organizations (NGOs) (see section V.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.

In 2021, we also extended our consultation with external stakeholders as part of the update of our materiality analysis presented in introduction to this 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 achievement of clients' business objectives**. With dedicated Sales and Account Strategy, Creative Services, Analytics, and Technical Services teams, Criteo's clients receive seamless, high-quality support and actionable insight, which are key factors in Criteo's ability to maintain close to 90% client retention every quarter<sup>47</sup> since 2011.

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 Sell-Side Platforms (SSP) 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.

To continue improving the quality of its services and to create a trustworthy relationship with clients, Criteo conducts **an annual client satisfaction survey (CSAT Survey)**. Close to 900 client contacts

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<sup>47</sup> Quarterly retention rate represents the percentage of live clients during the previous quarter that continued to be live clients during the current quarter.

responded this year, representing 660+ 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 2022, this close-the-loop system resulted in over \$33 million in protected revenue from detractor accounts that were deemed at risk.

As a testament to Criteo's commitment to client-centricity, a fully-fledged team was created in November 2022. This team is tasked with collecting clients' signals and empowering the organization to drive measurable change based on them. This renewed focus will allow Criteo to deepen the dialogue with its clients by surveying them twice per year.

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 2022, we participated in 22 investor conferences and non-deal roadshows. We also hosted an in-person investor day in October 2022, offering current and potential shareholders and sell-side analysts an opportunity to learn more about the progress that Criteo has made on its transformation, its go-forward strategy, business ambitions, and ESG <sup>48</sup> approach to drive long-term sustainable value.

We have a comprehensive Investor Relations [website](#) that 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 DEI 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 I.3. of this Report) to identify and prioritize the issues that matter most to our business. We also conducted an investor perception study in 2022 and collected feedback from the investment community on Criteo's ESG strategy.

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. In 2021, **we adopted the Sustainability Accounting Standards Board (SASB) reporting framework**<sup>49</sup>. 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 CDP<sup>50</sup> Climate Change questionnaire and adopt the Task Force on Climate-related Financial Disclosures (TCFD) framework.

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

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<sup>48</sup> Environmental, Social, Governance.

<sup>49</sup> See our SASB concordance table in the Appendix.

<sup>50</sup> 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, that has been constantly updated since then**, 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:

Regarding environmental criteria *“Criteo 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 Request for Proposal (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, responsible procurement, and certification.

Criteo signed a partnership with EcoVadis in 2022 and worked on defining the basis of its sustainable Procurement approach. An action plan with a roadmap and priorities has been defined for 2023.

## VII. Operating Responsibility

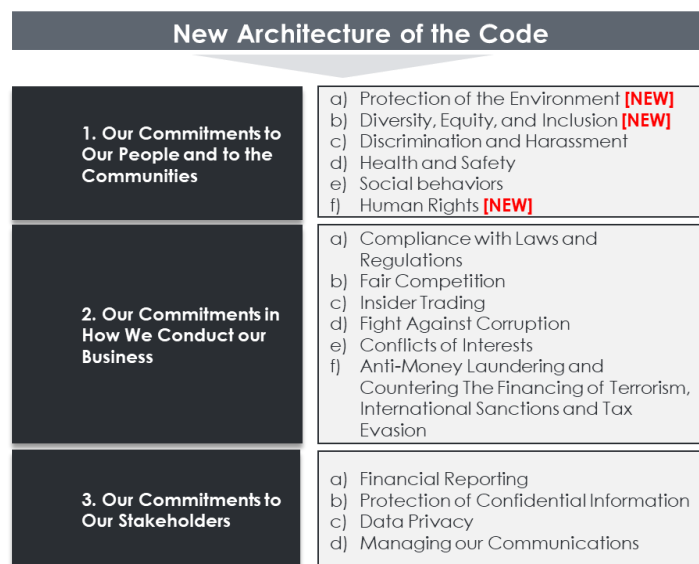
Criteo is committed to carrying out its business in compliance with local and international regulations in all the countries it operates and according to high ethical principles. Ethics and compliance are the cornerstones of sustainable value creation, and Criteo's activities are part of this responsible, long-term vision.

This engagement is reflected in our **Code of Business Conduct & Ethics**, where ethics and compliance are at the heart of our actions, as a fundamental guarantee of trust and high standards for all our employees, communities, clients and stakeholders.

### 1. Code of Business Conduct & Ethics

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

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



The Code of Business Conduct & Ethics is a guide to its actions and decisions so that Criteo conducts its business with fairness, integrity and respect for the law and our Values.

In 2022, the completion rates for the Code of Business Conduct and Ethics, and Anti-Harassment training pieces were **97%** and **81%** respectively. We aim to maintain these scores at, at least, 80% each year.

## 2. Corporate Governance

Our corporate governance framework enables our Board of Directors and management to pursue our goals and strategic objectives in seeking to maximize long-term shareholder value. The Board of Directors is strongly committed to good corporate governance and seeks opportunities for improvement on an ongoing basis. Annually, the Board of Directors considers updates to our corporate governance framework based on shareholder feedback, results from the annual general shareholders meeting, the Board of Directors and committees' self-assessments, governance best practices, and regulatory developments.

For more information on corporate governance practices, please refer to our 2023 Proxy Statement.

## 3. Board Diversity

Board Diversity Matrix (As of April 2022)				
Total Number of Directors 7	Women	Men	Non-Binary	Did Not Disclose Gender
Part I: Gender Identity				
Directors	3	3		1
Part II: Demographic Background				
African American or Black				
Alaskan Native or Native American				
Asian				
Hispanic or Latinx				
Native Hawaiian or Pacific Islander				
White	3	2		
Two or more Races or Ethnicities				
LGBTQ+	1			
Did Not Disclose Demographic Background	1			

Directors who identify as Armenian: 1

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

## 4. Risk Oversight

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



While our Board of Directors oversees our risk management, our management is responsible for day-to-day risk management processes. Our Board of Directors expects our management to consider risk and risk management in each business decision, to proactively develop and monitor risk management strategies and processes for day-to-day activities and to effectively implement risk management strategies adopted by the Board of Directors. We believe this division of responsibilities is the most effective approach for addressing the risks we face.

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

## 5. Ethics in Our Ads

We are aware at Criteo that being a responsible company also means offering responsible services. We intend to anticipate and address rising expectations regarding 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. Based on its impulsion, the leadership team has decided to create a **Product Ethics Committee (PEC)** in 2021. The committee is chaired by Criteo's Chief Legal and Corporate Affairs Officer, 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 maintain a sense of pride in Criteo about our company's approach. The Committee anticipates and proactively seeks to respond to any ethical concerns before they are raised by our stakeholders or materialized. The PEC steers internal standards regarding Criteo's products, while also acting as a multi-stakeholder and cross-continental forum to discuss and act upon regulatory and industry developments. In 2022, the committee worked on:

- The modification of the **Criteo Advertising Guidelines** (available [here](#)) to cover the emerging risk associated with evil uses of the audience features of the platform. We re-affirmed at that occasion that Criteo prohibits any use of its platform's features, that would introduce a targeting bias towards groups or populations and resulting in an inappropriate prejudice in favor of or against those groups/populations,
- The modification of the **process of initiation of new technical projects** in the R&D to include a check related to possible ethical issues that would result for this project development and asking to contact the PEC in case of issue or doubt,
- Presentations to employees on the **notion of ethical advertising**, its importance for Criteo and the role of the PEC.

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

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

On the demand side, the **Advertising Guidelines**, mentioned above, also constitute a cornerstone of the ethical approach by defining what our clients can't do using our platform: restriction on products, restriction on targeting, *etc.* In addition to the ethical aspects, we supplement our guidelines with elements such as regulations, industry standards, *etc.*

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

In June 2022, Criteo signed **IBM's Advertising Fairness Pledge**. The initiative aims to bring together agencies, brands, and other leaders to generate awareness and improve fairness in marketing campaigns. Through this signature Criteo is committed to "get the facts on bias in advertising technology, explore the impact of bias on advertising campaigns and practices and be an advocate for Advertising Fairness" (more details are available [here](#)).

## 6. Data Privacy and Information Security

Criteo takes privacy protection and compliance very seriously. Processes and policies are put in place to protect and process data **in compliance with applicable Privacy and Data Protection Laws**. This includes the European GDPR (General Data Protection Regulation) that came into effect in May of 2018. The legal team actively monitors the evolution of regulations in order to anticipate and prepare for future changes.

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

Emphasizing the continued importance we place on data privacy, **a privacy policy that covers all Criteo's products is 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.

A new version of Criteo's **Privacy Policy** has been published at the end of 2022, to clarify some aspects of the Policy and to improve transparency towards users. The new Policy is available on Criteo's website [here](#).

Guidelines specifically 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 (available [here](#)).

Criteo's **Privacy Guidelines for Clients and Publishers Partners** that was created in 2021, has been updated this year following major regulatory changes, to make sure our partners have the right understanding of the data collection practices at Criteo. These guidelines are available on Criteo's website [here](#).

### *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:

- 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, Criteo hired a **Data Privacy Officer** long before the GDPR regulations became effective (2013).
- These experts sit within the Product and R&D team. They perform ongoing Privacy Impact Assessments to monitor potential risks during the product lifecycle and proactively mitigate those risks.
- The Data Privacy team delivers company-wide **privacy training**, enforces the Code of Business Conduct & Ethics, 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<sup>51</sup> Criteo already maintains strict security measures when collecting consumer data from our clients. We utilize modern pseudonymous methods, such as MD5 and SHA-256 double-hashing processes, which can be considered best practices under the GDPR and among the best standards in the industry. Also, we willingly never store any directly identifying personal information about individual consumers.

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 2022.**

In the context of the COVID-19 pandemic, Criteo observed an increase of phishing attempts. We reinforced security measures related to emails by implementing DMARC<sup>52</sup> authentication protocol. Our phishing simulation campaign is mandating specific training for employees. Training content we enriched to develop employees' awareness of this specific risk.

A public page has been made available on our [corporate website](#) to inform clients and partners of the threats we have identified.

## *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<sup>53</sup>, the FEDMA<sup>54</sup> Code of Conduct, the IAB<sup>55</sup> Transparency and Consent Framework, the IAB CCPA<sup>56</sup> framework, the NAI<sup>57</sup> Code of Conduct, or the Digital Advertising Alliance CCPA<sup>58</sup> 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

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<sup>51</sup> General Data Protection Regulation.

<sup>52</sup> Domain-based Message Authentication, Reporting & Conformance.

<sup>53</sup> European Interactive Digital Advertising Alliance.

<sup>54</sup> Federation of European Data and Marketing.

<sup>55</sup> Interactive Advertising Bureau.

<sup>56</sup> California Consumer Privacy Act.

<sup>57</sup> Network Advertising Initiative.

<sup>58</sup> California Consumer Privacy Act.

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 maintains 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 issues in the way their data is managed. Criteo has an obligation to respond to such requests within 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<sup>59</sup> 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 clients 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*

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

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

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

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<sup>59</sup> General Data Protection Regulation.

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

## 7. Global Tax Compliance

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

However, 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<sup>60</sup> guidelines. Criteo is only located in countries where there are commercial activities, and adopts a proactive approach to identifying, evaluating, and monitoring tax risks and managing all identified risks.

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

## 8. Anti-corruption

Criteo is deeply engaged in fighting corruption and in the respect of its values. Thus, controlling the risk of non-compliance is a major issue for the protection of Criteo's image and values.

Criteo has zero tolerance for bribery and corruption. Criteo prohibits corruption and 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, French Loi Sapin II, as well as the applicable anti-corruption laws of all the countries in which it operates.

To control the corruption risk, Criteo implemented several policies, including:

- **Criteo's Code of Business Conduct & Ethics** is Criteo's reference document which sets out the policies and procedures that reflect Criteo's commitment to maintaining the highest standards of honesty, integrity and ethics when conducting Criteo's business. More information is available in section VII.1. of this report.
- **Criteo's Third Party Code of Conduct** (created in July 2022) provides guidance to Criteo's Third Parties on how to consider ethics and compliance in their work with Criteo. This document is a framework to help them to better understand what Criteo expects while conducting business.
- **Criteo's Global Anti-Corruption Policy** (updated in February 2022) provides further details on our anti-corruption efforts, including definitions and examples of situations that present

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<sup>60</sup> Organisation for Economic Co-operation and Development.

corruption risk, and the responsibilities of employees and managers to comply with the policy and ensure their subordinates do so as well. This policy also summarizes the anti-corruption laws and regulations in the various countries where Criteo conducts business.

- **Criteo's Gifts, Hospitality & Entertainment Policy** (updated in July 2022) defines the rules to apply for the offering or the acceptance of gifts, entertainment and hospitalities. It provides a single and unique reference and guide on its related matters. It also strictly prohibits Criteo's employees (or any third party acting on our behalf) from offering or accepting anything of value (including but not limited to gifts, meals/entertainment, money or services), directly or indirectly to/from a foreign government official, a political party, political party official, a candidate for political office, or private/commercial third party, for the purpose of influencing official acts, obtaining or retaining business or to secure an improper advantage.
- **Criteo's Conflicts of Interest & Related Person Transaction** (updated in July 2022) provides detailed information on how to identify, avoid and address potential or actual conflicts of interest, how to disclose potential or actual conflicts of interest, and the process to follow.
- **Criteo's Whistleblowing Procedure** (updated in July 2022) provides guidance on the reporting and handling of concerns regarding any violation of laws and regulations, or any misconduct or unethical behavior. It applies to all employees of Criteo as well as other third parties working with Criteo specifically selected.

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

To ensure awareness of anti-corruption matters, all employees are required to regularly complete online the Code of Business Conduct & Ethics training to prevent and deal with any risk situation that may arise within the context of their work and a specific section is devoted to the fight against corruption. In H2 2022, our employees from all countries where Criteo operates have been enrolled to follow an updated version of the said online training. The completion rate is **97%**.

A dedicated training course covering several topics, including anti-corruption, with a focus on interaction with public officials has been delivered (Q2 2022) to employees exposed to risks of corruption according to their activities within the company.

A specific live training course (Q3 2022) has also been performed on the new Whistleblowing procedure to the attention of People Business Partners to ensure complete comprehension of the mechanisms as they might be the first in line to receive alerts from employees.

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 **corruption and influence peddling risk mapping** according to a dedicated methodology validated by the CEO, CCO, CFO and VP, Associate General Counsel and Corporate Secretary, during which Criteo reviews its corruption risks and identify controls to address any gaps that are noted during the assessment.

The Ethics and Compliance Program is implemented by the **Compliance Team** which regularly reports from its activities to the **Governance, Risk & Compliance Committee**, and to the **Board of Directors**, which oversees, via its **Audit Committee**, the deployment thereof on a quarterly basis and provides independent reviews due to its composition of non-executive directors.



## 9. Whistleblowing and alert mechanisms

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

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

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

These channels are only accessible to delivered to the **Chairperson of Criteo's Audit Committee** who is an independent director and is neither an employee nor a manager of Criteo, the **Chief Legal and Corporate Affairs Officer, who is also the Chief Compliance Officer**, and finally, the **Vice President Associate General Counsel and Corporate Secretary** and finally the **Compliance Manager**.

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

**All reports are kept confidential** as permitted under applicable law.

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

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

All employees in all countries received extensive information regarding the implementation of the whistleblowing system.

## Appendix

### 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 (%)	II.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	II.1-2.
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 <a href="#">this page</a> .
	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 (%)	Criteo does not publicly report this information as it is confidential.
	TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Discussion and Analysis	N/A	None of our core products and services are subject to government required monitoring, blocking, content filtering, or censoring.

Data Security	TC-SI-230a.1	(1) Number of data breaches (2) Percentage involving personally identifiable information (PII) (3) Number of users affected	Quantitative	(1) Number (2) Percentage (%) (3) Number	In 2022, 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 in which he/she is employed.
	TC-SI-330a.2	Employee engagement as a percentage	Quantitative	Percentage (%)	V.2.b.
	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for; (1) management (2) technical staff (3) all other employees	Quantitative	Percentage (%)	vV.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 Technology Disruptions	TC-SI-550a.1	(1) Number of performance issues (2) Number of service disruptions (3) Total clients downtime	Quantitative	(1), (2): Number (3): Days	Criteo chooses not to disclose this information due to its sensitive and proprietary nature.
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	N/A	Please refer to our latest 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, 2022, to December 31, 2022.

We aim to match the CSR 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 or the ones located in coworking spaces, Criteo made the decision to include only the largest leased offices during the collection of quantitative data.

Therefore, to ensure reliable quantitative data and boost continuous improvement, the Criteo CSR reporting scope for 2022 considers the major global legal entities with more than 50 employees at the end of 2022. For electricity consumption, only leased 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. This is notably the case of all IPONWEB entities acquired in August 2022: they will be integrated to the CSR reporting scope for the financial year 2023.

Thus, for the financial year 2022, 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 2022, the legal entity Criteo Technology was created, absorbing most of Criteo S.A. employees, this latter entity being thus no longer in the CSR reporting scope.

EMEA		AMERICAS		APAC	
Legal entity	Offices	Legal entity	Offices	Legal entity	Offices
Criteo Technology SAS	Paris Bordeaux Echirolles	Criteo do Brazil LTDA	São Paulo	Criteo KK	Tokyo Osaka
Criteo France SAS	Paris Bordeaux Echirolles	Criteo Corp.	Ann Arbor Boston Chicago* Los Angeles* Miami New York Palo Alto* Portland* Seattle* San Francisco*	Criteo Singapore Pte. Ltd.	Singapore
Criteo Europa MM SL	Barcelona			Criteo India Pvt Ltd.	Gurgaon Mumbai*
Criteo Ltd	London			Criteo Korea Ltd.	Seoul
Criteo GmbH	Munich Dusseldorf*				

Legend: In **bold**, leased offices with more than 50 employees collect actual data for electricity consumption. For other offices, electricity consumption and CO<sub>2</sub> emissions due to electricity consumption are estimated based on a yearly ratio per person based on attendance (while it was based on the location registered in employees' contracts in previous years, which no longer reflects the actual presence of employees in offices with the enforcement of our Flexible Work policy). Those locations correspond to offices with less than 50 employees and/or coworking spaces, and locations where there are no physical working spaces but where employees are formally attached through their work contract (the latter being marked with an asterisk \*). Those locations where the electricity consumption is estimated account for 9% of office electricity consumption.

## 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, interns),
- Employees who are momentarily on leave of absence and are therefore inactive (parental leave, sabbatical leave, long illness, maternity leave, etc.),
- Employees of a legal entity seconded to another legal entity and expatriates,
- Employees leaving the company on the last day of the year.

- **Training:**

Training hours from all employees are taken into account, including employees who left the company during the reporting period. Training hours for 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),
- Anti-harassment and Code of Business Conduct and Ethics pieces of training.

Where face-to-face training hours are related to sessions running over two consecutive years, if the

session represents more than 50 hours, the hours are accounted for pro-rata temporis, otherwise, hours are included within year N figures.

### *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:
  - Micro-learning: recorded from one minute on (LinkedIn Learning; The Learning Zone; The Learning Quest; O'Reilly; DataCamp; TLZone). As the micro-learning platforms are composed of short contents focusing on the essential, a limit of one-min has been set up.
  - MOOC learning: recorded from one hour to max 25 hours (Coursera). As the MOOC courses should take between 19 and 25 hours, a limit of 25 hours for this type of e-learning has been set to make sure that this range includes mostly learning hours contents. Above 25 hours will include most of the time quizzes, exams or discussion forums.
- The reporting of only theoretical hours, not the actual "on-line connection time", for instance for E-learning training from Product team
- Language training courses do not have a minimum duration as we considered that language learning should be measured from the start, 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).
- **CO<sub>2</sub> emissions from electricity consumption of offices:** Emission coefficients per country from ADEME 2022 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 2022 database have been used for the calculation, except for Hong Kong where a rate of  $0.51 \times 10^{-3}$  tCO<sub>2eq</sub> 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

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

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

This report uses certain terms including “material” and “materiality” to reflect the issues or priorities of Criteo and its stakeholders. Used in this context, however, these terms are distinct from, and should not be confused with, the terms “material” and “materiality” as defined by or construed in accordance with 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 [here](#).

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 and potential effect of inflation and rising interest rates in the U.S., 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; the

invasion of Ukraine by Russia and the effect of resulting sanctions on our business; our ability to enter new marketing channels and new geographies; our ability to effectively scale our technology platform; our ability to attract and retain qualified employees and key personnel; our ability to maintain, protect and enhance our brand and intellectual property; failures in our systems or infrastructure; and the risk factors in the “Risk Factors” section of our most recent Annual Report on Form 10-K and those set forth from time-to-time in other filings by the company with the SEC, available through our website or through the SEC’s Electronic Data Gathering and Analysis Retrieval (EDGAR) system [here](#).

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

1° Understanding the context:

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

2° Statement compliance review:

- Making sure that all information concerning social and environmental issues that needs to be included is effectively included,
- Verifying that 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.