

Corporate Social Responsibility

criteoL.



Message from the CEO

“ In our mission to power the world’s marketers with trusted and impactful advertising, we are also committed to leverage our company’s assets in favor of our society and planet.

Our **Corporate Social Responsibility** report is a living proof of Criteo’s culture. Our people advocate diversity and find purpose in giving back, as they are aware of their surrounding society and the environment.

The positive numbers reflected in this report are an achievement of our strongest stakeholder - **our employees**. I am very proud of them and we will continue to empower each and every one to drive the change we all want to see in our world.

I am looking forward to another year full of employee-led grass-root initiatives and aligning our business even more to our social and environmental responsibilities. I feel more than confident that we will be able to do so. This is the foundation which is also part of our company values: together and by keeping an open mindset, we can have the positive impact that we all want to have.”

Megan Clarcken
CEO, Criteo



Business model

We are a global technology company building the leading advertising platform for the open Internet. We strive to power the world's marketers with trusted and impactful advertising.

To do this, we activate our data assets through proprietary artificial intelligence (AI) technology to engage consumers in real-time through the pricing and delivery of highly relevant digital advertisements (ads), across devices and environments. By offering a range of pricing models and measuring our value based on clear, well-defined performance metrics, we make the return on investment transparent and easy to measure for advertisers.

Finance (in million \$)

1,790 in total assets
947 in revenue ex-TAC

Sales

1.4 trillion ads served
\$900 billion annual eCommerce sales

Client Satisfaction

20,200 advertisers and **4,500** publishers connected to Direct Bidder in Web and Apps
Client retention rate close to **90%** since 2011

Data processing and data treatment

21 billion product interactions per month
41k servers, **1225 petabytes** of storage capacity and **1225 terabytes** of random access memory

Environment

Data centers: 84% of electricity consumption from renewable sources
Offices and business travel: 3.6 tCO2 emissions per employee (-13% compared to 2018)

Talent

2,793 employees in 29 offices
39% of women in headcount
Over **43,000** training hours delivered to employees
80% of employees trained in-class and **93%** trained online
Employee Engagement Score: **70** (72 in 2018)

Business model

Our ID graph has more than **2 billion cross-device IDs** across the open internet, those outside walled gardens, which allows us to offer a suite of products that benefit consumers, advertisers, and publishers alike. For advertisers, we offer full-funnel marketing solutions from awareness to conversion and across web, app and store. We also offer a robust Retail Media solution, which allows brands and agencies to manage ad campaigns across their retail partners and for retailers to sell ad placements on their sites and apps. For publishers, our Criteo Direct Bidder product maximizes revenue for web and app publishers by directly connecting their premium inventory to our premium demand.

Over the past **15 years**, we have established our market position by focusing on three pillars: actionable commerce data, predictive machine learning technology and large consumer reach.

Key Focus Areas

Investing in substantial **Research & Development (R&D)** resources in order to conduct fundamental research on new advertising models and technology, enhancing the algorithms in the Criteo AI Engine, developing new features and products, conducting quality assurance testing, improving our core technology and enhancing our technology infrastructure.

Attracting, retaining and motivating highly skilled employees, particularly AI experts, software engineers and other employees with the technical skills that enable us to deliver effective advertising solutions, client sales and publisher partnership representatives with experience in digital advertising, in particular in Display Advertising. More broadly, hiring employees that are highly qualified in their areas of expertise to support and grow our operations.

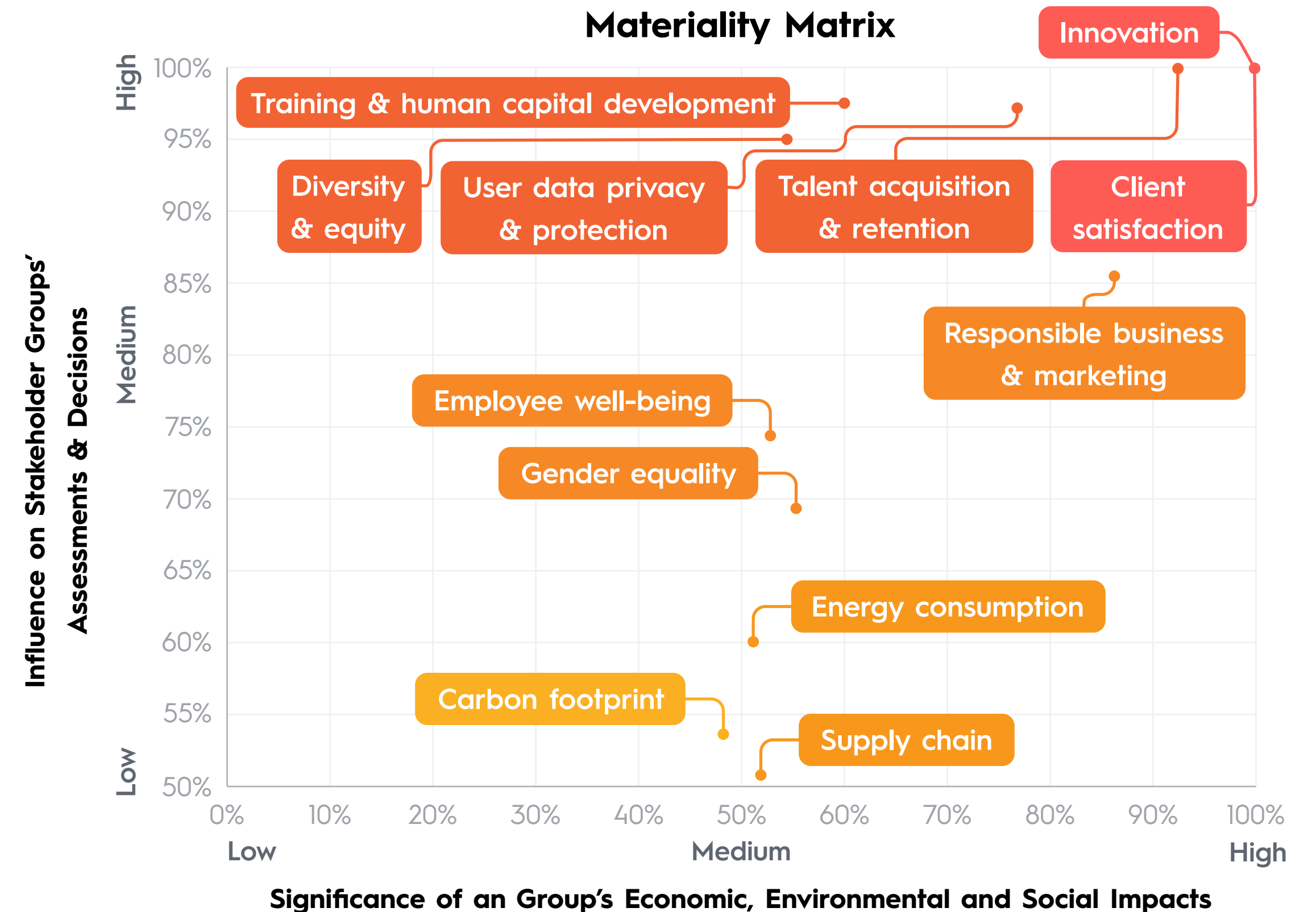
Privacy-by-design best practices that ensure that all our ads are designed with rigorous privacy standards while providing the best experience for each user.

CSR risks and materiality analysis

In 2018, Criteo performed its first CSR-related risk assessment. A list of sustainability-related risks based on benchmarks from our business sector was identified and surveys were conducted with internal stakeholders who work in CSR leading departments. These stakeholders classified the risks in order to achieve a priority list of areas of potential impact. Based on this analysis, Criteo selected five categories with eight focus areas.

In 2019, Criteo further developed the conversation on CSR by interviewing 12 more internal stakeholders from several departments: People Management, Talent Acquisition, Talent Management, Compensation & Benefits, Workplace, Internal IT, Legal and Investor Relations. They were asked to assess the importance and relevance of the CSR topics considered during the 2018 risk analysis and completed a few additional topics that were also relevant to Criteo's activities.

Combining the results of those interviews and of the risk assessment, we established our first materiality analysis. We consider this work a major step in further structuring our CSR approach. We intend to keep relying on it in future years to collect stakeholders' expectations on those topics.



CSR: Corporate Social Responsibility

¹List 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, Diversity and equity.

²List of the topics considered: Talent acquisition and retention; Gender equality; Diversity and equity; Training and human capital development; Employee well-being; Occupational Health & Safety; Energy consumption; Carbon footprint; Climate change adaptation; Circular economy; Cooling water consumption; E-waste management; Food waste; User data privacy and protection; Client satisfaction; Responsible business and marketing; Innovation; Supply chain; Local impact and philanthropy; Corruption; Food security; Animal welfare; Tax evasion; Respect of Human Rights.

Summary

Talent acquisition, development & well-being

Talent acquisition & retention

07

07

Training & human capital development

13

Employee well-being

21

Relation with clients & responsible practices

User data privacy and protection

31

31

Responsible business & marketing

42

Innovation

45

Client satisfaction

46

Environmental impact

49

Energy consumption

49

Carbon footprint

54

Responsible sourcing

65

Supply chain

Diversity

67

Gender equality

67

Diversity & equality

73

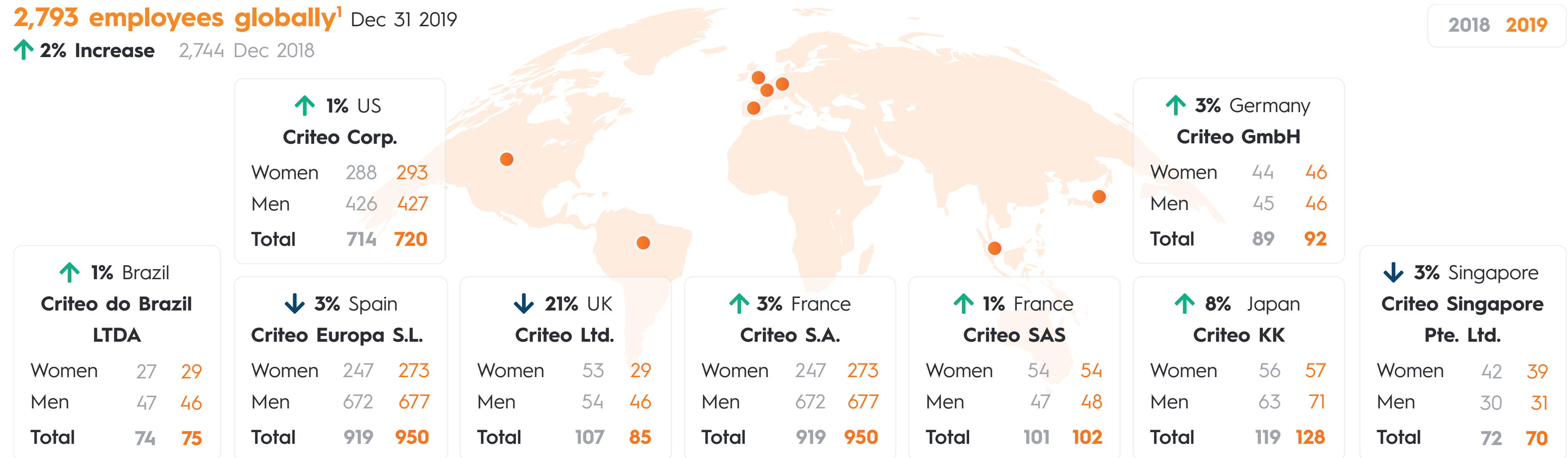
TALENT ACQUISITION & RETENTION

Headcount

Criteo operates in all corners of the globe and has 29 offices across the Americas, Europe, Middle East and Africa (EMEA) as well as Asia Pacific (APAC). The company's rapid growth over the last 10 years is spurring Criteo to invest in smart and talented people. Consequently, Criteo has implemented an ambitious talent acquisition policy. To support the teams, Criteo has created a strong corporate culture favoring the personal and intellectual development of its diverse workforce.

2,793 employees globally¹ Dec 31 2019
 ↑ **2% Increase** 2,744 Dec 2018

2018 2019



¹This figure includes all of Criteo's active employees on December 31 (permanent and non-permanent employees).

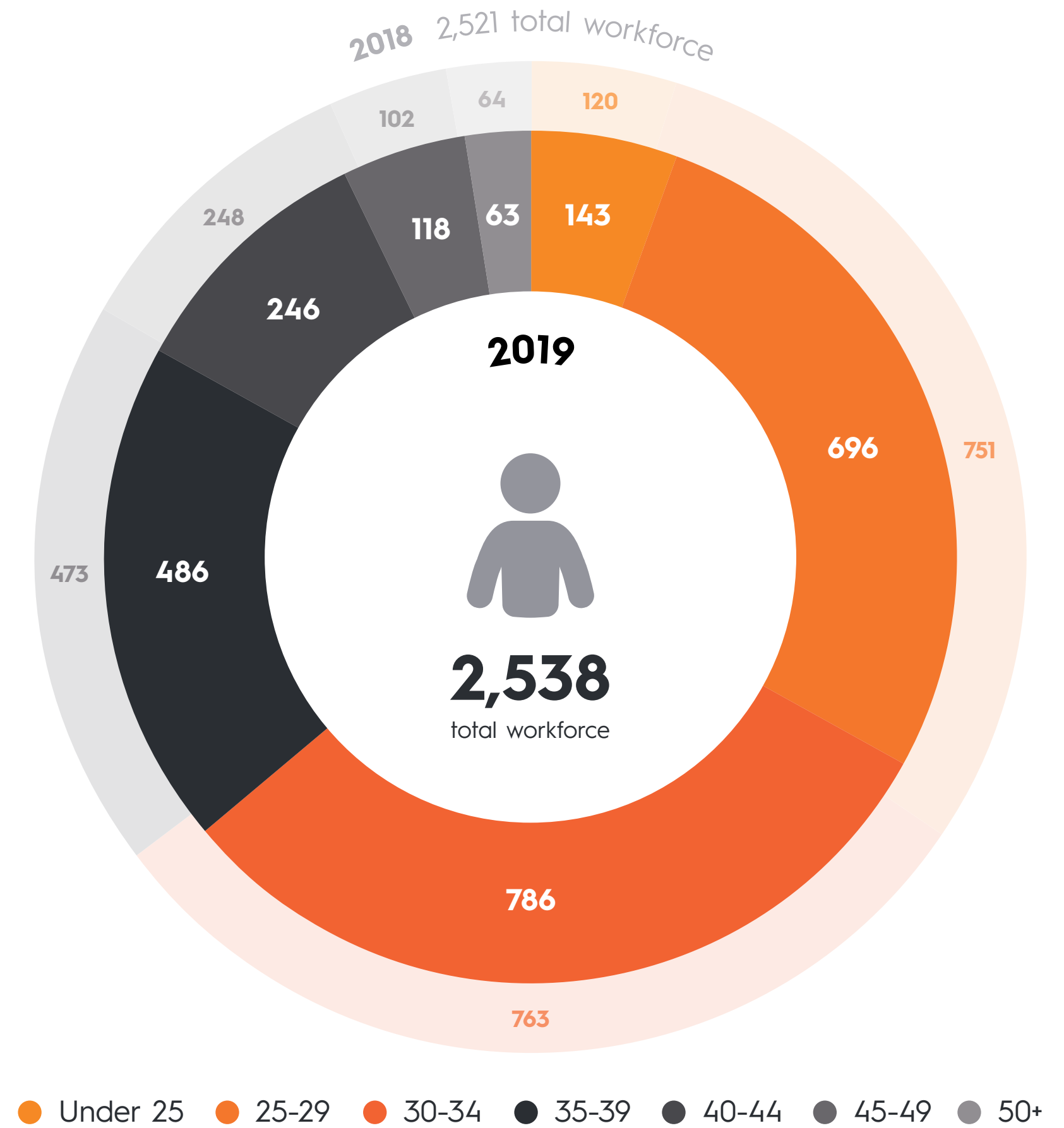
The workforce-related figures presented in this report only refer to Criteo's largest global legal entities, i.e. those with more than 50 employees. Legal entities that joined Criteo's financial scope during year N are included in the CSR scope in year N+1. As of December 31, 2019, the entities included in the CSR scope accounted for 91% of Criteo's total headcount, i.e. 2,538 employees (compared to 2,521 at the end of 2018).

TALENT ACQUISITION & RETENTION

Headcount

Criteo also acquired two new entities in 2018, manage.com and Storetail Marketing Services S.A., that were included in the CSR scope in 2019.

As of December 31, 2019, the **986 women in our headcount represented nearly 39% of the total workforce of 2,538**. Young people account for the majority of Criteo's employees, which is to be expected in a high-tech company relying on a workforce with skills in the latest trending technologies.



TALENT ACQUISITION & RETENTION

Recruitments & terminations

Continuous improvement of our recruitment processes

In order to continuously improve the quality of our hiring process, we implemented a global candidate experience survey. All candidates who enter our hiring process are given the opportunity to provide feedback.

Furthermore, every employee involved in recruiting activities pursues a dedicated training program, which was strengthened in 2019. This program gives them support in carrying out interviews and ensures the compliance of the recruitment process with regulations and Criteo's standards such as GDPR, non-discrimination, etc. It includes, for instance, a module about unconscious bias that started being rolled out across some of our teams.

Other programs are being implemented to help recruiters and interviewers target new candidate groups. **For example, in 2019, an event program specifically geared to increase the recruitment of female candidates was run in Japan.**

With the aim of ensuring consistency with the management of recruitment activity, in 2019, Criteo decided to implement a Talent Candidate Relationship Management (CRM) to manage external talent pools e.g. interns in a more efficient, consistent and compliant way to ultimately increase the number of hires. This Talent CRM is effectively in use as of January 2020.



Talent acquisition,
development &
well-being

Talent acquisition &
retention

Training & human capital
development

Employee well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

TALENT ACQUISITION & RETENTION

Recruitments & terminations

Focus on the R&D team

While talent acquisition is a major focus area for **all of** Criteo's activities, we pay close attention to our R&D teams, where candidates are tech engineers with specific profiles and our recruiting processes need to be adapted.

Criteo has made recruitment for the R&D team a high business priority, and for this reason, it is entrusted to a specific R&D Talent Acquisition Team who's working hard on selecting and attracting future talents. The R&D team is continuously partnering with the Tech Hiring Group, whose purpose is to assess technical skills consistently throughout the role. This group has onboarded and trained about 200 people in 2019.

The team is striving for the continuous improvement of its recruiting processes and tools. To this means, they are creating a new career platform to provide easier access to information about Criteo and the job positions we offer for candidates. This platform will be in use in 2020.

Some initiatives to improve candidate experience are conducted as part of the R&D Diversity & Inclusion Roadmap ([see the section dedicated to measures taken for diversity and gender equality for more details](#)). For example, **Criteo is trying to have at least one female interviewer per interview – especially when the candidate is a woman.** The wording of our job descriptions for R&D is also being revised to make them more inclusive and equally attractive to female and male candidates.

Criteo's Campus Program for R&D

Our Campus program is how the R&D team targets candidates before they graduate. Criteo works with a network of various schools and regularly participates in career forums that connect companies and students. Those events allow us to promote our activities directly to students, to meet with candidates and collect resumes, and to organize future interviews. The Campus Program recently diversified its approach by increasing the focus on schools and universities where candidates present more diverse profiles, both socially and ethnically.



TALENT ACQUISITION & RETENTION

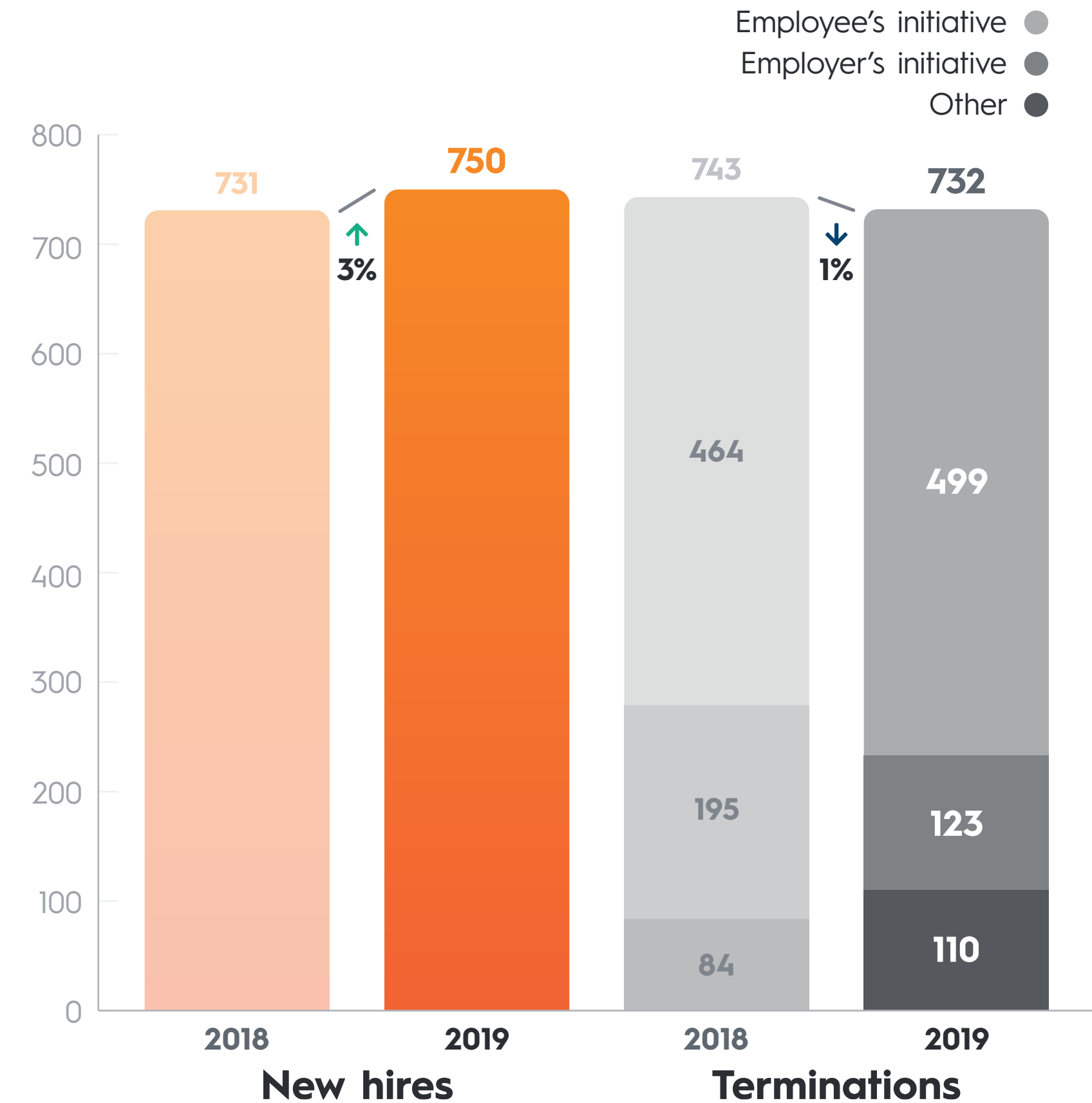
Recruitments & terminations

Hires and terminations

In 2019, 732 employees exited the company and 750 were hired across the globe.

Criteo is closely monitoring its attrition rate and puts in great efforts to better understand and reduce it, as much as possible. That is why the company has been building a data base with the aim of being able to analyze the reasons for departures. Those analytics are making it easier to predict attrition rates depending on geographic areas and populations. More importantly, they enable Criteo to anticipate the number of recruitments needed.

In the coming years, Criteo intends to find ways to attract more diverse talents and work on employee engagement to improve the retention rate.



TALENT ACQUISITION & RETENTION

Compensation & benefits

In the tech sector, compensation is a critical differentiating factor if one wishes to attract and retain talent and to stand out from the competition.

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

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

In 2019, annual base and variable salary compensation payouts for the legal entities included in this CSR report were €243,901,688 – a 6% increase compared to €225,401,401 in 2018¹.

Criteo does not discriminate any category of employees through remuneration, and is currently working on tools to facilitate the monitoring of salary gaps across the company depending on gender, age, etc.

¹ Respectively \$273,116,037 in 2019 and \$266,626,994 in 2018



TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

In 2019, Criteo kept investing in its people-development programs, both in terms of resources and organization as well as processes and experiences, demonstrating the importance granted by the company to talent growth and management.

A Talent Development team was put in place to focus on the Sales and Operations (S&O) department, which makes up more than **1,700 Criteo employees**. They are supported by the People team and two existing training teams, to deliver on new training objectives.



Those teams include:



The Criteo go-to-market Operations team

In charge of giving our sales and operations people knowledge about our products and their evolutions or new launches.



The Global Learning & Management Development team

In charge of the digital learning strategy and implementation of resources, as well as the development of the Global Management & Leadership Development and Engagement.

Talent acquisition,
development &
well-being

Talent acquisition &
retention

Training & human capital
development

Employee well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

Key initiatives can be translated into quantitative data.

Global Management and Leadership Development Curriculum

This curriculum is made up of three programs, which are designed to help our employees' transition and grow throughout their career path. It represented 15% of the reported instructor-led training hours in 2019, or 4,530 hours. The impact of this course can positively be correlated to the Manager Effectiveness survey insight. Launched in 2019, the curriculum saw the launch of a new Development Culture Program that is on-going: this coaching course was rolled out in 2019 for the HR team and selected "champions". It will be the foundation for the second stage that we intend to deploy in future years, in the form of an internal curriculum that will allow every employee in the company to be trained.

Discover

This behavioral tool is used within our Mid-Market EMEA team to encourage a culture of self-awareness and self-development as well as to improve communication in and out of Criteo. It is currently being used by S&O and is becoming a part of our company culture. This is enabled due to the growing amount of certified trainers such as training managers, people experience managers, global learning, etc.

Coaching Culture

The Mid-Market EMEA team helped its leaders develop advanced coaching skills and set up a coaching platform where leaders can volunteer to coach individual contributors based on their respective profiles. These contributors can sign up for an on-demand coaching conversation process. The emphasis is also placed on behavioral development, which has been implemented in the performance review.

R&D

Diversity & Inclusion training for hiring managers were delivered to raise awareness of the topics and ensure that we incorporate them into the recruitment process.



Talent acquisition,
development &
well-being

Talent acquisition &
retention

**Training & human capital
development**

Employee well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

criteo.

TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

Criteo's go-to-market Operations team also started a new training program in February 2019 to facilitate the change induced for S&O teams by the shift in Criteo's positioning on the market, from a 'product-selling' to a 'service-selling' company.

This program consists of an ACC 'blended' training program with online & live sessions, Pitch Clinic Process, role-play sessions, Cascading Style Sheets (CSS) training program, etc.

Finally, training sessions answering compliance purposes are also carried out and improved every year, such as the training on the "Code of Conduct" which was reviewed in 2019.

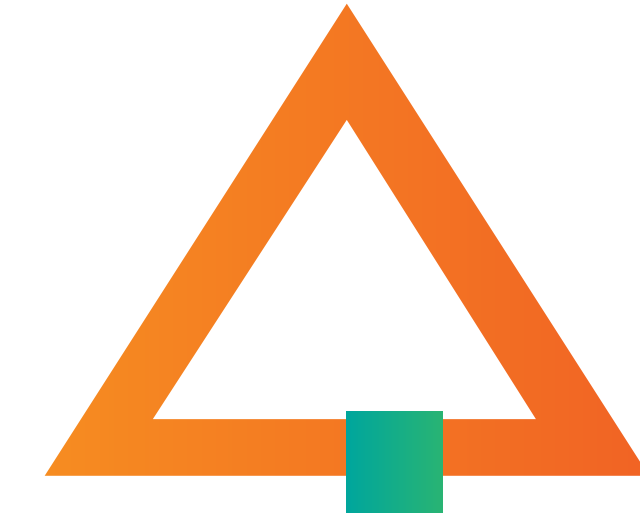
Although this report focuses on formal training activities, whether instructor-led or online, much more is happening in the field and the office on a day-to-day basis, ranging from Criteo's cross-functional teams and organizations, through peer-to-peer learning to social learning activities. These more 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.



TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

In-class training highlights



↑ **24%**

increase in training hours

25,426 hours in 2018

🕒 **12.2**

hours per employee (average)

10.1 hours in 2018

🌍 **15%**

of total training hours across all entities

Criteo's Global Management &
Leadership Curriculum

31,539

Instructor-led
training hours

2019

👤 **80%**

of employees benefited

56% in 2018



10%

of hours represent the
Development Culture program

44%

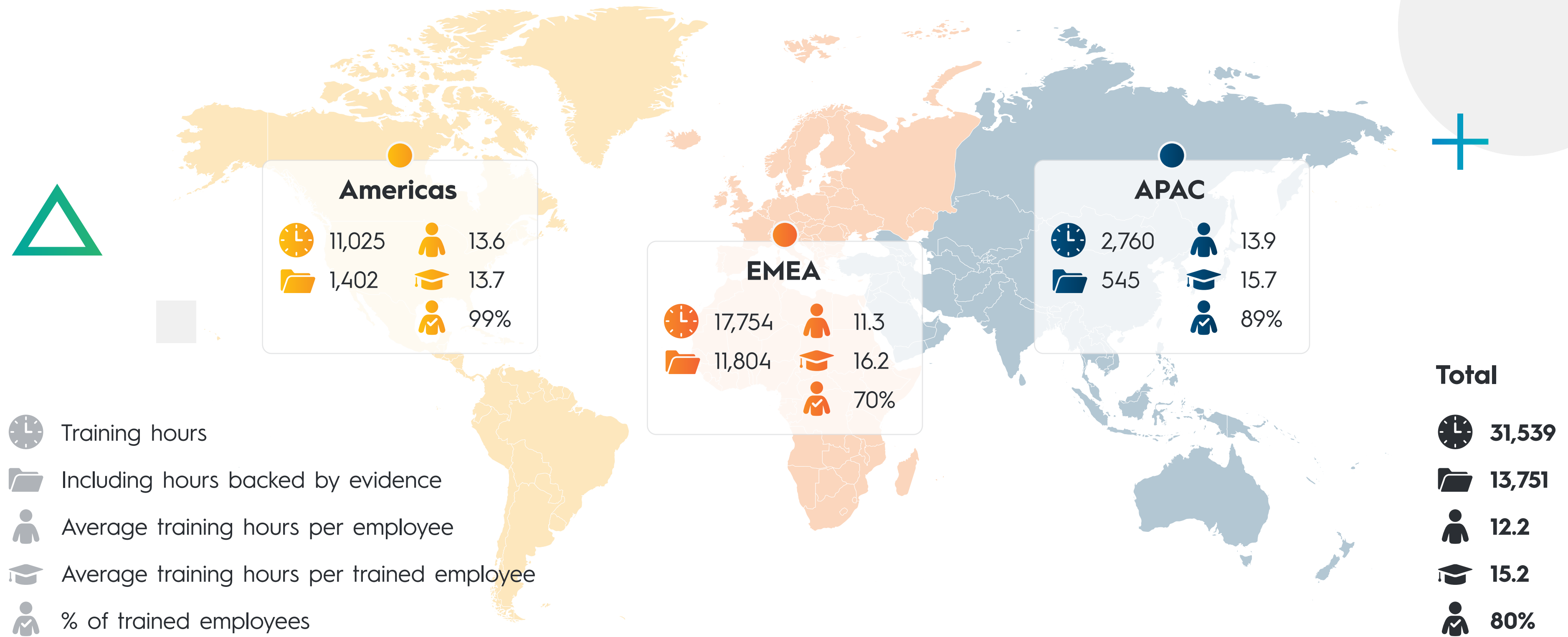
of hours are backed by attendance sheets or training certificates

This has been mainly driven by the continuous commitment and discipline of People Experience and training managers in France, APAC and Brazil, as well as the Global Management and Leadership Curriculum roll-out which systematically collects evidence of attendance.

TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

In-class training highlights



TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

Core on-line training highlights



4,100
further online training hours

- Compliance (12%)
- FlyCriteo On-boarding (55%)
- Customer Relationship Management (8%)
- Digital Illiteracy or security with Criteo applications (25%)

↑ 16%
increase in online training hours

9,957 hours in 2018¹

LinkedIn

New partnership with LinkedIn Learning (2019)

All Criteo's employees now have access to this training platform, and 60% of them activated their LinkedIn Learning license within the six months following the implementation of the platform. This activation rate can be considered outstanding in our sector, proving the popularity of this new digital training offer.

Improved communication and higher utilization rate regarding our Coursera courses

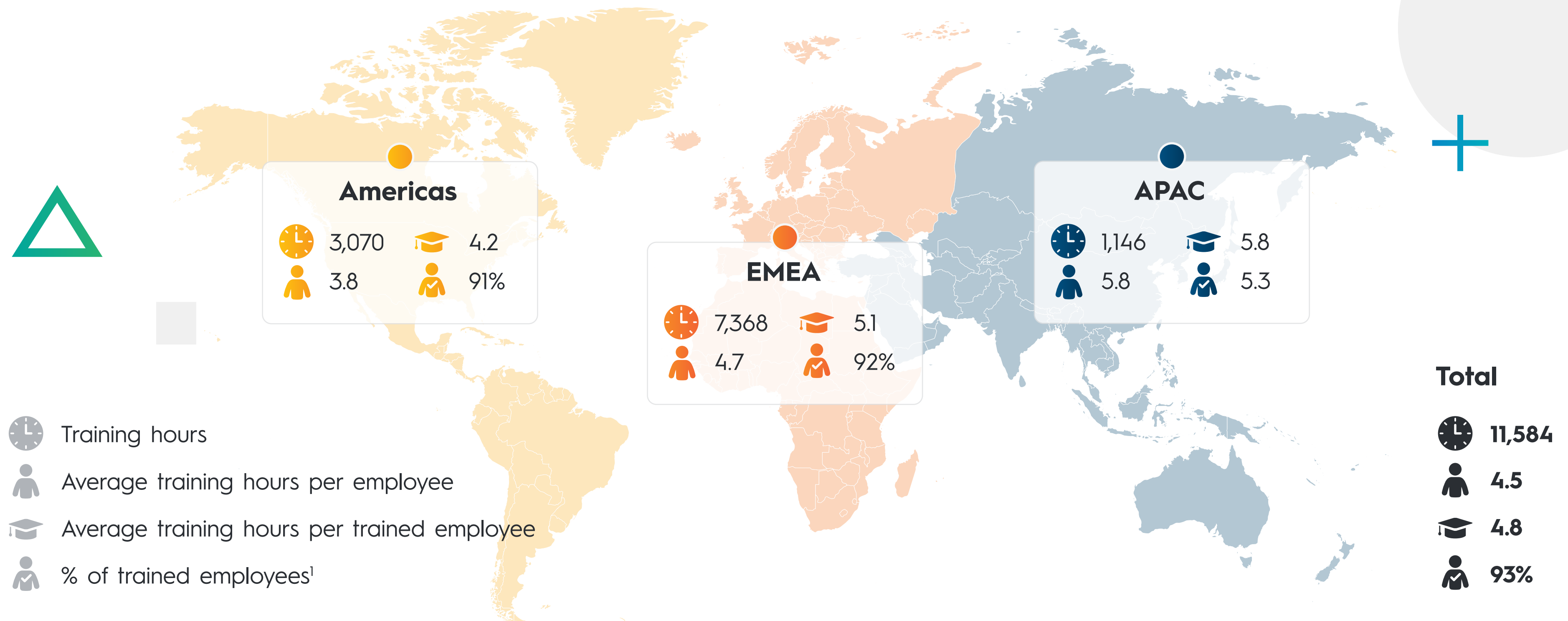
Accounts for an important share of the online training hours.

¹ The methodology used to calculate online training hours have been revised in 2019. 2018 data has not been recalculated based on the updated methodology.

TRAINING & HUMAN CAPITAL DEVELOPMENT

Training

Core on-line training highlights



¹ Figures above 100% are explained by the fact that in some entities with a high turnover, an important number of the people trained during the year might have left the companies at the end of the year.

TRAINING & HUMAN CAPITAL DEVELOPMENT

Peer-to-peer & social learning practices

Peer-to-peer and social learning is part of Criteo's 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 the employee base.

Criteo took steps in 2019 to become a Learning Organization with the creation of dedicated learning content, the boost of digital training programs, and the identification of learning champions and relevant tools. The company intends to further continue this transformation in the coming years.

Practices at a local level

"9:30" or "lunch and learn" initiatives with an informal knowledge-sharing session from subject matter expert volunteers. In 2019, it was used also in the Retail Media product unit to share information across EMEA on the new retail media platform.

Criteo "Confident Communicator Club", an internally-led initiative to help improve presentation skills.

Practices at a department level

"Train the trainer" in-house program or Certification for Casual Facilitators from Mid-Market, led by local training managers, for Customer Success and Innovation EMEA teams or for "Feedback" champions within the Global Services team.

"Machine-learning boot camp": an in-house facilitated intensive program, open to developers. Offered twice a year, in Paris and Palo Alto, it is made up of two to three weeks of instructor-led sessions from a panel of internal experts and several weeks learning transfer practice through capstone projects or "Voyager" programs, rallying another R&D team for stretch assignments.

EMPLOYEE WELL-BEING

Wellbeing & diversity at work

Employee health and safety is a priority for Criteo. The company devotes time and effort across all its locations to provide positive working conditions, work-life balance and the healthiest office environment for its employees.



EMPLOYEE WELL-BEING

Safety & wellbeing at work

Working hours

While there is no explicit global policy for working remotely at Criteo, regional or country leadership teams are free to authorize it.

In the **Americas**, working remotely and on flextime are common practices. Employees who have long commutes or good reasons to work from home regularly use this option.

In **EMEA**, Criteo generally expects employees to be in the office during normal work hours. There is no formal remote working policy in place. However, employees are allowed to work outside the office occasionally after consulting their team/manager.

Criteo also has a practice of allowing people to work from Criteo offices in other countries. In France, an agreement has been signed in February 2019 allowing people in the Paris office to work from home one day per week.

In **APAC**, Criteo offers flexible work hours to enable a healthier work-life balance. This is especially the case in Japan and India where employees have long commutes so they can arrange their work time to best avoid peak hours. In most APAC countries, this has been implemented on an informal basis, except for Japan where it is included in our policies.



EMPLOYEE WELL-BEING

Safety & wellbeing at work

Safety at work

Although Criteo has not yet deployed a global safety policy, the company aims to ensure a safe workplace environment and provides its offices with all necessary safety measures, and generally surpasses local applicable regulations.

The safety of employees traveling for business is also important to Criteo. In 2016, Criteo launched a new **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 traveling, and also tracks all Criteo travelers so that they can be identified and Criteo can reach out to them in an emergency.

The Workplace team's objective is to establish a global, robust and effective Health and Safety Management System. To this aim, they have started working in 2019 on the implementation of a global Health and Safety standard for all of Criteo's offices.



EMPLOYEE WELL-BEING

Safety & wellbeing at work

Employee wellbeing

Criteo is committed to promoting employees' physical and mental wellbeing. To this end, regions are allocated a budget, distributed between the offices, to encourage employees to exercise. **Sport and physical activities are part of Criteo's DNA and each region provides employees the opportunity to exercise with social and low-cost services by offering on-site wellness activities such as yoga, massages or sport subsidies to attend external sports clubs and gyms.**

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

In addition, Criteo is sensitive to the mental wellbeing of its employees. It can be difficult for people to open up about mental health concerns, but Criteo is continuing to investigate options to roll out employee-assistance programs across all countries. For instance, to ensure a no-stress environment at the office and to be proactive on the subject, Criteo offers in a few countries an employee assistance service. This free and confidential external helpline service can be reached 24/7 for advice and support on a variety of issues. In other countries, employees can benefit from five free counseling sessions. Also, when a specific incident occurs, such as a terrorist attack, Criteo's People and Workplace teams create tailor-made solutions as soon as necessary in order to support employees.

Talent acquisition,
development &
well-being

Talent acquisition &
retention

Training & human capital
development

Employee well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

EMPLOYEE WELL-BEING

Employee relations

Communication and transparency are areas of focus at Criteo.

Internal communication

Criteo hosts a company-wide “Global All Hands” event twice per quarter, led by the CEO and members of the Leadership Group to provide key business updates and allow employees to ask questions. Each department has regular functional “All Hands” to disseminate further information on key business priorities and performance metrics. Changes involving systems, processes or other issues impacting employees are communicated in face-to-face sessions to supplement emails on the topic, allowing employees to ask questions or raise concerns. In addition, many groups have Slack channels to communicate real-time updates and feedback to employees. Social Media channels are also used to inform both external and internal populations.

In 2019, Criteo focused on the automation of its Human Resources processes in order to increase the reach and efficiency of HR-related communication and actions.

A “People Portal” was set up by the People team: an HR intranet portal meant to allow employees to have easier access to HR-related information, including both global-level and country-level specific information. Since it opened in 2019, over 2,000 employees have been using the People Portal, with around 150-200 employees currently consulting it per day.

Criteo also implemented “AskPeople”, a user-friendly ticketing solution based on the Salesforce platform that is used by employees to ask their HR-related questions (policy, benefits, change requests, etc.). It’s also used as an internal tool within the People team to allocate and track work between different teams. The initiative has been completely rolled out and is proving successful with about 21,000 tickets logged by employees annually. About 65% of employees are now using this tool.

The company has been strengthening the global Onboarding program with a global buddy initiative for new joiners: we are now partnering newcomers with another employee in the same location to help their integration when they just arrived at Criteo.

EMPLOYEE WELL-BEING

Employee relations

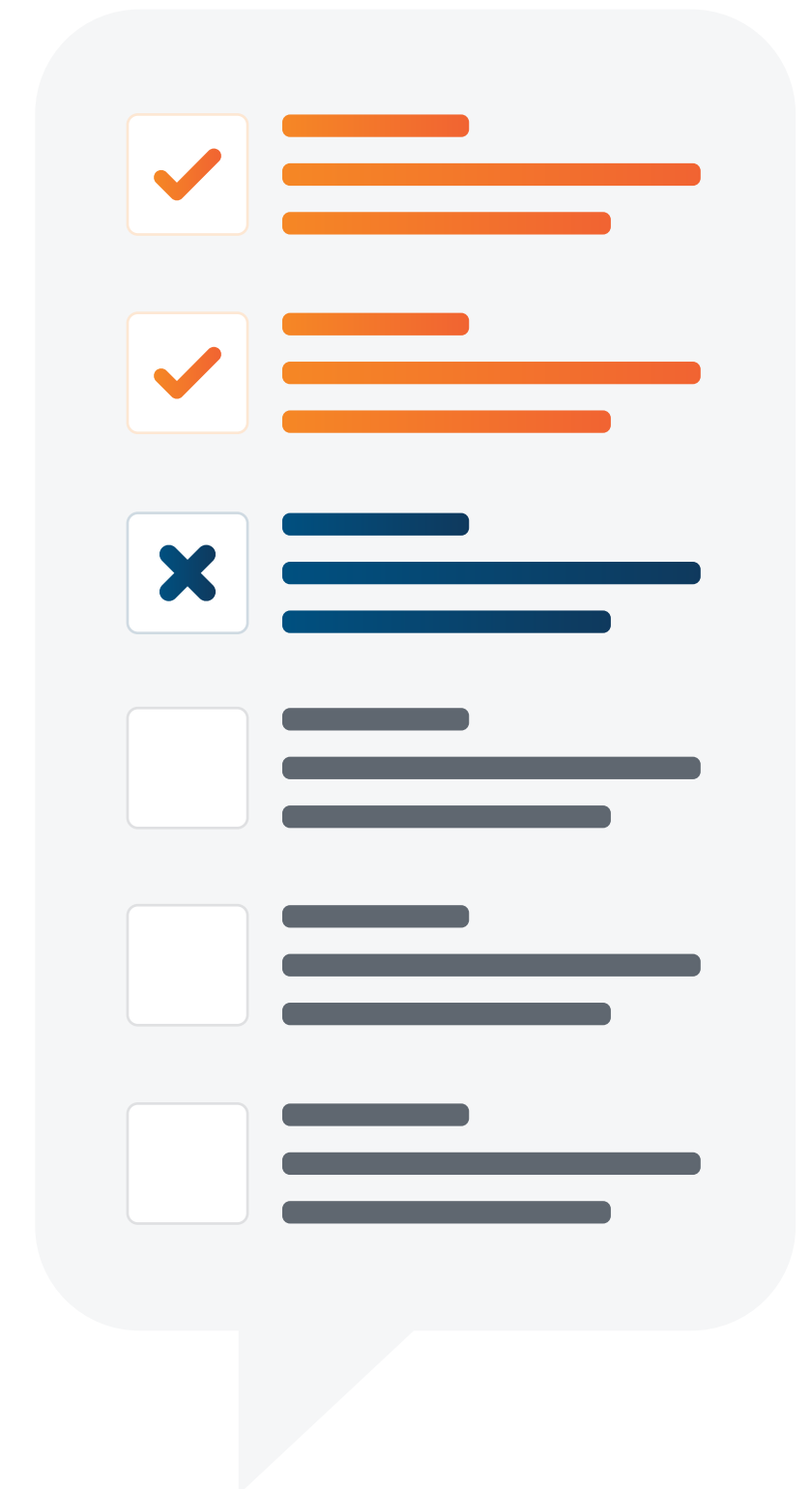
A culture of feedback

Criteo strives to create a culture of feedback and continuous learning. We, therefore, promote feedback at different levels of the organization and as an important part of our company

culture: for example, the People team supports managers and employees through dedicated trainings to give and receive feedback in a constructive way. Also, in 2019, changes were made to the Performance Review process for the 2020 cycle to have more frequent feedback conversations between managers and employees.

We also regularly give employees the opportunity to share their feedback on different aspects of their employee experience in a more formal way through employee surveys. As one of the main initiatives, for the third year in a row, Criteo partnered with Glint to gather employee feedback and work on improving the employee experience.

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



EMPLOYEE WELL-BEING

Employee relations

Moreover, once a year, Criteo runs a company-wide engagement survey as a sort of health check for the organization and to understand our main strengths and areas of improvement. The survey reviews scores from 29 questions and qualitative comments left by employees. **In 2019, the participation rate reached a record 81%.** Compared to the prior year, the global engagement score slightly dropped from 72 to 70 on a scale from 0 to 100, compared to an external industry benchmark of 74. 69% of respondents recommended Criteo as a great place to work. 66% of respondents said that they were happy working at Criteo.

Main strengths identified through the engagement survey

Scale: 1-100

The survey respondents...



Talent acquisition,
development &
well-being

Talent acquisition &
retention

Training & human capital
development

Employee well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

EMPLOYEE WELL-BEING

Employee relations

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

Similar to previous years, in 2019, Criteo also used a manager survey, where employees provide feedback about their direct managers. Based on the results, managers can identify areas for professional development. Every manager gets a detailed report of the feedback provided by their teams. Results are reviewed and action plans defined for managers with the People Experience team. People Partners also conduct reviews of high-level results per function with Executives.



Talent acquisition,
development &
well-being

Talent acquisition &
retention

Training & human capital
development

Employee well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

EMPLOYEE WELL-BEING

Employee relations

Employee engagement

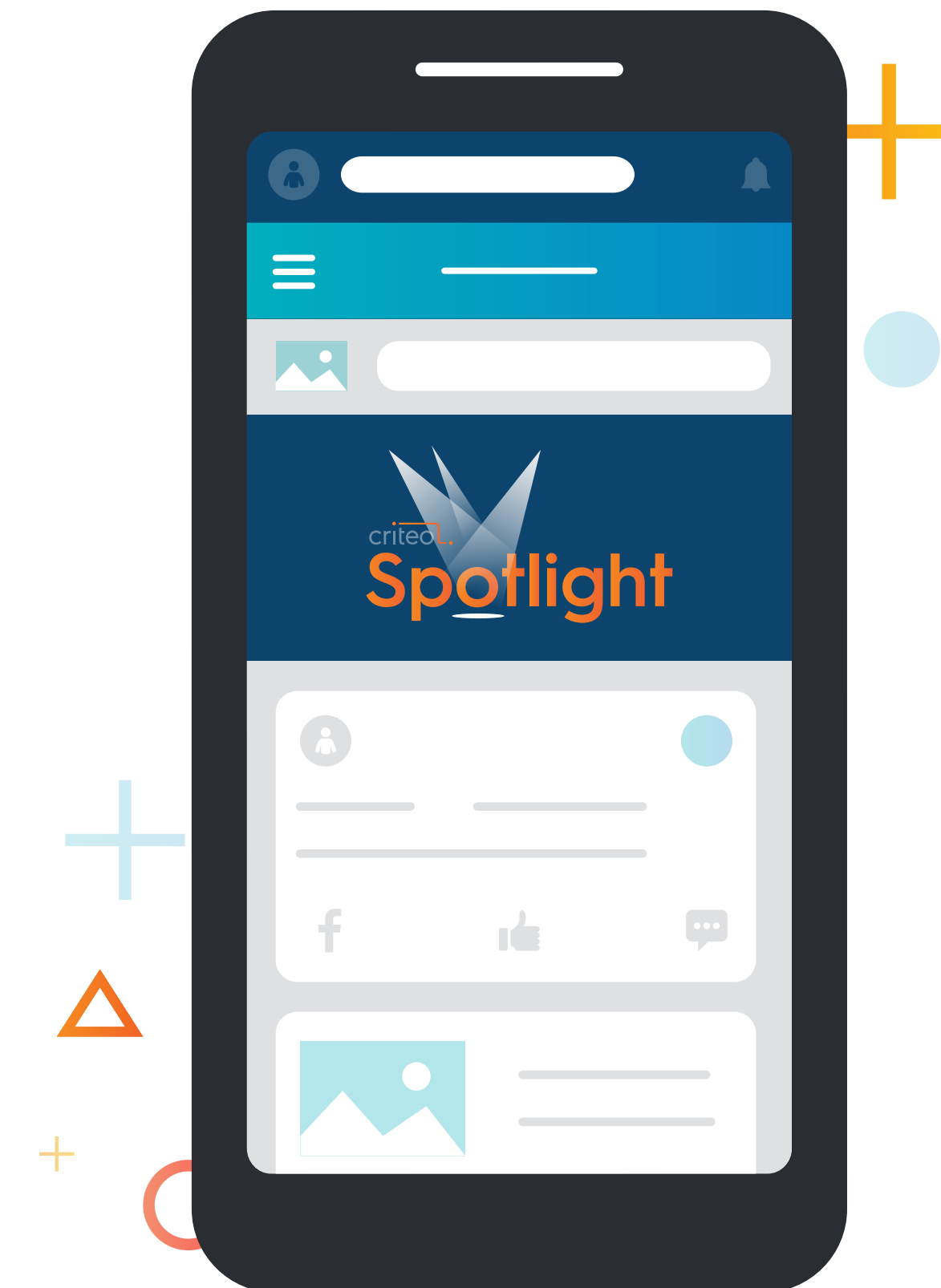
Spotlight is the new global recognition program, available for all employees within a platform. It launched in July 2019, and the goal is to reward every small or big thing employees are doing at Criteo.

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

The platform also allow us to recognize great actions performed for Criteo Cares or even to celebrate employees' Criteo anniversaries.

With more than a 95% activation rate, the platform is a success and is used across regions and departments.

In 2019, Criteo maintained a high position on Glassdoor's Best Place to work in France. As the market becomes increasingly competitive, we continue to seek opportunities to improve the way we attract, engage and retain the best global talent.



EMPLOYEE WELL-BEING

Employee relations

In November 2019 the Connect And Keep Engaging (CAKE) platform was rolled out globally for all Criteo employees.

CAKE is an employee advocacy tool implemented primarily to give access to Criteo's employees to all the information they need about the company, and to provide an easy way to share this information both internally and externally. Employees can now stay up-to-date with the latest company news using one single platform, available everywhere, on desktop and mobile. The key objectives of CAKE are:



Building the Criteo Community by bridging internal and external communication.



Developing support for spreading our culture and values.



Engaging our employees in social media, proudly representing the Criteo brand.



Attracting potential employees and future talents interested in joining Criteo



Breaking silos between our different departments and sharing news from different channels e.g. House of Deals, House of Tech, People Vibes, Criteo Cares events, etc.



Promoting our brand through success stories told by our employees.

Today, a third of Criteo's employees are connected to the platform, with the objective to have 100% of them connected in the future. Beyond internal use, CAKE can also be rolled out with external stakeholders and we aim to share this platform with communities we work with.

Talent acquisition,
development &
well-being

**Relation with clients &
responsible practices**

**User data privacy &
protection**

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Compliance

Criteo has adopted a Code of Business Conduct & Ethics (the “Code”) setting out the policies and procedures that reflect our commitment to maintaining the highest standards of honesty, integrity and ethics when conducting Criteo’s business. In February 2020, Criteo’s Board of directors also adopted a Human Rights Policy.

[For additional information on those policies, please see our 2020 proxy statement.](#)

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteo.

USER DATA PRIVACY & PROTECTION

Data privacy

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

Since our first product offering in 2008, we have delivered the highest levels of security and data privacy across our portfolio of products, technologies and services - in line with the 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, Criteo's Data Privacy Officers rolled out a new privacy policy that covers all of Criteo's products in September 2019. This new privacy policy is more user-friendly and more transparent for customers regarding their rights when it comes to data and how to exercise them, for example, about the right to be forgotten. The Policy is available on Criteo's website.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteo.

USER DATA PRIVACY & PROTECTION

Data privacy

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 mere placement of a revocable cookie or mobile advertising ID on a user device, after collecting consent when requested by law.

Key elements of the Privacy by Design approach also include:

- As required by the GDPR, since 2013, we have had a designated Data Privacy Officer along with a team of privacy experts.
- These experts sit within the Product and R&D department. They perform ongoing Privacy Impact Assessments to monitor potential risks during the product lifecycle and proactively mitigate those risks.
- The Data Privacy team delivers company-wide privacy training, enforces codes of conduct, and is integral to ensuring that we build best-in-class products and services.

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



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Data privacy

Strict security measures

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

Also in accordance with GDPR requirements, Criteo implemented in 2018 a **Privacy Compliance Management Software** that allows the company 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 2019.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Data privacy

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

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

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Data privacy

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

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

We believe that this transparent, consumer-centric, and controllable approach to privacy empowers consumers to make better-informed decisions about our use of 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 on the market.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Data privacy

Industry & leadership

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

- [Network Advertising Initiative Standards](#)
- [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](#)



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteol.

USER DATA PRIVACY & PROTECTION

Data privacy

Data privacy at Criteo

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

Moreover, awareness-raising programs with regard to cybersecurity were carried out for Criteo's employees, and in 2019 new training were developed. The company also organized a "cyber security office" in October 2019, aimed at making employees better aware of the risks related to cyber-security and the way to prevent them. This was done through workshops, challenges, presentations by external speakers.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteo.

USER DATA PRIVACY & PROTECTION

Tax evasion

Criteo's management is committed to ensuring that all of their entities meet their tax obligations and comply with the relevant tax laws in each jurisdiction in line with their Code of Business Conduct and Ethics and OECD guidelines.

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

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

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

For more details regarding tax management, please refer to our most recent Annual Report on Form10-K.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Corruption

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

To control the corruption risk, Criteo employees have to follow two main policies:

Criteo's Code of Business Conduct & Ethics

(updated Jan. 2017)

Our Code of Business Conduct & Ethics, which includes a summary of our Global Anti-Corruption Policy, strictly prohibits our employees (or any third party acting on our behalf) from offering or accepting anything of value (including but not limited to gifts, meals/entertainment, money or services), directly or indirectly to a foreign government official, political official or private/commercial third party, for the purpose of influencing official acts, obtaining or retaining business or to secure an improper advantage.

Criteo's Global Anti-Corruption Policy

(updated Apr. 2018)

Provides further details on our anti-corruption policies and procedures, including definitions and examples of situations that present corruption risk, and the responsibilities of employees and managers to comply with the policy and ensure their subordinates do so as well. It also details our anti-corruption due diligence policies and procedures with respect to agents, consultants and other third parties, and summarizes the anti-corruption laws and regulations in the various countries where Criteo conducts business.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

USER DATA PRIVACY & PROTECTION

Corruption

All Criteo employees are required to complete an online anti-corruption course and sign an online acknowledgment that they have read the Code and related policies and agree to follow it during the course of their Criteo employment. An alert mechanism to report potential violations or questions regarding the Code is available for employees, and is presented with further details in the section 'Diversity and equal opportunities'.

Moreover, higher risk employees, e.g. Sales team members in higher-risk countries for corruption, periodically receive mandatory in-person training on our Anti-Corruption Policy and procedures.

Criteo also has in place a global Whistleblowing Policy, which provides guidance on the reporting and handling of concerns regarding misconduct or unethical behavior. The Whistleblowing Policy applies to all Criteo employees, as well as Criteo's directors, temporary workers, consultants and interns in the context of their professional duties.

In 2019, a new version of the training regarding the Code has been developed and deployed.

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

RESPONSIBLE BUSINESS & MARKETING

Criteo cares

Criteo’s very own social responsibility program is called Criteo Cares.

Criteo’s very own social responsibility program is called Criteo Cares. The program’s mission is to leverage the company’s unique assets for social and environmental good, while fostering a diverse workplace culture where all employees feel they belong and are cared for.

The program rests on four pillars:



Community Giving



Diversity



Inclusion & Belonging



Environment

Global and regional committees have been created to help develop the program strategy and drive initiatives aligned with the program pillars.

Talent acquisition,
development &
well-being

**Relation with clients &
responsible practices**

User data privacy &
protection

**Responsible business &
marketing**

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

RESPONSIBLE BUSINESS & MARKETING

Criteo cares

In 2018, Criteo introduced the Volunteer Paid Time Off program (VPTO) to encourage all employees, through its Criteo Cares program, to volunteer their time and give back to their community.

VPTO is two days in which an employee volunteers their time to support CSR initiatives with non-government or non-profit organizations of their choice.

The purpose of the VPTO program is to:

- **Offer employees an opportunity to serve their local communities**
- **Advocate for and support those in the community that need help the most**
- **Build a stronger Criteo culture by encouraging employees to do good – together**

Employees are encouraged to motivate and organize their own local events which are sponsored by Criteo Cares through a regional budget for partnerships and sponsorships. The strength of the program is its grass-root initiatives created from the passion and interests of the employees themselves, to mention a few; Employee Resources Groups such as Women@Criteo and LGBT+, a green guide to share local practices and recommendations for a more environmental friendly lifestyle. Furthermore, global social environmental awareness event celebrations are decided publicly with committees and through the Criteo Care's Slack channel.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteol.

RESPONSIBLE BUSINESS & MARKETING

Criteo cares

Thanks to the employee-led approach of the program, it received the Monster Innovation Prize in Paris 2019.

As an established program, Criteo Cares works as an advocate within its scope to influence and support different teams and projects such as; an environmentally friendly welcome package, advising for community giving team buildings, an environmentally friendly approach for a sustainable strategy for data centers, travels and office management, cooperation with the People team on diversity matters.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteol.

INNOVATION

Hackathon

At Criteo, we believe that innovation is part of everyone's job and is critical for Criteo to stay ahead of the competition.

The "Hackathon" provides support and flexibility needed to turn employees' ideas into reality. Employees are invited to submit their ideas related to product innovation, revenue generation, profit optimization, or business efficiency.

This initiative is a great opportunity to acquire or leverage skills and knowledge "on the job" on topics that people are passionate about.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

criteo.

CLIENT SATISFACTION

Dialogue with stakeholders

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



Employees



Investors & shareholders



Clients, prospective clients, & publishers



Technology partners, suppliers and subcontractors, and in particular data-center operations

The company engages with other categories of stakeholders through adequate 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 (including Youtubers and bloggers), research centers and labs, employee representatives and unions, banking partners, financial analysts and influencers, schools and job applicants, and partner non-profit organizations.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

CLIENT SATISFACTION

Clients & publishers

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

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

Criteo provides unique inventory with unparalleled reach to its clients through the Supply Publisher and Platform Partnership Teams, who work with premium supply partners to directly integrate their systems with Criteo via header bidding or real-time bidding technologies.

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.

1,200 professionals globally

Analytics Sales & account strategy
Creative services Technical services teams

Criteo's clients receive seamless, high-quality support & actionable insight.



\$5.1B spent with publishers over the last 5 years

102 countries distributing content and tools

¹ Quarterly retention rate represents the percentage of live clients during the previous quarter that continued to be live clients during the current quarter.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

User data privacy &
protection

Responsible business &
marketing

Innovation

Client satisfaction

Environmental impact

Responsible sourcing

Diversity

CLIENT SATISFACTION

Investors & shareholders

We are actively engaged with the investment community through a number of channels.

Over the course of 2019, senior management and the Investor Relations team discussed our strategy and business development with institutional investors and analysts. We hosted various events for buy-side analysts and investors in Paris, New York, and Boston. Members of the Investor Relations team as well as senior management participated **in more than 25 investor conferences in North America and in Europe**. Investors can access a wide range of information about Criteo and its shares online. We webcast all key investor events at which our CEO or CFO speak, and we post all relevant presentations on the Investor Relations Web site. Shareholders can reach the IR team directly by sending an e-mail to investorrelations@criteo.com.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

ENERGY CONSUMPTION

Reduce Criteo's environmental impact

At Criteo, people care about the environment.

Although there is currently no formal global environmental policy in place, the company is conscious of its environmental footprint and aims to minimize it.

The nature of Criteo's activities leads the company to implement tangible actions for several aspects such as management of the data centers and its data resources, promotion of green offices, and raising awareness among workers on sustainable practices that will prevent harmful consequences for the environment or society.

In addition, in compliance with the French law "Pacte Act" ¹, Criteo's shareholders will be asked to vote the modification of the articles of association of the company so as to include that the Board shall take into account social and environmental aspects when defining the company's strategic orientations.



¹ Law no. ° 2019-486, 22 mai 2019 - Plan d'Action pour la Croissance et la Transformation de l'Entreprise (Action Plan for the Growth and Transformation of Companies)

ENERGY CONSUMPTION

Data center & resources management

Criteo's operations rely on large data center units and several smaller networking rooms, also known as Points of Presence (POPs). POPs are similar to small-sized data centers. In 2019, Criteo installed its servers in 14 data centers worldwide, all of which belong to external service suppliers. Among those 14 locations, 10 are data processing centers and the remaining four host network POPs. Criteo's server infrastructure accounts for one of its largest environmental impacts.

In 2017, a team dedicated to capacity planning was created to ensure optimal allocation of infrastructure resources according to business objectives: this means that Human Resources are now dedicated full time to optimizing Criteo's infrastructure usage regarding costs and power usage. As a result, robust growth forecasts have been implemented, establishing reliable budget and actions to reduce costs and energy consumption.

Criteo is working to enhance sustainable practices among vendors for both services (hosting and hardware recycling) and hardware procurement. For each new Criteo project, the company releases a Request for Proposal (RFP) to several potential partners, and one of the main criteria of the decision matrix is labeled as "Eco Responsibility". This criterion encompasses various questions about the energy-saving processes, the source of energy of the data center, its Power Usage Effectiveness (PUE)¹, which shouldn't exceed a rate of 2, and other eco-related topics.



¹ 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.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

ENERGY CONSUMPTION

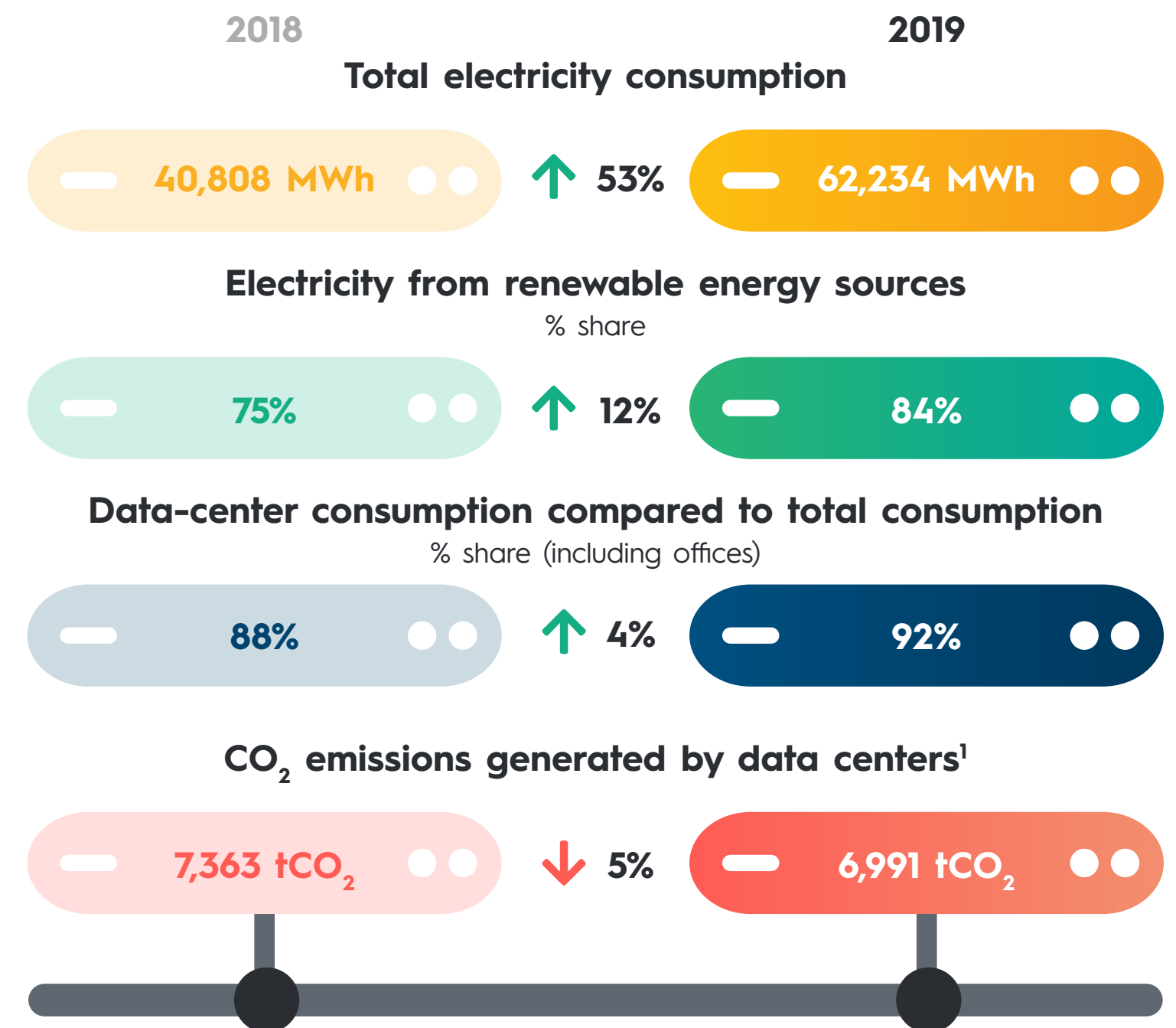
Data center & resources management

The evolution in data center electricity consumption is due to the activity growth, leading to the implementation of new servers in our data centers and to the opening of a new data center in 2019. Comparatively, the decrease in emissions generated by data centers can be attributed to Criteo's efforts in relying on renewable energy sources.

In **2018**, thanks to the efforts made in the selection of data centers and a change in the methodology², we were able to significantly increase the share of renewable energy in our data centers – up from 15% in 2017 to 75% in 2018.

In **2019**, Criteo continued striving to improve the environmental impact of data centers and started to compensate for the emissions of two data centers. This initiative allowed Criteo to reach a new milestone in relying on renewable energy sources: currently, 84% of the data centers' energy consumption is compensated by renewable energy certificates compared to 75% in 2018. The goal is to have 100% of our data center power energy compensated using renewable energy sources or certificates in the near future.

Electricity consumption in Data Centers



¹ Regarding the calculation method of CO₂ emissions, for data centers totally powered with renewable energy, the emission factor is considered to be zero, for the other data centers the local factor is used (for more details, see methodological note chapter 6 - CSR indicators).

² Before 2018, the local country factor given by the ADEME was used. Since 2018, as more precise data is available on the percentage of renewable energy, the rate considered is the one claimed by the subcontractor.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

ENERGY CONSUMPTION

Environmental impact of Criteo's offices

At Criteo, people are concerned about climate change. Reducing greenhouse gases and, first and foremost, being able to understand its emission level is an objective for Criteo.

Reduce energy consumption

While Criteo does not own the buildings that it occupies, there is a company-wide commitment to limiting energy consumption. As a result, energy-saving initiatives are crafted and implemented independently in each office. Criteo has undertaken numerous actions aimed at reducing energy consumption at both its offices and data centers.

In France, Amsterdam, Singapore and Tokyo offices, **lighting is automatically switched off at night**. Similarly, in a few offices, including the London and Singapore office, lighting is motion sensor activated. Highly energy-efficient LED lighting is installed across many locations where feasible. The default settings for all laptops are also configured to reduce energy consumption from employees' IT equipment, by going into sleeping mode when the laptop is not used and into battery mode (lower energy consumption) when it is not plugged.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

ENERGY CONSUMPTION

Environmental impact of Criteo's offices

Air conditioning is also a source of energy consumption that Criteo aims to monitor and control. For example, the air-conditioning system is automatically shut off during the evening directly after normal working hours in the London, Singapore and Japan offices, and is significantly reduced in the Paris office.

Heating, ventilation and air conditioning in such major offices in the Americas and APAC as New York and Tokyo are set to run between reasonable working hours with adequately preset temperature.

In the Milan office, electricity is 100% provided by Lifegate, a green energy supplier, which also plants trees to compensate for energy transportation pollution.

Due to the complexity of obtaining data for small offices, actual electricity consumption has been collected only for offices with more than 50 employees. For other offices, accounting for 4% of electricity consumption, data is estimated based on a ratio per employee.

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

Electricity consumption in offices

2018¹

2019

Total office electricity consumption

5,740 MWh

↓ 1.6%

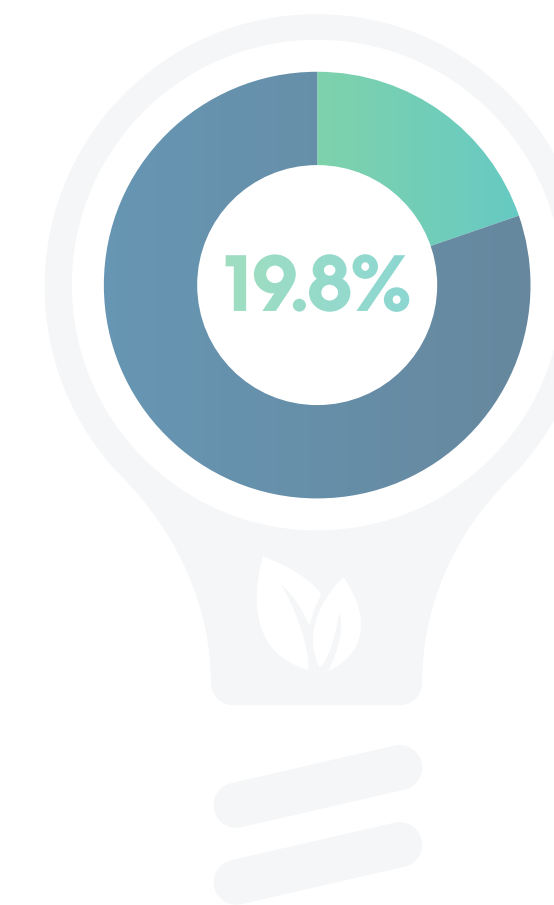
5,650 MWh

Total per employee

2.28 MWh

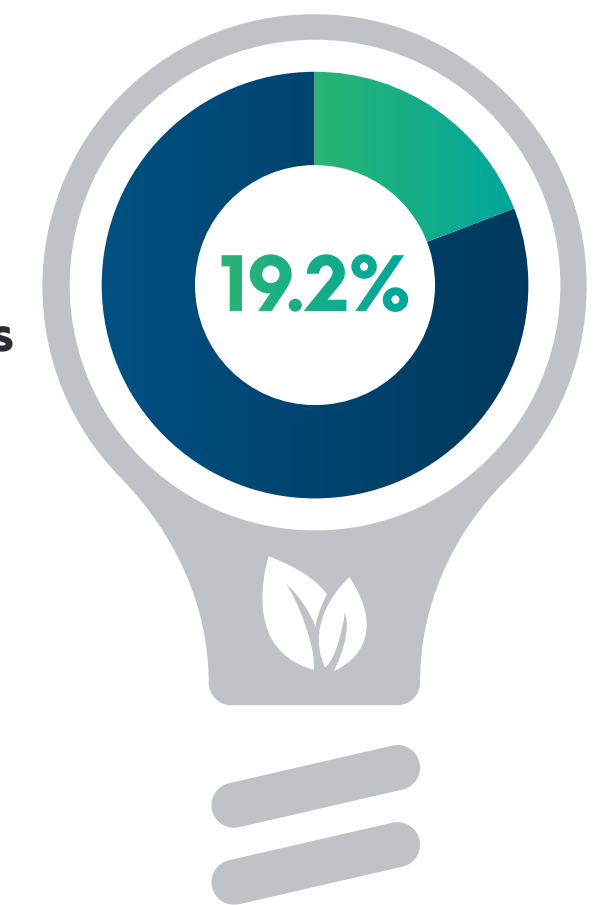
↓ 2.2%

2.23 MWh



% from
renewable
energy sources

↓ 3.2%



¹ 2018 data was updated for those indicators compared to figures disclosed last year in the 2018 CSR report.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Carbon footprint

The most significant greenhouse gas emissions come from the electricity consumed in data centers (figure published above), offices and during business trips¹.

In order to implement reasonable company-wide actions, Criteo is now aware of which emission sources the company can directly control, such as electricity use, and which sources the company can still influence through good practice and policies such as business trips.

Criteo tries to limit emissions by avoiding flights whenever possible, attending video conferences instead of physical meetings, and not offering company cars in employees' compensation packages. Working from home is also allowed in several Criteo's offices, either in accordance with local regulations and policies or depending on practices in the country for our sector of activity. For instance, in our Paris office, a teleworking agreement was signed in 2019 allowing employees to work from home one day per week.

Criteo is also looking at ways to minimize the use of individually owned private cars. Many of Criteo's offices are located in areas easily accessible by public transportation and do not have a parking lot, therefore discouraging employees from commuting with their private cars. In many of Criteo's offices, public transportation is subsidized to promote public transportation usage.

¹ According to the greenhouse gas protocol methodology, Criteo can classify its greenhouse gas emissions associated with electricity consumption and business trips respectively to scope 2 and scope 3.

CO₂ emissions

2018¹

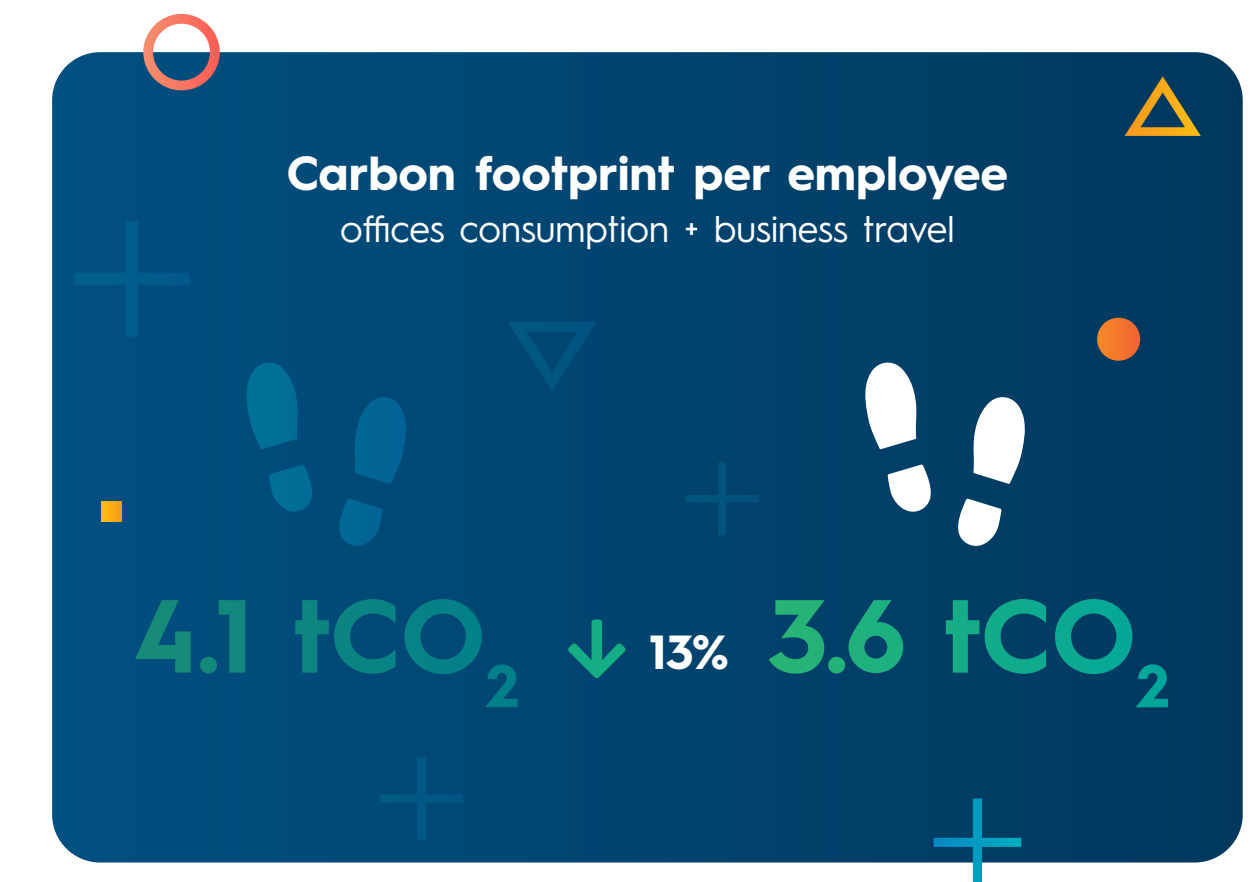
2019

From electricity consumption

1,329 tCO₂ ↓ 3% 1,287 tCO₂

From business trips

8,921 tCO₂ ↓ 13% 7,741 tCO₂



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Carbon footprint

The -13% decrease of air travel carbon footprint is driven by a decrease of business trips during the year, combined with a collective company effort to:

-  **Travel only for a justified business purpose**
-  **Require support from local Criteo staff rather than traveling whenever possible**
-  **Use video conference whenever possible**
-  **optimize the number of trips.**

Employees have been made aware of these matters.

In addition to the concern about carbon emissions produced by electricity consumption and air travel, Criteo is also working on a way to monitor or estimate the emissions generated by leakages from refrigerant systems in data centers for upcoming years.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Sustainable offices

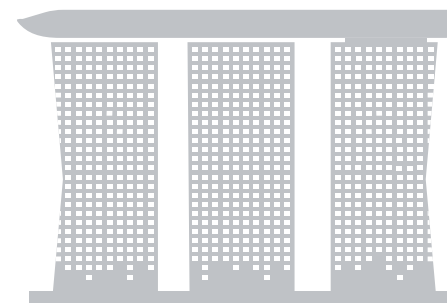
Although Criteo does not have a procurement policy regarding sustainable buildings, the company always selects environmentally-friendly offices.

Many of our offices were built according to high environmental quality norms for building, for example:



Paris

The building housing Criteo's headquarters is NF HQE¹ certified.



Singapore

The office is located in a building that has been awarded the prestigious Green Mark Platinum Award.



**Miami, Barcelona,
Stockholm**

The offices are located in a LEED² Gold building property while the Boston office is part of a LEED Platinum building.

HOLLYWOOD

Los Angeles

The building was honored by Culver City's City Council and local utility representatives as a Sustainable Business-Innovator.



London

The office is located in a BREEAM³ certified building.


61%

of our offices is covered by a green certification based on offices areas in m²

¹ NF HQE: Norme Française "Haute Qualité Environnementale" ² LEED: Leadership in Energy and Environmental Design ³ BREEAM: Building Research Establishment Environmental Assessment Method

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Green initiatives

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

For example, new employee training covers topics on printing best practices such as print on both sides in black & white, and various local initiatives such as clothes recycling and tree planting. To raise and maintain employees' awareness Criteo has launched internal communication campaigns mostly on a local or regional basis.



In 2018, "Criteo Eco" was launched to prioritize a positive environmental impact in Criteo's operations and culture.

The goal was to encourage environmentally-friendly behavior in operations and decision making as well as in communication campaigns.

The first global campaign was launched in 2018 in the Americas on the theme of Zero-Waste.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Circular economy

One of the main CSR ambitions at Criteo is the ability to measure its recycling effort, control the waste production of its activities, use alternative methods for waste collection and sorting, such as keeping waste out of landfills, and move towards a zero-waste business. The company intends to track its recycling rate in the coming years, for both e-waste and office waste.

E-waste

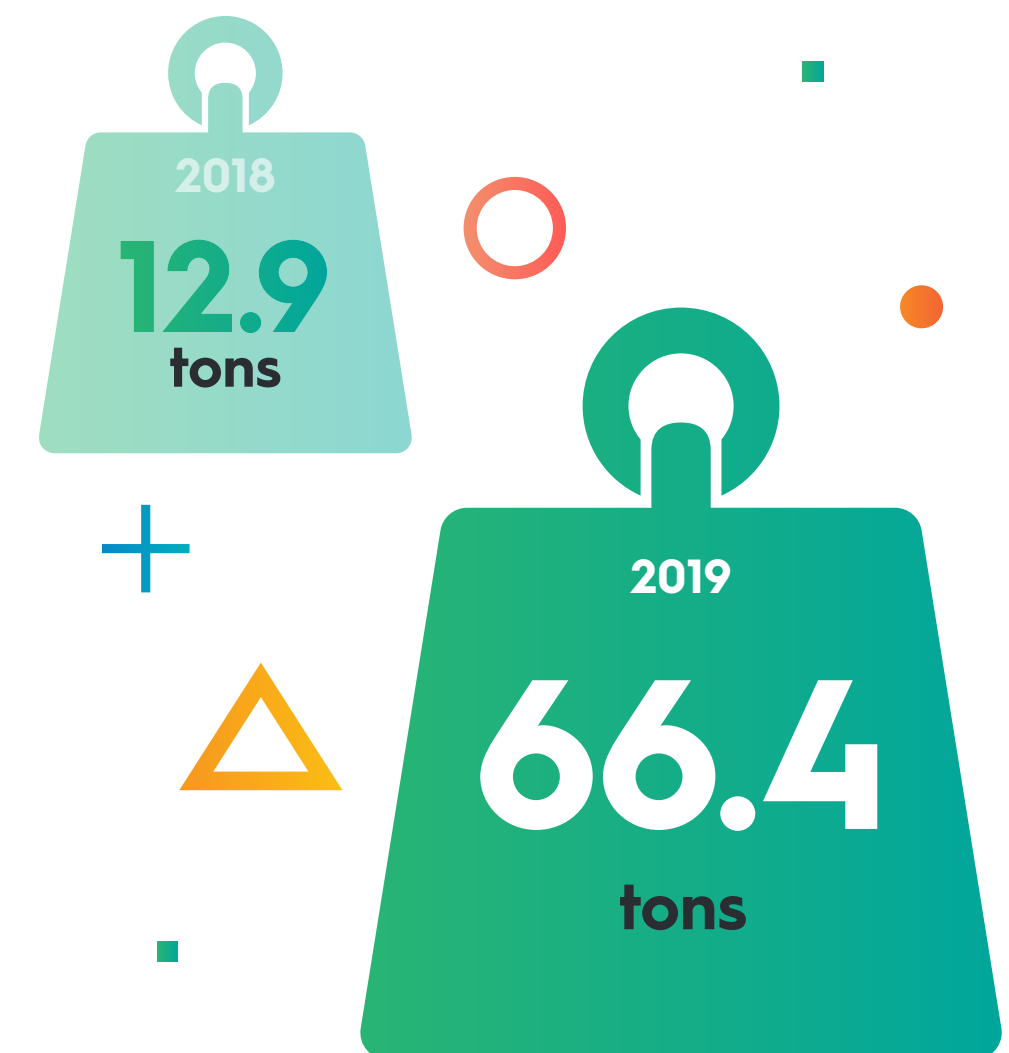
Since 2016, in order to reduce the amount of e-waste generated in the data centers, Criteo asked for a guarantee extension for the servers from three to five years.

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

In 2019, Criteo decommissioned four rooms in two data centers, as servers in those rooms had reached the end of their lifecycle. A significant part of it was recycled by our provider. Those operations also ensure that old generation servers are replaced regularly by more efficient ones, with better performance and lower energy consumption.

Other e-waste from the workplace, such as employees' phones, is not discarded at end-of-life but given back to a reseller. For instance, in 2019, the Paris office was refurbished requiring to renew all IT equipment in the meeting rooms, all of which was also sold to a reseller.

Total e-waste produced



¹ Electronic waste, or commonly called "e-waste", describes discarded electrical components or electronic devices.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Circular economy

Office waste

All of Criteo's offices sort and recycle waste whenever possible.

Criteo has equipped most offices with waste recycling bins, and some even have battery recycling containers, as in the London offices. In addition, clear signs about waste classification procedures are on display in most of Criteo's offices to ensure employee compliance. To limit waste, employees are encouraged to use mugs instead of disposable cups in several offices.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Circular economy

Criteo Eco's "Zero Waste" campaign

In 2019, the campaign of the Criteo Eco global initiative launched in 2018 on the theme of "Zero Waste" was continued in the Americas. It is widely regarded as an employee-engagement vehicle involving key operational changes, as well as awareness communications campaigns in all our Americas offices for Phase 1.

After the audits of waste streams performed in 2018, the actions implemented at the beginning of the "Zero Waste" initiative have been further developed in 2019. Individual, non-sorted waste bins are now largely eliminated from employee desks in all our Americas offices while recycling bins were installed in all locations, and signage was introduced to ensure that employees were supported in making the correct decision when disposing of waste and recyclables. Composting solutions are available where buildings allow it: in the West Coast sites, in Ann Arbor through coordination with the City, and in the New York office in collaboration with the building owner.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

criteol.

CARBON FOOTPRINT

Circular economy

The Criteo Zero Waste Campaign took the Zero Waste International Alliance (zwia.org) framework as a reference point for incentivizing landfill diversion in an effort to create a campaign that is broadly relevant across regions.

The in-house team adapted a pyramidal hierarchy (similar to the zwia pyramid) whose stages include:

Refuse

Reduce

Reuse

Recycle

Rot

During the campaign, disposable drinking containers, straws, cutlery and other food utensils were greatly eliminated across the region. In addition, Criteo continues to work with external caterers and providers to minimize disposables and excess packaging as well as food waste in their offerings. Lunch totes are offered to employees to avoid the use of plastic bags. Signage introduced in restrooms encourages employees to use a single paper towel at most to dry hands when air dryers are not available.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Circular economy

In addition to day-to-day operational modifications, the campaign emphasizes ongoing best practices to discourage employees from accepting disposable cups, plastic bags and excess food packaging as a part of their habitual behavior in the office. The objective is to create an office ecosystem entirely free from some of these “main offender” materials by raising awareness amongst employees and supporting their daily preference for reusable and washable items above single-use plastic cups, containers, packaging and bags. As part of this effort, branded reusable bottles, mugs, porcelain plates are our first choice in many offices and where that’s not possible, compostable/biodegradable ones are mostly used. **Boston implemented a sparkling soda machine that has reduced our single-use plastic consumption by over 300,000 bottles a year.**

Criteo is planning to extend this campaign to EMEA and APAC offices in future years, but local teams are already working on solutions to reduce and recycle waste. For instance, in the Seoul office, all individual trash bins were removed from desks so that employees will dispose of waste in the designated recycling bins, and food waste is being processed through a compost bin installed in the kitchen.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Circular economy

Resource consumption

Due to its office activity, Criteo's main resources are paper, water and office equipment.

The nature of Criteo's business allows employees to promote a paperless work environment and if printing is necessary, employees are advised to reuse one-sided printed paper or print double-sided when possible.

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



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Energy consumption

Carbon footprint

Responsible sourcing

Diversity

CARBON FOOTPRINT

Managing climate risks

While tech companies may not be exposed to critical climate risks, we are aware of our need to address the consequences of climate change in future years.

Issues such as an increase in energy prices or a rise in extreme weather events which may affect data centers or our suppliers' activities could, for instance, have a direct impact on our processes. From a business perspective, consumers' behaviors are evolving toward more environmentally conscious habits, just as regulatory pressure to promote responsible consumption is starting to strengthen. Those trends could prefigure major changes in some of our markets, generating risks indeed but also presenting us with key business opportunities. Lastly, as our talents become increasingly aware of climate issues, Criteo must do its part to contribute to the global effort in reducing carbon emissions.

By strengthening our CSR approach and diffusing it across all our operations, we aim to improve our understanding of the challenges that climate change will hold for Criteo, and design suitable solutions to manage them.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Supply chain

Diversity

SUPPLY CHAIN

Subcontractors & 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 of these new processes include Corporate Social Responsibility criteria.

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

“

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

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

”

SUPPLY CHAIN

Subcontractors & suppliers

When evaluating bidders' responses to tenders or RFP, Criteo applies its own confidential criteria and weighting. The policy evaluation criteria is 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 & responsiveness

Quality product/service offering

Overall supplier quality

Range of services offered

Proposed method of operation (ordering, delivery, invoicing)

Availability & relevance of reports

Availability & quality of references & relevant experience

Financial stability

Pricing structure & controls offered

Ability to interface with existing infrastructure

Options/Costing in respect of charges & delivery

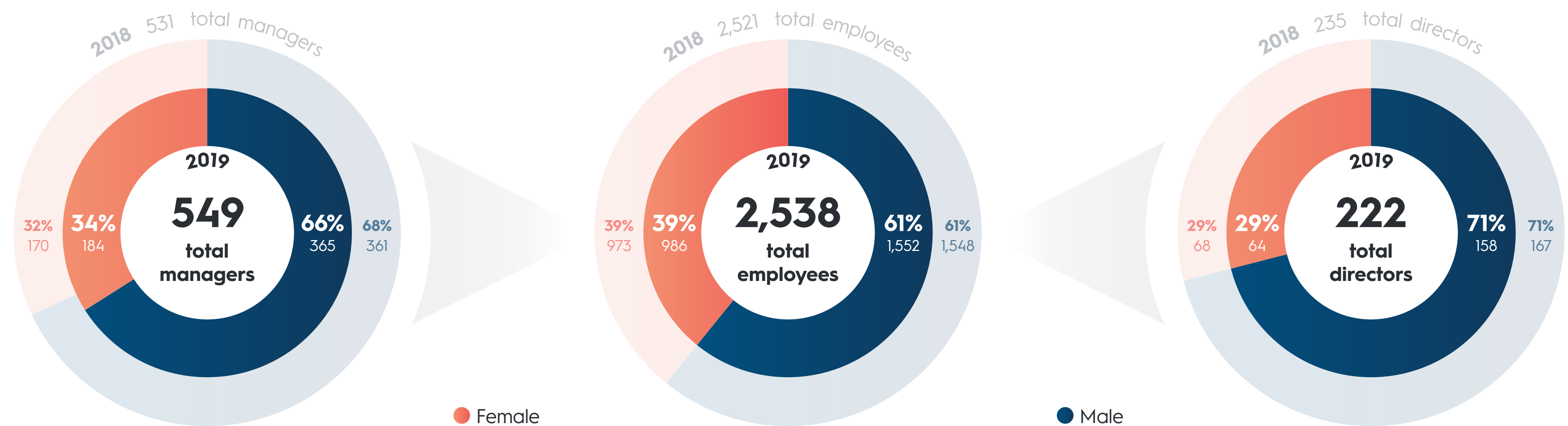
As already mentioned in the report, Criteo's commitment to Health, Safety and the Environment is also made clear in the specific questions asked during the tender process for data center space rentals. In particular, the company expects potential suppliers to provide clear responses on their use of renewable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

GENDER EQUALITY

Diversity & equal opportunities

Measures implemented to promote gender equality

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



Criteo aims to hire talent without gender discrimination and promote fair opportunity regardless of gender. **In 2019, 39% of employees promoted were women**, in line with the share of women employees in the company.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

GENDER EQUALITY

Diversity & equal opportunities

Diversity and Inclusion initiatives

At a global level, Criteo is leading several Diversity & Inclusion (D&I) key actions.

The company developed a specific Diversity & Inclusion training program to raise awareness against unconscious bias during the recruitment processes. As a first step, this training was deployed for all Criteo's employees who belong to the People Leadership team, before being extended to all R&D managers and recruiters as diversity and inclusion is an R&D priority (see below).

Criteo also started to develop a Diversity & Inclusion network, where female employees are given opportunities to connect together, hold events, etc. For instance, in 2019 the company organized two speed-mentoring sessions in France, aimed at empowering women and encouraging them to pursue their careers in the tech sector. The women employees who participated could have a one-and-one discussion with a senior leader to talk about their future at Criteo.

Current initiatives are focused on changing the mindset of Criteo's community. In future years, the company intends to set targets in terms of diversity recruitment, promotions, and training.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

GENDER EQUALITY

Diversity & equal opportunities

The R&D Diversity & Inclusion roadmap

Criteo's R&D department, accounting for nearly 600 employees in France and the United States, identified gender equality as a priority issue in terms of talent acquisition and people management. For this reason, the department developed its own Diversity & Inclusion roadmap to complement Criteo's global actions. In 2019, this roadmap included the following key actions:



The R&D team is reviewing its recruitment process for it to better adapt it to women.

They notably started revising the wording of job descriptions to make them more inclusive and appeal more equally to female candidates. In future years, the team intends to implement a new process to collect feedback from interviewees and thus continue improving recruitment processes in line with candidates' expectations.

All R&D managers and recruiters attended the Diversity & Inclusion training program focused on unconscious bias that was first designed for Criteo's People Leadership team.

This training program was delivered for 24 managers and recruiters over four sessions in October and December 2019, representing 168 hours of training, and Criteo wants to extend it next to all R&D Hiring managers and Recruiters.

Finally, the R&D team organized specific events to encourage women to engage with senior employees and tech leaders, such as networking sessions with external speakers "Criteo Talks D&I" or the "aujourd'hui je code" initiative.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

GENDER EQUALITY

Diversity & equal opportunities

Raising awareness in the Tech sector

To promote gender equality and support women in the Digital/Tech/Science field, Criteo regularly organizes initiatives to raise awareness both internally and externally, wishing to build a worldwide community of R&D Tech women engineers.

In 2017, Criteo launched Women in Engineering (WIE), a group which is open to everyone at Criteo, male or female, that aims to achieve more gender diversity in the company, to improve and increase retention, to develop and hire women in computing jobs such as Technical Solutions, Analytics, R&D, Internal IT and Product.

Several events were conducted again in 2019 following-up on 2018 actions to promote this group and its mission:

"Aujourd'hui je code": in June and November 2019, we welcomed 90 high school students, mainly girls, to share the Computer Science culture and to show them that a career in this field is accessible. The days were organized around workshops led by our R&D teams.

"Grace Hopper Celebration Conference": for the second year in 2019, Criteo sponsored and participated in this event. It enabled us to be part of a major movement dedicated to women in the Technology industry, to share knowledge, expand our network and recruit new talents, as well as, giving more visibility to our WIE group.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

GENDER EQUALITY

Diversity & equal opportunities

In 2019, an open diversity and inclusion meet-up called “Criteo talks D&I” was organized in Europe for the first time. The event was targeted for internal People Department & HR teams, but also open to external guests. Several speakers were invited, such as Caroline Ramade from 50intech, a member of the Board of the UN Women. The purpose of this first edition of “Criteo talks D&I” was to raise awareness within the leadership regarding these topics.

Moreover, Criteo still supports the Women in Machine Learning & Data Science (WIMLDS) initiative. The members of this community are dedicated to the support and promotion of women practicing, studying or interested in the fields of machine learning and data science. In 2019, Criteo hosted two events for this group in Paris and Ann Arbor.

In September 2014, Criteo signed a gender equality agreement for a three-year term to affirm its commitments on the matter in France. This agreement, which was renewed in February 2018 for another three years, aims to build awareness around gender equality matters and is a warranty of compliance with the principle of non-discrimination.

It promotes equal pay, equal access to training and equal opportunities for career development and promotions. It also encourages diversity in recruitment processes. Certain measures have been put in place by Criteo in order to achieve these goals, such as prohibiting unjustified pay differentials, increasing the number of promotions granted to women to 30% of the total amount of promotions awarded by the company and increasing the proportion of women in all the different types of positions and pay ranges to at least 29% the first year, 31% the second year and 33% the third year.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

GENDER EQUALITY

Diversity & equal opportunities

Beyond gender equality, Criteo's R&D team is also diversifying the pool of schools approached with the Campus Program to increase focus on universities and schools that have a higher percentage of socially and ethnically diverse students.

Finally, in France, the company is taking initiatives to increase its social diversity by mentoring students coming from underprivileged neighborhoods through partnerships with associations.



Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

DIVERSITY & EQUALITY

Diversity & equal opportunities

At Criteo, employees are strong believers in promoting diversity and equal opportunities.

Non-discrimination and prevention of harassment

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

Providing an inclusive work environment

Consequently, Criteo applies its equal opportunity policy (also called non-discrimination policy) which strictly forbids all forms of discrimination, whether at the recruitment stage or afterwards with regard to promotions, salary increases and benefits, and specifies that no employee may be discriminated against on the basis of gender, race, ethnicity, religious belief, disability, national origin, veteran status, marital status, or sexual orientation.

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

 **86**
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.

83%
employees
under 40yrs

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

Employees above 40 years old¹

2019

Share of employees - Hires

8%

Share of employees - Promotions

9%

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

¹ New information in 2019, not available for 2018.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

DIVERSITY & EQUALITY

Diversity & equal opportunities

Taking action against discrimination and harassment

Over the course of 2019, Criteo delivered improved training for all our managers and interviewers offering online training to ensure all locations could participate. Training on the awareness of unconscious bias is included as part of the curriculum.

Intent on continuously improving our action against discrimination and harassment, Criteo has also launched this year a preventive training program against harassment. This program has been adapted to specific cultures, situations and risk areas identified in the countries where Criteo's offices are located. It was rolled out to the majority of Criteo's employees with the final groups to follow in 2020. Always seeking to provide an open, equal and fair assessment, Criteo will continue to refine this training in future years.

To address harassment and discrimination issues at the recruitment stage and afterwards, Criteo:

- Provides training and education to make sure everyone knows their rights and responsibilities - every newcomer is required to complete an e-learning module devoted to this topic.
- Ensures an effective and fair hiring process.
- Promotes appropriate standards of conduct at all times.
- Provides means for employees to report potential violations in relation with the Code of Business Conduct and Ethics.

Talent acquisition,
development &
well-being

Relation with clients &
responsible practices

Environmental impact

Responsible sourcing

Diversity

Gender equality

Diversity & equality

DIVERSITY & EQUALITY

Diversity & equal opportunities

Alert mechanisms

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

When appropriate, Criteo encourages employees to talk with their direct managers first, as they will often be able to resolve issues quickly. Alternatively, they can also raise these issues to their Human Resources representative, a member of senior management, the General Counsel or the Senior Compliance Officer. If for any reason, an employee does not want to raise his/her concerns through one of these channels, he/she may utilize the Criteo Whistleblowing Hotline, a confidential, 24/7 service managed by a third-party service provider, or send a confidential email to a defined email address or choose to submit a secure Whistleblowing form. The report will be sent directly to the Chairman of the Board's Audit Committee, an independent director of the company who is neither an employee nor a manager. All reports are kept confidential as permitted under applicable law.

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

Furthermore, a new "Case Management Tool" named i-Sight was set up in 2019 to support the process of conducting formal investigations and/or handle formal people-related processes in case a situation is reported. This tool was put in place to improve Criteo's ability to conduct investigations objectively and fairly and to archive accurate records for future reference if required. Those records are handled in line with local legislation.

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.

Reporting period and scope

All information collected and highlighted in the CSR report covers the period from January 1, 2019 to December 31, 2019.

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

Therefore, to ensure reliable quantitative data and boost continuous improvement, the Criteo CSR reporting scope for 2019 considers the major global legal entities with more than 50 employees at the end of 2019. For electricity consumption, only offices with more than 50 employees are taken into account, due to the information being complex to obtain for smaller offices.

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

Thus, for the financial year 2019, the reporting scope on quantitative data covers the following legal entities and offices, which represent 91% of the overall Criteo’s workforce for social information and environmental information:

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

Legend: In bold, offices with more than 50 employees that collect actual data for electricity consumption. For other offices, electricity consumption and CO2 emissions due to electricity consumption are estimated based on a yearly ratio per person. Those offices account for 4% of office electricity consumption and 4% of emissions due to office electricity consumption.

Methodological note

Relevance of CSR indicators

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

- **A benchmark on CSR best practice among IT sector leaders**
- **Workforce-related, environmental and social impacts and risks analysis of Criteo's activity**
- **Global Reporting Initiative (GRI) G4 guidelines**
- **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 proof-readers, taking into account new focus areas in the report and expectations from stakeholders.

Internal & external controls

Data collected during the CSR reporting process is controlled by "validation managers". For each KPI, a dedicated person is in charge of 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. 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.

Methodological note

CSR indicators – Calculation and estimation methods

Headcount:

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

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

Training:

Training hours of employees who left the company during the reporting period are included in the calculation of training hours. Training hours of sub-contractors or consultants who have been trained by Criteo are not included in the calculation of training hours.

Methodological note

Face-to-face training hours

Are considered:

- The number of training hours that employees attended (not the number of training hours that employees registered for) and which were reported by Human Resources business partners to the Global Learning & Management Development team
- Individual coaching or state of the art co-development sessions
- Management and leadership development modalities

Are excluded:

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

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

E-learning training hours

Are considered:

- Only theoretical hours, not the actual “on-line connection time”
- Training content completed up to a certain point, with minimal (and if relevant maximal) duration thresholds set up depending on the type of course provided

Are excluded

- Time logged in The Learning Zone
- 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

Methodological note

Business trips

Data from the business travel agency, EGENCIA, includes all Air Travel Scope except Korea, Japan, Brazil and Russia. Train trips are not included. Hence, the business trips considered in the CO₂ emission calculation represent more than 90% of the travel spend.

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 need is negligible.

Amount of renewable energy consumed for data centers

The rate used is the Renewable Energy rate claimed by the owner of the data center.

Amount of renewable energy consumed for offices

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

CO₂ emissions from electricity consumption of offices

Emission coefficients per country from ADEME 2019 database have been used for the calculation.

CO₂ emissions from electricity consumption of data centers

For data center with a 100% rate of renewable energy, the emission coefficient is considered equal to 0. For the other data centers, emission coefficients per country from ADEME 2019 database have been used for the calculation, except for Hong Kong where a rate of $0.51 \cdot 10^{-3}$ teqCO₂ has been used from CLP database (local electricity supplier).

Methodological note

Other information

Given the nature of its activity and business, Criteo does not produce any matter that may severely and directly affect the environment or violate Human Rights.

Consequently, this report does not contain disclosures on the following information mentioned under article R. 225-102-1 of the French Commercial Code:

- **“Human rights”**
- **“Adaptation to climate change”**
- **“Food waste”**
- **“Food insecurity”**
- **“Animal wellbeing”**
- **“Responsible food choices”**

The logo for Criteo, featuring the word "criteo" in a lowercase, sans-serif font, followed by a stylized "L" shape that forms a square with a dot above it, and a period at the end. The logo is white and centered on an orange background.

criteoL.