



**MODERN SLAVERY
STATEMENT
2024**



I MODERN SLAVERY STATEMENT

This modern slavery statement ("**Statement**") is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Criteo S.A. and its subsidiaries ("**Criteo**") have taken and are continuing to take to ensure that Modern Slavery is not taking place within our business or supply chain.

Modern Slavery means:

- human trafficking;
- forced work;
- mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse;
- being dehumanized, treated as a commodity, being bought, or sold as property; and
- being physically constrained or to have restriction placed on freedom of movement.

Criteo has a zero tolerance approach to any form of Modern Slavery and is committed to acting ethically, with integrity, and transparently in all business dealings. We also are dedicated to putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within the business or our supply chain.

II BUSINESS ACTIVITIES

Criteo is a global technology company powering the world's marketers with trusted and impactful advertising. It operates at the intersection of ecommerce, digital marketing and media monetization, enabling brands' and retailers' growth by providing best-in-class marketing and monetization services on the open Internet. Criteo does this by activating commerce data through artificial intelligence ("AI") technology, reaching consumers on an extensive scale across all stages of the consumer journey, and generating advertising revenues from consumer brands for large retailers.

Headquartered in Paris, France, Criteo employs 3,563 employees worldwide as of December 31, 2023 and is currently established in Armenia, Australia, Brazil, Canada, China, Cyprus, France, Germany, India, Israel, Italy, Japan, Russia, Singapore, South Korea, Spain, Sweden, the Netherlands, Turkey, United Arab Emirates, United Kingdom and the United States.

III RESPONSIBILITIES

Criteo confirms the absence of any Modern Slavery in its supply chain or in any part of its business, to its knowledge. Criteo understands that this requires an ongoing review of both its internal practices in relation to its employees and its supply chains.

Criteo does not enter into business with any organization, which knowingly supports or is found to involve itself in slavery, servitude, and forced or compulsory labour. Additionally, Criteo strictly adheres to the required standards under the relevant employment legislation in all the jurisdictions where Criteo operates, and in many cases exceeds those required standards in relation to its employees.

IV RISK ASSESSMENT AND DUE DILIGENCES

Criteo's latest Enterprise Risk Mapping exercise did not highlight specific risk connected to Modern Slavery considering Criteo's activities.

However, to ensure that no Modern Slavery is taking place within the Criteo's business or supply chain, Criteo commits to:

- ensure that all of its employees are legally employed;
- ensure all employees are paid the minimum wage and have the right to work;
- ensure working conditions are safe and hygienic;
- ensure working hours are not excessive;
- request to certain of our vendors that their sub-contractors are similarly compliant with their employees;
- use our procurement team to strengthen supplier engagement and maintain effective links with them, to ensure compliance with the UK Modern slavery Act 2015 and any relevant industry and international standards;
- share knowledge and improve understanding among our workforce; and
- publish this Statement on Criteo's website for public access.

Finally, Criteo has received an Ecovadis scorecard which amongst other things carries out an audit to assess supplier's corporate social responsibility standards including health and safety, environment, ethics. Criteo received the silver medal in 2024.¹

V OUR COMMITMENT

Criteo operates a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. This Statement supports Criteo's recruitment, sustainable procurement, grievance, equal opportunities, anti-bribery, human rights and whistleblowing policies and procedures, including conducting eligibility to work checks for all employees to safeguard against modern slavery or individuals forced to work against their will.

Criteo's Code of Business Conduct and Ethics (the "**Code**") and Third Party Code of Conduct (together, the "**Codes**") make clear that we are committed to ensuring there is no form of unethical conduct in our supply chain or in any part of our business. The above mentioned Codes instruct employees and third parties to immediately report any concerns about any issue or suspicion of wrongdoing to their supervisor. All Criteo's employees are responsible for complying with the Code, policies and procedures. Violation is subject to discipline, up to and including termination. They are also requested to complete a mandatory e-learning focusing on Code's key messages.

As part of the Third Party Code of Conduct which is publicly available on Criteo's [IR website](#), Criteo expects its vendors to confirm that no part of their business operations contradicts with this Statement and, specifically to attest the following:

- they have taken steps to eradicate Modern Slavery within their business;
- they hold their own vendors to account over modern slavery;
- they pay their employees at least the national minimum wage; and
- they pay their employees any prevailing minimum wage applicable within their country of operations.

¹ <https://ecovadis.com/solutions/ratings/>



Criteo encourages its employees, suppliers, subcontractors, and other third-party business partners to ask questions about the Codes and to report any issues, concerns, or suspicions of unethical conduct or violation of laws and regulations.

In accordance with Criteo’s Whistleblowing Procedure, these reports can be made through our Whistleblower Hotline at speakup@criteo.com or +1 866 865 9476, or via secure online form at <https://www.openboard.info/CRTO/index.cfm>. No reprisal or retaliatory action will be taken against any individual for raising concerns in good faith under the process laid out in the Whistleblowing Procedure. Criteo will investigate, address and respond the concerns and will take appropriate corrective action. The Whistleblowing channels can also be found on Criteo’s intranet, or on the investor relations website.

VI OUR PERFORMANCE INDICATORS

Criteo will know the effectiveness of the steps taken to ensure that Modern Slavery is not taking place within its business or supply chain with the absence of reports from employees, the public, or law enforcement agencies indicating that Modern Slavery practices have been identified.

VII APPROVAL

This Statement was acknowledged by the Board of Directors of Criteo S.A. on April 25th, 2024, and by the Board of Director of Criteo Ltd. on May 17th, 2024.

For and on behalf of Criteo S.A.:

For and on behalf of Criteo Ltd.:

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Megan Clarken
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Megan Clarken

Ryan Damon

CEO

Director

May 17th, 2024

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