Sustainability at Criteo in 2024

APRIL 2025

Criteo's Corporate Social Responsibility
Approach Overview

CRITEO
Sustainability
ENVIRONMENTAL • SOCIAL • GOVERNANCE
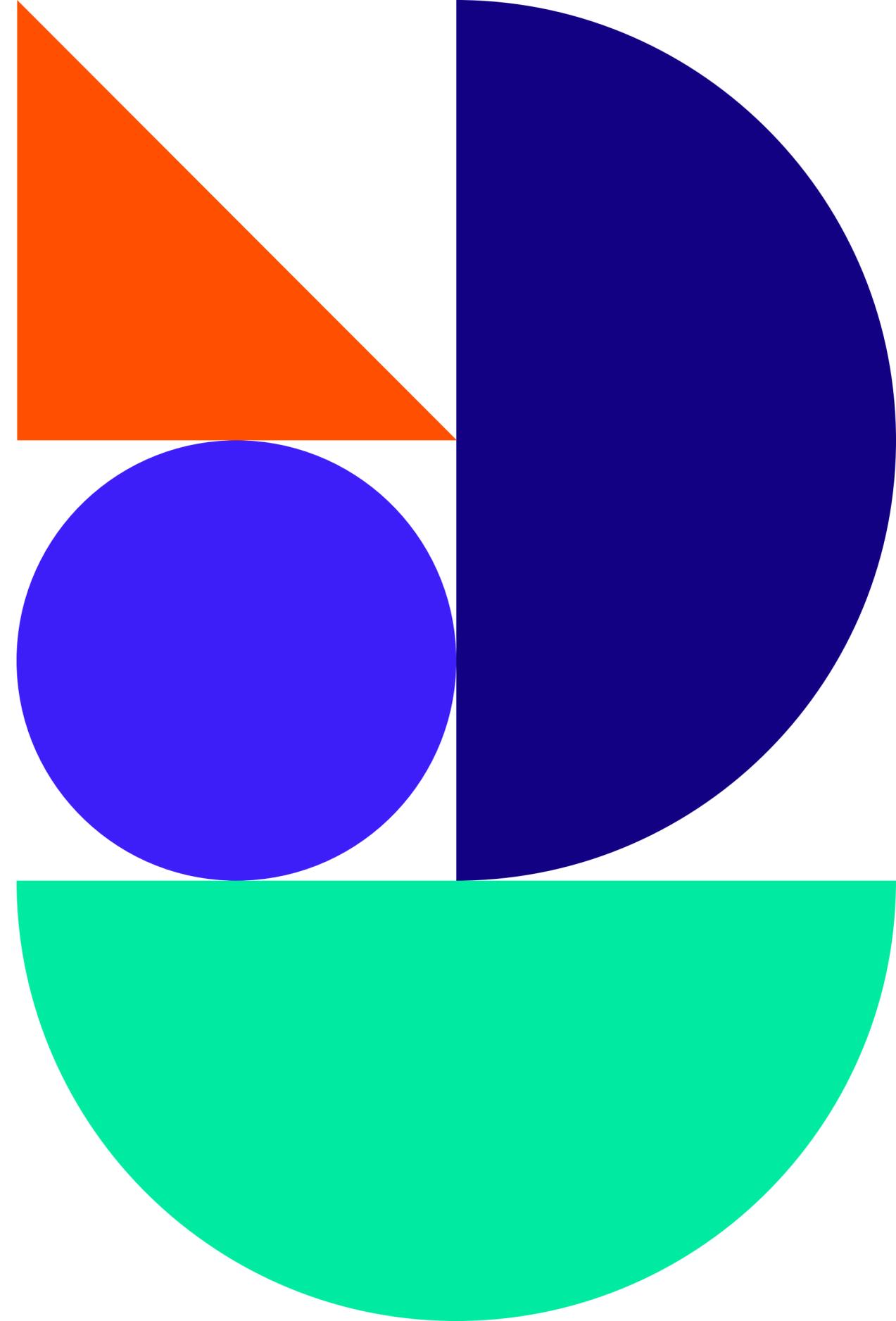
Message from the Chairwoman of the Board

The driving force that unites Criteo employees is our mission to bring richer experiences to every consumer by empowering the world's marketers and media owners with trusted and impactful advertising. This mission not only guides the way we do business with our clients, but also the way we consider the world around us—and our Corporate Social Responsibility ("CSR") report reflects our commitment to improving advertising for the greater good.

In 2024, we released our first-ever Global Environmental Policy, outlining our commitment to environmental stewardship, and we became the first company in our industry to have our carbon emissions reduction targets approved by the Science Based Target Initiative ("SBTi").

An extended group of Senior Leaders (including the Leadership Team) took part in an immersive workshop on climate strategy, aimed at empowering them to champion environmental sustainability. This initiative framed sustainability as both a corporate responsibility and a business opportunity, equipping leaders to proactively incorporate it into their strategic decision-making and daily operations.

These initiatives were overseen by our Global Sustainability Committee who ensure that sustainability is prioritized with the highest levels of governance and accountability.

We adopted the Task Force on Climate-Related Financial Disclosures ("TCFD") framework to provide clear and detailed information about our approach to managing climate-related risks and opportunities. Additionally, we participated in the CDP Climate Change Questionnaire, as part of our dedication to transparent decision-making and accountability in addressing climate change.

Our people remain at the core of the company, with their well-being and development being our top priority. We developed and implemented a robust Health, Safety, Environmental, and Physical Security ("HSEPS") Management System, aligned with internationally recognized ISO standards, to ensure a consistent approach across all our operations worldwide. Together, we are committed to safeguarding our people, enhancing our operations, and making a positive contribution to the communities and environments where we operate.

While volunteering has long been part of Criteo's culture, the formal launch of the Criteo Giving Committee this year marked a significant step in scaling and structuring our efforts. Supported by regional leaders and champions, this global framework has enabled us to drive meaningful initiatives across EMEA, Americas and APAC, uniting employees around key causes such as environmental sustainability, education, and food security. By introducing region-specific leaders, we have further enhanced our

ability to adapt to local needs while maintaining a cohesive and impactful global approach.

In 2024, we garnered many achievements that highlight Criteo's dedication to fostering diversity, equity and inclusion, namely the Gold Medal for Diversity and Inclusion Employer of the Year, Diversity and Inclusion Employer of the Year at the Women in Tech Global Awards 2024 and the Global Diversity, Equity and Inclusion Commitment Award at Ragan's CSR & Diversity Awards 2024.

We're incredibly proud of the strides we've made again this year to position Criteo as a sustainable leader in the AdTech industry, and we're excited for Criteo to continue these efforts under the leadership of our new CEO, Michael Komasinski. We're ready to propel ourselves into 2025 with a strong focus on doing the right thing to make a positive impact for our organization, society and the planet.

RACHEL PICARD

[1] Carbon Disclosure Project, an international non-profit organization that helps companies, cities, states, regions and public authorities disclose their environmental impact.

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Contents

CRITEO

Culture and Values

About Criteo

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

Criteo is the global Commerce Media company that enables marketers and media owners to drive better commerce outcomes. We leverage commerce data and artificial intelligence ("AI") to connect e-commerce, digital marketing and media monetization to reach consumers throughout their shopping journey.

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

We enable brands', retailers' and media owners' growth by providing best-in-class marketing and monetization services and infrastructure on the open Internet, driving approximately **$31 billion** of commerce outcomes for our customers – in the form of product sales for retailers, brands and marketers and advertising revenues for media owners. During 2024, we operated in **108** countries.

Culture and Values

At Criteo, we believe both great people and innovative product solutions are the foundation of limitless possibilities.

Criteo's values, **"Open, Together, Impactful"**, shape our culture[2] as the Company continues to evolve:

OPEN.

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

TOGETHER.

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

IMPACTFUL.

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

Culture and Values

The Criteo Commerce Media Platform

Since 2018, and accelerating since 2020, Criteo has deeply transformed itself and is now a multi-solution Commerce Media Platform provider.

The Criteo Commerce Media Platform is the only unified platform that directly connects advertisers with retailers and publishers on the open internet. We offer marketer and media owner clients a single platform for first-party data-based marketing and monetization, that provides a holistic suite of solutions, powered by AI technology and activates the world's largest set of commerce data to predict outcomes and deliver targeted ads throughout the buyer journey, from discovery to purchase.

Our technology is optimized to drive trusted and impactful business outcomes efficiently and effectively for our advertiser, retailer and media owner clients. These include, for example, driving discovery of our clients' brand, products and points of purchase, enabling effective customer acquisition and engagement in their commerce environments and ultimately increasing volume of product sales, and increasing post sale loyalty and lifetime value. For media owner and retailer monetization, this includes driving advertising revenue and yield by monetizing their data and audiences with consumer brands both directly and through indirect demand partners.

Our Solutions

CRITEO // COMMERCE GROWTH

Commerce Growth is a powerful, performance marketing tool used by Direct-to-Consumer brands and their agencies to drive discovery and to acquire and retain high value customers.

| DTC BRANDS | AGENCIES (Performance Marketing teams) |

GO! **Commerce Go** is Criteo's highly automated and next generation Commerce Growth tool set which allows advertisers to create and launch an outcome-based campaign in five clicks.

CRITEO // COMMERCE MAX

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

| ESTABLISHED BRANDS | AGENCIES (Retail Media & Brand Advertising teams) |

CRITEO // COMMERCE GRID

Commerce Grid is a Commerce Supply Side Platform ("SSP") for media owners and access from the world's leading agencies through the DSP of their choice.

| MEDIA OWNERS | AGENCIES (through DSP of choice) |

DEMAND SIDE
17k+ CLIENTS
SUPPLY SIDE

CRITEO // COMMERCE YIELD

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

| MARKETPLACES | RETAILERS |

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Culture and Values

Criteo at a Glace: Key Figures & Performance Highlights

FINANCIAL RESULTS

$1,933 million
revenue for the year ended December 31, 2024

$390 million
adjusted EBITDA

$1,121 million
contribution ex-TAC

$115 million
net income

INFRASTRUCTURE

36,500
servers in 11 data centers
(incl. three network Points of Presence)

1.8
petabyte of random-access memory

100%
of the CO_2 emissions linked to data centers use are offset[3]

EMPLOYEES AND HUMAN CAPITAL MANAGEMENT

3,540+
employees (total headcount)[4]

24,468
training hours delivered to our employees[5]

0%
pay gap between women and men

41%
women employees

CLIENTS

17,000 (approx)
clients served

40%
direct client relationships

90% (approx)
client retention rate since 2011

60%
advertising agencies or third-party relationships

33%
Criteo Retail Media revenue comes from agencies

Exposure to
$1 trillion
in online sales transactions on our clients' digital properties

$2 trillion
target digital ads delivered

PRIVACY, DATA PROTECTION, AND CONTENT CONTROL

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

RESEARCH & DEVELOPMENT

1,090+
employees were part of the Research and Development and Product, one of the largest R&D teams in the AdTech industry aside from the walled garden platforms

$279.3 million
Research and Development expenses, including expenses related to the Product group

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[3] Either directly by the data center providers or through Criteo's own purchasing of Renewable Energy Certificated ("REC") [4] This figure differs from the total headcount KPI presented in our Annual Report on Form 10-K because in this CSR Report we take into account "inactive" employees whereas inactive employees are excluded of the Annual Report on Form 10-K KPI. [5] Sum of training hours related to instructor-led, online and coaching sessions

CSR Approach & Governance

Contribution to UNSDGs

CSR Approach & Governance

At Criteo, sustainability means fostering a responsible future where positive impacts are an extension of business and prioritize the preservation of our planet, the well-being of our communities, and the integrity of the adtech industry.

Criteo is committed to continuous improvement and generating a positive impact across all areas of Corporate Social Responsibility ("CSR"), prioritizing environmental sustainability and Diversity, Equity and Inclusion ("DEI"), while maintaining ethics as a fundamental cornerstone. Together with our employees, partners, clients, and consumers, we can shape our future growth and define the value we want to create for society.

ENVIRONMENT   View →

We are reimagining our business practices to build a sustainable future for all while reducing our environmental footprint. Our commitment to environmental sustainability influences our decision-making, shapes our behaviors, and impacts the experiences of our stakeholders.

Our environmental initiatives are conducted by our sustainability team with the support of our "Green Community" In 2022, we developed an environmental roadmap and have since set ambitious goals to improve our environmental impact. In 2024, we published carbon reduction targets and trajectories, which were approved by the SBTi and continued our greenhouse gas ("GHG") emissions reduction and adaptation efforts in alignment with the Paris Agreement.

SOCIAL   View →

Our commitment to DEI is reflected in everything we do at Criteo, including how we work, how we treat each other, and the impact we have on our clients, partners, and the consumers we serve. Our initiatives are conducted by our DEI team and supported by seven of our Employee Resource Groups ("ERGs").

→ **Diversity:** Increase our efforts to attract, hire, develop, and retain diverse talent, as well as represent varied identities and backgrounds, collectively and as individuals

→ **Equity:** Ensure equitable opportunities for learning, career, and compensation, as well as provide fair treatment, access, opportunity, and advancement for everyone at Criteo

→ **Inclusion:** Strengthen a sense of belonging for all employees, partners, clients, and the consumers we serve, as well as a sense of value that is felt throughout Criteo

GOVERNANCE   View →

In 2023, we set up a Sustainability Committee in charge of overseeing Criteo's sustainability strategy which meets each quarter. This internal committee is chaired by our Chief People Officer and is made of a mix of internal senior stakeholders with strong sustainability commitments.

The committee plays a key role in supporting both leadership team and the wider team on our sustainability journey. By raising awareness, promoting informed choices, and encouraging the right actions, committee members help drive progress toward our commitments and cultivate a culture of environmental and social responsibility throughout the organization.

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CSR Approach & Governance

Contribution to UNSDGs

Contribution to UNSDGs

Criteo's activities influence both society and the environment through a wide range of programs that span our workforce, products and services, the infrastructure required to deliver these offerings to clients, and our relationships with stakeholders and organizations across the Tech industry. Our impact generates both direct and indirect contributions to the **United Nations' 2030 Sustainable Development Goals (SDGs),** an internationally recognized framework for sustainability.

Criteo is committed to the United Nations' SDGs. More information is available here.

4   QUALITY EDUCATION

5   GENDER EQUALITY

8   DECENT WORK & ECONOMIC GROWTH

9   INDUSTRY, INNOVATION & INFRASTRUCTURE

10   REDUCED INEQUALITIES

12   RESPONSIBLE CONSUMPTION & PRODUCTION

13   CLIMATE ACTION

17   PARTNERSHIP FOR THE GOALS

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Environment

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Sustainability

ENVIRONMENTAL • SOCIAL • GOVERNANCE

Environmental Key Results and Objectives

CSR TOPIC	AMBITION	TARGET	2024	2025
Environmental Strategy	**Define an Environmental Strategy and Action plan**	Identify and implement actions to reduce our environmental impact	Achieved	Pursuing action in 2025
		Publish an Environment Statement and Policy	Published. Criteo's Environment policy is available <u>here</u>	Continue to uphold our Environmental Policy and drive meaningful progress toward achieving our targets
GHG Assessment		Publish Criteo GHG category emission	Published	Pursue its publication
		Measure Criteo's annual carbon emission (Scopes 1, 2, 3)	Achieved through our partnership with SWEEP	Continuing annual measurement of Criteo's carbon emission
		Align with the SBTi targets: Scope 1 - reduce absolute Scope 1 GHG emissions by 42% by 2030 from a 2022 base year	The implementation of certain decarbonization levers is in progress	Progressing in line with our targets
		Align with the SBTi targets: Scope 2 - continue active annual sourcing of 100% renewable electricity through 2030	Achieved	Progressing in line with our targets
		Align with the SBTi targets: Scope 3 - reduce absolute Scope 3 GHG emissions from purchased goods and services and business travel by 30% by 2030 from a 2022 base year	Progressing in line with our targets	Progressing in line with our targets

Environmental Key Results and Objectives

CSR TOPIC	AMBITION	TARGET	2024	2025
Data Centers (Infrastructure) and Offices	Reduce the carbon footprint of our Data Centers	Use 100% of renewable energy to power our Data Centers	Achieved	Maintaining 100%
	Manage other environmental impacts related to our Data Centers and Offices	Track Criteo's annual office and data center water consumption	Offices: 6,061 m3 Data centers: 40 millions L	Pursuing action in 2025
	Reduce the environmental impacts linked to our Travels	Offset all carbon emissions related to business trips (air & train) and hotels	Achieved	Pursuing action in 2025
Procurement	Assessing our company and our vendors	Set up a partnership with a Supplier Sustainability Rating Platform and assess key vendors on CSR by the end of 2023	Achieved. Completed Key Vendors CSR Assessment.	Maintaining 80% or above of critical and preferred vendors assessed in 2025
		Improve EcoVadis rating by the end of 2025	Earned the silver medal in 2024 (68/100 points)	Pursuing an improved rating

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Our Environmental Approach in Addressing Climate Change

Our environmental strategy, defined in 2022, paves the way for ambitious short-term and long-term action plans and energy-reduction goals. Over the past two years, we have identified key decarbonization levers aligned with this roadmap, such as closing gas-powered offices to reduce Scope 1 emissions, adopting new cooling methods and renewable energy in data centers, limiting business air travel, and purchasing eco-friendly servers.

Additionally, we held **Leadership Climate Workshop** where Criteo's senior leadership deep dived into sustainability and climate strategies. This workshop was designed to equip our leaders with the knowledge and mindset needed to fully integrate environmental sustainability into their strategic decisions, daily operations, and approaches to business challenges.

2024

Criteo published its **SBTi targets** for 2030, aligned with the 1.5°C scenario of the Paris Agreement:

➔ **Scope 1:** Criteo commits to reduce absolute Scope 1 GHG emissions by 42% by 2030 from a 2022 base year.

➔ **Scope 2:** Criteo commits to continue active annual sourcing of 100% renewable electricity through 2030.

➔ **Scope 3:** Criteo further commits to reduce absolute Scope 3 GHG emissions from purchased goods and services and business travel by 30% by 2030 from a 2022 base year.

SCIENCE BASED TARGETS

BUSINESS AMBITION FOR **1.5°C**

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Our Environmental Approach in Addressing Climate Change

In 2024, we responded to the **CDP Climate Change Questionnaire** and we obtained a "D" rating. The score serves as a reference and allows us to set specific upcoming targets. We also used the TCFD recommendations to build our environmental strategy and low-carbon trajectories.

We also established in 2023 an **Infrastructure Sustainability Procurement Policy** focusing on three aspects: data center selection, hardware selection, and decommissioning processes. This policy outlines our commitment to integrating sustainable practices into our infrastructure procurement processes. All new Request for Proposal ("RFPs") automatically and systematically include a CSR assessment developed by our procurement team. Criteo also signed a partnership with EcoVadis in 2022 to work on defining the basis of its sustainable Procurement approach.

Our Travel policy was replaced in 2024 by a new **Sustainable Travel Policy**, which promotes sustainable travel practices among employees by outlining situations when air travel is prohibited and providing guidance on booking environmentally friendly hotels through our travel partner.

All these actions align with our new **Global Environmental Policy** (available here) adopted in 2024. This policy, as well as our efforts to reduce our carbon footprint, demonstrates our commitment to operate responsibly and is a step forward to drive a positive change in the industry.

Criteo's Carbon Footprint

In 2022, we completed our first comprehensive global GHG assessment, covering Scopes 1, 2, and 3 for the year 2021, with the support of external climate experts. For subsequent years, we have leveraged the SWEEP tool to ensure robust and consistent tracking. This initial assessment covered Scopes 1, 2, and 3 and was conducted in accordance with the GHG Protocol methodology. It helped us identify the main sources of emissions in our value chain and therefore pinpoint the most relevant decarbonization drivers.

SWEEP

GREENHOUSE GAS PROTOCOL

OUR CARBON FOOTPRINT RESULTS

● Scope 1   ● Scope 2   ● Scope 3

2024

78,268 tCO2eq
Total CO2 emissions (Scopes 1 + 2 + 3)
Location-based[6]

60,579 tCO2eq
Total CO2 emissions (Scopes 1 + 2 + 3)
Market-based[7]

Compared to revenue, the ratio of Criteo's carbon footprint for Scopes 1, 2, and 3 in 2024 thus amounted to **40 tCO2eq/million $** (Location-based) and **31 tCO2eq/million $** (Market-based).

BY SCOPE (LOCATION-BASED)

1.3%   22.6%   76.1%

BY SCOPE (MARKET-BASED)

0.4%   99.6%

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Criteo's Carbon Footprint

This year we have been collaborating closely with **Carbone4**, an ESG consulting firm, to redefine our Scope 3 carbon accounting methodology, with a focus on the "Use of Sold Products" category. This updated approach will provide more accurate and reliable carbon data.

OUR CARBON FOOTPRINT RESULTS

● Corporate   ● Infrastructure   ● Business   ● Events

PERIMETER	2023 (N-1 - in tCO2eq)	2024 (N -in tCO2eq)	N/N-1 EVOLUTION
Corporate	10,344	23,909	+131%
Infrastructure	37,955	33,009	−13%
Business	88,152	21,110	−76%
Events	212	238	+12%
Total CO2 emissions (all perimeters)	**136,644**	**78,266**	**−43%**
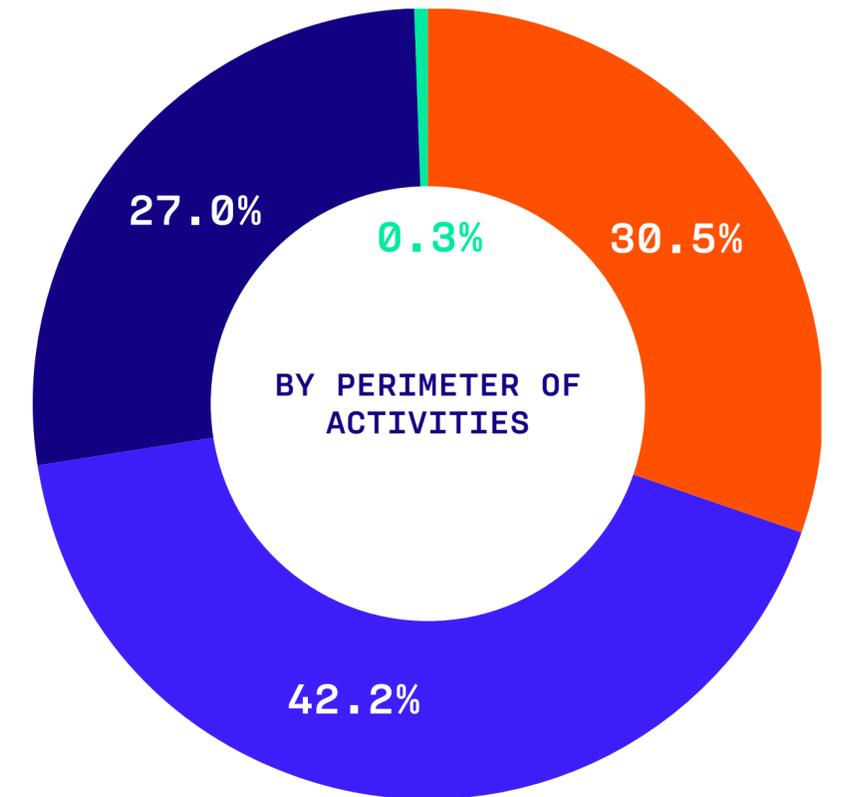
Approximately **69.2%** of Criteo's 2024 GHG emissions were induced by the infrastructure and business perimeters (use of the Criteo solution), and almost all the emissions came from Scopes 2 and 3. The evolution of our emissions between 2023 and 2024 highlights the efforts and actions undertaken this past year to reduce Criteo's environmental footprint across our entire value chain.

BY PERIMETER OF ACTIVITIES

- 30.5%
- 0.3%
- 27.0%
- 42.2%

Environmental Impact of Data Centers and Hardware

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

During the year 2024, Criteo deployed servers in 14 worldwide data centers ("DCs"), all owned by external service providers. This network includes:

11 data processing centers

3 POP networks

Criteo's server infrastructure accounts for one of its largest environmental impacts (42.2% of Criteo's overall carbon footprint, and more than 96.5% of Criteo's total energy consumption).

Since 2022, we have been able to retrieve data directly from DCs. Data is collected automatically in real-time, with better accuracy, as it can now be tracked at the rack level (rather than just at the room level). This new process improves data reliability and provides real-time visibility on all DCs' energy consumption, and thus helps define action plans tailored to Criteo's actual consumption.

ELECTRICITY CONSUMPTION AND CO2 EMISSIONS IN DATA CENTERS	2023 (N-1)	2024 (N)	VAR.(N/N-1)
Total electricity consumption	57,646 MWh	55,017 MWh	-4%
Share of decarbonized energy	100%	100%	0%
Share of electricity from renewable energy sources	32%	22%	-10%
Share of electricity offset through certificates	68%	78%	+10%
CO2 emissions generated by DCs (post offsetting efforts)[8]	0 tCO2eq	0 tCO2eq	0%

[8] Regarding the calculation method of CO2 emissions, for DCs totally powered with renewable energy or for where we use RECs to offset emissions, the emissions are considered to be zero. For the other DCs the local factor is used (for more details, see methodological note in the 2024 CSR Report).

Environmental Impact of Data Centers and Hardware

Data center electricity consumption has decreased in 2024 compared to 2023, and it has remained stable relative to revenue, at 28.5MWh per million USD in 2024, compared to 29.6MWh per million USD in 2023. Similarly, the associated CO_2 emissions have continued to decrease, due to our efforts to reduce our carbon footprint, as shown in the graphs below. When we cannot supply DCs directly with decarbonized energy, we offset carbon emissions by purchasing Renewable Energy Certificates ("REC").
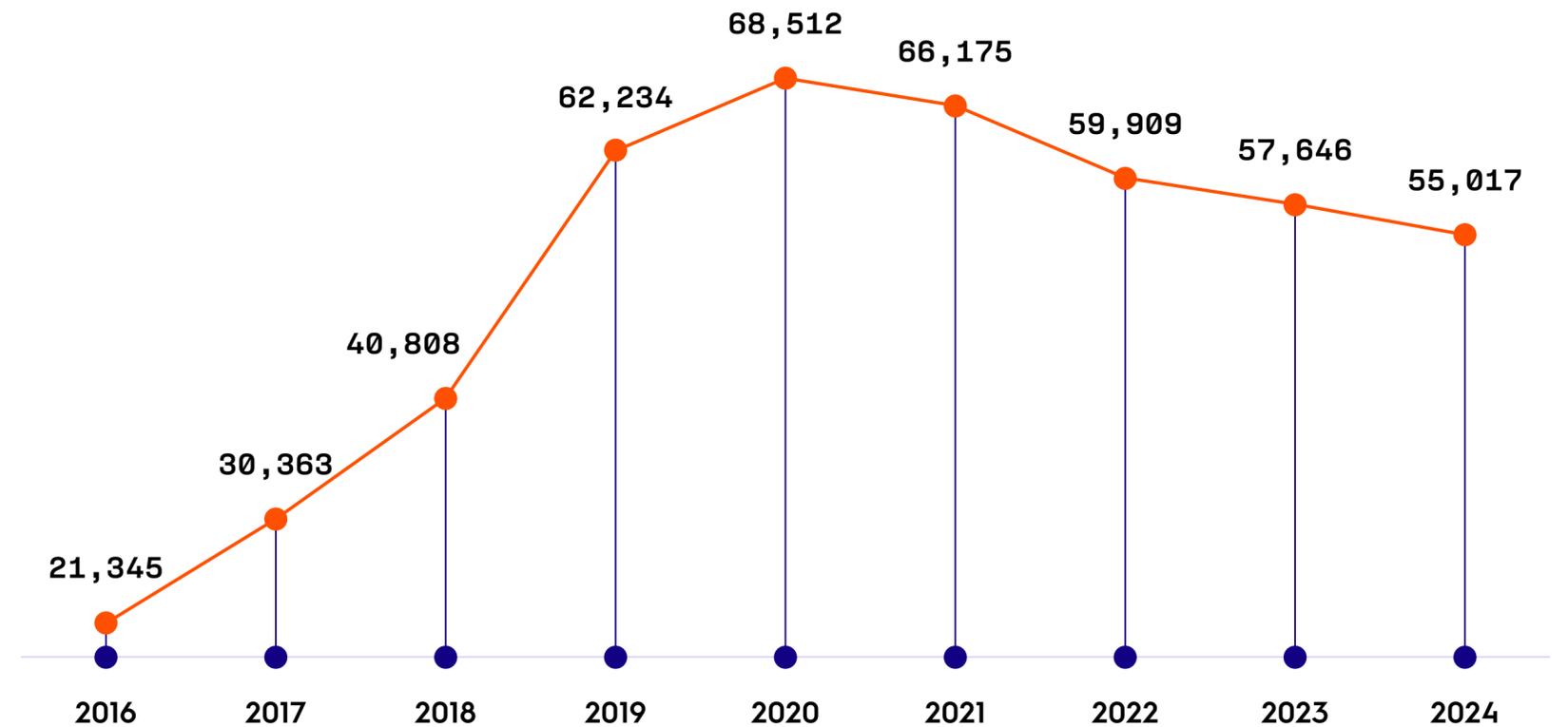
2024

100%

of the CO_2 emissions linked to data centers use are offset, either directly by the data center providers or through Criteo's own purchasing of RECs.

55,017 MWh

Data center's electricity consumption
(compared to 57,646 MWh in 2023)

DATA CENTER'S ELECTRICITY CONSUMPTION FROM 2016 TO 2024 (MWH)

Year	Value
2016	21,345
2017	30,363
2018	40,808
2019	62,234
2020	68,512
2021	66,175
2022	59,909
2023	57,646
2024	55,017

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Environmental Impact of Data Centers and Hardware

The perimeter of each emission category is defined below[9]:

➔ **Electricity consumption:** The emission related to the electricity directly consumed by the data center during the year.

➔ **Purchases of goods and services:** The emission related to the manufacturing and delivery of the servers.

➔ **Others:** All other topics related to the data center such as network, bandwidth, cables, fibers, and waste.
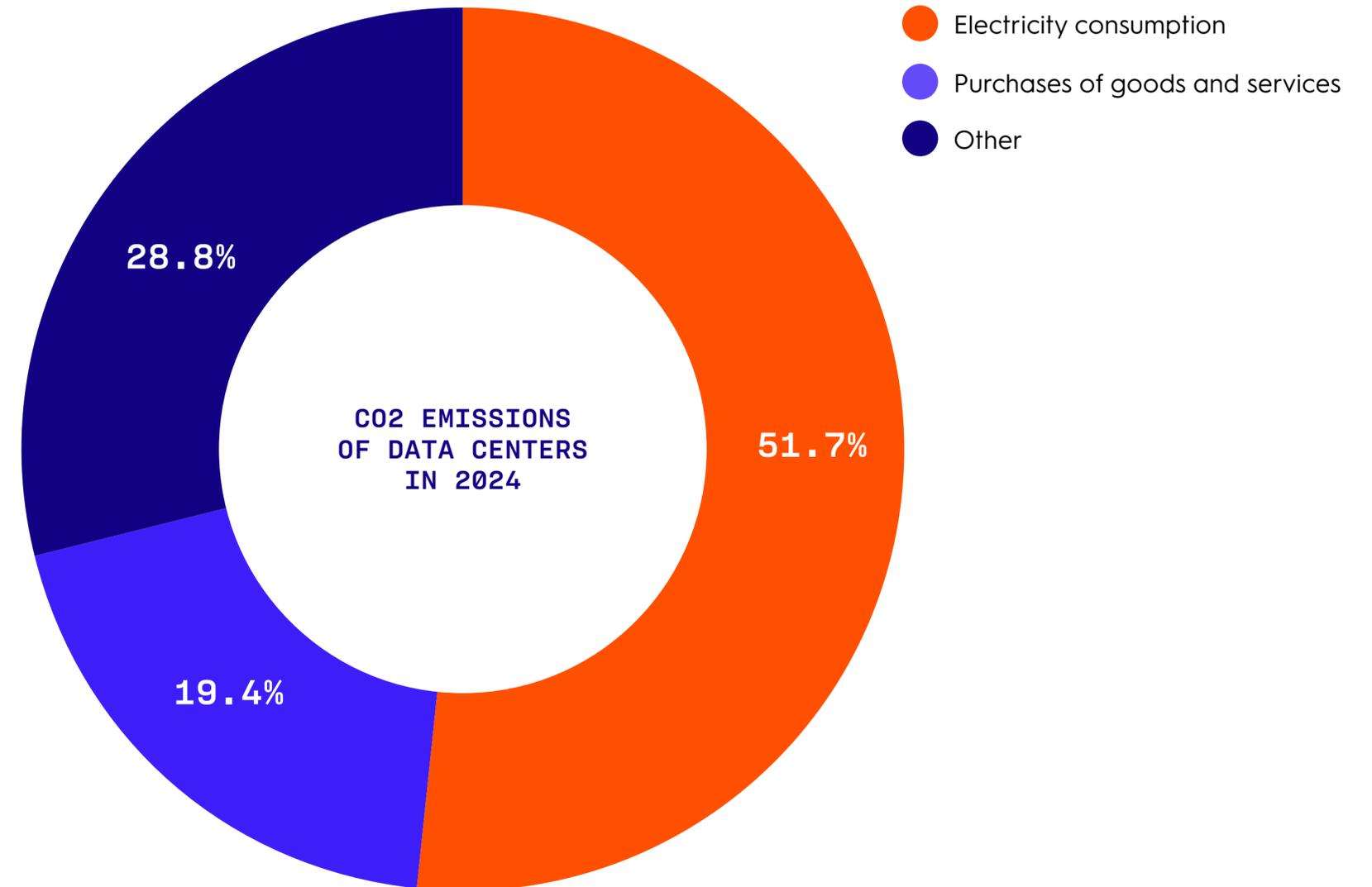
● Electricity consumption
● Purchases of goods and services
● Other

CO2 EMISSIONS OF DATA CENTERS IN 2024

51.7%

19.4%

28.8%

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

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Environmental Impact of Offices and Travel

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

This starts with the selection of our buildings. Each office location is reassessed when contracts with landlords are set for renewal. This assessment considers increasingly demanding environmental factors.

Our global action plan is to move to better offices in terms of the environment whenever possible, ideally certified LEED[10] or BREEAM[11]. Thus, many of our offices were built according to high environmental quality building norms.

2024

The equivalent of

77%

of our leased offices are covered by a green certification based on office area in m²
(compared to 66% in 2023).

1,723 MWh

Total office electricity consumption
(compared to 1,590 MWh in 2023)

31%

from renewable energy source
(compared to 29% in 2023)

0.5 MWh/employee

Total Electricity consumed in offices per employee
(compared to 0.44 MWh/ employee in 2023)

CO_2 EMISSIONS	2024 (N-1 - in tCO2eq)
From electricity and natural gas consumption (offices) in tCO2eq	706
From business trips - in tCO2eq	7,026
From commuting - in tCO2eq	84
Carbon footprint per employee (offices consumption + business trips + commuting) - in tCO2eq/employee	2.4/employee

The increase in emissions from 2023 to 2024 is primarily due to two factors: a significant global event hosted by one of our departments and the resumption of in-person team events.

2024

tree-nation

In 2024, Criteo offset all emissions from business travel and hotel stays through VCS[12] certified credits in partnership with the non-profit Tree-Nation (see more details here).

[10] Leadership in Energy and Environmental Design certification provides a framework for healthy, highly efficient, and cost-saving green buildings, which offer environmental, social and governance benefits. [11] BRE Environmental Assessment Method is the world's leading assessment method for improving the environmental performance of buildings. [12] Verified Carbon Standard CO2 Certification. Learn more here.

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Product Sustainability

In 2024, Criteo expanded its commitment to product sustainability by hiring two dedicated experts: a Senior Manager of Product Sustainability and a Data Scientist specializing in Product Sustainability. Additionally, Criteo established a formal sustainability role within the R&D team (Manager, R&D Sustainability) to align product sustainability efforts with the Company's global sustainability roadmap.

Over recent years, the media industry, particularly in Europe, has launched various initiatives to reduce its carbon footprint. As part of this effort, international companies are increasingly collaborating to establish standardized frameworks, such as common methodologies for calculating CO_2 emissions from campaigns. Criteo actively participates in about a hundred of these organizations, contributing to the development of industry-wide solutions.

Natural Resources Consumption and Waste Management

NATURAL RESOURCES CONSUMPTION FOR OFFICES AND DATA CENTERS

2024

In 2024, Criteo assessed the total water consumption of its DCs at approximately **40 million liters** (compared to 65.5 million L in 2023).

This figure was based on data provided directly by the DCs or, where unavailable, estimated using industry-standard Water Usage Effectiveness ("WUE") values multiplied by annual power consumption. The calculation employs conservative assumptions, meaning actual water usage may be lower. Criteo is committed to refining this data in future years to improve accuracy.

In offices, Criteo's primary use of natural resources, aside from energy, involves paper and water. To minimize water consumption, many offices have adopted sustainable practices such as sensor-equipped faucets and dual-flush toilets. Additionally, Criteo fosters a paperless work environment through the use of digital signatures and collaboration tools. Offices also prioritize waste sorting and recycling, with clearly labeled bins to facilitate proper disposal.

E-WASTE MANAGEMENT

Data centers

To reduce the e-waste[13] in its DCs, Criteo has been able to extend server average usable lifespans from five to six years and is enhancing the tracking of the interval between server decommissioning and recycling. A subcontractor manages decommissioned equipment, with 77% of assets resold on the second-hand market and the remainder recycled or partially reused in 2024.
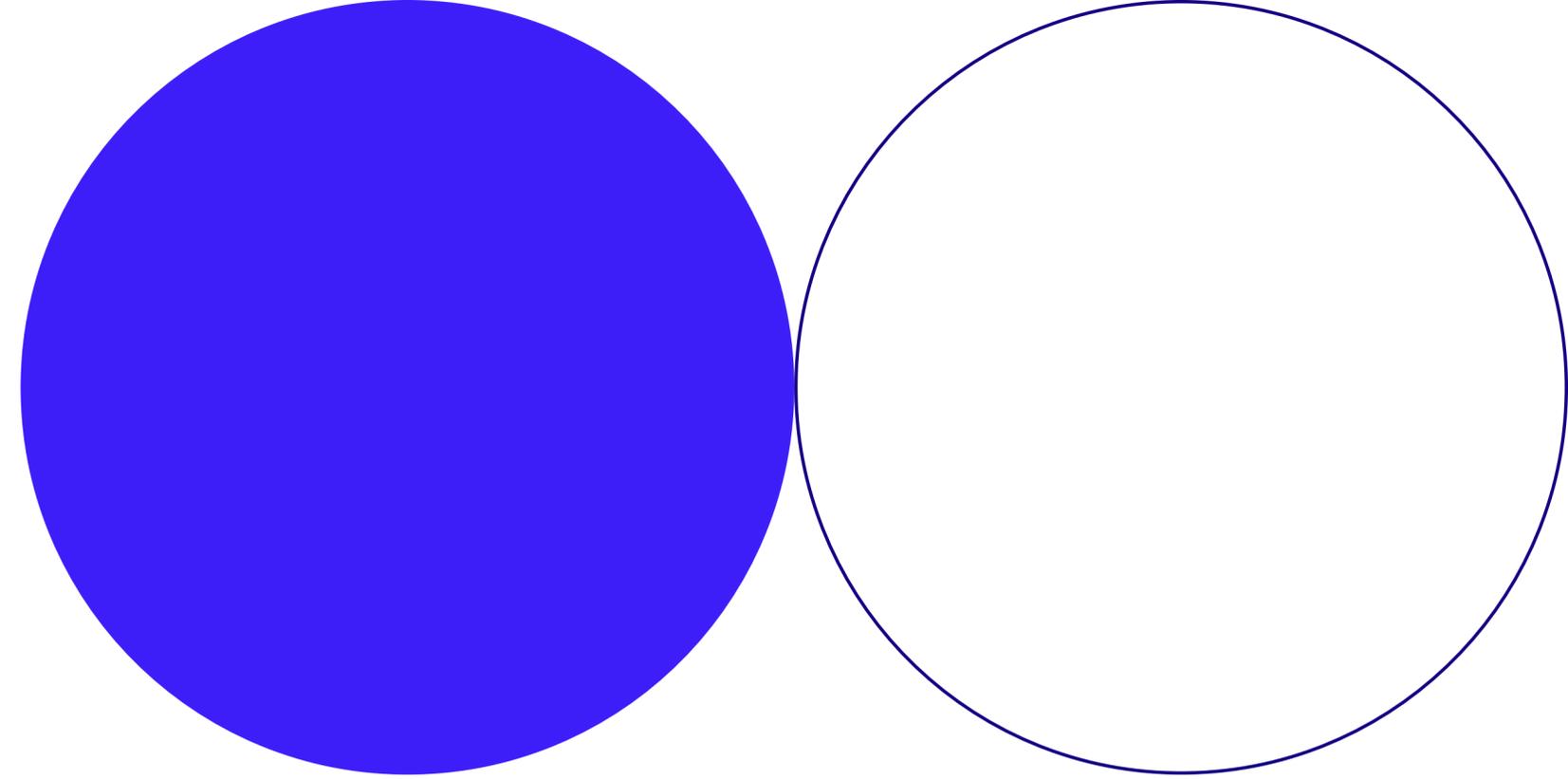
2024

53.1 tons of assets related to infrastructure activities were decommissioned, compared to 79.4 tons in 2023. In 2024, Criteo produced **1.9 tons** of e-waste, compared to 5.8 tons in 2023, due to infrastructure activities.
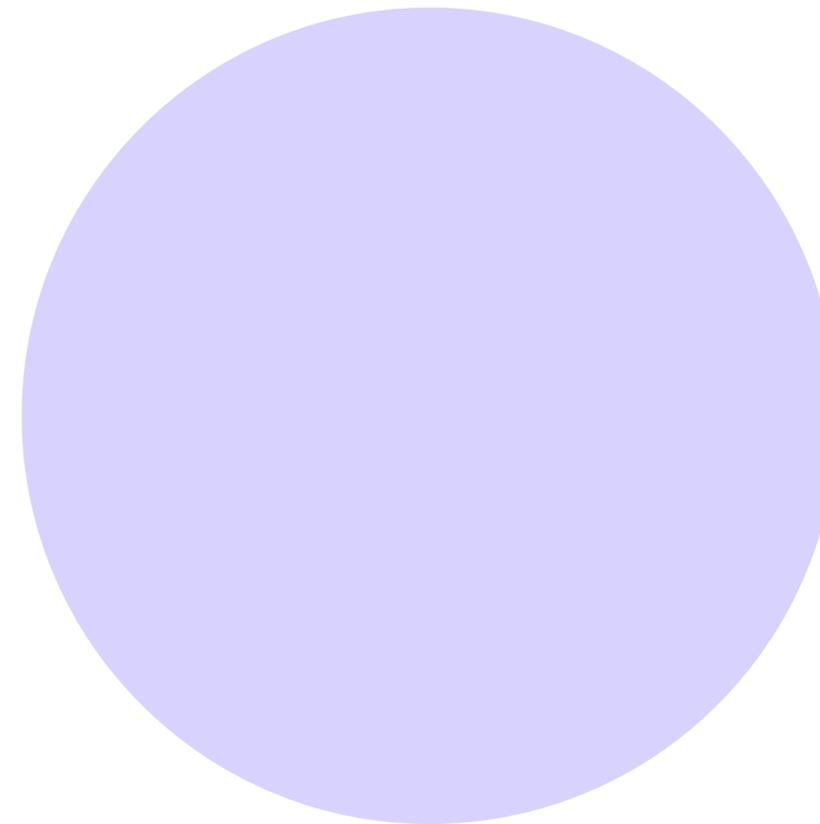
Information Technology

Office e-waste, such as employee phones and computers, is not discarded at end-of-life but instead sold or donated to resellers. **In 2024, this facilitated the refurbishment of 1,537 kg and the recycling of 1,125 kg of office e-waste.**

To optimize device replacement, Criteo has shifted from automatic equipment upgrades every three years to an employee-initiated request system. The Company uses ServiceNow as an inventory tool, tracking key details such as acquisition dates. In 2024, Criteo added the carbon footprint and repairability index of user devices to the employee device catalog, promoting informed and sustainable equipment choices. Efforts are ongoing to enhance transparency in the catalog, helping employees understand all available machine options.

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

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Sustainability

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Social

Social Key Results and Objectives

Supporting Talent Initiatives and Employee Relations

Safety and Well-being at Work

Skills Management and Development

Hackathon

Diversity, Inclusion and Equal Opportunities

Gender Equality at Criteo

Presentation of the Criteo Cares Program

Non-discrimination and Prevention of Harassment

Social Key Results and Objectives

CSR TOPIC	AMBITION	TARGET	2024	2025
Global DEI Strategy	Maintain inclusion scores	Maintain our inclusion scores from the Inclusion Index at 75% or above (targeted culture questions focusing on authenticity, psychological safety, belonging, and inclusive leadership)	80% in 2024	Maintaining the target
	Increase the share of women in Management	Increase the percentage of women being promoted (respecting proportionality principle)	41% in 2024	Maintaining 40% and above
Gender Equality	Increase the share of women in Tech roles	Increase the percentage of women in Tech roles to reach 26% in 2030	21% in 2024	21% in 2025
	Ensure gender pay parity through our Pay Parity Action Plan	Maintain pay parity throughout Criteo, with a bi-annual review and intentional actions in hiring, promotion, and pay cycle management	Achieved. Average compa-ratio was 0.91 for men and 0.90 for women before calibration	Maintaining Gender Pay Parity
Employee Engagement (Criteo Cares Program)	Increase employee engagement within the community groups	Increase the number of employees involved in (at least) one community group	53% in 2024	Maintaining 40% and above
	Deploy the volunteering platform (Giving by Alaya/Benevity)	Increase the number of employees with an account	73% in 2024	Maintaining 55% and above
Employee Skills	Provide access to training and coaching for our employees	Increase the percentage of employees trained (workshop & digital) and coached (coaching programs) - excl. all compliance pieces of training	78% in 2024	Maintaining 70% and above
Benefits	Transparency on our remunerations	Disclose the overall remuneration of the CEO compared to the average employee	Achieved	Pursuing action in 2025

CRITEO

Supporting Talent Initiatives and Employee Relations

Criteo operates globally with 40 offices[14] located throughout the Americas, EMEA, and APAC regions.

2024

579 new hires   **648** exits

Attracting top talent is a cornerstone of Criteo's success, and we prioritize delivering an exceptional candidate experience. Guided by our core values "Open, Together, Impactful", our people team is dedicated to attracting and retaining the best talent.

Our **Employer Value Proposition** is at the very core of the Criteo Culture Book. This book, shaped by feedback from employees and leaders, highlights what makes Criteo unique for clients, partners, and prospective talent.

CULTURE OF FEEDBACK AND ENGAGEMENT

At Criteo, we promote feedback as an important part of our Company culture. The people team supports managers and employees through dedicated training to give and receive feedback in a constructive way through the **performance review process**. We also actively gather feedback on the employee experience through **onboarding and exit surveys** to understand how new hires perceive the onboarding process and identify reasons for employee departures. Criteo also regularly runs **company-wide employee surveys** to measure engagement over time.

From last year, we continue the **Criteo Adventure Global Onboarding program** to enhance new team members' experiences. With the aim to create a seamless and impactful experience for each new hire, this program provides newcomers with the essential knowledge and resources needed to excel at Criteo.

CRITEO

Supporting Talent Initiatives and Employee Relations

Criteo set up **Global Compensation Guidelines** to ensure that compensation offered is competitive depending on several criteria, including jobs and expertise levels, and geographical areas.

2024

€355,596,266.22[15]

annual base and variable salary compensation payouts

We monitor any potential salary gaps across populations depending on gender, age, or location, while considering local practices according to job categories and level of experience. Each year, Criteo conducts an annual corrective measure to bridge the gap between employee's alignment within teams (woman vs. man, new joiners vs. tenured employees, or any other type of discrepancies that could be noticed). This measure, designed to support the Pay Parity Action Plan, was conducted successfully in 2024.

2024

0% gender pay gap

since 2021

The average compa-ratio is 0.91 for men and 0.90 for women before calibration.

As per French regulations, we disclosed our Women-Men Equality Index for France which reached a score of 94/100 (for 2023). We also disclose a **breakdown of Criteo's Named Executive Officers' compensation**, which is available in the Company's Proxy Statement here.

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

The **Spotlight** is Criteo's global recognition program, available for all employees. This platform was launched in 2019 with the objective to reward every small or big achievement employees are accomplishing at Criteo.

CRITEO Spotlight

Safety and Well-being at Work

At Criteo, we are committed to creating a positive work environment and believe that well-being at work ultimately results from a wide array of initiatives. Following the working policy established in 2020 and subsequent employee feedback, Criteo's **Flexible Work Approach** was launched in 2022.

In 2024, we enhanced our investment in in-person connections, supporting team events and encouraging Criteo employees in key locations to come together for gatherings, events, and collaborative work activities. Our goal was to cultivate a stronger sense of community, deepen collaboration, and strengthen the employee experience and connection to our culture.

We also ask employees to provide feedback on their well-being, work-life balance, and workload once a year through a questionnaire, and to have a follow-up one-to-one conversation with their manager to discuss their well-being at work and agree on actions if needed. In 2024, this annual **Well-being Check-In campaign** was conducted worldwide during Q2.

2024

58%
of employees provided their feedback through the questionnaire, and **86%** of them said their workload allowed them to have a fair work-life balance.
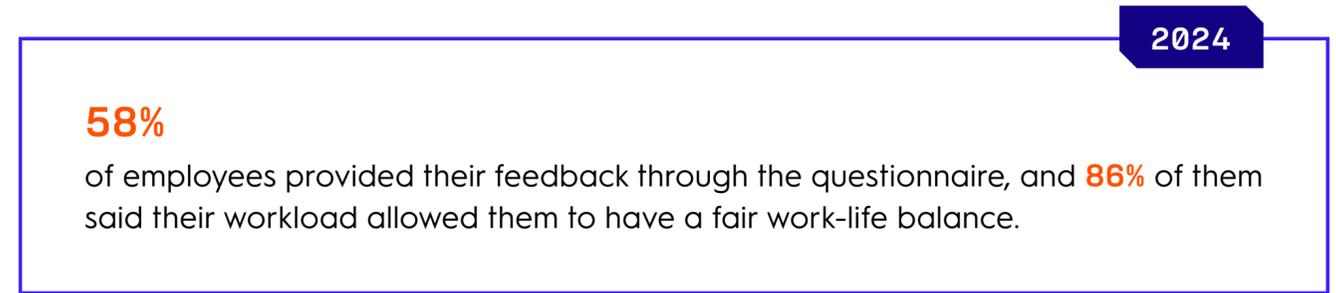
Criteo continues to provide an **Employee Assistance program** across all countries. This is a free and confidential external helpline that is available 24/7[16] for support on various issues. In 2022, Criteo expanded its support initiatives by establishing an internal network of **Mental Health First Aiders** composed of 100 Criteo employees.

SAFETY AT CRITEO

At Criteo, ensuring the **Health, Safety, Environmental, and Physical Security** ("HSEPS") of our people, operations, and communities is a cornerstone of our business practices. Guided by a culture of care and innovation, we have taken a major step forward by appointing a dedicated safety professional to develop and implement a robust HSEPS Management System.

➔ **ISO 45001:** Occupational Health and Safety Management Systems

➔ **ISO 14001:** Environmental Management Systems

➔ **ISO 9001:** Quality Management Systems

Criteo has introduced **three foundational policies**: HSE Policy, Cardinal Rules, and Physical Security Policy. These are supported by a comprehensive HSEPS Manual.

Recognizing the importance of employee safety during business travel, Criteo relies on the **International SOS Assistance Tool** which enhances existing emergency support provided by our healthcare insurer by offering a 24/7 hotline for immediate assistance on security-related issues and real-time tracking of employee travel for rapid identification and outreach in emergencies.

Skills Management and Development

The various types of learning and development solutions we provide are referred to as:

➜ **Instructor-led trainings:** "live trainings" and "virtual classrooms"

➜ **Online trainings:** trainings autonomously followed by employees through digital learning platforms

➜ **Coaching sessions:** 1-to-1 sessions with a coach on well-being, professional development, leadership and maximizing strengths

➜ **Mentoring:** A mentor/mentee program focused on soft skill development

In 2024, the satisfaction rate of instructor-led training is 4.5 out of 5. Criteo provides all employees with four online training platforms[17] which provide access to over 100,000 training courses and allow free registration to workshops.

LEARNING QUEST

In 2024, Criteo advanced its internal learning ecosystem by further implementing our **Learning Management System (LMS), internally called Learning Quest.** This platform enhances flexibility in content creation and management, reducing reliance on external providers while enabling real-time adaptation to employees' evolving training needs.

Employees completed extra online trainings representing roughly **8,423 hours**, covering subjects such as Preventing Harassment in the Workplace (**35%**), the on-boarding modules «FlyCriteo» and «Welcome to Criteo» (**12%**), Security for us (**15%**), and Code of Business Conduct & Ethics (**37%**).

Social Key Results and Objectives

Supporting Talent Initiatives and Employee Relations

Safety and Well-being at Work

Skills Management and Development

Hackathon

Diversity, Inclusion and Equal Opportunities

Gender Equality at Criteo

Presentation of the Criteo Cares Program

Non-discrimination and Prevention of Harassment

Hackathon

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

2024

Hackathon 2024 was a remarkable edition with
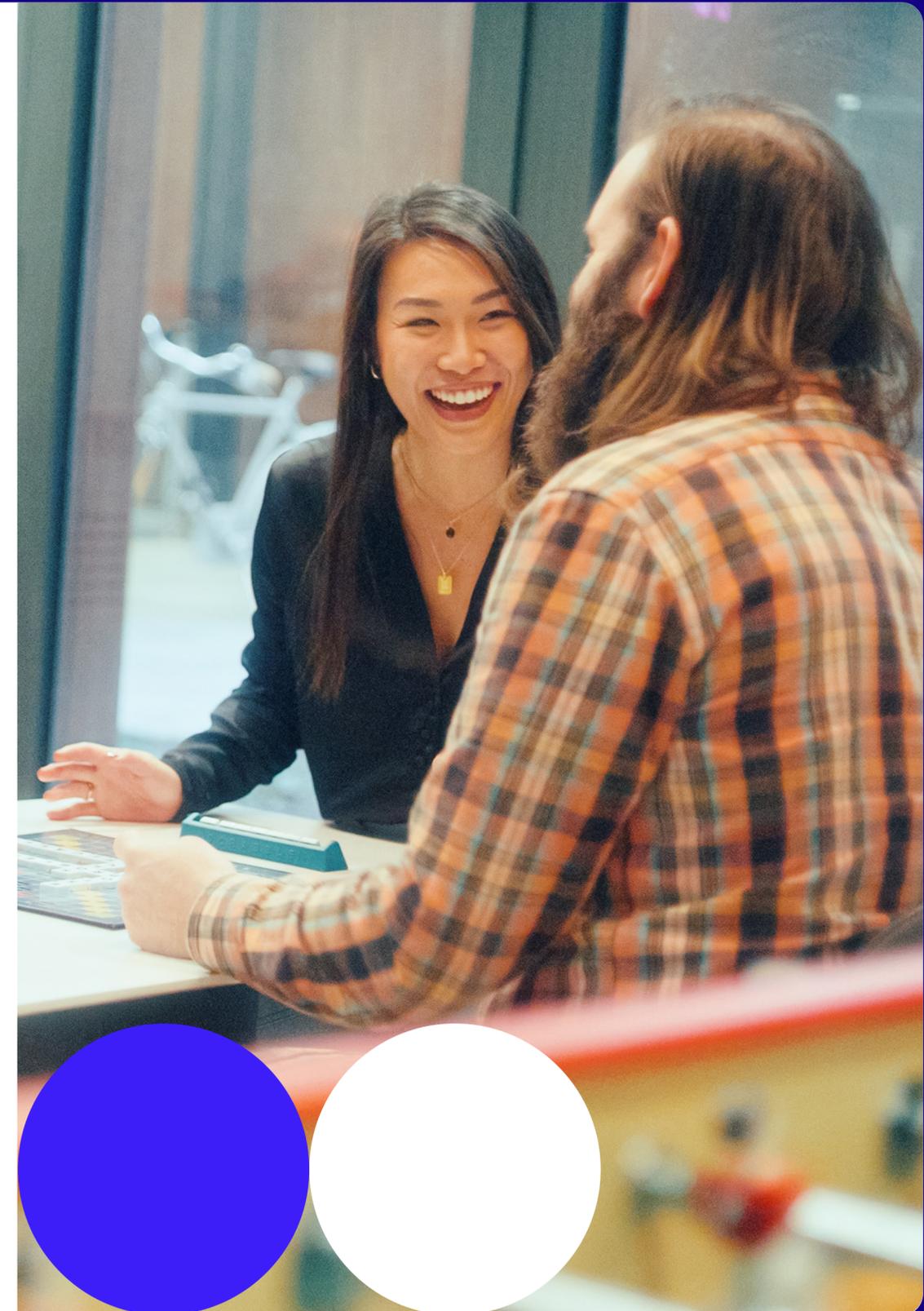
409 participants

The collaborative spirit led to the development of

74 innovative projects

+5% vs. 2023

including several in a CSR-focused track, spanning across

20 offices worldwide

CRITEO Step Up!

Diversity, Inclusion, and Equal Opportunities

DEI is at the heart of Criteo's values. While this commitment is embodied by all employees, Criteo's dedicated DEI team is responsible for spreading a day-to-day DEI culture, embedding it into Criteo's DNA, and acting as a bridge between employee community groups[18] and the leadership team.

D **DIVERSITY**

Representation of varied identities and differences, both individually and collectively as individuals

E **EQUITY**

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

I **INCLUSION**

The sense of belonging and value that is felt throughout Criteo

DEI OBJECTIVES 2024

Focusing on Hiring Programs

➔ Increasing women in Tech roles[19] to 26% by 2030

➔ Strengthen disability inclusion – attraction, hiring, and onboarding

➔ Supporting inclusive hiring practices (inclusive hiring training & Voluntary Disclosure Dashboard), including with respect to underrepresented minorities in the U.S.

Developing and Retaining Diverse Talent

➔ Career development and sponsorship for under-represented groups

➔ Career development and sponsorship for Women in Tech Network

➔ Global mentoring program

Strengthening our Inclusive Culture

➔ Maintaining our very high Inclusion Index

➔ Preventing harassment training

➔ Engaging employees in the Criteo Cares program

[18] Employee Resource Groups. [19] Women in Tech roles include women in R&D, Internal IT, Products, Analytics, RTB-Tam (Real Time Bidding-Tam, Global Supply and Business Development), S&O Developers (Global Automation Development), Technical Onboarding, and Technical Solutions- Client Focus & and Technical Solutions- Solution Focus.
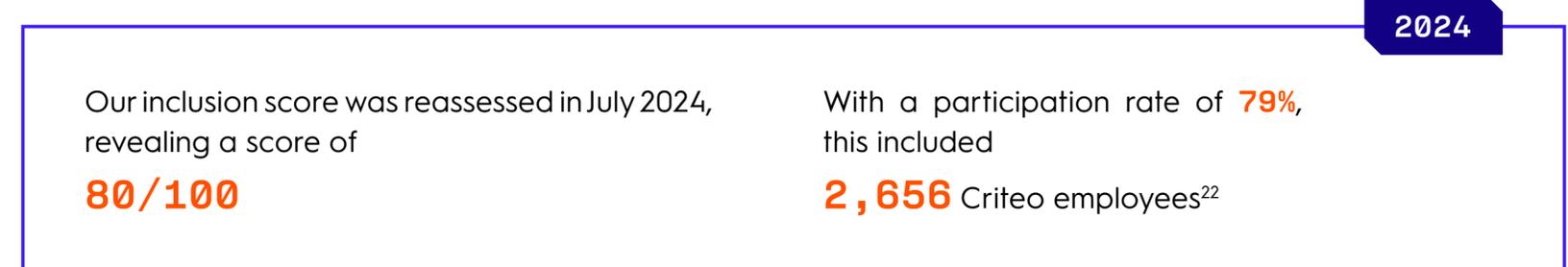
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Diversity, Inclusion, and Equal Opportunities

Established in 2021, our DEI strategy is communicated in Criteo's **Global DEI Vision and Commitments**[20], Criteo's **DEI Policy**, and Criteo's **Inclusion Index** – among other major initiatives.

Today, our priorities are:

→ Strengthening our culture of inclusion (and maintaining our high Inclusion Index score) through learning programs, workshops and leadership engagement

→ Increasing our efforts to attract and retain diverse talent, including women in Tech roles, disability inclusion, and underrepresented minorities in the U.S.

→ Strengthening our commitments through engagement and programs via Criteo Cares and community groups roadmap delivery

→ Ensuring full pay equity across all Criteo locations globally

GLOBAL INCLUSION INDEX[21]

In 2021, Criteo established its first Inclusion Index, to evaluate our culture of belonging, authenticity, psychological safety, and inclusive leadership.

2024

Our inclusion score was reassessed in July 2024, revealing a score of

80/100

With a participation rate of **79%**, this included

2,656 Criteo employees[22]

INVESTING IN NEW DEI PROGRAMS

Key DEI programs developed in 2023 and continued in 2024 included:

→ **Women in Tech Sponsorship program:** Launched in 2023, this program is a dynamic initiative aimed at supporting the career development and retention of women in our Tech teams while fostering a more inclusive culture

→ **EmpowerU Sponsorship program:** U.S.-specific, six-month initiative aimed at empowering employees, particularly addressing the underrepresentation of BIPOC individuals

→ **The Pilot Mentoring program** focuses on career and skills development primarily aimed at women in R&D

Gender Equality at Criteo

Criteo has made clear commitments towards advancing gender parity and is proud to drive meaningful change for women in Tech.

98 /100

As per French regulations, we disclosed our Women-Men Equality Index for France which reached a score of **94/100**. As stated earlier, the gender pay gap is **0%** since 2021 (average compa-ratio is 0.91 for men and 0.90 for women before calibration)
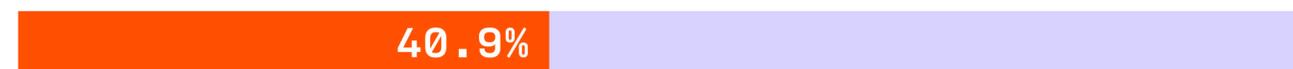
41%
of our total workforce were women

36%
of our total managers were women

33%
of our directors and VP were women

40.9%
of promoted employees were women

As a signatory member of the **Tech for Good[23] Call**, Criteo also made strong commitments to improving women's representation in leadership positions (more information available here).

We had **21% of women in Tech roles in 2024** and aim to increase by 1% every year to reach the worldwide average in 2030, which currently stands at 26%.

Additionally, **Criteo's gender equality agreement** in France, renewed in December 2024 for four years, supports equal pay, diversity during recruitment processes, equal access to training, and equal opportunities for career development and promotions. As part of this agreement, several targets[24] were set, including eliminating unjustified pay gaps, increasing the proportion of women to 21% in tech roles and 34.5% of the total workforce in France within four years, and ensuring the promotion rate for women is at least equal to their overall representation in the French workforce.

To increase the retention of women in Tech roles, Criteo's Women-in-Tech Network aims to:

1. Multiply initiatives to attract more women into Criteo Tech roles

2. Ensure that the women in our Tech functions feel connected and supported in their growth and engagement at Criteo

3. Improve our inclusive culture in Tech

[23] "Tech for Good" literally means "technology for good". This indicates a collective awareness that positive societal impact must be placed at the heart of Tech and digital transformation. [24] The targets mentioned in this paragraph concern Criteo's French entities.

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Presentation of the Criteo Cares Program

Criteo's CSR approach consists of two main components: the strategic branch, which is led by the DEI and sustainability teams, and the employee engagement branch known as Criteo Cares. Launched in 2018, Criteo Cares aims to unify local initiatives, coordinate existing solidarity and sustainability actions across the Company, and maximize their overall impact.

Criteo Cares projects are driven by **seven community groups**[25]

Women at Criteo — Critenable Community — Education Community — Green Community

Parents Community — Pride Community — BIPOC Community

and one committee

Criteo Giving

Through **our volunteering and giving platform**, launched in 2021 and called "Giving by Alaya/Benevity[26]", Criteo employees can support causes that are meaningful to them. This platform includes a wide variety of non-profit organizations to give our employees the freedom to use their two Volunteer Paid Time Off ("VPTO") days.

The 2024 Impact Weeks at Criteo showcased our global commitment to making a difference, with dedicated periods in June for EMEA/Americas and August for APAC. Over 305 employees volunteered a remarkable 782 hours through 35 impactful activities across 15 countries, leveraging their VPTO to give back. This year featured several firsts, such as the introduction of region-specific Giving Committee leaders and a dedicated APAC Impact Weeks.

CRITEO

[25] Also known as ERGs "Employee Resource Groups". [26] The Alaya platform (our vendor) was acquired by Benevity in 2022.

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Non-discrimination and Prevention of Harassment

In 2022, Criteo updated its **Code of Business Conduct & Ethics** (available here). It includes the principle of non-discrimination and anti-harassment, which is applicable across all locations globally. Alongside, Criteo developed a global e-learning with country-specific modules related to Preventing Harassment and Discrimination in the Workplace, launched simultaneously. Employees are required to complete this mandatory training annually. In 2024, we delivered our annual Global Preventing Harassment training to employees across all countries, offering it in multiple languages. Additionally, we introduced a global acknowledgment of our DEI Policy to reinforce employees' understanding of workplace discrimination and the expectations for appropriate behavior.

In addition, Criteo applies its **equal opportunity approach**[27] which strictly forbids all forms of discrimination, whether at the recruitment stage or afterward regarding promotions, salary increases, and benefits, and specifies that no employee may be discriminated against based on gender, race, ethnicity, religious belief, disability, national origin, veteran status, marital status, or sexual orientation.

Today, **94 nationalities** are represented in Criteo's global workforce. It is therefore very diverse, with a strong mix of local talent and people from different cultures and backgrounds.

While most of our workforce is less than 45 years old (77% of employees), we are focused on our commitment to provide equal opportunities to all without discrimination based on age, be it through external hires or internal promotions.

Criteo believes in an open, inclusive, and safe work environment and aims to provide visibility and a sense of belonging for LGBTQIA+ people and allies through various partnerships, initiatives, and events, as well as the work performed by Criteo's Pride Community.

Criteo continues to advance its commitments to support the BIPOC Community. One of the key actions was to develop a network of leaders all around the world, particularly in EMEA. With around 200 members, the BIPOC Community's mission is to create a culture that empowers employees of color by creating safe spaces, providing resources for career development, and offering educational opportunities to the Criteo community. The BIPOC Community at Criteo was inspired by the BIPOC project.

Criteo's Global Disability Policy reflects our commitment to fostering a diverse workforce, and integrating equal opportunities for people with disabilities across our policies, procedures, decisions, and operations. Criteo is committed to ensuring equal access and participation for individuals with all types of disabilities (whether physical or mental, visible or hidden), while supporting their dignity, respect, and independence.

Criteo also recognizes the importance of freedom of speech for employees, and no discrimination is directed at employee representatives. Criteo's Code of Business Conduct & Ethics points out the importance of respecting freedom of speech. Criteo's **Human Rights Policy** is available on the Company's IR website here.

Governance

CRITEO
Sustainability
ENVIRONMENTAL • SOCIAL • GOVERNANCE

Governance Key Results and Objectives

CSR TOPIC	AMBITION	TARGET	2024	2025
Sustainability Governance	Increase visibility and ownership of sustainability issues by all teams	Organize a quarterly meeting with the Sustainability Committee and disclose the participation rate	Organized one meeting per quarter in 2024 with average participation rate at 83%	Pursuing action in 2025
Ethics	Train employees regarding compliance and ethics	Maintain the number of employees who completed the Code of Business Conduct and Ethics	97% in 2024	Maintaining 80% or above
Gender Diversity	Board of Directors Gender Balance	Have a minimum of 40% of each gender in our Board of Directors (in accordance with French law)	Achieved. 50% women-men in the Board of Directors (4 women, 4 men)	Maintaining a minimum of 40% of each gender in our Board of Directors

Sustainability Governance and Dedicated Teams

In 2023, we set up a **Sustainability Committee** in charge of overseeing Criteo's sustainability strategy which meets each quarter. This internal committee is chaired by our Chief People Officer and is made of a mix of internal senior stakeholders with strong sustainability commitments. They come from various departments with different knowledge, policy expertise, and strategic insights. This committee reports to the **Governance, Risk, and Compliance Committee** ("GRCC"), which includes leadership team who oversee all topics related to governance, risk, compliance and matters.

This year marked the Sustainability Committee's first full year of operation since its initiation in 2023. The latest Sustainability Committee meeting was held in October where sustainability ambitions for 2025 were presented and different teams (R&D, infrastructure, product, legal, risk, finance, IR, etc.) introduced their own sustainability projects in line with the sustainability roadmap. All these actions align with the committee's role as the body responsible for guiding the Company's sustainability decisions and commitments. The committee plays a key role in supporting both leadership team and the wider team on our sustainability journey.

In 2024, we reinforced our commitment to sustainability by building on the strong foundation of our dedicated team. Reporting directly to the Global Sustainability Director, this team continues to drive progress on environmental priorities, advance ESG reporting, and ensure the effective implementation of sustainability initiatives across the organization. This focus is critical to our mission and reflects the unique integration of sustainability into the core of our company's DNA, ensuring long-term value for our stakeholders and the planet.

Chief Executive Officer
Sponsor Sustainability across the company

Chief People Officer
Approve the strategy and Chair the Sustainability Committee

Sustainability Committee
Oversee the Sustainability agenda and priorities

SVP Talent, Development, DEI & Sustainability
Oversee the Sustainability agenda and priorities

Sustainability Team
Develop and lead the Sustainability strategy and roadmap

DEI Team
Develop and lead the DEI strategy strategy and roadmap

Environment Team
Develop and lead the Environmental strategy and roadmap

Criteo Cares Program
Enrich the DEI strategy, provide feedback and raise awareness

Code of Business Conduct & Ethics

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

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

In 2023, the completion rate for the Code of Business Conduct & Ethics training was 97%. We aim to maintain this score at 80% or more each year.

CRITEO

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Ethics in Our Ads

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

For that purpose, Criteo has set up a working group comprised of its legal team and AI labs to reflect on the ethical nature of its service and products. A **Product Ethics Committee (PEC)** was also set up, chaired by Criteo's Chief Legal and Transformation Officer, and gathering executives from the product, R&D, legal, HR, marketing and commercial teams. The objective of the PEC is to ensure ethical product development to provide our clients and partners with trusted advertising and maintain a sense of pride in Criteo about our Company's approach.

Criteo is committed to delivering a trusted and safe advertising experience to marketers and media-owners alike. Our supply partners and advertisers are required to follow our **Supply Partner Guidelines** and **Advertising Guidelines**. These guidelines establish a shared framework to promote ethical practices across Criteo's network of publishers in their use of our products and services.

Data Privacy and Information Security

Criteo takes privacy protection and compliance very seriously. Processes and policies are put in place to protect and process data in compliance with applicable privacy and data protection laws. This includes in particular the **European GDPR (General Data Protection Regulation)** and also the **ePrivacy** directive as implemented in the legislation of European Union member states. The legal team actively monitors the evolution of regulations in order to anticipate and prepare for future changes.

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

Emphasizing the continued importance we place on data privacy, a privacy policy that covers all Criteo's products is implemented and regularly updated by Criteo's privacy team. This privacy policy aims to be user-friendly and transparent for users regarding their rights when it comes to data and how to exercise their rights of access or deletion, for example. Criteo's **Privacy Policy** was last updated in 2022, to improve transparency towards users. The current version of the Policy is available on Criteo's website here.

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

PRIVACY BY DESIGN

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

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

Data Privacy and Information Security

STRICT SECURITY MEASURES

As required by applicable law, Criteo maintains strict security measures when collecting user data from clients. We use modern pseudonymous methods, such as MD5[28] and SHA-256[29] double-hashing processes, which are considered as best market practices under the GDPR and in the industry at large. Also, we willingly never store any directly identifying personal information about individual users. Indeed, as mentioned above, the data is "pseudonymized" which does not allow Criteo to identify users.

We implemented in 2018 a **Privacy Compliance Management Software** that allows us to track down and record all data incidents and problems in terms of privacy. It is also an obligation for Criteo to notify the competent national authorities where required. For instance, Criteo must notify the Commission Nationale de l'Informatique et des Libertés (CNIL, the French regulatory body in charge of personal data protection) within 72 hours if any incident occurs that could induce major risks for people's personal data. No such incident occurred in 2024 in relation to the services we provide to our clients.

We also implemented regular phishing simulation campaigns with mandatory pieces of training for employees, in order to raise employees' awareness and to reduce the risk of security incidents.

TRANSPARENCY AND CONTROL

Criteo has long recognized the need to balance relevant advertising experiences with privacy expectations while empowering users to control their experiences.

We are a proponent of transparency and control, and we lead industry and self-regulatory programs supporting these objectives. For example, we are fully committed to the AdChoices icon program led by EDAA[30], the FEDMA[31] Code of Conduct, the IAB[32] Transparency and Consent Framework, the IAB CCPA[33] framework, the NAI[34] Code of Conduct, or the Digital Advertising Alliance CCPA[35] opt-out mechanisms.

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

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

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[28] Message-Digest Algorithm (MD). [29] Secure Hash Algorithm (SHA). [30] European Interactive Digital Advertising Alliance. [31] Federation of European Data and Marketing. [32] Interactive Advertising Bureau. [33] California Consumer Privacy Act.
[34] Network Advertising Initiative. [35] California Consumer Privacy Act.

Anti-Corruption, Whistleblowing and Alert Mechanisms

ANTI-CORRUPTION

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

Criteo has zero tolerance for bribery and corruption. We prohibit any form of corruption, bribery, or kickbacks, whether involving public officials or individuals in the private sector. We observe the standards of conduct outlined in the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, French Loi Sapin II, and the applicable anti-corruption laws of all the countries in which we operate.

WHISTLEBLOWING AND ALERT MECHANISMS

Every Criteo employee, as well as every other third party working for Criteo, has the right and responsibility to report suspected violations of applicable laws, Criteo's Code of Business Conduct & Ethics, or any Company policies, or to raise concerns about situations that feel inappropriate.

All reports are kept confidential as required under applicable law.

CRITEO

Our Awards and Recognitions

More information regarding our CSR and DEI awards is available here.

2022

Ragan Awards
Winners in Global Diversity, Equity, and Inclusion Commitment and CSR / ESG Engagement Communication

Top 50 Inspiring Workplaces (NOAM)
Ranked #12

Family Friendly Company label
(France)

2023

Glassdoor
"Best Employer"

Strategies Grand Prix Event
"Best Company event"

Comparably
"Best Global Culture"

Comparably
"Best HR Team"

Bloomberg
Gender-Equality Index member

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

2023

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

Sunday Times Best Workplaces
Medium Size Workplace

EcoVadis Silver Medal
(68/100)

CDP Climate Change
(C)

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

2024

Diversity in Tech Awards
"Disability Inclusion"

Women in Tech Global Awards
"Diversity and Inclusion Employer of the Year"

EcoVadis Silver Medal
(68/100)

CDP Climate Change
(D)

CDP Water Security
(C)

Ragan's CSR & Diversity Awards
Winner: Global Diversity, Equity and Inclusion Commitment
Honorable Mention: Employee Resource Groups and Event

About This Report - Disclaimer

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

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

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

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

Statements of future events or conditions in this Report, including those that concern future circumstances and results and other statements that are not historical facts and are sometimes identified by the words "anticipate," "believe," "can," "could," "estimate," "expect," "intend," "is designed to," "may," "might," "objective," "plan," "potential," "predict," "project," "seek," "should," "target," "will," "would," or the negative of these and similar expressions, are forward-looking statements. Forward-looking statements are based upon current plans, estimates and expectations that are subject to risks, uncertainties, and assumptions. Should one or more of these risks or uncertainties materialize, or should underlying assumptions prove incorrect, actual results may vary materially from those indicated or anticipated by such forward-looking statements. The inclusion of such statements should not be regarded as a representation that such plans, estimates or expectations will be achieved. Important factors that could cause actual results to differ materially from such plans, estimates or expectations include, among others: macroeconomic conditions, including inflation and fluctuating interest rates that have impacted our business, financial condition, cash flow and results of operations; failure related to our technology and our ability to innovate and respond to changes in technology, uncertainty regarding our ability to access a consistent supply of internet display advertising inventory and expand access to such inventory, including without limitation uncertainty regarding the timing and scope of proposed changes to and enhancements of the Chrome browser announced by Google, investments in new business opportunities and the timing of these investments, whether the projected benefits of acquisitions materialize as expected, uncertainty regarding international growth and expansion (including related to changes in a specific country's or region's political or economic conditions), the impact of competition, uncertainty regarding legislative, regulatory or self-regulatory developments including regarding environment and data privacy matters and the impact of efforts by other participants in our industry to comply therewith, the impact of consumer resistance to the collection and sharing of data, our ability to access data through third parties, failure to enhance our brand cost-effectively, recent growth rates not being indicative of future growth, our ability to manage growth, potential fluctuations in operating results, as well as risks related to future opportunities and plans, including the uncertainty of expected future results and the risk factors in the "Risk Factors" section of our most recent Annual Report on Form 10-K and those set forth from time-to-time in other filings by the Company with the SEC, available through our website or through the SEC's Electronic Data Gathering and Analysis Retrieval (EDGAR) system here.

About This Report - Disclaimer

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

1° Understanding the context:

➔ Understanding the business activity of the Group, the report on the main social and environmental risks relating to those activities, together with the subsequent policies and their results

➔ Assessing the suitability of the procedures used to prepare the CSR Report to ensure relevance, completeness, reliability, neutrality and clarity of the information provided therein

2° Statement compliance review:

➔ Making sure that all information concerning social and environmental issues that needs to be included is effectively included

➔ Verifying that are included the business model and the main risks relating to the activities of the Group and assessing the process of selecting and validating the risks

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

➔ Assessing the collection process of information ensures fair presentation of policy results, including key performance indicators ("KPI")

➔ For key indicators as well as selected qualitative information that our independent third-party reviewer deems significant, (i) verifying proper consolidation of collected data and consistency of trends, and (ii) carrying out substantive tests, on a sampling basis, designed at verifying proper application of definitions and procedures, and reconciling data with supporting documents

➔ Consulting documentary sources and conducting interviews to corroborate the qualitative information that it deems most significant

Reporting period and scope

All information collected and highlighted in the CSR Report covers the period from January 1, 2024, to December 31, 2024. In 2024, the scope of CSR reporting aligns with the scope of financial reporting. All entities within Criteo are included in the 2024 CSR reporting, regardless of their size or when they joined Criteo (e.g., a newly added entity in Romania is also part of the 2024 CSR reporting scope).

CRITEO

Sustainability

ENVIRONMENTAL • SOCIAL • GOVERNANCE

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