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GLOBAL SUSTAINABILITY POLICY

Corporate social responsibility and responsible business conduct framework

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Global Sustainability Policy	October 1st, 2026	-

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Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

I. Introduction and purpose

Criteo is committed to conducting its business responsibly and to creating long term value for its stakeholders while contributing positively to society and the environment. This Sustainability Policy (the “Policy”) sets out the principles, strategic foundations, governance arrangements and commitments that guide Criteo’s approach to sustainability and responsible business conduct across its operations.

This Policy serves as Criteo’s reference framework for sustainability and corporate social responsibility (“CSR”). It articulates how environmental, social and governance ("ESG") considerations are embedded into the company’s strategy, decision making processes, and day-to-day operations. It also provides a consistent basis for internal implementation, external disclosures, and responses to ESG ratings, questionnaires, and stakeholder expectations.

Criteo’s sustainability approach is informed by leading internationally recognized standards and frameworks that support transparency, consistency, and accountability, including the Sustainability Accounting Standards Board (SASB) Standards, the Global Reporting Initiative (GRI) Standards, the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the United Nations Sustainable Development Goals (UNSDGs).

This Policy constitutes a document distinct from the Criteo’s Sustainability Report (the “Report”). The Report is the group’s primary public disclosure on sustainability matters. It communicates Criteo’s sustainability strategy, governance, commitments, performance, and progress on material environmental, social, and governance topics. The Report draws on the principles, disclosures, and indicators of these frameworks to structure its reporting approach and includes selected indicators subject to independent third-party assurance, supporting transparent, comparable, and decision-useful sustainability reporting.

As a global technology company operating within the AdTech ecosystem, Criteo acknowledges its responsibility to manage its impacts on people, communities and the environment, while ensuring high standards of ethics, transparency and accountability. This Policy reflects Criteo’s ambition to act as a responsible actor within its industry and to continuously strengthen its sustainability performance over time.

The Policy complements existing corporate policies, guidelines, codes of conduct and governance frameworks. Together, these documents form a coherent system that supports responsible growth, regulatory compliance, and long-term business resilience.

Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

II. Scope and applicability

This Policy applies across Criteo and all of its subsidiaries and affiliates (collectively, "Criteo" or the "Group"). It applies to all employees, officers, and directors, regardless of role, seniority, or location. Criteo also expects its business partners, suppliers and other third parties to adhere to standards consistent with this Policy when working with or on behalf of the company. These expectations are reflected in Criteo's Third Party Code of Conduct and relevant contractual arrangements.

The Policy addresses environmental, social, and governance topics that are material to Criteo based on its activities, impacts, risks and opportunities, as well as stakeholder expectations. It covers Criteo's operations, products and services, value chain relationships, and interactions with clients, partners, regulators, and communities.

This Policy does not replace or override applicable laws, regulations, or existing internal policies. Where local legal requirements are more stringent, or in the event of any inconsistency between this Policy and any applicable local law or the constitutional documents of the relevant entity, such local law or constitutional documents shall prevail.

Sustainability vision

Criteo strives for continuous improvement and positive impact across social responsibility, inclusion, ethics and the environment. Together with its stakeholders, the Group advances toward increasingly structured and ambitious commitments that support long-term growth and the value created for society.

By acting as a role model within and beyond the AdTech industry, Criteo fosters purpose for its employees and empowers them to make a meaningful impact, both internally and externally.

At Criteo, sustainability means fostering a responsible future where positive impacts are a natural extension of the business, with care for the preservation of the planet, the well-being of communities, and the integrity of the AdTech industry.

Strategic foundations

Criteo's sustainability and CSR strategy is built on a structured and evidence-based approach, informed by its corporate values, its business model and its assessment of material impacts, risks and opportunities.

The strategy prioritizes topics where Criteo can have the most significant influence and where sustainability considerations are closely linked to business performance and long-term value creation. These priorities are identified and regularly reviewed through materiality and risk assessment processes, stakeholder engagement, and benchmarking against recognized standards and industry practices.

Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

Criteo's sustainability strategy is articulated around three interconnected pillars.

- The **environmental** pillar focuses on reducing environmental impacts associated with Criteo's operations, infrastructure, and value chain. It includes climate change mitigation, energy efficiency, resource management, and the integration of environmental considerations into product development and procurement.
- The **social** pillar focuses on people and communities. It covers employee well-being, inclusion and belonging, human rights, gender equality, skills development and responsible relationships with clients, end users and suppliers. This pillar reflects Criteo's commitment to fostering a safe, inclusive, and supportive workplace and to contributing positively to society.
- The **governance** pillar focuses on ethical conduct, transparency, and accountability. It encompasses business ethics, compliance, data privacy and security, responsible advertising practices, and robust governance structures that support informed decision making and risk management.

These pillars are supported by clear governance arrangements, defined responsibilities, and measurable objectives. Progress is monitored through key performance indicators, internal controls and regular reporting, ensuring that sustainability considerations are embedded into Criteo's strategic planning and operational execution.

Criteo recognizes sustainability as a continuous journey, with a strategy that evolves over time in response to changing challenges and expectations, while remaining anchored in its core values and long-term business objectives.

III. Governance and accountability

Strong governance is a cornerstone of Criteo's CSR and sustainability approaches. Criteo has established a governance framework designed to ensure that environmental, social, and governance considerations are integrated into strategic oversight, operational decision making and risk management.

Board oversight

Criteo's Board of Directors has oversight responsibility for sustainability and responsible business matters as part of its broader mandate to support long term value creation. Sustainability topics, including climate-related risks and opportunities, social matters and ethical conduct, are embedded within the Board's governance framework and committee structure.

The Nomination and Corporate Governance Committee ("NCGC") plays a central role in overseeing Criteo's sustainability strategy, policies and performance. It receives regular updates on sustainability priorities, progress, and emerging risks, ensuring that ESG considerations are addressed at the highest level of governance.

The Audit Committee contributes to ESG oversight through its role in reviewing disclosures, internal controls and risk management processes, including those related to sustainability reporting and compliance.

Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

Executive leadership and management responsibility

Executive management is responsible for implementing Criteo's CSR and sustainability strategy and for ensuring that sustainability considerations are embedded into business operations and decision making.

Sustainability responsibilities are anchored within the organization through a dedicated sustainability function and a cross functional global sustainability committee ("Global Sustainability Committee" or "Committee"). This Committee brings together senior representatives from relevant functions to support coordination, accountability and alignment across environmental, social, and governance topics.

The Global Sustainability Committee, chaired by Criteo's Chief People officer, is responsible for steering sustainability priorities, monitoring progress, supporting internal awareness and ensuring alignment with regulatory expectations and external commitments. The Committee reports to the Chief People Officer and interfaces with governance and risk structures to ensure coherence across the organization.

Internal accountability

All employees, officers, and directors are expected to comply with the principles set out in this Policy. Senior employees such as Sustainability Committee representatives are responsible for promoting and embedding these principles within their areas of responsibility. The Sustainability team is responsible for maintaining this Policy and supporting its implementation across the Group.

IV. Environmental responsibility

Criteo is committed to reducing its environmental impact and contributing to the transition toward a more sustainable digital ecosystem. Environmental responsibility is an integral part of Criteo's sustainability strategy and reflects the company's recognition of climate change, resource use, and environmental stewardship as critical priorities. To support these commitments, Criteo measures and manages its environmental impacts, sets objectives and targets, monitors progress, and reports transparently on its environmental performance through its Sustainability Report.

Climate strategy and greenhouse gas management

Criteo's environmental strategy is anchored in the measurement, management and reduction of its greenhouse gas ("GHG") emissions across its operations and value chain. Criteo conducts an annual global GHG assessment covering Scope 1, Scope 2 and Scope 3 emissions in line with recognized standards.

Criteo has established emissions reduction targets validated by the SBTi, aligned with the objectives of the Paris Agreement. These targets guide the company's climate resilience and transition plan and inform decarbonization actions across infrastructure, procurement, travel and operations.

Progress against climate objectives is monitored regularly, reviewed by governance bodies, audited by third-party auditors and disclosed transparently through Criteo's annual Sustainability Report.

Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

Sustainable infrastructure and operations

Criteo's infrastructure, particularly data centers and information technology equipment, represents a significant share of its environmental footprint. The Group integrates environmental considerations into infrastructure design, procurement and management, with a focus on energy efficiency, renewable electricity sourcing, and lifecycle impacts.

Criteo prioritizes the use of renewable electricity for its data centers and continuously evaluates opportunities to improve energy performance, reduce cooling requirements, and extend equipment lifespans. Environmental criteria are incorporated into infrastructure procurement processes and vendor selection.

Environmental considerations also extend to office operations, travel, and events. Criteo promotes energy efficiency, sustainable office practices and responsible travel choices through internal policies and employee engagement initiatives.

Resource management and circularity

Criteo seeks to minimize the use of natural resources and reduce waste across its operations. This includes monitoring water consumption where data is available, managing electronic waste responsibly and promoting circular practices for information technology equipment.

Criteo works with qualified partners to ensure that decommissioned equipment is reused, resold or recycled in a responsible manner. The company also engages employees through awareness programs and communities focused on environmental responsibility.

Environmental considerations in products and services

Criteo recognizes the role its products and services play in shaping environmental impacts across the digital advertising ecosystem. The company integrates environmental considerations into product development and innovation, including efforts to measure and reduce the environmental footprint of its technologies.

Criteo continues to develop tools and methodologies that enable internal teams and clients to better understand and manage the environmental impacts associated with digital advertising campaigns.

V. Social responsibility

Criteo's social responsibility commitments focus on people, inclusion, human rights, and positive relationships with communities, clients and end users. These commitments are grounded in respect of people, fairness, and the creation of a safe and inclusive environment.

People, inclusion and well being

Criteo is committed to fostering a workplace where employees feel valued, respected, and supported. The Group promotes belonging and inclusion through dedicated policies, employee communities, and leadership engagement.

Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

Criteo works to ensure equal opportunities in recruitment, development and career progression, with a particular focus on increasing representation of women in technology roles and supporting people with disabilities.

Employee well-being is a priority, encompassing physical, mental and social health. Criteo provides programs and resources to support work life balance, health and safety, and employee engagement across its global workforce.

Skills development and talent management

Criteo invests in the continuous development of its employees through learning, training, coaching, and leadership programs. Skills development supports both individual growth and the company's ability to innovate and adapt in a rapidly evolving technology environment.

Talent management practices are designed to attract, develop, and retain diverse profiles, while fostering a culture of continuous learning and performance.

Human rights and fair working conditions

Criteo is committed to respecting human rights across its operations and value chain, in line with international standards such as the United Nations Guiding Principles on Business and Human Rights.

This commitment is reflected in Criteo's Human Rights Policy and Third-Party Code of Conduct. The company works to identify and mitigate human rights risks, including topics related to labor practices, discrimination, health and safety and freedom of expression, in its operations and value chain.

Relationships with communities, clients and end users

Criteo engages with communities through employee volunteering, donations of time and resources, and partnerships that support social impact initiatives.

Responsible relationships with clients and end users are central to Criteo's business model. The company is committed to transparency, fairness, and trust in its interactions, products, and services.

VI. Responsible business conduct and stakeholder engagement

Ethical conduct, integrity, and transparency are fundamental to Criteo's approach to responsible business.

Ethics and compliance

Criteo's Code of Business Conduct and Ethics defines the standards expected of all employees and guides ethical decision making across the organization. The company maintains policies and procedures to prevent corruption, conflicts of interest, and other forms of misconduct.

Docusign Envelope ID: E7D302E8-409D-8D84-8125-BC8AD6D6AD43

Compliance with applicable laws and regulations is a core expectation, supported by training, internal controls, and reporting mechanisms.

Data privacy, security and responsible advertising

Data privacy and security are central to Criteo's business and trust relationships with users, clients and partners. Criteo applies privacy by design principles across its products and technologies and maintains robust security practices to protect data.

Responsible advertising practices are supported through guidelines, internal governance structures, and a Product Ethics Committee, which reviews ethical considerations related to product development and use.

Responsible supply chain practices

Criteo expects suppliers and business partners to adhere to ethical, social, and environmental standards consistent with its values. Supplier expectations are communicated through the Third-Party Code of Conduct and assessed through due diligence and risk management processes.

Stakeholder engagement

Criteo engages with a broad range of stakeholders, including employees, clients, investors, suppliers, regulators, non-profits and industry partners. Stakeholder engagement supports the identification of priorities, the management of risks, and the continuous improvement of sustainability performance.

Engagement takes place through formal and informal channels, including surveys, dialogue, partnerships, and participation in industry initiatives. Feedback from stakeholders informs strategy development, policy updates and reporting.

VII. Monitoring, reporting and continuous improvement

Criteo monitors the implementation of this Policy through defined objectives, key performance indicators, and internal controls. Sustainability performance is reviewed regularly by management and governance bodies.

Criteo publishes and maintains its Sustainability Report on an annual basis to provide stakeholders with transparent information on sustainability performance and progress.

Continuous improvement is a core principle of Criteo's sustainability approach. The company regularly reviews its practices, benchmarks performance and adapts its strategy in response to emerging risks, opportunities and stakeholder expectations.

This Sustainability Policy is reviewed periodically to ensure its continued relevance, effectiveness, and alignment with Criteo's strategy, regulatory developments, and stakeholder expectations.

Any material updates to the Policy are subject to appropriate governance review and approval. The most recent version of the Policy is made available through Criteo's corporate communication channels.