Docusign Envelope ID: A600BE37-043E-81BE-81AB-2E6FC83D87E9



# MODERN SLAVERY STATEMENT 2026

Docusign Envelope ID: A600BE37-043E-81BE-81AB-2E6FC83D87E9

## I MODERN SLAVERY STATEMENT

This modern slavery statement (**"Statement"**) is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Criteo S.A. and its subsidiaries (**"Criteo"**) have taken to ensure that modern slavery is not taking place within our business or supply chain from 1st January 2025 to 31st December 2025.

In accordance with internationally recognized human rights standards, modern slavery is used here to refer to situations in which people are controlled and exploited in situations they can't escape due to threats or violence ("Modern Slavery"). This Statement therefore covers the following:

- human trafficking;
- forced labour;
- servitude; and slavery.

Criteo does not tolerate any form of Modern Slavery and is committed to acting ethically, with integrity, and transparently in all business dealings. We also are dedicated to putting effective systems and controls in place to safeguard against any form of Modern Slavery taking place within the business or our supply chain.

## II BUSINESS ACTIVITIES

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

Headquartered in Paris, France, Criteo employs 3,548 employees worldwide as of December 31, 2024 and is currently established in Armenia, Australia, Brazil, Canada, China, Cyprus, France, Germany, India, Italy, Japan, Romania, Russia, Singapore, South Korea, Spain, Sweden, the Netherlands, Turkey, United Arab Emirates, United Kingdom and the United States.

## III RESPONSIBILITIES

As an advertising technology company, Criteo recognizes that its Modern Slavery risks are more likely to be found along its supply chain. However, Criteo embeds respect for human rights throughout its business activities, and regularly reviews its internal practices in relation to its own operations (including employees and subcontractors) and its supply chain.

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

Docusign Envelope ID: A600BE37-043E-81BE-81AB-2E6FC83D87E9

## IV RISK ASSESSMENT AND DUE DILIGENCES

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

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

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

Finally, Criteo has received an Ecovadis scorecard which amongst other things carries out an audit to assess supplier's corporate social responsibility standards including health and safety, environment, ethics. Criteo received the bronze medal in 2025.[1]

## V OUR COMMITMENT

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

Criteo's Code of Business Conduct and Ethics (the "**Code**") and Third Party Code of Conduct (together, the "**Codes**") outline our expectations of our employees, sub-contractors, and suppliers. They make clear that we are committed to ensuring there is no form of unethical conduct in our supply chain or in any part of our business. Employees and suppliers are expected to comply with the Codes, as part of either their employment or supplier contracts. Further, all Criteo employees receive a mandatory e-learning during onboarding, focusing on the Code's key messages, with refresher training every two years. All Criteo's employees are responsible for complying with the Code, and related policies and procedures. Violation is subject to discipline, up to and including termination.

[1] https://ecovadis.com/solutions/ratings/

Docusign Envelope ID: A600BE37-043E-81BE-81AB-2E6FC83D87E9

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

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

Criteo encourages its employees, suppliers, subcontractors, and other third-party business partners to ask questions about the Codes and to report any issues, concerns, or suspicions of unethical conduct or violation of laws and regulations to their supervisor. The Codes instruct employees and third parties to immediately report any concerns about any issue or suspicion of wrongdoing to their supervisor.

In accordance with Criteo's Whistleblowing Procedure, employees and all third parties can also anonymously report concerns about any human rights issue or suspicion of wrongdoing through our Whistleblower Hotline at speakup@criteo.com or +1 866 865 9476, or via secure online form at https://www.openboard.info/CRTO/index.cfm. No reprisal or retaliatory action will be taken against any individual for raising concerns in good faith under the process laid out in the Whistleblowing Procedure. Criteo will investigate, address and respond the concerns and will take appropriate corrective action. The Whistleblowing channels can also be found on Criteo's intranet, or on the investor relations website.

## VI OUR PERFORMANCE INDICATORS

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

## VII APPROVAL

This Statement was acknowledged by the Board of Directors of Criteo S.A. and by the Board of Director of Criteo Ltd.

For and on behalf of Criteo S.A.:

Michael Komasinski
CEO of Criteo S.A.

Signé par :
Michael Komasinski
9B9ABB98C76B43F...

For and on behalf of Criteo Ltd.:

Ryan Damon
Director or Criteo Ltd.

DocuSigned by:
Ryan Damon
71662F750BEF42B...