

Non-Financial Performance Statement

2024

Criteo's Corporate Social Responsibility Report

February 2025

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Introduction

Message From the Chairwoman of the Board, Rachel Picard

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 CDP¹ 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

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

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 Komaskinski. 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

About This Report – Process for Elaborating the Corporate Social Responsibility (“CSR”) Report

Corporate Social Responsibility (“CSR”) has always been a part of who we are, long before Criteo issued its first annual CSR Report (the "CSR Report" or "Report") in 2016. We are proud of our culture that empowers our people to drive positive change. As Criteo advances toward ambitious commitments, CSR is deeply integrated into our values and actions across the organization. Our employees' deep commitment is the driving force behind our success in achieving our Diversity, Equity, and Inclusion (“DEI”), ethics, and environmental goals. These objectives shape our future growth and define the value we aim to create for society. We are excited to share our progress in this Report.

Beyond describing Criteo's CSR strategy, the Report highlights the progress we achieved in 2024. Compliant with Article L.225-102-1 of the French Commercial Code, it aligns with leading non-financial reporting standards, including the Sustainability Accounting Standards Board ("SASB")². The 2024 Report's structure anticipates the forthcoming Corporate Sustainability Reporting Directive ("CSRD")³ requirements, applicable to Criteo starting in the fiscal year ending December 31, 2025. It incorporates elements of the European Sustainability Reporting Standards ("ESRS"). Additionally, we are actively aligning our climate-related disclosures with the Task Force on Climate-Related Financial Disclosures ("TCFD") recommendations, reinforcing our commitment to comprehensive and transparent reporting.

This Report is established following a standardized annual process that starts with a materiality analysis⁴ to identify key CSR topics for the Company. We then conduct interviews with internal stakeholders to capture detailed insights on yearly progress and achievements. The process ends with the consolidation of full-year data, analysis and commentary, which is then reviewed by key stakeholders across the organization. Finally, this Report undergoes an external audit by an independent third party.

In this Report, Criteo S.A. is referred to as the parent company and together with its subsidiaries, collectively, as "Criteo," the "Company," the "Group," or "we."

For more information regarding the Report process, see "Methodological Note" at the end of this document.

² See Concordance Table with SASB standards in the Appendix.

³ Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU, as regards corporate sustainability reporting.

⁴ A materiality analysis is a process that enables a business to identify their most important areas to focus on so that they can be highlighted as a priority, as well as to understand which are of most concern to stakeholders and how they impact the business model (and vice versa).

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](#).

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

I. About Criteo

1. Our Activities and Business Model

Founded in 2005, Criteo S.A. is a French technology company, headquartered in Paris and listed on the Nasdaq Stock Market with a global presence. In 2007, we began our commercial activities in France and have since expanded our business into Western Europe, North America, and the Asia-Pacific region. Several acquisitions over the years, such as HookLogic Inc. in 2016, Mabaya in 2021 and Iponweb in 2022 have supported the company's growth and allowed us to steadily expand our offering and market presence.

Description of main activities, products, and services: 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.

The Criteo Commerce Media Platform: We have undergone a profound transformation, evolving beyond our previous identity as a multi-solution Commerce Media platform provider. Today, we are focused on delivering more specialized, innovative solutions that better serve the needs of our clients in an increasingly dynamic market. The Criteo Commerce Media Platform is the only unified platform that directly connects advertisers with retailers and publishers on the open internet. We offer marketers and media owners a single platform for first-party data-based marketing and monetization. Our platform provides a holistic suite of AI-powered solutions, leveraging 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 for our brand, 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:

On the demand side:

- **Commerce Max** is a Commerce self-service Demand Side Platform ("DSP") for brands and agencies, enabling media planning, and buying on retailer and open internet inventories, all with closed-loop product-level conversion measurement.
- **Commerce Growth** is a powerful, self-service performance marketing tool used by direct-to-consumer brands and their agencies to acquire and retain customers. It includes full-funnel Commerce Audience targeting from brand and product discovery in the upper funnel to traffic and customer acquisition in the mid-funnel, and retargeting and retention in the lower funnel. Commerce Audiences leverage our large-scale commerce data and AI-powered audience modelling technology to find shoppers who are likely to respond well to newly discovered brand offers or are already in-market for a given product or service.
- **Commerce Go** is Criteo's highly automated and next generation Commerce Growth tool set which allows advertisers to create and launch an optimally configured in five clicks.

On the supply side:

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

Challenges, trends, and opportunities: Criteo 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.

We will also continue to evaluate and execute on acquisitions, with a critical assessment on technologies and businesses that have the potential to accelerate our Commerce Media Platform strategy by enhancing, complementing, or expanding our strategic capabilities. These include our technology, marketing, monetization solutions, go-to-market, and Research & Development ("R&D") teams. Key criteria for acquisitions include demonstrated revenue traction and a proven value proposition for clients and partners. Our entrepreneurial culture, growth opportunity, global scale, financial profile, strong brand, and market position enable us to attract potential partners and acquisitions.

Key inputs and assets for Criteo:

Our clients: Our client base is serviced through a combination of direct and indirect approaches, including through brand agencies for large clients, and through performance agencies and resellers for midmarket clients. These

companies range from large, global, and diversified commerce companies to mid-sized regional companies. With Criteo Retail Media, we also serve consumer brand manufacturers, which we refer to as "consumer brands" or "consumer brand clients".

At the end of 2024, we had direct relationships with approximately 40% of our clients and the remaining 60% were held with advertising agencies or other third-parties on the Criteo Performance Media Solutions side of the business. Meanwhile, 33% of our Criteo Retail Media revenue came from agencies.

As of December 31, 2024:

- We served approximately 17,000 clients.
- We delivered 2 trillion targeted digital advertisements ("ads").
- We had exposure to over \$1 trillion in online sales transactions on our clients' digital properties.
- Our average client retention rate, which is measured on a quarterly basis, has been approximately 90% since 2011.

Employees and Human Capital Management: The well-being and success of our workforce come first, as we are driven by our core values of being “**Open, Together, Impactful**”. Our compelling employee value proposition, competitive compensation packages, and vibrant culture are essential in our ability to attract and retain talent. We are committed to offering an environment where employees are ensured equal job opportunities and have a chance for advancement.

All human capital management initiatives are overseen by the Board of Directors, confirming the importance of this topic to Criteo.

As of December 31, 2024:

- We had 3,541⁵ employees globally.
- 41% of our employees were women (1,449 women out of 3,541 employees).
- Over 24,468⁶ hours of training were delivered to our employees.

Infrastructure: Our ability to execute depends on our highly sophisticated software and hardware infrastructure. Our global infrastructure is divided into three independent geographic zones: the Americas, Asia-Pacific ("APAC"), Europe, Middle East, and Africa ("EMEA"). In each of these geographic regions, our services are delivered through data centers ("DCs") that support each respective region. We generally rely on more than one data center in any given region, and within large regions, the DCs are strategically placed in close proximity to our clients, publishers, and users. We use multi-layered security controls to protect the Criteo AI Engine and our data assets. The environmental performance of

⁵ This figure differs from the total headcount presented in our Annual Report on the Form 10-K because in the CSR Report we take into account "inactive" employees whereas inactive employees are excluded of the Annual Report on Form 10-K KPI. See the Methodological note at the end of this Report.

⁶ Sum of training hours related to instructor-led, online and coaching sessions.

our DCs has also become a key criterion when selecting providers, and we aim to keep reducing the carbon footprint of our infrastructure and overall activities in future years.

As of December 31, 2024, our global infrastructure includes:

- Approximately 36,500 servers spread through eleven processing data centers (and three network Points of Presence), which comprises 3,700 servers hosting 1.44 million processing cores, and which, altogether, has a storage capacity exceeding 260 petabytes and 1.8 petabytes of random-access memory.
- 100% of the CO2 emissions linked to data centers use are offset, either directly by the data center providers or through Criteo's own purchasing of Renewable Energy Certificates ("REC").

Research & Development: We invest substantial resources in research and development to maintain our leading position in Commerce Media. Aside from the walled garden platforms, we have one of the largest R&D teams in the AdTech industry and our Criteo AI Lab pioneering innovations in computational advertising. Our engineering group is primarily located in research and development centers in France, US, Canada, Cyprus, Germany, and Armenia. We expect to continue to expand our technological capabilities in the future and to invest significantly in continued R&D and new solutions.

As of December 31, 2024:

- 1,089 employees were part of the R&D and product teams.
- R&D expenses, including expenses related to the Product group, totaled \$279.3 million.
- Aside from the walled garden platforms, we have one of the largest R&D teams in the AdTech industry.

Privacy, Data Protection, and Content Control: Privacy and data protection laws play a significant role in our business. The regulatory environment for the collection and use of consumer data by advertising networks, advertisers and publishers is frequently evolving in the U.S., Europe and elsewhere. The U.S. and foreign governments have enacted, considered or are considering legislation or regulations that could significantly restrict industry participants' ability to collect, augment, analyze, use and share personal data, such as by regulating the level of consumer notice and consent required before a company can utilize cookies or other similar technologies.

Financial results as of December 31, 2024:

- Our revenue was \$1,933 million.
- Our Gross Profit was \$983 million.
- Our contribution ex-TAC was \$1,121 million.
- Our net income was \$115 million.
- Our adjusted EBITDA was \$390 million.

More information regarding Criteo's activities, governance, financial performance, and results for 2024 is available on the Company's website for investors [here](#).

2. Our Corporate Governance

Board Diversity

Our corporate governance framework enables our Board of Directors and management to pursue our goals and strategic objectives in maximizing long-term shareholder value. The Board of Directors is committed to strong corporate governance and continuously seeks opportunities for improvement. Every year, the Board of Directors leverages different sources to enhance our corporate governance framework: shareholders' feedback from the annual general shareholders meeting, the Board of Directors and committees' self-assessments, governance best practices, and regulatory developments.

Under French non-discrimination law, our Board of Directors is prohibited from nominating a candidate for appointment solely on the basis of her or his origin, sex, cultural practices, sexual orientation, age, family situation, genetic characteristics, or to his/her actual or presumed belonging to an ethnic group, a nation or a race, among other factors. As a result, our Board of Directors reviews a variety of factors including gender identity, demographic background, professional experience, skills and education when evaluating candidates for nomination or renomination to the Board of Directors.

Since April 2018, we have been in compliance with the French Law requiring that our Board of Directors be composed of no less than 40% men or women, respectively.

For more information on corporate governance practices and Board Diversity, please refer to our most recent [Proxy Statement here](#).

Risk Oversight

Our Board of Directors, together with the Audit Committee, is primarily responsible for the oversight of our risk management activities. The Board of Directors oversees the Company's guidelines and policies for risk assessment and management, including major financial, data privacy, and cybersecurity risks, as well as measures to address these exposures and manage contingent financial liabilities.

While our Board of Directors oversees risk management, our management is responsible for day-to-day risk management processes. Our Board of Directors expects our management:

- To consider risk and risk management in each business decision
- To proactively develop and monitor risk management strategies
- To process day-to-day activities to effectively implement risk management strategies adopted by the Board of Directors

For more information on risk management, please refer to our [2024 Proxy Statement here](#).

3. Our 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 culture⁷ 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.

More information about our values is available [here](#).

Criteo's Code of Business Conduct & Ethics also embodies the Company's core values and ethical commitments, guiding its approach to employees, communities, clients, and other stakeholders. It underscores Criteo's dedication to Corporate Social Responsibility (CSR), positioning CSR as a business priority. The Code reflects a company-wide commitment, emphasizing that achieving its goals relies on the active engagement of all employees.

More information about our Code of Business Conduct & Ethics is available in the "Governance - Section VII.1" section of this Report.

In 2023, Criteo launched a new framework called "**Criteo Leadership Behaviors**" focused on empowering employees to influence, lead, and boost the Company's growth and success.

It conveys three key messages:

- Leadership at Criteo is about influence, not position.
- Everyone is a leader.
- Unique contributions do matter.

The new Criteo Leadership Behaviors framework focuses on six key behaviors shaping our common leadership culture:

- **Client-centricity:** "We drive impact through the way we partner."

We team up with our clients, so we can succeed together. We define success as a win-win situation, always aiming to provide outstanding services to both internal and external clients.

- **Recognition:** "We bring value through our words and actions and recognize impact. This is how we grow, together."

⁷ Our Culture Book is available [here](#).

We take the time to make sure that our contributions are recognized. We support and celebrate each other regularly. We do so in diverse ways that best reflect our individual needs, and this is what motivates and inspires us to be impactful.

- **Innovation:** "Alone, we open new doors. Together, we move mountains and create."

We welcome bold minds with open arms to break new ground together. We nurture creativity while learning from experience, continuously improving day by day to foster innovation.

- **Trust:** "In openness we trust."

We strive to make ourselves worthy of each other's trust. We understand that trust is not a given, it needs to be earned. Respect, inclusion, and authenticity underpin our culture and the way we connect with each other to achieve success.

- **Execution:** "We do what we say. We say what we do."

When we commit, we deliver. We turn strategy into action to make a greater impact in everything we do.

- **Ownership:** "We aim for success. We own our impact. We grow through experience."

We hold ourselves accountable and support each other without pointing fingers. We assess risks, we leap, and we learn by doing – all while supporting each other throughout the process.

4. Our Approach to CSR

a. *Main CSR Stakes and Materiality Analysis*⁸

Main CSR Stakes for Criteo

Criteo performed its first dedicated CSR risk assessment in 2018. We identified key CSR-related stakes by benchmarking our industry and conducting interviews with internal stakeholders collaborating with the sustainability team. These stakeholders assessed and prioritized critical issues, resulting in the identification of eight core CSR topics.

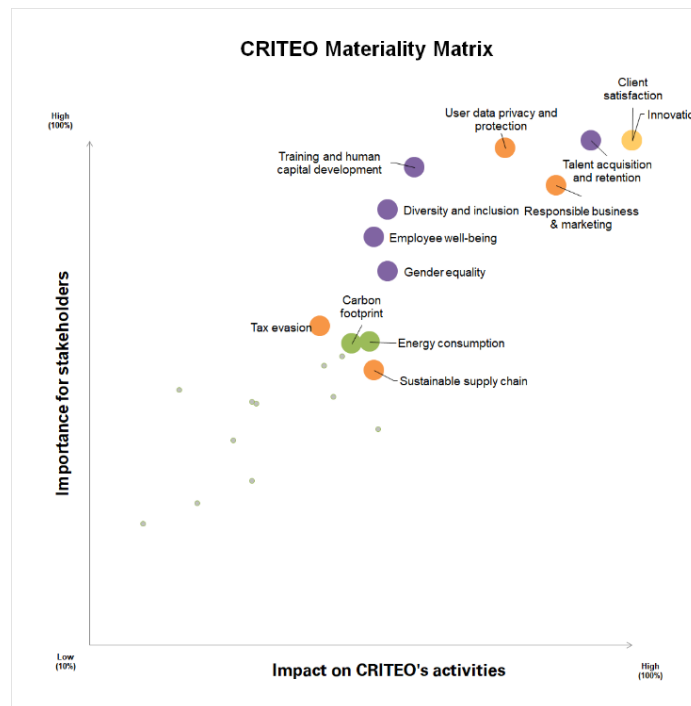
In 2024, we reviewed the alignment of our CSR risk strategy with the Enterprise Risk and Corruption Risk frameworks, working closely with the internal audit, risk, and compliance teams.

Materiality Analysis

Criteo conducted its first materiality analysis in 2019 using the initial CSR materiality assessment. Since then, we have updated this analysis by engaging with both internal and external stakeholders.

⁸ As indicated in the "Disclaimer" section, 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 laws or as used in the context of financial statements and reporting.

During these updates, stakeholders were asked to evaluate the importance and relevance of CSR topics related to Criteo's activities. By combining the insights from these interviews with the CSR issues identified in the initial materiality analysis, we established our materiality analysis presented hereinafter.



In 2021, we launched an online **CSR survey** to better understand our external stakeholders' CSR expectations. Different stakeholders participated, including clients, suppliers, publishers, investors, analysts, and agencies. The priorities they identified align closely with our materiality analysis, with the top five CSR topics being:

- User data privacy and protection
- Client satisfaction
- Employee well-being
- Responsible business and marketing
- Talent acquisition and retention

This Report outlines Criteo's policies, initiatives, and KPIs related to each of these key CSR issues, as detailed in the sections below:

CSR Theme	Material CSR topics	Section
Environmental impact	Energy consumption	Environment-Section II
	Carbon footprint	Environment-Section II
Talent acquisition, development, and well-being	Talent acquisition and retention	Social-Section III
	Training and human capital development	Social-Section III
	Employee well-being	Social-Section III
	Inclusion, diversity, and gender equality	Social-Section IV
Relation with clients	Client satisfaction	Social-Section V
	Innovation	Social-Section III
Business conduct & ethics	User data privacy and protection	Social-Section V
	Responsible business and marketing	Social-Section V
	Sustainable supply chain	Environment-Section II
	Global tax compliance	Governance- Section VI

As part of our upcoming obligations for non-financial reporting, the Group will fall under the scope of the CSRD starting from the fiscal year of 2025, and we have already initiated the compliance process. These ongoing efforts include completing our double materiality analysis, which involves identifying and thoroughly assessing Environmental, Social, Governance ("ESG") related risks, opportunities, and both the positive and negative impacts associated with our activities. The results of this analysis, which incorporates insights from internal experts and external stakeholders, will be presented in our 2025 sustainability report.

b. Our Approach to CSR

Criteo is committed to continuous improvement and generating a positive impact across all areas of CSR, prioritizing environmental sustainability and 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

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" (see "Environment - Section II" section of this Report). 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.

More information is available in the "Environment - Section II" section of this Report.

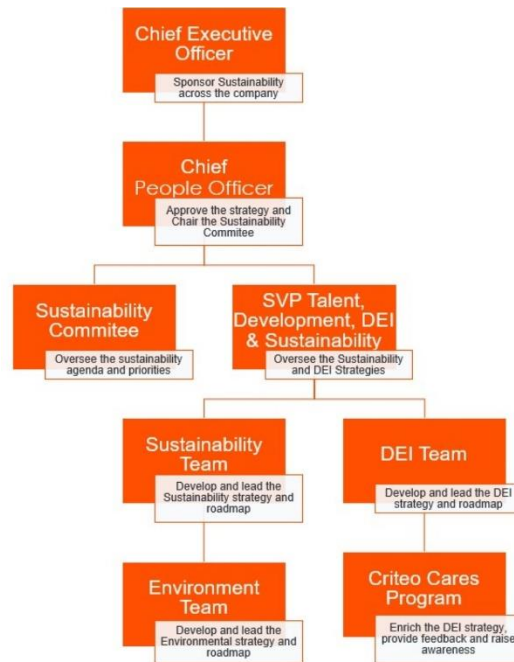
Diversity, Equity, and Inclusion

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 six of our Employee Resource Groups ("ERGs"), introduced later in this Report (see "Social - Section IV" section of this Report). The definition of each word of DEI is as follows:

- **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

More information is available in the "Social - Section IV" and "Social - Section V" sections of this Report.

c. Our 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. 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.

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.

d. Relationships with Stakeholders

Our Stakeholders

Dedicated teams maintain relationships with internal and external stakeholders through various channels. Criteo's main stakeholders include:

- Employees
- Clients, prospective clients, and publishers
- Investors and shareholders
- Technology partners, suppliers and subcontractors, and data-center operators
- Non-governmental organizations (NGOs)

We also engage with other categories of stakeholders through actions and initiatives not detailed in this Report. These stakeholders include public authorities and regulatory bodies, start-up networks, industrial associations and professional networks, journalists and media influencers, research centers and labs, employee representatives and unions, banking partners, financial analysts and influencers, schools, job applicants, and partner non-profit organizations.

Our management team and our IR team are actively engaged with the investment community. In 2024, we participated in 25 investor conferences and non-deal roadshows.

Our comprehensive IR [website](#) contains presentations, webcasts, financial information, press releases, and other information about Criteo that investors may find useful. To drive further awareness of our CSR efforts, we increased our company's website disclosures to highlight important actions and commitments around key topics such as DEI and the reduction of our environmental footprint.

In addition, we updated certain terms of our €407 million syndicated credit facility to a sustainability-linked credit facility ("Amended Credit Facility") in November 2023. Certain terms and conditions of our Amended Credit Facility are now linked to our sustainability goals to increase the representation of women in Tech roles and reduce our GHG emissions.

Shareholders can reach the IR team directly by sending an email to investorrelations@criteo.com.

Disclosing Our Impact

As part of our ongoing commitment to transparency and in keeping with investor expectations, we are focused on enhancing our ESG reporting. We have already adopted the SASB reporting framework⁹, responded to the CDP

⁹ See our SASB concordance table in the Appendix.

Climate Change questionnaire, and aligned with recommendations from the TCFD as shown in the appendix of this Report.

In 2024, Criteo once again responded to the EcoVadis questionnaire, addressing growing demands from our clients for visibility and transparency regarding our CSR practices. Benchmarking Criteo's CSR performance with other players in the industry helps refine our internal strategies and identify areas for progress. Thanks to the efforts made over the past year, Criteo maintained its score and was awarded the silver medal.

e. Key Results and Objectives

Criteo defined a set of CSR objectives that guide the main projects and initiatives we are conducting or plan to implement in the future. The tables below summarize our CSR objectives as of 2024.

Environment:

CSR topic	Ambition	Target	2024	2025	Section
Environmental Strategy	Define an Environmental Strategy and Action plan	Identify and implement actions to reduce our environmental impact	Achieved	Pursuing action in 2025	Environment - Section II. Reduce Criteo's Environmental Impact
		Publish an Environment Statement and Policy	Published. Criteo's Environment policy is available here	Continue to uphold our Environmental Policy and drive meaningful progress toward achieving our targets	Environment - Section II. Reduce Criteo's Environmental Impact
GHG Assessment		Publish Criteo GHG category emission	Published	Pursue its publication	Environment - Section II. Reduce Criteo's Environmental Impact
		Measure Criteo's annual carbon emission (scope 1, 2, 3)	Achieved through our partnership with SWEEP	Continuing annual measurement of Criteo's carbon emission	Environment - Section II. Reduce Criteo's Environmental Impact
		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	Environment - Section II. Reduce Criteo's Environmental Impact
		Align with the SBTi targets: Scope 2 - continue active annual sourcing of 100% renewable electricity through 2030	Achieved	Progressing in line with our targets	Environment - Section II. Reduce Criteo's Environmental Impact
		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	Environment - Section II. Reduce Criteo's Environmental Impact

CSR topic	Ambition	Target	2024	2025	Section
Data Centers (Infrastructure) and Offices	Reduce the carbon footprint of our Data Centers	Use 100% of renewable energy to power our DCs	Achieved	Maintaining 100%	Environment - Section II.2. Environmental Impact of Data Centers and Hardware
	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	Environment - Section II.2. Environmental Impact of Data Centers and Hardware Environment - Section II.3. Environmental Impact of Offices and Travel
	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	Environment - Section II. Reduce Criteo's Environmental Impact
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	Environment – Section II. 3.e. Environmental impact of subcontractors and suppliers
		Improve EcoVadis rating by the end of 2025	Earned the silver medal in 2024 (68/100 points)	Pursuing an improved rating	Introduction - Section I.5. Awards and Recognitions

Social:

CSR topic	Ambition	Target	2024	2025	Section
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	Social -Section V.2.Diversity, Inclusion, and Equal Opportunities
	Increase the share of women in Management	Increase the percentage of women being promoted (respecting proportionality principle)	41% in 2024	Maintaining 40% and above	Social -Section V.2.Diversity, Inclusion, and Equal Opportunities
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	Social -Section V.2.Diversity, Inclusion, and Equal Opportunities
	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	Social -Section III. Supporting People Development and Talent Initiatives
Employee Engagement (Criteo Cares Program)	Increase employee engagement within the community groups	Increase the number of employees involved in (at least) one community group	58% in 2024	Maintaining 40% and above	Social -Section IV.Presentation of the Criteo Cares program
	Deploy the volunteering platform (Giving by Alaya/Benevity)	Increase the number of employees with an account	73% in 2024	Maintaining 55% and above	Social -Section IV.Presentation of the Criteo Cares program
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	Social -Section III.5.Skills Management & Development

CSR topic	Ambition	Target	2024	2025	Section
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	Social -Section V2.h.Non-discrimination and Prevention of Harassment
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	Cf. Criteo's Proxy Statement (link is available in "Social -Section III.3. Compensation and Benefits")
Benefits	Transparency on our remunerations	Disclose the overall remuneration of the CEO compared to the average employee	Achieved	Pursuing action in 2025	Cf. Criteo's Proxy Statement (link is available in "Social -Section III.3. Compensation and Benefits")

Governance:

CSR topic	Ambition	Target	2024	2025	Section
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	Introduction - Section I.4-c. Our Sustainability Governance and Dedicated Teams

f. Contribution to Sustainable Development Goals ("SDGs")

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 contributions¹⁰ to the **United Nations' 2030 Sustainable Development Goals (SDGs)**, an internationally recognized framework for sustainability (see the concordance table in the Appendix).

¹⁰ Criteo's commitment to the SDGs, particularly towards SDG 4, 5, 8, 9, 10, 12, 13, and 17, is available in Appendix 2.

5. Our Awards and Recognitions

2022: Ragan Awards: winners in Global Diversity, Equity, and Inclusion Commitment and CSR / ESG Engagement Communication

2022: Top 50 Inspiring Workplaces (NOAM): ranked #12

2022 & 2023: Family Friendly Company label (France)

2023: Best Employer Glassdoor

2023: Strategies Grand Prix for the Best Company event

2023: Best Global Culture Comparably

2023: Best HR Team Comparably

2023: Bloomberg Gender – Equality Index member

2023: Diversio Diversity, Equity, and Inclusion Certification Level 1 – "Inclusive Employer"

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

2023: Sunday Times Best Workplaces – Medium Size Workplace

2023: EcoVadis Silver Medal (68/100)

2023: CDP Climate Change (C)

2023: 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 TechAwards – "Disability Inclusion"

2024: Women in TechGlobal Awards – "Diversity and Inclusion Employer of the Year"

2024: Ragan's CSR & Diversity Awards:

- Winner: Global Diversity, Equity and Inclusion Commitment
- Honorable Mention: Employee Resource Groups and Event

More information regarding our CSR and DEI awards is available [here](#).

Environment

The table below provides an overview of the main environment-related policies in Criteo.

Name	Policy content	Scope/exclusions	Accountability	Third-party standards/initiatives (if applicable)	Interests of stakeholder (if applicable)	Policy availability (if applicable)
Infrastructure Sustainability Procurement Policy	Sustainable practices to adopt in the procurement processes for infrastructure activities	The whole group	CFO	R2 recycling, ISO 14001	Procurement team	Internal purpose only
Sustainable Procurement Policy	Rules and guidelines for the purchase of goods and services from General Vendors	The whole group	CFO	SBTi	Procurement team, corporate legal team, IT team, security team, CSR team	Internal purpose only
Sustainable Travel Policy	Procedures and processes for the reimbursement and accounting of expenditures relative to travel	The whole group as well as any contractors or consultants performing work for hire expressly for Criteo	CFO	N/A	Procurement team, travel team	Internal purpose only
Global Environmental Policy	Outlines Criteo's commitment to environmental stewardship and sets forth the objectives and guidelines for conducting the business in an environmentally responsible manner	The whole group	Chief People Officer	SBTi	Infrastructure team, procurement team, IT team, facilities team, and finance team	Shared internally and published on the Company website

II. Reduce Criteo's Environmental Impact

1. Criteo's Approach in Addressing Climate Change

Environmental Strategy and Initiatives

Defined in 2022, our environmental strategy 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 DCs, 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. By fostering a proactive attitude and a sense of ownership, we encourage all our leaders to view environmental sustainability not only as a responsibility but also as a key driver of new business opportunities.

The most recent Sustainability Committee meeting, held in Q4, featured the presentation of sustainability goals for 2025. During the meeting, various teams (including R&D, infrastructure, product, legal, risk, finance, and IR) shared their own sustainability initiatives, all aligned with the broader sustainability roadmap.

In 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.

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. Our approach is based on the following objectives:

- Leverage our products, solutions, and services to build a sustainably conscious future
- Progress towards our GHG emissions targets, in accordance with the Paris Agreement
- Contribute to global neutrality via projects to offset part of our residual GHG emissions

Criteo's Global Environmental Policy reflects our commitment to adopting industry best practices to reduce the environmental impact of our operations, addressing key issues such as:

- **Resource conservation:** We continuously seek opportunities to conserve resources, reduce waste generation, and promote efficient use of energy, water, and other natural resources.
- **Carbon emissions reduction:** We are committed to reducing our carbon footprint and mitigating the impact of our operations on climate change.
- **Sustainable products and services:** We integrate environmental considerations into the development, design, and delivery of our products and services.
- **Supplier engagement:** We collaborate with our suppliers to promote sustainable practices throughout our supply chain.
- **Employee awareness and engagement:** We raise awareness among our employees about environmental issues and empower them to contribute to our sustainability goals.
- **Continuous improvement and reporting:** We regularly review our environmental performance and set targets for improvement.
- **Environmental management systems:** We establish and maintain effective environmental management systems to ensure the implementation of this Policy and facilitate continuous improvement.

More information on Criteo's Environmental Policy is available [here](#).

Criteo also participates in leading initiatives that aim to reduce the Tech industry's environmental impact, such as the **Alliance Digitale**¹¹: this leading industry trade body in France organizes working groups in Europe to measure the environmental impact of digital advertising campaigns and develops solutions to mitigate their inherent risks. In 2023, IAB Europe¹² introduced a standardized framework for measuring the carbon footprint of advertising campaigns.

For several years now, Criteo has recognized the increasing expectations from regulators and public opinion regarding the reduction of environmental impact within the digital advertising sector.

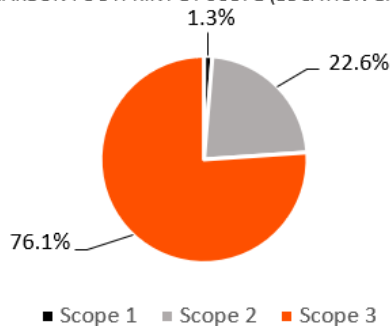
Criteo's Carbon Footprint

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.

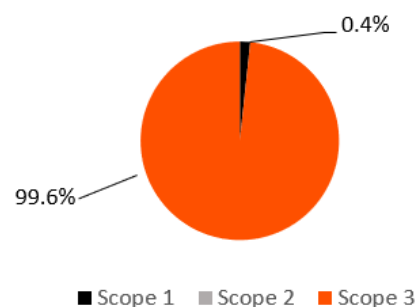
We have since deployed the SWEEP software to facilitate the collection and centralization of data, and thus make the reporting process of our carbon emissions more exhaustive. This tool enables us to cover emissions from the entire value chain, reusing the calculation methodologies developed during the first assessment, updating and supplementing them where necessary. Thanks to the SWEEP software, we can better monitor our carbon footprint results against the SBTi targets we have set this year. This helps us check and anticipate the impact of our decarbonization levers.

The trends and results achieved in 2024 are presented in the graphs and tables below.

2024 CARBON FOOTPRINT BY SCOPE (LOCATION-BASED)



2024 CARBON FOOTPRINT BY SCOPE (MARKET-BASED)

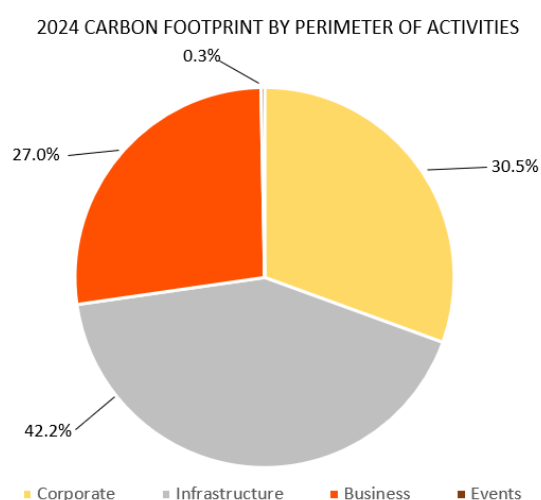


¹¹ Alliance Digitale, formerly named "Interactive Advertising Bureau France" ("IAB France").

¹² Interactive Advertising Bureau, an European-level association for the digital marketing and advertising ecosystem.

Criteo's carbon footprint results by scope			
Scope	2023 (N-1 - in tCO ₂ eq)	2024 (N - in tCO ₂ eq)	N/N-1 evolution
Scope 1	472	1,024	+117%
Scope 2 – Location-based	24,730	17,688	-28%
Scope 2 – Market-based	0	0	N/A
Scope 3	111,462	59,555	-47%
Total CO₂ emissions (scopes 1 + 2 + 3) - Location-based	136,664	78,268	-43%
Total CO₂ emissions (scopes 1 + 2 + 3) - Market-based	111,933	60,579	-46%

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).



Criteo's carbon footprint results by perimeter of activities			
Perimeter	2023 (N-1 - in tCO ₂ eq)	2024 (N - in tCO ₂ eq)	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)	136,664	78,266	-43%

As the results show, 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.

In 2022, Criteo published its Greenhouse Gas Emissions Report ([BEGES](#)) on the French Agency for the Ecological Transition (ADEME) website, based on the full carbon footprint calculated for 2021 and presented above (more details [here](#)). We will repeat this process regularly, as required by Article L 229-25 of the French Environment Code (more details [here](#)).

Climate Reporting Frameworks

We are committed to communicating with our stakeholders in a clear and transparent way, based on tangible elements that have been co-constructed and/or verified by external experts. Our reporting is grounded in national and international frameworks, ensuring the information we communicate is consistent, reliable, and comparable.

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 (see the concordance table in the Appendix).

2. Environmental Impact of Data Centers and Hardware

Energy Consumption and GHG Emissions due to Data Centers

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 DCs, all owned by external service providers. This network includes 11 data processing centers and three 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). A dedicated capacity planning team ensures the efficient allocation of infrastructure resources to align with business objectives. Their full-time focus is on optimizing Criteo's infrastructure for both cost-effectiveness and energy efficiency.

Relocation and Rightsizing

As part of a continuous effort to reduce emissions, Criteo relocated several DCs in 2024. DCs identified with high emissions during our 2023 environmental analysis were particularly targeted for these relocations. For instance, the data center that centralizes data and performs computations for the entire world has been relocated from Amsterdam to Paris due to a better energy mix.

As part of our efforts to reduce the environmental impact of DCs, unused servers and machines in inventory are shut down. This practice represents around a 3% saving of our annual power electricity consumption. For maintenance reasons, these machines may be briefly switched on once a week to ensure their ongoing functioning, but otherwise remain off.

Beyond energy efficiency, Criteo takes a comprehensive approach to minimizing the environmental impact of its server infrastructure by considering its entire lifecycle footprint. To this end, Criteo conducts a specialized GHG assessment specifically focused on the complete lifecycle of its infrastructure in addition to the company-wide assessment already conducted (more information later in the Report). The results of this assessment guide us in defining the most sustainable approach.

Working with Our Vendors

Criteo actively seeks to enhance sustainable practices among vendors of services (hosting and hardware recycling) as well as hardware procurement. For this purpose, we 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 (see the "Suppliers and Subcontractors" section for more information).

For each new project, Criteo issues a Request for Proposal ("RFP"), where sustainability is a decision-making criterion. This includes evaluating energy-saving processes, energy sources for the DCs, power usage effectiveness ("PUE")¹³ which shouldn't exceed a rate of 2, providers' sustainability strategies or programs, certifications, and other related factors. For instance, all DCs utilized by Criteo are covered by international certifications related to energy efficiency¹⁴ and the hardware devices we procure require open-source possibilities to avoid software end-of-life limitations and increase hardware repairability and spare part availability.

We also focus on performance per watt (QPS/Watt) when selecting servers. We have a benchmarking tool to test actual server consumption and measure computing power relative to electricity use.

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 CO ₂ emissions in DCs	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%
CO ₂ emissions generated by DCs (post offsetting efforts) ¹⁵	0 tCO ₂ eq	0 tCO ₂ eq	0%

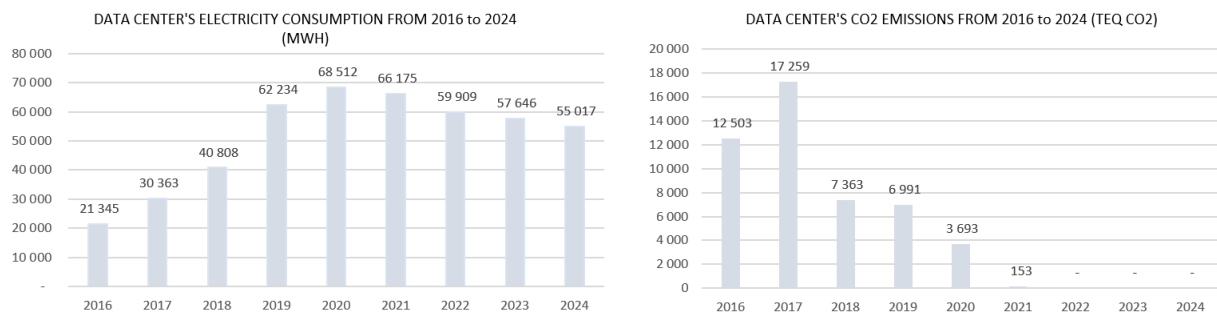
¹³ PUE is the ratio between the total electricity consumed by the Data Center and the electricity consumed specifically by the servers, meaning that if a Data Center has a PUE rate of 2, it consumes the same amount in auxiliary utilities (cooling, lighting, etc.) as the core consumption of computing devices.

¹⁴ LEED, U.S. EnergyStar, ISO 50001, ISO 140001, ISO45001:2018, SS564:2010, BCA-IMDA.

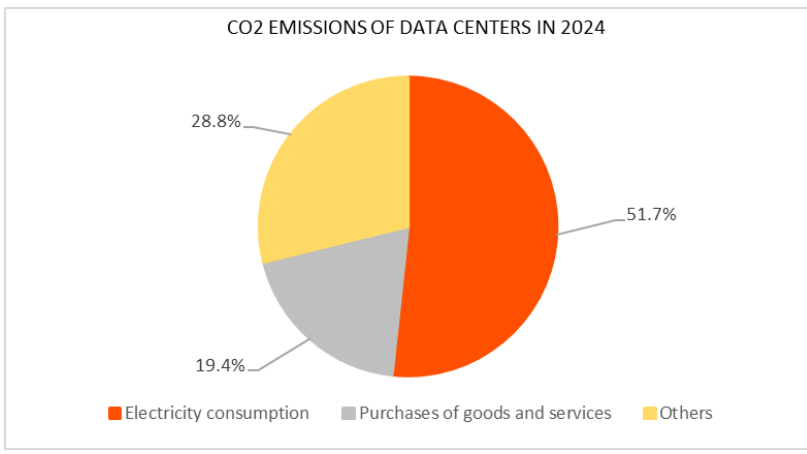
¹⁵ Regarding the calculation method of CO₂ emissions, for DCs totally powered with renewable energy or for where we use RECs to offset emissions, the emissions are considered to be zero. For the other DCs the local factor is used (for more details, see methodological note).

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 CO₂ 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 RECs. While the type of energy certificate varies by region, we ensure that they match both the geographic location and timing of energy consumption. For instance, for electricity consumed in Virginia, U.S., we purchase certificates sourced from the same region, aligned with monthly consumption patterns.



According to Criteo's specific GHG assessment for the entire lifecycle of its IT Infrastructure, emissions are distributed between Scope 2 (power usage) and Scope 3 (manufacturing and end-of-life), accounting for 52% and 48% emissions, respectively, in 2024.



The perimeter of each emission category is defined below¹⁶:

- 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

¹⁶ 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.

- Others: all other topics related to the data center such as network, bandwidth, cables, fibers, and waste

3. Environmental Impact of Offices and Travel

a. Green Offices

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 LEED¹⁷ or BREEAM¹⁸. Thus, many of our offices were built according to high environmental quality building norms. In 2024, we renewed the lease for our New York (U.S.) office, located in an Energy Star-certified building, following a detailed analysis comparing its energy performance to similar buildings in similar climates. The building's landlord is dedicated to sustainable business practices, including actively planning efficiency upgrades to meet Local Law 97 compliance, ensuring long-term business sustainability.

In 2024, **green certifications** covered about 77% of our leased office spaces, calculated by total office area in square meters (compared to 66% in 2023).

The issues that are managed by the landlord, such as waste management or heating for example, are also elements that Criteo considers. The environmental performance of the buildings has thus become one of the decision factors for Criteo.

b. Optimizing Use of Office Space and Real Estate Footprint

We have optimized workspaces around the world to better align with usage and sustainability goals. For example:

- Iponweb office lease in New York, U.S., previously sublet, was fully surrendered upon its expiration in August 2024.
- The office lease in Bordeaux, France was also surrendered due to low usage.
- In 2024, the teams in London, U.K. and Munich, Germany transitioned to a managed or coworking space, offering shared amenities which improved sustainability.

All workspace modifications are implemented in consultation with employees and informed by behavioral studies to ensure that they can continue to work under optimal conditions.

¹⁷ Leadership in Energy and Environmental Design.

¹⁸ BRE Environmental Assessment Method.

In locations where Criteo does not have dedicated workspaces (leased offices or co-working spaces), we introduced a space-on-demand program through the whole-workplace solution for distributed work, called "Upflex". Under this program, Criteo employees have access to a wide range of co-working spaces where they can reserve desks, meeting rooms, phone booths, and private offices. This flexibility allows them to work from home when needed, helping to reduce their commuting time and carbon footprint. Additionally, every time an Upflex space is booked, Upflex pledges to plant a tree in partnership with Trees for the Future¹⁹.

c. Energy Consumption due to Offices

Criteo strives to reduce the energy consumption of offices through a variety of measures, including:

- Automatically switching lighting off at night or relying on motion sensors
- Using energy-efficient LED lighting
- Configuring all laptop's default settings to enter sleep mode when unused and low-battery mode (lower energy consumption) when unplugged
- Automatically shutting off or reducing air-conditioning during the evening after regular working hours in several offices
- Setting heating, ventilation, and air conditioning in major offices such as New York, U.S. and Tokyo, Japan, to run during reasonable working hours at an adequate and energy-efficient preset temperature

A key initiative has been transitioning to renewable energy wherever feasible. For example, our Berlin office in Germany, currently reliant on natural gas, will be relocated to a more sustainable coworking space in February 2025 once the lease is up, enabling a shift from natural gas to district heating. In Ann Arbor, Michigan, U.S., recent renovations led to the decision to retain the office despite its ongoing reliance on natural gas; however, we remain dedicated to expanding renewable energy use at this location. Besides, our new office in Bucharest, Romania is completely supplied with electricity, which demonstrates the efforts made by our workplace team to reduce scope 1 emissions.

Electricity consumed in offices	2023 (N-1)	2024 (N)	Var. (N/N-1)
Total office electricity consumption	1,590 MWh	1,723 MWh	+8%
Total per employee	0.44 MWh/employee	0.5 MWh/employee	+14%
% from renewable energy sources	29%	31%	+2%

d. GHG Emissions due to Offices and Travel

Criteo is dedicated to reducing both frequency and environmental impact of business travels.

¹⁹ More details on Trees for the Future can be found [here](#).

Criteo actively minimizes GHG emissions by limiting air travel whenever possible and prioritizing video conferencing over in-person meetings. The Company also avoids providing company cars as part of employee compensation, and aims to reduce reliance on privately owned vehicles. Many Criteo offices are conveniently located near public transportation, facilitating sustainable commuting choices. To further promote these options, public transportation costs are subsidized in several locations.

In 2024, Criteo offset all emissions from business travel and hotel stays through VCS²⁰-certified credits in partnership with the non-profit Tree-Nation (see more details [here](#)).

CO ₂ emissions	2023 (N-1 - in tCO _{2eq})	2024 (N - in tCO _{2eq})	Var. (N/N-1)
From electricity and natural gas consumption (offices) – in tCO _{2eq}	462	706	+53%
From business trips – in tCO _{2eq} ²¹	4,744	7,026	+48%
From commuting – in tCO _{2eq} ²²	77	84	+9%
Carbon footprint per employee (offices consumption + business trips + commuting) – in tCO _{2eq} /employee	1.46/employee	2.4/employee	+64%

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.

4. Product Sustainability

Reducing the environmental impact of our products has always been a priority. 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.

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. Meanwhile, the product sustainability team is developing strategies, goals, and initiatives for 2025, including budget proposals and partnerships with business stakeholders, to effectively address evolving customer demands.

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

²⁰ Verified Carbon Standard CO₂ Certification. Learn more [here](#).

²¹ Business trips include business trips by plane and business trips by train.

²² More information is available in the methodological note at the end of this Report.

frameworks, such as common methodologies for calculating CO₂ emissions from campaigns. Criteo actively participates in about a hundred of these organizations, contributing to the development of industry-wide solutions.

5. Other Environmental Impacts

a. Environmental Impact of Subcontractors and Suppliers

Criteo is committed to building a network of reliable and responsible suppliers. To achieve this, the procurement team has developed a range of tools and processes over the years to enhance supplier selection and performance monitoring. These efforts include defining purchasing strategies, managing supplier quality, evaluating supplier performance, and conducting supplier risk analyses—all of which incorporate CSR criteria.

In 2017, Criteo introduced its Global Procurement Policy, which has been regularly updated and was replaced in 2023 by the **Sustainable Procurement Policy**. This new policy reflects Criteo's and the procurement team's dedication to embedding sustainability into supplier selection, fostering a more eco-conscious supply chain. It emphasizes integrating CSR considerations into procurement practices, strengthening risk management, clarifying procurement roles and responsibilities, and aligning suppliers with Criteo's sustainability goals. Additionally, as detailed earlier in this Report, the policy now includes an appendix focused on infrastructure sustainability procurement, further reinforcing Criteo's commitment to sustainable practices throughout its supply chains.

The sustainability objectives in this new policy are stated as follows:

- To minimize the environmental impacts of infrastructure activities
- To improve resource efficiency and reduce waste
- To achieve long-term cost savings through sustainable procurement practices
- To comply with relevant environmental laws and regulations

Similarly, our Travel policy was replaced in 2024 by a new **Sustainable Travel Policy**, which promotes sustainable travel practices among employees. This updated Sustainable Travel Policy outlines situations when air travel is prohibited and provides guidance on booking environmentally friendly hotels through our travel partner. In addition to outlining tangible actions for more sustainable travel, this policy also focuses on raising employee awareness about their responsibility to travel less frequently and adopt more sustainable practices.

These policies aim to provide a general framework for integrating more sustainability into our daily purchasing activities such as our RFP process.

All new RFPs automatically and systematically include a CSR assessment developed by our procurement team. This internal CSR assessment consists of 10 questions and is required if a supplier has no EcoVadis score or has a score below 50. Criteo also signed a partnership with [EcoVadis](#) in 2022 to work on defining the basis of its sustainable Procurement approach. The combination of our internal CSR assessment and the EcoVadis ranking allows a fair grading of suppliers based on sustainability. The CSR score assigned to suppliers' accounts for at least 5% of the final

overall scoring system. The weight of the CSR score can be higher than 5% depending on the vendor's critical level of the RFP.

The goal is to increasingly include CSR criteria into Criteo's vendor selection process and to engage our supplier network in this transition.

Our practices regarding sustainable procurement are strengthened and supported using a new Vendor Risk Management ("VRM") tool implemented in 2023. Since the launch of our VRM tool, 518 vendors have already been vetted, representing about 25% of our active vendors' base.

This tool is set to streamline, optimize, and secure the process of working with new vendors. The solution helped our employees navigate through the procurement process from project identification to contract signature and vendor onboarding. VRM is made to automate vendor analysis, ensuring adherence to our stringent CSR, finance, compliance, IT, security, and legal standards. This tool represents a significant step forward in efficiency and risk management for Criteo.

In accordance with the risk level, Criteo will require an appropriate action plan from the vendor if they are willing to keep working with Criteo.

In addition, Criteo's commitment to Health, Safety, and the Environment ("HSE") is demonstrated by our requirements during the tender process for data center space rentals. In particular, the Company expects potential suppliers to provide clear responses on their use of renewable energies, responsible procurement, and certification.

Regarding data compliance, the procurement team and the compliance team worked on a new version of the Third Party Code of Conduct. The Code of Business Conduct & Ethics is signed by suppliers based on their compliance risk assessment (available [here](#)).

b. Employees' Green Initiatives

Historically, Criteo has cultivated environmental responsibility through local employee-led initiatives. Since 2020, our sustainability efforts have expanded systematically across all business units and global operations through Criteo Cares (more information in the section "Presentation of the Criteo Cares program"), empowering employees to champion green practices. Learn more about the Green Community and environment at Criteo below.

Green Community

The Green Community aims to raise awareness of climate change and support the Company's transformation to a more responsible future. Our group of nearly 450 passionate volunteers is active throughout the year, and especially during eco-conscious celebrations such as Earth Day (in April) and Environmental Month (in September) at Criteo. In parallel, several [Climate Collage](#) sessions have been organized by Green Community active members in our Paris office.

Our Chief People Officer and Chief Technology Officer, both executive sponsors of the Green Community, regularly participated in community events such as clean-up missions and Earth Day talks.

Additionally, our community also developed awareness content such as the **Green Guidelines**, which provide tips for our employees to adopt environmentally friendly behaviors in the office, and the **Environmental Learning Path**, which provides our employees with valuable resources to tackle environmental challenges better. The Green Community was also instrumental in defining Criteo's environmental strategy (see "Environment - Section II-1").

The Environmental Learning Path includes a concise 5-minute training course designed for newcomers, introducing them to Criteo's environmental strategy, eco-friendly best practices, and opportunities to get involved in Criteo's initiatives. This module is part of the onboarding process, with plans to expand its content further.

c. Natural Resources Consumption and Waste Management

Natural Resources Consumption for Offices and Data Centers

In 2024, Criteo assessed the total water consumption of its DCs at approximately 40 million liters. 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-waste²³ 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. For example, when opening a new data center in Singapore, Criteo reused equipment from other locations, accounting for 69% of the servers required for the site.

In 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

²³ Electronic waste, or commonly called "e-waste", describes discarded electrical components or electronic devices.

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.

Social

The table below provides an overview of the main social-related policies in Criteo.

Name	Policy content	Scope/exclusions	Accountability	Third-party standards/initiatives (if applicable)	Interests of stakeholder (if applicable)	Policy availability (if applicable)
Learning and Development Policy	A comprehensive guide to the learning and development opportunities at Criteo, providing clarity on the process, guidelines, and expectations around these opportunities	All departments and levels of the organization, including full-time, part-time, fixed term contract employees, apprentices and interns	Chief People Officer	N/A	Employees, People Business Partners, direct managers	Internal purpose only
DEI Policy	A description of Criteo's vision and commitments regarding culture, diversity, and inclusion	Each person we interact with – including employees, clients, job	Chief People Officer	N/A	N/A	Shared internally and published on the Company website
Global Disability Policy	Commitment to fostering and supporting a diverse workforce, and to integrating equality opportunities for people with disabilities into Criteo policies, procedures, decisions, and operations	All employees and job applicants, any employee who becomes disabled during their employment at Criteo, anyone employed by outside agencies working on Criteo premises	Chief People Officer	N/A	N/A	Shared internally and published on the Company website
Human Rights Policy	Ensure that our products and services are provided in a way that respects, encourages and supports human rights	The whole group	Chief Legal Officer	United Nations Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights	Local management, people team, legal team	Shared internally and published on the Company website

Name	Policy content	Scope/exclusions	Accountability	Third-party standards/initiatives (if applicable)	Interests of stakeholder (if applicable)	Policy availability (if applicable)
Information Security Policy	Rules to be followed to ensure an appropriate level of security regarding information assets and related processes	The whole group, third parties interacting with Criteo (Fraud that did not result in the exploitation of an information technology breach or vulnerability is not in the scope of this policy)	Chief Technology Officer	N/A	CEO, Chief Information Security Officer, Information Security Council, information security team, internal audit & risk team, Data Privacy Officer, legal team, Chief Technology Officer, product team, client solutions team, Board of Directors, workplace team, data center team, people team	Shared internally

III. Supporting People Development and Talent Initiatives

Criteo operates globally with 40 offices²⁴ located throughout the Americas, EMEA, and APAC regions. In recent years, we have focused on nurturing our talent to support our transformation by investing in the growth and development of our current workforce of 3,541 employees.

1. Headcount

As of December 31, 2024, Criteo's global workforce stood at 3,541²⁵ employees, encompassing both permanent and non-permanent staff, a 2% workforce reduction compared to 2023.

The workforce-related figures presented in this Report refer to all entities within Criteo as of December 31, 2024, including legal entities acquired in the previous years.

²⁴ Offices, including coworking spaces:

- EMEA – Paris, Grenoble (Echirolles), Bordeaux, Barcelona, London, Munich, Berlin, Düsseldorf, Milan, Amsterdam, Madrid, Istanbul, Dubai, Stockholm, Moscow, Limassol, Yerevan, Nicosia, Tel-Aviv and Bucharest
- APAC – Gurgaon, Tokyo, Osaka, Singapore, Seoul, Beijing, Melbourne, and Sydney
- Americas – New York, Boston, Ann Arbor, Los Angeles, Chicago, Miami, Seattle, San Francisco, Portland, Palo Alto, Sao Paulo, Toronto, and Vancouver

Please note that one office can be occupied by several legal entities within Criteo (Criteo France SAS, Iponweb.). This list is based on the data provided by our workplace teams as of December 31st, 2024.

²⁵ This figure differs from the total headcount KPI presented in our Annual Report on Form 10-K because in this Report we take into account "inactive" employees whereas inactive employees are excluded of the Annual Report on Form 10-K KPI. See the Methodological note at the end of this Report).

Criteo opened an office in Romania in September 2024. Initially, we started with 8 employees, and by the end of December 2024, our headcount had grown to 18. Romania was chosen as a new location due to its strong IT talent pool, competitive costs, suitable location for business operations, as well as the presence of our contractors. We anticipate that Romania will evolve into a new hub for R&D.

CRITEO	2023 (N-1)				2024 (N)				Var.
Entity	Women	Men	Not declared	Total	Women	Men	Not declared	Total	(N/N-1)
APAC									
Criteo KK (Japan)	60	60	0	120	63	54	0	117	-3%
Criteo Singapore Pte. Ltd. (Singapore)	37	20	0	57	31	18	0	49	-14%
Criteo India Pvt Ltd. (India)	72	140	0	212	93	178	0	271	+28%
Criteo Korea Ltd. (South Korea)	30	29	0	59	32	27	0	59	0%
Criteo Australia Pty Ltd (Australia)	10	25	0	35	7	15	0	22	-37%
Criteo Advertising (Beijing) Co., Ltd (China)	9	5	0	14	12	4	0	16	+14%
AMERICAS									
Criteo Corp. (United States)	333	358	2	693	327	326	1	654	-6%
Criteo do Brazil LTDA (Brazil)	39	40	0	70	39	37	0	76	+9%
Criteo Canada Corp (Canada)	10	25	0	35	11	32	0	43	+23%
EMEA									
Criteo Europa S.L. (Spain)	304	292	4	600	308	310	2	620	+3%
Criteo Ltd (U.K.)	38	43	0	81	42	52	0	94	+16%
Criteo GmbH (Germany)	47	38	0	85	57	99	1	157	+85%
Criteo France SAS (France)	27	24	0	51	23	18	0	41	-20%
Criteo Technology (France)	288	635	1	924	284	633	1	918	-1%
Criteo SA (France)	15	9	0	24	11	8	0	19	-21%
Criteo S.R.L (Italy)	9	15	0	24	8	11	0	19	-21%
Criteo BV (Netherlands)	6	13	0	19	6	12	0	18	-5%

CRITEO	2023 (N-1)				2024 (N)				Var.
Entity	Women	Men	Not declared	Total	Women	Men	Not declared	Total	(N/N-1)
Criteo España S.L (Spain)	6	10	0	16	4	9	0	13	-19%
Criteo Rek Hiz ve Tic. AŞ (Turkey)	6	5	0	11	0	0	0	0	-100%
Criteo MEA FZ LLC (UAE)	3	3	0	6	5	5	0	10	+67%
Criteo Nordics AB (Sweden)	0	3	0	3	0	3	0	3	0%
ООО "КРИТЕО" [LLC CRITEO] (Russia)	0	1	0	1	0	1	0	1	0%
Mabaya (Doobe In Site LTD) (Israel)	12	21	0	33	12	22	0	34	+3%
Iponweb GmbH (Berlin)	14	62	1	77	0	0	0	0	-100%
Iponweb Inc. (New York)	18	19	0	37	0	0	0	0	-100%
Bidswitch GmbH (Switzerland)	0	0	0	0	0	0	0	0	N/A
Bidswitch Inc (U.S.)	0	0	0	0	0	0	0	0	N/A
Iponweb GmbH (CH) (Switzerland)	0	0	0	0	0	0	0	0	N/A
Iponweb Limited (U.K.)	2	15	0	17	0	0	0	0	-100%
Iponweb Labs Limited (Cyprus)	52	151	2	205	47	146	1	194	-5%
The MediaGrid Inc. (U.S.)	0	0	0	0	0	0	0	0	N/A
Iponweb Labs LLC (Armenia)	33	57	2	92	25	49	2	76	-17%
Brandcrush Pty Ltd. (Australia)	0	0	0	0	0	0	0	0	N/A
Criteo Technology SRL (Romania)	0	0	0	0	2	15	0	17	N/A
Total	1,480	2,118	12	3,601	1,449	2,084	8	3,541	-2%

As of December 31, 2024, the 1,449 women in our headcount represented 41% of the total workforce of 3,541 employees. Young people (below 35 years old) account for most of Criteo employees.

Workforce breakdown by age	2023 (N-1)	2024 (N)	Var. (N/N-1)
Under 25	133	92	-31%
Between 25 and 29	834	738	-12%
Between 30 and 34	1,091	1,088	0%
Between 35 and 39	791	805	+2%
Between 40 and 44	414	447	+8%
Between 45 and 49	207	224	+8%
50 and above	140	147	+5%
Total	3,610	3,541	-2%

2. Recruitment and Terminations

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.

Building an excellent R&D team has always been a critical challenge and a top business priority. To meet this need, R&D recruitment is managed by a specialized R&D talent acquisition ("TA") team. This team focuses on identifying, connecting with, attracting top-tier candidates, and converting them into qualified applicants. The R&D TA team collaborates closely with the TechHiring Guild²⁶, ensuring a rigorous and consistent process for assessing technical skills throughout the hiring process. The R&D team identifies and attracts candidates before they graduate through our Campus program.

In 2024, Criteo partnered with six colleges in France and participated in four career forums. Those events enable us to promote our activities directly to students, meet with candidates, collect resumes, and organize future interviews. In 2024, we established a new position within the recruitment team: a Global Campus Program Specialist based in France. This role is dedicated to enhancing our internship program by making it more global and better organized, ultimately improving the experience for both Hiring Managers and students during their internships.

²⁶ The TechHiring Guild is an internal group which consists of engineers and talent acquisition experts. This group meets every two weeks to challenge and continuously improve the recruiting process. Whether it's about the process flow, renewing coding exercises, improving the candidate experience, *etc.*

New Hires & Terminations	2023 (N-1)	2024 (N)	Var. (N-1/N)
New Hires	638	579	-9%
Terminations	768	648	-16%
Employee's initiative	374	307	-18%
Employer's initiative ²⁷	246	214	-13%
Other (e.g., end of fixed-term contract)	148	127	-14%

We diligently track our attrition rate and have intensified our efforts to gain deeper insights into it. To this end, we have developed a comprehensive database that allows us to analyze departure reasons and more accurately forecast attrition rates across different geographic regions and employee segments.

We make every effort to retain our employees by regularly monitoring their engagement rate and ensuring that they enjoy a flexible working environment that allows for their well-being, inclusion, and development (see in the following sections).

3. Compensation and Benefits

In the Tech industry, compensation is a critical differentiating factor if a company wishes to attract and retain talents and stand out from the competition.

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. This is enforced by Criteo's compensation and benefits team, who monitors the market and performs salary surveys for all components of employees' compensation. A yearly review of salary levels is conducted across the Company, ensuring that compensation abides by the Global Compensation Guidelines. The compensation and benefits team also oversees practices across Criteo' entities, considering country-level specificities with the help of local people teams.

In 2024, annual base and variable salary compensation payouts were €355,596,266.22²⁸.

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. Every year, Criteo leads a comprehensive analysis of salary levels across the Company. The purpose of this analysis is to assess the competitiveness of an employee's base salary compared to market equivalents and to identify any residual pay disparities between men and women.

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: for gender pay gap, the average compa-ratio is 0.91 for men and 0.90 for women before calibration.

²⁷ Including redundancies and restructuring.

²⁸ For all Criteo entities.

However, the 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 purview of our **Pay Parity Action Plan** is comprised of the following areas:

At hiring	At merit cycle	At promotion & mobility	After a leave of absence
<ul style="list-style-type: none"> - Ensure pay equity by running quarterly analysis on New Hire offers per gender - Training for managers 	<ul style="list-style-type: none"> - Ensure balanced performance rating distribution per gender - Ensure average increase is balanced between women and men employees based on performance 	<ul style="list-style-type: none"> - Ensure equal access to promotion and internal mobility opportunities - Perform analysis on average increase proposed during promotion based on gender 	<ul style="list-style-type: none"> - Ensure compensation analysis conducted upon return of leave of absence - Specific to maternity – ensure employees on maternity leave receive an increase as any other employees during cycles - Offer a career discussion when employees return from leave

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](#).

In addition to compensation, employee benefits are a pivotal point in the very competitive Tech industry and a key component for talent recruitment. Some of the major topics addressed by the compensation and benefits roadmap are in line with Criteo's DEI, and safety and well-being strategies available in the "Social - Section III.4" section of this Report (e.g., the Carrot Fertility and Family Forming program).

For example, we enhanced our well-being support for Criteo employees by expanding our existing provider's services to six additional countries, resulting in a more comprehensive and flexible offering. Currently, all Criteo locations have some form of well-being program in place, with the exception of two countries, where the program is scheduled to be introduced in 2025.

At every insurance or program renewal, we assess market competitiveness and propose enhancements. For instance, in 2024, Criteo added an additional health plan in Germany and Japan, as well as a long-term disability plan in Japan, increased accident coverage in Spain and life coverage in Cyprus, devised an interim plan in Romania until there were enough employees to implement a group health plan, and increased the meal voucher amount in Brazil.

4. Safety and Well-being at Work

Adapting to New Ways of Working

Following the working policy established in 2020 and subsequent employee feedback, Criteo's **Flexible Work Approach** was launched in 2022. Aligned with our values of being "Open, Together, Impactful", this approach is based on trust and lets employees choose to work from home, work from an office, or do a mix of both, with some exceptions for employees whose on-site presence is deemed essential (e.g., IT, workplace safety).

In 2022, we created a **flexible working steering committee**. The governance structure of the committee was reviewed, and members continue to work on various projects such as improving the Flexible Work Approach, employee engagement, and social events strategy.

Criteo continues to provide financial support for each employee to buy suitable remote working equipment (screens, ergonomic chairs, desks, etc.). We also provide learning resources to all employees to support healthy and effective working habits in a flexible work environment, including recommendations for successful hybrid work, safety tips for working from home, guidelines for effective virtual meetings, and many resources to support everyone's balance through breaks and disconnection.

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.

Promoting Employee Well-being

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, such as the Flexible Work Approach mentioned above in this report. Aside from those, many initiatives have been launched and continued throughout the year.

As a key measure, Criteo continues to provide an **Employee Assistance program** across all countries. This is a free and confidential external helpline that is available 24/7 for support on various issues. Employees in all countries can also access free counseling sessions through an external provider in their local languages. The program also helps with daily life matters, such as finding child and elder care and accessing legal and financial services.

In 2022, Criteo expanded its support initiatives by establishing an internal network of **Mental Health First Aiders**. Comprised of trained employees, this network is equipped to recognize common mental health challenges, address potential concerns, and engage in non-judgmental conversations, complementing the external support already in place. These first aiders can act as a first point of contact for colleagues facing mental health challenges or crises and can guide them to professional support if needed. To date, 100 employees globally have received their certification, and we plan to continue growing this support network in 2025.

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. Through this initiative, Criteo proactively extends the Company's response to a French regulatory requirement to all employees across the globe.

Unlike the engagement survey, the feedback and the conversations are not anonymous and allow for personalized follow-up. This process is not mandatory, although Criteo highly encourages all employees to participate. In 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. To help managers conduct those conversations about well-being, specific training, toolkits and materials were designed for them. These elements are accessible to all employees globally.

Criteo is deeply committed to promoting awareness, equipping employees with the tools to prioritize their mental health and well-being, and fostering management practices that encourage healthy work habits. To this end, multiple manager-level training sessions have been conducted on crucial topics such as psychological safety and navigating difficult workplace conversations. In recognition of **Global Mental Health Day**, comprehensive resources were shared with employees, complemented by a series of dedicated events.

Criteo's online training catalog offers a wide range of accessible courses, covering subjects like mindfulness, resilience, and stress management. Additionally, the dedicated well-being hub on the intranet provides employees with immediate access to valuable resources designed to support their mental health. In 2024, this hub was redesigned to enhance usability and accessibility.

Every Criteo employee, along with up to five friends or family members, enjoys complimentary access to the **Headspace app**—a benefit embraced by over 1,400 actively engaged employees. Headspace offers a wide array of resources, including mindfulness exercises, meditation sessions, workouts, sleep aids, nutritional guidance, and more. In 2024, Criteo employees primarily utilized this service to enhance focus at work and improve sleep quality, with users engaging with the app's content an average of nine times per month.

Additionally, most offices are equipped with standing desks available to employees without the need for a medical prescription, while ergonomic seating can be provided upon request with a prescription. These options are tailored to meet individual needs, ensuring greater comfort and productivity in the workplace.

To further support well-being and focus, Criteo continues to observe "Quiet Fridays" on the first Friday of every month—designated as meeting-free days to encourage time for self-development, reflection, learning, and uninterrupted work.

Safety at Work

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. This initiative aims to establish a global standard and embed HSEPS principles across every aspect of our operations worldwide.

HSEPS Management System

To ensure a unified and consistent approach, our HSEPS Management System has been designed in alignment with internationally recognized ISO standards. It provides a global framework adaptable to the specific regulatory requirements of local operations. The key standards underpinning this framework include:

- ISO 45001: Occupational Health and Safety Management Systems
- ISO 14001: Environmental Management Systems
- ISO 9001: Quality Management Systems

New Policies and Manual

Criteo has introduced three foundational policies: HSE Policy, Cardinal Rules, and Physical Security Policy. These are supported by a comprehensive HSEPS Manual. These documents are currently in the consultation phase before final approval and are expected to be implemented in 2025. Together, they establish a clear roadmap for achieving excellence in health, safety, and security.

Training and Awareness

We have developed a general HSE induction e-learning module tailored for all Criteo employees and contractors. This module provides foundational knowledge on HSE principles and is complemented by site-specific training programs in development. These resources will ensure that all new joiners are fully equipped to integrate safety practices into their roles, with annual refresher courses to reinforce awareness and compliance.

Comprehensive Protection Measures

To safeguard our people and assets, we are implementing advanced physical security solutions that are integral to creating a secure environment for all employees and visitors. These include:

- Access control systems
- Video surveillance (at applicable sites)
- Partnerships with local site security

International SOS Tool

Recognizing the importance of employee safety during business travel, Criteo relies on the International SOS Assistance Tool. This tool enhances existing emergency support provided by our healthcare insurer by offering:

- A 24/7 hotline for immediate assistance on security-related issues
- Real-time tracking of employee travel for rapid identification and outreach in emergencies

This comprehensive solution reflects our commitment to ensuring the safety and well-being of our workforce, wherever they may be.

Looking Ahead

Criteo's commitment to advancing HSEPS is unwavering. By leveraging data-driven insights, fostering strong partnerships, and cultivating a culture of continuous improvement, we are shaping a safer, more sustainable future. Together, we strive to protect our people, empower our operations, and contribute positively to the communities and environments in which we operate.

5. Skills Management and Development

In the following section, the various types of learning and development solutions we provide are referred to as:

- **Instructor-led trainings:** live trainings and virtual classrooms where:
 - Live training refers to training delivered face-to-face by an internal or external trainer.
 - Virtual classrooms refer to virtual training delivered by an internal or external trainer via teleconferencing.
- **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

To be noted that the decrease in training hours in 2024 was expected, as the L&D team focused more on coaching and mentoring to support employee growth. Criteo now uses a blended learning approach that combines in-person, virtual workshops, online courses, micro-learning, team-level workshops, formal certifications, and coaching. This approach prioritizes quality and practical development over the number of training hours

a. Instructor-led Training 2024 Highlights

Top Talent Program "Leadership Journey"

The Leadership Journey is an eight-month global development program designed to foster the growth of Criteo's top talents. The program's objectives are to build leadership capabilities, accelerate business effectiveness and success, create development and growth opportunities, expand the Criteo community and network, and foster our culture, values, and leadership behaviors. In 2024, 28 participants followed a full training program, including leadership workshops, learning expeditions, e-learnings, and individual and group coaching.

Manager Development

Criteo continues to expand the development program which aims to support Criteo managers in building their Leadership Behaviors. The program includes three different tracks:

- **Success makers:** a six-month, in-house training program designed for new or recently promoted managers (i.e., with less than two years of managerial experience), launched in 2024. The program combines live facilitation, digital training, mentoring and coaching.
- **Future makers:** a six-month skills development journey tailored for senior managers, with the aim of developing Criteo's Leadership Behaviors and creating new leadership habits. In 2024, 122 managers went through the program. Participants have reported positive feedback on the relevance, usefulness, and impact of the program to their role as managers.
- **Managers' circle:** groups allowing connection, social learning, and sharing of best practices between managers. All managers are invited to join this group whether they are hired as a manager or promoted into a management role.

Perform and Develop Webinars

Criteo's approach to Perform and Develop helps employees and managers drive performance. The learning and development ("L&D") team supported the Perform and Develop Cycle with "Just-in-time webinars" to promote timely information on our Perform and Develop process for all Criteo employees and managers.

Criteo Interviews

At Criteo, our goal is to attract and retain world-class talent, and we're committed to finding the right people for the right roles. In collaboration with our global TA team, we designed a new training program that gives hiring managers the knowledge and skills to hire the best talents. The virtual workshop trains interviewers on how to conduct performance-based interviews, evaluate candidates, and make effective, fair, and inclusive hiring decisions.

Global Onboarding Live Sessions

Criteo revamped its Global Onboarding program designed to enable a smooth and engaging transition for new Criteo employees. During their first week at Criteo, newcomers participate in the Criteo Landing onboarding journey, which consists of two main components: live sessions and courses that are available on our learning platform, Learning Quest. Topics include general Criteo information on its business and strategy, opening hours of IT services, and life at Criteo.

In-class Solution Based on Learning Catalog

Criteo provides employees with an extensive catalog of in-class trainings. This catalog is aligned with employees' individual development plans, and employees can freely enroll in the in-class training courses available in the catalog. In 2024, the catalog has been expanded with new e-learning, webinars, workshops, and coaching programs. The catalog will be updated quarterly.

We have worked with three external vendors to deliver skill-building webinars and workshops for all Criteo employees. In 2024, 33 webinars and workshops were delivered on topics of: managing hybrid teams, change agility, productivity and prioritization, conflict handling, effective communications.

Developing Team Strengths

In 2023, Criteo started using the "CliftonStrengths" tests developed by Gallup to help employees self-assess their strengths. Self-assessments are debriefed by a coach through a 1-hour coaching session, and the L&D team facilitates team sessions based on the team's collective strengths. These sessions aim to foster collaboration and help teams achieve their objectives by helping them use their strengths on a day-to-day basis. Up to this date, Criteo has facilitated in-person and virtual sessions for 48 teams and 453 employees. During 2024 Criteo had 13 internal coaches and facilitators who deliver this offering. In 2024, due to its success and positive feedback from employees, the program has been scaled up with more internal facilitators and coaches: we welcomed five new coaches and facilitators who are certified by Gallup.

Beyond formal training programs, more is happening on the ground that include cross-functional teams and organizations, peer-to-peer knowledge sharing, and social learning initiatives. These more informal and *ad-hoc* activities are locally driven and facilitated, and form a significant part of the overall learning experience that are integral to fostering Criteo's dynamic learning culture.

The satisfaction rate of instructor-led trainings is 4.5 out of 5.

In-class Training KPIs

IN-CLASS TRAINING	Training hours	Average training hours per employee	Average training hours per trained employee	% of trained employees
2023	7,243	1.7	4.9	37%
2024	3,311	1	2.9	29%
% evolution	-54%	-52%	-41%	-8%

b. Online Training 2024 Highlights

Criteo provides all employees with four online training platforms²⁹ which provide access to over 100,000 training courses and allow free registration to workshops.

In 2024, Criteo advanced its internal learning ecosystem by further implementing our Learning Management System (LMS)—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. A key advantage of

²⁹ Coursera, Speexx, LinkedIn Learning and Learning Quest.

Learning Quest is its integration of most training workshops and events, creating a unified entry point for users. This consolidation improves reporting on training completion and streamlines the management of individual learning paths.

The **Management Performance Cycle** is anchored by two key milestones: the June and October check-ins. As part of this initiative, tailored e-learning modules are developed to address essential internal processes. These include practical training on topics such as "How to Give Feedback" and "How to Evaluate Employee Performance."

Within the **Criteo Interview program**, the "Criteo Hires" e-learning module was introduced to equip managers, interviewers, and recruiters with critical insights into the hiring process. This includes training on our DEI practices as well as recruitment compliance procedures.

To enhance our Global Onboarding Live Sessions, we launched the "**Welcome to Criteo**" e-learning. This initiative provides newcomers with the essential tools and knowledge to thrive in their roles and integrate seamlessly into the organization. The program includes interactive modules, videos, quizzes, and opportunities to consolidate learning through live virtual sessions. By introducing employees to our Company culture, values, policies, and procedures, it lays the foundation for a rewarding and successful career journey at Criteo.

We continued to deploy the **People Processes program**, which is a digital learning path for managers that includes four to five modules covering topics such as recruitment, daily management, performance, and onboarding. In 2024, we simplified performance review processes with new June and October check-ins, updated the digital learning, and ran live workshops and webinars.

Additionally, our platform has expanded its language offerings beyond English to cater to a more diverse audience. It is refreshed annually with new content to align with the organization's evolving business priorities.

Online Training KPIs

ONLINE TRAINING	Training hours	Average training hours per employee	Average training hours per trained employee	% of trained employees
2023	22,487	5.2	7.8	72%
2024	18,909	5	6.1	78%
% evolution	-16%	-12%	-22%	+6%

In addition to the core trainings mentioned above, employees completed extra online trainings representing roughly 8,423 hours, covering subjects 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%).

c. Criteo's Coaching Offer

Coaching is a powerful tool to empower our employees to tap into their full potential and bring their whole selves to work. It is also a great tool to enable global business growth.

We developed various coaching options to meet the needs of every level:

- For Individual Contributors and Team Leads:

In 2024, Criteo expanded its internal coaching program **CoachMe** to reach a wider employee base, enabling personalized coaching sessions on career development, work-life balance, and professional efficiency. The program successfully achieved its goal of training 24 internal coaches and facilitated coaching for 171 employees in 2024. Additionally, it allows coaches to conduct self-assessments in three key areas: Career Growth, Professional Efficiency, and Work-Life Balance.

- For Managers:

As part of the program **Future Makers**, coaching is provided through BetterUp, a leading platform in the coaching market. Participants benefit from on-demand coaching with flexible session frequencies tailored to their needs. These sessions typically last 45 minutes to 1 hour and occur once to twice per month.

- Coaching for Executive & Senior Leaders:

Executive and Senior Leaders are supported in enhancing their leadership and development capabilities through high-quality executive coaching. In November 2023, a coaching program designed by BetterUp was launched for senior directors and leadership team. Additionally, Criteo introduced strengths-based coaching for all using the CliftonStrengths tool.

Coaching offer KPIs

Coaching Offer	Coaching hours	Average number of coaching hours per coached employee	% of coached employees
2023	1,085	3	8%
2024	2,249	3.1	18%
% evolution	+107%	+3%	+9%

d. Criteo's Mentoring Offer

In 2024, we introduced a new standalone offering, the **Criteo Global Mentoring program**, powered by the MentorcliQ platform. This 6-month internal, open mentoring initiative focuses on developing soft skills, fostering meaningful connections between mentors and mentees through relationships built on mutual respect and trust.

The program provides a unique opportunity for both mentors and mentees to share experiences, exchange knowledge, and learn from one another. At Criteo, we believe mentoring is a powerful tool for professional growth—helping participants reflect on their careers, expand their networks, explore new ideas, celebrate achievements, and find valuable support along the way.

e. 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.

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.

IV. Employee Relations, Inclusion, and Diversity at Work

1. Employee Relations

a. Internal Communication

Twice a quarter, Criteo hosts **Global All Hands** which are webinar-style meetings that give the leadership team a platform to share the strategy and other important information with employees all over the world. In 2024, the format was enhanced to further employee engagement. All employees now get a chance to give feedback, suggest improvements and topics for future sessions through a survey that is sent after each Global All Hands.

As a publicly listed company, we also run specific **Earnings** sessions as part of Global All Hands each quarter to cover Criteo's financial results with employees. These meetings provide key business updates and allow employees to ask questions. Additionally, each team has regular functional "All Hands" to cascade further information on key business priorities and performance metrics.

In 2024, the internal communications team launched the **Newsroom** to keep employees informed about leadership and Company communications. Newsroom is a central place on our intranet. It gives direct access to any company-wide information which can be sent through various channels (e.g. email, Slack), replacing the need to search for information.

b. 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 trainings to give and receive feedback in a constructive way. The **performance review process** includes additional feedback conversations between managers and employees, and it has transitioned into shorter, more frequent check-ins to make the process easier and more consistent throughout the year.

We 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. We learned that we have opportunities to strengthen internal career opportunities to improve employee retention.

Criteo also regularly runs **company-wide employee surveys** to measure engagement over time. **Criteo VOICES** is our recurring employee listening program that allows us to measure employees' engagement and understand where we need to focus our attention to drive our business and our culture forward.

In both surveys, we measure employee engagement by asking five questions:

- Would I recommend Criteo as a great place to work?
- Does Criteo inspire me to do my very best?
- Am I proud to work for Criteo?
- Do I rarely think about looking for a job at another company?
- Do I see myself still working at Criteo in two years' time?

In response to these surveys, we held five sessions with all Criteo managers to focus on strengthening team engagement. To maintain a close connection with employees, we measure engagement multiple times a year through a full engagement survey and two shorter pulse checks. While the pulse checks track engagement scores over time, the full survey provides deeper insights, including scores and feedback on a broader range of topics, along with approximately 2,200 qualitative comments from employees.

The main strengths identified through our engagement surveys in 2024 were the following:

- Managers of teams – Respondents feel Criteo demonstrates genuine care for well-being, listens to feedback, and keeps employees informed.
- Goals alignment – Respondents say that they are clear on how their work contributes to achieving Criteo's goals.

Managers receive immediate access to their team's feedback from these surveys and are encouraged to hold open discussions about strengths and areas for improvement. To support them, we offer resources and training to enhance team engagement. Additionally, we collaborate with leadership, People Business Partners ("PBPs"), Criteo's culture team, and other stakeholders to analyze global feedback and implement actions to address identified concerns. At the company level, survey results and key focus areas are shared with employees through written communications and at Global All Hands meetings, ensuring transparency and alignment across the organization.

In 2024, we enhanced the **Manager Effectiveness Survey** to now assess:

- Effective manager behaviors that are defined in Criteo's new Effective People Management Framework (e.g., goals setting, regular 1:1s, and well-being.)
- Criteo's Leadership Behaviors, a set of behaviors that drive our shared success at Criteo (see Our Culture and Values in "Introduction - Section I.3" section of this Report)

This survey is an opportunity for Criteo employees to provide their direct managers with insights on the areas in which they feel well-supported, as well as opportunities for improvement. Managers get access to a detailed report of the feedback provided by their team. They are encouraged to review the feedback with their own managers and use it as input to define their own goals for growth and development.

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. The overall onboarding journey includes three levels:

- **Global level (Criteo Landing):** providing all employees globally with consistent experience and resources
- **Local level (Criteo Explorers):** allowing employees to learn more about their office locations, understand their local employee benefits, and ask questions specific to the country/location they work in
- **Role level (Criteo Role Trek):** giving employees access to a role and function-specific onboarding within their teams or divisions

The Criteo Adventure Global Onboarding program is designed to provide long-term support as the overall process lasts a total of six months from the pre-onboarding actions to the completion of the mid-year touchpoint. Dedicated surveys are also a key element to ensure the quality of the onboarding experience. In 2024, as part of the onboarding process, a new platform was launched to automate the matching process for the **Buddy program** where each new joiner is paired with an experienced employee to support them with the social aspects of the Company.

In 2024, we launched a brand-new add-on, designed specifically for new Criteo managers, both for newly hired and newly promoted ones. Every new manager receives a welcome email packed full of resources, including: the new Managers' Playbook, a link to the mandatory People Processes for Managers on Learning Quest, and information about one of our relevant manager courses - **Success Makers program** or **Criteo's Future Makers program**.

In 2024, we also worked on strengthening our Company culture by reinforcing the role and the work of Criteo's culture team, a cross-functional team composed of members from various teams and regions. Working with this group of Criteo employees allows us to gather direct input from employees across regions and share it with the CEO and the Chief of Staff. The culture team has mostly been focused on offering suggestions to strengthen Company culture, improve communication between leadership and employees, and foster employee well-being.

c. Employee Recognition

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.

The program includes social recognitions to applaud everyday contributions, point-based recognitions to reward achievements performed during a month, and quarterly standing ovations to reward outstanding achievements. The platform also allows employees to recognize great actions performed through the Criteo Cares program or even to celebrate employees' milestones within Criteo (hiring, promotions, return from long-term leave, Criteo anniversaries, *etc.*).

2. Diversity, Inclusion, and Equal Opportunities

a. Criteo's Strategy for DEI

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 groups³⁰ and the leadership team.

Spread across different regions, our DEI team works closely together to ensure that DEI remains a priority across all of our locations.

Established in 2021, our DEI strategy is communicated in Criteo's **Global DEI Vision and Commitments**³¹, Criteo's **DEI Policy**, and Criteo's **Inclusion Index** (see hereafter) – 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

The main crosscutting elements of Criteo's DEI strategy are focused on developing inclusive hiring programs and practices (Open Path program, Criteo Hires, Voluntary Disclosure Form & Dashboard), retaining our diverse talent via sponsorship programs (Women in Tech roadmap, Elevate program), and strengthening our inclusive culture via the

³⁰ Employee Resource Groups.

³¹ More details on Criteo's website [here](#).

Preventing Harassment training, the Disability Inclusion roadmap, our Criteo Cares communities roadmap, and the Inclusion Index.

The following sections offer a more detailed vision of Criteo's policies, commitments, and actions toward gender equality, the LGBTQIA+³² community, all types of families, social diversity, people with disabilities, and BIPOC³³ Communities, as well as a focus on general non-discrimination procedures and measures.

DEI Objectives 2024

Diversity – Representation of varied identities and differences, collectively and as individuals

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

Inclusion – The sense of belonging and value that is felt throughout Criteo

1. Focusing on Hiring Programs

- Increasing women in Tech roles³⁴ 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.

2. 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

3. Strengthening our Inclusive Culture

- Maintaining our very high Inclusion Index
- Preventing harassment training
- Engaging employees in the Criteo Cares program

Global Inclusion Index

In 2021, Criteo established its first Inclusion Index, to evaluate our culture of belonging, authenticity, psychological safety, and inclusive leadership. Our inclusion score was reassessed in July 2024, revealing a score of 80 /100. All

³² Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and Asexual.

³³ Black, Indigenous, and People of Color.

³⁴ 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.

employees who had been with Criteo for over three months at the time of the survey were eligible to participate. With a participation rate of 79%, this included 2,656 Criteo employees.

DEI Survey

In 2022, we conducted an in-depth DEI study in collaboration with a specialized provider. The study was voluntary and anonymous, including specific self-identification questions to help us better assess our workforce composition and the inclusivity of our culture. The 2022 survey supported the cultural findings from our Inclusion Index and gave us deeper insights into topics of fair management, career development, workplace flexibility, workplace safety, and recruiting and hiring.

While the survey was not repeated in 2024, we included these DEI questions in Criteo VOICES survey, which is a broader employee survey. Our focus for the year was dedicated to sustaining and enhancing the outcomes achieved in the 2022 survey.

Actions from survey insights:

Career Development	Fair Management	Workplace Safety
Clarity around internal career paths Promotion of internal career vacancies and voyager (short term assignments) Mentoring program CoachMe program	Communication and Clarity of Promotion Guidelines Launch of Future Makers program (Manager Training)	Mandatory e-learnings (Preventing Harassment and Code of Business Conduct & Ethics) Reinforcing internal guidelines to raise a concern or a complaint Mental Health First Aid Accreditation

In 2023, a **Voluntary Disclosure Form** was also integrated into our application process, allowing applicants to share sociodemographic information (age, gender, *etc.*). This form is optional and complies with the laws of each country where we operate. For instance, information of race and ethnicity is included only for applicants in the U.K. and U.S., where legislation permits. This initiative provides insights into the inclusivity of our current recruitment process. In 2024, we launched the **Voluntary Disclosure Dashboard**, enabling the TA and DEI teams to view candidates' responses to the voluntary disclosure form. This tool helps monitor the number of diverse candidates applying to Criteo and track their progress through each stage of the recruitment process.

DEI Learning Paths

Launched in 2021, **DEI Learning Paths** are online training courses, available to all employees, aimed at strengthening employees' commitment by providing them with a wealth of knowledge on DEI topics. In 2022, training materials related to Criteo's **new Anti-Harassment and Discrimination Policy** were also offered as part of our DEI Learning Paths. All employees globally are required to complete a mandatory annual training with diverse topics (among which anti-harassment and discrimination are included – see the end of the section).

In 2024, we delivered two specialized disability inclusion training sessions to the people team. The first, for the TA team, focused on understanding disability in the workplace, managing disabilities, and inclusive recruitment processes, including defining needs, analyzing resumes, interviews, and onboarding. The second, for PBPs and the people ops³⁵ team, covered similar foundational topics while also addressing recruitment, integration, and managing complex situations, such as reasonable adjustments and providing unbiased feedback. These sessions equipped teams with the tools to foster inclusion and better support candidates and employees with disabilities.

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 (see "Gender Equality at Criteo" section of this Report).
- **EmpowerU Sponsorship program:** U.S.-specific, six-month initiative aimed at empowering employees, particularly addressing the underrepresentation of BIPOC individuals (see "Inclusion for the BIPOC Community" section of this Report).
- The **Pilot Mentoring program** focuses on career and skills development primarily aimed at women in R&D (see "Gender Equality at Criteo" section of this Report).

In 2024, we introduced a new feature called "**Name Pronunciation!**" in our HR tool. This function allows employees to record the correct pronunciation of their name, or to use phonetic, which will help significantly reduce mispronunciations. This feature will enhance our culture by promoting inclusivity and helping everyone feel valued.

Awards received by Criteo for its commitment to DEI are listed in "Introduction - Section I.5" section of this Report.

b. 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. This program is referenced in several sections of this Report.

Criteo Cares projects are driven by seven community groups³⁶ and one committee:

- Women@Criteo Community
- Pride Community
- BIPOC Community
- Criteo Community

³⁵ People operations, a strategic business function that puts employees first.

³⁶ Also known as ERGs "Employee Resource Groups".

- Parents Community
- Green Community
- Education Community
- Giving Committee

These community groups are led by active employee volunteers from various teams and regions. Comprising hundreds of employees from around the world, each community group has its own executive-level leadership sponsor, a dedicated internal website, and an annual roadmap.

More information about the actions taken by each Criteo Cares community can be found in related sections throughout this Report.

Through our **volunteering and giving platform**, launched in 2021 and called "Giving by Alaya/Benevity"³⁷, 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. To further encourage employee engagement, Criteo introduced daily challenges for employees on the platform. Criteo hopes that the volunteering and giving platform will become an increasingly important part of employee engagement.

Criteo Cares program KPIs	2022	2023	2024
Number of Criteo employees who used their VPTO days (at least 0,5 day) ³⁸	368 employees (Approximately 11%)	391 employees (Approximately 11%)	424 employees (Approximately 12%)
Number of Criteo employees in the Criteo Cares program	1,332 employees (Approximately 40%)	1,473 employees (Approximately 41%)	1,876 employees (Approximately 53%)
Number of donations made by the employees through the "Give Back" program on Spotlight (more details on section "Employee Recognition")	\$41,240 USD donated (532 donations)	\$10,735 USD donated (180 donations)	\$4,185 USD donated (59 donations)
Number of Criteo employees with an account on GIVING platform	1,845 employees (Approximately 55%)	2,099 employees (Approximately 58%)	2,574 employees (Approximately 73%)
Number of Criteo employees who took at least one action on the GIVING platform (do good + challenge) during the year	655 employees (Approximately 35%)	546 employees (Approximately 26%)	483 employees (Approximately 14%)

Building on the success of VPTO days, and aiming to further structure our approach, we drew inspiration from a best practice already in place at Iponweb by establishing a **Giving Committee**. This committee is tasked with developing actions linked to donations and volunteering throughout the year, in synergy with the Criteo Cares communities, as well as the DEI and sustainability teams.

³⁷ The Alaya platform (our vendor) was acquired by Benevity in 2022.

³⁸ Criteo provides all employees with a maximum of two working days per year to participate in volunteering activities with local charities.

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 marked several firsts such as the introduction of region-specific Giving Committee leaders and a dedicated APAC Impact Weeks.

In line with our volunteering program, we believe in giving back to society. Through our global talent, we have a variety of expertise and skill sets that are recognized as among the best in our industry. Therefore, our education initiative is rooted in several partnerships with non-profits supporting various communities via mentorship. Our employees have the opportunity to become mentors to young people, refugees, people experiencing professional reintegration, and more.

c. Gender Equality at Criteo

Criteo's Gender Equality Commitments

Criteo has made clear commitments towards advancing gender parity and is proud to drive meaningful change for women in Tech. This includes our commitment to sustain pay equity globally and improving career paths for women in Tech roles (see Criteo's priority KPIs and targets summary table in "Introduction - Section I.4.e" section of this Report).

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%.

As a signatory member of the **Tech for Good³⁹ Call**, Criteo also made strong commitments to improving women's representation in leadership positions (more information available [here](#)).

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 targets⁴⁰ 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.

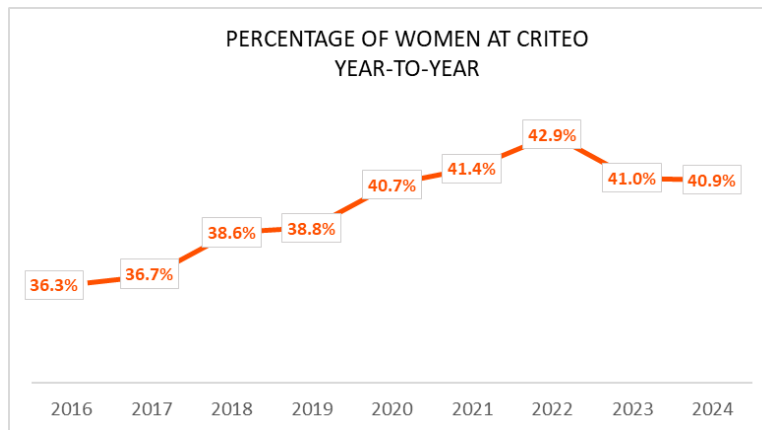
Monitoring gender equality at all levels of the Company

³⁹ "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.

⁴⁰ The targets mentioned in this paragraph concern Criteo's French entities.

Gender equality	Total employees		Managers		Directors and VP (Vice President)	
	2023 (N-1)	2024 (N)	2023 (N-1)	2024 (N)	2023 (N-1)	2024 (N)
Male	2,118 (59%)	2,084 (59%)	480 (67%)	451 (64%)	234 (70%)	226 (67%)
Female	1,480 (41%)	1,449 (41%)	239 (33%)	249 (36%)	102 (30%)	113 (33%)
Not Declared	12 (<1%)	8 (<1%)	2 (<1%)	0 (0%)	0 (0%)	0 (0%)
Total	3,610	3,541	721	700	336	339

Our long-term efforts to attract and retain women talents over the past seven years are demonstrating overall progress, as shown in the graph below:



Criteo is committed to hiring talent without gender discrimination and ensuring fair opportunities for all, regardless of gender. In 2024, 40.9% of promoted employees were women, aligning with the overall representation of women in the Company, which stands at 41%.

Key Programs and Partnerships Supporting Women in Tech Roles

- Launched in 2022, Criteo's **Pilot Mentoring program** focuses on career and skills development for targeted groups, with women in R&D as a primary area of focus. In 2023, we set up the **Global Mentoring program**, a 6-month internal program focusing on developing soft skills. This program fosters inspirational relationships based on mutual respect and trust, with both mentors and mentees being Criteo employees.
- **Ada Tech School** is an inclusive and feminist computing school, accessible for all to learn how to create with coding in an open, caring environment. In 2024, a Criteo R&D professional and member of the internal Women in Tech Network volunteered their time to conduct interview simulations for students at the Ada Tech School. This initiative aims to equip students with the skills and confidence needed to tackle real-world challenges and empower the next generation of Tech talent.

Events Promoting Gender Equality

- **Top Women Tech – Careers International:** In June 2023, Criteo participated for the second time in the Top Women Tech Summit by Careers International in Brussels. During this event, eighteen companies met with 120 high-profile tech talents open to career opportunities.
- **WomenTech Global Conference:** In December 2024, Criteo's Senior Vice President of Talent Development and DEI, delivered an inspiring talk at the Women in Tech Global Awards hosted by Women in Tech Network.

Employee Engagement for Gender Equality

Women@Criteo Community

With around 770 members, Women@Criteo Community is an inclusive internal network that aims to transform and promote gender equality within the Company. Its mission is to be a catalyst for the advancement of women in the workplace at Criteo and in our industry to promote equal access to all opportunities across our organization.

Key Women Community Events in 2024:

- **Leading from the Top:** fireside chat with Megan Clarken (Criteo CEO⁴¹) and Founder of Women in Tech Global on DEI challenges, women's impact on AI, and empowering female leadership
- **Allyship – Verb, Not a Noun:** panel featuring male and female leaders focused on supporting and elevating women in their career journeys
- **New York – Panel Discussion:** learning into kindness, exploring personal resilience and fostering a supportive, inclusive culture through shared stories
- **Barcelona Workshop:** connect with your inner voice, providing insights on workplace boundaries and navigating challenges
- **Paris Workshop:** leaning into kindness, focused on mental and physical health strategies through interactive discussions
- **Inspire Inclusion – Global Crossover Event:** an external expert sharing her inspiring journey overcoming Apartheid-era challenges to succeed in tech
- **Spring Charity Fair** in the Barcelona Office in partnership with the Green Community, featuring a clothes swap, book swap, and bake sale

Women in Tech Sponsorship Program

The **Women-in-Tech Sponsorship program** 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

⁴¹ Megan Clarken retired as CEO in February 2025. The initiatives and commitments mentioned in this report reflect the leadership transition during the reporting period.

3. Improve our inclusive culture in Tech

To fulfill the first objective, we introduced a series of targeted initiatives. A dedicated LinkedIn campaign was launched to attract women in Tech in India, showcasing our inclusive workplace culture and opportunities for career growth. To broaden our talent pool, we partnered with the Women in Tech Network, a global community that promotes gender diversity in technology and connects skilled professionals with companies that prioritize DEI.

Our outreach efforts include active participation in external events hosted by women-focused communities and ERGs. We also collaborate with non-governmental organizations such as Rêv'Elles, ScienceFactor, Sistech, and Ada Tech School to inspire and engage younger generations, particularly encouraging girls and young women to pursue careers in Tech.

To achieve the second objective, the DEI team facilitated regional focus groups in EMEA and the Americas, beginning with women in R&D roles and subsequently expanding to include women in product functions, as well as women in Tech sales in APAC. These focus groups provided a platform to gather valuable feedback from women in Tech roles, aiming to enhance their overall experience at Criteo. Participants recognized Criteo for its strong commitment to DEI, flexible policies, and diverse recruitment practices. However, they also suggested improving career development support for women.

In response to these insights, the DEI team established the Women in Tech Network in 2022 to bolster career growth for women in Tech roles at Criteo. In 2024, we organized quarterly activities dedicated to advancing career development, including:

Q1 2024: Career Development Activity

- Engineering Career Paths & internal career advancement opportunities
- Managerial insights, and tackling imposter syndrome
- In-person networking event in Paris

Q2 2024: Career Development Activity

- "Knowing your unique strengths through the lens of the MBTI" Workshop
- WomenTech memberships
- Public Speaking Workshops

Q4 2024: Career Development Activity

- The Networking Starter Kit: how to strategize, build, and maintain an effective network workshop by external speaker.

To achieve the third objective of the Women in Tech Sponsorship program—fostering a culture of collaboration and inclusivity within Tech teams—we organized several impactful initiatives in 2024. These efforts underscored our commitment to promoting a sense of belonging and mutual support. The **Active Allyship for Leaders** workshop,

tailored for the product leadership team, provided leaders with practical tools to advocate for inclusivity. The Leaders workshop for managers of Tech teams emphasized cultivating inclusive leadership and strengthening allyship within technical teams. Furthermore, the Together for Change: Allies in Action webinar inspired participants to actively practice allyship and drive meaningful transformation. Collectively, these initiatives reinforced our dedication to building a supportive and inclusive environment for everyone in Tech.

d. Inclusion of the LGBTQIA+ Community

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 (see hereinafter).

MyGwork is a business community for LGBTQIA+ professionals, students, and inclusive employers. Criteo's partnership with MyGwork creates more opportunities to network, mentor, and build relationships inside and outside of Criteo in support of the LGBTQIA+ community. In 2024, Criteo participated in numerous events, including MyGwork WorkFair (the largest global virtual career fair for the LGBTQIA+ community) and WorkPride, a global five-days virtual Pride conference.

In 2022, Criteo signed the **LGBTQIA+ charter of L'Autre Cercle**, a leading non-profit for the inclusion of LGBTQIA+ people in the professional world, thus committing to create an inclusive environment for LGBTQIA+ employees, promoting equal rights and treatment for all regardless of their sexual orientation or gender identity.

For awards and recognitions related to LGBTQIA+ inclusion, see "Introduction - Section I.5" section of this Report.

The **That's My Name program** allows employees to choose the name they want to be known by in the Company's systems and tools. We recognize that using a preferred name is essential for feeling welcomed and included. In 2023, we enhanced this program to support employees who prefer to use only their first name or do not have a last name, which is common in certain regions.

Launched in 2022, the LGBTQIA+ Inclusion Training focuses on inclusive language and the diverse aspects of LGBTQIA+ identities, including sexual orientation and gender identity. It highlights the experiences of trans and non-conforming individuals, such as non-binary people, and emphasizes creating trans-inclusive workplaces. The training also addresses lesser-known identities within the '+' category, which are often misunderstood or overlooked. Its goal is to foster greater inclusion for LGBTQIA+ employees and strengthen allyship within Criteo.

Pride Community

With around 280 members, Criteo's Pride Community promotes initiatives to develop an open and inclusive work environment where Criteo employees can be themselves and feel supported. In 2024, the Pride Community provided awareness on LGBTQIA+ Inclusion topics throughout the year. The main milestones were the following:

- **Fireside Chat:** An external expert shared insights about his role at the International Labour Organization, and engaged in an inspiring conversation with Criteo employees
- **LGBTQIA+ and allyship Talk:** An external expert discussed LGBTQ+ allyship in an increasingly hostile world
- **MyGwork WorkPride 2024:** A series of online sessions including panel discussions featuring Pride Global Leaders
- **Leading with Pride:** A fireside chat with CEO Megan Clarken and Capgemini, focused on overcoming challenges and the role of Pride and allyship in leadership
- **New York Scavenger Hunt:** An exploration of historic landmarks like the Keith Haring bathroom, Julius' bar, Stonewall Inn, AIDS memorial, and James Baldwin Residence
- **Barcelona Fireside Chat: Being Your Authentic Self:** A group of panelists shared deeply personal stories
- **Barcelona Pride Parade:** Criteo's own float debut in an unforgettable parade celebration
- **Criteo Cares & EcoVadis:** A virtual event with fertility and family-building experts from Carrot, supporting LGBTQIA+ employees and their families
- **Pride x Parents Crossover:** A discussion about the challenges and joys of LGBTQIA+ parenthood
- **Barcelona Ride & Women@Criteo Charity Fair:** A local fundraising event for Teresa Gallifa and Ahora Dónde charities, featuring cake and mulled wine
- **Trans Day of Remembrance Panel:** A virtual event in collaboration with MyGwork where trans individuals shared personal and professional journeys, emphasizing on inclusion and combating transphobia

e. Parenthood Support at Criteo

Since the launch of Criteo's extended **secondary care parental leave**⁴² in 2021, much has been done to support parents amongst our employees, as demonstrated by the **Family Friendly Company Label** Criteo received.

Additional efforts include Criteo's career website which now has a "Supporting Families" [page](#) explaining Criteo's vision and actions for a family-friendly company.

A key example of parenthood support at Criteo is the **Carrot" program** launched globally in 2022. This program is an employer-sponsored inclusive fund for fertility treatments and family-forming services. It covers fertility education and assessments, fertility preservation, in vitro fertilization (IVF), donor-assisted reproduction, including gestational carrier services (where legally allowed), and adoption (more information available [here](#)). Today, most employees are eligible regardless of gender, sexual orientation, single or couple status, *etc.* In addition, Criteo covers up to a lifetime

⁴² Offered for four weeks across all locations globally, regardless of their gender or marital situations.

equivalent of \$50K USD based on each country's cost of care as determined by Carrot for treatments and services per employee.

Criteo also partners with **Fertility Matters at Work**, an organization that raises awareness of how fertility issues impact employees and their organizations (more information available [here](#)). The organization also supports Criteo by offering guidance on how the Company can enhance its efforts to become a fertility-friendly employer of choice.

Re-Onboarding Toolkit: A new resource for employees transitioning into or returning from leave, focused on childcare.

Parents Community

With over 380 members, the Parents Community aims to support parents throughout their parenting journey, from the moment they discover their future parenthood to their return to work and beyond. Some key actions taken by the Parents Community in 2024 include:

- **Parental Awareness Celebration:** honoring and celebrating parents' dedication at work and home
- **Pride x Parents Crossover:** A panel discussion on LGBTQIA+ parenthood challenges and joys
- **Paris Kids' Day:** welcomed 135+ kids for a day of fun activities
- **Cyprus Volunteer Event:** combined volunteering and parenting with activities for kids, ensuring no child is without toys, clothes, or food this Christmas
- **Bring Your Kid to the Office Boston:** a day for children to join their parents at work
- **"Finding Equity at Home" Event:** collaboration with Women@Criteo Community on balancing responsibilities at home
- **Sustainability Panel:** A discussion on how to talk to kids about environmental issues, featuring community leaders sharing strategies and insights
- **Bring Your Kid to Work Day NYC:** A parents/children day at the office with engaging activities
- **Munich Kid' Office Takeover:** A kids take-over day at the Munich office
- **Paris Breakfast Gathering:** A fun breakfast meet-up with mindfulness parenting materials
- **Nutrition for Children Workshop with Sophie Trotman:** A nutrition workshop that covered topics such as micronutrients, picky eating tips, positive mealtime language, and packed lunch ideas
- **Parenting & Stress Management with Lisa Mackey:** insights and tools to manage parenting stress effectively
- **APAC Virtual Workshop with Sandra Mederer:** A discussion on mindfulness and its benefits in day-to-day parenting

f. Social Diversity

In 2024, we launched the newly developed **campus program at Criteo**, a global initiative designed to standardize and elevate the internship experience across the organization. This program aims to deliver a personalized and engaging experience for interns, aligning with our employer branding strategy to attract top student talent worldwide. By fostering collaboration, growth, and meaningful connections, the campus program not only enhances the intern journey but also accelerates hiring and strengthens our talent pipeline. On the DEI front, the program emphasizes diversity and inclusion through the use of inclusive recruitment materials, partnerships with diversity-focused student organizations, and dedicated mentorship opportunities for underrepresented students. This approach underscores our unwavering commitment to equity and inclusion.

Other initiatives and partnerships pursued in 2024 include:

- **Rêv'Elles**: French non-profit organization that inspires, motivates, and supports young women from underrepresented neighborhoods in their personal and professional development (more information available [here](#))
- **Global Contact/ Science Factor (France)**: An initiative by Global Contact aimed at inspiring interest in science and technology. Starting in 2023, the program introduces a new challenge to engage over 100,000 teenagers annually, with a special focus on encouraging young girls to participate
- **Oreegami (France)**: A digital marketing academy that supports graduates and job seekers in accessing promising careers in digital fields. It partners with French agencies and AdTech companies to train future advertising campaign managers
- **Seekube**: A recruitment platform hosting over 500 job-dating events annually, providing opportunities for talents with disabilities
- **MyGwork**: A professional business community for LGBTQIA+ individuals, students, and inclusive employers
- **Article 1**: A non-profit organization striving for a society where academic and professional success is not influenced by social, economic, or cultural backgrounds. It promotes success through social connections and civic engagement
- **Sistech**: A European non-profit organization established in 2017, dedicated to empowering displaced women by helping them secure skilled and sustainable employment in the tech and digital sectors
- **Simplon.Co renamed FACE in 2024**: Dedicated to supporting individuals from diverse backgrounds in accessing digital careers, aligning with our company's DEI vision and values
- **EvenBreak**: A specialized online job board focused on helping companies discover top talent

Education Community

With around 240 members, the Education Community's goal is to support, guide, and encourage under-represented people in the employment market. Some key achievements of the Education-Community in 2024 are presented below:

- **Environmental Month – Addressing Sustainability With Your Kids:** Crossover event with Green and Parents Communities, discussing how parents engage with children on green initiatives
- **Inspire Inclusion – Global Crossover Event:** Netskope's Head of Cloud Strategy & Innovation shared her journey of resilience and success in collaboration with Women@Criteo Community
- **Rêv'Elles Visits Criteo Paris:** eight young women from Rêv'Elles visited the Paris office to learn about Criteo
- **Education x Women@Criteo Communities – CV & Interview Workshop with Migracode:** over 20 Migracode students visiting the Barcelona office for CV workshops, mock interviews, and a talk by a Criteo employee on her engineering career journey
- **Global Criteable Week: Virtual Volunteering Event:** collaboration with the Education Community to create bookmarks encouraging children's reading habits

g. People With Disabilities

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.

In 2024, Criteo made significant strides in disability inclusion through a series of initiatives aimed at fostering accessibility, equity, and empowerment for individuals with disabilities. The DEI team and the Disability Referents in France laid the groundwork by establishing the Global Disability Committee. This committee, composed of key stakeholders from across the people team (PBPs, people ops, TA, employer branding, benefits), internal communications, workplace, and leaders from R&D, product, IIT, and CS, was tasked with defining, monitoring, and evaluating the Company's disability policy.

By integrating Disability Referents into specialized local networks such as the "Réseau des Référents Handicap France" and highlighting their roles internally, Criteo reinforced its commitment to inclusion in France.

Throughout the year, Criteo participated in disability-focused job and apprenticeship fairs, including the Seekube by Hellowork initiative for "Entreprises Handi-accueillantes", while increasing external visibility of its disability policies globally through website and social media campaigns. These efforts were bolstered by global initiatives, such as observing Global Accessibility Awareness Day, led by the Criteable Community. This event provided insights into accessibility strategies and fostering inclusivity within professional and personal spheres.

Recruitment processes were enhanced globally with the inclusion of specific questions in the Recruiter Screen Questionnaire to address reasonable adjustments during the interviewing process and upon joining. These updates aimed to ensure an inclusive experience for all candidates, with sensitive information securely accessible only to dedicated recruiters. Partnerships with organizations like Evenbreak, an online job board specializing in disability-inclusive hiring, and the implementation of a Voluntary Disclosure Dashboard whose objective is to monitor the number of candidates with disabilities applying to Criteo and track their progress through each stage of the recruitment process, further demonstrate Criteo's proactive approach to attracting and supporting talent with disabilities.

Training played a pivotal role in 2024, with tailored programs rolled out for talent acquisition, PBPs, and people ops teams. These programs covered a range of topics, from understanding disability in the workplace and legal frameworks to managing stereotypes, implementing reasonable adjustments, and ensuring a bias-free recruitment, onboarding process, assessments and non-biased feedback.

Awareness-building activities included workshops during the Disability Weeks in early December on accessible yoga, ADHD⁴³ and nutrition, and meditation sessions. Collaborations like the Criteable x BIPOC Communities and Criteable x Women@Criteo Communities explored intersections between disability, race, and gender. Volunteer missions, such as crafting bookmarks for underserved children in India and creating cards for the Koenig Childhood Cancer Foundation in New York, further engaged employees in meaningful advocacy and support efforts.

Through these multifaceted initiatives, Criteo has solidified its dedication to disability inclusion, setting a benchmark for creating a more accessible and equitable workplace, and was recognized externally for these efforts by winning the Disability Inclusion Award by the Diversity in Tech Awards.

Criteable Community

With around 200 members, the Criteable Community provides support for employees with disabilities. Its members are committed to ensuring that employees with disabilities have a positive experience at Criteo and are able to successfully grow in their careers and showcase their creativity, innovation, performance, and success.

In 2024, the Criteable Community achieved the following milestones, amongst other initiatives:

- **Introduction to Disability Workshop**

The Criteable Week began with a powerful workshop led by the Chief Inclusion Officer at Evenbreak. This session provided an in-depth understanding of the barriers to accessibility and practical steps to remove disabling barriers in the workplace. Participants explored dimensions of disability with unique insights from Evenbreak, a job platform run by disabled people for disabled people.

- **Living Authentically Meditation**

⁴³ Attention-deficit/hyperactivity disorder.

The Criteable Community Leader, guided a 30-minute Living Authentically meditation session. Leveraging Headspace subscriptions, participants engaged in a mindfulness practice designed to help them reset their day and connect with their authentic selves.

- **Accessible Yoga (Criteable x BIPOC)**

Criteable collaborated with the BIPOC Community to host a session with a renowned external yoga teacher. This asynchronous yoga event emphasized positivity, accessibility, and self-love, offering an inclusive space for participants to recharge.

- **See Her Thrive (Criteable x Women@Criteo Communities)**

In collaboration with the Women@Criteo Community, this webinar focused on women's mental health. The session addressed the mental load disproportionately borne by women. Participants gained valuable strategies for maintaining mental well-being and recharging during demanding times.

- **ADHD and Nutrition**

An external nutritionist and well-being expert hosted a session exploring the connection between ADHD and nutrition. Attendees learned about energizing nutrients, meal planning strategies, and ADHD-friendly recipes tailored for improved focus and well-being.

- **Volunteer Missions**

Criteable extended its community impact through volunteer missions:

- o India: On December 6th, a virtual event focused on crafting bookmarks for underserved and special needs children.
- o New York: On December 11th, participants crafted cards for the Koenig Childhood Cancer Foundation, creating a heartfelt opportunity to give back.

- **Global Accessibility Awareness Day**

The community hosted a deeply inspiring event. The session highlighted the true essence of accessibility, with actionable strategies for fostering inclusivity and unlocking the potential of diverse team members.

h. Inclusion for the BIPOC 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. Several initiatives were organized in terms of inclusion and diversity applied to the BIPOC Community, including but not limited to:

- Presence of a **DEI Program Manager for the Americas** in the DEI team to specifically support the United States focused on increasing opportunities to attract, retain and develop underrepresented minorities

- **EmpowerU Sponsorship program**, a U.S.-specific, six-month initiative aimed at empowering employees, particularly addressing the underrepresentation of BIPOC individuals. Designed for 15 selected participants, the program offers a comprehensive curriculum that includes goal setting, career mapping, personal development, mental health support, strengths coaching, and culminates in a network closing event. By leveraging Criteo's resources and the guidance of dedicated sponsors, EmpowerU creates a supportive community that fosters continuous learning, celebrates achievements, and equips participants with the skills, knowledge, and confidence needed for individual growth and success. The program's focus on the U.S. allows for an inclusive approach, ensuring its cultural relevance and providing measurable impact in promoting diversity and inclusion.
- **Targeted LinkedIn campaign** in the U.S. to attract talent from ethnic minorities, highlighting our inclusive workplace culture and the diverse opportunities we offer for career growth.

BIPOC Community

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**. Some key achievements of the BIPOC Community in 2024 are presented below:

- **Hispanic Heritage Month – Crafting a Full-Funnel Retail Media Strategy:**

Criteo's experts alongside guests from Ovative and Home Depot, shared strategies to effectively leverage retail media across all funnel stages, enhancing awareness, consideration, and sales.

- **Juneteenth Celebration:**

An external expert from TLC Lion shared his inspiring journey of overcoming challenges as a young Black man in the American South, pursuing education against the odds, and embracing his identity within his workplace and community.

- **Juneteenth Yoga:**

A renowned yoga teacher and body positivity advocate led an accessible yoga session, focusing on mindfulness and empowerment for Criteo employees.

- **Accessible Yoga Collaboration with Criterable Community:**

In a joint effort with Criterable, the BIPOC Community sponsored a virtual accessible yoga session to promote wellness and inclusivity.

- **Covenant House NJ Holiday Dinner Sponsorship:**

On December 18th, the BIPOC Community sponsored a holiday dinner at Covenant House NJ in Newark. The event supported the organization's mission to end youth homelessness, and Criteo employees volunteered to serve festive meals to youth and staff.

- **Wreath-Making Workshop:**

A creative and festive event that brought members together to craft holiday wreaths, fostering community spirit and engagement.

- **Elevating Black Voices Webinar by MyGwork:**

On October 23rd, the community supported MyGwork's webinar dedicated to celebrating and uplifting Black voices in the workplace and beyond. This event provided an inspiring platform to learn and foster empowerment.

i. Non-discrimination and Prevention of Harassment

In 2022, Criteo updated its **Code of Business Conduct & Ethics** (the "Code" 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. However, due to unresolved technical issues with our Learning Management System, we could not accurately track the completion rate for 2024. Looking ahead to 2025, we will launch a new Preventing Harassment training alongside a new Learning Management System to resolve these reporting challenges and ensure more accurate transparency of completions moving forward.

From 2024 on, we have made **Criteo Hires** training mandatory which includes three modules:

- Module 1: a mandatory e-learning on recruitment basics (job description, how to train the panel of interviewers)
- Module 2: a mandatory e-learning on unconscious biases and non-discrimination in recruitment
- Module 3: an online workshop conducted by our L&D team to put into practice what has been learned. This module is compulsory only for new hiring managers and the TA team

In addition, Criteo applies its **equal opportunity approach**⁴⁴ 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.

⁴⁴ Our Diversity, Equity, and Diversity (DEI) Policy is available [here](#).

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.

Hires and promotions of employees above 40 years old	2023	2024
Share of employees over 40 years old in hires	8%	8%
Share of employees over 40 years old in promotions	10%	12%

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 (see "Governance - Section VII.1" section of this Report) points out the importance of respecting freedom of speech. In its **Human Rights Policy**, Criteo also abides several fundamental principles, namely:

- The elimination of forced or compulsory labor
- The abolition of child labor
- The elimination of discrimination in respect of employment and occupation

Criteo's **Human Rights Policy** is available on the Company's IR website [here](#).

V. Sustainable Relationship with Clients and End-users

1. Dialogue with Clients

We collaborate closely with our clients and supply partners to deliver expert consulting, fast and smooth integration, and ongoing campaign management to ensure the optimal use of Criteo's technologies and the achievement of clients' business objectives. With dedicated sales and account strategy, creative services, analytics, and technical services teams, Criteo's clients receive seamless, high-quality support and actionable insight, which are key factors in Criteo's ability to maintain close to 90% client retention every quarter⁴⁵ since 2011.

To continue improving the quality of its services and reinforce trust, Criteo conducts **an annual client satisfaction survey (CSAT Survey)**. Close to 2,100 client contacts responded this year, representing 1,700 of our client accounts. The results of the CSAT survey are shared in real time with employees in charge of client relations, to identify areas for improvement and provide personalized support.

As a testament to Criteo's commitment to client centricity, a team was created in 2023 to drive measurable change based on them.

⁴⁵ The quarterly retention rate measures the percentage of live clients during the previous quarter that continued to be live clients during the current quarter.

More information regarding the products and services offered to our clients by Criteo is available in the presentation of the business model in this Report's introduction.

2. 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. The PEC anticipates and proactively seeks to respond to any ethical concerns before they are raised by our stakeholders or materialized. The PEC steers internal standards regarding Criteo's products, while also acting as a multi-stakeholder and cross-continental forum to discuss and act upon regulatory and industry developments.

In 2024, the committee worked on:

- The implications of doing political advertising and of using personas based on political inclinations, led by the legal commercial team
- The partnership with fast fashion retailers in the context of moving legal context, led by the marketing team
- The connection between the PEC and the Data Governance Guild, led by trust and the compliance team
- The presentation and discussion of AI Product Development guidelines, work led by the product team
- The Presentation and discussion of a study on "How to mitigate gender bias in advertising", led by the AI Lab team (R&D)

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. For example, they address topics such as:

- Content restrictions (restrictions on certain topics such as alcohol, tobacco, gambling, firearms and weapons and on the display of ads on content that promotes harassment, hate speech or violence, or intentionally propagates disinformation)
- Ad placements (pop-ups, disruptive ads, incentivized or rewarded clicks, *etc.*)
- Traffic quality (manipulation of personal information, cookie abuse, *etc.*)
- Transparent supply chain

More information on our Supply Partner Guidelines is available on Criteo's website [here](#).

On the demand side, the **Advertising Guidelines** are a cornerstone of building strong, ethical relationships with our clients. These guidelines not only provide technical and regulatory advice but also define clear boundaries for acceptable use of our platform, ensuring our ethical approach is upheld, for instance regarding:

- Content restrictions, prohibiting harassment, hate speech, adult content, drugs, firearms, deceptive or misleading claims, and content that infringes on intellectual property rights
- Targeting restrictions, such as avoiding the targeting of children below the age of consent for data collection and refraining from using protected or sensitive user characteristics
- Ad format and technical specifications, ensuring compliance with established standards

In addition, Criteo abides by key industry standards.

In June 2022, Criteo signed **IBM's Advertising Fairness Pledge**, joining an initiative that unites agencies, brands, and other industry leaders to raise awareness and improve fairness in marketing campaigns. By signing this pledge, Criteo committed to: "*get the facts on bias in advertising technology, explore the impact of bias on advertising campaigns and practices and be an advocate for Advertising Fairness*" (more details are available [here](#)). This aligns with Criteo's ongoing efforts, including the development of an initial framework in 2023 for studying ad fairness within its privacy-by-design platform. As part of this work, the AI Lab team explored methods to address bias in datasets, successfully developing a "fairness-enforcing" approach to mitigate bias. Additionally, to promote responsible advertising, the team open-sourced a fairness-aware advertising dataset. This is one of the largest fairness-aware tabular datasets released by a company, offering unprecedented insights into where unfairness can occur in the advertising process.

In 2022, Criteo also launched a **research partnership with Inria** (the French National Institute for Research in Digital Science and Technology) to advance responsible AI. The first milestone of this partnership was the creation of a joint project team, "Fairplay," hosted at ENSAE (Institut Polytechnique of Paris). Fairplay's mission is to:

- Study how AI impacts the design of transparent and fair marketplaces
- Balance efficiency with ethical concerns

The Fairplay team combines experts from diverse fields—data science, economics, mathematics, and engineering—drawn from both Criteo and academia. Since its launch, Fairplay has made significant progress in researching ethical online marketplaces.

The contributions, either theoretical or practical, have been published in the best international conferences in machine learning and theoretical computer science. In particular, the joint team published 11 papers at NeurIPS'24 (with a member of Criteo), two papers at ICML'24, and one paper at COLT'24, EC'24, WISE'24 (and forthcoming SODA'25).

Globally speaking, Fairplay's key areas of focus include:

- Resource allocation and agent interaction under ethical constraints, such as fairness or privacy
- Designing mechanisms to encourage data-sharing and build a public good—a universal dataset

- Solving sequential decision problems, like online learning (e.g., bandits) under privacy or fairness constraints

Fairplay is also contributing to innovations in Criteo's products and infrastructure. For example, the team has developed a novel exploration method using bandit techniques to optimize CPU cluster parameters. These advancements continue to enhance ethical and efficient practices in Criteo's operations.

The collaboration between the Criteo AI Lab and the academic community has been further enriched through a series of joint initiatives. These include a weekly internal seminar, where the team regularly hosts faculty members from France and around the world during their visits to Paris, joint participation in workshops and conferences, and the creation of new prospective working groups focused on fairness-related research questions.

3. 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.

a. 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.

As a result, Criteo's personalized ads are not based on the collection of directly identifying information related to a specific user but are usually based on the placement of a revocable cookie or mobile advertising ID on a user device, after collecting consent when requested by law.

Key elements of the Privacy-by-Design approach also include:

- A designated Data Protection Officer (DPO) along with a team of privacy counsels. In fact, being aware of the importance of the subject, Criteo appointed a DPO as early as 2013, i.e., long before the GDPR became effective
- A team of privacy experts, which sits within the product and R&D team. They perform ongoing privacy impact assessments to monitor potential risks during the product lifecycle and proactively mitigate those risks
- Company-wide privacy training to ensure that we build best-in-class products and services

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

b. 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 MD5⁴⁶ and SHA-256⁴⁷ 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.

⁴⁶ Message-Digest Algorithm (MD).

⁴⁷ Secure Hash Algorithm (SHA).

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.

c. 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 EDAA⁴⁸, the FEDMA⁴⁹ Code of Conduct, the IAB⁵⁰ Transparency and Consent Framework, the IAB CCPA⁵¹ framework, the NAI⁵² Code of Conduct, or the Digital Advertising Alliance CCPA⁵³ 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.

All the self-regulatory programs Criteo subscribes to are complementary to applicable U.S., European, and domestic laws. Many national-level governments explicitly support these initiatives. These existing industry initiatives and self-regulations have succeeded so far in building user trust. We strongly believe in the benefits of self-regulation, which enables us to meet client's privacy expectations in a fast-paced internet environment.

We believe that this transparent, user-centric, and controllable approach to privacy empowers users to make better-informed decisions about how we use their data. We require our clients and publishers to provide information to users about our collection and use of data relating to the ads we deliver and monitor. We believe our industry-leading privacy, security, and safety standards for users are key competitive advantages in the market.

d. Industry Leadership

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.

⁴⁸ European Interactive Digital Advertising Alliance.

⁴⁹ Federation of European Data and Marketing.

⁵⁰ Interactive Advertising Bureau.

⁵¹ California Consumer Privacy Act.

⁵² Network Advertising Initiative.

⁵³ California Consumer Privacy Act.

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

- Network Advertising Initiative Standards
- Interactive Advertising Bureau Europe
- Digital Advertising Alliance Self-Regulatory Principles for Online Behavioral Advertising
- European Digital Advertising Alliance's Self-Regulatory Principles
- Digital Advertising Alliance of Canada's Self-Regulatory Principles
- TrustArc

e. Data Privacy at Criteo

The same level of protection is offered for employees' personal data as for users' data since it is subject to the same regulations. In particular, the subcontractor in charge of handling Criteo's e-waste wipes out all confidential and personal information from laptops and such when they collect employees' returned IT material. Moreover, awareness-raising programs regarding cyber-security are carried out for Criteo employees, and in 2021, training contents were repurposed and reorganized to adapt to work-from-home needs and new processes.

In 2024, to enhance our security measures, we implemented **new data classification categories**. This new initiative ensures that the data we own, collect, and share is properly handled, labeled and protected in all our collaborations, both internally and externally.

Governance

The table below provides an overview of the main governance-related policies in Criteo.

Name	Policy content	Scope/exclusions	Accountability	Third-party standards/initiatives (if applicable)	Interests of stakeholder (if applicable)	Policy availability (if applicable)
Criteo's Code of Business Conduct & Ethics	Basic ethical principles and standards that guide employee actions within the	The whole group	Compliance Officer	N/A	Legal team, people team, line managers	Shared internally and published on the Company website
Criteo's Third Party Code of Conduct	Guidance to the Third Parties on how to consider ethics and be in compliance in their work for Criteo	Any person who provides services in connection with Criteo's business and: (i) Its subsidiaries and affiliates (ii) Their respective employees (including their directors, temporary workers and interns) (iii) Their subcontractors, and/or	Compliance Officer	N/A	N/A	Shared internally and published on the Company website
Criteo's Global Anti-Corruption Policy	Defines the Criteo Anti-Corruption Policy and the DOs and DON'Ts in terms of integrity	The whole group as well as third parties working for Criteo	Compliance Officer	Foreign Corrupt Practices Act, UK Bribery Act, French Anti-corruption Laws, and French Anti-corruption Agency	Legal team	Shared internally and published on the Company website
Criteo's Whistleblowing Procedure	Describe the procedure of treatment of whistleblowing reports	The whole group as well as third parties working for Criteo	Compliance Officer	N/A	Internal audit & controls team, people team	Shared internally
Criteo's Third Parties Due Diligence Procedure	Assess and mitigate the corruption and ML-FT risks triggered by Criteo's Third Parties	The whole group excluding charities not falling into the vendor category	Compliance Officer	N/A	Business Owner, vendor master data team, Datamatics, Client Screening Initiative Committee, Customer Account Administration,	Shared internally
Fair Competition Policy	Set out Criteo's principles and expectations regarding matters that may give rise to fair competition	The whole group	Compliance Officer	N/A	N/A	Shared internally

VI. Operating Responsibly

Criteo is committed to conducting its business in compliance with local and international regulations in all the countries it operates and according to high ethical principles. Ethics and compliance are the cornerstones of sustainable value creation, and Criteo's activities are part of this responsible, long-term vision. This commitment is reflected in our **Code**

of **Business Conduct & Ethics**, where ethics and compliance are at the heart of our actions, as a fundamental guarantee of trust and high standards for all our employees, communities, clients, and stakeholders.

1. 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.



2. Global Tax Compliance

As a multinational organization operating in multiple jurisdictions, Criteo is subject to taxation in several jurisdictions around the world with increasingly complex foreign trade regulations and tax laws, the application of which can be uncertain. The amount of taxes Criteo pays in these jurisdictions could increase substantially as a result of changes in the applicable tax principles, including potential new tariffs, increased tax rates, new tax laws or revised interpretations of existing tax laws and precedents, which could have a material adverse effect on the liquidity and results of operations.

Criteo recognizes that by operating in multiple jurisdictions we are subject to taxation and trade regulations around the world with increasingly complexity. Criteo's management is committed to ensuring that all its entities meet their tax obligations and comply with the relevant tax laws in each jurisdiction in accordance with the Code of Business Conduct & Ethics and OECD⁵⁴ guidelines. Criteo also adopts a proactive approach to identifying, evaluating, and monitoring tax risks and managing all identified risks.

For more details regarding tax management, please refer to our most recent [Annual Report on Form 10-K](#).

3. 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.

To mitigate corruption risks, Criteo has implemented several key policies:

- **Code of Business Conduct & Ethics** is our reference document, which sets out the policies and procedures that reflect the Company's commitment to maintaining the highest standards of honesty, integrity, and ethics when conducting Criteo's business. More information is available in the "Governance - Section VII.1" section of this Report.
- **Criteo's Third Party Code of Conduct** guides Criteo's Third Parties on considering ethics and compliance in their work with us. This document is a framework to help them understand better what Criteo expects while conducting business.
- **Global Anti-Corruption Policy** provides further details on our anti-corruption efforts, including definitions and examples of situations that present corruption risk, and the responsibilities of employees and managers to

⁵⁴ Organization for Economic Co-operation and Development (OECD).

comply with the policy and ensure their subordinates do so as well. This policy also summarizes the anti-corruption laws and regulations in the various countries where Criteo conducts business.

- **Gifts, Hospitality & Entertainment Policy** defines the rules for offering or accepting gifts, entertainment, and hospitality. It strictly prohibits employees (and third parties acting on its behalf) from accepting or providing anything of value, directly or indirectly, to government officials, political entities, or private individuals for improper advantages.
- **Conflicts of Interest & Related Person Transaction Policy** provides detailed information on how to identify, avoid and address potential or actual conflicts of interest.
- **Whistleblowing Procedure** provides guidance on the reporting and handling of concerns regarding any violation of laws and regulations, or any misconduct or unethical behavior. It applies to all Criteo employees as well as other third parties working with Criteo specifically selected.
- **Third Parties Due Diligence Procedure** outlines the rules and processes for assessing Criteo's third parties and implementing measures to mitigate risks related to corruption, money laundering, and terrorism financing.

Selected policies are available on the Company's IR website [here](#).

Employee training and awareness

To ensure awareness of anti-corruption matters, all employees are required to regularly complete online training on the Code of Business Conduct & Ethics. This training helps employees identify and manage potential risk situation in their work and includes a specific section on combating corruption.

Criteo regularly evaluates its corruption risks and controls to promote ethical behavior among employees and increase overall awareness. This includes conducting periodic risk mapping for corruption and influence-peddling, using a specialized methodology approved by executive management. As part of this process, Criteo identifies potential risks, assesses existing controls, and takes steps to address any gaps discovered.

The Ethics and Compliance program is implemented by the compliance team, which regularly reports its activities to the GRCC and, ultimately, to the Board of Directors. The Board of Directors, through its Audit Committee – composed of independent, non-executive directors – oversees the program's implementation on a quarterly basis and may conduct independent reviews.

4. 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.

Criteo encourages the use of its **whistleblowing channels**, which include:

- A secure email to Criteo's whistleblowing inbox at speakup@criteo.com

- The Criteo Whistleblower Hotline: a confidential 24/7 service
- The secure Whistleblowing Form, hosted by a third party, allowing reports to be made anonymously

They can also contact the compliance team at ethics@criteo.com.

Concerns reported through these channels are accessible only to the chairperson of Criteo's Audit Committee - an independent director who is neither an employee nor a manager of Criteo - the Chief Legal and Transformation Officer, who is also the Chief Compliance Officer, and finally, the Senior Vice President, Head of Legal and Assistant Corporate Secretary, and the Compliance Manager.

The Chief Compliance Officer may designate additional recipients for the channels described above among members of the compliance team and/or the internal control team.

All reports are kept confidential as required under applicable law.

Although Criteo employees, as well as other third parties working for Criteo, may choose to remain anonymous when using any of these channels, Criteo strongly encourages individuals to identify themselves in order to be able to assure proper follow-up and feedback to them.

Criteo strictly prohibits any type of retaliation under the terms of the Code of Business Conduct & Ethics and the Criteo Whistleblowing Procedure. Individuals who report concerns in good faith are protected from any direct or indirect sanction or detrimental treatment, even if the reported facts are inaccurate or do not result in any action.

Extensive information on the whistleblowing system has been provided to employees in all countries. The Code of Business Conduct & Ethics training raises awareness on whistleblowing and alerts mechanisms. In Q4 2024, Criteo implemented a specialized online training program to enhance People Business Partners' understanding of the Whistleblowing procedure, recognizing their critical role as primary recipients of employee alerts.

Appendix

CSRD Concordance Table

The structure of this 2024 Report is designed to align with the anticipated disclosure requirements of the Corporate Sustainability Reporting Directive (CSRD), which will apply to Criteo starting with the fiscal year ending December 31, 2025. While the report considers the European Sustainability Reporting Standards (ESRS), it is not yet fully compliant with them. With the completion of our double materialities analysis and gap analysis, we will be able to be fully compliant in 2025.

SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
General Information	ESRS 2 – General Disclosures	General disclosures, including information provided under the Application Requirements of topical ESRS listed in ESRS 2 Appendix C.	Message From the CEO
			About this Report
			Disclaimer
			I. About Criteo
			1. Our Activities and Business Model
			2. Our Corporate Governance
			3. Our Culture and Values
			4. Our Approach to CSR
			a. Main CSR Challenges and Materiality Analysis
			b. Our Approach to CSR
			c. Our Sustainability Governance and Dedicated Teams
			d. Relationship with Stakeholders
			e. Key Results and Objectives
			f. Contribution to Sustainable Development Goals
5. Our Awards and Recognitions			

SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
Environmental Information	Not applicable	<i>Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)</i>	N/A
	ESRS E1 – Climate Change	<i>Climate change adaptation Climate change mitigation Energy</i>	II. Reduce Criteo's Environmental Impact 1. Criteo's Approach in Addressing Climate Change 2. Environmental Impact of Data Centers and Hardware 3. Environmental Impact of Offices and Travel a. Green Offices b. Optimizing Use of Office Space and Real Estate Footprint c. Energy Consumption due to Offices d. GHG Emissions due to Offices and Travel 4. Product Sustainability 5. Other Environmental Impact a. Environmental Impact of Subcontractors and Suppliers b. Employees' Green Initiatives
	ESRS E2 – Pollution	<i>pollution of air, water, and soil</i>	Not material
	ESRS E3 -Water and Marine Resources	<i>Resources inflows, including resource use - Resource outflows related to products and services – Waste</i>	c. Natural Resources Consumption and Waste Management
	ESRS E4 – Biodiversity and Ecosystems	<i>biodiversity and ecosystem loss and degradation</i>	Not material
	ESRS E5 – Resource use and Circular Economy	<i>Resources inflows, including resource use Resource outflows related to products and services – Waste</i>	c. Natural Resources Consumption and Waste Management

SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
Social Information	ESRS S1 – Own Workforce	Working Conditions	III. Supporting People Development and Talent Initiatives
			1. Headcount
			2. Recruitment and Terminations
			3. Compensation and Benefits
		Equal Treatment and Opportunities for all	4. Safety and Well-being at Work
			5. Skills Management and Development
			a. Instructors-led Training 2024 Highlights
			b. Online Training 2024 Highlights
			c. Criteo's Coaching Offer
			d. Criteo's Mentoring Offer
			e. Hackathon
			IV. Employee relations, Inclusion, and Diversity at Work
			1. Employee Relations
			a. Internal Communication
	b. Culture of Feedback and Engagement		
	c. Employee Recognition		
	2. Diversity, Inclusion, and Equal Opportunities		
	a. Criteo's Strategy for DEI		
	b. Presentation of Criteo Cares Program		
	c. Gender Equality at Criteo		
d. Inclusion of the LGBTQIA+ Community			
e. Parenthood Support at Criteo			
f. Social Diversity			
g. People with Disabilities			
h. Inclusion for the BIPOC Community			
i. Non-Discrimination and Prevention of Harassment			
ESRS S2- Workers in the value chain	<i>value chain workers connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships</i>	Not material	
ESRS S3 – Affected Communities	<i>affected communities connected with the undertaking's own operations and value chain, including through its products or services, as well as through its business relationships</i>	Not material	
ESRS S4 – Consumer and end-users	<i>Information-related impacts for consumers and/or end-users - Personal safety of consumers and/or end-users - Social inclusion of consumers and/or end-users</i>	V. Sustainable Relationship with Clients and End-Users	
		1. Dialogue with Clients	
		2. Ethics in Our Ads	
		3. Data Privacy and Information Security	
		a. Privacy by Design	
		b. Strict Security Measures	

SUSTAINABILITY STATEMENT	ESRS TOPICS	ESRS SUB-TOPICS	CONCORDANCE
			c. Transparency and Control
			d. Industry Leadership
			e. Data Privacy at Criteo
Governance Information	ESRS G1 – Business conduct	<i>Corporate culture, Protection of whistleblowers, Political engagement, Management of relationships with suppliers, Corruption and bribery</i>	VI. Operating Responsibly
			1. Code of Business Conduct & Ethics
			2. Global Tax Compliance
			3. Anti-Corruption
			4. Whistleblowing and Alert Mechanisms
Appendix	Appendix	<i>Appendix</i>	CSRD Concordance Table
			UNSDGs Concordance Table
			TCFD Concordance Table
			SASB Concordance Table
			Methodological Note



UNSDGs Concordance Table

Quality Education (4)

Goal: ensure equal access to quality education for all and promote lifelong learning opportunities

Criteo's contribution:

- Investing in educational and training initiatives that help our employees continually elevate their skills and create new career and growth opportunities
- Expanding access to education through our "Education Community" made of around 250 members who support, guide, and encourage under-represented people in the employment market
- Partnering with numerous schools in France and participating in career forums each year
- Encouraging community involvement by providing access to Volunteer Paid Days to all employees

Report sections: see "Social - Section IV" and "Social - Section V.2.e" sections of this Report.

Gender Equality (5)

Goal: achieve gender equality and empower all women and girls

Criteo's contribution:

- Committed to have 26% of women in Tech roles by 2030
- Signatory member of the Tech for Good Call
- Committed to ensuring that the percentage of women promoted is proportionate to their representation in the Company
- Women@Criteo Community: an inclusive Employee Resource Group promoting the advancement of women in the workplace through training, networking, and mentorship

- Committed to DEI in everything we do at Criteo, as highlighted in our [DEI policy](#)

Report sections: see "Social - Section V.2.b" section of this Report.

Decent Work and Economic Growth (8)

Goal: promote inclusive and sustainable economic growth, employment and decent work for all

Criteo's contribution:

- Promote a respectful, safe, and inclusive work environment wherever we do business
- The health, wellness, and safety of our employees are a top priority
- Flexible working policies, best-in-class health and well-being benefits to enhance our employees' quality of life
- Equal opportunities for all employees and job applicants, with no tolerance of discrimination of any kind
- Respect for human rights throughout our business with our [Human Rights policy](#)

Report sections: see "Social - Section III. 4" and "Social - Section III" sections of this Report.

Industry, Innovation, and Infrastructure (9)

Goal: build resilient infrastructure, promote sustainable industrialization, and foster innovation

Criteo's contribution:

- Support a fair and open Internet that enables discovery, innovation, and choice
- Pioneering innovations in computational advertising
- Fundamental and applied scientific leadership through published research, product innovations, and new technologies from our AI Lab

Report sections: see "Social - Section VI" and "Governance - Section VII" sections of this Report.

Reduced Inequalities (10)

Goal: reduce inequality within and among countries

Criteo's contribution:

- Diverse organization with more than 90 nationalities represented in Criteo's global workforce in 2023
- Equal opportunity approach which strictly forbids all forms of discrimination in recruitments, promotions, salary increases, and benefits
- Our BIPOC Community promoting initiatives to fight against racial inequalities and racism
- Our EmpowerU program empowering high performers from underrepresented minorities
- Our [Global Disability policy](#) ensuring our "Criteable Community" is focused on improving the experience of employees who have disabilities

Report sections: see "Social - Section V.2" section of this Report.

Responsible Consumption and Production (12)

Goal: ensure sustainable consumption and production patterns

Criteo's contribution:

- Prominent member of the Tech for Good initiative
- Partnerships with other industry stakeholders to define development models that put technology at the service of a sustainable future
- Commitment to deliver a trusted and safe advertising experience to marketers and media-owners
- Supply Partner Guidelines and Advertising Guidelines
- High level security and data privacy across our portfolio of products, technologies, and services

Report sections: see "Social - Section VI.2" section of this Report.

Climate Action (13)

Goal: take urgent action to combat climate change and its impacts

Criteo's contribution:

- Published our environmental strategy and implemented a GHG emissions reduction plan
- Established carbon reduction targets and trajectories, validated by the SBTi
- Signed the Planet Tech'Care manifesto in 2020
- Aligned with the recommendations of the TCFD framework and responded to the CDP Questionnaire
- All data centers use 100% decarbonized or offset energy
- Committed to reducing our carbon footprint by limiting travel and implementing green office practices with our Green Community

Report sections: see "Environment - Section II" section of this Report.

Partnership for the Goals (17)

Goal: revitalize the global partnership for sustainable development

Criteo's contribution:

- Our partnerships with local charities – Education and mentorship
- Our volunteering and giving platform (GIVING by Alaya/Benevity) – Social good
- Our Tech for Good Commitment – Gender Equality
- Our commitment to the carbon reduction targets through the SBTi, the TCFD framework, CDP Questionnaire – Environment, EcoVadis, and CSA S&P Global questionnaire
- Our commitment with the French association L'Autre Cercle (LGBTQIA+ Charter)

Report sections: see "Social - Section IV" and "Social - Section V.2" sections of this Report.

TCFD Concordance Table

Introduction

In 2022, Criteo formalized its long-term, global environment strategy, paving the way for ambitious short-term and long-term action plans and energy reduction goals. In 2024, Criteo also responded to the CDP Questionnaire and received the "D" rating. Aligning with the TCFD framework is intended to help investors, lenders, and other stakeholders make more informed decisions and to understand how the Company manages, identifies, and addresses climate-related risks.

Governance

Criteo is dedicated to maintaining a robust governance process to oversee and manage the Company's sustainability efforts and energy reduction goals. The Nomination and Corporate Governance Committee ("NCGC") of our Board of Directors receives annual updates on sustainability performance and progress from executive management, led by the Senior Vice President of Talent Development and DEI.

Internally, the Sustainability Committee, chaired by the Chief People Officer, guides the sustainability agenda and priorities. It also advises the GRCC on the Company's ESG-related goals, strategies, and commitments, including climate risks and opportunities, human rights, community impact, social responsibility, and diversity and inclusion.

Description	References
Board's oversight of climate-related risks and opportunities	CDP Climate Change Questionnaire : C4.1.1
Management's role in assessing and managing climate related risks and opportunities	CDP Climate Change Questionnaire : 4.3.1

Strategy

Criteo has an Enterprise Risk Mapping (ERM) process in place, which is updated on an annual basis to identify and assess the risks that could materially impact the Company and its financial performance. In addition, Criteo seeks to understand and anticipate how climate-related risks and opportunities may have an impact on its business across the short, medium and long-term.

Description	References
Climate related risks and opportunities identified over short-term, medium-term and long-term horizon	CDP Climate Change Questionnaire: 2.1
Impact on businesses, strategy and financial planning	CDP Questionnaire: 2.2.1, 3.1, 5.1, 5.4
Impact of different scenarios, including a 2 degree C scenario	CDP Questionnaire: 5.1, 5.2

Risk Management

While we are still implementing a dedicated process for identifying and assessing climate-related risks, the Enterprise Risk Management (ERM) process in place aims to identify and monitor material risks for the Company. In connection therewith, material climate-related risks and their potential impacts are reviewed and assessed.

Our future climate-related risks and opportunity assessment will leverage this existing assessment to provide a detailed and comprehensive view on climate-related risks and opportunities to ensure a proper monitoring of the mitigation plans.

Description	References
Process for identifying and assessing climate related risks	CDP Questionnaire: 2.1, 2.2, 2.2.1, 2.2.2, 2.4, 2.2.7
Processes for managing climate-related risks	CDP Climate Change Questionnaire : C.2.2g, C.2.3, C.2.3.b
Integration into overall risk management	CDP Climate Change Questionnaire: 2.2.2.10, 3.1.2 CDP Water Questionnaire: 9.3

Metrics and Targets

KPIs and targets are essential for monitoring progress and evaluating the effectiveness of environmental initiatives. In 2024, following our GHG assessment, we published carbon-emission reduction targets to achieve by 2030, aligned with the 1.5°C scenario of the Paris Agreement. These targets were set in accordance with the SBTi's recommendations and have been approved by the SBTi.

Description	References
Metrics used by the organization to assess climate related risks and opportunities	CDP Climate Change Questionnaire: 2.2.2, 2.2.2.7, 2.2.2.16
Scope 1, 2 and 3 GHG emissions	CDP Climate Change Questionnaire: 7.2, 7.5, 7.6, 7.7, 7.8
Targets used and performance against targets	CDP Climate Change Questionnaire: 4.10.2, 7.53, 7.54, 13.2

SASB Concordance Table⁵⁵

Topic	SASB Code	Accounting Metric	Category	Unit of Measure	Disclosure
Environmental Footprint of Hardware Infrastructure	TC-SI-130a.1	(1) Total energy consumed (2) Percentage grid electricity (3) Percentage renewable	Quantitative	(1), (2): Gigajoules (GJ) (3): Percentage (%)	See "Environment - Section II" section of this Report
	TC-SI-130a.2	(1) Total water withdrawn (2) Total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	(1) Thousand cubic meters (m ³) (2) Percentage (%)	Data not currently disclosed at Group level
	TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion and Analysis	N/A	See "Environment - Section II.1-2" section of this Report
Data Privacy & Freedom of Expression	TC-SI-220a.1	Description of policies and practices relating to behavioral advertising and user privacy	Discussion and Analysis	N/A	See "Social - Section V.2.3"; "Governance - Section VI.1" sections of this Report
	TC-SI-220a.2	Number of users whose information is used for secondary purposes	Quantitative	Number	Please refer to this page
	TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Quantitative	Reporting currency	Please refer to our latest Annual Report on Form 10-K for material litigation.
	TC-SI-220a.4	(1) Number of law enforcement requests for user information (2) Number of users whose information was requested (3) Percentage resulting in disclosure	Quantitative	(1), (2): Number (3) Percentage (%)	Criteo does not publicly report this information as it is confidential
	TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Discussion and Analysis	N/A	None of our core products and services are subject to government required monitoring, blocking, content filtering, or censoring

⁵⁵ Note: Regulations in most countries where Criteo is located forbid the tracking of employee information related to their racial/ethnic group. As such, only gender data is available at the Company level.

Data Security	TC-SI-230a.1	(1) Number of data breaches (2) Percentage involving personally identifiable information (PII) (3) Number of users affected	Quantitative	(1) Number (2) Percentage (%) (3) Number	In 2024, we had zero data security breaches that required disclosure in our public SEC filings
	TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	N/A	See "Governance - Section VI" section of this Report
Recruiting & Managing a Global, Diverse & Skilled Workforce	TC-SI-330a.1	Percentage of employees that are: (1) Foreign nationals (2) Located offshore	Quantitative	Percentage (%)	Criteo is a global company. Approximately 73% of employees work in offices outside of France. As of December 31, 2024, Criteo has approximately 19% of employees defined as foreign nationals who have work visas in the country in which he/she is employed. Compared to 22.5% in 2023
	TC-SI-330a.2	Employee engagement as a percentage	Quantitative	Percentage (%)	See "Social - Section IV.2.b" section of this Report
	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for: (1) Management (2) Technical staff (3) All other employees	Quantitative	Percentage (%)	See "Social - Section IV.2.a" section of this Report Note: Regulations in most countries where Criteo is located forbid the tracking of employee information related to their racial/ethnic group. As such, only gender data is available at the Company level.
Intellectual Property Protection & Competitive Behavior	TC-SI-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Quantitative	Reporting currency	Please refer to our latest Annual Report on Form 10-K
Managing Systemic Risks from Technology Disruptions	TC-SI-550a.1	(1) Number of performance issues (2) Number of service disruptions (3) Total client downtime	Quantitative	(1), (2): Number (3): Days	Criteo does not publicly report this information due to its sensitive and proprietary nature
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	N/A	Please refer to our latest Annual Report on Form 10-K

Methodological Note

Criteo's CSR Report constitutes the Non-Financial Performance Statement to be established by Criteo in accordance with Article L.225-102-1 of the French Commercial Code (in French "Déclaration de Performance Extra-Financière", or "DPEF").

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).

Relevance of CSR indicators

Criteo selects its CSR indicators based on:

- Benchmarking CSR best practices among leading IT-sector companies
- Analyzing workforce, environmental, and social impacts and risks related to Criteo's operations
- Adhering to the SASB standard
- Including specific indicators aligned with Criteo's Human Resources policies
- Conducting an initial double materiality analysis (DMA) and gap analysis to meet CSRD requirements

Each year, the list of CSR indicators is reviewed and updated. This process incorporates feedback from Criteo's sustainability team, contributors, and proofreaders, while addressing new focus areas in the report and meeting stakeholder expectations.

Internal and external controls

There are controls on the data collected during the CSR reporting process. For each KPI, a dedicated person oversees data control and performs consistency tests listed within Criteo's reporting procedure. For instance, to avoid discrepancies during the KPI reporting process, each validation manager performs the following controls:

- Lack of data: verification of the presence of the overall data. Lack of data must be justified by the person in charge of the KPI.
- Data consistency: verification of data consistency compared to last year's data. Significant annual variations must be justified and documented.

Criteo also mandates an independent third-party body to verify and validate the reliability of Criteo CSR information (audit). The nature of verification work conducted, and external conclusions are available on demand.

CSR indicators – Calculation and estimation methods

- **Headcount:**

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

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

All gender-related data featured in the Headcount section of this Report is self-declared under three categories: male, female, not declared. This data was not collected specifically for the purpose of this Report but gathered via our internal instances, reports, or interfaces where "Gender" is used (for example, in some countries, for payroll purposes, social security, or as a legal requirement or into benefits *etc.*). The category "not declared" refers to all employees that did not answer either "male" or "female".

- **Training:**

Training hours for all employees, including those who left the Company during the reporting period, are included in the calculation. However, training hours for subcontractors or consultants trained by Criteo are not counted.

Face-to-face training hours

Training data is collected from Criteo's Learning Management System tool.

Are considered:

- The number of training hours that employees attended (not the number of training hours that employees registered for) and that were reported by PBP to the L&D team
- Individual coaching or state of the art co-development sessions
- Management and leadership development modalities

Are excluded:

- Seminars, conferences, working groups, open days
- On-boarding training (FlyCriteo program) and compliance training
- Anti-harassment, Anti-corruption for high-risk population training, and Code of Business Conduct & Ethics pieces of training

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

E-learning training hours

Given the wide range of e-learning platforms available to Criteo employees (such as Coursera, Speexx, LinkedIn Learning et Learning Quest, etc.), we have adapted our tracking and reporting methods for e-learning hours to align with each platform's unique approach to learning, course structure, and user activity tracking systems.

Although this approach results in varying calculation methods across platforms, it ensures that the most appropriate method is used in each case to accurately report the training hours completed by employees. Commonly used methods include:

- We report only training contents completed up to a certain point (with minimal and sometimes maximal duration thresholds set up depending on the type of course provided), for instance:
 - Micro-learning: recorded from one minute and on (LinkedIn Learning, Learning Quest and *etc.*). As the micro-learning platforms are composed of short contents focused on key-points, a limit of one-min has been set up.
 - MOOC learning: recorded from one hour to max 25 hours (Coursera). As the MOOC courses should take between 19 and 25 hours, a limit of 25 hours for this type of e-learning has been set to make sure it mostly includes time spent on learning content. Above 25 hours will include most of the time quizzes, exams or discussion forums.
- For e-learning courses from the product team, only the prescribed duration is reported, not the actual time spent online.
- Language training courses have no minimum duration requirement, as we believe language learning progress should be measured from the very beginning.

The following is excluded from training hours:

- Time logged in the LMS
- Training content below the minimal duration or above the maximum duration
- Training content started during the previous financial year
- Training content only related to an assessment or quiz
- Training content only based on "document reading" or "link to document"
- Training content related to basic IT application tutorials for all employees such as expenses reports, Human Resources Information System
- Programs and content pushed/prescribed to all employees for compliance purposes or for IT application up skill

Whenever a significant change in methodology occurs, N-1 data for training may be updated according to the new methodology to allow for comparability.

Coaching

To calculate the number of coached employees, the number of employees who participate in at least one coaching session, not the number of employees who are registered, is taken into account.

Employees who have attended more than one coaching session during the reporting period are counted only once.

In case of coaching related to sessions running over two consecutive years, only sessions completed in year N should be considered. If a session has started during year N and finishes in year N+1, then it is included in year N+1 figures.

- **Other KPIs:**

- **Business trips:** Data provided by our business travel agency includes all air travel scope as well as train trips.
- **Commuting:** Employee commuting data, calculated based on extrapolations of travel between home and workplace, carries a high level of uncertainty.
- **Electricity consumption of offices:** Where the value for one or several months is missing, an extrapolation is made based on the months available.
- **Electricity consumption of DCs:** Actual data is supplied by Criteo's data room providers. Electricity consumption includes all DCs except POPs for which power needs are negligible.
- **Amount of renewable energy consumed for DCs:** This data is calculated based on the amount of energy supplied from decarbonized sources or offset through certificates.
- **Amount of renewable energy consumed for offices:** The national renewable energy rates used are from the International Energy Agency (IAE).
- **CO₂ emissions:** Emission coefficients per country from ADEME database have been used for the calculation. CO₂ emissions are calculated using the SWEEP tool.
- **Number of employees who participated in CSR events organized through Criteo Cares:** For each event the number of people who attended is counted, and the indicator consists of consolidated figures for each event. This indicator thus covers the total participation number and not the number of individual attendances.

Other information: This Report does not contain disclosures on the following information mentioned under article L. 225-102-1 of the French Commercial Code, which was considered either nonmaterial as part of the materiality analysis presented in the introduction to this Report, or non-relevant regarding Criteo's activities:

- "Food waste"
- "Food insecurity"
- "Animal well-being"
- "Responsible food choices"
- "Promotion of physical and sportive activities"
- "Promotion of the link between the French Nation and the army and support to employees' engaged in the army reserve"