

HAVIAS

ANTI-CORRUPTION CODE



Dear all,

Trust is the cornerstone of our relationships with clients, suppliers, partners, and teams. Ethics and integrity are not just guiding principles; they are the very foundation of our collective success and the trust we strive to preserve.

This anti-corruption Code is a reflection of our unwavering commitment to prevent, detect, and address all forms of corruption.

At Havas, **we enforce a zero-tolerance approach to corruption in every form.** Whether in our internal or external relationships, it is our duty to remain vigilant, uphold our ethical standards, and adhere to the laws in the countries where we operate.

The fight against corruption is a shared responsibility. Every employee plays a key role in safeguarding our integrity and upholding our reputation as a responsible organization. This Code is both a guide to our daily actions and a testament to our dedication.

We count on each of you to bring these principles into practice every day, ensuring that Havas remains a beacon of ethics and responsibility while strengthening our position in the marketplace.

Yours sincerely

Yannick Bolloré

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Introduction

Committing an act of corruption is a serious offence that can have major legal and financial consequences for Havas SAS and its French and foreign subsidiaries ("the Havas Group" or "the Group") and cause lasting damage to their reputation.

For several years, new national and international laws and regulations have been multiplied to fight against corruption. In this context the Group has developed a specific compliance program to prevent and detect acts of corruption in accordance with the article 17 of the "Sapin II" Law dated December 9, 2016. This anti-corruption Code ("the Code") is a mandatory part of that program.

In compliance with the Sapin II Law, the Code is attached to the internal rules of each Havas Group entity in France. It is also applicable to the international subsidiaries, subject to any adjustments required to comply with local laws and regulations.

Especially, this Code's goal is to remind to all Group employees of:

- The principles related to the fight against corruption and influence peddling.
- The right behavior to adopt.

Please note that if local legislation is stricter than the principles set out in this Code, the stricter rule will apply.

Who is the anti-corruption Code intended for?

The Code applies to all internal employees¹ of the Group in France and abroad, occasional and external workers² employed by the Group in France and abroad (collectively "the Employees").

The anti-corruption Code may be consulted on the Group's intranet.

All of our business partners (suppliers, service providers, intermediaries, agents, sub-contractors, co-contractors, etc.) are required to comply with the Code's principles or at least equivalent standards, and to promote the application of the Code's principles among their own partners.

The Code is not exhaustive and does not cover all possible situations that Employees may face. It describes the rules that should guide their decisions. You should read this Code carefully, ensure that you understand the rules and use your best judgment to determine how to behave to the various situations that may happen.

A training program has also been developed to complete the framework in place to prevent corruption and influence peddling, and e-learning modules have been created to enable you to better understand the issues and risks at stake, and acquire the relevant best practices.

¹ **Internal employee** means any person who has an employment contract with the Group.

² **Occasional and external worker** means any person (intern, temporary worker, service provider) assigned to any workplace of a Group company.

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1. WHAT IS CORRUPTION
AND INFLUENCE PEDDLING?

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A. Corruption

The generic term "corruption" covers both corruption and influence peddling.

An act of corruption is committed when an undue gift or advantage is offered or paid to a private individual or a public official in return for the performance, delay or omission by that person of an act within the scope of his or her duties.

Public corruption involves persons holding public office ("Public officials").

Private corruption involves only private companies or their employees or representatives.

WHAT IS A PUBLIC OFFICIAL?

The term of "Public official" must be interpreted widely. It targets any person holding the public authority, entrusted with a public service mission, or holding a public elected mandate for themselves or for others.

Please note that any person should be considered as a Public official if the local legislation defines it as such.

There are **two schemes of corruption**:

Active corruption occurs when a person provides or promises to provide an undue gift or advantage.

An undue gift or advantage can take various forms such as:

- Financial flows whose origin may be concealed (consulting fees, donations or sponsorship arrangements, etc.) and means of payment may be as follows: cash, bank transfer or any other method
- Other benefits, such as free tickets for entertainment or other events, complimentary travel, gifts, the hiring of family members or friends, etc.

An undue gift or advantage can also take the form of preferential treatment, the signature of a contract, the disclosure of confidential information, or a guilty inaction in situations where a person turns a blind eye instead of intervening.

Q. A friend of yours has just been appointed mayor. Your agency has responded to a call for tenders for a sports event. You meet him in the street and offer him tickets tickets for this event in exchange for the administrative authorizations required to organize the event.

Does this constitute active bribery?

A. Yes, the employee offers the public official tickets for the sporting event in order to obtain an advantage such as the delivery of licenses to organize the event.

Passive corruption occurs when a person accepts or requests an undue gift or advantage in exchange for agreeing to act or not to act in a given situation.

Corruption occurs when the person accepts the promise of an undue gift or advantage, even if it is not ultimately provided.

- A **bribe** is defined as money or an item of value given or promised in order to obtain favorable treatment. For example, a donation to a charity chosen by a Public official with whom we hope to sign a new business contract would qualify as a bribe.
- A **kickback** is payment made or received in exchange for a contract, favorable treatment or a commercial transaction. For example, if one of our suppliers were to pay a percentage of our purchase price to one of our employees in exchange for maintaining the business relationship, this would qualify as a kickback.
- A **facilitation** payment (also referred to as a grease payment) is a payment made to a Public official to speed up or guarantee the successful outcome of certain compulsory administrative or legal formalities. For example, if a small amount was paid to a junior Public official to release goods held up in customs, this would qualify as a facilitating payment.
If you are asked to make a facilitating payment, you should immediately contact your manager or the Group General Counsel.

INDICATORS OF CORRUPTION

- **Refusal to disclose a relationship or interests with Public officials.**
 - **Relationship between a third-party and a Public official.**
 - **Third-party based in a country that has a reputation for corrupt practices.**
 - **Request for fees or commissions to be paid in a different country, to a third-party, in cash or by untraceable fund transfer.**
 - **A partner that is heavily dependent on political or government contacts.**
 - **Vague or non-specific payment descriptions in the accounting records.**
 - **Documents that conceal the true identity of a local representative or agent.**
 - **Payment descriptions that do not correspond to the account in which the payments are recorded.**
 - **Multi purpose or "miscellaneous" accounts that may be used to hide undue payments.**
 - **Overbilling or fake invoices.**
 - **Failure to comply with applicable laws or to obtain the required environmental permits.**
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B. Influence peddling

Influence peddling occurs when a beneficiary of an undue gift or advantage uses his or her perceived or real influence to obtain a favorable decision from a Public authority

Three parties are involved:

- The party that provides the gifts or advantages.
- The party that uses his or her influence or connections.
- The party that has the authority to make the decision (public authority, government department, magistrate, etc.).

Corruption and influence peddling have in common that the corrupt person (the person who receives the undue gifts or advantages) breaches his or her duty of integrity by monetizing the power or influence thanks to his or her function for his or her own direct or indirect personal profit.

C. Penalties

Corruption and influence peddling are intentional offenses and any Employee who commits such an offense faces the risk of criminal prosecution and, in some cases, may also cause legal proceedings to be brought against Group companies. In all cases, the commission of an act of corruption or influence peddling by an Employee will necessarily have an adverse effect on the Group's reputation and business.

In France, **the penalties for corruption** are as follows:

- **Individuals:** a 5 to 10-year prison term and a fine of €0.5 million to €1 million or double the proceeds of the crime, whichever is higher.
- **Legal entities:** a fine of €2.5 million to €5 million or double the proceeds of the crime, whichever is higher, plus other penalties.

These same penalties also apply for influence peddling.

Q. You are awaiting a decision from an administrative authority regarding one of your advertising projects. You also need a law firm to defend you before the administrative tribunal. You decide to call on the services of a public law attorney who is also the son of the President of this administrative authority.

Does this constitute influence peddling?

A. Yes, this situation can be qualified as influence peddling. In fact, to characterize influence peddling it is not necessary to show that "something of value" has been given by the "briber" to the "corrupt". It is sufficient to demonstrate a capacity to influence, motivated by the fact that the son of the President of the administrative authority was awarded a contract at the same time.

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2. PRINCIPLES OF ACTION AND EXPECTED BEHAVIORS

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This section sets out the rules and all the needed information that all Employees must understand and follow in the course of their work to prevent and fight against corruption.

A. Gifts and invitations

Offering gifts and invitations is often seen as a courtesy designed to strengthen a commercial relationship. The nature of the gift or invitation varies considerably depending on factors such as the country, its traditions, the company and the commercial relationship.

However, anti-corruption rules ban promises of gifts, invitations and other items of value made to third parties in order to obtain an unfair advantage or unfairly influence an official action.

Offering or accepting gifts or invitations may be considered as a blatant form of corruption, particularly when the gift or invitation is offered in connection with a commercial transaction or an application for an authorization or permit submitted to a Public official.

Reinforced traceability and documentation will be performed to guarantee the transparency of these practices.

Rules:

- Gifts and invitations which, if accepted, could make the Employee indebted and/or could influence his or her decision-making process in an unnatural way must be refused.

- You may offer or accept a gift or invitation provided that:
 - It has a professional purpose.
 - Its value is reasonable.
 - It complies with local practices.
 - It is not offered, directly or indirectly, in exchange for a specific advantage or action.
 - It only concerns you, as an Employee, or your business partner, to the exclusion of your family and your partner's family or other partners.
 - It is not offered concurrently with any major decision (for example, during a tender, competitive bidding, contract renewal...).

The circumstances in which the gift or invitation is offered should not give rise to suspicions of corruption, even after the fact. You should therefore pay close attention to the context and the meaning that could be attributed to the gift or invitation, making it very clear that nothing is expected in return.

 - Neither you nor the Group would be embarrassed if it was made public.
 - The business partner who invites you to an event will also be present or represented at the event.

- Cash is banned but also gift cards or vouchers.

Each Group subsidiary defines and formalizes policies about gifts and invitations, setting thresholds in line with local practices. These policies will be submitted to the Chief Compliance Officer for approval.

The thresholds set will take into account the local regulations and any factor that may justify them (geographical areas, living standard). If the thresholds are exceeded, all gifts offered or received must be approved by your manager and recorded in a specific register at the level of the Agency to maintain the traceability.

In all cases, if local legislation is stricter than the above guidelines, you should comply with the stricter rules.

Q. Following the win of a tender, your new client offers you a valuable watch to congratulate you.

Does this gift constitute an act of corruption?

A. Yes, this situation could be considered as an act of corruption, given the value of the gift, which could be assimilated as a counterpart of the communication services provided, even if it is only granted afterwards. Indeed, the law covers undue advantages offered “before, during or after”. You must refuse the gift politely, explaining why and referring to your company’s Anti-Corruption Code.

B. Facilitation payments

Facilitation payments are cash payments (usually small amounts) requested or accepted by Public officials in order to obtain or speed up the completion of certain administrative acts or formalities (processing of government documents, issuance of authorizations or permits, etc.).

Facilitating payments are illegal in most countries.

Rules:

- The Havas Group bans facilitating payments even when they are allowed under local law.

We nonetheless recognize that in certain regions of the world, in exceptional circumstances you may have to make this type of payment to avoid you or one of your family members suffering imminent physical harm or abusive and unjustified detention. In such a case, you must inform your line manager without delay.

Q1. The shooting of a singer's performance for the sport event opening ceremony has been delayed due to difficulty in obtaining administrative authorization. One of the public officials requests you a payment of 300 euros in cash in exchange for obtaining the authorization within 2 days. You agree to make this payment, thinking that it will please your agency's management.

Does this constitute a facilitation payment?

R1. Yes, by accepting such a request from a public official in order to obtain or speed up the progress of a shoot, regardless of the amount at stake, even low, you are making a facilitation payment prohibited by the Group.

Q2. An employee sent on a mission abroad has his passport unduly detained by a border police officer, who disputes the validity of the visa and then suggests that, in exchange for a low cash payment, he would agree to unlock the situation.

Does this constitute a facilitation payment?

R2. You should explain to your interlocutor that your company forbids this type of arrangement and politely refuse, even if the blockage persists and you are forced to turn back.

C. Conflict of interests

A **conflict of interest** refers to any situation in which the personal interests of a Group Employee may conflict with the interests of the Havas Group.

Personal interests refers to an employee's individual motivation which takes precedence over the interests of the Group. The conflict of interest then lies in personal interests which are likely to influence or seemingly influence the way an employee carries out the duties and responsibilities entrusted to him or her by the Group.

Such a situation could arise, for example, if an Employee:

- Negotiates on behalf of the Havas Group a contract in respect of which he or she draws a personal interest whether directly or by way of a middleperson and whether this personal interest is immediate or future;
- Holds a financial interest (shares, stocks, etc.) in any activity from any customer, supplier, business partner or competitor of the Havas Group;
- Carries out an activity, whether paid or voluntarily, on behalf of this third-party, e.g., as an employee, adviser, attorney, broker, etc.

Conflicts of interest may also conceal the existence of bribery; it is therefore essential for all Group employees to be vigilant about the potential occurrence of any conflicts of interest.

Rules:

- You must refrain from favorizing any personal, financial or familial interest that might prevent them from serving the best interests of the Havas Group and cast a doubt on their integrity.
- In particular, you should refrain from:
 - Acquiring shares or financial interests in activity of any customer, supplier, service provider, business partner or competitor of the Havas Group, without prior authorization

— Carrying out professional missions or activities, whether paid or voluntary, outside the Group, without prior authorization from their manager.

- Any employee who happens to be facing a potential or established situation of conflict of interest must immediately inform his/her manager and Chief Compliance Officer as outlined in the detailed procedure hereinafter. In addition, he/she must refrain from being involved in any kind of relationship the Havas Group might be engaged into with the third-party concerned, unless a solution has been found.

DETECTING A CONFLICT OF INTEREST

What questions should I ask myself?

If I follow this course of action:

- Do I risk compromising the independence of my judgment?
- Will I feel in debt of a third-party?
- Does my conduct risks being perceived as «somehow inappropriate» or even dishonest?
- Could it seem inappropriate or raise doubts about my loyalty to the Group's interests?

Should you answer «yes» to any of these questions then you may be facing a situation of conflict of interest, proven or perceived as such. You should immediately seek advice by reporting this situation to your manager and your Chief Compliance Officer.

Q. You manage the advertising budget for a record label. This year, you are planning to use a significant portion of this budget to purchase services from an Internet search engine provider. You and your spouse both hold shares in this company.

Could this be considered as giving rise to a conflict of interests?

A. Yes. Your choice to spend a significant portion of the advertising budget with this company could appear to be motivated by your personal investment. Don't forget that our commitment to integrity and accountability obliges you to disclose your investment to your line manager or the Compliance Department (or the Chief Compliance Officer) and to seek their advice about whether you should go ahead with your decision as well as obtaining guidance about the procedure to be followed.

D. Hiring

Hiring a new Employee within the Havas Group could potentially constitute an act of corruption if the Group is granted an undue advantage by a third-party (such as the promise of a future contractual relationship or the exercise of influence over an administrative decision) in exchange for recruiting a specific candidate.

Rules:

- Any undue advantage granted by a third-party for the recruitment of an Employee is prohibited.

Q. During the hiring period, the company receives the CV of the head of an administration's husband with whom we're bidding. He has all the necessary skills and has conducted three interviews in which none of the people involved in the process took part. The HR department considers that he is the best candidate and can therefore be hired.

Does this constitute an act of corruption?

A. At first glance, no. The candidate's skills meet the requirements of the position to be filled, and the hiring decision is made impartially and disconnected from the contract. However, this situation intrinsically presents a risk, and you need to be able to provide the authorities evidence of your good faith and the impartiality of your choice.

E. Business partners

A risk of corruption exists whenever the Havas Group is in a **business relationship with various partners** in the normal course of its business activities.

In some circumstances, a company may be held legally liable for acts of corruption committed by its business partner.

In the normal course of business, Group Employees deal with many different business partners such as distributors, intermediaries (sales agents, referral agents and negotiators, etc.), suppliers, subcontractors and clients.

These dealings must be conducted in compliance with the Group's internal procedures.

Rules:

- Before entering into a business relationship with a partner, you should carry out appropriate and proportionate due diligence checks with regard to the partner's specific situation, covering such issues as reputation, current or past legal proceedings, skills and resources in the required field, and current or past contractual relationships with a Public official.
- In the specific case of intermediaries, if there are any suspicious indications you should rule out working with the intermediary concerned. A potential cause for concern may exist if the intermediary:
 - Does not appear to have the necessary expertise or lacks the necessary staff;
 - Has been appointed or recommended by a Public official;
 - Asks for remaining anonymous or demonstrates a lack of transparency;
 - Asks to be paid in cash, in advance or in a jurisdiction other than their country of residence or business location;
 - Wants to charge abnormally high fees compared to the value of the services provided.
 - Claims reimbursement of expenses that are unusually high or are not supported by reliable documentation;

- All business relationships with partners must be governed by a contract signed by both parties. Especially, when the provided services involves the intermediary entering into direct or indirect contact with a Public official, contracts with intermediaries must be signed by the highest-ranking and duly authorized executive within the Group company.
- Contracts with business partners should include specific clauses certifying that the co-contractor complies with anti-corruption laws and regulations and providing that the contract will be terminated if these laws or regulations are breached.
- Payments to a business partner must always be appropriate and reasonable in relation to the service provided. It is important to be particularly vigilant when payments are made to a foreign bank account.
- No payment should be made:
 - in cash;
 - without being supported by an agreement signed by both parties.
- The payments should be made based on a duly approved invoice, preferably by bank transfer to the business partner's bank account, after checking the bank details, for the amount disclosed on the invoice in accordance with the contractual terms.
- All specific documents relating to the business partner's activities must be kept for the entire duration of the business relationship (contract, evidence of services, invoices, payments, etc.) to facilitate subsequent checks and audits.

Q. As part of the contractual terms and conditions' negotiation with an intermediary who has key contacts for obtaining a major contract in Africa, you agree to pay him a part of fees in cash.

Does this constitute an act of corruption?

A. At first glance, yes. Indeed, the payment in cash for a part of the remuneration could be considered as an act of corruption. As any business relationship, it must give rise to a written and signed contract, and flows must be traceable.

In the event that a potential third-party refuses to comply with the due diligence process set up by the Group, the Employee must explain to his or her partner that this process complies with legal obligations in the fight against corruption and its reluctance could lead it not to enter into business relations with the Havas Group

F. Lobbying

Lobbying is any activity designed to influence a government or institution's decisions or guidelines in favor of a specific cause or expected result. It consists of a constructive and transparent contribution for the development of public policies on relevant issues related to the Group's business activity that is designed to enhance the discussion of these issues by public decision-makers.

It is sometimes difficult to distinguish between lobbying, bribery and influence peddling. In theory, it is possible for lobbying activities to become reprehensible and constitute an act of corruption when the lobbyist offers or proposes to offer an undue gift or advantage to a Public official as an incentive to induce him or her to support proposed legislation or activities that would favor the lobbyist or their client's business.

The Group complies with the lobbying provisions of France's Sapin II Law, including the Decree of May 9, 2017 requiring companies to keep a digital register of lobbyists.

Rules:

- Lobbyists should conduct all dealings with Public officials with integrity, intellectual honesty and transparency, whatever the interests or situation they are lobbying for.
- Lobbyists should not seek to obtain an undue political or regulatory advantage.
- Lobbyists should conduct their activities in compliance with this Code and the applicable regulations.

G. Donations, patronage and sponsorship

Many people confuse patronage with sponsorship. The key difference is that patronage does not give rise to any measurable return on investment. Payments are qualified as donations in the case of patronage and investments in the case of sponsorship.

Patronage takes the form of cash or equipment donated by a company to a charity or other non-profit organization without expecting any equivalent benefit in return. Patronage programs are designed to enhance the company's institutional image and the payments are qualified as donations for tax purposes.

Donations made under patronage programs may take various forms:

- Cash donations;
- Loans of employees or pro bono services;
- Donations of goods and/or products;
- Access to available technology or technology used by the company.

Sponsorship is the provision of tangible support for an event, a person, a product or an organization in exchange for advertising the sponsor's name, brand and message during the event.

The Group may make donations and act as a patron to charities and foundations, or conduct sponsorship activities in the countries where it operates.-

In some cases, these donations, patronage and sponsorship activities may be provided to obtain or offer an undue advantage in which case they may be qualified as an act of corruption. Reinforced traceability and documentation will be performed to guarantee the transparency of these practices.

Rules:

- Donations, patronage and sponsorship activities are authorized provided that the applicable laws and regulations are complied with and the Havas Group's procedures are followed.
- Donations, patronage and sponsorship activities should not be provided to obtain or offer an undue advantage or unduly influence a decision.

Q. You are responsible for the Group's patronage and sponsorship activities. During a tender for a government contract, you are asked by a mayor who is a member of the Commission responsible for awarding the contract to sponsor the upcoming local music festival.

Does this constitute an act of corruption?

A. The mayor's request could imply that he is in a position to influence the Commission's decision in return for the sponsorship. You should therefore explain that you can't access to this sponsoring request because of the Group's anti-corruption program.

You should keep in mind that it would be easy to establish a link between the awarding of the contract and the sponsored event, and to qualify the sponsorship as an act of corruption.

H. Political donations

Political donations are any direct or indirect contributions to support a political party, a candidate or an elected official.

Contributions may consist in cash, gifts, services, advertising or any other form of support.

Political donations may be used to conceal an undue advantage that is provided in order to obtain or maintain a business transaction or relationship. In other words, a political donation may be considered or perceived as a direct or indirect act of corruption.

However, the HAVAS Group respects your right to personally invest your own time and money in local political and civic activities.

Rules:

- No Group companies or Employees may make any direct or indirect financial or other contribution in the Group's name to any political organizations, parties or candidates.
- Employees must separate their personal political activities from their activities within the Group, in order to avoid any situation that could lead to a conflict of interests.

I. Acquisitions and participation in joint ventures

When acquiring a company, a business or an equity interest, entering into a merger or setting up a joint venture, you should ensure that the target or partner has not engaged in any current or past practices that breach the applicable anti-corruption laws and is in full compliance with the applicable legislation.

The Group could be held liable under civil or criminal law for any corrupt practices or failure to comply with anti-corruption laws by the target or partner, with significant business, financial and reputational consequences.

Rules:

- The due diligence performed in connection with acquisitions and joint venture projects should include anti-bribery and corruption checks.
- Agreements and contracts signed in connection with acquisitions and joint venture projects should include an anti-corruption clause.

J. Existence and accuracy of ledgers and registers

For the purpose of this Code, the expression "ledgers and registers" means all accounting, financial and business records, including accounting entries, correspondence, financial statements, other accounting, financial, business ledgers and other documents.

As part of the fight against corruption, it is essential that all transactions are transparent, fully documented and allocated to accounts that accurately reflect their nature

Rules:

- The Group's ledgers and registers must not include any unsubstantiated, incorrect, falsified or fake entries.
- The Group's ledgers and registers must give a true and fair view of transactions and be issued in accordance with the applicable accounting standards and principles.
- All of the Group's control and approval procedures must be implemented.
- Documentation reliable to each transaction, included the services provided and payments must be kept.

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3. COMPLIANCE WITH THE ANTI-CORRUPTION CODE AND DISCIPLINARY MEASURES

3. COMPLIANCE WITH THE ANTI-CORRUPTION CODE AND DISCIPLINARY MEASURES

A. Interpretation and compliance

This Code must be read, understood and applied by Havas Group Employee.

The Group's management and of each subsidiary will ensure that:

- Each Employee receives a copy of this Code when they are hired;
- The Code is available on the intranet;
- All Employees comply with the Code at any moment.

If you are wondering whether your actions comply with this Code or if you are unclear about its scope, application and/or interpretation, you should contact:

- Your direct or indirect line manager,
- Or, if this presents difficulties, the Chief Compliance Officer,

In order to obtain answers to your questions, clarifications and guidance.

If you are aware of any failure to comply with the Code's provisions, we strongly foster you to raise the issue with the above persons. You may also exercise your whistleblowing right provided in Articles 8-III and 17 of France's Sapin II Law.

B. Whistleblowing procedure

The Group has established a whistleblowing procedure that extends Employees' means of expression by enabling them to report any conducts or situations that may be qualified as acts of corruption or influence peddling and as such are in breach of this Code.

While Employees have the option of reporting the matter to their line manager, the whistleblowing procedure provides them with additional protection against any negative retaliation.

The use of the procedure is nevertheless optional.

Concretely, any Employee can send a report using the online platform available at the following address:

havas.integrityline.com

You can also report any breach of the Code directly to the Compliance Department through the following e-mail address: compliance@havas.com

The rules governing the whistleblowing procedure and the protection offered to Employees who use it are described in the document entitled "Procedure exposing the receipt and processing of alerts for whistleblowers".

C. Consequences of Code breaches

Failure to comply with the rules set out in this Code may have serious consequences, not only for the Group but also for Employees.

For the Group, any practices that are in breach of the rules set out in this Code may harm its reputation and its business. In addition, it may be obliged to indemnify for any losses caused and may also face criminal proceedings.

For Employees, where the circumstances justify it, failure to comply with the anti-corruption rules set out in the Code may expose them to disciplinary sanctions, including termination of their employment contract, under the conditions set out in the local regulations and internal rules. In addition, criminal and/or civil proceedings may be brought against them.

The background of the image is a vibrant red color, divided into four quadrants by a white cross that meets at the center. The quadrants are formed by diagonal lines extending from the corners towards the center.

HAVAS