ARENA MEDIA HOLDINGS LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/social-responsibility/.

Anti-corruption Code

At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

An Anti-corruption policy has been drawn up to prevent and identify any potential risks situation. These rules apply to all Vivendi employees and all Group business partners (suppliers, subcontractors, intermediaries, etc.).

Vivendi Anti-corruption Code may be found at https://www.vivendi.com/en/.

Vigilance Program

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

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Havas

The company is a member of the global Havas group. The company is bound by and applies global Havas group policies.

Havas is a leading global advertising and communications services group. Havas has special responsibilities due to its influence on society and how the latter evolves over time.

Corporate Social Responsibility and Code of Ethics

Havas Corporate Social Responsibility policy is coordinated at group level. More details may be found at https://www.havasgroup.com.

Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts its business. Havas Code of Ethics is aligned with expectations on the part of its stakeholders. Havas Code of Ethics is detailed at https://www.havasgroup.com.

Havas signed the United Nations Global Compact back in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.
The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:
- promoting a harmonious and healthy working environment that supports collaborators’ growth and development;
- reinforcing socially responsible procurement policies in our supply chain;
- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

Havas Group UK
In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders
The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

Havas Media Division and HKX
The company is primarily located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee engagement
The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development
Our People team provide high quality development opportunities for all employees:
- HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually;
- bespoke individual development plans and manager training;

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading award winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
- the programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion
We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diversity community of the UK.

We deliver against this commitment in the following ways:
- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter
which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

For the second year running, we won Campaign’s Best Place to Work award in recognition of our focus on creating a great place to work for our employees.

The community
We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:
- partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- developed a homework club for local students who have nowhere to work after school;
- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill;
- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office; and
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
ARENA MEDIA LIMITED

YEAR ENDED 31 DECEMBER 2021

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Suppliers, customers and clients
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Some examples include:
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CONRAN DESIGN GROUP LIMITED

YEAR ENDED 31 DECEMBER 2021

S172(1) Compliance Statement

Vivendi

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Anti-corruption Code

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Vigilance Program

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Shareholders
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Conran and HKX
The company is primarily located within Havas’s London Village at Havas King's Cross (“HKX”) in Pancras Square, London.

Employee engagement
The board understands that Conran's UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market.
We have 3 key strategic pillars that deliver against this commitment:

Learning and Development
Our People team provide high quality development opportunities for all employees:
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- Regular keynote talks and inspiration sessions are delivered both in our onsite auditorium and virtually;
- Bespoke team and individual development plans and manager training;

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading, award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
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Diversity and Inclusion
The Havas group has a concerted strategic focus on diversity and inclusion and strives to create a workplace that is free of bias and fully representative of the diverse community of the UK.
We deliver against this commitment in the following ways:

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- All employee notebooks, pens and pencils are made from old pallets
- Achieve Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients

Conran Design Group Limited are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:

- For local corporate travel, we use a taxi company that only uses low and zero emission cars;
- Sourced over 80% of suppliers within 50 miles of our office;
- We are registered as a SEDEX supplier (Supplier Ethical Data Exchange) to share the details of our labour standards, health and safety, the environment and our business ethics with our clients.
CREATIVE LYNX GROUP LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

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Anti-corruption Code

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Employee engagement

The company does not have any employees.

Suppliers, customers and clients

The company does not have any suppliers, customers or clients.
CREATIVE LYNX LIMITED

YEAR ENDED 31 DECEMBER 2021

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Creative Lynx Limited

The company is part of the Havas Media Group trading division and is primarily located within Havas’s Manchester Village at Princess Street.

Employee engagement

At Havas Lynx Group, the Directors understand that employees are at the heart of everything we do as a business and recognise the importance of an engaged and dynamic workforce. With this in mind, the Directors continue to take responsibility for gathering the views across the Group through multiple employee surveys throughout the year, as well as employee focus groups to allow individuals to voice opinions. Employees are also given the chance to engage with senior members of the Group through ‘AGM’ meetings and inductions for new starters. The trends are regularly reviewed, and the feedback is worked into our company strategy to ensure the agency culture continues to evolve in line with employee needs. The results are also presented at a company-wide level for transparency, as well as team results being presented to department leaders, so action plans can be created.

The type of employee engagement activity that is contained within our Talent Strategy includes:

- A full L&D offering – entitled LYNXLights. This comprises CPD accredited courses targeted at all levels of Seniority across the business; from Apprentice and Graduate / entry level roles, right through to Managers and Senior Leadership. It also comprises our flagship L&D programme - LXAcademy, which runs through May – October each year and is tailored to each Discipline within the business. This is in addition to bespoke programmes such as Inductions and onboarding for new starters and mentoring with internal / external mentors.

- To support capabilities development within the business, we also hold regular and structured annual reviews with all team members. Each person has a personalised development plan, annual review meetings where 360 feedback is taken, and monthly 121s are also encouraged with line managers. As people develop, promotions are awarded, and due to our unique business structure, we also readily offer opportunities to work and develop in other divisions within the group, meaning strong development pathways exist.

- To further drive retention and engagement, which is key to our business, we have the LYNXLife benefits package which offers all employees rewards, aimed at supporting them through personal and professional milestones. These include, but are not limited to, increasing holiday allowance in line with length of service, pension scheme, healthcare cash back scheme, enhanced maternity and paternity allowances.

- Wellbeing – whilst we are in tune with the wider network’s Equalise programme and access complimentary
materials, we also run our own local initiative. This comprises of a calendar of days to be celebrated, for example Mental Health Awareness Week, plus guest talks and additional resources. We run regular mental health awareness training for managers and leaders in the business. In addition, we have a number of qualified mental health first aiders in the business. We offer support for self-coaching, resilience, mental fitness, setting boundaries, focus and confidence via group coaching.

- Equality, Diversity and Inclusion (ED&I) is also key to employee engagement at Havas Lynx Group. We regularly analyse our employee demographics and values, to ensure that we create an increasingly diverse and inclusive environment. Our ED&I strategy has been unveiled to the company and focuses on three key areas – evolving our internal and industry systems, encouraging education and ownership, plus supporting and elevating careers. This translates into tactics such as broadening our pipeline of talent, evolving management practices, and bolstering our reporting. The Talent Acquisition team also underwent bias training.

- We offer a hybrid way of working, referred to as our “Thoughtful Working” policy, which encompasses both remote and office working. This allows individuals the opportunity to plan where they are working, being considerate to their colleagues, client needs and project requirements. To support people in adapting to hybrid working, we have formulated guidance, training, and resources. Evolving our working practices to suit the new future of a hybrid office / virtual model will continue to be key in our approach to employee engagement.

The environment

We recognise our responsibility to proactively protect our environment and we want to ensure that our actions are having a positive impact on our planet.

Some examples of achievements the group have achieved to date include:

- **Recycling** – we have implemented a robust recycling scheme across the Havas Lynx Group offices, encouraging everyone in the business to reduce, reuse, and recycle, both inside and outside of work;

- **At home communications** – whilst working remotely, we have shared communication to encourage employees to save energy and consider their impact on the environment – especially during the Christmas holiday period;

- **Recyclable stationery** – we have consciously switched to using recyclable envelopes when sending employees items to their home;

- **Upcycling technology** – employee technology no longer suitable for the business – including laptops, iPhones, iMacs – is upcycled and donated to local charities or schools who are in need;

- **Reducing single-use plastics** – we’ve reduced our use of single-use plastics by switching to glass (reusable) milk bottles and distributing reusable water bottles, cups, bags for life, and metal straws to our employees;

- **Beach cleans & litter picking** – we’ve ran a number of events including beach cleans – to reduce the amount of waste accumulating along our coastlines – and litter picks alongside Biffa in support of the Manchester 10K to reduce the waste created by runners during such large scale events;

- **Offsetting carbon emissions** – we’ve offset our carbon emissions by planting trees – locally and globally. Partnered with City of Trees to support the growth of more trees in our urban spaces. We also plant a tree for every new starter who joins Havas Lynx Group. To date we are responsible for the planting of more than 5,000 trees;

- **City of Trees advertising** – secured a google grant of $10,000 per month of advertising spend for the charity City of Trees to help them raise awareness of their cause;

- **Cycle to work scheme** – we encourage employees to cycle to work where possible through the cycle-to-work scheme, a scheme that saves employees money when they purchase cycle equipment;

- **Printing** – encourage all employees to reduce their print outputs through setting all printers to automatically print double-sided, and implemented a system whereby employees have to approve their printing requirements through their employee pass, thus reducing waste; and

- **Office lighting** – around 50% of lighting in our Manchester offices is fitted with LED bulbs – which are up to 80% more energy efficient than conventional bulbs. When light fittings stop working, we replace them with an LED bulb.

Suppliers, customers and clients

We engage with a variety of stakeholders including suppliers, customers and clients to inform and enable balanced
decisions that incorporate multiple viewpoints, whilst maintaining the company strategy. In making decisions the board considers outcomes from engagements with stakeholders as well as maintaining the company’s integrity, brand and reputation.

Some examples include:

- Receiving regular feedback from clients to ascertain our performance and monitor end user satisfaction levels.
- A commitment to reinforcing socially responsible procurement policies in our supply chain and with our clients.
EWDB LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/.

Anti-corruption Code

At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

An Anti-corruption policy has been drawn up to prevent and identify any potential risks situation. These rules apply to all Vivendi employees and all Group business partners (suppliers, subcontractors, intermediaries, etc.).

Vivendi Anti-corruption Code may be found at https://www.vivendi.com/en/our-group/governance/compliance-program/.

Vigilance Program

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

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Havas

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Havas is a leading global advertising and communications services group. Havas has special responsibilities due to its influence on society and how the latter evolves over time.

Corporate Social Responsibility and Code of Ethics

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Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts its business. Havas Code of Ethics is aligned with expectations on the part of its stakeholders. Havas Code of Ethics is detailed at www.havasgroup.com/havas-content/uploads/2020/01/havas_codeofethics_2017.pdf.

Havas signed the United Nations Global Compact back in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.
The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:

- promoting a harmonious and healthy working environment that supports collaborators’ growth and development;
- reinforcing socially responsible procurement policies in our supply chain;
- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

EWDB

The directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders

The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:

- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

EWDB and HKX

The company is just one of the many Havas UK group entities that are located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee engagement

The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development

Our People team provide high quality development opportunities for all employees:

- HKX Campus, a comprehensive prospectus of learning and development offerings servicing employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually; and
- bespoke team and individual development plans and manager training.

Health and Wellbeing

Our business also recognises the crucial importance of promoting positive health and wellbeing:

- Havas Equalise is our industry-leading award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020; and
- the programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.
Diversity and Inclusion

We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diverse community of the UK.

We delivered against this commitment in the following ways:

- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

The community

We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

The environment

Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:

- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill; and
- our London office notebooks, pens and pencils are made from old pallets; and
- we endeavour to use environmentally positive supplies wherever possible.

Suppliers, customers and clients

We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:

- for local corporate travel, we use a taxi company that only uses low and zero emission cars; and
- wherever possible we use local suppliers to reduce carbon emissions etc.
Duty to promote the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/social-responsibility/.

Anti-corruption Code

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- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

Havas Group UK
In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of both the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders
The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

Havas Media Division and HKX
The company is primarily located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee Engagement
The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development
Our People team provide high quality development opportunities for all employees:
- HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually;
- bespoke individual development plans and manager training;

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading award winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
- the programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion
We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diversity community of the UK.

We deliver against this commitment in the following ways:
- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

For the second year running, we won Campaign’s Best Place to Work award in recognition of our focus on creating a great place to work for our employees.

The community
We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:
- partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- developed a homework club for local students who have nowhere to work after school;
- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill;
- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office; and
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
Vivendi

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Vivendi is an integrated content, media and communications group.

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Anti-corruption Code
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Havas Group UK
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Shareholders
The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
• regular and timely management accounts;
• detailed and accurate financial budgets and forecasts;
• collaboration as part of the Vivendi cash management policy; and
• consultation and approval of any significant investment and acquisition decisions.

Havas Creative Division and HKX
The company is part of the Havas Creative Group trading division and is primarily located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee engagement
The board understands that as a professional services firm our people are at the heart of everything we do as a business, and the importance of an engaged, dynamic and high performing workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development
Our People team provide high quality development opportunities for all employees:
• HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
• Regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually; and
• Bespoke team and individual development plans and manager training.

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
• Havas Equalise is our industry-leading, award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020; and
• The programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion
We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diverse community of the UK.
We deliver against this commitment in the following ways:
• Our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
• We encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
• We deliver Havas Doorway events with partner schools and community groups to drive awareness about our
industry with young people and make entry more accessible;
• We deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
• In 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

The community
We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:

• Partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
• Developed a homework club for local students who have nowhere to work after school;
• Set up clothes recycling stations in our offices;
• Partnered with Redemption Roasters to give young offenders the chance to skill up; and
• Donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
The HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
• our King’s Cross premises has eliminated all single use plastics;
• reduced carbon emissions by 6% per employee;
• all employee notebooks, pens and pencils are made from old pallets;
• achieved zero waste to landfill; and
• achieve Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
• for local corporate travel, we use a taxi company that only uses low and zero emission cars;
• sourced over 80% of suppliers within 50 miles of our office; and
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HAVAS CANADA HOLDINGS LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

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Anti-corruption Code

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Vigilance Program

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Shareholders

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• regular and timely management accounts;
• detailed and accurate financial budgets and forecasts;
• collaboration as part of the Vivendi cash management policy; and
• consultation and approval of any significant investment and acquisition decisions.

Customers, suppliers and employees

The company does not have any customers, employees or business premises. Its only supplier is a bank. The relationship with the bank is managed by Havas Shared Services Limited.
HAVAS E GROUP LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

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Havas is committed to:
- promoting a harmonious and healthy working environment that supports collaborators’ growth and development;
- reinforcing socially responsible procurement policies in our supply chain;
- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

Havas Group UK
In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders
The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

Havas Media Division and HKX
The company is primarily located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee engagement
The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development
Our People team provide high quality development opportunities for all employees:
- HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually;
- bespoke individual development plans and manager training;

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading award winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
- the programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion
We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diversity community of the UK.

We deliver against this commitment in the following ways:
- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

For the second year running, we won Campaign’s Best Place to Work award in recognition of our focus on creating a great place to work for our employees.

The community
We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:
- partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- developed a homework club for local students who have nowhere to work after school;
- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill;
- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office; and
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
HAVAS ENTERTAINMENT LIMITED

ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/social-responsibility/.

Anti-corruption Code

At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

An Anti-corruption policy has been drawn up to prevent and identify any potential risks situation. These rules apply to all Vivendi employees and all Group business partners (suppliers, subcontractors, intermediaries, etc.).

Vivendi Anti-corruption Code may be found at https://www.vivendi.com/en/.

Vigilance Program

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

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Havas

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Havas is a leading global advertising and communications services group. Havas has special responsibilities due to its influence on society and how the latter evolves over time.

Corporate Social Responsibility and Code of Ethics

Havas Corporate Social Responsibility policy is coordinated at group level. More details may be found at https://www.havasgroup.com.

Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts its business. Havas Code of Ethics is aligned with expectations on the part of its stakeholders. Havas Code of Ethics is detailed at https://www.havasgroup.com.

Havas signed the Global Compact back in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.
The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:
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Havas Group UK
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Shareholders
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Health and Wellbeing
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- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

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- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
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- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office; and
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
HAVAS HELIA LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

The directors' main objectives are to maintain and increase the company's turnover and profitability by growing the company's client base, operational excellence and cost control, and through greater collaboration between the company and its partner agencies across the Havas group.

Promoting the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

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Anti-corruption Code

At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

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Vigilance Program

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

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Havas

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Corporate Social Responsibility and Code of Ethics

Havas Corporate Social Responsibility policy is coordinated at group level. More details may be found at https://www.havasgroup.com.

Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts

Havas signed the Global Compact in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.

The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:

- promoting a harmonious and healthy working environment that supports collaborators' growth and development;
- reinforcing socially responsible procurement policies in our supply chain;
- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

Havas Group UK

In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of both the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders

The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:

- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

Employee engagement

The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development

Our People team provide high quality development opportunities for all employees:

- HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually;
- bespoke team and individual development plans and manager training;
Health and Wellbeing

Our business also recognises the crucial importance of promoting positive health and wellbeing:

- Havas Equalise is our industry-leading award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
- The programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion

We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diverse community of the UK.

We deliver against this commitment in the following ways:
- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- we delivered four Havas Doorway events with some of our partner schools and community groups. We had over 80 young people attend across the year, driving awareness and accessibility of our industry;
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

The community

We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:

- partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- developed a homework club for local students who have nowhere to work after school;
- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment

Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:

- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill;
- all employee notebooks, pens and pencils are made from old pallets; and
- achieve Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

**Suppliers, customers and clients**

We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:

- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office;
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
HAVAS HOLDINGS LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

Anti-corruption Code
At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

An Anti-corruption policy has been drawn up to prevent and identify any potential risks situation. These rules apply to all Vivendi employees and all Group business partners (suppliers, subcontractors, intermediaries, etc.).

Vivendi Anti-corruption Code may be found at https://www.vivendi.com/en/.

Vigilance Program
Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

More details may be found at https://www.vivendi.com/en/.

Havas

The company is a member of the global Havas group. The company is bound by and applies global Havas group policies.

Havas is a leading global advertising and communications services group. Havas has special responsibilities due to its influence on society and how the latter evolves over time.

Corporate Social Responsibility and Code of Ethics
Havas Corporate Social Responsibility policy is coordinated at group level. More details may be found at https://www.havasgroup.com.

Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts its business. Havas Code of Ethics is aligned with expectations on the part of its stakeholders. Havas Code of Ethics is detailed at https://www.havasgroup.com.

Havas signed the United Nations Global Compact back in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.
The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:
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Havas Group UK
In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of both the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders
The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

Customers, suppliers and employees
The company does not have any customers, employees or business premises. Its only supplier is a bank. The relationship with the bank is managed by Havas Shared Services Limited.
HAVAS MEDIA LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

Havas is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/social-responsibility/.

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Havas Media Division and HKX
The company is primarily located within Havas’s London Village at Havas King’s Cross ("HKX") in Pancras Square, London.

Employee engagement
The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

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Health and Wellbeing
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Diversity and Inclusion
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- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
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- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
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For the second year running, we won Campaign’s Best Place to Work award in recognition of our focus on creating a great place to work for our employees.

The community
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The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill;
- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office; and
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
Duty to promote the success of the company

**Vivendi**

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**Vigilance Program**

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

More details may be found at https://www.vivendi.com/en/.

**Havas**

The company is a member of the global Havas group. The company is bound by and applies global Havas group policies.

Havas is a leading global advertising and communications services group. Havas has special responsibilities due to its influence on society and how the latter evolves over time.

**Corporate Social Responsibility and Code of Ethics**

Havas Corporate Social Responsibility policy is coordinated at group level. More details may be found at https://www.havasgroup.com.

Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts its business. Havas Code of Ethics is aligned with expectations on the part of its stakeholders. Havas Code of Ethics is detailed at https://www.havasgroup.com.

Havas signed the Global Compact back in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.
The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:
- promoting a harmonious and healthy working environment that supports collaborators’ growth and development;
- reinforcing socially responsible procurement policies in our supply chain;
- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

Havas Group UK
In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of both the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders
The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

Havas Media Division and HKX
The company is primarily located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee engagement
The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development
Our People team provide high quality development opportunities for all employees:
- HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually;
- bespoke individual development plans and manager training;

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading award winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
- the programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion
We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diversity community of the UK.

We deliver against this commitment in the following ways:
- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter
which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

For the second year running, we won Campaign’s Best Place to Work award in recognition of our focus on creating a great place to work for our employees.

The community
We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:
- partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- developed a homework club for local students who have nowhere to work after school;
- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill;
- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office; and
- Havas are also certified with IAB Gold Standard. This certification consolidates all industry best practice initiatives across Brand Safety, Fraud and Coalition for Better Ads. As part of this certification our pledge is that we operate within the strict boundaries of the Gold Standard to ensure we offer our clients the very highest standards in digital buying.
HAVAS SHARED SERVICES LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

HAVAS is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/.

Anti-corruption Code

At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

An Anti-corruption policy has been drawn up to prevent and identify any potential risks situation. These rules apply to all Vivendi employees and all Group business partners (suppliers, subcontractors, intermediaries, etc.).

Vivendi Anti-corruption Code may be found at https://www.vivendi.com/en/our-group/governance/compliance-program/.

Vigilance Program

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

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Havas is committed to:

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- reinforcing socially responsible procurement policies in our supply chain;
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- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

**Havas Shared Services**

The directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

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**Shareholders**

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- regular and timely management accounts;
- detailed and accurate financial budgets and forecasts;
- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

**Havas Shared Services and HKX**

The company is just one of the many trading entities that are located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London and we are also located in Havas House, Maidstone.

**Employee engagement**

The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

**Learning and Development**

Our People team provide high quality development opportunities for all employees:

- HKX Campus, a comprehensive prospectus of learning and development offerings servicing employees across the UK;
- regular keynote talks and inspiration sessions delivered in our onsite auditorium and virtually; and
- bespoke team and individual development plans and manager training.
Health and Wellbeing

Our business also recognises the crucial importance of promoting positive health and wellbeing:

- Havas Equalise is our industry-leading award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020; and
- the programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.

Diversity and Inclusion

We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diverse community of the UK.

We delivered against this commitment in the following ways:

- our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
- we encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- we deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- we deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- in 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

The community

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The environment

Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:

- our King’s Cross premises has eliminated all single use plastics;
- reduced carbon emissions by 6% per employee;
- achieved zero waste to landfill; and
- our London office notebooks, pens and pencils are made from old pallets; and
- we endeavour to use environmentally positive supplies wherever possible.

Suppliers, customers and clients

We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:

- for local corporate travel, we use a taxi company that only uses low and zero emission cars; and
- wherever possible we use local suppliers to reduce carbon emissions etc.
HAVAS UK LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi
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Vivendi is an integrated content, media and communications group.

Anti-corruption Code
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Shareholders
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- regular and timely management accounts;
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- collaboration as part of the Vivendi cash management policy; and
- consultation and approval of any significant investment and acquisition decisions.

HKX
The company is primarily located within Havas’s London Village at Havas King’s Cross (“HKX”) in Pancras Square, London.

Employee engagement
The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment.

Learning and Development
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Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
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Some of our achievements to date within our community:
- partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- developed a homework club for local students who have nowhere to work after school;
- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

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- all employee notebooks, pens and pencils are made from old pallets; and
- achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars;
- sourced over 80% of suppliers within 50 miles of our office.
HAVAS WORLDWIDE LONDON LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

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 Anti-corruption Code

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Learning and Development
In partnership with the agency leadership team, our People and Talent team provide high quality development opportunities for all employees:
- HKX Campus, is a comprehensive programme of learning and development offerings available to 1,700 employees across the UK;
- Regular keynote talks and inspiration sessions are delivered both in our onsite auditorium and virtually;
- Bespoke team and individual development plans are drawn up in consultation with our employees and manager training provided;

Health and Wellbeing
Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020;
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- All employee notebooks, pens and pencils are made from old pallets;
- Achieve Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Benefit Corporation Status
Certified B Corp companies are legally required to consider the impact of decisions on their workers, customers, suppliers, community and the environment. In order to be a Certified B Corporations a company needs to achieve a minimum verified score on the B Impact Assessment—a rigorous assessment of a company’s impact on its workers, customers, community, and environment—and make their B Impact Report transparent on bcorporation.net. B Corp Certification is administered by the non-profit B Lab.

Havas Worldwide London attained B Corp status in August 2018.

At Havas our mission is to make a meaningful difference to brands, businesses and people. In 2009 as a Global Group, Havas took the pledge to operate as a responsible business and established six Corporate Social Responsibility commitments with fixed objectives. The logical next step is for Havas Group to become a certified Benefit Corporation (B Corp) globally. Certified B Corporations are businesses that meet the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.
HAVAS PEOPLE LIMITED

YEAR ENDED 31 DECEMBER 2021

Duty to promote the success of the company

Vivendi

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**Employee engagement**

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In partnership with the agency leadership team, our People and Talent team provide high quality development opportunities for all employees:

- HKX Campus, a comprehensive prospectus of learning and development offerings servicing 1,700 employees across the UK;
- Regular keynote talks and inspiration sessions are delivered both in our onsite auditorium and virtually;
- Bespoke team and individual development plans are drawn up in consultation with our employees and manager training;

**Health and Wellbeing**

Our business also recognises the crucial importance of promoting positive health and wellbeing:
- Havas Equalise is our industry-leading, award-winning health and wellbeing programme, awarded the best mental health strategy from the Not a Red Card Awards 2020; and
- The programme continues to deliver over 600 hours of wellbeing activity for our employees, comprised of: mental wellness sessions, 1:1 personal development coaching surgeries, physical wellness sessions.
Diversity and Inclusion

We have a concerted strategic focus on diversity and inclusion and strive to create a workplace that is free of bias and fully representative of the diversity community of the UK. We recruited a Diversity and Inclusion Manager specifically to ensure that our strategic focus is delivered through a range of initiatives.

We deliver against this commitment in the following ways:
- Our Executive Diversity, Equity & Inclusion Committee holds our Diversity & Inclusion Charter which sets out our commitments over the next five years;
- We encourage all our employees to share information about their ethnicity with us to ensure we have a clear picture and we communicate regularly and transparently with them;
- We deliver Havas Doorway events with partner schools and community groups to drive awareness about our industry with young people and make entry more accessible;
- We deliver our bespoke All In Workshop covering bias, privilege, equity, intersectionality and anti-racism practice; and
- In 2021 specifically, we leveraged the Government’s Kickstart Scheme to turbocharge our HKX Platform internship programme, committing to bringing in 100 interns for 6 month placements, full time and paying the London Living Wage.

The community
We recognise that we have a responsibility to enact positive social change and can be both a mirror and an engine in society.

Some of our achievements to date within our community:
- Partnered with small UK-based charity to deliver meals and essential items to homeless people in London and Manchester;
- Developed a homework club for local students who have nowhere to work after school;
- Set up clothes recycling stations in our offices;
- Partnered with Redemption Roasters to give young offenders the chance to skill up; and
- Donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some of our achievements to date within our community:
- Our King’s Cross premises has eliminated all single use plastics;
- Reduced carbon emissions by 6% per employee;
- Achieved zero waste to landfill;
- Achieved Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.
- Donated £50,000 worth of time to a charity combating loneliness and isolation.
Duty to promote the success of the company

Vivendi

The company is a member of the Vivendi group. The company is bound by and applies Vivendi group policies.

Vivendi is an integrated content, media and communications group.

More details of Vivendi’s Corporate Social Responsibility ethos, policies, activities and results may be found at https://www.vivendi.com/en/.

Anti-corruption Code

At Vivendi, all employees are required to comply with the laws and regulations in the countries in which they operate. The Group’s commitment in this regard is reflected in the implementation of a Compliance Program that covers personal data protection and anti-corruption measures, as well as obligations for monitoring the Group’s business activities.

An Anti-corruption policy has been drawn up to prevent and identify any potential risks situation. These rules apply to all Vivendi employees and all Group business partners (suppliers, subcontractors, intermediaries, etc.).

Vivendi Anti-corruption Code may be found at https://www.vivendi.com/en/.

Vigilance Program

Vivendi has implemented a Compliance Program which sets out general ethics rules which are applicable to each and every group employee.

These guidelines cover the rights of employees, the quality of information and its protection, the prevention of conflicts of interest, commercial ethics and the respect of competition rules, the use of group property and resources, financial ethics and respect for the environment. The objective of the Compliance Program is to make employees aware of their professional responsibilities, to provide them with a reference tool that helps them determine appropriate conduct.

More details may be found at https://www.vivendi.com/en/.

Havas

The company is a member of the global Havas group. The company is bound by and applies global Havas group policies.

Havas is a leading global advertising and communications services group. Havas has special responsibilities due to its influence on society and how the latter evolves over time.

Corporate Social Responsibility and Code of Ethics

Havas Corporate Social Responsibility policy is coordinated at group level. More details may be found at https://www.havasgroup.com.

Ethics is the foundation of this Corporate Social Responsibility approach and the basis on which the group conducts its business. Havas Code of Ethics is aligned with expectations on the part of its stakeholders. Havas Code of Ethics is detailed at https://www.havasgroup.com.
Havas signed the Global Compact in 2003 and continues to assert its commitment to the 10 main principles defined by the United Nations with regard to human rights, labour law, the environment and the fight against corruption.

Havas has made corporate social responsibility an integral part of everything it does. Havas encourages its agencies to harness the power of creative ideas to bring about positive change and minimize any negative impact on society.

The Group has established six commitments to progress which guide all aspects of the business regardless of the nature of the work.

Havas is committed to:
- promoting a harmonious and healthy working environment that supports collaborators’ growth and development;
- reinforcing socially responsible procurement policies in our supply chain;
- promoting transparency and ethics in our business;
- taking the lead in the creation and diffusion of responsible communications throughout our agencies and in collaborations with clients and partners;
- reducing the environmental footprint of our operations; and
- maintaining our commitment to collaborative efforts in reducing climate change.

Havas Group UK

In the UK, the directors of the company have taken all necessary steps to ensure that the company has implemented and complied with all Havas and Vivendi group policies and procedures.

Furthermore, the board constantly assesses the implications of decisions made, in terms of the both the potential long-term consequences for the company, together with the impact on our stakeholders, including shareholders, employees, clients, suppliers and customers, the wider community and the environment.

Shareholders

The board communicates directly with Vivendi regarding strategy and performance of the company through a number of different channels:
- Regular and timely management accounts;
- Detailed and accurate financial budgets and forecasts;
- Collaboration as part of the Vivendi cash management policy; and
- Consultation and approval of any significant investment and acquisition decisions.

Employee engagement

The board understands that Havas UK’s staff are at the heart of everything we do as a business, and the importance of an engaged and dynamic workforce to ensure we can respond to the challenging media market. We have 3 key strategic pillars that deliver against this commitment:

Learning and Development

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- set up clothes recycling stations in our offices;
- partnered with Redemption Roasters to give young offenders the chance to skill up; and
- donated £50,000 worth of time to a charity combating loneliness and isolation.

The environment
Our unique employee-led HKX Roots committee is focused on progressing green policies in the UK to make our business as environmentally friendly as possible.

Some examples of achievements the group has garnered to date:
- Our King’s Cross premises has eliminated all single use plastics;
- Reduced carbon emissions by 6% per employee;
- Achieved zero waste to landfill;
- All employee notebooks, pens and pencils are made from old pallets
- Achieve Gold CSR rating with EcoVardis, a trusted provider of sustainability ratings.

Suppliers, customers and clients
We are committed to reinforcing socially responsible procurement policies in our supply chain and with our clients.

Some examples include:
- for local corporate travel, we use a taxi company that only uses low and zero emission cars; and
- sourced over 80% of suppliers within 50 miles of our office.