
STAKEHOLDER ENGAGEMENT POLICY

HAVAS N.V.

Dated as of 16 December 2024

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1 Introduction

- 1.1 This stakeholder engagement policy (the **Policy**) of Havas N.V. (the **Company**) was adopted by the board of directors of the Company (the **Board**) on 11 December 2024 and is effective as from and including 16 December 2024 and shall remain in full force and effect until amended or terminated (in whole or in part). This Policy has been prepared in accordance with best practice provision 1.1.5 of the Dutch corporate governance code.
- 1.2 The Company considers continuous dialogue and engagement with its stakeholders essential to understand their needs, interests and expectations whilst pursuing sustainable long-term value creation.
- 1.3 The Company and its stakeholders should be prepared to engage in a dialogue. The Company is expected to facilitate the dialogue unless, in the opinion of the Board, this is not in the interests of the Company and its affiliated enterprise.
- 1.4 For the purpose of this Policy, the Company has identified the following categories of stakeholders:
- (i) governments and regulatory authorities;
 - (ii) employees;
 - (iii) clients;
 - (iv) suppliers, service providers and sub-contractors;
 - (v) competitors;
 - (vi) shareholders and financial markets; and
 - (vii) a society of citizens and consumers.

2 Governments and regulatory authorities

- 2.1 The Company continues to engage and partner with governments and national and international organizations as regards the Company's investments and business strategy (in particular the sustainability aspects thereof). The Company conducts these relations in compliance with the laws and regulations in force where the Company operates, as well as in accordance with the principles established in the Company's Code of Ethics.
- 2.2 In each jurisdiction where the Company or its group companies (together the **Group**) operate, local governments and national and/or international regulatory authorities provide oversight related to advertising, communications, advertising space buying, media consulting services and lobbying. The Group is further subject to oversight by governments and national and/or international regulatory authorities related to data protection, artificial intelligence, anti-bribery, anti-corruption and transparency, and economic sanctions.

3 Employees

3.1 Human capital is a crucial factor in the Group's success. As at June 30, 2024, the Group employed 23,227 people globally (around 16.1% of whom were employed in France), and keeping them engaged is critical to its business. The Company encourages social dialogue and the exercise of trade union rights. A whistleblowing system designed to detect risks is available to employees.

4 Clients

4.1 The Group continues to invest in the innovation and diversity of its service offerings. The Group's services are closely aligned with its clients' trends and needs, and the Company continues to explore new services, while maintaining the top-tier standards that its clients expect.

4.2 Relations with clients shall be based on integrity, loyalty and mutual trust. The Company must advise its clients of the existence of any legal or reputational risk arising in connection with communications it arranges on their behalf.

5 Suppliers, service providers and sub-contractors

5.1 The Company understands that its relationships with suppliers, sub-contractors and service providers (**Business Partners**) are essential for its sustainable long-term value creation. The Company bases the selection of its Business Partners on criteria including environmental, social, and human rights aspects. The Company requires that its suppliers share its ethical principles, particularly in relation to the environment, social issues, human rights, the fight against forced labour and child labour.

5.2 Relationships with Business Partners cannot be established unless business partners are informed of the Company's anti-corruption commitments and receive documents on its Compliance Policy (e.g., Anti-Corruption Code and Responsible Purchasing Charter). Each Business Partner also ensures that their draft contracts include an anticorruption clause setting out each party's commitments with regard to anti-corruption issues. Along with the anti-corruption clause, a vigilance clause consolidates the contractual provisions on compliance.

6 Competitors

6.1 The Group's agencies and media services compete with other agencies and other providers of creative, advertising, marketing or media services to maintain existing client relationships and win new clients and accounts. The Company values open competition with such competitors, and considers it is important to help the sector progress and to work in partnership with such competitors, particularly within professional organisations

7 Shareholders and financial markets

- 7.1 The Company aims to develop a fair, transparent and constructive relationship with its shareholders and investors, with a direct effect on, *inter alia*, continuous sustainability performance improvements. The Company regularly engages with its investors to better understand what they consider to be main sustainability drivers for the Group.
- 7.2 For the policy on bilateral contact between the Company and its shareholders, reference is made to the Company's policy on bilateral contacts with shareholders.

8 A society of citizens and consumers

- 8.1 The Company is aware of its influence and of its responsibility to civil society which is the direct or indirect target of its advertising communications, and recognizes its duty to communicate in an honest, ethical and responsible manner. As such, the Company shall pay attention to all stakeholders' concerns prior to communicating, in particular to groups at whom the communications are aimed. Responsible communications are further designed to minimize their impact on the environment and social and societal issues.
- 8.2 The Company's goal is to lead the way in creating and delivering responsible communication messages through the Group's agencies in collaboration with its clients and partners. Examples of the Group's work towards responsible communication are its contribution to the development of the "Lifestyle representations and the ecological transition" guide by EpE (Companies for the Environment), and the various meaningful campaigns conducted in several regions where the Group is active.

9 General provisions

- 9.1 The Board is authorised to adopt and amend this Policy. The Board retains its right to deviate from this Policy.

10 Website

- 10.1 This Policy, and any amendments thereto, shall be published on the Company's website.

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