

Code of Conduct for Out-of-Home display

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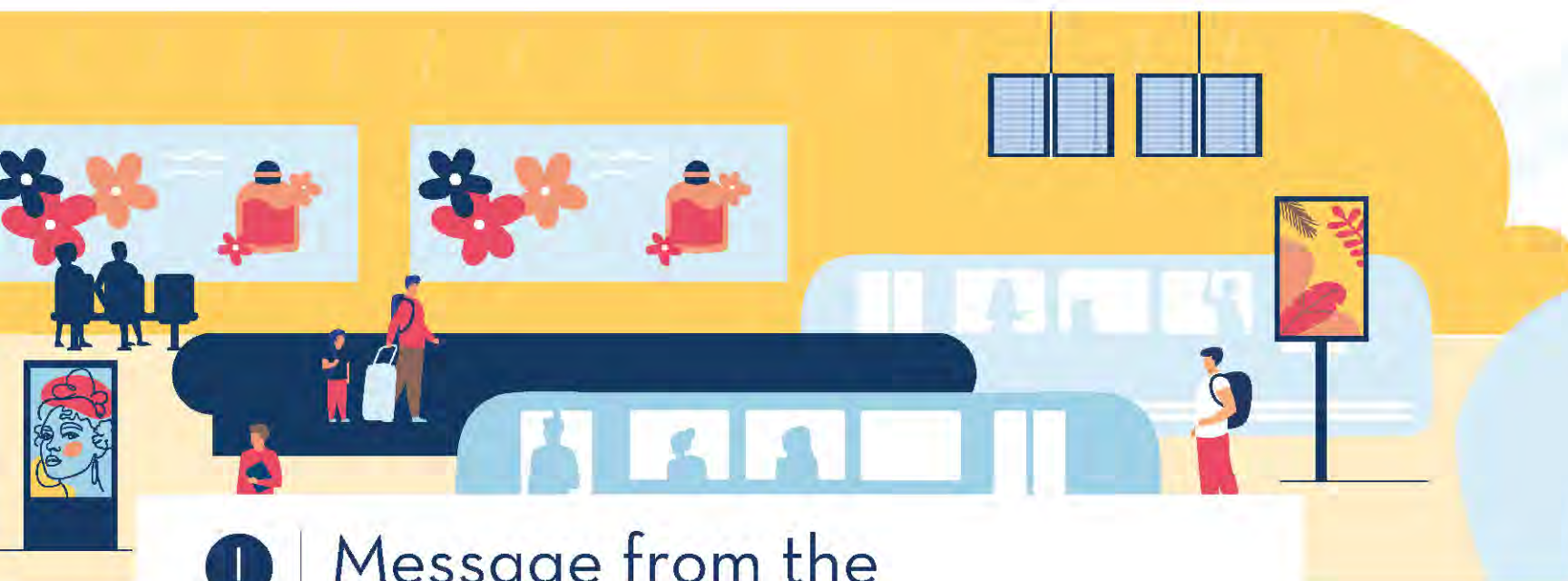
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I Message from the Executive Board

JCDecaux occupies a unique role in cities across the world, responsible for the installation and marketing of nearly one million of advertising displays in public spaces each day. Out-of-Home advertising is part of the community, giving JCDecaux a special responsibility for the quality of our advertising sites, from their design, operation and maintenance to the advertising content – to ensure we meet the expectations of our clients, partners and the public.

Quality and service has been at the heart of our business, ever since Jean-Claude Decaux founded our company in 1964. Building upon his vision, our business has the strongest commitment to ethical and responsible advertising – part of our ambition to be the leader in Out-of-Home advertising and a trailblazer in responsible communications. We comply with all the local laws and regulations everywhere we operate, but we also go further, introducing our own Code of Conduct for Out-Of-Home Display («Code of Conduct») in line with the values of our founder.

Our Code of Conduct is global in scale and sets out clear principles, based upon our Company values. It includes guidelines for how the Code should be communicated and monitored in each region as well as the expertise and responsibility required in each location.



II Introduction

As the number one company in Out-of-Home advertising worldwide, JCDecaux provides communities and transport partners with valuable amenities and services paid for by advertising. We take great care to design, install and maintain our Street Furniture so that it is useful and aesthetically pleasing, enhancing life in cities for people. Part of the community, our advertising sites enable our partners and stakeholders to communicate with the public when they are out and about, creating economic and social value everywhere we operate.

Jean-Claude Decaux's pioneering concept of services funded by advertising has been recognised for its excellence across the world. Today, the sustainable business model he created continues to deliver improvements in urban living, at no cost to local taxpayers in more than 80 countries, across every continent. Our media reaches people in thousands of major cities (with over 10,000 inhabitants), in more than 150 airports and across hundreds of transport networks for metros, buses, trains and trams. The Group's values of quality, innovation and passion continue to define how we work across our three environments: Street Furniture, Transport and Billboard Advertising.

Our advertising networks are seen on a daily basis by hundreds of millions of people across the globe, creating a public platform on a scale and of a quality that is unequalled. We are proud of the trust placed in us by our customers and partners as we collaborate with them in a virtuous development model that serves people and the environment. As a responsible company and a world leader in Out-of-Home, JCDecaux continues to build upon the vision of our founder, putting service and sustainability at the centre of our business.

In our business practices, JCDecaux has always upheld core values relating to our employees, advertising clients, stakeholders and suppliers – key to our good reputation and the trust of our partners. We comply with the rules and regulations of the public authorities in our markets around the world and go further, setting ourselves even higher standards, as part of our vision for the role of media in our society. As a consequence, JCDecaux has been committed over the long-term to upholding the universal values of the following declarations: the United Nations' (UN) Universal Declaration of Human Rights (UDHR) adopted on 10/12/1948, the Convention on the Rights of the Child adopted on 20/11/1989, the Convention for the Protection of Human Rights and Fundamental Freedoms of the European Council adopted on 04/11/1950 and the Charter of Fundamental Rights of the European Union (EU) adopted on 07/12/2000.

Such principles include:

- freedom of expression
- freedom of trade and industry
- respect for human dignity and rights
- respect for gender equality
- rejection of racism, anti-Semitism and any or all discrimination based on membership of an ethnic group or cultural community, gender, sexual orientation and identity, philosophical and/or religious beliefs
- respect for child and teenage audiences
- rejection of violence and incitement to any unlawful act or act that endangers people's health and safety
- respect for decency, honesty and truthfulness.

JCDecaux's Code of Conduct sets the standard for our Group's display policy for advertising campaigns carried on our networks, in line with our values and these principles.

At a time of great change, the need for ethics and responsibility is more pressing than ever.

Faced with climate change, businesses are changing their production processes to move towards a low carbon economy with sustainable growth. At the same time, consumers increasingly value experiences that have service and sustainability at their heart. As this environmental transition continues, Out-of-Home has an ever greater duty to ensure that advertising communication about products and services carried on our media is responsible and ethical.

Environmental and sustainability-based criteria is of increasing importance to our advertising clients and stakeholders when it comes to choosing their media partners. JCDecaux's extra-financial performance has been recognised globally (CDP, MSCI, FTSE4Good) and the Group is well positioned as a socially responsible company that is playing our part in the climate change transition.

From a local and global perspective, our partners and clients expect to see ethical and responsible advertising on Out-of-Home, a view that is perfectly aligned with our long-term vision and with the UN's Sustainable Development Goals (SDGs). We have been working for a long time with our key advertising partners to raise awareness of the role that their brands can play in terms of their environmental impact. We are using our in-house and third-party expertise and our role as an intermediary between brands and local authorities to champion «Brand Urbanism» which is a collaborative initiative that seeks to leave a positive and sustained impact on regions and communities.

As we look towards a more sustainable future, JCDecaux's teams across the globe will continue to play an increasingly important part in shaping the responsible and ethical platform of Out-of-Home and the powerful and public platform of our worldwide communication channel.



III Code of Conduct – purpose and scope

1. PURPOSE

JCDecaux's Code of Conduct sets out a framework for the content that we choose to accept on our advertising sites and applies to JCDecaux SA (French Public Limited Company) and all Group companies.

The Code was developed by JCDecaux and draws upon a number of existing codes including: the International Chamber of Commerce (ICC) Advertising and Marketing Communications Code and follows recommendations provided by the International Council for Advertising Self-Regulation (ICAS) and regional and national authorities including the European Advertising Standards Alliance (EASA) and the French Professional Advertising Regulation Authority (ARPP).

2. SCOPE

This Code applies to all advertising/communication media. This includes posters, digital screens, banners and ambient media as well as all visual formats (PDF and JPG), digital content (mp4 format) and social networks, whether for commercial, promotional or non-monetary purposes, in all countries where JCDecaux operates.

The Code sets out the minimum guidance to be respected, in line with our values. The Code is intended to supplement any local laws and regulations which we comply with in each market.

If a local law or regulation means that a local JCDecaux business can not comply with a principle as it is outlined in the Code, the JCDecaux business, must as far as possible try to adapt or localise the principle so that it is consistent with the laws of the relevant authority.



IV Responsibility principles

Social responsibility

Advertising must respect human dignity and must not encourage or condone any form of discrimination, and in particular in terms of ethnic or national origin, religion, gender, age, disability, gender identity and/or sexual orientation.

Advertising must not reduce human beings to objects. Advertising must also not endorse the idea that a person is inferior because of their gender, origin, membership of a social group, sexual orientation and/or identity or any other criterion of discrimination. More specifically, advertising must not reduce a person's societal role and responsibilities.

Advertising must not promote direct or indirect feelings or behaviours of exclusion, intolerance or sexism.

Advertising must not exploit fear, unless and exclusively on justifiable grounds.

Advertising must not incite or endorse any unlawful or improper behaviour.

Advertising must not visually present or describe practices and/or situations that are dangerous or against health and safety, unless justified on educational or social grounds.

Advertising must be truthful and honest and must not allow any statement or visual representation that may spark irrational fears. All forms of exploitation and superstition must be strictly prohibited.

Advertising must not include any displays or acts of violence, whether direct or suggested, unless it is justifiable in the context of the product or service advertised. Inciting violence – whether moral or physical – is strictly prohibited.

Decency

Advertising must not include any visual presentation that goes against the established or commonly accepted norms in the country and culture concerned.

Trust

Advertising must not abuse consumer trust or exploit consumers lack of experience or knowledge.

Honest and Truthful

Advertising must prohibit any directly or indirectly misleading statement or visual presentation. This applies to content that is ambiguous or overstated.

Negative campaigns

Advertising must not discredit an organisation, profession, individual, group of individuals or a product in an unfair way.

Image rights

Advertising must not represent a person without their prior consent.

Intellectual property rights

Advertising must not use other company or organisation names, logos and/or brands without outlining a specific reason. Advertising must also not take unfair advantage of other companies'/organisations' reputation or of the prestige associated with other advertising campaigns.

Advertising must not include any imitation of the layout, text, slogan, visual presentation, music, etc., featured in other advertising campaigns which could mislead the consumer.

Children and young teenagers

Advertising must not capitalise on the credulity, loyalty, vulnerability or lack of experience of children and young teenagers.

Advertising must not minimise the level of skill and/or age required to use a product.

Advertising must not contain any statement or visual presentation that may cause psychological, moral or physical harm to children and young teenagers. Advertising must also not lead them into situations or activities that pose a serious risk to their health, psychological wellbeing or safety.

Advertising must not suggest a physical, social or psychological advantage over other children through owning or not owning a product or service.

Advertising must not undermine the authority, responsibility, judgement or tastes of parents. Advertising must acknowledge commonly accepted social and cultural values in country where it is displayed.

Environmental conduct

Advertising must not appear to endorse or encourage actions and practices that are unlawful and/or harmful to the environment.

Sustainable development

Advertising that makes use of the general idea of sustainable development or that presents material that is inconsistent with sustainability objectives must comply with the following principles: truthfulness and honesty, objectivity and trustworthiness:

1. Truthfulness and honesty: advertising must not deceive the general public regarding the true nature of the advertiser's activities and/or the characteristics of their products and services.
2. Objectivity: advertising must reflect the proportional nature of its message, when it is promoting sustainable development and the true nature of the advertiser's initiatives in this regard.
3. Truthfulness: advertising must not communicate the exclusive nature of an advertiser's initiative when it is comparable with those led by other advertisers.

Advertising must not appear to endorse working conditions which violate social and human rights.



V 5. Publication and application

1. PUBLICATION PROCEDURE

1.1. Publication and Code of Conduct compliance commitment - customers

JCDecaux is committed to promoting these values with all its stakeholders. This includes primarily companies in which JCDecaux has a majority ownership interest or a joint control; its advertising customers and partners and media agencies.

The Code is referenced in the General Terms and Conditions of Sale and/or Conditions of Service of JCDecaux Group business units to commit advertisers to fully comply with the terms.

As is the case for all documentation relevant to the JCDecaux Group standard (Code of Ethics, International Charter of Fundamental Social Values, Supplier Code of Conduct), this Code is available to access and download on the Group's public websites.

1.2. Publication and Code of Conduct compliance commitment - JCDecaux employees

All JCDecaux's employees are required to comply with the content of this Code (that is available on the local intranet of each of the Group's subsidiaries). The Marketing, Sales and Community Relations teams and local authority members responsible for ethical advertising must be made aware of this Code and the need to comply with it.

2. APPROVAL PROCEDURE FOR ADVERTISING CAMPAIGNS

The approval of campaigns must use the following recommendations which have been developed to ensure a consistent and clear process for how JCDecaux reviews advertising creative that we receive from media agencies and advertisers.

Local communities that are responsible for ethical advertising within the JCDecaux Group must base their approach on a factual assessment. It is critical that decisions are made on a local basis, but also in a way that is consistent and that follows the Group's shared principles outlined in this Code and with reference to a clearly identified and formally defined procedure.

2.1. Local Advertisement Display Committee or equivalent procedure

To ensure compliance with this Code, each country has established a Local Advertisement Display Committee that comprises people from across the business, including when possible: public affairs, legal, sales, marketing, sustainable development and communications departments.

Each Local Advertisement Display Committee must prioritise a way of working that works best for them in terms of efficiency and effectiveness.

Each Advertisement Display Committee must set up a local filing system to record campaigns that have been refused, accepted, or accepted with amendments, noting the details. Committees must regularly report their activities following the procedures defined elsewhere.

2.2. Regulatory and ethical monitoring of content

The Local Advertisement Display Committee must identify and be aware of any restricted or sensitive categories in their market, this may include: alcohol, smoking, gambling, food, products with restricted access for children, political advertising and image of people.

Before accepting an advertising/communication contract with an advertiser/partner, the creative must be reviewed before printing or publication. Its content must be assessed to make sure it complies with any local regulations and the principles outlined in this Code.

When managing a request for a campaign that falls into an identified sensitive category, the Local Advertisement Display Committee must set a deadline for the receipt of final creative visuals and/or campaign proposals, giving enough time for a compliance check or a prior opinion. The Committee must ensure that the content in question (visuals, proposals, contextual explanations etc.) are sent by the local sales department to all members of the Advertisement Display Committee for a reasoned assessment. This will result in one of the following outcomes:

- approval.
- approval subject to conditions. The decision to display/publish the campaign that is under review must be decided by the local sales department.
- refusal. Under such circumstances, only the local executive management team may make a reasoned decision to override the decision not to display/publish the campaign.



