



## GROUP CHARTER FOR RESPONSIBLE LOBBYING

Réf : PM-02-02-02-Cha-001

Version : 02

29/11/2021

Page 1 sur 4

# GROUP CHARTER FOR RESPONSIBLE LOBBYING

## Message from the Chief Executive Officer

The success, image and reputation of IN Groupe and its subsidiaries are the result of our commitment, our talents and our engagement.

Forging a reputation and building the company's image are unthinkable without uncompromising and impeccable ethics and compliance.

For this reason, the Executive Committee is proactively committed to complying with the rules of conduct set out in this Charter for Responsible Lobbying of public authorities and asks each employee, regardless of their hierarchical level, to read and comply carefully with the provisions of this Charter.

If, however, you have any questions about the interpretation of any of these principles, I advise you to consult your line manager and/or the Compliance Division.

The Executive Committee and I thank you for your vigilance and personal engagement in maintaining our group's integrity and reputation at the highest level, by applying the ethical and compliance principles shared by everyone on a daily basis.

Le succès, l'image et la réputation d'IN Groupe et de ses filiales sont le résultat de notre engagement, de nos talents et de notre implication.

Bâtir une réputation et construire l'image d'entreprise ne peut se concevoir que par l'exigence d'une éthique et d'une conformité sans compromis et sans faille.

C'est pourquoi le comité exécutif s'est engagé de manière volontariste à se conformer aux règles de conduite rappelées dans cette Charte pour une représentation d'intérêts responsable auprès des pouvoirs publics et demande à chaque collaborateur, quel que soit son niveau hiérarchique, de lire et de respecter à son tour attentivement les dispositions de cette charte.

Si toutefois, vous aviez des questions sur l'interprétation de l'un de ces principes, je vous engage à consulter votre responsable hiérarchique et/ou la direction de la Conformité.

Le Comité exécutif et moi-même vous remercions de votre vigilance et de votre implication personnelle pour maintenir l'intégrité et la réputation de notre groupe au plus haut niveau, et ce en appliquant au quotidien les principes éthiques et de conformité partagés par tous.

Paris, 29 November 2021

The Chief Executive Officer

« IN Groupe » means Imprimerie Nationale S.A. and its subsidiaries within the meaning of the French Commercial Code.

## 1. PURPOSE

In order to develop the business activities of IN Groupe and its subsidiaries, some employees may be required to have contact with the public sector.

Some of the development activities could be described as lobbying actions. When carried out, these lobbying activities are implemented in accordance with the laws and regulations in force.

This Lobbying Charter describes the general principles applicable to the lobbying activities carried out by IN Groupe.

## 2. ISSUES AND SCOPE

IN Groupe defines lobbying as « *any communication, written or verbal, between a representative or a lobby group and a public decision-maker for the purpose of influencing decision-making* ».

The objective of this Charter is to make the principles guiding the company's lobbying practices transparent to all Group stakeholders and to make a public commitment to respect ethical standards and principles in this matter.

The Charter applies to all employees of the Group and the subsidiaries and to Third Parties engaged in lobbying activities on behalf of the company at regional, national, European and international levels when appointed by the Group.

It applies to lobbying activities, i.e. activities aimed at influencing public decision-making, carried out at national, European and international levels.

## 3. ORGANISATION AND GOVERNANCE

The Director of Institutional Relations and External Communication is responsible for all IN Groupe lobbying activities.

This division coordinates lobbying actions internally and ensures that the positions taken within the Group are consistent.

There is also a network of Group business line employees who can be used for lobbying actions.

In this case, employees involved in such actions shall refer to the Director of Institutional Relations and External Communication given the importance of the subject or its cross-functional nature.

The IN Groupe lobbying activity is governed by procedures allowing employees and Third Parties appointed by the Group to comply with the rules of transparency and ethics governing these activities.

Where applicable, they declare their lobbying actions in a centralised directory in the Institutional Relations and External Communication Division.

#### **4. COMMITMENTS UNDERTAKEN BY IN GROUPE AND THE SUBSIDIARIES REGARDING RESPONSIBLE LOBBYING ACTIVITIES**

IN Groupe ensures that its lobbying activities are carried out with integrity and probity in compliance with the Group's Anti-Corruption Code, available on the IN Groupe website, and with applicable rules, laws and regulations.

An appropriate penalty shall be applied to any Group company representative or service provider who contravenes this Charter, up to and including termination of the contractual relationship between them and the Group.

In particular, IN Groupe ensures that appointed employees and Third Parties entrusted with lobbying activities:

- Are registered, if the thresholds for lobbying activities are exceeded, with the competent authorities where the rules so require, and provide them with any information directly related to their lobbying activity, including related expenses;
- Comply with applicable rules, laws and regulations that regulate lobbying activities or any other activity involving interaction with public representatives, such as the French Sapin II Law on the Prevention of Corruption and Influence Peddling, the US Foreign Corrupt Practices Act or the UK Bribery Act 2010;
- Endeavour to comply with all the aforementioned rules and in general the principles set out in the Group's Anti-Corruption Code (Code of Conduct and internal rules concerning the prevention of corruption and influence peddling, rules on confidentiality, on preventing conflicts of interest and on gifts and donations in particular).

#### **5. TRANSPARENCY**

Employees and Third Parties appointed by IN Groupe and in charge of lobbying actions on behalf of IN Groupe or its subsidiaries must declare their identity, function and connection with IN Groupe to the institutions and organisations they are involved with, as well as, where applicable, their registration number with the competent authorities.

When employees and Third Parties appointed by the Group carry out lobbying activities on behalf of IN Groupe, they ensure that the information required by the applicable laws (nature of the lobbying actions, identity of the people responsible for lobbying and the main professional associations, associated costs, etc.) is properly declared in the appropriate registers.