



Lobbying Ethics Charter



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This Charter is also available on [TDF website](#).

1 Scope

The current Charter applies to Tivana France Holdings (TFH) and all its subsidiaries (including TDF SAS), hereafter named the 'Group'.

Since 2014, the Group has become a member of the United Nations Global Compact. This voluntary initiative aims to support the universal principles on human rights, labour, and environment international standards, as well as anti-corruption.

The present Charter is brought to the attention of all internal and external lobbyists, all Group subsidiary general managers, who must be aware of its content.

It defines the rules to follow in all relations with the public sector.

2 Definition

Lobbying refers to any action carried out by one of the Group's interest representatives, aimed at directly or indirectly exercising influence over public authorities or providing them with information, with a view to guiding a political decision. The purpose of lobbying is to defend the Group's interests and provide public decision-makers with proposals and technical expertise regarding the consequences and practical scope of legislation in force or under consideration, without leading public authorities and decision-makers to expect any form of payment or undue advantage.

3 Governance

Within TFH Group, lobbying activities are placed under the responsibility of the Secretary General. Any lobbying activity in one of the Group's company requires prior written approval by the Secretary General (by mail or e-mail) and must be reported to him on a regular basis.

4 Engagements

Corruption is against the Law and against everything we stand for. The Group does not tolerate any bribery or corruption act (**zero tolerance policy**).

Any exception to the following rules must first be approved by the Group Secretary General and then received a written approval by either the Group CEO or the Group Deputy CEO.

4.1 Compliance

TFH Group undertakes to:

- Comply with the provisions of all applicable laws, notably:
 - French law no. 2013-907 of October 11, 2013 on transparency in public life: <https://www.legifrance.gouv.fr/loda/id/JORFTEXT000028056315/2021-01-20/>
 - French Sapin 2 Act, in particular, article 25 regarding the declaration of its business interest actions to the French public authorities, via the online registry provided by the French High Authority for Transparency in Public Life (HATVP):

<https://www.legifrance.gouv.fr/eli/loi/2016/12/9/2016-1691/jo/texte> et
<https://www.hatvp.fr/fiche-organisation/?organisation=342404399##>

In this register, the Group reports the names of interest representatives, type of interests defended, budgets allocated, professional association memberships.

- o The decree of May 9, 2017 concerning the online registry of interest representatives, modifying article 18 of French law no. 2013-907 of October 11, 2013 on transparency in public life:
<https://www.legifrance.gouv.fr/eli/decret/2017/5/9/ECFM1706418D/jo/texte>
- o The laws and regulations in force in the countries in which the Group operates;
- o The regulations pertaining to the organizations (trade, employer, professional) with which the Group is called on to carry out lobbying activities, in all the countries in which the Group operates.
- Declare its lobbying activities to the European Union (name of interest representatives, type of interests defended, budgets allocated) via the transparency register managed jointly by the European Parliament and the European Commission:
<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=402017316983-27>
- Comply with the Group's Code of Ethics:
https://www.tdf.fr/sites/default/files/TDF-Group_Code-of-Ethics.pdf
- Comply with the Group's ABC Procedure (intranet only):
<https://tdf1.sharepoint.com/sites/IntraTDFenBref/SitePages/Anticorruption.aspx>

4.2 Conflict of interests

Group lobbying activities are entrusted to people who do not themselves harbour interests that may be in conflict with those of the Group.

External as well as internal lobbyists cannot simultaneously exercise a national or European political mandate, be a parliamentary attaché, ministry advisor, national or international official.

4.3 Recruitment

It is forbidden to recruit former public civil servants, directly or indirectly implicated in the Group's economic field, before the end of the waiting period provided for by law (if applicable).

4.4 Intermediaries

Any lobbying firm that works for the group is subject to all controls as defined in the ABC procedure, notably full compliance with the current purchasing procedures (e.g., due diligence). These firms must comply to the present Charter.

The Group refuses to outsource lobbying activities that it will not do publicly under its own name.

It is forbidden to mandate or remunerate people exercising public responsibilities to represent or promote the Group's interests, participate in conferences or debates.

4.5 Political Contributions

Donations by the Group to political parties or financing (directly or indirectly) election campaigns of candidates are prohibited.

4.6 Sponsoring, Patronage and Charitable Donations

The Group favours sponsoring and sustaining cultural and charitable activities the choice of recipients of which is left up to the General Managers of the Group companies.

Donations to a charity are authorised only if:

- The Group clearly posts its commitment in this charity,
- This donation does not aim to gain an undue advantage.

5 Sanctions

Any employee or external lobbyist acting on behalf of the Group who contravenes the present Code will be exposed to sanctions (disciplinary or contractual, as well as penal).