

Lobbying Policy



ATALIAN GLOBAL SERVICES

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Since 1 July 2017, new rules have entered into force which aim to regulate the lobbying activities of companies.

In this context, the Sapin II law on transparency, the fight against corruption and the modernization of economic life, promulgated in December 2016, and a decree of 9 May 2017 on the digital directory of interest representatives, make it necessary to provide the Haute Autorité pour la Transparence de la Vie Publique (HATVP - French Transparency Authorities) with information relating to interest representation actions carried out towards public officials.

“Interest representation” or “lobbying” means the act of establishing and building a dialogue with a public decision-maker in order to influence a legislative or regulatory public policy decision. These influencing activities are carried out directly or indirectly with people who have public decision-making powers, and are intended to expose the challenges, explain the issues and promote the interests of the Group.

They are conducted by a legal or natural person interest representative or lobbyist, who may also be an ATALIAN Group employee.

It is therefore a question of establishing a regime of transparency of the possible relations between companies on the one hand, elected officials and administrations on the other hand, that is to say, to simplify, between economy and politics, not only in the interest of informing public authorities, but also for the benefit of society.

This Policy applies to all Employees, corporate officers, members of the Group Executive and Management Committees, and the worldwide subsidiaries.

1. Who may be considered as a «lobbyist»?

The texts define two categories of lobbyist:

- legal persons governed by private law for which the main or regular activity of a director, employee or member is to influence public decision-making by communicating with:
 - A member of the Government, or a cabinet member;
 - A deputy, a senator, a member of the staff of the President of the National Assembly or of the President of the Senate, of a deputy, of a senator or of a parliamentary group, as well as with the agents of the services of the parliamentary assemblies;
 - A member of the staff of the President of the Republic;
 - The Director General, the Secretary General, or their deputy, or a member of a panel or a committee vested with sanctioning powers of certain independent administrative authorities and independent public authorities;
 - Officials appointed to jobs within the Council of Ministers at the decision of the government;
 - Certain local elected officials and their staff (category of public officials for whom the law has not yet entered into force);

- A public official holding a position mentioned in Decree n°2016-1968 of 28 December 2016 on the obligation to submit a declaration of financial situation (category of public officials for whom the law has not yet entered into force).
- natural persons, who are not employed by the aforementioned legal persons governed by private law and whose main or regular activity is to influence public decision by entering into communications with the aforementioned persons (see the list above).

The term "**main activity**" applies when more than half of the person's time is devoted to the interest representation activity (criterion assessed per period of 6 months). When the company's organisational chart indicates the existence of a public affairs manager, the person's main activity is presumed to be interest representation.

The term "**regular activity**" applies when the person has conducted at least ten interest representation actions over a continuous period of 12 months.

2. Ethics rules for lobbyist

The ATALIAN Group is committed to conducting its relations with public decision-makers in compliance with the applicable regulations. In this context, any lobbying action must be conducted in accordance with the ethical rules set out in the ATALIAN Group Code of Conduct and in its various policies, notably in terms of gifts and invitations.

If these lobbying actions were to be carried out by representatives from outside the Atalian Group, their integrity must be the subject of an assessment before any approach, and they must undertake to apply the Atalian Group Code of Conduct in all of their future actions.

The following are notably prohibited for any lobbyist, internal or external to the ATALIAN Group:

- Offering or giving, to public persons covered by the SAPIN II law or to politically exposed persons, gifts, donations or benefits of any kind, notably gifts or invitations that do not comply with the ATALIAN Group's Gifts and Invitations Policy;
- Granting any hiring request for a candidate recommended by a political decision-maker with whom an interest representation action is being carried out or a request for a donation to a charity in which the ultimate beneficiary is the decision-maker in question;
- Any remuneration of a third party to exercise or continue to exercise influence over the public decision-maker with whom an interest representation action is in progress;
- Inciting these people to violate or circumvent the ethical and control rules applicable to them;
- Taking any steps with these persons in order to obtain information or decisions by fraudulent means or by using manoeuvres intended to deceive them;
- The organisation of conferences, events or meetings in which the speaking arrangements of the public officials in question are linked to the payment of remuneration, in whatever form.

3. Ethics alert

The ATALIAN Group has set up an external platform for the collection of ethical alerts, accessible to everyone, both inside and outside the Group, at <https://ethicslineatalian.com>, which you can also access via Atalink / Engagement / Compliance, as well as on atalian.com and atalian.fr. This platform can also be used to ask questions or raise concerns about possible breaches of ethics and this Code. Or you can contact us via our new phone number **+90 0800 621 6464**. The country organization code you need to use is **1944**.

The confidentiality of the whistleblower's identity, of the facts mentioned in the alert, as well as of the implicated persons, is preserved at all times during the procedure for collecting and processing alerts.

Alerts can be launched anonymously.

The whistleblower acting in good faith has a specific status that protects him/her from any retaliation resulting from the alert and in connection with the reported facts.

These alerts will be processed in accordance with the procedure for collecting and processing ethics alerts, available on Atalink / Compliance, as well as on atalian.com and atalian.fr.