

# CHARTER FOR RESPONSIBLE ADVOCACY WITH PUBLIC AUTHORITIES AND REPRESENTATIVE INSTITUTIONS

Societe Generale wishes to make an active contribution to the work of regulatory authorities at all levels of governance. To be effective, a public decision must take into account all constraints incumbent on a sector and involve the relevant actors at each stage of the decision-making process. Amidst intense changes in regulations, Societe Generale wants to bring to the attention of public decision-makers useful information on the potential impacts of planned regulations or on gaps in existing regulations. Societe Generale feels that its international scope and diverse expertise endow it with a useful vision and perspective. It can supply information on a broad range of banking activities and their interactions with the financing of the economy, doing it in the general interest. Comparing points of view enriches democratic debate, and the Group seeks to make a contribution to it, while respecting the positions of each side, with all stakeholders (public authorities, trade-unions, NGO representatives, international organisations, and others).

Societe Generale exercises its advocacy activities in accordance with its overall approach and its corporate social responsibility (CSR) commitments and the bank pledges to promote good practices in this area within the professional associations of which it is a member.

## Purpose

This charter establishes the Group's main rules regarding advocacy with public authorities and representative institutions. It is public and available on the Group's website.

## Charter scope of application

This charter applies to all Societe Generale employees who undertake, on the company's behalf, advocacy with institutional and civil society entities in France, Europe and internationally. It has been established in compliance with the Group Code of Conduct.

## The Group Public Affairs set-up

The Group Public Affairs Department coordinates and leads advocacy with public authorities and representative institutions. Its role is to anticipate regulatory changes, and to analyse their potential repercussions, in order to allow Senior Management to establish an official Group stance, to explain and promote this stance with public officials worldwide, the appropriate professional associations and, more broadly, with representative institutions.

The Group Public Affairs Department is a small team reporting to the Group Corporate Secretary and backed by a Group-wide network of correspondents taking part in developing positions and enforcing these positions within the Group.

The Group Public Affairs Department works at all times with the Senior Management to decide on priorities and prepare and coordinate contacts with the authorities (ministers, ministry staffs, members of parliament, the European Union, etc.).

Societe Generale takes part in many task forces, professional organisations and other institutions on a national (France), European and international level. The Group contributes to their work, their position-taking, and their advocacy with public officials. The list of the main organisations of which Societe Generale is a member is provided in the Appendix.

The Group Public Affairs Department adheres to all directives and instructions pertaining to the Group's operations and its anti-corruption provisions in particular.

## Group commitments

Societe Generale pledges:

1. To declare itself to institutions with which advocacy activities are conducted when such institutions possess registers, and to comply with the Code of Conduct that comes with being entered into transparency registers;
2. Not to incite members of the organisations with which the Group is in contact to violate the rules and standards of behaviour applicable to them;
3. Not to obtain or to seek to obtain information or decisions in an illegal manner or by exercising abusive pressure or inappropriate behaviour;
4. To disseminate only that information that, to its knowledge, is reliable, verifiable and up-to-date;
5. To ensure that public affairs firms and external consultants with which the Group occasionally works consent to this Charter and agree to abide by its terms;
6. To respect political neutrality and to refrain from supporting political organisations or activities with donations or subsidies, even if allowed by local legislation;
7. To ensure that Group Public Affairs employees refrain from accepting any national or European political office throughout the term of their duties;
8. To ensure that employees concerned by this Charter, like all Group employees, comply with the Group's Code of Conduct and internal rules regarding gifts, invitations and preventing corruption;

9. To ensure that employees and public affairs firms and external consultants, if any, identify themselves and disclose whom they represent with the institutions and organisations with which they work;
10. To disseminate public positions to the teams concerned directly or indirectly by the public advocacy activities;
11. To urge the professional associations of which the Group is a member to disclose the main positions submitted to public officials, particularly on their websites;
12. To ensure that persons in permanent charge of the Group's advocacy activity possess the skills that are necessary for exercising their duties, receive instructions, or regular training in their field of activity.

## Appendix

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List of the main professional associations, think tanks and other institutions at the national (France), European and international level of which Societe Generale is a member:

At the national level:

- Association française de la gestion financière (AFG-ASSFI)
- Association française des entreprises privées (AFEP)
- Association française des marchés financiers (AMAFI)
- Association française des professionnels des titres (AFTI)
- Association française des sociétés financières (ASF)
- Fédération bancaire française (FBF)
- Fédération française des sociétés d'assurances (FFSA)
- Mouvement des entreprises de France (MEDEF)
- Paris Europlace

At the European level:

- Association for Financial Markets in EU (AFME)
- Bruegel
- Eurofi
- Euronext
- European Issuers
- European Securities Forum (ESF)
- European Banking Federation (EBF)
- Inter-alpha
- International Banking Circle (IBC)

At the international level:

- CFO network
- Global Financial Markets Association (GFMA)
- Groupement d'intérêt économique Cartes Bancaires (GIE CB)
- Institute of International Finance (IIF)
- International Capital Markets Association (ICMA)
- International Swaps and Derivatives Association (ISDA)
- Securities Industry and Financial Markets Association (SIFMA)
- Society for Worldwide Interbank Financial Telecommunication (SWIFT)
- The Business and Industry Advisory Committee to the OECD (BIAC)

In environmental and social areas:

- Entreprises pour l'Environnement (EpE)
- United Nations Global Compact
- Wolfsberg Group
- Observatoire de la responsabilité sociétale des entreprises (ORSE)
- Equator Principles
- United Nations Environment Programme Finance Initiative (UNEP-FI)