



RÉMY COINTREAU

Terroir, people and time

Lobbying Policy

INTRODUCTION

The Rémy Cointreau lobbying and representation of interests policy (hereinafter the "**Lobbying Policy**") explains how Rémy Cointreau Group employees can interact with public officials in the context of promoting the Group's interests.

Within Rémy Cointreau Group, lobbying or representation of interests activities are generally carried out through federations or organizations that represent the Group's business sector and by the Group's Public Affairs Department. This Lobbying Policy supplements **the rules laid down in the Code of Conduct** and aims to implement **the key principles defined by laws and regulations to fight corruption, influence peddling and breaches of probity requirements**, and more generally by laws governing interaction between company representatives or agents and public officials.

This Lobbying Policy must be implemented having regard for **the rules defined in the Rémy Cointreau policies**, in particular in the gifts and hospitality policy. Furthermore, any interaction with a public official through an organization or federation is governed by the Third-Party Due Diligence Policy and must give rise, where applicable and in addition to the rules set out below, to due diligence measures as stipulated in that policy.

1. Definitions

A **public official** is a government employee, an elected or otherwise appointed official, or an employee, whether permanent or otherwise, of a ministerial department, a national or federal administrative authority or agency, a federated state or a local authority. In general, any entity directly or indirectly owned by any of the above authorities will be considered a public entity.

For the purposes of this definition, a public official means any person whose role or position involves overseeing or influencing the interests of the company or the interests of the sector in which Rémy Cointreau operates.

A **lobbyist** is a natural or legal person who represents interests to a public official, with the aim of informing or influencing a public decision in line with the interests it represents.

2. General Principles

More and more countries are introducing regulations on lobbying activities. For example, in the United States, lobbying is regulated by the **Lobbying Disclosure Act** passed in 1995. In France, the **2013 Act on transparency in public life**¹ introduced a similar regulation.

These regularly changing laws and regulations govern the profession of lobbyist, as well as any regular corporate activity aimed at influencing public decision-making in the interests of one or more companies or interest groups. They include obligations to declare contacts made within public authorities and the costs incurred for the purpose of representing interests (for example, in France, lobbyists must be declared to the High authority for transparency in public life. Lastly, they generally stipulate specific rules for access to public procurement contracts or for issuing authorizations to use public land or property.

Failure to comply with these rules may result in specific administrative or criminal penalties, without prejudice to any criminal charges on grounds of corruption, influence peddling or, more generally, breaches of probity requirements.

The following principles should therefore be observed:

- i. **Be particularly vigilant** whenever any contact is made with a public official as defined above;
- ii. **Check whether any specific legislation or regulations on lobbying apply;**
- iii. **Do not unlawfully influence or fraudulently obtain information or decisions;**

¹ French Act No. 2013-907 of 11 October 2013.

- iv. Apply the rules laid down in the Rémy Cointreau **Code of Conduct and Gifts and Hospitality policy** at all times;
- v. If the employee is not a member of the Public Affairs team, **written approval from the Group Public Affairs Director must be obtained** before engaging in any lobbying or representation of interests activity;
- vi. Perform an **integrity check on the organization or federation acting as a lobbyist for the Rémy Cointreau Group** (clean conviction record, no negative or unfavorable news/articles in the press, etc.); check that the entity has the **necessary experience** to perform its role; and check that the by-laws of the organization or federation are consistent with the services requested;
- vii. **Document the services provided** by the organization or federation.
- viii. **Keep precise accounts** of all actions identified as possibly being lobbying or interest representation actions, particularly in order to be able to provide any declaration or justification that may be required under laws and regulations in force in the countries concerned.

3. Notion of representation of interests ("Lobbying")

➤ Lobbying Activities

The definition of lobbying may vary depending on the rules applicable in each jurisdiction.

In general, **any oral or written communication with a public official with the aim of informing and/or influencing a decision to be made should be considered a possible lobbying activity.**

For example, the situations described below are regarded as lobbying activities (this list is non-exhaustive):

- Making contact with a member of Parliament or a government employee to discuss and attempt to influence the passing, adoption or introduction of a standard, an act or a regulation;
- Making contact with a committee responsible for defining rules or tariffs;
- Influencing the award or the definition of the terms of a contract with a public authority or any other individual decision to be taken by a public entity.
- Making frequent or targeted contact with public officials with the aim of fueling and/or influencing legislative or administrative action.
- Hiring a service provider to lobby for or represent the interests of Rémy Cointreau;

Whenever the communication as described above is initiated by an employee or representative of the Rémy Cointreau Group, it could be a lobbying activity, whether this communication is made in the name of the Group or any of its subsidiaries, or through an organization or federation in which the Group or any of its subsidiaries participates.

Legislation on lobbying may provide for **exceptions** where:

- the communication as described above is initiated by the public official and not by an lobbyist or an employee of the company concerned (for example, when a public official initiates a discussion at a trade fair);
- the communication is occasional and not regular. The law may define a threshold to mark the boundary between communications considered to be occasional and activity that is regular (for example, in France, the threshold is ten contacts per year);
- the communication is made solely to meet the company's legal or regulatory obligations, and not to influence a new standard or decision.

In all cases, employees should bear in mind that lobbying legislation is not harmonized internationally and can change rapidly.

➤ **Activities not generally considered to be lobbying**

Some employees need to interact with public officials in the course of their day-to-day work, for example, to meet declaratory obligations, to respond to requests for information, or to apply for permits.

Great care should be taken at all times when engaging in such communications to make sure that they are both appropriate and lawful.

They do not generally constitute lobbying activities.

However, if an employee is in any doubt, they should query the Public Affairs Department or the Compliance Department, to determine whether any given communication action is likely to be considered as lobbying.

4. Procedure applicable to lobbying

If the employee is not a member of the Public Affairs team, lobbying activities require **the prior written approval of the Group Public Affairs Director** and, when necessary, of the **subsidiary managing director**.

5. Political involvement

The Rémy Cointreau Group does not authorize the financing of political activities and prohibits political involvement of any kind on the group's behalf.

Nevertheless, employees have the right to participate individually in a political activity. Employees engaging in personal political activity must do so as private citizens, not during paid work hours, and without using company resources.

6. Accounting

The resources and sums disbursed in connection with lobbying must be accounted for by the persons designated as responsible for these activities in order to be able to justify their use (i) either within the framework of the lobbying law of the country concerned; or, (ii) in any case, for internal reporting purposes within the Rémy Cointreau Group.

The Public Affairs Department defines the rules governing decisions and the use of funds and resources allocated to it, in compliance with the Group's rules on preventing conflicts of interest and internal control.

The accounting for funds and resources allocated to the Public Affairs Department is subject to financial control as applicable within the Rémy Cointreau Group.

7. Sanctions

Any breach of the rules set out in this Lobbying Policy may give rise to disciplinary action and sanctions, up to and including dismissal, without prejudice to any civil action in respect of the loss suffered by the Rémy Cointreau Group and its subsidiaries.

8. Reporting a breach

Any employee who detects a breach of this Policy is encouraged to report it to their manager or to the Compliance Department.

They may also report the breach via the Ethics Line at: ethics.alert@remy-cointreau.com. The Compliance Department receives the concerns raised via the Ethics Line.

9. Contact

For any question about this Policy, contact the Public Affairs Department or the Compliance Department at: compliance@remy-cointreau.com.

DOCUMENT HISTORY

Version	Date	Owner	Update
Version 1	October 2023	Group Compliance Department with the contribution of the Group Public Affairs Department	Document created