



## **Charter for responsible representation with respect to the public authorities**

### **Article 1 - Purpose**

Where its activities may be impacted by an initiative taken by the public authorities in countries in which it operates, or where it is consulted by these public authorities in respect of a new project or for any other reasons, the BNP Paribas Group may wish to assert its point of view, as any citizens have the right to do.

BNP Paribas is a responsible bank, committed to serving its customers. Accordingly, it intends to make a constructive contribution to the democratic process by providing public decision-makers, in strict compliance with legal and ethical rules, with information to assist their discussions and to help them to take fair and informed decisions.

For this purpose, BNP Paribas carries out representation activities with respect to the public authorities (hereinafter "public representation"), as provided for in the existing legislation, regulations and ethical codes.

### **Article 2 - Scope of application**

This Charter applies to all Group employees in all countries. It applies to activities carried out in countries in which the Group operates, and at European and international levels.

### **Article 3 - Integrity**

BNP Paribas shall be listed on registers of representatives in jurisdictions where the Group carries out public representation activities on a regular basis.

The BNP Paribas Group shall:

- comply with the codes of conduct and charters of institutions and organisations with respect to which it carries out public representation activities (e.g. the code of conduct relating to the transparency register implemented by the European Parliament and the European Commission);
- comply with rules for obtaining and circulating official documents, and forbid itself to distribute them for gain;



- act with integrity and honesty with institutions and organisations with respect to which it carries out public representation activities, and provide its interlocutors with up-to-date, reliable and objective information that does not mislead them;
- forbid itself to exert illegal influence and obtain information or influence decisions in a fraudulent manner. In particular, BNP Paribas shall undertake not to use improper pressure or to have an inappropriate behaviour towards members of institutions and organisations with respect to which it carries out public representation activities;
- not encourage members of institutions and organisations with respect to which it carries out public representation activities to infringe the rules of conduct that apply to them, particularly regarding conflicts of interest, confidentiality and compliance with their ethical obligations;
- ensure that the behaviour of employees concerned by this Charter is in accordance with its Code of Conduct and with the Group's internal rules<sup>1</sup> regarding the prevention of corruption, gifts and invitations;
- ensure that any external consultants who may be engaged comply with strict ethical rules that are in accordance with this Charter.

#### Article 4 - Transparency

BNP Paribas shall make its approach clear: BNP Paribas' employees and any external consultants who may be engaged must inform the institutions and organisations with which they are in contact about who they are and whom they represent.

BNP Paribas shall also undertake to be transparent about the organisation and budget of the teams carrying out public representation activities, notably via its website. Their membership of professional associations shall be made public.

The Group shall also undertake to publish its main public positions on its website.

#### Article 5 - Social responsibility

The Group and its employees shall undertake to ensure that the Group's public representation activities do not challenge, distort or contradict the internationally recognised principles of corporate social responsibility (CSR), which are implemented with determination by BNP Paribas: the United Nations' Universal Declaration of Human Rights and Global Compact, the fundamental conventions of the ILO<sup>2</sup> and initiatives of the OECD<sup>3</sup>. In particular, BNP Paribas exercises its advocacy activities in line with its overall approach and public commitments relating to the environment and climate change, including its support for the objectives of the Paris Agreement. BNP Paribas shall also undertake to comply with universal democratic values<sup>4</sup>.

<sup>1</sup>Global group policy regarding corruption (September 2011) and Gifts and invitations policy (March 2012)

<sup>2</sup>International Labor Organization

<sup>3</sup>[The OECD's CSR guidelines](#), updated in 2011; the OECD's Principles for Transparency and Integrity in Lobbying, 2010

<sup>4</sup>[The European Union's Charter of Fundamental Rights](#), 2000



## Article 6 - Internal training and information

BNP Paribas shall:

- undertake to provide regular training to the employees concerned regarding best practices in public representation activities;
- ensure that all teams concerned - directly or indirectly - by public representation activities have access to the Group's main public statements in relation to ongoing matters.

## Article 7 - Governance

The Group's employees shall not carry out public representation activities without the authorisation of their superiors. They shall undertake to report on their activities to their superiors and to the Institutional Affairs Department in respect of the most important matters.

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