



# Charter for responsible lobbying and advocacy activities with respect to governmental bodies and officials

## ***Introduction and general principles***

Natixis is a financial institution accountable and committed to the interests of its clients, shareholders and business partners. Natixis considers that dialogue and respectful exchanges of points of differing views are important for the democratic functioning of public institutions. Natixis believes that contributing in legislative and regulatory processes in an open and transparent way is beneficial to the democratic process generally. The firm considers it appropriate to promote its point of view by engaging in dialogue with public and government officials on proposed legislative and regulatory requirements that affect Natixis' business as well as its ability to serve its clients. In doing so, Natixis is committed to ethical lobbying and advocacy practices and compliance with all applicable laws, rules and regulations.

In addition, Natixis is committed to ethical conduct and compliance with applicable laws and regulations in its business dealings with governmental entities. At Natixis, business dealings with governmental entities are covered by the internal control framework set up by the relevant business line to ensure compliance with laws and good practices. Those frameworks are regularly reviewed by the internal controls teams, compliance or internal audit.

## ***Scope of application***

This Charter applies to Natixis and all entities controlled by Natixis (hereinafter "Natixis") and to employees of these entities globally. It applies to lobbying and advocacy activities (i.e. activities intended to influence governmental decisions, such as legislation or policies) conducted at the local, state, national, European and international levels.

## ***Purpose of this Charter***

This Charter sets out the high-level principles by which Natixis conducts its lobbying and advocacy activities. The Public Affairs Department, which reports to the Secrétaire General of Natixis SA (a Senior Management Committee member) is responsible for overseeing advocacy and lobbying activities at the local, state, national, European and international levels of government in accordance with this Charter.

The Public Affairs Department coordinates Natixis' advocacy and lobbying actions internally and with its parent company, BPCE, to provide consistency in the Natixis' advocacy and lobbying positions. Advocacy and lobbying activities are carried out either directly by appointed personnel, or indirectly through professional associations of which Natixis is a member.

## ***Concrete commitments to ensure the integrity of lobbying and advocacy activities***

Natixis is committed to ensuring the integrity of its lobbying and advocacy activities in compliance with the Natixis Code of Conduct (available on its website) and applicable laws, rules and regulations. This includes requiring that persons engaged in lobbying and advocacy activities:

- Are registered with the applicable authorities, if required, and communicate all relevant information including the expenses associated with lobbying and advocacy activities;
- Comply with applicable laws, rules and regulations that govern lobbying, advocacy efforts and other interactions with governmental officials and bodies, such as the French SAPIN II law (Law 2016-1691 of 27 December 2016), the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Persons engaged in lobbying and advocacy activities shall not:
  - Provide gifts to government officials, with values above the upper threshold as determined by local standards or internal rules, in situations that can be considered as influencing decisions; and
  - Attempt to obtain information or decisions from government officials by fraudulent means, abusive pressure, misleading information or inappropriate behavior or to jeopardize their impartiality.

- Comply with applicable codes of conduct, including those of governmental bodies with whose employees Natixis lobbies or advocates. These may include rules regarding bribery and fraud prevention, protection of confidentiality, management of conflicts of interest and limitations on gifts, entertainment and other benefits.
- Ensure that external consultants retained by Natixis to conduct lobbying efforts are subject to strict ethical rules that conform to this charter. Relationships with external consultants are subject to specific due diligence and must have appropriate contractual controls in place.

### ***Transparency***

People engaged in lobbying activities on behalf of Natixis, whether employees or external consultants, shall disclose their identity and their relationship to Natixis to the governmental institutions and organizations with which they engage. They must disclose their registration number to the competent authority where appropriate (e.g., Transparency Register number when contacting EU officials). Where relevant, they must identify whether they represent their company or the trade association they accompany.

In addition, people engaged in lobbying and advocacy activities on behalf of Natixis must ensure that all legally required information is provided as mandated by applicable laws, rules and regulations (e.g., nature of representation actions, identity of people in charge of representation actions, principal professional associations to which they belong, associated costs, etc.).

### ***Social Responsibility***

Natixis conducts its lobbying and advocacy activities in a manner consistent with its approach to social and environmental responsibilities as described in the Natixis Registration Document.

### ***Training***

Natixis commits to train regularly its employees who may engage in lobbying and advocacy activities regarding the principles of this Charter and all applicable laws, rules and regulations governing the lobbying and advocacy activities.

### ***Governance***

Natixis conducts its lobbying and advocacy activities in accordance with procedures that require employees to comply with applicable transparency and ethical rules. Natixis and its subsidiaries have in place policies and procedures consistent with this Charter and its objectives. If required by any applicable rule, law or regulation, Natixis employees report their lobbying and advocacy activities in a centralized internal registry.

All lobbying and advocacy activities are under the responsibility of Natixis Senior Management. The Public Affairs Department coordinates the employees engaged in advocacy and lobbying activities. In that sense, business lines appoint Public Affairs representatives. Employees who are involved in lobbying and advocacy activities shall inform the Public Affairs Department of the impact and the transversality of the issues with which they deal.

The Global Conduct Committee, chaired by the Natixis Chief Executive Officer, regularly reviews Natixis' compliance with this Charter.

## Appendix

Main professional associations of which Natixis is a member, directly or indirectly:

In France:

1. ACI France AFTB - <http://www.acifrance.org>
2. Association française de la gestion financière (AFG) - <http://www.afg.asso.fr/>
3. Association française des entreprises privées (AFEP) - <http://www.afep.com/>
4. Association française des investisseurs en capital (AFIC) - <http://www.afic.asso.fr/>
5. Association française des marchés financiers (AMAFI) - <http://www.amafi.fr/>
6. Association française des professionnels du titre (AFTI) - <http://www.afti.asso.fr/>
7. Association française des sociétés de placement immobilier - <http://www.aspim.fr/>
8. Association française des sociétés financières (ASF) - <http://www.asf-france.com/>
9. Association France des Banques (AFB) - <http://www.afb.fr/>
10. Fédération bancaire française (FBF) - <http://www.fbf.fr>
11. Fédération du e-commerce et de la vente à distance (FEVAD) - <https://www.fevad.com/>
12. Fédération française des sociétés d'assurances (FFSA) - <http://www.ffsa.fr/>
13. Le Groupement français des bancassureurs (GFB)
14. Mouvement des entreprises de France (MEDEF) - <http://www.medef.com/>
15. Paris Europlace - <http://www.paris-europlace.net/>

At the national level:

1. Asociación de Instituciones de Inversión Colectiva y Fondos de Pensiones (INVERCO) - <http://www.inverco.es/>
2. Asset Management Association of China (AMAC) - <http://www.amac.org.cn/cms/site/preview?ID=23>
3. Association of Institutional INVESTORS - <http://association.institutionalinvestors.org/>
4. Association of Foreign Banks in Germany (VAB) - <https://www.vab.de/English/Home/>
5. Association for Spanish asset managers
6. Associazione nazionale consulenti finanziari (Anasf) - <http://www.anasf.it/>
7. European chamber of commerce Taiwan (ECCT) - <http://www.ecct.com.tw/>
8. Association of the Luxembourg Fund Industry (ALFI) - <http://www.alfi.lu/>
9. Boston Chamber of Commerce - <https://bostonchamber.com/>
10. Forum per la Finanza Sostenibile (Italian association for socially responsible investments) - <http://finanzasostenibile.it/>
11. Hong Kong Investment Funds Association (HKIFA) - <https://www.hkifa.org.hk/eng>
12. Investment Adviser Association (IAA) - <https://www.investmentadviser.org/home>
13. Investment Association - <https://www.theinvestmentassociation.org/>
14. Investment Company Institute (ICI) - <https://www.ici.org/>
15. Investment Management Association of Singapore (IMAS) - <http://www.imas.org.sg/>
16. Investment Trusts Association, Japan - <https://www.toushin.or.jp/english/>
17. Italian Association of Financial Market professionals (ASSIOM) - <http://www.assiomforex.it/>
18. Italian Private Banking Association (AIPB) - <http://www.acepi.it/en/content/aipb-italian-private-banking-association>
19. Japan Investment Advisers Association (for discretionary investment management) (JIAA) - [http://www.jiaa.or.jp/index\\_e.html](http://www.jiaa.or.jp/index_e.html)
20. MEFOP (Italian association for the development of the Italian pension funds market) - <https://www.mefop.it/>
21. New England Council - <https://newenglandcouncil.com/>
22. Pension & Lifetime Savings Association (PLSA) - <https://www.plsa.co.uk/>
23. PensioPlus - <http://pensioplus.be/>
24. Securities Investments Trust and Consulting Association (SITCA) - <http://www.sitca.org.tw/ENG/SitcaData/SD1002.aspx?PGMID=SD0102>
25. Spainsif - <https://www.spainsif.es/>
26. Swiss Fund and Asset Management Association (SFAMA) - <https://www.sfama.ch/fr/bienvenue>

27. Taiwan Mergers Acquisitions and Private Equity Council (MAPECT) - <http://www.mapect.com/en/>
28. UK Finance - <https://www.ukfinance.org.uk/>
29. VV&A (Dutch association of asset managers)

At the European and international levels:

1. Association of Financial Markets in Europe (AFME) - <http://www.afme.eu/>
2. Association of Investment Management Sales Executives (AIMSE) - <https://www.aimse.org/index.cfm>
3. EUROFI - <http://www.eurofi.net/>
4. Eurofinas - <http://www.eurofinas.org/>
5. European Association of Co-operative Banks (EACB) - <http://www.eacb.coop/>
6. European Banking Federation (EBF) - <http://www.ebf-fbe.eu/>
7. European Banking Group (EBG) - <https://www.ebg.net>
8. European Banking Industry Committee (EBIC) - <http://www.eubic.org/>
9. European Financial Planning Association (EFPA) - <https://www.efpa-eu.org/>
10. European Financial Services Round table (EFR) – <http://www.efr.be>
11. European Fund & Asset Management Association (EFAMA) - <http://www.efama.org/>
12. European Parliamentary Financial Services Forum (EPFSF) - <http://www.epfsf.org/>
13. European Savings Banks Group (ESBG) - <https://www.wsbi-esbg.org>
14. Focusing Capital on the Long Term Global (FCLTGlobal) - <https://www.fcltglobal.org/>
15. Insurance Europe - <http://www.insuranceeurope.eu/>
16. Institute of International Bankers (IIB) - <https://iib.int>
17. Institute of International Finance (IIF) - <http://www.iif.com>
18. International Capital Market Association (ICMA) - <http://www.icmagroup.org/>
19. International Swaps and Derivatives Association (ISDA) - <https://www.isda.org>
20. Investment Compagny Institute Global (ICI Global) - <https://www.iciglobal.org/iciglobal>
21. Mercer Global Investment Forum - <http://www.mercersignatureevents.com/investmentforums/2018/index.shtml>
22. Mutual Fund Education Association (MFEA) - <https://mfea.com/>
23. Securities Industry and Financial Markets Association (SIFMA) - <https://www.sifma.org>
24. Sovereign Investor Institute - <https://www.iimemberships.com/Sovereign-Investor-Institute>

Other associations:

1. Brueghel
2. Confrontations Europe
3. Equator Principles
4. Le cercle des économistes
5. Observatoire de la responsabilité sociétale des entreprises (ORSE)



30, avenue Pierre Mendès France  
75013 Paris  
Tél. : +33 1 58 32 30 00  
[www.natixis.com](http://www.natixis.com)



Last updated: October 12th, 2018

