

SOCIETE GENERALE OBLIGATIONS FOR A RESPONSIBLE ADVOCACY

SOCIETE GENERALE CHARTER FOR RESPONSIBLE ADVOCACY WITH PUBLIC AUTHORITIES AND REPRESENTATIVE INSTITUTIONS

Since February 2014 and in accordance with its Code of Conduct, the Group has officially adopted a written framework for promoting a responsible advocacy towards public authorities. Enshrined in a “Charter for responsible advocacy with public authorities and representative institutions”, the established principles transpose within the Group the obligations contained in the Common Declaration of Transparency International France (see below).

Applying to all its employees, this Charter holds true for the Group subsidiaries and branches in France and abroad. It notably states that “[the Group] pledges to respect political neutrality and to refrain from supporting political organizations or activities with donations or subsidies, even if allowed by local legislation”.

In January 2018, the Group has taken further steps forward in designing a dedicated governance to ensure an in-depth monitoring of all advocacy activities undertaken.

[Charter](#) & [Common Declaration](#)

EUROPEAN INSTITUTIONS REGISTER

By signing up to the European institutions register, the Group commits to provide the number of people involved in advocacy activities, the key issues addressed, the Group's membership and affiliation (associations, think tanks or other bodies) and financial information. In this last section, the Group reports the estimated annual costs resulting from the reported activities. Information are updated on a yearly basis.

[SG profile](#)

SAPIN II LAW: REGISTER OF THE HIGH AUTHORITY FOR TRANSPARENCY IN PUBLIC LIFE (HATVP)

The Sapin II Law has defined a framework for the carrying on of advocacy activities towards French public decision-makers, and has set up a register managed by the HATVP.

In practice, within the Group, this scheme concerns Société Générale Paris Metropole (SGPM).

According to these new requirements SGPM released a nominative list of persons carrying on advocacy activities within it, the scope of these activities, the number of people employed in that advocacy mission, and the professional organizations/associations in relation with represented interests.

SGPM also published its annual report describing each advocacy action undertaken within the scope of the Law, with the following information: type of public decision, type of advocacy action initiated, their topic and the category of public decision-maker with whom the employee has made contact.

[SG profile](#)

US ADVOCACY ACTIVITIES

Societe Generale conducts its advocacy activities in the US in accordance with the Lobbying Disclosure Act (LDA), as amended by the Honest Leadership and Open Government Act (2007). Because of the de minimis nature of the Group advocacy activities in the US, it is currently not required to register under the LDA, nor to report the related expenditures.

GROUP'S GOVERNANCE AND EXPENDITURES

Together with the Compliance and Legal Department, the Group Public Affairs ensures the monitoring of the above-mentioned obligations. **Below are the aggregated expenditures of the Group, which include association memberships and staff salaries both calculated in percentage of the time devoted to advocacy activities (perimeter: EU and France).**

ADVOCACY EXPENDITURES	FY 2016 & 2017
TOTAL (M EUR, cost range)	1 100 000 - 1 400 000