



## **Responsible lobbying Carrefour 2023**

The commitment of the Carrefour Group and its management bodies to responsible lobbying is based on four pillars: integrity and transparency, ethical principles, total political neutrality and ongoing dialogue with stakeholders.

Within the Carrefour Group, lobbying activities are the responsibility of the Group's General Secretary (COMEX member). This document applies to all employees of the Carrefour Group and more particularly to those who are required to act as interest representatives to public authorities. They formally undertake to carry out their activities with probity and integrity and to respect the following principles of transparency and ethics.

### **1. Compliance with legal obligations**

The Carrefour Group complies with the legal obligations applicable to interest representatives in liaison with the French High Authority for the Transparency of Public Life (HATVP). In addition, under the impetus of its Executive Committee, the Carrefour Group supports the promotion of transparency and integrity issues around responsible lobbying in the context of its activity. The Haute Autorité pour la Transparence de la Vie Publique (HATVP) defines interest representation or lobbying as the act of coming into contact with those responsible for drafting and voting on laws and leading the State's action (in ministries, in Parliament, but also in local administrations) in order to influence their decisions.

- The Carrefour Group complies with the legal obligations relating to the representation of interests, in particular those laid down by :
  - French Law 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, in particular Article 25 on the declaration of interest representation actions with French public officials on the digital directory of the Haute Autorité pour la Transparence de la Vie Publique (HATVP);
  - French law 2013-907 of 11 October 2013 on the transparency of public life;
  - the Decree of 9 May 2017 on the digital directory of interest representatives amending Article 18 of Law 2013-907 of 11 October 2013 on transparency in public life.
- Carrefour Group employees acting as interest representatives to public authorities are identified in a dedicated internal register that is regularly



updated and expressly state that they speak on behalf of the company during their institutional contacts.

- The Carrefour Group's interest representatives declare their influential communication actions with regard to public officials at national level to the Haute Autorité pour la Transparence de la Vie Publique (HATVP) on an annual basis.
- The Carrefour Group keeps a register of meetings between interest representatives and public officials.
- Employees who represent interests at national level must inform their superiors in the event of any actual or potential conflict of interest that could affect the relationship between the Carrefour Group and public decision-makers involved in public policy decision-making.
- The Carrefour Group complies with the obligations arising from the codes of conduct of the professional and trade organisations of which it is a member.
- The Carrefour Group promotes the adoption of best practice in lobbying within the professional associations in which it participates.
- The Carrefour Group is listed in the transparency register of the European institutions.
- Any person who is aware of situations or behaviour that contravene the Carrefour Group's ethical principles can report them in complete confidentiality 24 hours a day, 7 days a week via the alert channel <http://ethique.carrefour.com>. The Carrefour Group undertakes to handle all the reports it receives in accordance with the law.

## **2. Ethical principles and the fight against corruption**

- In its Ethical Principles, the Carrefour Group has defined a framework within which Group employees must carry out their professional activities on a daily basis. The fight against conflicts of interest, corruption and influence peddling are pillars of this ethical approach.
- The rules applicable to "Gifts and Invitations" adopted by the Carrefour Group are based on exemplarity, transparency and balance in the relationship with third parties.
- Any attempt to obtain information or decisions by using inappropriate pressure is prohibited.

## **3. Relations with public authorities**

The Carrefour Group interacts with the public authorities in the countries where it is present in compliance with local legislation. The Carrefour Group does not



make any contributions to political parties, politicians and related institutions or organisations raising political funds.

#### **4. Dialogue**

The Carrefour Group encourages dialogue with national and local public authorities, as well as with civil society stakeholders (trade unions, NGOs, citizens' associations, etc.). This dialogue is open and there are no strings attached to any action that may be taken.

The dialogue and lobbying activities carried out by the Group are described in the appendix to this document.

#### **APPENDIX: Table of the Carrefour Group's lobbying activities**

Carrefour openly declares its commercial interests and the amount of contributions paid by the Group.



	Consistency with the Paris Agreements	Governance function	Financing via a membership fee	Financing other than through contributions	Amount of funding
<b>European and worldwide recognition</b>					
<b>Global Compact</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>30 k€</b>
<b>Eurocommerce</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>63 k€</b>
<b>CGF</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<b>155 k€</b>
<b>Ellen Mac Arthur Foundation</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>40 k€</b>
<b>WWF</b>	<input type="checkbox"/>			<input type="checkbox"/>	<b>100 k€</b>
<b>FIDH</b>					<b>30 k€</b>
<b>National recognition</b>					
<b>Open Agrifood</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<b>40 k€</b>
<b>Perifem</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<b>34 k€</b>
<b>FCD</b>		<input type="checkbox"/>	<input type="checkbox"/>		<b>2 000 k€</b>
<b>AFEP</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>77 k€</b>
<b>France Logistique</b>			<input type="checkbox"/>		<b>10 k€</b>
<b>FEVAD</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>26 k€</b>
<b>ARPP</b>			<input type="checkbox"/>		<b>17 k€</b>
<b>UDM</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>57 k€ excl.</b>
<b>FACT (formerly CNCC)</b>	<input type="checkbox"/>		<input type="checkbox"/>		<b>1 k€</b>