

## ETHICS IMPULSE - THE RIGHT PROCEDURE

# RESPONSIBLE LOBBYING CHARTER

## GROUP ADP'S COMMITMENTS

The ADP Group is present in some thirty countries, mainly through its airport management activities.

Because of its presence in the territories, the group must maintain a constant dialogue with all stakeholders, and in particular with the authorities, both local and national.

This is why ADP Group is committed, at the highest level, to supporting the promotion of transparency and integrity issues around responsible lobbying. With this in mind,

ADP Group has signed the Joint Declaration of Transparency International France's member companies on lobbying.

This charter defines the commitments of all ADP Group employees and reaffirms the responsible nature of their lobbying practices.

### DECLARE YOURSELF/IDENTIFY YOURSELF

- ◆ Where they exist (e.g. in the European Commission), register with the institutions where lobbying is carried out and respect the codes of conduct and regulations of these institutions.
- ◆ For mandated persons/organisations, identify themselves and give the name of organisations for which they are lobbying (no shadow lobbying).

### PROHIBIT/ABSTAIN

- ◆ To refrain from recruiting or having on its workforce an employee who exercises management functions and who, regardless of his or her political opinions, holds a political mandate as a national or European parliamentarian.
- ◆ To refrain from recruiting or having on its workforce an employee performing managerial functions who, regardless of his or her political opinions, holds a position as a parliamentary assistant or ministerial adviser.
- ◆ To refrain from organising conferences or events where the speaking arrangements for public decision-makers are linked to the payment of compensation.
- ◆ To refrain from offering benefits, gifts, invitations or expenses with the sole purpose of influencing public decision-makers and compromising their impartiality.
- ◆ To refrain from any attempt to obtain information or decisions by illegal means.

### DISSEMINATE/PUBLICISE

- ◆ In accordance with the communication obligations required of listed companies, disseminate reliable, verifiable and up-to-date information or arguments, thus ensuring their traceability.
- ◆ To ensure financial transparency on the budget spent on lobbying and the budgets paid to public affairs firms.
- ◆ To make available the main positions communicated to public policy makers and possible contributions to political parties.

ETHICAL PROCEDURE - RESPONSIBLE LOBBYING CHARTER			V1
POSITION	EDITORIAL	APPROBATION	THIS PROCEDURE IS APPLICABLE STARTING FROM: <b>01/10/2022</b>
DIVISION	ETH	DDDA	
DATE	01/09/2022	27/09/2022	