

PSA GROUP ETHICS CHARTER FOR RESPONSIBLE LOBBYING

The PSA Group supports responsible lobbying that helps to inform public decisions on economic, social, scientific and cultural developments towards democratic, healthy and effective debate.

In order to regulate its practices and make them clear to our external contacts, the PSA Group has adopted this specific ethics charter, in addition to the existing [ethics charter](#) to which all employees are subject.

This applies to employees of the PSA Group who advocate interests before public authorities (governments, parliaments, administrations, local authorities, etc.). They formally undertake to carry out their activity with integrity and to respect the following principles of transparency and deontology:

1. Transparency

- The PSA Group respects the institutional rules governing influential practices and business relationships. It applies the most demanding international standards (OECD, ILO, Global Compact).
- It complies with the obligations arising from the codes of conduct of the trade and professional organizations of which it is a member.
- The employees of the PSA Group carrying out lobbying actions are identified and indicate that they are speaking on behalf of the company when meeting institutional contacts.
- The positions set out to institutional contacts are written in advance and arguments are sourced, updated and verifiable.
- The Group's key public positions that are asserted or defended are recorded.
- The list of professional associations, think tanks and other bodies to which the Group belongs or contributes is kept up to date.
- The main positions promoted or defended by the Group are consistent with the Group's sustainable development commitments and are published each year in the CSR (Corporate Social Responsibility) report. Hearings with parliamentary committees and bodies are specified.
- The PSA Group, listed on the Paris stock exchange, has signed the French and European registers of interest representatives, which are made public on the Internet in detailed forms.

Control of practices:

- *Coordination meetings are held between employees in charge of public affairs and the departments in charge of communication and CSR. Worldwide regions are represented in these meetings.*
- *The Public Affairs Department lobbying plan and the actions carried out are supervised by the Secretary General of PSA Group who is a member of the Executive Committee and reports directly to the Chairman of the Executive Board.*
- *Since 2016, the Secretary General of PSA Group is also responsible for the Group's Compliance Officers.*
- *The Public Affairs Director reports his actions twice a month to a management committee attended by the Group's Chief Legal Officer, who also serves as the Competition Compliance Officer.*
- *The lobbying positions of the PSA Group on the most engaging topics are decided with the approval of the Chairman of the Executive Board and debated in the Executive Committee.*

2. **Ethical values and the fight against corruption**

- The PSA Group is committed to the fight against bribery and corruption in all its forms, be it public or private, active or passive, direct or indirect, in accordance with the [anti-corruption provisions](#) it has adopted. The employees concerned by this charter are trained to respect the Group's ethical rules, in particular anti-corruption rules and compliance with competition law.
- No gift, invitation or advantage of significant value or such as to create a sense of obligation, can be offered or received.
- Any attempt to obtain information or decisions by using undue pressure is prohibited.
- The PSA Group may use public affairs consulting firms, which must respect responsible lobbying practices.

Control of practices:

- *Employees can raise suspicions of violations of ethical rules, which, if necessary, will be evaluated and dealt with by the Group's Ethics Committee.*
- *The Public Affairs Department can be controlled by the Group Department for Audit and Risk Management, which acts independently. This control is also carried out as part of the audit of how processes comply with the Group's internal control rules.*

3. **Political neutrality**

- The PSA Group works transparently with all public authorities in the countries where it operates, following ethical rules and applying political neutrality.
- The PSA Group does not make financial contributions to political parties.
- Any financial relationship with an elected official or a public service representative is prohibited.
- Employees engaged in lobbying activities refrain from holding any national or supra-national political office.

4. **Dialogue**

- The PSA Group fosters dialogue with national and local public authorities, as well as with non-governmental stakeholders (trade unions, NGOs, citizens' associations, etc.). This dialogue is open and has no quid pro quo.
- The PSA Group contributes to this dialogue by providing honest and reliable information based on its expertise.
- In a spirit of continuous improvement, the PSA Group supports the expansion of the circle of experts who can contribute to the debate, and does not hesitate to challenge their views in order to raise solutions in the public interest.

Employees of the PSA Group acting as interest representatives before the public authorities undertake to respect the principles of this charter and to submit it to their suppliers. They undertake to update it as necessary to comply with applicable law.

Paris, December 2016.