DOMAINES BARONS DE ROTHSCHILD
LAFITE

Lobbying Policy
DBR Lafite Group

Updated October 2026

1. Purpose

The purpose of this Policy is to regulate all interest representation activities carried out by the Domaines Barons de Rothschild Lafite Group (hereinafter the DBR Lafite Group) with public officials, in compliance with Articles 18-1 et seq. of Law No. 2013-907 of 11 October 2013 on transparency in public life, as introduced by Law No. 2016-1691 of 9 December 2016 known as the "Sapin 2 Law", and with the recommendations of the High Authority for Transparency in Public Life (HATVP).

This policy sets out, in summary form, the rules applicable to the DBR Lafite Group's interest representation activities and supplements the Anti-Corruption Code of Conduct.

2. Scope

This Policy applies:

- to interest representation activities carried out with French public officials;

- and to interest representation efforts directed at European Union institutions or at public officials of other States, subject to any adaptations necessary to comply with mandatory local rules. In the event of a discrepancy between this Policy and a mandatory local rule, the latter prevails. Any doubt as to the geographical scope or the applicable regime must be brought without delay to the attention of the Compliance Officer.

Any employee in contact with public officials must comply with both this policy and the DBR Lafite Group's Anti-Corruption Code of Conduct.

The term "employees" covers all employees and executives of the DBR Lafite Group, that is, all persons working within the Group, regardless of their position in the hierarchy, seniority or place of work.
Only employees expressly authorised by General Management may carry out interest representation activities on behalf of the DBR Lafite Group.

3. Definitions

Interest representation, commonly known as lobbying, means the act of communicating with a public official with the aim of influencing a public decision.

Any action by which an employee of the DBR Lafite Group communicates with one or more public officials with a view to influencing a public decision, in particular the content of a law, a regulatory act or a public policy direction, is considered an interest representation activity.
Exchanges initiated by the public official do not constitute interest representation actions within the meaning of the law; the rules of conduct in section 5 nevertheless apply to them.

Examples of interest representation activities:

- a meeting requested with a member of the National Assembly or a senator to propose or comment on an amendment to a bill;

- a meeting requested with the mayor of a municipality of more than 20,000 inhabitants to influence a funding decision;

Within the DBR Lafite Group, an employee carrying out an interest representation activity is any employee who, on behalf of the DBR Lafite Group, has as their main or regular activity the influencing of public decisions by communicating, on their own initiative, with one or more public officials in order to defend specific interests.
In accordance with Decree No. 2017-867 of 9 May 2017, the activity is main when the employee devotes more than half of their time, over a six-month period, to preparing, organising or carrying out interest representation actions, and regular when they communicate, on their own initiative, with public officials at least ten times in the previous twelve months. As soon as either of these criteria is met by one of its employees, the relevant DBR Lafite Group company is required to register in the HATVP directory.

Public officials are persons falling within the categories set out in Law No. 2013-907 of 11 October 2013 and Decree No. 2017-867 of 9 May 2017 (members of the Government and their private offices, staff of the President of the Republic, members of Parliament and their staff, members and executives of independent administrative or public authorities, holders of local executive office and certain delegated local elected officials, as well as any person so classified by the legislation and the lists published by the HATVP).

4. Transparency

Where the legal criteria for being an interest representative are met, the DBR Lafite Group:
- registers in the public directory of interest representatives maintained by the High Authority for Transparency in Public Life (HATVP);
- submits and updates the required information (executives, persons in charge of lobbying, fields of intervention, professional memberships);
- files the annual declaration of interest representation actions and the resources devoted to them, within three months of the close of the financial year.

The Compliance Officer may coordinate these steps and may request additional information from the employees concerned; they are required to respond accurately and within the deadlines.

5. Rules of conduct applicable to employees

Any employee who contacts a public official on behalf of the DBR Lafite Group must comply with the following principles:

- **Transparency of identity and of the interests represented**

✓ Introduce oneself clearly (name, position, Group entity) and state that one is acting on behalf of the DBR Lafite Group or, where applicable, on behalf of a professional organisation to which the DBR Lafite Group belongs.

✓ State the general nature of the interests represented.

- **Fairness and accuracy of information**

✓ Provide only accurate, complete, verifiable and fair information.

✓ Correct without delay any inaccurate information previously given to a public official.

× Refrain from any misleading presentation or deliberate omission of essential elements.

- **Strict control of gifts, invitations and benefits**

✓ Comply with the rules of the Anti-Corruption Code of Conduct on gifts, invitations, donations and hospitality.

× Any benefit (gift, invitation, etc.) that could be perceived as consideration for a decision or a favourable position is prohibited.

Any employee must consult the Compliance Officer if in doubt about the lawfulness or appropriateness of a contemplated gift, invitation or benefit.

- **Prohibition of unlawful or circumvention practices**

× Any form of corruption, influence peddling, pressure, threat or promise of an undue advantage is prohibited.

× Recourse to intermediaries or informal channels in order to conceal the real origin of an approach or to evade transparency obligations is prohibited.

In accordance with Article 18-5 of Law No. 2013-907 of 11 October 2013, it is also prohibited to: offer or give public officials gifts, donations or benefits of significant value; induce a public official to breach the ethical rules applicable to them; obtain or attempt to obtain information or decisions by fraudulent means, or by deliberately communicating inaccurate information; organise conferences, events or meetings in which public officials' participation as speakers is linked to the payment of remuneration; disclose for commercial or advertising purposes information obtained from public officials; sell to third parties copies of documents originating from public authorities or use their letterhead or logo without authorisation.

- **Prevention of conflicts of interest**

× Do not approach a public official when in a personal situation that could call one's impartiality into question (financial interests, family ties, mandates, etc.).

× Report any potential conflict of interest situation to the Compliance Officer or through the internal whistleblowing system (Whispli platform).

6. Intermediaries and professional organisations

When it uses intermediaries (consultancies, consultants, lawyers, communication agencies, etc.) or professional organisations (federations, associations, unions, inter-professional bodies, etc.) that may carry out interest representation actions on its behalf, the DBR Lafite Group ensures that these third parties comply with transparency and ethical requirements at least equivalent to those set by this Policy.

Any contract entered into with an intermediary or professional organisation likely to carry out interest representation actions on behalf of the DBR Lafite Group must contain, at a minimum, the following commitments:

- Compliance with the legal and ethical obligations applicable to interest representatives, including those arising from the Sapin 2 Law and HATVP texts.

- Obligation to provide the DBR Lafite Group, within timeframes compatible with reporting requirements, with all information necessary for registration and for the annual declaration of interest representation actions.

- Where the intermediary itself meets the criteria of an interest representative, obligation to register in the HATVP directory and to comply with all corresponding reporting and ethical obligations.

7. Whistleblowing, Monitoring and Sanctions

Any employee who observes or suspects a breach of this Policy, or more generally of the regulations applicable to interest representatives, must without delay use the DBR Lafite Group's internal whistleblowing system (Whispli platform), which guarantees the confidentiality of their identity and their protection against any retaliatory measures.

Any breach of this policy may result in internal disciplinary sanctions, without prejudice to the criminal penalties provided for by law.



Approved by General Management