

MERCIALYS

Responsible lobbying guidelines

These guidelines apply to Mercialys and all of its subsidiaries and employees.

Lobbying refers to any influence or information action initiated by a representative of the Group's interests with a public official seeking to direct a public decision concerning either Mercialys directly or the sector in which it operates. Lobbying may involve providing public decision-makers with technical elements regarding the impacts of decisions relating to current or planned legislation or regulations, or to initiate reviews into the need for legislation in certain areas.

At local level, lobbying may involve providing information relating to the operation or constructability of sites operated by Mercialys.

Principles to be applied within the Mercialys Group

Mercialys applies a general principle of political neutrality and sets out commitments, at the highest level, to providing support for promoting transparency and integrity issues for responsible lobbying. Influence activities are carried out without awarding any material benefit or value, with the exception of proportionate hospitality arrangements. Under all circumstances, Mercialys refrains from engaging in any form of corruption, whether active or passive.

The Company advocates consistent positions in line with its overall Corporate Social Responsibility policy, as described in the Universal Registration Document. More specifically, one of this policy's three core pillars is respect for stakeholders. Illustrating this, Mercialys structures its dialogue with public officials around technical elements or objective feedback from its tenant or visitor base in order to clarify decision-making without seeking to obtain information or decisions by exerting any pressure whatsoever.

These commitments are intended to help ensure the sustainability and solidity of Mercialys' activities, while protecting the Company against potential risks to its development and reputation.

Mercialys' organization

Lobbying activities are overseen by the Head of Development and Institutional Relations, who ensures that the influence strategy is implemented without resulting in conflicts of interest. The Head of Development and Institutional Relations and the employees that this person may work with perform this activity in a strictly professional context and never under any circumstances for personal reasons.

These actions are carried out at all times with respect for the ethical principles set out in the [Code of Ethics](#), such as the prevention of corruption and conflicts of interest, notably respecting the principles of integrity, transparency and fairness regarding access to information, communicated on an objective and verifiable basis.

More generally, Mercialys, which has signed up to the United Nations Global Compact, is deeply committed to a socially responsible approach, including respect for the principles relating to human rights, international labor standards, the environment and anticorruption. It is committed to making

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progress each year in each of these areas. Lobbying actions are naturally integrated within these approaches.

If Mercialys was to use, at local and/or national level, the services of external lobbyists, all of these guidelines would apply to them in full.

Moreover, Mercialys has a duty to formally ensure that the firms appointed:

- comply with all the requirements set by regulations governing the transparency of public life;
- provide it with detailed reports on all the actions taken on its behalf.

No actions are taken in any way whatsoever to obtain information or decisions by illegal means.

The Company is a member or partner of various professional organizations or organizations that are close to its operating sector that carry out lobbying actions. These associations convey messages on an official basis and contribute to the transparency of Mercialys' target positions.

Mercialys' commitments

All lobbying-related actions are recorded in accordance with legal and regulatory requirements and are monitored, enabling registration, when applicable, in the directory kept by the French High Authority For Transparency In Public Life (HATVP) based on the following provisions:

- French Law 2013-907 of October 11, 2013 relating to the transparency of public life: <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000028056315>
- French Law 2016-1691 of December 9, 2016 relating to transparency, anticorruption and the modernization of economic life, and specifically Article 25 relating to the declaration of actions representing interests with French public officials in the digital directory of the French High Authority For Transparency In Public Life (HATVP): <https://www.legifrance.gouv.fr/eli/loi/2016/12/9/2016-1691/jo/texte>
- French Decree of May 9, 2017 relating to the digital directory of representatives of interests amending Article 18 of Law 2013-907 of October 11, 2013 relating to the transparency of public life: <https://www.legifrance.gouv.fr/eli/decret/2017/5/9/ECFM1706418D/jo/texte>

Dialogue and consultation with regional officials may be carried out under guidelines for partnerships covering economic, social, environmental and societal aspects. Such agreements are systematically submitted for approval by the Group's Ethics Department.

Mercialys, a listed company, ensures that its information reporting is reliable, clear and transparent.