

*Responsible  
Lobbying*  
Charter

LVMH

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## Introduction

The LVMH group (“LVMH” or the “Group”) takes part in public policy discussions in a spirit of constructive dialogue and cooperation with the stakeholders concerned, including but not only political leaders and the institutions responsible for decision-making.

The Group’s involvement in the public sphere is in line with its ethical approach as set out in the [LVMH Code of Conduct](#), which contains the rules and principles that all employees must follow when performing their duties.

Following on from the Code of Conduct and the [Anti-Corruption Charter](#), the LVMH Responsible Lobbying Charter (the “Charter”) sets out the rules and principles to be observed by employees and executives of the Group and its Maisons when participating in public policy discussions.

## 1. Scope

This Charter applies to all activities carried out directly or indirectly by employees and executives of the Group and the Maisons in order to contribute to the development of public policies and decision-making process through various forms of advocacy activities, in the jurisdictions in which the Group and its Maisons operate<sup>1</sup>.

Service providers involved in advocacy activities on behalf of LVMH or one of its Maisons are required to comply with the principles set forth in this Charter and in the [LVMH Supplier and Business Partner Code of Conduct](#).

## 2. The Group's Commitments To Responsible Lobbying

Compliance with laws and regulations is key to the Group's credibility when participating in public discussions.

Moreover, the key principles of integrity, transparency, and accuracy must guide the Group's participation in the public sphere.

### 2.1 Integrity

- LVMH is committed to the highest standards of integrity, responsibility and respect in the conduct of its advocacy activities. LVMH demands exemplary behavior from each employee and external service provider.
- As stated in its Anti-Corruption Charter, LVMH has a "zero tolerance" policy with respect to corruption and influence peddling anywhere in the world. This Charter sets out the different types of conduct prohibited in relationships with concerned stakeholders.
- The Group is committed to avoiding any situation that could lead to a conflict of interest in its lobbying activities. Conflicts of interest, whether potential or real, must be reported, in accordance with the Group's Anti-Corruption Charter and the Maisons' internal policies.
- LVMH prohibits the remuneration and recruitment, whether permanent or temporary, of any member of a national or European parliament, for the duration of their elective mandate. Any recruitment or employment of a former public official must comply strictly with applicable laws and regulations, particularly with regard to confidentiality and potential conflicts of interest.
- Facilitation payments are strictly prohibited, regardless of the reason for them, their amount, or the country in which they are solicited.
- Gifts and invitations must be made in strict compliance with applicable laws and regulations, and in accordance with the Group's Anti-Corruption Charter and the internal policies of the Maisons.

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<sup>1</sup>The [Society of European Public Affairs Professionals](#) (SEAP) defines "lobbying" as "every activity carried out with the objective of directly or indirectly influencing the formulation or implementation of the policy and decision-making process regarding legislative or regulatory activities".

## 2.2 Transparency

- LVMH's lobbying activities must be conducted in compliance with the highest standards of ethics and transparency. LVMH is registered as an "interest representative" (lobbyist) whenever its business requires, in accordance with applicable regulations in the jurisdictions in which LVMH and its Maisons' operate.
- In meetings and interactions with relevant stakeholders, including but not limited to public officials, LVMH employees and external service providers are required to openly declare the Group's interests.
- LVMH respects the right of its employees to participate in political or union activities in a private capacity. However, employees undertake to ensure that their activities in the private sphere do not involve or compromise the performance of their duties or damage the Group's reputation.
- LVMH prohibits the payment of money to political parties, candidates, election campaign funds, or any other organization, person, fund, or trust for the purpose, in whole or part, of promoting the candidacy of one or more persons running for elective office. LVMH respects the right of its employees to contribute their own funds, in their own name, for political purposes.

## 2.3 Accuracy

- The Group attaches great importance to the reliability of information communicated to its interlocutors. It ensures that the financial and non-financial information it provides is accurate and provided within the appropriate time, in accordance with applicable law and the Code of Conduct.
- Information communicated by LVMH as part of its lobbying activities must be accurate, factual, and up-to-date. External service providers used by the Group's and its Maisons must comply with the same principles
- Disclosure of lobbying activities must be carefully balanced with the need to preserve confidentiality in the public interest and to protect LVMH's market-sensitive information as well as rights to privacy and data protection. Discretion is essential to maintaining trust within the Group and in the relationships established with policy-makers.
- Employees and external service providers are required to respect the confidentiality of information gathered and provided as part of their advocacy activities. Communication relating to advocacy activities must take into account the protection of all confidential information, in particular the Group's commercially sensitive information, as well as privacy and data protection rights.

## 3. Implementation

### 3.1 Governance

To ensure that a strong ethical culture is disseminated as widely as possible, LVMH has set up a dedicated governance structure, as set out in the Code of Conduct and Anti-Corruption Charter.

### 3.2 Distribution, training, and application

This Charter is distributed to all Maisons and Group entities. It is also available on the LVMH website and the Group's intranet.

LVMH provides regular training to employees involved in lobbying about the regulatory requirements and reporting obligations governing such activities, in each jurisdiction in which LVMH and its Maisons operate. Training is provided by internal Group teams, or by specialized external consultants.

As set out in the Code of Conduct and the Anti-Corruption Charter, to which this Charter refers, if there is a violation of the provisions of these two documents, employees may be subject to disciplinary measures and sanctions proportionate to the seriousness of their actions. Such sanctions may include dismissal, without prejudice to possible legal action.

### 3.3 Alert system

LVMH promotes a culture of dialogue and communication within the Group.

Any employee who is facing a situation likely to constitute a violation of applicable laws or regulations, or the principles set forth in the codes, charters, and policies of the Group or its Maisons, is encouraged to report the situation without delay to Human Resources or to their Ethics & Compliance Correspondent.

In addition to these usual channels, LVMH has set up a centralized, secure alert system that guarantees confidentiality: the [LVMH Alert Line](#). This online platform can be accessed on the Group's website or at <https://alertline.lvmh.com>. It is open to all employees and external stakeholders.

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