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Public Policy on Responsible Lobbying and Public Affairs

Policy Statement

At Lightrise, we believe that responsible business includes participating constructively in public policy discussions that advance social, environmental and economic wellbeing. As a purpose-led organisation committed to B Corp values, we recognise that lobbying and advocacy activities carry both influence and responsibility.

We are committed to ensuring that all lobbying, advocacy and public policy engagement:

- Advances the long-term public interest.
- Supports evidence-based policymaking.
- Promotes social and environmental sustainability.
- Respects human rights and democratic processes.
- Is conducted transparently, ethically and accountably.
- Aligns with our mission, values and public commitments.

This policy applies to all employees, directors, contractors, consultants, trade associations, intermediaries and third parties acting on behalf of the organisation.

As a Microsoft Solutions Partner and technology consultancy, Lightrise's public policy engagement focuses on areas aligned with our purpose and values, including digital skills, responsible technology adoption, accessibility, sustainability, inclusion, social value, and the ethical use of emerging technologies.

We seek to contribute positively to policy discussions that support both societal benefit and responsible innovation.

Purpose

The purpose of this policy is to:

- Establish standards for responsible lobbying and advocacy.
- Ensure alignment between our public policy positions and our mission.
- Protect the integrity of democratic institutions.



- Promote transparency regarding our influence on public policy.
- Meet and exceed the expectations of stakeholders, including customers, employees, communities, investors and regulators.

Definition of Lobbying

For this policy, lobbying includes any direct or indirect communication with public officials, elected representatives, regulators or government bodies intended to influence public policy, legislation, regulation, standards or public decision-making. This includes:

- Direct meetings with policymakers.
- Consultation responses.
- Industry and trade association engagement.
- Sponsored research intended to inform policy.
- Public campaigns designed to influence policy outcomes.
- Public affairs consultancy activities conducted on our behalf.

Consistent with the Responsible Lobbying Framework, we make no distinction between advocacy and lobbying based on the perceived merit of a cause; instead, we determine responsible conduct by the process used.

Guiding Principles

Principle 1: Legitimacy

We will engage in lobbying only when we can demonstrate that our positions contribute to a broader public benefit and not solely commercial advantage.

Accordingly, we will:

- Consider impacts on people, communities and the environment.
- Support evidence-based policymaking and credible scientific research.
- Respect internationally recognised human rights.
- Avoid lobbying activities that undermine public policy objectives related to sustainability, equality, human rights, inclusion or climate action.
- Avoid political influence that could create actual or perceived conflicts of interest.
- Maintain robust anti-bribery and anti-corruption controls.
- Implement controls governing gifts, hospitality and financial incentives.
- Manage "revolving door" risks relating to former public officials and elected representatives.



Principle 2: Transparency

We are committed to being open and truthful regarding any lobbying, advocacy or public policy engagement activities we undertake.

Where material lobbying or public policy engagement report, or other appropriate public channels.

Such disclosures may include:

- Key public policy issues on which we engage.
- Relevant legislation, regulations or policy initiatives.
- Membership of trade associations and representative organisations.
- Any material lobbying expenditure, public affairs consultancy engagements or political contributions.
- This policy and related governance arrangements.

This information will be disclosed in a manner proportionate to the scale and nature of our activities.

Principle 3: Consistency

Our lobbying positions must be consistent with:

- Our mission and purpose.
- Our B Corp commitments.
- Published sustainability goals.
- ESG commitments.
- Human rights commitments.
- Climate and environmental objectives.
- Diversity, equity and inclusion objectives.

To achieve this:

- We will regularly review positions held by trade associations and industry bodies of which we are members.
- Where material misalignment exists, we will seek change through engagement.
- If alignment cannot be achieved, we will consider reducing support, issuing public clarifications or ending membership.
- Third parties representing us must comply with this policy and our Code of Conduct.



Principle 4: Accountability

The Board retains ultimate accountability for responsible lobbying.

Board Responsibilities

The Board shall:

- Approve this policy.
- Review significant public policy positions.
- Monitor lobbying-related risks.
- Oversee compliance with this policy.

Management Responsibilities

Management shall:

- Maintain lobbying registers and records.
- Ensure compliance by employees and representatives.
- Conduct training where appropriate.
- Monitor memberships and third-party relationships.

Stakeholder Engagement

We recognise that responsible lobbying should reflect stakeholder interests.

Accordingly, we will:

- Consider stakeholder perspectives when developing policy positions.
- Engage affected groups where practical and appropriate.
- Welcome transparent dialogue with stakeholders regarding our public policy priorities.

Whistleblowing

Employees and representatives may raise concerns regarding lobbying conduct through our whistleblowing process without fear of retaliation.

Assurance

We will periodically review lobbying disclosures, activities and governance controls to ensure compliance and continual improvement.



Principle 5: Opportunity and Collaboration

We believe public policy outcomes are strengthened when diverse voices participate.

We therefore commit to:

- Supporting fair democratic participation.
- Avoiding activities intended to suppress or crowd out alternative viewpoints.
- Collaborating with civil society organisations, social enterprises and responsible businesses where interests align.
- Supporting initiatives that improve transparency and integrity in public policymaking.
- Encouraging higher standards of responsible lobbying across our sector.

Political Contributions

As a general principle, we do not make political donations.

Where permitted by law and considered necessary to support democratic participation:

- Any political contribution must be pre-approved by the Board.
- Contributions must be transparent and publicly disclosed.
- Contributions must never seek preferential treatment or influence.
- Contributions must comply with all applicable laws and regulations.

Consistent with B Corp principles, we favour evidence-based policy engagement, collaboration, and transparency rather than financial influence.

Monitoring and Reporting

Each year we will review:

- Lobbying activities undertaken.
- Public policy priorities.
- Trade association alignment.
- Compliance with this policy.
- Stakeholder feedback.
- Opportunities for improvement.



Where material lobbying or public policy engagement activities occur, we may publish a summary of our governance and activities through our website, annual impact report, sustainability report, or other appropriate public disclosure.

Commitment: As an organisation committed to creating positive impact for all stakeholders, we recognise that responsible lobbying is an important element of ethical business conduct. We will engage with policymakers transparently, ethically and constructively, always seeking outcomes that support both organisational objectives and the wider public interest.

Reference Framework

This policy is informed by the Responsible Lobbying Framework (2020), developed by Simon Hodgson and Daniel Witte of Carnstone Partners Ltd. It reflects its five principles: Legitimacy, Transparency, Consistency, Accountability, and Opportunity. It reflects its five principles: Legitimacy, Transparency, Consistency, Accountability, and Opportunity. This policy is intended for publication on the Lightrise website and may be included within impact reporting, sustainability disclosures and governance documentation.