



AGC Responsible Lobbying Policy

Purpose

AGC are committed to conducting its business with integrity, transparency, and in alignment with its mission to create positive social and environmental impact. This policy ensures that any lobbying or public policy engagement activities are consistent with B Corp standards, applicable laws, and our ethical commitments.

Scope

This policy applies to all employees, partners, officers, and directors of AGC. It also covers any third parties acting on our behalf, including consultants, trade associations, and contractors.

Definition of Lobbying

Lobbying includes:

- Direct communication with government officials to influence legislation or policy.
- Participation in trade associations or advocacy groups that engage in lobbying.
- Indirect lobbying, such as public campaigns or position statements.
- It does not include routine compliance communications or nonpartisan educational activities.

Guiding Principles

Our approach to lobbying is guided by:

- **Mission Alignment:** We lobby only to contribute to a positive impact on society or the environment.
- **Evidence-Based Advocacy:** All lobbying positions are based on reliable and/or scientific data.
- **Ethical Conduct:** All activities must be conducted honestly and in compliance with the law.
- **Transparency:** Lobbying positions and expenditures will be documented and disclosed.
- **Partisanship:** We do not support political candidates or parties. We may oppose those promoting disinformation or hate. We are pro-democracy, anti-fascist, and anti-racist.

Permitted Activities

AGC may engage in limited lobbying that:

- Supports fair and sustainable business practices.
- Promotes policies benefiting communities and the public interest.
- Advances environmental sustainability and social equity.
- All activities require prior approval from the Director.

Prohibited Activities and Anti-Corruption

AGC strictly prohibits:

- **Political Contributions:** We do not make financial or in-kind political contributions on behalf of the company.
- **Anti-Corruption & Bribery:** We maintain a zero-tolerance approach to corruption and bribery. We will not offer or accept improper payments to influence policy.
- **Misalignment:** We do not engage in lobbying that contradicts our mission or B Corp commitments.
- **Unethical Conduct:** We avoid any activity perceived as misleading or coercive.

Intermediary Organizations and Third Parties

When participating in trade associations or industry groups:

- We evaluate alignment between the association's positions and our mission.
- We maintain controls to ensure these organisations act consistently with this policy.
- Material misalignment will be addressed through internal advocacy or reconsideration of membership.
- Records of memberships and dues will be maintained.

Governance, Risk, and Compliance

- Accountability: **The Director** (the highest governing body) is accountable for enforcing this policy and approving all activities.
- Risk Management: We identify and monitor risks of non-compliance by reviewing all advocacy and third-party partnerships annually.
- Evaluation: We evaluate the effectiveness of our governance and control framework during the annual policy review.
- Recordkeeping: All lobbying expenditures and activities are tracked and documented in accordance with UK law.

Raising Concerns (Grievance Procedure)

- Employees are encouraged to raise concerns without fear of retaliation.
- Stakeholders can report concerns regarding our business conduct or lobbying practices via our Grievance Procedure (<https://www.surveymonkey.com/r/2CH75GM>)

Review and Publication

- This policy is approved by the **Director**.
- It will be reviewed at least annually.
- This policy is published on our website and is accessible to all stakeholders.