



Responsible Lobbying and Public Policy Engagement Policy

1. Purpose

This policy sets out how Clean Slate (UK) Ltd (“Clean Slate”) engages with government, regulators and the wider public policy process. It explains our current position, the principles we will follow if we choose to engage in the future, and how that engagement is approved, recorded and disclosed.

The policy supports our purpose and stakeholder governance statement and forms part of our commitment to B Corp principles.

2. Scope

This policy applies to the Directors, all employees, and anyone acting on Clean Slate’s behalf, including agents, advisers and consultants. It covers engagement with UK central government, the devolved administrations, local authorities, regulators, elected representatives, political parties and their officials.

3. What we mean by lobbying

In this policy, **lobbying** means any activity intended to influence the development, amendment or implementation of legislation, regulation, public policy or public spending decisions. This includes:

- direct contact with ministers, elected representatives or public officials for that purpose;
- written or oral responses to public consultations and calls for evidence;
- public campaigns aimed at changing policy; and
- activity carried out on our behalf by trade associations, membership bodies or consultants.

Our normal commercial dealings with public-sector clients – such as tendering, contract management and service reviews – are not lobbying for the purposes of this policy. They remain subject to the relevant procurement rules and to our obligations under the Bribery Act 2010.

4. Our current position

At the date of this policy, Clean Slate:

- does not carry out lobbying activity;

- does not employ or engage lobbyists or public affairs consultants; and
- makes no financial or in-kind contributions to political parties, candidates or campaigns.

We are a member of the East Midlands Chamber, which may from time to time engage with government on behalf of its members.

5. Principles we will follow

If Clean Slate engages in lobbying or public policy activity in the future, whether directly or through others, we will:

- do so only to advance positive social or environmental outcomes, consistent with our purpose, and never to weaken protections for workers, communities or the environment;
- provide information that is honest, accurate and not misleading;
- keep our public positions consistent with the positions we take in private;
- be open about who we are and whose interests we represent;
- never offer or give anything of value to a public official or elected representative to influence a decision; and
- comply with all applicable law, including the Bribery Act 2010, Part 14 of the Companies Act 2006 and the Political Parties, Elections and Referendums Act 2000. If we ever engaged a consultant to lobby on our behalf, we would use only a consultant registered under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, where registration is required.

6. Political contributions

Clean Slate does not make financial or in-kind contributions to political parties, candidates, elected representatives or political campaigns. Any proposal to change this would require:

- the prior written approval of the Managing Director;
- shareholder authorisation wherever Part 14 of the Companies Act 2006 requires it; and
- public disclosure in line with section 9 of this policy.

Employees are free to take part in political activity in a personal capacity. They must do so in their own time, must not use company resources, and must not suggest that they speak for Clean Slate.

7. Trade and membership bodies

We keep an up-to-date list of the trade and membership bodies we belong to. At least once a year we will review whether their public policy positions are consistent with our purpose. If a body we belong to takes a position that materially conflicts with our purpose, we will raise this with them and consider whether to disclose the difference publicly or end our membership.

8. Governance and approval

The Managing Director is responsible for this policy and for overseeing any lobbying or public policy activity carried out in Clean Slate's name.

No one may carry out lobbying or submit a consultation response on behalf of Clean Slate without the Managing Director's prior approval. A copy of every approved submission will be kept on file, together with the date, the recipient and a short summary of our position and the outcome we sought.

9. Transparency and reporting

Each year we will publish a short statement on our website summarising:

- any lobbying activity undertaken, including consultation responses;
- any political contributions made (or confirming that none were made); and
- the trade and membership bodies we belong to, noting any material difference between their positions and ours.

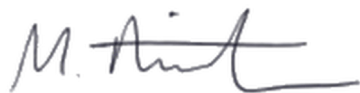
10. Raising concerns

Anyone – inside or outside the business – who is concerned that Clean Slate is not following this policy can raise it through our published grievance procedure. Employees may also use our whistleblowing arrangements.

11. Review

This policy is dated September 2026 and will be reviewed by the Directors at least annually, and in any event by September 2027.

Approved by:

A handwritten signature in blue ink, appearing to read 'M. Armitage', with a long horizontal stroke extending to the right.

Mike Armitage, Managing Director

Date: 28 September 2026