Responsible Lobbying Policy

1. Purpose of This Policy

Key Production Group ("the Company") is committed to ensuring that all lobbying and public policy engagement contributes positively to society and the environment. This policy sets out our principles, governance, controls, and transparency commitments for responsible lobbying across all our business units and intermediary relationships.

2. Our Commitment to Responsible Lobbying

2.1 Positive Impact

The Company will lobby only in ways that advance positive outcomes for society or the environment.
Our understanding of "positive impact" is guided by:

- Relevant outcome sections of B Corp's B Lab Standards, and
- The UN Sustainable Development Goals (SDGs).

We will not engage in lobbying that conflicts with our purpose or undermines environmental or social progress.

2.2 Evidence and Data Standards

All lobbying positions must be informed by:

- Reliable data (evidence-based, replicable, and independent), and/or
- Scientific data published in reputable peer-reviewed journals.

2.3 Political Contributions

The Company does not provide direct financial or in-kind political donations to political parties, candidates, or partisan organisations.
If any political contributions are considered in the future, they must be pre-approved by our highest governing body and publicly disclosed.

2.4 Anti-Corruption and Bribery

The Company maintains a zero-tolerance approach to bribery and corruption.
All employees and representatives must comply with the Company's Anti-Bribery & Corruption Policy and applicable laws.

2.5 Working with Intermediary Organisations

The Company may participate in trade associations, industry groups, or NGOs ("intermediaries"). Where such organisations take lobbying positions that differ from or conflict with this policy:
We will publicly disclose:

1. The Company's own position versus the intermediary's position
2. How we are engaging to positively influence the intermediary
3. Our defined red lines, i.e., circumstances under which we will discontinue membership or engagement.

Internal controls to ensure alignment include:

- Annual reviews of intermediary organisations' stated policy positions
- Documentation of any intermediary lobbying activities we participate in

2.6 Governance Approval

This policy is formally reviewed and approved by the Company's Board of Directors. Review frequency: at least once every two years, or earlier if material changes occur.

3. Governance, Controls & Risk Management

3.1 Accountability

The executive-level role accountable for enforcing this policy is the Director of Sustainability and Strategic Planning. This position reports regularly to the Company's Executive Team and Board.

3.2 Embedding the Policy

The policy is embedded in the Company through:

3.2.1. Employee Training for Individuals Involved in External Engagement

The Company provides briefing and awareness sessions for any employees involved in in political or regulatory forums.
These sessions cover:

- the Responsible Lobbying Policy;
- how to identify lobbying activity;
- expectations for responsible representation of the Company;
- procedures for escalation or pre-approval.

The training is short, internal, and proportionate to the Company's limited lobbying activity.

3.2.2. Mandatory Pre-Approval Procedures for Lobbying Activities

All lobbying - direct or through intermediaries - requires pre-approval from the CEO and Director of Sustainability & Strategic Planning.
Employees must notify the above before:

- expressing a Company position on public policy

- joining any coalition, working group, or campaign with a lobbying component
- signing public letters or consultations
- representing the Company in political or regulatory forums

No employee may speak on behalf of the Company in a lobbying context without explicit pre-approval.

3.2.3. Inclusion of Compliance Checks in Relevant Business Processes

Compliance checks are integrated into existing governance and sustainability processes. These checks include:

- annual review of all intermediary organisations
- assessment of alignment with the Responsible Lobbying Policy
- review of any new partnerships or industry memberships
- review of the lobbying register by the Director of Sustainability & Strategic Planning

These checks ensure that lobbying activities remain aligned with the Company's sustainability objectives and positive-impact purpose.

3.2.4. Integration With the Company's Sustainability Strategy and Code of Conduct

The Responsible Lobbying Policy is embedded within the Company's overall Sustainability Strategy and Code of Conduct.

- Lobbying positions must support the Company's environmental and social commitments.
- Participation in coalitions or initiatives must align with the Company's sustainability goals and B Corp principles.
- Employees representing the Company must comply with ethical standards outlined in the Code of Conduct.

This integration ensures that public policy activities reinforce the Company's long-term strategy and values.

3.3 Identification and Management of Non-Compliance Risks

The Company identifies and manages non-compliance risks by:

- Maintaining a register of all lobbying engagements
- Reviewing intermediary positions for alignment with this policy
- Conducting annual compliance audits
- Applying corrective actions if misalignment or misconduct occurs

3.4 Evaluation of Governance Controls

Compliance with this policy and its control framework is evaluated through:

- Internal audits
- Reporting to the Board on lobbying activity and alignment
- External reviews as part of B Corp recertification processes

3.5 Stakeholder Concerns and Grievance Procedure

Stakeholders can raise concerns about the Company's lobbying practices via our formal Grievance Procedure, available here:
https://www.keyproduction.co.uk/legal/#stakeholder-grievance-procedure
Complaints can be submitted anonymously and without fear of retaliation.

4. Transparency & Publication

4.1 Governance Approval

This Responsible Lobbying Policy has been reviewed and approved by the highest governing body of the Company.

4.2 Public Availability

The policy is published on the Company's public website and easily accessible to all stakeholders:
https://www.keyproduction.co.uk/legal/#responsible-lobbying -policy

5. Alignment Statement

5.1 Assessment Summary:

Key Production Group has reviewed the stated objectives and policy positions of all intermediary organisations with which it is engaged. Our analysis demonstrates that these organisations' lobbying and advocacy activities either:

- promote positive social or environmental outcomes, or
- focus on constructive industry standards without conflicting with our Responsible Lobbying Policy.
- Organisations such as the Better Business Act Coalition, Music Declares Emergency, the Music Climate Pact, AIM, Vinyl Alliance, and many artist-support bodies actively advance sustainability, climate action, improved working conditions, or responsible business governance.
- Trade associations with broader mandates (e.g., BPI, MMF, FAC) are monitored for potential divergence; however, their current public positions do not conflict with our sustainability goals.

5.2 Conclusion:

None of our intermediary organisations engage in lobbying activities that breach this policy. Where positions may evolve, Key Production Group will publish:

1. our own position;
2. how we seek to positively influence intermediary organisations; and
3. our red-line criteria for continued membership.

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6. Definitions

- Lobbying: Any attempt to influence public policy, legislation, or regulation.
- Intermediary Organisations: Trade associations, coalitions, or NGOs that may lobby on behalf of members.

Approved by the Key Production Executive Board May 2026