

THE FENDALE GROUP

LOBBYING & RESPONSIBLE ADVOCACY POLICY

Our position: influence should create positive impact — not private advantage.

1. Purpose

At The Fendale Group, we believe businesses should use their voice responsibly. There may be occasions where we engage with industry bodies, local authorities, policymakers, suppliers or community stakeholders to share perspectives on matters that affect our people, guests, communities and the future of our sector. This policy ensures any advocacy, lobbying or public influence activity is conducted ethically, transparently, lawfully and in line with our values and B Corp commitments.

2. Scope

This policy applies to Directors, the Senior Leadership Team, Operations Managers, Department Heads, Consultants, third-party agencies and any employee authorised to communicate externally on policy or public matters on behalf of The Fendale Group.

3. What We Mean by Lobbying

Lobbying means any activity intended to influence public decision-making, legislation, policy, regulation or stakeholder decisions that impact our business, industry or communities. This may include meetings with MPs, councillors, local authority officers or regulators; engagement with hospitality trade associations; public consultation responses; and advocacy relating to employment, sustainability, licensing or hospitality legislation. Routine compliance conversations, supplier negotiations, customer communication and internal business decisions are not lobbying.

4. Our Principles

All advocacy activity must be transparent, honest, responsible, evidence-based and aligned with our values of Clarity, Craft and Partnership. We will never seek unfair advantage through inappropriate relationships, pressure, gifts or incentives.

5. Political Neutrality

The Fendale Group does not support political parties through business donations unless explicitly approved by the Board and clearly disclosed. Employees may hold personal political views, but these must not be presented as company views unless authorised.

6. Gifts, Hospitality & Influence

We will never offer or provide anything that could be perceived as bribery, inducement or inappropriate influence. This includes cash, financial incentives, excessive hospitality, personal favours, undisclosed gifts or preferential treatment in exchange for influence.

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7. Trade Associations & Industry Memberships

Where we join or participate in industry groups, we will seek alignment with our values. Where practical, we will understand the positions being promoted, assess alignment with our ethical standards and challenge positions that conflict with our commitments.

8. Record Keeping

Where lobbying or advocacy activity takes place, we will keep proportionate records including the date, stakeholder engaged, topic discussed, purpose, outcome or agreed actions, and any materials shared. This supports transparency and accountability.

9. Speaking Up

If any employee believes lobbying activity is inappropriate, unethical, misleading or inconsistent with our values, they should raise concerns through their line manager, HR/People Team, Senior Leadership or the whistleblowing route. Concerns will be taken seriously and handled fairly.

10. Legal Compliance

We will comply with all applicable laws and standards, including the UK Bribery Act 2010, the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, and any relevant governance or B Corp expectations.

Approval & Governance

Activity	Approval required
Engagement with MPs or elected officials	Director / Board approval
Public consultation responses	Relevant Director approval
Sector advocacy campaigns	Executive approval
Political donations	Board approval only
External lobbying through consultants	Board / Director approval

Our Commitment

At The Fendale Group, we will use our voice to support responsible hospitality, fair employment, strong communities and sustainable business practices.

Review cycle: Annual