

Lobbying Policy

Introduction

Farncombe Estate is committed to operating as a responsible and purpose-led hospitality business. This policy sets out how we engage with government, policymakers and regulators to ensure all lobbying supports positive social and environmental outcomes and aligns with our B Corp commitments.

Scope

The policy applies to all Farncombe entities, employees and representatives, and covers engagement with government, consultations, trade associations and public advocacy.

Definition of Lobbying

Lobbying includes communication with public officials, consultation participation, trade association activity and public campaigns intended to influence policy.

Guiding Principles

Any lobbying and political engagement undertaken by Farncombe will comply with the following principles:

- **Alignment with Purpose and Impact:** We will only support policies consistent with our sustainability, social and B Corp commitments.
- **Integrity and Transparency:** We will act honestly, provide accurate information, and maintain transparency and records of engagement
- **Evidence-Based Approach:** All public policy positions and lobbying activities will be informed by reliable, verifiable, or scientific evidence, and reflect recognised best practice where such evidence is available.
- **Political Neutrality:** Farncombe does not support or endorse political parties and will not engage in partisan lobbying.
- **Responsible Influence:** We will not weaken environmental or social protections or pursue short-term gain over long-term sustainability.

Policy Implementation

This policy is communicated to relevant employees and embedded within the Estate's decision-making processes governing any engagement with public authorities, regulators, or industry bodies.

Any formal engagement with public policy (including consultation responses or participation via trade associations) must be consistent with this policy and Farncombe's values.

Political Donations

Farncombe does not make political donations nor provide incentives to influence decision-making.

Trade associations

Farncombe will review its participation in trade associations and intermediary organisations periodically to ensure their lobbying activities are consistent with this policy and will take appropriate action where material misalignment is identified.

Compliance

All activity must comply with UK regulations and Farncombe's internal anti-bribery and corruption policies.

Compliance with this policy, including any lobbying activity undertaken, will be reviewed at least annually by the Executive Team

Risk Management and Monitoring

Farncombe will identify, manage, and monitor risks of non-compliance with this policy through:

- Periodic review of any lobbying or policy engagement activities
- Oversight by the Finance Director and Executive Team
- Recording and review of material engagements, where applicable
- The SLT will report on material lobbying activity to the Operations Board, where applicable.

Any identified risks or breaches of this policy will be addressed promptly by the SLT, with appropriate corrective action taken.

Governance

Oversight of lobbying activity sits with the Finance Director, who is accountable for ensuring compliance with and enforcement of this policy. The Finance Director will ensure the policy is reviewed at least annually to ensure it is updated in line with UK regulatory requirements and B Corp standards.

Stakeholder Concerns and Grievance

Farncombe is committed to transparency and accountability in its business conduct. Stakeholders may raise concerns regarding the Estate's lobbying activities or broader business practices through the company's grievance and whistleblowing procedures. All concerns will be handled in accordance with Farncombe's policies on ethical conduct and reporting.

Approved by the Board of Directors and Farncombe Executive Team

Effective Date: July 2026