



ELEMIS

Responsible Lobbying Policy

DOCUMENT RECORD

REV	CHANGES	DATE
1	Original	July 26
2	Appendix added	July 26

This Responsible Lobbying Policy (this “Policy”) applies to all ELEMIS employees and is mandatory for anyone carrying out work or services for or on behalf of ELEMIS.

OUR VISION

At ELEMIS, we believe in caring for skin, caring for the planet, and caring for people. Guided by our commitment to responsible growth and positive impact, we recognise that engaging with public stakeholders, such as governments, policy makers and public bodies, is a necessary and constructive part of operating as a global skincare brand.

While there is no single definition of lobbying, ELEMIS believes the most responsible approach to public policy engagement is through advocacy that reflects our values, expertise and ambitions. This includes collaborating with governments, industry bodies and NGOs to share expertise, contribute to consultations and participate in initiatives that help shape the future of our sector.

We will only engage in advocacy and public policy activity that contributes to a positive impact on society, the beauty industry and/or the environment. We will not support positions that undermine this commitment. Our approach is informed, where relevant, by globally recognised frameworks such as the UN Sustainable Development Goals.

This policy outlines the principles that guide how ELEMIS engages externally, ensuring that all advocacy activities are aligned with our purpose, our ethical standards and our commitment to sustainability, innovation, our code of business conduct and transparency.

OUR PRINCIPLES

INTEGRITY

We conduct all advocacy activities with honesty, care and accountability, ensuring full compliance with applicable laws and regulations.

- We do not offer or accept any improper advantage to influence policy or decision-making
- Our positions are grounded in reliable data (meaning evidence-based, replicable and, where possible, informed by independent research), scientific data, and responsible business practice

- In line with our internal policies, we manage gifts, hospitality and interactions with strict care:
 - Ensuring they remain appropriate and proportionate
 - Escalating to senior leadership where necessary
 - Always considering the intent and integrity behind any exchange
- We maintain a zero-tolerance approach to bribery and corruption in all forms, in line with our Code of Business Conduct and applicable laws
- ELEMIS does not make financial or in-kind contributions to political parties, candidates or political campaigns

TRANSPARENCY

We are committed to openness and clarity in how we engage externally.

- We communicate our key advocacy priorities and positions in line with our broader sustainability and business reporting
- Where relevant, we disclose our engagement in public policy discussions and industry initiatives
- We aim to ensure our stakeholders understand how our voice contributes to positive outcomes for people, planet and industry

CONSISTENCY

We strive for alignment between our advocacy activities and our brand values, purpose and sustainability commitments.

- **We** do not support positions or initiatives that conflict with our environmental, social or ethical principles
- We prioritise partnerships with organisations that demonstrate responsible and forward-thinking practices
- We actively contribute to industry collaboration and dialogue, recognising that collective progress is essential to addressing shared challenges

- Where ELEMIS engages with industry associations or third-party organisations that undertake advocacy on our behalf, we seek alignment with our principles. Where misalignment arises, we clearly articulate our position, seek to positively influence the organisation's stance and define clear 'red lines', reconsidering participation where positions fundamentally conflict with our values

This approach allows ELEMIS to engage constructively within industry platforms while maintaining clarity and integrity in the positions we take as a brand.

OUR COMMITMENT

Rooted in our heritage of innovation and respect for the natural world, our approach to advocacy reflects our dedication to protecting biodiversity, reducing environmental impact and supporting the communities connected to our business.

By engaging responsibly with policymakers and partners, we aim to contribute expertise that supports a more sustainable, resilient and inclusive future for the beauty industry and beyond.

GOVERNANCE AND OVERSIGHT

This policy is approved by the ELEMIS General Management Committee and reviewed on an annual basis.

Accountability for the implementation and oversight of this policy sits with the Chief Brand Officer.

This policy is embedded within ELEMIS through:

- integration into our Code of Business Conduct
- internal training programmes
- formal approval processes for advocacy and public engagements
- oversight and documentation of external engagements and partnerships

We identify, manage and monitor risks of non-compliance through ongoing risk assessments, including:

- review of advocacy activities and partnerships
- identification of potential legal, regulatory and reputational risks
- escalations of material risks to senior leadership

ELEMIS evaluates compliance with this policy through:

- periodic internal reviews and monitoring activities
- assessment of adherence to governance and control frameworks
- reporting to senior leadership where appropriate

Stakeholders can raise concerns regarding our business conduct or advocacy practices through our confidential grievance and whistleblowing channels, in line with our established procedures. These are published on our website.

This policy is publicly available and accessible to all stakeholders via our website.

This Policy has been reviewed and formally endorsed by the ELEMIS General Management Committee (GMC) and reflects our commitment to responsible lobbying.

APPENDIX – POLITICAL CONTRIBUTIONS 2025

ELEMIS does not make financial donations to political parties, candidates or causes. We contribute our time, expertise and industry knowledge through third-party organisations that advocate for policy and legislative change aligned with our material environmental and social impacts.

BETTER BUSINESS ACT UK (CURRENT)

ELEMIS supports B Lab UK's Better Business Act, a campaign calling for UK company law to ensure businesses consider the interests of people and the planet alongside shareholder value. ELEMIS is a member of the B Lab UK Better Business Act coalition and a signatory of the campaign. Our contribution is through time and expertise only.

B BEAUTY COALITION – COP30 LETTER TO LEADERS (NOV 2025)

In November 2025, ELEMIS contributed to the B Beauty Coalition's Going Beyond Campaign 'Letter to Leaders' at COP30. The campaign showcased the beauty industry's efforts to create positive outcomes for people and planet and called for systemic change towards a more just and regenerative future. ELEMIS helped shape the campaign's content and direction and shared examples of our Going Beyond initiatives within the letter and accompanying toolkit. We support the coalition through membership fees and by contributing time and expertise through working groups, educational activities and leadership roles.