skentel Clever Connectivity for Sustainable Futures

Responsible Lobbying Policy

Political engagement, transparency and integrity

skentel GROUP Limited

Government Affairs & Collective Action • B Corp evidence

Version 1.0 | Published 22 August 2026 | Next review August 2027
Approved by the Board of Directors

1. Purpose and Scope

This policy sets out how skentel GROUP Limited ("skentel" or "the Company") conducts all lobbying and political engagement activities. It applies to all employees, directors, officers, consultants, and third-party intermediaries acting on the Company's behalf, in the United Kingdom and any other jurisdiction in which we operate.

1.1 Definitions

In this policy:

> **"Lobbying"**
>
> Any direct or indirect communication with public officials, government bodies, regulators, legislators, or their staff with the intention of influencing public policy, legislation, regulation, or governmental decisions.
>
> **"The Board"**
>
> The Owner/Directors of skentel GROUP Limited, acting collectively.
>
> **"The Policy Owner"**
>
> The Managing Director, or another Director nominated by the Board.

1.2 Our scale and public policy activity

skentel is a small company and does not currently employ dedicated government affairs staff, make political donations, or engage directly with legislators. Our principal public policy exposure is through membership of trade associations and industry bodies.

This policy governs any lobbying activity should it arise, and applies in full to activity undertaken on our behalf by such bodies. The governance set out below is deliberately proportionate to our size: responsibilities rest with named individuals rather than with departments or Board sub-committees.

2. Commitment to Positive Societal and Environmental Impact

skentel is committed to conducting all lobbying activities solely in ways that contribute to a positive impact on society and the environment. We will engage with policymakers only where we genuinely believe our participation supports outcomes that are beneficial to the public interest, consistent with a just transition to a sustainable economy, and aligned with our published sustainability and corporate responsibility commitments.

Specifically, we commit to:

- Advocate only for policies we believe will produce net-positive outcomes for people, communities, and the natural environment.
- Refrain from lobbying against climate action, biodiversity protections, human rights safeguards, or other measures whose adoption would benefit society, even where such measures may impose short-term costs on the Company.
- Ensure that our public policy positions are consistent with our stated corporate values and ESG commitments, and that we do not take contradictory positions across different forums or jurisdictions.
- Disclose our lobbying positions transparently to stakeholders, including through our annual sustainability or non-financial reporting.

3. Evidence-Based Approach to Lobbying

skentel's lobbying activities are grounded in reliable data and, where available, peer-reviewed scientific evidence. We will not advance policy positions that are contradicted by scientific consensus or that rely on selective, misleading, or unverified information.

Our approach requires that:

- All policy positions and supporting materials are prepared or reviewed by suitably qualified internal or external experts before submission to government bodies.
- Where scientific consensus exists on a topic (e.g. climate change, public health), our positions respect and reflect that consensus.
- Sources used in lobbying submissions are documented, credible, and disclosed wherever permissible under applicable confidentiality requirements.
- Any economic, financial, or empirical data used to support our positions is sourced from reputable institutions and is not cherry-picked or presented in a misleading manner.

4. Financial and In-Kind Political Contributions

skentel recognises that political contributions — whether financial or in-kind — carry significant reputational, legal, and ethical risks. Our approach is governed by the following principles.

4.1 Direct Political Donations

- skentel does not make direct financial contributions to political parties, candidates, or electoral campaigns from corporate funds, unless expressly permitted by applicable law and approved in advance by the Board.
- Where such contributions are legally permitted and Board-approved, they will be fully disclosed in the Company's annual report and any applicable public registers.

4.2 In-Kind Contributions

- In-kind contributions include, but are not limited to, the provision of company resources, personnel time, venues, equipment, or services to political organisations or campaigns.
- All such contributions require pre-approval from the Policy Owner and must be recorded in a political contributions register maintained by the Compliance Manager.
- The aggregate value of all financial and in-kind contributions will be disclosed annually and made available to shareholders on request.

5. Anti-Corruption and Anti-Bribery

skentel has a zero-tolerance approach to bribery and corruption in all its forms. This principle extends without exception to all government affairs and lobbying activities.

- No employee or representative of the Company may offer, promise, give, request, or accept any bribe, facilitation payment, or improper advantage to or from any public official, government employee, or political party in connection with the Company's lobbying activities.
- This policy is consistent with and supplementary to the Company's Anti-corruption and bribery policy, the UK Bribery Act 2010, and equivalent anti-corruption legislation in any jurisdiction in which we operate.
- Hospitality, gifts, and entertainment offered to or received from public officials must be proportionate, transparent, lawful, and pre-approved in accordance with section 4 (Gifts and Hospitality) of our Anti-corruption and bribery policy. No gift or entertainment may be provided with the intention of improperly influencing a decision.
- All expenses related to lobbying activities must be recorded accurately in the Company's financial systems and approved by the relevant budget holder.
- Any employee who suspects a breach of this section must report it promptly under our Whistleblowing Policy, or directly to the Managing Director, the General Manager, or the Compliance Manager. Retaliation against good-faith reporters is strictly prohibited.

6. Responsible Lobbying Through Intermediary Organisations

The Company engages with trade associations, industry coalitions, think tanks, and professional lobbying firms (collectively, "Intermediaries"). As set out in section 1.2, this is our principal public policy exposure, and our responsibilities under this policy extend in full to activities conducted on our behalf by such organisations.

6.1 Selection and Due Diligence

- Before engaging any Intermediary to conduct lobbying activities on the Company's behalf, the Policy Owner must conduct appropriate due diligence to assess whether the Intermediary's values, public positions, and track record are consistent with this policy.
- Intermediaries must be registered in the relevant lobbying register where required by law.

6.2 Contractual Controls

- All material lobbying engagements with external firms or consultants must be governed by a written contract that includes: (i) a requirement to comply with this policy; (ii) a prohibition on bribery and corruption; (iii) a requirement to disclose any conflicts of interest; and (iv) the right of the Company to audit compliance.
- Membership of trade associations and industry bodies must be reviewed annually by the Policy Owner to assess alignment with this policy.

6.3 Monitoring Consistency

- Where an Intermediary takes a public position on policy matters that materially contradicts this policy or the Company's own stated positions, the Policy Owner must escalate the matter to the Compliance Manager and, if unresolved, to the Board.
- The Company will, where practicable, seek to influence the Intermediary to adopt a position consistent with this policy. If a satisfactory resolution cannot be reached within a reasonable timeframe, the Company will consider suspending or terminating its membership or engagement.
- The Company will publicly disclose its material trade association memberships and, where significant misalignment exists, will explain the nature of the misalignment and the steps being taken to address it.

7. Governance, Review, and Accountability

7.1 Policy Ownership

Day-to-day responsibility for implementing this policy rests with the Policy Owner. The Compliance Manager is responsible for ensuring the policy meets all applicable legal and regulatory requirements, taking external legal advice where the matter warrants it.

7.2 Formal Approval and Review

- This policy is formally approved by the Board.
- The policy will be reviewed and re-approved by the Board at least annually, and promptly following any material change in the Company's business strategy, geographic footprint, applicable law, or stakeholder expectations.
- The Policy Owner will table a short annual review at a Directors' meeting, minuted, covering all material lobbying activities, political contributions (including a nil return where applicable), trade association memberships, and any identified instances of non-compliance during the year.
- The Board may seek independent external advice on the Company's lobbying activities and related disclosures at any time.

7.3 Training and Awareness

This policy is covered with all new starters at induction, and is reviewed with the whole team at least annually. Any employee taking on responsibility for engagement with government bodies or trade associations is briefed on this policy before doing so. Records of induction and annual reviews are maintained by the General Manager.

8. Reporting, Disclosure, and Breaches

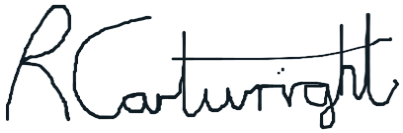
- The Company will state annually whether it has engaged in any lobbying activity, and will disclose any associated expenditure and principal policy objectives, in its annual report or sustainability report. Where there has been no such activity, a nil return will be recorded.
- Any employee who becomes aware of an actual or suspected breach of this policy must report it immediately under our Whistleblowing Policy, or directly to the Managing Director, the General Manager, or the Compliance Manager.
- Confirmed breaches will be investigated and may result in disciplinary action up to and including termination of employment, and, where applicable, referral to relevant regulatory authorities.

Approval Record

This policy was reviewed and approved by the Board of skentel GROUP Limited:

Item	Detail
Approving body	The Board — the Owner/Directors of skentel GROUP Limited
Policy Owner	Rob Cartwright, Managing Director
Legal and regulatory review	Compliance Manager, with external legal advice where required
Training records	General Manager
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Signed on behalf of the Board:



Rob Cartwright
Managing Director, skentel GROUP Limited

Date: 22 August 2026