# Policy on Responsible Lobbying and Policy Influencing

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| **Version** | **Issued** | **Revised** | **Next review due** | **Owner** |
| 1. | 16.07.2025 |  | 30.12.2026 | AMDAP ESG Leadership Group |

## Scope

This policy applies to all PADMA Directors, employees and contracted agents working in this area on behalf of PADMA.

## Purpose

The purpose of this policy is to outline the principles and procedures that PADMA, its employees, and directors will adhere to when engaging in activities aimed at influencing public policy. We are committed to conducting these activities in a manner that is transparent, accountable, consistent with our values, and fully legitimate.

## Definitions and Principles

**Transparency:** Any lobbying and policy influencing activities will be conducted openly and honestly. We will disclose our involvement when appropriate and comply with all relevant registration and reporting requirements.

**Accountability:** Individuals engaging in lobbying activities are accountable for their actions and must adhere to this policy and all applicable laws and regulations. Clear records of our lobbying efforts, including meetings and submissions, will be maintained.

**Consistency:** Our policy influencing efforts will be consistent with our company's core values, strategic objectives, and publicly stated positions. We will ensure a unified and coherent approach across all our interactions with policymakers.

**Legitimacy:** We will engage with policymakers and other stakeholders respectfully and ethically, providing accurate and evidence-based information. We will not engage in any activities that could be perceived as unethical, corrupt, or contrary to the public interest.

## Our Commitment

By adhering to the following principles and commitments, PADMA aims to contribute to sound public policy in a responsible and ethical manner, fostering trust and maintaining our reputation for integrity.

## Policy and Procedures

**5.1 Compliance with Laws and Regulations:** We will strictly adhere to all laws, regulations, and codes of conduct governing lobbying and policy influencing at all levels of government.

**5.2 Ethical Conduct:** All interactions with policymakers and their staff will be conducted with the highest ethical standards, avoiding any conflicts of interest or the appearance thereof.

**5.3 Accurate Information:** We will provide policymakers with accurate, reliable, and relevant information to support informed decision-making. We will clearly distinguish between factual data and our company's opinions or interpretations.

**5.4 Respectful Engagement:** We will engage in constructive dialogue with policymakers and other stakeholders, respecting diverse perspectives and contributing to informed public debate.

**5.5 Internal Approval and Oversight:** Significant lobbying activities and policy positions will be subject to appropriate internal review and approval processes to ensure alignment with this policy and our overall strategy.

**5.6 Training and Awareness:** We will provide relevant training and guidance to employees and directors involved in policy influencing to ensure they understand and comply with this policy.

**5.7 Regular Review:** This policy will be reviewed periodically to ensure its ongoing relevance and effectiveness in light of evolving legal and ethical standards.

## Implementation and Responsibilities

**AMDAP ESG Leadership Group** is responsible for overall communication, implementation and management of this policy.

**PADMA Country Directors** re responsible for fostering a culture of compliance and ensuring that relevant employees receive adequate training on responsible lobbying and policy influencing.

**The Global Head of ESG** oversees this policy on behalf of AMDAP leadership group

## Monitoring and Review

The effectiveness of this policy will be regularly monitored and reviewed to ensure its continued suitability, adequacy, and effectiveness. This will include:

* Regular assessments of the company's participation in activities related to lobbying and policy influencing (for example, through trade associations)
* Analysis of reports received through the grievance processes.
* Monitoring of legal and regulatory developments.

The findings of these reviews will be reported to the ESG Leadership Group who will review them on behalf of AMDAP Directors and recommend any necessary updates to this policy and related procedures.

## Related Policies

Code of Business Ethics

Anti-Bribery and Corruption Policy

## Approval

**Approved by Padma Textiles ESG Leadership Group**

**16.07.2025**

**Approved by Marvic Fenech Adami, CFO, on behalf of AMDAP Ltd.**

**16.07.2025**