

Group Political Lobbying policy

Gamma Communications plc (“Gamma”)

Scope

Gamma Communications plc and its subsidiaries (over 50% ownership) (together: “**Group Companies**”).

Definitions

“**Lobbyist**” means

- an ex government minister, and
- a company which lobbies government ministers

“**Political Lobbying**” means actively seeking to influence elected representatives, senior civil servants and unelected members of government or legislature in

- a) their work to create, amend or approve primary legislation, or
- b) the asking of public questions in a parliament or equivalent body.

“**Consultation Responses**” mean

- a) written or verbal responses to government or government-controlled bodies or regulators which seek industry feedback or comment, or
- b) meetings with regulators to discuss industry issues, or
- c) meetings with or responses to parliamentary or other elected representatives or groups who are seeking to understand the operation of the industry better.

Background

The Board of Gamma (“the Board”) recognises that there are potential reputational risks in Political Lobbying and therefore requires tight control over any such activity. In normal circumstances the Board does not envisage authorising Political Lobbying involving the payment of a Lobbyist.

Policy

No Group Company may conduct any Political Lobbying involving the payment of a Lobbyist without the prior written approval of the Board of Gamma Communications plc.

Political Lobbying activities are to be reported to the Company Secretary who will maintain a rolling register.

Consultation Responses (including those which involve payment to consultants) should be authorised by one of: Gamma's CEO, CFO, Company Secretary, Commercial Director-Channel (who manages the regulatory function). The author of a response may not authorise it themselves.

Notes for clarification

Subscriptions to trade associations do not constitute payment of a Lobbyist.

Use of consultants or intermediaries to assist with sales to government departments does not constitute Political Lobbying.

27 January 2022