

BOLSIUS GROUP



RESPONSIBLE LOBBYING POLICY

Version 1.0

Date 27-11-2025

Table of contents

1	Policy governance.....	3
1.1	General.....	3
1.2	Purpose	3
1.3	Scope	3
1.4	Roles and responsibilities	4
1.5	Policy review	4
2	Our approach to responsible lobbying	5
2.1	Positive impact.....	5
2.2	Evidence-based advocacy.....	5
2.3	Political contributions	5
2.4	Anti-corruption & bribery	6
2.5	Responsible engagement with intermediaries.....	6
3	Governance, control and risk management.....	7
3.1	Accountability for policy enforcement	7
3.2	Policy embedding	7
3.3	Compliance monitoring and risk management.....	7
3.4	Stakeholder grievance mechanism	8
4	Transparency and lobbying disclosure.....	9
5	Appendix	10
5.1	Appendix A: Register of industry associations, trade bodies, and multi-stakeholder platforms	10
5.2	Appendix B: Responsible lobbying annual declaration.....	11
5.2.1	Responsible lobbying annual declaration FY 2024.....	11

1 Policy governance

1.1 General

- **Current version & update history**
 - o Current version: 1.0
 - o Issue date: November 2025
- **Policy owner**
 - o Sustainability office
- **Responsible executive**
 - o Chief Executive Officer (CEO)
- **Contact person**
 - o Tamara Schuitvlot, Head of Sustainability
- **Approval body**
 - o Board of Directors
- **Review frequency**
 - o Every two years, or earlier if required due to regulatory, organizational, or governance changes
- **Related documents**
 - o Internal Business Ethics Policy

1.2 Purpose

This policy sets out Bolsius International B.V.'s commitment to conducting all lobbying and advocacy activities in a responsible, ethical, and transparent manner. Our approach is fully aligned with the United Nations Sustainable Development Goals (UN SDG) and the United Nations Global Compact (UNGC). By establishing clear principles for policy engagement, we ensure that any advocacy we undertake supports positive social and environmental impact and reflects our organizational values.

1.3 Scope

This policy applies to the entire Bolsius Group, with Bolsius International B.V. as the parent company and all subsidiaries. It covers all forms of direct and indirect

lobbying or advocacy, including participation in trade associations, industry bodies, intermediary organizations, and multi-stakeholder platforms where policy influence or public representation may occur. All such engagements must align with our values, sustainability commitments, and responsible governance expectations.

1.4 Roles and responsibilities

Bolsius' Chief Executive Officer (CEO) holds overall accountability for this policy and ensures that all direct and indirect lobbying activities are aligned with Bolsius' values, sustainability commitments, and responsible governance expectations.

The Head of Sustainability is responsible for operational oversight, including coordinating policy implementation across all relevant functions.

1.5 Policy review

This policy is formally reviewed and approved by the Board of Directors, with the Chief Executive Officer (CEO) acting as the responsible executive representative for its implementation.

The policy is reviewed at least every two years to assess whether updates or revisions are required, taking into account changes in legislation, governance practices, stakeholder expectations, or Bolsius' business activities. Any revisions are subject to approval by the Board of Directors.

2 Our approach to responsible lobbying

2.1 Positive impact

Bolsius engages in lobbying activities only where such engagement is intended to contribute to a positive social or environmental impact, including benefits for consumers, communities, and the planet.

The company does not engage in lobbying that undermines societal well-being, environmental protection, or responsible public policy.

2.2 Evidence-based advocacy

All lobbying positions and policy engagements must be based on reliable or scientific data.

- Reliable data refers to evidence-based and replicable information derived from credible sources, including independent market research and publicly available datasets.
- Scientific data refers to research conducted by qualified scientists and published in reputable peer-reviewed journals.

Bolsius does not support the use of misleading, incomplete, or manipulated information in any lobbying or policy engagement activities.

2.3 Political contributions

Bolsius does not make direct financial or in-kind contributions to political parties, political candidates, or political campaigns.

Any potential future involvement of this nature would require prior approval from the Board of Directors and must comply with the principles and standards set out in this policy and applicable laws.

2.4 Anti-corruption & bribery

All lobbying activities must comply with Bolsius' Business Ethics Policy, as outlined in the Employee Handbook, which enforces a zero-tolerance approach to bribery and corruption.

Employees and representatives must not offer, promise, or provide any improper advantage to public officials or other parties in connection with lobbying or policy engagement activities.

Any suspected cases of bribery, corruption, or unethical conduct must be reported promptly through the company's whistleblower procedure.

2.5 Responsible engagement with intermediaries

Bolsius may engage with intermediary organizations, such as industry associations, business groups, or advocacy organizations, where such engagement supports responsible public policy and aligns with the company's values.

Bolsius seeks to ensure that its participation in such organizations is consistent with its commitment to positive social and environmental impact. Appendix A provides a list of intermediary organizations with which Bolsius is currently affiliated.

The company periodically reviews the policy positions and activities of these organizations to assess alignment with Bolsius' values, sustainability commitments, and responsible lobbying approach.

Where differences in positions arise, Bolsius will communicate its own stance and seek constructive dialogue to encourage alignment. If material misalignment persists and cannot be resolved, Bolsius may reconsider, suspend, or discontinue its participation in the intermediary organization.

3 Governance, control and risk management

3.1 Accountability for policy enforcement

As outlined in the Policy Governance section, the Chief Executive Officer (CEO) holds overall accountability for the enforcement of this policy and ensures that all direct and indirect lobbying activities are conducted in accordance with Bolsius' values, sustainability commitments, and responsible governance principles.

The Head of Sustainability is responsible for operational oversight of the policy, including coordinating its implementation across relevant functions and ensuring that lobbying activities remain consistent with the company's responsible lobbying commitments.

3.2 Policy embedding

Bolsius embeds the principles of this policy into its business practices through internal communication, governance processes, and management oversight. The policy is communicated through internal channels to ensure that relevant employees understand the expectations for responsible lobbying and policy engagement.

Where relevant, the policy is integrated into existing governance frameworks, including sustainability, compliance, and corporate governance processes. These measures support consistent implementation and help ensure that lobbying activities remain aligned with Bolsius' commitment to positive societal and environmental impact.

3.3 Compliance monitoring and risk management

Bolsius identifies and monitors risks of non-compliance with this policy across all potential forms of lobbying or policy influence. This includes:

- risks of misalignment between Bolsius' policy positions and those of intermediary organizations or industry associations;

- risks arising from external communications, public statements, or advocacy activities;
- risks of unintended or unauthorized lobbying activities;
- risks associated with interactions with public officials or regulatory bodies; and
- risks related to governance processes or employee conduct. Where risks are identified, they are documented and reviewed.

Where such risks are identified, they are documented and reviewed as part of the company's governance and compliance processes. Bolsius periodically evaluates compliance with this policy and the effectiveness of its governance and control framework. Where necessary, corrective actions are implemented to address identified gaps or misalignments.

Oversight of compliance monitoring forms part of Bolsius' broader governance review processes and is reported at the executive level.

3.4 Stakeholder grievance mechanism

Stakeholders can raise concerns regarding Bolsius' business conduct or lobbying practices through the company's grievance procedure. This mechanism enables internal and external stakeholders to report concerns confidentially, and anonymously where permitted by law, without fear of retaliation.

All reports are assessed and investigated in accordance with the established grievance process, and appropriate actions are taken where concerns are substantiated.

4 Transparency and lobbying disclosure

This policy is publicly available on the Bolsius website and accessible to all stakeholders.

At the end of each fiscal year, Bolsius will publish a *Responsible Lobbying Declaration* (see 5.2 Appendix B). This declaration will:

- confirm whether any lobbying activities have taken place during the reporting period,
- disclose the value and recipients of any financial or in-kind political contributions, where applicable,
- summarize any material lobbying positions or public policy engagements undertaken by the company, and
- provide an overview of Bolsius' participation in intermediary organizations involved in policy engagement.

Where Bolsius identifies a material misalignment between its policy commitments and the positions of an intermediary organization that cannot be resolved through engagement, this will be disclosed in the annual declaration.

5 Appendix

5.1 Appendix A: Register of industry associations, trade bodies, and multi-stakeholder platforms

Organization	Type of body/association	Purpose/relevance	Link to website
European Candle Manufacturers Association (ECMA)	Industry association	ECMA, is the collective voice of European candle makers and their suppliers. It promotes the safe use and enjoyment of candles, and it makes sure that that the candle makers interests are heard and understood.	ECMA
Recycling Aluminium Verpakkingen Nederland (RAVN)	Industry association	RAVN's objective is to promote and coordinate the responsible collection, recycling, and circular use of aluminum packaging in the Netherlands.	RAVN
Roundtable on Sustainable Palm Oil (RSPO)	Multi stakeholder platform	The RSPO's objective is to promote the production, procurement, and use of sustainable palm oil through globally recognized standards and a multi-stakeholder certification system.	RSPO

5.2 Appendix B: Responsible lobbying annual declaration

5.2.1 Responsible lobbying annual declaration FY 2024

Bolsius International B.V. (Group) did not undertake any direct lobbying activities during FY 2024 and incurred no lobbying expenditures.

Bolsius did not make any financial or in-kind political contributions during FY 2024. The total value of political contributions was €0, and no recipients were identified.

Bolsius participates in certain industry associations that may engage in policy discussions relevant to the sector. These include the European Candle Manufacturers Association (ECMA), where the CEO of Bolsius serves as a board member, as well as RSPO and RAVN.

Participation in these organizations is conducted in line with Bolsius' Responsible Lobbying Policy and is focused on promoting responsible industry practices, sustainability standards, and circularity.

Bolsius periodically reviews the positions and activities of these associations to assess their alignment with its Responsible Lobbying Policy and confirms that their positions in FY 2024 were consistent with its policy commitments.

This declaration is overseen by the Board of Directors of Bolsius International B.V. and is published on the company website as part of Bolsius' Responsible Lobbying Policy. The declaration will be updated and published annually following the end of each fiscal year.