RESPONSIBLE LOBBYING POLICY

1. PURPOSE AND SCOPE

This policy sets out Pizza Pilgrims' approach to lobbying and political engagement. It applies to all directors, employees, and agents acting on behalf of the business, and to any trade bodies or other intermediary organisations through which Pizza Pilgrims participates in policy advocacy.

Pizza Pilgrims is committed to engaging with public affairs and policy in a way that is transparent, evidence-based, and consistent with our purpose of having a positive impact on people and the planet.

2. OUR POSITION ON LOBBYING

Pizza Pilgrims does not engage directly in lobbying, defined as direct communication with elected officials, government ministers, or regulatory bodies with the intention of influencing legislation, regulation, or public policy.

Pizza Pilgrims participates in advocacy activities coordinated by **UK Hospitality (UKH)**, the principal trade association for the hospitality sector in the United Kingdom. This includes signing collective representations to government on matters affecting the hospitality industry. This constitutes indirect lobbying and is the primary form of political engagement Pizza Pilgrims currently undertakes.

This policy governs how Pizza Pilgrims manages that engagement and ensures its conduct remains consistent with the commitments below.

3. LOBBYING OBJECTIVES

Pizza Pilgrims will only support lobbying activity, whether direct or indirect, that contributes to a positive impact on society or the environment. In assessing lobbying positions, Pizza Pilgrims uses the outcome areas of the B Lab Standards and the United Nations Sustainable Development Goals (UN SDGs) as reference frameworks for what constitutes a positive impact.

Pizza Pilgrims will not support, and will not remain associated with, lobbying that works against the interests of workers, local communities, or the natural environment.

4. EVIDENCE-BASED POSITIONS

Any lobbying position Pizza Pilgrims takes or supports must be grounded in reliable and, where available, scientific evidence:

- Reliable evidence: positions are based on independently verifiable data, credible market research, or the findings of independent bodies.
- Scientific evidence: where environmental or public health matters are in scope, Pizza Pilgrims will prioritise positions that reflect published scientific consensus, including peer-reviewed research.

Pizza Pilgrims will not support lobbying positions that contradict scientific consensus on issues such as climate change, public health, or environmental impact.

5. POLITICAL AND FINANCIAL CONTRIBUTIONS

Pizza Pilgrims does not make, and will not make, any of the following:

- Direct financial contributions to any political party, politician, or campaign.
- In-kind contributions, including staff time, goods, or services, intended to benefit a political party or campaign.
- Donations or payments to political action committees or equivalent bodies.

This prohibition applies across all jurisdictions in which Pizza Pilgrims operates.

6. ANTİ-CORRUPTİON AND BRİBERY

Pizza Pilgrims has a zero-tolerance approach to corruption and bribery in all its forms. No payment, gift, hospitality, or other benefit will be offered to, or accepted from, any public official, politician, or government body in a manner intended to improperly influence a decision.

All directors and employees are required to comply with the UK Bribery Act 2010 and any applicable equivalent legislation. Any suspected breach of this commitment should be reported immediately through the mechanism described in Section 11.

7. İNTERMEDİARY ORGANİSATİONS

7.1 UK HOSPİTALİTY (UKH)

Pizza Pilgrims participates in advocacy activities coordinated by UK Hospitality, the principal trade body for the UK hospitality sector. UKH engages with government on issues including business rates, employment and workforce policy, food safety and licensing, energy regulation, skills and apprenticeships, and tourism. Pizza Pilgrims engages with UKH on a non-membership basis, participating in collective advocacy activities such as open letters and representations to government. Pizza Pilgrims supports this engagement because a well-regulated, thriving hospitality sector creates positive outcomes for workers, communities, and local economies.

Pizza Pilgrims monitors UKH's lobbying positions on an ongoing basis to ensure continued alignment with this policy. Where tensions are identified, for example, where sector-wide positions on employment costs conflict with Pizza Pilgrims' commitment to fair pay, these are managed through the alignment review process described in Section 7.2.

7.2 ANNUAL ALİGNMENT REVİEW

Pizza Pilgrims conducts an annual review of UKH's publicly stated lobbying positions to assess their consistency with this policy. The review is led by the Policy Owner (see Section 8.2) and produces a documented record including:

- A summary of UKH's key lobbying positions during the review period.
- An assessment of alignment with Pizza Pilgrims' lobbying objectives, with reference to social and environmental impact.
- A record of any positions where Pizza Pilgrims' view differs from UKH's, and of any steps taken or planned to positively influence UKH's position.

This record is retained as internal evidence. Where material misalignment is identified and publicly disclosed in line with Section 7.3, a summary will also be made available on the company website.

7.3 PUBLİC REPORTİNG AND RED LİNES

Where Pizza Pilgrims identifies a material misalignment between UKH's lobbying positions and this policy, the company will publicly disclose:

- Pizza Pilgrims' own position on the matter, compared to UKH's stated position.
- The steps Pizza Pilgrims is taking to positively influence UKH's stance.
- The conditions under which Pizza Pilgrims would cease engagement with UKH.

Pizza Pilgrims will consider ceasing engagement with UKH if UKH:

- Adopts and actively promotes a lobbying position that contradicts climate science or obstructs progress towards net zero.
- Advocates for policies that would exploit workers, undermine fair pay, or otherwise cause material harm to the wellbeing of people employed in the hospitality sector.

- Pursues a position that would cause significant harm to the communities or natural environments in which Pizza Pilgrims operates.
- Declines to engage in good faith with Pizza Pilgrims' concerns after a reasonable period of dialogue.

Any decision to cease engagement with UKH will be made by the Policy Owner in consultation with the Naples Bidco Board.

7.4 ZERO CARBON FORUM

Pizza Pilgrims is a member of the Zero Carbon Forum (ZCF), a not-for-profit organisation that supports UK hospitality businesses in reaching net zero carbon targets. ZCF facilitates collaboration between members on carbon measurement, reduction planning, and operational best practice, and engages with government in support of the sector's decarbonisation. ZCF's objectives are fully consistent with Pizza Pilgrims' lobbying policy: its positions advocate for climate action and emissions reduction in line with published scientific consensus. No material misalignment risk has been identified with this membership. ZCF's activities and positions are included in the annual review described in Section 7.2.

8. GOVERNANCE AND ACCOUNTABİLİTY

8.1 APPROVİNG BODY

This policy is approved by the Naples Bidco Board of Directors, the highest governing body within Pizza Pilgrims' certification scope. The Board reviews and re-approves the policy on an annual basis, or following any material change in Pizza Pilgrims' lobbying activities or intermediary relationships.

8.2 POLİCY OWNER

Operational accountability for this policy rests with Thom Elliot, Co-Founder. The Policy Owner is responsible for:

- Leading the annual UKH alignment review (Section 7.2).
- Ensuring the policy is current, accessible, and communicated to the senior leadership team.
- Escalating material concerns to the Naples Bidco Board.
- Reporting on lobbying-related risks and activities at the annual Board review.

9. EMBEDDİNG AND COMMUNİCATİON

9.1 İNTERNAL COMMUNİCATİON

This policy is communicated to the senior leadership team and is included in onboarding documentation for directors and senior managers. It is reviewed as part of the annual Board governance calendar.

9.2 PUBLİC AVAİLABİLİTY

This policy is published on the Pizza Pilgrims website and is accessible to all stakeholders.

10. RİSK MANAGEMENT AND COMPLİANCE

10.1 RİSK İDENTİFİCATİON

The primary lobbying-related risk for Pizza Pilgrims is the adoption by UKH of a lobbying position that conflicts with this policy. Secondary risks include inadvertent breach of anti-bribery legislation through hospitality or gift-giving. These risks are managed through the annual alignment review, ongoing monitoring, and the controls described in this policy.

10.2 ONGOİNG MONİTORİNG

The Policy Owner monitors UKH communications, published position papers, and public statements throughout the year. Any material concern identified between annual reviews is escalated to the Naples Bidco Board without delay.

10.3 COMPLİANCE EVALUATİON

Compliance with this policy is evaluated as part of the annual Board review. The Policy Owner confirms to the Board that:

- No direct lobbying has been undertaken.
- No political contributions have been made.
- The annual UKH alignment review has been completed, and any identified misalignments have been addressed or are subject to an active management plan.
- The grievance mechanism has been accessible, and any concerns received have been investigated.

11. GRİEVANCE AND ESCALATİON

Any stakeholder, internal or external, who has a concern about Pizza Pilgrims' lobbying conduct, or believes this policy has not been followed, may raise that concern through the company's grievance procedure.

Concerns may be submitted confidentially. Pizza Pilgrims is committed to investigating all concerns raised in good faith and to providing a written response within a reasonable timeframe.