nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

RESPONSIBLE LOBBYING POLITICAL ENAGEMENT

OUR COMMITMENT

neteen47 is committed to acting responsibly, transparently and ethically in any activity that may influence public policy or public decision-making.

We do not undertake direct political lobbying, employ professional lobbyists, make political contributions or engage in party-political campaigning.

We recognise, however, that lobbying and advocacy can include a broad range of activities, including contributing to public consultations, engaging with policymakers and participating in policy discussions through professional or industry organisations.

Where nineteen47 undertakes or supports this type of activity, we will do so responsibly and in accordance with the principles set out in this policy.

WHAT WE MEAN BY LOBBYING AND ADVOCACY

Lobbying and advocacy may include:

- communicating directly or indirectly with elected representatives, public officials or policymakers with the intention of influencing public decision-making;
- responding to consultations or contributing to the development of legislation, regulation or public policy;
- making representations about proposed changes to legislation, regulation or planning policy;
- supporting public campaigns intended to influence government policy or public decision-making; and
- policy advocacy undertaken through consultants, professional bodies, trade associations or other membership organisations.

This includes activity undertaken directly by nineteen47 and activity undertaken on our behalf by another person or organisation.

OUR PROFESSIONAL WORK

As a planning, design and built environment consultancy, nineteen47 regularly engages with local authorities and other public bodies as part of delivering professional services to clients.

This may include:

- preparing and submitting planning applications;
- communicating with planning officers;
- responding to requests for technical information;
- providing professional planning and design advice; and
- making project-specific representations through established planning processes.

We distinguish this normal professional activity from activity intended to influence wider legislation, regulation, planning policy or public decision-making on behalf of nineteen47.
Where an activity goes beyond a particular project and seeks to influence wider policy, it is considered under the responsible lobbying principles set out below.

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

OUR RESPONSIBLE LOBBYING PRINCIPLES

Any lobbying, advocacy or political engagement undertaken by or formally on behalf of nineteen47 must be:

Transparent

We will be clear about who we are, whose interests we are representing and the purpose of our engagement.

We will not conceal our involvement or knowingly create a misleading impression about the support for a policy position.

Accurate and evidence-based

Our positions will be informed by credible professional evidence, relevant experience and, where appropriate, reliable scientific or technical information.

We will not knowingly provide false, incomplete or misleading information to policymakers, public officials, stakeholders or the public.

Consistent with positive outcomes

Our lobbying or advocacy activity should seek to contribute to positive social or environmental outcomes.

At a minimum, it must not undermine our social, environmental or ethical commitments.

Consistent with our values

Any position formally supported by nineteen47 must be consistent with:

- our purpose and values;
- responsible and sustainable development;
- ethical business conduct;
- our B Corp commitments;
- relevant professional standards; and
- applicable law and regulation.

Respectful and responsible

We will engage constructively and professionally with policymakers, public bodies, communities and other stakeholders.

We will not use improper influence or seek privileged access through gifts, hospitality, payments or personal relationships.

Properly governed

Material lobbying, advocacy or political engagement undertaken in nineteen47's name must be appropriately reviewed and receive prior written approval from a Director.

Relevant activity will be recorded and reviewed in proportion to its nature and significance.

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

PROFESSIONAL AND INDUSTRY MEMBERSHIPS

nineteen47 and individual members of our team belong to professional institutions, trade associations, business networks and regional organisations.

Some of these organisations may:

- respond to public consultations;
- make representations to government or local authorities;
- publish policy recommendations;
- campaign for legislative, regulatory or policy change; or
- undertake advocacy on behalf of their wider membership.

Our membership of an organisation does not necessarily mean that nineteen47 has participated in, approved or endorsed every policy position, submission or campaign supported by that organisation.

We recognise that membership subscriptions may indirectly support an organisation's wider activities, including policy advocacy. We therefore periodically review relevant memberships and our involvement in policy activity.

Where an organisation takes a position that materially conflicts with our values or commitments, we may:

- seek clarification from the organisation;
- communicate our disagreement;
- decline to participate in the relevant activity;
- ask for our name to be removed from a position or campaign; or
- review or end our membership.

CONSULTATIONS AND POLICY DISCUSSIONS

nineteen47 may respond to public consultations or contribute to policy discussions where the subject is relevant to our expertise, work, communities or social and environmental commitments.

Before formally supporting a policy position on behalf of nineteen47, we will consider:

- the evidence supporting the position;
- the potential social and environmental implications;
- whose interests are being represented;
- any actual, potential or perceived conflicts of interest;
- relevant client and confidentiality obligations; and
- whether the position is consistent with our values and commitments.

THIRD PARTIES ACTING ON OUR BEHALF

If nineteen47 appoints a consultant, adviser, lobbyist or other third party to engage with elected representatives, public officials or policymakers on our behalf, we will undertake proportionate due diligence before the appointment is made.

This will include considering:

- the purpose and scope of the proposed work;
- the individual's or organisation's reputation and experience;
- possible conflicts of interest;
- the reasonableness and transparency of its fees;
- its approach to anti-bribery, responsible lobbying and political engagement;
- any lobbying registration or public disclosure requirements; and
- whether the proposed activity is consistent with our values and B Corp commitments.

Any appointment must be approved by the Board and set out in writing. Third parties acting on our behalf must comply with applicable law and our relevant ethical standards and policies.

No third party may make political contributions, offer gifts or hospitality, appoint another intermediary or adopt a public policy position in nineteen47's name unless expressly authorised to do so.

POLITICAL CONTRIBUTIONS AND PARTY-POLITICAL ACTIVITY

nineteen47 does not make financial or in-kind contributions to:

- political parties;
- election candidates;
- party-political campaigns; or
- organisations whose primary purpose is to secure the election of a political party or candidate.

Our funds, facilities, systems, working time and other resources must not be used to support party-political activity.

Our employees may participate in lawful political activity in a personal capacity. When doing so, they must make clear that their views are their own and must not use nineteen47's name, branding or resources without permission.

GIFTS, HOSPITALITY AND IMPROPER INFLUENCE

nineteen47 does not offer, provide, request or accept any gift, hospitality, payment or other benefit intended to secure, or which could reasonably be perceived as intended to secure, improper influence.

Gifts or hospitality connected with engagement involving elected representatives, public officials, policymakers or other relevant stakeholders must comply with our Anti-Bribery
Policy and our approval and recording requirements.

Gifts or hospitality must never be linked to:

- a request for favourable treatment;
- access to an elected representative, official or decision-maker;
- influence over legislation, regulation, policy or guidance;
- a planning, regulatory, procurement or commercial decision; or
- any other improper advantage.

nineteen47 prohibits bribery, facilitation payments, kickbacks, secret commissions and any other improper financial or non-financial benefit.

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

TRANSPARENCY AND REPORTING

We are committed to being transparent about material lobbying or advocacy undertaken in our name.

Where relevant, we will consider publicly reporting:

- the policy or issue concerned;
- the position adopted by nineteen47;
- the type of public body or decision-maker engaged;
- any trade association or third party representing our position; and
- any related political contribution or material expenditure.

Where no material lobbying, advocacy or political contributions have taken place during the relevant reporting period, we may publish a statement confirming this.

Any disclosure will be proportionate and will take account of client confidentiality, contractual obligations, data protection and other legal requirements.

GOVERNANCE AND REVIEW

This policy is approved by the nineteen47 Board of Directors.

We will review it annually, or sooner if:

- we begin material lobbying or advocacy activity;
- we appoint a lobbyist, consultant or other intermediary;
- there is a significant change in our professional or industry memberships;
- a conflict with the position of a membership organisation is identified;
- relevant B Corp standards or legal requirements change; or
- the nature of our business changes significantly.

Approved by: Board of Directors
Effective from: 3.11.26
Last reviewed: 3.11.26
Next review date: 3.11.27
Version: 1.0