



# RESPONSIBLE LOBBYING POLICY

Version 1.0



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# RESPONSIBLE LOBBYING POLICY



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## 1. Policy statement

Intrepid Travel ("Intrepid") is a certified B Corp and a global purpose-led travel business.

Intrepid engages in public policy, advocacy, and lobbying activities only where such engagement supports positive social, environmental, and economic outcomes and aligns with our purpose, values, impact principles and impact strategy.

Four primary drivers inform our lobbying approach:

1. Our mission is to create positive change through the joy of travel. We believe in working collaboratively with communities, governments and other organisations to influence positive social and economic impact in destinations where we operate.
2. The Public Benefit Corporation legal requirement to publicly claim and contribute to a positive impact on society and the environment.
3. Requirements outlined by B Corp certification standards.
4. Our legacy of advocacy and action on issues including climate change, animal welfare and human rights.

This Responsible Lobbying Policy sets out the principles, governance, and requirements that apply to lobbying and public policy engagement undertaken by Intrepid, directly or indirectly, to ensure transparency, integrity, and accountability.

## 2. Scope

This Policy applies to:

- All Intrepid Travel entities globally
- Directors, officers and team members acting on behalf of Intrepid
- All forms of lobbying, advocacy, and public policy engagement, including:
  - Direct engagement with governments, regulators, and policymakers
  - Participation in consultations and inquiries
  - Engagement through intermediary organisations, including industry associations and coalitions.

## 3. Principles of responsible lobbying

Lobbying and advocacy undertaken by Intrepid must comply with the following principles:

### 3.1. Alignment with Purpose

Lobbying positions must be consistent with Intrepid's mission, purpose, social and sustainability commitments, and long-term strategy as a responsible business and certified B Corp.

### 3.2. Public Interest

Intrepid advocates for policies that contribute to positive outcomes for society and the environment, including climate action, responsible business practices, human rights, decent work, and sustainable tourism.

### 3.3. Transparency

Intrepid commits to transparency regarding its lobbying activities, positions, and political

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engagement, including public disclosure on an annual basis in its Integrated Annual Report.

## 3.4. Integrity and Ethics

Intrepid engages honestly, respectfully, and lawfully with public officials and does not seek to exert undue or improper influence. Intrepid's Anti-Corruption and Bribery Policy outlines our commitment and approach to preventing corruption in all forms.

## 3.5. Accountability

Intrepid's Core Management Team (CMT) maintains oversight of lobbying conducted on its behalf and takes responsibility for alignment with this Policy. This Policy forms part of Intrepid's overall governance and control framework, which is overseen by the CMT and Audit and Risk Committee. Grievances can be raised through the Grievance Policy or Whistleblower policy.

## 4. Direct lobbying and public policy engagement

Intrepid may engage directly with governments and policymakers to:

- Share expertise related to responsible travel and tourism
- Advocate for policies aligned with Intrepid's sustainability strategy and public commitments
- Contribute constructively to policy development processes.

All direct lobbying must:

- Be approved through the appropriate CMT member
- Be consistent with this Policy and Intrepid's publicly stated positions

- Must be based on reliable and/or scientific data
- Be documented in line with internal record-keeping requirements.

## 5. Intermediary organisations and industry associations

Where Intrepid participates in lobbying through intermediary organisations, the following requirements apply:

### 5.1. Disclosure

Intrepid will maintain and publicly disclose a list of intermediary organisations, which it is a member or participant, including each organisation's stated objectives and relevant policy positions on social and environmental issues.

This is maintained by Global Corporate Affairs and published publicly in the Integrated Annual Report.

### 5.2. Alignment Assessment

Intrepid will assess the alignment of intermediary organisations' positions with Intrepid's values and impact commitments. Where misalignment is identified, Intrepid will:

- Seek to influence positions from within the organisation
- Publicly clarify Intrepid's own position where appropriate
- Reconsider membership where alignment cannot be achieved.

### 5.3. Oversight and Process

Intrepid will maintain internal documentation that identifies:

- Intermediary organisations that undertake lobbying relevant to Intrepid

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- The nature and scope of their lobbying activities
- How oversight and accountability are exercised.

The relationship owner is responsible for updating this internal documentation, which is reviewed and updated by Global Corporate Affairs on a quarterly basis. If a risk of non-compliance is identified, this will be escalated to the relevant CMT member.

## 6. Political contributions

Intrepid does not make political donations intended to secure unfair advantage or influence.

On an annual basis, Intrepid will publicly disclose:

- Any political contributions made during the fiscal year, or
- A statement confirming that no political contributions were made.

## 7. Disclosure and reporting

Intrepid will publicly report annually on:

- Key lobbying and advocacy positions
- Significant public policy engagements
- Intermediary organisations used for lobbying and their relevant activities
- Political contributions, if any, made during the reporting period.

Disclosure may be made through Intrepid's Integrated Annual Report and/or B Corp reporting processes.

## 8. Governance

Oversight of this Policy is the responsibility of Intrepid's CMT, supported by Corporate Affairs and

other relevant functions (including Purpose and Legal).

This Policy will be:

- Reviewed every two years to ensure alignment with B Corp standards and regulatory requirements
- Updated where necessary to reflect changes in best practice or Intrepid's strategy.

## 9. Alignment with external frameworks

This Policy aligns with:

- B Corp standards for Government Affairs and Collective Action
- UN Global Compact – Responsible Lobbying Framework
- European Sustainability Reporting Standards (ESRS) G1 – Political influence and lobbying activities.

## 10. Breaches

Failure to comply with this Policy may result in corrective action in accordance with Intrepid's internal policies and procedures.

