

Responsible Advocacy Policy

BGF exists to back ambitious entrepreneurs to scale their businesses responsibly, driving growth, innovation, and shared prosperity across every region of the UK and Ireland.

Engaging with policymakers and public bodies helps create the conditions for good growth. We share insight and real-world experience from BGF and our portfolio companies to support a policy environment in which ambitious businesses can start, scale and thrive.

Purpose and Scope

This Policy applies to all BGF entities and to anyone engaging with policymakers on BGF's behalf, including employees, contractors, advisers and industry bodies.

Our engagement is designed to:

- **Educate policymakers** about BGF, our investment model and the real-world experiences of the growth businesses we support; and
- **Contribute constructively** to improving the environment for growth and scaling companies in the UK and Ireland.
- **Purpose-led policy engagement**
We engage on issues that are relevant to BGF's purpose, values and long-term approach, and that support sustainable economic growth.
- **Evidence-based**
Our positions are informed by reliable data, practical experience and, where relevant, credible academic, governmental or industry evidence.
- **Transparent and lawful**
We comply with all applicable laws, regulations and transparency requirements governing public policy engagement in the jurisdictions where we operate.
- **Constructive and responsible**
We seek to engage respectfully and constructively, and we do not advocate for positions that undermine human rights, climate action, social equity or other widely recognised sustainability objectives.

Political Contributions, Anti-Corruption and Intermediaries

BGF does not make direct or indirect financial or in kind contributions to political parties, political campaigns, or individual candidates, unless explicitly allowed by law, transparently recorded, and pre approved in writing by the Chief Executive Officer (CEO) and the Chair of the Board (or their delegates) and reported to the Board. You may be asked to see a record of these contributions as described.

Anti-corruption and bribery

All lobbying and advocacy activity must be in accordance with BGF's Compliance Handbook, and the Anti-Bribery Policy, and Conflicts of Interest Policy. BGF expects all employees, directors, contractors and business partners to uphold these standards and report any concerns through its whistle-blowing channel.

Intermediary organizations

BGF may engage industry associations, trade bodies, public affairs consultants or other intermediaries to represent its views and will conduct due diligence on their lobbying practices and positions on material issues to ensure consistency with this Policy, applicable law and BGF's Anti Bribery and Conflicts of Interest Policy. Their engagement will be reviewed periodically for non-compliance.

Governance and oversight

The Executive Committee approves this Policy and oversees BGF's approach to advocacy and public policy engagement. Day-to-day responsibility and oversight of this Policy sits with the Head of Marketing, with escalation of sensitive matters to the Compliance officer and the COO.

Communication and training

This policy is shared publicly and all employees have access to the current Anti-Bribery Policy via the BGF intranet. The BGF proportionate procedures, training and awareness arrangements are detailed in the Anti-Bribery Policy.

The proportionate procedures include the management of gifts, events, and entertainment, ban on any form of facilitation payments, and donations to political parties.

All employees have access to the current anti-bribery policy and employees are required to attest that they understand the requirements as part of the BGF annual affirmation and training process.

Transparency and review

This Policy is published on BGF's website and reviewed periodically by the Audit & Risk Committee to ensure it remains appropriate and aligned with evolving expectations.