

everdrop GmbH

Responsible Lobbying & Political Engagement Policy

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Approved by: Board of Directors, everdrop GmbH | **Policy owner:** CEO / General Counsel

everdrop GmbH is a Munich-based consumer-goods company on a mission to make sustainable living simple, convenient, and joyful. This policy governs how everdrop engages in lobbying and political activities, ensuring that any such engagement advances — and never undermines — our purpose and our obligations under the B Lab Standards.

1. Purpose and Scope

1.1 Purpose

This policy establishes everdrop's commitment to responsible lobbying: lobbying that creates positive social and/or environmental impact, is grounded in reliable or scientific data, and is consistent with our broader sustainability strategy and impact commitments.

everdrop will only engage in lobbying that contributes to positive outcomes for society or the environment. Our lobbying positions are guided by:

- The B Lab Standards (including the B Lab Standards V2 outcome sections);
- The United Nations Sustainable Development Goals (SDGs), in particular SDGs 12 (Responsible Consumption & Production), 13 (Climate Action), and 17 (Partnerships for the Goals); and
- Relevant EU and German environmental and social legislation and policy frameworks.

everdrop will not directly lobby against these commitments. Should any current or proposed lobbying position be found to conflict with our purpose of contributing to positive social or environmental impact, everdrop will immediately cease or amend that activity.

1.2 Definition of Lobbying

For the purposes of this policy, "lobbying" and "advocacy" are used interchangeably and refer to activities carried out by everdrop or on its behalf that include:

- Communicating directly or indirectly with public officials, policymakers, or their representatives with the aim of influencing public decision-making; and/or

- Seeking to influence public opinion, directly or indirectly, beyond normal advertising and marketing practices, in order to shape public decision-making.

This definition is adapted from Transparency International's Corporate Political Engagement Index. It includes both direct engagement with public actors and indirect efforts to shape public opinion where the ultimate goal is to influence public decision-making (e.g., future regulations). It also explicitly covers indirect lobbying via intermediary organisations such as lobbyists, consultants, trade associations, or chambers of commerce acting on everdrop's behalf.

1.3 Scope

This policy applies to:

- everdrop GmbH and all wholly-owned entities within the scope of B Corp certification;
- All employees, executives, and Board members acting on everdrop's behalf;
- External agencies, consultants, and third-party representatives retained for lobbying or public affairs activities; and
- Trade associations, industry coalitions, and other intermediary organisations of which everdrop is a member and through which lobbying may occur.

2. Evidence-Based Approach

All everdrop lobbying positions must be grounded in reliable or scientific data. We define these standards as follows:

- Reliable data: evidence that is evidence-based and replicable, drawing on insights from independent market research, recognised industry bodies, governmental statistics, or comparable authoritative sources.
- Scientific data: research conducted by scientists and published in reputable peer-reviewed journals, or data endorsed by established scientific bodies such as the IPCC, WHO, or equivalent.

Before taking a lobbying position, the responsible team must document the evidence base, including the data source, date of publication, and relevance to the policy position being advocated. Positions based solely on commercial interest or anecdotal information will not be pursued.

3. Political Contributions and Integrity

3.1 Financial and In-Kind Political Contributions

everdrop does not make financial contributions to political parties, candidates for public office, political action committees, or ballot-measure campaigns. everdrop does not provide in-kind contributions (goods, services, or use of company assets) for political campaign purposes.

Any exception to this rule requires prior written approval from the Board of Directors and must be disclosed publicly in accordance with applicable law and the B Lab Standards.

3.2 Anti-Corruption and Anti-Bribery

everdrop is committed to conducting all lobbying activities with the highest standards of integrity. We comply with all applicable anti-corruption and anti-bribery laws, including the German Criminal Code (StGB §§ 299, 331 ff.), the EU Anti-Corruption Directive, and, where applicable, the UK Bribery Act and the US Foreign Corrupt Practices Act.

The following controls are in place to prevent corruption, bribery, undue influence, and conflicts of interest in our lobbying activities:

- No gifts, hospitality, or other benefits may be offered to, or accepted from, public officials or policymakers beyond a nominal value as defined in our Code of Ethics.
- All lobbying expenditures, including retainer fees paid to external public affairs consultants, must be recorded, approved by the General Counsel, and reported annually.
- Employees involved in lobbying must complete annual training on anti-corruption, conflicts of interest, and responsible political engagement.
- Any employee who identifies a potential conflict of interest or unethical lobbying conduct must report it immediately via the whistleblowing channel described in Section 6.

4. Intermediary Organisations

4.1 Assessment of Alignment

Before joining, renewing membership in, or funding any trade association, industry coalition, chamber of commerce, or other intermediary organisation that engages in lobbying, everdrop will conduct an alignment assessment to determine whether the organisation's known lobbying positions are consistent with this policy.

The alignment assessment will consider, at minimum:

- The organisation's publicly stated lobbying agenda and positions;
- Whether those positions support or conflict with positive social and environmental outcomes;
- Whether those positions are based on reliable or scientific data; and
- Whether membership would associate everdrop with positions that contradict the B Lab Standards or the SDGs.

4.2 Responding to Misalignment

Where everdrop identifies a misalignment between an intermediary organisation's lobbying positions and this policy, we will:

- Engage the organisation directly to understand and, where possible, positively influence its position;
- Where misalignment persists, publish a statement on our website explaining: (a) everdrop's position compared to the organisation's position; (b) the steps we are

taking to influence the organisation; and (c) our "red lines" — the circumstances that would cause us to terminate the relationship.

- Abstain from votes or decisions within the organisation that would require us to endorse a position contrary to this policy.

4.3 Red Lines

everdrop will terminate its membership in or funding of an intermediary organisation if that organisation:

- Lobbies against action on climate change or environmental protection in a manner directly contrary to the SDGs or the Paris Agreement;
- Opposes measures designed to protect workers' rights, living wages, or safe working conditions;
- Promotes positions that discriminate on the basis of race, gender, sexual orientation, disability, or other protected characteristics; or
- Engages in lobbying practices that violate applicable anti-corruption laws or the B Lab Standards.

Before terminating a relationship on red-line grounds, the CEO and General Counsel will review the situation and the decision will be documented. Termination will be announced publicly where relevant to our stakeholders.

5. Governance, Controls, and Risk Management

5.1 Accountability

The Board of Directors ("Board") holds ultimate accountability for this policy and its outcomes. Day-to-day responsibility for implementing the policy is delegated to the CEO, who may further delegate operational management to the General Counsel or a designated Public Affairs Lead.

5.2 Approval and Review

This policy was approved by the Board of Directors prior to everdrop's Year 0 B Corp audit. The Board will formally review and re-approve the policy at least once per calendar year, and on an ad hoc basis following any significant change in everdrop's lobbying activities, applicable law, or the B Lab Standards.

Evidence of Board approval (e.g., signed Board minutes or a Board resolution) will be retained and made available to B Lab upon request.

5.3 Embedding and Implementation

The following procedures ensure the policy is embedded throughout everdrop:

- Training: All employees involved in government affairs, public policy, or external relations will receive training on this policy within 30 days of joining and annually thereafter.
- Internal procedures: The General Counsel will maintain an internal lobbying register documenting all active lobbying activities, the responsible employee, the data sources relied upon, and the expected outcomes.

- Approval workflow: Any new lobbying initiative or material change to an existing position must be approved in writing by the General Counsel before commencement.
- Supplier/agency contracts: All contracts with external public affairs consultants will include a clause requiring compliance with this policy and the right of everdrop to terminate the contract in the event of non-compliance.

5.4 Risk Identification and Monitoring

The General Counsel will conduct a bi-annual review of everdrop's lobbying activities and intermediary memberships against this policy. This review will:

- Identify any new or emerging misalignments between everdrop's lobbying activities and its positive-impact commitments;
- Assess changes in law, regulation, or B Lab Standards that may affect this policy;
- Review reported concerns or incidents and confirm they have been appropriately addressed; and
- Report findings and recommendations to the CEO and, where material, to the Board.

5.5 Compliance and Breach Response

Compliance with this policy will be evaluated as part of everdrop's annual governance review. Any identified breach of this policy — including lobbying without prior approval, making prohibited political contributions, or failing to disclose a conflict of interest — must be reported to the General Counsel immediately.

Upon identification of a breach, everdrop will:

- Cease the non-compliant activity immediately;
- Investigate the circumstances and root cause;
- Apply appropriate disciplinary or remedial measures; and
- Update internal procedures to prevent recurrence.

Material breaches will be escalated to the Board and, where required by applicable law or the B Lab Standards, disclosed publicly.

6. Stakeholder Concerns and Grievance Channels

everdrop is committed to transparency in its political engagement. Workers, affected communities, customers, investors, civil-society organisations, and other stakeholders may raise concerns about everdrop's lobbying or political activities at any time.

Concerns may be raised through the following channels:

- Whistleblowing/grievance channel: As described in everdrop's Grievance Procedure (PSG3), stakeholders may submit concerns — including concerns about lobbying or political engagement — via our confidential reporting mechanism. Reports may be made anonymously where permitted by applicable law.
- Direct contact: Concerns may also be directed to the General Counsel by email at [legal@everdrop.de].
- External escalation: Where internal channels are insufficient, stakeholders may escalate concerns to B Lab or to the relevant regulatory authority.

All concerns will be acknowledged within five business days and investigated in accordance with everdrop's Grievance Procedure (PSG3). Outcomes will be communicated to the complainant, to the extent permitted by confidentiality requirements.

7. Transparency and Public Disclosure

everdrop is committed to transparency regarding its political engagement. This policy is published on our website and is accessible to all stakeholders. We will also:

- Publish an annual summary of our significant lobbying activities, the issues on which we have engaged, and the positions we have taken;
- Disclose any lobbying expenditure above the threshold set by applicable German or EU lobbying-register requirements; and
- Publish any position statements required under Section 4.2 of this policy in relation to intermediary-organisation misalignment.

8. Related Documents and Frameworks

- everdrop Code of Ethics
- everdrop Grievance Procedure (PSG3)
- B Lab Standards V2 — GACA 1.1
- UN Sustainable Development Goals (SDGs)
- Transparency International Corporate Political Engagement Index
- EU Lobbying Register / Transparency Register (where applicable)