



Responsible lobbying policy

1. Scope

This policy applies to all employees, directors, and contractors of SEA Water B.V. ('SEA Water'). It covers all activities that may constitute lobbying, whether conducted directly by SEA Water or through third-party intermediaries, industry associations, or coalitions of which SEA Water is a member.

2. Purpose and positioning of policy

SEA Water's mission is to change perception about desalination and accelerate the use cases of renewable-powered, locally produced water. Our work, including thought leadership, public communications, industry engagement and participation in policy discussions, can constitute lobbying under the OECD definition, which covers any direct or indirect communication with public officials intended to influence legislation, policy, or regulatory decisions.

Currently, SEA Water does not conduct formal, direct lobbying with public officials. However, as the company grows and its policy influence expands, this may change. This policy establishes the framework that will govern any such engagement - now and in the future.

3. Our approach to responsible lobbying

SEA Water's position is straightforward; we may lobby, but only when doing so contributes to a positive impact on society and the environment. We will never use lobbying to advance narrow commercial interests at the expense of public good, and we will never engage in activities that contradict our impact commitments.

3.1 Lobbying activities

SEA Water's lobbying activities may include, but are not limited to;

- Publicly advocating for stronger plastic reduction regulations and extended producer responsibility frameworks



- Contributing to policy discussions on sustainable water infrastructure, desalination technology, and circular packaging
- Engaging with industry bodies, organisations, or coalitions whose advocacy aligns with our mission
- Participating in formal and informal consultations with public authorities on matters relevant to our sector and business

3.2 Evidence-based lobbying

All lobbying positions taken by SEA Water must be grounded in reliable and/or scientific data. This means:

- Factual claims in lobbying communications must be substantiated by peer-reviewed research, credible third-party data, or independently verified lifecycle assessments
- SEA Water will not advocate for positions that misrepresent scientific consensus or distort evidence
- Where uncertainty exists in the evidence base, we will acknowledge it openly rather than overstate our case

3.3 Transparency

SEA Water is, and will continue to, be open about its lobbying activities. We will:

- Disclose material lobbying in our annual impact report
- Clearly identify SEA Water as the source of any public advocacy or policy submission
- Not obscure the commercial identity behind any campaign we fund or participate in
- Register with relevant lobbying registers where legally required

3.4 Financial and in-kind contributions

SEA Water does not make financial or in-kind contributions to political parties, candidates, elected officials or political campaigns. Neither directly nor indirectly. This applies globally and without exception.



SEA Water does not pay for access to decision-makers or use financial means to secure preferential policy outcomes. Any legitimate hospitality or participation in public events involving public officials must be modest, transparently recorded, and approved in advance by the CEO.

3.5 Anti-corruption and anti-bribery

SEA Water maintains a zero tolerance for corruption and bribery in all forms. No employee, contractor, or agent acting on SEA Water's behalf may offer, give, request, or accept anything of value to improperly influence a business or government decision. This applies to all jurisdictions in which SEA Water operates.

3.6 Lobbying through intermediary organisations

SEA Water may participate in industry associations, coalitions, or multi-stakeholder initiatives whose advocacy touches on policy. Where we do, we will:

- Conduct due diligence before joining any organisation to assess whether its lobbying positions are consistent with this policy
- Annually review the lobbying activities of intermediary organisations of which SEA Water is a member
- Publicly distance ourselves from, or exit, any association whose lobbying positions materially conflict with our commitments or this policy
- Not provide funding to intermediaries for lobbying activities that we would not be permitted to conduct ourselves under this policy

Responsibility for monitoring intermediary alignments sits with the Impact Manager, who will flag conflicts to the Board of Directors ('the Board').

4. Governance, control, and risk management

4.1 Accountability

The SEA Water Board of Directors ('the Board') holds ultimate accountability for this policy and its implementation. Day-to-day operational accountability is held by the CEO, who is responsible for enforcing this policy.



The Impact Manager is responsible for maintaining this policy, monitoring compliance, revising and updating annually, and flagging risks to the Board.

4.2 Approval framework

No employee may engage in lobbying on behalf of SEA Water without completing this approval process:

- Proposal is drafted by the relevant team member, including the proposed position, evidence base, and intended audience
- Impact Manager reviews the proposal for alignment with this policy and SEA Water's commitments
- The Board provides approval for all lobbying activities

4.3 Embedding this policy

This policy is embedded within SEA Water through the following mechanisms:

- Referenced in the Code of Conduct, which is included in onboarding and all employees acknowledge annually
- Covered in ESG training provided to the team annually
- Accessible to all employees on SEA Water's internal document repository
- Published on SEA Water's public website, accessible to all external stakeholders

4.4 Risk identification and monitoring

SEA Water will identify and manage lobbying-related risks through the following practices:

- Annual review of all intermediary organisation memberships against the criteria in Section 3.6
- Pre-engagement review of any new policy engagement opportunity against this policy
- Annual self-assessment by the Impact Manager of compliance with this policy, reported to the Board



- Any material changes to SEA Water lobbying activities or positions are subject to re-approval under Section 4.2

4.5 Evaluating compliance

Compliance with this policy is evaluated through:

- A written compliance review completed by the Impact Manager and submitted to the Board
- Board sign-off on the annual compliance review as part of the policy renewal process
- Disclosure of lobbying activities in SEA Water's annual impact report, enabling external stakeholder scrutiny

5. Raising concern

5.1 Internal escalation

Any employee who is uncertain about whether a planned activity constitutes lobbying, or whether it complies with this policy, should raise the question with the Impact Manager before proceeding. Questions may also be directed to the CEO.

5.2 Concerns about non-compliance

If any employee becomes aware of actual or suspected non-compliance with this policy - whether by a colleague, a manager, or an intermediary organisation - they are encouraged to raise the concern without delay.

5.3 Whistleblower mechanism

SEA Water maintains a whistleblower procedure that allows employees and external parties to report concerns about business conduct, including lobbying-related concerns, confidentially and without fear of retaliation. Details of the reporting mechanism are set out in SEA Water Whistleblower Policy, available [here](#).



6. Policy Governance

Policy owner:	Impact Manager
Executive accountable:	CEO
Governing body:	Board of Directors
Review frequency:	Annual
Next review date:	January 2027
Approved by:	Board of Directors
Date of approval:	July 2026
Version:	1.0