	Responsible Lobbying Policy		Version No 1
			Page 1 of 4
	Developed by:	Group Responsible Business Director Jesper Ambrosius	
	Confirmed by:	Responsible Business Committee	29.10.2025
		Created:	01.10.2025

Responsible Lobbying Policy

Index

1. Responsible lobbying	1
2. Transparency and Disclosure	1
3. Board Member Responsibilities	2
4. Anti-Corruption Principles	2
5. Governance and Accountability	2
6. Grievance & Whistleblowing	2
Annex: Intermediary organization mapping	3

1. Responsible lobbying

Spectre AS does not engage directly in lobbying or political contributions. However, we recognize that our indirect relationships — through board members, owners, and organizational memberships — may connect us to lobbying activities. Connections are provided in the Annex to this Policy: *Intermediary Organization Mapping*.

This policy ensures that all lobbying activities are associated with Spectre AS — whether direct or indirect — align with our purpose to create a positive impact on society and the environment, and comply with the following responsible lobbying principles:

1. Legitimacy – Lobbying must serve the public interest, never narrow self-interest.
2. Transparency – All lobbying-related relationships and activities will be publicly disclosed.
3. Consistency – Our external affiliations must align with our values, commitments, and sustainability goals.
4. Accountability – Clear governance structures ensure responsibility for all direct and indirect lobbying relationships.
5. Opportunity – We will seek collective action with partners to advance social and environmental good.

All lobbying positions Spectre AS supports (directly or indirectly) must be based on reliable evidence and scientific research.

All significant misalignments or disengagement decisions must be reviewed and approved by the Responsible Business Committee and formally documented.


Any new membership or position that may involve lobbying connections must be pre-approved by the Responsible Business Committee to ensure alignment with Spectre AS values and principles. All financial and in-kind contributions connected to such relationships must likewise be reviewed and coordinated with the Committee.

This policy operates in conjunction with our Anti-Corruption & Whistleblower Protection Policy and applies to all executives, board members, and any employees who may be involved in direct or indirect lobbying activities.

2. Transparency and disclosure

To ensure transparency in our relationships with intermediary organizations engaged in lobbying, Spectre AS discloses the following annually in our Responsible Business Report:

- A list of all intermediary organizations where board members, executives, or the company hold positions or memberships that may involve lobbying.

	Responsible Lobbying Policy		Version No 1
			Page 2 of 4
	Developed by:	Group Responsible Business Director Jesper Ambrosius	
	Confirmed by:	Responsible Business Committee	29.10.2025
		Created:	01.10.2025

- The lobbying positions of these organizations on material social and environmental topics.
- In cases of misalignment, our governance protocol is as follows:
 - Publicly disclose the differences in position.
 - Engage with the organization to influence alignment.
 - Decision on disengagement.
- All financial or in-kind contributions related to these organizations.

3. Board member responsibilities

Board members must disclose all external board positions with organizations that engage in lobbying.

When serving on such boards, members must represent Spectre AS values and ensure that lobbying positions do not undermine our commitments.

In cases of conflict between Spectre AS position and that of the lobbying organization, board members must follow the governance protocols outlined in this policy.

4. Anti-Corruption principles

Spectre AS prohibits bribery, facilitation payments, or undue influence in all direct and indirect lobbying activities.

Our existing Anti-Corruption & Whistleblower Protection Policy applies fully to lobbying contexts.

Employees and board members will receive training on corruption risks specific to lobbying and political engagement.

5. Governance and accountability

The Responsible Business Committee approves this policy and makes decisions in cases of inconsistency with Spectre AS values and principles.

The Responsible Business Director is responsible for implementing the policy, monitoring intermediary relationships, and reporting annually.


This policy will be reviewed every two years, or sooner if material changes occur.

6. Grievance & Whistleblowing

Stakeholders may raise concerns about lobbying activities or affiliations via our established whistleblowing and grievance mechanism.

This mechanism applies equally to direct company activities and lobbying positions of intermediary organizations.

All concerns will be investigated promptly and fairly, with protections in place for whistleblowers against retaliation.


	Responsible Lobbying Policy		Version No 1
			Page 3 of 4
	Developed by:	Group Responsible Business Director Jesper Ambrosius	
	Confirmed by:	Responsible Business Committee	29.10.2025
		Created:	01.10.2025

Annex: Intermediary organization mapping

This register is maintained to identify, monitor, and disclose all relationships between Spectre AS, its board members, and intermediary organizations that engage in lobbying. It ensures alignment with our Responsible Lobbying & Anti-Corruption Policy, the B Corp standards, and our mission to create a positive impact.

Intermediary Organizations

Organization name	Type of relationship	Organization overall lobbying topics and positions	Alignment with Spectre values	Actions taken/ participation
Danish Fashion and Textile Association (DM&T)	Board seat held by Jacob Klausen	<p>Dansk Mode & Textil, or DM&T, has been the industry's natural focal point since 1895, and is today a modern industry and employer organization with insight into the everyday lives of its members and the challenges the industry faces. DM&T represents more than 375 companies, which benefit from DM&T's professional advice, inspiration, networking and political work for the industry as well as marketing of the industry. DM&T provides industry-specific and personal advice within HR law, commercial law, CSR, technology and the environment, export, advertising and international trade, digital challenges and trends.</p> <p>DM&T's goal is to be the industry's own and knowledge center, the industry's ambassador and alliance developer.</p> <p>DM&T is a member of several important political forums, including EURATEX, which is the association of fashion and textile associations in Europe.</p> <p>DM&T is part of the Danish Employers' Association and is part of the collective bargaining negotiations.</p> <p>DM&T is a non-profit organization</p>	Aligned	None

	Responsible Lobbying Policy		Version No 1
			Page 4 of 4
	Developed by:	Group Responsible Business Director Jesper Ambrosius	
	Confirmed by:	Responsible Business Committee	29.10.2025
		Created:	01.10.2025

Business Council Herning & Ikast - Brande	Deputy chairman Jesper Klausen	<p>The Business Council Herning & Ikast-Brande is an interest organization for over 800 member companies in Central Jutland. The council works purposefully for development and growth in Central Jutland, more specifically for the municipalities of Herning and Ikast-Brande.</p> <p>The council's efforts are divided into two: 1) A number of free services that are offered and communicated on behalf of Herning Municipality & Ikast-Brande Municipality and 2) Being the spokesperson of the local business community.</p> <p>Through close dialogue with politicians locally, regionally and nationally, the council influence political decision-making processes. This is done to ensure that entrepreneurs in the area have the best possible conditions to establish their own businesses, while the effort done for the more established businesses is to ensure the best possible framework to run a business.</p>	Aligned	None
European Outdoor Group (EOG)	Membership	Sustainability (CSR), environment, chemicals regulation, circular economy, product regulation	Aligned	N/A
Cascale	Membership	Advocacy around sustainable practices in apparel/footwear: Product Environmental Footprint, Ecodesign regulation, corporate sustainability due diligence, transparency, decent work, climate action.	Aligned	N/A

Information on intermediary organizations is gathered and reviewed annually from board member disclosures, membership records, and intermediary websites by Responsible Business director.

Each organization's known lobbying positions are compared with Spectre AS mission, values, and sustainability goals.