

PR024 RESPONSIBLE ADVOCACY PROCEDURE

1 Purpose

ANZRP is committed to conducting all advocacy activities ethically, transparently, lawfully, and in a manner consistent with its purpose, values, Constitution, strategic objectives, and ESG commitments.

ANZRP recognises that engaging with governments, regulators, policymakers, industry associations, and other stakeholders is an important part of advancing effective product stewardship, circular economy outcomes, and environmental sustainability.

The purpose of this procedure is to establish principles governing ANZRP's advocacy activities to ensure they are conducted with integrity and are based on accurate, evidence-based information.

2 Scope

This procedure applies to all of ANZRP and its wholly owned subsidiaries' operations and activities.

3 References

References relevant to this procedure are:

- BLab Standard
- PR001 Risk Management Procedure
- Product Stewardship Plan
- PR017 Whistleblower Procedure

4 Definitions

Advocacy	• Communicating directly or indirectly with public officials, political decision-makers, or representatives to influence public decision-making. • Attempting directly or indirectly to influence public opinion (beyond normal advertising and marketing) with the aim of impacting public decision-making. (Reference: BLab Standard)
Advocacy activities	• Government meetings and briefings. • Parliamentary and regulatory submissions. • Industry roundtables and forums. • Research papers, position statements and thought leadership articles. • Conference presentations and keynote addresses. • Public consultations, media commentary and interviews.
Intermediary	Third party organisations that ANZRP may participate in who conduct public policy advocacy activities, including industry associations, peak bodies, alliances and working groups.

5 Roles and Responsibilities

5.1 BOARD:

- Approve this Procedure and formally review it at least every two years to ensure ongoing relevance and effectiveness, or earlier if required due to legislative or regulatory changes, updates to B Corp requirements, changes to ANZRP's strategic direction or emerging member or stakeholder expectations.

5.2 CHIEF EXECUTIVE OFFICER (CEO):

- Ensure the implementation and enforcement of this Procedure and reporting and procedure variations to the Board.
- Approve significant advocacy activities and report them and any associated risks to the Board.
- Monitor the advocacy practices across the organisation.
- Ensure this Procedure is published on ANZRP's website.

5.3 DIRECTORS AND EMPLOYEES INVOLVED IN ADVOCACY:

- Must comply with this Procedure.
- Ensure that any advocacy submissions or public statements are approved by the CEO or the Board.

6 Policy Statement

ANZRP is committed to conducting all advocacy activities responsibly, ethically, transparently and in accordance with its purpose as a not-for-profit product stewardship organisation.

7 Procedure

7.1 POSITIVE SOCIETAL AND ENVIRONMENTAL IMPACT

ANZRP will only undertake advocacy activities that are intended to contribute positively to the community and/or the environment. Advocacy positions must support one or more of the following objectives:

- Improved environmental outcomes and resource recovery.
- Advancement of circular economy principles.
- Effective and equitable product stewardship.
- Reduction of waste and pollution.
- Improved public policy outcomes relating to sustainability, climate action, resource efficiency or responsible management of electronic products.
- Positive social outcomes associated with environmental stewardship and responsible resource management.

ANZRP will not engage in advocacy activities that seek outcomes contrary to the public interest, environmental protection objectives, members' interests or ANZRP's purpose and values.

7.2 EVIDENCE-BASED ADVOCACY

ANZRP's advocacy positions will be informed by reliable and credible information and, where available and appropriate, scientific evidence.

Policy positions and advocacy activities should be supported by:

- Independent research.
- Scientific studies and assessments.
- Government data and reports.
- Industry data and performance information.
- Operational evidence and program outcomes.
- Expert advice and stakeholder consultation.
- Member input and feedback.

ANZRP will seek to ensure that information provided to policymakers, regulators, stakeholders and the public is accurate, balanced and evidence-based.

7.3 TRANSPARENCY AND INTEGRITY

In its advocacy submissions and public statements regarding policy, ANZRP will ensure transparency and integrity by:

- Disclosing that ANZRP is an approved co-regulatory arrangement and a member-based organisation.
- Ensuring that its policy position is clearly articulated.
- Disclosing any relevant memberships and partnerships.
- Disclosing any conflicts of interest.
- Conduct advocacy honestly, respectfully and professionally.
- Avoid misleading claims, greenwashing or improper inducements.
- Where appropriate, publishing policy submissions, position statements and advocacy priorities on its website or through another suitable public channels.
- Maintain records of significant advocacy activities, public submissions and approved policy positions.

7.4 POLITICAL CONTRIBUTIONS

ANZRP maintains strict political neutrality. ANZRP does not make financial or in-kind contributions to:

- Political parties.
- Political candidates.
- Election campaigns.
- Political fundraising events.

7.5 ANTI-CORRUPTION AND BRIBERY

ANZRP has zero tolerance for bribery, corruption and improper influence. All advocacy activities must comply with ANZRP's Anti-Bribery and Corruption Policy and applicable legislation.

Employees, Directors, contractors and representatives must not:

- Offer, provide or authorise bribes, facilitation payments, improper gifts or benefits to a government official or any other person.
- Not receive gifts, hospitality or other benefits intended to influence ANZRP's advocacy position.
- Seek confidential government information through improper means.
- Engage in conduct that could create an actual, perceived or potential conflict of interest.

Any suspected breach must be reported immediately in accordance with ANZRP's reporting or Whistleblower Procedure.

7.6 RESPONSIBLE ADVOCACY THROUGH INTERMEDIARIES

ANZRP may participate in industry associations, alliances, working groups and other intermediary organisations that engage in public policy advocacy.

Where there are differences in policy positions, ANZRP may engage constructively with the relevant organisation and retain the right to publicly communicate its independent position.

ANZRP will not support or participate in advocacy campaigns, directly or through third-party organisations, that are inconsistent with its commitment to product stewardship, circular economy principles, environmental responsibility or the long-term public interest.

The CEO (or their delegate) will:

- Periodically review the policy positions and advocacy activities of intermediary organisations in which it participates.
- Assess whether those activities align with ANZRP's purpose, values, ESG commitments and responsible advocacy principles.
- Raise concerns where advocacy positions conflict with ANZRP's stated positions or this Policy.
- Reconsider participation, funding or membership where material misalignment exists.
- Require external consultants and representatives engaged by ANZRP to comply with this Policy.

Any intermediary misalignment or material concerns from this process must be raised to the Board.

7.7 GOVERNANCE AND EMBEDDING THIS PROCEDURE WITHIN ANZRP

The steps to be taken when developing advocacy positions are:

1. Member and stakeholder (if appropriate) input is received.
2. Policy position is developed.
3. CEO reviews policy position/submission and feedback is incorporated.
4. Member feedback is requested and received.
5. Policy position/submission is finalised and signed off by the CEO and where the policy position/submission has material strategic, regulatory or reputational issues, then provided to the Board.
6. Board approval is obtained (if applicable).
7. Advocacy activity and reporting takes place.

ANZRP embeds responsible advocacy practices through:

- Board oversight of significant advocacy activities.
- CEO sign off on policy positions and submissions.
- Consultation with members on policy positions and submissions.
- Compliance with related governance policies.
- Employee training and awareness activities where appropriate.
- Documentation and record keeping of significant advocacy engagements.
- Integration of responsible advocacy principles into strategic planning and stakeholder engagement activities via the Product Stewardship Plan.

7.8 RISK MANAGEMENT AND COMPLIANCE MONITORING

The CEO (or their delegate) will identify and assess risks associated with advocacy activities, including:

- Reputational risks (to ANZRP and its Members).
- Regulatory and legal risks.
- Conflicts of interest.
- Misalignment with organisational values.
- Risks associated with intermediaries.

Appropriate controls will then be implemented to mitigate identified risks (refer to PR001 Risk Management Procedure).

The CEO will monitor risks and compliance with this Procedure through:

- Oversight and sign off on all advocacy activities, submissions and public statements.
- Ensuring appropriate consultation with members and stakeholders.
- Consideration of member and stakeholder feedback and complaints.
- Reporting of material compliance matters and complaints to the Board.

Findings may be incorporated into updates to governance practices and this Procedure.

7.9 RAISING CONCERNS AND GRIEVANCES

ANZRP encourages employees, members, stakeholders and other interested parties to raise concerns regarding advocacy practices, ethical conduct or potential non-compliance with this Procedure.

Concerns may be raised through:

- ANZRP's Whistleblower Policy.
- ANZRP's Grievance Procedure (refer to MAN002 Employee Manual).
- Direct communication with the CEO, Chair, Deputy Chair or Company Secretary.

Reports will be handled confidentially and investigated in accordance with ANZRP's procedures.