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Responsible Lobbying Policy and Statement

Our public position on lobbying, political activity and the responsible use of influence

Document owner	Managing Director
Approved by	Board of Directors, 9 November 2026 (highest governing body)
Version / date	Version 1.0, November 2026
Applies to	Twist Health Limited, its directors, employees, freelancers and any agent acting on its behalf
Published at	https://www.twisthealth.tech/about-8
Review	Annually by the Board, and before any lobbying activity begins
Related documents	Anti-Bribery and Corruption Policy 2026; Grievance Policy v1.1

1. Statement: Twist Health does not lobby

Twist Health Limited **does not currently engage in lobbying**. We do not seek to influence legislation, regulation or public policy, directly or through intermediaries; we do not employ or engage lobbyists or public-affairs consultants; we do not make political donations of any kind; and we do not hold political memberships. Our industry memberships (the British Healthcare Business Intelligence Association and the B Corp community) are for professional standards, training and peer learning, not for lobbying.

The Board of Directors has resolved that, should Twist Health ever decide to undertake lobbying or public-policy advocacy, for example on healthcare communication standards, patient health literacy or climate policy, it will do so only in accordance with the policy below, and will update this public statement before any such activity begins.

2. Purpose and scope of this policy

This policy sets the standards that will govern any lobbying by or on behalf of Twist Health. "Lobbying" means any communication with public officials, legislators, regulators or their staff, directly or through intermediaries (including trade associations and consultants), intended to influence legislation, regulation, policy or public funding decisions. It covers all jurisdictions and all people acting for the company.

3. Our responsible lobbying principles

3.1 Lobbying only for positive social or environmental impact

Any lobbying will be undertaken only where it contributes to a positive social or environmental outcome consistent with our Statement of Purpose, the B Lab Standards and the UN Sustainable Development Goals (in particular SDG 3 Good Health and Wellbeing, SDG 10 Reduced Inequalities and SDG 13 Climate Action). We will not lobby to weaken environmental, health, labour, consumer-protection or human rights standards, or purely for private commercial advantage.

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This company meets high standards of social and environmental impact.

3.2 Positions based on reliable or scientific evidence

Any position we advocate will be grounded in reliable, verifiable data, peer-reviewed research, official statistics or independent expert consensus, and will be consistent with our Responsible Marketing & Communications Principles. We will not misrepresent evidence or present opinion as fact.

3.3 No political contributions

Twist Health will not make donations, whether in cash, in kind or by any other means, to political parties, candidates, campaigns or politically-affiliated organisations, in the UK or anywhere else. This is also set out in section 5.9 of our Anti-Bribery and Corruption Policy.

3.4 Integrity, anti-corruption and conflicts of interest

All engagement with public officials is subject to our Anti-Bribery and Corruption Policy: no gifts, hospitality or facilitation payments intended to influence; all gifts and hospitality declared and recorded; conflicts of interest (for example family or financial connections to public officials) disclosed to the Board. We will comply with the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 and register as a consultant lobbyist if ever required.

3.5 Intermediary organisations

Before joining or renewing any trade association, coalition or membership body that lobbies, we will check that its public positions are aligned with this policy and our purpose. If we identify misalignment we will raise it with the organisation, publish our own position where relevant and, if the misalignment cannot be resolved, leave the organisation. We review our memberships annually. Current memberships (BHBIA; B Corp / BHive community) have been reviewed and are aligned.

3.6 Approval, review and transparency

This policy is approved by the Board of Directors and reviewed by the Board **annually** and before any lobbying activity starts. It is published on our website. If we ever lobby, we will publish annually: the issues on which we engaged, the bodies engaged, any intermediaries used and any spend.

4. Governance, controls and risk management

Requirement	How Twist Health meets it
Accountable body / executive (1.1.3a)	The Board of Directors is accountable for this policy; the Managing Director is the executive responsible for its enforcement and is the only person who may authorise any lobbying activity.
Embedding and implementation (1.1.3b)	The policy is referenced in the Employee Handbook (section 7, Ethical Conduct) and the Anti-Bribery and Corruption Policy; all staff are briefed at induction; any proposed lobbying must be submitted to the Board with the evidence base and expected impact before approval.
Identifying, managing and monitoring risks (1.1.3c)	Risks (misalignment with purpose, undue influence, reputational harm, non-compliance with the 2014 Act) are considered by the Board when any lobbying is proposed and at the annual review; a lobbying register will be opened if activity begins; memberships are reviewed annually.

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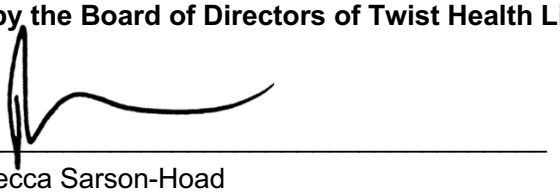
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Requirement	How Twist Health meets it
Evaluating compliance (1.1.3d)	The Board confirms at its annual purpose and impact review that no lobbying has taken place (or reviews the register where it has), and records this in the minutes; any breach is investigated under the Disciplinary Policy.
Stakeholder concerns (1.1.3e)	Anyone can raise a concern about our lobbying or political activity through the Stakeholder Grievance Procedure (Grievance Policy v1.1, Part C), info@twisthealth.tech, without fear of retaliation.

5. Approval and publication

Approved by the Board of Directors of Twist Health Limited, the company's highest governing body, on 9 November 2026 (Board minutes item 8), and published on the Sustainability page of our website.

Approved by the Board of Directors of Twist Health Limited:

Signed: 

Name: Rebecca Sarson-Hoad

Position: Managing Director

Date: 9 November 2026

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