



Domaine de Graux

Responsible Lobbying Policy

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Date developed: May 2025, by the Impact Coordinator (Johanna Delmelle) in coordination with the General Manager (Marie Delvaux).

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1. Purpose & Scope

The Domaine de Graux is not only a farm; it is a place of dialogue, learning, and system transformation. We believe that sustainable food systems require change not only on the land, but also in the policies, narratives, and cultural frameworks that shape how society relates to food, nature, and farming.

This policy governs how we engage in public dialogue, advocacy, and policy influence. It ensures that any action we take to shape opinion or policy is grounded in our mission, anchored in science, and conducted with full transparency and integrity.

This policy applies to all forms of advocacy undertaken by Domaine de Graux, including public communications, participation in coalitions or initiatives, programming, and direct engagement with policymakers or public institutions.

2. Core Principles

1

Mission Alignment

All advocacy activities must be directly connected to our mission: promoting agroecological farming, regenerative food systems, biodiversity, and the health of people and planet. We do not engage in lobbying unrelated to our core purpose.

2

Science-Based

Our positions are grounded in the best available scientific evidence - including peer-reviewed research, recognized frameworks, and the lived expertise of farmers, ecologists, and food system practitioners.

3

Transparency

We are open about who we are, what we stand for, and what we are advocating for. We clearly identify ourselves when engaging in public debate or supporting initiatives, and we do not pursue hidden agendas or undisclosed affiliations.

4

Independence

We do not allow financial relationships - including sponsorships, partnerships, or grants - to compromise the integrity of our advocacy positions. Our voice remains independent.



5

Constructive Dialogue

We engage in public debate with openness and good faith. We welcome disagreement as a driver of better thinking, and we hold space for diverse perspectives - across disciplines, sectors, and political views - without abandoning our own values.

6

Non-Partisanship

We do not endorse political parties, candidates, or electoral campaigns. Our advocacy focuses on issues, policies, and systemic change - not partisan positions.

7

Integrity & Anti-Corruption

We do not offer, give, solicit, or accept bribes, facilitation payments, or other improper inducements in connection with our advocacy, public engagement, or procurement activities. Any gifts or hospitality exchanged with public officials or policymakers must be modest, transparent, and never intended or perceived to influence a decision.

3. How We Engage

Advocacy at Domaine de Graux takes multiple, complementary forms. We understand lobbying broadly: as any deliberate effort to shape public opinion, policy, or practice in support of our mission.

a) Formal Advocacy & Coalition Support

We are not an NGO, hence our role is not to campaign nor to point fingers at others. Our approach is to contribute positively to collective progress.

We support and co-sign initiatives aligned with our mission, such as the EU Soil Manifesto and similar calls to action at regional, national or European level. When we do so, we adopt a constructive and collaborative approach and ensure that:

- The initiative's goals are clearly aligned with our mission and values
- We have reviewed its content and are comfortable being publicly associated with it
- Our support is disclosed openly on our channels

Where we engage through intermediary organizations (trade associations, coalitions, etc), we apply the following controls:

- We consider alignment of an intermediary organization's mission and positions with our own before joining (or renewing) membership.
- Where an intermediary organization we are affiliated with takes a public position that is materially misaligned with our own mission or this policy, we publicly disclose that misalignment on our own communication channels, rather than remaining silently associated with it.
- We do not use intermediary organizations as a means to pursue advocacy positions or tactics that this policy would not permit us to pursue directly.
- We disclose the efforts we have made to positively influence the positions of the intermediary organizations we belong to; not only on cases of misalignment, but on our ongoing contribution to shaping those positions in line with our mission.

**Red lines for ending engagement**

We define the following as circumstances under which we will cease engaging with an intermediary organization whose lobbying positions undermine this policy:

- the organization adopts or maintains a public position that directly contradicts our environmental or social commitments;
- a disclosed material misalignment is not addressed within a reasonable period after we escalate it to the organization's leadership;
- we find evidence that the organization is being used, by any party, to circumvent the commitments in this policy.

Any employee who becomes aware of a potential red-line breach should report it through the channel described under *Raising Concerns* below. Reported breaches are reviewed by the General Manager, who determines, with the Management Committee, whether continued engagement remains appropriate.

b) On-the-Ground Messaging

Domaine de Graux itself is a living argument for a different way of farming and eating. Our signage, tours, publications, and daily communications carry an inherently advocacy dimension - inviting visitors to rethink their relationship with food, land, and nature. We ensure this messaging is:

- Accurate, evidence-based, and free from greenwashing
- Honest about both our achievements and the complexity of the challenges we face
- Accessible and respectful of diverse starting points and backgrounds

c) Programming & Events

Our conferences, workshops, farm visits, and publications bring together farmers, scientists, policymakers, investors, educators, chefs, and citizens. This programming is itself a form of advocacy - creating conditions for cross-sector dialogue and systemic thinking. We are committed to:

- Welcoming diverse actors from across society, including those who may not yet share our views
- Facilitating honest, sometimes uncomfortable conversations about food systems
- Ensuring our programming does not become a platform for misinformation or harmful agendas

d) Direct Engagement with Policymakers

Where relevant, we may engage directly with public institutions, elected officials, or regulatory bodies. In doing so, we:

- Clearly identify ourselves and our affiliation
- Share evidence-based positions and, where appropriate, written briefings

Domaine de Graux does not make financial or in-kind contributions to political parties, candidates, or electoral campaigns, consistent with our Non-Partisanship principle. Company resources (including staff time, the farm venue, products, or funds) may not be used to support partisan political activity of any kind.

4. What We Will Not Do

In order to preserve our credibility and integrity, we commit to the following limits:

- We will not make misleading or unsubstantiated claims in support of our positions
- We will not accept funding from parties whose interests would compromise our advocacy independence
- We will not support initiatives whose values or methods contradict our mission, even if they share some surface-level goals
- We will not engage in advocacy that targets individuals rather than systems, policies, or practices



- We will not represent our positions as more certain than the underlying evidence warrants

Anti-Corruption & Bribery

Domaine de Graux applies a zero-tolerance approach to bribery and corruption in connection with our advocacy and lobbying activities, as well as our broader business dealings.

- We do not offer, promise, give, request, or accept any bribe, kickback, or facilitation payment to or from a public official, policymaker, intermediary organization, or any other party, in order to obtain or retain an improper advantage.
- Gifts, hospitality, or invitations extended to or received from public officials in connection with our advocacy activities must be modest in value, publicly justifiable, occasional, and never tied to a specific decision or vote.
- Any donation, sponsorship, or in-kind contribution made in the context of advocacy must be approved in advance by the General Manager and recorded in our internal register.
- Employees and partners must disclose any actual or potential conflict of interest that could affect the integrity of our advocacy positions.
- Suspected violations must be reported through the channel described under Raising Concerns below, and will be investigated without retaliation against the person raising the concern.

5. Implementation

- Relevant employees (particularly those involved in communications, community relations, or external representation) are briefed on this policy as part of onboarding. This policy is made available to all employees and referenced in relevant internal onboarding and communications materials.
- Any new advocacy engagement, coalition membership, or direct policymaker engagement is submitted for prior sign-off by the General Manager.
- Employees and partners representing Domaine de Graux externally are responsible for applying this policy in their day-to-day interactions and for escalating uncertain cases before proceeding, as described under Raising Concerns below.
- Team members or partners who are uncertain whether a specific action falls within this policy are encouraged to raise it with leadership before proceeding.

Risk Management & Compliance Monitoring

Domaine de Graux manages the risk of non-compliance with this policy through the following process:

- Each engagement is assessed against the Core Principles and the controls in Sections 3 and 4, considering the likelihood and potential severity of misalignment or reputational harm.
- Where a risk is identified, the engagement is adjusted, escalated to the General Manager, or declined.
- The General Manager keeps the Management Committee informed of advocacy engagements as they arise or whenever a relevant update occurs.
- The Management Committee conducts regular effectiveness review of this governance framework. This review checks whether:
 - advocacy engagements during the period were assessed and approved as described;
 - alignment assessments were carried out before joining intermediary-organization memberships, where required;
 - any concerns raised under Raising Concerns relating to lobbying activity were appropriately handled.

The outcome is documented in a short annual review memo, and used to inform the next policy review.



Raising Concerns

Employees, partners, suppliers, and other stakeholders who have concerns about Domaine de Graux's lobbying or advocacy practices are encouraged to raise them as early as possible.

- Concerns can be raised directly with the General Manager or via our online contact form.
- Employees may also raise concerns about Domaine de Graux's lobbying or advocacy practices with the person of trust, as provided for in the internal and official document “Règlement de Travail” (Work Rules).
- Concerns will be treated confidentially and investigated without retaliation against the person raising them.
- Team members or partners who are uncertain whether a specific action falls within this policy are encouraged to raise it with the General Manager before proceeding.

This process runs alongside, and is documented in, our Grievance Procedure which sets out the full process, timelines, and protections that apply once a concern is raised. It constitutes part of Domaine de Graux's whistleblower protection mechanism, guaranteeing a safe, confidential channel and non-retaliation for anyone raising a concern in good faith, in line with the EU Whistleblower Protection Directive (2019/1937/EU).

6. Accountability & Review

This Responsible Lobbying Policy was approved by Domaine de Graux's Management Committee, the Company's highest governing body, in 2025, and revised in 2026.

Overall accountability for enforcing this policy rests with the General Manager (Marie Delvaux), who acts as the policy's executive owner and is responsible for approving advocacy engagements, political contributions, and intermediary-organization memberships as described above.

This policy is reviewed and re-approved by our governing body annually, or whenever a significant new advocacy engagement or affiliation is considered, whichever comes first.