ETHICAL MARKETING, LOBBYING & COMMUNICATIONS POLICY

PURPOSE

The purpose of this policy is to ensure that all marketing, public relations, lobbying, and communications activities conducted by Lemongrass Marketing are responsible, transparent, and aligned with our organisational purpose. We commit to communicating in a way that reflects our actual practices, considers the interests of all stakeholders, and supports long-term trust. Our goal is to provide genuine value to our audiences and to avoid all misuse of personal data, misleading communication, or unethical lobbying practices.

SCOPE

This policy covers all marketing, public relations, lobbying, and communications campaigns created by or on behalf of Lemongrass Marketing, including but not limited to:

- Social media
- Digital media
- Print media
- Tradeshows
- Public policy advocacy and lobbying
- All other forms of promotion or external communications to customers, suppliers, or stakeholders

The scope also encompasses:

- Claims about our social, environmental, and operational performance
- Claims about products and services
- Branding and taglines
- Statements about the company's purpose or values
- Communications relating to public policy, collective action, or advocacy

This policy applies to all audiences and must be followed by anyone preparing marketing, public relations, or lobbying activities for the company.

OUR COMMITMENTS

We commit that our company's marketing, communications, and lobbying practices:

- make precise, verifiable, and substantiated claims based on reliable or scientific data
- are proportional to the company's actions

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- accurately reflect their applicable scope and are relevant to our company's impact
- are truthful, transparent, and accountable about the social and environmental impacts of our company's operations, both positive and negative.
- follow ethical guidelines when using sensitive marketing and public relations channels and practices
- use language that is understandable and clear, matches the general knowledge level of consumers, and available in prevalent languages or forms relevant to stakeholders where the company operates.

We will ensure honesty in all marketing campaigns. We will never use dishonest marketing tactics such as false advertising, manipulated testimonials, fake reviews, misleading data presentation, or inflated results. We will not cherry-pick data points that are unrepresentative of our overall impact.

Where negative results, challenges, or unintended impacts exist, we will communicate these openly to maintain a truthful brand image.

We will only use words that are realistic descriptors of our services and will only make claims on our services that are supported by evidence and acceptable within the **EU Green Claims directive**.

When working with third parties, such as agencies, influencers, consultants, or content creators, we will ensure that all produced content meets the standards set out in this policy.

We will ensure that all services will be created in line with PR Regulations and guidance from the **CIPR code of conduct** (Chartered Institute of Public Relations).

SOCIAL AND ENVIRONMENTAL CAUSES

We will ensure that our social media marketing includes a programme of activity that supports the social and environmental causes that the business chooses to focus upon each year. This will ensure the promotion of our activities in these areas in line with the commitments within this policy to ensure this is authentic and intended for good.

DIVERSITY AND INCLUSION

We recognise that complex issues have multiple causes and solutions. In our marketing and communications, we commit to seeking various perspectives and designing campaigns that reflect a respectful understanding of the issues involved.

1. Language and Terminology

To ensure respectful and inclusive communications, the following terms and phrases should not be used, including but not limited to:

- **Avoid**: derogatory, stereotypical, or offensive language relating to race, ethnicity, gender, sexual orientation, disability, or religion
- **Avoid**: terms that exaggerate or misrepresent impact, such as “miracle,” “perfect,” or “guaranteed results” when not supported by evidence
- **Avoid**: jargon or overly technical language that may confuse audiences
- **Avoid**: emotionally manipulative language that exploits vulnerable groups

Instead, the guide encourages **preferred language**, such as:

- Using neutral, respectful descriptors (e.g., “people with disabilities” rather than “the disabled”)
- Using evidence-based language to describe products or impact (e.g., “based on verified data” rather than “proven to cure”)
- Framing achievements factually and transparently

2. Gathering, Managing, and Using Content Ethically

Content must be:

- **Sourced responsibly**: only using materials that the company has rights to, including images, videos, or quotes; obtain explicit permissions when required
- **Verified for accuracy**: all claims, statistics, and external references must be fact-checked against credible sources
- **Culturally and socially appropriate**: content should be reviewed for potential biases, stereotypes, or offensive material
- **Managed securely**: store content responsibly, respecting privacy and data protection requirements
- **Reviewed internally**: before publishing, content must be approved according to internal processes to ensure compliance with this policy

3. Representation of Social Identities

- Ensure that individuals and communities are portrayed respectfully, avoiding stereotypes or exploitation
- Represent diversity accurately in imagery, storytelling, and campaigns, reflecting a wide range of perspectives and experiences
- Seek stakeholder feedback on potentially sensitive topics before publishing

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4. Artificial Intelligence Use

- At Lemongrass Marketing we have an AI policy that outlines appropriate use of AI in the company and outlines our process of reviewing and knowing where it is deployed across the business.
- Our AI policy also defines where AI cannot be used and outlines our formalised review of AI outputs.
- All AI-generated content must be reviewed by an employee before publication to ensure accuracy, fairness, and alignment with company values
- AI outputs must not be used to misrepresent individuals, exaggerate claims, or generate content that could be offensive or misleading
- Employees must share how AI tools are being used in company and AI task force meetings, including source prompts and checks applied

By following these principles, Lemongrass Marketing ensures that all communications - written, visual, or AI-generated - are ethical, inclusive, transparent, and aligned with organisational values.

PERMISSION-BASED EMAIL MARKETING AND SEO
We will ensure that all email marketing adheres to permission-based, GDPR practices, meaning messages are only sent to individuals who have expressly opted in. All communications will be compliant with privacy regulations, respectful of the intent of the original consent, valuable and relevant to recipients, and accompanied by simple and effective opt-out tools.

To ensure the ethics of our SEO practices, we will not knowingly:

- Purchase links from other websites
- Utilise automated link building
- Intentionally hide content or links
- Automate stolen or plagiarised content generation
- Engage in over optimisation of key words
- Engage in misdirection through unethical redirects.

LOBBYING AND PUBLIC POLICY COMMUNICATIONS
At Lemongrass Marketing, we do not engage in any forms of lobbying.

IMPLEMENTATION

- This policy is shared with all workers producing or involved in external communications, marketing, public relations, or lobbying activities

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- Employees are trained regularly on proper language use, ethical sourcing, social identity representation, and AI practices
- Employees are responsible for applying the guide consistently across all campaigns and channels

KEEPING UP TO DATE
We will work with marketing professionals and stakeholders to ensure this policy is updated as the industry evolves. We will review and revise our approach as needed based on feedback from internal teams, customers, and external experts. Concerns or feedback may be directed to 01865237990 / **hr@lemongrassmarketing.com**

ACCOUNTABILITY
The Director of People & Culture is responsible for ensuring that all marketing, communications, and lobbying practices comply with this policy.

APPROVAL

Signature: 

Name: Mirjam Peternek-McCartney

Title: CEO & Founder

Date: 11 / 18 / 2026

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