



Picture Organic Responsible Lobbying Commitment

Our overarching brand statement covering our actions is “**House of Organic Clothing.**” Implicit in our mission is a willingness to promote a greener outdoor clothing industry. While we may be a small brand, we want to use our voice to help reduce the environmental impact of the industry.

Hence, Picture stays indirectly active in public affairs through advocacy, communication and collaboration with partners involved in advocacy toward protecting the outdoors.

This policy explains

- How we define advocacy and lobbying
- The landscape we operate in
- The principles we follow
- Our focus areas and actions.

What is advocacy?

Advocacy refers to directly or indirectly engaging with public officials, political decision-makers, or the public to influence public decision-making. It includes efforts to shape public opinion beyond normal marketing activities to elevate the importance of an issue.

Unlike lobbying, which typically focuses on changing specific legislation, advocacy is broader, aiming to raise awareness, frame issues, and inform policy discussions. Civil society organizations often describe their work with legislators as advocacy, while companies more commonly refer to such activities as lobbying.

The ecosystem we work in

Since we were founded in France and our main market is France, our primary areas of influence are the French national government and the European Union.

Because our offices are in Annecy and Clermont-Ferrand, we also engage with relevant local governments and associations.

The principles that we follow

1. Act in the public interest

Responsible lobbying prioritizes the wider public interest, not only the organisation's narrow goals. It must respect the rights and needs of people, communities, and the environment, and support fair and equitable participation in public decision-making.

2. Be evidence-based and truthful

Lobbying should contribute to informed, evidence-based policymaking. Organisations must provide accurate, complete, and truthful information, grounded in independent and peer-reviewed science, and avoid misleading or deceptive influence.

3. Uphold integrity, transparency, and accountability

Responsible lobbying requires openness about objectives, positions, and actors involved. Organisations and their representatives should be accountable to stakeholders for their lobbying practices and avoid undue influence, covert activity, or manipulation of public officials.

4. Ensure consistency between values and public positions

Lobbying activities must align with the organization's stated values, commitments, professional codes, and public positions. Activities must avoid contradictions between external advocacy and internal behavior.

5. Promote fair and ethical influence practices

Organizations should promote equitable access to decision-makers, coordinate with others where shared issues serve the public interest, and follow clear rules on gifts, donations, conflicts of interest, and revolving-door risks to maintain trust in policymaking processes.

If anyone believes that these principles are not being followed, it is possible to raise concerns through the [contact form](#) on the website. If we believe that someone directly working for or hired by Picture is not complying with these principles and this policy, then the following procedures will occur:

1. A claim must be submitted through the website or directly to the relevant team member.
2. The claim will be investigated by a member from the Sustainability team, the legal team and the marketing team. The claim will be investigated against the following criteria:
 - a. Does it comply with the French and EU legislations?
 - b. Did it involve bribery?
 - c. Did it involve conflict of interests?
 - d. Was the activity disclosed to Picture?
 - e. Was the activity consistent with the guidance set out in this policy?
 - f. Was the activity aligned with Picture's commitment?
 - g. Was the activity properly followed by Picture?
 - h. Did the activity result in harm to people?
 - i. Did the activity result in harm to the company's reputation?
3. Based on the investigation, the appropriate actions/repercussions will be taken.

Our areas & actions

Aligned with our mission and identity as a brand, we focus on the following areas:

- Climate
- Protection of natural spaces
- Reducing the environmental impact of outdoor clothing

We are committed to

- **GACA 2.3b: Contributing to external research**
- **GACA 2.3c: Collaborating with multiple stakeholders**

Who enacts these commitments?

Responsibility for advocacy and lobbying is not limited to one employee. It is distributed across the company. Ultimately, the accountability lies with the employee's manager or the CEO of Picture. Compliance with this policy is reviewed annually by COPIL. Findings are reported to this group.

For example:

- If the activity involves external research on environmental impacts, the sustainability manager or head of products may lead.

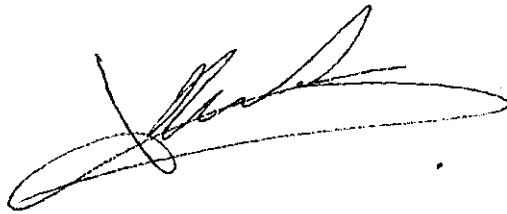
- If Picture is asked to present an innovation to a member of the French Parliament, a co-founder may be the most suitable representative, given the influence their role carries.

We do not work alone. Our actions are informed by our network. To be transparent, the organizations we collaborate with include:

- Outdoor Sport Valley
- Protect Our Winters France, Switzerland, and Europe
- Marge Sauvage association, to protect the post-glacier ecosystems

Annecy, Monday, May 18

Julien Durant, CEO

A handwritten signature in black ink, appearing to read 'Julien Durant', with a large, sweeping flourish underneath.