



## **Responsible Lobbying & Political Engagement Policy** Blaze Partners Holding Co. 2026

### **1. Purpose**

This policy sets out how Blaze approaches lobbying and political engagement — whether conducted on its own behalf or on behalf of clients — so that any such activity contributes to positive social and environmental outcomes and remains consistent with our commitments as a B Corp. It is intended to satisfy the requirements of the B Lab Standards (GACA1.1).

### **2. Scope**

This policy applies to:

- Blaze’s own political engagement and advocacy, including the positions Blaze takes and the leadership roles its owners and staff hold in industry and sector organizations; and
- Advocacy, public-affairs, and communications work that Blaze performs on behalf of clients where the purpose is to influence public decision-making or public opinion.

It covers Blaze’s activities in Maine, the broader New England region, and the United States, and applies to all employee-owners, contractors, and any intermediaries acting on Blaze’s behalf.

### **3. Our Commitment to Responsible Lobbying (1.1.2a)**

Blaze engages in lobbying or advocacy only where doing so contributes to a positive impact on either society, the environment, our employees, and/or our business. Our advocacy is guided by our values, and this policy is informed by the B Lab Standards and the United Nations Sustainable Development Goals (SDGs).

Examples of the positive-impact advocacy Blaze has supported include work to strengthen Maine’s outdoor recreation economy through Maine Outdoor Brands (MOB); support for the 2024 Maine Trails Bond — a first-of-its-kind \$30 million

voter-approved investment in the design, maintenance, and accessibility of trails statewide; and trail- and outdoor-access funding initiatives with Portland Trails.

This policy does not prohibit Blaze from undertaking other lobbying or advocacy activities, provided that they do not undermine these positive-impact commitments.

#### **4. What We Mean by Lobbying**

Consistent with the B Lab Standards, which adapt the definition used in Transparency International's Corporate Political Engagement Index, Blaze treats "lobbying" and "advocacy" as interchangeable terms describing activities carried out by, or on behalf of, an organized group that:

- communicate, directly or indirectly, with public officials, policymakers, or their representatives with the aim of influencing public decision-making; and/or
- seek to influence public opinion, directly or indirectly and beyond normal advertising and marketing practice, in order to shape public decision-making.

This includes indirect lobbying conducted through intermediary organizations such as trade associations, consultants, or industry groups.

#### **5. Evidence-Based Approach (1.1.2b)**

Blaze bases its advocacy positions on reliable or scientific data. In practice, this means drawing on sources such as U.S. government data (for example, the U.S. Bureau of Economic Analysis Outdoor Recreation Satellite Account), peer-reviewed research, recognized standards, and reputable public datasets. Blaze does not advance advocacy claims that it cannot substantiate.

#### **6. Political Contributions & Integrity(1.1.2c-d)**

**Monetary contributions.** Blaze does not make monetary political contributions of any kind. This includes donations to candidates, political parties, political action committees (PACs), or ballot-measure committees.

**In-kind contributions.** Blaze may contribute in-kind support — donated professional time and expertise — to advocacy efforts that advance positive social or environmental impact consistent with the B Lab Standards and the SDGs (Blaze's pro bono support for the Maine Trails Bond is an example). All in-kind contributions must be reviewed and approved by Blaze's leadership team before Blaze commits to them.

**Anti-corruption and integrity.** Blaze maintains zero tolerance for corruption, bribery, and improper influence. No owner-employee, or contractor may offer,

give, solicit, or accept any payment, gift, or advantage intended to improperly influence a public official or decision-maker, or to secure an unfair advantage in any political or lobbying activity. Conflicts of interest must be disclosed to leadership.

## **7. Work Conducted on Behalf of Clients**

Because Blaze's services include communications and public-affairs work, Blaze applies this policy to client engagements that meet the definition of lobbying or advocacy set out in Section 4. Before accepting or continuing such work, Blaze assesses whether the engagement is consistent with its positive-impact commitments, drawing on the same client- and project-screening process Blaze applies under its human rights and environmental due-diligence requirements. Blaze will decline, modify, or end advocacy work that would undermine its commitments under this policy.

## **8. Intermediary Organizations (1.1.2e)**

Blaze participates in and supports intermediary organizations whose work can involve advocacy, including:

- **Maine Outdoor Brands (MOB)** — which Blaze founded in 2017 and where Blaze owners have held, or currently hold, board leadership roles;
- **Running Industry Diversity Coalition (RIDC)** — which Blaze supports through in-kind work; and
- **Maine Ad + Design** — an industry trade association of which Blaze is a member.

Blaze reviews the advocacy positions of these organizations for alignment with this policy. Where Blaze holds a governance or leadership role (as it does with MOB), Blaze uses that influence to help keep the organization's positions consistent with positive social and environmental impact. Where Blaze is a member or supporter without a governance role, Blaze monitors the organization's public positions and, in the event of misalignment, will raise its concerns, may publish its own position, and may decline to participate in the misaligned activity.

**Red line.** Blaze will end its relationship with an intermediary organization where that organization's positions or conduct conflict with Blaze's values or the interests of a key stakeholder group, and the misalignment cannot be resolved.

## **9. Governance, Controls & Risk Management (1.1.3a-d)**

- **Accountability.** Blaze's leadership team is accountable for this policy. Day-to-day responsibility for its implementation and oversight rests with

Jenna Klein Jonsson, Managing Director, the leadership team member responsible for Blaze's B Corp certification.

- **Implementation.** This policy is communicated to all employee-owners, and relevant contractors. Decisions on Blaze's own advocacy positions, in-kind contributions, and qualifying client engagements are reviewed and approved by the leadership team.
- **Monitoring and non-compliance.** The accountable leader monitors compliance, maintains records of advocacy activities and in-kind contributions, and addresses any breach. Suspected non-compliance is investigated by the leadership team, which determines and documents appropriate corrective action.
- **Risk management.** Blaze identifies and manages the risk that its advocacy — or that of intermediaries acting on its behalf — could conflict with its impact commitments, through the screening, review, and red-line provisions above.

## 10. Raising Concerns (1.1.3e)

Any stakeholder — including workers, clients, suppliers, investors, community members, or civil-society organizations — may raise a concern about Blaze's lobbying or political engagement through Blaze's [contact form](#), by selecting the option "I have a concern". Concerns may be raised confidentially, and Blaze does not tolerate retaliation against anyone who raises a concern in good faith.

## 11. Approval & Review (1.1.2f, 1.1.4)

This policy was approved by Blaze's leadership team, which serves as the company's highest governing body for its B Corp commitments. The policy is published on [Blaze's website \(B Corp Page\)](#) in a location accessible to all stakeholders. Blaze reviews and updates this policy at least annually.

Approved by: Jenna Klein Jonsson, Managing Director

Date: June 6, 2026

Next review: June 6, 2027