Gamban

Responsible Lobbying and Campaigning Policy

Version 1.0 · Approved by the board on 18 November 2026 · Reviewed every year at our board review

1. Purpose and scope

This policy sets out how Gamban engages with government, regulators, policymakers and the public on public policy, directly or through others. It applies to directors, staff, contractors and anyone acting for Gamban.

2. What we mean by lobbying and campaigning

Any activity that aims to influence public policy, law or regulation. This includes responding to consultations, meeting or writing to officials, MPs or regulators, and campaigns that ask the public to contact their elected representatives (for example Gamban4Greyhounds).

Tenders, bids and contract negotiations with public bodies are commercial activity, not lobbying. They are covered by the Anti-Bribery and Corruption Policy.

3. Our commitments

3.1 Positive impact only

We lobby and campaign only to reduce gambling harm and protect people at risk, so that our work contributes to a positive impact on society. We check each position against UN Sustainable Development Goal 3 (good health and well-being, in particular target 3.4 on mental health) and the outcomes in the B Lab Standard. We never lobby for commercial advantage at the expense of society or the environment, and never against our purpose.

3.2 Evidence

Our positions are based on reliable data (evidence-based, replicable and using independent research), scientific data (research published in peer-reviewed journals) where it exists, and anonymised, aggregate product data. We never use personal data to support a position.

3.3 Political contributions

Gamban makes no political donations or contributions of any kind, financial or in kind, to any political party, candidate or election campaign (Anti-Bribery and Corruption Policy, section 8). We may fund campaigns, or contract organisations such as public affairs consultancies, to carry out advocacy that reduces gambling harm. If anyone at Gamban has a personal interest in an organisation we pay, they declare it and do not approve the payment. Each payment is approved by the CEO, recorded in our accounts as the Anti-Bribery and Corruption Policy (section 8) requires, and logged in the Policy Advocacy and Collective Action Record (BC-12).

3.4 Anti-bribery and corruption

All engagement follows the Anti-Bribery and Corruption Policy. Nothing of value is offered to influence a decision, and any gift or hospitality involving a public official needs the CEO's written approval in advance.

3.5 Working with intermediaries

We only work with or through organisations (trade bodies, coalitions, charities or campaign partners) whose public positions are consistent with this policy. We review each one at least once a year. Our current coalitions

are Greyhound Freedom UK and the Coalition to End Gambling Ads. We may also pay specialist organisations, such as a public affairs consultancy, to carry out campaign work for us; they follow this policy too.

If an intermediary takes a position that undermines this policy, we publicly report our position compared with theirs, how we are trying to change their position, and our red lines. Our red lines are: an intermediary lobbying to weaken protections against gambling harm; an intermediary funded or directed by gambling operators in a way that conflicts with our purpose; or an intermediary refusing to correct a position that conflicts with this policy. If a red line is crossed, we stop working with them.

3.6 Approval and review

The board approves this policy and reviews it at least once a year at the yearly board review.

4. Governance and control

Area	How it works
Accountability	The CEO is accountable for enforcing this policy and signs off every public policy position before it is shared.
How it is embedded	Shared with all staff on Slack and in onboarding. Anyone planning to contact officials or run a campaign tells the GRC lead first. Positions are written down and approved before use.
Managing risk	The GRC lead keeps a lobbying and campaigning log (the Policy Advocacy and Collective Action Record, BC-12): date, who, topic, position, evidence used, intermediaries involved and approval. Risks of non-compliance (an unapproved position, a conflict with an intermediary, a political contribution) are recorded in the QMS Risk Register (QMS-010).
Checking compliance	The GRC lead checks the log against this policy every quarter. The board reviews the log and the year's activity at the yearly board review (PSG 5.1), and we report it publicly on our "Our commitments" page.
Raising concerns	Anyone can raise a concern about our lobbying or business conduct through our complaints procedure (Complaint Handling Policy, QMS-008): raise a ticket at gamban.com/contact or email info@gamban.com. Staff and contractors can also use the Whistleblowing Policy. Breaches are handled under the disciplinary procedure.

5. Our current activity

- Ending greyhound racing: Gamban4Greyhounds (gamban4greyhounds.com) helps members of the public write to their MP, and we are part of the Greyhound Freedom UK coalition.
- Adult Gaming Centres: videos and posts on the harms of Adult Gaming Centres on high streets.
- Ending gambling advertising: we are a member of the Coalition to End Gambling Ads and have joined parliamentary events of the APPG on Gambling Reform.
- Gambling reform: we fund policy and campaign work that presses government and regulators to protect people at risk of gambling harm, for example through a statutory levy, stake limits on online slots and higher gambling taxes.
- Sharing our evidence on gambling harm with public health bodies and regulators.

Dates, reach and approvals for each are kept in the Policy Advocacy and Collective Action Record (BC-12) and reported at the yearly board review.

6. Publication

This policy is published on the "Our commitments" page at gamban.com.

7. Related documents

- Anti-Bribery and Corruption Policy
- Complaint Handling Policy (QMS-008)
- Whistleblowing Policy (Employee Handbook)
- QMS Risk Register (QMS-010)
- Policy Advocacy and Collective Action Record 2026 (BC-12)
