

Midnight Communications Limited

Responsible Business & Government Affairs Policy

Approved by the Board of Directors | April 2026 | Review date: April 2027

Our purpose and this policy

Midnight Communications exists to make responsible business more visible and more valued, building the reputations of organisations that are genuinely trying to do better, and using our own platform as a B Corp to raise the standard for ethical practice in the PR industry. This policy sets out how we conduct ourselves in relation to government affairs, lobbying, political engagement and collective action, in a manner consistent with that purpose and our B Corp certification.

Client selection

We actively seek out and prioritise clients whose work contributes positively to society, the environment or professional life. We do not work with clients whose activities cause demonstrable harm to people, communities or the planet. This filter is applied at the point of new business and reviewed annually for existing clients. Responsibility for client selection decisions sits with the joint managing directors and is reviewed by the board.

Lobbying and political engagement

Midnight does not currently engage in lobbying as defined by B Lab's GACA standards - that is, we do not directly or indirectly communicate with public officials or policymakers to influence public decision-making, nor do we seek to influence public opinion beyond normal marketing and communications practices.

Should we engage in lobbying or advocacy in future, we commit that any such activity will:

- Be undertaken only to advance positive social, environmental or governance outcomes
- Be grounded in credible evidence rather than commercial self-interest
- Be consistent with our purpose, our B Corp values and the UN Sustainable Development Goals
- Never support policies that contradict our commitments on climate, human rights, equity or responsible business
- Be approved in advance by the board
- Be publicly disclosed

An example of the kind of advocacy we would consider appropriate: engaging with our local MP - who holds the role of Secretary of State for Business & Trade - in support of B Lab

UK's Better Business Act campaign, which seeks to require all UK companies to consider the interests of people, planet and wider society, not just shareholders.

We make no political donations and do not fund political campaigns or parties.

Trade associations and intermediary networks

We are certified by B Lab UK and are active participants in the B Corp community.

Midnight is a member of B Local Sussex, Brighton Chamber of Commerce and Gatwick Diamond Business. We review these memberships annually to ensure their activities remain consistent with our values. Where a material misalignment arises, we will raise it directly with the organisation and, if unresolved, consider whether continued membership is appropriate.

B Local Sussex is particularly relevant - it's the local B Corp community network, which directly supports our collective action commitments and our engagement with the responsible business movement in our region.

Collective action

We believe that systems change requires collective effort. As a B Corp we commit to actively participating in the responsible business community, including:

- Supporting B Lab UK's work to advance the Better Business Act and responsible business legislation
- Sharing our knowledge and experience with other businesses pursuing B Corp certification or responsible business practices
- Contributing to industry conversations about ethical standards in PR and communications
- Mentoring other businesses and participating in B Corp community events and initiatives

Responsible communications

As a PR agency, our own communications practices are subject to the same standards we hold our clients to. We commit to:

- Making only evidence-based claims about our own impact and performance
- Never overstating our sustainability credentials or those of our clients
- Being transparent about both our achievements and areas where we are still improving
- Ensuring our marketing and thought leadership reflects our genuine values, not just our commercial interests

Governance and review

This policy is owned by the joint managing directors and reviewed annually by the board. Any proposed lobbying or political engagement activity must be approved by the board

before it proceeds. Stakeholders who have concerns about our conduct in relation to this policy may raise them through our [grievance procedure](#).