

Lobbying Policy

1. Purpose

Harbinger Law Inc. (“Harbinger”) is committed to conducting all lobbying, advocacy and government relations activities responsibly, transparently and ethically.

This Policy establishes the principles and procedures that apply whenever Harbinger engages in lobbying or advocacy activities or participates in organizations that engage in lobbying on Harbinger’s behalf.

Harbinger recognizes that responsible lobbying can play an important role in contributing to positive social, environmental and economic outcomes. Harbinger is committed to ensuring that any lobbying or advocacy it undertakes is consistent with:

- Harbinger’s values and purpose;
- Nova Scotia Barristers' Society, *Code of Professional Conduct*, (Halifax: Nova Scotia Barristers' Society, 2011) ch 3, r 3.1-1, and any successor thereto;
- Canada’s *Lobbying Act*, RSC 1985, c 44 (4th Supp), any successor thereto, and any regulations made thereunder;
- Nova Scotia’s *Lobbyists' Registration Act*, SNS 2001, c 34, any successor thereto, and any regulations made thereunder;
- The B Lab Standards;
- The United Nations Sustainable Development Goals, where relevant; and
- This Policy.

2. Scope

This Policy applies to:

- All partners, lawyers, articled clerks, students, employees and contractors of Harbinger;
- Any consultant, advisor or lobbyist retained by Harbinger;
- Any lobbying or advocacy undertaken directly by Harbinger; and
- Any lobbying carried out indirectly through intermediary organizations on behalf of Harbinger.

This Policy applies to activities at the federal, provincial and municipal orders and in any other jurisdiction in which Harbinger undertakes lobbying or advocacy activities.

3. What Is Lobbying?

In simple terms, lobbying means communicating with government decision-makers, or trying to influence public opinion, with the goal of influencing public decision-making.

Lobbying may include:

- Meeting with government officials;
- Writing letters or emails to elected officials;
- Participating in policy consultations;
- Advocating for changes to legislation or regulations;
- Requesting government funding or support;
- Supporting public campaigns intended to influence government decisions; or
- Working through professional associations, industry groups, chambers of commerce or other organizations to influence public policy.

Harbinger recognizes that lobbying may occur both directly and indirectly. Indirect lobbying includes activities undertaken through professional associations, business organizations, advocacy coalitions, industry associations, external consultants and retained lobbyists.

Not all communications with government officials constitute lobbying. Providing legal advice, appearing before courts or tribunals, responding to government requests for information, or participating in routine administrative processes may not constitute lobbying depending on the circumstances and applicable legislation.

4. Commitment to Responsible Lobbying

Harbinger will engage in lobbying only in a manner that:

- Supports positive social and/or environmental outcomes;
- Is consistent with Harbinger's values and impact commitments;
- Respects public processes;
- Supports informed and transparent decision-making; and
- Complies with all applicable laws and professional obligations.

Harbinger will engage in lobbying only where it believes the activity contributes to a positive impact on society, the environment, the administration of justice, access to justice, responsible government decision-making or other legitimate public-interest objectives.

5. Evidence-Based Advocacy

Harbinger is committed to ensuring that its lobbying and advocacy activities are informed by reliable information. When developing lobbying positions Harbinger will, where appropriate, consider:

- Applicable legislation;
- Legal research and analysis;
- Court and tribunal decisions;
- Government publications;
- Academic research;
- Scientific evidence;
- Reputable public data;

- Stakeholder consultation; and
- Professional expertise.

Harbinger will not knowingly provide false, misleading, inaccurate, incomplete or unsubstantiated information to public officials, policymakers, stakeholders or the public. Where the available evidence is uncertain or incomplete, Harbinger will not present a position as conclusively established.

6. Compliance with Lobbying Laws

Harbinger will comply with all lobbying laws that apply to its activities.

6.1 Nova Scotia - Communications with provincial public office holders may be subject to Nova Scotia's *Lobbyists' Registration Act*. The provincial regime may apply to certain paid communications intended to influence legislation, regulations, government policies or programs, grants and other government decisions. It may also apply to certain contract-related communications and meeting arrangements by consultant lobbyists.

6.2 Federal Government - Communications with federal public office holders may be subject to the Canada's *Lobbying Act* and its related requirements. The federal regime has its own definitions, registration requirements, reporting obligations and restrictions.

6.3 Other Jurisdictions - Other provinces, territories and municipalities may maintain their own lobbying regimes. Lawyers and staff must not assume that compliance with one jurisdiction satisfies requirements in another jurisdiction.

6.4 Internal Review - Before anyone engages in lobbying or advocacy on Harbinger's behalf, or provides lobbying services for a client, the person responsible must:

- Notify the leader of Harbinger Law's practice;
- Identify the government body and officials who may be contacted;
- Describe the subject and intended purpose of the communication;
- Assess whether registration or reporting is required;
- Confirm that the activity meets the positive-impact and evidence-based commitments in this Policy;
- Identify any actual, potential or perceived conflicts of interest; and
- Complete any required registration before the activity begins.

7. Political Contributions

Harbinger does not make corporate political contributions. This includes direct or indirect financial or in-kind contributions to:

- Political parties;
- Candidates;
- Leadership contestants;

- Political associations;
- Ballot initiatives; or
- Similar political organizations.

Harbinger resources must not be used to make political contributions. In-kind contributions include providing goods, services, employees' working time, facilities or other resources without fair compensation.

Nothing in this Policy restricts partners or employees from participating in political activities in their personal capacities, provided they comply with applicable law, make it clear that they are not acting on behalf of Harbinger, and do not use Harbinger funds, property, confidential information, branding or working time without prior authorization.

8. Anti-Corruption and Anti-Bribery

Harbinger maintains a zero-tolerance approach to corruption and bribery. No person acting for or on behalf of Harbinger may:

- Offer, promise, authorize, request or accept a bribe;
- Provide anything of value in exchange for favourable governmental treatment;
- Conceal lobbying activities or the interests being advanced;
- Circumvent lobbying registration, procurement, political-financing, conflict-of-interest or ethics requirements;
- Provide information known to be false or misleading; or
- Use another person or organization to undertake activities prohibited by this Policy.

Any gifts or hospitality involving public officials must comply with applicable laws, ethics rules and Harbinger policies and must receive advance approval from the Partners.

9. Intermediary Organizations

Harbinger may participate in organizations that engage in policy development, advocacy or lobbying activities, including professional associations, industry associations, chambers of commerce, business organizations, advocacy coalitions and law-related organizations.

Before supporting lobbying activities through an intermediary organization, Harbinger will consider whether:

- The proposed position is consistent with this Policy;
- The position supports, or does not undermine, positive social or environmental outcomes;
- The position is supported by reliable or scientific data, as appropriate;
- The organization has appropriate integrity and anti-corruption controls; and
- The organization complies with applicable lobbying and political-financing laws.

Harbinger will review relevant lobbying positions taken by material intermediary organizations before supporting a significant lobbying initiative.

If Harbinger identifies a material inconsistency between an organization's lobbying position and this Policy, it may raise concerns, seek clarification, request reconsideration, decline support, publicly state its own position, reduce or suspend involvement, or end the relationship.

Harbinger will not knowingly support lobbying that is unlawful, corrupt, deceptive, materially misleading, discriminatory, harmful, materially inconsistent with Harbinger's professional obligations, or materially undermines positive-impact commitments. If such a material misalignment cannot be promptly and adequately resolved, Harbinger will end its support for the activity and may end the relationship.

10. Governance and Accountability

Harbinger Law is responsible for approving this Policy and any material amendments. Harbinger Law staff are accountable for implementing and enforcing this Policy and are responsible for:

- Monitoring compliance;
- Reviewing lobbying-related risks;
- Approving lobbying activities where required;
- Ensuring compliance with registration and reporting obligations;
- Reviewing Harbinger's relationships with relevant intermediaries;
- Reviewing concerns and complaints;
- Recommending policy updates; and
- Reporting material issues to the leader of Harbinger Law's practice.

This Policy will be reviewed annually, concurrently with presentation of annual financial results in January of each calendar year, and whenever there is a material change in applicable law, the B Lab Standards, Harbinger's activities or its impact commitments.

11. Implementation

Harbinger embeds this Policy within its operations by:

- Making the Policy available to all personnel;
- Providing guidance and training appropriate to each person's responsibilities;
- Requiring advance review of proposed lobbying activities;
- Including lobbying-law considerations in matter intake or matter planning where appropriate;
- Conducting conflict checks;
- Reviewing potential intermediaries;
- Maintaining registrations and activity records where required;
- Monitoring applicable legislative developments; and
- Publishing the Policy on Harbinger's website.

Only a person authorized by Harbinger may communicate a lobbying or advocacy position on behalf of Harbinger.

12. Risk Management

Harbinger identifies and manages lobbying-related risks through pre-activity reviews, legal compliance assessments, conflict checks, review of supporting evidence, due diligence and oversight of intermediaries, record reviews, training and investigation of reported or suspected non-compliance.

Risks may include:

- Failure to register or report;
- Inaccurate or late filings;
- Corruption, bribery or undue influence;
- Undisclosed conflicts of interest;
- Misleading or unsupported advocacy;
- Improper political contributions;
- Misalignment with Harbinger's impact commitments; and
- Reputational or professional-conduct concerns.

13. Records

Harbinger will maintain appropriate records of material lobbying and advocacy activities, including:

- The date and form of the activity;
- The government body or public officials contacted;
- The subject matter and intended outcome;
- The person or client represented;
- The evidence supporting the position;
- Internal approvals;
- Registration and reporting assessments and filings;
- Intermediaries involved;
- Significant actual or potential conflicts; and
- Any identified non-compliance and corrective action.

Records will be maintained in accordance with applicable law and Harbinger's records-management policies.

14. Compliance Monitoring

Annually, concurrently with presentation of annual financial results in January of each calendar year, the Harbinger team will evaluate compliance with this Policy. The evaluation may include a review of lobbying and advocacy records, registration and reporting assessments and filings,

approvals, training, intermediary relationships, reported concerns, breaches and corrective actions.

If Harbinger identifies non-compliance, it will take reasonable corrective action. This may include correcting a filing, modifying or ending an activity, providing additional training, strengthening controls, reconsidering an intermediary relationship, obtaining legal advice or reporting the matter to an appropriate authority.

15. Raising Concerns

Harbinger encourages partners, employees, contractors, clients, suppliers, affected communities, civil-society organizations and other stakeholders to raise concerns regarding Harbinger's lobbying or advocacy, political engagement, intermediary conduct, compliance with this Policy, corruption, bribery, conflicts of interest or related business-conduct concerns.

Concerns may be submitted to any team member at Harbinger. Harbinger will review concerns fairly and take appropriate action in compliance with established grievance procedures. Harbinger prohibits retaliation against anyone who raises concern honestly and in good faith. Where appropriate and legally permitted, Harbinger will protect the confidentiality of the person raising the concern.

16. Public Availability

This Policy will be:

- Published on Harbinger's website, www.harbingerlaw.com;
- Accessible without requiring a password or account;
- Available to employees and other stakeholders; and
- Updated following approval of any material amendment.