Political Engagement and Non-Partisanship Policy

1. Who is Rozetta Institute

Rozetta Institute Limited ACN 096 930 406 (**Rozetta**) is an independent, innovation accelerator that backs breakthrough ideas to deliver big impact for Australia.

Our independence is critical to our mission. Our independence is what allows us to take a strategic approach to identifying, developing and supporting the innovations with the potential to ignite Australia's economic prosperity. We cannot do this if compromised by political or stakeholder interests.

2. Background to the Policy

Rozetta is required to regularly engage with representatives across the political spectrum. This includes federal, state and local Members of Parliament, ministers, shadow ministers, elected officials, political staffers, party secretariats, political candidates and policy committees (**Political Representatives**).

Political engagements are a legitimate and necessary means through which Rozetta actively shapes and contributes to the design and implementation of government policy and programs. They allow Rozetta to contribute research and evidence to policy discussions, gain insights about the innovation and research environment, and build trust with key personnel, and build Rozetta's profile.

Independence – both real and perceived – however, is a critical component to Rozetta's identity. Rozetta's ability to affect change relies on public trust, cross-party relationships, and government and industry support – all of which depend on Rozetta being seen to engage independently and on the basis of evidence rather than political allegiance.

3. Purpose

The purpose of this policy is to ensure political engagements are conducted in a way that protects Rozetta's independence and its reputation for non-partisanship. This policy sets out what Rozetta will and will not do when interacting with Political Representatives, so that engagement for policy and research purposes is never confused with, or able to be characterised as, political support for a party, candidate or campaign.

4. Scope

This policy applies to:

- Rozetta and its subsidiaries and its workforce whether they are Responsible Persons (directors, officers, company secretary and anyone else responsible for governing Rozetta), employees, contractors, subcontractors, consultants, volunteers or temporary workers of Rozetta (Rozetta People).

- Third party contractors, consultants and representatives engaged to conduct government relations, communications, research dissemination or advocacy work for Rozetta; and
- all Rozetta-branded communications, publications, events, sponsorships and social media activity.

This policy does not apply to engagements by Rozetta with Government Ministers, or their representatives, acting in their official capacity as the office-holder responsible for a government portfolio.

This policy does not restrict Rozetta from making public statements about government, parliamentarians, government officials, or policies and proposed policies, where these statements are made in furtherance of Rozetta's advocacy, research or institutional interests.

This policy does not restrict any individual's personal political rights — including party membership, voting, donations made in a personal capacity, or standing for office — provided these are conducted clearly in a personal capacity, using personal time and resources, and are not held out as, or able to be reasonably mistaken for, the view or action of Rozetta. Section 8 sets out how that distinction must be maintained in practice.

5. Guiding Principles

Rozetta's political engagement is governed by four principles:

5.1 Purpose-led engagement

Rozetta engages with Political Representatives for the purpose of exploring policy ideas, contributing research and evidence, and presenting Rozetta's and its portfolio organisations' work — not to advance the electoral interests of any party, candidate or campaign.

5.2 Balance and even-handedness

Where Rozetta engages with one political party or its representatives on a policy matter, it will seek to offer comparable engagement to other major parties and relevant crossbench representatives on the same or similar terms, so that no single party is, or appears to be, favoured with privileged access.

5.3 No financial or in-kind electoral support

Rozetta will not provide financial contributions, donations, discounted or free services, staff time, in-kind resources or other support to a political party, candidate or election campaign. This is separate from, and not limited by, ordinary commercial arrangements such as paid conference attendance, venue hire at commercial rates, or fee-for-service research commissioned by government in the ordinary course.

5.4 Transparency

Political engagement of any materiality is recorded and visible to the Board (or a delegate of the Board), so that Rozetta can demonstrate, if asked, that its engagement has been even-handed and consistent with this policy.

6. Permitted Engagement

The following activities are consistent with this policy, subject to the approvals and record-keeping set out in Section 6, and provided they are conducted even-handedly across parties in accordance with Section 5.2:

- Briefings, meetings and roundtables with Political Representatives to discuss research findings, sector conditions, or policy proposals.
- Preparing and submitting research, discussion papers, or submissions to parliamentary inquiries, committees or government consultations.
- Presenting research findings, data or analysis at conferences, party conferences, fringe events, or forums organised by or featuring political parties, provided attendance is on the same commercial or invitation basis available to other parties.
- Responding to invitations to speak, present or contribute expert commentary at events hosted by a political party or affiliated body, where Rozetta's role is to present research or expertise rather than to endorse the host.
- Ordinary constituency-style contact with local members or senators on matters relevant to Rozetta's operations (for example, grant programs, regional innovation funding, or research infrastructure).
- Fee-for-service or commissioned research undertaken for government agencies or parliamentary bodies under normal commercial or grant terms.
- Sharing published research, reports and public commentary broadly, including with political offices, on the same basis it is made available to the public and media.

7. Prohibited Activities

The following are not permitted under this policy, regardless of the perceived research, relationship-building or profile-raising benefit:

- Donations of money, goods, services or discounted/free work to a political party, parliamentary wing, candidate, campaign entity or associated entity (e.g. a party's federal or state campaign fund).
- Purchasing tickets, tables or sponsorship packages at party fundraising events using Rozetta funds.
- Gifts, hospitality, sponsorship, or other benefits to a political party, elected official, candidate, or political staffer beyond ordinary, low-value hospitality incidental to a legitimate policy engagement (e.g. tea and coffee at a meeting).
- Publicly endorsing, or authorising the use of the Rozetta name, logo or brand to endorse, a political party, candidate or ticket.
- Staff undertaking campaign-related work (door knocking, phone banking, campaign strategy, drafting campaign material, scrutineering) during work time, using Rozetta resources, or in a way identified with Rozetta.
- Providing research, data, modelling or communications support that is designed for, or reasonably likely to be used in, election campaign material or attack lines against an opposing party or candidate.
- Allowing Rozetta events, publications or social media assets to be used as a platform for party-political messaging, campaign launches, or candidate promotion.

- Engaging with only one side of politics on a given policy issue over a sustained period without a documented, legitimate reason (see Section 6.3).
- Making comments, on the record or on background, that could reasonably be reported as Rozetta taking a partisan electoral position (as distinct from a policy position)

8. Governance, Approval and Record-Keeping

8.1 Authorisation

Engagement with Political Representatives on behalf of Rozetta must be authorised in advance by the CEO or delegate (for routine engagement) or the Board (for engagement that is novel, high-profile, financially material, or occurs during a caretaker or election period).

8.2 The engagement register

The Business Manager will maintain a running register of material political engagement (briefings, submissions, event participation, speaking engagements), recording the party or member involved, the purpose, and the nature of Rozetta's contribution. The register will be reviewed by the CEO at least quarterly and made available to the Board through the Audit & Risk Committee on request or at least annually, so that patterns of engagement can be checked against the balance principle in Section 5.2.

Rozetta People must promptly notify the Business Manager of any gift, hospitality or benefit offered or received from a Political Representative for inclusion in the register.

8.3 Managing imbalance

Where engagement with one political party materially outweighs engagement with others over a reporting period, the Business Manager will document the reason (for example, that party's status as the government of the day, a specific portfolio responsibility, or a one-off invitation) and take active steps to offer comparable engagement to other political parties within a reasonable timeframe.

8.4 Election and caretaker periods

During the caretaker period preceding a federal or state election, Rozetta will apply heightened caution: new commitments, funding announcements or high-profile joint appearances with any Political Representative will be deferred where possible, and any unavoidable engagement will be approved in advance by the CEO and reported to the Board.

9. Policy Advocacy vs Partisan Support

Rozetta may hold, research and publicly advocate for positions on policy questions relevant to its mission (for example, research funding settings, commercialisation policy, or innovation infrastructure). Advocating for a policy outcome is not, of itself, partisan conduct, even if only one party currently supports that outcome.

The distinction Rozetta will maintain is between advocating for an idea and supporting a party or candidate to gain or retain power. Communications should therefore:

- focus on the substance of the policy, evidence and outcomes, not on the electoral standing or opponents of any party;
- avoid language that could be read as an electoral endorsement (e.g. "vote for", "re-elect", "[Party]'s plan is the right choice for Australia");

- attribute policy positions accurately to the party or member that holds them, without adopting a campaign tone; and
- be reviewed by the CEO (or nominated delegate) prior to publication where the content discusses a party or candidate by name, particularly close to an election.

10. Rozetta People and Political Activity

Rozetta People retain personal political rights, including any party membership, donations from personal funds, attending party events in a personal capacity, and standing for elected office. To keep personal political activity clearly separate from Rozetta's institutional position:

- personal political activity must not be conducted using Rozetta email, letterhead, social media accounts, branding, equipment or work time;
- Rozetta People may not use their Rozetta position or title in a way that implies institutional endorsement when engaging in personal political activity (for example, on personal social media posts about a party or candidate);
- a director or senior employee who holds a formal office within a political party, or who intends to nominate as a candidate, must disclose this to the Board Chair/CEO so that any conflict of interest can be managed, consistent with Rozetta's Conflict of Interest Policy.

Nothing in this Policy prevents an individual disclosing, in a personal capacity and outside work channels, that they hold a particular political view.

11. Rozetta-Branded Communications & Events

Because published and social content carries institutional weight, all Rozetta-branded external communications referencing a political party, parliamentarian or candidate — including LinkedIn posts, newsletters, media releases and event promotion — should:

- be framed around the research, event or policy substance rather than the party or individual;
- credit engagement even-handedly over time (for example, not exclusively profiling appearances by members of one party); and
- be checked against this policy by the Business Manager before publication where a party or candidate is named or pictured.

Photographs, quotes or footage of Rozetta representatives with political figures may be used to report on an event Rozetta genuinely participated in, but must not be used or captioned in a way that could be read as an endorsement of that figure or their party.

12. Roles and Responsibilities

Role	Responsibility
Board	• Approves this policy and material amendments • Approves high-profile or financially material political engagement • Receives periodic reporting on engagement balance
CEO	• Authorises routine engagement with political parties and offices • Owns overall compliance with this policy • Escalates novel or sensitive matters to the Board
Business Manager	• Maintains the engagement register • Reviews branded communications referencing parties or candidates • Monitors balance of engagement across parties • Advises staff on the application of this policy
All Rozetta People	• Comply with this policy in all Rozetta-related engagement • Seek advance guidance where an activity is unclear • Keep personal political activity separate from Rozetta's institutional position

13. Breaches and Escalation

Any Rozetta Person who becomes aware of a breach or potential breach of this policy must raise it with the CEO or, if the concern involves the CEO, the Board Chair.

Any actual or potential breaches of this policy will be handled under Rozetta's existing Code of Conduct and, where relevant, Whistleblower Policy.

14. Related Documents

- Code of Conduct
- Conflict of Interests Policy
- Communications and Social Media Policy
- Whistleblower Policy

15. Review

This policy will be reviewed by the Board each year, and additionally following any material change to electoral or lobbying laws which affect or may affect Rozetta's activities.

Adopted by the Board on 25 August 2026

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Andrew Dyer
Chair