



Solvay Company Policy on Public Policy Engagement and Political Activities

1.0 INTRODUCTION

Solvay has a responsibility to ensure that policymakers and regulatory authorities understand the essential role the company plays in the marketplace and in key sustainable megatrends. Solvay pursues constructive dialogue with governmental and societal stakeholders to support its license to operate and to contribute to the development of sustainable solutions with partners.

This exchange allows Solvay to respond to changes in its environment, understand trends, anticipate regulatory expectations and developments, and communicate its views in a responsible and transparent manner.

Considering the importance and highly regulated nature of engagement with public officials, Solvay manages such engagement through its Government & Public Affairs function, in coordination with the General Counsel function where appropriate, in order to comply with applicable rules and legislation and protect company interests and confidential information.

The purpose of this Policy on Public Policy Engagement and Political Activities is to set out Solvay's principles for engagement with public officials, corporate political activities, and participation in trade and industry associations.

2.0 SCOPE

This Policy applies to Solvay, including its controlled affiliates, and to third parties acting on behalf of Solvay where relevant. It provides a global minimum framework to be applied in the context of applicable local laws.

The Policy applies where Solvay representatives seek to influence the creation, development or implementation of public policy, laws or regulations at local, regional, national or international level.

This Policy does not cover routine ordinary business, technical, scientific or compliance interactions with government authorities and regulators, such as regulatory filings, product registration updates, site administrative contacts, permits, customs documentation, tax interactions, national emissions reporting, or energy and environmental permit filings.

For the purposes of this Policy

A "Policymaker" means any individual who, as part of official duties, participates in the creation, development, influence or implementation of public policy, laws or regulations at any level of government. The definition is functional and focuses on the person's role rather than title. It includes, but is not limited to:

- Elected officials, such as members of parliaments, congresses, assemblies and local councils;

- Legislative staff who advise elected officials on policy matters;
- Executive branch officials, including ministers, cabinet secretaries, political appointees and senior civil servants (incl. diplomats) responsible for developing or enforcing regulations;
- Regulators working for independent or government regulatory bodies and agencies;
- Advisors, including members of official government advisory committees, task forces or commissions;
- Leaders, representatives, members and officials of political parties at supranational, national, regional or local level.

References to government departments, agencies, regulators, advisory bodies, embassies and officials also include officials and representatives of supranational institutions such as the European Commission and other European Union institutions, the OECD, UN bodies, WIPO and the WTO.

Lobbying and influencing of policy, legislation or regulatory measures includes any written, meeting-based or speaking interaction with a Policymaker, as well as discussions with or within an industry association on issues seeking to directly influence government policy or legislation.

3.0 PERSONNEL

Only designated or otherwise authorized Solvay representatives may interact with Policymakers on behalf of the company. Certain roles are authorized by virtue of their responsibilities, including members of the Executive Leadership Team, Global Business Unit Presidents, the Chief Public Affairs Officer, Country Directors and members of the Government & Public Affairs function.

In many jurisdictions, only designated representatives may legally advocate on behalf of Solvay with Policymakers and may need to be registered in transparency or lobbying registers. In specific cases, this can also apply to participation in an industry association on issues seeking to directly influence government policy or legislation.

Unauthorized lobbying may create significant reputational and legal risks for Solvay and the individuals involved. Solvay's Government & Public Affairs function coordinates with the General Counsel function to ensure that applicable laws and regulations are followed.

The registration of Solvay's lobbying activities and the updating of relevant lobbying or transparency register entries are overseen by Government & Public Affairs, in collaboration with the General Counsel function.

Where employees outside the Government & Public Affairs function have an opportunity to engage with Policymakers, such engagement is subject to appropriate internal review and approval.

4.0 ETHICS

Solvay follows high ethical standards when advocating before governments. In its relations with Policymakers, Solvay acts responsibly, honestly and transparently, based on its values and principles.

Solvay's dialogue and advocacy comply with its Code of Business Integrity and applicable company policies. Interactions with Policymakers must comply with applicable laws and regulations and are subject to internal processes designed to meet disclosure and reporting requirements.

Solvay aims to conduct political relations and advocacy with its own staff resources. Contacts and meetings between Solvay and Policymakers should generally be made and held by Solvay representatives, and not by agency or partner staff acting on behalf of Solvay unless explicitly authorized.

Representatives involved in relations with Policymakers are expected to complete relevant integrity, competition law, antitrust and anti-corruption training. Solvay supports transparency in the area of interest representation and participates in applicable lobby and transparency registers.

Government interactions must comply with Solvay's Anti-Bribery and Anti-Corruption Policy. Gifts and entertainment involving Policymakers, Politically Exposed Persons or their immediate family members are prohibited unless fully compliant with Solvay's applicable gifts, entertainment, charitable donations and sponsorship rules and subject to required approvals.

5.0 POLITICAL ACTIVITIES AND DONATIONS

Solvay is politically neutral. Solvay legal entities are prohibited from supporting or contributing to political parties or candidates.

Employees may support political groups only in a personal capacity. Any personal participation in the political process must take place on an individual basis, on the employee's own time and at the employee's personal expense and must not create the impression of being connected to Solvay.

Employees holding a political mandate outside Solvay must declare such engagement internally so that appropriate review can be performed where applicable. Solvay respects all applicable laws and "cooling-off periods" concerning the hiring of former Policymakers.

From time to time, Solvay may request employee participation on key issues where technical expertise or support is needed to assist the Government & Public Affairs function, such as technical expert input, letter-writing campaigns or hosting a facility visit or tour.

To maintain neutrality, Solvay observes a pre-election quiet period in the six weeks leading up to major elections, unless otherwise required by local or national law. During this period, Solvay will not provide a public platform for political parties or

candidates and will not host site visits by politicians, unless approved under applicable rules.

In the United States, Solvay maintains a policy of strict political neutrality and does not make financial contributions to political candidates, parties or related causes. The establishment, operation or use of a Political Action Committee associated with or acting on behalf of Solvay is prohibited.

6.0 INDUSTRY ASSOCIATIONS

Under the direction of the Government & Public Affairs function, Solvay may be a member of industry associations, trade organizations, industry groups and coalitions to advocate for Solvay's or the industry's interests.

Membership in or financial support of such organizations does not mean that Solvay agrees with or supports every position or lobbying action taken by those organizations or their other members.

Memberships in trade associations must be registered with and approved by the Government & Public Affairs function in accordance with Solvay's internal governance requirements.

Solvay representatives participating in industry associations, trade organizations, industry groups or coalitions are expected to complete relevant business integrity, competition law, antitrust and anti-corruption training, and to comply with Solvay's competition law requirements, including prior approval processes for contacts with competitors where applicable.

In some jurisdictions, participation in industry associations may also require registration in national lobby registers.

7.0 GUIDELINES FOR ENGAGING PUBLIC AUTHORITIES AND GOVERNMENT OFFICIALS

Engaging with Policymakers carries inherent compliance risks. Risks may arise from the engagement itself or from future government actions being perceived as providing inappropriate advantages to Solvay. Allegations of corruption can damage Solvay's reputation and affect its license to operate; therefore, interactions with public authorities are approached in a conservative and restrictive manner.

Guidelines for Government Invitations

To ensure engagements with Policymakers are strategically aligned, compliant with regulations and consistent with one company voice, Solvay representatives are required to obtain prior review and approval from Government & Public Affairs before accepting relevant external invitations.

Approval from Government & Public Affairs should be obtained before accepting an invitation or request to join or serve on a government advisory committee, expert group or task force; to speak or participate on a panel at an event organized by a government entity or featuring a Policymaker; or to receive a Policymaker at a Solvay

location, including offices, manufacturing or mining sites, and research and innovation facilities.

Approval is granted only where the non-party-political nature of the activity is clear, the activity supports Solvay's corporate vision, and the group includes representatives from a broad range of organizations such as peer companies, charities, non-political think tanks, research organizations, academia or similar bodies.

Solvay does not support or sponsor political parties, candidates or political activities. Sponsorship of government-hosted events may be considered where it does not compromise Solvay's political neutrality and is in the company's business interest, subject to appropriate internal approval.

Guidelines for Meetings

Meetings with Policymakers are part of business operations and must be managed in compliance with applicable laws and regulations. Solvay representatives should consult with and involve Government & Public Affairs in such meetings.

Engagements should be limited to Policymakers with a direct interest in the issue and Solvay representatives serving a legitimate business purpose. Meetings with Policymakers should generally be attended by at least two Solvay representatives, unless an exception is approved by the relevant Government & Public Affairs representative.

Communications should take place through official channels and include the appropriate representatives and relevant details. Instant messaging applications should be avoided for official engagement.

Offering gifts or entertainment to public officials is prohibited under Solvay policies, except for limited exceptions expressly permitted under applicable gift and entertainment rules and subject to prior approval. Offering gifts, meals or hospitality with an expectation of a favorable action or counter-performance is strictly prohibited.

Meetings should remain focused on the agreed scope. Confidential information must not be shared without appropriate internal review and approval. Personal or recreational invitations to government officials while representing Solvay's interests are prohibited.

Meeting minutes should be prepared after relevant meetings, accurately recording participants, topics discussed and resulting action items, and should be shared internally with Government & Public Affairs as appropriate.

Before meetings with Policymakers, Solvay representatives must secure alignment from Government & Public Affairs and the relevant Global Business Unit or corporate function so that all communications are accurate, consistent and approved.

Any inadequate or inappropriate behavior by a government official must be carefully rejected and reported internally to the General Counsel function, including Compliance & Integrity, for assessment of potential next steps.

Guidelines regarding Communications and Consultations

Communications with government entities and Policymakers may be subject to national rules on freedom of information or access to public documents. Communications should therefore be conducted through official Solvay communication channels and in a formal business style, in line with Solvay's Code of Business Integrity.

Confidential information must not be shared in written form without review and approval by Government & Public Affairs, the General Counsel function and the relevant business. Documents shared with authorities should be internally archived for later review if necessary.

Official submissions of company positions to governments, including public consultation responses, should occur only following proper internal alignment and approvals with relevant businesses, the General Counsel function and Government & Public Affairs, and should consider the overall interests of Solvay as a group.

Because interactions with Policymakers may be subject to special rules in some countries, Government & Public Affairs should be consulted before submitting positions to government entities or Policymakers.

8.0 USE OF THIRD PARTIES FOR ADVOCACY

Solvay aims to conduct political advocacy with its own staff resources. The use of external agencies or consultants to act on Solvay's behalf in meetings with Policymakers is prohibited unless exceptional circumstances apply, and explicit authorization is obtained.

External consultants or agencies for advocacy and lobbying purposes may only be hired through the Government & Public Affairs function. Business units or functions wishing to use such external resources should contact Government & Public Affairs first.

9.0 POLICY COMPLIANCE

Any violation of this Policy may result in appropriate disciplinary action or other measures, subject to and in conformance with applicable laws.

Solvay may pursue available legal and equitable remedies against violations of this Policy, including referral for criminal prosecution, civil action, injunctive relief, monetary relief, costs, fees and other remedies available under the laws of the applicable jurisdiction.