

FOREWORD

Arkema is a global leader in specialty materials, organized around three business segments (Adhesives, Advanced Materials and Coating Solutions), with operations in nearly 55 countries and more than 21,000 employees.

With more than 150 industrial facilities and research centres worldwide, Arkema is present in every region of the world.

Because of its local and territorial roots, Arkema has always valued transparent dialogue with government and public authorities. As such, the Group aims to make a constructive contribution to the democratic process by providing government/public decision-makers with information that complements their thinking and contributes to fair and informed decision-making, in strict compliance with applicable laws and the principles of integrity and transparency.

The purpose of this Responsible Lobbying Policy (the “Policy”) is to set out the guiding principles of Arkema’s lobbying and government/public affairs activities, and notably to:

- enable Group employees to understand what lobbying and government/public affairs activities are, so that they can identify whether any part of their activity falls within the scope of these activities; and
- define the minimum rules and standards to be respected by all employees and third parties performing lobbying and government/public affairs activities on behalf of the Group.

This Policy may be supplemented by country-specific rules relating to lobbying and government/public affairs activities, subject to prior review from the Global Head of the Government/Public Affairs Department and the Legal Department, and subject to prior approval from the relevant Country President.

1. DEFINITIONS

Lobbying is defined by Transparency International as “*any communication, written or oral, between a representative or interest group and a government/public decision-maker with the aim of influencing a decision*”. In general, it also includes efforts in support of such communications, including preparation and planning activities, research and/or other background work that is intended, at the time it is performed, for use in lobbying communications.

Government/public affairs include all actions that promote a company’s rights and interests and inform government/public bodies and government/public decision-makers in a country, likely to make decisions that could have an impact on the company’s activities. This may take the form of direct lobbying (a direct link between the company and government/public decision-makers) or indirect lobbying, notably via professional federations/associations to which the company is a member.

In general, lobbying and government/public affairs activities do not include requests for administrative authorisation or responses to calls for tender under public procurement contracts. These activities are therefore excluded from the scope of this Policy. The Regional Government/Public Affairs officer should in any case be consulted, in advance, to confirm that an activity does not fall within a local or regional lobbying registration or reporting requirement.

2. SCOPE OF THE POLICY

This Policy applies to all Group employees and to third parties, without geographical limitation, who may carry out lobbying and government/public affairs activities for the Group as defined in section 1.

3. GUIDING PRINCIPLES UNDER THE POLICY

In its relationships with government/public decision-makers, Arkema commits to carry out lobbying and government/public affairs activities with the highest ethical standards and in full compliance with applicable laws and the principles set forth in the Arkema Business Conduct & Ethics Code.

Lobbying shall not be misused to improperly influence any decision by inducing government/public decision-makers to act or not to act in violation of their lawful duties.

Arkema shall not make contributions to political parties, elected officials or candidates to an election.

In the United States, Arkema employees have made use of their right to establish a Political Action Committee. The Arkema Inc. Political Action Committee (APAC) is a federally registered employee association which collects voluntary contributions from Arkema employees for political purposes and decides how these are used, in accordance with U.S. law, and, as such, APAC activities are permitted in the United States.

In the countries where companies are required by law to register themselves and report on their lobbying and government/public activities, Arkema shall comply with these requirements. Arkema is duly registered on the European institutions' "Transparency Register" and has committed to comply with the associated code of conduct. In France, Arkema reports annually on its lobbying and government/public affairs activities as part of its obligations under the national digital register of interest representatives set up in 2017 and managed by the French High Authority for Transparency in Public Life (HATVP). Similarly, in the United States, Arkema complies with the Lobbying Disclosure Act of 1995 and later amendments by reporting its lobbying activities to Congress on a quarterly basis.

4. RULES AND DUTIES UNDER THE POLICY

4.1 Rules and duties for employees carrying out lobbying and government/public affairs activities other than Government/Public Affairs officers

At Arkema, lobbying and government/public affairs activities shall only be performed by employees authorized to do so.

Any Group employee who intends to engage in lobbying and government/public affairs activities as defined in section 1, shall refer the matter to:

- either (i) the Country President, or (ii) the Global Head of the Business Unit, or (iii) the Global Head of the Functional Department, as appropriate within his/her matrix reporting line; and
- the Government/Public Affairs Department.

If an employee is unsure whether any part of her/his activity falls within the scope of the above definitions, she/he should seek clarification from the Government/Public Affairs Department.

Once their role has been formally validated, such employees shall sign this Policy and commit to the following rules in all their dealings with governmental or public bodies, institutions or agencies:

- always identify themselves by name and by the company they work for;
- ensure that the information that they provide is reliable, verifiable and up-to-date;
- strictly refrain from obtaining information through illegal means;
- strictly comply with all applicable laws as well as with the Arkema Business Conduct & Ethics Code, the Arkema Anti-Corruption Policy and the Arkema Guidelines on Conflicts of Interest.

In addition, any Group employee contacted by government/public authorities to discuss political actions and/or decisions must immediately refer the matter to the Government/Public Affairs Department.

4.2 Rules and duties for third parties carrying out lobbying and government/public affairs activities

Third parties performing lobbying and government/public affairs activities on behalf of the Group, shall be subject to prior approval by the Government/Public Affairs Department and, in addition (i) the Country President, or (ii) the Global Head of the Business Unit, or (iii) the Global Head of the Functional Department — whichever holds responsibility for the subject matter to which such activities pertain. Such third parties shall be appointed pursuant to a written mandate signed by the relevant Group entity. Where appropriate, the Legal Department shall be consulted.

Appointed third parties shall sign this Policy and commit to the following rules in all their dealings with governmental or public bodies, institutions or agencies:

- always identify themselves by name and by the company they work for;
- ensure that the information that they provide is reliable, verifiable and up-to-date;

- strictly refrain from obtaining information through illegal means;
- strictly comply all applicable laws as well as with the Arkema Business Conduct & Ethics Code, the Arkema Anti-Corruption Policy and the Arkema Guidelines on Conflicts of Interest.

4.3 Rules and duties for Government/Public Affairs officers

Arkema's Government/Public Affairs Department is committed to making a transparent and constructive contribution to public policy dialogue, in accordance with applicable laws and Arkema's internal rules and policies. Accordingly, Government/Public Affairs officers shall notably abide by the following rules:

- Government/Public Affairs officers officially designated as such shall sign this Policy. They undertake to provide government/public decision-makers with reliable, verifiable and up-to-date information. The positions taken must be in line with the strategy decided by the Group's Executive Committee, and notably the Group's decarbonisation trajectory approved by Science Based Targets initiative (STBi) complying with the Paris Agreement. Officers shall strictly refrain from obtaining information through illegal means and shall comply with the Arkema Business Conduct & Ethics Code, the Arkema Anti-Corruption Policy and the Arkema Guidelines on Conflicts of Interest.
- Government/Public Affairs officers shall comply with all applicable laws and regulations. Officers shall notably register with the institutions to which lobbying is carried out, where these exist, and fulfill any applicable declaration obligations. Any registration shall be reported to the Global Head of the Government/Public Affairs Department.
- Government/Public Affairs officers shall maintain a list of meeting activities that fall within the scope of government/public affairs activities as set out in section 1, as required by regional reporting requirements.

4.4 Rules related to professional associations/federations

Each Group entity, Business Unit and/or Functional Direction as applicable, shall maintain an up-to-date record of the professional associations/federations to which it is a member, using the dedicated tool implemented by Arkema for that purpose. This record shall include the names of the Group entity/Business Unit/Functional Department's representatives in these associations/federations, the amount of the membership fee, and any other information required by local laws.

The Group entity/Business Unit/Functional Department shall inquire whether the professional associations/federations to which it is a member are aligned with the Paris Agreement. If the professional associations/federations respond negatively or fail to provide an answer, the matter shall be reported to the Global Head of Government/Public Affairs.

5. IMPLEMENTATION OF THE POLICY

This Policy is under the responsibility of Arkema's Government/Public Affairs Department. It will be regularly reviewed and modified according to needs and changes in practices.

As stated in the foreword, this Policy may be supplemented by country-specific rules relating to lobbying and government/public affairs activities, subject to prior review from the Global Head of the Government/Public Affairs Department and the Legal Department, and subject to prior approval from the Country President.

This Policy has been validated by Arkema's Executive Committee. It is available on the Group's website.

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