

## Political Communication at LANXESS

As a globally operating company, LANXESS plays an active role in society and contributes to the development of sustainable solutions that address contemporary challenges. To this end, we engage in ongoing dialogue with various stakeholders, including political entities. We have formulated binding guidelines to govern our participation in the political sphere in accordance with our corporate governance.

Political communication at LANXESS follows ethical principles and is subject to compliance with corresponding legal regulations as well as internal guidelines. It is an integral part of responsible corporate management.

The primary responsibility for LANXESS's engagement in the political sphere rests with the company's Board of Management. This is reflected, among other things, in the involvement of our Board members in associations and committees (see appendix for a selection of the principal memberships held by our Board of Management). Below the level of the Board of Management, political communication is organized with well-defined responsibilities and regulated within internal committees using defined mechanisms.

### Principles

LANXESS engages in discourse with political stakeholders, associations, and NGOs. **This communication is centered on objective and fact-based exchanges.** Our aim is to provide information, convey our perspective on relevant issues, and establish transparency regarding our interests. Simultaneously, LANXESS seeks to remain informed about politically significant content and developments, thereby anticipating their potential impact on the company at an early stage.

LANXESS's political communication is based on the conviction that politicians and companies have an equal responsibility in providing answers to central questions of the future. LANXESS considers transparent and open exchange with political stakeholders to be an important part of its social responsibility. In its political communication, LANXESS takes a position on issues, not on political parties or representatives. LANXESS welcomes dialogue with all relevant stakeholders.

## **Code of Conduct for LANXESS Representatives Engaging with Political Stakeholders**

LANXESS employees must always clearly identify themselves as representatives of the company to their conversational partner and maintain transparency regarding their objectives and interests.

- Content-wise, LANXESS employees are guided by the positions of the company
- LANXESS employees must not attempt to obtain information or decisions under pressure or in an unfair manner.
- The information provided by LANXESS employees is complete and correct to the best of their knowledge.
- LANXESS employees respect the general rules of conduct applicable to political representatives.

LANXESS ensures transparency in its political communication by registering in the lobby register at the German Parliament and the EU Transparency Register. It also complies with the corresponding applicable legal requirements when engaging with the respective political target group. In other jurisdictions, national regulations may apply. In the United States, the U.S. Government Affairs Policy applies.

In addition, internal company regulations also apply to political communications:

- Code of Conduct
- Anti-corruption standard

## **Political Relations within LANXESS**

The dialogue with external stakeholders from politics, associations and NGOs is primarily conducted by the "Political Relations" team within the LANXESS Corporate Communications department. This team also handles internal preparation of political content and advises and supports company decision-makers on political matters.

The Political Relations team operates predominantly from Berlin, Brussels, Cologne, and the United States. The guidelines outlined here apply to employees at all locations.

LANXESS transparently discloses its expenditures on political communication, following the requirements outlined by the lobby register of the German Parliament, the European Union, and the United States. Additionally, LANXESS ensures that information regarding contributions and expenditures related to political activities is readily available and accessible. This information is published on the company's [website](#).

## **Political Party Donations**

LANXESS does not make donations to political parties or party-affiliated organizations, to politicians or candidates running for political office. The company maintains political neutrality. Any donations made by associations of which LANXESS is a member are carried out autonomously, in compliance with legal regulations.

## **Association memberships**

We disclose our membership in various associations as an integral part of our entry in the lobby register at the German Parliament. We review and update our entry at regular intervals.

## **Political Positions LANXESS**

LANXESS regularly publishes political positions on key issues on its [website](#), particularly in the areas of energy and climate policy, environmental policy and chemicals policy. LANXESS also provides comprehensive information on its climate strategy "[Climate Neutral 2040](#)". This information is freely accessible to all stakeholders and is updated regularly.

For inquiries related to LANXESS's political positions and the company's political communication, stakeholders may contact Sarah Zeising ([sarah.zeising@lanxess.com](mailto:sarah.zeising@lanxess.com)) at any time.

Cologne, May 23, 2023

## **Appendix: Principal Memberships held by our Board of Management (selection)**

- Matthias Zachert:
  - Member of the VCI Presidium
  - Member of the Presidium of the Ostasiatischer Verein e.V.
  
- Dr. Anno Borkowsky:
  - Member of the CEFIC Board
  - Member of the Board BAVC (Guest)
  - Member of the Board VCI NRW
  - Member of the Trade Policy Council VCI
  - Co-Chair on the Board of the Transatlantic Business Initiative e.V. (TBI) c/o Bundesverband der Deutschen Industrie e.V.
  - Member of the Advisory Council of the German Economic Institute
  
- Dr. Hubert Fink:
  - Member of the Board of Trustees of the Chemical Industry Fund (VCI)
  
- Michael Pontzen:
  - Member of the Executive Board of Deutsches Aktieninstitut e.V.