

Corporate Interest Representation Policy – Novamont

1. Introduction

Founded in 1990, Novamont is a Benefit Corporation and a certified B Corp, recognized among the international leaders in the bioplastics sector and in the development of bioproducts and biochemicals. Its mission is to develop materials and products through the integration of chemistry and agriculture, activating biorefineries integrated within local territories. Novamont develops and produces products derived wholly or partly from biomass, which are biodegradable and compostable, and designed as solutions to issues related to water and soil quality while pursuing continuous innovation. Since 2023, Novamont has been part of the Versalis (Eni) group, Italy's leading chemical company, whose strategy is strongly focused on portfolio specialization, including through chemistry based on renewable resources. The company aims to make a significant contribution to the circular bioeconomy by promoting a development model rooted in local communities and focused on the protection and regeneration of soil and water resources. The model is based on the creation of integrated value chains starting from local communities and on the revitalization of abandoned or non-competitive production and research sites, transforming them into innovation hubs.

2. Purpose and scope

2.1 Purpose of the Corporate Interest Representation Policy

The purpose of this Policy is to provide the principles and guidelines for responsible, clear, and transparent engagement with political decision-makers, aimed at representing the company's legitimate concerns, positions, and interests before institutions.

2.2 Scope of Application

This Policy applies to Novamont's corporate bodies, employees, and collaborators. It is communicated internally and published on the company website.

3. Relations with Institutions

Novamont considers dialogue with institutions to be an integral part of its responsibility as a Benefit Corporation, with the objective of contributing to the development of public policies that support the transition towards a circular bioeconomy model.

The fifth common benefit purpose included in Novamont's Articles of Association, which substantiates its commitment as a Benefit Corporation, is: "Contributing to the creation of a virtuous system by building

alliances with local stakeholders and connecting different sectors, as well as fostering cultural growth and knowledge on circular bioeconomy issues, promoting educational activities in collaboration with public and private sector partners and awareness-raising initiatives on sustainable development”.

The circular bioeconomy is a highly multidisciplinary sector that requires significant individual and collective effort. Building alliances and strategic partnerships with actors throughout the value chain, as well as with local territories and communities, is an essential element to integrate different areas of expertise and test new solutions with a pioneering and constructive spirit and to help create a shared culture around circular bioeconomy topics.

In this context, Novamont actively participates in the most relevant networks and institutional initiatives considered benchmarks for the circular economy and bioeconomy at both national and international levels.

To enhance the role of industry in generating tangible local impacts, through a Corporate Political Responsibility approach — that is, extending corporate commitments in environmental, social, and economic areas into the public sphere — Novamont collaborates with local administrations, sharing its expertise and contributing to the development of joint projects. Collaborations with public administrations, multi-utilities, and the broader waste treatment sector have been essential in establishing best practices for organic waste management, making Italy a model for Europe, as well as generating research and innovation projects.

4. Company Commitments

Consistent with its objective of maintaining responsible engagement with policy-makers and institutions while pursuing common benefits for society, Novamont commits to:

- 1. Carrying out activities aimed at contributing to the development of regulatory and legislative proposals with the purpose of helping generate a positive impact on society and the environment, while recognizing and considering interests beyond its own.*
- 2. Interacting with institutions in an open, transparent, fair, and verifiable manner, respecting the role and independence of public decision-makers.*
- 3. Not supporting initiatives or positions that conflict with the company’s sustainability and circularity objectives.*
- 4. Presenting contributions based on scientific evidence and transparent, reliable data.*
- 5. Not providing contributions to political parties, movements, committees, political or trade union organizations, or to their representatives and candidates.*
- 6. Not offering, giving, or receiving gifts or hospitality intended to create a sense of obligation or improperly influence any decision or activity.*

7. *Adopting a proactive approach to combating corruption and extortion.*
 8. *Applying a responsible approach to corporate interest representation also when working through intermediary organizations.*
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5. Governance, Control and Risk Management

Responsibility for implementing the Corporate Interest Representation Policy lies with the Systemic PMO, Communication and Institutional Affairs Liaison Team, which ensures its implementation through an integrated and systemic approach across the company, in accordance with the roles and responsibilities assigned to the other relevant functions.

The Institutional and Regulatory Affairs process is structured into four integrated and coordinated sub-processes that together form a single value chain:

- Analysis of the political, geopolitical, legislative and regulatory environment and assessment of business impacts
- Positioning
- External Engagement Activities
- Monitoring and Follow-up

The outcome of this value chain enables the identification of regulatory and legislative issues of interest and the definition and implementation of appropriate external actions to manage compliance risks and establish the most suitable courses of action.

Stakeholders wishing to engage in dialogue or discussion may contact the company at:

LEGAL@PEC.NOVAMONT.COM

6. Approval, Development and Updating

The Corporate Interest Representation Policy is developed by Novamont's Systemic PMO, Communication and Institutional Affairs Liaison Team in collaboration with Eni's Regulatory System Team.

The Policy is approved by the Novamont Board of Directors. It is subject to periodic review and updated whenever necessary. Any revised version of the document must also be approved by the Novamont Board of Directors.

7. Internal Regulatory References

- Anti-Corruption Policy
- Code of Ethics
- Compliance Models on Corporate Administrative Liability for Subsidiaries
- ECG Antitrust Policy



- Institutional and Regulatory Affairs MSG
- Legislative Decree 231 Model
- Regulatory System Policy
- Relations with Industry Associations and Working Groups MSG