

MPM Products Ltd - Responsible Lobbying Policy

1. Purpose of This Policy

MPM Products Ltd is committed to conducting any public policy engagement, advocacy, or lobbying activity responsibly, transparently, and in a way that supports positive social and environmental outcomes.

Where the Company engages in policy discussions or industry representation, it does so in alignment with its purpose, sustainability commitments, and responsible business principles.

2. Scope

This policy applies to:

- All employees, directors, and executives
- External consultants or advisors acting on behalf of the Company
- Engagement through industry associations, trade bodies, or intermediary organisations

3. Approach to Responsible Lobbying

MPM Products Ltd will only engage in lobbying or policy advocacy that:

- Contributes to a positive impact on society and/or the environment
- Aligns with the Company's sustainability commitments and responsible business principles
- Does not undermine environmental protection, human rights, or social equity

The Company will not support lobbying activities that conflict with its purpose or that weaken environmental or social standards.

4. Evidence-Based Policy Positions

We are committed to respecting the privacy and personal data of individuals and companies

Where the Company contributes to policy discussions, its positions are informed by:

- Reliable, evidence-based data
- Scientific research where available
- Independent market and industry insights
- Recognised frameworks and standards relevant to sustainability, human rights, and responsible business

5. Political Contributions

MPM Products Ltd does not make direct financial political contributions to political parties, candidates, or campaigns.

Any in-kind support or engagement must comply with applicable laws and internal governance processes and must not conflict with this policy.

6. Anti-Corruption and Bribery

All lobbying and public policy engagement activities are subject to the Company's Anti-Bribery and Corruption Policy.

The Company prohibits:

- Bribes, facilitation payments, or improper influence
- Gifts, hospitality, or benefits intended to improperly influence public official

7. Engagement via Intermediary Organisations

Where MPM Products Ltd participates in trade associations or industry groups that engage in lobbying:

- The Company seeks to ensure that the organisation's policy positions are broadly consistent with this Responsible Lobbying Policy
- If positions taken by an intermediary organisation conflict with the Company's sustainability commitments or responsible business principles, MPM will:
 - Clarify its own position
 - Seek to positively influence the organisation's stance
 - Reassess its participation where material misalignment exists

8. Governance and Accountability

This policy is approved by the Board of Directors.

Executive accountability for compliance with this policy sits with the Executive Team, with operational oversight under relevant functions including Sustainability/ESG, Legal, and Compliance where applicable.

The policy is reviewed at least annually.

9. Implementation and Controls

The Company embeds this policy through:

- Internal governance and approval processes for public policy engagement
- Alignment with existing compliance frameworks, including anti-corruption and ethical conduct controls
- Executive oversight of material policy engagement activities

Risks of non-compliance are managed through established legal, compliance, and governance processes.

This Responsible Lobbying Policy operates alongside and is supported by the Company's:

- Anti-Bribery and Corruption Policy
- Fraud and Failure to Prevent Fraud controls
- Tax Evasion Prevention Policy
- Whistleblowing and Grievance Procedures

Together, these policies form part of MPM Products Ltd's broader governance, risk management, and due diligence framework for responsible business conduct.

10. Monitoring and Review

The Company periodically reviews its policy engagement activities to ensure alignment with:

- This policy
- Its sustainability commitments
- Responsible business standards

11. Raising Concerns

Stakeholders may raise concerns about the Company's business conduct or lobbying-related activities through existing grievance or whistleblowing channels, as outlined in the Company's grievance procedures.

12. Publications

This policy is publicly available and accessible to stakeholders.