Political Engagement Policy

Group policy

xstreco

Contents

Approved by	The Board of Directors of Xstreco AG
Issued by	Executive management
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Version	2.1

1 Introduction

1.1 Purpose and Scope

1.1.1 Purpose of the Policy

This policy sets out the requirements that apply to the political engagement of the Group. It covers political contributions, the use of Group resources, contact with public officials, trade association membership and the personal political activity of employees. Bribery of public officials is dealt with by the Anti-Corruption and Bribery Policy.

1.1.2 Scope and Applicability

This policy applies to all employees, directors, officers, and contractors under Xstreco's direct supervision, working for any Xstreco office or industrial asset directly or indirectly controlled or operated by Xstreco worldwide. Where the Group holds an interest in a joint venture that it does not control or operate, it uses its influence to encourage conduct consistent with this policy.

2 Policy Statement

2.1 Group’s Stance on Political Engagement

Political engagement by the Group must be non-partisan. Support for a political party, candidate, campaign or political ideology is prohibited, whether direct or indirect. The use of Group funds, assets, facilities or working time for a partisan political purpose is prohibited. Contact with public officials must be lawful and consistent with the Code of Conduct.

2.2 Legal Implications

In Switzerland, the Federal Act on Political Rights (SR 161.1) and the Ordinance on Transparency in Political Funding (SR 161.18) require political parties represented in the Federal Assembly, and campaign actors whose spending on an election to the National Council or on a federal popular vote exceeds the spending threshold the Act sets, to disclose the identity of donors contributing above the separate donation threshold the Act sets; the Ordinance governs the procedure. Those subject to the disclosure duty may not accept anonymous donations or, subject to an exception for Swiss citizens resident abroad, donations from abroad. The duty falls on the recipient, not on the donor. In Peru, Ley N.° 28094, Ley de Organizaciones Políticas, as amended, regulates political financing; it permits capped contributions by Peruvian legal persons and prohibits contributions by foreign for-profit entities. This policy prohibits political contributions by any Group entity whether or not the applicable law would permit one. The following are standards, not binding law:

(a) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: Recommendations to enterprises.

(b) UN Global Compact: Ten principles, the tenth of which concerns corruption.

(c) Transparency International UK, Wise Counsel or Dark Arts? Principles and Guidance for Responsible Corporate Political Engagement: Guidance on preventing undue influence.

Non-compliance with this policy, and the conduct it prohibits, may result in reputational damage, legal penalties, and internal disciplinary action.

3 Key Principles and Guidelines

3.1 Specific Principles or Guidelines

This policy requires the following principles to be applied:

(a) Political Neutrality: Political contributions and use of Group resources for partisan political purposes are prohibited.

(b) Authorised Engagement: Only persons designated for the purpose by executive management may lobby, or represent the Group's position on public policy to public officials, on the Group's behalf. Routine dealings with public officials in the course of permitting, inspection and compliance are not lobbying, but must be lawful and recorded as section 4.7 requires.

(c) Lobbying and Advocacy: Lobbying must comply with the applicable law and be approved in advance by executive management.

(d) Trade Association Oversight: Where the Group is a member of a trade association, the positions taken by that association must be reviewed against this policy on the cycle stated in section 8, and whenever the association takes a position inconsistent with a Group policy. Membership dues must not be used to support a political party, candidate or campaign, and, where the Group becomes aware that the association applies its dues in that way, the membership must be discontinued unless the association ceases to do so.

(e) Personal Political Activity: Employees may engage in political activity in a personal capacity, but must not represent the Group or imply its endorsement.

(f) Transparency and Disclosure: Any disclosure of lobbying or of a policy position required by law must be made.

3.2 Examples and Applications

(a) Use of Group Funds for Political Purposes: An employee attempts to use Group funds to attend a political fundraiser. This is prohibited and must be reported.

(b) Trade Association Misalignment: A trade association publicly supports legislation inconsistent with the Environmental Sustainability Policy. The matter must be referred to the compliance function and to executive management.

(c) Unregistered Lobbying: A person engages in lobbying without making a registration that the applicable law requires. This is a breach of this policy and may have legal consequences.

(d) Social Media Misrepresentation: An employee posts political opinions using their job title in the Group without making clear that the views are personal. This is a breach of this policy and must be reported.

4 Roles and Responsibilities

4.1 The Board

Oversight of this policy rests with the board. The board approves this policy and each revision of it.

4.2 Executive Management

Executive management issues this policy, provides the means required to apply it, and is accountable to the board for its application. Where this policy requires a matter to be escalated, it is escalated to executive management.

4.3 Responsibility for This Policy

Responsibility for the day-to-day application of this policy is assigned within the Group. This policy requires that the assignment be recorded in the Schedule of Policy Assignments, an internal document, be kept current, and be made known to those subject to this policy. Where this policy refers to the compliance function, it means the person or persons holding that assignment at the relevant time, whether or not a separate department exists.

4.4 Those Who Direct the Work of Others

Anyone who directs the work of others is responsible for applying this policy in the work they direct, for making those they direct aware of it, and for passing on a concern raised with them.

4.5 Everyone Subject to This Policy

Everyone subject to this policy must comply with it, must raise a concern where they believe it has been or may be breached, and must co-operate with any enquiry into such a concern.

4.6 Counterparties

Counterparties must meet the standards in this policy where their contract with the Group so provides, and may raise a concern through the channels in section 5.1.

4.7 Those Responsible for External Relations

Those responsible for the Group's dealings with government, regulators and representative bodies are responsible for keeping those dealings within the limits this policy sets, for obtaining the approval it requires, and for keeping a record of what was said and on whose behalf.

5 Reporting and Monitoring

5.1 Reporting Mechanisms

5.1.1 Internal Reporting

A concern under this policy may be raised with a line manager, with any member of executive management, or with the compliance function. A concern may also be raised through the web reporting form at xstreco.com/report, by writing to compliance@xstreco.com or codeofconduct@xstreco.com, both of which reach the compliance function, or by telephone on +41 41 562 32 90, asking for the compliance function. Retaliation against a person who raises a concern in good faith is prohibited.

5.1.2 External Reporting

A person who is not employed by the Group may raise a concern through the web reporting form at xstreco.com/report, by writing to compliance@xstreco.com or codeofconduct@xstreco.com, by telephone on +41 41 562 32 90, or by post, marked 'Confidential - Compliance', to the address at the end of this document. A concern may be raised in English or in Spanish. A name and contact details are not required, and a concern raised without them is assessed in the same way. The Group's website provider records basic technical data with every submission, so a report made through the form is not technically anonymous, and a call is not anonymous; a report sent by post can be.

5.2 Monitoring Procedures

This policy requires that its application be kept under review, and that a record sufficient to show how it has been applied be kept. In particular, this policy requires:

(a) that compliance with this policy be reviewed on the cycle stated in section 8;

(b) that concerns raised under this policy, and the way in which each was resolved, be recorded;

(c) that the risk this policy addresses be reassessed whenever the Group's activities change materially;

(d) that matters which are unresolved, which recur, or which are systemic be escalated to executive management and, where the law requires it or it is otherwise appropriate, to the competent authorities;

(e) that those subject to this policy be able to demonstrate, from the records kept, that its requirements were met.

The means used to meet these requirements are proportionate to the size of the Group and to the scale and nature of its activities at the time, and are extended as those change.

6 Training and Awareness

6.1 Awareness on Appointment

This policy requires that everyone subject to it be made aware of it on appointment and be given the instruction needed to apply it in their role. The form and the depth of that instruction are proportionate to the role.

6.2 Continuing Awareness

This policy requires that awareness of it be refreshed on the cycle stated in section 8, and whenever the policy is revised or an event makes it necessary, and that those in roles carrying greater exposure to the risk this policy addresses receive instruction appropriate to that exposure.

7 Compliance and Consequences

7.1 Reporting Non-Compliance

Everyone subject to this policy must report suspected violations, as must counterparties where their contract with the Group so provides. The identity of the person making a report is treated as confidential and is not disclosed except where disclosure is required by law or is necessary for the enquiry, and then only to the extent necessary. Retaliation against a person who reports in good faith is prohibited.

7.2 Consequences of Non-Compliance

Violations may result in disciplinary action, including termination of employment or contract, and may trigger legal proceedings.

8 Review and Revision

8.1 Review Frequency

8.1.1 Review Cycle

This policy is reviewed at least once in every two calendar years.

8.1.2 Event-Triggered Review

A review is carried out, whether or not one is due under the cycle, whenever a change in the law, a material change in the Group's activities, or an event arising under this policy makes one necessary.

8.1.3 Conduct and Outcome of the Review

The review is carried out by the holder of the responsibility described in section 4.3. Its outcome is submitted to the board, and any revision resulting from it is approved by the board before issue.

8.2 Revision History

8.2.1 Version 2.1 - 01.09.2026

Approved by the board and issued by executive management following a scheduled review of the suite. The amendments are editorial and clarifying; the policy positions stated in version 2.0 are unchanged.

8.2.2 Version 2.0 - 01.01.2026

Approved by the board and issued by executive management, replacing the first issue.

8.2.3 Version 1.0 - 02.06.2025

First issue.

8.2.4 Superseded Versions

Superseded versions are retained. Each revision is communicated to those subject to this policy.

9 Appendices

9.1 Glossary of Terms

(a) Political Contribution: A donation or gift, in money or in kind, made to a political party, candidate or campaign.

(b) Lobbying: The act of attempting to influence a decision of government on legislation, regulation or public policy, whether directly or through a representative body. Routine dealings with public officials in the course of permitting, inspection and compliance are not lobbying.

(c) Public Official: An officer, employee or representative of a state, of a state-controlled or state-owned entity or of a public international organisation, a member of a legislature, a candidate for public office, and an official of a political party.

(d) Trade Association: An organisation funded by businesses in a specific industry to advocate for shared interests.

(e) Advocacy: The act of supporting or promoting a cause or a policy position.

(f) Transparency: The disclosure of information about the Group's political engagement that the applicable law requires, made in accordance with this policy.

9.2 Related Legislation

9.2.1 Local Legislation

In Switzerland, the Federal Act on Political Rights (SR 161.1) and the Ordinance on Transparency in Political Funding (SR 161.18), under which the recipient of political funding, not the donor, must disclose donors above the thresholds the Act sets. In Peru, Ley N.° 28094, Ley de Organizaciones Políticas, as amended, which regulates the financing of political organisations, permits capped contributions by Peruvian legal persons and prohibits contributions by foreign for-profit entities. Political contributions are prohibited throughout the Group: none may be made in any jurisdiction, whether or not the applicable law would permit one.

9.2.2 International Standards and Frameworks

(a) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: Recommendations to enterprises.

(b) UN Global Compact: Ten principles, the tenth of which concerns corruption.

(c) Transparency International UK, Wise Counsel or Dark Arts? Principles and Guidance for Responsible Corporate Political Engagement: Guidance on preventing undue influence.

“Xstreco’s policies set the standards that govern how the Group conducts its activities and how that conduct is assessed.”

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