

McPhy Responsible Lobbying Policy

Introduction

Definition of lobbying

In the context of this policy, “Lobbying” describes any action by an individual or company toward a government or administration representative, legislator or members of regulatory agencies or policy-making bodies aimed at influencing public policy.

Scope, applicability & purpose of this policy

Designer, manufacturer and integrator of hydrogen equipment since 2008, McPhy's ambition is to become a European champion of equipment in water electrolysis to produce hydrogen and hydrogen refueling stations. The vision of McPhy is to be a trusted leader in the development of electrolytic hydrogen and hydrogen distribution infrastructures, particularly for mobility, industry and energy.

The objective of this policy is to establish a structure for lobbying endeavors and uphold a uniform and accountable method for conducting lobbying activities throughout McPhy.

This policy is relevant to all individuals employed or contracted by McPhy, as well as external parties engaged in lobbying efforts on behalf of McPhy. Consequently, individuals associated with McPhy and external parties hired by the Group for lobbying purposes must familiarize themselves with relevant regulations and adhere to the principles of responsible lobbying delineated in this policy, which emphasize transparency, honesty, and integrity.

The responsibility for coordinating lobbying activities and ensuring compliance with this policy is assigned to a Public Affairs Manager, reporting to the Strategy Department.

McPhy approach to responsible lobbying

Principles for action

McPhy acknowledges its responsibility to proactively participate and make valuable contributions to the public decision-making process in the countries where it operates. This commitment is driven by our determination to raise awareness about the Group's activities and interests, while demonstrating utmost respect for the legitimacy of other stakeholders' representatives and the interests they represent. Through these endeavors, we aim to foster a collaborative and inclusive environment that promotes transparent dialogue and mutually beneficial outcomes.

Given the embryonic state of regulation and the relative maturity of the hydrogen sector, it is crucial for McPhy to engage in regulatory monitoring, actively contribute to collective initiatives aimed at shaping the market and participate in hydrogen sector events. These activities are significant as they enable McPhy to stay informed about the regulatory landscape, influence policy developments, and establish itself as a key player in the hydrogen sector.

Private players have a vital role to play in enriching the public debate by providing valuable expertise through impact assessments and well-founded positions on draft regulations. The expertise of private players in the hydrogen sector is essential for facilitating an informed and diverse dialogue with public authorities on regulatory initiatives. Like many players along the hydrogen production value chain, McPhy contacts or is contacted by public decision-makers to contribute to more effective regulations, especially to foster the energy transition and accelerate green reindustrialization.

Organization

The responsibility for coordinating lobbying activities and ensuring compliance with this policy is assigned to a Public Affairs Manager, reporting to the Strategy Department. The Public Affairs Manager:

- coordinates the preparation of McPhy's positions on regulatory and legislative developments, particularly in the context of consultations organized by the public authorities;
- monitors and/or leads lobbying actions at Group level to the relevant authorities;
- monitors budgets and expenditures relating to the representation of interests;
- follows McPhy's contributions to the work of associations related to the interests that McPhy represents.

The Public Affairs Manager ensures compliance with legal obligations and the following principles concerning the representation of interests.

Regulatory compliance, ethics and transparency

Ethics

The representation of interests by McPhy or third parties on its behalf is conducted in strict compliance with the principles of transparency (cf. below), probity and integrity.

McPhy undertakes that its interest representatives:

- Refrain from offering or giving to the authorities gifts or benefits of any significant value;
- Refrain from inciting the authorities to violate the ethical rules applicable to them;
- Refrain from any approach to these persons with a view to obtaining information or decisions by fraudulent means;
- Refrain from obtaining or attempting to obtain information or decisions by deliberately communicating false information or deceive these persons;

- Refrain from organizing events or meetings in which the speaking arrangements of public officials are linked to the payment of remuneration in any form whatsoever;
- Refrain from selling to third parties copies of documents originating from public authorities or from using letterheads and logos of these public authorities unduly.

Transparency

Our interactions with public stakeholders are conducted in strict compliance with the principle of transparency.

McPhy Group complies with national or supranational provisions relating to transparency registers by regularly reporting its activities and actions involving the representation of interests to the authorities.

In our main areas of lobbying activity, the authorities have a transparency register that specifies which types of interests are represented in the area, as well as the company, financial and human resources allocated to these activities. These registers in which McPhy is declared are listed below.

Area	Responsible authority	Web link
European Union	EU Transparency Register	Registre des représentants d'intérêts (europa.eu)
France	HATVP (High Authority for the Transparency of Public Life)	Fiche Mcphy Energy (hatvp.fr)
Germany	Deutscher Bundestag (German federal parliament)	Registereintrag "McPhy Energy"

Positions in line with McPhy's values

McPhy's activities are in response to three major challenges:

- The climate challenge, by offering solutions to support the development of renewable energies and to the decarbonization of industry and transport;
- The economic challenge in Europe, by participating in the emergence of an industrial ecosystem that creates sustainable jobs;
- The challenge of energy sovereignty, by developing solutions to reduce dependences on imported hydrocarbons.

The positions taken by McPhy to public authorities are consistent with these ambitions.