RESPONSIBLE LOBBYING POLICY

Version	Date
Rev. 01	05/07/2026

1. Introduction and scope

SOP S.r.l. Società Benefit carries out institutional representation and lobbying activities within its sector of reference, in particular in relation to issues of environmental sustainability, air quality and innovation in livestock farming and agriculture, as well as the protection and regeneration of terrestrial and marine ecosystems, and biodiversity. The policy applies to all institutional representation and advocacy activities carried out by SOP, in Italy and internationally, either directly or through third parties acting on its behalf.

For the purposes of this policy, «lobbying» and «advocacy» mean structured and organised activities, beyond normal Public Relations activities, aimed at guiding public decisions by making them more aware, responsible and informed - consistent with the definition adopted by B Lab and drawn from Transparency International's Corporate Political Engagement Index - carried out either by communicating, directly or indirectly, with officials, public decision-makers or their representatives, or by seeking to inform public opinion, beyond ordinary marketing and communication practices, in order to make it aware of the impact that certain legislative or regulatory choices have on the community. The definition also includes indirect lobbying carried out through intermediaries, such as consultants, trade associations and other representative organisations.

With this policy, SOP sets out the principles, methods and controls governing such activities, to ensure their consistency with the company's values and with its status as a Società Benefit and certified B Corp, and with the Organisation, Management and Control Model adopted pursuant to Legislative Decree 231/2001. These activities are also consistent with the impact commitments undertaken by SOP, in particular with its alignment with the 17 United Nations Sustainable Development Goals (SDGs), the United Nations Global Compact and B Lab standards. SOP undertakes to carry out lobbying activities exclusively in forms that contribute to a positive social and environmental impact and that do not undermine these commitments. This policy applies to the directors, staff and collaborators of SOP, as well as to consultants and other third parties acting in the name or on behalf of the company in its relations with institutions.

2. Principles of responsible lobbying

SOP carries out lobbying activities exclusively to contribute to a positive impact on society and the environment. The positions expressed by SOP towards institutions, regulatory bodies and public decision-makers are consistent with the company's mission and aimed at improving sustainability practices in the agricultural and livestock sector.

In line with the main international references on responsible lobbying - B Lab standards, the OECD principles for transparency and integrity in lobbying and the Responsible Lobbying Framework - SOP bases its institutional representation on five principles: (i) legitimacy: SOP intervenes exclusively on issues on which it has expertise, data and direct experience, declaring the interest it represents; (ii) consistency: the positions supported before stakeholders are consistent with the company's mission, its public sustainability commitments and its external

communications; (iii) transparency: SOP always makes itself and the interests it represents identifiable and ensures the traceability of its activities, as provided for in point 6; (iv) integrity: activities are conducted with honesty and fairness, without undue pressure or improper incentives, as provided for in point 4; (v) accountability: SOP is accountable for its lobbying activities to its governing bodies and its stakeholders, through the supervision, verification and reporting mechanisms provided for in this policy.

SOP's approach to institutional representation is based on scientific data and reliable information, deriving in particular from peer-reviewed studies produced or promoted by the company and from research activities, from recognised international standards and from public data from authoritative sources. Every public or institutional position expressed by SOP is supported by verifiable technical and scientific evidence.

3. Political contributions

SOP does not make, and does not plan to make, political contributions, whether financial or in-kind, to parties, candidates, committees or political organisations of any kind. Any exceptions to this approach may be adopted exclusively by resolution of the Board of Directors and will be made public, together with the relevant amount and beneficiary.

4. Integrity

4.1 Anti-corruption and anti-bribery

SOP conducts its lobbying activities in full compliance with anti-corruption and anti-bribery principles, as also set out in the Code of Ethics and in the Organisation, Management and Control Model adopted pursuant to Legislative Decree 231/2001. It is forbidden to offer, promise or give, directly or indirectly, money, goods or other benefits to public officials or institutional decision-makers in order to unduly influence their decisions.

4.2 Gifts, hospitality and other benefits

In its relations with public officials, institutional decision-makers and their staff, SOP neither offers nor accepts gifts, hospitality or other benefits. Any invitations to events, conferences or company visits are solely for informative and demonstrative purposes, take place transparently and are documentable.

4.3 Conflicts of interest and revolving door

SOP prevents and manages situations of conflict of interest, including potential or perceived ones, that may arise in institutional representation activities. Anyone acting on behalf of SOP is required to promptly declare to the CEO any relevant conflict situation. When assessing the possible appointment of persons who have held public office or functions at administrations with which SOP has relations (so-called revolving door), SOP examines in advance the related opportunity and compliance aspects, in accordance with the cooling-off periods provided for by applicable legislation.

5. Relations with appointed consultants and intermediary organisations

5.1 Appointed external consultants

Lobbying activities and dialogue with institutions are mainly entrusted by SOP to specialised external consultants, bound to the company by a regular contract. The consultants have adhered to SOP's 231 Model, undertaking the same compliance obligations as internal staff with regard to anti-corruption, transparency and fairness in institutional relations.

The consistency of the consultants' conduct with the principles of this policy is a contractual condition. SOP reserves the right to periodically verify such consistency and to terminate the relationship in the event of a breach of the principles defined herein.

5.2 Intermediary organisations (trade associations, consortia and representative bodies)

SOP is a member of, or collaborates with, trade associations, consortia, chambers of commerce and other organisations that may carry out activities representing the interests of the sector. SOP verifies that the public and lobbying positions taken by these organisations are consistent with the principles of this policy and with its sustainability commitments.

To this end, SOP: (i) periodically examines the relevant positions expressed by the organisations of which it is a member; (ii) in the event of misalignment, represents its own position within the organisation and, where appropriate, makes it public, dissociating itself from inconsistent positions; (iii) considers as an inviolable limit («red line») the organisation's support for positions that conflict with the protection of public health and the environment or with SOP's impact commitments. Should a misalignment of such seriousness prove irreconcilable, SOP will consider suspending or terminating its membership or collaboration.

6. Transparency and traceability

SOP ensures the traceability of its organised institutional representation activities. To this end, it keeps an internal register of relevant institutional interactions, in which the counterpart, subject and main outcomes of each contact are recorded. The register is kept under the responsibility of the CEO, with the support of the appointed external consultants, and is made available to the Board of Directors on the occasion of the checks provided for by this policy. Impromptu meetings or discussions taking place during public events are not recorded in the register.

Position papers, contributions to public consultations and technical documents submitted by SOP to institutions clearly state the source of the data used and, where appropriate, are published on the company website.

7. Approval and review of the policy

This policy is approved by SOP's Board of Directors. The policy is reviewed whenever significant organisational changes require it to be updated. In any case, the policy is reviewed at

least every two years; any substantial amendment is approved by the Board of Directors and the updated version is republished.

8. Governance, control and risk management

8.1 Responsibilities

The Chairman and CEO, Marco Poggianella, is responsible for implementing and complying with this policy in the operational management of lobbying activities, including decisions on initiatives carried out directly by SOP or through the appointed external consultants.

The Board of Directors exercises overall supervision over the application of the policy and assesses its adequacy during the reviews provided for in point 7.

8.2 Implementation

SOP applies this policy through a structured process in which lobbying and institutional dialogue opportunities, whether autonomous or proposed by the appointed external consultants, are approved by the CEO before being initiated. Public initiatives and participation in technical working groups or conferences may occasionally also involve other internal SOP figures, who act in accordance with the principles of this policy and under the coordination of the CEO.

All SOP staff have adhered to the 231 Model, which constitutes the common reference framework for anti-corruption, transparency and fairness in relations with institutions. SOP further undertakes to include in its contracts with the appointed external consultants an explicit reference to the principles of responsible lobbying defined in this policy, in addition to the obligations already provided for by the 231 Model.

8.3 Management of non-compliance risks

SOP identifies and manages the risks of non-compliance with this policy through the CEO's direct control over lobbying activities and through the contractual obligations to which the external consultants have adhered in relation to the 231 Model. The most significant issues are brought to the attention of the Board of Directors, which assesses their impacts and any corrective actions.

8.4 Compliance verification

Compliance with the provisions of this policy is periodically verified by the CEO, including through direct discussion with the external consultants appointed for institutional representation activities. The Board of Directors is informed of the results of such verification.

8.5 Reporting

Internal and external stakeholders may report any concerns regarding SOP's business conduct and lobbying practices through the reporting mechanism provided for by the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, as also set out in the

Code of Ethics. The reporting channel is accessible to all stakeholders - including workers, customers, local communities, investors and civil society organisations - and is managed in compliance with the protections provided for by whistleblowing legislation (Legislative Decree 24/2023), which guarantees the confidentiality of the whistleblower and the prohibition of retaliation. Reports relating to lobbying activities are examined and handled according to the same procedures.

8.6 Training

SOP ensures that all persons involved in institutional representation activities - the CEO, any internal staff involved and the appointed external consultants - are familiar with the contents of this policy and receive adequate updates whenever it undergoes a substantial revision. The principles of the policy are also recalled during the internal coordination meetings that precede the main institutional initiatives.

8.7 Periodic reporting

On an annual basis, the CEO reports to the Board of Directors on the institutional representation activities carried out, the issues addressed, the main counterparts and the application of this policy. The essential elements of this reporting are included, where relevant, in the annual impact report prepared by SOP as a Società Benefit, for the benefit of all stakeholders.

9. Publication

This policy is published in the "Ethics, Responsibility and Transparency" section of the company website, accessible to all stakeholders.