

Climate Advocacy Report

May 21, 2025



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Forward-looking statements

The statements in this report relating to matters that are not historical facts are forward-looking statements. These forward-looking statements are based upon assumptions of management of LYB, which are believed to be reasonable at the time made and are subject to significant risks and uncertainties. When used in this report, the words “estimate,” “believe,” “continue,” “could,” “intend,” “may,” “plan,” “potential,” “predict,” “should,” “will,” “expect,” and similar expressions are intended to identify forward-looking statements, although not all forward-looking statements contain such identifying words. Actual results could differ materially based on factors including, but not limited to, market conditions, the business cyclicality of the chemical, polymers and refining industries; the availability, cost and price volatility of raw materials and utilities, particularly the cost of oil, natural gas, and associated natural gas liquids; competitive product and pricing pressures; labor conditions; our ability to attract and retain key personnel; operating interruptions (including leaks, explosions, fires, weather-related incidents, mechanical failure, unscheduled downtime, supplier disruptions, labor shortages, strikes, work stoppages or other labor difficulties, transportation interruptions, spills and releases and other environmental risks); the supply/ demand balances for our and our joint ventures’ products, and the related effects of industry production capacities and operating rates; our ability to manage costs; future financial and operating results; benefits and synergies of any proposed transactions; receipt of required regulatory approvals and the satisfaction of closing conditions for our proposed transactions; final investment decision and the construction and operation of any proposed facilities described; our ability to align our assets and expand our core; legal and environmental proceedings; tax rulings, consequences or proceedings; technological developments, and our ability to develop new products and process technologies; our ability to meet our sustainability goals, including the ability to operate safely, increase production of recycled and renewable-based polymers to meet our targets and forecasts, and reduce our emissions and achieve net zero emissions by the time set in our goals; our ability to procure energy from renewable sources; our ability to build a profitable Circular and Low Carbon Solutions business; and potential governmental regulatory actions. Additional factors that could cause results to differ materially from those described in the forward-looking statements can be found in the Risk Factors section of our Form 10-K for the year ended December 31, 2024, which can be found at www.lyb.com on the Investor Relations page and on the Securities and Exchange Commission’s website at www.sec.gov. There is no assurance that any of the actions, events, or results of the forward-looking statements will occur, or if any of them do, what impact they will have on our results of operations or financial condition. Forward-looking statements speak only as of the date they were made and are based on the estimates and opinions of management of LYB at the time the statements are made. LYB does not assume any obligation to update forward-looking statements should circumstances or management’s estimates or opinions change, except as required by law.

Introduction

At LYB, we are committed to leading in value creation from low carbon products, delivering solutions to advance our customers' climate ambitions and reducing greenhouse gas (GHG) emissions from our global operations and value chain. We support global objectives to limit temperature rise to well below 2° C above preindustrial levels and to pursue efforts to limit the temperature increase even further to 1.5° C. Our climate targets are grounded in the latest climate science and guided by the Science Based Targets initiative (SBTi). Our goals include a 42% reduction in scope 1 and 2 emissions and a 30% reduction in scope 3 emissions by 2030 relative to a 2020 baseline.

In a hard-to-abate sector such as the chemical industry, achieving these goals will require significant investment in technologies with high upfront capital and operational costs such as hydrogen, process electrification, and carbon capture and storage. This investment needs to be supported by regulatory frameworks and other financial instruments as well as market demand drivers for low-carbon products. Moreover, certification standards and chain of custody frameworks need to be in place for low-carbon products.

Industry associations and policymakers have the opportunity to work together to reduce emissions while also maintaining competitiveness, and we believe public policy plays a critical role in addressing the challenge of climate change. LYB actively participates in the political process through direct outreach to policymakers, as well as indirectly through trade associations. In 2023, we published our first-ever review and evaluation of trade association alignment with our climate policy positions. At that time, we committed to a full update and re-evaluation of trade associations vs. our climate policy positions every two years.

In 2025, we are publishing our second report which builds on and improves our first report by providing additional information regarding our governance framework supporting climate policy engagement, expanding our trade association evaluations under a revised and more robust evaluation format, including the evaluation of additional trades, and providing updates on progress made in influencing trades to align with our climate policy positions.

In addition, since our last report we have published numerous public policy positions on important climate issues for our company, including carbon capture and storage, hydrogen, and low carbon electricity, electrification and electrical infrastructure. These policy positions can be found on our [website](#).



Executive summary

Our first review in 2023 covered 10 trade associations and the World Economic Forum¹. This review covers all of the same trade associations that were found to engage on climate issues, while adding additional trade associations based on our enhanced process for assessing trades for inclusion. The total number of trade associations evaluated as part of this report is 14.

Texas Chemistry Council (TCC) was evaluated as part of the first report but was excluded in this second report. TCC was found to have no engagement on any climate issues during the assessment performed for the first report. Following the first assessment, we contacted TCC who informed us that they have no intention to take a position on, or advocate for, climate issues. As such, TCC has been eliminated from this second report.

As part of our enhanced assessment process, we revised our categories used to classify trade association alignment and added an assessment of the trade association's engagement intensity. The engagement intensity assessment showed that of the 14 trade associations, two trades had no engagement on climate issues. Of the remaining 12 trade associations assessed, nine are classified as having no misalignment with our climate policy positions, one was classified as having mixed alignment on one climate policy priority and two were classified as having mixed alignment on more than one climate policy priority.

Of the 12 trade associations that had some level of engagement, three were found to have low engagement and three were found to have medium engagement. The remaining six had high engagement.

The enhanced assessment process used in this report resulted in a change of alignment outcomes from the first report for some trades. For example, in the first Climate Advocacy report AFPM was given a rating of "misaligned". In this second report, the "misaligned" category was replaced with a new category ("obstructive"), and AFPM was given a rating of "mixed" alignment with more than one climate policy priority. In the process of performing assessments, we have found that the positions of trades on climate policy issues are often nuanced and rarely fully obstructive or "misaligned". To this end, of the trades assessed in this report using the enhanced process, none were found to be fully obstructive. However, we have retained the "obstructive" assessment rating for the purposes of completeness and for potential use in future reports.

Where we have found mixed alignment on one or more climate policy priorities, or low engagement, we have described the actions we have either already taken or will take to address this. These are included in the detailed trade association review portion of the report. Where trades have no engagement on climate policy issues and express no intent to be active in the future, these trades may be removed from future climate policy engagement reports.

Key findings

Most of the Trade Associations reviewed as part of this report have top-line statements that are generally supportive of emissions reductions. However, not all Trade Associations evaluated have consistently backed up these statements through their engagement activities. We recognize that in some cases, some climate policies will result in potential adverse business impacts (both near-and long-term) for certain members of these Trade Associations and that the Trade Association is unlikely to give full support for certain climate policies. Where this is the case, we will continue to engage with Trade Associations that have mixed alignment with our climate policy positions to develop constructive and pragmatic policies that deliver actual emissions reductions in a manner that minimizes the potential for negative business or competitive impacts.

1. The World Economic Forum was not evaluated as part of this report as LYB is no longer a member.

Our global climate policy positions

Our climate policy positions remain largely the same as in 2023 but have been expanded and/or clarified. We continue to support effective policies to reduce emissions and achieve our global climate ambitions. Our strategy for achieving our climate ambitions relies on several key enablers. These include stable positions and policies independent of political cycles and the development of necessary infrastructure and technologies to support the transition toward net zero. Our global climate policy positions serve as a framework to guide our advocacy with governments and within industry associations.

In a hard-to-abate sector such as the chemical industry, achieving these goals will require significant investment in technologies with high upfront capital and operational costs such as hydrogen, process electrification, and carbon capture and storage. Investment in technologies supported by regulatory frameworks, subsidies and other financial mechanisms, coupled with market demand drivers for low carbon products including the right certification standards and chain of custody frameworks, is essential to achieve these goals. Industry associations and policymakers have the opportunity to work together to align the sector with emissions reductions goals while also maintaining competitiveness.

Our climate policy positions include:

- 1. Emission reduction and net zero emissions:** LYB supports global objectives to limit temperature rise to well below 2° C above preindustrial levels and to pursue efforts to limit the temperature increase even further to 1.5° C. We support emission reduction targets in line with these goals that help the world reach net zero by 2050.
- 2. Hydrogen:** LYB supports policies encouraging the further development of affordable and reliable low carbon hydrogen. Hydrogen technologies are a transformative lever for LYB and the chemical industry in reducing greenhouse gas (GHG) emissions.
- 3. Carbon capture, utilization and storage (CCUS):** LYB supports policies promoting the development of a carbon capture and storage infrastructure at the scale required to enable the storage of GHG emissions where no technical or economical alternative exists. CCUS allows LYB to take large steps to decarbonize using mature technologies. Longer term, we believe in the potential of CO₂ utilization as an alternative to permanent storage. CO₂ utilization not only has the potential to reduce scope 1 and 2 emissions through CO₂ capture, but also to reduce scope 3 emissions by converting the captured CO₂ to higher value chemicals that could replace current fossil-based feedstocks. While CCUS technologies will help accelerate progress towards net zero, these technologies need to be integrated in a way that allows for optionality as different technologies continue to develop and net zero pathways evolve.
- 4. Emerging technologies:** LYB supports policies accelerating the development of emerging technologies which enable the reduction of emissions from carbon intensive, large scale manufacturing needs, including processes and adjacent infrastructure to enable cost-effective use of CO₂ at scale for the production of higher value chemicals. As LYB actively explores emerging technologies, we welcome government action to facilitate collaboration opportunities for industry and academia to further-develop feasible technologies.
- 5. Low carbon renewable energy and electrification:** LYB supports policies promoting significant increases in low carbon and renewable electricity production and grid capacity upgrades needed to support the high electricity demands tied to the electrification of processes. LYB also supports policies that encourage further development of affordable, reliable baseload generation from other non-emitting sources. LYB supports a regulatory environment and incentive structure that provides certainty for public and private-sector investment, by incentivizing the use of Power Purchase Agreements (PPAs), which are key to securing procured electricity from renewable sources.
- 6. Carbon pricing:** LYB supports a carbon pricing scheme that effectively facilitates a transition to a net zero economy. We believe a global carbon price provides the most efficient, fair and uniform way to reduce GHG emissions at scale. In the absence of a global price on carbon, in the near-term, we support regionally implemented cap-and-trade programs and effective carbon leakage protection measures to ensure our production remains competitive. We use an internal carbon price as a key enabler for us to progress towards our 2030 and 2050 scope 1 and scope 2 targets, allowing us to assign a monetary value to our GHG emissions and integrate this value into our business planning. We anticipate an increased value for carbon, driven by expected increases in global carbon regulations and growing consumer willingness to pay a premium for low carbon products.

Governance framework

We have a steadfast commitment to doing business in an ethical and responsible manner. This value is reflected in our Code of Conduct and policies such as our Financial Code of Ethics and Corporate Governance Guidelines.

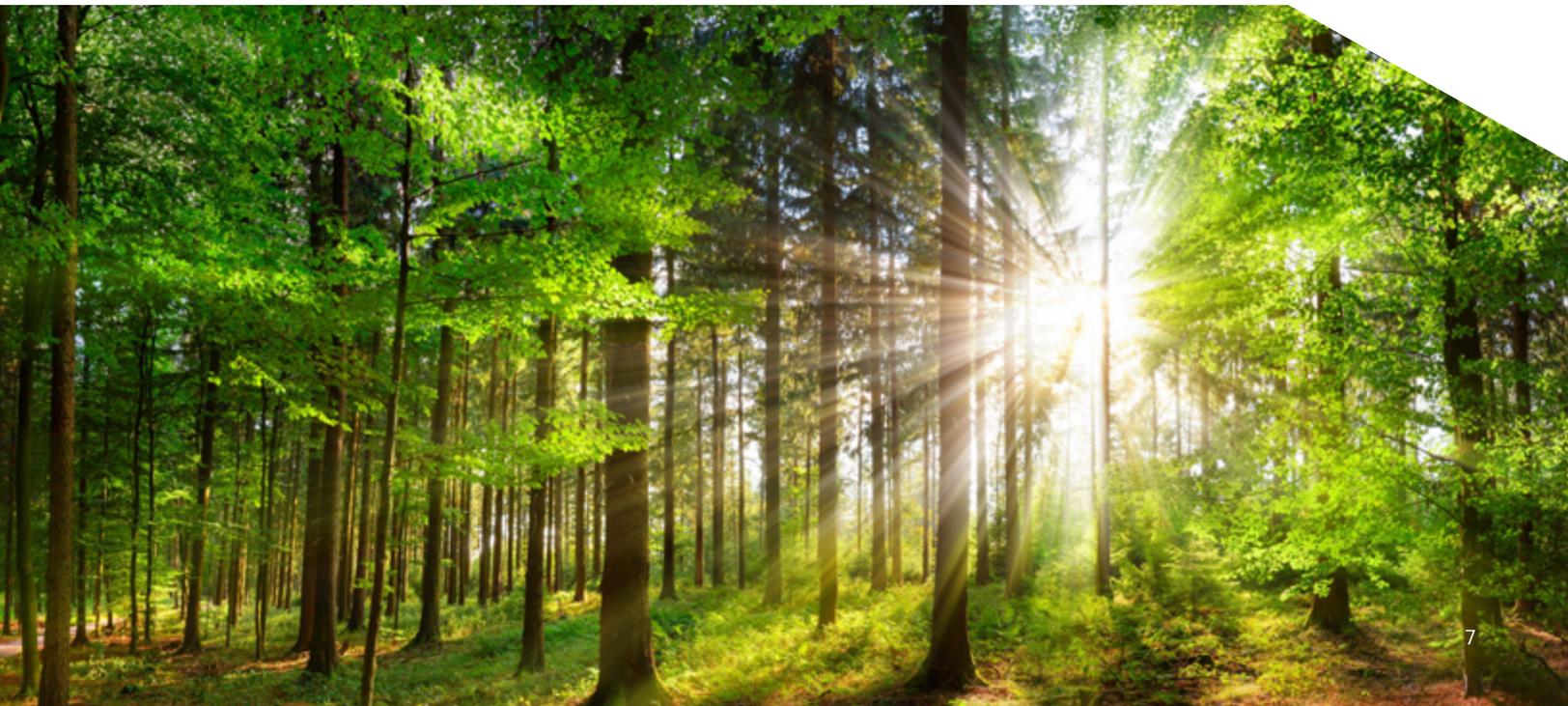
Effective board oversight is critical to sound corporate governance and responsible, sustainable growth. Our Board of Directors is comprised of 11 independent directors, plus our CEO and is responsible for providing governance and oversight over the strategy, operations and management of the company.

The Board, acting in the interests of LYB and taking into account the relevant interests of our stakeholders, supervises and advises our CEO and other executives as they manage the day-to-day affairs of the company and set the direction of the company's business. The Board and its committees regularly communicate with senior leadership, including our CEO and the executives leading business functions, relaying the information necessary for a full understanding of the company's affairs, including information regarding the company's strategy, risk management, cybersecurity and environmental, social and governance (ESG) matters.

At the management level, our CEO oversees the company's ESG profile through regular reporting and discussion on key topics and initiatives among members of his Executive Committee. ESG matters impact, and are impacted by, all of our operations, with each function playing a role in

identifying relevant opportunities, managing associated risks and contributing to our overall sustainability program. The Executive Committee includes, among others, our Executive Vice President, Sustainability and Corporate Affairs, with responsibility for sustainability strategy and reporting, our Executive Vice President, CLCS, who is building and leading a scalable, circular and low-carbon solutions business, and our Executive Vice President, Operational Excellence and HSE, who is responsible for the execution of our plans to reach our interim and long term scope 1 and 2 emissions targets. Our Executive Committee meets regularly to review strategies, policies and risks related to sustainability and ESG topics, including climate-related topics. The Vice President and Chief Sustainability Officer is responsible for the management of sustainability programs, strategy, and reporting and is supported by a global group of dedicated employees. This group collaborates with leaders across the organization, including the members of the Executive Committee and the Carbon Value Capture and Creation Steering Committee, to bring together the necessary expertise and skills.

The Carbon Value Creation and Capture Steering Committee, reporting to our Executive Vice President of Operational Excellence and HSE, executes plans to achieve our scope 1 and scope 2 GHG emission reduction goals. The Global Sustainability Team oversees progress on our scope 3 targets, working closely with internal stakeholders, business segments, procurement and supply chain.



Our principles for climate advocacy

In accordance with our values and our [Code of Conduct](#) and [Principles for Public Policy](#), we engage directly with governments, regulators and elected officials to advocate on matters that affect us, our employees, our customers and our shareholders. Our lobbying activities are guided by transparency and integrity. We seek to enable climate policy that encourages investment in technologies with high upfront capital and operational costs such as hydrogen, process electrification and carbon capture and storage. We also advocate for regulatory frameworks and market demand drivers for low-carbon products supported by necessary certification standards and chain of custody frameworks. We are committed to promoting climate policies that align with our policy goals, including our policy positions on emission reduction and net zero emissions, and actively advocate for such policies through our direct lobbying.

We are a member of many trade associations around the world. We value our participation in trade associations, which enable us to promote our priorities together with other companies and engage as an industry with governments and regulators. In addition to engaging in public policy and regulation, trade associations also play a key role in developing best practices in health, safety, security and environmental performance. The policy positions that trade associations adopt are typically developed based on the majority view or a consensus among their membership.

With a wide range of differing views represented, it is unlikely that our policy positions will always exactly align with those of the trade associations in which we participate. Further, we have varied levels of participation and influence in the different trade associations in which we participate. However, we are committed to promoting climate policies that align with our climate policy positions and global emissions reduction goals and to actively advocate for such policies within the trade associations to which we belong. Further, we believe that our trade association memberships should be consistent with our climate positions and efforts to advance a net zero economy, and that it is our responsibility to evaluate our participation in trade associations and disclose misalignments.

LYB climate policy engagement

LYB has a structured process in place to ensure that our external engagement activities align with our environmental and sustainability commitments. Our VP of Government Relations, our legal compliance team and applicable executive leaders are responsible for approving membership in trade associations. Members of trade associations are required to complete annual training which details our climate policy positions and expectations for engagement with trades on these issues. In addition, any significant voting decisions require review and approval of the VP of Government Relations.

We support effective policies to achieve emission reduction targets in line with goals that help the world reach net zero by 2050. Our lobbying activities on climate and other areas are publicly reported and can be found as follows:

- EU Transparency Register under REG# 606644737858-48
- German Transparency Register under REG# R005987, via the German legal entity Basell Polyolefine GmbH
- Center for Political Accountability's Zicklin Index under the name LyondellBasell Industries NV
- Reporting quarterly on U.S. federal lobbying activities with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate - available by searching for "LYONDELL CHEMICAL COMPANY" as a "Registrant"
- <https://www.lyondellbasell.com/en/sustainability/public-policy-and-political-engagement/>

On the following pages are examples of actions LYB took towards advancing our climate policy objectives since the publication of the last report.

EU advocacy

Bonn Climate Change Conference (SB60) 10-13 June 2024

LYB engaged in the Bonn Climate Change Conference (SB60) as part of the official UNFCCC Business and Industry NGOs constituency group (BINGOs). Beyond the official negotiations where LYB could join as observer, LYB attended daily briefings coordinated by International Chamber of Commerce (ICC) to exchange views with business organizations and industry (BINGOs) on the outcome of the negotiations and private sector priorities, particularly carbon markets and climate finance. The business briefings also featured the participation of some key negotiators, including the EU negotiator on climate mitigation, and the COP29 Presidency negotiator and point of contact for the BINGO. LYB also engaged with other business organizations and NGOs during side events or informal meetings.

The Antwerp Declaration for a European Industrial Deal

LYB CEO Peter Vanacker, jointly with 73 industry leaders from 20 industrial sectors, signed the Antwerp Declaration in the presence of the Belgian Prime Minister and the European Commission President Ursula von der Leyen. This ten point declaration called on EU governments to revitalize Europe's competitiveness and stressed the central role of a circular economy. Mr. Vanacker also met with Mr. Enrico Letta, the former Italian prime minister and draft person of an independent report on the future of the EU Single market, to voice our position on the need to simplify and harmonize EU legislation to reduce costs and other administrative burdens.

EU high-level roundtable on industrial electrification and competitiveness

In December 2024, LYB Senior Vice President of Net Zero Transition Strategy and representatives from LYB EU Government Relations participated in a high-level policy roundtable in Brussels hosted by Eurelectric, the electricity industry association in Europe. The event gathered 20 CEOs and senior leaders from energy utilities, chemicals, aluminum, steel and cement sectors, alongside key EU policymakers to discuss shaping a resilient, competitive and electrified European industrial landscape in the context of the upcoming EU Clean Industrial Deal.

The discussion revolved around challenges and concrete solutions to promote a competitive and affordable electrification of the European energy system and industrial base, including how to de-risk investments in the electrification of the energy system, enable a market for Power Purchase Agreements (PPAs) and address high energy costs in Europe as well as cross-sectoral collaboration to

accelerate the transition to a low-carbon economy through electrification.

LYB had the opportunity to engage in discussions with Kurt Vandenberghe, the European Commission's Director General at DG CLIMA; Ditte Juul Jørgensen, the European Commission's Director General at DG ENER; Chris Bolesta, the State Secretary at the Polish Ministry of Climate & Environment (Poland led the EU Council Presidency in the first half of 2025); and Ann Mettler, Europe's Vice President of Breakthrough Energy and a Member of the European Parliament (MEP).

Fit for 55

In Europe, LYB engaged in climate advocacy discussions in support of electrification technologies and low carbon hydrogen, availability of renewable or low carbon electricity and infrastructure, and development of CCUS. Discussions focused on key topics for the company, mostly linked to the "Fit for 55" package, in particular the introduction of a Carbon Border Adjustment Mechanism (CBAM), the future of the Emission Trading System (ETS), the Renewable Energy Directive (RED III), carbon capture and storage/ carbon capture and usage) and the EU Industrial Carbon Management Strategy.

In the case of the RED III, we have advocated for cost-competitive low-carbon hydrogen and equal treatment between low-carbon and renewable hydrogen in the EU policy framework, as we see hydrogen as an important lever to reduce GHG emissions. We have explored ideas with the European Commission on how to enable the creation of markets for products produced from and with renewable fuels of non-biological origin (RFNBOs) such as renewable hydrogen and low-carbon hydrogen. We have supported legislative initiatives to increase the availability of high-quality low carbon hydrogen irrespective of its production route to support the reduction of GHG emissions at industrial sites, which we see as key in order to develop a hydrogen economy and ensure the hydrogen volumes necessary for GHG emission reductions at the scale necessary. The price and availability of low-carbon hydrogen is critical to realize our GHG emission reduction targets, and in particular at our emission intensive plants.

Carbon capture technologies are another key lever for LYB to reduce GHG-emissions, particularly from hard-to-abate emissions sources. Carbon capture provides the ability to take large steps to decarbonize, using mature technology. Investments in CCS must be made with urgency and accelerating these projects will require supportive governmental policies, subsidies, transparent and timely permit processing and improved community awareness

and education. We therefore have supported the further deployment of the EU Strategy for Industrial Carbon Management and have participated in the work of the European Commission working groups on Industrial Carbon Management and the EU Industrial Carbon Management Forum.

In the long term, LYB believes in the potential of valorizing captured CO₂ by bringing it back into the value chain and using it to manufacture high-value chemicals that could replace current fossil-based feedstocks and support the global transition to net zero. On Carbon Capture Utilization (CCU), LYB engaged with European Commissions officials and industry representatives in a roundtable organized by the European Commission (DG ENV) on the potential of CCU as an additional feedstock and pathway to decarbonize the plastics industry.

CBAM

We engaged with the European Commission through trade associations to support the simplification and improve the effectiveness of the current CBAM system. We are also engaging through trade associations on the possible extension of the CBAM to the chemicals sector. The current extension proposal fails to address indirect carbon costs and will lead to carbon and investment leakage. To be effective, any proposal to extend CBAM to the chemicals sector must cover full value chains and total CO₂ product emissions, ensure export competitiveness in compliance with WTO rules, and provide a workable implementation for the chemical industry. As production costs increase, EU climate

policy must strengthen carbon leakage provisions to ensure the necessary investments for the climate transition while safeguarding the industry's competitiveness in Europe.

EU national level advocacy

- In France, LYB signed two "Ecological Transition Contracts" with the French government (Ministry of Economy, Finance and Industry) in late 2023, which define objectives for the reduction of CO₂ emissions at our two sites in the south of France. Dialogues with the Minister cabinet and other high-level officials were scheduled throughout 2024 to support subsidies for our two major sites. A discussion with the authorities regarding the development of a specific subsidy scheme for large net zero projects for the manufacturing industry in France, which is expected to be finalized for 2025, is ongoing. LYB has also been involved in the pursuit of several studies of the Sirius program (supported by the French government): those studies address the prospects for large scale GHG-emission reduction in industry, including the necessary infrastructure.
- In Germany, we continue to engage with government officials from ministries and the Federal Chancellery, as well as members of parliament at federal and state (North Rhine-Westphalia) levels on the net zero roadmap for our sites in Germany. This is particularly true at Wesseling, where funding and supportive policies regarding new infrastructures and availability of low carbon energy sources are key enablers of decarbonization.

U.S. advocacy

In the United States, we engaged in climate policy discussions in support of policies that support energy transition, renewable portfolio standards and clean energy standards. LYB is directly involved in advocacy to advance CCUS in the U.S. to ensure a supportive regulatory framework for carbon reduction technologies as well as policies to support electricity market reforms to support renewable generation investments, innovation and grid reliability.

At a federal level, LYB engaged in climate policy discussions to support investments that spur low emissions technology in manufacturing, including through government policies that support and promote accelerated development of all types of low-carbon hydrogen. As a potential clean hydrogen user, we have advocated for specific changes to the 45V

Clean Hydrogen Production Tax Credit, to jump start clean hydrogen production and demand. 45V is key to enabling the availability of cost-competitive hydrogen supply, an important part of our pathway to reach net zero scope 1 and 2 GHG emissions.

An adequate supply of electricity from low-and zero-carbon sources is one of our four critical levers to reducing our GHG emissions. We believe that electrical infrastructure and capacity must increase in size, system management must be upgraded to meet growing demand and infrastructure planning must be enhanced. We evaluated policy proposals that would support this important lever in our GHG emissions reduction targets, laying the groundwork for future engagement with policymakers.

Industry association review

Selection process

Our first review in 2023 covered 10 trade associations and the World Economic Forum. This review covers all of the same trade associations who were found to engage on climate issues, while adding additional trade associations based on our enhanced process for assessing trades for inclusion. Following the first trade association review in 2023, we found that Texas Chemical Council does not engage in climate policy and would not in the future. This resulted in the removal of the Texas Chemistry Council from this year's analysis as noted above.

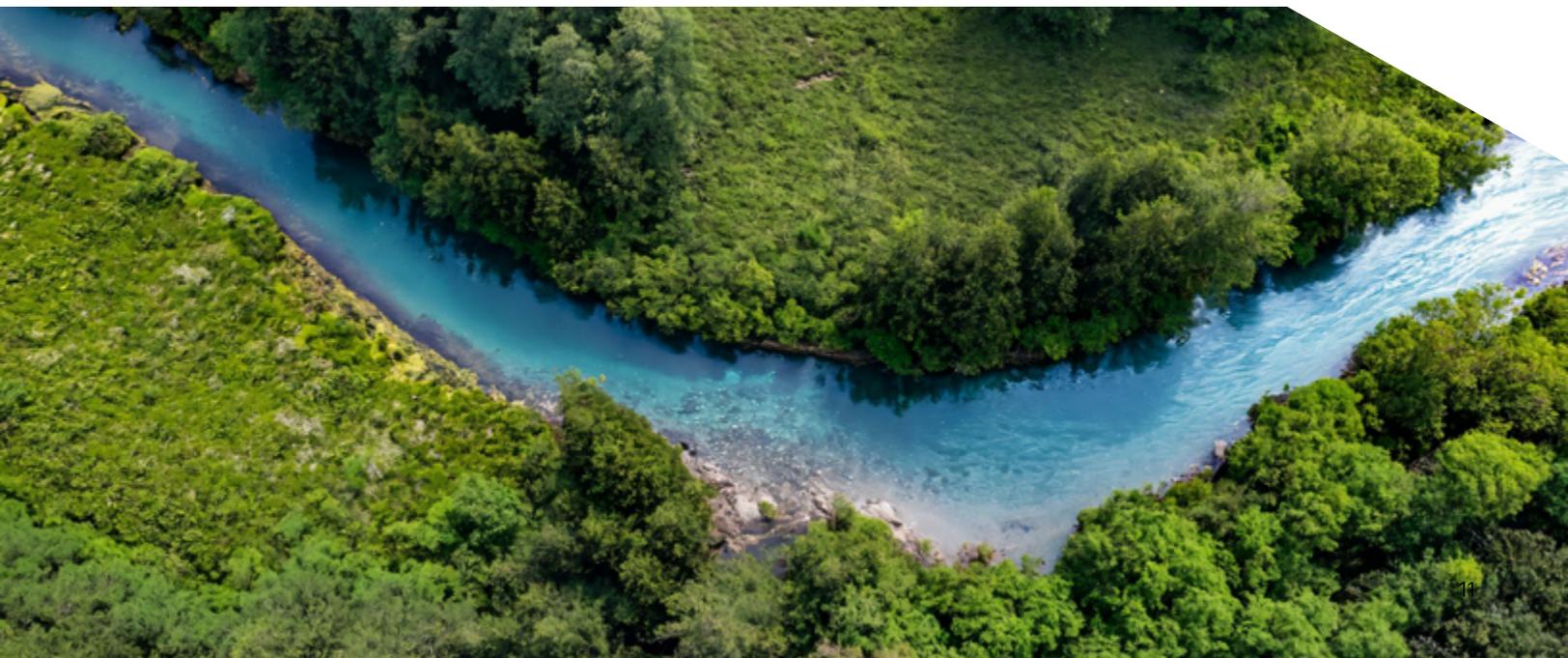
Trade associations were screened for inclusion in this review to prioritize trade associations that had a greater ability to shape policy and/or where LYB had a high level of influence. For example, the size of the LYB market where the association is based, LYB and/or the region's associated GHG emissions, and whether the trade represents sectors with high GHG emissions could indicate the trade's ability to shape policy. Similarly, our annual membership spend and whether LYB has a board seat or is a member of a critical committee could indicate our level of influence within the trade.

The following criteria were used to screen and score trades for inclusion:

1. An initial screening was conducted to remove trade associations based outside of our top global markets. The remaining trades were further evaluated as part of the evaluation selection process.
2. Each remaining trade was assigned a score on a 10 point scale based on a combination of:
 - a. Fees: The amount LYB spends on annual membership (five points).
 - b. Geography: The region(s) where the trade association operates and whether the region(s) align with key regions where LYB has business operations (five points).
3. The scores for the two categories were added to obtain a total score out of a possible 10. Associations scoring six or above were considered for inclusion. Some trades scoring six and above, but with no active engagement on climate policy issues, were included in this report as it is the company's position the included trades should consider taking a more active stance on climate issues going forward. In addition, some trades scoring less than six were included based on our knowledge of the trade's anticipated activities on climate policy issues.

The table below details how scores were assigned:

Score	1	2	3	4	5
Fees	<\$25k	\$25-50k	\$50-\$100k	\$100-\$250k	>\$250k
Geography	Local/State	AP/LATAM/UK	U.S./EU	Regional	Global



Based on this screening assessment, the following trade associations were included in this review:

Trade Association	Region	2024 Dues (USD)*	Geographical Scope	Score
American Chemistry Council (ACC)	United States	>\$5M (5)	U.S. (3)	8
American Fuel and Petrochemical Manufacturers (AFPM)	United States	\$1-2M (5)	U.S. (3)	8
Asian Clean Fuels Association (AFCA)	Asia Pacific	>\$250k (5)	AP (2)	7
Asociacion de Combustibles Eficientes de Latinoamérica (ACELA)	Latin America	\$100-250k (4)	LATAM (2)	6
Business Europe	European Union	\$25-50k (2)	EU (3)	5*
Chemical Industries Association	United Kingdom	\$50-100k (3)	UK (2)	5*
China Petroleum and Chemical Industry Federation (CPCIF)	Asia Pacific	<\$25k (1)	AP (2)	3*
Electricity Consumers Resource Council (ELCON)	United States	\$50-100k (3)	U.S. (3)	6
European Chemical Industry Council (Cefic)	European Union	\$1-2M (5)	EU (3)	8
International Council of Chemical Associations (ICCA)	Global	\$50-100k (3)	Global (5)	8
National Association of Manufacturers (NAM)	United States	>\$250k (5)	U.S. (3)	8
Plastics Europe	European Union	\$1-2M (5)	EU (3)	8
Plastics Industry Association	United States	\$100-250k (4)	U.S. (3)	7
United States Council for International Business (USCIB)	Global	<\$25k (1)	Global (5)	6

*Included due to anticipated activities in climate advocacy despite scoring lower than 6 points

Assessment methodology

For this review, each trade association included in the assessment was first evaluated against our climate policy positions. At a high level, this assessment determined whether the trade association’s stated positions were aligned with our positions. Next, we assessed the trade association’s engagement intensity. This review took place in January and February, 2025. Trade association policy positions occurring after this time were not included in the review.

The determination of trade association alignment against the LYB climate policy positions is not always straightforward. In some instances, trade associations will be unlikely to give full support for certain climate policies taken by LYB that may adversely impact its members. Where a trade association opposes a specific LYB climate policy position (this could occur where the proposed policy will adversely impact the competitiveness of its members), we believe the trade association should engage constructively with policymakers to develop policy options that enable the industry’s

competitiveness while still effectively achieving climate policy objectives.

During the course of this assessment, we also evaluated whether a trade association’s public actions and engagement were consistent with its top-line statements. We also sought to determine the engagement intensity of the trade on climate policy i.e. whether the trade association was an “active” or “passive” participant.

The material used to evaluate our trade associations comes from publicly available sources found by us in the course of the review. We also used the LobbyMap² platform. Using this data, LYB reviewed each association’s engagement on specific policies in detail to assess for alignment with our climate policy positions and active or passive participation. We recognize that our efforts to evaluate and align our trades may miss information. We will continue to work with trades evaluated as part of this effort to ensure the transparency of our efforts to evaluate and assess them as well as to increase the visibility of their climate policy work where not readily apparent.

2. LobbyMap is created by InfluenceMap, an independent think tank that tracks corporate and industry association climate policy engagement.

Results

The table below gives an overview of the results. The full industry association analysis can be found in the appendix.

Climate policy engagement/ intensity	Mixed alignment on more than one climate policy priority	Mixed alignment on one climate policy priority	No misalignment
High engagement	AFPM	NAM	ACC Business Europe CEFIC USCIB
Medium engagement	ELCON		Chemicals Industry Association ICCA
Low engagement			CPCIF ACFA Plastics Europe
No engagement seen			ACELA Plastics Industry Association

This grid provides a summary of each of the evaluated trade associations engagement intensity and alignment. The vertical axis represents each association’s engagement intensity based on InfluenceMap’s scores, while the horizontal axis represents each association’s alignment with LYB climate policy priorities. Ideally, LYB would like to move trade associations to the upper right-hand quadrant over time through more active public engagement in climate policy or by working with them to take steps to align with our climate policy priorities.

The following additional summary table details how each of the 14 trade associations were engaged and aligned with our climate policy priorities during the time period for which this

assessment was performed (June 2023-January 2025). For each of our climate policy priorities, trade associations were assigned one of the following ratings:

1. Constructive (trade association is actively engaged and aligned with our position)
2. Obstructive (trade association is actively engaged but misaligned with our position)
3. Mixed (trade association is actively engaged but with mixed alignment)
4. Inactive (trade association is not actively engaged on this topic)

Trade Association	Region	Emission Reduction	Hydrogen	CCUS	Technologies	Low Carbon Energy	Carbon Pricing
American Chemistry Council (ACC)	United States	Constructive	Constructive	Constructive	Constructive	Constructive	Constructive
American Fuel and Petrochemical Manufacturers (AFPM)	United States	Mixed	Constructive	Constructive	Mixed	Inactive	Inactive
Asociacion de Combustibles Eficientes de Latinoamérica (ACELA)	Latin America	Inactive	Inactive	Inactive	Inactive	Inactive	Inactive
Asian Clean Fuels Association (ACFA)	Asia Pacific	Constructive	Inactive	Inactive	Inactive	Inactive	Inactive
Business Europe	European Union	Constructive	Constructive	Constructive	Constructive	Constructive	Constructive
Chemicals Industry Association	United Kingdom	Constructive	Constructive	Constructive	Constructive	Constructive	Constructive
China Petroleum and Petrochemicals Association (CPCIF)	Asia Pacific	Constructive	Inactive	Inactive	Inactive	Constructive	Inactive
Electricity Consumers Resource Council (ELCON)	United States	Inactive	Inactive	Inactive	Mixed	Mixed	Inactive
European Chemical Industry Council (Cefic)	European Union	Constructive	Constructive	Constructive	Constructive	Constructive	Constructive
International Council of Chemical Associations (ICCA)	Global	Constructive	Constructive	Constructive	Constructive	Constructive	Inactive
National Association of Manufacturers (NAM)	United States	Mixed	Constructive	Constructive	Constructive	Constructive	Inactive
Plastics Europe	European Union	Constructive	Inactive	Inactive	Inactive	Inactive	Inactive
Plastics Industry Association	United States	Inactive	Inactive	Inactive	Inactive	Inactive	Inactive
United States Council for International Business (USCIB)	United States	Constructive	Constructive	Constructive	Constructive	Constructive	Constructive

Addressing misalignment

Where a trade association that LYB is a member of may be advocating for policy that runs counter to the LYB climate policy position, we will engage the trade association by:

1. Communicating with the trade association detailing how and why their position is misaligned.
2. Determine if their position(s) can change, and, if so, what the timeline for change is.
3. Provide recommendations for how the industry association can address misalignment.
4. Periodically review progress and actions taken.

This engagement process will be managed by the business leader(s) in important trade group leadership positions as well as by our Government Relations team.

Where a trade association's position cannot be made consistent with ours, or no improvement is being made to

reach alignment over a 24-month period, we may choose to take action including withdrawal of our membership and making our withdrawal public.

Alternatively, LYB may decide that its interests are best served by retaining membership. LYB may make a public statement regarding this misalignment and continue to work with the industry association to encourage alignment with our climate policy positions.

In other cases, associations may be generally aligned with our climate policy positions, but with a low level of engagement. In these cases, LYB will work with the trade association to determine whether the trade should be more active on certain climate policy issues. If a trade is not engaging at all on climate policy issues and expresses no intent for future activity, we may remove them from future reports.

Detailed trade association review

American Chemistry Council (ACC)

LYB role(s) and membership benefits	Board seat and various Committees. Membership with ACC allows LYB to benchmark against the broader chemical industry and beyond given the breadth and depth of the membership roster. LYB benefits from participation in Responsible Care, HSE and sustainability initiatives, product and market sector support and advocacy efforts among other benefits.
Top Line positions on climate policy	ACC continues to support net zero emissions economy-wide by 2025. ³ ⁴ ACC also supports technology, energy, and feedstock-neutral policies that offer multiple pathways to a net-zero economy. ⁵
High level advocacy positions	ACC's climate policy principles remain unchanged from 2023. ⁶
Alignment assessment	No misalignment with LYB climate policy positions.
Engagement intensity	High (rated as Active/Strategic Engagement by LobbyMap)
Explanation	ACC has voiced support for the Inflation Reduction Act's 45V tax credit, paired with the Bipartisan Infrastructure Law's hydrogen hub infrastructure program as essential for investment in a clean hydrogen economy. In its February 2024 comments to the Internal Revenue Service (IRS), ACC advocated for the continued role of fossil gas in hydrogen production, but in the context of allowing a hydrogen producer with more efficient carbon capture technology to take credit for co-produced steam created during the production process as a result of its carbon capture technology being more efficient. ⁷ In comments to the Department of Energy in June of 2024, ACC re-emphasized the need to ensure the final 45V tax credit guidance incentivizes investment in all forms of clean hydrogen production technologies that can meet the GHG emissions standards, regardless of the energy source, feedstock or process. ⁸
Additional information	ACC's LobbyMap profile
Follow-up actions	LYB will continue to remain a member of ACC, while engaging the association on climate and energy transition topics and will continue to track alignment between ACC's climate and energy transition positions and our own.

3. <https://www.americanchemistry.com/better-policy-regulation/climate-change>

4. <https://www.americanchemistry.com/chemistry-in-america/news-trends/press-release/2021/acc-statement-regarding-president-biden-executive-action-to-rejoin-paris-agreement>

5. <https://www.americanchemistry.com/chemistry-in-america/news-trends/blog-post/2024/acc-weighs-in-with-doe-on-industrial-decarbonization>

6. <https://www.americanchemistry.com/content/download/4333/file/ACC-Climate-Policy-Principles.pdf>

7. <https://www.americanchemistry.com/chemistry-in-america/news-trends/press-release/2024/acc-testifies-at-public-hearing-on-implementation-of-clean-hydrogen-production-tax-credit>

8. <https://www.americanchemistry.com/chemistry-in-america/news-trends/blog-post/2024/acc-weighs-in-with-doe-on-industrial-decarbonization>

American Fuel and Petrochemical Manufacturers (AFPM)

LYB role(s) and membership benefits	Board seat and various Committees. Membership with AFPM allows LYB to jointly advocate for policies, access critical industry information while benchmarking and stay informed on technical advancements, safety concerns and developments and environmental issues potentially impacting our operations.
Top Line positions on climate policy	AFPM continues to state its support for fuel efficiency standards, but the support is caveated. AFPM has not taken a position on temperature or societal targets for net zero emissions. ⁹
High level advocacy positions	AFPM has actively opposed some of the climate provisions in both the Inflation Reduction Act and the Build Back Better Act in recent years. AFPM continues to oppose policies phasing out internal combustion engines in favor of electrification of transport ¹⁰ , but publicly supports increasing the minimum octane level of gasoline to enable higher compression engines that get better fuel efficiency. ¹¹
Alignment assessment	Mixed alignment with one or more of the LYB climate policy priority areas.
Engagement intensity	High (rated as Active/Strategic Engagement by LobbyMap)
Explanation	<p>AFPM states support for “...address[ing] climate change through global cooperation and greenhouse gas emissions reductions” but does not specify support to limit global temperature rise to well below 2° C above preindustrial levels and to pursue efforts to limit the temperature increase even further to 1.5° C.¹²</p> <p>AFPM is opposed to EV mandates and bans that would impact their refining members. AFPM is leading litigation efforts to oppose federal and state laws/regulations designed to reduce GHG emissions from the transportation sector by supporting zero emissions vehicles, which play a key role in the U.S. meeting its climate targets. However, AFPM has been in active discussions with members about comprehensive transportation policy legislation, including a federal fuel carbon reduction standard and complementary well-to-wheel vehicle standard as an alternative policy. These discussions have led some members to move AFPM from misaligned on climate policy to partially aligned.¹³</p> <p>AFPM has filed regulatory comments endorsing parts of federal legislation and articulating support in its sustainability report and annual report for lower-carbon technologies such as CCS and hydrogen.^{14 15 16}</p> <p>AFPM has stated its support for sound policies and regulations, and the goal of reducing emissions, but opposes regulations that “make unreasonable and often conflicting demands on U.S. refiners and petrochemical manufacturers to make major changes in their processes.”¹⁷</p>
Additional information	AFPM’s LobbyMap profile
Follow-up actions	We will continue to engage with AFPM on climate policy issues with a goal of AFPM developing constructive and pragmatic policies that deliver actual emissions reductions in a manner that minimizes the potential for negative business or competitive impacts.

9. [Climate | American Fuel & Petrochemical Manufacturers](#)

10. [Gas Car Bans & Electric Vehicle Mandates | American Fuel & Petrochemical Manufacturers](#)

11. [95 RON Octane Standard | American Fuel & Petrochemical Manufacturers](#)

12. [Climate | American Fuel & Petrochemical Manufacturers](#)

13. <https://corporate.exxonmobil.com/-/media/global/files/policy/climate-lobbying/exxonmobil-2022-climate-lobbying-report.pdf>

14. [AFPM applauds EPA decision making way for more streamlined Louisiana carbon capture projects | American Fuel & Petrochemical Manufacturers](#)

15. [Annual Report | American Fuel & Petrochemical Manufacturers](#)

16. <https://www.regulations.gov/comment/IRS-2023-0066-29466>

17. <https://www.afpm.org/issues/environment>

Asian Clean Fuels Association (ACFA)

LYB role(s) and membership benefits	Board seat and various committees
Top Line positions on climate policy	ACFA's focus is limited to work with fuel policymakers, environmental NGOs, international standard bodies, regulators, and fuel industry stakeholders to promote and advance the use of cleaner transport fuels. The group supports the use of cleaner fuels to reduce air pollution. ¹⁸
Detailed advocacy positions	<p>ACFA is a supporter of "Clean Air Asia", an international NGO in the Asia Pacific region seeking better air quality through the reduction of air pollution and GHG emissions across the Asia Pacific region through capacity building, advocacy for effective policy and providing information to stakeholders on air pollution and climate change impacts.¹⁹</p> <p>ACFA promoted the development and adoption of advanced fuel technologies such as biofuels and fuel additives which can reduce emissions.²⁰</p>
Alignment assessment	ACFA demonstrates general alignment with emissions reduction through the use of clean fuels and fuel additives but has limited to no engagement on any other climate policy issue.
Engagement intensity	<p>Low</p> <p>No LobbyMap profile available.</p>
Explanation	ACFA's engagement on climate is confined to advancing fuels and fuels additives which reduce emissions. ACFA focuses on emissions reductions from fuels and the promotion of low carbon or carbon-neutral fuels as a key lever for achieving carbon neutrality by 2050. ACFA has no appreciable engagement in any other climate policy issue outside of this.
Additional information	No LobbyMap profile
Follow-up actions	LYB will continue to remain a member of ACFA and engage in the support for the development of cleaner fuels and additives which reduce emissions with the goal of advancing a pathway of achieving climate neutrality by 2050.

18. <https://www.acfa.org.sg/newsletters/cop28-summit-dubai-december-2023>

19. <https://cleanairasia.org/sites/default/files/2021-10/CAA%20Annual%20Report%202020.pdf>

20. <https://www.teriin.org/policy-brief/enhancing-indias-biofuels-program-examining-role-oxfuels-indias-clean-fuel-transition>

Asociacion de Combustibles Eficientes de Latinoamérica (ACELA)

LYB role(s) and membership benefits	One of five member companies.
Top Line positions on climate policy	No top line positions.
Detailed advocacy positions	ACELA is not active in climate policy issues.
Alignment assessment	Not applicable.
Engagement intensity	Low No LobbyMap profile available.
Explanation	ACELA's engagement on climate is confined to advancing fuels and fuels additives which reduce emissions. ACELA has no appreciable engagement in any climate policy issue outside of this one area. ACELA is an international partner to the Asian Clean Fuels Association, reviewed above.
Additional information	No LobbyMap profile
Follow-up actions	LYB will continue to remain a member of ACELA and engage in the support for the development of cleaner fuels and additives which reduce emissions with the goal of advancing a pathway of achieving climate neutrality by 2050, while encouraging ACELA to take a more direct and constructive approach on climate policy issues.

BusinessEurope

LYB role(s) and membership benefits	Membership on various committees, task force and working groups.
Top Line positions on climate policy	BusinessEurope continues to express top line support for limiting global warming below 2° C. This is evidenced by a press release supportive of ambitious action at COP28 issued in November of 2023 ²¹ , COP29 issued in July 2024 ²² and the webpage on the trade website related to climate change. ²³
Detailed advocacy positions	<p>BusinessEurope is strongly supportive of the deployment and integration of renewable and low-carbon energy sources, with a focus on ensuring sufficient supply of all generation sources and infrastructure to achieve climate neutrality by 2050.²⁴</p> <p>In the same position paper and study published in 2024, BusinessEurope noted the importance of the 2023 Hydrogen and Decarbonized Gas Market Package as a key toward timely and efficient development of markets for renewable gases and hydrogen and expressed the need to secure the hydrogen value chain including investment certainty for green hydrogen and low carbon hydrogen.²⁵</p> <p>In a joint letter to President Biden in January 2024, BusinessEurope expressed its concern with the pause in the U.S. Department of Energy’s review and approval of liquified natural gas export license, noting the importance of LNG in helping the EU and Japan diversify from dependence on Russia while reiterating its support of the global effort to reduce methane emissions and lowering the emissions footprint of natural gas as a fuel source.²⁶</p> <p>BusinessEurope maintains its support for a global carbon market, but with CBAM implementation in Europe currently underway, BusinessEurope notes that CBAM implementation should be monitored to ensure appropriate adjustments are made to ensure continued EU competitiveness while continuing efforts to progress the establishment of a global and consistent framework for carbon pricing and carbon mitigation practices.²⁷</p>
Alignment assessment	No misalignment with LYB climate policy positions.
Engagement intensity	High (rated as Active/Strategic Engagement by LobbyMap)
Explanation	BusinessEurope supports the European Green Deal and is committed to the transition to a climate-neutral economy by mid-century. Our evaluation has shown that their positions around hydrogen and low carbon fuels, CCUS, emerging technologies, renewable and low carbon electricity, and carbon pricing are consistent with ours.
Additional information	BusinessEurope’s LobbyMap profile
Follow-up actions	LYB will continue to remain a member of BusinessEurope, while engaging the association on climate and energy transition topics and will continue to track alignment between BusinessEurope’s climate and energy transition positions and our own.

21. <https://www.buinessurope.eu/publications/buinessurope-expectations-cop28>

22. <https://www.buinessurope.eu/publications/buinessurope-expectations-cop29>

23. <https://www.buinessurope.eu/policies/energy-and-environment/climate-change>

24. [2024-07-04-buinessurope-policy-recommendations-energy-and-climate-transition.pdf](https://www.buinessurope.eu/policies/energy-and-environment/climate-change/2024-07-04-buinessurope-policy-recommendations-energy-and-climate-transition.pdf)

25. *Supra*, at pages 2-4.

26. <https://www.buinessurope.eu/publications/liquified-natural-gas-lng-export-license-applications-and-security-energy-supply-joint>

27. [2024-07-04-buinessurope-policy-recommendations-energy-and-climate-transition.pdf](https://www.buinessurope.eu/policies/energy-and-environment/climate-change/2024-07-04-buinessurope-policy-recommendations-energy-and-climate-transition.pdf)

Chemicals Industries Association (CIA)

LYB role(s) and membership benefits	Member
Top Line positions on climate policy	The CIA expresses top line support for emissions reductions, noting that the global average temperature rise this century will need to remain well below 2 degrees Celsius and efforts will need to go further to limit the temperature increase to 1.5 degrees Celsius. The CIA notes that achieving this will require both technological and policy measures to be front loaded and delivered quickly. The CIA notes the willingness and capability of the UK chemical sector to support the commitment to net zero by 2050 but caveats this support as subject to its international competitiveness and public investment in technology and infrastructure. ²⁸
Detailed advocacy positions	<p>The CIA states that it collaborates with members, government, and regulators to insulate the industry from energy transition costs while transitioning to a net-zero energy system. The CIA supports industry plans to mitigate emissions through fuel-switching to hydrogen or electricity and retrofitting carbon capture equipment. CIA works to ensure supportive policies for these investments and to prevent net-zero transition costs from harming manufacturers.</p> <p>The CIA notes the current UK reliance on natural gas for heat and the future substitution of natural gas for low carbon hydrogen for clean electricity and/or the capture of emissions from natural gas where fuel-switching is not possible. However, the CIA states this is only possible through government support for industry to compete globally until global industrial competitors match the UK's climate ambitions.</p> <p>The CIA calls for the linking of the UK Emissions Trading Scheme (ETS) to the EU ETS to create a level-playing field and the implementation of effective carbon leakage prevention within the UK scheme.³¹</p> <p>The CIA states its support for the Climate Change Committee's assessment that we need low carbon hydrogen produced from all sources. This includes green hydrogen produced with clean electricity as well as blue hydrogen made from natural gas with carbon capture and storage. The CIA notes that robust regulation and monitoring systems are needed to ensure that the hydrogen reaching an end user is providing an environmental benefit, i.e., that its production meets the conditions of the UK's low carbon hydrogen standard.³²</p>
Alignment assessment	No misalignment with LYB climate policy positions.
Engagement intensity	Low No LobbyMap evaluation available.
Explanation	The CIA reiterates the chemical industry's commitment to the transition to a climate-neutral economy by mid-century. Our evaluation has shown that their positions around hydrogen and low carbon fuels, CCUS, emerging technologies, renewable and low carbon electricity, and carbon pricing are consistent with ours.
Additional information	No LobbyMap profile.
Follow-up actions	LYB will continue to remain a member of the CIA, while engaging the association on climate and energy transition topics and will continue to track alignment between CIA's climate and energy transition positions and our own.

28. <https://www.cia.org.uk/net-zero/accelerating-britains-net-zero-economy-the-chemical-industry/85.article> ; <https://www.cia.org.uk/our-focus/cia-manifesto-2024>

29. <https://www.cia.org.uk/about/policy-areas/energy-and-climate-change> ; <https://www.cia.org.uk/download?ac=133>

30. <https://www.cia.org.uk/energy-and-climate-change/energy-and-climate-change/58.article>

31. *Supra* and <https://www.cia.org.uk/download?ac=74>

32. <https://www.cia.org.uk/energy-and-climate-change/the-hydrogen-climate-solution/60.article> ; <https://www.cia.org.uk/download?ac=76>

China Petroleum and Chemical Industry Federation (CPCIF)

LYB role(s) and membership benefits	Member, with representation on committees, working groups and task forces.
Top Line positions on climate policy	CPCIF has demonstrated a positive position on climate policy, calling for government policy to respond to climate change. ³³
Detailed advocacy positions	CPCIF supports emissions trading to incentivize the petrochemical industries low-carbon transition. ³⁴ CPCIF appears active in the creation of national standards related to carbon neutrality. ³⁵
Alignment assessment	While the CPCIF website is difficult to navigate, there appears to be general alignment with some of the LYB climate policy positions. However, the level of activity in many climate policy areas is difficult to determine.
Engagement intensity	Low (rated as limited Engagement by LobbyMap)
Explanation	The CPCIF website is difficult to navigate, there appears to be general alignment with some of the LYB climate policy positions.
Additional information	CPCIF's LobbyMap profile
Follow-up actions	LYB will continue to remain a member of CPCIF, while engaging the association on climate and energy transition topics and will continue to track alignment between CPCIF's climate and energy transition positions and our own.

33. <http://www.cpcif.org.cn/detail/5a26662e-8c7a-4fca-89bf-97dde050a9e8>

34. <http://cpcia.org.cn/detail/ff5c30a4-b105-4edf-b826-577fd0584184>

35. <http://www.cpcif.org.cn/cpcia-zlaqhb/#/detail?id=03c8893a-e11e-4461-bd28-b637069fde65>

Electricity Consumers Resource Council (ELCON)

LYB role(s) and membership benefits	<p>Board position.</p> <p>Membership with ELCON allows LYB to benefit from its advocacy efforts, technical resources and the ability to network with others involved in corporate energy management. Additionally, ELCON represents its member companies before FERC, NERC, Congress, and other state and federal agencies.</p>
Top Line positions on climate policy	<p>ELCON has not made any top-line statements regarding emissions reductions.</p>
Detailed advocacy positions	<p>ELCON is largely focused on increasing the size of the U.S. electrical grid to meet growing demands of industry through the investment in energy infrastructure and better planning for transmission expansion. ELCON is a strong proponent of using both fossil and renewable resources and the expansion of existing pipelines and infrastructure to better-ensure U.S. energy independence.³⁶</p> <p>ELCON is a strong proponent of permitting reform to enhance the speed of development for the transmission grid and interconnection processes.^{37 38}</p> <p>ELCON notes the support for its members’ commitments towards the reduction of GHG emissions from their operations through the procurement of lower-carbon energy supplies, and investments in carbon capture and storage and hydrogen production, but has contested EPA GHG rules for fossil-fired electric generating units, noting concerns related to reliability and cost impacts due to early retirement of these units due to the rule’s proposed compliance and timeline requirements.³⁹</p> <p>In additional comments to the EPA’s GHG rule, ELCON noted that thermal generation, especially natural gas, plays an important role in meeting low carbon energy goals. Rather than speed the retirement of these resources, it believes there needs to be a balance and diversity of supply to adequately support the nation’s movement toward more cost-effective and broadly deployed low carbon energy technologies.⁴⁰</p>
Alignment assessment	<p>Mixed alignment with LYB climate policy positions related to emerging technologies and low carbon renewable energy and electrification. No appreciable positions on other LYB climate policy priorities.</p>
Engagement intensity	<p>Low</p> <p>No LobbyMap evaluation available.</p>
Explanation	<p>ELCON is inactive with regard to many of the LYB climate policy positions, focusing almost exclusively on US federal and state policies that affect the price, availability and reliability of electrical service. General alignment demonstrated with the LYB climate policy positions related to grid capacity upgrades needed to support the high electricity demands tied to the electrification of processes and with policies accelerating the development of emerging technologies which enable the reduction of emissions from carbon intensive, large scale manufacturing needs. However, ELCON remains a strong proponent of fossil fuel-derived sources of energy in the short- to mid-term. LYB recognizes that the energy transition will take place over time, and that energy sourced from fossil fuel-derived sources are necessary in the short-to mid-term while renewable fuel sources and accompanying low-carbon dispatchable capacity is developed.</p>
Additional information	<p>No LobbyMap profile.</p>
Follow-up actions	<p>LYB will continue to remain a member of ELCON, while engaging the association on climate and energy transition topics and will continue to track alignment between ELCON’s climate and energy transition positions and our own.</p>

36. <https://elcon.org/blog/senate-committee-on-energy-and-natural-resources-karen-onaran-testimony-growing-demand-for-electric-power/>

37. *Supra*

38. <https://elcon.org/blog/ad24-9-joint-consumer-letter-in-support-of-further-generator-interconnection-reforms/>

39. <https://elcon.org/blog/8-8-23-elcon-comments-epa-ghg-rule/>

40. *Supra*

European Chemical Industry Council (CEFIC)

LYB role(s) and membership benefits	<p>Board position and members in various committees and working groups.</p> <p>Key membership benefits of CEFIC include policy influence, industry and regulation updates, networking opportunities and participation in working groups addressing key issues like sustainability and safety.</p>
Top Line positions on climate policy	<p>In July 2023, CEFIC released a report emphasizing the industry’s commitment to supporting the EU Green Deal and the importance of a legislative environment that facilitates the industry’s transition to 2050 climate neutrality.⁴¹</p>
Detailed advocacy positions	<p>The July 2023 manifesto/report issued by CEFIC called for the EU Commission to ensure the scale-up of all available technologies for circular and for renewable carbon, including chemical recycling, and develop a comprehensive Circular Carbon Strategy that also incentivizes Carbon Capture and Use (CCU) and biobased feedstock.^{42 43}</p> <p>In February 2024, CEFIC coordinated the issuance of the Antwerp Declaration, calling for increased EU electricity production through the prioritization of new projects supporting affordable low carbon renewable and nuclear energy as well as the enablement of cross-border electrical power and grid expansion for hydrogen. The Antwerp Declaration also calls for a boost in consumer demand for net zero, low carbon and circular products. LYB was a signatory to this declaration.⁴⁴</p> <p>CEFIC has expressed its support for carbon pricing and carbon leakage principles and supports the implementation of CBAM with caveats related to concerns on indirect carbon costs, coverage of full value chains, the maintenance of export competitiveness and the establishment of adequate rules and procedures.⁴⁵</p> <p>CEFIC is a strong supporter of CCS as a key net-zero technology and complimentary technology to other emissions abatement options used to reduce emissions from the chemical industry.⁴⁶</p> <p>CEFIC has expressed support for Small Modular Reactors (SMR’s) as a promising technology for providing low-carbon electricity and details a number of recommendations to support the implementation of SMR’s as a low-carbon energy lever in the EU.⁴⁷</p> <p>CEFIC has expressed the need for access to competitive and abundant renewable and low-carbon energy as critical to the competitiveness of the EU’s manufacturing industry and to the transition to climate neutrality and recommends maintenance of a technology neutral market design when assessing adequacy and flexibility needs.⁴⁸</p>
Alignment assessment	<p>No misalignment with LYB climate policy positions.</p>
Engagement intensity	<p>High (rated as Active/Strategic Engagement by LobbyMap)</p>
Explanation	<p>CEFIC supports the European Green Deal and Europe’s ambition to become climate neutral by 2050. Our evaluation has shown that their positions around hydrogen and low carbon fuels, CCUS, emerging technologies, renewable and low carbon electricity, and carbon pricing are consistent with ours.</p>
Additional information	<p>CEFIC’s LobbyMap profile</p>
Follow-up actions	<p>LYB will continue to remain a member of CEFIC, while engaging the association on climate and energy transition topics and will continue to track alignment between CEFIC’s climate and energy transition positions and our own.</p>

41. <https://cefic.org/media-corner/newsroom/cefic-publishes-manifesto-teaming-up-for-a-climate-neutral-and-competitive-europe/>

42. <https://cefic.org/app/uploads/2023/08/Chemical-industrys-Manifesto-for-the-2024-2029-EU-legislative-term.pdf>

43. <https://cefic.org/app/uploads/2023/05/Cefic-position-paper-Net-Zero-Industry-Act.pdf>

44. <https://antwerp-declaration.eu/#signatories>

45. <https://cefic.org/policy-matters/climate-change-and-energy/eu-carbon-market-and-ets-link-tbc/>

46. https://cefic.org/app/uploads/2024/12/Final-Cefic-paper_Chemical-Industry-access-to-CCS.pdf

47. https://cefic.org/app/uploads/2024/05/Final-version_Policy-Recommendations-for-Nuclear-SMR-deployment.pdf

48. https://cefic.org/app/uploads/2023/05/Position-Paper_-_Cefic-position-on-the-proposal-of-the-European-Commission-amending-the-EU-Electricity-Market-Design.pdf

International Council of Chemical Associations (ICCA)

LYB role(s) and membership benefits	Executive committee position and membership on various committees, task force and working groups.
Top Line positions on climate policy	ICCA continues to express topline support for the Partis Agreement. The climate policy statement in 2021 remains the same. ⁴⁹
Detailed advocacy positions	ICCA supports the ambition to achieve a climate neutral world by mid-century. The chemicals and materials manufacturers ICCA represents are committed to being part of the solution to global climate change in two ways: 1) working to reduce GHG emissions associated with our own operations, and 2) enabling the entire manufacturing value chain to reduce their own GHG footprints through the use of the energy-saving and emissions reducing technologies and materials produced or made possible by chemical innovations. Our evaluation has shown that their positions around hydrogen and low carbon fuels, CCUS, emerging technologies, renewable and low carbon electricity, and carbon pricing are consistent with ours.
Alignment assessment	No misalignment with LYB climate policy positions.
Engagement intensity	Low No LobbyMap evaluation available.
Explanation	In the climate neutrality statement published in 2021, the ICCA stated its support for the ambition of the chemical industry to achieve climate neutrality by mid-century. To align with this statement, ICCA commissioned a study to identify pathways and key enablers for the global chemical industry to reach climate neutrality, which was published in 2024. ⁵⁰ The Climate Neutrality report recognizes the industry need for low emission hydrogen combined with CCS and accompanying supportive policy frameworks and permit processes as an important pathway to limiting emissions from manufacturing processes. The report also notes the importance of low-emission energy from various sources as a key enabler to climate neutrality. ⁵¹
Additional information	No LobbyMap profile.
Follow-up actions	LYB will continue to remain a member of ICCA, while engaging the association on climate and energy transition topics and will continue to track alignment between ICCA's climate and energy transition positions and our own.

49. <https://icca-chem.org/news/icca-statement-on-climate-policy/>

50. <https://icca-chem.org/wp-content/uploads/2024/11/Climate-Neutrality.pdf>

51. See pages 8-9; 35-39 of report.

National Association of Manufacturers (NAM)

LYB role(s) and membership benefits	Membership on various committees, task force and working groups. Membership with NAM provides LYB with opportunities for input to critical policy areas affecting our industry and access to advocacy and legal support and operational excellence tools based on industry best practices.
Top Line positions on climate policy	NAM's top level energy and environment policy statements remain unchanged from the prior report and express support for emission reduction. ^{52 53 54}
Detailed advocacy positions	<p>NAM has mixed advocacy in the climate space. While NAM has supported the energy transition with a focus on permitting reform, it has focused in many cases on increased investment in fossil fuels vs. energy sourced via more sustainable means. For example, in a January 2025 news release, NAM criticized the Biden administration on the decision to ban new offshore oil and gas drilling in American coastal waters.⁵⁵</p> <p>NAM has been a consistent supporter of hydrogen as an energy source and reiterated this support in a January 3, 2025 news release, but while noting hydrogen is key to the production of natural gas and nuclear power. NAM has consistently advocated for permit reform as a means to increase the use of renewables, carbon capture, hydrogen and nuclear energy sources, and has been supportive of the 45V tax credit with suggested changes to enhance flexibility.^{57 58 59 60}</p> <p>In a December 2024 letter to the incoming Trump administration, the group advocated for a repeal of the Biden administration's LNG export ban, accelerated permitting for energy projects, and replacement of the EPA's power plant rules, stating that the mandate for coal and natural gas supplied powerplants to adopt carbon capture and hydrogen co-firing technologies in the next 10 years was unrealistic. In the same letter, NAM opposed a complete rollback of the Inflation Reduction Act's tax credits and advocated for "long term regulatory certainty" in the EPA's standards for light-, medium-, and heavy-duty vehicles, while noting that regulatory stability is key to continued investment by automobile manufacturers in lower emission vehicles.⁶¹</p> <p>NAM strongly opposed the SEC's climate reporting rules asking that the rules be revised to eliminate disclosure of Scope 3 emissions and delay annual GHG reporting to allow for more time to collect data among other suggestions.⁶²</p> <p>Like AFPM, NAM has stated opposition to electric vehicle mandates, lack of harmonized standards and has expressed concerns with limited timeframes for implementation.⁶³ NAM has also lobbied against the Department of Transportation's National Highway Traffic Safety Administration issuance of a proposal calling for a revision of current Corporate Average Fuel Economy standards for cars and light-duty trucks.⁶⁴</p> <p>NAM's position on Carbon Capture remains unchanged from the prior evaluation.^{65 66}</p>
Alignment assessment	Mixed alignment with one or more of LYB climate policy priority areas.
Engagement intensity	High (rated as Active/Strategic Engagement by LobbyMap)
Explanation	Our evaluation has shown that NAM's positions around hydrogen and low carbon fuels, CCUS, emerging technologies, and renewable and low carbon electricity are largely consistent with ours. However, while NAM has supported the energy transition with a focus on permitting reform, it has focused in many cases on increased investment in fossil fuels vs. energy sourced via more sustainable means.
Additional information	NAM's LobbyMap profile
Follow-up actions	LYB will continue to remain a member of NAM, while engaging the association on climate and energy transition topics, and will continue to track alignment between NAM's climate and energy transition positions and our own.

52. <https://nam.org/wp-content/uploads/2020/04/Energy-and-Environment-Policies.pdf>

53. <https://www.nam.org/wp-content/uploads/2021/01/The-Promise-Ahead.pdf>

54. https://documents.nam.org/COMM/Competing_to_Win_2022.pdf

55. https://nam.org/biden-drilling-ban-sets-u-s-back-32951/?stream=policy-legal&utm_source=link&utm_medium=social

56. https://nam.org/hydrogen-announcement-sets-the-stage-for-american-energy-leadership-32932/?stream=policy-legal&utm_source=link&utm_medium=social

57. https://nam.org/epas-power-plant-rule-is-unachievable-without-substantial-permitting-reform-30842/?stream=policy-legal&utm_source=link&utm_medium=social

58. https://nam.org/doe-nam-urge-flexible-45v-rules-30345/?stream=policy-legal&utm_source=link&utm_medium=social

59. https://nam.org/manufacturers-new-hydrogen-tax-credit-regulations-fail-to-incentivize-growth-and-investment-29774/?stream=policy-legal&utm_source=link&utm_medium=social

60. https://nam.org/nam-pushes-for-sensible-clean-hydrogen-regulations-29690/?stream=policy-legal&utm_source=link&utm_medium=social

61. https://nam.org/wp-content/uploads/2024/12/Manufacturers-Regulatory-Letter-to-President-Elect-Trump_12.5.24.pdf

62. https://nam.org/why-the-secs-climate-rule-wont-work-29382/?stream=policy-legal&utm_source=link&utm_medium=social

63. https://nam.org/nam-fights-auto-regulation-mess-29356/?stream=policy-legal&utm_source=link&utm_medium=social

64. https://nam.org/nam-pushes-back-on-new-emissions-standards-27944/?stream=policy-legal&utm_source=link&utm_medium=social

65. <https://www.nam.org/wp-content/uploads/2021/01/The-Promise-Ahead.pdf>

66. <https://www.nam.org/wp-content/uploads/2020/02/NAM-Policy-Positions-2020.pdf>

Plastics Europe

LYB role(s) and membership benefits	Board position and members in various committees and working groups.
Top Line positions on climate policy	Plastics Europe has limited engagement on EU climate regulation but has expressed broad support for climate ambitions and has supported an enabling policy framework to reach carbon neutrality by 2050. ⁶⁷
Detailed advocacy positions	As in the first report, Plastics Europe continues to express top line support for the development of energy needs from renewable low-carbon energy, such as renewable electricity and green hydrogen. ⁶⁸ Plastics Europe's support for increasing the use of renewable resources, including renewable energy and electricity and the development of carbon capture technologies remains unchanged since the issuance of their statement on EU Climate Neutrality in November 2020. ⁶⁹
Alignment assessment	No misalignment with LYB climate policy positions, but with limited engagement.
Engagement intensity	Low (rated as limited Engagement by LobbyMap)
Explanation	Plastics Europe states support emissions reduction efforts, stating "we therefore support the EU's ambition to become climate-neutral by 2050..." Our evaluation has shown that their high-level positions around hydrogen and low carbon fuels, CCUS, emerging technologies, renewable and low carbon electricity, and carbon pricing are consistent with ours, but that engagement on climate issues is generally limited.
Additional information	Plastics Europe LobbyMap profile
Follow-up actions	LYB will continue to remain a member of PlasticsEurope, while engaging the association on climate and energy transition topics and will continue to track alignment between PlasticEurope's climate and energy transition positions and our own while encouraging Plastics Europe to be more active in the climate space.

67. <https://plasticseurope.org/sustainability/climate/> ; <https://plasticseurope.org/sustainability/climate/circular-feedstocks/sustainable-production/>

68. <https://plasticseurope.org/sustainability/climate/renewable-energy/>

69. https://plasticseurope.org/wp-content/uploads/2021/10/View_paper_EU_climate_neutrality_final.pdf

Plastics Industry Association

LYB role(s) and membership benefits	<p>Member with participation on various committees.</p>
Top Line positions on climate policy	<p>The Plastics Industry Association (Plastics) issued a general statement on Climate Change in 2008 which has not been updated and is not currently posted on its website.</p>
Detailed advocacy positions	<p>No evidence of specific climate-related lobbying for Plastics was found.</p>
Alignment assessment	<p>Given Plastic’s lack of specific climate positions, there is no alignment assessment for this trade.</p>
Engagement intensity	<p>Low No LobbyMap evaluation available.</p>
Explanation	<p>Plastics is active in many issues related to plastics circularity, product regulatory and environmental issues related to plastics production. Plastics supports Operation Clean Sweep, an international program designed to prevent resin loss into the marine environment.</p>
Additional information	<p>No LobbyMap profile</p>
Follow-up actions	<p>LYB reached out to Plastics in 2024 seeking to have the trade issue an updated climate policy statement. A revised draft statement has been developed with member input and is proceeding forward with approval. LYB will continue to work with Plastics to take a more formal position on climate change in the coming years.</p>

United States Council for International Business (USCIB)

LYB role(s) and membership benefits	Board position and membership on various policy committees and working groups.
Top Line positions on climate policy	USCIB has been a long-term supporter of the UN Framework Convention on Climate Change (since 1993). USCIB has been present at every COP. ^{70 71} USCIB has encouraged the US to stay actively involved in the UN climate treaty and to encourage companies in all sectors to integrate climate mitigation into their activities, supply and value chains. ⁷²
Detailed advocacy positions	During COP28, USCIB recognized COP outcome text including language on transitioning away from fossil fuels, but noting the importance of the decision text referencing the role of transitional fuels and technological solutions such as carbon capture and storage. ⁷³ USCIB supports the launch of the Blue Dot Network, a project certification framework that aims to strengthen infrastructure investment by certifying projects on robust standards in economic, environmental, social and other areas. ⁷⁴ In 2025, USCIB has stated its intent to focus on ongoing developments in corporate climate and biodiversity reporting requirements, the Global Biodiversity Framework, and the lead-up to UN Climate COP30, advocating for US business inclusion in climate action. ⁷⁵
Alignment assessment	No misalignment with LYB climate policy positions.
Engagement intensity	High No LobbyMap evaluation available.
Explanation	USCIB's priorities include advancing global climate action alongside energy security, innovation and climate resilience. USCIB principles recognize carbon pricing as an important climate policy tool, and USCIB seeks opportunities to design international climate cooperation that works with markets to encourage companies in all sectors to integrate climate mitigation into their activities, supply and value chains. Our evaluation has shown that their high-level positions align with our climate policy principles.
Additional information	No LobbyMap profile
Follow-up actions	LYB will continue to remain a member of USCIB, while engaging the association on climate and energy transition topics, and will continue to track alignment between USCIB's climate and energy transition positions and our own.

70. <https://uscib.org/uscib-foundation-hosts-summit-of-the-future-roundtable-to-tackle-climate-change-across-the-global-pact-for-the-future/>

71. <https://uscib.org/uscib-content/uploads/2023/11/final-USCIB-COP28-Letter-to-the-Administration.pdf>

72. <https://uscib.org/climate-change-and-energy/>

73. <https://uscib.org/uscib-represents-u-s-business-at-un-meetings-on-climate-cop28/>

74. <https://uscib.org/tag/energy/>

75. <https://uscib.org/uscib-content/uploads/2025/01/uscib-annualrpt-digital-010925.pdf>

About us

We are LyondellBasell (LYB) – a leader in the global chemical industry creating solutions for everyday sustainable living. Through advanced technology and focused investments, we are enabling a circular and low carbon economy. Across all we do, we aim to unlock value for our customers, investors and society. As one of the world's largest producers of polymers and a leader in polyolefin technologies, we develop, manufacture and market high-quality and innovative products for applications ranging from sustainable transportation and food safety to clean water and quality healthcare. For more information, please visit www.lyb.com or follow [@LyondellBasell](https://www.linkedin.com/company/lyondellbasell) on LinkedIn.