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01. Introduction

Climate action is one of Repsol's top five sustainability focus areas. We are committed to mitigating greenhouse gas emissions within our own operations and our value chain. Tackling climate change at the required speed and scale demands robust government policies and regulatory framework that create the right conditions for business to act and enable the transformation of the energy system.

We are decarbonizing traditional operations of oil and gas, generating renewable electricity, and producing renewable fuels to provide affordable and sustainable solutions for mobility, industry, and households. We strongly support close collaboration between companies, industry associations, and governments to develop policy frameworks that accelerate an orderly energy transition, which ensure decarbonization, affordability and energy security.

Repsol actively participates in the consultative processes for developing national and international policies, legislation, and regulations, providing information, recommendations, and opinions grounded in our technical expertise. We advocate for regulatory simplification to enhance competitiveness and legal certainty, stimulate innovation, and reduce operational barriers by streamlining reporting requirements and administrative processes.

Repsol advocates for policies that support limiting global warming in line with the Paris Agreement. This advocacy is conducted both directly and through participation in industry groups and trade associations. Individually and in collaboration with other stakeholders, Repsol is committed to ensuring that all advocacy and lobby activities align with the objectives of the Paris Agreement and to promoting a policy and regulatory framework that balances climate ambition with industrial competitiveness. Our public climate positions guide our engagement with governments, trade associations, and other relevant groups.

Repsol's commitment to climate action is reflected in our ambition to be aligned with limiting global warming to 1.5° C and achieve net zero emissions by 2050. In line with this objective, Repsol submitted its updated energy transition plan for an advisory shareholder vote at its Annual General Meeting in 2024.

This *Climate Policy Engagement Review* outlines our climate policy priorities and reviews the positions and activities of our main trade associations to ensure they are consistent with Repsol's priorities. This analysis identifies good practices and areas for improvement, guiding our actions to address any misalignments, and boosting constructive engagement.

We are committed to ensuring that our own initiatives and those of trade associations in which we participate align with the Paris Agreement and our climate policy positions. We call on governments to work collaboratively with industry and other stakeholders to create a level playing field that fosters innovation, investment, and sustainable growth. Together, we can build a more sustainable future, one that ensures access to secure, affordable and decarbonized energy for generations to come. The preparation of this report is an exercise in transparency, aimed at communicating our assessment of the initiatives and trade associations in which we participate.



Last but not least, this report also responds to growing investor expectations for clearer, more consistent disclosure of corporate climate advocacy. In this context, the report reflects best practices set by the <u>Global Standard on Responsible Climate Lobbying</u>, the leading investor-backed framework for evaluating how companies govern, disclose, and manage their climate policy advocacy. These criteria are now embedded in the <u>Climate Action 100+ Net Zero Company Benchmark</u>.

Clara Rey: Director of Sustainability

Ángel Bautista: Director of Institutional Relations and Regulatory Coordination

02. Repsol's Climate Policy Engagement

Repsol reaffirms its commitment to climate change mitigation and has set a target to become a net zero emissions company by 2050. This ambition is aligned with the Paris Agreement, which aims to limit global warming well below 2°C, while pursuing efforts to limit it to 1.5°C.

We aim to reach net zero emissions across all scopes (1, 2 and 3) by 2050. To support this, we have set interim targets to reduce the Company's carbon intensity in the short, medium and long term, and absolute emissions across our value chain. By 2030, we target a 55% reduction in operated scopes 1 and 2 emissions and a 20% reduction in total emissions including scope 3 category 11. These targets align with a 1.5°C pathway, as explained in our Consolidated Management Report based on IPCC Sixth Assessment Report scenarios.

Repsol's decarbonization targets							
		Base year		2025	2030	2040	2050
Carbon Intensity Indicator (CII)	gCO ₂ e/MJ	2016	76.8	-15%	-28%	-55%	Net Zero Emissions
Absolute emissions Scope 1+2+3	Mt CO ₂ e	2018	224		-20%		Net Zero Emissions
Operated Emissions Scope 1+2	Mt CO ₂ e	2016	25.4		-55%		Net Zero Emissions
Methane emissions intensity	%; m³/m³	2017	1.34	0.2	Near zer)	
Routine flaring	Kt CO₂e	2018	344	-50%	zero		

By the end of 2024, we had already achieved a 45% reduction in operational scope 1 and 2 emissions from 2016 levels and a 13.8% reduction in scope 1, 2, and 3 emissions from 2018 levels. Our Carbon Intensity Indicator was also reduced by 13.4% compared to 2016, moving us closer to our intermediate target of 15% by 2025.

Repsol's advocacy aligns with the goals of the Paris Agreement and is guided by the company's 2024–2027 Strategic Update. It focuses on contributing to the development of policies and regulations that enable an affordable, secure, and sustainable energy system. Our priorities are outlined in our Climate Policy Positions, which set out where we aim to contribute most effectively to global climate objectives.

Repsol Climate Policy Positions

Paris Agreement Commitment: Repsol is committed to the Paris Agreement's goal of keeping global warming well below 2°C and pursuing efforts to limit it to 1.5°C, by driving a transformation of the energy system through technology and innovation.

Net Zero by 2050: Repsol targets net zero emissions by 2050, including scope 3 emissions, by accelerating the development and deployment of low-carbon technologies such as renewable electrification, renewable fuels, carbon capture and storage (CCUS), and energy efficiency to transform the energy landscape. *Governments must turn net zero targets into clear, actionable policies-set credible roadmaps, and predictable investment frameworks, prioritizing competitiveness.*

Technology Neutrality: We encourage policymakers to adopt a technology-neutral approach that enables all low-carbon solutions to compete and complement each other, fostering innovation and balancing climate ambition with industrial competitiveness.

Carbon Pricing: Repsol advocates for effective, global carbon pricing mechanisms to drive cost-effective decarbonization and scale investments, while applying an internal carbon price to guide new investments within the company. *International cooperation on carbon markets is key to accelerate investment in emissions reductions and removals.*

Just Transition: We promote an inclusive and fair energy transition that guarantees affordable and secure energy access, while protecting vulnerable communities and workers throughout the process.

Repsol maintains open and constructive direct dialogue with policymakers and regulators. Through indirect advocacy, the company also contributes to shaping policy discussions within trade associations, working to build broad-based support for the decarbonization of the global energy landscape. Repsol believes that achieving the **objectives of the Paris Agreement requires an orderly, science-based, and inclusive energy transition, grounded in technological realism and economic viability.** We support climate ambition that goes hand-in-hand with competitiveness, affordability, and energy security-three pillars without which the global decarbonization effort will not be sustainable.

Repsol advocates for a regulatory framework that encourages innovation and investment, ensures legal certainty, and avoids unnecessary administrative burdens. We support performance-based climate policies that enable all technologies that reduce emissions without imposing unnecessary rigid mandates or bans.

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Repsol promotes the principle of **technological neutrality** as the most effective way to accelerate emissions reductions. This approach is particularly relevant in the transport sector, where renewable fuels can play a crucial role in all transport segments (road, aviation and maritime). Internal combustion engines powered by renewable fuels offer an affordable, viable, scalable solution to decarbonize the existing road transport, complementing electrification.

Repsol also supports a life-cycle emissions approach, allowing the full carbon footprint of energy vectors to be assessed transparently and fairly. This includes the use of certification schemes and robust monitoring, reporting and verification (MRV) frameworks that ensure environmental integrity without creating excessive administrative burdens. At the same time, we advocate for innovation-enabling rules that support the scale-up of emerging technologies such as CO_2 -based fuels, bio-based feedstocks, and renewable hydrogen and its derivatives.

In our engagement with institutions and stakeholders across the regions where we operate, we consistently call for policies that strengthen industrial competitiveness while accelerating the deployment of low-carbon energy solutions. This includes supporting a clear and coherent set of rules that avoids unnecessary overlaps and ensures consistency across sectors and value chains.

More detailed information on Repsol's responses to public consultations is available on our website: Participation in associations and public consultations

Repsol's global climate policy advocacy is internally coordinated by the **Regulatory Coordination Committee.** This Committee brings together representatives from the Business Units, and key Corporate Divisions. This team works in close collaboration with local offices across the countries where Repsol operates to ensure consistent and aligned positions, specifically EU and USA. They guide international, national and local advocacy through continuous engagement with institutions and a wide range of stakeholders active in climate discussions.

This advocacy is carried out with full transparency and accountability. In the European Union, Repsol is registered in the <u>European Transparency Register</u>, which promotes openness in the participation of private actors in the EU policymaking process. Through this platform, the public can access information on Repsol's meetings with the European Commission and the European Parliament, its contributions to public consultations, and its involvement in industry associations. In the United States, Repsol discloses its federal lobbying activities quarterly, <u>United States Lobbying Disclosure</u>

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03. Indirect Climate Policy Engagement

Repsol participates in a broad network of industry associations at the national and international levels. These platforms are essential for engaging with regulators, policymakers, and stakeholders on a wide range of public policy issues, including climate and energy transition. Through these associations, Repsol contributes to the development of technical frameworks, environmental standards, and best practices in these areas.

Our level of involvement varies: there are associations we are general members, while in others we hold leadership positions on governing boards, technical committees, or specialized working groups. We also provide expert resources to support key initiatives when appropriate.

In 2025, Repsol conducted an internal review of its trade associations to gain a better understanding of the positions and activities of our industry associations. We commit to publishing annually a transparent list of main associations and advocacy groups, disclosing our view on their alignment with the Paris Agreement and our climate priorities.

Addressing misalignment:

Repsol conducts regular assessments of the climate policy positions of the industry associations in which it participates, to identify potential misalignments with the company's climate strategy and its commitment to the goals of the Paris Agreement. Where such misalignments are identified, our first step is to engage directly with the association to understand the root of the divergence and advocate for changes that bring their public positions closer to Repsol's. This process includes clarifying the nature of the misalignment, proposing specific changes, and monitoring progress over time.

In certain cases, we may determine that Repsol's interests are best served by remaining a member despite a disagreement. In such situations, we reserve the right to make a public statement explaining our position and the reasons for our continued engagement. We will then continue working with the association to seek alignment with Repsol's climate policy goals.

For other cases where fundamental disagreements remain with no effective improvement despite our continued efforts, we are prepared to end our participation.

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04. Industry Association Review

Selection process:

This review covers 31 trade associations of which Repsol is a member, across various geographies and segments of the energy value chain. We have selected the most relevant initiatives and associations, based on the following three criteria:

- Strategic importance for Repsol: we prioritize associations operating in regions where Repsol
 has material business activities and where climate policy engagement is particularly relevant
 to our external stakeholders and to the delivery of our energy transition strategy
- Level of influence held by Repsol: we assess whether Repsol holds a governance or decision-making role within the association (e.g. board or working group positions) and the significance of our membership fee.
- Relevance in shaping public policies related to climate change and energy transition: we
 consider the association's potential influence on regulatory developments, including its
 engagement at regional, national, or local levels.

These criteria were incorporated into a structured vetting process, in which each association was scored from 1 (the highest) to 3 on each criterion, for a maximum possible total of 9 points. Associations with a total score of 6 or lower were selected for inclusion, based on their overall relevance for Repsol's climate advocacy efforts.

In particular, the selected associations stand out for their significant involvement in indirect advocacy activities and for their active participation in public consultations, through which Repsol channels a significant share of its policy advocacy.

This year we have ended our membership in several associations, including the Asociación Colombiana del Petróleo, WindEurope, Asociación de Generadoras de Chile and SPIRE (Sustainable Process Industry Through Resource and Energy Efficiency), for reasons other than our assessment of their climate alignment.

Assessment methodology:

In this review, we have evaluated the climate positioning of each association against Repsol's own climate policy positions. The assessment focused on identifying the degree of alignment between the associations' public advocacy and Repsol's commitment to become a net zero emissions company by 2050. We have analyzed publicly available materials, including official websites, consultation responses, and public communications on climate-related policies. When relevant, we also engage directly with the associations to clarify positions and encourage greater transparency.

This analysis was carried out in June 2025 and resulted in an overall alignment rating for each association, based on Repsol's five stated climate policy positions.

Positions	What we assess
Paris Agreement	Whether the association publicly supports the goals of the Paris Agreement.
Net Zero by 2050	Support for achieving net zero GHG emissions by 2050, including advocacy for enabling policies and key low-carbon technologies (e.g. energy efficiency, renewable hydrogen, biofuels, CCUS, natural climate solutions).
Technology Neutrality	Whether it promotes a technology-neutral approach that values all solutions based on their emissions reduction potential.
Carbon Pricing	Support for effective carbon pricing mechanisms as a tool for cost-efficient emissions reduction.
Just Transition	Whether it recognizes and promotes policies to manage the social impacts of a fair energy transition.

The final association qualification from our assessment can be:

- Aligned: The association supports the Paris Agreement and/or the achievement of net zero by 2050 and demonstrates consistency with Repsol's strategic pillars on climate action.¹
- Partially aligned: The association has not publicly backed the goals of the Paris Agreement and/or net zero emissions by 2050 or some of Repsol's priority levers for decarbonization.
- **Misaligned:** The association promotes or defends policy positions that are clearly incompatible with Repsol's climate strategy.

We recognize that interpreting alignment is not always straightforward. There is no universal policy roadmap for achieving the Paris Agreement, and it is expected that perspectives will differ across sectors and jurisdictions. Our benchmark is based on whether an association's policy engagement constructively supports climate ambition or, conversely, hinders progress without offering credible alternatives.

In this context, Repsol seeks a decarbonization pathway that is environmentally effective, as well as economically and socially viable. That means advancing climate policies that are aligned with the three vertices of the energy trilemma: **security of supply, affordability for consumers, and environmental sustainability.**

Although some associations may publicly support the Paris Agreement and net zero goals, their opposition to specific mitigation policies-without viable substitutes-may still lead to a misalignment rating. The review focused on concrete policy actions, not only on high-level declarations or voluntary commitments.

^{1.} In cases where an association did not express a position, and we consider the matter to be irrelevant to its scope, we did not qualify it as a misalignment.

Results

For the 31 industry associations reviewed, our assessment has led to the following results:

- 30 aligned associations, of which 2 have been revised for the first time (Global Carbon Institute and Zero Emissions Platform EU (ZEP EU).
- 1 partially aligned association (API).
- · No misaligned associations.

Repsol payments (USD)	Industry Associations	Member of board or executive committee	Engagement score*	Alignment**
500,000 - < 1.5 M	Oil & Gas Climate Initiative (OGCI)	Y	1	А
	Fuels Europe (FE)	Υ	1	А
	American Petroleum Institute (API)	Υ	2	PA
	AICE (former AOP)	Y	2	А
100,000 - < 500,000	Association of Plastics Manufacturers in Europe (Plastics Europe)	Υ	2	А
	European Chemical Industry Council (CEFIC)	Υ	1	А
	International Association Oil and Gas Producers (IOGP)	N	3	А
	Federación Empresarial de la Industria Química Española (FEIQUE)	Υ	2	А
	International Petroleum Industry Environmental Conservation Association (IPIECA)	Υ	2	А
50,000 - < 100,000	Eurogas	Υ	2	А
	SEDIGAS	Υ	2	Α
	Global Carbon Capture Institute	N	3	A
	E-fuels Alliance	Υ	2	Α
	Asociación Empresarial Eólica (AEE)	Y	2	А
	National Petroleum Council (NPC)	Y	1	А

3,000 - < 50,000	Confederación Española de Organizaciones Empresariales (CEOE)	Υ	1	А
	Círculo de Empresarios	Υ	1	А
	Business Europe (BE)	Υ	2	А
	Solar Energy Industries Association (SEIA)	N	3	А
	Zero Emissions Platform EU (ZEP EU)	N	3	А
	International Emissions Trading Association (IETA)	N	3	А
	Red Española del Pacto Mundial	N	3	А
	Hydrogen Europe	N	3	А
	American Clean Power (ACP)	N	3	А
	International Air Transport Association (IATA)	Z	3	А
	Asociación Ibérica de Gas Natural (GASNAM)	N	3	А
	Asociación Española de Hidrógeno (AEH2)	Υ	2	А
	International Gas Union (IGU)	N	3	А
	Plataforma Tecnológica Española del CO2 (PTECO2)	Υ	2	А
	Cámara de Comercio Internacional - Comité Español	Υ	2	А
	Unión Española Fotovoltaica (UNEF)	N	3	А

^{*} Engagement score: reflects Repsol's level of influence within the association-one of the three selection criteria-where 1 indicates board-level participation with the involvement of senior management (e.g., CEO or executive committee members); 2, board membership with mid-level management involvement; and 3, participation limited to working groups.

^{**} A = Aligned; PA = Partially aligned



As part of this review, we are publishing a detailed alignment analysis of six industry associations selected for their strategic relevance to Repsol, influence on public policy, and active engagement in climate-related advocacy. These associations were chosen based on the strength of our working relationship, their role in our indirect advocacy and public consultations, and their identification in third-party assessments.

In future editions, we will expand the scope of this detailed analysis to include additional associations.

Detailed alignment analysis:

	Assessment Criteria					
Industry Association Geography	Paris Agreement	NZE by 2050	Technology Neutrality	Carbon Pricing	Just Transition	
American petroleum institute (API)						
	Top Line Positions API shows solid alignment with Repsol's climate positions in several technical areas, notably on technology neutrality, support for carbon pricing, and genera endorsement of the goals of the Paris Agreement. While API has not explicitly endorsed the objective of achieving net zero emissions by 2050, it remains engaged in key policy debates and supports various low-carbon solutions. This position reflects a partial alignment with one of the core pillars of Repsol's climate ambition.					

Assessment Criteria

Industry Association Geography	Paris Agreement	NZE by 2050	Technology Neutrality	Carbon Pricing	Just Transition
Association of Plastics Europe					
Manufacturers in Europe (Plastics Europe)	committed to ac Agreement. It po feedstocks (recy hydrogen, and C as ETS and CBAI	is a European a chieving climate comotes a techr cled, biobased CCUS. The assoc M and actively o	ssociation represent eneutrality by 2050 nology-neutral appro, CO ₂ -based), chemiciation supports carb contributes to EU pol decarbonization.	ing plastics ma in line with the bach that includ cal and mechan on pricing insti	Paris des circular ical recycling, ruments such

		Assessment Criteria					
Industry Association	Geography	Paris Agreement	NZE by 2050	Technology Neutrality	Carbon Pricing	Just Transition	
Business Europe (BE)	Europe						
			To	p Line Positions	5		
		The association strongly supports the Paris Agreement and the EU's 2050 net zero target, advocating for a technology-neutral, cost-effective, and socially inclusive climate transition. It promotes stable regulatory frameworks that accelerate the deployment of low-carbon technologies such as renewable hydrogen, CCS, low-carbon fuels, and nature-based solutions, while ensuring that carbon pricing mechanisms like the EU ETS remain central to the EU's decarbonization strategy.					
			Assessme	ent Criteria			
Industry Association	Geography	Paris Agreement	NZE by 2050	Technology Neutrality	Carbon Pricing	Just Transition	
<u>Eurogas</u>	Europe						
		Top Line Positions Eurogas is a key European gas industry association that supports climate action aligned with the Paris Agreement. It endorses the EU's 2050 climate neutrality target and promotes the role of renewable and low-carbon gases in a cost-effective, technology-neutral transition. Eurogas actively supports carbon pricing and engages constructively in EU climate and energy policymaking.					
		Assessment Criteria					
Industry Association	Geography	Paris Agreement	NZE by 2050	Technology Neutrality	Carbon Pricing	Just Transition	
Fuels Europe (FE)	Europe						
			To	p Line Positions	- -		

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policy priorities.

Fuels Europe supports the Paris Agreement and the EU's 2050 climate neutrality target, advocating for policy frameworks that enable the deployment of low-carbon liquid fuels. Its *Clean Fuels for All* pathway outlines the scale-up of advanced biofuels, e-fuels, and CCUS to decarbonize transport. The association promotes technology-neutral climate regulation, supports the EU ETS and CBAM, and calls for a just transition that safeguards industrial competitiveness and social inclusion. Its positions are strongly aligned with Repsol's climate

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Industry	Paris	NZE by	Technology	Carbon	Just
Association Geography	Agreement	2050	Neutrality	Pricing	Transition
International Association Oil and Gas Producers (IOGP)	aligned with the by 2050 and pro and low-carbon market-based so	g oil and gas ind Paris Agreeme motes key deca fuels. IOGP adv blutions such as	dustry associations of the Earbonization technol vocates a technology is carbon pricing. While as not publicly addresses a technology and the Earbon pricing.	ommitted to clin U's goal of clim ogies like CCUS r-neutral appro ile aligned with	ate neutrality 5, hydrogen, ach and Repsol's

- Aligned: The association's position is aligned with Repsol's climate policy and there is clear, publicly available evidence supporting this stance.
- Partially aligned: The association shows partial or inconsistent support for Repsol's position. Public evidence is available, but some elements are ambiguous or not fully aligned.
- Not aligned: The association's position is misaligned. This may be due to public evidence of
 opposition to key elements of Repsol's climate strategy or lack of support where alignment
 would be expected.
- Not assessed: The criterion falls outside the association's typical scope of work or there is insufficient information to allow for a meaningful evaluation

05. Appendix **1:**

Detailed Industry Association Review

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American petroleum institute (API)

The American Petroleum Institute (API) is the leading U.S. trade association for the oil and natural gas industry, representing over 600 members across the entire energy value chain. Founded in 1919, API plays a key role in shaping energy policy, setting technical standards, and advocating on behalf of the industry at the federal, state, and international levels.			
Board of director			
Paris Agreement: API publicly supports the ambitions of the Paris Agreement, explicitly referencing global efforts to reduce GHG emissions and alleviate poverty. In multiple statements, API underscores the role of U.S. oil and gas companies in driving emissions reductions through technological innovation. While API does not refer directly to the 1.5°C target, its endorsement of the Agreement's overarching goals and framing of the industry as part of the solution reflects a constructive stance. ^{1,2,3}			
Net Zero: API does not explicitly endorse the objective of reaching net zero emissions by 2050. While it supports a range of critical low-carbon technologies it has not articulated a long-term emissions reduction target.			
Technology Neutrality: API strongly supports a technology-neutral approach to climate policy. It has advocated for permitting reform to accelerate deployment of both fossil and renewable energy infrastructure 4.5, and it recognizes the complementary role of natural gas and renewables 5. API opposes policies that prescribe specific fuels or technologies, such as ICE bans or ZEV mandates, arguing instead for innovation and market-driven emissions reductions. 28.9.10.11. API places significant emphasis on the deployment of CCUS and low-carbon hydrogen. It actively supported the expansion of the 45Q and 45V tax credits 12 and continues to engage with key regulatory bodies to ensure the implementation of effective incentive structures for these technologies 11.13. Through public events, policy recommendations, and industry collaboration, API reinforces the idea that CCUS and hydrogen are not optional add-ons but central pillars of a realistic and affordable energy transition. 14 Carbon Pricing: API is one of the few major U.S. trade associations with a formal, consensus-based carbon pricing proposal. Its support for an economy-wide carbon price-based on internal modelling and public advocacy-reflects a clear commitment to market-based climate solutions. API has consistently defended carbon pricing as a cost-effective, transparent way to reduce emissions and has promoted it in regulatory consultations and public discourse 15.16			
Just Transition: API has not yet published a standalone position on just transition. However, it is actively engaged in the development of just transition principles through its work with IPIECA and IOGP. The upcoming update of the IPIECA-API IOGP Sustainability Reporting Guidance, in which Repsol is also directly involved, is expected to incorporate just transition considerations. ¹⁷			
Partially alignment in one Repsol policy priority area			
Moderate engagement			
Repsol values its membership in API, particularly its role in representing the industry on a wide range of regulatory and policy matters in the United States. API's technical advocacy on issues such as permitting reform, carbon pricing, and the development of key decarbonization technologies is aligned with Repsol's priorities and supports progress toward a lower-emissions energy system. We welcome API's continued emphasis on technology-neutral policies and its engagement in regulatory discussions relevant to industrial decarbonization and market-based climate solutions. Repsol will continue to engage constructively with API, including through our participation in relevant governance bodies and working groups. We will encourage API to strengthen its public position on achieving net zero emissions by 2050, in line with the goals of the Paris Agreement. We will remain a member of API at this time and continue to monitor alignment closely. Where differences remain, we will be transparent and engage proactively to support further progress.			



Association of Plastics Manufacturers in Europe (Plastics Europe)

Description	Plastics Europe is the pan-European association representing plastics manufacturers. It advocates for the sustainable use of plastics and supports industry transformation through circularity, innovation, and climate neutrality.					
Repsol role	Member of Steering Board, Advisory and several Support Groups					
	Paris Agreement: : Plastics Europe publicly supports the Paris Agreement and the objectives of the EU Green Deal, stating that "we fully support the European Green Deal and the EU's ambition to be climate neutral by 2050," explicitly referencing the Paris goals. 18					
	Net Zero by 2050: Plastics Europe has committed to achieving climate neutrality by 2050 and has published a roadmap outlining the key technological and policy levers required for this transition. Their strategy integrates several low-carbon technologies, such as sustainable carbon as feedstock (recycled, biobased and CO ₂), hydrogen as energy carrier, CCUS ¹⁹					
	Technology Neutrality: Plastics Europe supports all technologies able to contribute to being circular and have net zero emissions by 2050. Plastics Europe consistently advocates for a technology-neutral approach to climate and circular economy policies. The association emphasizes that regulations should enable a broad range of solutions-including mechanical and chemical recycling, alternative feedstocks, carbon capture technologies, and efficiency improvements-without prescribing one "correct" technological path ^{20,21}					
Detailed advocacy positions	Carbon Pricing: Plastics Europe supports market-based mechanisms such as emissions trading systems (ETS) and carbon taxes, highlighting their role in achieving cost-effective emissions reductions while minimizing carbon leakage. Overall, Plastics Europe views CBAM as a crucial tool in the EU's climate strategy, aiming to reduce greenhouse gas emissions while ensuring fair competition and promoting sustainable practices. ²² Just Transition: Plastics Europe works closely with policymakers, industry stakeholders, and the value chain to promote dialogue and collaboration. This helps to create policies and practices that support a just transition for all involved. These efforts are part of a broader vision to create a sustainable plastics system that meets societal demands while supporting economic growth and social equity. ²³					
Alignment assessment	Aligned					
Engagement intensity	Moderate engagement					
Explanation	Repsol values its membership in Plastics Europe, particularly its commitment to advancing circularity, innovation, and climate neutrality across the plastics value chain. We welcome the association's clear support for the Paris Agreement, its technology-neutral approach to decarbonization, and its endorsement of key levers such as CCUS, hydrogen, and sustainable feedstocks. We consider Plastics Europe a constructive partner in the transition to a low-carbon and circular economy. Repsol remains an active member and will continue to engage proactively to support alignment with our climate policy positions and the EU's climate objectives					

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Business Europe

Description	Business Europe is the leading business association representing national industry and employer federations across Europe. It advocates for policies that promote European competitiveness, sustainable growth, and social cohesion, including in the context of climate and energy policy.
Repsol role	Advisory and Support Group
Detailed advocacy positions	Paris Agreement: Business Europe explicitly supports the objectives of the Paris Agreement, particularly the goal of limiting global warming to well below 2°C and sees the agreement as essential to guiding climate action. It urges governments to provide clear direction and long-term frameworks aligned with Paris goals.²4 Net Zero by 2050: Business Europe supports the EU's objective of achieving climate neutrality by 2050, and calls for stable, cost-effective and predictable regulatory frameworks to accelerate deployment of key technologies. These include: Renewable energy: Supports accelerated deployment through streamlined permitting and grid integration. 25 Low-carbon fuels: Endorses sustainable biofuels and synthetic fuels for hard-to-abate sectors, within a technology-neutral framework. CCUS: Promotes CCUS as essential for decarbonizing industrial processes and achieving negative emissions, calling for investment de-risking frameworks. Hydrogen: Views renewable and low-carbon hydrogen as strategic; supports scale-up through EU-wide infrastructure and cost reduction strategies. 26 Technology Neutrality: Business Europe consistently calls for a technology-neutral policy approach, allowing all emissions-reduction solutions (including renewables, hydrogen, CCUS, and low-carbon fuels) to compete based on effectiveness and efficiency. 27.28.29 Carbon Pricing: The association supports the EU ETS as the cornerstone of EU climate policy and emphasizes the importance of a predictable, stable carbon price to ensure cost-effective decarbonization. It also backs the CBAM to address carbon leakage risks. 30 Just Transition: Business Europe acknowledges the social and economic impacts of climate policies and advocates for inclusive measures that ensure a just transition,
Alignment assessment	supporting affected workers, communities, and industries to maintain social cohesion. 31 Aligned
Engagement intensity	Moderate engagement
Explanation	Repsol values its membership in Business Europe, particularly its role in shaping EU-wide regulatory and policy frameworks that support industrial competitiveness and the transition to a low-carbon economy. We welcome Business Europe's advocacy for technology-neutral climate policies, the strengthening of carbon pricing mechanisms such as the EU ETS, and its recognition of the need for a just and inclusive energy transition. We remain a committed member of Business Europe and view the association as a constructive partner in advancing an effective, balanced climate and energy policy in Europe. We will continue to monitor alignment and engage proactively to support ambitious and pragmatic climate action.

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Eurogas

Description	Eurogas is a European association representing over 100 companies across 28+ countries in the gas value chain, including natural gas, biomethane, hydrogen, and methane management. Founded in 1990, it leads the sector's transition to climate neutrality by advocating for an efficient, decarbonized gas market that supports energy security, EU competitiveness, and a just transition. Eurogas engages members through committees to influence EU policy and stakeholder dialogue.
Repsol role	Member of the Governing board and General Assembly; Strategy, Wholesale market and retail market Committee; Advocacy Group and other related technical working groups.
Detailed advocacy positions	Paris Agreement: : Eurogas publicly supports the objectives of the Paris Agreement, including limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C. The association explicitly commits to the EU's climate neutrality goal by 2050 and supports the European Commission's long-term vision of a carbon-neutral economy. Eurogas emphasizes the role of gaseous fuels in achieving these targets and advocates for policy frameworks consistent with these goals. 32.33.34
	Net Zero by 2050: Eurogas recognizes and actively supports the goal of achieving net zero greenhouse gas emissions by 2050, with a sector ambition to become carbon neutral even earlier (potentially by 2045), dependent on enabling EU legislation. The association highlights the critical role of natural gas, renewable and low-carbon gases, including biomethane and hydrogen, as essential to Europe's energy transition. It strongly supports key technologies such as CCUS, renewable hydrogen, advanced biofuels, and synthetic fuels 35.36.37. Eurogas does not explicitly reference Natural Climate Solutions as part of its net zero pathway.
	Technology Neutrality: Eurogas promotes a technology-neutral approach to climate policy that enables a diverse range of solutions needed to reach carbon neutrality. It calls for open and pragmatic frameworks that do not favor any single technology but rather emphasize emissions reductions and system integration. The association supports scaling renewable and low-carbon gases and CCUS, while urging policy coherence with existing EU legislation to avoid market distortions. 38,39,40
	Carbon Pricing: Eurogas actively supports strengthening carbon pricing mechanisms, including expanding emissions trading systems (ETS) and carbon taxes, as fundamental tools for cost-effective emissions reductions aligned with the Paris Agreement. The association regards the EU ETS as the cornerstone of climate policy in Europe and calls for reforms to improve its effectiveness and long-term stability. 41.42
	Just Transition: Eurogas strongly embraces the concept of a just transition, recognizing the social and economic impacts of climate policy on workers, communities, and industries. The association actively engages in EU initiatives such as the Pact for Skills and the European Sectoral Social Dialogue for Gas. 43.44 It supports inclusive policies focused on retraining, reskilling, and securing quality employment. Eurogas is also negotiating an European Framework Agreement on Just Transition specifically for the gas sector. 45.46
Alignment assessment	Aligned
Engagement intensity	Moderate engagement
Explanation	Repsol values its membership in Eurogas, particularly its commitment to the EU's 2050 climate neutrality goal and its advocacy for a diversified energy mix where renewable and low-carbon gases, including biomethane and hydrogen, play a central role. We welcome Eurogas's proactive contributions to EU energy and climate policy, including its support for enabling regulatory frameworks, guarantees of origin for renewable gases, and the development of hydrogen-ready infrastructure. We also appreciate its strong stance on carbon pricing, technology neutrality, and a just transition for workers in the gas sector. We remain a committed member of Eurogas and value its role as a constructive and forward-looking voice in Europe's energy transition.

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Fuels Europe

Description	Fuels Europe represents the conventional and renewable fuels industry in Europe. They engage in policy debates with EU institutions and other stakeholders, providing expert opinions on the production, distribution, and use of fuels. Their goal is to contribute to a regulatory framework that promotes technological excellence, supports sustainable development, and protects human health and the environment
Repsol role	President, member of Board, Advisory and Support Groups
Detailed advocacy positions	Paris Agreement:: Fuels Europe supports the goals of the Paris Agreement and the EU's objective of climate neutrality by 2050. They emphasize the need for significant policy improvements to unlock investments and technologies needed to meet the 2050 target and are ready to cooperate with the EU on relevant regulations. Fuels Europe advocates for a technology-neutral approach and a level playing field to ensure all solutions contributing to the EU's climate goals are considered ⁴⁷ Net Zero by 2050: Fuels Europe is actively involved in the EU's goal of achieving net zero greenhouse gas emissions by 2050. The organization recognizes the importance of this target and is committed to contributing to the transition, particularly through the development and deployment of renewable and low-carbon liquid fuels. ⁴⁷
	Technology Neutrality: Fuels Europe believes that a full spectrum of low carbon technologies will be essential throughout the energy transition and beyond 2050, to ensure security of supply, provide consumer choice, and also build Europe's industrial leadership. Electrification and hydrogen will play major roles. Liquids will still be necessary for some uses, and the concept of a liquid fuel can be fully separated from petroleum. The transformation and the role of low-carbon liquid fuels as one of the critical low-carbon technology sets is outlined in their ambitious <u>Clean Fuels for All pathway</u> . This pathway aims to bring increasing volumes onto the market to meet climate neutrality for all liquid fuels requirements by 2050. 48
Detailed advocacy positions	Carbon Pricing: Fuels Europe supports market-based mechanisms such as emissions trading systems (ETS) and carbon taxes, highlighting their role in achieving cost-effective emissions reductions while minimizing carbon leakage. Fuels Europe supports the EU ETS as a cost-effective market mechanism for emissions reduction in the power and industry sector, and it has always supported global ETS to include as much as possible societal emissions. 49 Just Transition: Fuels Europe has highlighted the need for a just transition for society and EU citizens in their advocacy and policy documents. They emphasize that the transition to climate neutrality by 2050 should be inclusive and fair, ensuring that no one is left behind. This includes addressing the social and economic impacts on workers and communities and supporting measures that ensure a fair level playing field for all. 47
Alignment assessment	Aligned
Engagement intensity	High engagement
Explanation	Repsol highly values its engagement with Fuels Europe. This partnership enables the development and promotion of renewable fuels and fosters collective initiatives aimed at decarbonizing the energy sector, shaping a sustainable future, underscoring their dedication to supporting innovative solutions in line with global climate goals. By actively collaborating with this industry association, Repsol advances shared strategies and regulatory advocacy to accelerate the energy transition.

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International Association Oil and Gas Producers (IOGP)

Description	The International Association of Oil & Gas Producers (IOGP) is the global voice of the upstream oil and gas industry, representing companies and associations engaged in exploration and production. Through technical expertise and policy engagement, IOGP contributes to the development of safe, efficient, and environmentally responsible practices, and plays an active role in shaping energy transition and climate policies, particularly in Europe.
Repsol role	General member
Detailed advocacy positions	Paris Agreement: IOGP explicitly supports the goals of the Paris Agreement and regularly engages in the UNFCCC process as an observer. It promotes emissions reductions aligned with the Paris temperature goals \$\frac{90}{20}\$ Net Zero by 2050: IOGP supports the EU's climate neutrality target by 2050 and advocates for enabling policy and financial frameworks to scale key decarbonization technologies. It strongly promotes CCS through a dedicated committee, technical publications, and proposals such as an European CCS Bank. IOGP actively collaborates with the European Commission on CO2 storage obligations under the Net Zero Industry Act and has published a broader Energy Transition Framework to guide upstream operators. 51.52.53.54.55.56.57 The association also works on methane mitigation, co-developing MMRV guidelines with OGCI and IPIECA, and supports robust data frameworks for GHG emissions \$\frac{58}{20}\$. While its focus remains on technological solutions, IOGP has also contributed to EU consultations on natural carbon removals and carbon certification, indicating an openness to nature-based approaches. \$\frac{59}{20}.60.61\$ Technology Neutrality: IOGP promotes a technology-neutral approach across energy policy, advocating for the development of CCUS, low-carbon and renewable hydrogen, renewable fuels, and energy efficiency. It calls for life-cycle-based assessments and equal support for all low-carbon options \$\frac{62}{20}.64.65.66.67\$ Carbon Pricing: IOGP supports market-based mechanisms such as emissions trading systems (ETS) and carbon taxes, highlighting their role in achieving cost-effective emissions reductions while minimizing carbon leakage \$\frac{68.69}{20}.70\$ Just Transition: No public evidence was found indicating that IOGP has explicitly addressed just transition principles. This topic remains unassessed until further information is available.
Alignment assessment	Aligned
Engagement intensity	Low engagement
Explanation	Repsol values its membership in IOGP, particularly its role in advancing technical knowledge and policy dialogue on industrial decarbonization, including carbon capture and storage, low-carbon hydrogen, and emissions monitoring. We welcome IOGP's leadership in shaping enabling frameworks for CCS and hydrogen deployment, as well as its support for carbon pricing and lifecycle-based approaches to low-carbon fuels. We also note IOGP's constructive engagement with EU institutions on the implementation of the Net-Zero Industry Act and the development of robust MMRV standards. We remain a committed member of IOGP and value its role as a technically credible and solution-oriented association in the evolving climate and energy policy landscape.

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