

# HUMAN RIGHTS POLICY

APPROVED BY

PRYSMIAN S.p.A BOARD OF DIRECTORS

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## Table of Contents

<i>LEADERSHIP MESSAGE</i> .....	2
1. <i>PURPOSE &amp; OBJECTIVE</i> .....	3
2. <i>PROGRAM OWNERS</i> .....	4
3. <i>APPLICABILITY</i> .....	4
4. <i>YOUR RESPONSIBILITY AS EMPLOYEE</i> .....	4
5. <i>POLICY REQUIREMENTS – PRINCIPLES AND GENERAL RULES OF CONDUCT</i> .....	4
5.1 <i>NON-DISCRIMINATION</i> .....	5
5.2 <i>CHILD LABOUR</i> .....	5
5.3 <i>FORCED, BONDED AND COMPULSORY LABOUR</i> .....	5
5.4 <i>FREEDOM OF ASSOCIATION AND RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING</i> .....	6
5.5 <i>HEALTH AND SAFETY</i> .....	6
5.6 <i>WORKING CONDITIONS</i> .....	6
5.7 <i>FAIR WAGES AND EQUAL COMPENSATION</i> .....	7
5.8 <i>COMMITMENT TOWARDS LOCAL COMMUNITIES</i> .....	7
5.9 <i>PRIVACY PROTECTION</i> .....	8
6. <i>IMPLEMENTATION AND REPORTING</i> .....	8
7. <i>RESPONSIBILITY WITHIN PRYSMIAN</i> .....	9
8. <i>CONSEQUENCES OF POLICY VIOLATION</i> .....	10
9. <i>REPORTING A POLICY VIOLATION</i> .....	10
10. <i>AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT</i> .....	10
11. <i>RELATED DOCUMENTS</i> .....	11

## LEADERSHIP MESSAGE

Companies have the responsibility to respect the international human rights standards, consider people's rights and address any adverse human rights impacts that they may cause or contribute to. This universal responsibility for business enterprises is defined by the "Protect, Respect and Remedy" framework, welcomed by the United Nations Human Rights Council in 2008. Inspired by the principles and concepts expressed in the Ruggie Framework, Prysmian's commitment to the respect of human rights consists in adopting this Human Rights Policy, implementing a structured process to support internationally recognized human rights standards and avoiding any complicity in human rights violations.

The Policy embraces and complies with several international conventions such as the International Bill of Human Rights, including the Universal of Human Rights, and the Fundamental ILO Conventions detailed in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. It defines Prysmian's commitment to protect fundamental human rights, including the dignity of the individuals working in its operations, and to promote the respect of all human rights within its value chain and business relationships.

Within Prysmian's sustainability commitment, ethical principles are extremely important. Prysmian believes that an ethical business conduct is a driver for the success of its business. Prysmian enforces its journey towards the respect of human rights and the responsible business practices adopted with the publication and the implementation of its [Code of Ethics](#). Principles expressed in Prysmian's Code of Ethics are to the highest standards of ethical behavior and follow applicable laws and regulations. Moreover, aiming at developing a sustainable value chain, Prysmian has adopted a [Code of Business Conduct](#), which is a document embracing Prysmian's responsible business practices by ensuring that ethical, economic, environmental and social standards are respected along Prysmian's value chain. Third parties cannot derive or enforce any rights from this declaration.

**Massimo Battaini**

Prysmian CEO

## 1. PURPOSE & OBJECTIVE

The principles mentioned in this Policy apply to Prysmian's physical and legal boundaries in terms of business activities and operations carried out by the workers of Prysmian S.p.A. and its subsidiaries.

The purpose of this Policy is to commit Prysmian to supporting the adoption of the principles reported below along its value chain<sup>1</sup> and within the communities in which it is present. In addition, Prysmian encourages all suppliers it works with to adopt the Policy, aiming at building a responsible and sustainable value chain.

Prysmian is committed to progressively assessing its suppliers' respect of the principles reported in this Policy, through a structured process supported by audits with the aim of monitoring the supply base to prevent any violation and, if necessary, firmly take actions in order to identify any denial of human rights.

This Policy is based and inspired upon the standards set by the International Community and the applicable laws and regulations, including – but not limited to:

- a) The International Bill of Human Rights;
- b) The Universal Declaration of Human Rights;
- c) The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and its conventions;
- d) The United Nations "Protect, Respect and Remedy" Framework, developed by the United Nations Human Rights Council;
- e) OCSE Children's rights and Business principles;
- f) SA8000 Guidelines;
- g) OECD Guidelines for Multinational Enterprises;
- h) The United Nations Global Compact;
- i) UK Modern Slavery Act;

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<sup>1</sup> The definition of value chain includes among the others joint ventures, sales agents, local communities, customers, suppliers and more in general business partners.

## 2. PROGRAM OWNERS

Sustainability Department, together with Risk Management, Procurement and Human Resources Departments own this Program and are responsible for periodically reviewing and updating it to ensure it accurately reflects organizational updates or legal and regulatory changes.

## 3. APPLICABILITY

This Policy applies to all employees, interns, external consultants, officers, directors and administrators of all legal entities of Prysmian. This Policy also applies for those workers which are independent contractors working in Prysmian venues and plants.

## 4. YOUR RESPONSIBILITY AS EMPLOYEE

This Policy requires you to:

- a) Read, understand, and comply with the requirements included in this Policy;
- b) Comply with Prysmian's [Code of Ethics](#) and any other applicable policies or procedures;
- c) Report immediately to the appropriate channels outlined in Section 6 of the [Helpline Policy](#) any alleged violation of this Policy, both if committed by a Prysmian employee or an external stakeholder;
- d) Ask questions or report any concerns related to this Policy;
- e) Complete assigned training related to this Policy when required.

## 5. POLICY REQUIREMENTS – PRINCIPLES AND GENERAL RULES OF CONDUCT

Prysmian's commitment relies on principles concerning the fundamental human rights contained in the ILO's Declaration on Fundamental Principles and Rights at Work.

## 5.1 NON-DISCRIMINATION

Prysmian respects diversity and avoids any form of unfair or unlawful discrimination in employment or occupation, promoting a culture where people recognize the value that a diverse and inclusive workforce brings. Prysmian is committed to embracing all the differences in employees' age, gender, marital status, race or ethnicity, nationality, religion or other beliefs, sexual orientation, social and educational background, family and care responsibilities, disability and any other form of diversity. Consistent with the ILO Convention No. 111, Prysmian aims at creating a safe working environment, free from any direct or indirect and associative or individual discrimination, any sort of violence or harassment, either sexual or based on personal, political and cultural diversity. In case any discrimination occurs, it will not be tolerated and actions will be taken as foreseen in [Prysmian Global Anti-Harassment Policy](#).

The aim of Prysmian is to make sure that all the employees are treated with dignity, respect and fairness, and that they exhibit a conduct that reflects the values of Prysmian.

## 5.2 CHILD LABOUR

Prysmian commits to the effective elimination of child labour in its supply chain and adheres to the principles established in the ILO Convention No. 138 and 182 in which hazardous work, considered as any work which is likely to negatively impact children's physical, mental or moral health, safety or morals, is prohibited to children under the age of 18. The minimum working age should respect the age of compulsory schooling and should be no less than 15 years of age. Prysmian commits to providing decent work for young workers and ensuring protection and safety of children in all business activities and facilities, while reinforcing community and government efforts to protect and fulfil children's rights.

## 5.3 FORCED, BONDED AND COMPULSORY LABOUR

Prysmian ensures voluntary employment for all its employees and eliminates any form of forced, bonded and compulsory labour, following the ILO Convention No. 29 and 105. Banned forced labour also includes human trafficking, threatening workers with severe deprivations,

such as withholding passports or other ID documents, food or land or wages, physical violence or sexual abuse, or bonding workers through debts.

#### ***5.4 FREEDOM OF ASSOCIATION AND RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING***

Prysmian commits to an open and constructive dialogue with its employees and their representatives. Adopting the ILO Convention No. 87, 98 and 154, employees can engage in collective bargaining according to the applicable national laws, as a way for determining the contractual working conditions and regulating the implementation of collective agreements.

#### ***5.5 HEALTH AND SAFETY***

As underlined in its [Health, Safety, Environment and Energy Policy](#), Prysmian's duty is to ascertain that the working conditions of its employees respects health and safety standards, ensuring a safe working environment for all workers and employees. As outlined in ILO Conventions No. 148, 155 and 176, the absence of disease and physical and mental elements affecting health, which are directly related to safety and hygiene at work, must be guaranteed. In addition, it must be guaranteed also the absence of noise, air pollution and vibration. Moreover, Prysmian commits to preventing any fatalities, injuries or ill health affecting workers or members of the public or damaging the environment due to its operations.

#### ***5.6 WORKING CONDITIONS***

Contracts must have written agreements on employment, containing agreed terms and conditions, including notice periods on both sides. By following the ILO Convention No. 122, Prysmian guarantees the fullest possible opportunity for each worker to qualify for, and to use his/her skills and endowments in a job for which he/she is well suited. Employees are guaranteed the respect of working hours set on national laws and industry standards, are

granted with secure employment, access to all the necessary facilities to create a pleasant working environment and holidays according to national legislation. Prysmian acknowledges the importance of ensuring a healthy work-life balance for all employees and is committed to respecting rest and meal breaks and to preventing excessive overtime and working hours. Training is provided to all employees and Prysmian is committed to equality of access to development and education opportunities to support individual career growth while contributing to the company's long term sustainable development. Employees working conditions are also safeguarded through [Prysmian's Conflict Minerals Policy](#).

#### **5.7 FAIR WAGES AND EQUAL COMPENSATION**

Prysmian, following the ILO Conventions No. 100 and 131, ensures a fair and equal remuneration to its employees and complies with national regulations on salary and any additional emoluments. Employees are guaranteed with respect of minimum wage set by the relevant national law, if present, and are provided with all benefits which are legally required or agreed upon in their contract. In case of overtime hours, employees are compensated according to the national established salary or, in those countries where such regulation does not exist, the compensation will be at least equal to their regular hourly pay. Prysmian is committed to gender equality and equal remuneration for male and female employees; male and female equal value of work is also ensured.

#### **5.8 COMMITMENT TOWARDS LOCAL COMMUNITIES**

Prysmian's responsibility towards local communities refers both to Prysmian employees and to people living in proximity to Prysmian plants and working site. Prysmian recognizes the rights of indigenous people as they are detailed in the ILO Convention No. 169, including the right of local communities to exercise control over their own institutions, ways of life and economic development and to maintain and develop their identities, languages and religions within the framework of the States in which they live.



Prysmian respects the local communities' identities, their right to live in good conditions and the quality of their local environment. In planning or implementing environmental and resource-use strategies, Prysmian ensures that its business operations do not contribute to any human rights violation, any damage to the environment or any reduction of access to natural resources. Furthermore, Prysmian contributes to the economic development of the community ensuring a fair, equal and respectful treatment and exerting a positive influence on the local area. Prysmian supports the dialogue with community's representatives and is committed to promoting engagement activities with local stakeholders, contributing to existing programs or planning and implementing social investment programs in cooperation with governments and civil society actors.

## **5.9 PRIVACY PROTECTION**

Prysmian is committed to respecting and protecting the privacy of all its employees. The Company ensures that personal data is collected, processed, and stored in compliance with applicable data protection laws and regulations. Prysmian adopts appropriate technical measures to safeguard employees' information and guarantees that privacy rights are upheld as an integral part of its commitment to human rights.

## **6. IMPLEMENTATION AND REPORTING**

Prysmian values its relationship with the stakeholders, their engagement and the continuous communication. For this reason, Prysmian commits to reporting the most relevant information and results of the monitoring process of human rights issues in the Integrated Annual Report. In order to ensure the implementation of the Policy through all business operations:

- a) training is provided to Prysmian's management and supervisors and any appropriate information is given to all employees, with the aim of raising awareness of the topic, presenting and explaining the principles supported by Prysmian and the tools and policies in place;

- b) the monitoring of the adequate application of the principles outlined in this Policy, together with the principles expressed in the [Code of Ethics](#) and the [Code of Business Conduct](#), will be included in human rights assessment processes.

To ensure a transparent disclosure, the Policy and the Human Rights Due Diligence procedure are available to all external stakeholders on the Corporate website in the [Human Rights](#) section, and have been shared internally via the Company's Intranet.

## 7. RESPONSIBILITY WITHIN PRYSMIAN

In light of the evolving and dynamic nature of both the external and internal context, periodic review and updating of this Policy are carried out by the Sustainability Department in conjunction with the Risk Management, Procurement and Human Resources Departments. Specifically, these functions, each within their respective areas of responsibility:

- define the methodology for assessing the risk of potential impacts on Human Rights that Prysmian may cause or contribute to causing. This broad assessment is carried out annually and every time that new, significant risks of adverse impacts materialize and it is performed taking into account possible developments in national and international Human Rights norms and other applicable standards;
- monitor over time the evolution of the relevant regulatory framework and best practices (e.g., papers, interpretative guides prepared by organizations and/or specialized bodies, peers), and take into account issues that may emerge from the materiality analysis required for the Prysmian Integrated Annual Report;
- consider organizational and business developments (e.g., entry into new sectors/countries) that may alter risk exposure. The update of the topics is carried out constantly and in the event of significant internal changes that require a revision;
- determine which vendors are considered in scope for the Human Rights program and aligned with the principles of the [Code of Ethics](#) and the [Code of Business Conduct](#).

In addition to what is defined in the Code of Ethics, in order to integrate respect for human rights into operational activities, each company within the Group, considering its specific

context and business, may express its commitment through specific policies and procedures and ensure effective compliance with regulations within its activities, guaranteeing standards of ethical and responsible conduct.

## 8. CONSEQUENCES OF POLICY VIOLATION

As a Prysmian employee, you are agreeing to uphold our commitment to ethical conduct and integrity and to abide by our [Code of Ethics](#). Prysmian employees who violate this commitment or do not comply with this Policy shall be subject to disciplinary procedures, including possible dismissal, and any other legal action required to protect the interest and reputation of Prysmian, in line with the local applicable legislation.

As expressed in Prysmian's [Code of Business Conduct](#), if any violation of the principles occurs, Prysmian reserves the possibility to reconsider the future of the commercial partnership with the involved business partners.

## 9. REPORTING A POLICY VIOLATION

As a Prysmian employee, you are required to report any Policy violation to:

- a) [the Integrity First Helpline](#); or
- b) your Regional Compliance Team or the other designated subjects mentioned in Section 6.1 of the [Helpline Policy](#).

Any form of retaliation, including threats and attempts of retaliation, is strictly prohibited. Prysmian is committed to ensuring that all employees are free to disclose any violation, either real or suspected, of the Prysmian's [Code of Ethics](#) or any other Company policy or procedure, to the extent they have reasonable grounds to believe that the matters reported are true. You will not be adversely impacted or retaliated upon in the workplace, either personally or professionally, for raising a valid and legitimate concern.

## 10. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT

Due to the continuous changes in the external context, all the issues connected to the human rights protection need to be subjected to a periodic review. This Policy can thus be modified whenever considered necessary, in order to ensure its adequacy and effective implementation.

The program will be reviewed un updated periodically based on internal organizational updates, changes to external legislation and best practices.

Using a risk-based approach, on a periodical basis the Group Compliance Function and the Internal Audit Department may perform, respectively, monitoring or audit activities aimed at verifying the correct enforcement of this Policy within the organization.

## 11. RELATED DOCUMENTS

The following Documents are related to this Policy and must be consulted by all Prysmian employees for further guidance. Part of such documents are available in the Ethics & Integrity Section of our [Company's Intranet](#) and are also publicly available within the correspondent Section of our [Corporate website](#).

- a) Code of Ethics;
- b) Code of Business Conduct;
- c) HSEE policy;
- d) Anti-Harassment Policy;
- e) Helpline Policy;
- f) Conflict Minerals Policy.