

Code of Ethics



CEO Foreword

The respect of ethical standards while conducting business is a crucial value for Prysmian (hereinafter, also “Company”) and a responsibility promoted and endorsed by whomever is part of it. Each Prysmian employee shall protect the most valuable resource we have: our reputation.

The Code of Ethics (hereinafter, also “Code”), which reflects the rights and duties that determine our ethical and social responsibility, represents the Prysmian “Constitution” and plays an essential role in the achievement of Connect to Lead, our 5-year strategic plan.

The Code is a practical guide to follow during day-to-day activities and represents an essential tool to prevent irresponsible or illegal behavior. Principles expressed in our Mission, our Vision and our Values are built on this document.

Each employee and, broadly speaking, whomever works in name and/or on behalf of Prysmian shall know and respect the Code of Ethics, with the aim of ensuring the reliability and reputation of our Company. In order to ensure broader visibility, the Code is published on the [Company website](#).

I invite you to read this document with the utmost attention, trusting that the expressed principles will inspire your approach to the Company’s daily activities.



MASSIMO BATTAINI
Prysmian CEO

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1. Introduction



1.1. About Us

Integrity, transparency and ethics are crucial for our reputation and corporate success.

We conduct our business complying with the applicable legislation and the highest ethical standards. We guarantee respect and protection of worldwide recognized human rights and we steadily refuse any form of discrimination and illegal activity.

Our Code adheres and abides by the principles of the United Nation “Universal Declarations of Human Rights”, “Convention on the Right of the Child” and “Guiding principles on Business and Human Rights”, the Organization for the Co-operation and Economic Development “Guidelines for Multinational Enterprises”, and the International Labor Organization “Conventions”.

Moreover, we base all of our activities on the best Environment, Social and Governance (“ESG”) standards. In our daily activities we endeavor to contribute to reaching Sustainable Development Goals (“SDGs”) aimed at being an enabler for the economy decarbonization and energy transition through renewable sources.

OUR MISSION

We provide our customers with superior cable solutions based on state-of-the-art technology and consistent excellence in execution, ultimately delivering sustainable growth and profit.

A strong reputation for performance and innovation helps us deliver sustainable growth and profit.

But we don't just want to be good for business. We want to be good to do business with. That's why our values are so important to us. The things we do and the way we approach them are an opportunity for us to show our pride in our work.

OUR VISION

Energy and information help communities develop. That's why it is so important that they always be available, and that they are supplied: Effectively. Efficiently. Sustainably.

Whoever the client. Wherever they are. However harsh the environment they operate in. We are committed to keeping them connected. Every day, we all have the chance to bring our vision to life in our actions. No matter how big, or how small, the things we do daily build up over time and help us deliver on our mission.

1.2. Our Values

DRIVE

We aim to lead the industry evolution, combining our ability to develop our people and our business in a clear direction while anticipating our customers' needs.

TRUST

We want to create an environment of trust that exploits diversity and collaboration, where people are empowered to make decisions with integrity.

SIMPLICITY

We bet to simplify anything we can, focusing on high value generating activities and timely decisions to boost our Company results.

United Nations Sustainable Development Goals to which Prysmian commits



1.3. Applicability

Compliance with our Code of Ethics is fundamental to create value for our stakeholders.

Whoever works in name and/or on behalf of Prysmian must comply with this Code (e.g. members of supervisory boards, directors, officers, executives, employees, interns and consultants), as well as third parties working and doing business with us, including suppliers, clients, sales agents, contractors (hereinafter, “Third Parties”) (jointly, “Involved Parties”).

KEY DUTIES

All the Involved Parties must:

- respect all applicable laws and regulations and observe all recognized ethical principles, acting with integrity and transparency;
- respect the environment aiming at pursuing a sustainable development of their business;
- Ensure integrity and fair competition while achieving their own objectives;
- avoid any corruptive action aimed at obtaining undue advantages, both regarding relations with Public Administrations and public subjects, as well as with private subjects.

2. Health and Safety



2. Health and Safety

Health, safety and integrity of our people, both in terms of physical and psychological perspective, are our first priority.

WHAT WE DO

We strive to ensure the **utmost protection for every individual we get in touch with** during the execution of our activities. **Our goal is to spread a Health and Safety culture and educate all of the Company's stakeholders** to do the same within their respective business processes, particularly regarding the prevention of accidents.

We promote a **mental-health friendly work environment**, promoting initiatives that facilitate our people's mental and physical wellbeing.

We comply with the relevant safety laws, regulations, international standards and best practices, and we adopt specific organizational, management and control models, in the field of hygiene and safety at work (among others, for instance, ISO:45001 guidelines). To this end we:

- I. conduct our activities in technical, organizational and economic conditions as to **ensure appropriate injury prevention and a healthy working environment**, periodically updating our employed practices and technologies;
- II. inform our employees, contractors and every individual operating within our organization regarding the **preventive and protective measures to be adopted while working**.

WHAT WE EXPECT

We require all the Involved Parties to:



- attend the required health and safety trainings and awareness-raising initiatives, diversified according to the specific role, tasks, levels of responsibility and working environment;



- conduct all operations in compliance with the most up-to-date procedures and best practices in the health and safety area, being aware that, in case of breach, prompt actions might be taken;



- guarantee safety in every single moment, from the workplace to the community, endorsing our Zero & Beyond philosophy, our approach founded on the belief that human life and health are essential and take priority over everything else;



- disseminate a health and safety culture, with particular reference to the prevention of accidents, generating positive impacts.

3. Environment



3. Environment

Our environmental strategy is based on the responsible usage of resources and the safeguarding of future generations’ needs.

WHAT WE DO

We **preserve** the environmental integrity and its **biodiversity** in every phase of our business.

We stand on the frontline in the **fight against climate change** and, in accordance to the Paris Agreement, we contribute to the drastic lowering of greenhouse gas emissions, promoting the energy transition and the decarbonization of our production efforts.

We strive to **lower the environmental and naturalistic impacts**, standing against deforestation policies and creating values for local communities.

We **measure both direct and indirect emissions** of our activities and we are committed to optimizing waste disposal, properly managing the usage of chemical products that are harmful to the environment and people’s health, as well as supporting and implementing circular economy strategies.

Along the supply chain, **we are committed to the responsible use of water** and we monitor and oppose any water and/or solid waste produced by our activities.




We do not support any policy or pursue any action that may create damage to the citizens or the environment.

Each year we publish an **Integrated Annual Report**, through which we communicate our ESG performance and our progress in the environmental, social, innovation and governance fields. For further details about our Health, Safety and Environment Management System, [click here](#).

Our Integrated Annual Report highlights Prysmian’s role as an enabler of the energy and digitalization transition process and emphasizes how much sustainability is integrated within our business strategy.

WHAT WE EXPECT

Every Involved Party – particularly our suppliers – plays a key role in allowing us to achieve our environmental commitments and must:

-  **adhere to our principles regarding responsible usage of resources and environmental safeguarding;**
-  **not pursue any initiative that may harm environment and people;**
-  **comply with applicable laws and regulations, as well as enforceable international standards, including the ISO:14001 Guidelines.**



4. People



4.1. Human Rights

We are committed in the respect, safeguarding and promotion of the human rights of all people directly or indirectly involved in our operations.

WHAT WE DO

As established in our [D&I Manifesto](#), we **secure the dignity of each individual** and adopt an inclusive approach, supporting the uniqueness of each person and believe that diversity represents a source of enrichment and innovation.

We develop and maintain a working environment where **there is no room for any form of discrimination or harassment** – both physical and verbal – by race, sex, skin color, nationality or social origin, ethnicity, language, religion, age, disability, sexual orientation, gender identity or expression, adherence to association or labor unions, political opinion or any other state protected by applicable laws.

As mentioned in our [Human Rights Policy](#), we evaluate the impact on human rights, and we monitor our performance involving several parties within the process.

We refuse and firmly hinder any form of violence against women which provokes or can provoke physical, sexual, or psychological damage, including violence threats, coercion, or arbitrary deprivation of personal freedom, both in public and private life. For further information, read our [Global Anti-Harassment Policy](#).

We promote equal opportunities in every level of our organization and **ensure a fair remuneration** for all our employees in compliance with applicable regulations, including the ones regarding minimum wage, working overtime and compulsory benefits.

We recognize the **value of collective bargaining** as a crucial tool to determine contract terms for our employees and the regulation of relations with trade unions.

We reserve the right to assess relevant Third Parties respect our standards and obligations in relation to human rights and corporate sustainability.

WHAT WE EXPECT

We require all our Third Parties, especially the ones who are part of our supply chain, to:



- **adhere to our commitment regarding fundamental human rights, as well as the fight against any form of discrimination, harassment, or abuse;**



- **repudiate and strive to fight any form of slavery, traffic of human beings, forced and child labor;**



- **not adopt any form of abuse, threats, intimidation, bullying, or any behavior that could jeopardize, even potentially, a person's dignity or wellbeing;**



- **adhere to the principle of social and economic equality.**



4.2. People Development & Wellbeing

Our people are our most valuable asset and their personal and professional development is crucial for our success.

WHAT WE DO

In Prysmian, **wellbeing means finding a sense of balance, personal realization, inclusion, security, and vitality** that helps to pursue professional aspiration and have a positive impact on clients, colleagues, and community.

We are committed to **create a positive work environment**, open to dialogue to sharing ideas. We believe in constant training, as it is essential to ensure continuous stimulation for learning skills.

We promote internal growth, including international and cross-functional mobility, in order to contribute to the search for solutions that enrich the personal and professional dimensions while generating value for our Company.

As better detailed in our [Diversity Recruitment Policy](#), we adopt recruitment policies and evaluation processes that prioritize worth and valorize talent, ability, and different individual experiences.

We firmly believe that work-life balance is essential to guarantee both our employees' wellbeing and the quality of their professional performance. We facilitate our employees, in line with Company's needs, to work remotely.

We foster flexibility of our working modes, with special benefits in case of family care and aid needs, as well as parental obligations.

We recognize the value of parenthood for our employees and we provide parents with several supporting benefits to preserve their wellbeing when they have children and ensure they are given a gradual and successful return to work. For further information, read our [Global Parental Policy](#).

Aware that an "always available" working culture is a threat for our employees' psycho-physical health, **we ensure they have the right to disconnect from technological tools outside working hours.**

WHAT WE EXPECT

We encourage our people to :



- **adhere to our equal opportunities and non-discrimination beliefs;**



- **seize new opportunities within Prysmian, by expressing motivation, growth and career aspirations during the performance & development P+ process and applying to open positions in our internal job posting platform;**



- **attend periodic trainings to keep up with the required professional standards.**



5. Stakeholders



5.1. Shareholders

We ensure transparency towards our shareholders, investors and the whole financial community

WHAT WE DO

We guarantee the respect and promotion of our financial communities’ rights, by ensuring a proper remuneration of our investors’ initial investment and by considering their needs.



We provide our employees the chance to buy Prysmian’s stocks at special conditions, aiming at sharing with them the creation of value, mitigating the inflation and offering further benefit tools and rewards both for desk and non-desk workers.

We provide adequate, equal and prompt reporting of our activities to all our shareholders, investors and financial analysts, ensuring the homogeneity and authenticity of social communications as well as preventing the commission of corporate crimes.



WHAT WE EXPECT

We require:

-  any Involved Party having access to or processing Company inside information not to undertake behavior that could escalate into abuse of such information, such as illicit communication of them, insider trading, market rigging and manipulation;
-  all our Third Parties to implement internal control processes aimed at complying with the market abuse applicable regulations and international best practices.



5.2. Clients

Our business strategy is based on listening and respecting our customers' needs, ensuring prompt and qualified responses to their demands.

WHAT WE DO

We do business in line with applicable best practices, **ensuring integrity and respect of the principles stated in our Code**, by offering competitive goods and services.

We guarantee the excellence of our products in terms of sustainability, quality, safety, innovation and reliability, in order **to create a trustful and long-lasting relationship with our customers**, paying constant attention to their needs.

We transmit full and accurate information about our products and services **facilitating our customers' decisions**, protecting their right in not receiving goods and services that are harmful to their health and physical integrity.



We believe in a Customer Excellence approach, providing ideal service in terms of reliability and reduction of delivery time.

We adapt to our customers' demands in different fields, monitoring their satisfaction to develop solutions that may meet expectations in different markets.

We don't ignore customers' claims about potential discrepancies of our products, nor do we disguise non-conformities.

WHAT WE EXPECT

We require:

-  **commit for a responsible usage of our products, optimizing energy efficiency and minimizing waste, extending the useful life of our goods and services;**
-  **adopt practices of regular maintenance and recycling of disused products, helping to reduce the environmental impact.**



5.3. Suppliers

We strive to purchase sustainable goods and services as well as to build with our suppliers relationships based on honesty and fairness.

WHAT WE DO

Our suppliers’ selection follows a transparent, traceable and impartial qualifying process, compliant with fair competition and equal treatment principles.

We choose our supplies not only by considering the quality and competitiveness of their goods and services, but also by considering their **respect of the ethics, integrity and ESG principles** to which we adhere.





We support the adoption of commitments for the **protection of human rights** throughout our supply chain and we promote **responsible sourcing of materials** used for our products. For further information about our Sustainability Supply Chain Strategy, [click here](#).

We aim at **guaranteeing** that the potential purchasing of minerals coming from high-risk or conflict affected countries (i.e. tin, tungsten, tantalum and gold, known as “Conflict Minerals”) is not linked to organizations that directly or indirectly finance or benefit armed groups.

We not only monitor the respect of our Code’s provisions by our suppliers, but we also conduct audits aimed at identifying potential human rights violations and, if they were to arise, **we take prompt actions**.

WHAT WE EXPECT

We require our suppliers to:

-  comply with the applicable regulations during the execution of any activities in name and/or on behalf of Prysmian;
-  adhere to the principles contained in this Code, with regards to human rights, health and safety, as well as respecting our ESG standards;
-  manage responsibly the social and environmental impacts throughout the whole supply chain, protecting local communities, biodiversity and the natural ecosystem of the territories where they operate;
-  guarantee the utmost transparency and reliability towards their own supply chain.

5.4. Local Communities

We respect local communities’ rights and feel the responsibility of supporting social and economic development, establishing partnerships with research institutions, universities, and schools.

WHAT WE DO

We contribute to the development of communities where we operate and we believe in the need to create long lasting relationships, by providing efficient services and technologically innovative products, encouraging the employment of local labor.

We believe that dialogue with competent institutions is a key driver for the identification of local communities’ prioritized areas of support.



Throughout the design and development of our products, **we consider their ecological footprint.**

We support social, cultural, and educational local initiatives focused on the promotion and improvement of one’s quality of life, by also making economic or in-kind contributions.

We organize several corporate volunteering activities, by **offering our employees the opportunity to devote part of their working time to services in support of communities and specific social causes**, compatibly to corporate needs.

WHAT WE EXPECT

All the Involved Parties are required to:

-  **adhere to our commitment to enhance local communities, by recognizing their culture and safeguarding their needs;**
-  **foster a sustainable and long-lasting local growth, by upholding, whenever possible, our social, cultural and educational initiatives.**



5.5. Authorities and Institutions

We establish with local, national and international Authorities dialogues directed at transparency and mutual collaboration.

WHAT WE DO

Prysmian's interests and positions towards authorities and institutions' representatives are manifested, in compliance with the ethical principal of integrity and transparency to which we adhere, solely by subjects authorized in line with the proper delegation of powers and authority system.

We avoid and hinder any form of behavior that is or might be perceived as collusive or contrary to our Anti-corruption policy.



WHAT WE EXPECT

We require all the Involved Parties to :

-  ○ **when dealing with authorities and institutions, be transparent and always comply, never taking shortcuts;**
-  ○ **refrain from facilitating any kind of undue influence that could jeopardize our integrity and reputation.**
-  ○ **not make contributions and give preferential treatments or other privileges – nor donate valuable/lavish objects – to parties, trade unions or other political organizations and government representatives, with the aim of promoting or favoring Prysmian's interests.**



6. Integrity



6.1. Anticorruption

We do not tolerate any form of corruption, even if only tempted or suspected, in any Country where we operate, with both governments and the private sector.

WHAT WE DO

We always operate with transparency, fairness and integrity, considering corruption not only as a crime, but also as a threat to our business activities, an obstacle for sustainability and a risk to our reputation.

We have adopted an [Anticorruption Policy](#) in order **set forth the main rules of conduct that must be followed and raise the awareness on Prysmian's zero tolerance for bribery and corruption.**

We prohibit donations, gifts, offers, benefits, and business opportunities that are not in line with the principles defined by this Code or other Prysmian policies, applicable laws, and regulations, as well as international standards and best practices, including ISO:37001 Guidelines.



WHAT WE EXPECT

All Involved Parties must:



- not give, promise, or receive undue benefits or compensations – directly or indirectly – within relations with government representatives, business partners or any third party, for the purpose of influencing the business conduct and/or gain an improper advantage for themselves or the Company along the activities performed in name or on behalf of Prysmian;



- follow our guidelines regarding gifts and entertainment, as well as business courtesies;



- follow our due diligence requirements, as defined by the Third-Party Program.

6.2. Antitrust

We recognize the importance of fair competition and are committed to comply with the antitrust regulations in every country where we operate.

WHAT WE DO

We define our business objectives in full autonomy and independence with **respect to our competitors and promote a sustainable growth.**

We expressly forbid any business practice that may hinder, alter, or distort fair competition within the market.

We do not adopt any form of anticompetitive behavior, especially with reference to cartels (both between competitors and parties operating at different levels of the supply chain), abuse of dominant position and the exchange of sensitive information, also in the context of trade associations or similar bodies.

We have implemented an [Antitrust Policy](#) that provides the **main rules to be observed as to ensure compliance with applicable antitrust laws and regulations.**

We conduct periodic antitrust risks assessments and perform both online and in-person trainings and awareness initiatives in support of our employees.

WHAT WE EXPECT

All Involved Parties must:

-  **refrain from undertaking any act, omission or behavior that could lead to a violation, committed or attempted, of competition rules;**
-  **refrain from sharing competitively sensitive information with competitors or their representatives;**
-  **not manipulate, in any way, any bidding processes;**
-  **actively disassociate from any situations in which improper agreements or information sharing between competitors are raised.**



6.3. Information, Books and Records

We are aware of the importance of complete, proper, accurate and prompt information regarding our business activities.

WHAT WE DO

We pursue transparency, fairness and clarity when interacting with our stakeholders, to the extent compatible with confidentiality requirements and applicable regulations.

We ensure that management decisions are based on sound financial analysis based on complete facts with appropriate consideration of short- and long-term risks.

We ensure the drafting and availability of books and records with a reasonable level of details, accurately and properly depicting all our transactions and involved parties, taking care to store the documentation according to time and manners as provided by the applicable regulations.



WHAT WE EXPECT

All Involved Parties must:

-  not accept nor make irregular and/or unregistered payments;
-  not misrepresent financial results or non-financial metrics (on which operating decisions are often based) to meet performance goals;
-  keep clear and transparent records as per applicable regulation and international standards;
-  not indicate false or altered items in books and records, as well as run secret or unregistered funds.



6.4. Export Controls and Economic Sanctions

We believe compliance with economic sanctions and export controls is crucial for the protection of our long-term interests.

WHAT WE DO

We adhere to export control laws, which regulate cross-border transfer of goods, software and technology, as well as to economic sanctions, which are political trade restrictions and can be comprehensive or targeted.

We have adopted an Export Controls Policy that provides several measures, among which:

- I. monitoring of countries and relevant Third Parties subjected to restrictions, along with the level of applicable restrictions;
- II. due diligence of relevant Third Parties, to finalize transactions according to international regulation;
- III. classification of products to determine applicable export and import requirements;
- IV. training for all employees and specific in person sessions for personnel involved in international trade operations.

WHAT WE EXPECT

To the extent applicable, it is all Involved Parties' priority and obligation to:

-  **respect all applicable laws on export and import controls tied to transactions, sales of assets, software, technologies, and provision of services, including transactions and financial intermediation activities;**
-  **use the export classification of goods, software or technology to determine if they require government authorization and/or license for export;**
-  **provide accurate and complete product descriptions when classifying goods.**

6.5. Anti-Money Laundering

We keep us safe from money laundering, self-laundering and the fencing of goods and services coming from criminal activities.

WHAT WE DO

We only conduct **business with reputable customers** who are involved in genuine business activities and whose funds come from legitimate sources.

We do our business solely with relevant Third Parties that **share our ethical and integrity values**.

We implement a preliminary due diligence system for Third Parties at risk we do business with, by evaluating their **reputation and legitimacy**.

Our commercial and financial transactions are handled in a transparent way, by **guaranteeing transparency of operations** with respect of the applicable laws.



WHAT WE EXPECT

We require all Involved Parties to:



- refrain from acquiring, exchanging or transferring money, goods or other utilities while being aware of the criminal origin of the latter, or performing in relation to the latter other operations, aiming at hindering the identification of their illegal origin;



- follow applicable laws and best practices concerning acceptable forms of payments.



6.6. Conflict of Interest

We prevent and handle any situation – actual or potential – of conflict of interest, ensuring fair and impartial decision making.

WHAT WE DO

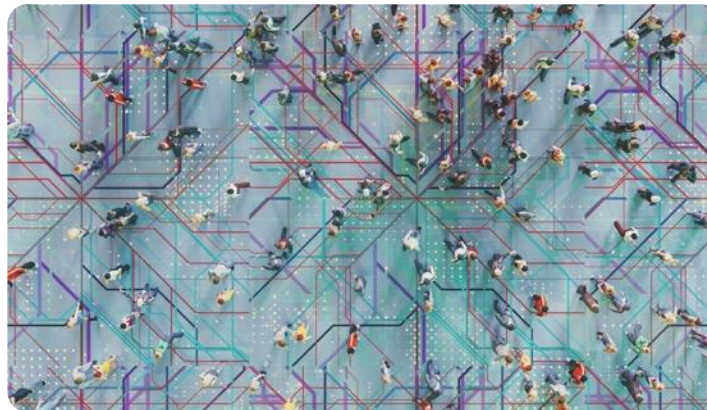
We make business decisions based on what is objectively best for Prysmian, never what is personally best.

A conflict of interest may impede making decisions and performing one's own duties objectively and impartially, obscuring and interfering with Prysmian's interest in a legitimate exercise of business activity.

We stress the importance of reporting situations and/or activities that could lead to a conflict of interest.

We have adopted a procedure that provides rules and guidelines necessary to comprehend, identify and report a potential conflict of interest.

On a yearly basis, **we monitor situations (even if only potential) of conflicts of interest of all our desk workers and we provide periodical trainings.**



WHAT WE EXPECT

We require all Involved Parties to:

-  act correctly and transparently;
-  declare actual, potential or perceived situations of conflict of interest;
-  not engage in illegitimate favoritisms, collusive practices or solicitations of personal advantages, aiming at ensuring the protection of Prysmian's interests;
-  avoid any activity which creates the potential perception of a conflict of interests, by not using Prysmian resources for personal gain.

6.7. Confidentiality of Information and Intellectual Property

We believe in the importance of privacy of confidential information and deem that intellectual property constitutes a key asset.

WHAT WE DO

The protection of all Prysmian’s assets – including patents, brands, distinguishing marks, trade secrets, copyrights, logos, and know-how – as well as our stakeholders’ digital rights, is an essential factor to us.

We adopt all the necessary measures and precautions to preserve Prysmian’s intellectual assets’ integrity and confidentiality.




We protect the security of corporate information to avoid that they are improperly disclosed creating potential economic and reputational damages to the Company.

While drafting contracts, we negotiate dedicated clauses and confidentiality obligations aiming at ensuring the protection of intellectual property and corporate secrets.



WHAT WE EXPECT

We require all Involved Parties to:

-  ○ classify, store and share Prysmian’s data, information and documents aiming at preserving our intellectual assets’ integrity;
-  ○ ensure that access to information is granted only to individuals with a legitimate authorization;
-  ○ not disclose proprietary information owned by Prysmian to a Third Party without the proper internal approval and the required confidentiality agreement.



6.8. Privacy and Cybersecurity

We are committed to protect digital rights and privacy of our employees, clients, suppliers and other Involved Parties, by processing, storing, and reusing data solely necessary for the performance of our activities

WHAT WE DO

We ensure that all the information is dealt with by abiding by principles of **lawfulness, fairness, and transparency**, so that personal data are uniquely handled for specific, explicit, and legitimate purposes.

We strive to adopt all technical and organizational measures appropriate for **satisfying regulatory requirements in the field of personal data protection**.





We periodically **assess, monitor, and improve our cybersecurity level**, by promptly reporting possible vulnerability of the system and protecting our data and products security.

By **protecting our digital assets**, we contribute to the long-term viability and resilience of our business, minimizing potential disruptions and environmental impact.

To ensure a proper level of confidentiality and protection, we adopt an information security management system in **compliance with the requirements provided by applicable laws and regulations**, as well as international standards, including ISO:27001 Guidelines, and best practices.

WHAT WE EXPECT

We require all Involved Parties to:

-  limit access to or processing of personal data only to what is necessary for specific legitimate business purposes;
-  keep personal Information only as long as necessary, following applicable retention schedules and secure deletion procedures;
-  use only authorized systems and tools for storage, transmission and backup of Prysmian information;
-  prevent the loss, unauthorized access and disclosure of personal data and confidential information, in strict compliance with the rules regarding privacy and personal data protection determined by applicable regulations.

7. Observance and Updating of the Code



7. Observance and Updating of the Code

All Involved Parties shall strictly comply with this Code, as well as other Policies and procedures adopted by Prysmian, where applicable.

OBSERVANCE

All Involved Parties must comply with the principles of our Code of Ethics. Whomever violates the Code and/or the applicable Company policies or procedures' provisions could be subject to legal actions and/or disciplinary measures, up to: (i) the termination of the employment relation, (ii) the termination of the contract or (iii) the interruption of the business relation.

The observance of the Code falls within the measurement criteria used for our employees' performance evaluation, so as to define an integrity and compliance model.

REPORTING

Prysmian encourages an open reporting culture. All Involved Parties, whenever they want to ask a question or report a violation, even potential, of this Code, the relevant Prysmian's policies or any applicable laws, could raise a concern through the channels indicated in the [Helpline Policy](#). Prysmian is committed to investigating any reports received with the utmost confidentiality and prohibits any retaliatory behavior against whomever has raised a concern on reasonable grounds.

UPDATING

The Code lives and evolves with the development of our organization and business in the competitive context in which we operate.

The review of this Code must be approved by the Prysmian S.p.A. Board of Directors, pursuant to the positive opinion of the Control and Risk's Committee.

**Approved by Prysmian S.p.A. Board of Directors
July 31st, 2024**



prysmiangroup.com