

# HELPLINE POLICY

APPROVED BY PRYSMIAN S.p.A  
BOARD OF DIRECTORS ON 08/02/24

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## LEADERSHIP MESSAGE

Prysmian (hereinafter the “Company”) is committed to the highest standards of integrity and compliance. This requires you to be alert and to ask a question or report a concern if you need guidance or suspect that there has been or may be a violation of any applicable law or regulation, the Prysmian Code of Ethics (hereinafter “Code of Ethics”) or any other Company policy or procedure.

Read and understand the Code of Ethics particularly noting the sections related to your function, work situation and area. In addition to the many tools, resources and policies referenced in the Code of Ethics and in this Policy, you will also find a number of people you can turn to for assistance.

If anything is unclear in the Code of Ethics or in any Company Compliance Policy we invite you to reach out the Group Compliance Function, whereas if you have a concern that you would like to raise, you can avail of every reporting channel better detailed in Section 6 of this Policy. Only by asking a question or reporting a concern can a potential situation be promptly and effectively addressed.

You can be assured that your questions and concerns will be taken seriously, handled confidentially and that you will not be retaliated against in any form because you asked a question or reported a concern that you had reasonable ground to believe is true.

Prysmian has adopted this policy as part of its commitment to integrity, transparency and operating in an ethical manner in all aspects of its operations. We are operating as *One Company* and in accordance with our Code of Ethics and values we are obligated to raise potential questions or concerns. By complying with this Policy, we take ownership in achieving this goal.

Thank you for your commitment to integrity and safeguarding our reputation.

**Massimo Battaini**

Prysmian CEO

## 1. PURPOSE & OBJECTIVE

The purpose of this Policy is to ensure Company employees feel comfortable asking questions or reporting concerns regarding a potential violation of any applicable law, regulation, the Prysmian Code of Ethics, or any other Company policy or procedure. This policy provides further detailed guidance and support on the handling and review of questions or concerns.

This Policy the Whistleblowing Management System and its processes are based upon the standards set by the ISO:37002 guidelines and the applicable laws and regulations, including – but not limited to – the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (hereinafter, “Whistleblowing Directive”).

## 2. POLICY OWNER

Group Compliance Function owns this Policy and is responsible for periodically reviewing and updating it to ensure it accurately reflects organizational updates or legal and regulatory changes.

## 3. WHERE TO GO FOR HELP

Questions or concerns regarding this Policy or potential violations of the Prysmian Code of Ethics should be addressed to the [Integrity First Helpline](#), the competent Regional Compliance Team, the Internal Audit Function or the relevant Local Helpline Contact Point (see Appendix D for details). Further guidance may be found at the Ethics & Integrity Section of the [Corporate website](#) and in the correspondent Section of [Company's Intranet](#), accessible to employees.

## 4. APPLICABILITY

This Policy applies to all interns, employees, officers, directors of all legal entities of Prysmian, notwithstanding the possibility to raise a concern is extended to any third party that acquired information on breaches through work-related activities with Prysmian (e.g. shareholders,

sales agents, suppliers, customers, former employees, job applicants and volunteers) (jointly referred to as “Prysmian Stakeholders”)<sup>1</sup>.

The applicability of this Policy has also been determined in order to respond to the needs and expectations of Prysmian's Stakeholders regarding the helpline management system implemented by the Company. In this sense, below are the Prysmian Stakeholders that have been considered most relevant pursuant to the Standard ISO:37002 – Whistleblowing Management System, and the respective interests they hold:

- a) shareholders and financial institutions: they are interested in the creation of economic value, risk management and information transparency and, as such, require the Company to promote a corporate culture oriented towards open reporting;
- b) Public Administrations: they are interested in establishing collaborative relationships with the Company based on compliance with current legislation and the possibility of activating reporting mechanisms in the presence of possible violations;
- c) local communities: they believe in access to information, in conducting business in an ethical manner, in the protection of the environment and safety, as well as in being able to effectively present their requests, also through specific reporting channels made available by the Company;
- d) employees, officers, managers, directors, candidates: they have an interest in business ethics and integrity and, in particular, they believe in compliance with external and internal standards by the organization for which they carry out their activity and believe in a work environment that allows them to report any possible violations;
- e) suppliers, contractors, sales agents, customers and other so-called *business partners*: they expect to establish business relationships with the Company based on compliance with current regulations and to have the possibility of being able to report to the Company any violations occurring within the contractual relationship.

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<sup>1</sup> The mapping and analysis of stakeholders who may impact or be impacted by the activities of the Prysmian is carried out as part of Prysmian's sustainability and stakeholder engagement analysis. In particular, the categories of stakeholders are identified through an internal analysis updated periodically, based on the AA 1000 standards and the *Global Reporting Initiative*.

## 5. 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 Code of Ethics and any other applicable policy;
- c) report immediately to the appropriate channels better detailed in Section 6 any alleged violation, both if committed a Prysmian employee and a Prysmian Stakeholder;
- d) ask questions or report any concerns related to this Policy;
- e) complete assigned training related to this Policy when required.

Additionally, Prysmian officers, directors, managers and supervisors must always:

- ✓ act as ethical role models;
- ✓ be always available to receive concerns/questions, offering support and guidance;
- ✓ foster a positive working environment where respect is paramount and where diversity of opinion is welcome;
- ✓ encourage an open reporting environment where Prysmian people feel comfortable in asking questions or reporting concerns;
- ✓ timely and appropriately escalating issues or concerns when necessary;
- ✓ make sure any corrective action taken is consistent with Company policies and procedures;
- ✓ identify key risks and ensure your direct reports receive the necessary training and equipment that employees need to work safely and in compliance with the law.

## 6. HELPLINE – KEY CONCEPTS

### 6.1. How to Report a Concern

In compliance with best practices, including the ISO:37002 guidelines, the latest legal and regulatory requirements and with the aim of disseminating an open-reporting culture within

the workplace, Prysmian has implemented several channels through which it is possible to raise a concern.

### Integrity First Helpline

First and foremost, Prysmian has implemented a dedicated and secure Group reporting channel, known as *Integrity First Helpline*, that is managed by an external independent company which has a binding mandate to protect the identity of all who use the Helpline and to preserve the confidentiality of the reported concerns.

Any concern raised through the Integrity First Helpline will be exclusively visible to the Group Compliance and Internal Audit Functions.

The *Integrity First Helpline* is available 24 hours a day, 7 days a week, in all of Prysmian's languages and offers several means allowing any Company employee and/or Prysmian Stakeholder to report a concern or ask a question:

- E-mail: [Helpline@prysmian.com](mailto:Helpline@prysmian.com)
- Internet: [www.prysmian.ethicspoint.com](http://www.prysmian.ethicspoint.com)
- Telephone: refer to Appendix C for country-specific phone numbers.

It is also possible to access the [Integrity First Helpline](#) dedicated web-page directly through the Ethics & Integrity Section of the [Corporate website](#) and in the correspondent Section of [Company's Intranet](#), accessible to employees.

### Group Compliance and Internal Audit

Furthermore, any Company employee may contact the competent Regional Compliance Team or the Internal Audit Departments, sending an e-mail, via phone or requesting a face-to-face meeting. It must be understood that in case a Company employee who is not part of such Departments receives either a written or verbal Helpline concern/issue, he/she must:

- a) treat the matter confidentially and protect any personal data/information;



- b) communicate to the whistleblower that he/she is required to report the concern to the *Integrity First Helpline* or to the other available channels.

#### Local Helpline Contact Point

In compliance with the Whistleblowing Directive and the related transposition measures, in any EU Member State where we employ cumulatively more than 249 employees, we have established – in addition to the *Integrity First Helpline* – a local channel through which it is possible to raise a concern (either verbally, in writing or personally requesting a face-to-face meeting), that offers appropriate guarantees of independence, confidentiality, data protection and secrecy and ensures the absence of language barriers.

For the list of such countries and the contact details of each Local Helpline Contact Point, please see Appendix D.

#### Supervisory Body pursuant to Legislative Decree no. 231/2001 ("Decree 231")

For the Italian legal entities, it is also possible to report to the competent Supervisory Board ("*Organismo di Vigilanza*") any relevant concern pursuant to the Italian Legislative Decree no. 231/2001.

## **6.2. Concerns to be Reported**

All Company employees are obligated to report a concern regarding a violation or potential violation of any applicable law, regulation, the Prysmian Code of Ethics, or any other Company policy or procedure. Some examples of concerns include, but are not limited to:

- a) financial or accounting fraud;
- b) behaviors not compliant with controls;
- c) bribery & corruption;
- d) human right issues, including child and forced labor;
- e) harassment, intimidation or discriminatory conduct;
- f) health, safety and environment matters;
- g) falsification of records;

h) conflicts of Interest.

It is not necessary for the reporter to have observed the violation or have factual documents to support it. A valid and legitimate suspicion is sufficient to report a potential violation or concern, provided that, in light of the circumstances and the information available at the time of reporting, the whistleblower has reasonable grounds to believe that the matters reported are true.

On the contrary, those who deliberately and knowingly report wrong or misleading information do not enjoy protection and may be subject to disciplinary measures.

The information provided by the reporter should be sufficiently precise and complete in order to conduct a thorough investigation. It is forbidden for the reporter, or anyone else aware of the concern, to start making inquiries or investigate into the matter reported.

Responsibility over the investigation is exclusively of Group Compliance, ensuring adequate information to the Internal Audit Function. It is understood that, where the concern is addressed to the Local Helpline Contact Point, it is the latter to be responsible of the investigation.

You are also required to immediately report a concern to the Group Compliance and Corporate Affairs Departments if you have been notified of an investigation, lawsuit or other inquiry by a regulatory authority or other external party. Such notifications can come in various forms, including written and verbal requests for information or written notification.

Immediate notification is essential to ensure any privileged documents are appropriately protected and documents relating to the investigation, lawsuit, or other inquiry are properly retained. Facts for which on-going investigations by public authorities are known or subsequently become known to exist will not be treated under the provision of this Policy.

### **6.3. Guarantee of Confidentiality**

The identity of the reporter and the facts reported are processed under conditions of strict confidentiality at all the stages of the process unless otherwise required by law or as foreseen in the last paragraph here below. When reporting a concern, the reporter is encouraged to disclose his/her identity in order to be contacted at a later date to provide additional information or details about the case.

The reporter may also remain anonymous if so desired. In this case, it is important to provide sufficiently detailed information to enable the concern to be properly reviewed and investigated (for example, names of individuals involved or who may be aware of the issue, times, and dates of the incident).

The reporter's identity and the facts reported will be kept confidential at all the stages of the process and will not be disclosed to any Company employee or third parties, but may need to be disclosed to public authorities or relevant people in case of needs resulting from the additional investigations.

### **6.4. No Retaliation**

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 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.

Any adverse employment action against a reporter may constitute retaliation. Examples of retaliatory behaviour include but are not limited to:

- a) harassment, coercion, intimidation or ostracism;
- b) discrimination or unfair treatment;
- c) discipline measures;

- d) suspension or dismissal;
- e) denial of promotion, benefits or pay;
- f) negative performance assessment or employment reference.

If a reporter believes he or she has been subject to retaliation, the reporter shall raise a concern according to this Policy. Any employee who retaliates against someone who has reported a violation will be subject to disciplinary procedures, including possible dismissal.

To the extent permitted by the applicable requirements, such protection may be extended to the persons supporting the whistleblower in the reporting process in a work-related context (i.e. the so-called “facilitators”), as well as to the reporter’s colleagues, family members and relatives.

## **6.5. Employee Responsibility**

If you are involved in a Helpline investigation or assessment in any way, you must:

- a) cooperate when your assistance or the assistance of any person under your supervision, is sought;
- b) make yourself, any person that you supervise, and relevant documents and information available;
- c) answer questions truthfully;
- d) volunteer any information in good faith that you believe it could be useful;
- e) not make recordings of compliance-related interviews conducted in person or via telephone or videoconference without the prior written consent of the VP Group Compliance or designee (note: the Case Manager may record the interview. The interviewee will be made aware of this prior to commencement of the interview);
- f) keep confidential any information that you receive as part of a review or investigation, including the existence of the review, the persons involved and the factual issues;
- g) not engage in retaliatory conduct against individuals who may have asked a question or raised a concern.

Note that any communications made using a Prysmian computer, telephone, mobile device or other equipment, and the information stored therein, are Company property and, where

permissible under local laws, may be searched without your knowledge or consent. Any access to electronic data – including e-mail – as part of investigation or assessment will need to be approved by the VP Group Compliance or designee.

## 6.6. External Reporting of Concerns

### Outside Authorities

Nothing in this Policy prohibits a Prysmian employee, a Prysmian Stakeholder or an authorized subject from reporting potential violations to any governmental agency/entity or competent public authorities, to the extent permitted by the applicable laws and regulations. Employees do not need Prysmian's prior authorization to make any such reports or disclosures and are not required to notify Company that such disclosures have been made.

Pursuant also to the Whistleblowing Directive, for the list of the main competent authorities designated in each EU Member State and the respective contact details, please see Appendix D.

### Public Disclosure

To the extent permitted by the applicable laws and regulations, it is also possible to make a public disclosure of the report (e.g. through online platforms or social media, or to the media, elected officials, trade unions or professional and business organizations), provided that the following – minimum – criteria are met:

- a) the person has previously reported through the appropriate channels (both internal and/or external) without any appropriate and timely action/response taken; or
- b) the person has reasonable grounds to believe that: (i) the breach may constitute an imminent or manifest danger to the public interest; or (ii) there is a risk of retaliation or a low prospect of the breach being effectively addressed.

## 6.7. Data Collected and Processed

Personal data collected for the purposes of the investigation must be adequate, relevant and not excessive in relation to the purposes for which they are collected or further processed and shall be kept for an appropriate period of time.

The personal data processed within the investigations should be limited to the data strictly and objectively necessary to verify the allegations made. If accidentally collected, personal data that are manifestly not relevant for the handling of a specific report are deleted without undue delay. Incident Reports are kept separate from other personal data.

Personal data shall be kept in compliance with applicable laws at all times.

## 7. ROLES AND RESPONSIBILITIES

### 7.1. Helpline Committee

The Helpline Committee meets on a quarterly basis in order to:

- a) examine the Quarterly Helpline Report of concerns received by the VP Group Compliance;
- b) evaluate the status and results of the investigations carried out by the entrusted functions and indicates the Investigation Reports to be included in the proposal of dismissal to be submitted for approval to the relevant controlling bodies;
- c) evaluate any corrective or disciplinary actions to remedy the concern or allegation reported;
- d) periodically monitor the Whistleblowing Management System jointly with the Group Compliance and Internal Audit Functions.

The Secretary of the Helpline Committee (as defined in Section 7.3) classifies the Incident Reports received and, in agreement with the Chief Risk & Compliance Officer and the Chief Audit Officer, assigns, as appropriate, the investigation activities to the competent Regional

Compliance Team, the Internal Audit Department and/or further competent Functions (e.g., Human Resources, Legal/Corporate Affairs, as well as external consultant, if necessary and based on requested professional competences.

## 7.2. Chief Risk & Compliance Officer and Chief Audit Officer

The Chief Risk & Compliance Officer and Chief Audit Officer shall:

- a) in case of a Significant Investigation (see Appendix A), set up the appropriate investigative team, oversee the investigation and promptly inform the competent corporate bodies;
- b) when necessary, liaise and coordinate with any other internal Function and/or with external advisors entrusted for the performance of the investigation;
- c) provide periodic updates of Helpline related matters to the Control and Risk Committee as well as to the Board of Statutory Auditors during their regular meetings. The information is consolidated in the Quarterly Helpline Report;
- d) for the Italian legal entities, promptly inform the relevant Supervisory Body ("*Organismo di Vigilanza*") of any relevant concern pursuant to the Italian Legislative Decree 231/2001.

## 7.3. VP Group Compliance

The VP Group Compliance acts as the Secretary of the Helpline Committee and calls its meetings also based on Incident Reports received. The VP Group Compliance manages the operational flow of the *Integrity First Helpline*.

The duties of the VP Group Compliance include the following:

- a) receive the Incident Reports from the Prysmian Helpline Service Provider;
- b) assign the investigation to the most appropriate Function (at central, Regional and/or local level)
- c) oversee the investigation, also on behalf of the Helpline Committee;
- d) evaluate the conclusion of the investigation to ensure consistency and prepare the Investigation Report;

- e) liaise and coordinate with any other internal Function and/or with external advisors potentially entrusted by the Helpline Committee for the performance of the investigation;
- f) maintain the *Integrity First Helpline* and guarantee that all Incident Reports and related Investigation Reports are properly recorded and retained
- g) review the Investigation Report and submit it to the Helpline Committee.
- h) oversee the Whistleblowing Management System.

#### **7.4. Internal Control Bodies**

##### Control & Risks Committee

The Control & Risks Committee:

- a) receives the Quarterly Helpline Report;
- b) evaluates the results of the Significant Investigations;
- c) Allocates and checks the budget of the Significant investigations.

##### Board of Statutory Auditors

For the Italian legal entities, the competent Board of Statutory Auditors pursuant to the Italian laws receives the Quarterly Helpline Report with respect to the Incident Reports received and evaluates the results of the investigations.

The Board of Statutory Auditors of the parent company shall have access to the Group reporting channel, known as *Integrity First Helpline*, and to the Local Helpline Contact Points.

It is understood that the Board of Statutory Auditors of the parent company will be promptly informed by the Chief Risk & Compliance Officer and/or the Chief Audit Officer regarding the Significant Investigations.

##### Supervisory Body pursuant to Decree 231



For the Italian legal entities, the competent Supervisory Body pursuant to Decree 231 (“*Organismo di Vigilanza*”), receives reporting from the Chief Risk & Compliance Officer and/or Chief Audit Officer or designees with respect to the Incident Reports relevant pursuant to the Decree 231 and evaluates the results of the investigations.

## 7.5. Whistleblowing Management Function

According to the ISO:37002 guidelines, the Whistleblowing Management Function, assigned to the Group Compliance Function, has the responsibility and authority for:

- a) the design, implementation, management and monitoring of the Whistleblowing Management System;
- b) ensuring that the Whistleblowing Management System is designed and resourced to ensure: (i) comprehensive assessments of reports and potential risks; (ii) impartial and timely investigations and (iii) appropriate protection and support measures;
- c) ensuring, to the maximum extent possible in the organization, that investigation and protection functions are delivered independently (i.e., provided by different persons or areas), while recognizing that each may be assigned to existing functions;
- d) providing advice and guidance on the Whistleblowing Management System and issues relating to reporting wrongdoing;
- e) reporting on a planned and *ad hoc* basis on the performance of the whistleblowing management system to the governing bodies, top management and other relevant Functions, as appropriate.

It is responsibility of the Whistleblowing Management Function to ensure the integrity, impartiality, authority, transparency and independence of the whistleblowing management system and its processes.

The Whistleblowing Management Function has direct, unrestricted and confidential access to top management and the governing bodies.

## 8. INTEGRITY FIRST HELPLINE – PROCESS

### 8.1. Question and Concern Intake & Preliminary Assessment

1 – Questions and concerns reported through the *Integrity First Helpline* will be promptly assessed on a preliminary basis by VP Group Compliance to determine the nature of the concern.

2 – Reported questions/concerns will be assigned an identification number to enable tracking of the question or concern and the ability, for those who wish to remain anonymous, to follow up, receive a response and/or provide more information.

3 – The information provided by the reporter will be consolidated in an Incident Report. Amongst other things, Group Compliance will:

- a) examine and classify Incident Reports based on their content;
- b) evaluate whether the concern or question is valid and there is merit to proceed to an investigation;
- c) propose the dismissal of those reports that are clearly unfounded or based on wrong or misleading information;
- d) assign the investigation activity either to the competent Regional Compliance Team, the Internal Audit Department, or other relevant Company Functions (such as, by way of example, Human Resources and Legal/Corporate Affairs Departments), as well as external advisors, when deemed necessary in relation to the professional expertise needed.

The Incident Reports are filed in the *Integrity First Helpline* which summarizes all the essential information of the concerns received. The responsibility of the *Integrity First Helpline* maintenance is entrusted to the Group Compliance Function who guarantees that all the data and information contained therein are treated in accordance with the highest standards of security and confidentiality.

## 8.2. Case Management & Review

1 – Each question or concern will be assigned to an appropriate Case Manager, who ensures to provide the reporter with a notice of receipt of the report within seven days of receiving it.

2 – The Case Manager will interview the reporter, if the identify is disclosed, to discuss the question or concern, gather information and clarify any issues to help formulate the scope of the review/investigation.

3 – The Case Manager will agree with the VP Group Compliance or designee the work plan for the review or investigation. The VP Group Compliance or designee shall, where appropriate, review the work plan with the management of the relevant Functions.

4 – The VP Group Compliance or designee will liaise with the Case Manager on a regular basis to provide oversight and receive updates on the progress of the review/investigation.

5 – Reviews are to be conducted irrespective of an individual's position or tenure within Prysmian and will be completed as soon as reasonably practicable while maintaining a thorough and fair review.

6 – If deemed necessary, the Case Manager may seek assistance in any review from other Prysmian employees. The Case Manager will discuss the engagement of these support resources with the VP Compliance or designee. Depending on the scope and nature of the review, Case Managers may require assistance from outside advisors (such as legal counsel, external auditors, accountants, fraud investigators, information technology experts, etc.) but must obtain prior approval of the Chief Risk & Compliance Officer and/or Chief Audit Officer or VP Compliance before retaining such advisors.

7 – The individual(s) involved or subject of the investigation will be notified about its evolution, appropriately to the type of question asked or concern raised and within the limits of what established within Section 6 of this Policy.

8 – The Case Manager will conduct interviews of relevant personnel, solicit and review data and documentation, perform inquiries, and validate information available on the Incident Report in order to evaluate and confirm if the reported concern is factually substantiated.

9 – Once the investigation is concluded, an Investigation Report is prepared and presented to the VP Group Compliance or designee, which either approves the inclusion in the dismissal proposal in the Quarterly Integrity First Helpline Report to be submitted to the Control and Risks Committee or requests further investigation work to be performed.

10 – Once the dismissal proposal of an Investigation Report is approved by the Helpline Committee, the Chief Risk & Compliance Office and/or Chief Audit Officer or designee adds the report to the Quarterly Integrity First Helpline Report, which is submitted to the Control & Risks Committee or the further internal control bodies, if needed.

11 – Once investigations are closed, the Case Manager shall provide feedback to the reporter within a reasonable timeframe, in any case not exceeding three months from the date of receipt of the concern or from the expiration of the seven-day period from the raising of the concern. Where necessary or appropriate, the Case Manager ensures adequate and timely communication to the management of the relevant Functions. Regulatory disclosure or regulatory reporting may be required and will be performed as appropriate.

### **8.3. Corrective Actions**

Once a review or investigation is concluded and if the concern has been confirmed, the Case Manager may recommend that certain corrective actions be taken by assigned owners and within a designated timeframe. The Case Manager will monitor status of any corrective actions that have been recommended to ensure completion.

### **8.4. Disciplinary Actions**

The conclusion of the investigation may indicate that a disciplinary action is necessary in case of illegal or unethical conduct attributable to any Prysmian employee. This determination

will be made where permissible by law and other contractual obligations in compliance with HR policies and procedures applicable from time to time.

The types of disciplinary actions include, but are not limited to:

- a) any relevant concern pursuant to the Italian Legislative Decree Coaching;
- b) verbal Reprimand;
- c) written Reprimand;
- d) suspension;
- e) termination;
- f) additional legal action (e.g. civil or criminal prosecution)

Additionally, disciplinary actions may be taken against reporters who have deliberately and knowingly report wrong or misleading information or individuals who, as part of the investigation, have not been honest and truthful or have not properly assisted or collaborated.

## 8.5. Reporting

Group Compliance will:

- a) maintain a log of all concerns and the status of investigations and corrective actions. This information will be summarized and reported to the Risk and Control Committee on a regular basis and, where necessary or appropriate, to further governing and/or internal control competent bodies;
- b) monitor the status of corrective actions to ensure they are completed in a timely fashion;
- c) ensure that any concerns that must be reported to a regulatory agency are so reported on a timely basis and appropriate data are provided;
- d) analyze and interpret trend data from questions and concerns to drive proactive communication and training to Prysmian employees.

Prysmian employees who have asked a question or raised a concern will be kept apprised of the status of their question or concern where appropriate. The Case Manager will provide appropriate feedback to the reporter and, where appropriate, to those individuals who were interviewed as part of the investigation, once the review is closed.

## 9. 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 applicable legislation.

The Company reserves the right, at its sole discretion, to disclose information about violations of law by Prysmian employees to relevant regulatory agencies.

## 10. 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 above.

## 11. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT OF THE WHISTLEBLOWING MANAGEMENT SYSTEM

Group Compliance Function is responsible to perform periodic reviews and updates of this document, examining, in particular, revisions to be made 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. Specifically:

- a) the Group Compliance Function regularly monitors the Whistleblowing Management System in conjunction with the Helpline Committee, identifying any potential deviation of the Policy and/or improvement opportunities;

- b) as defined by the ISO:37002 Audit, this Policy, the Whistleblowing Management System and its Processes will be audited by Internal Audit at least every 3 years, based on Internal Audit's own Risk Assessment.

The system and processes can be adapted at any time according to the results of these audits and monitoring activities, to better suit the needs of Prysmian.

## 12. 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) Anti-Corruption Policy;
- c) Antitrust Policy;
- d) Export Controls Policy;
- e) Fraud Management Policy;
- f) Gifts and Entertainment Policy;
- g) Third Party Program;
- h) Conflicts of Interest.

**Policy Approved by: Prysmian S.p.A. Board of Directors**

**Approval Date: February 8<sup>th</sup>, 2024**

## ANNEX A – DEFINITIONS

- **Case Manager:** Any person designated by VP Group Compliance to coordinate, supervise and conduct the review or investigation of a particular question or concern.
- **Concern:** Any concern about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian, including but not limited to the Prysmian Code of Ethics.
- **Control & Risks Committee:** The Control & Risks Committee of the Prysmian Board of Director's purpose is to assist in Board oversight of the integrity of the Company's financial statements, the Company's compliance with legal and regulatory requirements, the independent auditor's qualifications and independence, and the performance of the Company's internal audit function and independent auditors.
- **Corrective Action:** An action that addresses, responds to or mitigates issues identified during a review of a question or concern. Examples may include revision of policies and procedures and disciplinary action.
- **Disciplinary Action:** An action identified during a review that addresses the actions of a violation of the Prysmian Code of Ethics and/or applicable laws and regulations, the purpose of which is to correct and/or prevent behaviors that are detrimental to Prysmian.
- **Employee:** Individual with an employment contract with any Legal Entity of Prysmian. The definition includes any contracted temporary resources.
- **Ethics & Integrity Homepage:** The Ethics & Integrity Homepage is the Compliance homepage, available in the & Integrity Section of the [Corporate website](#) and in the correspondent Section of [Company's Intranet](#), accessible to employees. This site serves as a one-stop shop for Compliance Policies, communications, training materials, and the *Integrity First Helpline*.



- **Group Compliance:** Prysmian function responsible for overseeing and managing all compliance issues within the organization. This function develops programs to safeguard the Company by ensuring all Prysmian employees comply with regulatory requirements and internal policies and procedures. This function will provide guidance, training, advice, and support on all compliance topics and is aimed at being used as a resource for all Prysmian employees.
- **Helpline Committee:** is a cross-functional internal body composed by the Chief Risk & Compliance Officer, the VP Group Compliance, the Chief Audit Officer, the Chief Human Resources Officer, the Head of Legal Affairs and the Head of Industrial Relations and Employment Governance.
- **Incident Report:** The report includes the information provided by the reporter. The report is produced by the Prysmian Helpline Service Provider.
- **Integrity First Helpline:** Secured information system solution provided by the Prysmian Helpline Service Provider for the management and storage of the Incident Reports.
- **Investigation Report:** The investigation report includes the description and the results of the investigation performed by the Case Manager regarding an incident report.
- **Local Helpline Contact Point:** external consultant that, within the countries listed in Appendix D, has been authorized to operate a reporting channel and therefore to receive reports of potential breaches (either verbally, in writing or personally via a face-to-face meeting), offering appropriate guarantees of independence, confidentiality, data protection and secrecy and ensures the absence of language barriers.
- **Prysmian Helpline Service Provider:** External service provider independent from Prysmian which receives the complaint received through the *Integrity First Helpline*. The Prysmian Helpline Service Provider produces the Incident Reports and maintain the *Integrity First Helpline*.

- **Quarterly Helpline Report:** Report which includes a summary of the Incident reports received in the last quarter and the Investigation Reports proposed for dismissal by the Helpline Committee to the relevant Control Bodies, such as the Control and Risks Committee.
- **Question:** Any question about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian, including but not limited to the Prysmian Code of Ethics.
- **Reporter:** Employee or other authorized subject who reports to the *Integrity First Helpline* or any other available channel any concern or question.
- **Retaliation:** Occurs when an employer takes punitive actions that negatively impact an employee for acting lawfully and according to Company policies and procedures. Retaliation can include any form of negative action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment.
- **Review:** The analysis and investigation of the factual, legal and ethical basis of a question or concern, which may include interviews, review of documents and data, site visits and seeking external legal or other advice, as needed.
- **Significant Investigation:** is an investigation regarding a concern about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian, including but not limited to the Prysmian Code of Ethics involving the Prysmian CEO and/or any first report of the latter.

## ANNEX B – QUESTIONS & ANSWERS

*Question:* I was visiting one of our plants and saw what looked like a leak of toxic material. I mentioned it to the maintenance contractor who said it is always like that. That does not sound right to me. What should I do?

*Answer:* You should talk to your supervisor and follow up with the Health and Safety Function which oversees the plant you visited. Any potential environmental impact is important and is a threat to our reputation. The issue, where confirmed, should therefore be promptly resolved by the responsible Functions. This may be also a good example of what to do if you raise a concern and do not receive a satisfactory answer. Do not give up, raise it to the next level and you can always talk to your Regional Compliance Team, or raise a concern through the available channels.

*Question:* My Regional Compliance Team recently interviewed me as part of an investigation. My supervisor asked me why I was out of the office for two hours and whether there is anything going on that she should be aware of. What do I say?

*Answer:* You should tell your supervisor that you had a confidential meeting with the Regional Compliance Team. You cannot say anything further. If he/she presses you on it, ask him/her to contact the Regional Compliance Team directly.

*Question:* I am working on a new government contract and have a lot of questions relating to confidential information, gifts, international trade controls and other matters. Where do I start? What if there is no policy that answers my questions?

*Answer:* You should start by reviewing the Prysmian Code of Ethics and other relevant global policies, all of which are located on the Ethics & Integrity Homepage. Your business may also have Policies or procedures that apply just to people in your Business Unit or Region – these policies and/or procedures are not available on the Ethics & Integrity Homepage. Contact your Regional Compliance Team for more information and/or if you believe that a global policy should be developed in relation to a specific subject matter or modified.

## **ANNEX C – INTEGRITY FIRST HELPLINE PHONE NUMBERS**

### International dialing instructions:

1. First check to see if there are any dialing restrictions for your country.
2. The telephone you are using must have international dialing capability.
3. Look up your country in the chart below and find your access type and telephone number(s).
4. Follow the directions below to place a call based on the access type for your country.

### International Toll-free Service (ITFS) and Global International Service (GIS):

1. Dial your country/carrier-specific telephone number.
2. You will be given the option to make your report in English or your own language. You will hear a recorded message in your own language explaining the call process.
3. The first person who speaks to you will be an English-speaking interviewer. He or she will bring into the conference call a translator who speaks your language to assist you in reporting your concern. This may take a few minutes. Please be patient.

### World Wide Connect (WWC):

1. Dial your country-specific access code to reach AT&T.
2. When prompted\* enter the 8xx telephone number to connect to NAVEX Global.
3. You will be given the option to make your report in English or your own language. You will hear a recorded message in your own language explaining the call process.
4. The first person who speaks to you will be an English-speaking interviewer. He or she will bring into the conference call a translator who speaks your language to assist you in reporting your concern. This may take a few minutes. Please be patient.

\*This initial prompt could be either a voiceless tone, or a message in English. If the caller does not speak English they may wait on the line and an AT&T operator will help them connect to the 8xx number.

Country	Carrier	Service Type	Access Code	Restrictions*	Phone
Angola		WWC			8552141483
Argentina		ITFS		J	0800-444-1517
Australia		ITFS		M	1-800-48-2597
Austria		WWC	0-800-200-288	27, E	8552141483
Belgium		WWC	0-800-100-10	27, A	8552141483
Brazil		WWC	0-800-888-8288	27	8552141483
Brazil		WWC	0-800-890-0288	04	8552141483
Canada		Regular			8772705055
Canada		Regular			8552141483
Canada		Local			4702196731
Chile		WWC			8552141483
China		GIS Shared Cost		No restrictions	400-8-811-484
Colombia		WWC			8552141483
Costa Rica		WWC			8552141483
Czech Republic		ITFS		J, P	800-143-159
Denmark		WWC	800-100-10	27	8552141483
Ecuador		WWC			8552141483
Estonia		WWC	800-12001	04	8552141483
Finland		ITFS		G, M, H	0800-9-17732
France		ITFS		M	0800-90-4567
Germany		WWC	0-800-225-5288	27	8552141483
Honduras		WWC			8552141483

Hong Kong		ITFS		M	800-96-1023
Hungary		ITFS		A, M	06-800-21-119
India		WWC	000-117	13	8552141483
Indonesia		ITFS		F, L, 11	001-803-1-003-2517
Italy		ITFS		A, M	800-782078
Luxembourg		WWC	800-201-11	04, 17	8552141483
Malaysia		ITFS		No restrictions	1-800-81-7955
Mexico		ITFS		S, U, 11	001-855-214-1483
Netherlands		WWC	0800-022-9111	A	8552141483
New Zealand		GIS – One Step			0508-612-637
Norway		ITFS		M	800-13180
Oman		WWC			8552141483
Peru		WWC			8552141483
Philippines	Bayan	WWC	105-11	04, A	8552141483
Philippines	Digitel	WWC	105-11	A	8552141483
Philippines	Globe	WWC	105-11	A	8552141483
Philippines	Option 2	WWC	105-11	A	8552141483
Philippines	Philcom	WWC	105-11	A	8552141483
Philippines	PLDT	WWC	1010-5511-00	A	8552141483
Philippines	Smart	WWC	105-11	A	8552141483
Portugal		WWC			8552141483
Qatar		GIS International		No restrictions	800-0187
Romania	Romtelecom	WWC	0808-03-4288	04, 31, A	8552141483

Russia		WWC	8^10-800-110-1011	A, D	8552141483
Russia	Moscow	WWC	363-2400	No restrictions	8552141483
Russia	outside Moscow	WWC	8^495-363-2400	A, 22, D	8552141483
Russia	outside St. Petersburg	WWC	8^812-363-2400	A, 22, D	8552141483
Russia	St. Petersburg	WWC	363-2400	A, D	8552141483
Singapore		ITFS		M, P	800-110-2171
Slovak Republic		WWC	0-800-000-101	27, D	8552141483
Spain		WWC	900-99-0011	27	8552141483
Sweden		WWC	020-799-111	No restrictions	8552141483
Thailand		ITFS		03, P, 11, M	001-800-11-003-2517
Tunisia				M	+33 0800-90-4567
Tunisia			8000-555-66	No restrictions	+971 8552141483
Turkey		WWC	0811-288-0001	04, 12, A	8552141483
United Arab Emirates		WWC	8000-021	27, A	8552141483
United Arab Emirates		WWC	8000-555-66	No restrictions	8552141483
United Arab Emirates	Military-USO & cellular	WWC	8000-061	27	8552141483
United Kingdom		ITFS		F, M	0808-234-8817
United States		Regular			8772705055

United States		Regular			8552141483
United States		Local			4702196731
Vietnam	Viettel	WWC	1-228-0288	32	8552141483
Vietnam	VNPT	WWC	1-201-0288	29	8552141483

Restrictions

Service Type	Code	Description
ATTD	04	Not available from cellular phones
ATTD	12	Requires international access
ATTD	13	Only available from phones allowing international access and most public calling centers;may not be available from all locations;not available from public phones.
ATTD	17	Collect calling from public phones
ATTD	22	Add'l charges apply when calling outside Moscow, St. Petersburg
ATTD	27	Available from cellular phones
ATTD	29	VNPT phones (mobile and landlines including Vinaphone and Mobiphone)
ATTD	31	Available only from named carrier
ATTD	32	Vietel phone (mobile and landlines including Vietel Mobile)
ATTD	A	Public phones require coin or card deposit
ATTD	D	May not be available from every phone/public phone



ATTD	E	Public phones may require local coin payment during call duration
GIS	ITF22	Only available on an individual case basis.
International		
GIS	ITF25	Qatar has a monthly rental charge of \$50 charge per number.
International		
ITFS	03	Not available from public phones or all areas
ITFS	11	Phone must have international access
ITFS	A	Public phones require coin or card deposit
ITFS	E	Public phones require local coin payment through call duration
ITFS	F	Not available from payphones
ITFS	G	Available from payphones for ITFS but not for UIFN
ITFS	H	UIFN callers using mobile phones charged local charges
ITFS	J	Available from mobile phones for ITFS but not for UIFN. Airtime charges may apply.
ITFS	L	Limited availability from mobile phones. Airtime charges may apply.
ITFS	M	Available from mobile phones. Airtime charges may apply.
ITFS	P	Telephone Administration may restrict the use of toll-free numbers for certain applications such as resale, prepaid cards, calling cards, call-back purposes or third-country calling.
ITFS	S	A general per call surcharge may be assessed to the caller.
ITFS	U	May work from non-Carrier phones. Non-Carriers may treat calls as international long distance calls and not toll-free.

## ANNEX D – EU COMPETENT AUTHORITIES AND LOCAL HELPLINE CONTACT POINTS

N.	Country	Competent Authority	Local Helpline Contact Point
1	Austria	Federal Bureau of Anti-Corruption (BAK)	N/A
2	Belgium	Federal Ombudsmen	N/A
3	Bulgaria	Commission for Personal Data Protection	N/A
4	Croatia	The Ombudswoman	N/A
5	Cyprus		N/A
6	Czech Republic	Ministry of Justice	<a href="mailto:Helpline.Czechrepublic@prysmian.com">Helpline.Czechrepublic@prysmian.com</a>
7	Denmark	Datatilsynet	N/A
8	Estonia		N/A
9	Finland	Office of the Chancellor of Justice	<a href="mailto:Helpline.Finland@prysmian.com">Helpline.Finland@prysmian.com</a>
10	France	<ol style="list-style-type: none"> <li>1) Agence française anticorruption (AFA);</li> <li>2) Direction Générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF);</li> <li>3) Autorité de la concurrence;</li> <li>4) Autorité des marchés financiers (AMF);</li> <li>5) Commission nationale de l'informatique et des libertés (CNIL) for data protection and IT issues;</li> <li>6) Human Rights Defender;</li> <li>7) The judicial authority;</li> <li>8) An institution, body or agency of the EU competent to collect information on violations falling</li> </ol>	<a href="mailto:Helpline.France@prysmian.com">Helpline.France@prysmian.com</a>

		within the scope of the Whistleblowing Directive	
11	Germany	<ol style="list-style-type: none"> <li>1) Federal Office of Justice;</li> <li>2) Federal Financial Supervisory Authority;</li> <li>3) Federal Cartel Office</li> </ol>	<a href="mailto:Helpline.Germany@prysmian.com">Helpline.Germany@prysmian.com</a>
12	Greece	The National Transparency Authority	N/A
13	Hungary	<ol style="list-style-type: none"> <li>1) Competent department of the relevant county government office;</li> <li>2) The Hungarian National Bank;</li> <li>3) The Hungarian Competition Authority;</li> <li>4) The Commissioner for Fundamental Rights</li> </ol>	<a href="mailto:Helpline.Hungary@prysmian.com">Helpline.Hungary@prysmian.com</a>
14	Ireland	The Office of the Protected Disclosures Commissioner (OPDC).	N/A
15	Italy	Aurorit� Nazionale Anticorruzione (ANAC)	<a href="mailto:Helpline.Italy@prysmian.com">Helpline.Italy@prysmian.com</a>
16	Latvia	State Chancellery	N/A
17	Lithuania	The Public Prosecutor's Office	N/A
18	Luxembourg		N/A
19	Malta	Several authorities. For a full list, see the table in the First Schedule of the Act.	N/A
20	Poland		N/A
21	Portugal	<ol style="list-style-type: none"> <li>1) The National Anti-Corruption Mechanism;</li> <li>2) Public Prosecutor's Office;</li> <li>3) Criminal Police Bodies;</li> <li>4) Bank of Portugal;</li> <li>5) Other authorities or institutions</li> </ol>	<a href="mailto:Helpline.Portugal@prysmian.com">Helpline.Portugal@prysmian.com</a>
22	Romania	1) Financial Supervisory Authority (ASF);	<a href="mailto:Helpline.Romania@prysmian.com">Helpline.Romania@prysmian.com</a>

		2) National Bank of Romania (BNR); 3) Other authorities or institutions	
23	Slovakia	Whistleblower Protection Office	<a href="mailto:Helpline.Slovakia@prysmian.com">Helpline.Slovakia@prysmian.com</a>
24	Slovenia		N/A
25	Spain	Autoridad Independiente de protección del Informante (AIPI)	<a href="mailto:Helpline.Spain@prysmian.com">Helpline.Spain@prysmian.com</a>
26	Sweden	Swedish Work Environment Authority	N/A
27	The Netherlands	1) Consumer and Market Authority; 2) Financial Markets Authority; 3) Dutch Data Protection Authority; 4) De Nederlandsche Bank N.V.; 5) The House for Whistleblowers; 6) The Health and Youth Care Inspectorate; 7) The Dutch Healthcare Authority; 8) The Authority for Nuclear Safety and Radiation Protection; 9) Other authorities or institutions	<a href="mailto:Helpline.Netherlands@prysmian.com">Helpline.Netherlands@prysmian.com</a>

**ANNEX E – SUPERVISORY BOBIES PURSUANT TO DECREE 231 AND CONTACT DETAILS**

N.	Company	E-mail address
1	Prysmian S.p.A.	odv.prysmian@prysmian.com
2	Prysmian Treasury S.r.l.	odv.treasury@prysmian.com
3	Prysmian Powerlink S.r.l.	odv.powerlink@prysmian.com
4	Fibre Ottiche Sud S.r.l.	odv.fos@prysmian.com
5	Prysmian Cavi e Sistemi Italia S.r.l.	odv.prysmianitalia@prysmian.com
6	Prysmian Cavi e Sistemi S.r.l.	odv.cavisistemi@prysmian.com
7	Electronic and Optical Sensing Solutions S.r.l.	odv.electronics@prysmian.com