

HEALTH, SAFETY, ENVIRONMENT AND ENERGY POLICY

APPROVED BY

PRYSMIAN S.p.A BOARD OF DIRECTORS

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LEADERSHIP MESSAGE

*At Prysmian, we are steadfastly committed to the principles of our **Health, Safety, Environment and Energy Policy**.*

*As the world leader in cable systems for energy and telecom, our success is built on the protection of people and the environment. Our **HSEE Policy** is not just a document; it reflects our dedication to prevention, shared responsibility, and continuous improvement.*

*We prioritize identifying and managing risks to ensure safe and healthy workplaces, while protecting the environment wherever we operate. Every product, activity, and service we deliver is designed and executed in accordance with the highest standards of **health, safety, environmental protection, and regulatory compliance**.*

*Sustainability is at the core of our operations. We are committed to developing innovative solutions that reduce negative environmental impact, prevent accidents and occupational illnesses, and support our customers in achieving their **decarbonization and sustainability goals**.*

Our HSEE Policy provides a framework for setting and reviewing our HSEE objectives, aligning them with our strategic direction and fostering a strong culture of accountability, care, and excellence throughout the organization. By adhering to this policy, we aim to protect our people, safeguard the environment, improve operational resilience, and ensure sustainable growth, creating long-term value for all our stakeholders.

Thank you for your continued trust and support.

Massimo Battaini
Prysmian CEO

1. PURPOSE & OBJECTIVE

The purpose of this HSEE Policy is to reaffirm Prysmian's commitment to protecting the health, safety and wellbeing of all employees, and to safeguarding the environment in which Prysmian operates. Environmental protection includes positive climate action, biodiversity conservation, and supporting a circular economy. These commitments are essential prerequisites in pursuing our sustainability ambition and creating long-term value for internal and external stakeholders.

This policy supports the Group's strategic direction, **"Accelerating Growth"**, which is built on strengthening Prysmian's leadership in the energy and telecom sectors through innovation, operational excellence, and a fully integrated approach to sustainability. As part of this strategy, ESG considerations are embedded across the business model, guiding decision-making, investment choices, product development, and the management of risks and opportunities.

This policy is guided by Prysmian's core commitment to protecting the health and safety of its people across the Group's entire value chain.

Prysmian has set the goal of achieving **Net Zero by 2035**, an ambition supported by a decarbonization pathway that includes the reduction of Scope 1, Scope 2 (market- and location-based) and Scope 3 emissions. This pathway is enabled by investments in innovation, the development of solutions with a reduced environmental impact, the prioritization of recyclable materials, the reduction of resource consumption, and collaboration with business partners.

The Group is also committed to biodiversity conservation, with a **long-term Net Gain ambition by 2035**. This includes ensuring that 100% of new prioritized installations apply a Net Gain procedure and that all production sites located in biodiversity-relevant areas are covered by Biodiversity Action Plans (BAPs) by 2030. Prysmian also assesses supply-chain hotspots, engages suppliers to reduce negative impacts and dependencies, and develops systems to monitor biodiversity-related actions.

In parallel, Prysmian promotes a **circular economy** by increasing material efficiency, enhancing the use of recycled content in addressable materials such as copper, polyethylene, lead and steel. Circularity is further supported by the growth of sustainability-linked revenues and by continuous innovation in product design and material selection.

The objective of this policy is to **establish a clear framework for defining, implementing and reviewing HSEE goals**, ensuring continuous improvement in our processes, systems and performance. Through this framework, Prysmian fosters a culture of responsibility, excellence and accountability across the entire organization, further enabling the Group to deliver sustainable growth while protecting people and the planet.

2. POLICY OWNER

Prysmian Health Safety and Environment Function owns this policy and is responsible for periodically reviewing and updating it to ensure it accurately reflects the company's mission and long-term goals, organizational updates and/or legal and regulatory changes.

3. APPLICABILITY

This policy applies to all employees, interns, external consultants, officers, directors and administrators of all Prysmian's legal entities, as well as all people within its value chain, including contractors.

4. YOUR RESPONSIBILITY AS EMPLOYEE

All employees must be aware of the role they play in protecting people, life and the environment, as well as in maintaining and improving a healthy and safe workplace within our organization.

This policy requires you to:

- a) read, understand, and comply with the requirements deriving from this Policy;
- b) comply with Prysmian's Code of ethics and any other applicable policies or procedures;
- c) immediately report any alleged violation of this policy to the appropriate channels outlined in Section 6.1 of the [Helpline Policy](#), whether said violation is committed by a Prysmian employee or an external stakeholder;

- d) ask questions or report any concerns you may have related to this policy to the Prysmian compliance function;
- e) complete – when required – assigned training related to this policy.

5. POLICY REQUIREMENTS – RULES OF CONDUCT

Prysmian designs, develops, produces, supplies and installs a wide range of cables, accessories, systems and integrated solutions for multiple applications in the energy and telecommunication sectors. The Group also provides related services in full alignment with its vision, which promotes “the efficient, effective and sustainable supply of energy and information as the main driver for the development of communities.”

This policy applies to the entire Prysmian perimeter and is fully aligned with the Group's strategic direction, “Accelerating Growth”, which embeds sustainability and subset ESG topics into the Group's business model, operational execution, and long-term value creation. The policy is publicly available on the Group's website and is distributed to all Group companies through the intranet and HSEE Management Systems. It applies to all Company operations and employees, as well as to contractors, agency workers and any individual operating under the Company's supervision.

All Group companies are therefore committed to the following principles:

- *complying with applicable legal requirements and other commitments* to which the organization abides with regard to health, safety, the environment and energy; and implementing HSEE management systems in compliance with international standards, while addressing risks and identifying opportunities arising in the context of the organization and its activities;
- *conveying full and complete information about health, safety, the environment and energy*, in accordance with specific procedures and programs, engaging and consulting every level of the organization and everyone who works for the Group;
- *guaranteeing that responsibilities and resources are properly allocated*, and that operating procedures are precisely defined, communicated and supported through specific training;

- Furthermore, Prysmian *ensures that all its employees and any person/organization working under its control are informed* and, in case of specific tasks, authorized on the basis of appropriate education, training and experience, in addition to possessing certifications or licenses, where required, to perform their tasks without detrimental effects on the environment, health or safety.

♦ **Health & safety principles:**

- Identifying all hazards associated with its activities, assessing potential health and safety risks, and implementing appropriate preventive and protective measures to eliminate or reduce such risks. This includes the use of collective and personal protective equipment, as well as the management of technical, organizational and human factors that contribute to the promotion of a strong safety culture.
- Protecting and promoting a healthy, safe and respectful workplace environment by addressing physical and mental wellbeing, travel-related health and safety risks, and risks associated with inappropriate behavior or harassment.
- Establishing quantitative targets for continuously improving health and safety performance metrics, defining specific action plans and setting priorities.
- Guaranteeing our people and partners have access to water that is safe for consumption, sanitation and hygiene in every Prysmian worksite.

♦ **Environmental protection, energy management and circular economy principles:**

- Driving and ensuring continuous improvement in all production processes and related activities, adopting a lifecycle perspective to identify and evaluate environmental aspects that the organization can control or influence, while committing to transition the business toward Net Zero emissions in line with the 1.5°C ambition of the Paris Agreement.
- Optimizing the consumption of energy resources, including water and raw materials, and preventing pollution by identifying, monitoring and reducing the negative environmental impact of internal and external processes and products, adopting the necessary measures to pursue the Group's Net Zero targets.

- Encouraging a systematic approach to energy management through the identification of responsibilities and tasks with a view to continuously improving energy efficiency in Prysmian operations, also committing to transitioning to 100% renewable and low-carbon electricity, searching for innovative and technological solutions, designing and purchasing energy-efficient products and services to improve energy performance.
- Understanding the value of nature, ecosystems and biodiversity and the importance they have within the areas where Prysmian operates and along the value chain, with a commitment to identifying and assessing biodiversity related risks and applying a mitigation hierarchy approach (avoid, minimize, restore, offset) across all operations. The Group develops systems to monitor biodiversity-related actions, assesses supply-chain environmental hotspots, and engages suppliers to reduce impacts and dependencies, promoting innovation initiatives aimed at minimizing nature-related pressures.
- Contributing to the global commitment to helping end deforestation connected with Prysmian business through the definition of targets, programs and monitoring plans, while also engaging external stakeholders.
- Promoting a circular economy by reducing resource consumption, increasing material efficiency, and enhancing the use of recycled content in addressable materials. Prysmian advances circularity by increasing the share of recycled content in materials such as copper, polyethylene, lead and steel.
- Reducing waste generation across all operations by prioritizing waste prevention, reuse and recycling, and by promoting material efficiency throughout the value chain. The Group identifies and implements circular solutions, monitors waste-related negative impacts and drives continuous-improvement initiatives to support its broader circular-economy strategy and ensure the responsible use of materials.
- Not financing, directly or indirectly, initiatives, organizations, or activities nor lobbying actions aimed at hindering or weakening environmental and climate regulations.

In the event of mergers, acquisitions and/or joint ventures, this policy shall apply upon completion of the due diligence process and closure of the deal.

Prysmian is committed to the continuous improvement of its policies and programs. The Groups adopts procedures, rules and instructions to ensure that the values embodied in this

policy are reflected in the conduct of each Group company and in that of its employees and any person/organization working under Prysmian's control.

6. CONSEQUENCES OF POLICY VIOLATION

As a Prysmian employee, you are expected to uphold the highest standards of ethical conduct and integrity, in full alignment with the Group's Code of Ethics. Compliance with this Code and with the HSEE Policy is a fundamental responsibility of every employee.

Any breach or suspected non-compliance will be addressed in accordance with applicable local legislation and established disciplinary procedures. These measures are essential to safeguarding Prysmian's reputation, protecting its interests, and reinforcing a culture of accountability and trust across the organization.

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

8. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT

The owner of this policy is responsible for performing periodic reviews and updates of this document, in particular examining and evaluating revisions to be made based on internal organizational updates, changes to external legislation and/or best practices.

Additionally, Group Compliance Function and the Internal Audit Department may respectively perform, using a risk-based approach, monitoring or audit activities aimed at verifying the correct enforcement of this policy within the organization.

9. RELATED DOCUMENTS

The following documents are related to this policy and must be consulted by all Prysmian employees for further guidance. Part of these 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) Health, Safety and Environment Manual
- b) Enterprise Risk Management Policy