

PRYSMIAN GLOBAL ANTI - HARASSMENT POLICY

APPROVED BY
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LEADERSHIP MESSAGE

Prysmian is committed to the development of an organization that values talent, abilities, diverse experiences, different cultural backgrounds, and, in general all forms of diversity: ethnic, race, gender, language, age, sexual orientation, marital status, nationality, religion, political orientation, socio-economic status, physical and mental ability, experience, education and professional background.

In promoting such a diversified environment, Prysmian wants people to feel respected, appreciated, and free to fully express their human potential, which means qualifying belonging as one of the main pillars of the company culture. Accordingly, Prysmian has also adopted a Human Rights policy which supports internationally recognized human rights standards and regulates violations of those standards.

For all the reasons above, Prysmian's employees are encouraged to raise any concern about violations of the principles outlined in the Code of Ethics and the Human Rights policy.

In ensuring the respect of the previously mentioned principles, Prysmian is committed to regulate the anti-harassment procedures and to monitor the behavior of those who have been involved in harassment-related issues. Prysmian regulates these procedures through this Anti-harassment policy which is an Appendix of the Human Rights policy.

The Company is committed to support the adoption of the anti-harassment principles along its value chain and within the communities in which it is present, encouraging their adoption to all its suppliers.

Massimo Battaini
Prysmian CEO

1. PURPOSE & OBJECTIVE

The purpose of this Policy is to create a safe working environment, free from any type of discrimination, any sort of violence or harassment, either sexual or based on personal, cultural, and political diversity. Prysmian wants all the employees to be treated with dignity, respect and fairness, and exhibit conduct that reflects the values of the Group.

Additionally, Prysmian aims at building a responsible and sustainable value chain and, if any violation of the principles was to occur, the Group reserves the right to reconsider either the future of the commercial partnership with the involved business partners or to take appropriate action against their involved employees.

2. POLICY OWNER

HR Corporate 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. APPLICABILITY

This Policy applies to all employees, interns, external consultants, officers, directors and administrators of all legal entities of Prysmian.

Any specific requirements arising from applicable local laws shall be addressed through dedicated local documents and/or procedures.

4. YOUR RESPONSIBILITY AS EMPLOYEE

This Policy requires you to:

- a) Read, understand, and comply with the requirements included in this Policy;

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

5. POLICY REQUIREMENTS – RULES OF CONDUCT

5.1. Harassment

Harassment can occur in many different forms. It is any unwelcome and uninvited behavior which has no legitimate workplace function, and which intimidates, humiliates, or offends another person or a group of persons. Harassment may occur based on:

- Sex.
- Age.
- Marital status.
- Race, color, national origin, ancestry.
- Disability.
- Religion or belief.
- Sexual orientation.
- Gender identity or expression or gender reassignment.
- Domestic or civil partnership status.
- Alienage or citizenship.
- Military status, veteran status.
- Genetic predisposition.
- Pregnancy and maternity.
- Medical conditions.
- Status as a victim of domestic violence.
- Unemployment.
- Political preference.
- Any other category protected by law in the local jurisdiction.

In specific circumstances, harassment may include jokes, epithets, stereotypes, threats, intimidations, hostile acts, defamation, insults, aggression, derision, spreading of confidential and/or malicious information, offensive written materials and any other conduct aiming at denigrating an individual or group of people on one or more of the bases listed above.

Harassment can make a person feel offended, hurt, upset, humiliated, frightened, intimidated, anxious, frustrated, or afraid. It may occur through persistent aggression of physical, verbal, or psychological nature, such as:

- Persistent and negative attacks on a person's performance.

- Manipulation of an employee's image and reputation by spreading rumors and gossips about him/her/*.
- Offensive comments.
- Exclusion of a person from professional activities and opportunities

5.2. Sexual Harassment

Sexual harassment is any unwelcome sexual advance, request for sexual favors or other conduct of a sexual nature; it may take the form of a threat or an implication.

Types of behavior which can constitute sexual harassment include:

- Sexual or physical contact (e.g., kissing, patting, pinching, touching, hugging, grabbing, brushing).
- Staring or leering.
- Unwelcome comments or questions about a person's sexual activity, appearance, dress, or body.
- Unwelcome messages of a sexual nature sent both by paper and via electronic devices.
- Lewd comments, dirty jokes, foul language, sexual overtones.
- Offensive and suggestive body language.
- Displaying offensive images.
- Inappropriate and unwelcome content sent or posted via a social media site, including inappropriate advances or content of a sexual nature (e.g., pictures, posters, calendars, graffiti, objects, promotional material, reading material, photos).
- Explicit or implicit request for sexual favors accompanied by implied or open threats concerning the target's job performance evaluation, a promotion or other job benefits.
- Sexual assault (e.g., rape, sexual battery, molestation or attempt to commit these assaults).
- Hostile action against a person due his/her/* sexual orientation, gender, gender identity (e.g., destroying a person's workstation, interfering with a person's ability to perform the job, sabotaging someone else's work, bullying, yelling, name-calling).

5.3. Vilification

Vilification is a public act which incites, encourages, or urges others to hate or severely ridicule a person(s) because they are part of a particular group.

5.4. Bullying

Bullying is repeated unreasonable behavior towards another person that creates a risk to their mental or physical health and safety. The following are examples of bullying behavior:

- Victimization.
- Humiliation.
- Intimidation.
- Threatening someone.
- Spreading rumors about someone.
- Targeting a person via social media tools.
- Isolating a person from a work team.
- Psychological and/or physical abuse.

Bullying can result in a hostile work environment in which an offender continuously irritates, marginalizes, humiliates, or ostracizes a person.

On the contrary, reasonable management actions such as allocating work, setting deadlines, giving fair and constructive feedback, deciding not to award a promotion or benefit, or informing an employee about unsatisfactory performance, for example, do not constitute bullying.

5.5. Intimidation

Intimidation is unreasonable use of status or authority upon an individual requiring him/her/* to act in an inappropriate way or to do something which is not in line with the Group's policies.

6. 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.

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

Harassment is a serious violation and must be reported whenever there is suspicion or certainty that it is occurring. Addressing harassment concerns or allegations may be done either informally or formally as detailed below:

Informal Procedure

This process is based on the belief of the Prysmian that all Managers must always:

- Be ethical role models.
- Be available to listen to concerns/problems of Prysmian's employees and offer them guidance and support.
- Promote a positive working environment in which employees feel free to start a reporting process.
- Make sure that any corrective action taken is consistent with the Company's policies.

- Give their team members the necessary training to work safely and in compliance with the law.

This way of reporting encourages the reporter to consider taking the following steps:

- If he/she/* feels comfortable to do so, they may try to resolve the matter directly with the other party involved.
- If this is not possible, the issue should be referred to a supervisor who can manage the issue informally by speaking with all involved parties.

Formal Procedure

All employees can pursue a more formal process if they do not feel comfortable reporting through the informal procedure or feel the issue was not fully resolved through the informal procedure. The Prysmian has adopted the Helpline policy to outline ways in which concerns related to the violation or potential violation of the Prysmian Code of Ethics, or any other Company policy or procedure, can be reported¹. The Helpline policy provides a person, who needs to report an issue, the ability to contact the Integrity First Helpline center (by mail, telephone, or Internet) or, in the alternative, the Regional Compliance Leader, Legal or HR business partner. The information related to the issue reported, such as the identity of the people involved and the allegations or facts remain confidential; moreover, the Helpline Committee (charged with reviewing Helpline submissions) is impartial, and no repercussions are taken against those who submit a good-faith complaint or help others in submitting a good-faith complaint.

7.1. Support to Offended Employees

As written in the Helpline policy, after a report has been submitted to the Integrity First Helpline, the Helpline Committee begins investigating to determine if the allegations are substantiated or unsubstantiated. If the Committee substantiates the allegations corrective actions may be taken. Potential corrective actions are listed below:

- Coaching.
- Verbal reprimand.

¹ The Helpline provides employees with 3 reporting channels (web, email, phone) in 27 languages and is available 24 hours a day and 7 days a week. Please refer to www.prysmian.com/en/company/ethics-integrity/helpline for the reporting channel contact details.

- Suspension.
- Salary action.
- Demotion/transfer.
- Termination.
- Additional legal action.
- Follow up with the Offended Employee (closing the issue/case).

7.2. Anti Retaliation

Whether the report is substantiated or unsubstantiated, the Helpline Committee may establish a plan to monitor the situation and to avoid cases of retaliation. Disciplinary action may be taken against those who have acted in bad faith or have not been honest, truthful, or have impeded the investigation; disciplinary action taken under these circumstances is not retaliation.

The Group maintains Helpline reports to periodically analyze and interpret trend data with the goal of proactively improving communication and implementation of compliance updates to policies, procedures, and practices.

8. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT

The Owner of this Policy is responsible to perform periodic reviews and updates of this document, examining 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.

9. 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) *Helpline policy*