

PRYSMIAN GLOBAL RECRUITMENT POLICY

APPROVED BY
PRYSMIAN GROUP CEO
May 25th, 2026

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LEADERSHIP MESSAGE

Prysmian is committed to the development of an organization that values talent, abilities, diverse experiences, and different cultural backgrounds, where people feel respected, appreciated, and free to fully express their human potential. Prysmian strongly believes that diversity drives meritocracy and brings significant value to all levels of the organization, increases the possibility of capturing market opportunities and maximizing value for our customers and shareholders. Workplace belonging promotes mutual respect among employees, builds a strong culture and reputation internally and externally in the market and more broadly, increases creativity and productivity, and promotes compliance with local legal requirements. We want to constantly improve our performance and move our business forward. To reach this goal, we need to recruit from the widest possible pool of talent based on an uncompromising commitment to excellence and meritocracy.

Massimo Battaini

Prysmian CEO

1. PURPOSE & OBJECTIVE

The purpose of this Policy is to strengthen the recruitment process through the adoption of a standardized methodology that will promote the highest standards for our hiring activity. Our Recruitment Policy will also enable us to select the best talent on the market, by promoting the value of belonging at all levels of our organization.

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.

The stakeholders are Line Managers, Hiring Managers, HR Corporate and HR Regional/Local: they are responsible for ensuring that Individual uniqueness is respected during the recruiting process. These individuals are also responsible for guaranteeing that external providers, such as Head-Hunting firms and Recruitment Agencies, are aligned and follow our Recruitment Policy.

3. APPLICABILITY

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

Accordingly, these guidelines must be applied to all the recruiting activities of desk workers and, to the maximum possible, when recruiting non-desk workers, interns, and other contracts forms. In all cases, all Prysmian Companies must comply with all applicable law relating to diversity.

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

Prysmian is committed to ensuring equal pay for equal work or work of equal value. Recruitment and pay-setting decisions shall be based on objective, gender-neutral business requirements or criteria including but not limited to skills, responsibilities, experience and working conditions.

The specific principles of this policy are the following:

- Prysmian aims to attract and recruit individuals with diverse backgrounds, skills, and abilities, who will enhance the quality of service and contribute to Prysmian's success. We embrace belonging in all forms: ethnic, gender, language, age, sexual orientation, marital status, nationality, religion, socioeconomic status, physical and mental ability, experience, education, and professional background.
- Prysmian endeavors to extend equal opportunities and equal dignity to all types of diverse individuals.
- We see the variety of talents as a competitive advantage and a key success factor for Prysmian's future sustainable long-term growth.
- At the same time, we reinforce the importance of meritocracy: experiences, capabilities and competencies will drive the choice of the best candidates (applicable for hiring, promotion or during M&A processes). We must endeavor to remove any risk of arbitrary selection and base our decisions on previously agreed principles of fairness, with evaluations based on the type of position and with a focus on best practices and legal liabilities. Individuals should succeed or fail based on their efforts and skills and their alignment with applicable job requirements.
- Prysmian is committed to providing all current employees with opportunities for development and career growth. Prysmian will advertise position vacancies both internally and externally and fill positions based on established procedures that promote the variety of applications.

The specific purposes of this policy are the following:

- a. To reinforce the recruiting process by providing a standardized methodology, that will ensure equal opportunities in every step of selection. Our Online Assessment package that is available for the Group, incorporates these principles and is highly recommended to be used in all the hiring processes, whether they are conducted

directly or through third-party recruiting partners. We must always hire the best candidate for the job and strive to hire people with different and unique talents.

- b. To ensure that our marketing and advertising materials, job postings, website and annual report adhere to our Recruitment Policy principles and relevant employment legislation.
- c. To improve internal and external branding to attract and retain talent, diversify our employee population, and expand our talent pool.

5.1. Hiring Need and Job Requisitions Via Workday

For every hiring need, the organization must proceed as follows:

- a. When an established position becomes vacant or a new position is created, the Line Manager/Hiring Manager must complete the specific hiring form, called job requisition, via Workday and add a job description. The description will be reviewed by the HR team.
- b. The process is approved according to the function/business approval chain (supervisory organization)
- c. The HR responsible for the recruiting process defines the recruiting strategy and recruiting channels, including engaging local providers.
- d. The HR responsible reviews the applicable job description and activates and eventually shares the description with external providers.
- e. The HR responsible posts the position on our website on the career page and on the Prysmian Global LinkedIn page, corporate career page and internal job posting (if needed, considering the IJP policies).

Line Managers, Hiring Managers, HR Corporate and HR Regional/Local should carefully consider internal candidates before commencing a process to hire an external candidate and should commence an external search only if no current employee is eligible and available for the position, according to the guidelines of the Internal Job Posting process and talent management practices.

5.2. Job Description and Skill Specification

The job description is a key document in the recruitment process and must be finalized and agreed among stakeholders prior to taking any further steps.

Within the job description format, there are the following key components:

- Role section, covering the principal Reporting and Responsibilities, Hierarchical structure, Location, Function/Business Unit.
- Profile section, outlining the mandatory and desirable criteria (including education background, qualifications, professional certifications, experience, knowledge, skills, and level of expertise required to perform the job). Hiring Managers should endeavor to avoid any specific unconscious bias, HR plays a key role in helping management and staff understand the importance of accurate and inclusive Job Posting.

5.3. Advertising and Sourcing

Prysmian uses different sources and channels to generate interest in company positions, including Prysmian's career portal and primary social media page advertisements, Headhunters, agencies, newspapers, specialist journals, and online job boards (like universities).

All sources address diverse candidates. In particular:

- **Headhunter, Agency Agreements.** It is mandatory to include a Statement to guarantee a neutral recruiting process that will welcome all candidates with the right set of skills. All our suppliers must acknowledge and respect our Recruitment Policy before starting a candidate search.
- **Job posting.** Use inclusive language and highlight the variety in the company's talent brand images, descriptions of company culture, employee resource groups, and employee testimonials. Utilize generic descriptions, avoiding any exclusionary language.

In accordance with applicable local laws and regulations, the candidate shall be provided with the pay information for the position offered.

Throughout the recruitment process:

- candidates shall not be asked about their current or previous pay history.
- any information voluntarily disclosed by candidates regarding past pay shall not be used as a determining factor in pay-setting decisions.

All job descriptions, if not for confidential senior positions, are published on prysmian.com and Prysmian social media page for at least ten days before assigning a search to external agencies or Headhunter firms.

Internal and external recruiters must be trained in Prysmian's values. As recruiters, they are often the first point of contact for our candidates. They should familiarize themselves with this Global Recruitment Policy so that they can speak fluently with our candidates about it.

To promote the purposes and principles of our Global Recruitment Policy, the recruitment workflow is structured as follows:



5.4. Screening and Long List

The initial list of applicants (through Prysmian or an External Agency) **should be well balanced by taking into consideration different experiences and backgrounds and specific skills** .

Submitted curricula should not contain pictures, age, marital status, place of birth, or anything that could feed an unconscious bias.

The first list of candidates should reflect an appropriate balance of diverse candidates.

It is suggested that all candidates who reach the final step of the recruiting complete an online assessment, which includes an English test, and a Questionnaire. Questions included in the Questionnaire are designed to support the screening of candidates according to the specific behaviors Prysmian wants to develop in its organization. The online assessment is an internationally recognized scientific methodology that supports objective evaluations of a candidate's leadership style.

5.5. Short List Interviews and Selection

The results of the online assessment will provide support to guide the Hiring Managers and HR to complete the interview phase of our recruiting process. **HR and/or Headhunters should present a balanced list of candidates to the Line Managers for the interview phase.**

For the interviews, the panel should be composed of at least 3/4 interviewers (considering the role to be recruited for) and it should include managers from diverse backgrounds.

Recruiters and interviewers must feel empowered to present diverse candidate slates. Everyone should be provided with the *Behavioral Interview Tool*, which assesses how candidates will behave in the future based on prior experiences. By using a behavioral interview technique, managers will minimize the risk of self-replication and will have an objective measure against which to compare other candidates. The Behavioral Interview Tool guidelines is consistent with Prysmian's official Leadership Model, and it is available to the HR teams.

5.6. Appointing New Employees

HR will normally extend a job offer directly or via the recruitment agency. Upon acceptance of the offer, HR will liaise with candidates and confirm the appointment once the formalities have been completed (i.e., satisfactory references from last two employers, work health assessment, confirmation of educational and/or qualification, and confirmation of local working rights). These requirements should be completed before the new employee joins the company. HR must approve any exceptions in advance of formal appointment.

Any employment offer shall be based on objective, gender-neutral business requirements or criteria including but not limited to skills, responsibilities, experience and working conditions.

At the end of the process, HR is responsible for providing proper and respectful feedback to unsuccessful candidates. Each candidate's experience is important. HR must thank him/her for his/her interest in Prysmian and invite him/her to apply again for future job openings. A Survey is also sent to all candidates regarding the recruiting process, to measure the effectiveness of the selection process and the consistency with the Global recruiting policy. Such questionnaire includes also specific questions about the quality of information provided by the recruiter on the role and its contractual conditions.

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.

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.

Given the above principles and the importance Prysmian devotes to build an organization based on belonging, our Internal Audit and Compliance Team will monitor its implementation. For any open position, the HR Department must identify why the company selected a particular candidate. The HR Department may allow a limited exception to the procedures set forth in this policy only in specific circumstances where the HR Department determines that an exception is warranted to meet a business need.

Twice per year, at Group, Region, Country and BU level, the company will publish a specific report regarding the status of the recruiting activity.

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.