Policy for Managing Dialogue with Shareholders and Other Stakeholders

APPROVED BY

PRYSMIAN S.p.A BOARD OF DIRECTORS

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The planet's pathways

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LEADERSHIP MESSAGE

Prysmian’s sustainability strategy is based on an extended, integrated, and systemic vision of the value chain. Prysmian uses a structured approach that combines innovation, collaboration, and digitalization, and leverages the active contributions of all internal and external stakeholders.
In this context, ongoing dialogue with investors, shareholders, suppliers, customers, employees, local communities, and other stakeholders represents a strategic driver for growth and a key channel for developing shared solutions. Engagement activities aim to:

- *gather suggestions for the innovation of processes, products and communication channels;*
- *map and understand the impacts generated and incurred by the Group, in order to manage risks and reputation more effectively;*
- *inform, educate and engage all stakeholders on material topics for the Group and the areas in which it operates;*
- *identify needs, expectations and issues to be reflected in the sustainability strategy, building relationships based on trust and transparency.*

Prysmian’s people are at the heart of this process: through training initiatives, dialogue and direct involvement, they actively contribute to creating more sustainable, innovative and inclusive solutions.

Massimo Battaini
Prysmian CEO

1. PURPOSE & OBJECTIVE

The purpose of this policy is to ensure that:

- Prysmian promotes dialogue with its stakeholders, including shareholders and other institutional investors, in order to ensure adequate information is provided, acquire opinions and proposals, and generally to maintain an adequate channel of communication with these parties.
- The Prysmian Board of Directors has approved the policy for management of dialogue with stakeholders based on recommendations from the Corporate Governance Code to which the company adheres, and the engagement policies adopted by institutional investors and asset managers, among other elements.
- The policy applies to dialogue outside of shareholders' meetings with stakeholders on matters managed by the board, and specifically including:
    - corporate strategy;
    - prospects and economic-financial dynamics;
    - corporate governance (appointment and composition of corporate bodies, including their dimensions, professional expertise, independence and diversity);
    - ESG matters;
    - remuneration policy;
    - internal control system;
    - risk management system.

The following are therefore outside the scope of the policy:

- information provided and discussions with shareholders regarding, and in the context of, shareholders' meetings;
- exchanges between stakeholders and corporate structures regarding clarifications or technical information that do not involve the Board or the executive directors.

The engagement process is structured in accordance with the latest version (2015) of the AA1000SES international standard, developed by AccountAbility. The approach is implemented through a series of both formal and informal physical and digital instruments and channels, capable of harnessing contributions from each actor in the value chain.

2. POLICY OWNER

The IR 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.

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) Immediately report any alleged violation of this policy, whether committed by a Prysmian employee or by an external stakeholder, to the appropriate channels outlined in Section 6 of the **Helpline Policy**;
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 Duties

(a) This article defines the duties of the corporate bodies and of certain corporate structures in relation to dialogue with stakeholders, which are based on the underlying assumption that the Board of Directors delegates management of this area to the CEO, while the management body continues, in any case, to guide and monitor; and the Board of Directors, in any case, holds the power to make decisions with reference to specific cases.

(b) In exercising the powers assigned, the CEO coordinates with, and is supported by, the Chairman, the CSO, the CFO and the IR function.

Stakeholders are divided into two main groups:

- affected stakeholders: individuals or groups whose interests are affected or could be affected – positively or negatively – by the undertaking's activities and direct and indirect business relationships across its value chain;
- users of sustainability statements: primary users of general purpose financial reporting (existing and potential investors, lenders and other creditors including asset managers, credit institutions, insurance undertakings), as well as other users, including the undertaking's business partners, trade unions and social partners, civil society and non-governmental organizations, governments, analysts and academics.

5.1.1 Board of Directors

a) The Board of Directors is the body responsible for dialogue with stakeholders and delegates management of said dialogue, with an operational scope, to the CEO. The Board of Directors maintains a role of guidance, supervision and monitoring of the application of the policy and, in general, of the development of dialogue with stakeholders and observance of the law in relation to such activity.

b) With the disclosure provided pursuant to Art. 5.1.2 (a) to the Board of Directors, the latter verifies that dialogue with stakeholders is:

  - promoted, together with an informed exercise of rights by shareholders more generally;

- performed in the interests of the company, regarding in particular a medium/long-term view and sustainable development of the group;
- performed in compliance with the law and with principles of transparency, truthfulness and proportionality.

c) In general, the Board of Directors delegates management of dialogue with stakeholders to the CEO, though the Board of Directors may at any time exercise the power to make a decision on any matter regarding this dialogue. In particular, assessment by the Board of Directors may be appropriate with reference to situations or matters of particular significance or that are particularly problematic.

d) The Board of Directors may also delegate, in each case, other directors to participate, or in any case to perform associated activities, in specific dialogues with stakeholders, assigning them the relevant powers in each instance.

e) The Board of Directors monitors application of the policy and relevant changes to the law and best practices, in order to evaluate any necessary changes to the policy itself.

5.1.2 Chairman

a) In the context of his/her powers and responsibilities, pursuant to the law and the recommendations of the code, regarding the management of board activities, the Chairman ensures that the Board of Directors is informed, by the first available meeting, on the developments and significant contents of any dialogue with stakeholders, coordinating with the CEO and CSO for this purpose

b) The Chairman may participate in dialogue with stakeholders, depending on the matter to be discussed or on specific stakeholder requests.

c) The Chairman shall be promptly notified by directors if they receive requests for a meeting with or for information from stakeholders, for the purposes of application of the provisions specified in paragraph 5.2.2 (d).

d) The Chairman is responsible for preparing proposals for changes to the policy, to be submitted to the Board of Directors.

5.1.3 CEO

a) The CEO manages dialogue with stakeholders from an operational perspective, coordinating with the Chairman where applicable, dealing among other things with the following:

- evaluation, with the support of the CSO and Investor Relations function, of a stakeholder's request to establish a dialogue with the company, on the basis of the best interests of the latter and establishing whether this request may be accepted or should be refused, providing instructions to the IR function for referral of the decision to the stakeholder. For the purposes of his/her evaluation, the CEO may, for example, consider the following:

  (1) the significance that the dialogue may have for other stakeholders as well,

  (2) the characteristics and dimensions of the investment of the investors who are requesting to establish a dialogue,

  (3) the reasons stated by the stakeholder making the request and the existence of potential conflicts of interests,

  (4) recommendations from the proxy advisor, and voting or engagement policies of asset managers or the outcome of previous shareholder's meeting votes,

  (5) the significance of dialogue in the context of generating value in the medium- to long-term.

  In any case, the CEO may decide to have the Board of Directors evaluate a stakeholder request, or other specific considerations regarding dialogue with a stakeholder (e.g. in the presence of particular circumstances or problems),

- decision to take actions aimed at permitting or supporting dialogue with stakeholders (also pursuant to the article 5.2.1 below), with support of the CSO, the IR Function and the CFO regarding organization and definition of contents,
- definition, having consulted the Chairman and with the support of the CSO and the IR Function, of the methods through which dialogue with stakeholders takes place, taking care that these are aligned with the

company's interests, in terms, for example, of the choice between meetings in person or the use of communication tools; the number of meetings to hold; and the number of participants,

- examination of the requests for information from stakeholders and coordination, supported by the CSO and Investor Relations function, of information-gathering from relevant corporate structures that are functional to stakeholder dialogue,
- identification, having consulted the Chairman, of company participants in dialogue with the stakeholders, choosing between: the directors, the CSO and other managers or employees who possess the most suitable knowledge and/or capabilities for providing information relevant to dialogue with the stakeholders,
- coordination with the Chairman, supported by the CSO and/or Investor Relations function, concerning the information and updates to provide to the Board of Directors regarding dialogue with the stakeholders;

b) In the context of board meetings, the CEO provides the Board of Directors and the Board of Statutory Auditors with updates on significant developments in the dialogue with stakeholders, as well as clarifications or additional information that, during board meetings, may be requested in order to monitor said dialogue.

5.1.4 CSO and IR Function

a) The CSO and IR Function support the CEO in managing dialogue with stakeholders from a strategic and operational perspective in the following ways:

- regarding the CSO, through definition of information to provide to stakeholders and organization of initiatives aimed at establishing or promoting dialogue with stakeholders, as well as any participation in meetings with stakeholders,
- regarding the IR Function, receiving requests from stakeholders to establish a dialogue with the company; communication with the stakeholders; definition of information to provide to the stakeholders; proposal, coordination and organization of initiatives aimed at establishing or promoting dialogue with the stakeholders (also

pursuant to article 5.2.1 below); and preparation of reports or other documentation required to inform the Board of Directors. The Investor Relations function also represents the first point of contact with stakeholders. Having received the requests from stakeholders, the IR Function identifies appropriate response methods and coordinates their implementation.

b) In performance of their duties, the CSO and IR Function coordinate, as needed, with other functions and/or company heads.

5.2 Methods of dialogue

5.2.1 Company disclosure to stakeholders

In addition to the reports and information that the company must publish by law, the company may implement one or more of the following activities in order to promote informed choices by its stakeholders:

a) presentation via streaming/webcast or conference call regarding economic/financial results for the period or other significant events for the Group;
b) publication of videos or transcripts of the events described under points (a) on the company website;
c) sending and/or publishing on the company website, videos or other communications, in any format, to give periodic updates on Group activities;
d) participation in industry meetings or other events that may allow the sharing of information with customers and other categories of stakeholders.

Additionally, the following dedicated activities are conducted specifically for investors:

e) roadshows, investor days or other meetings with one or more shareholders and/or investors (in addition to the shareholders' meeting required by law);
f) for the shareholders' meeting, preparing participation methods that permit access by and interaction with the largest possible number of shareholders, in keeping with applicable laws.

5.2.2 Contacting the company

a) For each shareholders' meeting, the company informs the public about ways that shareholders can submit questions and receive answers, or submit proposals to the shareholders' meeting, in compliance with law.

b) The company may be contacted through the Investor Relations function regarding engagement activities, and more generally regarding stewardship. The Investor Relations function then informs the CSO and consequently the CEO, taking into account the following elements, which must be specified by the stakeholder:

   (i) the topics to be discussed in the context of the dialogue,

   (ii) the reasons behind the request for the dialogue,

   (iii) the proposed methods for the dialogue,

   (iv) the stakeholder representatives who intend to participate in the dialogue.

c) The CEO, with the support of the CSO and the Investor Relations function, evaluates whether the dialogue requested is in the company's interests from a medium/long-term perspective and in terms of sustainable Group development, and whether it can be performed in compliance with the law, therefore adopting every relative measure considered necessary or appropriate. For the performance of these assessments, stakeholders may be requested to specify the reasons and purposes of the request for dialogue, including for a simple request for information, as well as to provide general clarifications regarding their activities.

d) If a director receives a request for a meeting or for information from stakeholders, he/she is required to promptly inform the CSO or Investor Relations function, who will inform the CEO or Chairman, in order to implement the measures described in the previous paragraphs (b) and (c), and the policy in general. This also applies in the event that a director is requested, by a stakeholder or other bodies or individuals, to participate in events as a speaker. Such participation must be authorized by the CEO.

5.3 Type of dialogue and disclosure to the public

a) Given that the CEO in any case performs a case-by-case assessment, supported by the CSO and based on the company's best interests, during which he or she considers, among other elements, the nature and significance of the matters in question and the stakeholder's characteristics, in the event there is a request for a meeting or information, preference is for a meeting held in person, in the presence of at least the CEO and/or the Chairman and the CSO/Investor Relations function and/or CFO. The only information to be provided orally (where appropriate with the support of presentations) is information strictly connected with the topics that prompted the stakeholders to request a dialogue in the first place.

b) The CEO assesses whether to publicly disclose:
   (i) information provided by stakeholders during a dialogue, or;
   (ii) stakeholder requests to establish a dialogue.

5.4 Topics and contents of dialogue with and disclosure to stakeholders

a) Disclosure of information to stakeholders, among other shareholders, must take place in accordance with the law, with particular regard to prohibition of selective communication of price-sensitive information. The company also carefully avoids disseminating significant information (that may become price sensitive) or information that must be considered confidential due to its nature or due to contractual obligations, including information which may compromise the company's interests if distributed.

b) In order to observe all obligations regarding the company's dissemination or communication of information, the company may perform all necessary or opportune activities, including:
   (i) publication of press releases,
   (ii) requests to any stakeholder to sign confidentiality agreements,
   (iii) implement legal measures to protect its interests,

c) Stakeholders are responsible for any use of information received from the company that represents a violation of a legal obligation or that is damaging to the interests of the Group or of third parties.

d) Information disclosed by the company is proportional to and suitable for the interests of the Group and the stakeholders, as well as being accurate and coherent with information already published by the company.

6. ADDITIONAL STAKEHOLDER ENGAGEMENT FRAMEWORKS

Engaging proactively and transparently with other stakeholders – other than shareholders and/or investors – is a core element of Prysmian's sustainability approach. Prysmian adopts a structured model that ensures continuous dialogue, active listening and collaboration, enabling the integration of stakeholder expectations into strategic decisions and long-term value creation. The table below outlines the main engagement channels used with each stakeholder group and clarifies the strategic purpose of these interactions, in line with Prysmian's ESG governance framework.

Stakeholder	Engagement methods	Purpose of engagement
Customers	▪ Field visits by technical and commercial teams; ▪ Customer satisfaction surveys and interviews to gather insights; ▪ User data analysis via integrated sensors and software; ▪ Cable apps and customer portal.	Listen to and work with customers to offer tailor-made solutions and drive sustainable innovation. The CRM system centralizes interactions and segments the market, facilitating increasingly sustainability-based offerings.
Schools, universities and research centers	▪ Prysmian Academy; ▪ Local student mentoring programs.	Invest and promote learning and training as key drivers of improvement and innovation, facilitating the development of innovative ideas that result in actual products.
Local communities	▪ Local training activities; ▪ Donations; ▪ Sponsorships.	Promote and contribute to the social and economic development of the communities in which the Group operates.
Employees and contractors	▪ Town Hall meetings; ▪ Open office days.	Create and foster a work environment based on diversity, inclusion and equal opportunity, in which merit plays a central role.
Suppliers	▪ Sustainability audits; ▪ Supplier conferences;	Promote supply chain sustainability by embedding environmental and social factors into

	▪ Digital assessments; ▪ Long-term partnerships	the supplier selection processes and monitoring suppliers, incentivizing circularity practices and helping to achieve Scope 3 targets.
Trade bodies, public organizations	▪ Dialogue with institutions and industry experts	Play an active role in international forums as an industry leader and trend-setter in the sector.

7. CONSEQUENCES OF A POLICY VIOLATION

As a Prysmian employee, you agree 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 interests and reputation of Prysmian, in accordance with applicable laws.

8. 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
c) the other designated subjects mentioned in the **Helpline Policy**.

Any form of retaliation, including threats and/or attempts at retaliation, is strictly prohibited. Prysmian is committed to ensuring that all employees are free 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 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.

9. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT

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

On a periodic basis and applying a risk-based approach, the Group Compliance Function and the Internal Audit Department may perform monitoring or audit activities aimed at verifying this policy's correct enforcement within the organization.

10. RELATED DOCUMENTS

The following documents are related to this policy and must be consulted by all Prysmian employees for further guidance. Parts 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) Code of Ethics;
b) Annual Integrated Report;
c) Report on Corporate Governance and ownership structure.

APPENDIX A – DEFINITIONS

- "Shareholders' Meeting": refers to the shareholders' meeting of the company.
- "Board of Directors": refers to the company's management board.
- "Chairman": refers to the Chairman of the company's Board of Directors.
- "CEO": refers to the company's Chief Executive Officer, i.e. the primary role in management of the company.
- "CSO": refers to the Group Chief Strategy, Investor Relations, M&A and Communication Officer as identified in each instance in the organizational chart of the Prysmian and who is generally responsible for Sustainability Reporting, IR, Communication, M&A and Strategy functions, among other aspects.
- "CFO": refers to the Group Chief Financial Officer as identified in each instance in the organizational chart of Prysmian and who is generally responsible for Administrative and Financial Reporting, Control and Management, and Finance, IT, and Tax functions, among other aspects.
- "CRCO": refers to the Group Chief Risk and Compliance Officer, who is responsible for ensuring that the main risks affecting Prysmian and its subsidiaries are promptly identified, assessed, managed and monitored over time. Moreover, he or she manages all compliance-related matters and policies.
- "Corporate Governance Code" or "Code": refers to the most recent version of the Corporate Governance Code approved by the Corporate Governance Committee established by Borsa Italiana S.p.A. and other industry associations.
- "Investor Relations (IR) Function": refers to the structure and office responsible for investor relations activity within Prysmian, under the structure of the CSO.
- "Prysmian" or "the company": refers to Prysmian S.p.A.
- "Group": refers to the company and its subsidiaries as included within the scope of consolidated reporting.
- "Law": indicates any legal or regulatory provision, whether national or international, consolidated case-law guidelines, communication, recommendation or other pronouncement of Consob or the European Securities and Markets Authority (ESMA), applicable in a particular instance in relation to the matters and activities dealt with by the policy, including but not limited to those regarding market abuse (including, in

particular, those regarding the passing on of price-sensitive information), confidentiality of certain information regarding the company and pre-arranged joint transactions.

- "Policy": refers to this policy for management of dialogue with stakeholders.
- "Industry Association": refers to the associations which stakeholders are members of.
- "Stakeholders": refers to those who can affect or be affected by the company.

APPENDIX B – PRYSMIAN STAKEHOLDER CATEGORIES