

DONATIONS PROCEDURE

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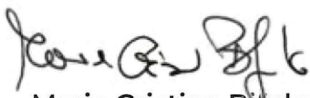
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1. PURPOSE & OBJECTIVE

As stated in its Sustainability Policy, Prysmian contributes to the socio-economic development of the communities in which it operates, aware of the effects that its business can generate on the countries and economies in which it carries out its activities. Accordingly, the Group has decided to adopt a policy to govern all measures instrumental to satisfying the needs of the communities and civil society, in line with its mission, values, Code of Ethics and policies.

The objective of this Procedure is to define common rules that are shared within all Prysmian companies in order to identify donations and the related approval procedures. The aforementioned activities are an integral part of the Sustainability Plan defined by the Group in order to identify priorities, goals and tangible actions that contribute to pursuing the targets set out in Prysmian's Sustainability Scorecard.

2. DEFINITIONS AND CLASSIFICATIONS

Prysmian has elected to adopt the guidelines set forth by Business for Social Impact (B4SI)¹ about the definition of "Corporate Community Investment" (CCI):

"Companies engage in activities that can have a positive impact on society every day. [...] Over and above these activities, companies often contribute to community-based organizations and engage in activities to help address a range of wider issues and causes in the communities where they do business. [...] This specific voluntary engagement with charitable organizations or activities that extends beyond companies' core business activities is broadly what is meant by corporate community investment."

In 2021 Prysmian published its Social Ambition program, committing itself to improve the performances in these areas:

- diversity
- equality and inclusion
- digital inclusion

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- **empowerment of communities**
- **employee engagement and upskilling**

Prysmian is proactively developing as an organization which recognizes the need for **diversity, inclusion**, and **gender equality** at all levels, and is committed to empowering more girls/**women** to pursue careers with Prysmian in technical and scientific roles, especially supporting underprivileged communities. The donations projects supported by Prysmian must be impactful for the poorer communities they are meant to address. These projects should also be focused on young, talented girls, to accompany them throughout, and to completion, their scholastic career. In general terms, Prysmian's initiatives in support of communities include:

- **long-term initiatives benefiting the community:** initiatives that aim to mitigate socio-environmental problems within underprivileged communities such as participation
- **donations:** contributions to third parties (organizations, non-profit entities, or private individuals) and short-term humanitarian and cultural initiatives which aim to create added value in ethical, civil and moral terms

As regards to Sponsorships (i.e., any payment in favor of third parties for displaying the brand and/or promoting the image of the Group, with the aim of increasing its reputation and prestige and creating value for its shareholders, including social and sporting initiatives), reference should be made to the **Prysmian's Sponsorships Procedure**.

Prysmian recognizes the three main types of contributions as indicated below:

- **cash contributions:** costs incurred by the Group to contribute to projects or initiatives developed by the communities in which it operates
- **labor time:** a cost for the Group that indirectly helps support social aims through the hours paid to employees involved in charity activities. This item does not include the time spent by employees on supporting social activities outside working hours and the business environment
- **donations in kind:** donation of products, equipment, or other tools, free or temporary advertising space in a publication or on the website that the Company makes available to charity organizations or associations. These contributions must be included and valued using estimates since they represent a cost incurred by the organization (these costs refer to the cost actually incurred by the company and not to market value)

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3. GUIDING PRINCIPLES

The choice of which supporting activities to implement meets specifically defined criteria designed to improve the process and avoid requests that are not in line with the Group's mission, vision, values, Code of Ethics, strategic guidelines, policies put in place and the Organizational Model pursuant to Legislative Decree No. 231/2001.

What may be funded:

- o **educational and youth support:** this category includes contributions to schools, universities, and educational establishments in underprivileged communities, or to any organization working for young people and their educational objectives, which requires financial support they cannot otherwise meet
- o **health and prevention:** this category includes all activities that support hospitals and health and prevention in general, in addition to initiatives supporting scientific and medical research and school-based training on topics regarding the activities carried out by Group companies
- o **economic development:** support to activities that promote economic development and entrepreneurship in the areas where the Group operates
- o **environment:** initiatives to protect the environment and raise awareness about topics such as climate change, energy savings, waste recycling and pollution. This category does not include the costs incurred by the Group in the ordinary management of the environmental impact of its business activities
- o **community and social welfare:** supporting associations working on social issues and initiatives designed to assist people who are disadvantaged or in difficulty
- o **emergencies:** contributions and support for populations who have suffered harm because of natural disasters, war, etc.

What may not be funded:

- o activities that are in any way illegal, dangerous, or harmful to the Group and its reputation
- o activities in conflict with the Group's mission, vision, Code of Ethics, strategic guidelines, policies put in place and the Organizational Model pursuant to Legislative Decree No. 231/2001

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The Group also prohibits:

- o paying or promising sums of money, guaranteeing or promising to guarantee goods in kind or other benefits to third parties, such as, for example, customers, suppliers, Public Administration Bodies, public institutions, or other organizations with the aim of promoting or favoring the Group's interests
- o resorting to other forms of aid or contributions which, in the guise of donations, appointments, consultancy or advertising, have the same purpose as those prohibited above

4. OPERATING PROCEDURES

Considering the above-mentioned guidelines, of the Group's Code of Ethics and of its principles of conduct, Prysmian has defined and formalized a procedure to assess donation beneficiaries, approving and monitoring donations and identifying the thresholds above which it is necessary to complete a strict approval process.

4.1 CASH DONATIONS AND DONATIONS IN KIND

Anti-corruption due diligence

The operating procedure requires first and foremost that any donation beneficiary accept to comply with and observe the principles of ethical conduct that the Group has adopted. Therefore, before proceeding with any donations above €1,000, an anti-corruption due diligence of the potential beneficiary must be carried out. Due diligence is performed using a dedicated online platform, in accordance with the provisions of the Third-Party Program, the ISO 37001 Standard and the Group's Anti-Bribery Management System. If due diligence has a positive outcome, the donation approval process can continue; if due diligence has a negative outcome, the approval process shall be suspended.

Approval process

In accordance with the provisions of paragraph "Definitions and Classifications" of this Policy, all donations described herein refer to cash contributions or contributions in kind made on behalf of the Company and not in a personal capacity.

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Regardless of the monetary value, a donation request shall be made by the requesting party who is required to open a ticket in “Service Now” [Business - Prysmian Service Portal | Prysmian Servicedesk \(service-now.com\)](#) that will launch a series of internal approvals, depending on the value of the donation itself.

- for donations from €0 to €10,000, the Service Now ticket shall be **approved by the Regional CEO**. The Group's Sustainability, Compliance and Tax Functions will receive the ticket for information purposes only
- for donations from €10,001 to €50,000, the Service Now ticket shall be **approved by the Regional CEO and the Group Chief Sustainability Officer**. The Group's Compliance and Tax Functions will receive the ticket for information purposes only
- for donations exceeding €50,001, the Service Now ticket shall be **approved by the Regional CEO and by all the Donations Committee members**. The Group's Tax Function will receive the Service Now ticket for information purposes only. This Policy does not cover contributions made to employees for reasons arising from the employment relationship or to any relatives in case of death; in these cases, the HR Department of reference must be directly informed, as it is directly responsible for them.

4.2 EMPLOYEES' LABOR-TIME DONATIONS – CORPORATE VOLUNTEERING

In accordance with the provisions of paragraph “Definitions and Classifications” of this Policy, all labor-time donations described herein refer to the working hours paid to employees involved in charity activities.

The request for any labor-time donation shall be made by the requesting party (representative of the Function or HR/Wellbeing Manager) by opening a ticket from Service Now [Business - Prysmian Service Portal | Prysmian Servicedesk \(service-now.com\)](#) and indicating the main information on the volunteering initiatives and the number of employees involved.

The Service Now ticket shall be approved by the Region HR Director and the Region HSE Director.

The Sustainability and Compliance Functions will receive the Service Now ticket for information purposes only. Each individual employee participating in a volunteering initiative shall be authorized in advance by his/her

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manager and shall validate this initiative within the time management systems, in accordance with the procedure in place at the Company.

5. DONATIONS COMMITTEE

The Donations Committee is responsible for examining donations, including the beneficiary's mission and the operating context, which must be in line with Prysmian's principles and values. The Donations Committee will meet at least once a year to monitor all donations made by the Group, regardless of their value.

The Committee is made up of the following Group representatives:

- Chief Sustainability Officer
- Chief Human Resources Officer
- Chief Risk & Compliance Officer
- Chief Financial Officer

6. CONSEQUENCES OF PROCEDURE VIOLATION

Prysmian employees who do not comply with this Procedure 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 PROCEDURE VIOLATION

As a Prysmian employee, you are required to report any Procedure violation to:

- [the Integrity First Helpline](#); or
- your Regional Compliance Team or the other designated subjects mentioned in Section 6.1 of the [Helpline Policy](#).

Any form of retaliation against reporters, 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

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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 Procedure 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. Using a risk-based approach, on a periodical basis the Group Compliance and Internal Audit Functions may perform, respectively, monitoring or audit activities aimed at verifying the correct enforcement of this Procedure within the organization.

9. FOLLOW UP COMMUNICATIONS

The Group's Sustainability Function monitors all donations, also with reference to the level achieved for the sustainability goals set. It also undertakes to disclose these activities, using tools such as its Sustainability Report/Consolidated Disclosure of Non-financial Information and/or the Group's website.

10. RELATED DOCUMENTS

The following Documents are related to this Procedure 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) Sponsorship Procedure
- c) Third Party Program Procedure