

CONFLICT MINERALS POLICY

APPROVED BY
PRYMIAN S.p.A. BOARD OF DIRECTORS
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LEADERSHIP MESSAGE

Prysmian seeks to ensure that suppliers also respect Human Rights, applying a specific Due Diligence process that assesses the risk at supply chain level. We carefully analyze the risks associated with suppliers and raw materials, apply ethical standards and policies on such topics as Human Rights and conflict minerals, and adopt a responsible code of business conduct. Prysmian informs suppliers about these standards and policies during its scouting and qualification stages. Prysmian carries out audits with the aim of monitoring the supplier base in order to prevent any violation, and if necessary, firmly take action — including reconsidering future commercial partnership with the involved suppliers.

Massimo Battaini
Prysmian CEO

1. PURPOSE & OBJECTIVE

The purpose of this Conflict Minerals Policy is to actively promote commercial practices that ensure a responsible and sustainable supply chain of so-called Conflict Minerals (as below detailed) as to meet the highest ethical, economic, environmental, and social standards throughout the company and the value chain.

This Policy is based upon the standards set by our “Code of Ethics” and “Code of Business Conduct” and the applicable laws and regulations, including – but not limited to:

- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- EU Conflict Minerals Regulation 2017/821.
- OECD Due Diligence Guidance for Responsible Business Conduct.
- The UN Guiding Principles on Business and Human Rights.

Prysmian further defines the procurement verifications and compliance of the so-called “Conflict minerals”.

“Conflict Minerals” (also known as ‘3TG’) are defined as Tin, Tungsten, Tantalum and Gold originating from the Democratic Republic of Congo (“DRC”), and the 10 surrounding countries. Armed rebels in that region have overtaken different aspects of the mining and materials export process and are using proceeds from the sale of these minerals to finance their rebellions. In 2012, the United States Securities and Exchange Commission issued its final rules regarding “Conflict Minerals” as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

In 2017 European Union has introduced a specific regulation requiring, among the others, direct importers of 3TG into the European Union to conduct due diligence if they are sourcing from conflict-affected and high-risk areas (EU Conflict Minerals Regulation 2017/821).

2. POLICY OWNER

Group Purchasing 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 Policy is approved by the Board.

3. APPLICABILITY

All actors in the value chain, including employees, interns, external consultants, officers, directors and administrators of all legal entities of Prysmian, are required to observe this Policy.

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) Complete assigned training related to this Policy when required.
- d) Ask questions or report any concerns related to this Policy;
- e) 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;

5. POLICY REQUIREMENTS – RULES OF CONDUCT

Prysmian strives to have, and to offer to its customers, a Conflict-Free Supply Chain.

The Group requires that its business partners are aware of – and compliant with the Conflict Minerals Policy.

Requirements:

- monitor sourcing trends within suppliers and towards a free, secure and conflict-free mineral trading environment through the following steps:
- identify material and/or semifinished products sourced that contain 3TG;
- collect from all our suppliers the origin of Conflict Minerals used in their process according to general international standards;
- analyze the data received and implement corrective actions if necessary.

The process needs to be carried out following the steps described in the relevant Operating Instruction (OI-PUR-BM-002 - "Operating Instruction on Conflict Minerals"). Suppliers' awareness and attention to our Conflict Minerals Policy will increasingly affect Prysmian sourcing decisions.

6. CONSEQUENCES OF POLICY VIOLATION

As an actor in Prysmian's value chain, including employees, interns, external consultants, officers, directors and administrators of all legal entities of Prysmian, 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 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, in particular, 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) Code of Business Conduct;
- c) OI-PUR-BM-002 - "Operating Instruction on Conflict Minerals"