

CODE OF BUSINESS CONDUCT

APPROVED BY

PRYSMIAN S.p.A. BOARD OF DIRECTORS

July 30, 2025



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1. INTRODUCTION

Prysmian is committed to responsibly implementing a business model that identifies sustainability as a key element in every decision. Our ethical framework ensures transparency, integrity, and accountability in all our operations.

Prysmian's business is conducted in accordance with the highest standards of ethical behavior, as outlined in Prysmian's [Code of Ethics](#) and in compliance with all applicable laws and regulations, avoiding any illegal or unethical conduct. Moreover, we based all of our activities on the best Environment, Social and Governance ("ESG") standards, aiming at being an enabler of economy decarbonization and energy transition through renewable sources.

Prysmian promotes responsible business practices in order to fulfill ethical, economic, environmental and social principles along its value chain, actively engaging with stakeholders, including suppliers, customers, and communities, to foster a culture of sustainability and shared value. For this reason, Prysmian issued this Code of Business Conduct (hereinafter also referred to collectively as the "Code") as a guideline for a responsible and sustainable supply chain.

This Code covers areas such as human rights, labor standards, environmental protection, and anti-corruption measures. By adhering to these principles, we build long-term relationships based on trust and mutual respect.

2. PURPOSE AND SCOPE

The principles mentioned in this Code apply to the employees of all Prysmian entities and their suppliers, trade partners, commercial agents, subcontractors, distributors (hereinafter also the "Covered Parties") in their business operations and daily activities, particularly with regard to deal-making and purchasing processes. Prysmian requires its Covered Parties to share its commitments.

Prysmian requires the Covered Parties to acknowledge and implement the standards and uphold the principles outlined in this Code, with reference to the following key areas:



- Business Integrity;
- Human and Labor Rights;
- Environment.

Covered Parties are expected to take appropriate actions against any of their workers that violate the standards expressed in this Code. Covered Parties shall promptly inform their Prysmian contact, or a member of Prysmian management when any situation develops that causes the business partner to operate in violation of this Code. Should any violations of the principles outlined in this Code emerge, Prysmian reserves the right to reconsider the continuity and development of the commercial relationships with the involved business partners. Furthermore, in its commercial relationships Prysmian assesses vendors and awards business taking into consideration the extent to which its business partners share and practice the values and principles outlined in this Code.

3. BUSINESS INTEGRITY

Prysmian operates with the conviction that ethics in the conduct of business activities must be pursued at the same time and with equal emphasis as the economic success of the business. Furthermore Prysmian promotes the development of durable relations with suppliers and business partners, through a mutual approach based on lawfulness, transparency, honesty and collaboration, as commonly accepted principles of business ethics. Covered Parties shall be open, honest, and transparent in all discussions and conduct business interactions and activities with integrity and trust.

3.1. Bribery and corruption

Prysmian does not tolerate any form of illegal or inappropriate activity, including corruption, extortion, embezzlement, or bribery – even if only tempted or suspected and regardless of the country in which the Covered Party provides services or products for Prysmian, with both government and the private sector representatives. Prysmian operates with transparency, fairness and integrity, looking at corruption not only as a crime, but also as a threat to the business activities, an obstacle for sustainability and a risk to business's reputation.



Covered Parties must not engage in any conduct—whether directly or indirectly—that involves offering, promising, giving, requesting, or accepting a bribe or any other undue or improper advantage to or from a public official, supplier, customer, competitor, or any third party, with the intent to influence or corrupt. For this reason, donations, gifts, offers, benefits and business opportunities not in line with these principles are strictly forbidden.

Similarly, Prysmian expects Covered Parties to maintain policies, processes and procedures to ensure these behaviors do not occur and are reasonably detected, if so.

3.2. Conflict of interest

A conflict of interest may impede making decisions and performing one's own duties objectively and impartially, obscuring and interfering with Prysmian's interest in a legitimate exercise of business activity. Such conflicts can arise in various forms, including but not limited to, situations where personal, financial, or family interests might compromise the integrity of decision-making processes. Covered Parties should avoid conflict of interest (and any appearance of a conflict of interest) whenever possible, with particular regard to personal, financial or family considerations, which might influence (or appear to influence) the decision maker's independence of judgment.

To maintain transparency and trust, ensuring fair and impartial decision making, Covered Parties must immediately disclose any known family or personal relationship with Prysmian employees or who may influence their engagement with Prysmian or have any involvement in business dealings with the supplier or business partner and Prysmian. Such disclosures should be made promptly to ensure that any potential conflicts are addressed and managed appropriately.

3.3. Gifts, meals and entertainment

Covered Parties shall use good judgement when exchanging business courtesies. In line with Prysmian's [Anticorruption Policy](#) the Covered Parties should offer or accept only entertainment that is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship and in occasions where business is discussed. The Covered Parties should not accept or offer gifts, meals, or



entertainment if such behavior could create the impression of improperly influencing the respective business relationship. Gifts, meals, entertainment, hospitality, and trips that are lavish or lack transparency or a legitimate purpose may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making. It is never permissible to give currency as a gift.

Giving business courtesies to Prysmian employees should be modest, infrequent and occur in the normal course of business. Do not offer/accept anything of value to obtain or retain a benefit or advantage for the giver, and do not offer/accept anything that might appear to influence, compromise judgment, or obligate the Prysmian employee.

3.4. Fair competition

The Covered Parties should conduct their business lawfully and with integrity, and properly handle competitive data, proprietary information and other intellectual property. They must protect sensitive information, such as trade secrets and confidential data, from unauthorized access or disclosure.

They should also comply with the legal requirements of the countries where they operate, with particular regard to fair competition, antitrust, and accurate and truthful marketing and advertising. We expressly forbid any business practice that may hinder, alter or distort fair competition within the market, including activities such as price-fixing, bid-rigging and unauthorized sharing of competitively sensitive information.

Therefore, Covered Parties are required to commit themselves to behaving at all times in good faith and in accordance with the principles of mutuality and maximization of value, refraining from undertaking any act, omission, or behavior that could lead to a violation – committed or attempted – of competition rules.

3.5. Export Controls and economic sanctions

Prysmian adheres to export control laws that regulate cross-border transfer of good, software and technology, as well as to economic sanctions that can be comprehensive and targeted, as political trade restrictions. These regulations are crucial for maintaining



international security and compliance with global trade standards, allowing the promotion of a culture of integrity and responsibility throughout its global operations.

In line with Prysmian's strong commitment to export control compliance and economic sanctions enforcement, Covered Parties should uphold the same high standards. This includes conducting robust screening of counterparties and their ownership structure as well as actively preventing the diversion of products for circumvention purposes. If requested, accurate and complete information regarding the final destination and end use of the products must be provided.

Covered Parties are required to respect all applicable laws on export and import controls tied to transactions, sales of assets, software, technologies, and provision of services, including transactions and financial intermediation activities. Providing of accurate and complete product descriptions when classifying goods is required.

3.6. Privacy

At Prysmian, we are committed to value and protect digital rights and privacy of all Covered Parties, ensuring that personal data are uniquely handled for specific, explicit and legitimate purposes.

Prysmian expects Covered Parties to comply with all local privacy and data protection laws, have appropriate processes and practices to secure and protect Personal data, use Personal data only as agreed to by Prysmian representatives or Prysmian's customers, and cooperate with Prysmian compliance efforts.

3.7. Accounting and business records

Covered Parties should maintain accurate and transparent books, records and accounts to demonstrate compliance with all applicable laws, regulations and contractual obligations. All records, including financial documents, communications, and internal business information, must be retained, stored, and disposed of responsibly and securely. In order to ensure transparency, fairness and clarity, the Covered Parties must never, under any circumstances, accept or make irregular or unregistered payments, nor engage in



inaccurate, false or misleading record keeping, even if one might reasonably believe the consequences of the inaccuracy would be harmless.

Business Partners must implement appropriate safeguards to protect confidential and proprietary information and to ensure transparency, accountability, traceability and compliance in all recordkeeping practices.

4. HUMAN AND LABOR RIGHTS

Prysmian has a strong commitment in respecting, safeguarding and promoting universal human and labor rights and principles.

Covered Parties should ensure strict compliance with all applicable laws and regulations in the countries where they operate, also by promoting and upholding the highest standard of diversity and inclusion, fair labor and wages, equal opportunities for all employees, and a safe and healthy workplace.

We expect Covered Parties to implement robust policies and procedures to prevent any form of violation of human and labor rights within their operations and supply chain, as well as conducting regular audits and assessment to ensure compliance with the applicable standards.

By adhering to the following principles, the Covered Parties demonstrate their commitment to upholding human dignity and promoting ethical labor practices. Prysmian not only monitors the respect of the provisions included in this Code, but also reserves the right to carry out audits aimed at identifying potential human rights violations and – if they were to arise – take prompt actions.

4.1. Child and Forced labor

Prysmian supports and expects the commitment of the Covered Parties to the elimination of child labor and all forms of slavery, human trafficking and forced or compulsory labor. International Labour Organization's (ILO) Conventions and the United Nations Convention on the Rights of the Child provide the framework for national laws to prescribe a minimum



age for employment or work and to protect the child from any abuse. Child labor shall not be used under any circumstance. Covered Parties shall not employ anyone under the legal minimum working age for employment, and suppliers shall implement an appropriate mechanism to verify the age of workers. By fostering a culture of responsibility and vigilance, the Covered Parties can contribute to the global effort to protect children's rights and promote ethical labor standards.

Covered Parties must reject and report any use of forced labor, including, as outlined by the ILO Forced Labor Convention, transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. All work must be voluntary, and workers should be free to leave work at any time or terminate their employment, without facing any penalties.

4.2. Occupational health and safety

Prysmian's first priority is the safeguarding of health, safety and integrity of the workforce, both in terms of physical and psychological perspectives.

Covered Parties must have a clear commitment in occupational health and safety. They should assess and take account of possible effects of activities, products and services on the health of the employees and take measures to prevent accidents and injuries in projecting sites, vessels and plants, eliminating insecure and dangerous conditions immediately. We expect Covered Parties to comply with the relevant safety laws, regulations, international standards and best practices, especially in the field of health and safety at work. Covered Parties must also prohibit the use, possession, distribution, or sale of drugs and alcohol in the working place, according to the applicable regulation.

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained personal protective equipment. Procedures and systems are to be put in place to prevent, manage, track and report



occupational injury and illness. Furthermore, worker exposure to the hazard of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks, is to be identified, evaluated and controlled.

4.3. Non-discrimination

Prysmian secures the dignity of each individual and adopt an inclusive approach, supporting the uniqueness of each person and believes that diversity represents a source of enrichment and innovation. Therefore, Prysmian supports the principles of equal opportunities and equal treatment outlined by the ILO Discrimination Convention, and the implementation of internal regulations created for this purpose.

The workforce should be free of harassment, unlawful discrimination, and retaliation, both physical and verbal. There is no room for any form of harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment.

Covered Parties shall provide equal opportunity in the workplace and reasonable accommodation, and not infringe on voting rights or political participation, engage in harassment or discrimination in employment on the basis of age, ancestry, ethnic origin, caste, citizenship, color, family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, minority status, pay, medical condition, national origin, physical or mental disability, political affiliation, union membership, , race, religion, sex (including pregnancy), sexual orientation, or any other characteristic protected by applicable local laws and regulations.

4.4. Working hours, wages and benefits

Prysmian firmly promotes equal opportunities in every level of its organization, ensuring a fair remuneration for all the employees in compliance with applicable laws and regulations, including the ones regarding minimum wage, working overtime and compulsory benefits, adhering to the principle of social and economic equity.



Covered Parties should promote fair labor conditions and make sure that working hours, including overtime, do not exceed applicable local legal limits. Covered Parties should respect local wage regulations and/or collective agreements, and where these do not exist, compensate employees so that they can at least afford to meet their basic needs or in line with local industry standard, whichever is higher. Compensation paid to workers should comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. It is expected that the basis on which workers are paid is provided in a timely manner via pay stub or similar documentation.

4.5. Freedom of association and collective bargaining

Prysmian recognize the value of collective bargaining as a crucial tool to determine contract terms for our employees and the regulation of relations with trade unions.

Covered Parties should guarantee the rights of workers to associate freely, join or not join labor unions, seek representation and join workers' councils, as well as the right of collective bargaining in accordance with local laws. Workers should be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. The Covered Parties should neither favor nor discriminate against members of employee organizations or trade unions. They should, instead, foster communication and direct engagement between workers and management, which are the most effective ways to resolve workplace and compensation issues.

5. ENVIRONMENT

Prysmian's environmental strategy is based on the responsible usage of resources and the safeguarding of future generations' needs, and is committed to limit its negative impact on the environment due to manufacturing operations and related unavoidable emissions, resource consumption and logistics and operations. Our priority is to preserve environmental integrity and its biodiversity in every phase of the business.



In a large number of solutions, however, Prysmian's technology makes an important contribution to improving energy efficiency, effectively reducing resource consumption and environmental pollution. In the same way, business partners should recognize and integrate environmental responsibility into their business strategy, establishing appropriate organizational structures and procedures for the effective management of environmental risks and minimizing the impact on environment and natural resources in their operations. Prysmian requires the Covered Parties to be aligned to the principles reported in this section and comply with all applicable environmental laws and regulations, including those that mandate Environmental, Social and Governance (ESG) related reporting and/or regulate hazardous materials, air, and water emissions, noise pollution, waste, and land degradation.

Particularly, our suppliers are required to adhere to our principles regarding responsible usage of resources and environmental safeguarding, as well as not pursuing any initiative that may harm environment, local communities, biodiversity and the natural ecosystem of the territories where they operate, acting decisively in the fight against climate change.

5.1. Precautionary Principle

Prysmian adheres and requires the Covered Parties to adopt and respect the Precautionary Principle upon which "where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing cost-effective measures to prevent environmental degradation" (United Nations Declaration, The Rio Declaration on Environment and Development, 1992).

By adhering to the Precautionary Principle, Prysmian and the Covered Parties demonstrate their commitment to environmental stewardship and their responsibility to protect the planet for future generations.

To effectively implement this principle, Covered Parties are asked to regularly evaluate potential environmental risks associated with their operations and take proactive steps to mitigate these risks, adopting effective measures to prevent environmental degradation also by investing in sustainable technologies and practices.



5.2. Use and compliance of raw materials

Prysmian promotes the responsible sourcing of materials used for its products. The management of raw materials is deemed important by Prysmian, considering the high consumption of valuable metals (such as copper and aluminum) as an essential part of the production process. Materials used by the Covered Parties are to be reduced, when possible, by practices such as production modification and technological improvements, maintenance and facility processes, materials substitution, conservation, recycling and reusing of materials. Chemicals and other materials posing a hazard if released to the environment are to be identified and managed by the Covered Parties, in order to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

As stated in our [Conflict Minerals Policy](#), Prysmian is committed, and requires its suppliers as well, to ensuring that the potential purchasing of minerals coming from high-risk or conflict affected countries (i.e. tin, tungsten, tantalum and gold, known as "Conflict Minerals") is not linked to organizations that directly or indirectly finance or benefit armed groups. If necessary, Covered Parties must exercise due diligence to investigate the source of such minerals.

Furthermore, the Covered Parties should comply with regulatory requirements regarding the prohibition and restriction of substances and ensure that goods provided are in compliance with requirements covered under the scope of all relevant regulations. If necessary, the Covered Parties should also implement a policy regarding conflict minerals and exercise due diligence to investigate their source.

5.3. Energy use, greenhouse gas and other emissions

We stand on the frontline in the fight for positive climate action and, in accordance to the Paris Agreement, we contribute to decarbonization of our production efforts.

Covered Parties – particularly our suppliers – play a key role in enabling us to achieve our environmental goals and must be committed to a responsible use of energy and energy-saving strategies such as the use of renewable sources. Covered Parties should also respect all applicable laws and regulations at international level related to greenhouse gas



emissions. Furthermore, emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals generated from operations are to be monitored, controlled and treated as required. Upon request, business partners shall disclose complete, consistent and accurate scope 1, 2, and 3 greenhouse gas (GHG) emissions data and/or components required to calculate GHG emissions data.

5.4. Water use, waste treatment and recycling

Water consumption is significant for Prysmian, given the large volumes needed in the various production cycles along the value chain. The Covered Parties must be committed to a responsible use of water and water-saving strategies. Wastewater and solid waste generated from operations, industrial processes and sanitation facilities should also be characterized, monitored, controlled and treated as required prior to discharge or disposal. Recycling and the use of recycled materials in production, together with life cycle analyses/assessments should also be considered by the Covered Parties in order to find the best environmental solutions throughout the value chain.

6. END TO END SUSTAINABLE SUPPLY CHAIN

Prysmian requires its suppliers to comply with applicable regulations during the executions of any activities in the name and/or on behalf of Prysmian.

We encourage our suppliers to develop and share sustainability best practices through their entire supply chain, with the aim of empowering the awareness of the importance of the ESG factors in all business relationships, guaranteeing the utmost transparency and reliability towards their own supply chain. Prysmian is, moreover, targeting to evaluate future business collaborations preferring the suppliers that have developed Sustainability Procurement Policies within their own Supply Chain Operations in order to regulate and publicly disclose their commitment on the main sustainability aspects such as Human Rights, Conflict Minerals, Code of Business Conducts and Code of Ethics.

Prysmian reserves the right to review or audit Covered Parties compliance with this Code. Covered Parties are to promptly respond to requests for information from Prysmian, or a



third party working on our behalf, regarding matters covered by this Code. These may include surveys, questionnaires, requests for supporting documentation and other measures intended to increase visibility into our supply chain.

7. RAISING CONCERNS AND REPORTING QUESTIONABLE BEHAVIOR

Prysmian encourages an open reporting culture. To report questionable behavior or a possible violation – even suspected – of the Code, or any other relevant Prysmian policy, procedure or applicable law and regulation, Covered Parties are encouraged to work with their primary Prysmian contact in resolving their concern. If that is not possible or appropriate, Covered Parties shall raise a concern through one of the reporting channels identified in Prysmian's Helpline Procedure, as better detailed below.

Prysmian has implemented a dedicated and secure Group reporting channel, known as IF Helpline, available 24 hours a day, 7 days a week, in all of Prysmian's languages, and offers several means allowing any company employee and/or Covered Party to report a concern or ask a question through:

- a) E-mail: Helpline@prysmian.com;
- b) Internet: www.prysmiangroup.ethicspoint.com;
- c) Telephone: refer to Prysmian [Helpline Policy](#) Appendix C for country-specific phone numbers.

Furthermore, Covered Parties may raise a concern by reaching out to the competent, on a Regional basis, Prysmian Regional Compliance Team or the Internal Audit Function, as well as referring to the other reporting channels defined by Prysmian Helpline Policy, publicly available at this [link](#).

Prysmian will maintain confidentiality to the extent possible and required by law and is committed to investigating any reports received with the utmost confidentiality and prohibits any retaliatory behavior against whomever has raised a concern on reasonable grounds.