

SUSTAINABILITY POLICY

APPROVED BY
PRYSMIAN S.p.A BOARD OF DIRECTORS
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CEO MESSAGE

Prysmian, global leader in energy and telecommunications cable systems sector, embraces its responsibility to develop and strengthen sustainable business practices. In line with the company's Vision - aimed at promoting "efficiency, effectiveness, and sustainability in the supply of energy and information as the main driver for community development" - Prysmian has integrated the concept of sustainability into its business model. Operating according to a philosophy based on the principles of Innovation, Passion, and Teamplay, Prysmian has over time consolidated its commitment in the economic, environmental, and social fields, aiming to create value for its stakeholders and contribute to sustainable development. Sustainability plays a central role in the Group's strategies and development goals. Prysmian is a global industrial company operating in the manufacturing sector with numerous production facilities and installation vessels around the world. Throughout the entire value chain and within its production processes, Prysmian takes care of people's health and safety, and protects the environment, promoting a more sustainable development of local communities and our industries. The sustainability vision is consolidated through four macro-areas of responsibility: Business Integrity, Product Responsibility, Social Responsibility, and Environmental Responsibility.

Massimo Battaini

Prysmian CEO

1. PURPOSE & OBJECTIVE

The purpose of this Policy is to ensure that the Group's Employees and all actors in the value chain who work continuously with the company are aware and act accordingly to Prysmian's approach to Sustainability and how it is integrated into the business strategy.

2. POLICY OWNER

The Group Sustainability Function is responsible for this Policy and is tasked with reviewing and updating it every 3 years to ensure it accurately reflects applicable regulations, best practices and business developments, also of an organizational nature. The Policy is approved by the Board of Directors.

3. APPLICABILITY

This Policy applies to all Prysmian employees, officers, executives, directors, interns; of all Prysmian companies, wherever located, as well as all actors in the value chain, who are required to observe principles set forth in this document.

4. EMPLOYEE OBLIGATIONS

This Policy requires that the Employee:

- a) reads, understands, and complies with the requirements outlined in this Policy
- b) complies with the Code of Ethics and applicable Prysmian policies, procedure or internal regulation (see Clause 9)
- c) asks questions or reports any concerns related to this Policy
- d) immediately reports to the relevant Regional Compliance Team or to Prysmian's Integrity First Helpline any violation even only potential, or suspected, of this Policy committed either by a Prysmian Employee or by a third party working on behalf of the Company.

5. POLICY REQUIREMENTS

5.1. BUSINESS INTEGRITY & RESPONSIBILITY

Prysmian is committed to conducting its Business in a fair, ethical and economically-viable way, based on a system of values that guides individual conduct both inside and outside the organization, through adherence to our Code of Ethics and Commercial Conduct Code.

5.2. PRODUCT RESPONSIBILITY

Prysmian is committed to continuously developing and improving its products in terms of innovation, technology, safety, and quality. Modern, reliable, efficient, and low environmental impact electricity and telecommunications networks are critical and strategic elements for global economic and social growth.

5.3. SOCIAL RESPONSIBILITY

Prysmian is committed to protecting social values within its operations to generate sustainable and lasting value. People are the most important resource for creating the skills needed to achieve business success. Our vision of social responsibility is comprehensive and includes aspects such as the defense of human rights, employee development and well-being, the creation of a responsible supply chain and corporate citizenship, as well as philanthropic initiatives that benefit communities and generate a positive, lasting, and measurable impact on people. Prysmian's strong commitment in all these areas is reflected in the Group's specific Policies and Procedures (in particular: Human Rights, Helpline, Diversity and Inclusion Policies and Donations Procedure).

5.4. ENVIRONMENTAL RESPONSIBILITY

Prysmian is committed to environmental protection and the conservation of natural resources. Our responsibility concerns both the intrinsic characteristics of our products and solutions, our production, processes, and our installation systems. In particular, the Group is active in preventing and reducing its environmental impact through its climate ambition, biodiversity protection, efficient use of natural resources, and responsible waste and water management. The HSEE Policy (Health, Safety, Environment, and Energy), Management Procedures, and the Group's Technical Standards have been adopted and applied at the operational unit level.

5.5. SUSTAINABILITY GOVERNANCE

With the goal of continuously improving the sustainability of its business activities and the transparency of related communications to stakeholders, Prysmian defined a Governance model that clarifies the roles and responsibilities of all actors:

- ✓ **The Chief Sustainability Officer and the Sustainability Function** are responsible for:
 - leading the creation of the ESG Strategy, defining targets, and setting priorities by identifying and monitoring the Group's material impacts, risks, and opportunities
 - supporting Regions and Business Units in implementing actions and initiatives aimed at achieving the Group's sustainability goals
 - managing sustainability indices
 - ensuring the execution of stakeholder engagement activities
 - leading the internal Sustainability Committee and the Local Sustainability Ambassador Network
 - acting as Secretary of the Board Sustainability Committee
 - supporting the Administration Department, Finance and Control in the preparation of the Integrated Report
- ✓ **The Group Planning and Control Function, and the Group Administration Function**, under the responsibility of the executives in charge of preparing corporate accounting documents, are responsible for:
 - Monitoring ESG KPI performance
 - Coordinating the collection of non-financial quantitative data
 - Drafting the Integrated Report
 - Verifying the accuracy and quality of the data

- ✓ **The Communications Function** is responsible for:
 - Developing communication campaigns focused on Sustainability topics
 - Collaborating with the Sustainability Function to organize stakeholder engagement events
- ✓ **The Sustainability Committee, composed of three non-executive and independent directors**, is generally tasked with overseeing sustainability matters related to business operations and stakeholder interactions. Specifically, it is responsible for the following responsibilities:
 - promoting a strategic direction to be submitted to the Board of Directors that integrates sustainability into business processes to ensure the creation of long-term sustainable value for shareholders and all other stakeholders
 - promoting a culture of sustainability among employees, shareholders, customers, and stakeholders in general
 - assessing the environmental, economic, and social impacts of business activities
 - providing opinions on annual and multi-year sustainability objectives, particularly regarding the identification, measurement, management, and monitoring of medium- and long-term risks related to the Company and its subsidiaries
 - monitoring the Company's positioning in major sustainability indices
 - providing opinions on initiatives and programs promoted by the Company or its subsidiaries concerning Corporate Social Responsibility (CSR)
 - reviewing the Sustainability Report, prepared by the relevant company functions, in advance of the Board of Directors
 - upon request from the Board of Directors, issuing opinions and proposals on specific Sustainability related matters
- ✓ **The Local Sustainability Ambassador Network** was established to promote a culture of sustainability and ESG initiatives and actions at both local and global levels across regions, through a cascading model.
- ✓ **Chief Risk & Compliance Officer** (see 5.8)

5.6. SUSTAINABILITY STRATEGY

Prysmian is committed to operating responsibly through a business model that identifies sustainability as a key driver of corporate decision-making and value. The Group's medium- and long-term strategy is based on the shared principles expressed in its Vision and Mission. Prysmian's sustainability journey is characterized by a 360° approach built on solid foundations. The Group develops its sustainability goals and related activities by drawing inspiration from identified materiality topics, the expectations of stakeholders - duly identified

and analyzed - and from the United Nations Sustainable Development Goals (SDGs). By building and nurturing relationships based on trust, transparency, openness, and active listening, Prysmian is able to understand the evolving expectations and needs of stakeholders who directly or indirectly influence the Group's activities - or are influenced by them. Despite a dynamic and competitive external environment and constant change, the ability to anticipate transitions and identify emerging sustainability trends enables the Group to consistently generate long-term shared value. Our strategy is based on the following priorities and guidelines, which have been translated into clear sustainability objectives.

5.7. SUSTAINABILITY PRIORITIES AND GUIDELINES

Fostering innovation and infrastructure for affordable energy and telecommunications:

- Develop innovative solutions and products that support the improvement of energy and telecom infrastructure (e.g.: number of sustainable products in portfolio)
- Increase the sale of high-quality, reliable, affordable, and low environmental impact products and solutions (e.g.: % of sustainable products sold)
- Enable achieving universal access to energy and telecommunications by supporting affordable and reliable infrastructure (e.g.: number of people/households electrified)
- Enable access to clean energy by providing solutions to renewable energy operators and conducting research into sustainable technologies (e.g.: I.P.)

Pursuing responsible consumption of natural resources and a sustainable supply chain:

- Contribute to sustainable and efficient use of energy and natural resources by reducing consumption and greenhouse gas emissions, minimizing waste generation, and encouraging reuse and recycling (e.g.: number of GHG tons)
- Improve sustainable business practices among suppliers and business partners (e.g.: number of suppliers certified or audited, etc)

Contributing to the development of people and communities:

- Participate in and contribute to the socioeconomic development of communities in the areas where the Group operates, in accordance with the "Donations" Procedure
- Promote ethical behavior, protect workers' rights and diversity, and foster a healthy work environment, training, and professional development
- Conduct effective, responsible, and transparent communication with stakeholders.

5.8. RISK MANAGEMENT

The Chief Risk & Compliance Officer is responsible, together with management and with second level control functions (e.g. Compliance, Legal, Sustainability, Finance) for ensuring that the main risks affecting Prysmian and its subsidiaries, including those related to sustainability (with which it interacts with the Sustainability Function), are promptly

identified, assessed, managed, and monitored over time by Risk Owners identified for every risk.

During periodic meetings with the Control and Risk Committee, composed of non-executive Board members, the Chief Risk & Compliance Officer updates the Committee on the outcomes of analyses and actions taken, as well as any developments in the Group's Enterprise Risk Management program. An internal management committee composed of the Group's senior management is also periodically updated regarding the trend of Top Risks.

Within the meetings of the Control and Risk Committees, the Committee is also updated at least once a year on any new topics requiring training or more in-depth education, including new tools and methodologies for risk management and monitoring.

6. CONSEQUENCES OF A POLICY VIOLATION

Prysmian Employees agree to uphold our commitment to ethical and integrity-based business conduct, as well as to comply with our Code of Ethics. Employees who violate this commitment or fail to adhere to this Policy will be subject to disciplinary measures, including possible termination, as well as any other legal action necessary to protect Prysmian's interests and reputation. The Company reserves the right, at its sole discretion, to report any legal violations by Prysmian Employees to the relevant regulatory authorities.

7. REPORTING A POLICY VIOLATION

As Prysmian Employees, you are required to report any violation of this Policy through:

- a. The [Prysmian Integrity First Helpline](#); or
- b. The relevant Regional Compliance Team or other authorized parties indicated in this Policy.

Any form of retaliation, including threats or attempts at retaliation, is strictly prohibited. Prysmian is committed to ensuring that all stakeholders are free to report any actual or suspected violation of the Prysmian Code of Ethics or any other company policy or procedure, provided they have reasonable grounds to believe that the reported issues are true. There will be no negative consequences or retaliation in the workplace, either personally or professionally, for making a valid and legitimate report.

It is understood that the ability to report concerns, in line with the Helpline Policy, is guaranteed to all Prysmian stakeholders.

8. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT

As defined by ISO Standard 37002, this Policy and its processes will be reviewed by the Internal Audit Department at least every 3 years, based on the Internal Audit Risk Assessment. Additionally, the Group Compliance Function regularly monitors the Whistleblowing Management System in coordination with the Helpline Committee, identifying any potential deviations from the Policy and/or opportunities for improvement. The system and procedures may be adapted at any time based on audit results and monitoring activities to ensure alignment with Prysmian's needs.

9. RELATED DOCUMENTS

The documents listed below are considered related to this Policy and must be consulted by all Prysmian Employees for further guidance. Some of these documents are available in the *Ethics & Integrity* section of the [company Intranet](#) and are also publicly accessible in the corresponding section of our [corporate website](#).

- a) Code of Ethics
- b) Helpline Policy
- c) Donations Procedure
- d) Human Rights Policy
- e) Diversity & Inclusion Policy
- f) HSEE Policy