

# SPONSORSHIPS PROCEDURE

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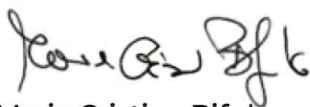
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Procedure n°: 11	Version n°: 01	Scope: Worldwide
Title: <i>Sponsorships Procedure</i>		Issue Date: June 2024

## TABLE OF CONTENTS

1.	Purpose and Objective	2
2.	Procedure Owner	2
3.	Applicability	2
4.	Definitions	2
5.	Guiding Principles	2
6.	Operating Procedures	3
7.	Traceability	5
8.	Consequences of Procedure Violation	5
9.	Reporting a Procedure Violation	6
10.	Audit, Monitoring and Continuous Improvement	6
11.	Related Documents	6

Procedure n°: 11	Version n°: 01	Scope: Worldwide
Title: <i>Sponsorships Procedure</i>		Issue Date: June 2024

## 1. PURPOSE & OBJECTIVE

The purpose of this Procedure is to provide guidance and establish requirements for the management of any Sponsorship activities by Prysmian.

## 2. PROCEDURE OWNER

Group Corporate Sustainability, Investor Relations and Communication owns this Procedure and is responsible for periodically reviewing and updating it to ensure it accurately reflects regulatory, best practice, or business developments.

## 3. APPLICABILITY

This Procedure applies to all Prysmian Functions and Companies involved in the request, approval, and provisions for Sponsorships.

## 4. DEFINITIONS

“Sponsorships” refers to any payment in favor of third parties for **displaying the brand and/or promoting the image of Prysmian**, with the aim of increasing the reputation and prestige of the Company and creating value for its shareholders.

## 5. GUIDING PRINCIPLES

The choice of which activities to sponsor should meet specific defined criteria designed to improve the process and avoid requests that are not in line with the Prysmian’s mission, vision, values, Code of Ethics, strategic guidelines, the policies, and procedures put in place and the Organizational Model pursuant to the 231/2001 Legislative Decree. What can be sponsored:

- initiatives related to the business / corporate activities of the Group and carried out in sectors related to its activities
- institutional / corporate carried out in **social, cultural, sports or artistic field**

and may be:

- sponsorship of an event, roadshow (digital or physical)
- sponsorship of a trade show or exhibition (digital or physical)
- institutional activities
- sponsorship of an editorial event from newspapers or magazine
- sponsorship of associations (including sports) or individuals
- technical sponsorships

Procedure n°: 11	Version n°: 01	Scope: Worldwide
Title: <i>Sponsorships Procedure</i>		Issue Date: June 2024

The projects to be sponsored should always be characterized by:

- consistency with the values, mission and vision of the Group and corporate communication strategies
- the morality and integrity of the beneficiary

What cannot be sponsored:

- Activities that are in any way illegal, dangerous, or harmful for the Group and its reputation
- Activities in conflict with Prysmian's mission, vision, values, Code of Ethics, strategic guidelines, policies, and procedures put in place and the Organizational Model pursuant to Legislative Decree 231/2001
- Associations and organizations which discriminate on the basis of race, skin color, sex, religion, nationality or ethnicity

The Group also prohibits:

- promising or paying sums of money, or granting goods in kind or other benefits to third parties, such as: customers, suppliers, Public Administration Bodies, public institutions, or other organizations with the aim of promoting or favoring the Group's interests
- resorting to other forms of aid or contributions which have the same purpose as those prohibited above

## 6. OPERATING PROCEDURES

Based on the abovementioned guidelines, Prysmian has established and formalized a procedure for assessing the sponsorships' beneficiaries, approving, and monitoring sponsorships, identifying the thresholds beyond which a stricter approval flow is required.

### Anti-corruption due diligence

The first step of the operating procedure is that the beneficiary of any sponsorship will have to comply with the ethical conduct principles adopted by Prysmian. In fact, **before proceeding with any sponsorship**, an anti-corruption due diligence must be carried out on the potential beneficiary assuming it has not been sponsored in the past and a prior due diligence not completed. This assessment is performed via a dedicated online platform, in accordance with the "Third Party Program" Procedure and the ISO 37001 Standards as well as the Group's Antibribery Management System.

Procedure n°: 11	Version n°: 01	Scope: Worldwide
Title: <i>Sponsorships Procedure</i>		Issue Date: June 2024

If the due diligence provides a positive result, the sponsorship's approval process will proceed; otherwise, if the due diligence result is negative, the approval process is interrupted.

### Approval process

#### a) Management Plan

Every year, when preparing the Management Plan, the Group Corporate Sustainability, Investor Relations and Communication prepares an overall budget for its Management. Within the budget, approved by the Group CEO, the preferred areas of activity are identified and considered strategic in line with the Group's Communication Plan, **including sponsorship activities.**

#### b) Identification of sponsorship initiatives and business partner

The Head of Group Corporate Sustainability, Investor Relations and Communication actively identifies initiatives and opportunities for commercial sponsorship or for receiving requests for sponsorship from third parties in written form directly. Initiatives and opportunities for commercial sponsorship may also be identified by other Group Functions or subsidiaries. In all cases the Head of Group Corporate Sustainability, Investor Relations and Communication is responsible for assessing the appropriateness of the amount of sponsorship in relation to the specific request and, if possible, to other similar sponsorship operations.

#### c) Approval of individual sponsorship initiatives

Based on the monetary value of the sponsorship and before any disbursement of funds, the Group differentiates the approval process as follows:

- **for a sponsorship of less than € 20,000, Regional CEOs will be given the flexibility to determine what sponsorships** to pursue in view of local activities. Regardless of those decisions, the local teams **will be required** to complete the appropriate forms via the Service Now platform and said forms will be sent on a notification basis to Group Corporate Sustainability, Investor Relations and Communication, Compliance and Tax functions
- **for a sponsorship of €20,001 to less than € 50,000, the Regional CEO and the Group's Corporate Sustainability, Investor Relations and Communication Officer** will be required to approve the Sponsorship request via the Service Now ticket which will be created on the

Procedure n°: 11	Version n°: 01	Scope: Worldwide
Title: <i>Sponsorships Procedure</i>		Issue Date: June 2024

appropriate platform. The Compliance and Tax Functions must be properly informed via Service Now

- for a sponsorship exceeding € 50,000, the Regional CEO and the Group's Corporate Sustainability, Investor Relations and Communication Officer, Compliance and Tax Functions must formally approve via the Service Now platform the initiative prior to the disbursement of any funds. **Final approval will be required by the CEO for any sum greater than €50,000.**

Following the above approval process for the disbursement of funds, the Prysmian's Corporate Sustainability, Investor Relations, and Communication Officer signs the sponsorship request within the limits of his/her power of attorney. Above the Group's Corporate Sustainability, Investor Relations and Communication Officer power of attorney, the CEO will be required to sign the sponsorship request.

#### d) Negotiation and contractual commitment

All sponsorship initiatives must be formalized in a contract/agreement, which, where necessary and required, shall be drawn up, or at least revised, by Legal and Corporate Affairs and Group Compliance Function for 231 compliance.

In the sponsorship contracts/agreements, shall always indicate:

- the object of the sponsorship (in kind and/or in cash)
- a description of how sponsorship needs to be implemented
- the duration of the contract
- the payment terms (if applicable)
- the commitment of the sponsor to observe the ethical and behavioral principles adopted by the Group

## 7. TRACEABILITY

The traceability of the individual stages of the process managed and documentation archived (copy sponsorship contract) by the Group Corporate & Business Communications and Public Affairs' Function. With regards to approved sponsorship invoices, the Finance, Administration & Control Department (approved sponsorship invoices) is responsible for filing such documents.

## 8. 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

Procedure n°: 11	Version n°: 01	Scope: Worldwide
Title: <i>Sponsorships Procedure</i>		Issue Date: June 2024

required to protect the interest and reputation of Prysmian, in line with the applicable legislation.

## 9. REPORTING A PROCEDURE VIOLATION

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

## 10. 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.

## 11. 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) Anti-corruption Policy
- c) Donations Procedure
- d) Third Party Program Procedure