

Prysmian Group – Human Rights Policy

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Company Commitment

Companies have the responsibility to respect the international human rights standards, consider people's rights and address any adverse human rights impacts that they may cause or contribute to. This universal responsibility for business enterprises is defined by the "Protect, Respect and Remedy" framework, welcomed by the United Nations Human Rights Council in 2008. Inspired by the principles and concepts expressed in the Ruggie Framework, Prysmian's commitment to the respect of human rights consists in adopting this Human Rights Policy, implementing a structured process to support internationally recognised human rights standards and avoiding any complicity in human rights violations.

The Policy embraces and complies with several international conventions such as the International Bill of Human Rights, including the Universal Declaration of Human Rights, and the Fundamental ILO Conventions detailed in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. It defines Prysmian's commitment to protect fundamental human rights, including the dignity of the individuals working in its operations, and to promote the respect of all human rights within its value chain and business relationships.

Within Prysmian's sustainability commitment, ethical principles are extremely important. The Group believes that an ethical business conduct is a driver for the success of its business. Prysmian enforces its journey towards the respect of human rights and the responsible business practices adopted with the publication and the implementation of its Code of Ethics. Principles expressed in the Group's Code of Ethics are to the highest standards of ethical behaviour, and follow applicable laws and regulations. Moreover, aiming at developing a sustainable value chain, Prysmian has adopted a Code of Business Conduct, which is a document embracing the Group's responsible business practices by ensuring that ethical, economic, environmental and social standards are respected along the Group's value chain.

Third parties cannot derive or enforce any rights from this declaration.

Purpose and scope of the Human Rights Policy

The principles mentioned in this Policy apply to Prysmian Group's physical and legal boundaries in terms of business activities and operations carried out by the workers of Prysmian S.p.A. and its subsidiaries. The Policy also applies for those workers which are independent contractors working in Prysmian Group venues and plants.

Prysmian is committed to supporting the adoption of the principles reported below along its value chain and within the communities in which it is present. In addition, the Group encourages all suppliers it works with to adopt the Policy. The Group aims at building a responsible and sustainable value chain.

Prysmian is committed to progressively assessing its suppliers' respect of the principles reported in this Policy, through a structured process supported by audits with the aim of monitoring the supply base in order to prevent any violation and, if necessary, firmly take actions in order to identify any denial of human rights. As expressed in Prysmian Group's Code of Business Conduct, if any violation of the principles occurs, Prysmian Group reserves the possibility to reconsider the future of the commercial partnership with the involved business partners.

Principles

Prysmian's commitment relies on principles concerning the fundamental human rights contained in the ILO's Declaration on Fundamental Principles and Rights at Work.

Non-discrimination

Prysmian respects diversity and avoids any form of unfair or unlawful discrimination in employment or occupation, promoting a culture where people recognise the value that a diverse and inclusive workforce brings. Prysmian Group is committed to embracing all the differences in employees' age, gender, marital

status, race or ethnicity, nationality, religion or other beliefs, sexual orientation, social and educational background, family and care responsibilities and any other form of diversity. Consistent with the ILO Convention No. 111. Prysmian aims at creating a safe working environment, free from any direct or indirect and associative or individual discrimination, any sort of violence or harassment, either sexual or based on personal, political and cultural diversity. In case any discrimination occurs, it will not be tolerated and actions will be taken. The aim of Prysmian Group is to make sure that all the employees are treated with dignity, respect and fairness, and that they exhibit a conduct that reflects the values of the Group.

Child labour

Prysmian commits to the effective elimination of child labour in its supply chain and adheres to the principles established in the ILO Convention No. 138 and 182 in which hazardous work, considered as any work which is likely to negatively impact children's physical, mental or moral health, safety or morals, is prohibited to children under the age of 18. The minimum working age should respect the age of compulsory schooling, and should be no less than 15 years of age. The group commits to providing decent work for young workers and ensuring protection and safety of children in all business activities and facilities, while reinforcing community and government efforts to protect and fulfil children's rights.

Forced, bonded and compulsory labour

Prysmian ensures voluntary employment for all its employees and eliminates any form of forced, bonded and compulsory labour, following the ILO Convention No. 29 and 105. Banned forced labour also includes human trafficking, threatening workers with severe deprivations, such as withholding passports or other ID documents, food or land or wages, physical violence or sexual abuse, or bonding workers through debts.

Freedom of association and recognition of the right to collective bargaining

Prysmian commits to an open and constructive dialogue with its employees and their representatives. Adopting the ILO Convention No. 87, 98 and 154, employees can engage in collective bargaining according to the applicable national laws, as a way for determining the contractual working conditions and regulating the implementation of collective agreements.

Health and safety

As underlined in its Group Policy on Health, Safety and Environment, Prysmian's duty is to ascertain that the working conditions of its employees respect health and safety standards, ensuring a safe working environment for all workers and employees. As outlined in ILO Conventions No. 148, 155 and 176, the absence of disease and physical and mental elements affecting health, which are directly related to safety and hygiene at work, must be guaranteed. In addition, it must be guaranteed also the absence of noise, air pollution and vibration. Moreover, Prysmian commits to preventing any fatalities, injuries or ill health affecting workers or members of the public, or damaging the environment due to its operations.

Working conditions

Contracts must have written agreements on employment, containing agreed terms and conditions, including notice periods on both sides. By following the ILO Convention No. 122, Prysmian guarantees the fullest possible opportunity for each worker to qualify for, and to use his/her skills and endowments in a job for which he/she is well suited. Employees are guaranteed the respect of working hours set on national laws and industry standards, access to all the necessary facilities to create a pleasant working environment and holidays according to national legislation. Training is provided to all employees and the Group is committed to equality of access to development and education opportunities.

Fair wages and equal compensation

Prysmian, following the ILO Conventions No. 100 and 131, ensures a fair and equal remuneration to its employees and complies with national regulations on

salary and any additional emoluments. Employees are guaranteed with respect of minimum wage set by the relevant national law, if present, and are provided with all benefits which are legally required or agreed upon in their contract. In case of overtime hours, employees are compensated according to the national established salary or, in those countries where such regulation does not exist, the compensation will be at least equal to their regular hourly pay. The group is committed to gender equality and equal remuneration for male and female employees; male and female equal value of work is also ensured.

Grievance mechanisms

In order to avoid any violation of the Human Rights Policy, Prysmian's employees should be regarded as the 'eyes and ears' of the business, the 'first line of detection'. For this reason, Prysmian provides access to an independent grievance mechanism to raise concerns or identify adverse human rights impacts. The Whistleblowing Policy encourages and enables the employees to raise serious concerns on any violations of the Code of Ethics, other Group policies and their principles. The whistleblowing mechanism is available to anyone who works for Prysmian Group or who conducts business on behalf of Prysmian Group or any of its Subsidiaries. Through Whistleblowing any involved party can:

- report information about illegal actions or practices which are not compliant to the Group's policies;
- raise concerns about any sort of misconduct within our Group.

Employees are encouraged to raise any concern about violations of business ethics as outlined in the Ethical Code; financial and accounting fraud, breach of the Internal Control System, harassment, intimidation or discriminatory behaviour to employees or third parties or serious health and safety risks that could threaten the health and safety of employees, the general public, our customers or the company's reputation. Prysmian, through the Whistleblowing Committee, will accurately evaluate reported matters, performing specific investigation and adopt coherent and appropriate measures.

Commitment towards local communities

Prysmian Group's responsibility towards local communities refers both to Prysmian employees and to people living in proximity to Prysmian plants. Prysmian recognises the rights of indigenous people as they are detailed in the ILO Convention No. 169, including the right of local communities to exercise control over their own institutions, ways of life and economic development and to maintain and develop their identities, languages and religions within the framework of the States in which they live.

Prysmian respects the local communities' identities, their right to live in good conditions and the quality of their local environment. In planning or implementing environmental and resource-use strategies, Prysmian ensures that its business operations do not contribute to any human rights violation, any damage to the environment or any reduction of access to natural resources. Furthermore, Prysmian contributes to the economic development of the community ensuring a fair, equal and respectful treatment and exerting a positive influence on the local area. Prysmian supports the dialogue with community's representatives and is committed to promoting engagement activities with local stakeholders, contributing to existing programmes or planning and implementing social investment programmes in cooperation with governments and civil society actors.

Review

Due to the continuous changes in the external context, all the issues connected to the human rights protection need to be subjected to a periodic review. This Policy can thus be modified whenever considered necessary, in order to ensure its adequacy and effective implementation.

Implementation and reporting

Prysmian values its relationship with the stakeholders, their engagement and the continuous communication. For this reason, Prysmian commits to reporting the

most relevant data annually and the results of the monitoring process of human rights issues in the Group Sustainability Report. In order to ensure the implementation of the Policy through all business operations:

- training is provided to Prysmian's management and supervisors and any appropriate information is given to all employees, with the aim of raising awareness of the topic, presenting and explaining the principles supported by the Group and the tools and policies in place;
- the monitoring of the adequate application of the principles outlined in this Policy, together with the principles expressed in the Code of Ethics and the Code of Business Conduct, will be included in human rights assessment processes.

Responsibility within Prysmian Group

Prysmian has a Compliance department monitoring the implementation and respect of the Code of Ethics and the other relevant policies. The structure of the department includes the following roles:

- **Chief Compliance Officer:** he/she reports to the Control and Risks Committee and the Chief Executive Officer of the Group. He/she is responsible for managing all compliance policies and procedures, including the Code of Ethics.
- **Local Compliance Officers:** he/she is present in each company of the Group and has the responsibility of implementing all relevant policies.

The responsibilities of the Compliance department with respect to human rights include:

- conducting, in conjunction with the other relevant functions involved, appropriate human rights assessment activities, within their respective areas of responsibility;
- reporting on the implementation and results of assessment activities to the Control and Risk committee;
- reporting annually for the Group's Sustainability Report on Prysmian's performance regarding the commitments detailed in this document.

References

Prysmian commitment is inspired by internationally recognised standards related to human rights:

- *The International Bill of Human Rights;*
- *The Universal Declaration of Human Rights;*
- *The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and its conventions;*
- *The United Nations "Protect, Respect and Remedy" Framework, developed by the United Nations Human Rights Council;*
- *OCSE Children's rights and Business principles;*
- *SA8000 Guidelines;*
- *OECD Guidelines for Multinational Enterprises;*
- *The United Nations Global Compact;*
- *ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;*
- *UK Modern Slavery Act;*
- *UNICEF and The Danish Institute for Human Rights, Children's Rights in Impact Assessments, December;*
- *Amnesty International – italian chapter, Dichiarazione Universale dei Diritti Umani;*
- *CSR Europe Assessing the effectiveness of company grievance mechanisms;*
- *European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights.*

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