

PRYSMIAN GROUP GLOBAL HUMAN RIGHTS POLICY APPENDIX

Global Anti-Harassment Policy

February 2021



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1. GROUP STATEMENT

Prysmian Group is committed to the development of an organization that prioritizes talent, abilities, diverse experiences, different cultural backgrounds, and, in general all forms of diversity: ethnic, race gender, language, age, sexual orientation, marital status, nationality, religion, political orientation, socio-economic status, physical and mental ability, experience, education and professional background.

In promoting such a diversified environment, **Prysmian wants people to feel respected, appreciated and free to fully express their human potential**, which means qualifying diversity and inclusion as one of the main pillars of the company culture. Accordingly, Prysmian has also adopted a Human Rights policy which supports internationally recognized human rights standards and regulates violations of those standards.

For all the reasons above, Prysmian’s employees are encouraged to raise any concern about violations of the principles outlined in the Code of Ethics and the Human Rights policy.

In ensuring the respect of the previously mentioned principles, Prysmian Group is committed to regulate the anti-harassment procedures and to monitor the behavior of those who have been involved in harassment-related issues. Prysmian Group regulates these procedures through this Anti-harassment policy which is an Appendix of the Human Rights policy.

The Company is committed to support the adoption of the anti-harassment principles along its value chain and within the communities in which it is present, encouraging their adoption to all its suppliers.

2. SCOPE

The purpose of this policy is to create a safe working environment, free from any type of discrimination, any sort of violence or harassment, either sexual or based on personal, cultural and political diversity. Prysmian wants all the employees to be treated with dignity, respect and fairness, and exhibit conduct that reflects the values of the Group.

Additionally, Prysmian Group aims at building a responsible and sustainable value chain and, if any violation of the principles was to occur, the Group reserves the right to reconsider either the future of the commercial partnership with the involved business partners or to take appropriate action against their involved employees.

3. DEFINITIONS

• Harassment

Harassment can occur in many different forms. **It is any unwelcome and uninvited behavior which has no legitimate workplace function, and which intimidates, humiliates or offends another person or a group of persons.** Harassment may occur on the basis of:

- sex;
- age;
- marital status,
- race, color, national origin, ancestry;
- disability;
- religion or belief;
- sexual orientation;
- gender identity or expression or gender reassignment;
- domestic or civil partnership status;
- alienage or citizenship;
- military status, veteran status;
- genetic predisposition;
- pregnancy and maternity;
- medical conditions;
- status as a victim of domestic violence;
- unemployment;
- any other category protected by law in the local jurisdiction.

In specific circumstances, harassment may include jokes, epithets, stereotypes, threats, intimidations, hostile acts, defamation, insults, aggression, derision, spreading of confidential and/or malicious information, offensive written materials and any other conduct aiming at denigrating an individual or group of people on one or more of the bases listed above.

Harassment can make a person feel offended, hurt, upset, humiliated, frightened, intimidated, anxious, frustrated or afraid. It may occur through persistent aggression of physical, verbal or psychological nature, such as:

- persistent and negative attacks on a person's performance;
- manipulation of an employee's image and reputation by spreading rumors and gossips about him/her/*;
- offensive comments;
- exclusion of a person from professional activities and opportunities.

- **Sexual harassment**

Sexual harassment is any unwelcome sexual advance, request for sexual favors or other conduct of a sexual nature; it may take the form of a threat or an implication.

Types of behavior which can constitute sexual harassment include:

- sexual or physical contact (e.g. kissing, patting, pinching, touching, hugging, grabbing, brushing);
- staring or leering;
- unwelcome comments or questions about a person's sexual activity, appearance, dress or body;
- unwelcome messages of a sexual nature sent both by paper and via electronic devices;
- lewd comments, dirty jokes, foul language, sexual overtones;
- offensive and suggestive body language;
- displaying offensive images;
- inappropriate and unwelcome content sent or posted via a social media site, including inappropriate advances or content of a sexual nature (e.g. pictures, posters, calendars, graffiti, objects, promotional material, reading material, photos);
- explicit or implicit request for sexual favors accompanied by implied or open threats concerning the target's job performance evaluation, a promotion or other job benefits;
- sexual assault (e.g. rape, sexual battery, molestation or attempt to commit these assaults);
- hostile action against a person due his/her/* sexual orientation, gender, gender identity (e.g. destroying a person's workstation, interfering with a person's ability to perform the job, sabotaging someone else's work, bullying, yelling, name-calling).

- **Vilification**

Vilification is a public act which incites, encourages, or urges others to hate or severely ridicule a person(s) because they are part of a particular group.

- **Bullying**

Bullying is repeated unreasonable behavior towards another person that creates a risk to their mental or physical health and safety. The following are examples of bullying behavior:

- victimization;
- humiliation;
- intimidation;
- threatening someone;
- spreading rumors about someone;
- targeting a person via social media tools;
- isolating a person from a work team;
- psychological and/or physical abuse.

Bullying can result in a hostile work environment in which an offender continuously irritates, marginalizes, humiliates, or ostracizes a person.

On the contrary, reasonable management actions such as allocating work, setting deadlines, giving fair and constructive feedback, deciding not to award a promotion or benefit, or informing an employee about unsatisfactory performance, for example, do not constitute bullying.

- **Intimidation**

Intimidation is unreasonable use of status or authority upon an individual requiring him/her/* to act in an inappropriate way or to do something which is not in line with the Group's policies.

4. REPORTING PROCEDURES

Harassment is a serious violation and must be reported whenever there is suspicion or certainty that it is occurring. Addressing harassment concerns or allegations may be done either informally **or** formally as detailed below.

- **Informal Procedure**

This process is based on the belief of the Prysmian Group that all Managers must always:

- be ethical role models;
- be available to listen to concerns/problems of Prysmian's employees and offer them guidance and support;
- promote a positive working environment in which employees feel free to start a reporting process;
- make sure that any corrective action taken is consistent with the Company's policies;
- give their team members the necessary training to work safely and in compliance with the law.

This way of reporting encourages the reporter to consider taking the following steps:

- if he/she/* feels comfortable to do so, they may try to resolve the matter directly with the other party involved
- if this is not possible, the issue should be referred to a supervisor who can manage the issue informally by speaking with all involved parties.

- **Formal procedure**

All employees have the ability to pursue a more formal process if they do not feel comfortable reporting through the informal procedure or feel the issue was not fully resolved through the informal procedure. The Prysmian Group has adopted the Helpline policy to outline ways in which concerns related to the violation or potential violation of the Prysmian Group Code of Ethics, or any other Company policy or procedure, can be reported¹. The Helpline policy provides a person, who needs to report an issue, the ability to contact the Integrity First Helpline center (by mail, telephone or Internet) or, in the alternative, the Regional Compliance Leader, Legal or HR business partner. The information related to the issue reported, such as the identity of

¹ The [Helpline](https://www.prysmiangroup.com/en/company/ethics-integrity/helpline) provides employees with 3 reporting channels (web, email, phone) in 27 languages and is available 24 hours a day and 7 days a week. Please refer to www.prysmiangroup.com/en/company/ethics-integrity/helpline for the reporting channel contact details.

the people involved and the allegations or facts remain confidential; moreover, the Helpline Committee (charged with reviewing Helpline submissions) is impartial and no repercussions are taken against those who submit a good-faith complaint or help others in submitting a good-faith complaint.

5. SUPPORT TO OFFENDED EMPLOYEES

As written in the Helpline policy, after a report has been submitted to the Integrity First Helpline, the Helpline Committee begins investigating to determine if the allegations are substantiated or unsubstantiated. If the Committee substantiates the allegations corrective actions may be taken. Potential corrective actions are listed below:

- coaching;
- verbal reprimand;
- suspension;
- salary action;
- demotion/transfer;
- termination;
- additional legal action;
- follow up with the Offended Employee (closing the issue/case).

6. ANTI RETALIATION

Whether the report is substantiated or unsubstantiated, the Helpline Committee may establish a plan to monitor the situation and to avoid cases of retaliation. Disciplinary action may be taken against those who have acted in bad faith or have not been honest, truthful, or have impeded the investigation; disciplinary action taken under these circumstances is not retaliation.

The Group maintains Helpline reports to periodically analyze and interpret trend data with the goal of proactively improving communication and implementation of compliance updates to policies, procedures, and practices.