Anti-slavery and human trafficking statement

Our commitment:

Prysmian is committed to ensuring that all of our workers are safeguarded, treated fairly and with dignity. We will not tolerate any form of exploitation and human trafficking whether this relates to our directly employed workforce or any of our supply chain.

Within Prysmian's sustainability commitment, ethical principles are extremely important. We believe that ethical business conduct is a driver for the success of our business. Prysmian's Code of Ethics requires the highest standards of ethical behaviour and compliance with applicable laws and regulations. In addition, Prysmian has adopted a Code of Business Conduct, which is a document embracing our responsible business practices by ensuring that ethical, economic, environmental and social standards are respected throughout Prysmian's value chain.

Our organisation:

Prysmian is the world leader in energy and telecom cable systems with a direct presence in more than 50 countries around the world, 108 plants, 26 R&D centres and over 30,000 employees. In the financial year ended 31 December 2023, Prysmian had sales in excess of 15 billion euros. To find out more about Prysmian, please visit https://www.prysmian.com/en.

Prysmian PowerLink is responsible for the design, production and installation of high and extra high voltage cables and systems for the underground and submarine power transmission directly from power stations to primary distribution grids.

Prysmian offers cutting-edge services for submarine power connections for offshore wind farms, ranging from project management to cable installation.

Prysmian has a fleet of four among the most state-of-the-art cable-laying vessels in the world and a wide range of high–tech burial tools, offering extended project versatility and deep-water installation capabilities of up to 3,000 m, as well as shallow water and near-shore solutions.

In addition to these four vessels, Prysmian can also count on a shallow water cable-laying barge, designed to operate in ultra-shallow water. The barge is equipped with a 4-point mooring system and a main pulling winch on the bow. The main tool onboard is a vertical injector, although the barge can be used for various other tools, including the SeaREX trencher for coastal operations.

Further, Prysmian has previously announced three new cutting-edge vessels which will be fully operational in 2025 and 2026 and will reinforce Prysmian's project execution capabilities and its EPCI (Engineering, Procurement, Construction, Installation) approach.

Prysmian constantly invests in manufacturing capabilities and installation assets, always improving and innovating, offering new installation solutions that range from off-the-shelf equipment to bespoke designs. Our extensive track record means that our submarine cable installation expertise is second to none – we get the most of the resources at our disposal to ensure project efficiency and safety at all times. From shallow water to deep water, from soft soils to hard soils, from single cable to bundled cables, Prysmian has the experience and assets to provide full-fledged cable installation solutions of any type.

In undertaking these activities Prysmian utilises its directly employed workforce as well as an extensive global supply chain.

Our policies:

Prysmian Code of Ethics

The Code of Ethics states that Prysmian, in the conduct of its business, stands up for the respect and protection of human rights, safeguarding the dignity, freedom and equality of human beings. Prysmian repudiates all forms of discrimination and illegal conduct and activities, such as corruption, forced or child labor.

The Code of Ethics requires all Prysmian companies and anyone conducting business on their behalf, including employees and suppliers, to comply with the principles including respecting all applicable laws wherever we do business and following all commonly accepted principles of business ethics.

Violations of the Code of Ethics, or any of the implementing policies and procedures or other Prysmian policies, or of any applicable law or regulation will be grounds for serious disciplinary action, including possible termination of employment and/or termination of business relations.

Prysmian Human Rights Policy

The Prysmian Human Rights Policy states Prysmian's commitment to ensuring voluntary employment for all its employees and eliminating 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.

For copies of the Prysmian Code of Ethics and Human Rights Policy, please visit https://www.prysmian.com/en/sustainability/ethics-and-integrity

Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures in relation to both recruitment and our supply chain. Due diligence in relation to our supply chain is undertaken both at the point of engaging a new supplier and periodically throughout the duration of the relationship in the form of reviews and audits.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

Risk and compliance

Prysmian evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain. Due to the global nature of our supply chain, we consider that there are some aspects of our business which are exposed to a potentially high risk, for example suppliers located in geographical regions where public indices would suggest the prevalence of modern slavery is high.

As outlined above, irrespective of geographical location, we undertake due diligence on all of our supply chain and require all our suppliers to adhere to our Code of Ethics. We enforce a strict code of compliance and will not tolerate slavery and human trafficking within our supply chains.

Training:

Prysmian's Compliance team organize regular training to our staff on all compliance related topics, including our Code of Ethics and Human Rights Policy. During 2023, our Global Compliance team delivered more than 10,000 hours of training sessions on a variety of compliance topics.

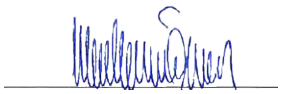
Through all of our training programmes, employees are encouraged to identify and report any potential breaches of any of our compliance policies.

Further actions:

Following a review of our actions in the financial year to 31 December 2023 to prevent slavery or human trafficking from occurring in our business or supply chains, throughout 2024 we intend to continue with our programme of supplier audits. In addition, Prysmian's Compliance team will continue to organize regular training to our staff on all compliance related topics.

Approval of statement:

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2023. The statement has been approved by the board of directors of Prysmian PowerLink S.r.l.



Hakan Ozmen
CEO, Prysmian PowerLink
4 March 2024