

Human Rights Policy Statement

(Germany)


Our commitment to respect human rights

- **We are conscious of our corporate responsibility to respect human rights in our own business activities, in both our supply and value chains. We are committed to complying with all relevant and applicable national laws.**
- This Policy formulates the position of PKS (Prysmian Kabel und Systeme GmbH) with regard to human rights. It constitutes a binding document for our organisation. Set out in concrete terms through our Code of Ethics and Conduct as well as our internal Processes and Rules, it is binding on all PKS employees. It applies to all of our organisational units equally and guides our actions both internally and externally. It is integral to our understanding of sustainable development and is the basis for interpreting and refining existing rules. At the same time, this Policy underscores how we see ourselves in a human rights context in relation to our clients and the general public. It formulates our expectation that our business partners, partner institutions and suppliers will comply with human rights law.
- We are an innovative world leader when it comes to manufacturing cables and wires as well as their systems and play a significant role in technical progress. As such, we have undertaken to respect human rights as well as the rights of employees and their interest groups and to protect the environment.
- In fulfilling our due diligence obligations, we also comply with the following provisions of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG):
 - Section 4 LkSG Risk management
 - Section 5 LkSG Risk analysis
 - Section 6 LkSG Preventive measures
 - Section 7 LkSG Remedial action
 - Section 8 LkSG Complaints procedure
 - Section 9 LkSG Indirect suppliers
 - Section 10 LkSG Documentation and reporting obligations


We are also committed to

- protecting and upholding international human rights and ensuring that we are not complicit in human rights violations
- promoting observance of these rights within our own sphere of influence and ensuring that human rights violations are not caused, facilitated or tolerated by our own business activities
- ensuring the health and safety of employees and relevant stakeholders
- protecting freedom of association and the effective recognition of the right to collective bargaining
- advocating the elimination of all forms of forced labour and the abolition of child labour
- ensuring that we and, where possible, our suppliers comply with international occupational safety standards
- advocating the elimination of discrimination in respect of employment and occupational activities
- following the precautionary principle in dealing with environmental problems, taking initiatives designed to increase environmental awareness and accelerating the development and spread of environmentally friendly technologies


At the same time, we take our human rights due diligence obligations very seriously – we are alert to human rights risks, which we review and monitor. We address risks in order to prevent or minimise any unintended adverse impact of our activities on human rights. We ensure that responsibilities are clearly defined within our organisation and are assigned to individuals with the necessary expertise and the relevant powers. This management policy is published and is made available to all employees.

 "Management approach" principles of action

- We continuously work to systematically identify the impact of our business activities on people and the environment and to reduce the likelihood of human rights violations. We continue to develop our processes for ensuring compliance with human rights and identifying risks on an ongoing basis. We report regularly on our challenges and progress.
- All managers and employees of Prysmian Kabel und Systeme GmbH are required to comply with the principles set out in this Policy and to factor them into their daily work. An interdisciplinary team comprising Purchasing, Compliance and Sustainability is responsible for coordinating the operational implementation of the due diligence obligations. The team monitors the implementation of the due diligence obligations within the group and refines our risk management.
- At group level, regular and systematic evaluations (due diligence) that encompass human and personal rights are conducted within the framework of our sustainability, risk and compliance management system. Courses of action and measures are taken where necessary. Existing processes for ensuring compliance with human rights and identifying potential risks are also regularly reviewed and are refined if required.

 "Suppliers" principles of action


- Sustainable supplier management and respectful business relationships are important to us. Our Supplier Code of Conduct sets out our expectations of our business partners with regard to labour and human rights, ethics and the environment. We drive forward a continuous improvement process in consultation with our suppliers, which also contributes to sustainable development.
- The principles contained in our Supplier Code of Conduct form an integral part of our supplier selection and assessment processes. By accepting the code, our suppliers undertake to apply it and to inform their relevant employees about it.
- Furthermore, we have set ourselves the goal of raising awareness among suppliers of social issues and matters relating to labour law. Compliance with social standards is also covered in supplier assessments, negotiations leading to the award of contracts and supplier development processes.
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 "Complaints procedure" principles of action

- Potential regulatory infringements, human rights violations and environmental concerns can be reported using our group-wide complaints procedure, which we consider integral to our responsibility. Through the complaints procedure, anyone who may be affected by the economic activity of Prysmian Kabel und Systeme GmbH along the supply chain can report potential grievances.
- Any suspicions of misconduct may be reported, whether internally by employees or externally by business partners or other affected persons, to the Compliance Management department of Prysmian Kabel und Systeme GmbH via our complaints procedure.
- We ensure that our staff have the knowledge, awareness and capacity needed to implement this Policy.
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9 November 2023

(Date)


Frederick Persson (CEO)