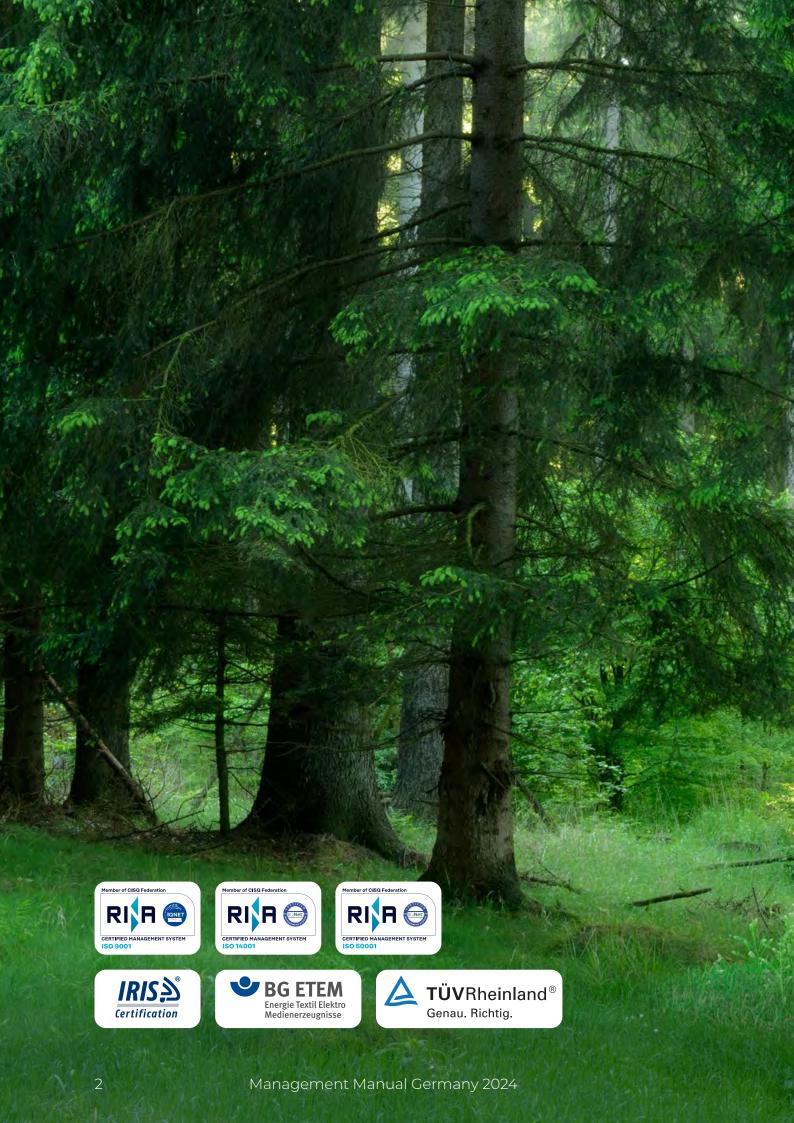


MANAGEMENT MANUAL 2024

Edition October 2024

Occupational Health and Safety, Quality, Environmental Protection & Energy Efficiency Prysmian Germany







Edition October 2024

Occupational Health and Safety, Quality, Environmental Protection & Energy Efficiency Prysmian Germany





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1 INTRODUCTION

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1.1 FOREWORD

Our customers' expectations, socio-political responsibility, corporate obligation and, last but not least, statutory regulations call for a high and consistent quality of our products as well as a high environmental standard in compliance with occupational health and safety and the generally recognised rules of technology.

The Managing Director of the individual companies of Prysmian Germany has declared in the management policy the commitment to ensuring the quality of products, as well as the improvement of occupational and environmental protection, and energy efficiency through an Integrated Management System. For this purpose, objectives and continuously effective measures are established and pursued for the planning, control, assurance, and continuous improvement of occupational health and safety, quality, environmental protection, and energy efficiency. The responsible parties regularly ensure compliance with these measures, as well as the appropriateness and effectiveness of the management system.

The following companies are part of Prysmian Germany:

- Prysmian Kabel und Systeme GmbH
- Draka Comteq Germany GmbH & Co. KG
- Prysmian Procject in Nordenham

Prysmian Germany's management system for occupational health and safety, environmental protection, quality, and energy is based on the management policy, is supplemented by documented procedures and regulations, and meets the requirements of the quality management standard DIN EN ISO 9001, environmental management standard DIN EN ISO 14001, energy management standard DIN EN ISO 50001, and occupational health and safety management standard DIN ISO 45001. Additional relevant foundations for the management system

include the rail vehicle construction standard ISO/TS 22163 (IRIS), the IATF 16949 (automotive), and the KTA 1401 safety regulations (nuclear technology).

All parts of the management system are regularly assessed, monitored, and certified by accredited certification bodies, as detailed in the overview.

This management system applies to all locations of Prysmian Germany and is binding for all employees. It also serves as information for our customers and is used by them as a basis for assessing the management system.

The processing and review of this management manual is coordinated by the central QHSE department and is approved by the Managing Director. This printed edition is not subject to the revision service. An updated edition will be produced following any significant changes.

Reviewed and checked:

Organisational Unit: QHSE Name: Ejjat Younes Date: October 2024

Signature:

Approved:

Organisational Unit: CEO Name: Islamoglu Sezgin Date: October 2024 Signature:

3 Halang Can

1.2 CONTEXT / SCOPE OF THE MANAGEMENT SYSTEM

This management manual describes the Integrated Management System of the plants, based on certified standards, and serves as the binding framework for all employees of these companies. Compliance with both the standard requirements and the industry-specific requirements of IATF 16949 and ISO/TS 22163 is outlined in procedural instructions.

Both internal and external issues, as well as the relevant requirements of interested parties, are taken into account within the scope of application.

The recording and evaluation take place as part of the annual management review, to determine the necessary actions based on a procedural instruction.

The structure of the management manual is aligned with the basic structure for management system standards introduced by ISO ("High-Level Structure").

Site	ISO 9001 QM	ISO 14001 EvM	ISO 50001 ENM	DIN ISO 45001	KTA 1401 Nuclear power	ISO/TS 22163 (IRIS)	IATF 16949	ISO/IEC 17025 Acrred.
Berlin (HQ)	~	~	~	~	~	~	×	×
Neustadt	~	~	~	~	~	~	×	×
Schwerin	~	~	~	~	~	×	×	×
Wuppertal	~	~	~	~	×	×	~	~
Nuremberg, Cologne	~	~	~	~	~	×	×	×
Draka Service Nuremberg	~	~	×	~	×	×	×	×

Overview of certificates for the Integrated Management System (IMS)

1.3 PRYSMIAN GERMANY

1.3.1 COMPANY HEADQUARTERS

All companies of Prysmian Germany are subsidiaries of Prysmian S.p.A. in Milan. The company's headquarters are based in Berlin. Production takes place at the sites in Schwerin, Neustadt bei Coburg, Wuppertal, and Nuremberg, while sales activities are carried out in Berlin, Wuppertal, Cologne, and Neustadt near Coburg. The management system applies equally to all these locations.

and wires, industrial and special cables, as well as accessories, telecommunication cables and wires, and cables and wires for the multimedia and automotive sectors. These products are manufactured and tested in accordance with national and international standards and regulations, company specifications, and customer specifications upon request.

Prysmian Germany's product range includes medium and low-voltage cables, installation cables

The main domestic and international customers are:

- Energy supply companies
- Trade and installers
- Industry, infrastructure, and plant construction,
 e.g. shipbuilding, mining, and medical technology, automotive engineering
- Telecommunications companies

Prysmian Kabel und Systeme GmbH Alt-Moabit 91D 10559 Berlin



LOCATION	Personnel As of 12 Jan 2023	Floor area m²	Built area m²	Produced cable quantity FY 2023 Energy [t/a]	Produced cable quantity FY 2023 Telecom [km/a]
Berlin HQ	71	-	-	-	-
Schwerin	270	587,198	80,500	65,000	-
Neustadt	480	267,880	92,776	18,170	-
Wuppertal	346	156,807	36,000	12,155	-
Nuremberg / Cologne	252	77,974	35,440	-	225,560
TOTAL	1,517	1,120,754	264,416	98,212	363,877

12



1.3.2 BERLIN HEADQUARTERS

The company headquarters is located in the Mitte/ Tiergarten district, in the Moabit neighbourhood, on the grounds of Focus Teleport Berlin. The site is bordered to the south by the river Spree and to the north by the "Kleiner Tiergarten" city park. To the west and east, there are further commercial, administrative, and residential complexes. The government district is located in the immediate vicinity (approx. 1 km).

Prysmian Kabel und Systeme GmbH Alt-Moabit 91D 10559 Berlin



ORGANISATIONAL UNITS AT THE BERLIN LOCATION Company Management Sales Division Energy Supply Central Department Occupational Health Companies and Safety, Quality, Environmental Protection, and Energy Efficiency Manage-Sales Division Trade and Installers ment Sales Division Telecommunication Central Department Purchasing * Solutions Sales Division Renewable Energy Central Department Information Technology * Central Department Logistics * Central Department Finance and Controlling * Central Department Product Management Central Department **Human Resources** and Organisation *

TRANSPORT CONNECTIONS



Motorway A100 (4 km)



Berlin Brandenburg Airport (28 km)



Berlin Central Station (2 km)

 $^{^{*}\,\}text{with branch offices at the locations in Schwerin, Nuremberg, Neustadt bei Coburg, and Wuppertal}$

HISTORICAL DEVELOPMENT OF THE BERLIN LOCATION

Reconstruction of various production lines (PVC and XLPE insulated cables) and structural improvements, including renovation

1970 -

1847	Founding of the company as Teleg- raphen-Bauanstalt Siemens & Halske, Schöneberger Straße	1993 1998	Construction of a 600 kV testing hall Transition to the Pirelli Cable Factory Berlin as part of the sale of Siemens AG's high-volt-
1876	First Berlin cable factory, Markgrafenstraße / Kreuzberg		age cable business to Pirelli Cavi e Sistemi S.p.A. in Milan
1883	Salzufer location, Charlottenburg	2002	Cessation of production at the Berlin site
1899	Westend cable factory, Nonnendamm / Siemensstadt	2005	Transition to Prysmian Kabel und Systeme GmbH
1912	Gartenfeld cable factory, Gartenfelder Straße	2007	Relocation to the new site at Alt-Moabit
1945	Dismantling of the Siemens factories, including the Gartenfeld cable factory; post-war	2011	Merger of Prysmian and Draka factories to form the Prysmian Group
	reconstruction of the metal and cable factory as a high-voltage and communication cable factory	2024	Global rebranding to Prysmian



1.3.3 SCHWERIN LOCATION

The Schwerin Cable Factory (KWS) is located in the industrial and commercial area of Schwerin-Sacktannen, an independent district without residential buildings. In addition to KWS as the largest company, a variety of mainly smaller businesses and enterprises are located on its premises. The area is a drinking water protection zone.

At the southern edge of the site, the nearby municipality of Wittenförden has established a commercial area with around 20 small and medium-sized

businesses. To the north, the factory borders Lake Neumühler.

The Schwerin factory produces medium and low voltage cables as well as PVC and rubber-filled compounds. Additionally, the site houses the Research and Development (R&D) department for energy cables.

THE MAIN PRODUCT GROUPS

- XLPE-insulated medium-voltage cables
- Installation cables and wires
- Halogen-free cables and wires with improved fire performance
- Ship cables
- PVC- and XLPE-insulated low-voltage cables

ENERGY AND WATER
CONSUMPTION (Data for FY 2023)

31,722 MWh

GAS **738,091 m**³

WELL WATER 18,538 m³

FRESH WATER

20,959 m³

WASTEWATER 20,959 m³

Prysmian Kabel und Systeme GmbH Kabelwerk Schwerin Siemensplatz 1 19057 Schwerin



TRANSPORT CONNECTIONS



Berlin Brandenburg Airport (200 km) Hamburg-Fuhlsbüttel (via A24 140 km)



Schwerin Central Station (9 km)



HISTORICAL DEVELOPMENT OF THE SCHWERIN CABLE FACTORY

1960	Founding of the Schwerin Cable Factory as Kabelwerk Nord, part of CPO, 54 employees	1992	Merger with Siemens AG, start of infrastruc- ture and logistics changes through invest-		
1963	Production of high-voltage cables, wires, and ship cables, 1,000 employees		ment measures totalling approximately 170 million DM		
1968	Kabelwerk Nord gains the status of an independent factory within the CPO Combine, groundbreaking for the telecommunication cable hall (Hall 13)	1998	Transition to the Pirelli Cable Factory Schwerin as part of the sale of Siemens AG's high-voltage cable business to Pirelli Cavi e Sistemi S.p.A. in Milan		
1971	Kabelwerk Nord becomes the second-largest cable factory in the GDR, 1,600 employees		Relocation of production from the Pirelli Cable Factory Berlin to the Schwerin Cable		
1976	Production of telecommunication accessories, automotive power cables, hanging cables, and consumer goods		Factory		
		2005	Transition to Prysmian Kabel und Systeme GmbH		
1982	Start of production of XLPE-insulated medium-voltage cables	2011	Merger of Prysmian and Draka factories to form the Prysmian Group		
1990	Commissioning of an electron accelerator, transformation into Schweriner Kabelwerke GmbH	2024	Global rebranding to Prysmian		

1.3.4 NEUSTADT BEI COBURG LOCATION

The Neustadt cable and wire factory is located in a growing industrial area on the southern outskirts of Neustadt bei Coburg. The nearest residential area is approximately 300 metres to the northeast. Beyond that, about 1.2 km away, is a water protection zone (wells for the water supply of the city of Neustadt bei Coburg). The small river Röden borders the area to the west at a distance of approximately 600 metres.

The industrial water supply is largely provided by on-site wells, while drinking water is sourced from the public network.

The factory in Neustadt bei Coburg produces rubber-insulated high-voltage cables and wires for the transmission of electrical energy and control signals. Customers can choose from a wide range of plastics

ENERGY AND WATER CONSUMPTION (Data for FY 2022)

25,287MWh

GAS

1412,171 m³

WELL WATER

431,715 m³

FRESH WASSER

6,916 m³

WASTEWATER (DIRECT DISCHARGE)

121,437 m³

WASTEWATER (INDIRECT DISCHARGE)

16,341 m³

and colours for the outer sheaths. Additionally, the site houses the Industrial and Plant Engineering (OEM) sales division and the Research and Development (R&D) department for energy cables.

THE MAIN PRODUCT GROUPS

- Rubber hose cables
- Pre-assembled X-ray cables (electro-medicine)
- Hoisting cables
- Tunnel and mining cables (underground and open-pit)
- Ship cables
- EVC charging
- Airport cables
- Cables for use in drinking and industrial water
- Cables and wires for special applications (e.g. fire-resistant cables)
- Cables and wires for railway vehicle construction (rolling stock)
- Cables for use in wind and solar power plants, and nuclear power plants
- Fixed installation for utility companies (installation & safety)
- Crane cables
- Signalling cables



HISTORICAL DEVELOPMENT OF THE CABLE & WIRE FACTORY NEUSTADT BEI COBURG

1937	Founding of the factory by Siemens Schuckert, production of high-voltage cables and	2011	Merger of Prysmian and Draka factories to form the Prysmian Group
	wires	2016	Expansion of production capacity through
1943	Establishment of the wire drawing facility		the acquisition of Corning Neustadt
1951	Start of production of communication cables	2021	EVC cable production for charging cables
1955	Construction of Hall 2 and office building	2024	Relocation of signalling cable production
1962	Introduction of CC cross-linking technology		from Köpenick (PCI Prysmian Cable Indus-
1963	Expansion of the rubber and PVC mixing		trial
	facility, construction of Hall 3 for communication cable production	2024	Global rebranding to Prysmian

TRANSPORT CONNECTIONS

Motorway A9 - North/South/East (65 km)
Motorway A70 - North/South/West (70 km)
Motorway A73 - North/South (10 km)

Neustadt Regional Train Station (2 km)
Coburg Intercity Station (16 km)

Prysmian Kabel und Systeme GmbH Austraße 99/101 96465 Neustadt bei Coburg



2002 Construction of a new CC facility for crosslinking special cables

Expansion of the wire factory, construction

Installation of an electron accelerator system

Start of production of fibre optic cables

Installation of a salt bath cross-linking plant Transition to Pirelli Cable and Wire Factory

Neustadt as part of the sale of Siemens AG's

high-voltage cable business to Pirelli Cavi

of the technical centre

in the production area

e Sistemi S.p.A. in Milan

1975

1983

1986

2005 Transition to Prysmian Kabel und Systeme GmbH

1.3.5 WUPPERTAL LOCATION

The Wuppertal Cable Factory is located in the Ronsdorf district, in the south-eastern part of Wuppertal, the heart of the Bergisch region. The knife and blade city of Solingen and the city of Remscheid, known for its industrial culture in the tool-making sector, are in the immediate vicinity.

The factory is embedded in a residential area. The Wuppertal-Ronsdorf railway station is within walking distance to the east. To the north-east lies a small wooded area, through which the Blombach stream flows. To the south-west of the cable factory, the Ronsdorf reservoir with its adjoining recreational area is approx. 2 km away. The Ronsdorf town centre is about 1 km to the west. Major cities such as Cologne (50 km), Düsseldorf (40 km), and Essen (40 km) are easily accessible thanks to the excellent motorway connections.

The products manufactured at the Wuppertal-Ronsdorf site are used in wind turbines, automobiles, aircraft, high-speed trains, crane systems, container port terminals, and in mining and tunnelling. Additionally, the site houses the sales divisions for industrial and plant engineering (OEM), automotive (AUT), and high-voltage cables and systems (HSI). It also includes the Research and Development (R&D) department for energy cables and automotive, as well as the Technical Sales Support (TSS) division. The R&D laboratory in Wuppertal meets the international ISO/IEC 17025 standard and is accredited.

THE MAIN PRODUCT GROUPS



- Cables and cable systems including assembly and C-parts management for the wind energy sector
- Standard and harmonised rubber cables, as well as special rubber cables for high-voltage and medium-voltage applications in mining and tunnelling as well as in storage and conveyor technology
- Flexible special cables up to 150kV, such as Feltoflex RC, for offshore applications (transformer platforms)

ENERGY AND WATER
CONSUMPTION (Data for FY 2023)

10,570 GWh

GAS 1,227,079 m³

WELL WATER **4,668** m³

FRESH WATER

30,804 m³

wastewater (indirect discharge) 28,375 m³

Prysmian Kabel und Systeme GmbH Nibelungenstraße 85 42369 Wuppertal





HISTORICAL DEVELOPMENT OF THE WUPPERTAL-RONSDORF LOCATION

1874	Founding of the ribbon factory Carl Reinshagen and Heinrich Hüttenhoff	2000	The cable company Draka Deutschland acquires the Cologne-based company Felten
1883	Start of production of braided rubber threads and copper wires		& Guilleaume (rubber cable production and distribution), a subsidiary of the NKT cable group
1887	Start of production of telephone cords		group
1920	The company DRAKA from Amsterdam joins as a shareholder	2011	Merger of the three companies at the Ronsdorf site: Draka Deutschland GmbH, Draka
1925	Establishment of a branch in Wuppertal-Barmen for radio headphone cords		Industrial Cable GmbH, and Draka Automotive GmbH become Draka Cable Wuppertal GmbH
1927	Start of marine cable production		GINDH
1929	Launch of a new production line for automotive cable harnesses	2011	Merger of Prysmian and Draka factories to form the Prysmian Group
1933	Acquisition of Kabelwerk Barmen AG and Kabelwerk Nassau	2014 2018	Merger of Plants 1 and 2 Certification of the factory according to IATF
1935	Renaming of the company Reinshagen to		16949
	Kabelwerke Reinshagen GmbH	2024	Global rebranding to Prysmian
1939	A large part of the premises of Ronsdorf Ziegelwerke is purchased by Kabelwerk Reinshagen		
1945	Production of cables for mining and the Deutsche Reichsbahn (German Railways)		
1951	Acquisition of Kabelwerk August Koeck in		

TRANSPORT CONNECTIONS



Berlin and the company Doka in Neumarkt

The former site of Ronsdorf Ziegelwerke is

redeveloped in various stages as Reinsha-

Kabelwerk Wagner, Höhn Kabel, Kabelwerk

Reinshagen, and the Berlin cable factory are integrated into the new company Draka

Deutschland GmbH & Co. KG in Wupper-

/ Upper Palatinate

gen's Plant 2

tal-Ronsdorf

1970

Motorway A1 (3 km) Motorway A46 (13 km)



Wuppertal Central Station (8 km)



Cologne Airport (58 km) Düsseldorf Airport (48 km)

1.3.6 NUREMBERG / COLOGNE LOCATION

The Nuremberg cable factory is located in the Altenfurt district in the south-east of the city. The company premises are separated from the neighbouring residential area by a small green space. The Südklinikum hospital and the Franken shopping centre are in the immediate vicinity. Water for cooling purposes is supplied from an on-site well. At the Nuremberg site, plastic-insulated copper

cables are manufactured. Customers can choose from a wide range of plastics and colours for the outer sheaths. Halogen-free, flame-retardant materials are predominantly used. Additionally, the site houses the Research and Development department for Multimedia Solutions (R&D MMS).

TRANSPORT CONNECTIONS



Motorway A9 (3 km) Motorway A6 (3 km)



Nuremberg Airport (15 km)



Nuremberg Central Station (10 km)

Draka Comteq Germany GmbH & Co. KG Wohlauer Straße 15 90475 Nuremberg

Cable factory

THE MAIN PRODUCT GROUPS



Data transmission cables



Coaxial cables



Special cables

ENERGY AND WATER CONSUMPTION

(Data for FY 2023)

ELECTRICITY

6,093 MWh

GAS

244,685 m³

WELL WATER

28,487 m³

FRESH WATER

1,869 m³

WASTEWATER (INDIRECT DISCHARGE)

1,869 m³

HISTORICAL DEVELOPMENT OF THE NUREMBERG LOCATION

1958 F&G Cable Factory Nuremberg1982 Philips Communication Industry AG

1993 Nokia Cables1997 NK Networks

1999 Draka Comteq Germany GmbH & Co. KG2011 Merger of Prysmian and Draka factories to form the Prysmian Group

2024 Global rebranding to Prysmian



The sales office for the MMS factory in Nuremberg is located in the Cologne-Mülheim district, not far from the Delbrück motorway exit (A3).

The building was constructed in 1989, just around 200 metres from the historic site of F&G Carlswerks AG. It is situated on the edge of a new industrial area, which adjoins a green space.

From this office, Germany and several international regions are served. The product range includes all products manufactured in Nuremberg and at several other international MMS production sites.

At present, only the top floor is rented, which is used as office space.

Draka Comteq Germany GmbH & Co. KG Piccoloministraße 2 51063 Cologne



Sales

1.4 DOCUMENTED INFORMATION

Based on the management policy, this manual serves to describe the Integrated Management System and document responsibilities and accountabilities for business processes. In addition to introducing the company, it includes the fundamental regulations for the applied processes, procedures, and workflows. Furthermore, it serves as a guideline for procedural instructions, operational documents, and other records where processes, procedures, and measures are detailed. All supervisors are responsible for ensuring that the contents of the manual are communicated to employees.

Procedural instructions contain overarching regulations and process descriptions (workflows), while operational documents provide specific internal

guidelines for the planning, control, inspection, and improvement of processes, from marketing to recycling. These ensure that tasks are carried out under controlled conditions.

In addition to providing specific action guidelines, the procedural instructions and operational documents also ensure that additional and industry-specific requirements according to IATF 16949 and/or IRIS ISO/TS 22163 are considered for the relevant locations.

All employees are required to inform the responsible supervisors of any changes in processes, workflows, and procedures, who will subsequently initiate the corresponding updates.



The newly revised term "documented information," as defined in the updated standards, is still covered at Prysmian Germany by the use of the terms "doc-

uments" and/or "records," in compliance with the content requirements.

1.4.1 CONTROL OF DOCUMENTS

Our document control ensures that the necessary valid documents are available in an organised manner, at the right time and in the right place.

Controlled documents and data refer to those that describe the functioning of all ongoing processes,

their interfaces with each other, and their interfaces with other management systems. The data is also collected to measure consumption, determine key figures, and track objectives. It may be available in paper form or stored electronically. These docu-

ments and data are created, reviewed, approved, distributed, registered, modified, and archived by the respective responsible organisational units. Document control is managed electronically using a system that is supported by appropriate software,

with clear regulations regarding editing and access rights. Electronic data availability is ensured at all relevant points within the company.

1.4.2 CONTROL OF RECORDS

Records serve as evidence of an effective occupational health and safety, quality, environmental protection, and energy efficiency management, as well as to document compliance with customer, legal, standard, quality, energy, and environmental requirements for the products supplied. This also includes the minutes from management reviews and reports from internal and external audits.

Additional quality records include:

- · Test protocols, test certificates, checklists
- Acceptance protocols
- Test reports, including those from suppliers
- · Calibration data
- · Fault summaries, statistics
- Test catalogues

Records related to energy, occupational health and safety, quality, environmental protection, and energy

efficiency particularly include site-specific annual reports and the central loss-prevention report.

Further records include:

- Annual report on dangerous goods transport
- Annual environmental protection report
- Annual occupational health and safety report
- Minutes of dangerous goods audits
- Annual radiation protection reports
- Overviews of environmentally relevant facilities
- Waste, water, and energy balances
- Records of the Occupational Safety Committee (OHSC)
- Accident analyses & reporting
- Inspection reports, inspection protocols

- Measurement protocols (e.g. emissions)
- · Training records
- Energy action plans
- Data on energy consumption

Diese Aufzeichnungen werden von den verantwortlichen Organisationseinheiten geordnet abgelegt und entsprechend den festgelegten Fristen an einem geeigneten Ort aufbewahrt. Wenn vertraglich oder gesetzlich festgelegt (z.B. für Kernkraftwerke), werden Aufzeichnungen auch externen bevollmächtigten Personen zugänglich gemacht. Die Aufbewahrungsfristen von Dokumenten und Aufzeichnungen sind geregelt.

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2.1 COMPANY PRINCIPLES

Prysmian Germany manages all organisational units of the company with agreed objectives, which are documented in annual management plans.

Monthly and annual reports are submitted within the group according to standardised guidelines.

At the beginning of each financial year, the Managing Director sets goals for occupational health and safety, quality, environmental protection, and energy efficiency management, which are an essential part of the continuous improvement process within the management system and support the overall objectives of the company.

As part of a cascading goal-setting process, subgoals are derived at the beginning of each financial year within the organisational units in the form of target programmes for occupational health and safety, quality, environmental protection, and energy efficiency management. Responsible individuals are appointed, deadlines are set, and, if necessary, the required resources are determined and approved.

The implementation of these goals is regularly reviewed and documented during meetings between the appointed individuals and those responsible.

Prysmian's CEE (Central and Eastern Europe) management policy for the certified management systems is reviewed annually by senior management as part of the review process, updated if necessary, and made available on the internet to interested parties

2.2 ORGANISATIONAL STRUCTURE

This chapter describes the organisation, defines responsibilities and authorities, outlines the delegation of duties, establishes the tasks of appointed individuals, and regulates communication, data protection, and plant and information security. The fundamental principle of the organisation and its management system is the maximum delegation of responsibilities and tasks to provide flexibility for the efficient and timely fulfilment of customer requirements.

As part of their organisational responsibility, the Managing Director has the duty to organise the company comprehensively in such a way that only faultless and safe products are brought to market.

Organisational Structure:

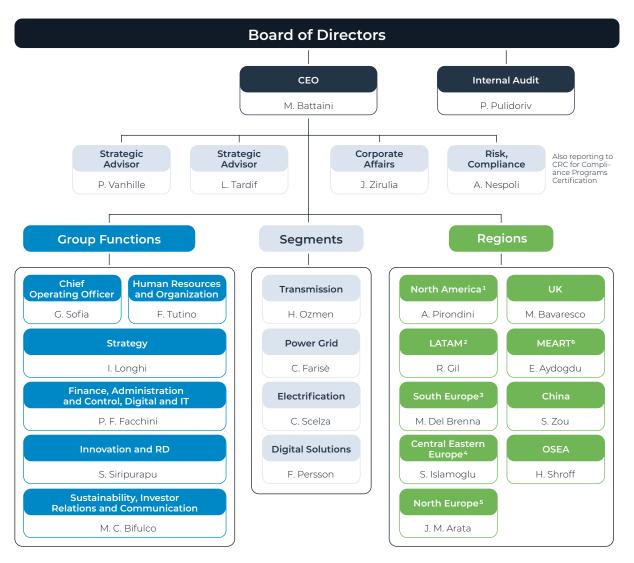
MANAGING DIRECTOR

FACTORIES

SALES DIVISIONS

CENTRAL DEPARTMENTS

Prysmian Organisational Chart*



- * The organisation chart presented reflects the organisational structure in January 2024.
- ¹ 1. NORTH AMERICA: Canada, USA.
- ² LATAM: Argentina, Brazil, Central America, Chile, Mexico, Peru, Colombia, Ecuador.
- ³ SOUTH EUROPE: Belgium, France, Italy, Portugal, Spain, Tunisia, Côte d'Ivoire and Angola.
- ⁴ CENTRAL EASTERN EUROPE: Austria, Czech Republic, Hungary, Germany, Romania, Slovak Republic, Poland.
- ⁵ NORTH EUROPE: Estonia, Finland, Norway, Denmark, Sweden, The Netherlands.
- ⁶ MEART: Middle East, India, Africa, Russia, Turkey. Nordamerika: Kanada, USA.

The organisational chart is updated as needed, at least once a year, and issued as a controlled document. The organisational charts and task assignments of the sales divisions, factories, and central departments are subject to the same requirements. The detailed processes for the management of occupational health and safety, quality, environmental protection, and energy efficiency in the sales divisions, factories, and central departments are described and governed by operational-level documents.

The person responsible for the Integrated Management System (occupational health and safety,

quality, environmental protection, and energy efficiency) reports directly to the Managing Director. Together with the quality, energy, and environmental protection officers, and the occupational health and safety professionals from the organisational units, he or she addresses the tasks involved in the further development of the Integrated Management System (IMS).

Coordination with the Prysmian S.p.A. sector is carried out through the Chief Operating Officer (see organisational chart above).

Prysmian Locations in Central & Eastern Europe

GERMANY

Prysmian Kabel und Systeme GmbH Alt Moabit 91d I 10559 Berlin Headquarters & sales office

Prysmian Kabel und Systeme GmbH Nibelungenstraße 85 I 42369 Wuppertal Production site (energy cables)

Prysmian Kabel und Systeme GmbH Austraße 99 I 96465 Neustadt Production site (energy cables)

Prysmian Kabel und Systeme GmbH Siemensplatz 1 I 19057 Schwerin Production site (energy cables)

Draka Comteq Germany GmbH & Co. KG Wohlauer Straße 15 I 90475 Nuremberg Production site (MMS)

Draka Comteq Germany GmbH & Co. KG Piccoloministraße 2 I 51063 Cologne Sales office (MMS)

Norddeutsche Seekabelwerke GmbH Kabelstraße 9-11 I 26954 Nordenham Production site (submarine cables)





AUSTRIA

Prysmian OEKW GmbH Lemböckgasse 47a I 1230 Vienna Sales office



2.2.1 MANAGEMENT

The companies of Prysmian Germany are German subsidiaries of PRYSMIAN S.p.A. in Milan, focused on the development, manufacturing, and distribution

of cables, wires, and systems. The Managing Director holds the corporate responsibility for these activities.

AREAS OF RESPONSIBILITY:

- Definition and implementation of management policies, objectives, and planning guidelines
- Implementation of the management manual
- Ensuring customer requirements and expectations are met
- Approval of market strategy, pricing policy, and product range
- Compliance with legal and other regulations

Maintenance of the management system with clear organisational structures, responsibilities, and delegation of duties

Setting target programmes for the continuous improvement of the management system

Provision of necessary resources for performance enhancement and continuous improvement across all organisational units

Conducting the management review

The Managing Director coordinates business strategies, ensures their implementation within the individual organisational units, and represents the companies both externally and internally.

Within the scope of his overall responsibility, he also holds product responsibility. This includes responsibility for product safety and safety-compliant product design. Furthermore, product responsibility must also be understood in terms of the Circular Economy Act. The product manager is authorised to delegate partial responsibilities, e.g. in the areas of development, design, production, and sales.

The Managing Director delegates partial responsibilities for the individual processes in the areas of quality, energy efficiency, environmental protection, and occupational health and safety management to the heads of factories, sales divisions, and central

departments. However, this does not absolve him of his overall responsibility. The heads are supported in these tasks by quality, energy, and environmental protection officers, as well as safety officers appointed by them.

For the control of non-conforming products, the Managing Director appoints "Technical Product Managers" and their deputies, granting them authority. In the event of deviations from the specifications, they decide on the necessary measures to be taken.

2.2.2 OCCUPATIONAL HEALTH AND SAFETY, QUALITY, ENVIRONMENTAL PROTECTION, AND ENERGY EFFICIENCY MANAGEMENT

The Central Department for Occupational Health and Safety, Quality, Environmental Protection, and Energy Efficiency Management (QHSE) is responsible for supporting the organisational units in the implementation of a unified and effective management system for health and safety, quality, en-

vironmental protection, and energy efficiency. To ensure long-term business success, it is important to promote process thinking and intensify the involvement of employees, as well as customers and suppliers, in the continuous improvement process.

KEY TASKS:

- Coordination, further development, and monitoring of the occupational health and safety, quality, environmental protection, and energy efficiency management system in collaboration with the Q and HSE teams
- Documentation of the management system (manual, procedural instructions, overarching regulations)
- Monitoring the effectiveness and suitability of the management system (organising management reviews)
- Planning and conducting internal audits, reporting, auditor qualification and workshops, and further training measures
- External audits and certifications
- Support in the preparation of supplier self-assessment documents for our customers

- Assistance in the delegation of duties and the appointment of quality, energy, and environmental protection officers, safety officers, safety officers, and persons responsible for the transport of dangerous goods
- Support for quality, energy, and environmental protection officers, safety officers, safety officers, and persons responsible for the transport of dangerous goods
- Reporting on activities related to occupational health and safety, quality, environmental protection, and energy efficiency management



2.2.3 HUMAN RESOURCES AND ORGANISATION

The head of the Central Department for Human Resources and Organisation (HR) is responsible for the company's personnel activities, particularly in the areas of employee support, personnel planning and development, workforce deployment, recruitment, personnel reporting, personnel cost management, and remuneration systems.

ADDITIONAL TASKS: Advice on educational matters Management of training requirements Organisation of plant security Documentation and evaluation of completed trainings Travel management Apprenticeships Organisational management Organisational management Coordination of company cars

2.2.4 FINANCE, CONTROLLING

The head of the Central Department for Finance, Administration, Controlling, and Tax (CFO) is responsible for ensuring that economic, regulatory, and risk aspects are appropriately considered. The CFO is accountable for the financial controlling of costs and assets and for ensuring compliance with accounting principles.

KEY RESPONSIBILITIES: General accounting with invoice veri-**Taxation** fication Monthly, quarterly, and annual financial Supplier and asset accounting statements according to HGB and IFRS Internal accounting, inventory, and in-Planning according to group guidelines voicing (IFRS) Planning and controlling for sales units Public relations (non-technical) and orand factories ganisation of external communication Credit management and treasury



2.2.5 INFORMATION TECHNOLOGY

The head of the Central Information Technology (IT) Department is responsible for the provision, maintenance, and support of the entire information system.

The central information technology department acts as a service provider for all organisational units

in the company regarding information processing matters. It is, therefore, the point of contact for any issues related to communication technology, hardware, software, and information security.

KEY TASKS:

- Enforcement of the Prysmian-standardised practices in information technology
- Provision of hardware and software for the organisational units
- Software development, installation, and maintenance
- Hardware installation, repair, and maintenance
- Setup and operation of data lines
- Operation of the communication network

- Ensuring short response times
- Ensuring high system availability
- Conducting central data backups within the company
- Maintaining system integrity and information security
- Ensuring compliance with the requirements of the Federal Data Protection Act

2.2.6 SALES DIVISIONS

The sales divisions, along with their organisational units, are responsible for the business involving products, systems, and services, and thus serve as the direct partners of customers.



The specific tasks within these responsibilities are determined by the individual sales divisions according to their market requirements.

As part of their duties, the sales divisions are also responsible for providing instructions for the products they introduce to the market. This includes providing complete and accurate information in a clear format regarding the intended use, along with any necessary warnings about foreseeable misuse.

They also act as the point of contact for customers in handling complaints and, if necessary, are responsible for preparing product recalls (implementing immediate measures in case of safety issues). The decision to initiate a product recall is made by the Managing Director.

Product monitoring by the sales divisions involves observing product performance across different applications and ensuring feedback for potential product adjustment processes.

2.2.7 RESEARCH, DEVELOPMENT, AND ENGINEERING

The Central Research and Development (R&D) Department is responsible for product, material, process, and testing technology related to the creation, maintenance, and strategic development of existing and innovative products.

KEY TASKS:

- Development of formulations for core insulation and outer sheaths
- Participation in national and international regulations
- Selection and development of new materials for cables and systems
- Involvement in professional and standardisation committees
- Environmentally friendly product design
- Technical marketing / application engineering
- Specification of product and design data
- Evaluation of complaints
- Specification of manufacturing technologies
- Collaboration with scientific institutes and universities
- Manufacturing process support
- Development and technical support for patents

Testing of new products

- Project management
- Development of new testing techniques and procedures

Additionally, any supplementary requirements from IATF 16949 are taken into account.

The results from the implementation of these tasks are made available to the organisational units in an appropriate manner.

The heads of the central departments for research, development, and engineering hold technical product responsibility. Furthermore, they are accountable for development and design.

These partial responsibilities delegated by the Managing Director are regulated and documented.

2.2.8 PURCHASING

The Central Purchasing Department (PU) is responsible for all purchases and procurement activities. The head of the department, along with the purchasing organisations, is responsible for the

implementation of purchasing and procurement tasks. Specific procurement requirements, such as those from IATF 16949, are taken into account location-specifically.

PURCHASING AND PROCUREMENT TASKS:

- Identification, selection, and evaluation of suppliers; supplier development
- Negotiating claims with financial implications in cases of defective deliveries and services

Requesting quotations

- Maintaining conditions in the SAP system
- Negotiation and setting of terms, particularly pricing, payment, and delivery conditions
- Approval and issuance of purchase orders, framework agreements, and contracts

2.2.9 PRODUCTION AREAS

Prysmian Germany operates six production sites: Neustadt bei Coburg (FM N), Schwerin (FM S), Wuppertal (FM W), Nuremberg (FM Nb), and Nordenham (NSW). These sites handle cross-location coordination tasks, including investments, special maintenance projects, methods, and productivity.

Each production site is managed by a factory manager, who is responsible for production, quality, maintenance, occupational health and safety, environmental protection, and energy efficiency.

The detailed responsibilities of these areas can be found in the organisational charts and task assignments of the respective factories.

Additionally, the factory managers hold manufacturing responsibility for the products made at their respective sites.

2.2.10 LOGISTICS

The Central Logistics Department (LOG) is responsible for production planning, warehousing, and scheduling across different company divisions and production sites. This includes the implementation and optimisation of administrative systems related

to the physical flow of goods.

Additionally, the department is responsible for fulfilling key activities such as delivery reliability and inventory optimisation.

KEY TASKS OF LOGISTICS:

- Optimisation and monitoring of on-time customer delivery (both internal and external)
- Definition and optimisation of interfaces for logistics workflows between business units, factories, and central departments
- Allocation of distribution requirements to production sites, taking into account production capacities and inventory levels
- Ordering and delivery within the framework of intercompany business
- Setting performance parameters for customer deliveries by service providers (both internal and external)
- Development and implementation of new or improved packaging and transportation methods

- Monitoring logistics costs related to storage and dispatch of both own and supplied products
- Defining and monitoring optimised inventory levels
- Implementation and coordination of the logistics requirements and objectives of Prysmian S.p.A in Milan
- Compliance with customs laws and export control requirements
- Coordination of export-specific workflows

Furthermore, any supplementary requirements from ISO/TS 16949 are considered, including:

Planning and demand forecasting for raw materials used in compound and cable production

2.2.11 SITE AND INFORMATION SECURITY, DATA PROTECTION

Within Prysmian Germany, two areas of security are distinguished:

SITE SECURITY

(Protection of people and goods)

The head of the Central Human Resources and Organisation Department is responsible for site security, while the head of the Central Information Technology Department is responsible for information security.

INFORMATION SECURITY

(Protection of information and know-how)

To support compliance with these requirements and the requirements of the Federal Data Protection Act, a data protection officer has been appointed. The current status of data protection is documented through vulnerability analyses.

2.3 AUTHORISED REPRESENTATIVES FOR OCCUPATIONAL HEALTH AND SAFETY, QUALITY, ENVIRONMENTAL PROTECTION, AND ENERGY EFFICIENCY MANAGEMENT

2.3.1 ASSIGMENT OF DUTIES IN OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION

Responsibility for occupational and environmental protection lies with the Managing Director who assigns the duties related to environmental protection,

dangerous goods transport, and occupational safety to site managers, heads of central departments, and heads of sales divisions.

ORGANISATIONAL REGULATIONS AT ALL LEVELS OF A SITE:

- The site manager, in his function as factory manager, delegates the tasks and responsibilities for environmental protection, dangerous goods transport, and occupational health and safety to the heads of subordinate organisational units.
- The environmental protection officer and/ or the safety officer initiates updates to the assignment of duties in the event of personnel or organisational changes.
- At the beginning of the financial year, QHSE determines the audit plan with the environmental protection officer, safety officers, and the responsible quality officers and coordinates the dates with the responsible site managers and heads of the central departments.
- Based on the audit results, targets, programmes, and measures are determined.

- The site manager inspects the relevant departments at least every six months as part of environmental and occupational safety inspections.
- These inspections are attended by the responsible supervisors, maintenance managers, and relevant authorised representatives, including the occupational physician and works council.
- Complaints and agreed improvement measures are documented by the operators, and the deadlines are monitored.
- The organisation and documentation of the inspections are handled by the environmental protection officer or the safety officer.

The authorised representatives are listed in the "Occupational and Environmental Protection" responsibility matrix. This matrix is regularly updated

by the Central QHSE (Quality, Health, Safety, and Environment) Department.

2.3.2 AUTHORISED REPRESENTATIVE FOR THE INTEGRATED MANAGEMENT SYSTEM (IMS)

The authorised representative for the Integrated Management System (covering occupational health and safety, quality, environmental protection, and energy efficiency) is appointed by the Managing Director and supports the Managing Director in managing these areas. The IMS representative also heads the Central QHSE Department.

the management policy. The IMS representative must also ensure that the requirements of the following standards and regulations are fulfilled, maintained, and continuously applied: DIN EN ISO 9001, KTA 1401, DIN EN ISO 14001, DIN EN ISO 50001, IATF 16949, DIN ISO 45001, and ISO/TS 22163 (IRIS).

The responsibilities include the implementation and both internal and external communication of

FURTHER TASKS OF THE IMS REPRESENTATIVE:

- Co-design of the strategy for occupational health and safety, quality, environmental protection, and energy efficiency, and further development of the Integrated Management System
- Creation and maintenance of the management manual
- Organisation and evaluation of the management system
- Monitoring of objectives and corrective measures
- Organisation of the audit programme
- Monitoring the handling of deviations and findings from internal and external audits

- Representation on fundamental questions regarding the management system
- Coordinating matters related to occupational health and safety, quality, environmental protection, and energy efficiency management
- Definition of necessary criteria and methods to ensure efficient control of the energy efficiency management system and related processes
 - Reporting on the company's energy performance and the performance of the energy efficiency management system to top management for review, including recommendations for improvements

The representative for the Integrated Management System reports directly to the executive board (executive/operations meeting).



2.3.3 QUALITY REPRESENTATIVE (QR)

The heads of the organisational units are supported by a designated quality representative in fulfilling the tasks related to the implementation of the quality management system. To this end, the heads provide their quality representatives with the necessary authorisations.

KEY TASKS:

- Further development and documentation of the management system within their area of responsibility, in coordination with the central QHSE department (Q-Team)
- Monitoring the effectiveness of the management system
- Advising and supporting the organisational unit in the implementation of the management system
- Tracking the achievement of quality objectives
- Contribution to the development and maintenance of the management manual and overarching procedures

- Reporting to the head of the organisational unit
- Coordination of environmental management issues (if environmental relevance exists)
- Conducting internal and, if necessary, external audits
- Monitoring the processing of deviations/ findings from internal and external audits
- Further development of self-responsible quality assurance (SQA) in the workplace

2.3.4 ENVIRONMENTAL PROTECTION OFFICER (EPO)

The factory managers are supported by the environmental protection officer in implementing the environmental management system.

In accordance with legal and internal regulations, the factory managers delegate duties and tasks to the appointed environmental protection officer, granting the necessary authorisations.

The area of responsibility also includes the facilities and staff of the central departments located at the respective site.

KEY TASKS:

- Further development and documentation of the management system within their area of responsibility, in coordination with the Central QHSE Department (HSE team)
- Monitoring the effectiveness of the management system
- Contribution to the development and maintenance of the management manual and overarching procedures
- Training company employees on environmental topics
- Providing statements and, if necessary, preparing risk assessments for environmental impacts in projects
- Negotiating with regulatory authorities on all matters related to operational environmental protection
- Advising and supporting organisational units in factories and central departments in the implementation of the environmental management system

- Monitoring the achievement of environmental targets
- Participating in the creation of the environmental management programme
- Annual reporting on realised and planned measures
- Conducting internal environmental audits in coordination with the responsible quality representative
- Collaborating and coordinating with legally appointed or designated personnel
- Organising and documenting environmental protection (UWS) inspections
- Environmental reporting to the factory manager (factory meeting)

2.3.5 ENERGY MANAGEMENT OFFICER (ENMR)

KEY TASKS:

- Coordination and moderation of the energy team
- Initiation of the annual analysis and assessment of energy aspects
- Ensuring an energy assessment at specified intervals, as well as following significant changes in plants/sites, facilities, systems, and processes
- Derivation and monitoring of the annually updated energy targets at site level
- Internal communication (notices, information, etc.) at site level
- Monitoring legal changes via the legal register and evaluating compliance with legal requirements at site level
- Communication of legal obligations to site management and responsible departments at site level

- Monitoring internal requirements in collaboration with other authorised representatives at the site
- Monitoring the implementation and effectiveness of corrective measures from audits, in coordination with the authorised representatives at site level
- Overseeing key internal energy-related processes
- Maintaining site-specific energy management documentation by reviewing and coordinating the relevant areas, if necessary, in collaboration with other authorised representatives
- Promoting employee awareness of energy policy and energy targets at site level

2.3.6 SAFETY OFFICER (SO)

It is the legal duty of the factory managers to identify and assess all work-related hazards for employees in their area. To assist in this task, they appoint a safety officer (or a safety engineer), who advises and supports them. The area of responsibility also includes the facilities and staff of the central departments located at the respective site.

KEY TASKS:

- Inspection of operating facilities, machinery, and equipment
- Monitoring the achievement of occupational safety objectives
- Proposing measures to eliminate deficiencies
- Providing statements and, if necessary, preparing risk assessments for projects
- Ensuring the implementation of proposed measures
- Preparing annual reports (accident statistics, sick days, etc.)
- Investigating workplace accidents
- Organising and documenting occupational safety inspections
- Identifying accident prevention measures
- Collaborating and coordinating tasks
- Promoting safety-conscious behaviour among employees
- Collaborating and coordinating tasks with legally appointed or designated personnel
- Ensuring the use of personal protective equipment

Furthermore, the safety officer advises the factory managers on decisions related to planning, procurement, and evaluation concerning occupational health and safety aspects. The safety officer is supported by safety representatives (SR) in each area.

2.3.7 FIRST AID RESPONDERS AND FIRE SAFETY ASSISTANTS

At all Prysmian Germany sites, trained first aid responders and fire safety assistants are appointed

and deployed. They are responsible for providing emergency care and first aid on all shifts.

2.4 INTERNAL AND EXTERNAL COMMUNICATION

As part of the commitment to continuous process improvement involving all employees, regular meet-

ing panels/committees have been implemented.

THE MEETING COMMITTEES INCLUDE: Executive meetings (management level) Factory meetings / SOP meetings (production sites) Occupational health and safety and environmental protection committees General staff meetings (all employees at a site) Daily meetings, etc. Quality meetings

These meetings serve to inform employees, analyse the strengths and weaknesses of the business environment and the management system, and

to formally document corrective, preventive, and precautionary actions.

The works council is informed and involved in decision-making on the following topics, among others:

OCCUPATIONAL SAFETY

TRAINING AND QUALIFICATION

STRUCTURAL CHANGES

ORGANISATIONAL CHANGES

The necessary communication and information are provided via a computer-supported information system, where each user of this system is required to retrieve the information independently.

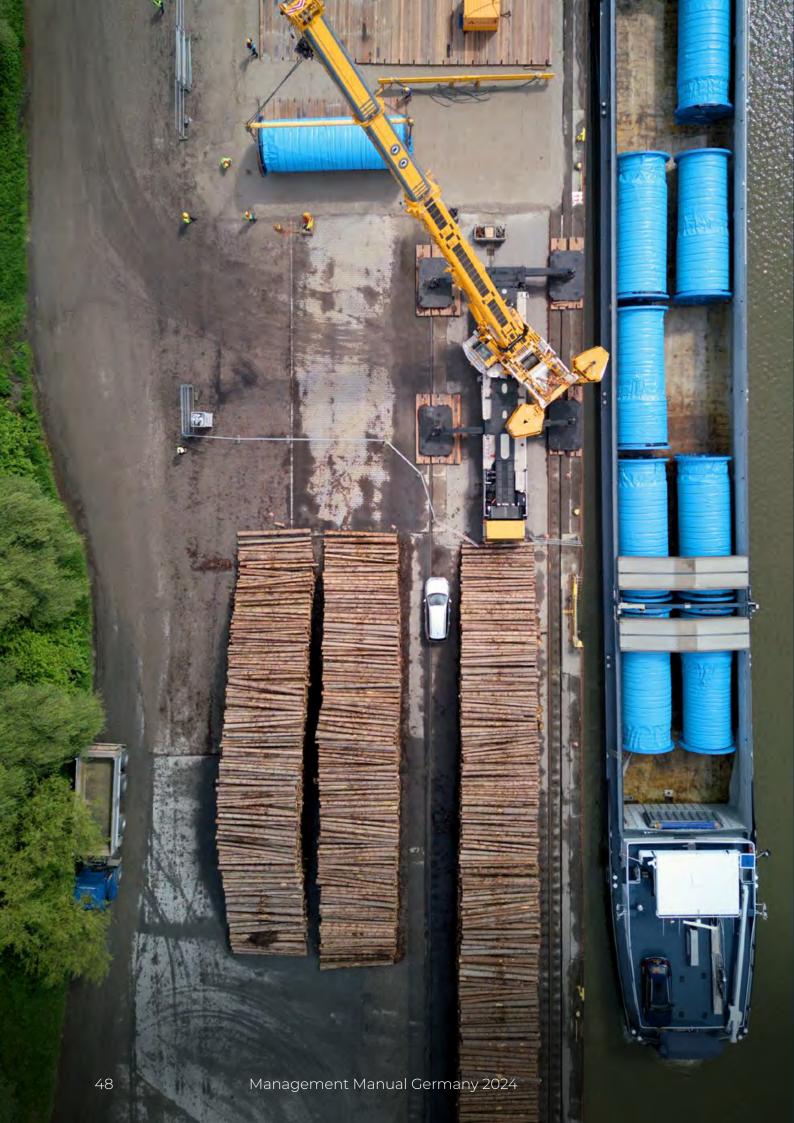
For employees without access to the computer-supported information system, the responsibility for providing information lies with their direct supervisor. Additional communication methods include employee newsletters.

The respective environmental protection officer serves as the contact person for local environmental

authorities at each site, and the safety officer acts as the liaison with the relevant employer's liability insurance association.

Energy management and data related to energy performance are communicated internally. There is no external communication regarding energy performance or significant environmental aspects. Information to external interested parties or press releases is provided only by a person appointed and authorised by the executive management.





3 PLANNING

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3.1 RISK AND OPPORTUNITY MANAGEMENT

Risks and opportunities are identified as part of the analysis of the expectations and needs of interested parties (context).

Furthermore, each process within the integrated management system is analysed in accordance with standardised rules of procedure.

Further risks and opportunities are considered within the following frameworks:

feasibility check in the quotation process

Risk assessment

Product development

Environmental aspects

To assess the market's opportunities and threats, a SWOT analysis is conducted.

in order to maintain and improve the status quo.

The management and process owners are responsible for minimising risks and leveraging opportunities

The assessment of effectiveness and the need for action is conducted during the annual management review.



3.2 RISK ASSESSMENTS

To identify potential hazards for Prysmian Germany employees, operational activities are comprehensively analysed by the safety officer, based on applicable laws (such as the Occupational Safety and Health Act - ArbSchG), and involving stakeholders, users, and the works council.

The analysis is conducted with regard to:

Work environment

Operating and auxiliary materials

Disruptions and emergencies

Legal requirements

External contractors

From this, potential and existing hazards are identified and assessed. Based on this hazard assessment,

protective measures are determined.

Determination of protective measures with regard to:

Technical measures

Organisational measures

Personal protective equipment (PPE)

Protective and control measures

3.3 EVALUATION OF ENVIRONMENTAL ASPECTS

All areas and activities (including applicable products and services) of Prysmian Germany where environmental aspects and impacts (including energy consumption) could be relevant are recorded in an overview and are continuously monitored.

The management of environmental aspects is closely related and interconnected with:

Control of regulations, laws

Waste and wastewater management

Handling of installations with water-polluting substances

Handling of hazardous substances

Collection of resource data

The identification and evaluation of environmental aspects are considered part of risk and opportunity management (preventive measures) and may result

from consequences derived from environmental incidents.

3.4 ENERGY PLANNING

In order to continuously influence energy efficiency and consumption, activities are aligned accordingly already at the planning stage. Energy planning is conducted in accordance with the energy policy and the measures aimed at the continuous improvement of energy performance.

The following criteria for each consumer are considered and analysed by the energy team:

Share of total consumption (%)

Effort

Influenceability

3.5 EMERGENCY PREPAREDNESS AND RESPONSE

To ensure effective emergency preparedness, potential, unavoidable sources of accidents are identified and regularly reviewed. This process is documented and incorporated into further planning. Potential environmental impacts from accidents are identified, recorded in the environmental register at the respective sites, and evaluated.

In the event of deviations from the intended operation of the plant – i.e. plant malfunctions or accidents resulting in emissions into the environment – immediate actions are taken to minimise damage to humans and the environment. This applies to both minor incidents and more significant events. The responsible environmental protection officer must be notified immediately.

Measures in the event of environmental incidents, as well as the alerting of key personnel and responsible parties, are documented in the fire and disaster protection plan, the company disaster protection organization (CDPO), and other internal regulations at the sites. Additionally, emergency response measures and guidelines for behaviour in the event of accidents are included in the hazardous substance information sheets. In the area of occupational health and safety, preventive measures are derived and implemented based on the

results of internal and external inspections. These preventive measures are based on economically viable and technically feasible criteria, depending on the potential risk to persons.



3.6 MANAGEMENT PROGRAMMES AND OBJECTIVES

Key performance indicators (KPIs) are defined for the processes of the Integrated Management System, supported by annual, measurable, and accountable objectives to track performance.

Prysmian Germany manages all organisational units of the company with agreed objectives, which are documented in annual management plans.

Monthly and annual reports are submitted within the group according to standardised guidelines.

At the beginning of each financial year, the Managing Director sets goals for occupational health and safety, quality, environmental protection, and energy efficiency management, which are an essential part of the continuous improvement process within the management system and support the overall objectives of the company.

As part of a cascading goal-setting process, subgoals are derived at the beginning of each financial year within the organisational units in the form of target programmes for occupational health and safety, quality, environmental protection, and energy efficiency management. Responsible individuals are appointed, deadlines are set, and, if necessary, the required resources are determined and approved.

The implementation of these goals is regularly reviewed and documented during meetings between the appointed individuals and those responsible.

Prysmian's CEE (Central and Eastern Europe) management policy for the certified management systems is reviewed annually by senior management as part of the review process, updated if necessary, and made available on the internet to interested parties.

3.7 PLANNING OF CHANGES

The following criteria are taken into account when changes to the Integrated Management System are required:

Purpose of the changes and their potential consequences

Assignment and reassignment of responsibilities and authorities

Integrity within existing processes

Availability of resources



4 RESOURCE MANAGEMENT

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4.1 PRINCIPLES

At Prysmian Germany, the resources required for implementing the policies, strategies, and objectives related to the management system are identified and made available in a timely manner.

These resources include, among others, employees, suppliers, necessary information, infrastructure, the work environment, and the required financial resources.

Particular consideration is given to:

- Efficient and timely provision of resources (customer satisfaction)
- · Realisation and support facilities (material resources)
- Intellectual property/expertise (immaterial resources)
- Clear organisational structures (structural and process organisation)
- Resources and mechanisms to promote innovation and continuous improvement of processes, as well as energy efficiency
- Development of employee capabilities (training, education)
- · Efficient use of natural resources and energy
- Measures for occupational health and safety and workplace design
- Future resource planning



4.2 HUMAN RESOURCES

The constantly increasing market demands, rapid technological advancements, and the need to consider occupational health and safety, quality, environmental protection, and energy efficiency make it essential to continuously enhance employees' knowledge through appropriate training and education, keeping them up to date with the latest developments.

This ensures that employees have the necessary qualifications to meet the quality requirements of our processes, products, and services while taking into account environmental aspects, energy efficiency, and compliance with occupational health and safety standards.

4.2.1 GENERAL

Each supervisor is responsible for:

- Selecting and assigning only those employees who are suitable and qualified for the respective tasks
- Initiating the necessary training or education for their employees
- Ensuring compliance with legal, company-internal, or other regulations regarding employee qualifications



4.2.2 TRAINING, COMPETENCE, AND AWARENESS

The necessary training measures begin as early as the hiring of new employees, such as through an initial employee meeting or a personalised onboarding plan.

Every employee must be informed about their responsibilities by their supervisor, particularly within the framework of the management system.

The supervisor must regularly assess the qualifications of their direct reports with regard to their respective tasks and determine whether and to what extent additional training or education is required. The appraisal interview is a suitable tool for this purpose.

If specific tasks require legal, company-internal, or other regulations regarding employee qualifications, the supervisor must ensure that:

- · Appropriate employees are recruited or trained
- Certificates or confirmations of qualification are available
- Any required recertifications are completed in a timely manner
- Only employees who meet these qualifications perform the relevant tasks



The onboarding, training, and information provided to employees are documented through records. External training measures are evidenced by participation certificates or qualifications, which must be submitted to the HR department.

In the fourth quarter of the current financial year, the supervisor must prepare a training or education plan for their employees for the upcoming financial year and coordinate this with the relevant HR department. Employees are encouraged to make

suggestions for their own professional development.

Employees are informed about relevant educational programmes by their supervisors. Upon request, each employee can receive an up-to-date printout of their personal training record, for which they are responsible for keeping updated.

Tasks, appointment, and professional qualifications within the Integrated Management System (occupational health and safety, quality, environmental

protection, and energy efficiency): The technical advice provided to the responsible parties at the sites, as well as the monitoring of legal or internally established requirements, is carried out by the appointed representatives. These representatives are formally appointed in writing by the site manager, with specific tasks and responsibilities outlined. The prerequisites for appointing a representative include both personal suitability and meeting the legally required qualification profile.

Training and its documentation in occupational health and safety, and environmental protection, including energy topics: The site's training programme aims not only to further the professional development of representatives but also to familiarise all employees involved in environmentally relevant activities with environmental protection legislation and internal regulations. These training sessions are designed to foster understanding and

responsibility for environmental protection issues. The selection of appropriate seminars is made by the management representative in consultation with the relevant HR department (see table).

Training in occupational health and safety is typically based on courses offered by the employers' liability insurance association. The safety officer, in consultation with the supervisors responsible, selects the appropriate courses.

EMPLOYEE	TYPE AND FREQUENCY OF TRAINING
Supervisors with responsibility letters for environmental protection, hazardous goods transportation, and occupational health and safety working in the production sector, as well as maintenance staff with environmental protection duties	Seminars/events on industrial environmental protection topics typically every 3 years
Supervisors with delegated responsibilities for environmental protection, hazardous goods transportation, and occupational health and safety working in non-production areas	Seminars/events on industrial environmental protection topics typically every 5 years
Supervisors, employees with environmentally relevant tasks, and safety officers	Annual training on legal requirements and internal regulations
Sales employees with environment-related tasks	Written information and notifications, along with targeted training courses
Environmental protection officers, energy management officers, and other authorised environmental officers, safety officers, safety representatives, coordinators, and first aid responders	Regular participation in internal and external re- fresher and advanced training courses
Authorised persons and other responsible individuals in hazardous goods transportation	Participation in external training courses at least every 3 years

4.2.3 KNOWLEDGE MANAGEMENT

At Prysmian Germany, attention is given annually to ensuring that the knowledge of experienced employees, insights from projects, and experience from identified errors are shared within teams and managed as lessons learned.

hin teams and expertise that is reflected in the qualification matrix.

The annual training needs assessment aims to

ensure that the necessary knowledge is broadly

available based on the current level of employee

In addition to these internal sources, knowledge exchange is actively maintained with universities, at conferences, and with customers and external providers.



4.3 INFRASTRUCTURE

The necessary manufacturing and testing equipment will be identified, provided, and maintained to ensure optimal product quality. This includes the resources required for operations at production and

administrative sites, such as necessary equipment, hardware, software, and the organisation and provision of supporting services.

The primary focus areas are:

- Systematic management and control of process flows, including production procedures and production equipment
- Measuring and testing equipment

This is carried out in compliance with occupational health and safety and environmental protection regulations, as well as special specifications, legal requirements, operating instructions, and maintenance regulations.

The production and testing processes are planned, tested, approved, and periodically monitored (process validation) when results cannot be fully verified through subsequent quality testing.

Wherever possible, processes are automatically monitored and controlled. The maintenance of production equipment is scheduled based on frequency and scope according to internal requirements, and must be carried out while avoiding unacceptable environmental impacts.

Maintenance and servicing plans ensure product conformity.

4.4 MONITORING OF TESTING AND MEASURING EQUIPMENT

Monitoring and measuring equipment relevant to product quality, energy, and environmental concerns, as well as for setting up and monitoring processes in factories and ensuring compliance with environmental regulations and laws, are labelled and calibrated, measured, or monitored at specified intervals.

The responsibility for monitoring measuring equipment is established for the production sites. Appointed measurement officers assist the respective responsible person in charge.

All monitoring-relevant measuring equipment is registered in the measurement equipment inventory and marked to indicate or trace the calibration status (e.g., with a label), specifying whether they are

- · calibrated,
- measured or
- secured for measurement.

Monitoring and measuring equipment in use are requested for verification by the responsible organisational unit after the calibration interval has expired. The results of the monitoring of measuring equipment are documented and retained. In the event of a negative calibration or measurement verification result, the unit conducting the monitoring informs the organisational unit responsible for the equipment that the previous measurement must be repeated.

Monitoring and measuring equipment that is not relevant to product quality, energy, or environmental concerns is not subject to regular monitoring but is labelled accordingly.

Monitoring and measuring equipment that is damaged or suspected of having unacceptable deviations is taken out of service, and immediate inspection is initiated. The procedures established and applied within the organisational units ensure that all measuring equipment undergoes appropriate maintenance, and that handling, protection, and storage are conducted in such a way as to maintain accuracy and usability.

It is also ensured that only suitable monitoring and measuring equipment is selected and used according to their various purposes and different classes. For installations performed by service providers, the responsible organisational unit ensures that the service provider has the necessary measuring equipment required for the agreed inspections, and that this equipment is monitored and calibrated.

4.5 WORK ENVIRONMENT

Employee deployment and workplace conditions are determined and managed by Prysmian Germany in such a way that the required product quality is achieved. All applicable legal and regulatory requirements are observed to meet environmental concerns and occupational safety standards, including workplace design.

The company has appointed a safety officer and delegated occupational health and safety responsibilities to the heads of sales divisions, sites, and central departments. In cooperation with the occupational health and safety committee, they ensure a safe and appropriate work environment.

The work environments are further described in sections 1.3.1 to 1.3.6 (site descriptions), 5.1.1 (Processes and Procedures for Occupational Health and Safety, Quality, Environmental Protection, and Energy Efficiency Management), and 5.1.2 (Legal and Other Requirements).

4.6 NATURAL RESOURCES / ENERGY MANAGEMENT

The efficient use of natural resources and raw materials is already outlined in our policies and company objectives. Resource efficiency is a focal point in the determination and pursuit of objectives.

Efficient energy use is becoming an increasingly important competitive factor. By conserving resources and protecting the climate, costs are reduced, and competitiveness is enhanced. Energy efficiency is, therefore, an integral part of our corporate culture.

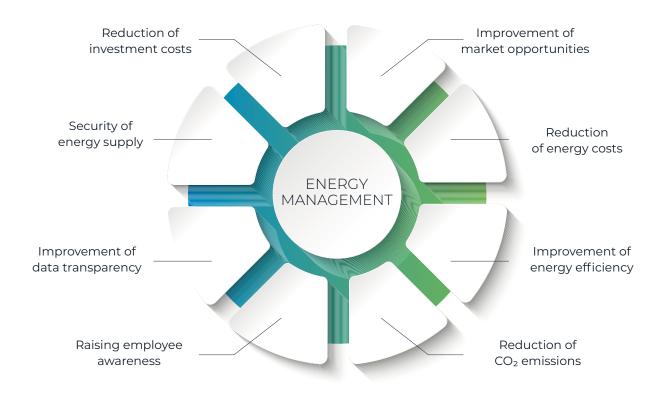
Measuring and evaluating relevant energy consumption is a core task within the company. In collaboration with specialised companies, solutions for optimising energy consumption are developed and implemented. Employees are trained and instructed in energy management. Key aspects regarding energy are described in procedural instructions.

Energy management encompasses all planned and implemented measures to ensure optimised energy use while meeting performance requirements. Energy management impacts organisational and technical processes as well as behaviours, with the

goal of reducing total operational energy consumption (including energy required for production) and the consumption of primary and secondary materials, while continuously improving the company's energy efficiency.

An Energy Management System (EnMS) is used to systematically record energy flows and serves as the basis for investment decisions aimed at improving energy efficiency.

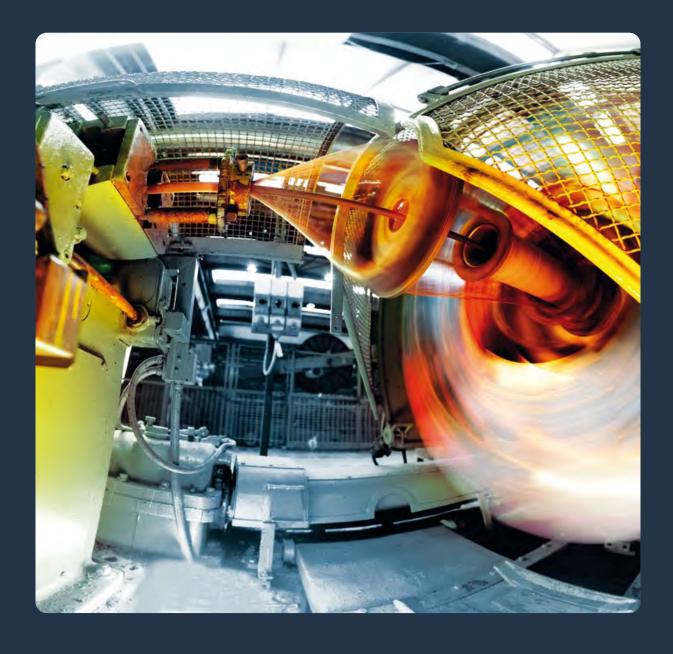
An EnMS comprises the organisational and informational structures required to implement energy management, along with the necessary tools. Through an EnMS, planning, operation, monitoring, measurement, control, correction, and regular review by management are structured and executed.



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5.1 PRODUCT REALISATION PLANNING

All realisation processes are planned with the specification and documentation of the tasks to be performed, ensuring that our products are manufactured under controlled conditions while considering environmental concerns, energy-relevant aspects, and compliance with occupational health and safety regulations.

Environmentally relevant processes are planned, documented, reviewed, and approved with the involvement of the environmental protection officer who regularly monitors these processes.

Extended requirements of IATF 16949 are also taken into account.

Energy-relevant processes are similarly monitored by the energy management officer (EnMO).

For each product to be manufactured, the processes are defined in the production and inspection documents by the organisational units responsible for order processing, production planning and control, production, quality assurance, and product preservation.

We are continuously working on improving our processes (see chapter 5).

5.1.1 PROCESSES AND PROCEDURES FOR OCCUPATIONAL HEALTH AND SAFETY, QUALITY, ENVIRONMENTAL PROTECTION, AND ENERGY EFFICIENCY MANAGEMENT

Occupational health and safety, environmental protection, and energy efficiency are crucial parts of managerial responsibilities. It is equally the duty of all employees to contribute to achieving the goals of occupational health and safety, environmental protection, and improving energy efficiency within the scope of their capabilities and in a self-responsible manner.

Management and the works council jointly pursue the goals of occupational health and safety, environmental protection, and energy efficiency, including ergonomic workplace design.

At production sites, environmental, energy, and safety aspects are identified, recorded, described, and assessed. This includes all installations, equipment, and activities relevant to soil, water, and emission

protection, as well as waste producers and the overall environmental and energy relevance of the site.

The identification, recording, description, and evaluation of environmental, energy, and safety aspects are carried out in accordance with established regulations, primarily by the responsible environmental protection officer at the site, as well as the energy management officer and safety officer. The corresponding documents are updated annually, or immediately in the event of significant changes.

The documentation is maintained in the environmental register or in plant operation logs, which are created for each environmentally relevant plant and are available either on-site at the affected facilities or with the employee responsible.

5.1.2 LEGAL AND OTHER REQUIREMENTS

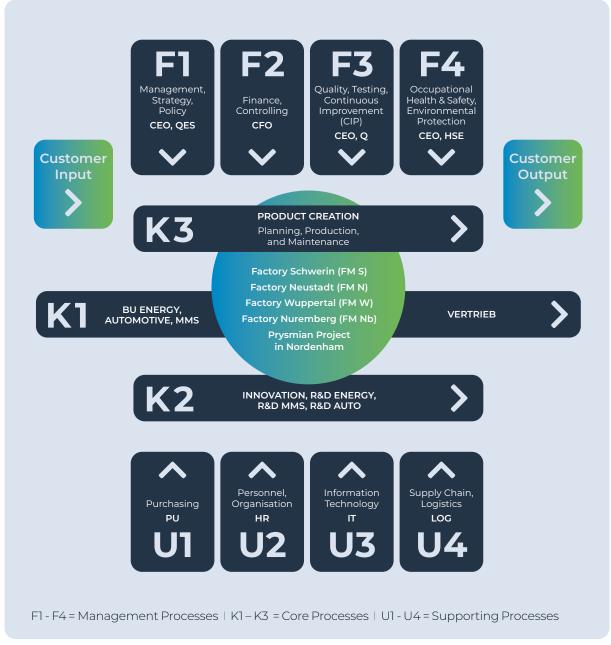
General and site-specific regulations relevant to occupational health and safety, environmental protection, and energy law are listed in a regulatory overview.

The procurement and collection of EU, federal, and state regulations, company policies, as well as municipal or other site-specific regulations, are managed by the responsible environmental protection and energy efficiency management officers or the safety officer.

Regulatory requirements issued through approval certificates are in place. The affected equipment and facilities are listed in a directory, which includes the type and designation of the facility, the responsible organisational unit, the approval reference with the approval date, and the issuing authority.

These internal regulations are available within the organisational units concerned and are fully maintained by the responsible environmental protection and energy efficiency management officer or the safety officer.

5.2 CUSTOMER-RELATED PROCESSES



Process Map

5.2.1 CUSTOMER-ORIENTED PROCESS MODEL

The illustration in section 5.2 shows how the processes at Prysmian Germany are interrelated and depicted as a process model in the form of a process map, as per the standards. The internal and external customer focus, in line with the management policy, is at the forefront of all actions.

The applicable documents and procedural instructions of the Integrated Management System have been assigned to the respective processes accordingly.

5.2.2 DETERMINATION OF CUSTOMER REQUIREMENTS

Customer inquiries are reviewed and then lead to offers.

Compliance with customs laws and the current regulations/laws regarding export control are part of the audit and are monitored by the export control officer.

For determining the quality-relevant steps in the quotation process, the following applies:

- Inquiries received directly from customers (by post, fax, email, telephone)
- Determination of product, sales price, payment terms, and delivery time
- The quotation processing must ultimately be recorded in the SAP system, where it is checked and documented
- · Quotation submission:
- In writing, after clarification of customer requirements
- By telephone (with documentation)

Telephone quotations must be documented with stored in the customer file. date and signature abbreviation. The records are

5.2.3 EVALUATION OF CUSTOMER REQUIREMENTS

If suggestions for product development or new products arise from the quotation process or general market observation, these are evaluated and provided to R&D for further action.

5.2.4 COMMUNICATION WITH CUSTOMERS

We use the following methods for communication with our customers:











Internet (Prysmian Website)

Prysmian

Product presentations e-commerce (tradeshows, seminars)

Customer visits

Phone calls & correspondence





5.3 DEVELOPMENT

The quality of products and processes is determined by the objectives formulated during product planning, as well as by the methods, technologies, and tools used and controlled during product development and adaptation. Environmental protection and energy efficiency requirements are considered through measures for environmentally friendly product design, and occupational safety requirements are taken into account when designing machines and equipment (including modifications) and workplace environments. This sets the foundation for environmental sustainability, occupational health and safety, and energy efficiency in terms of production (manufacturing), product usage, and disposal.

By controlling, verifying, and validating product development, the responsible organisational units ensure that the defined quality, environmental protection, and energy efficiency requirements for the product are clearly and completely described and can be fulfilled. This applies in particular to the product development process and product adaptations (development changes).

5.3.1 PRODUCT DEVELOPMENT PROCESS

A development project is typically initiated by a new product idea, an R&D suggestion (e.g. from quotation processing or market observation), changed regulations or standards, customer specifications, or rationalisation and improvement proposals.

The organisational units responsible for development translate customer requirements, regulatory requirements, and company requirements into the corresponding quality features of the final product. Technical solution concepts are developed and optimised for these features.

For development activities, the Central R&D Department deploys appropriately qualified personnel equipped with the necessary resources. The development process and the definition of the organisational units involved (interfaces) are typically established through R&D projects and/or experimental tasks or assignments.

In order to fulfill product responsibility with regard to §22 of the Circular Economy and Waste Management Act (CEWA), products are designed to minimise waste generation during production and use. Environmentally sound recycling and disposal of waste generated after product use are ensured.

The responsibilities and measures to ensure environmentally-friendly and energy-efficient product design and product recycling are documented.

5.3.1.1 DEVELOPMENT PLANNING

Development planning is carried out by the Central R&D Department. The planning, application, approval, and reporting of development projects are based on the current guidelines of Prysmian Germany and PRYSMIAN S.p.A. Plans for development projects are created and updated.

The lead organisational unit and the project manager are responsible for the planning, management and execution of the development project. They coordinate the collaboration of all parties involved in the development project, and if necessary, involve additional organisational units.

R&D coordinates the collaboration with external research departments, ministries, institutes, universities, and higher education institutions.

The development process may be supported by a development plan (e.g., project management using MS Project), as well as by reports and presentations of cost progress.

5.3.1.2 DEVELOPMENT INPUTS

At the start of development, the market and customer requirements are examined by R&D for appropriateness and feasibility on the basis of the product specifications drawn up by the sales divisions, including the requirements from contract

reviews, and are specified in writing after clarification of incomplete or contradictory requirements (e.g. design draft, aspects of product-related environmental protection and energy use).

5.3.1.3 DEVELOPMENT OUTPUT

To document the development results, R&D prepares, reviews, and approves design documents (e.g. design sheets, drawings, and specifications for testing plans).

5.3.1.4 DEVELOPMENT EVALUATION

During the implementation phase, the technical documentation (e.g. design drafts, draft test plans, and, if necessary, product specifications) is revised as needed and translated into products.

Documented reviews of the development results (including development reviews, if necessary) are conducted at specific development stages (prototype production, initial production under series production conditions, production start-up for series production).

5.3.1.5 DEVELOPMENT VERIFICATION

Development verification is carried out by testing products from trial and sample productions. Functional samples are tested after the final alignment of quality and environmental requirements with the customer and the factories.

Once the development results have been successfully verified, the final documentation is completed in the relevant documents (e.g. design sheet, production plan, test plan, assembly instructions, drawing). These documents are reviewed and approved.

The test results are compared to the specifications as part of a final development assessment and documented.

5.3.1.6 DEVELOPMENT VALIDATION

The fulfilment of the established requirements and/ or user demands is checked as part of development validation, which follows successful development verification and may require testing under operational conditions at the customer's site Once the development validation has been successfully completed, the technical product manager releases the product for series production (product release).

5.3.2 PRODUCT ADAPTATION PROCESS

For approved products and processes, changes and adaptations may be required due to specific customer requests during the inquiry and order processing, changes in standards or laws, or as part of rationalisation measures.

Upon successful production and passing of the required tests, delivery approval is confirmed by the technical product manager.

Any changes made during the product adaptation process must be documented, for example:

Product requirements in the order documents Design changes of a product in the design sheet

Additional specifications in production/testing plans

Process data documents, if applicable adjustment of product specifications

5.4 CONTROL OF EXTERNAL PRODUCTS AND SERVICES

The procurement of raw materials, semi-finished products, goods, and services is based on a cooperative partnership between the purchaser and supplier. This is a key process within the Integrated Management System and has a significant impact on the environmentally friendly design of products and processes. Procurement ensures that the ordered products and services meet the specifications and environmental requirements outlined in the orders.

Procurement is generally carried out by the Central Purchasing Department (PU) based on mutual written agreements between the purchaser and supplier. PU also coordinates the interactions of other organisational units with the suppliers.

Requirements for the procurement of energy are established and documented. For energy-consuming products, facilities, and services that have a significant impact on the organisation's energy performance, criteria are introduced and implemented that take into account energy usage, energy consumption, and energy efficiency over the planned or expected lifespan. Criteria may include energy quality, availability, cost structure, environmental impact, and renewable energy sources.

Our suppliers are informed that the evaluation of the procurement of energy services, products, and facilities which may significantly affect energy usage, is partially based on energy performance. Opportunities are sought to collaborate with the supply chain and influence their energy-related behaviour.

5.4.1 SELECTION OF SUPPLIERS

Purchasing (PU) selects suppliers, taking into account economic factors, from the "Approved Materials List" based on established requirements

and their suitability to meet quality, energy, and environmental demands.

This selection is also based on:

Technical documentation (e.g. material approvals, datasheets, catalogues)

Order documentation (e.g. terms of delivery)

Commercial order data

5.4.2 QUALIFICATION AND EVALUATION OF SUPPLIERS

The qualification of suppliers is carried out by R&D and PU based on the materials approved in SAP.

This is done by:

- Demonstrating the supplier's ability to fulfil the required contractual items (quality capability)
- Providing evidence of a documented quality management (QM), energy management (EM), and environmental management (EvM) system, either through certification, a declaration of conformity, or by auditing the supplier or self-assessment based on our checklist.

A continuous (annual) evaluation is conducted using predefined criteria. The results of the evaluation are to be taken into account when approving suppliers and form the basis for supplier development.

5.4.3 SPECIFICATION OF PRODUCT DESCRIPTIONS, QUALITY, ENVIRONMENTAL AND ENERGY-EFFICIENCY MEASURES

For the procurement of raw materials and services, including semi-finished products and goods, suitable descriptions, technical delivery conditions,

and quality, energy-efficiency, and environmental protection requirements are established.

The procurement documents include, among other things:

Product descriptions
(e.g. designation,
type, and grade)

Applicable standards and regulations for the products

Quality, environmental protection, and energy efficiency requirements to be met

5.4.4 TECHNICAL DELIVERY CONDITIONS, QUALITY ASSURANCE AGREEMENT

Requirements beyond our usual product descriptions and technical datasheets are specified in the technical delivery conditions.

Products are described in product specifications if no applicable technical standards are available, or if certain product requirements exceed the standard. A Quality Assurance Agreement (QAA) aims to commit suppliers to implement quality assurance measures and integrate them into our management system. This agreement is concluded by R&D in collaboration with QHES.

5.4.5 MATERIAL PLANNING

The monitoring and control of issued purchase orders and call-offs from framework agreements are managed through material planning. Order confirmations and changes to requirements are updated and continuously aligned.

Supply chain management also includes the forecasting of delivery schedules, early warning systems to prevent delivery interruptions, and the maintenance of material and supplier master data in the ERP system.

5.4.6 GOODS RECEIPT AND ACCEPTANCE

Upon delivery of the products, the goods receipt department generates the delivery documents. The delivered products undergo an incoming goods inspection, determined by the type and scope of the products.

In case of deviations from the specified requirements, Purchasing (PU) is informed, and coordinates

with the supplier to agree on and implement the necessary corrective actions.

All products that do not comply with the specified incoming inspection requirements are labelled and stored in such a way that prevents their use, processing, or delivery to customers.



5.5 PRODUCTION

5.5.1 CONTROL OF PRODUCTION

At Prysmian Germany, the methods for production and service processes are defined and documented in order to achieve the required quality, while also considering environmental concerns, energy efficiency, and compliance with occupational health and safety regulations. The facilities and work environments have been, and continue to be, assessed for their suitability and are adjusted or optimised as needed. All applicable laws, standards, and regulations are adhered to.

Process parameters and product characteristics are monitored and optimised during production. Where necessary and appropriate, processes and equipment are approved through a corresponding authorisation procedure.

All criteria for the work processes are clearly and practically defined (documented regulations, samples, photos, illustrations). Effective maintenance of the facilities ensures continued process capability.

Processes whose results cannot be fully verified through testing are controlled by constant mon-

itoring and management of process parameters (see section 5.5.2).

For outsourced activities (contract work) that contribute to value creation and logistics, clear specifications for procurement are set, ensuring that the external services are performed in accordance with the required quality standards. Prysmian Germany remains as responsible for these services as if they were performed internally.

The logistical management of production and service delivery is carried out through the use of appropriate software, starting from the receipt of an inquiry through to order processing and delivery to the customer.

Typically, copper or aluminium is used as conductor materials, while PVC, PE, XLPE, and EPR are used as insulation and sheath materials. Protective covers and shields are made from plastic, copper, or aluminium tapes, as well as copper wires.

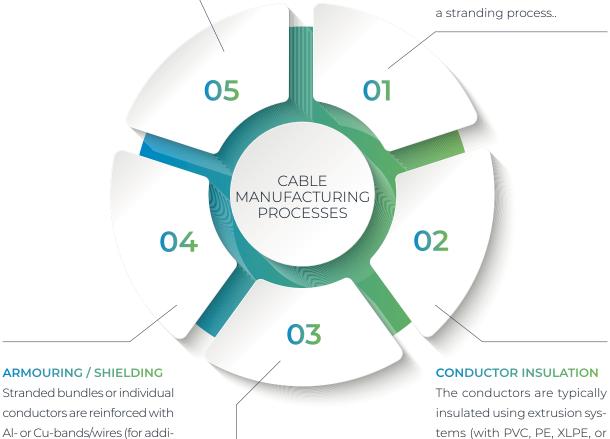


SHEATH MATERIAL

Inner and outer sheaths are usually extruded from materials like PVC, PE, or rubber. These are designed to protect the inner elements of the cable from mechanical damage, moisture, and chemical influences.

CONDUCTOR MANUFACTURING

Delivered rod wires made of copper or aluminium are drawn to the specified dimensions using specialised wire drawing machines as round, flat, or sector-shaped wires. Conductors are used as solid wire (round, sector-shaped) or as stranded conductors (round, sector-shaped) after a stranding process.



CONDUCTOR ASSEMBLY

For multi-core cables or wires, the insulated conductors are brought together by stranding machines. In some products, a counter-wound holding spiral provides the necessary stability.

Where technically possible, several of these processes are combined into a single operation. Packaging

tional mechanical protection)

or are given shielding (for additional electrical protection)

using banding and/or shield-

ing machines.

and shipping are typically done using reels, although cables can also be packaged in coils.

EPR).

The key environmentally relevant aspects, processes, and activities are identified and documented. These primarily include:

EMISSIONS

- Installations and equipment that emit hazardous substances into the atmosphere
- Installations and equipment that emit noise

HAZARDOUS SUBSTANCES

- Procurement, use, and handling of hazardous substances
- Hazardous substances in the product

EMISSIONS

- · Waste collection
- Disposal of unavoidable and non-reusable waste
- Installations and equipment where particularly hazardous waste is generated
- Transportation of waste and particularly hazardous waste
- Assignment of disposal contracts to certified waste disposal companies
- Mediation services in waste disposal on behalf of the customer

ENERGY ASPECTS

- Energy use and energy consumption
- Energy efficiency of installations, buildings, processes, products, and services
- Energy-efficient planning/operation of installations by trained staff
- Measurement of energy consumption
- Creation of suitable indicators for the management of installations and processes
- · Product improvement

SOIL & WATER PROTECTION

- Installations and equipment containing water-hazardous substances
- Installations and equipment that generate wastewater
- Internal transportation of water-hazardous substances or hazardous substances

PRODUCT IMPROVEMENT

- Environmentally friendly product design
- Environmentally relevant customer consulting
- Resource conservation as well as energy and raw material savings

5.5.2 VALIDATION OF PRODUCTION PROCESSES (SPECIAL PROCESSES)

Processes whose results cannot be fully verified through testing are validated by continuous monitoring and control of process parameters. This includes the ongoing qualification of the applied processes, the equipment used, and the personnel

deployed. The established methods and procedures are regularly reviewed and, if necessary, modified or adjusted. Process data is documented.

5.5.3 LABELLING AND TRACEABILITY

Materials and products are labelled from receipt of goods to dispatch to the customer in order to ensure

a clear assignment of products and traceability to individual process steps.

Each product is labelled by the organisational unit responsible for the production process or order processing, for example by:

- · Type designation
- Part number
- · Material designation or batch number
- Factory number, order number, spool number,

Additional documents accompany the entire manufacturing process, and the products themselves are marked for identification. Every processing and inspection step is documented in the accompanying production and inspection records.



5.5.4 PRODUCT PRESERVATION

Product preservation includes defined methods of handling, storage, packaging, preservation, and dispatch. These processes are typically outsourced to external service providers and are monitored by LOG and QHES.

Appropriate measures are in place to protect all products from damage or impairment from goods receipt, throughout the production processes, and up to the contractual handover to the customer. Handling, storage, packaging, preservation, and shipping are considered relevant processes within the management system, meaning they have a significant impact on quality, environmental pro-

tection, and energy efficiency. Ensuring compliance with occupational health and safety regulations is particularly important within these processes.

Packaging is intended to ensure that products, when handled properly during transport and upon receipt by the customer, are protected from damage or impairment and that any risk to the environment is eliminated.

5.5.4.1 HANDLING

Appropriate industrial trucks and lifting equipment are used for handling the products. These are assigned to specific organisational units, which are responsible for both the condition and correct operation of the equipment as well as the safe handling of the products.

When handling products, labelling on the product or its packaging, as well as general instructions and regulations, are observed.

5.5.4.2 STORAGE

The storage of materials/products is carried out by the responsible organisational units within the designated areas and spaces provided to them. Warehouse staff manage the receipt, storage, and delivery according to instructions and regulations in such a way as to prevent or identify any damage or impairment at the earliest possible stage. If issues are identified, the appropriate measures are implemented to prevent processing or delivery to customers and to avoid environmental harm.

The established storage system enables the locating and identification of products, as well as proper access.

If a limited storage period is specified, an assessment of the material/product properties is conducted by the technical product manager upon expiration to identify any impairments, thus preventing processing or delivery to customers.

5.5.4.3 PACKAGING AND PRESERVATION

The responsible organisational units receive packaging and labelling instructions through the work documents accompanying the material/product, as well as general instructions applicable to certain materials, products, storage conditions, receiving regions, shipping methods, or customers.

The organisational unit responsible for packaging monitors compliance with the requirements and adherence to the instructions to prevent impairment of properties, damage to materials/products, and harm to the environment.



5.5.4.4 DISPATCH

Taking into account specific customer requirements and depending on the product, destination, delivery date, and transport costs, the responsible organisational unit selects the mode of transport and issues a transport order.

Loading is carried out according to instructions and regulations to prevent product damage, environmental hazards, and workplace accidents.

A final inspection (shipping check) is conducted by the responsible organisational unit to confirm that the correct products, in undamaged external condition and with specified transport security measures, have been loaded. This transfer for transport is explicitly confirmed.

The carrier receives all transport-related instructions in writing within the accompanying documents (e.g. delivery note, loading list).

At Prysmian Germany, designated individuals are formally appointed in writing for hazardous goods transport, including "waste transport" and "product transport."

5.5.5 MONITORING OF CHANGES

Necessary changes in the production and service delivery at Prysmian Germany are reviewed and controlled in an appropriate form and scope beforehand to maintain the conformity of the Integrated Management System.

The results of these reviews (including risk and opportunity assessments) are retained as evidence

5.5.6 RELEASE OF PRODUCTS AND SERVICES

Appropriate tests, defined in test plans, ensure that the specified product requirements are met. Evidence is documented in test records.

If a product fails to pass inspection, procedures for controlling defective products/processes are applied (see also 5.3).

5.5.6.1 INCOMING INSPECTION

Incoming inspections ensure that the delivered materials/products comply with the quality specifications. Delivered materials/products are identified and labelled in accordance with delivery notes and order documents.

Incoming inspections are conducted according to the specifications (test plans) prepared by the responsible organisational units. Delivered materials/products are only released for further processing once compliance with the specifications has been confirmed.

If the incoming inspection result is negative, the respective materials/products are withdrawn from the production flow. Delivered materials/products that do not fulfil the requirements are labelled and stored separately. Appropriate corrective actions, such as reworking on-site or returning to the supplier, are initiated.



5.5.6.2 IN-PROCESS INSPECTION

In-process inspection serves to check materials/ products during production in order to ensure compliance with quality specifications, as well as to monitor the manufacturing processes.

In-process inspections are conducted according to manufacturing and testing specifications (test plans) by personnel from quality assurance units or by authorised production personnel (self-inspection). The execution of the inspection and confirmation of specification-compliant quality of the materials/products is documented in production records, test reports, test lists, etc.

Materials/products that meet the specifications are released for further processing.

In the event of deviations from the specifications, the materials/products are blocked, labelled accordingly, and removed from the production flow. Reworked materials/products are re-inspected before further processing or delivery.

5.5.6.3 FINAL INSPECTION

The final inspection of products verifies that the specified quality requirements for the finished product are fulfilled and leads to delivery release.

The final inspection of completed products is carried out according to general testing specifications (test plans) and order-specific requirements. Documentation of the prescribed inspections is recorded in the test records. If specified in the order, agreed test records are submitted to the customer or their representative for review and approval (customer acceptance) before the product is released.

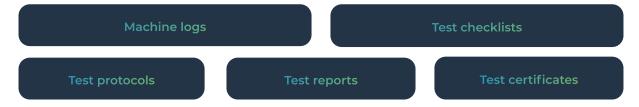
Confirmation of the product's compliance with customer requirements is documented in relevant test certificates if necessary. Products that do not meet specifications are labelled with blocking notes.

5.5.6.4 TEST RECORDS

For incoming, in-process, and final inspections of materials/products, the results are documented

in the test records or electronically in a data processing system.

Examples of test records include:



Records exist in the form of papers and/or electronic media. They are archived in accordance with legal

requirements and internal regulations.

5.5.7 CONTROL OF NON-CONFORMING PRODUCTS

At Prysmian Germany, suitable procedures are in place for handling non-conforming products from external suppliers and internal production to ensure specific handling, such as removal from the production flow or exclusion from assembly. All products that deviate from quality, energy, or environmental requirements are blocked, labelled, and registered. The type of each deviation is documented.

The further handling of defective products and processes is managed by authorised personnel from the respective responsible organisational unit until a decision on the next steps is implemented. Responsibility for the assessment and handling of these products and processes fundamentally lies with the technical product manager.

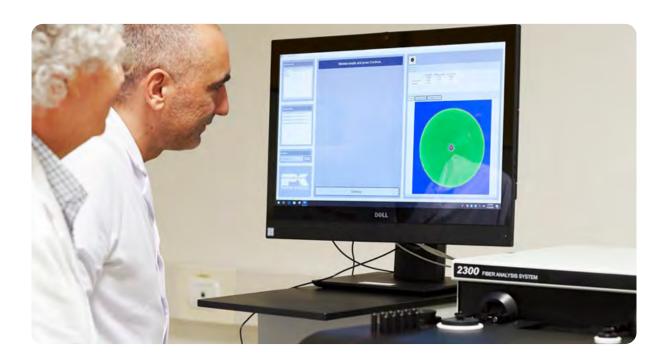
Records are created to initiate corrective actions for all products and processes that deviate from quality, environmental protection, and energy efficiency requirements.

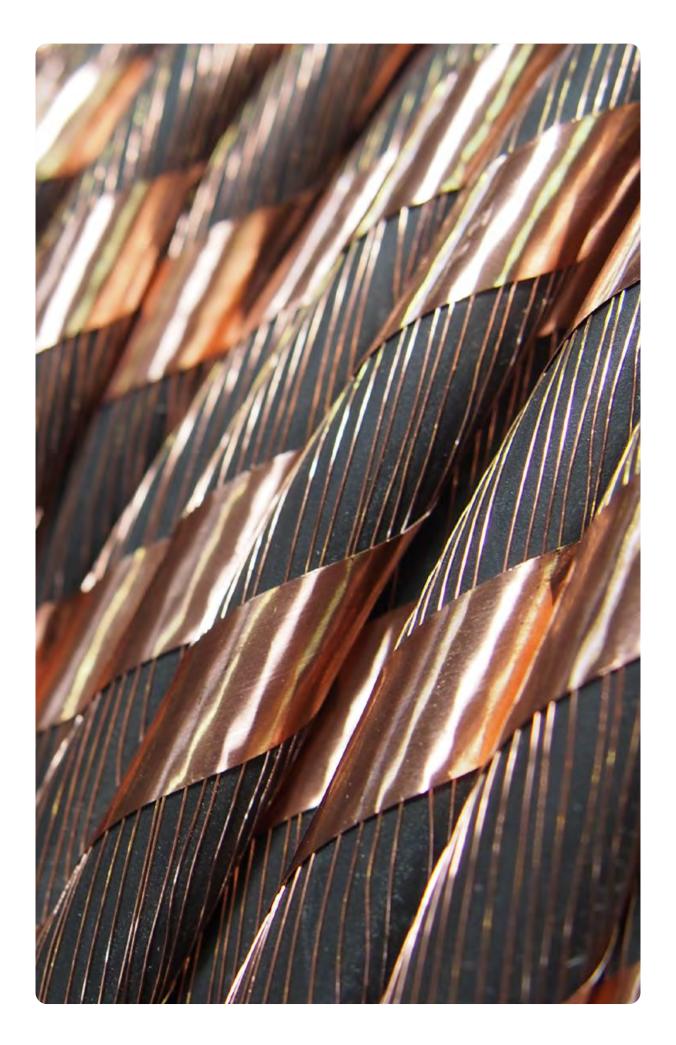
The following decisions may be made, as detailed within the internal regulations of the relevant organisational units:

- · Rework, repair
- Release
- · Rejection
- Scrapping

All affected organisational units are informed about non-conforming products, processes, and their subsequent handling. In cases where deviations cause delivery delays or affect customer requirements,

the customer is informed through the relevant sales departments and involved in deciding on the further course of action.







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6.1 PLANNING FOR MEASUREMENT, ANALYSIS, AND IMPROVEMENT

The necessary testing activities for environmentally, energy, and safety-relevant systems and equipment are planned and monitored through walkthroughs, inspections, internal audits, and internal and external tests (e.g. workplace measurements, emissions measurements, functional tests). As part of the energy planning process, activities for the continuous improvement of consumption are planned.

Within the Integrated Management System, necessary control and corrective actions are also defined, planned, and implemented. Additional requirements from IATF 16949 and ISO/TS 22163 are taken into account.

6.2 MONITORING AND MEASUREMENT

6.2.1 CUSTOMER FOCUS, POST-DELIVERY **ACTIVITIES**

AFTER THE DELIVERY OF PRODUCTS, THE FOLLOWING **CUSTOMER-ORIENTED ACTIVITIES ARE CARRIED OUT:**

- Monitoring of delivered products and provided services as part of regular
 - Communication of suggestions for changes or additions to product customer contacts descriptions
- Evaluation of customer complaints Recycling, repair/maintenance, or disposal of products

6.2.2 DETERMINATION OF CUSTOMER SATISFACTION

Determining customer satisfaction is an essential metric for the effectiveness of the management system.

CRITERIA FOR ASSESSING CUSTOMER SATISFACTION:

- REGARDING PRODUCTS
 - Quality, reliability, and sustainability
 - REGARDING DELIVERY CAPABILITY
- Delivery accuracy, adherence to deadlines, and correct delivery
- REGARDING CUSTOMER SUPPORT Reachability, information, support, and advice
- (V) REGARDING COMPLAINTS Prompt handling (thorough investigation)

The opinions of customers on these criteria are gathered and evaluated by the sales departments in an appropriate manner (e.g. through direct surveys during seminars and customer visits, or from the

results of supplier evaluations conducted by our customers). The resulting evaluations and implications are incorporated into the continuous improvement process as corrective and preventive measures.

6.2.3 INTERNAL AUDIT

Through internal audits, we verify the compliant application of the Integrated Management System. These audits provide a documented assessment of the application and adherence to the management system requirements based on objective evidence (e.g., management policy, management manual, procedural instructions, work instructions, operating instructions). They ensure that laws and regulations are complied with, processes are followed, evaluated for suitability and effectiveness, and continuously improved.

Internal audits are planned at the beginning of the financial year with a central audit plan and are conducted as combined audits (occupational health and safety, quality, environmental protection) or single audits (energy efficiency). Process and validation audits, as well as supplier audits for outsourced activities, should also be included in the planning, but may also be necessary on an ad-hoc basis.

In addition, a hazardous goods inspection is conducted at least annually at the production sites. The procedure for conducting internal audits is documented.

Based on the approved "Loss Prevention Policy", the risk management team conducts an annual risk analysis for fire, explosion, electrical and mechanical failures, and natural disasters, producing a loss prevention report that includes a comparison to the previous year. This report is made available to the sites.

6.2.4 MONITORING AND MEASUREMENT OF ENVIRONMENTAL AND ENERGY-RELEVANT PROCESSES

6.2.4.1 INSPECTIONS BY THE RESPONSIBLE PARTY

The responsible person/operator is required to have regular inspections conducted on environmentally and energy-relevant equipment or activities (e.g., visual inspections for leakage). The specific person assigned to conduct these inspections is determined

on a case-by-case basis. The inspections must be documented in the plant logbook or a similar format. Further details are regulated by procedural instruction.

The contents of the plant logbook include, among others:

- Plant register with monitoring plans
- Overview of environmental and energy aspects
- Data on normal or non-standard operation (emission of substances)
- · Results of safety inspections
- Measurement and monitoring methods
- · Deviations, complaints, and corrective actions undertaken to resolve them

6.2.4.2 INSPECTIONS BY THE MAINTENANCE DEPARTMENT

The Maintenance Department conducts regular inspections as part of the maintenance process, in coordination with the equipment operators and the Environmental Protection and Energy Manage-

ment Officer. External service providers working on-site are also included in this monitoring if their activities are relevant to environmental and energy management.

6.2.4.3 INSPECTIONS BY THE ENVIRONMENTAL PROTECTION AND ENERGY MANAGEMENT OFFICER

To monitor the operational environmental and energy management, the Environmental Protection and Energy Management Officers at each site conduct regular walkthroughs and inspections of environmentally and energy-relevant facilities and areas. The performance of these walkthroughs is documented in the plant logbook or in an inspection report.

6.2.4.4 EXTERNAL INSPECTIONS

In addition to audits by external certification bodies, inspections are carried out by regulatory authorities, the Technical Inspection Association (TÜV), the trade association, or other relevant authorities,

based on statutory regulations. These inspections occur sporadically, either following prior notice or due to urgent circumstances.

6.2.4.5 MEASUREMENT

Environmental and energy-related measuring instruments are selected by the Environmental Protection and Energy Management Officer or by the Health and Safety Officer according to measurement requirements. By legal and operational regulations, measuring instruments must be calibrated appropriately. It must be determined whether self-monitoring is permissible or mandated by authorities, or if measurements need to be conducted by independent and accredited institutions.

The selection and approval of heat, energy, and water meters are carried out by the department responsible for these planning tasks.

Required measurements and inspections for environmentally and energy-relevant equipment and facilities are recorded in the plant logbooks, and for environmentally and energy-relevant activities, they may be listed in separate documents.

Accredited external institutes are also commissioned for measurements on environmentally and energy-relevant equipment. For internally conducted analyses, the procedures outlined in section 4.4 of this manual are followed.

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6.2.5 ASSESSMENT OF COMPLIANCE WITH (LEGAL) OBLIGATIONS

The register of applicable legal regulations (see 5.1.2) records the extent to which Prysmian Germany complies with relevant laws, regulations, statutes, etc., as well as any measures implemented to achieve legal compliance and minimise risks.

Permits and approvals issued by authorities within the scope of environmental and energy management are managed and controlled by the appointed persons. Compliance with (legal) obligations is reviewed for effectiveness in compliance audits and internal audits.

6.3 EFFECTIVENESS REVIEW OF THE PLANNING PROCESS



The actions from the planning process (Chapter 3) are reviewed for their effectiveness through internal audits, inspections, and by core teams with authorised personnel and process owners.

If necessary, corrective or improvement measures are defined.

In principle, risk analyses of environmentally and energy-relevant facilities are carried out during the planning phase or prior to major changes to such facilities, and appropriate measures are taken to minimise the potential for accidents in advance.

After plant malfunctions or accidents, analyses are initiated for the affected and all similar plants, from which appropriate measures are derived (preventive and precautionary measures). These analyses are conducted jointly by maintenance, the operators, the environmental and energy management representative, and the safety officer. Documentation is recorded in the risk assessments and stored at the respective sites.

6.4 DATA ANALYSIS

Within Prysmian Germany, data analyses are conducted to determine the suitability and effective-

ness of the management system and to identify potential changes.

The following key performance indicators (KPIs), among others, are recorded and analysed for this purpose:

Results from measurement and monitoring activities

Information on customer satisfaction

Information on compliance with customer requirements

Information on suppliers

These KPIs are analysed to obtain insights into process and product characteristics and their trends, to evaluate energy efficiency, or to assess suppliers, for example.

cess capability and product or quality characteristics. Which statistical quality checks are necessary is determined during the planning of the assessment and documented in test plans, test instructions, etc..

Statistical methods are applied as needed for the identification, monitoring, and examination of pro-

The following data are used to document and evaluate test results and for the determination, monitoring, and verification of process capability and product/quality characteristics, as, for example:

Error lists Quality control charts

Histograms Quality statistics

Analyses of environmentally relevant systems and processes are conducted internally or by accredited external institutes. These include, for example:

Wastewater analyses Waste analyses

Cooling water analyses Noise measurements

Coolant analyses Analysis of electrical/magnetic fields

Exhaust air analyses Inspection of cooling systems

6.5 MANAGEMENT REVIEW

In addition to regular internal audits conducted within the organisational units, the management performs an annual assessment of the management system (management review) to ensure its suitability and effectiveness.

This review, prepared by the management system representative with support from the quality, energy, and environmental protection team and involving safety officers, focuses primarily on the following topics:

- Overview of the management system and presentation of its development based on selected topics
- Status of measures from previous management reviews
- · Feedback from interested parties
- Changes in the requirements and expectations of interested parties
- · Adequacy of resources
- · Review of the current management policy and, if necessary, adoption of an updated version
- · Results from internal and external audits
- · Complaints and product safety issues
- Progress in implementing the objectives programme
- Environmental performance of development, product improvements, and changes
- Effectiveness of measures taken to manage risks and opportunities
- · Changes in risks and opportunities
- Assessment of compliance with legal regulations
- Evaluation of the management system by the management and reformulation of management objectives
- · Assessment of key performance indicators
- Status of corrective and preventive actions
- Changes that may impact the Integrated Management System (IMS)

The management review is documented, and the report is made available to all heads of sales divisions, central departments, plant managers, quality and energy management representatives, safety

officers, and environmental protection officers. Where required, additional criteria from IATF 16949 are incorporated into the management review.

6.6 CONTINUOUS IMPROVEMENT

6.6.1 PDCA CYCLE

The development of our management system follows the PDCA (Plan-Do-Check-Act) cycle, ensuring a continuous and systematic improvement process aimed at contributing positively to value creation. This

approach significantly supports process reliability and thereby process quality.



The processes required for continuous improvement are planned, directed, and controlled.

The following also contribute to this:

- Management policy
- Management programmes and objectives
- Audit results
- Data analyses
- Evaluation of training assessments
- Corrective, preventive, and precautionary measures
- Management reviews
- Continuous Improvement Projects (CI)

The company's success largely depends on the qualifications, commitment, activities, and knowledge of our employees. The improvement proposal system also plays a supportive and motivating role in this regard.

6.6.2 CORRECTIVE AND PREVENTIVE MEASURES

Identified risks are analysed and, where possible, prevented or minimised through suitable preventive measures. Corrective actions are taken to eliminate the root causes of errors or deviations that have already occurred, in order to prevent their recurrence. Preventive measures aim to address the root causes of potential errors to prevent their occurrence. The effectiveness of these measures is verified and evaluated.

We are committed to implementing precautionary measures to prevent accidents and work-related illnesses, thereby minimising the impact on the safety and health of all employees and third parties, and to improving safety and health protection. Occupational health services are contractually regulated through the company's medical service.

The responsible organisational unit identifies fundamental weaknesses in processes, products, and the management system itself. This analysis is based on identified deviations in occupational health and safety, quality, environmental protection, and energy efficiency management from the following sources:

- · Production processes
- · Results of external or internal audits
- · Work processes in quotation and order processing
- · Quality records
- · Customer service reports
- Damage reports
- · Safety and environmental walkthroughs
- · Energy team meetings
- · Risk assessments

This creates the basis for implementing necessary corrective, preventive, and precautionary measures to avoid recurrence...

The decision on the type of corrective action to be taken, depending on the significance of the deviation or error, is made by:

- The head of the responsible organisational unit or an authorised representative
- The responsible Technical Product Manager or their authorised representative with the involvement of the organisational units concerned

Preventive measures are specifically determined in regular organisational meetings and during walk-throughs, based on similar products and processes.

Corrective actions are initiated, and their effectiveness is monitored. The group of participants is defined in each organisational unit. Affected, non-participating units are informed and involved in the implementation of approved measures.

The results of these meetings are documented. Deviations or major error areas remain on the agenda until the corresponding corrective measures are effective or the unsatisfactory condition is resolved.

The timely and appropriate implementation of corrective measures is monitored by the heads of the responsible organisational units and, where necessary, by the responsible quality, energy, or environmental protection representatives or the safety officer.

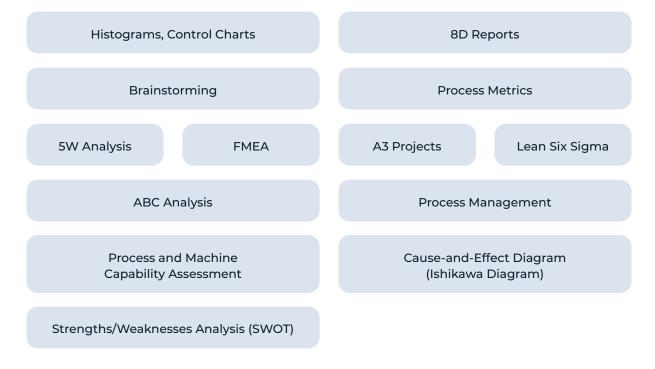
In addition, preventive and precautionary measures are decided upon, with their timely and proper implementation and effectiveness being monitored.

Potential errors and possible causes are identified on the basis of statistical evaluations and error analyses as part of the regular occupational health and safety, quality, environmental protection and energy efficiency reporting and discussion of these.

6.6.3 METHODS FOR CONTINUOUS IMPROVEMENT

With the support of the management representative, efforts are made to ensure that standardised methods and tools are used as part of the continuous improvement process across sites and departments, and that knowledge of these tools is maintained.

The following quality tools are particularly included:



Through workshops and training sessions, employee competencies are developed with the use of quality tools to identify and implement actions needed for the continuous improvement process..

7 APPENDIX

7.1 Terms 102

7.2 Historical Insights 104



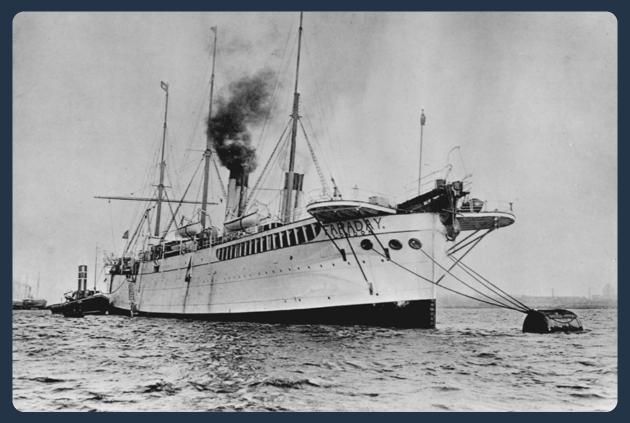


7.1 TERMS

Al	Aluminium
AUT	Automotive
b. Cbg.	bei Coburg
BFOF	Berlin Fibre Optics Factory
BU	Business Unit
CC	Chemical Cross-linking
CDPO	Company Disaster Protection Organisation
	Central Eastern Europe
CEO	Chief Executive Officer
CEWA	Circular Economy and Waste Act
CI	Continuous Improvement
CoC	Commercial Code
CPE	Cross-linked Polyethylene
CPO	Cable Plant Oberspree
CPS	Cable Plant
Cu	Copper
DP	Data Processing
ELIA ETEM	Employers' Liability Insurance Association for Energy,
	Textiles, Electrical, and Media Products
EnM	Energy Management
EnMO	Energy Management Officer
EnMS	Energy Management System
EPO	Environmental Protection Officer
EP	Environmental Protection
EPR	Ethylene-Propylene Rubber
EU	European Union
EvM	Environmental Management
FC	Central Department for Finance, Controlling
FMEA	Failure Mode and Effects Analysis
FM N	Factory Neustadt bei Coburg
FM Nb	Factory Nuremberg
	Factory Schwerin
FM W	Factory Wuppertal
FY	Financial Year
HR	Central Department for Human Resources and Organisation
	Health, Safety, Environment
IATF	International Automotive Task Force
	(QMS Standard for Automotive)
	Inter City Train
	International Financial Reporting Standards
IMS	Integrated Management System

IRIS	International Railway Industry Standard
	International Organisation for Standardisation
	Central Department for Information Technology
	Key Performance Indicator
	Nuclear Safety Standards Committee
	Safety Regulation on Quality Assurance Requirements
kV	
kWh	. Kilowatt-hour
LV	Low Voltage
LOG	Central Logistics Department
MMS	Multimedia & Specials Business Unit
MV	Medium Voltage
0	Operations
OEM	Industrial and Plant Construction Business Unit
OHS	Occupational Health and Safety
OHSC	Occupational Health and Safety Committee
OHSM	Occupational Health and Safety Management
PCI	Prysmian Cable Industrial
PE	Polyethylen
PG DE	Prysmian Germany
PD	Energy Supply Companies Business Unit
PU	Central Purchasing Department
PVC	. Polyvinyl Chloride
Q	Quality
QR	Quality Representative
QHSE	Central Department for Health, Safety, and Environmental Management
	(Quality Health Safety Environment)
QM	Quality Management
QAA	Quality Assurance Agreement
R&D	Central Department for Research and Development, Engineering
R&D	Research and Development
REN	Renewables Business Unit
SAP	Systems, Applications, and Products in Data Processing (Software Company)
SR	Safety Representative
SO	Safety Officer
SOP	Sales Operation Plan
SQA	Self-Responsible Quality Assurance at the Workplace
TCS	Telecommunications Solutions Business Unit
T&I	Trade and Installers Business Unit
TSS	Technical Sales Support
TÜV	Technical Inspection Association

7.2 HISTORICAL INSIGHTS



Special cable ship "Faraday," built in 1874



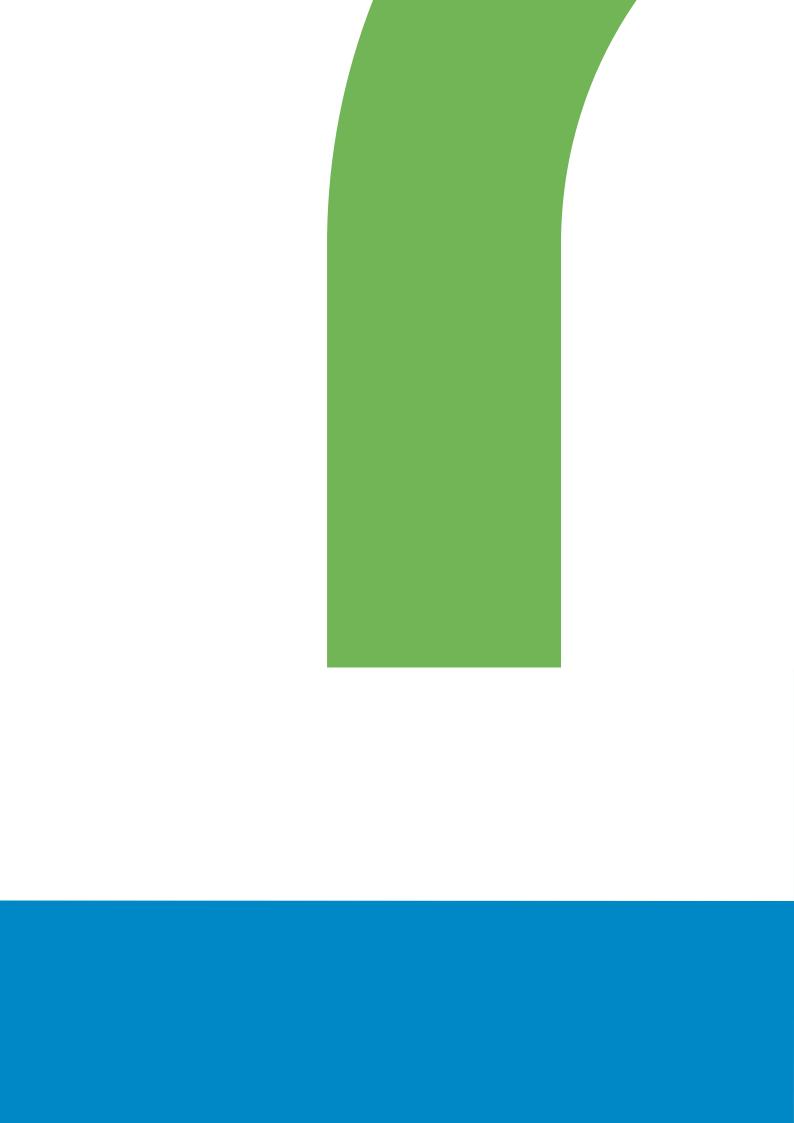
Cable transport wagon for laying telecommunications cable on the Geneva - Lausanne route, around 1920



Transport of a 60 kV power cable in Kassel, 1922



Laying of an urban railway cable in Berlin, 1926-1928



MANAGEMENT MANUAL 2024
Occupational Health and Safety, Quality,
Environmental Protection, and Energy Efficiency
Prysmian Germany

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