



# HELPLINE POLICY



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## **LEADERSHIP MESSAGE**

Prysmian Group (hereinafter the “Company”) is committed to the highest standards of integrity and compliance. This requires you to be alert and to ask a question or report a concern if you need guidance or suspect that there has been or may be a violation of any applicable law or regulation, the Prysmian Group Code of Ethics, or any other Company policy or procedure.

Read and understand the Prysmian Group Code of Ethics particularly noting the sections related to your function, work situation and area. In addition to the many tools, resources and policies referenced in the Prysmian Group Code of Ethics and in this Policy, you will also find a number of people you can turn to for assistance. If anything is unclear in the Prysmian Group Code of Ethics or if you have a concern that you would like to report, talk to someone to get assistance – your Regional Compliance Leader, Human Resources, Legal / Corporate Affairs, your direct supervisor, or the Integrity First Helpline. Only by asking a question or reporting a concern can a potential situation be promptly and effectively addressed.

You can be assured that your questions and concerns will be taken seriously, handled confidentially and that you will not be retaliated against in any form because you asked a question or reported a concern in good faith.

Prysmian Group has adopted this policy as part of its commitment to integrity, transparency and operating in an ethical manner in all aspects of its operations. We are operating as *One Company* and in accordance with our Code of Ethics and Values we are obligated to raise potential questions or concerns. By complying with this Policy, we take ownership in achieving this goal.

Thank you for your commitment to integrity and safeguarding our reputation.

**Valerio Battista**

**Prysmian Group CEO**

## 1. PURPOSE & OBJECTIVE

The purpose of this Policy is to ensure Company employees feel comfortable asking questions or reporting concerns regarding a potential violation of any applicable law, regulation, the Prysmian Group Code of Ethics, or any other Company policy or procedure. This policy provides further detailed guidance and support on the handling and review of questions or concerns.

## 2. POLICY OWNER

Group Compliance owns this Policy and is responsible for periodically reviewing and updating it to ensure it accurately reflects regulatory, best practice, or business developments.

## 3. WHERE TO GO FOR HELP

Questions or concerns regarding this Policy or potential violations of the Prysmian Group Code of Ethics should be addressed to your Regional Compliance Leader, the Integrity First Helpline at [www.prysmiangroup.ethicspoint.com](http://www.prysmiangroup.ethicspoint.com), or your local HR Business Partner. Further guidance may be found at the Ethics & Integrity Homepage: <https://people.prysmiangroup.com/thematic-area/ethics-integrity>.

## 4. APPLICABILITY

This Policy applies to all employees, officers, directors, and legal entities of Prysmian Group.

## 5. YOUR RESPONSIBILITY

This Policy requires you to:

- a) Read, understand, and comply with the requirements included in this Policy;
- b) Comply with Prysmian Group's Code of Ethics and any other applicable policy;
- c) Report immediately to your Regional Compliance Leader or Integrity First Helpline at [www.prysmiangroup.ethicspoint.com](http://www.prysmiangroup.ethicspoint.com) if you observe, or suspect of, any violation of the Prysmian Group Code of Ethics either by a Prysmian Group employee or a third party working on behalf of the Company;
- d) Ask questions or report any concerns related to this Policy;
- e) Complete assigned training related to this Policy when required.

Additionally, Prysmian Group Directors, Managers and Supervisors must always:

- Act as ethical role models;
- Be always available to listen to concerns/questions from other Prysmian Group employees, offering support and guidance;
- Foster a positive working environment where respect is paramount and where diversity of opinion is welcome;

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- Encourage an open reporting environment where Prysmian Group employees feel comfortable in asking questions or reporting concerns;
- Timely and appropriately escalating issues or concerns when necessary;
- Make sure any corrective action taken is consistent with Company policies and procedures;
- Identify key risks and ensure your direct reports receive the necessary training and equipment that employees need to work safely and in compliance with the law.

## 6. INTEGRITY FIRST HELPLINE – KEY CONCEPTS

### 6.1 – How to Report a Concern

The Integrity First Helpline offers several channels allowing any Company employee or external party to report a concern or ask a question:

- Email – [Helpline@prysmiangroup.com](mailto:Helpline@prysmiangroup.com)
- Internet / web-based – [www.prysmiangroup.ethicspoint.com](http://www.prysmiangroup.ethicspoint.com)
- Telephone – refer to Appendix A for country-specific phone numbers

You can also access the Helpline web-page through Prysmian Group's Ethics & Integrity Homepage: <https://people.prysmiangroup.com/thematic-area/ethics-integrity>.

Alternatively, you may contact your Regional Compliance Leader, Legal or HR business partner.

Any Company employee who receives either a written or verbal Helpline concern/issue must:

- Treat the matter confidentially and protect any personal data/information;
- Communicate to the employee involved that he/she is required to report the concern to the Integrity First Helpline;
- Contact your Regional Compliance Leader for further guidance.

The Integrity First Helpline is available 24 hours a day, 7 days a week, in all of Prysmian Group's languages.

### 6.2 – Concerns to be Reported

All Company employees are obligated to report a concern regarding a violation or potential violation of any applicable law, regulation, the Prysmian Group Code of Ethics, or any other Company policy or procedure. Some examples of concerns include, but are not limited to:

- Financial or accounting fraud;
- Non-compliance with Company internal controls;
- Bribery & corruption;
- Harassment, intimidation or discriminatory conduct;
- Health and safety;
- Falsification of Company records;
- Conflicts of Interest.

It is not necessary for the reporter to have observed the violation or have factual documents to support it. A valid and legitimate suspicion is sufficient to report a potential violation or concern, as long as it is done in good faith. Concerns not reported in good faith may result in disciplinary actions.

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The information provided by the reporter should be sufficiently precise and complete in order to conduct a thorough and complete investigation. It is forbidden for the reporter, or anyone else aware of the concern, to start making inquiries or investigate into the matter reported. Responsibility over the investigation is exclusively of Group Compliance.

You are also required to report a concern immediately if you have been notified of an audit, investigation, lawsuit or other inquiry by a regulatory authority or other external party. Such notifications can come in various forms, including written and verbal requests for information, written notification of regulatory action, and receipt of formal legal documents. Immediate notification is essential to ensure any privileged documents are appropriately protected and documents relating to the audit, investigation, lawsuit, or other inquiry are properly retained. Facts for which on-going investigations by public authorities are known or subsequently become known to exist will not be treated under the provision of this Policy.

### **6.3 – Guarantee of Confidentiality**

The identity of the reporter and the facts reported are processed under conditions of strict confidentiality at all the stages of the process unless otherwise required by law or as foreseen in the last paragraph here below. When reporting a concern, the reporter is encouraged to disclose his/her identity in order to be contacted at a later date to provide additional information or details about the case.

The reporter may also remain anonymous if so desired. In this case, it is important to provide sufficiently detailed information to enable the concern to be properly reviewed and investigated (for example, names of individuals involved or who may be aware of the issue, times, and dates of the incident).

The reporter's identity and the facts reported will be kept confidential at all the stages of the process and will not be disclosed to any Company employee or third parties (neither the incriminated person nor the reporter's direct supervisor), but may need to be disclosed to public authorities or relevant people in case of additional investigations resulting from the Integrity First Helpline inquiries.

### **6.4 – No Retaliation**

Any form of retaliation is strictly prohibited. Prysmian Group is committed to ensuring that all employees are free to disclose in good faith any violation, either real or suspected, of the Prysmian Group Code of Ethics or any other Company policy or procedure. You will not be adversely impacted or retaliated upon in the workplace, either personally or professionally, for raising a valid and legitimate concern.

Any adverse employment action against a reporter may constitute retaliation. Examples of retaliatory behaviour include but are not limited to:

- Harassment;
- Discipline;
- Denial of promotion, benefits, or pay;
- Reassignment or exclusion.

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If a reporter believes he or she has been retaliated against, the reporter should contact the Group Compliance. Any employee who retaliates against someone who has reported a violation in good faith will be subject to disciplinary procedures, including possible dismissal. The same applies to any intentional abuse of these reporting processes.

## 6.5 – Employee Responsibility

If you are involved in a Helpline investigation in any way, you must:

- Cooperate when your assistance, or the assistance of any person under your supervision, is sought with respect to any review or investigation;
- Make yourself, any person that you supervise, and relevant documents and information available as part of any review or investigation;
- Answer questions truthfully when asked as part of a review or investigation;
- Volunteer any information in good faith that you believe may assist with a review;
- Not make recordings of compliance-related interviews conducted in person or via telephone or videoconference without the prior written consent of Group Compliance (note: the Case Manager may record the interview. The interviewee will be made aware of this prior to commencement of the interview and will be required to provide consent);
- Keep confidential any information that you receive as part of a review or investigation, including the existence of the review, the persons involved and the factual issues;
- Not engage in retaliatory conduct against individuals who may have asked a question or raised a concern.

Note that any communications made using a Prysmian Group computer, telephone, mobile device or other equipment, and the information stored therein, are Company property and, where permissible under local laws, may be searched without your knowledge or consent. Any access to electronic data, including email, will need to be approved by the Group Compliance Director.

## 6.6 – External Reporting of Concerns

Nothing in this Integrity First Helpline Policy prohibits an employee from reporting potential violations of law or regulation to any governmental agency/entity or public authorities. Employees do not need the prior authorization of the Company to make any such reports or disclosures and are not required to notify the Company that such disclosures have been made.

## 6.7 – Data Collected and Processed

Personal data collected for the purposes of the Integrity First Helpline investigation must be adequate, relevant and not excessive in relation to the purposes for which they are collected or further processed and shall be kept for an appropriate period of time.

The personal data processed within the Integrity First Helpline investigation should be limited to the data strictly and objectively necessary to verify the allegations made. Incident reports are kept separate from other personal data.

Personal data shall be kept in compliance with applicable laws at all times.

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## 7. ROLES AND RESPONSIBILITIES

### 7.1 – Integrity First Helpline Committee

The Integrity First Helpline Committee is a cross-functional internal body composed by the Group Compliance Director, the Head of Legal Affairs, and the Head of Industrial Relations and Employment Governance.

The Integrity First Helpline Committee examines and classifies the Incident Reports received and assesses findings of the investigations. More specifically, the Committee:

- Evaluates whether the initial concern is grounded in fact and requires an investigation;
- Assigns the investigation activity either to the Regional Compliance Leader, Internal Audit function, HR function, Legal / Corporate Affairs function, other relevant Company Functions, or external advisors when deemed necessary in relation to the professional expertise possessed;
- Evaluates the status and results of the investigations carried out by the entrusted functions and indicates the Investigation Reports to be included in the proposal of dismissal to be submitted for approval to the relevant controlling bodies;
- Evaluates any corrective or disciplinary actions to remedy the concern or allegation reported.

### 7.2 – Chief Compliance & Internal Audit Officer

The Chief Compliance & Internal Audit Officer shall:

- When necessary liaise and coordinate with any other Company function and/or with external advisors entrusted by the Integrity First Helpline Committee for the performance of the investigation;
- Provide periodic updates of Helpline related matters to the Control and Risk Committee during their regular meetings. The information is consolidated in the Quarterly Integrity First Helpline Report which includes the Investigation Reports proposed for dismissal.

For the Italian legal entities, the Chief Compliance & Internal Audit Officer provides also periodic updates to the relevant Board of Statutory Auditors and to the relevant Supervisory Board ("*Organismo di Vigilanza*") pursuant to the Italian Legislative Decree 231/2001.

### 7.3 – Group Compliance Director

The Group Compliance Director acts as the Secretary of the Integrity First Helpline Committee and calls the meeting of the Committee based on Incident Reports received.

The Group Compliance Director manages the operational flow of the Integrity First Helpline.

The duties of the Group Compliance Director include:

- Receive the Incident Report from the Prysmian Group Helpline Service Provider;
- Oversee the investigation on behalf of the Integrity First Helpline Committee;
- Evaluate the conclusion of the investigation to ensure consistency across the Company and prepare the Investigation Report;
- Liaise and coordinate with any other Company function and/or with external advisors entrusted by the Integrity First Helpline Committee for the performance of the investigation;

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- Maintain the Prysmian Group Helpline Incident Management Platform and guarantee that all Incident Reports and related Investigation Reports are properly recorded and retained
- Review the Investigation Report and submit it to the Integrity First Helpline Committee.

#### **7.4 – Control & Risk Committee**

The Control & Risk Committee receives:

- The Quarterly Integrity First Helpline Report from the Chief Compliance & Internal Audit Officer or designee with respect to the Incident Reports received through the Integrity First Helpline channels and evaluates the results of the investigation;
- The proposal of dismissal of the Investigation Reports based on the Integrity First Helpline Committee proposal.

For the Italian legal entities the respective Board of Statutory Auditors and the respective Supervisory Board pursuant to the Italian Legislative Decree 231/2001 (*“Organismo di Vigilanza”*) receive a periodic reporting from the Chief Compliance & Internal Audit Officer with respect to the Incident Reports received and evaluates the results of the investigations.

The Board of Statutory Auditors of each relevant Italian legal entity receives the proposal of dismissal of the Investigation Reports based on the Integrity First Helpline Committee proposal, and may request additional clarifications from the Chief Compliance & Internal Audit Officer in case of concerns regarding the financial statements, accounting records, internal controls and auditing.

## **8. INTEGRITY FIRST HELPLINE – PROCESS**

### **8.1 – Question and Concern Intake & Preliminary Assessment**

1 – Questions and concerns reported through the Integrity First Helpline will be promptly assessed on a preliminary basis by Group Compliance to determine the nature of the concern.

2 – Reported questions/concerns will be assigned an identification number by Group Compliance to enable tracking of the question or concern and the ability for those who wish to remain anonymous to follow up to receive a response or provide more information.

3 – The information provided by the reporter will be consolidated in an Incident Report which will be submitted to the Group Compliance Director. The Group Compliance Director will notify the other members of the Integrity First Helpline Committee in order to:

- Examine and classify Incident Reports based on their contents;
- Evaluate whether the concern or question is valid and there is merit to proceed to an investigation;
- Propose the dismissal of those reports that are clearly unfounded or not in good faith;
- Assign the investigation activity either to the Regional Compliance Leader, Internal Audit function, HR function, Legal / Corporate Affairs function, other relevant Company Functions, or external advisors when deemed necessary in relation to the professional expertise possessed.

The Incident Reports are filed in the Prysmian Group Helpline Incident Management Platform which summarizes all the essential information of the concern received. The responsibility of the Prysmian Group Helpline Incident Management Platform maintenance is entrusted to the Group Compliance who guarantees that all the data and information contained therein are treated in accordance with the highest standards of security and confidentiality.

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## **8.2 – Case Management & Review**

- 1 – Each question or concern will be assigned to an appropriate Case Manager.
- 2 – The Case Manager will interview the reporter, if the identify is disclosed, to discuss the question or concern, gather information and clarify any issues to help formulate the scope of the review/investigation.
- 3 – The Case Manager will prepare a work plan for the review or investigation which will be discussed and agreed with the Group Compliance Director or designee. The Group Compliance Director or designee shall, where appropriate, review the work plan with the relevant HQ or Business Unit leaders.
- 4 – The Group Compliance Director or designee will meet with the Case Manager on a regular basis to provide oversight and receive updates on the progress of the review/investigation.
- 5 – Reviews are to be conducted irrespective of an individual’s position or tenure within Prysmian Group and will be completed as soon as reasonably practicable while maintaining a thorough and fair review.
- 6 – If deemed necessary, the Case Manager may seek assistance in any review from other Prysmian Group employees. The Case Manager will discuss the engagement of these support resources with the Group Compliance Director or designee. Depending on the scope and nature of the review, Case Managers may require assistance from outside advisors (such as legal counsel, external auditors, accountants, fraud investigators, information technology experts, etc.) but must obtain prior approval of the Group Compliance Director before retaining such advisors.
- 7 – The individual(s) involved, or subject of the investigation will be notified in a timely manner, appropriate to the type of question asked or concern raised, about the review and involved in the review as deemed necessary and appropriate.
- 8 – The Case Manager will conduct interviews of relevant personnel, solicit and review data and documentation, perform inquiries, and validate information available on the Incident Report in order to evaluate and confirm if the concern or allegation reported is factually substantiated.
- 9 – Once the investigation is concluded, an Investigation Report is prepared and presented to the Group Compliance Director, which either approves the inclusion in the dismissal proposal in the “Quarterly Integrity First Helpline Report” to be submitted for approval to the Control and Risk Committee or requests further investigation work to be performed.
- 10 – Once the dismissal proposal of an Investigation Report is approved by the Integrity First Helpline Committee, the Chief Compliance & Internal Audit Officer or designee adds the report to the “Quarterly Integrity First Helpline Report”, which is submitted to the Control & Risk Committee.
- 11 – Once investigations are closed, Group Compliance will perform proper and timely communication to Business Unit leaders, as appropriate. Regulatory disclosure or regulatory reporting may be required and will be performed as appropriate.

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### 8.3 – Corrective Actions

Once a review or investigation is concluded and if the concern has been confirmed, the Case Manager and/or the Group Compliance Director or designee may recommend that certain corrective actions be taken by assigned owners and within a designated timeframe. The Case Manager and/or the Group Compliance Director or designee will monitor status of any corrective actions that have been recommended to ensure completion.

### 8.4 – Disciplinary Actions

The conclusion of the Integrity First Helpline investigation may indicate that a disciplinary action is necessary in case of illegal or unethical conduct attributable to any Prysmian Group employee. This determination will be made where permissible by law and other contractual obligations in compliance with HR policies and procedures applicable from time to time.

The types of disciplinary actions include, but are not limited to:

- Coaching;
- Verbal Reprimand;
- Written Reprimand;
- Suspension;
- Salary Action;
- Demotion;
- Termination;
- Additional legal action (e.g. civil or criminal prosecution)

Additionally, disciplinary actions may be taken against reporters who have acted in bad faith or individuals who, as part of the investigation, have not been honest and truthful or have not properly assisted or collaborated.

### 8.5 – Reporting

Group Compliance will:

- Maintain a log of all concerns and the status of any investigations and corrective actions. This information will be summarized and reported by Group Compliance to the Risk and Control Committee on a regular basis;
- Monitor the status of corrective actions to ensure they are completed in a timely fashion;
- Ensure that any concerns that must be reported to a regulatory agency are so reported on a timely basis and appropriate data provided;
- Analyze and interpret trend data from questions and concerns to drive proactive communication and training to Prysmian Group employees.

Prysmian Group employees who have asked a question or raised a concern will be kept apprised of the status of their question or concern where appropriate. The Case Manager will provide appropriate feedback to the reporter and to those individuals who were interviewed as part of the investigation, once the review is closed.

For Italian legal entities the respective Board of Statutory Auditors and the respective Supervisory Board also receive a “Quarterly Whistleblowing Report”, pursuant to the Italian Legislative Decree 231/2001 (*Organismo di Vigilanza*).

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## 9. CONSEQUENCES OF POLICY VIOLATION

As a Prysmian Group employee, you are agreeing to uphold our commitment to ethical conduct and integrity and to abide by our Code of Ethics. Prysmian Group employees who violate this commitment or do not comply with this Policy shall be subject to disciplinary procedures, including possible dismissal, and any other legal action required to protect the interest and reputation of Prysmian Group. The Company reserves the right, at its sole discretion, to disclose information about violations of law by Prysmian Group employees to relevant regulatory agencies.

## 10. REPORTING A POLICY VIOLATION

As a Prysmian Group employee, you are obligated to report any Policy violation to:

- Your Regional Compliance Leader OR
- Integrity First Helpline at [www.prysmiangroup.ethicspoint.com](http://www.prysmiangroup.ethicspoint.com)

## 11. RELATED POLICIES

The following Policies are related to this Policy and must be consulted by all Prysmian Group employees for further guidance. These Policies are available in the Ethics & Integrity Homepage: <https://people.prysmiangroup.com/thematic-area/ethics-integrity>.

- A) Code of Ethics
- B) Anti-Corruption Policy
- C) Gifts and Entertainment Policy
- D) Third Party Program
- E) Conflicts of Interest

**Policy Approved by: Prysmian S.p.A. Board of Directors**

**Date Approved: 1 August 2019**

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## APPENDIX A - DEFINITIONS

- **Case Manager:** Any person designated by Group Compliance to coordinate, supervise and conduct the review or investigation of a particular question or concern.
- **Concern:** Any concern about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian Group, including but not limited to the Prysmian Group Code of Ethics.
- **Control & Risk Committee:** The Control & Risk Committee of the Prysmian Group Board of Director's purpose is to assist in Board oversight of the integrity of the Company's financial statements, the Company's compliance with legal and regulatory requirements, the independent auditor's qualifications and independence, and the performance of the Company's internal audit function and independent auditors.
- **Corrective Action:** An action identified during a review that addresses or uses, responds to or mitigates issues raised as part of a question or concern. Examples may include revision of policies and procedures, disciplinary action, regulatory reporting, or recovery of the proceeds of fraud or other conduct that is in breach of applicable law, regulation, policy, or procedure.
- **Disciplinary Action:** An action identified during a review that addresses the actions of a violation of the Prysmian Group Code of Ethics, and/or applicable laws and regulations, the purpose of which is to correct or prevent behaviors that are detrimental to Prysmian Group.
- **Employee:** Individual with an employment contract with any Legal Entity of Prysmian Group. The definition includes any contracted temporary resources.
- **Ethics & Integrity Homepage:** The Ethics & Integrity Homepage is the Compliance homepage, available in the Company intranet at <https://people.prysmiangroup.com/thematic-area/ethics-integrity>. This site serves as a one-stop shop for all Compliance Policies, communications, training materials, and the Integrity First Helpline.
- **Group Compliance:** Prysmian Group function responsible for overseeing and managing all compliance issues within the organization. This function develops programs to safeguard the Company by ensuring all Prysmian employees comply with regulatory requirements and internal policies and procedures. This function will provide guidance, training, advice, and support on all compliance topics and is aimed at being used as a resource for all Prysmian employees.
- **Incident Report:** The report includes the information provided by the reporter. The report is produced by the Prysmian Group Helpline Service Provider.
- **Investigation Report:** The investigation report includes the description and the results of the investigation performed by the Case Manager regarding an incident report.
- **Prysmian Group Helpline Incident Platform:** Secured information system solution provided by the Prysmian Group Helpline Service Provider (NAVEX Global) for the management and storage of the Incident Reports.
- **Prysmian Group Helpline Service Provider:** External service provider independent from Prysmian Group which receives the complaint received through the Helpline channels. The Prysmian Group Helpline Service Provider maintains the Incident Reporting Channels, produces the Incident Reports and maintain the Helpline Incident Platform.

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- **Quarterly Integrity First Helpline Report:** Report which includes a summary of the incident reports received in the last quarter and the Investigation Reports proposed for dismissal by the Prysmian Group Committee to the relevant Control Bodies.
- **Question:** Any question about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian Group, including but not limited to the Prysmian Group Code of Ethics.
- **Reporter:** An employee who reports to the Integrity First Helpline any concern or question.
- **Retaliation:** Occurs when an employer takes punitive actions that negatively impact an employee for acting lawfully and according to Company policies and procedures. Retaliation can include any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment.
- **Review:** The analysis and investigation of the factual, legal and ethical basis of a question or concern, which may include interviews, review of documents and data, site visits and seeking external legal or other advice, as needed.

## **APPENDIX B – QUESTIONS & ANSWERS**

*Question:* I was visiting one of our plants and saw what looked like a leak of toxic material. I mentioned it to the maintenance contractor who said it is always like that. That does not sound right to me. What should I do?

*Answer:* You are right to be concerned. You should talk to your business leader and follow up with the health and safety function which oversees the plant you visited. Any potential environmental impact is important and is a threat to our reputation. The issue should be promptly resolved by those responsible. This is also a good example of what to do if you raise a concern and do not receive a satisfactory answer. Do not give up, raise it to the next level and you can always talk to your Regional Compliance Director or contact the Helpline.

*Question:* My Regional Compliance Leader recently interviewed me as part of an investigation. My supervisor asked me why I was out of the office for two hours and whether there is anything going on that she should be aware of. What do I say?

*Answer:* You should tell your supervisor that you had a confidential meeting with the Regional Compliance Leader. You cannot say anything further. If he/she presses you on it, ask him/her to contact the Regional Compliance Leader directly.

*Question:* I am working on a new government contract and have a lot of questions relating to confidential information, gifts, international trade controls and other matters. Where do I start? What if there is no policy that answers my questions?

*Answer:* You should start by reviewing the Prysmian Group Code of Ethics and other relevant global policies, all of which are located on the Ethics & Integrity Homepage. Your business may also have policies that apply just to people in your business unit or region – these policies are not available on the Ethics & Integrity Homepage. Contact your Regional Compliance Leader for more information and/or if you believe that a global policy should be developed in relation to a specific subject matter or modified.

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## APPENDIX C – HELPLINE PHONE NUMBERS

### International dialing instructions

1. First check to see if there are any dialing restrictions for your country.
2. The telephone you are using must have international dialing capability.
3. Look up your country in the chart below and find your access type and telephone number(s).
4. Follow the directions below to place a call based on the access type for your country.

### International Toll-free Service (ITFS) and Global International Service (GIS)

1. Dial your country/carrier-specific telephone number.
2. You will be given the option to make your report in English or your own language. You will hear a recorded message in your own language explaining the call process.
3. The first person who speaks to you will be an English-speaking interviewer. He or she will bring into the conference call a translator who speaks your language to assist you in reporting your concern. This may take a few minutes. Please be patient.

### World Wide Connect (WWC)

1. Dial your country-specific access code to reach AT&T.
2. When prompted\* enter the 8xx telephone number to connect to NAVEX Global.
3. You will be given the option to make your report in English or your own language. You will hear a recorded message in your own language explaining the call process.
4. The first person who speaks to you will be an English-speaking interviewer. He or she will bring into the conference call a translator who speaks your language to assist you in reporting your concern. This may take a few minutes. Please be patient.

\*This initial prompt could be either a voiceless tone, or a message in English. If the caller does not speak English they may wait on the line and an AT&T operator will help them connect to the 8xx number.

Country	Carrier	Service Type	Access Code	Restrictions*	Phone
Angola		WWC			8552141483
Argentina		ITFS		J	0800-444-1517
Australia		ITFS		M	1-800-48-2597
Austria		WWC	0-800-200-288	27, E	8552141483
Belgium		WWC	0-800-100-10	27, A	8552141483
Brazil		WWC	0-800-888-8288	27	8552141483
Brazil		WWC	0-800-890-0288	04	8552141483
Canada		Regular			8772705055
Canada		Regular			8552141483
Canada		Local			4702196731
Chile		WWC			8552141483
China		GIS Shared Cost		No restrictions	400-8-811-484
Colombia		WWC			8552141483
Costa Rica		WWC			8552141483
Czech Republic		ITFS		J, P	800-143-159
Denmark		WWC	800-100-10	27	8552141483
Ecuador		WWC			8552141483
Estonia		WWC	800-12001	04	8552141483
Finland		ITFS		G, M, H	0800-9-17732
France		ITFS		M	0800-90-4567

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Germany		WWC	0-800-225-5288	27	8552141483
Honduras		WWC			8552141483
Hong Kong		ITFS		M	800-96-1023
Hungary		ITFS		A, M	06-800-21-119
India		WWC	000-117	13	8552141483
Indonesia		ITFS		F, L, 11	001-803-1-003-2517
Italy		ITFS		A, M	800-782078
Luxembourg		WWC	800-201-11	04, 17	8552141483
Malaysia		ITFS		No restrictions	1-800-81-7955
Mexico		ITFS		S, U, 11	001-855-214-1483
Netherlands		WWC	0800-022-9111	A	8552141483
New Zealand		GIS – One Step			0508-612-637
Norway		ITFS		M	800-13180
Oman		WWC			8552141483
Peru		WWC			8552141483
Philippines	Bayan	WWC	105-11	04, A	8552141483
Philippines	Digitel	WWC	105-11	A	8552141483
Philippines	Globe	WWC	105-11	A	8552141483
Philippines	Option 2	WWC	105-11	A	8552141483
Philippines	Philcom	WWC	105-11	A	8552141483
Philippines	PLDT	WWC	1010-5511-00	A	8552141483
Philippines	Smart	WWC	105-11	A	8552141483
Portugal		WWC			8552141483
Qatar		GIS International		No restrictions	800-0187
Romania	Romtelecom	WWC	0808-03-4288	04, 31, A	8552141483
Russia		WWC	8^10-800-110-1011	A, D	8552141483
Russia	Moscow	WWC	363-2400	No restrictions	8552141483
Russia	outside Moscow	WWC	8^495-363-2400	A, 22, D	8552141483
Russia	outside St. Petersburg	WWC	8^812-363-2400	A, 22, D	8552141483
Russia	St. Petersburg	WWC	363-2400	A, D	8552141483
Singapore		ITFS		M, P	800-110-2171
Slovak Republic		WWC	0-800-000-101	27, D	8552141483
Spain		WWC	900-99-0011	27	8552141483
Sweden		WWC	020-799-111	No restrictions	8552141483
Thailand		ITFS		03, P, 11, M	001-800-11-003-2517
Tunisia				M	+33 0800-90-4567
Tunisia			8000-555-66	No restrictions	+971 8552141483
Turkey		WWC	0811-288-0001	04, 12, A	8552141483
United Arab Emirates		WWC	8000-021	27, A	8552141483
United Arab Emirates		WWC	8000-555-66	No restrictions	8552141483
United Arab Emirates	Military-USO & cellular	WWC	8000-061	27	8552141483
United Kingdom		ITFS		F, M	0808-234-8817
United States		Regular			8772705055

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United States		Regular			8552141483
United States		Local			4702196731
Vietnam	Viettel	WWC	1-228-0288	32	8552141483
Vietnam	VNPT	WWC	1-201-0288	29	8552141483

## Restrictions

Service Type	Code	Description
ATTD	04	Not available from cellular phones
ATTD	12	Requires international access
ATTD	13	Only available from phones allowing international access and most public calling centers; may not be available from all locations; not available from public phones.
ATTD	17	Collect calling from public phones
ATTD	22	Add'l charges apply when calling outside Moscow, St. Petersburg
ATTD	27	Available from cellular phones
ATTD	29	VNPT phones (mobile and landlines including Vinaphone and Mobiphone)
ATTD	31	Available only from named carrier
ATTD	32	Vietel phone (mobile and landlines including Vietel Mobile)
ATTD	A	Public phones require coin or card deposit
ATTD	D	May not be available from every phone/public phone
ATTD	E	Public phones may require local coin payment during call duration
GIS International	ITF22	Only available on an individual case basis.
GIS International	ITF25	Qatar has a monthly rental charge of \$50 charge per number.
ITFS	03	Not available from public phones or all areas
ITFS	11	Phone must have international access
ITFS	A	Public phones require coin or card deposit
ITFS	E	Public phones require local coin payment through call duration
ITFS	F	Not available from payphones
ITFS	G	Available from payphones for ITFS but not for UIFN
ITFS	H	UIFN callers using mobile phones charged local charges
ITFS	J	Available from mobile phones for ITFS but not for UIFN. Airtime charges may apply.
ITFS	L	Limited availability from mobile phones. Airtime charges may apply.
ITFS	M	Available from mobile phones. Airtime charges may apply.
ITFS	P	

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ITFS	S	Telephone Administration may restrict the use of toll-free numbers for certain applications such as resale, prepaid cards, calling cards, call-back purposes or third-country calling. A general per call surcharge may be assessed to the caller.
ITFS	U	May work from non-Carrier phones. Non-Carriers may treat calls as international long distance calls and not toll-free.

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