

## **Anti-slavery and human trafficking statement**

### **Our commitment:**

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

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

### **Our organisation:**

Prysmian Group is the world leader in energy and telecom cable systems with a direct presence in more than 50 countries around the world, 108 plants, 26 R&D centres and over 30,000 employees. In the financial year ended 31 December 2022, Prysmian Group had sales in excess of 16 billion euros. To find out more about Prysmian Group, please visit <https://www.prysmiangroup.com/en>.

In the UK, Prysmian is engaged in the manufacture and installation of energy (including submarine) and telecommunications cables and systems to service home and export markets.

### **Prysmian Cables & Systems**

- Our trade and installers business manufactures low voltage products including both rigid and flexible cables for the distribution of power to and within residential, commercial and industrial buildings. Product development and innovation is focused on high-performance cables such as fire resistant and low smoke-zero halogen cables that satisfy specific safety requirements.
- Our power distribution business manufactures solutions mainly designed to support utilities and grid operators in power distribution and transmission, including medium-voltage cable systems for connecting industrial and/or residential buildings to the primary distribution grid, as well as low-voltage cable systems for power distribution.
- Our high voltage business designs, manufactures and installs high and extra-high voltage cable systems for the transmission of electricity from generating stations and within transmission and primary distribution grids. We also provide network monitoring and preventive maintenance, the repair and maintenance of cable connections and emergency services that include prompt action in the event of damage.

- Our cable accessories and network components businesses provide accessories and network components for jointing cables and connecting them to other devices, including connectors and terminals for low, medium, high and extra-high voltage cable and submarine cable systems.
- Our telecom solutions business develops and manufactures a wide range of cable systems and connectivity products used in telecommunication networks.

#### Draka Comteq

- Our MMS multimedia specials business manufactures and supplies copper and fibre cables for short/medium runs in offices and data centres; optical and copper cable for various uses, such as cabling for radio and TV stations and film studios; fire-resistant coaxial cables and cables for connecting base stations and aerials in mobile networks.

#### Prysmian Powerlink Services

- Our submarine business provides installation services for submarine power cables for offshore windfarms and subsea power interconnectors utilising state of the art cable-laying vessels, including the Cable Enterprise, which is mainly used to install export cables for offshore windfarms, and the Ulisse, which carries out efficient installations in shallow waters, using an anchor handling mooring system.

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

#### **Our policies:**

##### Prysmian Group Code of Ethics

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

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

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

##### Prysmian Group Human Rights Policy

The Prysmian Group Human Rights Policy states Prysmian's commitment to ensuring voluntary employment for all its employees and eliminating any form of forced, bonded and compulsory labour, following the ILO Convention No. 29 and 105. Banned forced labour also includes human trafficking, threatening workers with severe deprivations, such as withholding passports or other ID documents, food or land or wages, physical violence or sexual abuse, or bonding workers through debts.

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

### UK Anti-Slavery Policy

In 2016 Prysmian UK introduced a specific Anti-Slavery Policy which sets out our approach to preventing exploitation and human trafficking within our workforce and that of our supply chain. The policy covers the following key areas.

1. Recruitment – the policy sets out the due diligence processes which we follow in relation to recruitment to ensure we minimise the risk of slavery and human trafficking within our directly employed workforce.
2. Supply Chain – the policy sets out the due diligence processes which we follow in relation to the engagement of new suppliers as well as subsequent reviews and audits to ensure we minimise the risk of slavery and human trafficking within our supply chain. We require our direct suppliers to undertake steps to ensure this risk is minimised for organisations indirectly supplying to us as part of our direct suppliers' own supply chain.
3. Training – the policy sets out our commitment to providing appropriate training to those members of our staff who are involved in managing recruitment and our supply chains.
4. Reporting – the policy encourages our employees to notify any concerns and sets out the various options available, including details of our Group Whistleblowing Policy which enables individuals to report concerns confidentially and anonymously.

### **Due diligence**

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

Our procedures are designed to:

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

In addition, our standard terms and conditions of purchase include specific obligations on our supply chain in relation to modern slavery. This provides a specific contractual mechanism to facilitate the monitoring and assessment of compliance by our supply chain with the Modern Slavery Act 2015.

### **Risk and compliance**

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

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

**Effectiveness and KPIs**

During 2022, Prysmian UK requested that all of its suppliers complete a Modern Slavery questionnaire. The purpose of the questionnaire was to get feedback on their approach to modern slavery issues and to help to identify potential areas for improvement and actions in future years.

We received more than 430 responses to the questionnaire and a summary of some of the key results is set out below.

**Procedures to prevent slavery and human trafficking in your operations**

Do you have a program to ensure human trafficking and slavery do not exist in your operations?	77% of all respondents responded yes, 96% of all respondents with 250+ employees responded yes
Do you conduct audits of your operations?	77% of all respondents responded yes, 94% of all respondents with 250+ employees responded yes
Have you trained relevant employees (e.g. management and those in charge of your supply chain) on what slavery and human trafficking are and how to mitigate the risk of them in their roles?	68% of all respondents responded yes, 94% of all respondents with 250+ employees responded yes
Do you have adequate grievance procedures which your staff are free to use?	93% of all respondents responded yes, 98% of all respondents with 250+ employees responded yes

**Procedures to prevent slavery and human trafficking in your supply chain**

Do you have a program to ensure human trafficking and slavery do not exist in your supply chain?	65% of all respondents responded yes, 92% of all respondents with 250+ employees responded yes
Have you identified the overall risks of slavery and human trafficking in your supply chain e.g. by mapping your supply chain and/or by analysing the countries you source from?	59% of all respondents responded yes, 86% of all respondents with 250+ employees responded yes
Do you conduct audits of your suppliers?	61% of all respondents responded yes, 90% of all respondents with 250+ employees responded yes
Do you require your direct suppliers to certify that all materials incorporated into your final product were sourced, processed and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate?	54% of all respondents responded yes, 88% of all respondents with 250+ employees responded yes

Prysmian UK has not received any notifications of concerns related to modern slavery during the financial year ended 31 December 2022.

**Training:**

Prysmian Group’s Compliance team organize regular training to our staff on all compliance related topics, including our Code of Ethics and Human Rights Policy. During 2022, our Global Compliance team delivered more than 10,000 hours of training sessions on a variety of compliance topics. In addition, specific training is provided to key functions within the UK on the UK Anti Slavery Policy, including training on how to recognise the risks of modern slavery and human trafficking in our business and supply chains.

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

**Further actions:**

Following a review of our actions in the financial year to 31 December 2022 to prevent slavery or human trafficking from occurring in our business or supply chains, throughout 2023 we intend to continue with our programme of supplier audits and this will include follow up with those suppliers who submitted responses to our survey which would indicate areas for improvement. In addition, Prysmian Group's Compliance team will continue to organize regular training to our staff on all compliance related topics.

**Approval of statement:**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2022. The statement has been approved by the board of directors of Prysmian UK Group Limited.



Matteo Bavaresco  
CEO, Prysmian UK  
5 June 2023

This statement applies to Prysmian UK Group Limited and each of the following subsidiaries. The board of directors of each of these subsidiaries has reviewed and approved this statement.

- Prysmian Cables & Systems Limited (company number 958507)
- Prysmian Powerlink Services Limited (company number 07656179)
- Draka Comteq UK Limited (company number 05040573)

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

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

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

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

#### **Prysmian PowerLink S.r.l.**

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Capitale Sociale € 100.000.000  
interamente versato  
Società con socio unico  
Direzione e coordinamento di  
Prysmian S.p.A.

Further, in 2022 Prysmian announced an investment of approximately €200 million in a new cutting-edge cable-layer plus adjustment for cables equipment of approximately €40 million. The new vessel will be fully operational by Q1 2025 and will reinforce Prysmian's project execution capabilities and its EPCI (Engineering, Procurement, Construction, Installation) approach.

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

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### **Approval of statement:**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2022. The statement has been approved by the board of directors of Prysmian PowerLink S.r.l.



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Hakan Ozmen  
CEO, Prysmian PowerLink  
21 June 2023