

## Anti-slavery and human trafficking statement

### Our commitment:

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

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

### Our organisation:

Prysmian is the world leader in energy and telecom cable systems with a direct presence in more than 50 countries around the world, 109 plants, 30 R&D centres and around 34,000 employees. In the financial year ended 31 December 2025, Prysmian had sales in excess of 19 billion euros. To find out more about Prysmian, please visit <https://www.prysmian.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 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 Code of Ethics

The Code of Ethics states that Prysmian is committed to the respect, safeguarding and promotion of the human rights of all people directly or indirectly involved in our operations and sets out details of what we do and what we expect from third parties.

What we do:

- As established in our D&I Manifesto, we secure the dignity of each individual and adopt an inclusive approach, supporting the uniqueness of each person and believe that diversity represents a source of enrichment and innovation.
- We develop and maintain a working environment where there is no room for any form of discrimination or harassment – both physical and verbal – by race, sex, skin color, nationality or social origin, ethnicity, language, religion, age, disability, sexual orientation, gender identity or expression, adherence to association or labor unions, political opinion or any other state protected by applicable laws.
- As mentioned in our Human Rights Policy, we evaluate the impact on human rights, and we monitor our performance involving several parties within the process.
- We refuse and firmly hinder any form of violence against women which provokes or can provoke physical, sexual, or psychological damage, including violence threats, coercion, or arbitrary deprivation of personal freedom, both in public and private life. For further information, read our Global Anti-Harassment Policy.
- We promote equal opportunities in every level of our organization and ensure fair remuneration for all our employees in compliance with applicable regulations, including the ones regarding minimum wage, working overtime and compulsory benefits.
- We recognize the value of collective bargaining as a crucial tool to determine contract terms for our employees and the regulation of relations with trade unions.
- We reserve the right to assess relevant third parties respect our standards and obligations in relation to human rights and corporate sustainability.

What we expect:

- We require all our third parties, especially the ones who are part of our supply chain, to
  - adhere to our commitment regarding fundamental human rights, as well as the fight against any form of discrimination, harassment, or abuse;
  - repudiate and strive to fight any form of slavery, traffic of human beings, forced and child labor;
  - not adopt any form of abuse, threats, intimidation, bullying, or any behavior that could jeopardize, even potentially, a person's dignity or well-being;
  - adhere to the principle of social and economic equality.

All those working for or on behalf of Prysmian must comply with the Code of Ethics, including our supply chain. Violation of the Code of Ethics and/or the applicable Company policies or procedures' provisions could be subject to legal actions and/or disciplinary measures, up to: (i) the termination of the employment relation, (ii) the termination of the contract or (iii) the interruption of the business relation.

### 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 Code of Ethics and Human Rights Policy, please visit <https://www.prysmian.com/en/company/ethics-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 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 2025, 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. This was a repeat of an exercise previously carried out in 2022.

We received nearly 550 responses to the questionnaire (an increase of more than 100 compared with 2022) and a summary of some of the key results is set out below, together with details of the change seen over the three year period since the questionnaire was last done.

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

<p>Do you have a program to ensure human trafficking and slavery do not exist in your operations?</p>	<p>2025 79% of all respondents responded yes, 93% of all respondents with 250+ employees responded yes</p> <p>2022 77% of all respondents responded yes, 96% of all respondents with 250+ employees responded yes</p>
<p>Do you conduct audits of your operations?</p>	<p>2025 78% of all respondents responded yes, 94% of all respondents with 250+ employees responded yes</p> <p>2022 77% of all respondents responded yes, 94% of all respondents with 250+ employees responded yes</p>
<p>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?</p>	<p>2025 70% of all respondents responded yes, 93% of all respondents with 250+ employees responded yes</p> <p>2022 68% of all respondents responded yes, 94% of all respondents with 250+ employees responded yes</p>
<p>Do you have adequate grievance procedures which your staff are free to use?</p>	<p>2025 91% of all respondents responded yes, 97% of all respondents with 250+ employees responded yes</p> <p>2022 93% of all respondents responded yes, 98% of all respondents with 250+ employees responded yes</p>

Procedures to prevent slavery and human trafficking in your operations

<p>Do you have a program to ensure human trafficking and slavery do not exist in your supply chain?</p>	<p>2025 71% of all respondents responded yes, 96% of all respondents with 250+ employees responded yes</p> <p>2022 65% of all respondents responded yes, 92% of all respondents with 250+ employees responded yes</p>
<p>Have you identified the overall risks of slavery and human trafficking in your supply chain e.g. by mapping your supply</p>	<p>2025 61% of all respondents responded yes, 87% of all respondents with 250+ employees responded yes</p>

chain and/or by analysing the countries you source from?	<p>2022 59% of all respondents responded yes, 86% of all respondents with 250+ employees responded yes</p>
Do you conduct audits of your suppliers?	<p>2025 59% of all respondents responded yes, 75% of all respondents with 250+ employees responded yes</p> <p>2022 61% of all respondents responded yes, 90% of all respondents with 250+ employees responded yes</p>
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?	<p>2025 60% of all respondents responded yes, 84% of all respondents with 250+ employees responded yes</p> <p>2022 54% of all respondents responded yes, 88% of all respondents with 250+ employees responded yes</p>

The high-level results appear to be relatively similar across the two surveys, with a positive development in the proportion of suppliers who have anti-slavery programs in place, particularly in relation to their supply chain. We will be looking to use the results to identify further areas for potential improvement and actions.

Prysmian UK has not received any notifications of concerns related to modern slavery during the financial year ended 31 December 2025.

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 2025, our Global Compliance team delivered over 6,000 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. A specific refresher training session dedicated to modern slavery was held for the UK Management Team in 2025.

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 2025 to prevent slavery or human trafficking from occurring in our business or supply chains, throughout 2026 we intend to continue with our programme of supplier audits. 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 2025. The statement has been approved by the board of directors of Prysmian UK Group Limited on 22 June 2026.

A handwritten signature in blue ink, appearing to read 'Raymond Petrus', with a horizontal line underneath it.

Raymond Petrus  
Country Manager, Prysmian UK

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 on 22 June 2026.

- 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 six (Giulio Verne, Cable Enterprise-CENT; Ulisse, Leonardo da Vinci and the two newcomers in 2025 Monna Lisa and Marco Polo) among the most state-of-the-art cable-laying vessels in the world and a wide range of high-tech burial tools such as Hydro Plow or Heavy Duty Plow, 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 vessels, Prysmian can also count on a shallow water cable-laying barge, Barbarossa, 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.

#### PRYSMIAN POWERLINK S.R.L.

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Capitale Sociale € 200.000.000 i.v.  
Società con socio unico  
Direzione e coordinamento di  
Prysmian S.p.A.

The main tool onboard is a vertical injector, although the barge can be used for various other tools, including the SeaREX trencher for coastal operations.

Further, Prysmian has previously announced one new cutting-edge vessel, Alessandro Volta, which will be fully operational by 2027 and will reinforce Prysmian's project execution capabilities and its EPCI (Engineering, Procurement, Construction, Installation) approach.

The fleet is completed by two post lay burial vessels chartered on long term basis and new post-lay burial tool (jetting and trenching) expected to be fully operational by 2027.

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

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### **Our policies:**

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## **Further actions:**

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chains, throughout 2026 we intend to continue with our programme of supplier audits. In addition, Prysmian's Compliance team will continue to organize regular training to our staff on all compliance related topics.

**Approval of statement:**

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2025. The statement has been approved on behalf of the board of directors of Prysmian PowerLink S.r.l. on 22 June 2026.



Raul Gil Boronat  
CEO, Prysmian PowerLink S.r.l.  
22 June 2026