

SASB Report 2020



Prysmian
Group

Linking the
sustainable future



Prysmian Group

PEOPLE

Prysmian Group

Prysmian Group

Electriciens sans frontières

odebo

ysmi

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Slidebp

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SASB Report 2020



Contents

METHODOLOGICAL NOTE	6
PRYSMIAN GROUP	7
Business areas	7
ENVIRONMENTAL DIMENSION	9
Energy Management	10
Hazardous Waste Management	10
HUMAN CAPITAL DIMENSION	12
Workforce Health & Safety	13
BUSINESS MODEL & INNOVATION DIMENSION	14
Product Design & Lifecycle Management	14
Materials Sourcing	15
LEADERSHIP & GOVERNANCE DIMENSION	17
Business Ethics	17
ANNEX	21
SASB Dimension reported in the Report	21
SASB disclosure index	22
INDEPENDENT AUDITORS' REPORT	25

Methodological Note

The SASB Report 2020 of Prysmian Group (hereinafter “the Report”) is aligned to the Sustainability Accounting Standards Board (SASB) framework, published in 2018, for the sector denoted as “Resource Transformation — Electrical & Electronic Equipment” (SASB code RT-EE). However, given the diversified nature of Prysmian Group’s business, also accounting metrics associated with the sector denoted as “Infrastructure - Engineering & Construction Services” (SASB code IF-EN), that would be of interest to our stakeholders, have been included. Prysmian Group will continuously evaluate the disclosure of additional topics as these emerge, considering relevance, availability of high-quality data and consistency with the Prysmian Group’s business. The “SASB disclosure index”, containing details of the accounted metrics, is reported at the end of the Report (page 22).

The Report refers to the 2020 financial year (from January 1st to December 31st) and includes the most recent year-end figures available. The data and information reported refer to all companies of the Prysmian Group at December 31, 2020, consolidated on a line-by-line basis. Within the report are included figures of 2019 as a comparison year.

For more information regarding the Group’s approach to the dimension included in the following disclosure, please refer to the information contained in the 2020 Sustainability Report (prepared in accordance with articles 3 and 4 of the Italian Legislative Decree 254/16) approved by the Board of Directors of Prysmian S.p.A. on March 10, 2021.

This document has been subjected to a limited examination, according to the principle of the International Standard on Assurance Engagement (ISAE 3000 Revised), undertaken by EY S.p.A. The audit was performed according to the procedures indicated in the “Independent Auditors’ Report”, included in this document.

For comments, requests, opinions and suggestions for improvement on Prysmian’s operations and on the information reported in this Report, please contact Corporate and Business Communications at the following email address: sustainability@prysmiangroup.com.

Prysmian Group

Prysmian Group is world leader in the power and telecom cable systems industry.

more than

10 Billion euro in sales

about

28.000 Employees

104 Plants

presence in more than

50 Countries

The Group has a consolidated presence in technologically advanced markets, offering a broad range of products, services, technologies and know how to manufacturers that use cabling systems in the production and distribution of energy and telecommunications.

Established as Pirelli Cables at the end of the 1800s, the Prysmian Group has grown by acquisitions. This strategy sustained expansion of the range of products and services, with constant innovations, improving standards and a greater geographical presence, which is a strength when serving regional market needs. The evolution of the Group over the years has highlighted not only the expansion of our know-how and technological capabilities, but also our operational ability to identify synergies and reduce costs, thereby becoming an industry leader in the area of operational efficiency as well. Our operations are constantly driven by a set of strong beliefs that support our ESG identity in what we do and in how we do it, as well as in our vision for the future. These convictions translate into the concepts of Values, Mission and Vision.

BUSINESS AREAS

The Group is organised in a matrix structure by reference market and business unit, identifying three macro-areas of activity.

Energy

Comprising business segments that offer a complete and innovative portfolio of products designed to satisfy the many needs of the markets served. This macro-area is organised as follows: Energy & Infrastructure, which includes Trade & Installers, Power Distribution and Overhead Transmission Lines, and Industrial & Network Components, which includes Oil & Gas, Elevators, Automotive, Network Components, Specialties & OEM (serving in turn the following sectors: Cranes, Mining, Railways, Rolling Stock, Marine and Renewables – cables for the solar energy industry and for the operation and connection of wind turbines) and Electronics (Asset Monitoring Solutions).

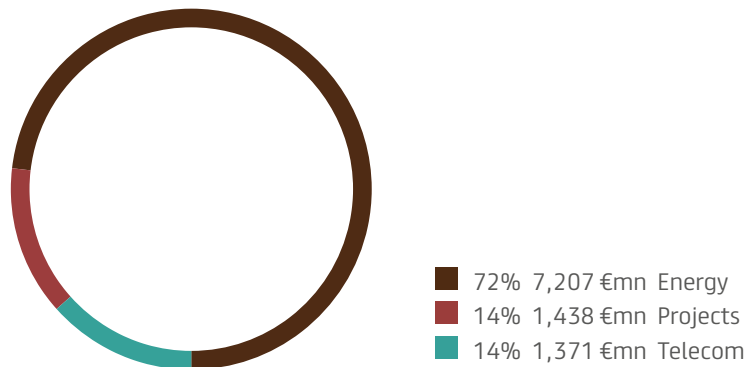
Projects

Comprising high-tech and high value-added businesses focused on the design, production and customisation of HV and EHV cabling systems for terrestrial and submarine applications. The Group develops pioneering “turnkey” submarine cable systems for installation at depths of up to 3,000 metres, assisted by its cablelaying fleet comprising the Giulio Verne, the Cable Enterprise and the Ulisse (as well as the Leonardo da Vinci, which will become operational in 2021). Prysmian Group also offers advanced services for terrestrial and submarine interconnections between various countries and between offshore wind farms and the mainland, used for both the generation and distribution of electricity.

Telecom

Comprising businesses devoted to making the cabling systems and connectivity products used in TLC networks. The product portfolio includes optical fibre, optical cables, connectivity components and accessories, OPGW (Optical Ground Wire) and copper cables. The Group is also among the leaders in the production of optical fibre — the essential component of all types of optical cables. A wide range of optical fibres is designed and made using proprietary technology to cater to the broadest possible spectrum of customer applications: single-mode, multimode and specialty fibres. In both cables and connectivity, the Group focuses on the design of products that provided greater density in a smaller diameter, with ease of use and optimal fibre management.

REVENUES GENERATED BY BUSINESS AREA IN 2020



Environmental dimension

The Group strives actively to safeguard and protect the environment and conserve natural resources, in order to create sustainable value for the benefit of both the organization and our stakeholders. The Group's commitment to safeguarding the environment and conserving natural resources is expressed both by the intrinsic characteristics of our products and by how our production systems are managed. In particular, the prevention and reduction of their environmental impact are achieved, for example, by the efficient use of natural resources, the optimization of logistics flows and the responsible management of waste.

This commitment is reflected, above all, in application of the Group's Health, Safety, Environment and Energy policy. This policy was updated in 2020 to better present the Group's vision and commitment to consolidating a culture of Health, Safety and Environmental protection, not least by safeguarding biodiversity at Group locations and managing Energy in a systematic manner, as a prerequisite for the achievement of our objectives and the creation of value for all Group stakeholders.

The activities of the HSE function in this area were heavily restricted during 2020 because of the emergency, which peaked at different times in all geographical areas of Group operations. Nevertheless, Prysmian Group made considerable efforts in terms of central coordination, planning, support and reporting on all initiatives and actions at central and local level, with a view to achieving, step by step, the environmental objectives set for 2022.

In particular, great attention has been dedicated to the reduction of energy consumption and greenhouse gas emissions (GHG) at Group level, the improvement of waste management in order to increase the recycled portion, and the maintenance and improvement of the Health, Safety, Environment and Energy management systems implemented at plant level. In addition, the Group has introduced an internal product assessment criterion (Eco-Cable), based on sustainability criteria that are recognised internationally.

In view of this, during 2020 the Prysmian Group again participated in the CDP - Climate Change section, reporting on our 2019 greenhouse gas emissions (GHG).

At Group level, the percentage of certified Prysmian plants is essentially unchanged with respect to 2019 at 83%¹ for ISO 14001. With a view to certifying the environmental management systems of all Group plants, the HSE function coordinates and updates periodically the ISO 14001 certification program, which will involve many former General Cable plants over the next 3 years.

The commitment of Prysmian and the improvement initiatives launched over the years, with a view to using resources more efficiently and reducing the environmental impact of production processes and products, have already resulted in environmental benefits and cost reductions and, accordingly, the Group will continue efforts to improve continuously its HSE performance. In particular, the HSE function, with the cooperation of other central functions and the operating units, will endeavour to ensure:

- the reporting of increasingly precise and reliable data and information, at Group level, about consumption and greenhouse gas emissions;
- the growing involvement of Group suppliers in monitoring and quantifying the impacts of climate change associated with the Prysmian supply chain;

¹ Data only refer to production sites; however, in addition to these, other types of organisation within the Group are also certified, such as R&D, installation activities, kitting and distribution centres.

- increasingly detailed quantification of the environmental impact of our products throughout their entire life cycle, paying particular attention to the impact of the materials and services acquired;
- the precise collection of data and information about the consumption of specific cable production processes;
- the systematic application of methodologies for calculating the footprint of products (e.g. EPD or carbon footprint/ISO 14067);
- the monitoring of improvement objectives for the future and their eventual updating, with the involvement of all levels of the organization in the planning of the initiatives and activities necessary for the achievement of the stated commitments;
- ongoing implementation of energy efficiency initiatives in compliance with regulations (e.g. Directive 2012/27/EU on Energy Efficiency), the specific campaigns promoted nationally and, more generally, the commitments under-taken at the Paris COP 21 Conference on Climate Change;
- the selection and coordination of specific projects to be implemented in the Group's operating units, with their efforts care-fully calibrated towards local operating requirements.

ENERGY MANAGEMENT

Topic	SASB Code	Accounting metric	2020	2019
Energy Management ²	RT-EE-130a.1.	Total energy consumed in GJ	9,448,439	10,034,549
		Percentage of energy consumed supplied from grid electricity ³	40.2%	46.5%
		Percentage of renewable energy consumed ⁴	22.2%	17.2%

Total energy consumption by the Group fell overall in 2020, mainly due to the decline in plant output caused by the Covid-19 healthcare emergency.

The above figures do not include the Prysmian fleet, comprising three vessels (the Giulio Verne, the Ulisse and the Cable Enterprise). In 2020 Prysmian fleet report a fuel consumption of 293,480 GJ, +3% compared to 2019 (285,237 GJ).

HAZARDOUS WASTE MANAGEMENT

Topic	SASB Code	Accounting metric	2020	2019
Hazardous Waste Management ⁵	RT-EE-150a.1.	Amount of hazardous waste generated in metric tons	10,957	14,184
		Percentage of hazardous waste recycled ⁶	53%	52%

Overall, the quantity of waste produced by the Prysmian Group in 2020 considering both Hazardous and non-hazardous waste has been about 191,000 metric tons, up 13% with respect to 2019; hazardous waste represented 5.7% of the total of waste produced, which was 23% lower than in the prior year.

2 2019 and 2020 figures were estimated for those plants for which data were not reliable (2 plants: Chiplun, in India and Sohar, in Oman). In addition, 2020 data relating to the Sicable site (Ivory Coast) have been estimated on the basis of data collected in the previous year of reporting. In calculating energy consumption from fuels and biofuels, the entity used the Net Heating Values (NHV).

3 Calculation methodology: purchased grid electricity consumption divided by total energy consumption.

4 Calculation methodology: renewable energy consumption divided by total energy consumption.

5 2019 and 2020 figures were estimated for those plants for which data were not reliable (2 plants: Chiplun, in India and Sohar, in Oman). In addition, 2020 data relating to the Sicable site (Ivory Coast) have been estimated on the basis of data collected in the previous year of reporting.

6 Calculation methodology: total weight of hazardous waste generated that was recycled, divided by the total weight of hazardous waste generated

With regard to non-hazardous waste, the types considered in the figures depend on the production needs and the framework used by each plant for waste categorization based on local regulation. In addition, since certain types of waste are production performance indicators, especially scrap metals, the central functions (HSE and Manufacturing) are carrying out ever more detailed checks to align at Group level the way that waste is collected and reported.

The above figures do not include the Prysmian fleet, comprising three vessels (the Giulio Verne, the Ulisse and the Cable Enterprise). In 2020 Prysmian fleet report a total waste production of 746.8 tons (435.7 tons in 2019)⁷. Compared with the prior year, the change in the quantity of waste produced by the shipping fleet was due to using different conversion factors for the specific weight of the waste.

⁷ The waste produced by vessels is disposed of in various ways, depending on the suppliers that collect it in the various ports visited by them.

Human Capital dimension

Prysmian Group is people-centric, supporting and recognising the abilities of those who work for the Group and for the community in which it operates. To achieve this, continuous multi-disciplinary and specialist training programmes have been developed for employees. Out of around 28,000 employees, about one third are stable shareholders. Together with management, these employees own more than 3% of the share capital, investing directly in the Company.

The Group has built its history and successes on the abilities of its employees, who have been leading actors in the achievement of these results. Their ability to transmit values, experience and attachment to the firm to younger colleagues, generation after generation, has proved to be a fundamental driver in the creation of value for the Group for almost 140 years. The “human capital strategy”, launched in 2015 in support of our business strategy, and the growth of the business towards 2020 in terms of our sustainability objectives, guides the development of specific initiatives in this area, based on the following pillars:

- constant improvement and development of the organisational model, consistent with our business strategies and priorities;
- strategic planning of resources in order to ensure, over the medium term, the compatibility of our human capital with the needs of the company in terms of capacity and skills;
- development of employer branding: increase knowledge and awareness of the Prysmian brand as an employer and develop the positioning of the brand in the international job market, partly via strategic recruitment initiatives;
- creation of a strong talent pipeline that ensures the sustainability of the Group’s human resources strategy;
- development of technical, professional and managerial skills via the training initiatives of the Prysmian Academy, which has now been active for eight years;
- meritocracy as a basic element for the development of resources to ensure long-term sustainability;
- development of employee engagement and sense of belonging via a structured approach to measuring the corporate climate, in order to align management and initiatives with the priorities perceived by employees and, in particular, via a broad share ownership programme designed to make most of them shareholders.

Prysmian’s commitment to considering the human dimension as a priority has also been further reinforced when addressing the dramatic effects of the Covid-19 pandemic. In 2020, investment in workplace health and safety rose significantly. Particular efforts were made in distributing health material and protective equipment, the use of rigorous prevention tests, as well as in redefining the procedures regulating workplace access and use and the extensive implementation of remote working. Again, regarding the people dimension, mention should be made of the improvement in the Diversity & Inclusion indicators (+2% compared to 2019) and of our employee satisfaction level (65% in 2020).

Specifically, regarding Occupational Health and Safety, Prysmian Group has always been committed to ensuring that the integrity, health and welfare of workers are safeguarded in their workplaces. The Group has an HSE “Health, Safety, Environment and Energy” policy that commits to compliance with good management practices in order to ensure a safe workplace.

To ensure a systematic and concrete approach to the safety issue, the Group adopts the OHSAS 18001/ISO 45001 health and safety management system at a number of locations (71% of Prysmian plants⁸), although all productive entities make reference to it.

⁸ Data only refer to production sites; however, in addition to these, other types of organisation within the Group are also certified, such as R&D, installation activities, kitting and distribution centres etc.

During 2020, the strategy for the improvement and constant development of the safety culture within the Group was guided by the following VISION: “ZERO injuries in the workplace and in daily life and ZERO professional diseases”. In order to achieve this exceptional goal, we have identified our MISSION: “guide positive, sustained and tangible change in the safety culture of our organisation, as we strive for economic success while recognising our corporate social responsibilities”.

WORKFORCE HEALTH & SAFETY

Topic	SASB Code	Accounting metric	2020	2019
Workforce Health & Safety ⁹	IF-EN-320a.1	Group total recordable incident rate (IF) ¹⁰	1.25	1.31
		Total recordable incident rate (IF) for direct employees ¹⁰	1.30	1.30
		Total recordable incident rate (IF) for contract employees ¹⁰	0.34	1.56
		Group fatality rate	0	0
		Fatality rate for direct employees	0	0
		Fatality rate for contract employees	0	0

The Group’s deep commitment to safety has concretely translated into the reduction of the number of injuries, represented as the IF rate calculated in accordance with the OSHA LTA. This rate was approximately 1.25 at the end of 2020. The number of injuries was 320, of which 316 involving internal staff directly employed by Prysmian and 4 involving external staff.

In addition, with reference to the fleet (comprising three vessels: the Giulio Verne, the Ulisse and the Cable Enterprise), the related HSE data was managed in 2020 with support from an external ship management company. The relevant maritime regulations for ships are the ISM code for safety and the ISPS code for security. Two on-board injuries resulted, with a recordable incident rate of 0.48, in a total of 51 days lost.

⁹ Data includes Prysmian employees (direct and contract), but not the fleet of the Prysmian Group.

¹⁰ Calculation methodology: (total number of accidents with loss of work/hours worked) * 200,000. The calculation of injuries only considers those that occurred in the workplace and not those arising during travel between home and work, unless organised by the Company. In accordance with Prysmian’s internal procedures, the incidents shown (recordable injuries) were those that resulted in being off work for more than 24 hours.

Business Model & Innovation dimension

The Prysmian Group seeks to be the go-to technology player, facilitating the production and transmission of cleaner, more intelligent, more efficient and more competitive energy.

Sustainable Innovation & Lean Manufacturing represent a strategically important pillar in pursuing the creation of sustainable value. The Group's efforts are directed primarily to the adoption of materials with a reduced environmental impact, as well as to the improvement of the cable design to make them more high-performing and sustainable. Lean Manufacturing also means a commitment to making the production structure more efficient and sustainable, through investment in energy efficiency and process digitalization for a gross amount of €246 million.

Group R&D is responsible for the overall innovation strategy, aimed at making Prysmian a key player in the value chain supporting Energy Transition, Digitalization and Sustainability. Globally, Prysmian Group R&D consists of more than 900 professionals, working in 25 R&D centres around the world. Local R&D centres participate actively in new product development, the Design to Cost (DTC) program and the rationalisation of product families. The Design to Cost program represents a tangible initial example of this model. Using the best materials, adopting efficient processes and implementing innovative projects, this program has achieved in 2020 cost savings totaling more than €42 million, with more than 1,800 projects completed at our manufacturing plants.

PRODUCT DESIGN & LIFECYCLE MANAGEMENT

Topic	SASB Code	Accounting metric	2020	2019
Product Lifecycle Management	RT-EE-410a.3.	Revenue (in million Euros) from renewable energy-related and energy efficiency related products	4,836	5,548

This figure, annual revenues from “low-carbon enabling” products, has been calculated based on the sales of Prysmian Group's different business areas at 31 December 2020. All business areas, or those among them, that are classified as “low carbon enabling” have been identified by applying the Taxonomy defined by the Climate Bond Initiative.

As previous year, the revenues attributable to products, using the Climate Bond Initiative Taxonomy, that facilitate the energy transition and achievement of the COP 21 target, as well as the digitalisation of grids, are 48% of total Group revenues.

The Group also announced investment totalling €450 million by 2022 in order to improve further the sustainability of its organisation and supply chain, and accelerate the development of advanced cable technologies, assets and services. The new project, supported by Carbon Trust, seeks to establish scientific carbon reduction objectives for the Prysmian Group, taking into consideration the Scope 1 & 2 (own organisation) and Scope 3 (value chain) GHG emissions. Objectives for the reduction of carbon emissions are considered “Science-Based Targets” if consistent with those deemed necessary by climate science in order to achieve the Paris accord objectives: limit global warming to less than 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C.

MATERIALS SOURCING

Topic	SASB Code	Accounting metric
Materials Sourcing	RT-EE-440a.1.	Description of the management of risks associated with the use of critical materials

The Group's business model, with a global presence in over 50 countries and a high diversification of product applications, is based on a complex supply chain that requires a continuous interface with numerous suppliers of different sizes and cultural background. Without prior investigation and control, the management of a complex supply chain might result in the Group procuring goods and services from suppliers that do not comply with the guidelines embodied in the Group's Code of business conduct, with the risk of supporting suppliers that do not operate in line with international standards. In addition, the Group recognises a responsibility that goes beyond its organisational boundaries and, accordingly, is able to limit any reputational risks by managing the sustainability of its supply chain.

In addition to a commitment to the evaluation of counterparties, the Group has adopted guidelines and policies that suppliers are required to comply with and accept (for example, the Code of Ethics and the Code of Business Conduct). There will be an immediate reaction should it emerge that third parties involved in the supply chain have implemented actions not conforming to the principles of environmental and social sustainability, which would expose the Group to potentially significant image and reputational risks. If the issues flagged are not promptly corrected and eliminated, the Group reserves the right to activate a procedure for the termination of existing business activities and temporary, or in serious cases, definitive exclusion from the Group's supplier list.

With respect to critical materials that the Group sources specifically, Prysmian Group enforces a Conflict Minerals Policy, with the aim of guaranteeing a "Conflict-free" supply chain that doesn't contribute to the on-going armed clashes in conflict-affected and high-risk areas.

This is done through the following activities:

- Identification of purchased materials/semi-finished products containing 3TG (tin, tungsten, tantalum and gold);
- Requesting all incumbent and new recurring suppliers of products containing said materials to provide the Conflict Minerals Reporting Template (CMRT), as per the latest version developed by the Responsible Minerals Initiative (RMI) (through formats and international standards);
- Analysis of information received for red-flags and inconsistencies and implementation of corrective actions.

In 2020, considering the 4 minerals covered by the Conflict Materials Policy, the Group purchased limited quantities of tin. Analysis of 48 suppliers of tin to the Group identified their original sources, comprising 68 different smelters; of these, 65 are certified "DRC Conflict-free" by the RMI. The remaining 3 were subject of an analysis in accordance with instructions issued by the RMI ("Reasonable Country of Origin Inquiry"). Overall, the investigation did not identify any risk in this area.

In France has been implemented in previous years a system based on the specially developed SAP transaction aimed to report the presence of hazardous substances in every single cable item, extended in 2020 to Italy, Spain and Germany, as planned. The system tracks the presence of hazardous substances based on Reach / Rohs regulations but is applicable also for monitoring other type of substances requested by specific industry regulation (automotive, OEMs ...) and allows the identification of the cable items for which the hazardous substance exceeds the maximum allowed limit. Based on the above

mentioned system and within the wider activity related to the development of the Eco-Label rating system, a special application has been developed by IT in order to allow the tracking of dangerous substances in cables for every Prysmian Groups affiliate where the IT systems are currently live.

Furthermore, in order to manufacture certain safety cables and make them fire resistant, Prysmian purchases limited quantities of a few types of glass-based tape that contain small quantities of mica through both producers and distributors. The Mica mineral is not used directly in the Group's products and production processes. The extraction process for this mineral is considered to be at risk of under-age working, especially in geographical areas like India and Madagascar where large quantities are mined (For Prysmian Group, Mica mines are tier 4/5). The Group tackled this issue by requesting since 2016 all suppliers to provide detailed information about Mica mineral sources and related "Child Labor-free" certifications. To date over 80% of the Mica mineral supply base has been assessed child labor-free, moreover on the remaining 20% investigation is continuing with the aim of phasing out suppliers unable to provide the requested certification.

Leadership & Governance dimension

Prysmian Group seek to uphold the highest standards of fair and ethical practice in every action taken across all area in which operates.

Prysmian Group is, in primis, a public company with a broad shareholder base and, as such, it is fundamental to align the interests of the Group with those of all stakeholders. This special nature requires an ability to develop open and transparent dialogue with our shareholders, employees, customers and suppliers, with the institutions and with the communities in which we work. Prysmian Group has always invested in these values, striving to comply with the highest international standards of governance. For example, 67% of Board members are independent and 42% are women. Ethics and Integrity as corporate values are expressed using a series of instruments and policies disseminated throughout the entire organisation, including: the Code of Ethics, the Anti-Corruption policy, privacy and data protection, and the helpline programme.

This is supported by Group Compliance Policies (including an Anti-Bribery Policy and Antitrust Code of Conduct, among others) designed to ensure adherence from our employees, suppliers, business partners, sales agents, sub-contractors and distributors on the Prysmian way of doing business.

BUSINESS ETHICS

Topic	SASB Code	Accounting metric
Business Ethics	RT-EE-510a.1.	Description of policies and practices for prevention of: (1) corruption and bribery and (2) anti-competitive behavior
	IF-EN-510a.3.	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behavior in the project bidding processes

The Prysmian Group puts in place a series of organisational tools aimed at defining the principles of legality, transparency, fairness and loyalty used to operate. In particular, the Group:

- has adopted a Code of Ethics containing guidelines and ethical and behavioural principles that all those carrying out activities on behalf of Prysmian or its subsidiaries are required to observe (including managers, officials, employees, agents, representatives, external collaborators, suppliers and consultants);
- through the Internal Audit & Compliance Department, constantly monitors compliance and the concrete application of these rules, not tolerating any type of violation.

The Code of Ethics complies with international best practices and adopts the principles embodied in the UN Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation (ILO). The structure of the Prysmian Group's Code of Ethics, in its latest version of 1 August 2019, is founded on three pillars:

- Ethics in business activities;
- Ethics in internal relations;
- Ethics in environmental and social matters.

We recommend referring to the Prysmian Group website for further insights to these three pillars. All companies within the Group strictly comply with the Code of Ethics, applicable regulations and the

rules and procedures adopted from time to time by the Group. In order to ensure the widest possible distribution of its contents, the Code of Ethics is available in 26 languages and is also published on the Company's website, www.prysmiangroup.com.

The Code of Ethics is supported by other Group Compliance Policies, included:

- **ANTI-CORRUPTION POLICY:** prohibits the corruption of both public officials and private individuals for any reason to influencing a business decision to obtain or retain an improper business advantage (including but not limited to winning a bid submission or contract, obtaining a sale, procuring licenses). Furthermore, the Policy requires Prysmian's employees to abide by it and to observe and comply with all anti-corruption legislation in force in the countries in where they are employed or active, if these are more restrictive.
- **ANTI-TRUST REGULATIONS:** the Board of Directors has adopted an Anti-trust Code of Conduct that all directors, executives and employees of the Group are expected to know and comply with in the performance of their duties and in relations with third parties. As with the other policies, the Antitrust Code of Conduct was also updated following the acquisition of General Cable, in order to have a document, valid for the entire Prysmian Group, that provides an overview of the problems associated with applying the antitrust regulations and the consequent principles of conduct to be followed. In addition, more detailed documents were also adopted covering the antitrust regulations in force within the European Union, North America, China and Australia. Furthermore, concerning the participation in bidding process is specified the prohibition of coordination between competing companies. More specifically, any exchange of information concerning bidding terms, as well as the decision of whether to participate in the tender, is prohibited.
- **HELPLINE POLICY:** The new policy reiterates the importance of communications within the Group, guaranteed by the anonymity available to the reporter, as well as the ban on reprisals against those who report violations. With the formalization of the Helpline Policy — previously known as Whistleblowing Policy - has been established dedicated and secure channels (including telephone lines and a web portal) for individuals who wish to report professional misconduct. These channels are managed by an external independent company, NAVEX Global, which has a binding mandate to protect the identity of all who use the Helpline. They also act as an intermediary to relay any required follow-up information, related questions and answers, as well as information about the resolution of the case. Alongside these channels, has been formed a Helpline Committee. This operates to accurately evaluate any reports, perform specific investigations into cases where required, and adopt coherent and appropriate measures.

The compliance policies (Code of Ethics, Global Compliance, Helpline, Anti-Corruption, Gifts & Entertainment, Third-Party Program, Antitrust, Antitrust EU, Conflicts of Interest, Export Control) have been published on the corporate intranet and are available in the official languages of the Prysmian Group.

Topic	SASB Code	Accounting metric	2020	2019
Business Ethics	RT-EE-510a.2.	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	-	-
	RT-EE-510a.3.	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	€ 112 million (*)	
	IF-EN-510a.2.	Total amount of monetary losses as a result of legal proceedings associated with charges of bribery or corruption	-	-
		Total amount of monetary losses as a result of legal proceedings associated with charges of anti-competitive practices	€ 112 million (*)	

(*) For more details with respect to the amount of monetary losses as a result of legal proceedings associated with charges of anti-competitive practices, please refer to the details below in the section "Anti-trust".

Anti-corruption

There were no cases of corruption within the Prysmian Group during the two-year period 2019-2020.

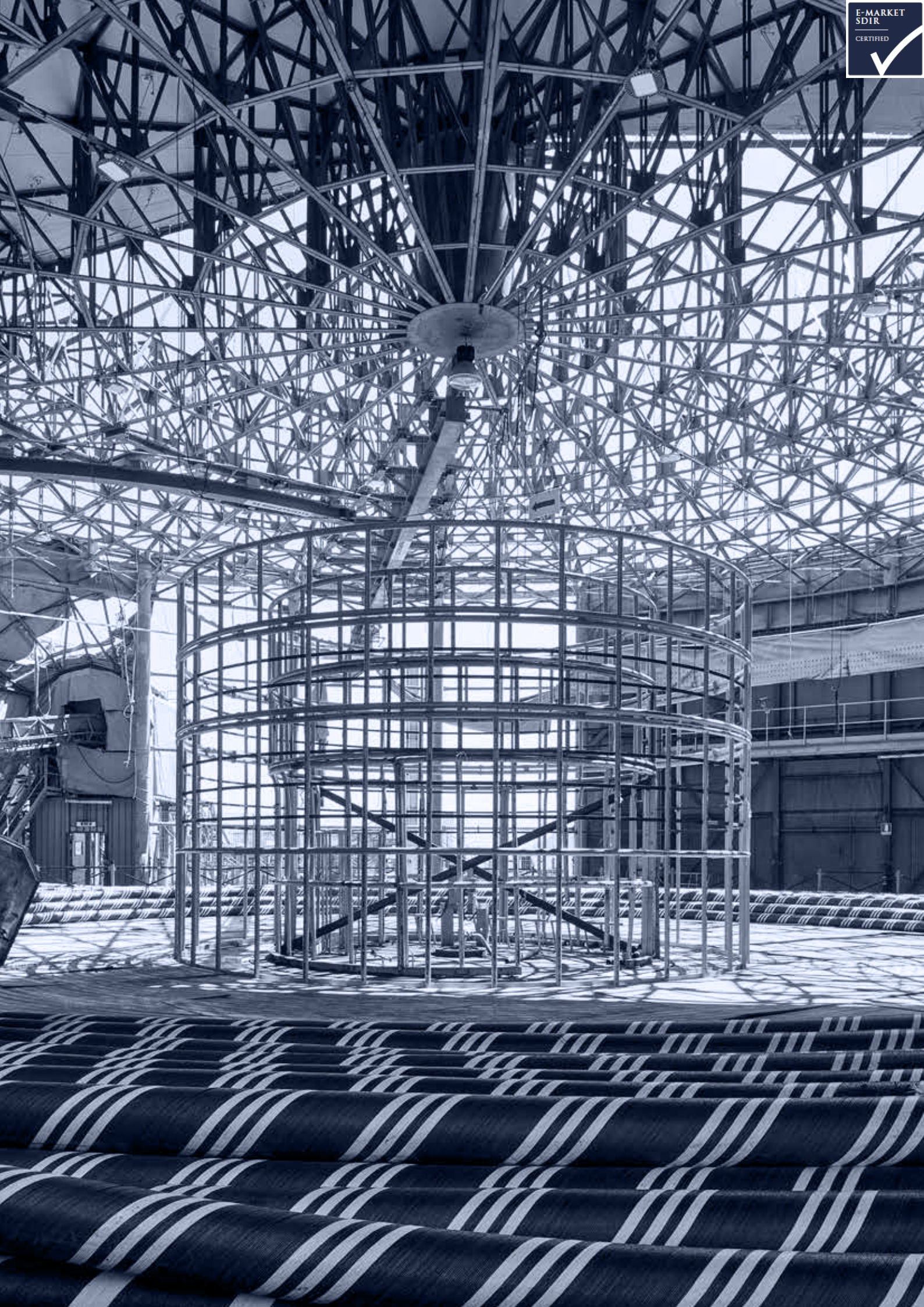
With regard to and in accordance with the three-year non-prosecution agreement (“NPA”) signed by General Cable with the U.S. Department of Justice (“DOJ”) in December 2016 and the related disclosure made to the U.S. Securities and Exchange Commission (“SEC”) regarding violations of the U.S. Foreign Corrupt Practices Act (“FCPA”), Prysmian submitted the final report to the above Authorities at the end of 2019 without receiving any requests for clarification. Furthermore, the DOJ and the SEC did not raise additional matters with regard to the above during 2020.

Anti-trust

On 15 April 2020, the Prysmian Group disclosed that, in the context of proceedings commenced in 2011, the Court of the Brazilian Competition Authority (CADE) had issued a ruling on the alleged anticompetitive practices of the Prysmian Group in the Brazilian market for high voltage terrestrial and submarine cables. The Court held the Prysmian Group responsible for such practices between February 2001 and March 2004 and sentenced it to pay a fine of BRL 10.2 million (about Euro 1.8 million), which is in line with the provisions recorded by the Group for this specific matter. The Prysmian Group has appealed against this ruling made by CADE.

On 24 September 2020, the Group disclosed that the European Court of Justice had ruled on the appeal filed by Prysmian S.p.A. and Prysmian Cavi e Sistemi S.r.l. against the ruling of the European Court dated 12 July 2018 which, as notified to the market on that day, had upheld the decision made of European Commission dated 2 April 2014 following an anti-trust investigation into the markets for high voltage terrestrial electricity cables and for submarine electricity cables. In this ruling the Court rejected the appeal filed by the Group companies, thus confirming the responsibilities and fine specified in the original decision. In addition, during 2020, the Group made additional payments following the settlement of certain disputes promoted by third parties seeking the reimbursement of alleged losses incurred as a consequence of Prysmian’s participation in the anti-competitive conduct penalised by the European Commission (follow-on cases), as well as for legal expenses. The total cash outflow in relation to the above matters, including therefore payment of half the fine imposed by the European Commission, was about Euro 112 million.

With regard to the antitrust investigations still underway, details on which are provided in section “Provisions for risks and charges” of the Explanatory Notes to the Consolidated Financial Statements 2020, it should be noted that the Group’s provisions for risks and charges amounted to approximately €120 million at 31 December 2020. Despite the uncertainty of the outcome of the investigations and legal action in progress, the amount of this provision is considered to represent the best estimate of the liability based on the information now available.



Annex

SASB DIMENSION REPORTED IN THE REPORT ¹¹

Environment	This dimension includes environmental impacts, either through the use of nonrenewable, natural resources as inputs to the factors of production or through harmful releases into the environment that may result in impacts to the company's financial condition or operating performance.
Human Capital	This dimension addresses the management of a company's human resources (employees and individual contractors) as key assets to delivering long-term value. It includes issues that affect the productivity of employees, management of labor relations, and management of the health and safety of employees and the ability to create a safety culture.
Business Model and Innovation	This dimension addresses the integration of environmental, human, and social issues in a company's value-creation process, including resource recovery and other innovations in the production process; as well as in product innovation, including efficiency and responsibility in the design, use phase, and disposal of products.
Leadership and Governance	This dimension involves the management of issues that are inherent to the business model or common practice in the industry and that are in potential conflict with the interest of broader stakeholder groups, and therefore create a potential liability or a limitation or removal of a license to operate. This includes regulatory compliance, risk management, safety management, supply-chain and materials sourcing, conflicts of interest, anticompetitive behavior, and corruption and bribery.

¹¹ Reference: SASB Materiality Map ([link](#)).

SASB DISCLOSURE INDEX

The SASB's sector Standard "Resource Transformation — Electrical & Electronic Equipment" (SASB code RT-EE) is the primary SASB standard relevant for Prysmian according to SICS® Look-up Tool¹². In addition, three accounting metrics of the SASB's sector Standard "Infrastructure - Engineering & Construction Services" (SASB code IF-EN), considered relevant for the Group to be reported, have been identified. All other accounting metrics part of the "Infrastructure – Engineering & Construction Services" sector are omitted due to lack of applicability or relevance. The tables below contain the list of accounting metrics reported in the Report.

TABLE 1. "RESOURCE TRANSFORMATION – ELECTRICAL & ELECTRONIC EQUIPMENT" SUSTAINABILITY TOPICS & ACCOUNTING METRICS¹³

Topic	SASB Code	Accounting Metric	Page	Comments
Energy Management	RT-EE-130a.1.	1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	10	
Hazardous Waste Management	RT-EE-150a.1.	Amount of hazardous waste generated, percentage recycled	10-11	
Hazardous Waste Management	RT-EE-150a.2.	Number and aggregate quantity of reportable spills, quantity recovered	ND	Information not available, to be evaluated for 2021 Report
Product Safety	RT-EE-250a.1.	Number of recalls issued, total units recalled	ND	Not applicable to Prysmian Business
Product Safety	RT-EE-250a.2.	Total amount of monetary losses as a result of legal proceedings associated with product safety	ND	Information not available, to be evaluated for 2021 Report
Product Lifecycle Management	RT-EE-410a.1.	Percentage of products by revenue that contain IEC 62474 declarable substances	ND	Information not available, to be evaluated for 2021 Report
Product Lifecycle Management	RT-EE-410a.2.	Percentage of eligible products, by revenue, that meet ENERGY STAR® criteria	ND	Not applicable to Prysmian Business
Product Lifecycle Management	RT-EE-410a.3.	Revenue from renewable energy-related and energy efficiency related products	14	
Materials Sourcing	RT-EE-440a.1.	Description of the management of risks associated with the use of critical materials	15-16	
Business Ethics	RT-EE-510a.1.	Description of policies and practices for prevention of: (1) corruption and bribery and (2) anti-competitive behavior	17-18	
Business Ethics	RT-EE-510a.2.	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	18-19	
Business Ethics	RT-EE-510a.3.	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	18-19	

¹² The tool (<https://www.sasb.org/find-your-industry/>) allows to determine the primary industry for companies listed around the world, enabling investors and corporations to determine which SASB sustainability accounting standard is applicable to that company.

¹³ ND = not disclosed.

TABLE 2. "RESOURCE TRANSFORMATION – ELECTRICAL & ELECTRONIC EQUIPMENT" ACTIVITY METRICS

Topic	Activity Metric	Page	Comments
RT-EE-000.A	Number of units produced by product category	8	Covered with the revenues by business area as more relevant metric for Prysmian business
RT-EE-000.B	Number of employees	7	

TABLE 3. "INFRASTRUCTURE – ENGINEERING & CONSTRUCTION SERVICES" SUSTAINABILITY TOPICS & ACCOUNTING METRICS DISCLOSED IN THE REPORT AS RELEVANT FOR THE GROUP

Topic	SASB Code	Accounting Metric	Page	Comments
Business Ethics	IF-EN-510a.2.	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anticompetitive practices	18-19	
Business Ethics	IF-EN-510a.3.	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behavior in the project bidding processes	17-18	
Workforce Health & Safety	IF-EN-320a.1.	1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	13	



Independent Auditors' Report



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Independent auditors' report on the "SASB Report 2020"

To the Board of Directors of
Prysmian S.p.A.

We have been appointed to perform a limited assurance engagement on the "SASB Report 2020" of Prysmian Group (hereinafter also "the Group") for the year ended on 31st December 2020 (hereinafter "SASB Report").

Responsibilities of Directors for the SASB Report

The Directors of Prysmian S.p.A. are responsible for the preparation of the SASB Report in accordance with the "Engineering & Construction Services Sustainability Accounting Standards 2018" and with the "Electrical & Electronic Equipment Sustainability Accounting Standards 2018" defined by SASB - Sustainability Accounting Standards Board (hereinafter "SASB Standards"), as described in the paragraph "Methodological Note" of the SASB Report.

The Directors are also responsible for that part of internal control that they consider necessary in order to allow the preparation of a SASB Report that is free from material misstatements caused by fraud or not intentional behaviors or events.

Auditors' independence and quality control

We are independent in accordance with the ethics and independence principles of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. Our audit firm applies the International Standard on Quality Control 1 (ISQC Italia 1) and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

Auditors' responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the SASB Report with the requirements of the SASB Standards. Our work has been performed in accordance with the principle "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the SASB Report is free from material misstatements.

Therefore, the extent of work performed in our examination was lower than that required for a full examination according to the ISAE 3000 Revised ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the SASB Report were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information

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included in the SASB Report, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis of the identification process of the applicable SASB Standards' Topics and Accounting Metrics performed by the Prysmian Group;
2. analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the SASB Standards;
3. comparison of the economic and financial data and information included in the SASB Report with those included in the Prysmian Group's consolidated financial statements;
4. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the SASB Report.
In particular, we have conducted interviews and discussions with the management of Prysmian S.p.A. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the SASB Report.

Furthermore, for significant information, considering the Group activities and characteristics, at group level:

- o with reference to the qualitative information included in the SASB Report, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidence;
- o with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.

Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the SASB Report of the Prysmian Group for the year ended on 31st December 2020 has not been prepared, in all material aspects, in accordance with the requirements of the SASB Standards, as described in the paragraph "Methodological Note" of the SASB Report.

Other aspects

Comparative data presented in the SASB Report with respect to year ended on 31st December 2019, have not been subject to verification.

Milan, 1st April, 2021

EY S.p.A.

Pietro Carena
(Auditor)



Prysmian
Group

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