

Corporate Citizenship and Philanthropy Policy

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1. Foreword

As declared in its Sustainability Policy, Prysmian Group is committed to contributing to the socio-economic development of the communities in which it operates, aware of the effects that its business can generate on the countries and economies in which it carries out its activities. It has therefore decided to adopt a policy regarding all the measures designed to meet the needs of communities and civil society, in line with the vision, mission, values, Code of Ethics and Policies put in place by the Group.

The objective of this policy is to define common rules that are shared within all Prysmian Group Companies in order to identify corporate citizenship and philanthropy activities related to the Group's business operations. The aforesaid activities are implemented as part of the Sustainability Plan defined by the Group in order to identify priorities, goals and concrete actions that aim to meet the targets contained in the Prysmian Group's Sustainability Scorecard.

2. Definition and classifications

Prysmian Group has decided to adopt the guidance of the London Benchmarking Group¹ with reference to the definition to be adopted for "Corporate Community Investment":

"Companies engage in activities that can have a positive impact on society every day. Over and above these activities [...] companies often contribute to community-based organizations and engage in activities to help address a range of wider issues and causes in the communities where they do business. [...] This specific voluntary engagement with charitable organizations or activities that extends beyond companies' core business activities is broadly what is meant by CCI."

Prysmian Group believes that access to energy and telecommunications is a basic prerequisite for the economic and social development of local communities and countries. For this reason, the corporate citizenship and philanthropy activities promoted by the Group must be aimed primarily at supporting initiatives with these goals in mind.

In general, Prysmian Group considers community support initiatives to be those that involve:

¹Group of companies (more than 100) based in the United Kingdom, which have been actively collaborating since 1994 to develop this model.

- **Long-term initiatives benefiting the community:** long-term initiatives that aim to mitigate socio-environmental problems present in the communities in which the Group operates, such as, for example, taking out membership of organisations/associations active in the social and environmental field and in the development of the community;
- **Donations:** one-off contributions to third parties (organisations, non-profit entities, or private individuals) and short-term humanitarian, cultural, social and sporting initiatives which aim to create added value in ethical, civil and moral terms;
- **Commercial initiatives benefiting the community:** initiatives other than those typically dedicated to sustainability issues (e.g. marketing, communications, R&D), directly supporting the Company's success (and also its reputation) and carried out in collaboration with socially-oriented organisations. For example: sponsorships, cause-related marketing activities supporting scientific research with commercial implications.

Prysmian Group recognises the three main types of contributions indicated below:

- **Cash contributions:** costs incurred by the Group to contribute to a project or community initiative, including the costs of advertising or marketing campaigns;
- **Labour time:** this is a cost for the Group that indirectly helps support social aims through the hours paid to employees involved in charity activities. This item does not include the time spent by employees on supporting social activities outside working hours and the business environment;
- **Donation in kind,** namely the donation of products, equipment or other tools, free or temporary advertising space in a publication or on the website, which the Company allows the charity organisation or association to use. These contributions have to be included and valued using estimates since they represent a cost incurred by the organisation (these costs refer to the cost incurred by the company and not to market value).

3. Guiding principles and operating procedures

3.1. Guiding principles

The choice of which activities to support meets specific defined criteria designed to improve the process and avoid requests that are not in line with the Group's mission, vision, values, Code of Ethics, strategic guidelines, the policies put in place and the Organisational Model pursuant to Legislative Decree 231/2001.

What can be funded:

- **Educational and youth support:** this category includes contributions to schools, universities and educational establishments in general, or to any organisation working for young people and their needs.
- **Health and prevention:** this category includes all activities that support hospitals, or health and prevention in general. Activities supporting scientific and medical research and school-based training on topics regarding the activities carried out by Group companies.
- **Economic development:** support to activities that promote economic development and help businesses in the areas where the Group operates.
- **Environment:** initiatives to protect the environment and raise awareness about topics such as climate change, energy saving, waste recycling and pollution. This category does not include the costs incurred by the Group in the routine management of the environmental impact of its business activities.
- **Art and culture:** initiatives designed to develop and preserve the artistic, historical and cultural heritage of the area where the Group operates.
- **Sport:** supporting athletes and sporting initiatives at local and non-local level, which may in some way represent the Group's values.
- **Community and social welfare:** supporting associations working on social issues and initiatives designed to assist people who are disadvantaged or in difficulty.
- **Emergencies:** contributions and support for populations who have suffered harm as a result of natural disasters, war, etc.
- **Other support:** all other activities not specified in the previous points that have a social purpose.

What cannot be funded:

- Activities that are in any way illegal, dangerous or harmful for the Group and its reputation;
- Activities in conflict with the Group's mission, vision, values, Code of Ethics, strategic guidelines, policies put in place and the Organisational Model pursuant to Legislative Decree 231/2001.

The Group also prohibits:

- promising or paying sums of money, promising or granting goods in kind or other benefits to third parties, such as, for example, customers, suppliers, Public Administration Bodies, public institutions or other organisations with the aim of promoting or favouring the Group's interests;

- resorting to other forms of aid or contributions which, in the guise of sponsorships, appointments, consultancy or advertising, have the same purpose as those prohibited above.

3.2. Operating procedures

By November each year, at the same time as the process to finalise the management plan for the coming year, the list of initiatives due to be carried out the following year is formalised for the donations and sponsorships authorisation process. For this purpose, one of the tasks of the local offices/other Functions/business Departments is to send, for the approval process, a formal request (containing, at least, evidence of the value, beneficiary, reason and frequency of the initiative) to:

- **Local Compliance & Internal Audit Function (or, where absent, at Corporate level)**, to obtain its approval to proceed regarding the beneficiary's ethical nature, also following anti-bribery and anti-corruption screening;
- **Local Taxation Department (or, where absent, at Corporate level)**, to check the tax treatment of the amounts to be disbursed and the formalities to be followed, designed to define the overall economic impact of the proposal;
- **Local Communications or Market Intelligence and Trade Marketing Departments (or, where absent, the Corporate and Business Communications Department)**, to assess whether the initiative is in line with the guiding principles set out above.

After this process, all the donation initiatives, irrespective of their amount, have to be formally approved by the Company CEO of the applying local offices/other Functions/business Departments.

The beneficiary of any sponsorships will have to formally undertake to comply with the ethical conduct principles adopted by the Group.

Initiatives that are strategic or have a significant economic impact, irrespective of their amount, are brought to the attention of the Group CEO.

4. Follow-up and communication

The Group's Corporate and Business Communications Department monitors its own corporate citizenship and philanthropy activities, also with reference to the level achieved for any sustainability goals. It also undertakes to disclose these activities, using tools such as, for example, its Consolidated Disclosure of Non-financial Information/Sustainability Report and/or the Group's website.

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