

# HELPLINE POLICY

APPROVED BY  
PRYSMIAN S.p.A BOARD OF DIRECTORS  
July 31, 2024

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## LEADERSHIP MESSAGE

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

Read and understand the Code of Ethics particularly noting the sections related to your Function, work situation and area. In addition to the many tools, resources and policies referenced in the Code of Ethics and in this Policy, you will also find a number of people you can turn to for assistance.

If anything is unclear in the Code of Ethics or in any Company Compliance policy, we invite you to reach out to the Group Compliance Function, whereas if you have a concern that you would like to raise, you can avail of every reporting channel indicated in this Policy. Only by asking a question or reporting a concern can a potential situation be promptly and effectively addressed.

You can be assured that your questions and concerns will be taken seriously, handled confidentially and that you will not be retaliated against in any form because you asked a question or reported a concern that you had reasonable ground to believe is true.

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

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

**Massimo Battaini**

**Prysmian CEO**

## 1. PURPOSE & OBJECTIVE

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

This Policy, the **Whistleblowing Management System** and its processes are based upon the standards set by the ISO:37002 guidelines and the applicable laws and regulations, including – but not limited to – the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (hereinafter, “**Whistleblowing Directive**”).

## 2. POLICY OWNER

Group Compliance, acting as Whistleblowing Management Function according to the ISO:37002 guidelines, owns this Policy and is responsible for periodically reviewing and updating it to ensure it accurately reflects applicable regulatory, best practice, or business developments.

The Whistleblowing Management Function has the responsibility and authority for:

- a) The design, implementation, management and monitoring of the Whistleblowing Management System;
- b) Ensuring that the Whistleblowing Management System is designed and resourced to ensure: (i) comprehensive assessments of reports and potential risks; (ii) impartial and timely investigations and (iii) appropriate protection and support measures;
- c) Ensuring, to the maximum extent possible in the organization, that investigation and protection functions are delivered independently (i.e., provided by different persons or areas), while recognizing that each may be assigned to existing functions;
- d) Providing advice and guidance on the Whistleblowing Management System and issues relating to reporting wrongdoing;
- e) Reporting on a planned and *ad hoc* basis on the performance of the Whistleblowing Management System to the governing bodies, top management, and other relevant Functions, as appropriate (e.g. Helpline Committee, Control and Risk Committee, Board of Directors, Supervisory Bodies pursuant to Decree 231).

It is the responsibility of the Whistleblowing Management Function to ensure the integrity, impartiality, authority, transparency, and independence of the whistleblowing management system and its processes.

The Whistleblowing Management Function has direct, unrestricted, and confidential access to top management and the governing bodies.

### 3. APPLICABILITY

This Policy applies to all interns, Employees, officers, directors of all legal entities of Prysmian, notwithstanding the possibility to raise a concern is extended to any third party that acquired information on breaches through work-related activities with Prysmian (i.e., shareholders, sales agents, suppliers, customers, former Employees, job applicants and volunteers) (jointly referred to as “**Prysmian Stakeholders**”).

The applicability of this Policy has also been determined in order to respond to the needs and expectations of Prysmian's Stakeholders regarding the helpline management system implemented by the Company. In this sense, below are the Prysmian Stakeholders that have been considered most relevant pursuant to the ISO:37002 guidelines - Whistleblowing Management System, and the respective interests they hold:

- a) Shareholders and financial institutions: they are interested in the creation of economic value, risk management and information transparency and, as such, require the Company to promote a corporate culture oriented towards open reporting.
- b) Public administrations: they are interested in establishing collaborative relationships with the Company based on compliance with current legislation and the possibility of activating reporting mechanisms in the presence of possible violations.
- c) Local communities: they believe in access to information, in conducting business in an ethical manner, in the protection of the environment and safety, as well as in being able to effectively present their requests, also through specific reporting channels made available by the Company.
- d) Employees, officers, managers, directors, candidates: they have an interest in business ethics and integrity and, in particular, they believe in compliance with external and internal standards by the organization for which they carry out their

activity and believe in a work environment that allows them to report any possible violations.

- e) Suppliers, contractors, sales agents, customers, and other business partners: they expect to establish business relationships with the Company based on compliance with current regulations and to have the possibility of being able to report to the Company any violations occurring within the contractual relationship.

#### **4. YOUR RESPONSIBILITY AS AN EMPLOYEE**

This Policy requires you to:

- a) Read, understand, and comply with the requirements included in this Policy.
- b) Comply with Prysmian's Code of Ethics and any other applicable policies or procedures.
- c) Report immediately to your Regional Compliance Team or the [Prysmian Integrity First Helpline](#) if you observe, or suspect, any violation of this Policy either by a Prysmian Employee or a third party working on behalf of the Company.
- d) Ask questions or report any concerns related to this Policy.
- e) Complete assigned training related to this Policy when required.

#### **5. POLICY REQUIREMENTS – RULES OF CONDUCT**

Prysmian officers, directors, managers and supervisors must always:

- a) Act as ethical role models.
- b) Be always available to receive concerns/questions, offering support and guidance.
- c) Foster a positive working environment where respect is paramount and where diversity of opinion is welcome.
- d) Encourage an open reporting environment where Prysmian people feel comfortable in asking questions or reporting concerns.
- e) Timely and appropriately escalating issues or concerns when necessary.
- f) Make sure any corrective action taken is consistent with Company policies and procedures.
- g) Identify key risks and ensure your direct reports receive the necessary training and equipment that Employees need to work safely and in compliance with the law.

## 6. HELPLINE – KEY CONCEPTS

### 6.1 How to Report a Concern

In compliance with best practices, including the ISO:37002 guidelines, the latest legal and regulatory requirements and with the aim of disseminating an open-reporting culture within the workplace, Prysmian has implemented several channels through which it is possible to raise a concern.

#### Prysmian Integrity First Helpline

First and foremost, Prysmian has implemented a dedicated and secure Group reporting channel, known as Prysmian Integrity First Helpline (“**IF Helpline**”), that is managed by an external independent company which has a binding mandate to protect the identity of all who use the IF Helpline and to preserve the confidentiality of the reported concerns.

Any concern raised through the IF Helpline will be exclusively visible to the Group Compliance and Internal Audit Functions.

The IF Helpline is available 24 hours a day, 7 days a week, in all of Prysmian Group’s languages and offers several means allowing any Company Employee and/or Prysmian Stakeholder to report a concern or ask a question:

- a) E-mail: [Helpline@prysmian.com](mailto:Helpline@prysmian.com);
- b) Internet: [www.prysmiangroup.ethicspoint.com](http://www.prysmiangroup.ethicspoint.com);
- c) Telephone: refer to Appendix C for country-specific phone numbers.

It is also possible to access the [IF Helpline](#) dedicated web-page directly through the Ethics & Integrity section of the [Corporate website](#) and in the corresponding section of [Company's Intranet](#), accessible to Employees. Any concern raised through the Integrity First Helpline will be exclusively visible to the Group Compliance and Internal Audit Functions.

#### Group Compliance and Internal Audit

Furthermore, any Company Employee may contact the competent Regional Compliance Team or the Internal Audit Function, by sending an e-mail, via phone or requesting a face-to-face meeting. It must be understood that in case a Company Employee who is not part of such Functions receives either a written or verbal Helpline concern/issue, he/she must:

- a) Treat the matter confidentially and protect any personal data/information
- b) Communicate to the whistleblower that he/she is required to report the concern to the Integrity First Helpline or to the other available channels.

#### Local Helpline Contact Point

In compliance with the Whistleblowing Directive and the related transposition measures, in any EU Member State where we employ cumulatively more than 249 employees, we have established – in addition to the IF Helpline – a local channel through which it is possible to raise a concern (either verbally, in writing or personally requesting a face-to-face meeting), that offers appropriate guarantees of independence, confidentiality, data protection and secrecy and ensures the absence of language barriers.

For the list of such countries and the contact details of each Local Helpline Contact Point, please see Appendix D. Concerns can be addressed to the Local Helpline Contact Points also directly through the [IF Helpline](#) dedicated web-page.

#### Supervisory Body pursuant to Legislative Decree no. 231/2001 (“Decree 231”)

For the Italian legal entities, it is also possible to report to the competent Supervisory Board (“Organismo di Vigilanza”) any relevant concern pursuant to the Italian Legislative Decree no. 231/2001.

### **6.2 Concerns to be Reported**

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

- a) Financial or accounting fraud;
- b) Behaviors not compliant with controls;
- c) Bribery & corruption;
- d) Human right issues, including child and forced labor;
- e) Harassment, intimidation or discriminatory conduct;
- f) Health, safety and environment matters;
- g) Falsification of records;
- h) Conflicts of Interest.

It is not necessary for the reporter to have observed the violation or have factual documents to support it. A valid and legitimate suspicion is sufficient to report a potential violation or concern, provided that, in light of the circumstances and the information available at the time of reporting, the whistleblower has reasonable grounds to believe that the matters reported are true.

On the contrary, those who deliberately and knowingly report wrong or misleading information do not enjoy protection and may be subject to disciplinary measures.

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

Responsibility over the investigation is exclusive to Group Compliance, ensuring adequate information to the Internal Audit Function, as needed. It is understood that, where the concern is addressed to the Local Helpline Contact Point, it is the latter to be responsible of the investigation.

You are also required to immediately report a concern to the Group Compliance and Corporate Affairs Functions if you have been notified of an investigation, lawsuit or other inquiry by a regulatory authority or other external party. Such notifications can come in various forms, including written and verbal requests for information or written notification.

Immediate notification is essential to ensure any privileged documents are appropriately protected and documents relating to the investigation, lawsuit, or other inquiry are properly retained. Facts for which on-going investigations by public authorities are known or subsequently become known to exist will not be treated under the provision of this Policy.

### **6.3 External Reporting of Concerns**

#### Outside Authorities

Nothing in this Policy prohibits a Prysmian Stakeholder or an authorized subject from reporting potential violations to any governmental agency/entity or competent public authorities, to the extent permitted by the applicable laws and regulations. Employees do not need Prysmian's prior authorization to make any such reports or disclosures and are not required to notify Company that such disclosures have been made.

Pursuant to the Whistleblowing Directive, for the list of the main competent authorities designated in each EU Member State and the respective contact details, see Appendix D.

#### Public Disclosure

To the extent permitted by the applicable laws and regulations, it is also possible to make a public disclosure of the report (e.g. through online platforms or social media, or to the media, elected officials, trade unions or professional and business organizations), provided that the following – minimum – criteria are met:

- a) the person has previously reported through the appropriate channels (both internal and/or external) without any appropriate and timely action/response taken.
- b) or the person has reasonable grounds to believe that: (i) the breach may constitute an imminent or manifest danger to the public interest; or (ii) there is a risk of retaliation, or a low prospect of the breach being effectively addressed.

#### **6.4 Data Collected and Processed**

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

The personal data processed within the investigations should be limited to the data strictly and objectively necessary to verify the allegations made. If accidentally collected, personal data that are manifestly not relevant for the handling of a specific report are deleted without undue delay. Incident Reports are kept separate from other personal data.

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

#### **6.5 Guarantee of Confidentiality**

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

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

The reporter's identity and the facts reported will be kept confidential at all the stages of the process and will not be disclosed to any Company employee or third parties but may need to be disclosed to public authorities or relevant people in case of needs resulting from the additional investigations.

## **6.6 No Retaliation**

Any form of retaliation, including threats and attempts of retaliation, is strictly prohibited. Prysmian is committed to ensuring that all Employees are free to disclose any violation, either real or suspected, of the Prysmian Code of Ethics or any other Company policy or procedure, to the extent they have reasonable grounds to believe that the matters reported are true. Reporters will not be adversely impacted or retaliated upon in the workplace, either personally or professionally, for raising a valid and legitimate concern.

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

- a) Harassment, coercion, intimidation, or ostracism.
- b) Discrimination or unfair treatment.
- c) Discipline measures.
- d) Suspension or dismissal.
- e) Denial of promotion, benefits or pay.
- f) Negative performance assessment or employment reference.

If a reporter believes to have been subject to retaliation, the reporter shall raise a concern according to this Policy. Any employee who retaliates against someone who has reported a violation will be subject to disciplinary procedures, including possible dismissal.

To the extent permitted by the applicable requirements, such protection may be extended to the persons supporting the whistleblower in the reporting process in a work-related context (i.e. the so-called "facilitators"), as well as to the reporter's colleagues, family members and relatives.

## 6.7 Corrective and Disciplinary Actions

Once a review or investigation is concluded and if the concern has been confirmed, certain corrective actions to be taken by assigned owners within a designated timeframe may be recommended.

The status of any corrective actions that have been recommended is monitored to ensure completion.

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

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

- a) Coaching;
- b) Verbal Reprimand;
- c) Written Reprimand;
- d) Suspension;
- e) Termination;
- f) Additional legal action (i.e., civil, or criminal prosecution)

Additionally, disciplinary actions may be taken against reporters who have deliberately and knowingly report wrong or misleading information or individuals who, as part of the investigation, have not been honest and truthful or have not properly assisted or collaborated.

## 7. CONSEQUENCES OF A POLICY VIOLATION

As a Prysmian Employee, you are agreeing to uphold our commitment to ethical conduct and integrity and to abide by our Code of Ethics. Prysmian Employees who violate this commitment or do not comply with this Policy shall be subject to disciplinary procedures, including possible dismissal, and any other legal action required to protect the interest and reputation of Prysmian.

The Company reserves the right, at its sole discretion, to disclose information about violations of law by Prysmian employees to relevant regulatory agencies.

## 8. REPORTING A POLICY VIOLATION

As a Prysmian Employee, you are required to report any violation of this Policy to:

- a) the [IF Helpline](#), or
- b) your Regional Compliance Team or the other designated subjects mentioned in this Policy.

## 9. AUDIT, MONITORING AND CONTINUOUS IMPROVEMENT

As defined by the ISO:37002 Audit, this Policy, the Whistleblowing Management System, and its processes will be audited by Internal Audit at least every 3 years, based on Internal Audit Function's own Risk Assessment.

Additionally, Group Compliance regularly monitors the Whistleblowing Management System in conjunction with the Helpline Committee, identifying any potential deviation of the Policy and/or improvement opportunities.

The system and processes can be adapted at any time according to the results of these audits and monitoring activities, to better suit the needs of Prysmian.

## 10. RELATED DOCUMENTS

The following Documents are related to this Policy and must be consulted by all Prysmian Employees for further guidance. Part of such documents are available on the Prysmian Ethics & Integrity Homepage of our [Company's Intranet](#) and are also publicly available within the correspondent section of our [Corporate website](#).

- a) Code of Ethics;
- b) Anti-Corruption Policy;
- c) Antitrust Policy;
- d) Export Controls Policy;
- e) Gifts and Entertainment Procedure;
- f) Third Party Procedure;
- g) Conflicts of Interest Procedure;
- h) Helpline Procedure.

## APPENDIX A – DEFINITIONS

**Case Manager:** Any person designated by VP Group Compliance to coordinate, supervise and conduct the review or investigation of a particular question or concern.

**Concern:** Any concern about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian, including but not limited to the Prysmian *Code of Ethics*.

**Control & Risks Committee:** The Control & Risks Committee of the Prysmian Group Board of Director's purpose is to assist in Board oversight of the integrity of the Company's financial statements, the Company's compliance with legal and regulatory requirements, the independent auditor's qualifications and independence, and the performance of the Company's internal audit function and independent auditors.

**Corrective Action:** An action that addresses, responds to or mitigates issues identified during a review of a question or concern. Examples may include revision of policies and procedures and disciplinary action.

**Disciplinary Action:** An action identified during a review that addresses the actions of a violation of the Prysmian *Code of Ethics* and/or applicable laws and regulations, the purpose of which is to correct and/or prevent behaviors that are detrimental to Prysmian.

**Employee:** Individual with an employment contract with any Legal Entity of Prysmian. The definition includes any contracted temporary resources.

**Prysmian Ethics & Integrity Homepage:** The Ethics & Integrity Homepage is the Compliance homepage, available in the Company intranet at <https://people.prysmian.com/thematic-area/ethics-integrity> . This site serves as a one-stop shop for all Compliance Policies, communications, training materials, and the Prysmian Helpline. It is accessible by all employees.

**Group Compliance:** Prysmian Group Organization responsible for overseeing and managing all compliance issues within the organization. This office develops programs to safeguard the Company by ensuring all Prysmian Group Employees comply with regulatory requirements and internal policies, and procedures. This Organization will provide guidance, training, advice, and support on all compliance topics and is a resource for all Prysmian Employees.

The Group Compliance Organization contact information may be found at the Prysmian Ethics & Integrity Homepage of our [Company's Intranet](#).

**Helpline Committee:** is a cross-functional internal body composed by the Chief Risk & Compliance Officer, the VP Group Compliance, the Chief Internal Audit Officer, the Chief Human Resources Officer, the Head of Legal Affairs and the Head of Industrial Relations and Employment Governance.

**Incident Report:** The report includes the information provided by the reporter. The report is produced by the Prysmian Helpline Service Provider.

**Investigation Report:** The investigation report includes the description and the results of the investigation performed by the Case Manager regarding an incident report.

**Local Helpline Contact Point:** External consultant that, within the countries listed in Appendix D, has been authorized to operate a reporting channel and therefore to receive reports of potential breaches (either verbally, in writing or personally via a face-to-face meeting), offering appropriate guarantees of independence, confidentiality, data protection and secrecy and ensures the absence of language barriers.

**Prysmian Helpline Service Provider:** External service provider independent from Prysmian which receives the complaint through the Prysmian Integrity First Helpline. The Prysmian Helpline Service Provider produces the Incident Reports and maintains the Prysmian Integrity First Helpline.

**Prysmian Integrity First Helpline:** Secured information system solution provided by the Prysmian Helpline Service Provider for the management and storage of the Incident Reports.

**Quarterly Helpline Report:** Report which includes a summary of the Incident reports received in the last quarter and the Investigation Reports proposed for dismissal by the Helpline Committee to the relevant Control Bodies, such as the Control and Risks Committee.

**Question:** Any question about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian, including but not limited to the Prysmian *Code of Ethics*.

**Reporter:** Employee or other authorized subject who reports to the Prysmian Integrity First Helpline or any other available channel any concern or question.

**Retaliation:** Occurs when an employer takes punitive actions that negatively impact an employee for acting lawfully and according to Company policies and procedures. Retaliation can include any form of negative action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment.

**Review:** The analysis and investigation of the factual, legal and ethical basis of a question or concern, which may include interviews, review of documents and data, site visits and seeking external legal or other advice, as needed.

**Significant Investigation:** is an investigation regarding a concern about a potential, suspected, or known violation that has occurred or may occur, in respect of any applicable law, regulation, or policy or procedure in place across Prysmian, including but not limited to the Prysmian *Code of Ethics* involving the Group CEO and/or any first report of the latter.

## APPENDIX B – QUESTIONS & ANSWERS

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

**Answer:** You should talk to your supervisor and follow up with the Health and Safety Function which oversees the plant you visited. Any potential environmental impact is important and is a threat to our reputation. The issue, where confirmed, should therefore be promptly resolved by the responsible Functions. This may be also a good example of what to do if you raise a concern and do not receive a satisfactory answer. Do not give up, raise it to the next level and you can always talk to your Regional Compliance Team, or raise a concern through the available channels.

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

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

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

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

## APPENDIX C – PRYSMIAN INTEGRITY FIRST HELPLINE PHONE NUMBERS

### International dialing instructions:

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

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

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

### World Wide Connect (WWC):

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

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

Country	Dialing Type	Country Access Codes	Restrictions	NAVEX Hotline Number
Angola	Web only			
Argentina	International Toll Free Service		J	0800-444-1517
Australia	International Toll Free Service		M	1-800-48-2597
Austria	WWC 2 step dialling process	0-800-200-288	27, E	At the English prompt dial 855-214-1483.
Belgium	WWC 2 step dialling process	0-800-100-10	27, a	At the English prompt dial 855-214-1483.
Brazil	WWC 2 step dialling process	Brazil (Cellular) 0-800-888-8288 Brazil 0-800-890-0288	27, 4	At the English prompt dial 855-214-1483
Canada	Direct Dial			855-214-1483
Chile	WWC 2 step dialling process	Chile (Claro) 800-225-288 AT&T Chile (Telefonica) 800-800-288 Chile (ENTEL) 800-360-311 Chile (ENTEL) 800-360-312 Chile (Easter Island via ENTEL) 800-360-311 AT&T Chile (Easter Island) 800-800-312		At the English prompt dial 855-214-1483.
China	Global Inbound Services (GIS)			400-8-811-484
Colombia	WWC 2 step dialling process	Colombia 01-800-911-0010 Colombia 01-800-911-0011		At the English prompt dial 855-214-1483.
Costa Rica	WWC 2 step dialling process	Costa Rica 0-800-011-4114 Costa Rica 0-800-225-5288 Costa Rica 0-800-228-8288		At the English prompt dial 855-214-1483.
Czechia	International Toll-Free Service (ITFS)		J, P	800-143-159
Denmark	WWC 2 step dialling process	800-100-10	27	At the English prompt dial 855-214-1483.
Ecuador	WWC 2 step dialling process	Ecuador 1-800-225-528 Ecuador 1-999-119		At the English prompt dial 855-214-1483.
Estonia	WWC 2 step dialling process	800-12001	4	At the English prompt dial 855-214-1483.
Finland	International Toll-Free Service (ITFS)		GMH	0800-9-17732
France	International Toll-Free Service (ITFS)		M	0800-90-4567
Germany	WWC 2 step dialling process	0-800-225-5288	27	At the English prompt dial 855-214-1483.

Honduras	WWC 2 step dialling process	800-0123		At the English prompt dial 855-214-1483.
Hong Kong	International Toll-Free Service (ITFS)		M	800-96-1023
Hungary	International Toll-Free Service (ITFS)		A, M	06-800-21-119
India	WWC 2 step dialling process	000-117	13	At the English prompt dial 855-214-1483.
Indonesia	International Toll-Free Service (ITFS)		F, L, 11	001-803-1-003-2517
Italy	International Toll-Free Service (ITFS)		A, M	800-782078
Latvia	Web only			
Lithuania	Web only			
Malaysia	International Toll-Free Service (ITFS)			1-800-81-7955
Mexico	International Toll-Free Service (ITFS)		S, U, 11	001-855-214-1483
Netherlands	WWC 2 step dialling process	0800-022-9111	A, M	At the English prompt dial 855-214-1483.
New Zealand	Global Inbound Services (GIS)			0508-612-637
Norway	International Toll-Free Service (ITFS)		M	800-13180
Oman	OneConnect			80050058
Peru	WWC 2 step dialling process	Peru (Telephonica) 0-800-50-000 Peru (Telephonica) 0-800-50-288		At the English prompt dial 855-214-1483.
Philippines	WWC 2 step dialling process	Philippines (the) (PLDT - Tagalog Operator) 1010-5511-00 Philippines (the) (Globe, Philcom, Digitel, Smart) 105-11	04, A	At the English prompt dial 855-214-1483.
Portugal	WWC 2 step dialling process	800-800-128		At the English prompt dial 855-214-1483.
Qatar	Global Inbound Services (GIS)			800-0187
Romania	WWC 2 step dialling process	0808-03-4288	04, 31, A	At the English prompt dial 855-214-1483.
Russian Federation		Russian Federation (the) (St. Petersburg) 363-2400 Russian Federation (the) (Moscow) 363-2400 Russian Federation (the) 810-	A, 22, D	At the English prompt dial 855-214-1483.

		800-110-1011 ^ Indicates second dial tone Russian Federation (the) (Outside Moscow) 8^495-363-2400 ^ Indicates second dial tone Russian Federation (the) (Outside St. Petersburg) 8^812-363-2400 ^ Indicates second dial tone		
Singapore	International Toll-Free Service (ITFS)		M, P	800-110-2171
Slovakia	WWC 2 step dialling process	0-800-000-101	27, D	At the English prompt dial 855-214-1483.
Spain	WWC 2 step dialling process	900-99-0011	27	At the English prompt dial 855-214-1483.
Sweden	WWC 2 step dialling process	020-799-111		At the English prompt dial 855-214-1483.
Switzerland	Web only			
Thailand	International Toll-Free Service (ITFS)		03, P, 11, M	001-800-11-003-2517
Tunisia	Reverse Charge Calls / Collect Calls		M	503-495-9828
Turkey	WWC 2 step dialling process	0811-288-0001	04, 12, A	At the English prompt dial 855-214-1483.
United Arab Emirates	WWC 2 step dialling process	United Arab Emirates (the) 8000-021 United Arab Emirates (the) (du) 8000-555-66 United Arab Emirates (the) (Military-USO and cellular) 8000-061	27, A	At the English prompt dial 855-214-1483.
United Kingdom	International Toll-Free Service (ITFS)		F, M	0808-234-7287
United States	Direct Dial			855-214-1483
Vietnam	WWC 2 step dialling process	Viet Nam 1-201-0288 Viet Nam 1-228-0288	29, 32	At the English prompt dial 855-214-1483.

### Restrictions\*

Service Type	Code	Description
ATTD	4	Not available from cellular phones
ATTD	12	Requires international access
ATTD	13	Only available from phones allowing international access and most public calling centers; may not be available from all locations; not available from public phones.
ATTD	17	Collect calling from public phones
ATTD	22	Add'l charges apply when calling outside Moscow, St. Petersburg
ATTD	27	Available from cellular phones
ATTD	29	VNPT phones (mobile and landlines including Vinaphone and Mobiphone)
ATTD	31	Available only from named carrier
ATTD	32	Vietel phone (mobile and landlines including Vietel Mobile)
ATTD	A	Public phones require coin or card deposit
ATTD	D	May not be available from every phone/public phone
ATTD	E	Public phones may require local coin payment during call duration
GIS International	ITF22	Only available on an individual case basis.
GIS International	ITF25	Qatar has a monthly rental charge of \$50 charge per number.
ITFS	3	Not available from public phones or all areas
ITFS	11	Phone must have international access
ITFS	A	Public phones require coin or card deposit
ITFS	E	Public phones require local coin payment through call duration
ITFS	F	Not available from payphones
ITFS	G	Available from payphones for ITFS but not for UIFN
ITFS	H	UIFN callers using mobile phones charged local charges
ITFS	J	Available from mobile phones for ITFS but not for UIFN. Airtime charges may apply.
ITFS	L	Limited availability from mobile phones. Airtime charges may apply.
ITFS	M	Available from mobile phones. Airtime charges may apply.
ITFS	P	Telephone Administration may restrict the use of toll-free numbers for certain applications such as resale, prepaid cards, calling cards, call-back purposes or third-country calling.
ITFS	S	A general per call surcharge may be assessed to the caller
ITFS	U	May work from non-Carrier phones. Non-Carriers may treat calls as international long distance calls and not toll-free.

## APPENDIX D – EU COMPETENT AUTHORITIES AND LOCAL HELPLINE CONTACT POINTS

N.	Country	Competent Authority	Local Helpline Contact Point
1	Austria	Federal Bureau of Anti-Corruption (BAK)	N/A
2	Belgium	Federal Ombudsmen	N/A
3	Bulgaria	Commission for Personal Data Protection	N/A
4	Croatia	The Ombudswoman	N/A
5	Cyprus		N/A
6	Czech Republic	Ministry of Justice	<a href="mailto:Helpline.Czechrepublich@prysmian.com">Helpline.Czechrepublich@prysmian.com</a>
7	Denmark	Datatilsynet	N/A
8	Estonia		N/A
9	Finland	Office of the Chancellor of Justice	<a href="mailto:Helpline.Finland@prysmian.com">Helpline.Finland@prysmian.com</a>
10	France	<ol style="list-style-type: none"> <li>1) Agence française anticorruption (AFA);</li> <li>2) Direction Générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF);</li> <li>3) Autorité de la concurrence;</li> <li>4) Autorité des marchés financiers (AMF);</li> <li>5) Commission nationale de l'informatique et des libertés (CNIL) for data protection and IT issues;</li> <li>6) Human Rights Defender;</li> <li>7) The judicial authority;</li> <li>8) An institution, body or agency of the EU competent to collect information on violations falling within the scope of the Whistleblowing Directive</li> </ol>	<a href="mailto:Helpline.France@prysmian.com">Helpline.France@prysmian.com</a>
11	Germany	<ol style="list-style-type: none"> <li>1) Federal Office of Justice;</li> <li>2) Federal Financial Supervisory Authority;</li> <li>3) Federal Cartel Office</li> </ol>	Helpline.Germany@prysmian.com
12	Greece	The National Transparency Authority	N/A
13	Hungary	<ol style="list-style-type: none"> <li>1) Competent department of the relevant county government office;</li> <li>2) The Hungarian National Bank;</li> <li>3) The Hungarian Competition Authority;</li> <li>4) The Commissioner for Fundamental Rights</li> </ol>	<a href="mailto:Helpline.Hungary@prysmian.com">Helpline.Hungary@prysmian.com</a>

14	Ireland	The Office of the Protected Disclosures Commissioner (OPDC).	N/A
15	Italy	Aurorità Nazionale Anticorruzione (ANAC)	<a href="mailto:Helpline.Italy@prysmian.com">Helpline.Italy@prysmian.com</a>
16	Latvia	State Chancellery	N/A
17	Lithuania	The Public Prosecutor's Office	N/A
18	Luxembourg		N/A
19	Malta	Several authorities. For a full list, see the table in the First Schedule of the Act.	N/A
20	Poland		N/A
21	Portugal	<ol style="list-style-type: none"> <li>1) The National Anti-Corruption Mechanism;</li> <li>2) Public Prosecutor's Office;</li> <li>3) Criminal Police Bodies;</li> <li>4) Bank of Portugal;</li> <li>5) Other authorities or institutions</li> </ol>	<a href="mailto:Helpline.Portugal@prysmian.com">Helpline.Portugal@prysmian.com</a>
22	Romania	<ol style="list-style-type: none"> <li>1) Financial Supervisory Authority (ASF);</li> <li>2) National Bank of Romania (BNR);</li> <li>3) Other authorities or institutions</li> </ol>	<a href="mailto:Helpline.Romania@prysmian.com">Helpline.Romania@prysmian.com</a>
23	Slovakia	Whistleblower Protection Office	<a href="mailto:Helpline.Slovakia@prysmian.com">Helpline.Slovakia@prysmian.com</a>
24	Slovenia		N/A
25	Spain	Autoridad Independiente de protección del Informante (AIPI)	<a href="mailto:Helpline.Spain@prysmian.com">Helpline.Spain@prysmian.com</a>
26	Sweden	Swedish Work Environment Authority	N/A
27	The Netherlands	<ol style="list-style-type: none"> <li>1) Consumer and Market Authority;</li> <li>2) Financial Markets Authority;</li> <li>3) Dutch Data Protection Authority;</li> <li>4) De Nederlandsche Bank N.V.;</li> <li>5) The House for Whistleblowers;</li> <li>6) The Health and Youth Care Inspectorate;</li> <li>7) The Dutch Healthcare Authority;</li> <li>8) The Authority for Nuclear Safety and Radiation Protection;</li> <li>9) Other authorities or institutions</li> </ol>	<a href="mailto:Helpline.Netherlands@prysmian.com">Helpline.Netherlands@prysmian.com</a>

**APPENDIX E – SUPERVISORY BODIES PURSUANT TO DECREE 231 AND CONTACT DETAILS**

N.	Company	E-mail address
1	Prysmian S.p.A.	odv.prysmian@prysmian.com
2	Prysmian Treasury S.r.l.	odv.treasury@prysmian.com
3	Prysmian Powerlink S.r.l.	odv.powerlink@prysmian.com
4	Fibre Ottiche Sud S.r.l.	odv.fos@prysmian.com
5	Prysmian Cavi e Sistemi Italia S.r.l.	odv.prysmianitalia@prysmian.com
6	Prysmian Cavi e Sistemi S.r.l.	odv.cavisistemi@prysmian.com
7	Electronic and Optical Sensing Solutions S.r.l.	odv.electronics@prysmian.com