

**PRYSMIAN AUSTRALIA PTY LTD**

**MODERN SLAVERY STATEMENT**

*Prepared in accordance with the Modern Slavery Act 2018 (Cth) (“Act”)*

**Our Commitment**

Prysmian Australia Pty Ltd (“**Prysmian Australia**”) is committed to respect the international human rights standards, consider the rights of all persons and address modern slavery in any form. We are committed towards sustainable development by, inter alia, embracing and protecting the human rights of its employees and those affected by its business activities.

We emphasise that safeguarding the dignity, freedom and equality of all human beings is at the heart of who we are as a company.

We reject discrimination of any kind and all illegal acts and activities, including corruption and forced or child labour.

Prysmian Australia operates within the general reference framework of the United Nations Universal Declaration of Human Rights and of the Fundamental Conventions of the International Labour Organisation (ILO) and seek to uphold their recommendations across all our locations.

This universal responsibility for business enterprises is defined by the “Protect, Respect and Remedy” framework, welcomed by the United Nations Human Rights Council in 2008.

**Mandatory Criteria 1 & 2 – Reporting entity, structure, operations and supply chain**

In accordance with section 13 of the Act, this Statement reflects work undertaken by the reporting entity, Prysmian Australia Pty Ltd (ABN 36 096 594 080), to address modern slavery risks in its operations and supply chain during the 2021-2022 Australian financial year.

The Head Office of Prysmian Australia is located at:

**1 Heathcote Road  
Liverpool NSW 2170**

**Structure**

Prysmian Australia is an Australian proprietary limited company and is a wholly-owned subsidiary of Prysmian S.p.A., a public company listed on the Milan Stock Exchange. In this document, the phrase “**Prysmian Group**” shall be taken to refer to Prysmian S.p.A. and all its subsidiaries, including Prysmian Australia.

Prysmian S.p.A. has a free float equivalent to 100% of capital, of which around 78% is held by institutional investors. At the end of 2020, significant shareholdings (in excess of 3%) accounted for approximately 26% of total share capital, meaning there were no majority or controlling interests. Prysmian Group therefore strives to comply with the highest international standards of governance and requires our board of directors to develop a dialogue with shareholders and other stakeholders that generates transparency, meritocracy and ethical behaviour, and these values cascade throughout the organisation into our everyday performance.

SHARE OWNERSHIP BY SHAREHOLDERS  
Source Nasdaq, December 2021



- 81.6% Institutional Investors
- 8.3% Retail
- 1.8% Treasury shares
- 3.0% Employees + Management
- 5.3% Other

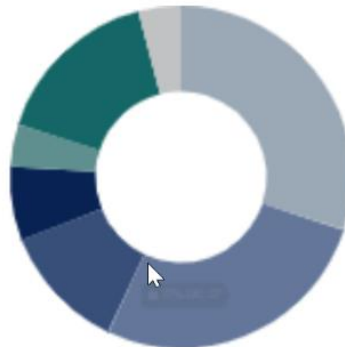
SHARE OWNERSHIP BY TYPE  
Source Nasdaq, December 2021



- 7.4% BlackRock, Inc.
- 4.1% T. Rowe Price Group, Inc.
- 4.5% Crédit Agricole S.A.
- 3.2% Sun Life Financial, Inc.
- 3.7% AXA S.A.
- 2.2% Schroders PLC
- 2.9% The Vanguard Group, Inc.
- 2.7% Hardman Johnston Global Advisors LLC
- 64.6% Other
- 4.7% UBS AG

Many companies shares held by non-institutional investors and by third-party holders of shares for trading purposes

INSTITUTIONAL INVESTORS BY GEOGRAPHICAL AREA  
Source Nasdaq, December 2021



- 30% US
- 27% UK
- 12% France
- 7% Italy
- 4% Sweden
- 16% RoE
- 4% RoW

SHARE OWNERSHIP	SIGNIFICANT SHAREHOLDERS	INSTITUTIONAL INVESTORS BY GEOGRAPHICAL AREA
81.6% Institutional Investors	7.4% BlackRock, Inc.	30% US
8.3% Retail	4.7% UBS AG	27% UK
1.8% Treasury shares	4.1% T. Rowe Price Group, Inc.	12% France
3.0% Employees + Management	4.5% Crédit Agricole S.A.	7% Italy
5.3% Other	3.2% Sun Life Financial, Inc.	4% Sweden
	3.7% AXA S.A.	16% RoE
	2.2% Schroders PLC	4% RoW
	2.9% The Vanguard Group, Inc.	
	2.7% Hardman Johnston Global Advisors LLC	
	64.6% Other	

## Operations

Prysmian Group manufactures underground and submarine cables and systems for power transmission and distribution, as well as medium and low voltage cables for the construction and infrastructure sectors.

We also produce a comprehensive range of optical fibres, copper cables and connectivity systems for voice, video and data transmission for the telecommunications sector.

Prysmian Group has a multi-brand architecture made of three levels:

- Prysmian Group is a strong corporate brand which stands for the whole organisation. It is the umbrella brand under which all the initiatives regarding the Group worldwide are carried out.
- The second level is represented by the three well-known Commercial Brands: Prysmian, Draka and General Cable.
- The third level encompasses the wide range of product brands that serve all the markets and applications in which the Group operates.

## Global Presence

Prysmian Group is a world leader in the energy and telecom cables and systems industry and employs more than 29,000 employees across 50 countries.

### Regional Focus



North America	LATAM	Europe	MEAT	APAC
CANADA	ARGENTINA	CZECH REPUBLIC	ANGOLA	AUSTRALIA
U.S.A	BRAZIL	ESTONIA	IVORY COAST	CHINA
	CHILE	FINLAND	OMAN	INDIA
	COLOMBIA	FRANCE	TUNISIA	MALAYSIA
	COSTA RICA	GERMANY	TURKEY	INDONESIA
	ECUADOR	HUNGARY		NEW ZEALAND
	MEXICO	ITALY		PHILIPPINES
		NORWAY		THAILAND
		PORTUGAL		
		ROMANIA		
		RUSSIA		
		SLOVAKIA		
		SPAIN		
		SWEDEN		
		THE NETHERLANDS		

In Australia, Prysmian Group operates two large production sites in New South Wales (located in Dee Why and Liverpool) which manufacture telecommunications and energy cables.

Additionally, there are nine warehouses operating within Australia.

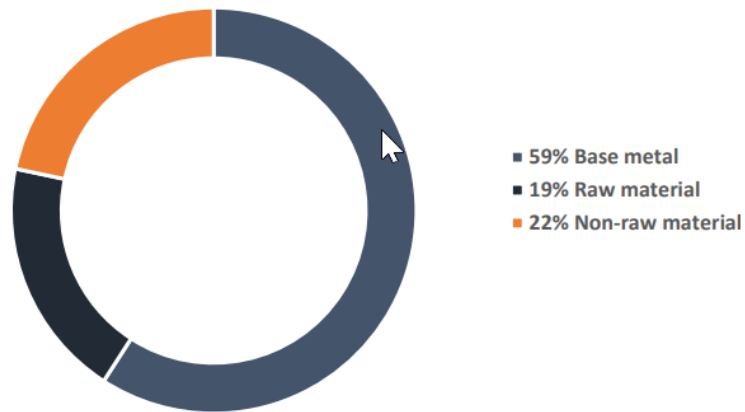
### Supply chain

Prysmian Group primarily purchases three commodities: Base Metals, Raw Materials and Non-Raw Materials:

- Base Metals
  - aluminum, copper and lead;
- Raw Materials
  - For cables (aimed at insulation and protection of the conductor) such as Polyethylene and PVC compounds, rubbers, special plastics, yarns, tapes, galvanized steel wires;
  - For optical fiber making such as coatings, glass tubes, high purity quartz sand and silicon donors' products;
  - Components for energy and telecommunications accessories such as connectors, metal parts composite insulators, casings, connecting boxes;
  - Raw materials and components for elevators;
  - Materials and components for electronics and optical sensing solutions;
- Non-Raw Materials
  - All services and goods which are not directly connected to our final products, such as installation services, transportations, packaging, MRO (Maintenance, Repair and Operations) and utilities.

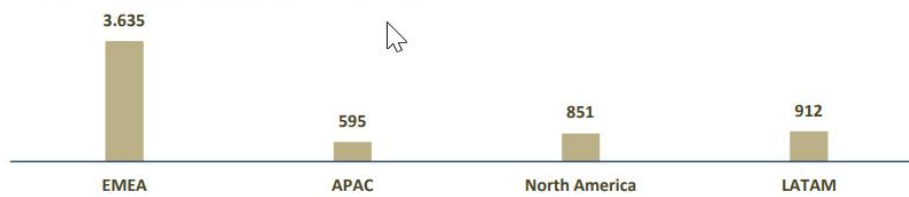
Typical Group annual purchased value (APV) by commodity (9 – 11 Bn€ total):

**% OF SPEND ON SUPPLIERS 2021 - PRYSMIAN GROUP**



**TOTAL NUMBER OF SUPPLIERS BROKEN DOWN BY GEOGRAPHICAL AREA IN 2021**

**NO. OF SUPPLIERS 2021- PRYSMIAN GROUP**



**% OF SUPPLIERS 2021- PRYSMIAN GROUP**



In 2021, out of 5,993 suppliers of base metals and raw materials, 60.70% were located in the EMEA area. The remainder were split almost equally among the other geographical areas.

### **Mandatory Criterion 3 - Risks**

Prysmian Group understands that combating modern slavery is a significant issue within operations and supply chain globally and is not limited in entirety to a specific location or industry. Prysmian Australia continues to be committed to complying with the Commonwealth Government legislation to increase transparency and combat this confronting problem.

As a global operation supported by a considerable supply chain, we are aware the potential that modern slavery could be linked to our business directly, indirectly or through association. Prysmian Group acknowledges that, although it is more likely modern slavery practices may occur in geographic locations with a lesser reputation for supporting human rights, it is our responsibility to continue to communicate and reinforce to our employees and supply partners to operate ethically.

#### Operational Risk

As a business that operates both domestically and internationally, our employees are based all over the world. A proportion of our operations are conducted within Australia. From a geographical perspective, given the controls, legislation and societal expectations in Australia, this lessens the risk to our workforce based in Australia from being subjected to modern slavery labour practices.

However, our international presence and operations based in Asia and Africa and South America fall in the higher geographical country risk category as these locations are more likely to be considered as high-risk geographies with vulnerable populations.

Given the risks associated with modern slavery occurring within the operational aspects of our business, Prysmian Group continues to progressively communicate to all employees, contractors and those affiliated with our organisation our expectations and their obligations, where possible. We continue to monitor our businesses to ensure all operations are undertaken in safe environments and our workforce is treated fairly under the relevant legislation and/or enterprise agreements.

#### Supply Chain Risk

Our business collaborates with a diverse number of suppliers who contribute to our extensive supply chain. Prysmian Australia considers the potential risk of modern slavery practices occurring within our supply chain to be materially more possible than directly within our operations.

During the reporting period, we conducted due diligence and evaluation on suppliers and especially on areas of our supply chain that may be more susceptible or have greater exposure to the risk of modern slavery being present, to ensure goods and services supplied to Prysmian Australia are done so ethically and risks of modern slavery are managed appropriately.

It is Prysmian Australia's view that our direct suppliers, especially those whom we have active contractual relationships with, present a lesser risk in terms of engaging in modern slavery behaviour in comparison to that of our indirect suppliers. This is due to those suppliers being engaged with Prysmian group through more robust and diligent processes, such as tender processes, contractual conditions, contract management overview and reporting mechanisms.

Prysmian Australia continues to engage with our supply chain to review our suppliers (specifically those considered 'higher risk') to reaffirm their commitment to and compliance with the Act.

#### **Mandatory Criterion 4 – Actions**

Prysmian Australia is committed to continually enhancing our processes to identify, assess and address potential modern slavery risks within our businesses at both a corporate and local level, where possible. We understand that the abolishment of modern slavery activity is an ongoing commitment. We intend to refine our governance arrangements, policies and procedures, and supply chain documentation to improve our position as an organisation that opposes modern slavery in all its forms.

#### Company Policies and Standards

Prysmian Australia implements Group policies and procedures which help to implement our commitment to ethics, wellbeing, safety, and demonstrate the protections afforded to our team members. Prysmian Australia expects its customers, partners, suppliers and service providers to comply, at a minimum, with all applicable local laws and regulations related to labour and employment, including but not limited to minimum wage, maximum hours of work, days of rest, compensation, freedom of association, right to organize and collective bargaining.

All employees of all Prysmian Group entities and their suppliers, trade partners, commercial agents, subcontractors and distributors are required to acknowledge and implement our commercial **Code of Business Conduct**, which references standards and principles in relation to business integrity, human and labour rights and the environment.

Our **Human Rights Policy** applies to all our physical and legal boundaries in terms of business activities and operations carried out by the workers of Prysmian S.p.A. and its subsidiaries, including Prysmian Australia. Prysmian Group also encourages all its suppliers and independent contractors to adopt this Policy. Prysmian Group is committed to progressively assessing its suppliers' respect of the principles reported in this Policy, through a structured process supported by audits with the aim of monitoring the supply base in order to prevent any violation and, if necessary, take actions in order to identify any denial of human rights. As expressed in our Code of Business Conduct, if any violation of these principles occurs, Prysmian Group reserves the possibility to reconsider the future of the commercial partnership with the involved business partners.

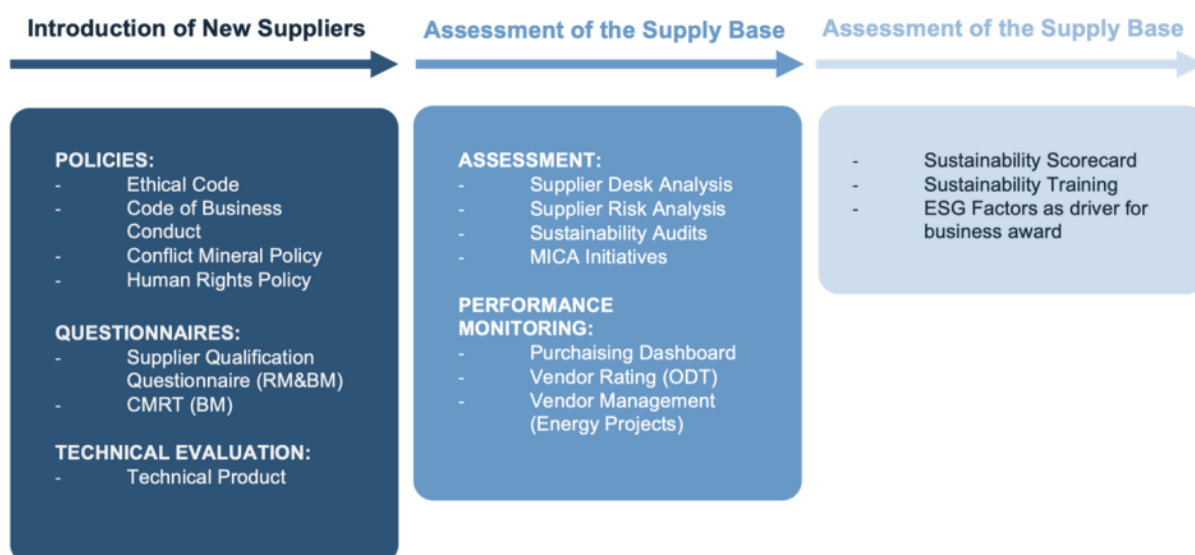
The below principles listed in the Human Rights Policy concern the fundamental human rights in the ILO's Declaration on Fundamental Principles and Rights at Work:

- Non-discrimination
- No child labour
- No forced, bonded and compulsory labour
- Freedom of association and recognition of the right to collective bargaining
- Health and safety
- Working conditions
- Fair wages and equal compensation

Supply Chain Strategy

The **Supply Chain Strategy** has been introduced for the first time in 2018 with the purpose of explaining how the Procurement Department in Prysmian Group approaches and implements ESG (Environmental, Social and Governance) factors in its processes. During the last few years, the Procurement Function focused its attention on streamlining the activities and processes related to Sustainability with the aim of maximizing the effectiveness.

ESG factors have been considered as a fundamental part of each point and integrated within the existing strategy and activities rather than developing dedicated stream of sustainability in parallel to a more traditional supply chain. Prysmian Group Purchasing identifies 3 main steps in the supply base management: Introduction of new suppliers, Assessment of the actual supply base and Continuous improvement. The scheme here below shows how ESG factors are embedded within each of the three steps.





## Links to documents mentioned in this section:

- **Ethical Code:**  
[https://www.prysmiangroup.com/sites/default/files/atoms/files/Code%20of%20Ethics\\_final\\_EN.pdf](https://www.prysmiangroup.com/sites/default/files/atoms/files/Code%20of%20Ethics_final_EN.pdf)
- **Code of Business Conduct:**  
[https://www.prysmiangroup.com/sites/default/files/atoms/files/Prysmian\\_Code%20of%20Business%20Conduct\\_Final\\_070519.pdf](https://www.prysmiangroup.com/sites/default/files/atoms/files/Prysmian_Code%20of%20Business%20Conduct_Final_070519.pdf)
- **Supply Chain Strategy and Vendor Management:**  
<2022-PrysmianGroup-Purchasing-SupplyChainStrategy-public.pdf>
- **Human Rights Policy:**  
[https://www.prysmiangroup.com/sites/default/files/atoms/files/prysmian\\_group\\_human\\_rights\\_policy\\_eng\\_firma-vb.pdf](https://www.prysmiangroup.com/sites/default/files/atoms/files/prysmian_group_human_rights_policy_eng_firma-vb.pdf)

## Whistleblowing Policy

In order to avoid any violation of the Policy, employees are provided access to an independent grievance mechanism under our Whistleblowing Policy, which enables serious concerns on violations of the Code of Ethics and other Group policies and their principles.

## **Mandatory Criterion 5 - Effectiveness**

Prysmian Group periodically reviews and modifies our policies in order to ensure continued adequacy and effective implementation.

We have a Compliance department monitoring the implementation and respect of our Code of Ethics and other relevant policies. The structure of the department includes the following roles:

- Chief Compliance Officer: reports to the Control and Risks Committee and the Chief Executive Officer of Prysmian Group. He/she is responsible for managing all compliance policies and procedures, including the Code of Ethics.
- Local Compliance Officers: present in each company of the Group, including Prysmian Australia, and has the responsibility of implementing all relevant policies.

The responsibilities of the Compliance department with respect to human rights include:

- Conducting, in conjunction with the other relevant functions involved, appropriate human rights assessment activities, within their respective areas of responsibilities;
- Reporting on the implementation and results of assessment activities to the Control and Risk Committee;
- Reporting annually for the Group's Sustainability Report on Prysmian's performance on its commitments.

- Prysmian Group's **Sustainability Report 2021** can be accessed here:  
[https://na.prysmiangroup.com/sites/default/files/atoms/files/Prysmian Group Sustainability Report 2021.pdf](https://na.prysmiangroup.com/sites/default/files/atoms/files/Prysmian%20Group%20Sustainability%20Report%202021.pdf) .

## **Mandatory Criterion 6 - Consultation**

Process of consultation with entities is ongoing.

Prysmian Group has worked with an external agency to assist in its due diligence process when appointing business partners, service providers and suppliers.

## **Mandatory Criterion 7 – Related activities**

### Outlook

Moving ahead, we intend to build on our current progress -

Internally:

- Continue to collaborate and consult with our broader team to educate and mitigate the risks of modern slavery developing within our businesses.
- Further roll out of our learning materials to operational level employees.
- Continually review our 'best practice' approach to ensure appropriate human rights practices are in place to address potential infringements across all business divisions.
- Continue to ensure explicit references to risks and practices to combat modern slavery are built into our policies and procedures.

Externally:

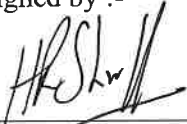
- Continue to engage with our key suppliers to ensure the alignment of values on modern slavery practices.
- Roll out of a comprehensive supplier survey inclusive of human rights commitments to be issued to our top tier suppliers and those considered to be in 'higher-risk' industries.
- Continue to work towards a standard of progressively building in specific terms and conditions regarding anti-modern slavery into our supply contracts.
- Ensure relevant due diligence is undertaken on the purchase of goods and services from geographies considered 'higher-risk' and ensure any Australian agents of products manufactured from those geographies have relevant controls in place. We are currently rolling out a questionnaire to be distributed to our suppliers and subcontractors as part of the due diligence process.
- Maintain a register and good records of all our past and current suppliers and subcontractors.

**Approval**

This Statement is made in accordance with the *Modern Slavery Act 2018* (Cth).

This Statement has been approved on 1<sup>st</sup> June 2022 by the Directors of Prysmian Australia Pty Ltd for itself as the reporting entity for the purposes of the Act and for Prysmian S.p.A. as its ultimate holding company.

Signed by :-



HAMAVAND SHROFF  
Chief Executive Officer