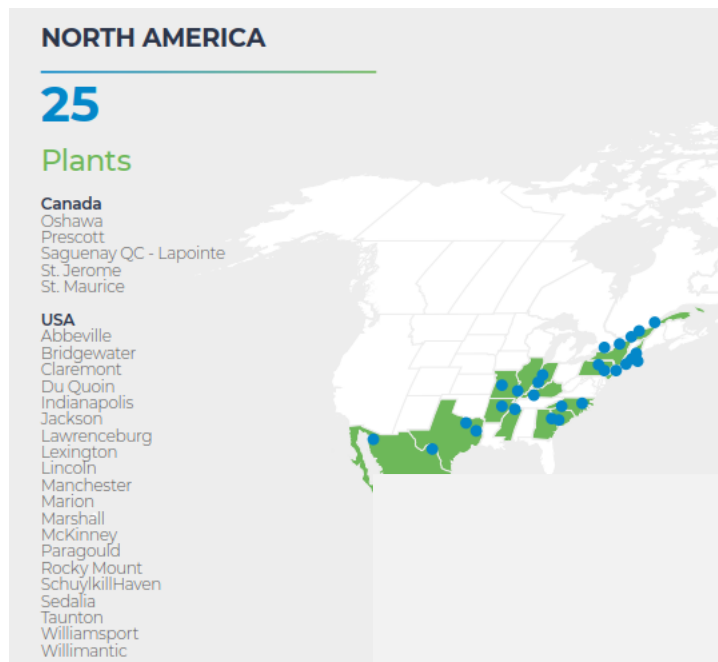


## Canadian Forced Labour Report

### Who We Are

With a direct presence in more than 50 countries around the world, 108 factories, 26 R&D centers and over 30,000 employees, Prysmian is a global leader in cable systems for energy and telecommunications. Prysmian's Headquarters in Milan, Italy, employing around 800 persons, is supported by regional headquarters in **North America**, South America, EMEA (Europa, Middle East and Africa) and APAC. Prysmian was established in 2005 following the acquisition of the Energy Cables and Systems and Telecom Cables and Systems businesses of Pirelli by the Goldman Sachs group.

The **North America** region is comprised of the following production facilities:





There are 5 Canadian production plants and a Canadian Headquarters located near Toronto. This report will be a joint reporting for the following Canadian legal entities:

- Draka Elevator Products, Incorporated
- EHC Canada, Inc.
- EHC Global Inc.
- General Cable Company Ltd.
- Prysmian Cables and Systems Canada, Ltd.

## What We Do

Every day, worldwide, Prysmian contributes to the development of smarter, more sustainable electricity and telecommunications networks to transport clean energy and information faster and farther.

While Prysmian's positioning as a "cable manufacturer" remains at the heart of what it does, the new strategy announced in late 2023 aims to position Prysmian as a "Global provider of cabling solutions, at the helm of the energy transition and the digital transformation; "Connect, to lead." Indeed, the ability to increasingly integrate the various components of engineering, installation, network monitoring and after-sales services into value-added services guarantees recurring revenue and long-term partnerships with customers.

Energy Division specializing in products and services for power distribution and special cables for applications in a wide variety of industries, as well as medium- and low-voltage cables and accessories for the construction and infrastructure sectors:

- Energy & Infrastructure, which includes the Trade & Installers business, with a focus on the industrial and infrastructure segments (cables for power distribution to residential, commercial and industrial facilities and for infrastructure such as airports, ports, railway stations and data centers), and Power Distribution (medium-voltage cable systems for overhead and underground installations, and the related accessories and network components, for connecting industrial and/or residential buildings to the primary distribution network)
- Special Cables for the Industrial & Network Components segments that include a broad range of cables for different industries – from renewables to marine, automotive to aerospace, flat lift cables to network monitoring solutions – with a high level of specificity, including turnkey and maintenance services.

Telecom Prysmian is the world's largest supplier of state-of-the-art cables and accessories for voice, video and data transmission, and offers a full range of fiber optic, optical and copper cables and connectivity systems:



- Telecom solutions: fiber optic and copper telecom cabling solutions and related connectivity accessories. In both cables and connectivity, Prysmian focuses on designing products that provide higher density in smaller diameters, are easy to use and optimize fiber management.
- MMS Multimedia Specials: fiber optic and copper solutions for fixed or mobile multimedia communication, such as audio-visual content transmission, or indoor connectivity – increasingly important for the development of smart buildings and the Internet of Things.
- Fiber optic: Prysmian produces single-mode and multimode optical and special fibers, using an innovative proprietary technique that places the company at the forefront of today's technology.

Projects from underground cable systems supporting the energy transition and powering wind farms, to undersea systems installed by the company's cable-laying vessels, Prysmian works on supply-only and turnkey projects for some of the world's largest operators. Prysmian uses specific technologies for undersea power transmission and distribution and offers sophisticated solutions that satisfy the strictest international standards. It specializes in the manufacture and installation of data transmission cables. The Offshore Specialties business includes a wide range of products for the oil industry. Prysmian has built a unique set of assets to meet market needs: with the ability to deploy connections more than 200 km long, an installation depth of up to 3,000 meters, proven expertise, a turnkey offering combining technology, installation, monitoring, maintenance and repair, and innovative and environmentally sustainable materials, Prysmian is the partner of choice for major global operators.

- Draka Elevator Products, Incorporated – Sales, Marketing or Distribution
- Prysmian Cables and Systems, Ltd. – Manufacturing or Production; Sales, Marketing and Distribution
- General Cable Company, Ltd. – Manufacturing or Production; Sales, Marketing and Distribution
- EHC Canada, Inc. – Research and Development; Holding / managing intellectual property; Manufacturing and Production; Sales, Marketing or Distribution; Administrative, Management or Support Services
- EHC Global, Inc. - Holding Shares or Other Equity Instruments

## **Our Supply Chains**

Being a global leader in manufacturing and having to directly source metals and raw materials entails a number of challenges, including the need to continuously monitor the entire procurement base, ensuring that all of Prysmian's business partners apply ethical conduct in their business processes.

Prysmian can count on a broad, diversified procurement base, with mutually advantageous business relationships. Most of the company's suppliers are established leaders in their markets, applying best practices managing ESG factors. At the same time, Prysmian also works with smaller players that can benefit from working with a customer like Prysmian, willing to support their business continuity and make recommendations on how to improve their sustainability management. Prysmian's supply chain is broken into three segments.

## 1. Base metal

The Base Metal category includes three raw materials: aluminum, copper and lead; the first two account for the majority of raw materials purchased by Prysmian. The essential element of the cable conductor manufacturing process is copper and aluminum wire rod. These metals are purchased from the world's major mining companies, while Prysmian manufactures only modest amounts of wire rod itself (less than 10% for copper and about 25% for aluminum compared to total requirements). Given the highly fragmented copper market, Prysmian represents one of the major economic players in the industry. The company's metal procurement strategy takes into consideration three aspects:

- The importance of suppliers within Prysmian's value chain
- The high consumption of metals
- The widespread geographical distribution of Prysmian's production sites

With specific reference to aluminum sourcing, the choice is increasingly leaning toward vertically integrated suppliers (with processes that produce aluminum wire rod from alumina directly) versus non-integrated producers (producers who purchase aluminum ingots for wire rod production).

This strategy, in addition to having several advantages in terms of both supply security and costs, is also much more environmentally sustainable, thanks to the simplification of logistics flows and the elimination of the ingot remelting cycle. Given the high power consumption required by the metalworking processes, Prysmian has also adopted ecological footprint as a criterion for supplier selection, allocating significant portions of its portfolio to aluminum manufacturers with a reduced environmental impact. Collaborating with leading companies in the copper and aluminum sectors, which are equally concerned with environmental sustainability, thus creates a highly sustainable end-to-end cycle. In addition, Prysmian has been working to make trade more sustainable through increased digitalization and, in the future, it aims to adopt an increasing number of initiatives in collaboration with suppliers.



## 2. Raw materials

While Base Metal is mainly used for energy cable conductors, all other raw materials prove useful for a wider range of products and applications:

- Cable raw materials (used for insulation and conductor protection), such as polyethylene and PVC-based compounds, rubbers, special plastics, yarns, tapes and galvanized steel cables
- Raw materials for optical fibers such as coatings, glass tubes, high-purity quartz sand and silicon-based donor products
- Components for energy and telecommunications accessories such as connectors, composite insulators for metal parts, enclosures and junction boxes
- Raw materials and components for elevators and escalators
- Materials and components for optical and electronic sensing solutions

With a broad range and small volume of raw materials purchased, Prysmian is not a significant partner for most of the suppliers of the raw materials listed above. Typically, Prysmian uses either goods that are widely available from multiple sources or high-performance raw materials that are produced only by a small number of suppliers, often highly specialized multinational companies characterized by strong technological know-how and high specialization in the cable and conductor market.

Prysmian regularly assesses potential financial and operational risks, which may derive from circumstances such as single-source sourcing or supply-demand imbalance. These risks are managed by entering into long-term supply agreements when there is only one supplier or when its replacement would entail considerable difficulty and take a long time. In the event of risks linked to limitations in market supply, Prysmian works with the technical functions to identify alternative suppliers to diversify supply options.

## 3. Non-raw material

The Non-Raw Material category incorporates all the services and goods that are not directly connected to the end products. Excluding installation services, this category specifically includes: transportation, packaging, MRO (maintenance, repair, and operations services) and utilities, which account for more than 50% of total expenditure for the category. Services that fall under these four definitions are handled in very different ways, depending on the level of centralization required:

- **Transportation:** For these services, there is strong support from headquarters in managing global or domestic agreements with international suppliers that provide specific expertise in logistics aspects and billing process management. Relationships with these suppliers are established through long-term partnerships with the following objectives: highest quality and efficiency in logistics flows, high level of service and on-time delivery, cost management and price stability to avoid “spot” market fluctuations. Increasing attention is also paid to the ability of transportation

and logistics suppliers to measure and report CO2 emissions generated “on behalf” of Prysmian.

- Packaging, in turn, broken down into:
  - Reels: They represent the most common packaging method for transporting cables to their final destination, which is generally defined based on national contracts coordinated by headquarters. Prysmian mainly purchases wood and steel reels, with a smaller share of plastic and plywood reels. Steel reels are returnable and, after being repaired, are reintroduced into the cycle, while wooden reels are not always reused. As a result, one of the company's most important goals is to increase the amount of reused wooden reels. Initiatives are also underway to replace some of those purchased already assembled with reel kits, to reduce the space needed to transport them and, consequently, the carbon footprint of transport operations. Regarding plastic reels, the company is considering alternative materials and is trying to increase the use of recycled plastic materials instead of virgin plastic. In 2021, Prysmian partnered with a selected supplier of plastic reels to use its own plastic waste to close the cycle. Starting in 2023
  - , the company launched a program to promote the responsible use of wood used for reels and packaging as much as possible by mapping suppliers with certifications that support the responsible use of the material (PFEC, FSC, Canadian Wood Pallet certification program, Timber Trade Federation). 60% of the company's expenditure on wood products comes from suppliers holding such certifications. The ultimate goal is to increase this share.
  - Other packaging materials: Pallets, wooden planks, endcaps and foam materials used to cover the reel once it is loaded. This part of the expenditure is managed at the local level, with the aim of reducing costs as much as possible and promoting the adoption of more environmentally sustainable solutions.
- MRO (Maintenance, Repair and Operations): This category includes a wide range of materials and services, mainly spare parts (mechanical and electrical) and PPE. These services are mostly handled nationally, while in some cases, facilities may refer to local workshops that offer better service at more competitive prices than the major players. The objective is to maintain PPE management at the national level so that strict controls are in place to ensure that all safety requirements are met. Spare parts management is also largely centralized, while local agreements may be made for repairs to ensure more efficient management.
- Utilities: Among these supplies, the largest share is related to electricity (85%). Each year, Prysmian analyzes utility expenditure in detail, evaluating the possibility of using more environmentally friendly energy sources (e.g., investment in solar panels and farms at selected factories), increasing plant efficiency to reduce energy



consumption (e.g., LED lighting initiatives) and investing in the purchase of GO (Guarantees of Origin) certifications.

The Canadian entities of Prysmian manufacture energy and specialty cables, which would entail sourcing the specific materials below:

- Draka Elevator Products, Incorporated – conduit, cable, and wire rope
- Prysmian Cables and Systems, Ltd. – aluminum and copper
- General Cable Company, Ltd. – aluminum and copper
- EHC Canada, Inc. – SBR rubber and thermoplastic urethane
- EHC Global, Inc. – no materials required as a holding company

## How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labor

### Our Policies

Prysmian's commitment with respect to social and environmental sustainability in its value chain is expressed through various supply chain management policies, which underline the presence of ESG (environmental, social, and governance) factors as a key part of the sourcing strategy.

The main objective is to maximize the effectiveness of sustainability-related activities and processes by ensuring that suppliers comply with the Code of Ethics, Code of Business Conduct, Human Rights Policy and Conflict Minerals Policy.

POLICIES	BRIEF DESCRIPTION
Code of Ethics	<p>Key element of the corporate constitutional charter. Document that contains moral rights and obligations and defines the ethical and social responsibilities of each person within the organization. The Code covers three essential areas:</p> <ul style="list-style-type: none"> <li>• Ethics in business activities</li> <li>• Ethics in internal relations</li> <li>• Ethics in environmental and social issues</li> </ul>
Code of Business Conduct	<p>For more details, refer to Chapter ESRS S1 – Owned Workforce.</p> <p>Document aimed at actively promoting business practices under the banner of supply chain responsibility and sustainability and compliance with ethical, economic, environmental and social standards throughout the company. The Code extends to all employees and business partners. The principles defined in the Code apply to the business transactions and daily activities of all employees, Group companies and their suppliers, business partners, representatives, subcontractors and distributors. The Group's application of the relevant guidelines is communicated to suppliers in the preliminary stages of collaboration.</p>
Human Rights Policy	<p>The document emphasizes the Prysmian Group's commitment to respecting and protecting human rights. The policy is based on three main pillars: engagement, due diligence and remedies. Prysmian is committed to respecting fundamental human rights, assesses the impact of its activities on human rights, and provides access to remedies for any violations.</p> <p>For more details, refer to Chapter ESRS S1 – Owned Workforce.</p>
Policy on Conflict Minerals	<p>Document that suppliers must acknowledge (specification especially for Base Metals suppliers) and requires that all regular Base Metals suppliers, even if they do not directly supply any of the four 3TG minerals to Prysmian, comply with the Conflict Minerals Policy.</p>
Document of Supply Chain Strategy and Vendor Management	<p>This document summarizes the main characteristics of Prysmian's supply chain strategy and the actions taken to integrate ESG factors within it. It sets out in an operational manner all the provisions indicated in the policies described above.</p>

### Code of Business Conduct

For the protection of rights in the value chain, the company has a Code of Business Conduct, written in compliance with the guiding principles of the United Nations (quality education, gender equality and reduction of inequality), and with particular reference to the International Bill of Human Rights and the International Labor Organization Declaration, providing for the protection of workers and their rights, safeguarding the prohibition of child labor and human trafficking, occupational health and safety, non-discrimination, compliance with local minimum wage laws, and freedom of association.

The policy (the Code of Business Conduct) focuses on risk management along multiple dimensions, including ESG performance, and aims to motivate suppliers to mitigate identified risks and adopt sustainable practices. In fact, this policy is shared with suppliers and stakeholders at the time of initial engagement and during subsequent business interactions, also making it available on the company's public website.

The Code applies to suppliers, business partners, business agents, subcontractors and distributors of the Group and employees for the management of relations with the aforementioned parties, and should be implemented in their business operations and day-to-day activities, particularly with regard to deal-making and purchasing processes.

The Group encourages its business partners to share its commitments.

The document is made available to the public on the company website and shared with business partners.

The document was approved by the Group CEO, who together with the CPO and the COO is responsible for its implementation.

### **Our Human Rights Due Diligence**

The double materiality analysis carried out by Prysmian has made it possible to identify potential risks related to non-compliance with human rights and sustainable practices along the entire supply chain, as well as issues related to the health and safety of workers throughout the value chain.



The main actions taken by Prysmian to reduce these potential risks include:

- compromise of the contract award or the introduction of specific clauses to ensure protection against the risk elements identified by Prysmian;
- signing of the code of conduct by the supplier;
- acquisition and maintenance of supplier status by the supplier itself;
- strengthening of the verification activities carried out by the company (increase in the number of audits);
- attention and continuous improvement of the risk identification and mitigation process, with a responsible and transparent approach.

Prysmian conducts an annual Desk & Risk Analysis of its suppliers, including suppliers of metals, raw materials, and for the geographic areas of LATAM, ASEAN, Turkey, China and the Middle East also suppliers of energy, logistics, packaging, and MRO (Maintenance, Repair, Operations), in order to identify key ESG risk exposures in the supply chain. The findings of this assessment guide the Group's strategy with respect to deepening the upstream chain and prioritize subsequent mitigation actions, by conducting sustainability audits targeting suppliers with a score deemed unsatisfactory on the social side, which include aspects related to human rights and labor rights. The on-site audit also evaluates through a scoring scheme aspects related to worker well-being, analyzing production and office areas, canteens and kitchens, infirmaries, etc. The results of the audit are also shared with the supplier, supporting them in pursuing initiatives aimed at concrete improvements. In fact, these audits are followed by tailored plans for improvement and corrective actions for the supplier. Through its annual Desk & Risk Analysis (1) and sustainability audits (2), Prysmian constantly monitors the impacts, risks and opportunities related to its value chain.

Regarding the first point, the most significant suppliers at the level of overall spending for the Group are involved in this analysis through the assignment of both specific scores for the 3 metrics analyzed (social, environmental, business governance) and an overall score that can provide a result to rank supplier risk. Metrics are analyzed annually and compared with previous years' results to monitor trends.

Based on the scores obtained and the intersection with the Group's overall spending level, the most high-risk suppliers are defined and selected for sustainability audits. Another metric used is the number of audits conducted annually (1 audit per individual supplier) and the number of follow-up audits between the parties.

In addition, after two audits found to be unsatisfactory, a supplier is considered to be at risk of being excluded with contract termination if it fails to achieve the minimum ESG requirements by the set deadline. Monitoring of these actions is carried out continuously by periodically updating the analysis underlying the action itself.

### Participation in Copper Mark Initiative

Prysmian in 2024 joined the Copper Mark Initiative, a common framework aimed at promoting best practices across the copper value chain, linking different organizations of miners, producers and consumers. In addition to the environmental dimension, the Copper Mark Initiative particularly promotes the exchange of knowledge and know-how in the



social sphere and in particular the protection of workers' well-being and safety, critical aspects of the mining industry.

The principles behind the Copper Mark Initiative are fully aligned with the Group's approach to sustainability.

Prysmian is a major player in a number of raw material procurements around the world. For copper, this supply is about 2 to 3%. For this reason, the company is committed to constantly improving how it can have a positive impact, and Copper Mark is part of the journey. Joining this initiative also represents support for reducing the carbon footprint, another goal that Prysmian constantly and transparently monitors. Copper Mark also supports Prysmian in achieving goals related to increasing revenues from sustainable products and increasing recycled content used in manufacturing.

Prysmian is committed to working with its suppliers and all stakeholders in its value chain to ensure a responsible and sustainable value chain; stakeholders guide Prysmian's business decisions and help create a better future for the company, the societies in which it operates, and the environment.

Joining the working groups of the Copper Mark Initiative is therefore a valuable means of reinforcing Prysmian's commitment to reducing its negative impact on the environment and emphasizing its role as a leader in the process of energy transition and decarbonization of the world's economies.

Joining the Copper Mark Initiative did not entail any cost for Prysmian, as the company committed to contribute to the achievement of the goals set by the organization.

### Participation in the Responsible Mica Initiative

In order to manufacture certain safety cables and make them fire-resistant, Prysmian contacts producers and distributors to purchase limited quantities of certain types of glass-based tape containing low percentages of mica. This mineral is not used directly in the Group's products and production processes. Mica is mined in geographical areas where several factors contribute to unsustainable working conditions and the use of child labor. Since 2016, Prysmian has been involving suppliers of mica-containing products in activities to raise awareness of working conditions. The Group gives special attention to the analysis of risks present in the supply chain and makes responsible efforts to work with suppliers that share the objectives defined in its Human Rights Policy, requiring appropriate disclosures regarding mica sources and to certify the absence of child labor. Prysmian is also committed to reducing the quantities of mica in its products as much as possible such that the volumes of purchased mica are now in the range of 0.05% of the total raw material requirements for the Group. Prysmian has been addressing this issue since 2016 by requiring all suppliers to provide appropriate information about their mica sources and certify the absence of child labor. In 2021, Prysmian became the first business in the cable industry to join the Responsible Mica Initiative (RMI). Participation in the RMI enables Prysmian to exercise even more effective control over its supply chain.



## Supplier Engagement Program

In 2024, Prysmian initiated a revamp of the Vendor Management portal with the aim of improving vendor evaluation processes to increase the focus on risk management in multiple dimensions, including but not limited to ESG performance. Suppliers included in the program have a direct relationship with Prysmian (tier 1), represent all purchasing commodities (metals, raw materials, services, etc.), and are selected based on specific criteria of strategic importance, such as level of spending and innovation, and criticality of supply. This improvement will positively influence supplier development programs by motivating and guiding Prysmian's third parties to mitigate any identified risks and encourage them to increasingly adopt sustainable practices in their operations. Through this initiative, Prysmian will be able to improve its supplier ESG program through more structured monitoring of the process. Based on the risk rating score (including, but not limited to, the ESG component), a series of pre-defined actions will be implemented to foster continuous improvement, aligned with Prysmian's medium- and long-term ESG goals.

Improved Vendor Management will allow Prysmian to create moments of interaction with its vendors focused on the performance trend achieved in ESG (and beyond) by encouraging that these issues are increasingly addressed and dealt with directly.

## Employee Training on Forced Labour and Child Labour

Prysmian requires suppliers to show rigorous respect for human rights, applying a specific Due Diligence process that assesses the risk at the supply chain level.

Furthermore, 11,168 hours of training were provided in 2023 on the topics of Ethics and Human Rights, with a view to raising and disseminating awareness about them within Prysmian. More information about Prysmian's human rights due diligence process can be found in the Human Rights section of the corporate website.

## How We Monitor Ourselves and Our Suppliers

Prysmian's Human Rights Policy was introduced in 2017. This policy, available on the corporate website, is based on various international standards (such as the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO), the United Nations Global Compact, etc.) and applied at all locations and in all Prysmian activities. In addition, a Human Rights Due Diligence process, available on the corporate website, has been in operation since 2018, enabling Prysmian to map the potential impacts that the company's operations may have on respect for human rights.

Applying our Due Diligence process, the assessment of all production locations that commenced in 2022 was completed in 2023. Following this assessment, nine plants found



to be at high risk of violating human rights were audited to check if there was any substance to this analysis.

For our suppliers, a sustainability audit program was implemented in 2017 with the goal of performing 30 ESG audits by the end of 2022. This goal was achieved and the auditing program has been extended beyond 2022. These audits were performed with support from an external consultant. Suppliers subject to audits are identified based on the score assigned to them downstream of the Risk Analysis. The results of the audits performed are shared with them, with the aim of generating positive change in those that are underperforming. If the results are satisfactory, the supplier is no longer considered high risk. If the audit results are not satisfactory, a follow-up audit is carried out based on an agreed action plan. Prysmian's major suppliers are regularly involved in specific activities, such as workshops and collaboration on developing more sustainable products, to generate a medium/long-term impact on the industry. With regard to base metals, many Prysmian suppliers participate in the most important industry initiatives, such as the Copper Mark and the Aluminum Stewardship Initiative (ASI).

## **We Are Aware of Risks of Forced Labour or Child Labour Use in Global Supply Chains**

Prysmian faces daily complexities arising from the management of organizational and business activities carried out by persons with different social and cultural backgrounds. Despite constant commitment, careful supervision and periodic awareness building, with the provision of specific information and training sessions, it is never possible to exclude episodic improper conduct in violation of policies, procedures and the Code of Ethics and, therefore, of current regulations concerning human rights by those who carry out activities on behalf of Prysmian, with consequent possible penalties, significant reputational damage and business impacts.

As an international business operating in many countries and communities, Prysmian is passionately committed to respecting and safeguarding the human rights of all employees and all those affected by our activities. The objective is to ensure that Prysmian is not involved in any way, either directly or indirectly, in activities that violate human rights.

## **How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour in Supply Chains**

Prysmian has to date not encountered situations of forced labour or child labour and has therefore not had to remedy and rectify such situations.



The planet's pathways

**Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Saskia Veerkamp

Prysmian North America CFO

May 29, 2022

A handwritten signature in blue ink, appearing to read 'S Veerkamp', with a stylized flourish at the end.

I have the authority to bind Draka Elevator Products, Prysmian Cables and Systems Canada, Ltd., General Cable Company Ltd., EHC Canada, Inc., and EHC Global Inc.