

WHISTLEBLOWING PORTAL

What is Whistleblowing?

Whistleblowing is the practice that protects who report to the organisation to which they belong, irregularities or hazards or risky situations that could damage the organisation itself or third parties. Legislative Decree No. 24 of 10 March 2023, which implements Directive (EU) 2019/1937 on Whistleblowing, introduced unified regulation of reporting channels and protection for whistleblowers in the public and private sectors, therefore also including TIM and the TIM Group companies.

Who can report a violation?

Anyone can make a report, including employees, former employees and job applicants, associates, customers, partners, suppliers (including contractors/subcontractors), self-employed workers or those with collaborative relationships, freelancers, consultants, agents and intermediaries, volunteers and trainees (whether paid or unpaid), or anyone who has a legitimate interest in the TIM Group's business activities.

What can be reported?

Any conduct, act or omission that has been committed or could be committed (on the basis of concrete elements), as well as conduct, including omissions, to conceal such violations. Information which could be reported is relating to TIM Group personnel and/or third parties concerning violations of laws and regulations, TIM Group Code of Ethics and Conduct, Organisational Model 231 and system of rules and procedures in place in the TIM Group. Commercial complaints, disputes or requests related to personal interests for which dedicated channels are available, are not included. It is important that the report is adequately substantiated: sufficient details to bring out (at least supposedly) specific and consistent circumstances and facts related to certain contexts, as well as to allow to identify elements useful to verify the validity of the report (e.g. elements that allow to identify the people involved, the context, the place and time when the facts took place, and supporting documentation).

Which channels should be used to report?

The internal reporting channels set up by TIM and the TIM Group Companies, are available on the "Whistleblowing" page on the TIM and its Subsidiaries website (if activated) and on the related company intranet pages.

The preferred channel is the online one, as it guarantees maximum confidentiality of the whistleblower's identity through the secure protocols and encryption tools. Reports can also be sent via a dedicated voicemail box, ordinary mail or verbally.

How can I access the Whistleblowing Portal?

The Whistleblowing Portal can be accessed from the "Whistleblowing" page on the TIM and its Subsidiaries website (if activated) and on the related company intranet pages. Once all the details have been filled out, the whistleblower must remind the date and the Unique Identification Code (alphanumeric ticket that uniquely identifies the report), which is automatically created by the Portal and allows to track the processing status of the report over time as well as to send and receive communications (also anonymously). Supporting documentation can be attached to the report, even after submission.

Who receives the reports?

Reports are received by the Supervisory Body of TIM or of the TIM Group company concerned, which is supported by the TIM Audit Department for deepening investigations. Within 7 days of receipt of the report, the whistleblower obtain the acknowledgement of receipt and within 3 months of such notice (or, in the absence of such notice, within 3 months of the expiry of the 7-day period after the report submission), he/she receive feedback on the action taken or intended to be taken on the report, specifying whether or not the report falls within the scope of Legislative Decree No. 24 of 10 March 2023.

I have received a report from a third party, what should I do?

Anyone who receives a report, in any form (written or verbal), must send it promptly (and in any case within 7 days of receipt) to the related Supervisory Body, also through the TIM Audit Department or the internal reporting channels, providing simultaneous notification to the whistleblower (if known) and ensuring absolute confidentiality. The original report must be sent, including any supporting documentation, as well as evidence that the whistleblower has been informed that the report has been

forwarded. The person who received and forwarded the report cannot keep a copy of the original he/she must delete any digital copies, without taking any independent analysis and/or investigation. Failure to disclose a report received as well as breach of the duty of confidentiality shall constitute a violation of the Whistleblowing Procedure and it could result in disciplinary action.

What are the protections?

- Without prejudice to legal obligations, the whistleblower's identity and any other information from which that identity could be directly or indirectly inferred, cannot be disclosed without his/her express consent. Confidentiality is also guaranteed to the persons involved and/or mentioned in the report and to the facilitators (i.e. those working in the same work environment and assisting the whistleblower in the reporting process).
- Any retaliatory act against the whistleblower shall be void. Those who believe they have suffered retaliation as a result of the report, they can notify to the ANAC. The protection measures, including the retaliation prohibition, also extend to facilitators, colleagues and relatives of the whistleblower and of legal entities connected to the whistleblower.
- Under certain conditions, there are limitations of liability in case of disclosure of information covered by secrecy obligations, copyright protection or personal data protection.
- Voluntary Sector entities, registered on the list published on the ANAC website, provide support (information, assistance and advice free of charge on how to report and on protection from retaliation) to whistleblowers.

Are anonymous reports allowed?

Anonymous reports can also be sent. The Whistleblowing Portal allow to establish a protected dialogue with the whistleblower (even anonymously), accessing it using the date of the report and the Unique Identification Code created when the report was submitted.

The guarantees and protections apply only to whistleblowers who have disclosed (even after the first dialogue) their personal details, which are in any case covered by absolute confidentiality.

Is there an authority that ensures the correctness of Whistleblowing systems?

The ANAC (National Anti-Corruption Authority) can be mobilised if the internal channel is not active or is not compliant, if the whistleblower has sent an internal report and has not received acknowledgement of receipt and/or feedback on the action taken, or if he/she has reasonable grounds to believe (on the basis of concrete circumstances and actually acquired information) that sending an internal report, it would not be effectively followed up or could lead to retaliation, or that the breach may represent an imminent or manifest danger to the public interest.

ANAC provides an IT platform that can be accessed from the institutional website.

Through the same IT platform, any retaliation believed to have been suffered as a result of the report can be notified to ANAC.