



# INSIDE INFORMATION AND INTERNAL DEALING PROCEDURE

UPDATED ON 29 JULY 2026

## A. General Principles

1. Information – defined as news about an event, circumstance, figure or initiative that is significant for Telecom Italia S.p.A. (“TIM” or the “Company”) or for its group (“TIM Group”) – is a fundamental company asset for the success of the business. Information underpins company processes and must be properly managed to ensure the Group's business objectives can be effectively pursued.
2. This Procedure is adopted in implementation of the Corporate Governance Code for companies listed on the Euronext Milan market organized and managed by Borsa Italiana, as well as in compliance with current European Union and national legislation on market abuse, including Regulation (EU) No. 596/2014 (“MAR”), as most recently amended by Regulation (EU) 2024/2809 (part of the so-called “Listing Act” package of measures), and the guidelines of the competent supervisory Authorities on market abuse. For anything not expressly provided for in this Procedure, the applicable statutory and regulatory provisions shall be deemed to be incorporated herein by reference, including the guidelines and orientations published by ESMA and Consob. Likewise, unless otherwise defined herein, the terms used in this Procedure shall have the meaning ascribed to them under the corresponding definitions contained in the reference legislation on market abuse and in the aforementioned guidelines and orientations published by ESMA and Consob.
3. Without prejudice to the specific legal regulations regarding the protection and disclosure of classified categories of information, the use of information about the TIM Group complies with the general principles of efficient use and safeguarding of business resources, as expressed by the ‘need to know’ rule. All those who work in the interest of the TIM Group are subject to an obligation of confidentiality with respect to information acquired or processed as a result of or in connection with the performance of their activities; they are prohibited from using such information unlawfully and/or for purposes other than the pursuit of the company’s business. Company procedures include specific safeguards for this purpose.
4. All those who work for the TIM Group (as employees or otherwise) are required:
  - to protect the information they acquire or process in the performance of their duties, taking all necessary precautions so that its circulation, within and outside the company, occurs in accordance with the specific applicable regulations, and without prejudice to its confidential nature;
  - to not disclose information about the TIM Group, its collaborators, commercial partners, suppliers or customers that becomes available to them in the performance of their assigned tasks other than for official reasons.
5. Without prejudice to the disclosure obligations laid down in the applicable regulations, TIM applies (and expects its collaborators to apply) specific safeguards to inside and relevant information – as referred to in Section B below – to protect and maintain confidentiality as per its own internal procedures.
6. This procedure (the “Procedure”)
  - establishes the rules and principles to which TIM adheres in monitoring the phases prior to publication and, in turn, in the internal management of the Company’s inside information and its disclosure externally;
  - regulates Company activities with reference to the obligations and requirements relating to internal dealing.
7. This Procedure serves as an instruction provided by TIM to all its subsidiaries pursuant to Article 114(2) of the Consolidated Law on Finance. This is an essential component of the TIM Group's internal control system, without prejudice to the application of the control schemes referred to in Model 231, with the respective flows of information.

## B. Identification of inside and relevant information

8. Inside information is defined at art. 7 of MAR. Inside information on TIM therefore refers to information that:
  - i. is accurate, meaning: (i) information refers to a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, and (ii) is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments issued by TIM or on the prices of related derivative financial instruments. In this regard, in the case of a protracted process that is intended to bring about, or that results in, a particular circumstance or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information;
  - ii. directly or indirectly concerns TIM, or one or more financial instruments issued by TIM;
  - iii. has not been made public and, if made public, could have a significant impact on the prices of the financial instruments issued by TIM or on the prices of related derivative instruments (price-sensitive information). This shall mean information that a reasonable investor would be likely to use as part of the basis of his or her investment decisions.
9. Where it meets the requirements set out above, even a single intermediate stage of a prolonged process that leads to a price-sensitive circumstance or event may be considered inside information (including the purpose of activation of the specific register of persons with access to inside information) even a single intermediate step in a protracted process.
10. The obligation to disclose to the public referred to in the subsequent Section D of the Procedure shall not apply to inside information relating to the intermediate steps of a protracted process, without prejudice to the provisions of the subsequent point 26, if such steps are connected with bringing about or resulting in particular circumstances or a particular event. The obligation to disclose to the public the final event or circumstance as soon as possible after its occurrence remains unaffected.
11. All company processes may potentially produce and/or intercept inside information and, therefore, information processed must be continually monitored, applying the assessment criteria indicated. Specific responsibility for identifying information that has (or is likely to have) the characteristics of inside information for TIM lies with the Company's Board of Directors, its Chairman and Chief Executive Officer ("Top Management"), as well as the first organizational tiers of Top Management, each with regard to the information that comes into their knowledge (that they ascertain) or that they produce/process (generate) as part of their activities.
12. The Company's General Counsel provides technical support (also in relation to the guidance issued by industry regulatory and corporate governance bodies), and must be consulted, together with the Head of the Investor Relations Department, for the assessment of the sensitivity of the information. In the case of prolonged processes that lead to a price-sensitive event or circumstance, the management overseeing the processes is required to make said assessment with the General Counsel as quickly as possible, i.e. as soon as they become aware of the essential elements (while the process is ongoing), and in any event at appropriate intervals based on the characteristics of the project.
13. In the event of differing opinions or uncertainty about whether or not a piece of information is inside information, or on who owns it, the decision shall be escalated to Top Management. In the presence of inside information relating to the intermediate steps of a protracted process, the activities planned for the disclosure to the public of the final circumstances or event pursuant to Section D of the Procedure shall be initiated promptly before the occurrence thereof
14. In order to timely fulfill the obligations to disclose inside information, TIM also monitors relevant information, meaning information that at a later, even near, stage, may become inside information based on the criteria referred to in Article 7 of the MAR previously mentioned. The responsibility for identifying specific relevant information rests with the same subjects who are responsible for identifying inside information.
15. Given that relevant or inside information concerning TIM may also relate to its subsidiaries, this Procedure

applies as an instruction to subsidiaries so as to ensure TIM has flows of information for the Company to properly monitor the circumstances and events relating to its subsidiaries.

## C. Obligations and prohibitions

16. By law and/or as part of their obligations towards the Company by virtue of their relationship, those who have access to TIM inside or relevant information are responsible for ensuring traceable processing and confidentiality of the information within their own sphere of activity and responsibility, from the moment it comes into their possession by any means.
17. Without prejudice to the safeguards applied for the protection of corporate information as per internal procedures, and without prejudice to the Company's compliance with the disclosure obligations under the applicable regulations, all of the following categories of persons in possession of inside information are subject to specific obligations and prohibitions:
  - a. Primary Insiders: anyone who comes into possession of inside information by virtue of (i) their membership of TIM's administrative, management or control bodies; (ii) their shareholding in TIM's capital; (iii) their exercise of an occupation, profession, function (including public functions) or office<sup>1</sup>; (iv) involvement in criminal activities and
  - b. Secondary Insiders: anyone who comes into possession of inside information for reasons other than those listed in point a) above, when this person knows, or should know, that those are inside informationIn any case, knowledge and application of the applicable EU and domestic regulations is the responsibility of the respective addressees.
18. TIM promotes training initiatives for its staff (including members of the company bodies) to ensure proper application of the rules on relevant or inside information and ensures that the relevant up-to-date legislation is made available.
19. TIM:
  - maps out and monitors the relevant information concerning it. To this purpose, as a reference, in the Annex A synoptic matrix is provided for reference purposes, illustrating:
    - i. an example (non-exhaustive) case study of events/activities where the respective information may be classified as relevant and/or inside information;
    - ii. the corporate departments normally involved in managing the above-mentioned events/activities, including their disclosure to the public where appropriate;
  - complies with the inside information disclosure obligations under the terms set out in section D below;
  - ensures that the lists of persons who have access to inside information and relevant information are drawn up, under the terms set out in section E below.

## D. Disclosure of sensitive information to the public

### Means of compliance

20. Without prejudice to the cases provided for under the previous point 10 and the subsequent point 24 TIM shall disclose to the public, as soon as possible, inside information which directly concerns it.
21. The drafting of the press release for the disclosure of inside information to the public is the responsibility of the Corporate Communication & Sustainability Department, which produces the draft based on the information/guidance received:
  - from the first organizational tiers of Top Management (or persons delegated thereby) in whose field

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<sup>1</sup> Based on case law and academic legal theory on the matter and according to the criteria defined by such guidance, the so-called "self-insider" may also fall within the definition of Primary Insider. This refers to an individual who possesses inside information relating to facts or decisions that they themselves contributed to forming or determining, and who uses such information to carry out transactions that constitute the offense of insider dealing.

- of operations the information was generated or ascertained;
- from the Secretary of the Board of Directors (or his/her delegate) regarding decisions made by the board of directors that are classified as sensitive information.
22. The Corporate Communication & Sustainability Department checks the information used to draw up the draft press release with the relevant management body, and then checks with the Investor Relations and Corporate Affairs Departments that the text meets the applicable legal requirements and, in any event, contains the appropriate elements to enable a complete and correct assessment of the events and circumstances represented therein. After this check, the draft press release is subject to final validation by Top Management prior to release.
23. It is the responsibility of the first organizational tiers of Top Management, each for their own areas of competence, to promptly inform the Investor Relations and Corporate Communication & Sustainability Departments of any change considered meaningful to the content of the inside information previously disclosed to the public, so that the need for any addition and/or correction and/or update of the disclosure previously made can be assessed with the General Counsel (without prejudice to the possibility of escalating the decision to Top Management in the event of differing opinions or uncertainty as to the need for disclosure).

#### Disclosure obligation and delays

24. Upon recognizing the inside nature of information, provided that the conditions indicated below are met, Top Management—having consulted the management responsible for the matter (or the Board of Directors, should the inside information consist of a resolution thereof), the Corporate Communication & Sustainability and Investor Relations Functions, as well as the General Counsel—may decide, in accordance with the law, to delay disclosure, within the limits and in the manner provided for by the applicable regulations. The non-disclosure of inside information relating to the intermediate steps of protracted processes is not subject to the rules on delay.
25. Communication's delay is permitted only in the following cases:
- i. immediate disclosure is likely to prejudice the legitimate interests of the Company;
  - ii. the inside information whose disclosure is delayed is not in contrast with the latest public announcement or other type of communication from the Company on the same matter to which the inside information relates;
  - iii. the Company is able to ensure the confidentiality of that information
26. If the confidentiality of delayed inside information (pursuant to points 24-25) or intermediate steps (not disclosed per point 210) is no longer ensured, the Company must publicly disclose it immediately. Confidentiality is considered lost if a rumor is sufficiently accurate regarding such delayed or undisclosed information, indicating it is no longer confidential.
27. In the event of any specific leaks of non-public relevant information, the relevant first-tier manager (or their delegated representative) shall consider, with the General Counsel, which for this purpose shall coordinate with the Heads of the Investor Relations and Corporate Communication & Sustainability Departments, whether to release further press releases to provide clarification. In the event of differences of opinions or uncertainty as to the need for disclosure, the decision shall be escalated to Top Management.
28. TIM excludes any responsibility for so-called 'consensus estimates'. Furthermore, with particular regard to disclosed targets and guidance, it monitors them by assessing the financial analyses published and makes them available to the public in a transparent, objective and traceable way. If there are significant differences between the market expectations and the Company's expected results, the Company's Chief Financial Officer shall consider, with the General Counsel and the Heads of the Corporate Communication & Sustainability and Investor Relations Departments, whether it is appropriate or required to release suitable clarifying press releases and/or to re-establish information equality. In the event of differing opinions or uncertainty as to the need for disclosure, the decision shall be escalated to Top Management.

#### Roles

29. TIM's General Counsel acts as information reporting officer and is the Company's spokesperson for the stock exchanges that list the financial instruments issued by the Company, as well as for the Italian or foreign authorities that oversee the corresponding markets. The General Counsel is also responsible for managing the process and requirements resulting from a decision by Top Management to use the

procedure to delay disclosure of the inside information to the public.

30. Relations with the press are the responsibility of the Corporate Communication & Sustainability Department. Interviews and statements concerning the Company may be provided by the Chairman, the Chief Executive Officer or persons authorized by them, upon proposal of said Department, which shall agree in advance with the person involved the content of the interview or statement and, where further attention is required, shall coordinate with the General Counsel for the necessary assessments. Where inside information is involuntarily disclosed during an interview or statement, information equality is promptly re-established by way of a press release. Any declarations concerning specific relevant information (e.g., information regarding the status of ongoing negotiations which do not yet constitute inside information) are based on prudence criteria so as to avoid creating misleading expectations or effects.
31. Relations with the financial community are the responsibility of the Investor Relations Department. When company results and targets are disclosed, and, in general, at meetings with investors and analysts, the initiatives and communication tools are coordinated by the Investor Relations Department, which activates the internal departments responsible for fulfilling the obligations required by applicable regulations (including the drafting and release of the necessary press releases, as per the process described above) and directly helps to guarantee information equality by publishing on the company website all information made available to the financial community at meetings, conferences and road-shows. The Investor Relations Department is also responsible for collecting and periodically publishing the consensus on the company website.
32. The decision of whether to go ahead with any market surveys (market sounding and wallcrossing) or to give the Company's consent to receive any market surveys conducted by third parties lies with the Chief Financial Officer, who shall consult the General Counsel for this purpose.

## E. List of persons with access to inside or relevant information

33. TIM shall fulfil its obligation to trace its inside information and keep registers of persons who have access to it, whether inside or outside the company organization. For this purpose, it has specific software that meets the requirements set out in the applicable regulations, the responsibility of which lies with the General Counsel.
34. The software has features that enable the company to comply with its obligations to inform those who have access to inside information (and, in turn, are listed in the corresponding registers) about the related obligations and prohibitions, as well as the applicable sanctions for breaching said obligations and prohibitions. The software is organized into sections corresponding to specific inside information, listing the people who have access thereto. As a result, the same person may be listed in more than one section, each corresponding to an item of inside information.
35. As a minimum, the Chairman, the Chief Executive Officer, their staff, the Chief Financial Officer, the Head of Investor Relations, the Head of Corporate Communication & Sustainability and the General Counsel are listed in a special supplementary section, since they have permanent access to all Company information classified as inside information. With the exception of the supplementary section on those who have permanent access, each section of the register is created in response to the existence of a specific item of inside information, pending its disclosure.
36. Responsibility for populating and updating the register lies with the first-tier manager (or his/her delegated representative) responsible for the activity carried out regarding the event/circumstance to which the inside information refers: this person is responsible for obtaining, updating and promptly disclosing to the General Counsel all data that is to be entered in the register, as required by the applicable regulations.
37. People who have access to information that, while confidential and significant in business and strategic terms, is not for market disclosure pursuant to the law on inside information, are not subject to listing in the register, nor are people who have access to items of information that would constitute inside and/or relevant information only if combined with other information.
38. With a view to better monitor corporate information and to fulfil the requirements for market disclosure of inside information, TIM also keeps a register of the persons who have access to relevant information, which is managed through specific software and monitored by the General Counsel.

39. The responsibility for creating the register in relation to specific relevant information, as well as for registering the internal or external individuals in possession thereof, lies with the first-tier manager (or his/her delegate) who oversees the activity carried out on the event/circumstance to which the relevant information refers, after consulting the General Counsel and the Head of the Investor Relations Department as appropriate.
40. The first-tier manager, directly or through his/her delegate, is responsible for:
- identifying relevant information;
  - identifying the persons who are in possession of relevant information in relation to each open position;
  - notifying the persons in possession of relevant information of their being listed on the register, as well as any updates concerning them.

With regard to the requirements relating to the management of the register and, specifically, to annotations (registrations, cancellations) and updates, reference should be made to the relevant procedural system set out at company level.

41. The Corporate Affairs Department:
- oversees entries on the registers dedicated to managing inside information based on the data received and keeping track of the requests/notifications received. Entry onto the register occurs as soon as there are sufficient details to identify the person with access to inside and/or relevant information, subject to subsequent completion with the data initially missing;
  - oversees the data extracted from the registers of persons with access to inside and relevant information, keeping track of the requests received;
  - monitors the completeness of the data entered on the registers, taking prompt action against the owners responsible for populating them in the event of evident irregularities;
  - contacts the owners responsible for populating the lists and raises their awareness about the need to update the data recorded in the software at least once a month;
  - drafts and submits to the General Counsel, at three-monthly intervals, a report on the maintenance of the registers;
  - supplies quarterly information to the Supervisory Body pursuant to Legislative Decree No. 231/2001.

## F. Internal dealing

42. The disclosure obligations for transactions involving financial instruments issued by TIM, or derivatives or other financial instruments linked thereto—as identified under the MAR—carried out by the following parties are regulated below:
- by people discharging managerial, supervisory, or administrative responsibilities within TIM (the “Relevant Subjects”), namely Directors, Statutory Auditors, and Key Managers (senior executives of TIM who, while not Directors or Statutory Auditors of TIM, have regular access to inside information relating, directly or indirectly, to TIM and possess the power to take managerial decisions affecting the future development and business prospects of TIM, as identified on the basis of the company's organizational structures);
  - people closely linked to them (“Secondary Insiders”), as identified by current legislation,
43. Without prejudice to the provisions of the subsequent point 45, Relevant Subjects and Persons Closely Associated shall promptly disclose to Consob and the Company—no later than three business days after the date of the transaction—the transactions relevant for the purposes of internal dealing regulations carried out by them or on their behalf. Upon receipt of the notification, TIM shall disclose it to the public—through the specific regulated information distribution system—promptly and, in any case, within two business days after receiving all the information requested by it.
44. At the request of the Primary Insiders, TIM makes itself available to make the notifications to Consob on their behalf and on behalf of the Secondary Insiders. For this purpose, the information to be disclosed must be made available to the Corporate Affairs Department by the end of the working day following the

execution of the transaction. Subject to possible exceptions, which the Company reserves the right to communicate to Primary Insiders without delay.

45. The following types of transactions carried out by Relevant Subjects and Persons Closely Associated shall not be subject to prompt notification to Consob and disclosure to the public:
- i. transactions whose total amount does not reach the threshold of EUR 50,000 within a calendar year, or any other threshold provided for under current legislation, calculated by aggregating, without netting, all transactions carried out by the same subject directly or on their behalf<sup>2</sup>;
  - ii. any other transactions for which notification is not required under the legislation applicable to Relevant Subjects and Persons Closely Associated.
46. TIM draws up and keeps updated the list of Relevant Subjects and—on the basis of the information received from them—of Persons Closely Associated. To collect the necessary information, the Company contacts the Relevant Subjects, providing them with specific templates to notify their respective Persons Closely Associated of their status as such and of their obligations.
47. Without prejudice to the regulations on insider dealing, unlawful disclosure of inside information, and market manipulation, Relevant Subjects are prohibited from carrying out transactions, directly or indirectly, on their own account or for the account of a third party, involving financial instruments issued by TIM, or derivatives or other financial instruments linked thereto, during a closed period of 30 calendar days prior to the announcement of the financial reports that TIM is required to make public pursuant to national law (the so-called legal closed period, concerning annual and semi-annual financial reports only).
48. The Company reserves the right to permit trading, on their own account or for the account of a third party, during a closed period to Relevant Subjects who submit a reasoned request, in compliance with the conditions provided for by law. The request shall be submitted to the General Counsel, and authorization shall be granted subject to the binding opinion of the Nomination and Remuneration Committee, which shall be convened for this purpose without delay.
49. TIM sends specific reminders to Relevant Subjects regarding the start and end of the legal closed period, based on the corporate calendar for financial approval and disclosure.

## G. Compliance, reporting and sanctions

50. This Procedure is published on the Company website and intranet. The Group Compliance Officer, in agreement with the General Counsel and the Chief Human Resources & Organization Office, is responsible for the execution of appropriate initiatives to raise awareness/provide training with respect to the Procedure.
51. Breaching the legal regulations on sensitive information shall entail individual liabilities (criminal and administrative) for the breaching party, as well as liabilities for the Company.
52. Compliance with the obligations and prohibitions resulting from this Procedure is considered an integral part of the obligations towards TIM assumed by its collaborators. Therefore, non-compliance may constitute non-fulfilment, with all its legal and contractual consequences, including termination of the contract or assignment and the payment of compensation for damages.
53. Without prejudice to any further legal action for damages and compensation, breach of the Procedure may therefore entail:
- for employees, the application of disciplinary sanctions as set out in the legal regulations and collective agreement, by way of the applicable procedures;
  - for external collaborators, termination of the collaboration or consultancy relationship and, in any case, exclusion from being assigned new tasks by Group companies;
  - for members of Company administration and control bodies, notification to these bodies for it to adopt the most appropriate measures, including revocation of mandate, within the limits permitted by the applicable regulations.

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<sup>2</sup> Once the total amount of € 50,000 is reached, Relevant Subjects and Persons Closely Associated must disclose all transactions carried out during the calendar year, regardless of their value. For the purposes of reaching this amount, ESMA has clarified that transactions carried out directly by (or on behalf of) Relevant Subjects are not aggregated with those carried out directly by (or on behalf of) Persons Closely Associated.

54. The state of compliance with the Procedure is the subject of a report by the Group Compliance Officer in his/her periodic report to the Control and Risk Committee and the Supervisory Body pursuant to Legislative Decree No. 231/2001.

## H. Updates

55. The General Counsel is responsible for updating the Procedure, in coordination with the Group Compliance Officer. The General Counsel ensures the monitoring of further level 2 measures (RTS/ITS) and guidelines issued by ESMA and Consob on market abuse and the management of inside information, proposing, where necessary, timely updates to the Procedure.
56. The Company's Board of Directors is responsible for making amendments to the Procedure, with the sole exception of the updates required by new regulatory provisions or internal organizational changes. In this case, the amendment to the document is carried out by the Chairman of the Board of Directors, who informs the full board thereof at its earliest possible meeting.

## ANNEX A - MAPPING OF RELEVANT INFORMATION – COMPETENT ORGANISATIONAL DEPARTMENTS (FOCIP)

| TYPE OF RELEVANT INFORMATION                                                                                                                                                                                                      | LEGAL, REGULATORY AND TAX | CORPORATE COMMUNICATION & SUSTAINABILITY | CHIEF FINANCIAL OFFICE | INVESTOR RELATIONS | CHIEF HUMAN RESOURCES & ORGANIZATION OFFICE | CHIEF PUBLIC AFFAIRS & SECURITY OFFICE | CHIEF STRATEGY, BUSINESS DEVELOPMENT & WHOLEBUY OFFICE | AUDIT /COMPLIANCE DEPARTMENT | CHIEF INFORMATION TECHNOLOGY OFFICE | CHIEF TECHNOLOGY OFFICE | CHIEF CONSUMER, SMALL & MEDIUM A N D MOBILE WHOLESALE MARKET OFFICE | CHIEF ENTERPRISE AND INNOVATIVE SOLUTIONS OFFICE |
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| <b>a) Institutional Information</b>                                                                                                                                                                                               |                           |                                          |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 1a. Resignations or appointments of Directors or Statutory Auditors and changes to the Company's strategic personnel (e.g., renewal of board bodies, resignations and appointments of Key Managers)                               | X                         | X                                        | X                      | X                  | X                                           |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 2a. Changes to the control of the company and control agreements                                                                                                                                                                  | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 3a. Changes to the company bylaws/articles of association                                                                                                                                                                         | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>b) Information on the business or other significant events</b>                                                                                                                                                                 |                           |                                          |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 1b. Transactions to acquire or dispose of major assets, including transactions carried out by means of conferment of assets. This includes the acquisition or disposal of shareholdings, other businesses or branches of business | X                         | X                                        | X                      | X                  | X                                           |                                        | X                                                      |                              | X                                   | X                       | X                                                                   | X                                                |
| 2b. Merger and demerger operations                                                                                                                                                                                                | X                         | X                                        | X                      | X                  | X                                           |                                        | X                                                      |                              | X                                   | X                       | X                                                                   | X                                                |
| 3b. Entry into, or withdrawal from, a business sector                                                                                                                                                                             | X                         | X                                        | X                      | X                  |                                             |                                        | X                                                      |                              | X                                   | X                       | X                                                                   | X                                                |
| 4b. Major changes to investment policy                                                                                                                                                                                            | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 5b. Signing, amendment or cessation of major agreements or contracts (e.g., signing, amendment or cessation of joint venture agreements, agreements with public sector bodies or partner companies)                               | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 6b. Conclusion of processes regarding intangible assets such as inventions, patents or licences                                                                                                                                   | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 7b. Restructuring or reorganization that impact assets and liabilities, the financial position or expected profit and loss                                                                                                        | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 8b. Insolvency of debtors or major suppliers with which particularly valuable contracts have been signed                                                                                                                          | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 9b. Damage or deterioration of major assets                                                                                                                                                                                       | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 10b. Cancellation of guaranteed borrowing facilities (lines of credit) by financial institutions                                                                                                                                  | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |

| TYPE OF RELEVANT INFORMATION                                                                                                                                                                          | LEGAL, REGULATORY AND TAX | CORPORATE COMMUNICATION & SUSTAINABILITY | CHIEF FINANCIAL OFFICE | INVESTOR RELATIONS | CHIEF HUMAN RESOURCES & ORGANIZATION OFFICE | CHIEF PUBLIC AFFAIRS & SECURITY OFFICE | CHIEF STRATEGY, BUSINESS DEVELOPMENT & WHOLEBUY OFFICE | AUDIT /COMPLIANCE DEPARTMENT | CHIEF INFORMATION TECHNOLOGY OFFICE | CHIEF TECHNOLOGY OFFICE | CHIEF CONSUMER, SMALL & MEDIUM A N D MOBILE WHOLESALE MARKET OFFICE | CHIEF ENTERPRISE AND INNOVATIVE SOLUTIONS OFFICE |
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| <b>c) Information regarding data on accounts and operations</b>                                                                                                                                       |                           |                                          |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 1c. Forecast data, quantitative targets and accounting data on change to expected results                                                                                                             | X                         | X                                        | X                      | X                  | X                                           | X                                      | X                                                      | X                            | X                                   | X                       | X                                                                   | X                                                |
| 2c. Losses such as to have a significant effect on the company's shareholders' equity                                                                                                                 | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 3c. Preparation/Approval of accounting information for the period, including the reports of the external auditor if the information presents significant deviations from the expected accounting data | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 4c. Resignation of the external auditor. Replacement of the external auditor.                                                                                                                         | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 5c. Issue by the external auditor of a report with comments, a negative report or a statement that it cannot issue a report.                                                                          | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 6c. Major changes in the value of the assets                                                                                                                                                          | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>d) Information on transactions involving share capital, bonds and dividends</b>                                                                                                                    |                           |                                          |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 1d. Issue or repurchase of bonds and other debt securities that are traded in regulated markets                                                                                                       | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 2d. Transactions involving share capital or the issue of warrants                                                                                                                                     | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 3d. Transaction involving treasury shares or other listed financial instruments                                                                                                                       | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 4d. Changes to the rights of listed financial instruments                                                                                                                                             | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 5d. Remuneration plans based on shares or other financial instruments targeted at management or employees                                                                                             | X                         | X                                        | X                      | X                  | X                                           |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 6d. Distribution of dividends or changes affecting dividend policy                                                                                                                                    | X                         | X                                        | X                      | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>e) Information on legal, judicial or extrajudicial matters</b>                                                                                                                                     |                           |                                          |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 1e. Legal disputes and extrajudicial issues (e.g., agreements with professional associations)                                                                                                         | X                         | X                                        |                        | X                  | X                                           | X                                      |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 2e. Requests for admission to insolvency proceedings                                                                                                                                                  | X                         | X                                        |                        | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| 3e. Submission of applications seeking admission to insolvency proceedings or orders mandating said proceedings                                                                                       | X                         | X                                        |                        | X                  |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>f) Penalties, decisions and requests from regulators</b>                                                                                                                                           | X                         | X                                        |                        | X                  |                                             | X                                      |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>g) Denials, corrections and clarifications regarding press rumors</b>                                                                                                                              | X                         | X                                        |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>h) Information on Governance</b>                                                                                                                                                                   | X                         | X                                        |                        |                    |                                             |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |
| <b>i) Remuneration of Top Management</b>                                                                                                                                                              | X                         | X                                        |                        |                    | X                                           |                                        |                                                        |                              |                                     |                         |                                                                     |                                                  |