



Whistleblowing Portal

- [Who can submit a report?](#)

Anyone: employees, partners, customers, suppliers, consultants, associates and, more generally, any third party.

- [Is it mandatory to identify oneself in order to submit a report?](#)

No, it is not mandatory, nor is it necessary to provide your data. However, in the event that the report does not contain sufficient details, the lack of the whistleblower's contact information makes it impossible to request additional details to investigate the reported facts.

- [Is an anonymous report still investigated?](#)

All reports, including anonymous ones, are subject to analysis and investigation. However, in cases where it is necessary to acquire additional and more details to support what has been reported, the lack of contact information for the whistleblower could make a precise analysis of the report difficult.

- [What can be reported?](#)

Any fact or behaviour (even by omission or only potentially damaging) of which one becomes aware and which may cause damage or harm to TIM, Group companies or third parties. Unlawful conduct, violations of the Code of Ethics, of the 231 Organisational Model, and of the Group's rules and procedures and/or laws and regulations may therefore be reported.

On the submission/transmission of reports page, there is a detailed list of issues that can be reported, with some examples.

Commercial customer complaints for which TIM has set up special communication channels and complaints of a personal nature are excluded.

- [What does reporting in “good faith” mean?](#)

Reporting in “good faith” is defined as reporting made without the intention of gaining an advantage for oneself or third parties or to cause unjust damage to the reported person.

- [What is meant by a substantiated report?](#)

The report, in order to be sufficiently detailed, must provide useful and sufficiently specific elements to allow for the necessary checks which will be used to assess the validity of the facts and the related responsibilities (by way of example: clear and complete description of the facts reported, reference period, person(s) who committed the acts, any documents supporting what has been described).



- [I have received a report from a third party: what should I do?](#)

The report must be posted on the Whistleblowing Portal in good time, indicating your contact details if necessary.

- [Who examines the reports and investigates them?](#)

All reports are taken over by the Supervisory Board, which arranges for the necessary in-depth investigations with support from the TIM Audit department.

- [What is the Unique Identification Code?](#)

The Unique Identification Code is an alphanumeric number that uniquely identifies the report, guaranteeing the complete anonymity of the whistleblower. The code is automatically generated by the Portal once a report has been submitted and allows the whistleblower to track the status of the report over time by entering this code and the date of entry of the report.

- [Can I check on the status of a report?](#)

After the report has been entered, the whistleblower can check its status at any time by clicking on the appropriate link on the portal and typing in the Unique Identification Code and the date on which the report was entered.

- [What are the report status stages?](#)

The whistleblowing report will go through the following stages:

- **in progress**: the report has been correctly entered and the preliminary investigation is underway to analyse and verify the validity of the reported facts;
- **suspended** (possible stage): further details need to be acquired to allow an in-depth analysis of the report. The whistleblower must enter a new report, with explicit reference to the original report, providing the details indicated in the reasons for the suspension;
- **archived**: the preliminary investigation has been completed and the Supervisory Board has decided to close the file.

- [Can I attach documentation to the report?](#)

Documentation can always be attached.

- [What protections are in place for the whistleblower and the reported person?](#)

When handling reports, the confidentiality of the content and identity of the whistleblower is guaranteed, except in the following cases:

- if criminal liability for slander or defamation or, in any event, offences connected with the Whistleblowing report is established, including by first degree sentencing, or civil liability for the



same, in cases of wilful misconduct or gross negligence;

- at the request of the Judicial Authority or other claimants.

Retaliatory or discriminatory acts, direct or indirect, affecting the work or personal life (e.g. dismissal, suspension, non-promotion, change of workplace) are also prohibited against the whistleblower.

- How are personal data processed?

All information and personal data acquired are processed with respect for the fundamental rights and freedoms and the dignity of the persons concerned, in terms of confidentiality and data security and in compliance with Regulation 2016/679/EU (General Data Protection Regulation). The privacy policy is available at the following link. [[Portale Segnalazioni \(telecomitalia.it\)](https://www.telecomitalia.it/Portale_Segnalazioni)]

- What standards are in place to ensure information security and data protection?

In order to guarantee the confidentiality of the identity of the whistleblower, the content of the report, the documentation enclosed therein, and the identity of any reported persons, the company has equipped itself with specific software, access to which is permitted only to authorised persons, and which uses secure protocols (HTTPS) and encryption tools for data transmission and storage.