



SUSTAINABILITY REPORTING

*PURSUANT
TO ITALIAN LEGISLATIVE
DECREE 125/24*

2025

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1. GENERAL INFORMATION

Methodological note and reporting perimeter

Disclosure Requirement BP-1 – General basis for preparation of sustainability statements

[5 a]; [5 b i, ii]; [5 c, d, e]

Reporting principles

The TIM Group Sustainability Reporting is prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD), transposed into Italian law with Legislative Decree 125/2024, and in line with the ESRS Standards. The "Environment" section includes the information required by Article 8 of Regulation 852/2020 "European Taxonomy" and the related delegated acts. The Reporting is prepared on a consolidated basis and was approved by the Board of Directors (hereinafter "Board of Directors") on March 11, 2026.

The Sustainability Reporting includes data and information relating to TIM S.p.A. (Parent Company) and its subsidiaries consolidated on a line-by-line basis as of December 31, 2025, in line with the scope of the consolidated financial statements of the TIM Group, except for the specificities indicated below. The perimeter includes all group companies that meet specific materiality criteria. It also includes the Sparkle Group which, as of the same date, is still an integral part of the TIM Group, although in the consolidated financial statements it has been classified as Discontinued Operations pursuant to IFRS 5, as an asset intended for sale.

Thematic reporting perimeters

The thematic reporting perimeters are defined starting from the consolidation perimeter as of December 31, 2025 and applying specific criteria of significance, as described below.

Environmental perimeter

With reference to the methods of calculating the environmental perimeter, the scope of analysis was defined starting from the consolidated financial statements for the half-year ended June 30, 2025 of the Domestic Business Unit, taking into account the changes that occurred in July 2024.

Companies that meet at least one of the following materiality criteria were included in the analysis:

- 0,5% of total turnover (k€);
- 0,5% of the total number of employees (no.);
- 0,1% of total expenditure on energy and fluids (k€).

Based on these criteria, the following **11 companies** fall within the environmental perimeter: TIM S.p.A.; Telecom Italia Sparkle S.p.A.; TI Sparkle Greece; TI Sparkle Turkey; Panama Digital Gateway; Noovle S.p.A.; Olivetti S.p.A.; Telecontact Center S.p.A.; Telsy S.p.A.; TIM Retail S.r.l.; TIM S.A..

Of these, 10 companies fall within the perimeter of the domestic business unit, while TIM S.A. is included in the Brazil perimeter.

In the context of specific environmental disclosure obligations, the term "Domestic BU" (or "Tim Domestic") identifies the companies included in the environmental perimeter, excluding TIM S.A. ("Brazil" perimeter).

Social perimeter

In the social field, the data relating to the workforce include all group companies in which at least one employee is present during the year, in line with the scope of the consolidated financial statements.

As of December 31, 2025, **17 companies** fall within this perimeter: TIM S.p.A.; Telecom Italia Sparkle S.p.A.; Noovle S.p.A.; Noovle Malta¹; Olivetti S.p.A.; Telecontact Center S.p.A.; Telsy S.p.A.; TIM Retail S.r.l.; TI Trust Technologies S.r.l.; QTI S.r.l.; Mindicity S.r.l.; foreign companies controlled by Telecom Italia Sparkle S.p.A.; TIM San Marino S.p.A.; Telefonía Mobile Sammarinese S.p.A.; TIM Finance S.p.A.; TIM Capital; TIM S.A.

Of these, 14 companies fall within the perimeter of the "Domestic BU" (or "Tim Domestic"), TIM SA enters the Brazil perimeter, while TIM Finance and TIM Capital are referred to as "other".

With reference to specific datapoints provided for by the ESRS S1 "Own workforce" disclosure obligation, the presentation of separate data by country is required on the basis of a materiality criterion, identified as 50 or more employees representing at least 10% of the total employees of the Group. The application of this criterion involves the identification of operating companies in Italy and Brazil. The "Italy" perimeter includes: TIM S.p.A., Telecom Italia Sparkle S.p.A., Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies S.r.l., QTI S.r.l. and Mindicity S.r.l..

For certain disclosure obligations provided for by the CSRD, the Group also reports, for the purposes of completeness of disclosure, initiatives carried out by the TIM Foundation in Italy and by the TIM Institute in Brazil. These entities, with independent legal personality and separate financial statements, do not fall within the scope of consolidation of the Group; however, their activities, aimed at promoting social impact projects in the areas of inclusion, education, and skills development, contribute to the generation of positive impacts on the territories and reference communities.

¹Despite having no employees as of December 31, 2025, Noovle Malta is included in the reporting scope as it had employees during the year up to December 1, 2025 and therefore contributed to the social data being reported.

Consideration of the value chain and completeness of disclosure

The Sustainability Reporting takes into account, where relevant and possible, the value chain as well, in order to provide a complete representation of the impacts, risks and opportunities related to the Group's activities, including the actors involved both upstream and downstream. This approach is applied, first of all, in the materiality analysis of impacts, risks, and opportunities (IROs), where it is specified whether they refer to the Group's activities or to the related value chain (see "SBM-3 disclosure obligation – Material impacts, risks, and opportunities and their interaction with the strategy and business model").

Information in the context of policies, objectives and initiatives involving upstream or downstream actors is provided according to the same principle; Similarly, the metrics also include, where applicable, value chain data, as in the case of Scope 3 greenhouse gases emissions.

In preparing the Sustainability Reporting, the TIM Group also provided complete disclosure with reference to sensitive information, including that relating to patents, intellectual property, know-how and innovation results, without availing itself of the exemptions provided to protect any competitive advantages.

Similarly, information likely to influence the market or shareholders, including information relating to financial news, material changes or matters under negotiation or development, has been provided without recourse to the exemption provided for imminent developments or matters under negotiation.

Disclosure Requirement BP-2 – Disclosure in relation to specific circumstances

[9 a, b]; [10 a, b, c, d]; [11 a, b i,ii]; [13 a, b, c]; [14 a, b, c]; [15]; [16]

Reference time horizons

The following reference time horizons are adopted in the sustainability reporting, in order to ensure a consistent reading of the analyses, targets and risks related to sustainability issues:

- Short term: 1 year;
- Medium term: within 5 years;
- Long term: over 5 years.

In 2025, the medium- and long-term time horizons were updated compared to those defined in the previous financial year, in order to align their definitions with those suggested by ESRS 1. The new timeframe is in line with the reference framework used for updating the analysis of impacts, risks and opportunities, as well as with the definition of the Plan's ESG targets.

Methodological criteria, estimates and information limitations

In the area of Sustainability Reporting, in order to ensure a complete and transparent representation of the information, any estimates or assumptions used are also reported, as well as possible limitations in the availability of data.

Following the spin-off of the company's NetCo branch, which took place in July 2024, a master service agreement was signed that governs the relations between TIM S.p.A. and FiberCop. In the absence of specific criteria for allocating consumption, the Group resorted, where necessary, to estimates based on the best information available for the determination of data relating to the offices used by TIM staff and the infrastructures in colocation.

With reference to some calculations relating to Scope 3 emission categories, the Group used assumptions and data from third party sources. The estimates and assumptions adopted are based on consolidated and internationally recognized sources and do not present a significant level of measurement uncertainty. Further information on the methods applied can be found in the dedicated paragraphs.

In relation to the information limitations described above, for some metrics that require additional data or more articulated collection systems, the Group has adopted a gradual implementation approach (phase-in), as required by ESRS 1 with the aim of achieving full coverage within the deadlines provided for by the legislation. Forward-looking information has been developed based on assumptions and estimates relating to future events and the possible actions that the Group may undertake.

Also with reference to the financial information associated with the shares, some methodological clarifications are reported. In general, where relevant, operating expenses (OpEx) and capital expenditure (CapEx) related to the initiatives are indicated. For some actions, this information cannot be provided in a timely manner, due to the non-univocal nature of the expenses (e.g. indirect costs, shared costs or Intercompany costs), nor is an analytical reconciliation between OpEx and CapEx of the individual actions and the specific items of the consolidated income statement of the TIM Group always available.

A process of strengthening the methods of data collection and monitoring is currently underway, aimed at improving the level of information detail in the Group's next reporting cycles. At present, on the basis of the nature of the initiatives, it is possible to make a high reference to the relevant notes of the consolidated financial statements.

CapEx

No. 5 Intangible assets:

- Industrial patents and intellectual property rights
- Concessions, licenses, trademarks and similar rights
- Intangible assets with a finite useful life

- Work in progress and advance payments

No. 6 Tangible assets:

- Land
- Buildings (civil and industrial)
- Plant and equipment
- Manufacturing and distribution equipment
- Other assets
- Construction in progress and advance payments

No. 7 Rights of use:

- Property
- Plant and equipment
- Other tangible assets
- Construction in progress and advance payments
- Intangible assets

OpEx

No. 28 Acquisition of goods and services:

- Purchase of raw materials and goods
- Costs of services:
 - Revenues due to other TLC operators
 - Costs for telecommunications network access services
 - Hosting and delivery
 - Commissions, sales commissions and other selling expenses
 - Advertising and promotion expenses
 - Professional and consulting services
 - Utilities
 - Maintenance costs
 - Outsourcing costs for other services
 - Mailing and delivery expenses for telephone bills, directories and other materials
 - Other service expenses
- Lease and rental costs:
 - Rent and leases
 - TLC circuit subscription charges
 - Other lease and rental costs

No. 29 Employee benefits expenses:

- Ordinary employee expenses:
 - Wages and salaries
 - Social security expenses
 - Other employee benefits
- Costs and provisions for agency contract work
- Miscellaneous expenses for employees and other labor-related services rendered:
 - Expenses for corporate restructuring and termination benefit incentives
 - Other

Methodological evolution and comparability of emissions

In relation to the 2024 reporting period, for which the emission categories of Scope 3 no. 1, 2, 3, 11 and 12 had been published, during 2025 the TIM Group embarked on a **structured path of methodological evolution aimed at increasing the accuracy and reliability of the calculation of emissions**, with particular reference to categories 1, 3 and 11.

In particular, within Category 1 (goods and services purchased) a more advanced methodology (Average-data method) has been applied to device purchases; in Category 3 (activities related to fuels and energy), the accounting of grid losses associated with the supply of renewable energy has been integrated, in line with ISO 14064; for Category 11 (use of products sold), the emission factors relating to smartphones were updated, using more accurate and representative data.

The retroactive application of these methodological refinements to the 2024 data has been the subject of analysis; however, since the overall deviation from the published values was lower than the materiality threshold (about -3.4% at Group level), it was not considered necessary to carry out a restatement of the 2024 data. The new methodologies are therefore applied from 2025.

During 2025, a methodological refinement and an **expansion of the reporting perimeter** was carried out, through the integration of **additional Scope 3 categories** applicable to the TIM Group (Categories 4, 5, 6, 7, 9, 13, 14 and 15).

These categories have also been calculated with reference to 2024 for comparative purposes, consolidating **2024** as the **baseline** year to support the new transition plan, which is expected to be finalized during 2026 (see disclosure obligation E1-1 "Transition plan for the mitigation of climate change").

Revisions and Adjustments of Energy and Emissions Data

During 2025, a review of energy consumption data was also carried out for the calculation of Scope 1 greenhouse gases (GHG) emissions for the year 2024, with the aim of consolidating the quality of the data reported in a context characterized by significant organizational discontinuity and with a view to continuous improvement. In this consolidation activity, an adjustment was also made to some consumption of specific Group entities, in particular TIM S.p.A.

In accordance with the principles of transparency, reliability, and comparability of reporting provided for by the CSRD and the ESRS, these consumptions have been reprocessed and correctly reallocated to the competent entities, with the consequent updating of the aggregated values of energy consumption and Scope 1 emissions reported for 2024. The data have therefore been rectified and correctly relocated to the reference tables.

An update was also made regarding the emission factor used for the calculation of Scope 1 biogenic emissions for 2024; the data were then recalculated and updated to ensure accuracy and comparability.

Information scope and references to other sections

With a view to completeness and transparency of disclosure, the TIM Group includes in its Sustainability Reporting, where relevant, also information required by other regulations or generally accepted standards; in the event of partial application of these references, specific references are provided to the paragraphs applied.

In order to facilitate consultation of the document, some information is also provided by referring to other sections of the reporting, with explicit indication of the ESRS information obligation or the specific reference element (for example: "see ESRS 2 GOV-3 disclosure requirement – Integration of sustainability performance into incentive systems").

Corporate Governance

Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies

[21 a, b, c, d, e]; [22 a, b, c i, ii, iii, d]; [23 a, b]; [G1 GOV-1 5 a]

Composition and characteristics of the administrative and supervisory bodies

The Board of Directors of TIM S.p.A., appointed by the Shareholders' Meeting of April 23, 2024 for the three-year period 2024-2026, is composed of **nine Directors**, including one Executive Director (the CEO, who is also appointed as General Manager) and eight non-executive Directors, including the Chairman of the Board of Directors.

As of December 31, 2025, the composition of the Board remains unchanged, with the exception of the co-option of Alessandra Perrazzelli to replace the resigning Director Domitilla Benigni, approved on September 25, 2025. From January 1, 2026, the resignation of Director Umberto Paolucci and the simultaneous co-option of Lorenzo Cavalaglio, resolved on December 21, 2025 and subsequently approved by the shareholders' meeting on January 28, 2026, became effective.

On the same date, **six directors**, equal to 67% of the total, were qualified as **independent** pursuant to Article 148 of the Consolidated Law on Finance and the Corporate Governance Code.

The Group promotes balanced and pluralistic governance, favoring the presence of the underrepresented gender on the Board of Directors. In 2025, **female representation amounted to 44%** (four out of nine Directors), in line with the provisions of Article 9.1 of the Articles of Association, which establishes a threshold of at least two fifths of the total.

The composition of the Board ensures adequate heterogeneity in terms of age, professional background, language skills and sectoral and international experience. The experiences of the Directors, consistent with the Group's business sector and with the

geographical contexts in which it operates, are attributable to macro-functional areas of the business model, governance needs, and the main risk and opportunity profiles.

Composition and responsibilities of the Board of Directors

	Independence	Age	Languages	Digital TLC Technology	Finance (M&A) Risk Audits	Corporate Governance Legal	Experience in sectors other than FTA	International experience
Domitilla Benigni²	YES	50-60	IT-EN	X				X
Paola Camagni	YES	50-60	IT-EN-FR		X			X
Federico Ferro Luzzi	YES	50-60	IT-EN		X	X		X
Alberta Figari	YES	>60	IT-EN		X	X		X
Paola Giannotti De Ponti	YES	>60	IT-EN-FR-ES		X	X	X	X
Giovanni Gorno Tempini	NO	>60	IT-EN		X	X		X
Pietro Labriola	NO	50-60	IT-EN-PT	X				X
Umberto Paolucci³	YES	>60	IT-EN	X			X	X
Stefano Siragusa⁴	YES	50-60	IT-EN	X	X		X	X
Alessandra Perrazzelli⁵	YES	>60	IT-EN-FR	X	X	X	X	X

In this context, the Board ensures adequate oversight of relevant competencies, including those in the field of sustainability.

With reference to ESG competences, the Board of Directors ensures their availability both directly, through the composition and complementarity of the profiles of the directors, and indirectly, using the support of the competent corporate functions, including the Corporate Communication & Sustainability Department, as well as, where necessary, specialized contributions. This support is also made available to the members of the Board of Statutory Auditors.

Within the Board of Directors, **ESG competences** are particularly **concentrated in five Directors** (Figari, Gorno Tempini, Labriola, Perrazzelli and Siragusa), who bring specific experience and expertise gained, among other things, in the following areas:

- governance and operation of board committees with responsibility for sustainability;
- integration of ESG factors into the strategies of companies and institutions;
- ESG regulation and compliance profiles;
- environmental sustainability and assessment of the environmental impacts of activities and infrastructure;
- innovation and digital transformation to support sustainability objectives.

The ESG competences of the Board of Directors allow effective supervision and the integration of sustainability issues into the business strategy, with a focus on climate risks related to infrastructure management, information security and data protection risks, as well as compliance risks deriving from regulatory evolution.

The Board of Statutory Auditors, renewed by the shareholders' meeting of April 23, 2024, is composed of **five statutory auditors**, including the Chairman, and four alternate auditors, pursuant to Article 17 of the Articles of Association. As of December 31, 2025, the composition is unchanged.

In 2025, the representation of women in the Board of Statutory Auditors was 40%: of the five statutory auditors, three are male and two are female; of the four alternate statutory auditors, two are male and two are female.

The Board periodically evaluates the professionalism requirements of its members and, in 2025, the self-assessment confirmed a balanced and diverse structure in terms of professional skills and training courses.

Composition and responsibilities of the Board of Statutory Auditors

	Age	Languages	Digital TLC Technology	Finance (M&A) Risk Audit	Corporate Governance Legal	Experience in sectors other than FTA	International experience
Francesco Fallacara	>60	IT-EN		X	X		X
Anna Doro	>60	IT-EN		X	X		X
Massimo Gambini	>60	IT-EN		X	X		X
Mara Vanzetta	50-60	IT-EN		X	X		X
Francesco Schiavone Panni	>60	IT-EN		X	X		X

Any form of discrimination based, inter alia, on ethnicity, nationality, country of origin, sex, sexual orientation, religion, political opinion or other personal conditions is excluded in the election of Directors and members of the Board of Statutory Auditors.

The Group does not provide for trade union representation within the administrative, management and supervisory bodies.

² Resigned on September 25, 2025.

³ Resigned effective January 1, 2026.

⁴ Qualified as independent pursuant to Article 148 of the Consolidated Law on Finance until 12/31/2025. Since January 1, 2026, it has also been independent pursuant to the Corporate Governance Code.

⁵ Co-opted on September 25, 2025 and subsequently appointed by the shareholders' meeting of January 28, 2026.

Functions of the Board of Directors and internal board committees

The Board of Directors of the parent company TIM exercises strategic guidance and supervision functions, pursuing the creation of value in the medium to long term and taking into account the interests of stakeholders, with a view to the sustainability of the company.

Within the scope of its responsibilities, the Board:

- defines and approves the Group's strategic, industrial, financial and sustainability plans, and periodically monitors their implementation;
- evaluates the corporate and financial performance of the Group and the main subsidiaries, based on the information provided by the CEO, verifying the consistency of the results achieved with respect to the planned objectives;
- periodically assesses, with the support of the Sustainability Committee, the progress with respect to the objectives of the Sustainability Plan and the possible need for corrective actions;
- ensures compliance with the ethical and social responsibility principles enshrined in the Group's code of ethics and conduct, monitors compliance with applicable regulations and approves the Group's code of ethics and conduct as well as the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, appointing the members of the Supervisory Body, having heard the opinion of the Control and Risk Committee and the Board of Statutory Auditors;
- defines the guidelines of the Internal Control and Risk Management System (SCIGR) and periodically verifies its adequacy and proper functioning, ensuring that the main corporate risks are identified, monitored, and managed appropriately;
- approves, at least once a year and after consulting the Control and Risk Committee, the Plans of the Compliance and Audits Departments;
- ensures the transparency of financial and non-financial communications to the market and investors.

In the exercise of its functions, the Board is supported by **four board committees** with advisory, propositional, investigative and monitoring functions: the **Control and Risk Committee**, the **Appointments and Remuneration Committee**, the **Related Parties Committee** and the **Sustainability Committee**, each governed by a specific regulation.

The Sustainability Committee, established in April 2021 and chaired by the Chairwoman of the Board of Directors, supports the Board in overseeing environmental, social and governance (ESG) issues. In this context, it interacts with the Nomination and Remuneration Committee for the integration of ESG objectives into the remuneration policy and with the Control and Risk Committee in relation to the double materiality analysis and Sustainability Reporting.

In confirmation of the Company's commitment to ESG issues, the Board of Directors of May 29, 2024 amended the Principles of Self-Regulation by providing for the inclusion of the CEO in the Sustainability Committee; The participation of the Corporate Communication & Sustainability Department in Committee meetings is also ensured.

The integration of sustainability practices into business operations is entrusted to the Corporate Communication & Sustainability Department, reporting directly to the CEO. Within this structure, the Sustainability function, in collaboration with the relevant corporate departments, coordinates the Group ESG Plan and its targets, social and environmental sustainability initiatives, the preparation of sustainability reporting, and the monitoring of sustainability indices and ratings.

The Board of Statutory Auditors exchanges relevant information with the Control and Risk Committee and with the Sustainability Committee, with particular reference to the process of preparing the sustainability reporting, ensuring that it is drawn up in accordance with the regulatory framework and applicable standards. The Chairman of the Board of Statutory Auditors, or an appointed Statutory Auditor, participates in the work of the board committees, without prejudice to the right of the other Statutory Auditors to participate in the meetings.

In Brazil, TIM S.A. has its own governance structure, consisting of a Board of Directors supported by four committees (Audits, Remuneration, Control and Risks, and ESG), as well as a Tax Board and a Management Board. Sustainability issues are overseen by the Regulation, Institutions, Public Relations & Sustainability Department and, at a strategic level, by the ESG Committee, which reports periodically to the Board of Directors.

Internal control system and risk management system

The Internal Control and Risk Management System (SCIGR) regulates the ways in which impacts, risks and opportunities are monitored and supervised at Group level, ensuring the supervision of the processes of identification, evaluation, monitoring and management of the same by the management, administration and control bodies, each according to their own responsibilities.

The SCIGR is a fundamental element of the Group's governance structure and consists of rules, procedures and organizational structures aimed at ensuring a healthy and consistent management of the main corporate risks, including ESG risks, in line with the Group's strategic objectives, "the Code of Ethics and Conduct" and the "Principles of Self-Regulation". The system is applied at Group level, taking into account the operational specificities of the individual companies.

With reference to the operational structure of the system, the SCIGR is divided into **three levels of control**:

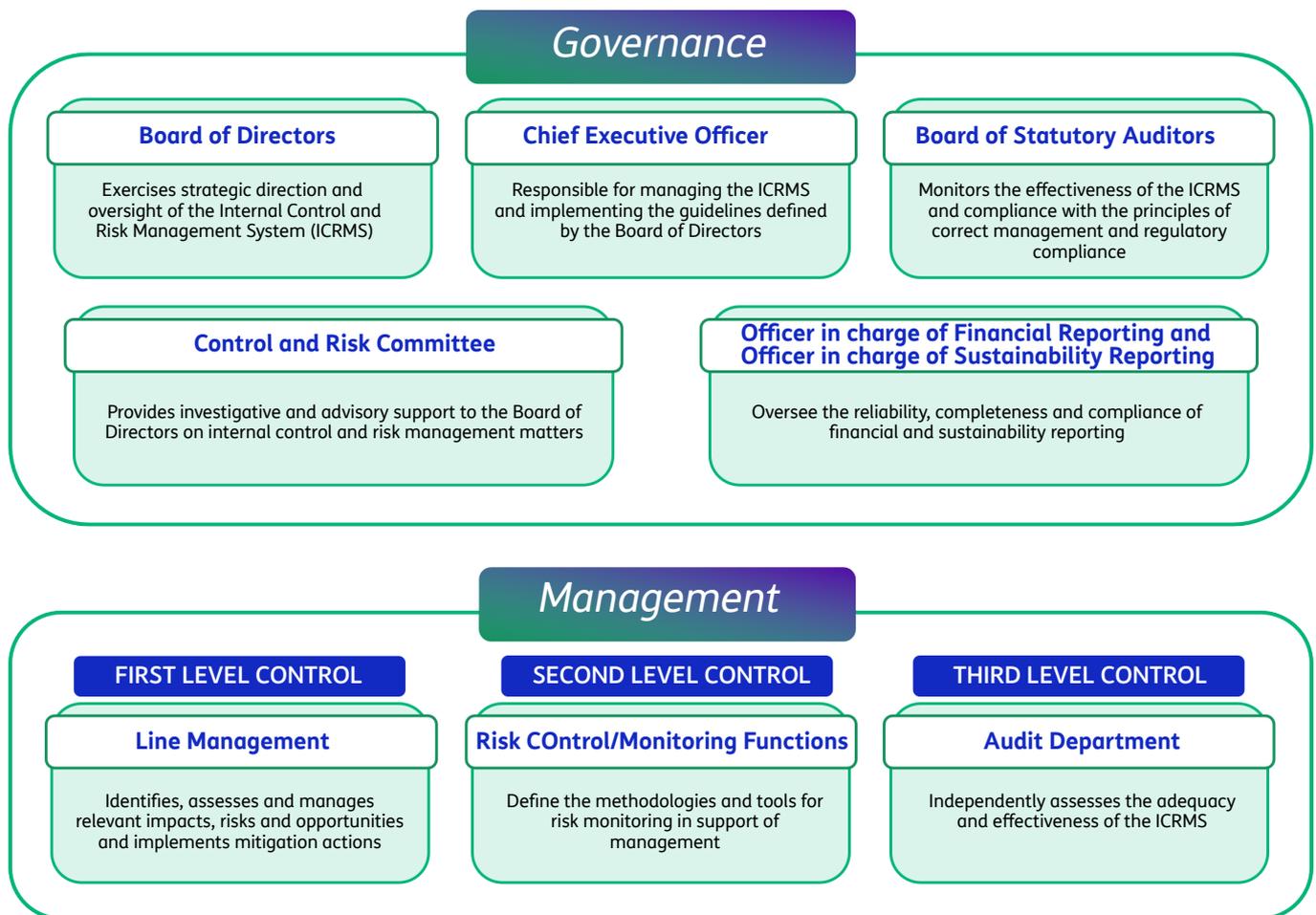
- **the first level**, entrusted to management, responsible for the identification, evaluation, and management of impacts, risks, and opportunities within its competence, as well as the definition and implementation of mitigation actions; in the ESG field, the Sustainability function identifies and assesses the extent of material sustainability impacts, risks and opportunities together with the Risk Management, Compliance and Finance functions;
- **the second level**, represented by the Financial Reporting Manager, the Sustainability Reporting Manager, the Data Protection Officer, and the Enterprise Risk Management, Health & Safety, Compliance and Tax Office, and other control functions, which define the measurement and monitoring methodologies and support management in risk assessment and mitigation;
- **the third level**, carried out by the Audit Department, which independently evaluates the adequacy and effectiveness of the design and overall functioning of the Internal Control System, also through verification activities on the first and second level.

The Governance and supervision of the SCIGR are entrusted to the Board of Directors which:

- verifies the appropriateness, effectiveness and proper functioning of the SCIGR, ensuring that the main business risks, including those related to material topics, are correctly identified, monitored and managed over time. To this end, the Board evaluates the adequacy and effectiveness of the SCIGR every six months, also on the basis of the results of the audits carried out by the Audit Department and the contributions of the other control functions, and defines the acceptable level of risk in line with the long-term strategic objectives (Risk Appetite);
- establishes the Control and Risk Committee, with the support of which it carries out the assessments and takes the decisions relating to the SCIGR, as well as the other board committees with advisory, propositional or investigative functions, governed by the Principles of Self-Regulation and their respective regulations.

Management of the SCIGR is entrusted to the Chief Executive Officer, the Financial Reporting Officer and the Sustainability Officer, each within their respective areas of responsibility, to ensure the adequacy and functionality of the System from a risk-based perspective. In September 2022, TIM's Board of Directors created the **SCIGR Steering Committee**, headed by the CEO, to identify, define, and monitor initiatives to improve the company's Internal Control and Risk Management System, based on an integrated analysis of the activities carried out by the control functions and other corporate functions. On September 27, 2023, the TIM Board of Directors approved, after the opinion of the Control and Risks Committee, the "Guidelines of the TIM Group's Internal Control and Risk Management System" ("SCIGR Guidelines") that define the architecture of the SCIGR, the main corporate roles and responsibilities in the field of SCIGR, the coordination methods and information flows between the parties involved, the periodic evaluation process of TIM's SCIGR. The Board of Statutory Auditors plays a key role in ensuring the effectiveness of the SCIGR, in line with the Corporate Governance Code. It receives information necessary to carry out its supervisory duties, including Audit Reports and periodic reports from the Audit Department, and has the authority to request the Audit Department to prepare timely reports on events of special significance.

Operational, management and governance structure of the SCIGR



Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the company’s administrative, management and supervisory bodies

[26 a, b, c]

The management and supervision of the issues material to the Group are based on a structured system of information flows and processes involving the Board of Directors, the board committees and the control bodies.

The Board of Directors is periodically informed about the material impacts, risks, and opportunities, including those of an environmental, social, and governance (ESG) nature, as well as about the actions and policies adopted for their management. This disclosure is also provided through the board committees, in particular the Control and Risk Committee and the Sustainability Committee, which operate on the basis of an agenda defined annually.

The Board of Statutory Auditors is also involved in these information flows, having access to all the documentation and information necessary for the performance of its control functions and participating in the work of the board committees.

With reference to sustainability issues, the outcome of the double materiality analysis process, which identifies the material ESG impacts, risks and opportunities and forms the basis of the Sustainability Reporting, is presented annually by the Corporate Communication & Sustainability Department in joint session to the Control and Risk Committee, the Sustainability Committee and the Board of Statutory Auditors, and subsequently to the Board of Directors.

The TIM Group's administrative, management and control bodies use the Enterprise Risk Management (ERM) process to identify, assess, quantify and monitor significant risks for the Company, including those related to ESG issues. The ERM process is continuous and involves all the competent company functions (Risk Owners), who participate in periodic Risk Assessment activities aimed at updating risk profiles, including emerging ones.

The Enterprise Risk Management process includes the following main activities:

- identification and updating of the overall risk portfolio in collaboration with the Risk Owners through analysis of the Business Plan and investment projects, monitoring of the macroeconomic and regulatory environment, and analysis of the risks to which business assets may be exposed;
- quantitative assessment of risks, both at the level of individual risk and from a portfolio perspective, taking into account possible correlations;
- support to management in defining risk appetite and the related Tolerances, preliminarily validated by the Control and Risk Committee and subsequently approved by the Board of Directors;
- definition and monitoring of risk mitigation plans, with periodic updates to the Control and Risk Committee on the level of risk detected with respect to the approved Tolerances and subsequent submission to the Board of Directors;
- management of the information flow to top management and control bodies, through the preparation of periodic reports or on request, to support the evaluation activities of the SCIGR;
- management of the ERM steering committee, aimed at monitoring the status of Tolerances and coordinating Risk Owners in the timely adoption of any corrective actions.
- The risk management model adopts an integrated approach that also considers sustainability issues, including economic, environmental, social, and governance risks relevant to stakeholders, in line with the double materiality analysis.

The impacts identified through this analysis are integrated into business strategies, decision-making processes and the Enterprise Risk Management system, ensuring that strategic decisions are informed by a comprehensive view of potential impacts, risks and opportunities.

For a detailed description of the processes for identifying and assessing material impacts, risks, and opportunities from an ESG perspective, please refer to disclosure requirements IRO-1 "Description of the process for identifying and assessing material impacts, risks, and opportunities", E1 IRO-1 "Description of processes for identifying and assessing material climate-related impacts, risks, and opportunities", and E5 IRO-1 "Material impacts, risks, and opportunities – Resource use and circular economy".

The list of material impacts, risks, and opportunities addressed by the administration, management and control bodies, or by their respective committees, during the reference period is provided in disclosure requirement ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and the business model", in this section.

Remuneration system

Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes

[29 a, b, c, d, e]; [E1 GOV-3 13]

The Remuneration Policy of the TIM Group is aimed at supporting the achievement of the Company's strategic objectives, while ensuring competitiveness in the labor market and the alignment of management interests with the creation of value in the short and long term. The Policy, approved by the Shareholders' Meeting on June 24, 2025, provides for a balanced equilibrium between economic-financial, stock performance, and ESG parameters, in line with the three-year Business Plan, integrating ESG issues, including those related to climate change, in a structured way into the incentive systems.

In implementation of the Remuneration Policy, the Report on the Remuneration policy and compensation paid is approved by the Board of Directors, upon the proposal of the Nomination and Remuneration Committee; with reference to aspects of the ESG component, the Sustainability Committee is involved in the process of defining and evaluating the related objectives.

The Remuneration Policy, for 2025, provides for: **a short-term variable remuneration** structured as follows:

- a **gate objective** of an economic-financial nature, consisting of the company indicator "TIM Group EBITDA After Lease", whose achievement at the minimum level is a necessary condition for access to the premium for all functions except those reporting to the Board of Directors (audits and Compliance), for which there is no provision. The weight and minimum threshold of the objective are differentiated by population cluster, with a gate percentage of 95% for the CEO and the Front Line and 90% for the Other Management;
- a uniform **pay-out scale** for all recipients, based on a linear interpolation mechanism between the minimum (50%), target (100%), and maximum (150%) levels of each objective, measured individually;
- **function objectives**, with a differentiated weight depending on the recipients' basins;
- **ESG objectives**, with a total **weight of 22%**, divided into the following areas:
 - **Environment**: number of **Data Centers certified according to the European Taxonomy** (Italy), aimed at promoting the improvement of the operational efficiency of Data Centers, also in terms of reducing environmental impacts and efficient use of natural resources;
 - **Social**: percentage of **female hires** out of total hires (Group);
 - **Governance**: percentage of **detractors** detected in the fourth quarter 2025 (Domestic BU).

The **long-term variable remuneration** provides for a 2025-2027 Performance Share LTI Plan, addressed to the CEO, top management, and a select number of managers with key roles. The recipients of the Plan are divided into three pay opportunity groups, determined according to the contribution to the company's strategic objectives. For each band, the number of rights to receive shares, attributed to the target, is defined.

The Plan provides for:

- **two economic-financial performance indicators**:
 - **"EBITDA – CapEx"** accumulated in the three-year period (reported values) with a **weight of 50%**, represented;
 - **"Total Shareholder Return"** with a **weight of 20%**, which measures the total return for shareholders, taking into account the trend of the share price and the dividends distributed. The indicator is assessed over a three-year time horizon and reflects the Company's ability to generate shareholder value over the medium to long term.
- **two ESG indicators**, with a total **weight of 30%**, broken down into the following areas:
 - **Environment**: **eco-efficiency of the mobile network** aimed at encouraging the improvement of the energy efficiency of the network and contributing to the reduction of consumption and emissions, with a weight of 15% (Domestic BU);
 - **Social**: percentage of **women in formalized positions of responsibility** in the company organization, with a weight of 15% (Domestic BU).

The variable component of remuneration in shares is linked to the achievement of specific performance objectives. The number of shares assigned depends on the level of achievement of the objectives, according to a payout curve that provides for the recognition of 50%, 75%, or 100% of the incentive, with proportional determination in the case of intermediate results.

The mechanism ensures a direct and transparent connection between the results achieved and the variable remuneration. Climate issues are integrated into the long-term variable component through the Environment objective of the Performance Shares 2025-2027 LTI Plan, with a weight of 15%, applied to the CEO and Managers with Strategic Responsibilities.

Disclosure Requirement GOV-4 – Statement on due diligence

[30]; [32]

The TIM Group identifies, assesses, and manages the actual and potential negative impacts of its activities on people and the environment, as well as the main sustainability risks and opportunities related to the TIM Group's activities and the value chain, through structured business processes integrated into governance and control systems.

All these processes, defined as a due diligence, are used to support company decisions, define prevention, mitigation or remedy actions, and monitor their effectiveness over time, ensuring the traceability of the ways in which sustainability impacts and risks are identified and addressed.

The **due diligence** is divided into the following **operational phases**:

- integration into governance and decision-making processes: sustainability impacts, risks and opportunities are considered in the Group's governance systems, planning processes and control measures;
- stakeholder engagement: TIM involves the main stakeholders to collect useful information for the identification and assessment of negative impacts and sustainability risks related to the Group's activities and the value chain;
- identification and assessment of impacts, risks and opportunities: TIM analyzes the actual and potential negative impacts and sustainability risks and opportunities, taking into account the severity of the effects, the likelihood of occurrence, and the level of exposure of the Group;
- prevention, mitigation and remedy actions: Based on the assessments, TIM defines and implements measures to prevent or mitigate the identified negative impacts and risks or, where necessary, to remedy the actual impacts;
- monitoring and reporting: the effectiveness of the actions taken is monitored over time and the results are communicated through the Sustainability Reporting.

The following table indicates, for each phase of the process, the paragraphs of the Sustainability Reporting in which these aspects are described.

Statement on due diligence

Main aspects of due diligence	Reference Paragraphs of the Sustainability Report
Embedding of due diligence in governance, strategy, and the business model	<ul style="list-style-type: none"> • GOV-2 • GOV-3 • SBM-3 (including requirements in ESRS E1-S1-S2-S3-S4)
Stakeholder Engagement	<ul style="list-style-type: none"> • ESRS 2 MDR-P • GOV-2 • SBM-2 • IRO-1 (including the requirements set out in ESRS E1-S1-S2-S3-S4)
Identification and assessment of impacts and risks	<ul style="list-style-type: none"> • IRO-1 (including the requirements set out in ESRS E1-S1-S2-S3-S4) • SBM-3 (including requirements in ESRS E1-S1-S2-S3-S4)
Interventions to prevent, mitigate or remedy negative impacts and risks	<ul style="list-style-type: none"> • ESRS 2 MDR-A • E1-3 • E5-2 • S1-4 • S2-4 • S3-4 • S4-4
Monitoring and communication of the effectiveness of the actions taken	<ul style="list-style-type: none"> • MDR-T

Control system

Disclosure Requirement GOV-5 – Risk management and internal controls over sustainability reporting

Responsibility and structure of the control system over sustainability reporting

[36 a, b, c, d]

Sustainability reporting is supported by a dedicated risk management and internal control system, aimed at ensuring its completeness, accuracy, and compliance with applicable standards.

In this context, **TIM introduced the figure of the Sustainability Reporting Manager**, in accordance with the provisions of the Corporate Sustainability Reporting Directive, who certifies, together with the CEO, the accuracy, reliability, and compliance with standards of the information contained in the Sustainability Reporting.

On December 11, 2024, the Board of Directors appointed the Head of the Corporate Communication & Sustainability Department, Maria Enrica Danese, as the Sustainability Reporting Manager. The appointment was also confirmed in 2025 in the Board of Directors of November 11 of the same year.

To oversee the certification process and to support the responsibilities attributed to the Sustainability Reporting Manager, in 2024 **TIM also introduced an Internal Control System on Sustainability Reporting (SCIRS)**. The Model is developed in line with the main risks on corporate disclosure, also used in the Financial Disclosure Control Model, and reflects the company's attention to corporate governance, risk management, the responsibilities of the internal control system and the attribution of powers and responsibilities.

The Model is inspired by the framework of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the guide "Achieving Effective Internal Control of Sustainability Reporting (SCSR)" published in March 2023 and is in line with the COSO Framework, divided into 17 fundamental principles grouped into five components of the internal control system: Control Environment, Risk Assessment, Control Activities, Information System and Monitoring Activities, which are interconnected and integrated into the Group's management processes.

The SCIRS Model is aimed at ensuring the reliability and accuracy of Sustainability Reporting and is based on a risk-based approach, which involves the identification, evaluation, and prioritization of the risks associated with sustainability disclosure, in order to define the most appropriate perimeter of analysis and controls. To this end, TIM has adopted a procedure dedicated to regulating the "Certification process on the Internal Control System on Sustainability Reporting pursuant to Legislative Decree no. 125 of 2024", which identifies the methodological references, criteria, perimeter and responsibilities of the SCIRS Model, and defines the controls associated with the risks on the sustainability disclosure for the datapoints within the perimeter.

The SCIRS Model is divided into the following **phases**:

- definition of the scope of analysis based on the assessment of risk and relevance;
- execution of controls at entity level (Entity Level Controls – ELC), transversal to the organization or referring to individual Group Companies;
- execution of general controls on information technology systems (Information Technology General Controls – ITGC);
- execution of process level controls (PLC);
- carrying out tests by management, issuing certifications by sign-off, and signing letters of attestation;
- independent audits by the Compliance Department;
- assessment of control deficiencies and definition of remediation plans and their management;
- final certificate and disclosure to the Administrative and Supervisory Bodies.

In application of the Model, a risk and materiality analysis was conducted that considered internal and external factors and covered all the datapoints and companies included in the scope of consolidation of the Sustainability Reporting.

For the purpose of prioritizing the datapoints subject to control, the SCIRS Model uses specific drivers of relevance, which are assigned a homogeneous weight and a predefined score. These drivers include:

- the complexity of the database and/or calculation methodology;
- the potential reputational and/or material impact resulting from any misstatement;
- the centrality of the datapoint with respect to the Company's sustainability plan and sustainability targets;
- the materiality of the datapoint for the purposes of the assessments by the rating agencies;
- the priority of the topic emerged as a result of the double materiality analysis.

Based on the analysis conducted and the prioritization of the datapoints, the main risks associated with sustainability disclosure have been identified, which concern in particular the incomplete or inaccurate collection of data, calculation errors, aggregation or consolidation, the incorrect imputation of data in information systems and in the ESG platform, as well as the inconsistent preparation of the reporting document with respect to the requirements of the ESRS.

In order to mitigate the risks identified, the SCIRS Model provides for the definition of control objectives and the implementation of structured controls, aimed at ensuring the completeness, accuracy, consistency, and traceability of sustainability information. Operational controls are built at the Company level (Entity Level Controls), at the process level (Process Level Controls) or are general on information systems (IT General Controls), with responsibilities assigned and formalized.

The evaluation of the design of the controls and their adequacy with respect to the identified risks involves the following operational **phases**:

- identification of control responsibilities;
- analysis of the risks of non-conformity of the control with respect to the qualitative characteristics provided for by the ESRS;
- verification of the coverage of the control objectives through the execution of tests;
- identification of any areas for improvement and definition of corrective actions.

The Model also provides for a process of periodic monitoring of the adequacy and operation of controls, based on self-assessment and testing activities carried out by the responsible company functions and on independent checks by the Compliance Department. The results of the risk assessment and controls are taken into account to update the design and strengthen the risk mitigation measures on the sustainability disclosure.

If the ineffectiveness of a control emerges, the results are formalized by opening a control deficiency and defining a remedy plan, the implementation of which is monitored.

The results of risk assessment activities and internal controls are reported periodically to the Administrative and Supervisory Bodies. In particular, the Sustainability Reporting Manager and the Compliance Department inform the Board of Statutory Auditors, the Control and Risk Committee and the Sustainability Committee about the status of the controls, the results of the tests, the deficiencies found and the progress of the related remediation plans, coordinating with the Executive Responsible for preparing the corporate accounting documents.

In view of the nature of parent company and the consequent need to proceed, in accordance with applicable legislation, with the preparation of the Consolidated Sustainability Report and the issuance of the related certificates referred to in Article 154-bis of the TUF, a process has been defined to ensure the coordination of information flows to the parent company TIM. This coordination is based on internal certifications issued by the subjects involved in different ways in the business processes, both by the department managers and by the directors of the subsidiaries falling within the scope of certification.

ESG strategy

Disclosure Requirement SBM-1 Strategy, business model and value chain

[40 a i, ii, iii, iv]; [40 e, f, g]; [42 a, b, c]

Business model and value generation

The TIM Group is a leader in the telecommunications and digital infrastructure sector and is the **main infrastructure operator in Italy**. Its activities include the development and management of fixed and mobile networks, Data Centers, communication services and digital solutions for retail customers, businesses and the Public Administration.

In the international segment, the subsidiary Sparkle operates a global optical fiber network among the most extensive in the world, offering high quality data, voice and video transmission services. **In Brazil, TIM S.A. is one of the leading operators in the telecommunications market** and stands out for its leadership in 4G and 5G coverage.

As of December 31, 2025, the Group had 26,177 employees, mainly located in Italy (17,231)⁶ and Brazil (8,702)⁷.

The Group's business model combines the development of digital infrastructures with the provision of innovative services, integrating technological innovation and sustainability in order to generate long-term value and contribute to the reduction of

⁶ Included in "Italy" are: TIM S.p.A., Telecom Italia Sparkle S.p.A., Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l, TI Trust Technologies S.r.l., QTI S.r.l., Mindicity S.r.l.

⁷ In Brazil only TIM S.A. is considered.

environmental impacts. The Group does not offer prohibited products and services in the markets in which it operates, in accordance with applicable regulations.

In the Consumer segment, TIM offers individuals and households a wide range of fixed and mobile telephony services, with solutions dedicated to connectivity, digital content and entertainment, while supporting small and medium-sized businesses in their digitization journey with dedicated services and offers.

In the Small Business segment, TIM targets professionals, micro-enterprises and SMEs with an integrated portfolio of fixed and mobile connectivity services, cloud solutions and digital communication tools, accompanying companies in digitization processes through dedicated offers and value-added services.

In the Business segment, TIM Enterprise acts as a strategic partner for companies and Public Administration, providing end-to-end solutions in the cloud, internet of things (IoT), and cybersecurity sectors. These services, delivered through a nationwide network of data centers, leverage the expertise of Group companies, including **Noovle, Olivetti, Telsy, and TI Trust Technologies**, and benefit from collaborations with internationally renowned technology partners.

Within the Group, some companies have adopted the status of **Benefit Corporation**, incorporating common benefit purposes into their corporate objectives alongside economic goals. In particular:

- **Noovle**, specialized in Cloud and Edge computing solutions, became a Benefit Corporation in July 2021 and operates data centers certified according to international standards of security and energy efficiency;
- **Olivetti**, focused on IoT and Big Data solutions, adopted Benefit Corporation status in January 2023, promoting sustainable digitalization;
- **Mindicity**, acquired by Olivetti in 2022, contributes to the development of solutions for local administrations in the smart city field.

Through these activities, TIM positions itself as a key player in technological innovation in Italy and Brazil, contributing to the responsible development of the economy and society.

The Group also promotes high social impact initiatives through TIM Foundation in Italy and TIM Institute in Brazil, in supporting community development and digital inclusion.

With regard to the value creation model, reference is made to the section “Essential Intangible Resources” in the TIM Group’s Management Report.

Sustainability strategy and drivers

In defining its industrial strategy, the TIM Group integrates in a structured way the environmental, social and governance dimensions into the business model, taking into account the material impacts, risks and opportunities in terms of sustainability, in line with the evolution of the regulatory, market and technological context.

On the environmental front, the impacts related to infrastructure activities and energy consumption are significant, as well as climate and transition risks and opportunities related to technological innovation, process efficiency, and progressive decarbonization.

On the social front, both the impacts on the workforce — with reference to the evolution of organizational models, the development of skills and the enhancement of merit — and the opportunities and impacts related to the growing demand for digitization by customers, businesses and the Public Administration are relevant, with effects on the inclusion and development of territories.

On the governance front, they highlight the risks associated with regulatory compliance, ethical and responsible management of the business, and the protection of stakeholders, as well as the opportunities deriving from the strengthening of control measures and transparency, as enabling elements for the stability and reliability of the business model.

In response to the impacts, risks and opportunities mentioned above, the Group sets out its sustainability strategy in the following priority drivers:

- **reduce the environmental impact of digital infrastructures** (5G, fiber, data centers), improving energy efficiency, strengthening emissions monitoring and implementing a long-term transition plan towards progressive decarbonization and efficient use of resources, including through the involvement of the supply chain and the tracking of related emissions;
- **accelerate the digital and environmental transition of companies and Public Administration**, through digital services and platforms aimed at the efficiency of processes and services, favoring their dissemination and scalability among central and local administrations;
- **strengthen the security and resilience of infrastructures and services, internal and for customers**, through sovereign cloud models and advanced digital solutions that guarantee data control, operational continuity, and technological autonomy;
- **enhance skills and merit** as a lever for growth, promoting the reduction of the gender gap and investing in structured upskilling and reskilling programs, with particular attention to AI skills.

The circular economy model (reuse/regeneration) **permeates across the Group's operational processes** to reduce the Company's environmental impact.

The new strategic plan and its sustainability targets, referring to the period 2026-2028, are currently being defined and will be formalized on the occasion of the presentation of the next business plan, scheduled for 2026. However, the Group confirms the strategic guidelines and the integration of sustainability into the business model and the Business Plan, which has been an integral part of it for years.

ESG Results 2025

With reference to the objectives of the 2025–2027 Business Plan, currently being updated, the results achieved in 2025 are shown below, with evidence of the targets due in the year.



On the environmental side, the **Group has achieved 100% procurement of electricity from renewable sources**, resulting in zero Scope 2 emissions (Market Based approach); the result constitutes the final result of the target with maturity in 2025. The Group confirms its commitment to maintain a supply from renewable sources in the coming years, evaluating, where possible, an increase in the self-production share.

On the social side, the target for the **presence of women in positions of responsibility** registers a value of **33.5%** in 2025, down slightly compared to 33.8% in 2024, while remaining consistent with the medium-long term trajectory.

With reference to the "hiring" target, 2025 ended with an **incidence of women among Group hires of 52.8%**, anticipating the achievement of the target set in the Plan (50% by 2027). The result was achieved even in the presence of a market characterized by a prevalence of male applications in technological and commercial profiles; on this front too, TIM confirms its commitment to maintaining a 50% share of female hires in the coming years.

Regarding digitization issues in the Domestic market, **service revenues from IoT, cloud and cybersecurity grew by 22%** compared to 2024, exceeding the expected target (+17% compared to 2024), also thanks to the contribution of TIM Enterprise and the factories Olivetti, Noovle and Telsy. The result reflects a solid performance both in the cloud (+24%), supported by TIM's multi cloud positioning and the growing demand from Public Administration, and in IoT solutions (+27%), which reflect the Company's role as an enabler in the development of integrated solutions with AI, Big Data and 5G connectivity.

Regarding the growth of **digital services (PEC, SPID and Digital Signature)**, measured as a percentage increase in active services compared to the base year 2023, in 2025 there is a **growth of 34%**, above the 30% target set by the Plan; the figure represents the final figure of the target with maturity in the year. The growth is almost entirely attributable to the Digital Signature, which represents 97% of the total services, aimed at signing digital documents with legal value and at the efficiency of administrative processes

For TIM S.A., the Plan included a target related to training on Artificial Intelligence, involving 90% of employees by 2027. In 2025, the percentage of employees who completed the dedicated training courses stood at 60%, in line with the path of progressive achievement of the target.

Overall, 2025 confirms a strengthening of the Group's ESG profile, not only in terms of achieving the targets, but also of consolidating the structural safeguards.

During the year, **11 data centers were certified according to the EU Code of Conduct** on energy efficiency and the parent company obtained ISO 14064 certification on greenhouse gases.

On the social front, the strengthening of the gender balance in leadership roles continued and a training program on Artificial Intelligence was launched for the entire corporate population in Italy and Brazil.

On the market side, **TIM Enterprise has developed the plan of services and platforms to support the digital transition of the Public Administration, with 23 projects already underway.**

Finally, the Group's ESG positioning is confirmed by its inclusion in the main international indices and ratings, including the inclusion of **TIM Italia in the S&P Global Sustainability Yearbook 2026** (Industry Distinction – Top 10%) and the performance of **TIM Brasil in the "A List" of the CDP Climate**.

Integration of sustainability in the offering

In line with the decarbonization strategy and with the integration of sustainability into the business model, the Group progressively orients its offer towards solutions that reduce the environmental impact throughout the life cycle of products and favor more responsible consumption models, through the application of circular economy principles aimed at promoting the reuse, regeneration, and recovery of devices.

Below are some representative initiatives of this approach.

In Domestic, the evolution of the offer towards more responsible consumption models mainly translates into broadband offers that use TIM-branded devices accompanied by environmental product certifications (EPD); in the use of recycled materials for physical sims and for product packaging; in the progressive diffusion of e-sims as an alternative to physical sims, in order to reduce the use of plastic materials; in trade-in programs aimed at the reuse of devices and reducing electronic waste; in the use of regenerated products for technical assistance activities.

In Brazil, TIM S.A. adopts similar circular models through trade-in programs for mobile devices and structured initiatives for recovery, regeneration and reintroduction into the operating cycle of obsolete equipment returned by customers, as well as through collection and correct treatment of WEEE, in accordance with current environmental legislation.

The operating methods, the volumes managed and the quantitative results related to these initiatives are described in paragraph E1-3 "Actions and resources related to climate change policies" of the chapter "ESRS E1 climate change" of the section "Environmental information", in which the related environmental actions are illustrated.

Stakeholder Engagement and double materiality analysis

Disclosure Requirement SBM-2 – Interests and views of stakeholders

[45 a i, ii, iii, iv, v]; [45 b]; [45 c, i, ii, iii]; [45 d]

The TIM Group maintains a structured **dialogue with its stakeholders, through channels differentiated** according to the different reference categories.

The involvement concerns both the operational activities and the planning processes and allows to collect useful elements for the management of the issues relevant to the Group, including the assessment of the impacts, risks and opportunities related to its activities.

Engagement policies and strategies cover both direct activities and the value chain and are managed by the Corporate Communication & Sustainability Department, under the supervision of the Sustainability Committee and the Board of Directors.

The identification of stakeholders is based on the analysis of business processes and the identification of stakeholders, including any vulnerable groups. The stakeholders are subsequently grouped into homogeneous categories and prioritized according to the relevance of the impacts, risks and opportunities. Eight categories have been identified: TIM people (including trade unions); Customers, Suppliers; Business communities (including peers, over-the-top operators and industry associations); Bodies and institutions (including public administrations and national and international institutions); Financial community (including shareholders and banks); Civil Society (including consumer associations); Media (including main opinion makers).

For each category, specific engagement channels and tools are defined, consistent with the nature of the relationship and the objectives of the comparison.

Main channels of engagement of the Group's stakeholders

Stakeholders	Main Engagement Channels
TIM people (includes trade unions)	<ul style="list-style-type: none"> Domestic Intranet Platform. in 2025 <ul style="list-style-type: none"> • Approx. 20 million visits; • Approx. 760,000 news views; • 273 news stories made with 1,700 comments. Structured system of industrial relations with: <ul style="list-style-type: none"> • Trade unions and RSU, at national and territorial level; • formal information, consultation and negotiation meetings.
Customers	<ul style="list-style-type: none"> Structured customer listening plan (surveys/interviews). In 2025 approximately 3.2 million interviews in Italy Direct contact digital channels (instant messaging) Caring social channels (Facebook and X) MyTIM reserved area for reports and requests
Suppliers	<ul style="list-style-type: none"> Supplier qualification and evaluation process, including ESG criteria. In 2025, 299 new suppliers with 35% evaluated on ESG topics On-site audits within the Joint Alliance for Corporate Social Responsibility (JAC): in 2025, 4 audits
Business Community (Include peer, over the top, industry associations)	<ul style="list-style-type: none"> Participation in intraoperational working tables and groups in trade associations (ASSTEL, Anitec-Assinform) and in the Confindustria Digitale Federation Collaboration with European representative organizations in the ICT sector (Uni Europa ICT) Active membership in international industry associations and networks (GSM, Connect Europe) Participation in industry conferences and events in Italy

Stakeholders	Main Engagement Channels
Bodies and institutions (includes public administrations, national and international institutions)	Discussion tables with Ministries and Public Administrations on industrial policies, labor and simplification
	Dialogue with European institutions (European Commission, European Parliament, Council of the EU, Permanent Representation of Italy in Brussels)
Financial community (includes shareholders and banks)	Periodic financial reporting and press releases (quarterly reports and other financial disclosure)
	Quarterly earnings presentations and webinars
	Individual and group meetings with analysts and institutional investors, industry conferences and roadshows
	Dedicated engagement initiatives with institutional investors and proxy advisors (off-season and pre-meeting)
	Participation in questionnaires and surveys of ESG rating agencies
Civil society (includes consumer associations)	Participation in the Consumers' Forum
	Periodic meetings with the Consumer Associations
	Collaboration with Italian Digital Media Observatory (IDMO) for combating disinformation and digital education.
	Collaboration with Osservatorio Permanente Giovani-Editori (OPGE) on civic education and digital literacy projects
Media (including opinion makers)	Dissemination of TIM Group press releases (about 175 in 2025)

The TIM Group website represents an additional channel of engagement for all stakeholders: in 2025, approximately 7 million visits to the site were recorded.

The stakeholder engagement process in TIM⁸, integrated into the business processes, is divided into the following main **phases**:

1. Integration into governance and strategies: stakeholder involvement is considered part of decision-making processes and is consistent with strategic and sustainability objectives;
2. Identification of stakeholders: stakeholders are identified through the analysis of business processes and related stakeholders, subsequently grouped into homogeneous categories. Within each category, the priority groups are identified according to the relevance of the impacts, risks and opportunities;
3. Engagement planning: for each engagement initiative, the following are defined: objectives, scope and responsibilities; profile of the stakeholders involved; levels and methods of involvement; dedicated resources, monitoring indicators and safeguards for the risks associated with the process;
4. Engagement tools and methods: involvement takes place through diversified tools, such as individual and collective meetings, information sessions, collaborative projects, surveys and focus groups;
5. Implementation of engagement and documentation: provides for the prior information of stakeholders on the context, objectives and methods of activities, active listening during engagement initiatives, the systematic collection and documentation of results and, where relevant, the definition of action plans to support decision-making processes;
6. Monitoring, evaluation and continuous learning: engagement activities are monitored and evaluated against the defined objectives. The evidence collected and the feedback received are analyzed to identify any areas for improvement;
7. Reporting, communication and management of relations with stakeholders: The results of the engagement activities are represented in the Sustainability Reporting and, where relevant, in the governance documents. TIM also ensures the availability of channels dedicated to communication, feedback and complaints management.

The contributions collected through stakeholder engagement are used to support the decision-making process. In particular:

- as part of the double materiality analysis, the assessments expressed by stakeholders on the environmental and social impacts of TIM's activities have been integrated with management's assessments in order to identify the list of IROs material to TIM;
- the impacts, risks and opportunities identified as material are subsequently considered in the definition of strategic priorities and are consistent with the lines of action of the Business Plan;
- the attention shown to issues such as environmental protection and gender equality has led to the strengthening of specific initiatives, including actions in favor of the circular economy, the progressive introduction of the carbon footprint of TIM-branded products, and the strengthening of inclusion and shared parenting policies;
- Customer feedback, also detected through the customer satisfaction index, is used to monitor the evolution of satisfaction in relation to the development of new offers, projects, and initiatives.

Through the institutional communication and reporting channels, the Group collects the requests and expectations expressed by the stakeholders, which are evaluated by the competent functions and considered in the relevant decision-making processes. At the reporting date, no critical issues emerged such as to require the adoption of specific remedial measures; any corrective actions are assessed on a case-by-case basis according to the nature and significance of the reports received.

TIM Group's main sustainability activities and commitments, including those related to stakeholder engagement, are periodically shared with the Sustainability Committee. The outcome of the double materiality analysis process was presented by the Corporate Communication & Sustainability Department in a joint session with the Control and Risk Committee, the Sustainability Committee and the Board of Statutory Auditors on November 3, 2025, and then submitted to the Board of Directors on December 11, 2025.

⁸ Stakeholder engagement in TIM follows the guidelines of the AccountAbility 1000 standards (AA1000APS and AA1000SES).

Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

[48 a]; [48 c i, ii, iii, iv]; [48 g, h]

The double materiality analysis of the Group in 2025 highlighted **38 material IROs** divided into: **10 negative impacts, 6 positive impacts, 12 risks and 10 opportunities**. In view of the coverage of the topics addressed, the 38 IROs have been traced back to **7 ESRS topics**.

Below is the list of material impacts, risks, and opportunities (IROs), with the following details:

- IRO number: indicates the relevance attributed to the impact, risk or opportunity based on stakeholder assessments in the analysis. The same number is also used as the IRO identifier in the document references;
- description of the IRO; summary of the impact, risk or opportunity with evidence of the context, the potentially interested stakeholders, and the main effects;
- type of IRO: classification of the IRO as impact, risk or opportunity. For impacts, it is specified whether the effect is actual, i.e. already in place, or potential, i.e. that could occur in the future;
- scope of application: indicates the point in the value chain to which the impact, risk, or opportunity refers. If the IRO concerns the activities of TIM's business, the perimeter is indicated as own activities; if it concerns the supply chain, such as upstream activities; if it concerns customers, such as downstream activities;
- time horizon: indicates the time frame within which the effect of the IRO manifests itself. The horizon is divided into short term (within one year), medium term (within five years), and long term (beyond five years);
- ESRS topic and sub-topic: indicates the topics to which the IRO is referred for reporting purposes;
- disclosure obligation: indicates the reference of the document in which the topic is dealt with.

List of material IROs

IRO number	Description of IRO	Type of IRO	Scope of application	Time horizon	ESRS topic	ESRS sub-topic	Disclosure obligation
1	Vulnerabilities in computer systems can cause the loss of sensitive data, with consequences on the privacy of customers and employees and on the protection of information of companies and public administrations	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Downstream activities 	<ul style="list-style-type: none"> Short 	<ul style="list-style-type: none"> S1 Own workforce S4 Consumers and end-users 	<ul style="list-style-type: none"> S1 Other work-related rights S4 Information-related impacts for consumers and/or end-users 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4 S4-SBM-3 S4-1 S4-4
2	Failure to comply with anti-corruption rules, antitrust legislation, ethical standards and sustainability reporting obligations can result in economic sanctions, legal liabilities and operational limitations, with repercussions on competitiveness, reputation and market confidence.	Risk	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> G1 Business conduct 	<ul style="list-style-type: none"> G1 Active and passive corruption G1 Corporate culture 	<ul style="list-style-type: none"> G1-1
3	The development of strategic partnerships in areas such as cybersecurity and artificial intelligence can favor the creation of innovative offers, with economic benefits and reputational benefits.	Opportunity	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> SBM-3 S4-1 S4-4
4	Transparent reporting procedures and adequate safeguards for whistleblowers can strengthen governance, foster whistleblower confidence, and support a company culture of integrity and legality.	Positive Impact (Actual)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> G1 Business conduct 	<ul style="list-style-type: none"> G1 Whistleblower Protection 	
5	Training and development initiatives, also oriented to reskilling, can promote the development of skills, the involvement and satisfaction of employees, contributing to an inclusive and productive work environment.	Positive Impact (Actual)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Equal treatment and opportunity 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
6	Information and training activities on the responsible use of digital technology and online security can support people, especially the most vulnerable, in the safe and informed use of the internet.	Positive Impact (Actual)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Information-related impacts for consumers and/or end-users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
7	The development of 5G infrastructures and data centers, together with the growth of data traffic and the use of digital technologies such as artificial intelligence, can significantly increase energy consumption and emissions.	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Energy 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
8	Active engagement of stakeholders such as shareholders, customers, employees and communities in strategic initiatives can foster long-term value creation and generate shared benefits	Positive Impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> G1 Business conduct 	<ul style="list-style-type: none"> G1 Corporate culture 	<ul style="list-style-type: none"> G1-1
9	The adoption of technologies such as artificial intelligence, IoT and cloud can enable efficient solutions with a positive environmental impact, such as intelligent monitoring, smart cities and sustainable agriculture.	Positive Impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Climate change mitigation E1 Adaptation to Climate Change 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3

IRO number	Description of IRO	Type of IRO	Scope of application	Time horizon	ESRS topic	ESRS sub-topic	Disclosure obligation
10	The adoption of technologies such as artificial intelligence, 5G, cloud, and cybersecurity can strengthen the ability to anticipate emerging needs with innovative solutions, consolidating competitive advantage and aligning the offer with customer expectations.	Opportunity	<ul style="list-style-type: none"> Own activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
11	Clear and customized solutions that meet customer expectations in terms of transparency of the offer and continuity of the connection can promote loyalty and revenues	Opportunity	<ul style="list-style-type: none"> Own activities Upstream activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
12	The lack of interventions to promote an informed use of digital can promote social exclusion, exposure to harmful content and the spread of misinformation, with repercussions on education and work	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Downstream activities 	<ul style="list-style-type: none"> Short 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users S4 Consumer Information Impacts 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
13	The lack of diversification of energy sources and the limited use of renewable energy, including self-produced renewable energy, increase dependence on fossil sources and therefore emissions.	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Energy 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
14	The limited involvement of suppliers, with improvement projects, codes of conduct, and audits for the reduction of environmental impact along the supply chain, can weaken stakeholder confidence.	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> G1 Business conduct 	<ul style="list-style-type: none"> G1 Management of relationships with suppliers, including payment practices 	<ul style="list-style-type: none"> G1-1
15	Poor safety measures, insufficient training and lack of effective protective equipment can cause accidents and occupational injuries at work, with damage to the health of employees and workers in the supply chain	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce S2 Workers in the value chain 	<ul style="list-style-type: none"> S1 Working conditions S2 Working conditions 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4 S2-SBM-3 S2-1 S2-4
16	Cyberattacks, system breaches, and infrastructure sabotage can cause service outages, data loss, and business continuity disruption, impacting corporate reputation and bottom line	Risk	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Information-related impacts for consumers and/or end-users S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
17	Inadequate incentive and benefit systems aimed at integrating sustainability into the strategy reduce employee motivation and participation in environmental, social, and governance objectives, with effects on the environment and society.	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Working conditions 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
18	Greenhouse gas emissions generated by direct activities and the value chain can contribute to climate change, with significant effects on the most vulnerable people and territories.	Negative impact (Actual)	<ul style="list-style-type: none"> Own activities Upstream activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Climate change mitigation 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
19	Accessible products, digital services (such as PEC, digital signature, and SPID) and social inclusion initiatives can stimulate people and new generations to participate more actively in community life.	Positive Impact (Actual)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users S3 Affected communities 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users S3 Economic, social and cultural rights of communities 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4 S3-SBM-3 S3-1 S3-4
20	The enhancement of diversity and the creation of an inclusive work environment can promote the attraction of talent, the development of diversified skills and strengthen the corporate reputation	Opportunity	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Equal treatment and opportunities 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
21	The evolution of regulations in the energy sector can lead to increased costs for the purchase of renewable energy and higher expenses for environmental compliance.	Risk	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Energy 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
22	Adopting flexible and hybrid working models, in line with worker expectations and evolving organizational models, can improve employee well-being, increase productivity, and reduce operating expenses	Opportunity	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Working conditions S1 Equal treatment and opportunities 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
23	The growing demand for IoT, cloud, big data, and artificial intelligence can foster the development of sustainable solutions that reduce emissions, with benefits for reputation and market positioning.	Opportunity	<ul style="list-style-type: none"> Own activities Upstream activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Climate change mitigation 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
24	Setting clear and achievable performance goals for employees can strengthen motivation and a sense of responsibility, increasing company productivity	Opportunity	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Working conditions 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
25	Failure to technologically transform legacy infrastructure and platforms can reduce QoS, increase vulnerability, and lead to disruption, with consequences on reputation and economic performance	Risk	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4

IRO number	Description of IRO	Type of IRO	Scope of application	Time horizon	ESRS topic	ESRS sub-topic	Disclosure obligation
26	Failure to comply with privacy laws or unauthorized access to personal data of customers and employees can result in legal penalties, as well as economic and reputational damages.	Risk	<ul style="list-style-type: none"> Own activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce S4 Consumers and end-users 	<ul style="list-style-type: none"> S1 Other work-related rights S4 Information-related impacts for consumers and/or end-users 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4 S4-SBM-3 S4-1 S4-4
27	The increase in digital threats, such as cyberattacks and disinformation campaigns, can generate unforeseen costs and have repercussions on the company's reputation	Risk	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Information-related impacts for consumers and/or end-users S4 Personal safety of consumers and/or end users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
28	Material recovery and product life extension initiatives, aided by regulatory developments and consumer interest in the circular economy, can reduce procurement costs, generate new revenues from recycling, and strengthen competitiveness.	Opportunity	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> E5 Circular economy S4 Consumers and end-users 	<ul style="list-style-type: none"> E5 Waste E5 Resource outflows related to products and services S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> E5-1 E5-2 S4-SBM-3 S4-1 S4-4
29	Failure to adopt artificial intelligence tools and misalignment with the main evolutionary trends in the sector can compromise the company's competitiveness, with repercussions on its reputation	Risk	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> G1 Business conduct 	<ul style="list-style-type: none"> G1 Corporate culture 	<ul style="list-style-type: none"> G1-1
30	Investments in training and research collaborations can anticipate and manage changes in the employment context, attract and maintain a competitive workforce, and generate economic and reputational benefits.	Opportunity	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Equal treatment and opportunity 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
31	Extreme weather events related to climate change can impact service continuity and infrastructure integrity, with additional costs for asset damage and service outages	Risk	<ul style="list-style-type: none"> Own activities Upstream activities Downstream activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> E1 Climate Change 	<ul style="list-style-type: none"> E1 Adaptation to Climate Change 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
32	Initiatives for the development of the territory and involving the reference stakeholders can generate shared economic and social benefits, strengthening the company's reputation and attractiveness for investors.	Opportunity	<ul style="list-style-type: none"> Own activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S3 Affected communities 	<ul style="list-style-type: none"> S3 Economic, social and cultural rights of communities 	<ul style="list-style-type: none"> S3-SBM-3 S3-1 S3-4
33	The lack of high-speed connectivity and digital inclusion actions, aimed at ensuring accessibility and comprehensiveness of the services offered, can affect the quality of the customer experience with repercussions on competitiveness, reputation, and revenues.	Risk	<ul style="list-style-type: none"> Own activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users 	<ul style="list-style-type: none"> S4 Information-related impacts for consumers and/or end-users S4 Social inclusion of consumers and/or end users 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
34	Unstable geopolitical contexts and global health crises can disrupt supply chains and drive up costs, impacting service continuity and economic outcomes	Risk	<ul style="list-style-type: none"> Own activities Upstream activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> S4 Consumers and end-users G1 Business Conduct 	<ul style="list-style-type: none"> S4 Social inclusion of consumers and/or end users G1 Supplier relationship management 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4 G1-1
35	Gender inequalities and the lack of transparency in remuneration systems, career paths, and access to positions of responsibility can hinder the attraction and retention of talent and generate reputational risks	Risk	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Equal treatment and opportunities 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
36	A working environment that does not ensure the "right to disconnect" and that does not provide adequate work-life balance initiatives can affect the stress levels and well-being of employees	Negative impact (Potential)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce 	<ul style="list-style-type: none"> S1 Working conditions 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
37	Inadequate waste management, such as electronic waste, can increase environmental pollution and hinder the transition to the circular economy	Negative impact (Potential)	<ul style="list-style-type: none"> Own activities 	<ul style="list-style-type: none"> Medium Long 	<ul style="list-style-type: none"> E5 Circular economy 	<ul style="list-style-type: none"> E5 Waste E5 Resource outflows related to products and services 	<ul style="list-style-type: none"> E5-1 E5-2
38	Human rights violations, in the company and along the supply chain, can generate legal consequences, reputational damage, and operational impacts	Risk	<ul style="list-style-type: none"> Own activities Upstream activities Downstream activities 	<ul style="list-style-type: none"> Short Medium Long 	<ul style="list-style-type: none"> S1 Own workforce S2 Workers in the value chain 	<ul style="list-style-type: none"> S1 Working conditions S1 Equal treatment and opportunity for all S1 Other work-related rights S2 Working conditions S2 Other work-related rights 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4 S2-SBM-3 S2-1 S2-4

During 2025, the TIM Group updated the double materiality analysis compared to the previous period, which confirmed the substantial continuity of the material IROs in the ESRS topics already identified, while highlighting the growing relevance of issues related to artificial intelligence and digital transformation.

The following table shows the material impacts, positive and negative, identified in the double materiality analysis. For each impact, the following are indicated: the summary description; the type (positive or negative, current or potential); the effect of the

impact, understood as the area on which the impact affects (Environment, People or both); the connection with the business model and, where relevant, with the business strategy; the disclosure obligation in which the impact is treated in more detail.

List of material impacts: scope of incidence and connection with strategy and business model

Impact description	Type of Impact	Impact effect	Connection of impact with Enterprise strategy/model	Disclosure obligation
The development of 5G infrastructures and data centers, together with the growth of data traffic and the use of digital technologies such as artificial intelligence, can significantly increase energy consumption and emissions.	Negative impact (Actual)	• Environment	<ul style="list-style-type: none"> The business model is based on the development and management of network infrastructure and data centers that involve high energy consumption. Investment strategy in 5G networks and advanced digital technologies increases overall energy demand 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
The lack of diversification of energy sources and the limited use of renewable energy, including self-produced renewable energy, increase dependence on fossil sources and therefore emissions.	Negative impact (Actual)	• Environment	<ul style="list-style-type: none"> The business model requires a continuous and reliable energy supply to support network infrastructure and data centers, influencing the mix of sources used. 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
Greenhouse gas emissions from direct activities and the value chain can contribute to climate change, with significant effects on people and on the most vulnerable territories.	Negative impact (Actual)	• Environment • People	<ul style="list-style-type: none"> The business model is based on direct operational activities and an extended value chain, characterized by energy consumption and greenhouse gas emissions. 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
Inadequate waste management, such as electronic waste, can increase environmental pollution and hinder the transition to the circular economy	Negative impact (Potential)	• Environment • People	<ul style="list-style-type: none"> The business model is based on the use, marketing and renewal of network equipment and technological devices, which generate electronic waste streams throughout the life cycle of the products 	<ul style="list-style-type: none"> E5-1 E5-2
The adoption of technologies such as artificial intelligence, IoT and cloud can enable efficient solutions with a positive environmental impact, such as smart monitoring, smart cities and sustainable agriculture.	Positive Impact (Actual)	• Environment	<ul style="list-style-type: none"> The business model is based on the offer of advanced digital and infrastructure solutions The technological transformation strategy is geared towards the adoption of artificial intelligence, IoT, and cloud 	<ul style="list-style-type: none"> E1-SBM-3 E1-2 E1-3
Vulnerabilities in computer systems can cause the loss of sensitive data, with consequences on the privacy of customers and employees and on the protection of information of companies and public administrations	Negative impact (Actual)	• People	<ul style="list-style-type: none"> The business model is based on the provision of connectivity and ICT services, for which system and data security is an essential element 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4 S4-SBM-3 S4-1 S4-4
The lack of interventions to promote an informed use of digital can promote social exclusion, exposure to harmful content and the spread of misinformation, with repercussions on education and work	Negative impact (Actual)	• People	<ul style="list-style-type: none"> TIM's business model is based on the offer of connectivity and digital services that allow access to online technologies and content 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
Poor safety measures, insufficient training and lack of effective protective equipment can cause accidents and occupational injuries at work, with damage to the health of employees and workers in the supply chain	Negative impact (Actual)	• People	<ul style="list-style-type: none"> The business model is based on operational and technical activities that expose workers to professional risks 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4 S2-SMB-3 S2-1 S2-4
Inadequate incentive and benefit systems aimed at integrating sustainability into the strategy reduce employee motivation and participation in environmental, social, and governance objectives, with effects on the environment and society.	Negative impact (Actual)	• People	<ul style="list-style-type: none"> The strategy includes incentive and performance management systems to support employee alignment with ESG objectives. 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
A work environment that does not ensure the "right to disconnect" and that does not provide adequate work-life balance initiatives can affect the stress and well-being levels of employees	Negative impact (Potential)	• People	<ul style="list-style-type: none"> The business model and work organization have an impact on how work time, availability and disconnection are managed 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
Training and development initiatives, also oriented to reskilling, can promote the development of skills, the involvement and satisfaction of employees, contributing to an inclusive and productive work environment.	Positive impact (Actual)	• People	<ul style="list-style-type: none"> The business model requires specialized and constantly evolving skills The investment strategy aims at training and the development of skills 	<ul style="list-style-type: none"> S1-SBM-3 S1-1 S1-4
Information and training activities on the responsible use of digital technology and online security can support people, especially the most vulnerable, in the safe and informed use of the internet.	Positive impact (Actual)	• People	<ul style="list-style-type: none"> The business model is based on the offer of digital services and solutions The strategy is geared towards the development of digital solutions and content aimed at the conscious use of technology 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4
Accessible products, digital services (such as PEC, digital signature, and SPID) and social inclusion initiatives can stimulate people and new generations to participate more actively in community life.	Positive impact (Actual)	• People	<ul style="list-style-type: none"> The business model is based on the offer of digital products and digital services and promotes social inclusion initiatives of communities and consumers. The technological transformation strategy is oriented towards the expansion and diffusion of digital solutions 	<ul style="list-style-type: none"> S4-SBM-3 S4-1 S4-4 S3-SBM-3 S3-1 S3-4
The limited involvement of suppliers, with improvement projects, codes of conduct, and audits for the reduction of environmental impact along the supply chain, can weaken stakeholder confidence.	Negative impact (Actual)	• People	<ul style="list-style-type: none"> The business model is characterized by an extended supply chain and relationships with suppliers that affect transparency and accountability along the supply chain. 	<ul style="list-style-type: none"> G1-1
Transparent reporting procedures and adequate safeguards for whistleblowers can strengthen governance, foster whistleblower confidence, and support a company culture of integrity and legality.	Positive impact (Actual)	• People	<ul style="list-style-type: none"> The business model is characterized by governance structures and an organizational culture oriented towards integrity and legality 	<ul style="list-style-type: none"> G1-1
Active engagement of stakeholders such as shareholders, customers, employees and communities in strategic initiatives can foster long-term value creation and generate shared benefits	Positive impact (Actual)	• People	<ul style="list-style-type: none"> The business model is characterized by structured and ongoing relationships with relevant stakeholders The strategy considers the active involvement of stakeholders an enabling factor of the business model 	<ul style="list-style-type: none"> G1-1

Current and potential financial effects associated with IROs

[48 b, d, f]

The material impacts, risks, and opportunities identified in the double materiality analysis are considered in strategic planning processes and help guide key business decisions. Specifically, these elements are assessed in defining the Strategic Plan and investment priorities, to ensure consistency between the evolution of the business model, the market context, and stakeholder expectations.

This approach allows companies to assess and strengthen the resilience of their strategy and business model to major changes in the economic, technological, regulatory, and environmental context, identifying areas for business development, risk mitigation initiatives, and innovation opportunities.

With reference to the current and **potential financial effects associated with the material IROs**, the following is the main evidence divided by thematic area.

Environment

Extreme weather events caused by climate change represent a physical risk that can disrupt business activities and damage the Group's infrastructure and assets, with potential effects in terms of increased operating expenses and restoration, increased or anticipated investments, and impacts on cash flows.

In order to mitigate these risks and limit their potential financial exposure, the Group has adopted specific monitoring measures, including through risk transfer instruments, differentiated by geographical perimeter:

- Italy: in the domestic area TIM has subscribed to an "All Property" insurance program, with an annual premium of approximately 4.5 million euros, covering the main assets and infrastructure. During 2025, there were no extreme weather events resulting in significant economic losses beyond the deductible threshold provided for by the insurance coverage; therefore, there were no material current financial effects attributable to these events.
- Brazil: TIM S.A. has active insurance policies covering, inter alia, operational risks, general and environmental liability and cyber risks. These coverages provide for total compensation ceilings in excess of 660 million R\$, helping to mitigate the Group's potential financial exposure in relation to extreme weather events.

Social

Regarding personal data protection, failure to comply with applicable legislation or any unauthorized access to customer and employee data may result in penalties, as well as economic and reputational impacts.

During 2025, the company continued its activities to prevent and combat cyber attacks by third parties, notifying the Data Protection Authority (GPDP) of relevant cases of personal data breaches and informing data subjects, in accordance with the provisions of the law.

In the same year, the GPDP carried out an inspection activity focused on the processes of acquisition and activation of contracts, with particular reference to promotional telephone contacts, controls on the telemarketing chain, and the management of requests to exercise the privacy rights of customers. As a result of the verifications, the Authority notified the initiation of a procedure for the possible adoption of corrective and sanctioning measures.

There remains a potential risk associated with other proceedings still in progress, which at the annual report date have not required adjustments to carrying amounts.

In terms of cybersecurity, any attacks on infrastructure could generate operational interruptions with possible economic impacts. In 2025 there were no ICT security incidents with medium or high impact; there were five major incidents, the impact of which was contained by the countermeasures in place, without significant financial effects in the period.

Maintaining ISO 27001, ISO 27035 and ISO 22301 certifications and continuous improvement in incident management contribute to reducing system recovery times, limiting service interruptions and avoiding regulatory penalties, with positive effects on cash flows.

With reference to unfair business practices, in 2025 the AGCOM did not initiate proceedings against TIM that produced financial effects during the year. Similarly, in terms of consumer protection, AGCOM did not order proceedings with financial effects during the year.

In Brazil, with reference to consumer rights, TIM S.A. reports 24 cases of non-compliance with significant laws and regulations, of which 8 with non-pecuniary sanctions and 16 with pecuniary sanctions; during the year, a total of 13.3 million R\$ were paid as penalties, mainly related to the charge for the mobile data service (4G).

Governance

On the subject of business conduct, in 2025, with reference to the Domestic area, the Group did not encounter any significant incidents of non-compliance with applicable laws and regulations; as a result, there were no sanctions or other financial effects during the period.

In Brazil, in 2025, TIM S.A. received 53 administrative proceedings in environmental matters, mainly related to the discussion on the applicability of state and/or municipal legislation depending on the specific jurisdiction. Of these proceedings, 31 ended without the imposition of pecuniary sanctions, while in 22 cases sanctions were applied for a total amount of 666 k R\$.

With reference to the proceedings initiated by the Brazilian Telecommunications Authority (Anatel), in 2025 there were four significant proceedings relating to non-compliance with specific regulatory obligations, in particular in terms of QoS and rights and guarantees of users (three Procedures for the assessment of non-compliance with obligations – PADO – and a Procedure for the assessment of a program item – PADIC). Of these, one was the subject of a dispute during the year, while three are still pending. In 2025, penalties were paid for a total amount of R\$600 k, relating to five proceedings, four of which referred to previous years and one relating to the reporting period.

In tax matters, in the three-year period 2023–2025, with reference to the Domestic area, no significant tax penalties in excess of 100 k euros were paid.

Disclosure Requirement IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities

Double materiality analysis

[53 a]; [53 c iii]; [53 d, g, h]

In continuity with what was done in the previous year, the TIM Group carried out a double materiality analysis to identify material impacts (Impact Materiality) as well as material risks and opportunities (Financial Materiality), in line with the Corporate Sustainability Reporting Directive (CSRD) and the indications of Implementation Guidance 1 – “Materiality Assessment” published by EFRAG.

The activity involved the main companies within the Group, including TIM S.p.A., TIM S.A., Noovle S.p.A., Olivetti S.p.A., Telecom Italia Sparkle S.p.A. and Telsy S.p.A. TIM S.A., in addition to participating in the Group's double materiality analysis, periodically carries out its own analysis; the last available update, included in the ESG Report 2024, did not show significant differences compared to the Group analysis.

To identify a first list of potentially material positive and negative impacts, risks and opportunities, TIM used a dynamic semantic engine based on information extracted from public sources – such as regulations, financial and sustainability reports, as well as online news related to the peers of the reference sectors.

The analysis also integrated benchmarking activities and contributions deriving from the risk and opportunity assessments carried out within the Enterprise Risk Management (ERM) framework, ensuring consistency between the double materiality analysis process and the overall corporate risk management system.

The list was then submitted to internal and external stakeholders for evaluation and integrated through an analysis that, by testing various materiality threshold hypotheses, identified the significant materiality threshold that led to the identification of 38 material IROs.

To support the assessment process, the Group uses quantitative and qualitative analysis tools, including probabilistic models and scenario analysis, also with reference to environmental risks, in line with best market practices and international reference standards, including the TCFD framework.

These tools make it possible to assess the urgency and significance of sustainability risks in relation to other risk categories, ensuring an integrated and proactive management approach. Depending on the results of the assessment, the Company defines and implements mitigation actions prioritized according to the level of risk identified.

The entire double materiality analysis process, including the list of identified impacts, risks and opportunities, is part of a structured governance system that involves the Board of Directors and the competent board Committees, including the Sustainability Committee and the Control and Risk Committee. In this context, the results of the analysis were submitted to the competent Committees for examination and subsequently presented to the Board of Directors for validation.

The process is reviewed periodically and updated in the event of significant changes in the Group's regulatory, strategic or operational context. In continuity with the previous year, the current analysis was carried out on the basis of the same methodology, taking into account the evolution of the regulatory framework and the developments in the scope and activities of the Group.

With regard to the internal control procedures related to sustainability reporting, please refer to the paragraph on the disclosure obligation GOV-5 – “Risk management and internal controls over sustainability reporting”.

Assessment of significant impacts

[53 b i, ii, iii, iv]

The potentially material impacts were identified considering the general and specific dynamics of the reference sector⁹, as well as the impacts generated directly by the activities of the TIM Group and those deriving indirectly from business relationships with suppliers and customers. The analysis also takes into account the characteristics of the Group's value chain in the Italian and Brazilian contexts and considers the impacts on people and the environment, positive or negative, current or potential, over a short, medium, and long-term time horizon.

The impact assessment was carried out through differentiated methods according to the categories of stakeholders involved. In particular, individual interviews (one-to-one) were carried out for internal stakeholders — which include the directors of the Sustainability Committee, the Chairman, the top management (C-level) and the managers of the main functions and group companies of the Group — while a structured survey was administered for external stakeholders.

For the administration of the survey to external stakeholders, a representative sample was selected for each of the following categories: TIM People (including employees and workers' representatives); Customers; Media; Sector Business community; Institutions and regulatory bodies; Suppliers; Civil Society; Financial community. Overall, over 5,000 stakeholders were involved, with a response rate of 34%.

Impacts were assessed by assigning a relevance level based on a scale of 1 to 5 applied to the different assessment factors, consistently for both positive impacts and negative impacts.

For negative impacts, the assessment considered the severity of the impact, defined as the average of the factors of scale, scope and irremediable nature, and the probability of occurrence.

For positive impacts, the assessment considered the severity of the impact, determined as the average of only the scale and scope factors, and the probability of occurrence.

⁹ The reference sector, following the adaptation of the corporate purpose, considers, in addition to Technology & Telecommunication in continuity with 2024, also the Insurance, Consumer finance, Electric utilities and power generation, and Gas utilities and distribution sectors.

The overall score of each impact is calculated as a product of the severity of the impact and the probability of occurrence and can take a value between 1 and 25. Impacts with a score of 9 or higher were considered material for the double materiality analysis.

Assessment of material risks and opportunities

[53 c i, ii]; [53 e, f]

The TIM Group assigns strategic priority to risks related to sustainability, integrating them into overall corporate risk management processes.

Similar to impacts, risks and opportunities were also identified through a semantic analysis of documentary sources relating to TIM Group's industry peers and value chain actors, both upstream and downstream.

The list thus defined was shared with the Enterprise Risk Management (ERM) function in order to verify its completeness and consistency with respect to the corporate risk management framework and possibly integrate it. The ERM function also participated in the evaluation process as an internal stakeholder, contributing to the attribution of scores.

The relevance of risks and opportunities was determined by scoring the assessment factors on a scale of 1 to 5. In particular, the assessment considered the magnitude of the risk or opportunity, understood as the relevance of the economic and/or reputational effect, and the probability of occurrence. The overall score of each risk and opportunity is calculated as a product between the entity and the probability of occurrence and can take a value between 1 and 25. Risks and opportunities with a score of 9 or higher were considered material for the double materiality analysis.

Regardless of the outcome of the quantitative evaluation, the risks associated with the protection of human rights were still considered material.

The assessment of the material risks is carried out in line with the ERM framework, ensuring alignment with the Group's overall risk profile and with the objectives of the Business Plan. The information that emerged as part of the double materiality analysis is considered, where relevant, for the purposes of updating the risk management model and the related mitigation measures.

Similarly, material opportunities are evaluated according to their potential economic and financial contribution and the degree of alignment with the Group's strategic priorities. Opportunities identified as material are integrated into decision-making processes and, where relevant, monitored through specific indicators (KPI), in order to assess their evolution and potential effects in the medium to long term.

Material impacts, risks, and opportunities – Climate change

[E1 IRO-1, 20 a, b, c i, ii]; [E1 IRO-1 21]

In line with the double materiality analysis process, TIM has identified and assessed the material impacts, risks and opportunities related to climate change.

The activities of the TIM Group and its value chain can generate significant impacts on climate change through greenhouse gases emissions, as described in disclosure E1-6 "Gross GHG emissions of Scope 1, 2, 3 and total GHG emissions". In view of these potential impacts, the Group has integrated the risks and opportunities related to climate change into the Enterprise Risk Management process, adopting a structured approach that considers short (0–3 years), medium (3–5 years) and long-term (5–20 years) time horizons and that includes the entire value chain, including its own, upstream and downstream operations, in line with the Group's Internal Control System and Risk Management System.

As part of this process, TIM has identified and assessed, in the short, medium and long term, the main physical risks related to climate change, connected both to the progressive increase in temperatures and to the greater frequency and intensity of extreme weather events, such as landslides, floods and inundations, which can cause damage to property and network assets, an increase in insurance costs and potential impacts on business continuity and production capacity, also in relation to thermal stress on the workforce.

For the risk assessment, TIM conducted qualitative and quantitative scenario analyses at Group level, referring to the climate scenarios developed by the Network for Greening the Financial System (NGFS), in particular to RCP 2.6 and RCP 4.5 scenarios, used to support the assessment of the resilience of the Group's climate strategy over different time horizons. Climate scenario analysis is used as an integrative tool in the Enterprise Risk Management process to guide the identification and assessment of physical risks, transition risks, and related opportunities. In particular, the selected scenarios are used to test the resilience of corporate assets and strategies over short, medium and long term horizons, to compare different climate change trajectories and to define appropriate mitigation and adaptation plans.

With reference to the hydrogeological risk, in the scenario of transition to Net Zero by 2050, TIM used the risk maps provided by Climada to correlate assets to the different levels of climate risk and estimate their economic impact on the basis of reconstruction and replacement costs, quantifying by 2030 an increase in the risk value in relation to the exposure and vulnerability of assets in line with the risk analyses carried out to support the planning and operational management processes. The assessment of the exposure of assets and activities to climate hazards includes the analysis of vulnerability conditions, the mapping of critical assets, the quantification of exposure levels according to physical parameters and the determination of the associated gross physical risk, expressed in economic and operational terms.

In relation to chronic physical hazards, climatic conditions with high temperatures and high humidity can lead to a reduction in labour productivity. For TIM, this risk can translate into an estimated economic loss of between 16 million euros (with a reduction in work performance of 0.8% in the best scenario at +1.4°C) and 50 million euros (with a reduction in work performance of 2.4% in the worst scenario at +2°C).

TIM also identified the main transition risks related to climate change, with particular reference to regulatory risks, the increase in operating expenses deriving from the introduction of a carbon tax on CO₂ emissions and the increase in spending on the purchase or production of renewable energy. To this end, an NGFS transition scenario aligned with containing global temperature rise within 1.5°C was considered, with a quantitative analysis consistent with the path towards achieving the Net Zero target by 2040. By

2040, a progressive reduction in CO₂ emissions consistent with this path has been estimated, including scenarios of failure to achieve the reduction targets with hypothetical deviations of 10%, 20% and 30%.

With reference to the hypothesis of introduction of a carbon tax during the decade, TIM has estimated an annual carbon tax assuming a unit price of 83.5 euros per ton of CO₂ (average price 2024) and, to mitigate its economic impact, has brought forward to 2025 the objective of sourcing 100% electricity from renewable sources in Italy, while this objective is already achieved for Brazil.

The Group has also identified opportunities related to the transition to a low-emission economy, in particular in relation to increasing energy efficiency, the use of energy from renewable sources, and the progressive alignment of investments with the criteria of the EU Taxonomy, with potential benefits in terms of reducing energy costs and strengthening competitive positioning.

Transition risk may lead to increased operating costs in the medium term, particularly as a result of evolving energy regulations, which could lead to higher costs for the procurement of energy from renewable sources and for compliance with environmental requirements (IRO 21). In this context, TIM assessed the degree of alignment of its assets and main operating processes with the transition to a zero-emission economy, in accordance with Delegated Regulation (EU) 2021/2139 and the principles of the EU Taxonomy. The analysis focused in particular on data centers, network infrastructure, energy consumption, and dependence on fossil fuels along the supply chain. The actions taken to manage this risk are described in disclosure obligation E1-3 "Actions and resources related to climate change policies."

To support operational resilience, TIM monitors the evolution of significant climatic events that may affect the ICT sector and periodically verifies, through exercises and tests, the response capacity and continuity of the Essential Communication Services in the presence of extreme climatic events or emergency situations, as part of the Group's business continuity and emergency management measures.

Material impacts, risks, and opportunities – Resource use and circular economy

[E5 IRO-1, 11 a, 11 b]

Consistent with the double materiality analysis process adopted by the Group, the identification and assessment of the relevance of impacts, risks and opportunities related to resource use and the circular economy have concerned, in particular, incoming resource flows, outgoing resource flows and waste management along the entire Group value chain, both upstream and downstream, taking into account the contribution of internal and external stakeholders, including civil Society.

Following the analysis, two material IROs were identified, both attributable to the ESRS E5 topic "Resource use and circular economy", respectively, a negative impact and an opportunity, related to outgoing resource flows and waste management.

Material impacts, risks, and opportunities – Business conduct

[G1 IRO-1, 6]

As part of the process of identifying the material IROs related to business conduct issues, the TIM Group has considered a plurality of factors specific to the operating environment and the sector to which it belongs.

In particular, the geographical location of the activities was assessed, taking into account the countries in which the Group operates and the potential risks of negative impacts related to ethical profiles, human rights, and regulatory compliance. The activities carried out and the different business areas were also analyzed, in order to assess exposure to risks of unethical conduct.

The process also considered the characteristics of the reference sector, characterized by a strict regulatory framework and specific issues regarding privacy, data security and social responsibility. Finally, the structure of the Group's operations was examined, evaluating the corporate governance system, the management methods of subsidiaries and joint ventures, as well as the compliance and internal control policies adopted to prevent unethical behavior.

Policies (MDR-P)

Minimum disclosure requirement – MDR-P Policies – Policies adopted to manage material sustainability issues

[MDR-P 65 a, b, c, d, e, f]

The Group Policies take into consideration aspects identified as fundamental and priority on the basis of analyses conducted internally and, where necessary or appropriate, also taking into account regulatory references and external contexts, including market standards and guidelines. These aspects reflect the interests of the relevant stakeholders and are closely linked to the operations of the TIM Group Companies.

In order to ensure adequate dissemination, the Group Policies are made available to relevant stakeholders through the institutional channels of the TIM Group, in compliance with the principles of "least privilege" and "need to know". In particular, the documents are made available through the company intranet and the Group institutional website. In addition, in relations with third parties, where provided, the Group regulates the acknowledgement and/or compliance with the Policies by means of specific contractual clauses. Information relating to TIM S.A.'s policies is made available on its institutional website, in the section dedicated to regulations and policies.

Below is the list of ESG-relevant policies.

1. Purchases of Products and Services

Contents and objectives of the Policy

The Policy defines the general principles and framework for the management of procurement processes throughout the purchasing life cycle, establishing common rules for the planning, management and control of activities, as well as procurement commitments in terms of environmental and social responsibility. The document governs the entire purchasing process, from the planning of needs to the selection and management of suppliers, up to the contracting and monitoring of supplies, ensuring an approach aimed at monitoring costs, quality, and operational continuity, in line with the Group's industrial objectives. The Policy also establishes the ways in which sustainability is operationally integrated into the procurement process, providing for the inclusion of environmental, social, and ethical criteria in the planning, selection, qualification, and management of suppliers along the value chain.

The main objectives of the Policy are to:

- centrally govern the purchasing processes, strengthening the Group's negotiating power and ensuring cost control, economies of scale and adequate levels of quality of supplies;
- accurately plan requirements, supporting make or buy decisions based on costs, available resources and operational priorities;
- foster fair and transparent competition among suppliers, ensuring equal treatment and consistency with the applicable sustainability criteria;
- select, qualify, and monitor suppliers and subcontractors on the basis of technical, economic, reputational, and sustainability criteria;
- monitor supply risks and promote the continuous improvement of suppliers' performance, through the definition and monitoring of service levels and the use of tools such as audits, rating systems, training activities, and collaboration initiatives (e.g. JAC, Open-es);
- require suppliers and subcontractors to make a formal commitment to comply with ESG principles, including legality, human rights, occupational health and safety, and environmental protection along the entire value chain;
- integrate environmental criteria into the purchasing process, promoting technical and operational solutions aimed at reducing the environmental impacts of supplies and the progressive orientation towards circular models.

With reference to material IROs relating to "climate change" and "Workers in the value chain", the policy ensures compliance, throughout the supply chain, with the Group's ethical and sustainability values at all times, requiring a similar formal commitment from suppliers and promoting, through the latter (and any subcontractors), respect for lawfulness, human rights and the rights of the person, environmental sustainability, health and safety at work and the provisions of TIM's Anti-Corruption Management System.

To this end, the supply contracts provide for the possibility for TIM and for the Group Companies to carry out verification activities on the suppliers and on the services for which they are responsible, in compliance with the current regulatory and procedural framework, as well as to carry out ESG audits in accordance with the JAC guidelines.

Scope of the Policy

This Policy applies to TIM S.p.A., the TIM Foundation and the Italian and foreign companies of the TIM Group. It applies to all purchases managed by the Procurement Department of TIM S.p.A. on behalf of the Group Companies and provides a reference framework also for the companies that do not grant a purchasing mandate, or grant it only partially.

For foreign companies, the application takes place in compliance with local regulations and internal procedures in force.

The Policy is addressed to employees and collaborators involved in the purchasing process, in any capacity and in any operational mode, including activities carried out in person or remotely as well as digital communications, and also defines principles and expectations of behavior applicable to suppliers and, as far as relevant, to sub-suppliers and subcontractors, with reference also to respect for the rights and working conditions of people employed along the supply chain.

Responsible for Policy implementation

The implementation of the Policy is entrusted to the company functions involved in the purchasing process, each for their own skills and responsibilities. In particular, TIM SpA's Procurement Department ensures the overall supervision of the procurement process, while the user Functions and Companies contribute to the planning of needs and the supervision of supplies. The Chief Financial Office, Legal Regulatory and Tax, and Corporate Communication & Sustainability Departments support the implementation of the Policy, respectively for the aspects of economic control, regulatory compliance, and integration of ESG criteria in supply chain management.

External national and international regulatory references of the Policy

- Legislative Decree no. 231 of 8 June 2001 – Discipline of the Administrative Liability of Legal Persons, Companies and Associations;
- Legislative Decree no. 196 of 30 June 2003 – Personal Data Protection Code (Privacy Code);
- Regulation (EU) 2016/679 of the European Parliament and of the Council – General Data Protection Regulation (GDPR);
- Presidential Decree no. 313 of 14 November 2002 – Consolidated Law on Criminal Records and Pending Charges;
- Legislative Decree no. 81 of 9 April 2008 – Consolidated Law on Health and Safety at Work;
- Legislative Decree no. 152 of 3 April 2006 – Environmental Consolidated Act;
- CONSOB Resolution no. 17221 of 12 March 2010 – Provisions relating to Transactions with Related Parties;
- Law no. 262 of 28 December 2005 – Measures for the Protection of Savings and the Regulation of Financial Markets;
- Directive (EU) 2022/2464 of the European Parliament and of the Council – Corporate Sustainability Reporting Directive (CSRD);
- Legislative Decree no. 125 of 6 September 2024 – Implementation of the Corporate Sustainability Reporting Directive (CSRD) in Italy;
- Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 – European Sustainability Reporting Standards (ESRS).

ESRS covered by the Policy:

E1-2; S2-1.

IROs affected by the Policy

7; 9; 13; 15; 21; 23; 38.

2. Anti-corruption

Contents and objectives of the Policy

The Policy defines the framework, principles and rules of conduct adopted by the TIM Group to prevent and combat any form of active and passive corruption, direct or indirect, in line with the values expressed in the Code of Ethics and Conduct and with the 231 Organizational Model.

The Policy is part of the Group's Anti-Corruption Management System, inspired by the international standard UNI ISO 37001, and represents a central tool of the governance and internal control system. It defines homogeneous guidelines and principles for the Group's approach to the prevention of the risk of corruption, promoting conduct consistent with the principles of legality, integrity and transparency.

The Policy guides the behavior of the Group's people and those who work on its behalf, promoting a company culture based on zero tolerance towards corrupt practices or, in any case, practices that do not comply with laws and ethical principles, to protect the reliability, reputation, and sustainability of company activities, reducing exposure to legal, economic, and reputational risks.

The main objectives of the Policy are to:

- prevent, identify and mitigate the risks of active and passive corruption related to company activities, processes and relationships with third parties;
- ensure compliance with national and international anti-corruption regulations applicable to the Group's activities and lines of conduct;
- promote ethical, fair and responsible behavior on the part of all the recipients of the Policy, strengthening awareness of the risks of corruption;
- support a structured and coherent approach to corruption risk management, in line with the Anti-Corruption Management System;
- protect the Group from sanctions, operational limitations, economic losses and reputational damage resulting from unlawful or non-compliant conduct;
- promote a culture of legality, integrity and transparency, encouraging the responsible use of reporting tools including by third parties who have business relations with the Company.

Scope of the Policy

It applies to TIM S.p.A. and the Subsidiaries of the TIM Group, including national and foreign companies, and concerns the members of the corporate bodies, management, employees, and all those who operate on behalf of the Group Companies, in any capacity.

The Policy also applies to relations with third parties, such as suppliers, business partners, consultants, intermediaries, and other parties that have business relations with the Group, who are required to comply with the principles and standards of conduct defined in the Policy.

For listed subsidiaries and companies certified in accordance with UNI ISO 37001, the Policy constitutes a reference for the adoption of their own anti-corruption policies, consistent with the Group's principles.

In relation to joint ventures and Investee Companies, TIM uses its influence, as reasonable under the circumstances, to ensure that these companies and entities comply with the standards and rules of conduct defined in the Anti-Corruption Policy.

Responsible for Policy implementation

The Anti-Corruption Policy is approved by the Board of Directors of TIM, after an investigation by the Control and Risks Committee. Responsibility for the implementation of the Policy and the monitoring of the Anti-Corruption Management System (AMS) is entrusted to the Compliance Department, identified as a Compliance Function for the prevention of corruption, which operates with adequate autonomy and independence and is responsible for the overall supervision of the AMS, ensuring its consistency with the requirements of the UNI ISO 37001:2016 standard. Within the scope of its responsibilities, the Compliance Department supports the management and the competent bodies in the implementation of the Policy and in the monitoring of the control presides, working in coordination with the other actors of the internal control system and risk management system.

External national and international regulatory references of the Policy

- Legislative Decree no. 231 of 8 June 2001, no. 231;
- Criminal Code and Civil Code, with reference to the provisions relevant to corruption offences;
- National and international regulations on anti-corruption;
- International anti-corruption conventions, including the United Nations Convention against Corruption (UNCAC) and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- UK Bribery Act;
- US Foreign Corrupt Practices Act (FCPA);
- ISO 37001:2016 – Anti-Bribery Management Systems – Requirements with guidance for use.

ESRS affected by the Policy

G1-1

IROs affected by the Policy

2; 4.

3. Business Continuity

Contents and objectives of the Policy

The Policy defines the principles and framework adopted by the TIM Group to ensure the operational continuity of services and the resilience of infrastructures in the event of events that may compromise the operation of critical processes, including extreme weather events, technological incidents, and threats to the security of information systems.

The Policy is part of the Group's governance system and guides a structured approach to the management of crisis and emergency situations that may result in service interruptions, damage to assets, loss or compromise of data, and impacts on the Group's reputation and financial performance. In this context, the Policy contributes to the protection of critical infrastructure, IT systems and information, as well as to personal data protection and the protection of sensitive data of customers, employees and other interested parties.

The main objectives of the Policy are to:

- ensure the continuity of essential services and critical processes even in the presence of extreme weather events, technological incidents or cyber attacks;
- protect the integrity of infrastructure, information systems and business assets, reducing the impacts deriving from material damage or operational interruptions;
- prevent and mitigate the risks of loss, unavailability or compromise of data and information, including personal and sensitive data;
- strengthen the organization's ability to respond effectively to crisis events, limiting the effects on business continuity, reputation and economic performance;
- ensure a consistent and integrated approach to business continuity management, in coordination with the Group's other safety and resilience presides.

Scope of the Policy

The Business Continuity Policy applies to TIM S.p.A. and all TIM Group Companies, in Italy and abroad, and concerns the operational functions, process owners, and support structures involved in the management of company activities and essential services.

The principles of the Policy are applied to the activities, processes, systems, data and infrastructures considered critical for the achievement of the Group's business objectives and for the continuity of the provision of services, in line with the perimeter of the risks that may affect operational resilience.

Responsible for Policy implementation

The implementation of the Business Continuity Policy is entrusted to the "Crisis, Monitoring & Continuity Management" organizational structure, within the "Chief Public Affairs, Security & International Business Office" Department of TIM S.p.A., which is responsible for the overall supervision and coordination of the Business Continuity system.

The competent company structures and process managers contribute to the application of the Policy within the scope of their respective responsibilities, ensuring alignment with the defined guidelines and the integration of business continuity in the activities under their responsibility.

External national and international regulatory references of the Policy

The Business Continuity Policy is defined in line with international principles and best practices on business continuity and is aligned with the ISO 22301 - Business Continuity Management Systems (BCMS).

TIM S.p.A. is certified in accordance with the ISO 22301 standard, which is the reference for the adoption of consistent Business Continuity policies also by group companies.

ESRS affected by the Policy

E1-2; S4-1.

IROs affected by the policy

1; 7, 16; 25; 27; 31; 34.

4. Service Charter

Contents and objectives of the Policy

The TIM Service Charter, relating to fixed and mobile telephony services, defines the principles and framework adopted by TIM to ensure a transparent, correct and informed relationship with its customers throughout the entire cycle of the contractual relationship. The document represents a tool for customer protection and information, aimed at making clear and understandable the characteristics of the services offered, the contractual conditions, the quality standards, the rights of customers, and the methods of access to assistance and complaint channels.

The Charter guides the provision of clear and personalized solutions, responding to customers' expectations in terms of transparency, accessibility of products and services and continuity of connection, elements that contribute to strengthening customer confidence, satisfaction and loyalty. In this context, the document also promotes access to digital services and benefits dedicated to customers with special needs, promoting inclusion and participation in economic and social life.

The Service Charter also helps to manage the risks associated with service interruptions and disruptions, defining measurable commitments in terms of quality, activation and repair times, compensation and complaint procedures, to protect the continuity of the service and the reliability of the offer, with positive effects on customer loyalty and revenue stability.

The main objectives of the Service Charter are:

- ensure transparency and clarity of the offer, providing complete and understandable information on services, contractual conditions, and customer rights;
- ensure service quality standards consistent with applicable legislation, including through measurable commitments and compensation mechanisms in the event of disruption;
- protect the continuity of the connection and the usability of fixed and mobile telephony services, reducing the impacts deriving from interruptions or malfunctions;
- promote accessible products and services, including digital services and concessions for customers with special needs, promoting social inclusion;
- strengthen customer confidence and satisfaction, contributing to loyalty and value creation in the medium to long term.

Scope of the Policy

The Service Charter is aimed at all TIM customers who use fixed and mobile telephony services, regardless of the type of offer or contract entered into.

The principles and commitments contained in the Charter apply to the services provided by TIM throughout the contractual relationship with the customer, from the activation phase to the management of the service and assistance, in accordance with the applicable legislation and the contractual conditions.

Responsible for Policy implementation

The implementation of the Service Charter is ensured by the competent corporate functions, which contribute, within the scope of their respective responsibilities, to ensuring compliance with the service standards and quality commitments made to customers.

External national and international regulatory references of the Policy

The TIM Service Charter is drawn up in accordance with the guidelines of the Autorità per le Garanzie nelle Comunicazioni (AGCOM), pursuant to Resolution no. 179/03/CSP, as subsequently amended and supplemented.

ESRS affected by the Policy

S4-2

IROs affected by the Policy

11; 16; 19; 33.

5. Code of Ethics and Conduct**Contents and objectives of the Policy**

The code of ethics and conduct defines the values and lines of conduct that guide the action of the TIM Group in carrying out its activities and in relations with all stakeholders, promoting a corporate culture based on integrity, legality, transparency, respect for people, and social and environmental responsibility. The document constitutes a fundamental reference of the governance system and the internal control system and risk management system and is an integral part of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001.

The document guides the decisions and behaviors of the corporate bodies, management, the people of the Group, and the subjects who work on its behalf, regulating conduct in internal relations and in relations with customers, suppliers, partners, institutions, and communities. In this framework, the Code covers in a transversal way the main risk and opportunity profiles related to business conduct, including those related to fairness in business, the prevention of illegal behavior, the protection of human rights and working conditions, the protection of data and information, the responsible use of digital technologies, as well as the social and environmental impacts of the Group's activities.

The Code also incorporates principles and commitments aimed at promoting inclusion, equal opportunities, health and safety at work, people's well-being, work-life balance, as well as the conscious and responsible use of technological innovation, including Artificial Intelligence, in compliance with applicable regulations and the best national and international guidelines. Finally, the methods of compliance with the Code are regulated, including the reporting, control and management of violations, as well as the criteria for dissemination, adoption and periodic updating of the document.

The main objectives of the Code are:

- define the values and lines of conduct that inspire the Group's actions and guide its strategic and operational choices;
- promote ethical, correct and responsible behavior, consistent with the principles of environmental and social sustainability, in the interest of current and future stakeholders, valuing sustainability and innovation as factors of development and success;
- ensure compliance with the laws, regulations and rules applicable in the contexts in which the Group operates;
- prevent unlawful or non-compliant conduct, including that relevant to the administrative liability of entities;
- protect the dignity, rights, health and safety of people, promoting an inclusive and respectful work environment; combating all forms of discrimination and promoting equal opportunities, work-life balance, and flexible working methods, while respecting the right to disconnect;
- ensure fairness, transparency and loyalty in relations with all stakeholders; including local communities, institutions and civil society;
- ensure the reporting, control and management of violations;
- contribute to sustainable business growth, promoting environmental and social responsibility and respect for the rights of future generations and the well-being of the communities in the territories in which the Group operates;
- promote the reduction of the environmental impacts of the Group's activities and support the energy transition, also through the offer of services and solutions that promote more sustainable development models and lifestyles for the benefit of communities in the reference territories and customers.

Scope of the Policy

The Code of Ethics and Conduct applies to TIM S.p.A. and all TIM Group Companies, including foreign subsidiaries. TIM S.A. has adopted its own code of ethics and conduct, whose principles are aligned with those adopted by the TIM Group.

The Code constitutes a binding reference for the corporate bodies, management, employees, and all those who work on behalf of the Group, in any capacity. Where required by the company's procedural system, the Code also applies to third parties who have relations with the Group, such as suppliers, partners, and collaborators, whose behavior may affect the Group's reputation and reliability.

The principles and rules of conduct apply along the entire value chain and integrate the system of company policies and procedures.

Responsible for Policy implementation

The "Code of Ethics and Conduct" is approved by TIM's Board of Directors, which ensures its oversight within the Group's governance system. The corporate bodies and management are responsible for the implementation of the Code and for promoting behaviors consistent with the values and lines of conduct contained therein. The Compliance Department supports the application of the Code and handles dissemination and training activities. Through the Whistleblowing Procedure, the monitoring of the mechanisms for reporting and managing violations is ensured, in line with the Organization, Management and Control Model adopted pursuant to Legislative Decree 231/2001.

External national and international regulatory references of the Policy

- Legislative Decree no. 231 of 8 June 2001, as subsequently amended – Discipline of the Administrative Liability of Legal Persons, Companies and Associations;
- Law no. 179 of 30 November 2017 and Legislative Decree no. 24 of 10 March 2023 – Protection of Whistleblowers;
- Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR);
- National and European regulations on market abuse and insider information;
- National and international regulations on anti-corruption and combating offences against the Public Administration;
- UNI ISO 37001 – Anti-Bribery Management Systems;
- Directive (EU) 2022/2464 – Corporate Sustainability Reporting Directive (CSRD).

ESRS affected by the Policy

E1-2; S1-1; S3-1; S4-1; G1-1.

IROs affected by the Policy

1; 6, 11, 15, 18, 20, 22, 24, 26, 35, 36.

6. Human Rights

Contents and objectives of the Policy

The Policy defines the framework through which the Group integrates respect for human rights into its activities and relations with third parties, formalizing the commitment to operate in line with the main international references on the subject, including the principles of the United Nations and the Global Compact. This commitment applies across all areas of activity and extends to relationships with employees, workers in the value chain, business partners, customers, and communities in the contexts in which the Company operates, including indigenous peoples, as provided for by the international standards of reference for the policy. The Policy is referred to in the main company policies and operating procedures as well as in the management systems; The Group also encourages its stakeholders, including consumers and end users, to provide feedback with a view to continuous improvement.

In line with these principles, the Policy makes explicit the Group's commitment to prevent and combat any form of violation of the fundamental rights of the person, prohibiting any form of forced or compulsory labor, trafficking in human beings and exploitation of child labor and undertaking not to resort, directly or indirectly, to the employment of persons under the age of 18.

Starting from these general principles, the Policy articulates the areas of protection in relation to the Group's main areas of impact, distinguishing between rights related to the core business, workers' rights, and rights along the value chain.

With reference to the core business, the Policy considers the rights of customers and end users connected to the provision of telecommunications services and digital services, promoting fair access to services and innovation, the protection of freedom of expression, personal data protection and information security, as well as the protection of vulnerable groups — in particular minors — with respect to potentially harmful content or services. The principles of responsible advertising, zero tolerance for corruption and careful management of environmental impacts related to company activities are also recalled.

With reference to Group workers, the Policy protects fundamental rights in the workplace, including the prohibition of discrimination and harassment, the guarantee of fair working conditions, respect for working hours and wages, the protection of maternity, and freedom of association. Particular importance is attributed to occupational health and safety, through measures aimed at the preventing accidents and occupational diseases and the promotion of well-being in the workplace.

The same principles are extended, in proportion to the level of influence exercisable by the Group, to workers along the value chain. In this context, the Policy requires compliance with the minimum age for access to work, working conditions that are decent, and adequate health and safety standards, providing for qualification and monitoring mechanisms for suppliers and business partners.

The Policy provides, for all relevant activities within its scope, a periodic internal due diligence process, inspired by the United Nations Guiding Principles on Business and Human Rights, aimed at:

- identify and evaluate material topics in the area of human rights related to the Group's activities;
- verify that each area is adequately managed, monitored and tracked — where possible through indicators — with clearly assigned responsibilities;
- define, if necessary, actions for the progressive improvement of the measures adopted.

During the year, the Group began a process of reviewing and updating its human rights due diligence, aimed at strengthening its alignment with the sectoral and geographical context of operations. As part of this review, six priority areas have been identified, which will be formally incorporated into the new version of the Policy, whose approval is expected during 2026. The priority areas identified are the following:

- Environmental protection: monitoring of environmental impacts related to company activities, with reference to emissions, efficient use of resources, waste management, and circular economy.
- Equal treatment and fair working conditions: guarantee of equal opportunities, non-discrimination, pay equity, and respect for the dignity of the person at all stages of the employment relationship.
- Health and safety at work: prevention of accidents and occupational diseases through structured risk management systems and promotion of a widespread safety culture, also extended to contractors and subcontractors.
- Freedom, security and equity in access to digital technologies: promotion of fair access to digital services, protection of vulnerable persons, and guarantee of security and continuity of services.
- Personal data protection and information security: correct and secure management of data and information systems, prevention of breaches, and strengthening of cybersecurity and operational continuity safeguards.
- Respect for human rights along the value chain: prevention and management of impacts on the workers' rights of suppliers and partners, with particular attention to fair working conditions, health and safety, prohibition of forced and child labor, through qualification and monitoring processes.

Scope of the Policy

It applies to TIM S.p.A. and all TIM Group Companies, including foreign subsidiaries, and constitutes a binding reference for Group employees.

It concerns third parties who have relations with the Group, such as suppliers, contractors, subcontractors, partners and collaborators, as well as the workers employed by them, in relation to behaviors and practices relevant to the respect for human rights in the context of business relations with the Group.

The principles and control mechanisms of the Policy are integrated into the system of company policies and procedures.

Responsible for Policy implementation

The adoption of the Human Rights Policy was arranged by the first levels of the main corporate functions within the Group's governance system. The management of the group companies and the relevant departments is responsible for implementing the Policy and promoting conduct consistent with the principles and commitments contained therein.

The Corporate Communication & Sustainability Department is responsible for updating the Policy and the due diligence process; the Human Resources & Organization Department is responsible for compliance with the Policy with reference to the Group's people; the Procurement Department oversees the application of the Policy in relations with suppliers, contractors and subcontractors; the Compliance Department oversees the risk of non-compliance with the relevant regulations and standards.

External national and international regulatory references of the Policy

The Policy is consistent with the main international standards and initiatives on human rights, including:

- The UN Guiding Principles on Business and Human Rights (UNGPs);
 - The ILO Declaration on Fundamental Principles and Rights at Work and its core Conventions;
 - The OECD Guidelines for Multinational Enterprises;
 - The Principles of the United Nations Global Compact, of which TIM is among the founders and an active participant in the Networks in Italy and Brazil.
- In implementing the Policy, the Group also takes into account additional national and international instruments and regulatory references, including:
- The Universal Declaration of Human Rights (1948);
 - The International Covenant on Civil and Political Rights (1976);
 - The International Covenant on Economic, Social and Cultural Rights (1976);
 - The main ILO Conventions on forced labour, freedom of association, non-discrimination, equal remuneration, minimum age and protection of maternity;
 - The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
 - Sector-specific guidelines and tools, such as the ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, published by the European Commission;
 - The Charter for Equal Opportunities and Equality at Work, signed by the Group.

ESRS affected by the Policy

S1-1; S2-1; S3-1.

IROs affected by the Policy

12, 15, 16, 17, 19, 20, 24, 25, 26, 27, 33, 35, 36, 38.

7. Management of episodes Gender Based, Sexual, Harassment and Bullying Policy

Contents and objectives of the Policy

The Policy defines the principles and framework for the prevention, management and combating of incidents of gender harassment, sexual harassment and bullying, in order to ensure a safe, inclusive and respectful working environment for people's dignity.

The Policy defines a structured process for the prevention, management and fight against harassment and bullying, integrated into the TIM Group's governance system and consistent with the code of ethics and conduct, the human rights policy, human resources and equal opportunities policies, and whistleblowing procedures. The process involves the activation of dedicated, accessible, and secure reporting channels, a preliminary evaluation phase of the reports, and the operational management of the cases using differentiated methods based on their relevance, as well as the communication of the results in compliance with confidentiality. The Policy also regulates the adoption of measures to protect the whistleblower and other persons involved, including the prevention of retaliation, and the activation of appropriate support tools, ensuring impartiality, traceability and consistency in the management of incidents, in accordance with applicable regulations and the Group's ethical values.

The main objectives of the Policy are to:

- prevent and combat all forms of gender harassment, sexual harassment, stalking, and bullying through training, awareness-raising, and dissemination of a culture of respect;
- promote a work environment that is inclusive, safe and oriented towards the well-being and enhancement of people;
- make clear, accessible and safe channels available for reporting inappropriate behavior, ensuring confidentiality and protection;
- ensure a structured, timely and impartial management of reports, through evaluation and treatment processes consistent with the principles of fairness and transparency;
- protect and support those involved, including those reporting in good faith, including through protective measures against retaliation and discrimination;
- ensure traceability and consistency in the management of incidents, in compliance with applicable regulations and the Group's ethical values;
- contribute to the maintenance of a healthy organizational climate and to the protection of the reputation and reliability of the Group.

Scope of the Policy

It applies to TIM S.p.A. and the Italian companies of the TIM Group and constitutes a reference for the TIM Group's foreign companies, which adopt its principles in compliance with local regulations.

It is addressed to all persons working on behalf of the Group, regardless of their role, location or type of contract, as well as to third parties who come into contact with the company's work environment.

The scope includes all contexts in which work activities take place, including offices, business trips, events, meetings and digital environments.

Responsible for Policy implementation

The implementation of the Policy is overseen by the Human Resources & Organization Department, which coordinates operational activities, ensures compliance with procedures and manages, within its remit, the process of evaluating and processing reports.

The oversight of the Policy is ensured through the involvement of the competent company structures, in particular the Audit Department and the Supervisory Body pursuant to Legislative Decree 231/2001, as well as by a cross-functional network of dedicated representatives and committees, to ensure a consistent, effective and compliant application of the Group's governance system.

External national and international regulatory references of the Policy

- European Framework Agreement on Harassment and Violence in the Workplace (2007);
- CCNL Telecommunications – Articles 45 and 48;
- Interconfederal Agreement of January 25, 2016 on harassment and violence in the workplace;
- Asstel framework agreement – trade unions of January 16, 2019;
- Italian Civil Code – Art. 2043;
- Criminal Code – Articles 594, 595, 604-bis, 609-bis, 612, 612-bis, 660;
- Legislative Decree no. 145 of May 30, 2005;
- Law no. 38 of April 23, 2009;
- Legislative Decree June 15, 2015, no. 81;
- Law no. 179 of November 30, 2017 and Legislative Decree no. 24 of March 10, 2023 (whistleblowing);
- Law no. 69 of July 19, 2019.

ESRS affected by the Policy

S1-1

IROs affected by the policy

5, 20, 35, 38.

8. Waste management

Contents and objectives of the Policy

The Procedure defines the framework for the management of waste produced by company activities, indicating rules and responsibilities to ensure management in accordance with current environmental legislation and consistent with the Organization, Management and Control Model pursuant to Legislative Decree 231/2001. The document governs the entire life cycle of waste, from classification to its transfer to authorized parties, ensuring a structured and homogeneous operational approach throughout the territory, aimed at the prevention of environmental, health and safety risks.

The Procedure orients company processes towards correct management of waste streams, ensuring compliance with mandatory legislative obligations and promoting, where possible, the prevention, reuse, and recycling of the waste produced, in line with the principles of the circular economy.

The main objectives of the Procedure are:

- ensure compliance with applicable environmental legislation on waste management;
- ensure the correct identification, classification and traceability of the waste produced;
- prevent environmental impacts and health and safety risks related to non-compliant management;
- reduce the production of waste and promote reuse and recycling, also through the extension of the useful life of the goods;
- integrate sustainable waste management criteria into procurement processes and into the selection and management of suppliers;
- promote responsible behavior within the Organization through training and awareness-raising initiatives;
- support the continuous improvement of environmental performance through monitoring, control and audits;

In addition, in order to strengthen its commitment to the circular economy, TIM has defined additional guiding principles on resource management and waste management, which include, among other things:

- the implementation of action plans aimed at reducing the production of waste and increasing the useful life of goods through, for example, the supply of regenerated products for customer service and the sale of reconditioned products;
- the promotion of recycling programs for company equipment (e.g. PCs and mobile phones) favoring their internal reuse or donation for social purposes;
- the selection of suppliers that maximize the recovery of the waste delivered and prioritize the reuse of rare resources and precious materials.

Scope of the Policy

The Policy is addressed to TIM S.p.A. and Telecom Italia Sparkle S.p.A. and to all company departments that, in different capacities, participate in the management of waste deriving from their activities carried out on the national territory.

It constitutes a reference framework for the other group companies operating in the Domestic sector, which can transpose its principles or use it as a basis for the definition of their internal procedures, in compliance with the applicable regulations.

It applies to activities carried out at company offices, local units, construction sites and infrastructures and involves employees, collaborators and third parties operating on behalf of the company, including contractors and suppliers whose activities may generate waste or affect waste management processes.

Responsible for Policy implementation

The implementation is entrusted to the competent company Functions, each for their own responsibilities, with the coordination of the Health, Safety & Environment (HSE) Function, which ensures the overall supervision of the Procedure, the interpretative and application support and the monitoring of the correct implementation. The Operational Functions and territorial structures ensure the application of the provisions in their respective activities, while the Procurement Department ensures the qualification and monitoring of the suppliers in charge and compliance with regulatory requirements along the value chain.

External national and international regulatory references of the Policy

- Directive 2008/98/EC on waste and Decision 2014/955/EU;
- Legislative Decree April 3, 2006, no. 152 as amended – Environmental regulations, Part IV;
- Ministerial Decree of December 17, 2009 – Establishment of the waste traceability control system, pursuant to Article 189 of Legislative Decree no. 152/2006 and Article 14-bis of Decree-Law no. 78/2009, converted with amendments by Law no. 102/2009 as amended.
- Ministerial Decree no. 145 of April 1, 1998 – Waste identification forms;
- Ministerial Decree no. 148 of April 1, 1998 – Waste loading and unloading registers;
- Commission Regulation (EU) no. 1357/2014 – Classification of hazardous waste;
- Law no. 68 of May 20, 2015 – Crimes against the environment;
- Directive (EU) 2022/2464 – Corporate Sustainability Reporting Directive (CSRD).

ESRS affected by the Policy

E5-1

IROs affected by the Policy

28; 37.

9. Artificial Intelligence

Contents and objectives of the Policy

The Guidelines define the principles and framework that guide the development, use and purchase of Artificial Intelligence Systems by the TIM Group, in line with the values expressed in the Code of Ethics and Conduct and with the applicable regulatory framework. The Guidelines are part of the Group's governance system and accompany the technological evolution of the organization, favoring an adoption of AI that is aware, responsible, and aligned with the main evolutionary trends in the sector.

The document aims to ensure that Artificial Intelligence is used as a lever for innovation, efficiency and competitiveness, while preventing ethical, legal, social and reputational risks associated with the use of such technologies. In this context, the guidelines contribute to protecting the reliability and reputation of the Group, ensuring that the adoption of AI takes place in compliance with the fundamental rights of people, the security of solutions, and the interests of the Company and its stakeholders.

The guidelines also provide a common reference for translating ethical principles into criteria and guidelines applicable to business processes, supporting the development and integration of AI solutions capable of generating value in the medium to long term, including in terms of service quality, sustainability and competitive positioning.

The main objectives are:

- define the ethical principles that guide the development, use and purchase of Artificial Intelligence Systems in the TIM Group;
- provide a regulatory and value framework to support the adoption of AI in business processes;
- encourage the use of AI consistent with the Group's innovation and competitiveness strategy, avoiding misalignments with the main technological trends in the sector;
- ensure safety, reliability and protection of the fundamental rights of people in the use of AI Systems;
- prevent and mitigate ethical, legal and reputational risks related to the use of Artificial Intelligence;
- promote a conscious, responsible and sustainable use of AI as an enabling technology for value creation.

Scope of the Policy

They apply to the Italian companies of the TIM Group and constitute a reference framework for foreign companies, in compliance with applicable local regulations. The guidelines address a broad and transversal perimeter of subjects involved, in different ways, in the development, use or purchase of Artificial Intelligence Systems, including members of corporate bodies, management, employees, external collaborators and, where required by the company's procedural system, third parties who have business relations with the Group.

The principles and guidelines contained in the guidelines are applied in all activities that involve the development, use, or purchase of AI Systems, regardless of the business function involved, the operational context, or the type of solution adopted.

Responsible for Policy implementation

The Artificial Intelligence Guidelines are approved by TIM's Board of Directors, which ensures consistency with the business strategy and plays a strategic role, receiving periodic disclosure on the main activities carried out in the AI field.

The Group Committee for Artificial Intelligence, chaired by the CEO, represents the core of AI governance and directs the strategy for the adoption of Artificial Intelligence Systems in the Group.

The Control and Risk Committee supports the Board of Directors in overseeing the Internal Control System and Risk Management System with reference to AI Systems.

The relevant company functions contribute to the implementation of the guidelines within the scope of their respective responsibilities.

External national and international regulatory references of the Policy

- Charter of Fundamental Rights of the European Union;
- Regulation (EU) 2024/1689 of the European Parliament and of the Council, laying down harmonized rules on Artificial Intelligence (AI Act);
- European Commission Guidelines of November 25, 2021 Ethics by Design and Ethics of Use Approaches for Artificial Intelligence;
- Regulation (EU) 2016/679 of the European Parliament and of the Council (general data protection regulation – GDPR);
- directive 2002/58/EC of the European Parliament and of the Council (e-Privacy);
- UNESCO – Recommendation on the Ethics of Artificial Intelligence;
- GSMA – The AI Ethics Playbook. Implementing ethical principles into everyday business;
- Council of Europe – Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law.

ESRS affected by the Policy

G1-1

IROs affected by the Policy

29

10. Commitment to environmental sustainability

Contents and objectives of the Policy

The Policy defines the principles and guidelines for managing the environmental impacts generated by the Group's activities, with the aim of structurally integrating environmental sustainability into decision-making and operational processes, in line with current regulations, international standards, and company strategic guidelines along the value chain.

The Policy guides the management of infrastructure, operational processes, logistics and supply chain towards the prevention and reduction of environmental impacts, promoting the efficient use of natural resources and the reduction of greenhouse gas emissions, with a view to continuous improvement of environmental performance.

The Policy promotes the integration of environmental commitments into investment, procurement, and operational management processes, ensuring a consistent and homogeneous approach within the Group. Implementation is supported by management, monitoring and reporting systems for environmental performance, and by training and awareness-raising initiatives.

The main objectives of the Policy are to:

- ensure compliance with current environmental laws and regulations and reference standards;
- adopt environmental and energy management systems aimed at efficiency in resource use and reduction of the environmental impacts of infrastructures, also through advanced technologies;
- contribute to the reduction of direct and indirect emissions, promoting the use of energy from renewable sources and the progressive reduction of fossil fuels;
- develop and invest in solutions, products and services with low environmental impact, to support the transition to low carbon emissions models;
- integrate environmental sustainability criteria in the selection and management of suppliers and partners and in the assessment of environmental risks along the supply chain, adopting shared improvement actions.

The objectives of the Policy also contribute to the pursuit of the United Nations Sustainable Development Goals (SDGs), with respect to which the TIM Group recognizes its responsibilities and guides coherent policies, initiatives and behavior: SDG 7 – Clean and accessible energy; SDG 9 – Industry, innovation and sustainable infrastructure; SDG 11–Sustainable Cities and Communities; SDG 12–Responsible consumption and production; SDG 13–Fight against climate change.

Scope of the Policy

It applies to TIM S.p.A., the TIM Foundation and the Italian companies of the TIM Group. For the Group's foreign companies and for Istituto TIM, it constitutes a reference framework for the definition and updating of their respective environmental policies and procedures, in compliance with local regulations.

It is aimed at all company functions and operational structures whose activities may generate environmental impacts, direct or indirect, and applies to the entire value chain, including upstream (e.g. suppliers and procurement) and downstream (e.g. commercial offer, services and customer relations) activities, in all geographic areas of the Group's operations.

Responsible for Policy implementation

The implementation is entrusted to the company functions involved in the management of environmental impacts, each for their own skills and responsibilities. In particular, the Corporate Communication & Sustainability Department ensures the overall supervision of the Policy and the monitoring of its implementation, while the competent operational functions, the technical functions of infrastructure management, and the Procurement Department contribute to the implementation of the environmental guidelines in their respective activities.

External regulatory references of the Policy

- Legislative Decree 152/2006 as amended – Consolidated Law on Environmental Matters;
- UNI EN ISO 14001 – Environmental management systems;
- UNI CEI EN ISO 50001 – Energy management systems;
- GHG Protocol – Standard for accounting and reporting of greenhouse gases;
- ISO 14064 – Greenhouse gases – Specifications for the quantification and reporting of emissions;
- UNFCCC – United Nations Framework Convention on Climate Change;
- Paris Agreement – International agreement on combating climate change;
- Directive 92/43/EEC – Habitats Directive;
- Directive 2009/147/EC – Birds Directive;
- EU Circular Economy Package Directives – Waste prevention, reuse, recycling and efficient use of resources;
- Sustainable Development Goals (SDGs) – United Nations 2030 Agenda;
- Directive (EU) 2022/2464 – Corporate Sustainability Reporting Directive (CSRD).

ESRS affected by the Policy

E1-2; E5-1.

IROs affected by the Policy

7; 9; 13; 18; 23; 28; 31; 37.

11. 231 Organizational Model

Contents and objectives of the Policy

The Organization, Management and Control Model pursuant to Legislative Decree 231/2001 defines the framework adopted by TIM to prevent the commission of crimes carried out in the interest or for the benefit of the Company and which may result in the administrative liability of the entity. The Model is an integral part of the governance system and the internal control system and risk management system and is consistent with the values and lines of conduct expressed in the code of ethics and conduct.

The Model orients the organization towards a management of business activities based on legality, fairness and responsibility, promoting awareness of the consequences deriving from illegal conduct and combating any conduct that does not comply with current laws and the ethical principles adopted. In this context, the Model is part of an integrated cross-compliance approach, taking into account the other control systems and controls adopted by the Company.

The main objectives of the Model are:

- prevent and mitigate the risks of committing crimes related to corporate activities, reducing the Company's exposure to sanctioning risks;
- strengthen the awareness of the corporate bodies, management, employees, and third parties working on behalf of the Company regarding the responsibilities and consequences deriving from unlawful conduct;
- counter any unlawful conduct, regardless of the purposes pursued, as it is contrary to the laws in force, the values and the lines of conduct to which inspire TIM;;
- promote the adoption of behaviors that comply with the rules, control presides and guidelines of the Model;
- integrate the crime prevention system with the other tools and control models adopted by the Company, with a view to overall coordination and consistency.

Scope of the Policy

It applies to TIM S.p.A. and concerns all the subjects who operate within the scope of the Company's activities, in any capacity, including the members of the corporate bodies, management, employees, and third parties who act in the name and on behalf of the Company or who have significant relationships with it for the purposes of Decree 231.

The Model also constitutes a reference framework for TIM Group Companies, including foreign ones, which are inspired by it in the definition of their respective organization, management and control models or similar compliance systems, in compliance with applicable local regulations and operational requirements.

Responsible for Policy implementation

The Organization, Management and Control Model pursuant to Legislative Decree 231/2001 of TIM S.p.A. is adopted and updated by the Board of Directors of TIM S.p.A.

Supervision of the operation and compliance with the Model is entrusted to the Supervisory Body (SB), with autonomous powers of initiative and control, which verifies its effectiveness and takes care of its continuous monitoring and updating.

The management and the competent company functions contribute to the implementation of the Model within the scope of their respective responsibilities, ensuring its dissemination and effective application within the organization and in relations with third parties.

External national and international regulatory references of the Policy

- Legislative Decree no. 231 of June 8, 2001 – Administrative liability of entities;
- Confindustria guidelines for the construction of Organization, Management and Control Models;
- Legislative Decree March 10, 2023, no. 24 “Implementation of Directive (EU) 2019/1937 on the protection of persons who report violations of Union law and national regulatory provisions.”

ESRS affected by the Policy

G1-1

IROs affected by the Policy

2

12. Report on the remuneration policy and compensation paid

Contents and objectives of the Policy

The TIM Group Remuneration Policy defines the principles and guidelines governing remuneration and incentive systems, in line with the business strategy and the 2025-2027 Business Plan. The Policy constitutes a governance tool aimed at ensuring the consistency of the remuneration systems with the Group's strategic objectives and with the principles of sustainability, equity, and responsibility.

The Policy aims to support the involvement and motivation of people, promoting incentive systems that favor the achievement of clear and measurable performance objectives, the strengthening of a sense of responsibility and the improvement of productivity. In this context, the Policy promotes, where applicable, the integration of ESG criteria into remuneration systems, strengthening the connection between economic results and sustainability.

The Policy integrates risk management mechanisms related to incentive systems, providing for tools such as malus and clawback clauses, aimed at discouraging behavior inconsistent with the Group's values or results not correctly achieved, strengthening the link between incentive and responsible behavior.

The main objectives of the Policy are to:

- promote the creation of value for shareholders in the medium to long term, in line with the Business Plan;
- align the interests of management with those of the shareholders and with the Group's strategic objectives;
- ensure a balanced mix between short- and long-term incentive schemes;
- make the company attractive in the talent market, promoting attraction, motivation and retention of people;
- integrate, where applicable, economic-financial objectives and ESG criteria into remuneration and incentive systems;
- promote responsible behavior consistent with the Group's values;
- protect the principles of internal equity, including gender equity, and promote the involvement and engagement of people;
- safeguard consistency at Group level, taking into account the specificities of the reference markets.

Scope of the Policy

It applies to TIM S.p.A. and to the subsidiaries of the TIM Group, including foreign ones, and concerns, in particular, the members of the Administrative Bodies, the Managers with Strategic Responsibilities, the management, and the categories of personnel for which specific remuneration and incentive systems are provided. The application of the Policy to subsidiaries abroad takes place in compliance with current regulations and local market contexts, while safeguarding the consistency of the principles and guidelines at Group level.

Responsible for Policy implementation

The TIM Group Remuneration Policy is defined and approved by the Board of Directors, on the proposal of the Appointments and Remuneration Committee, and is subject to approval by the Shareholders' Meeting, in compliance with current legislation. The Appointments and Remuneration Committee supports the Board of Directors in monitoring the implementation of the Policy, verifying its consistency with the Group's business strategy, Business Plan and sustainability objectives. The CEO and the General Manager ensure the operational implementation of the Policy guidelines within the organization, with the support of the relevant company functions, in compliance with the governance and internal control system.

External national and international regulatory references of the Policy

- The Policy is adopted in accordance with the regulatory and self-regulatory framework applicable to listed companies and takes into account:
- Legislative Decree no. 58 of February 24, 1998 (Consolidated Law on Finance – TUF);
- Consob regulations applicable to listed issuers and remuneration disclosure;
- Directive (EU) 2017/828 (Shareholder Rights II);
- Corporate Governance Code of listed companies, to which TIM adheres.

ESRS affected by the Policy

S1-1

IROs affected by the Policy

17; 24; 35.

13. Human Resources and Equal Opportunity Policy**Contents and objectives of the Policy**

The Policy defines the principles and the reference framework that guide the commitment of the TIM Group in the management, enhancement, and development of its people, identifying the areas of intervention in the field of human resources and equal opportunities.

The Policy regulates working conditions, with particular reference to the protection of the health and safety of workers and the prevention of occupational diseases, through the assessment of risks and the adoption of principles, standards, and solutions recognized as best practices in terms of adequacy and effectiveness.

The Policy also addresses the organization of work, promoting the balance between professional and private life through the adoption of agile work as an integral part of the organizational model and through caring and corporate welfare initiatives. In this context, the Policy recognizes and respects the freedom of association and the right to collective bargaining, guaranteeing workers the possibility of forming and joining trade unions for the protection of individual and collective interests.

The Policy also governs the system of remuneration, adopting a fair and balanced system of remuneration, with fixed and variable components for the short and long term, which include the sustainability component, in order to attract, retain and motivate people.

The Policy promotes respect for people and diversity throughout the entire cycle of the employment relationship, combating all forms of discrimination in recruitment, remuneration, access to training, professional development, and career paths. In this context, the Policy promotes engagement and inclusion, ensuring the accessibility of systems, equipment, and workstations for all people, including those with disability.

The Policy also regulates the development and training of people through defined paths and targeted initiatives, aimed at consolidating professional skills, updating, and retraining.

Finally, the Policy includes personal data protection for individuals within the Group, providing for the adoption of a structured organizational model aimed at overseeing the correct application of the relevant legislation, through organizational and technical measures suitable for guaranteeing the confidentiality and security of personal data.

The main objectives of the Policy are to:

- improve the management and promotion of human resources in the Group;
- illustrate the principles that inspire the actions of the group companies so that they are a shared practice within the Organization and in relations with external partners;
- promote engagement, respect and inclusion, ensuring an inclusive working environment and combating all forms of discrimination throughout the entire employment relationship cycle;
- promote the balance between professional and private life;
- support the development of skills and the continuous training of people;
- adopt a fair and balanced system of remuneration;
- protect health and safety at work;
- recognize and respect freedom of association and the right to collective bargaining;
- ensure personal data protection of Group persons.

Scope of the Policy

It applies to TIM S.p.A. and to all TIM Group companies, in Italy and abroad, and is addressed to all persons working on behalf of the Group, in any capacity, regardless of the role held, the place of work, the type of contract, or the geographical area of operation.

The principles and provisions of the Policy are applied throughout the entire cycle of the employment relationship, from the selection and hiring phase until the termination of the relationship, and constitute a common reference for the adoption of consistent behaviors in terms of resource management and equal opportunities within the Group.

Responsible for Policy implementation

The implementation of the Human Resources and Equal Opportunities Policy is entrusted to the competent company Functions, each for their own responsibilities, in line with the Group's organizational model. The overall coordination is ensured by the Human Resources Function, which oversees the application of the Policy, provides interpretative and operational support to the structures involved and monitors its correct implementation.

The operational Functions and territorial structures are responsible for the implementation of the provisions of the Policy in the activities of their respective competence, ensuring their integration into the people management processes and organizational practices adopted at Group level.

External national and international regulatory references of the Policy

The Human Resources and Equal Opportunities Policy is in line with the principles of the United Nations Global Compact to which TIM has adhered, in particular with reference to respect for human rights, working conditions, and the promotion of equal opportunities.

ESRS affected by the Policy

S1-1

IROs affected by the Policy

5; 15; 17; 20; 22; 24; 26; 35; 36; 38.

14. Health and Safety at Work

Contents and objectives of the Policy

The Policy defines the principles and framework that guide TIM's commitment to protecting the health and safety of people in the workplace, in accordance with the provisions of UNI EN ISO 45001. The Policy constitutes a guiding tool for the systematic management of health and safety issues, promoting safe and healthy working conditions and the well-being of people throughout the scope of the operations.

The Policy regulates the prevention of accidents, occupational diseases and other incidental events, through the identification, evaluation and control of risks to the health and safety of workers. In this context, the Policy promotes the elimination of risks at source or, where not possible, their minimization, including through the adoption of principles, standards and solutions recognized as best practices.

The Policy also addresses aspects related to the design, construction and management of property and work environments, ensuring adequate conditions of safety, health and livability, as well as compliance with legal requirements and other applicable mandatory requirements. It promotes an approach aimed at the continuous improvement of occupational health and safety performance, also in relation to the evolution of the regulatory environment, the business, and the technologies used.

Finally, the Policy enhances the involvement and empowerment of workers in health and safety management, promoting the dissemination of a culture of prevention through information, training and education activities, as well as the consultation and participation of workers and their representatives.

The main objectives of the Policy are to:

- promote the reduction of accidents, occupational diseases and other incidental events through the adoption of prevention and protection measures and the verification of their adequacy and effectiveness;
- ensure full compliance with legal requirements and other mandatory requirements regarding health and safety at work;
- ensure safe and healthy working conditions, also with reference to the design, construction and management of property;
- assess the risks to the health and safety of workers, favoring their progressive elimination or minimization through the adoption of principles, standards and solutions recognized as best practices;
- promote the continuous improvement of occupational health and safety performance;
- promote the development of an organizational culture of health and safety through the involvement, consultation and active participation of workers;
- define and periodically review the objectives in line with the principles of the Policy.

Scope of the Policy

The Occupational Health and Safety Policy applies to TIM S.p.A. and concerns all persons who operate within the scope of the Company's activities, in any capacity, as well as third parties involved in the performance of operational activities under the responsibility of TIM, including workers of suppliers and contractors employed in the performance of such activities.

The principles and provisions of the Policy are applicable in all work contexts and throughout the entire perimeter of the Company's operations.

Responsible for Policy implementation

The implementation of the Occupational Health and Safety Policy is entrusted to the Health, Safety & Environment (HSE) Department, which ensures overall oversight of occupational health and safety and prevention of activities, as well as the implementation support and monitoring the proper implementation of the Policy.

The Real Estate Department is responsible for the implementation of occupational health and safety requirements with reference to company property, ensuring the compliance of structures and work environments with the applicable requirements as well as the implementation and maintenance of the Occupational Health and Safety Management System.

External national and international regulatory references of the Policy

The Policy is inspired by the international standard ISO 45001 on occupational health and safety management systems.

ESRS affected by the Policy

S1-1; S2-1.

IROs affected by the Policy

15; 38.

15. Information Security

Contents and objectives of the Policy

The Policy defines the principles and commitments of the TIM Group for the protection of company information and to ensure its correct, secure, and responsible use. Information is a strategic asset for the operation of business processes and for the provision of services; its protection is therefore essential to ensure business continuity, the reliability of services and the protection of stakeholders.

The Policy establishes a structured framework for the management of information security, identifying roles, responsibilities, criteria and operating rules for their protection. In this context, it regulates the methods of classification, processing, and protection of information, with the aim of guaranteeing its confidentiality, integrity, and availability, taking into account the value of the information and the consequences that any security incidents may generate.

The Policy is aimed at preventing and mitigating risks related to computer system vulnerabilities, unauthorized access, loss or compromise of data, as well as events that may result in service interruptions or impacts on business continuity. The information covered by the Policy includes any aggregation of data that has value and interest for the Group, regardless of the form, support or methods of processing.

In this context, the Policy promotes an integrated approach to information security, which includes the definition of processes, priorities and responsibilities, the monitoring of business continuity and the protection of strategic information, personal data and corporate image, helping to reduce legal, economic and reputational risks arising from security incidents or non-compliance with applicable regulations.

The Policy also enhances the role of people in information security, promoting training and awareness-raising activities and ensuring the monitoring, management, and analysis of security incidents, also with a view to continuous improvement of the measures adopted. In this framework, the Policy also supports the secure evolution of digital solutions and collaboration models with technology partners, favoring consistent security practices throughout the ecosystem.

The main objectives of the Policy are to:

- define rules, processes, roles and responsibilities for information security, ensuring management structured and coordinated management at Group level;
- ensure an adequate level of confidentiality, integrity and availability of information, proportionate to its business value and potential impacts on customers, employees and business activities;
- protect the safety of the services and the expected levels of business continuity, to protect customers, end users and business operations;
- protect strategic information, personal data and corporate image as a matter of priority;
- effectively prevent and manage security incidents, reducing their operational, legal and economic impacts;
- promote training and awareness of cyber risks and individual responsibilities among staff;
- promote the continuous improvement of the security measures adopted;
- In support of the Policy, TIM has equipped itself with an information security management system, aimed at ensuring the governance of processes and activities dedicated to the protection of information assets.

Scope of the Policy

It applies to TIM S.p.A. and the TIM Group Companies in the Domestic field and constitutes a reference for the Group's foreign companies, which adopt its principles in compliance with local regulations. The Policy concerns the protection of company information and the assets used for its processing throughout the entire information life cycle, regardless of the operating methods adopted, the technologies used, or the use of third parties.

Responsible for Policy implementation

The implementation of the Policy is supported by a governance model that ensures coordinated and consistent management of information security with a clear assignment of roles and responsibilities.

The Chief Security Office Function plays a leading and governing role in the information security system, ensuring the overall coordination and consistency of security initiatives at Group level. The company functions of the Domestic perimeter are responsible for the operational implementation of the Policy, the application of security measures, risk management and the protection of information processed within their processes, systems and assets.

External national and international regulatory references of the Policy

- ISO/IEC 27000:2018 - Information technology - Security techniques - Information security management systems - Overview and vocabulary;
- ISO/IEC 27001:2022 - Information security, cybersecurity and privacy protection;
- Information security management systems - Requirements;
- ISO/IEC 27002:2022 - Information security, cybersecurity and privacy protection;
- Information security controls;
- ISO/IEC 27035-1:2023 Information technology - Information security incident management - Part 1: Principles and process; Part 2: Guidelines to plan and prepare for incident response; Part 3: Guidelines for ICT incident response operations;

ESRS affected by the Policy

S1-1; S4-1

IROs affected by the policy

1; 3; 16; 26; 27

16. Framework for the Application of Personal Data Protection Legislation**Contents and objectives of the Policy**

The Policy defines the framework adopted by the TIM Group to ensure that personal data processing is carried out in compliance with current legislation and the fundamental rights and freedoms of natural persons, in line with the guidelines of the corporate governance system.

The document establishes the principles and commitments that guide the organization in the correct and responsible management of personal data, identifying the general criteria to be followed in data collection, use, storage and protection activities. In this framework, the Policy provides common guidance for the management of personal data processed in the context of relations with customers, employees, suppliers, partners, corporate bodies, and other stakeholders, promoting consistent behavior and appropriate safeguards to ensure lawfulness, fairness, transparency, security, and accountability of processing.

The management system promotes an approach to personal data protection based on the principles of lawfulness, fairness and transparency, as well as information security, the empowerment of those involved and the integration of data protection into business processes and information systems, also with a view to risk prevention.

The main objectives of the Policy are to:

- ensure compliance with the legislation on personal data protection and the principles of the GDPR;
- protect the fundamental rights and freedoms of data subjects in relation to personal data processing;
- ensure a homogeneous, coherent and structured governance of processing within the Group;
- prevent risks related to non-compliant uses, losses, unauthorized access or personal data breaches;
- strengthen an approach of empowerment and awareness in the management of personal data, in support of stakeholder trust.

This document concerns the correct processing of personal data of all the company's stakeholders, defining the methods of corporate monitoring and the corresponding responsibilities, as well as the technical/administrative measures for data protection.

With regard to TIM workers (employees and those treated as such), the document draws attention to the regulations and procedures to be observed when processing the personal data of the abovementioned parties during the phase prior to the establishment of the working relationship, during the course of the same, and in the termination phase.

Regarding customers, the document refers to the regulations and procedures to be observed in the processing of their personal data with reference, among other things, to marketing and sales activities, profiling, loyalty, market research, trials, prevention and combating late payments and fraud, as well as to the specific provisions provided for electronic communications (e.g. regarding traffic data and geolocation data, cookies).

Scope of the Policy

It applies to TIM S.p.A. and to the TIM Group Companies, both Italian and foreign, and is aimed at company departments and individuals who, within the Group's organization, are involved in personal data processing.

The principles of the Policy are applied in the different contexts of personal data processing managed by the Group, including those relating to customers, employees, suppliers, partners, corporate bodies and other subjects affected by the processing carried out by the Group.

Responsible for Policy implementation

The overall supervision of the Policy at Group level is entrusted to TIM's Legal, Regulatory & Tax Department, which approves it according to the corporate governance system, updates it, and coordinates its implementation.

Within the Legal, Regulatory & Tax Department, TIM's Privacy Department operates, which, as part of the role of the data protection officer (dpo), is responsible for directing, coordinating and overseeing the correct application of the legislation on personal data protection at Group level, providing specialist support to the company structures involved.

The implementation of the Policy in the TIM Group is ensured by TIM's internal privacy delegates and by the Privacy Coordinations of the Group companies, which operate within the scope of their respective competences and responsibilities in conjunction with TIM's Privacy Function.

External national and international regulatory references of the Policy

- Regulation (EU) 2016/679 – general data protection regulation (GDPR);
- Legislative Decree June 30, 2003, n. 196 and subsequent amendments – Code on personal data protection;
- Legislative Decree no. 101 of August 10, 2018 – Adaptation of national legislation to the GDPR.

ESRS affected by the Policy

S1-1; S4-1

IROs affected by the Policy

1; 26

17. Tax Strategy**Contents and objectives of the Policy**

The document on the Tax Strategy defines the principles and guidelines adopted by TIM in the management of taxation, in line with the Code of Ethics and Conduct, the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, and the Group's governance and internal control system.

The tax strategy orients the Group towards tax management based on fairness, transparency and compliance with tax regulations in the countries in which it operates, promoting responsible behavior and a collaborative dialogue with the tax authorities. In this context, TIM defines the level of acceptable tax risk and adopts an approach aimed at preventing and managing potential disputes in a timely manner, reserving the possibility of supporting reasoned interpretive positions when deemed adequately grounded.

The tax strategy also provides for the adoption of adequate control and monitoring tools and the involvement of the competent company functions in tax-relevant processes, while promoting the dissemination of the tax culture within the organization through information and training activities.

The main objectives are:

- disseminate, starting from the top of the company, the principles of tax conduct within the organization;
- operate in compliance with tax laws and regulations in the countries where TIM is present, ensuring the monitoring of regulatory developments;
- promote transparent and collaborative relationships with the tax authorities;
- define and oversee a propensity for tax risk consistent with the business strategy;
- adopt appropriate control and monitoring tools to ensure the tax compliance of business processes;
- ensure the involvement of the competent functions in the control presidencies;
- promote the training and awareness of personnel involved in tax-relevant activities.

Scope of the Policy

Applies to all TIM Group companies. In Brazil, the group companies have adopted their own tax policy, consistent with the addresses defined by the Group and the local regulatory context.

Responsible for Policy implementation

The Tax Strategy is approved by the Board of Directors, after an investigation by the Control and Risk Committee, and is updated in the event of significant changes in the regulatory, strategic, or operational context.

The Tax Department within the Legal, Regulatory and Tax Department ensures the implementation of the tax strategy and its operational oversight, coordinating monitoring activities and ensuring the consistency of the tax approach with the guidelines defined at Group level.

External national and international regulatory references of the Policy

The Tax Strategy is defined in line with international guidelines and best practices on tax governance developed by the Organisation for Economic Co-operation and Development (OECD). In particular, the document refers to:

- OECD, "Co-operative Compliance – A Framework: From Enhanced Relationship to Co-operative Compliance";
- OECD, "Guidelines on Building Better Tax Control Frameworks".

ESRS affected by the Policy

G1-1

IROs affected by the Policy

2

18. Whistleblowing

Contents and objectives of the Policy

The procedure defines the framework for reporting and managing violations of laws and regulations, the code of ethics and conduct, the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, as well as internal policies and procedures.

The document is part of the Group's governance and internal control system and is an essential tool for the prevention of unlawful conduct, including violations regarding anti-corruption, competition, human rights and ethical standards, as well as for strengthening stakeholder confidence.

The procedure governs the principles and general guidelines relating to reporting channels, reporting management methods and whistleblower protection measures, ensuring the confidentiality of information, the protection of identity and the prevention of any form of retaliation, in compliance with the applicable regulatory framework. In this way, it contributes to strengthening the transparency of reporting processes and the effectiveness of control measures, favoring the timely emergence of non-compliant conduct that could generate legal, operational, economic or reputational risks.

Through the whistleblowing system, the Group promotes a corporate culture based on integrity, legality, and responsibility, encouraging responsible reporting of irregular or illegal behavior and supporting the protection of people's fundamental rights, including along the value chain.

The main objectives of the procedure are:

- encourage responsible reporting of illegal, irregular or non-compliant behavior, guaranteeing the confidentiality of the identity of the whistleblower and the people involved;
- ensure the protection of whistleblowers against any form of retaliation, discrimination or penalties resulting from the reporting;
- ensure an impartial, timely and structured management of the reports received, in compliance with the applicable regulatory provisions;
- strengthen measures to prevent the risks of non-compliance, including violations of regulations, ethical standards and human rights;
- contribute to the protection of the reputation and reliability of the TIM Group towards stakeholders;
- support the spread of a culture of legality and integrity within the organization.

Scope of the Policy

It applies to TIM S.p.A. and TIM Group subsidiaries, excluding listed and foreign companies. It also constitutes a reference for the TIM Foundation and for the other subsidiaries of the Group not included in the scope of application, which can implement it in compliance with specific and/or local regulations, processes, and organizational structures.

The recipients of the Procedure are the top management and members of the corporate bodies and the Supervisory Body of TIM S.p.A. and of the subsidiaries; employees, former employees and candidates for job positions, shareholders, customers of TIM and of subsidiaries, as well as partners, suppliers (also under contracts/subcontracting), consultants, collaborators in carrying out their work activities at TIM and/or the subsidiaries, who have information on violations as defined in this procedure.

The provisions of the Procedure apply to activities carried out within the Group's operating perimeter, including those related to the value chain, insofar as they are compatible with the respective regulatory and contractual contexts.

Responsible for Policy implementation

The responsibility for the management process of reports is attributed to the Supervisory Body of TIM S.p.A. and its subsidiaries, which ensures the supervision of the whistleblowing system and the correct implementation of the Procedure, in accordance with the Organization, Management and Control Model adopted by the Group.

For the purposes of the management and investigation of the reports received, the Supervisory Body works in coordination with the TIM Audits Function and can avail itself of the relative support for the performance of verification and in-depth activities, in compliance with the applicable regulatory provisions and current information flows.

The Supervisory Body ensures that the analysis and evaluation of reports are carried out according to criteria of confidentiality, impartiality and independence and may, where necessary, make use of internal specialist skills or external professional support, in order to acquire the information necessary for the correct management of reports.

External national and international regulatory references of the Policy

- Directive (EU) 2019/1937 on the protection of persons reporting breaches of Union law;
- Legislative Decree no. 24 of March 10, 2023, transposing Directive (EU) 2019/1937;
- Legislative Decree no. 231 of June 8, 2001, on the administrative liability of entities;
- Regulation (EU) 2016/679 (general data protection regulation – GDPR);
- Legislative Decree June 30, 2003, no. 196 (Code regarding personal data protection) and subsequent amendments and additions;
- Decree-Law no. 21 of March 15, 2012, converted into Law no. 56 of May 11, 2012, as amended, on special powers of the State (so-called golden power);
- Decree-Law no. 105 of September 21, 2019, converted into Law no. 133 of November 18, 2019, on the Perimeter of National and Cyber Security;
- Decrees of the President of the Council of Ministers (DPCM) applicable to the exercise of special powers and protection of information and strategic infrastructures.

ESRS affected by the Policy

S1-1

IROs affected by the Policy

2; 4; 38

ESRS Table of Contents

Disclosure Requirement IRO-2 - Disclosure requirements in ESRS covered by the company's sustainability statement

[56]; [57]; [59]

In accordance with the applicable regulatory provisions, the following is a list of the disclosure obligations included in the 2025 Sustainability Reporting, identified on the basis of the double materiality analysis. For the purposes of selecting the information reported, the obligations relating to the topics "ESRS E2 – Pollution", "ESRS E3 – Marine Waters and Resources" and "ESRS E4 – Biodiversity and Ecosystems" were excluded, as they were assessed as not material.

Climate change was assessed as material following the double materiality analysis; therefore, the disclosure obligations provided for by ESRS E1 "climate change" are subject to reporting.

Material impacts, risks, and opportunities (IRO) were identified by applying the criteria and thresholds described in section 3.2 "Material issues and relevance of information" of ESRS 1. Each identified IRO was subsequently associated with the ESRS topics and sub-topics indicated in Appendix RA 16 of ESRS 1, in order to determine the specific information to be disclosed. For further details, please refer to table IRO-1 "Description of the process to identify and evaluate the material impacts, risks and opportunities."

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¹⁰ Paragraphs (datapoint) for which TIM does not provide disclosure as they are subject to the possibility of gradual introduction

¹¹ Disclosure requirements for which TIM does not provide disclosure as they are subject to the possibility of gradual introduction

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The following table shows the mapping between the datapoints of the Sustainability Reporting and the corresponding disclosure obligations provided for by additional European Union regulations, in addition to the CSRD, such as the sustainable finance Disclosure Regulation (SFDR), the "Capital Requirements Regulation" (Third Pillar), "the Benchmarks Regulation", and "European climate legislation". The table is intended as a regulatory link and allows you to identify the interrelationships between ESRS and other EU regulatory frameworks. For the obligations and datapoints reported, the page number of the reporting is indicated; if the paragraph is not subject to reporting, the page reference is not provided.

Paragraph and corresponding Disclosure Requirement.	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Annex 1, Table 1, Indicator number 13		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II		120
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Commission Delegated Regulation Commission (EU) 2020/1816, Annex II		120
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Annex 1, Table 3, Indicator number 10				125
ESRS 2 SBM-1 Engagement in activities related to fossil fuel activities, paragraph 40 (d) i)	Annex 1, Table 1, Indicator number 4	Article 449-bis of Regulation (EU) no. 575/2013; implementing regulation (EU) 2022/2453 of the Commission (6), Table 1 - Qualitative information on environmental risk and Table 2 - Qualitative information on social risk	Commission Delegated Regulation (EU) 2020/1816, Annex II		-
ESRS 2 SBM-1 Engagement in activities related to chemical production paragraph 40 (d) ii)	Annex 1, Table 2, Indicator number 9		Commission Delegated Regulation (EU) 2020/1816, Annex II		-
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii)	Annex 1, Table 1, Indicator number 14		Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818 (7) and Annex II of Delegated Regulation (EU) 2020/1816		-
ESRS 2 SBM-1 Engagement in activities related to cultivation and production of tobacco paragraph 40 (d) iv)			Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816		-
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Article 2(1) of Regulation (EU) 2021/1119	-

Paragraph and corresponding Disclosure Requirement.	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS E1-1 Companies excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 1: Bank portfolio — Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and remaining duration	Article 12, paragraphs 1 d) to g), and paragraph 2, of Delegated Regulation (EU) 2020/1818		-
ESRS E1-4 GHG emission reduction targets, paragraph 34	Annex 1, Table 2, Indicator number 4	Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 3: Bank portfolio — Indicators of potential transition risk related to climate change: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		-
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Annex 1, Table 1, Indicator number 5 and Annex 1, Table 2, Indicator number 5				186
ESRS E1-5 Energy consumption and mix, paragraph 37	Annex 1, Table 1, Indicator number 5				186
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Annex 1, Table 1, Indicator number 6				187
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Annex I, Table 1, indicators no. 1 and 2	Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 1: Bank portfolio — Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and remaining duration	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		188
ESRS E1-6 Intensity of gross GHG emissions, paragraphs 53 to 55	Annex 1, Table 1, Indicator number 3	Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 3: Bank portfolio — Indicators of potential transition risk related to climate change: alignment metrics	Article 8(1) of Delegated Regulation (EU) 2020/1818		193 , 194
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Article 2(1) of Regulation (EU) 2021/1119	194
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		phase-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)		Article 449-bis of Regulation (EU) no. 575/2013; points 46 and 47 of the Commission's Implementing Regulation (EU) 2022/2453; Model 5: Bank portfolio — Indicators of potential transition risk related to climate change: exposures subject to physical risk			phase-in
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)					phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449-bis of Regulation (EU) no. 575/2013; point 34 of the Commission's Implementing Regulation (EU) 2022/2453; Model 2: Bank portfolio — Indicators of potential transition risk related to climate change: loans secured by real estate — Energy efficiency of collateral			phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Annex 1, Table 1, Indicator number 8; Annex 1, Table 2, Indicator number 2; Annex 1, Table 2, Indicator number 1; Annex 1, Table 2, Indicator number 3				-
ESRS E3-1 Water and marine resources, paragraph 9	Annex 1, Table 2, Indicator number 7				-
ESRS E3-1 Dedicated policy, paragraph 13	Annex 1, Table 2, Indicator number 8				-
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Annex 1, Table 2, Indicator number 12				-
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Annex 1, Table 2, Indicator number 6.2				-
ESRS E3-4 Total water consumption in m3 compared to net revenue on own operations, paragraph 29	Annex 1, Table 2, Indicator number 6.1				-
ESRS 2 IRO-1 – E4 paragraph 16, letter a point i)	Annex 1, Table 1, Indicator number 7				-

Paragraph and corresponding Disclosure Requirement.	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS 2 IRO-1 — E4 paragraph 16, letter b	Annex 1, Table 2, Indicator number 10				-
ESRS 2 IRO-1 — E4 paragraph 16, letter c	Annex 1, Table 2, Indicator number 14				-
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24, letter b	Annex 1, Table 2, Indicator number 11				-
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24, letter c	Annex 1, Table 2, Indicator number 12				-
ESRS E4-2 Policies to address deforestation, paragraph 24, letter d	Annex 1, Table 2, Indicator number 15				-
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Annex 1, Table 2, Indicator number 13				199
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Annex 1, Table 1, Indicator number 9				199
ESRS 2 – SBM3 – S1 Risk of incidents of forced labor, paragraph 14, letter f	Annex 1, Table 3, Indicator number 13				201
ESRS 2 – SBM3 – S1 Risk of incidents of child labor, paragraph 14, letter g	Annex 1, Table 3, indicator no. 12				201
ESRS S1-1 Human rights policy commitments, paragraph 20	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator number 11				202
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 21			Commission Delegated Regulation (EU) 2020/1816, Annex II		202
ESRS S1-1 processes and measures for preventing trafficking in human beings, paragraph 22	Annex 1, Table 3, Indicator number 11				202
ESRS S1-1 workplace accident prevention policy or management system, paragraph 23	Annex 1, Table 3, Indicator number 1				202
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	Annex 1, Table 3, indicator no. 5				204
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 b) and c)	Annex 1, Table 3, indicator no. 2		Commission Delegated Regulation (EU) 2020/1816, Annex II		222
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Annex 1, Table 3, Indicator no. 3				222
ESRS S1-16 Unjust gender pay gap, paragraph 97 a)	Annex 1, Table 1, Indicator no. 12		Commission Delegated Regulation (EU) 2020/1816, Annex II		223
ESRS S1-16 Excess pay gap in favor of the CEO, paragraph 97 b)	Annex 1, Table 3, Indicator no. 8				223
ESRS S1-17 Incidents related to discrimination, paragraph 103 a)	Annex 1, Table 3, Indicator no. 7				224
ESRS S1-17 Failure to observe the United Nations Guiding Principles on Business and Human Rights and OECD, paragraph 104, letter a)	Annex 1, Table 1, Indicator number 10 and Annex 1, Table 3, Indicator number 14		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818		224
ESRS 2 SBM-3 – S2 Severe risk of child labor or forced labor in the value chain, paragraph 11 b)	Annex 1, Table 3, indicators no. 12 and 13				225
ESRS S2-1 Human rights policy commitments, paragraph 17	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator number 11				226
ESRS S2-1 Policies related to value chain workers, paragraph 18	Annex 1, Table 3, indicators no. 11 and 4				226
ESRS S2-1 Failure to observe the United Nations and OECD guiding principles on business and human rights and the OECD guidelines, paragraph 19	Annex 1, Table 1, Indicator no. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818		226
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		226
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Annex 1, Table 3, Indicator no. 14				224

Paragraph and corresponding Disclosure Requirement.	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS S3-1 Human rights policy commitments, paragraph 16	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator number 11				<u>230</u>
ESRS S3-1 Failure to observe the UNGPs on Business and Human Rights, ILO principles or and OECD guidelines, paragraph 17	Annex I, Table 1, Indicator no. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818		<u>230</u>
ESRS S3-4 Human rights issues and incidents, paragraph 36	Annex I, Table 3, Indicator no. 14				<u>224</u>
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator number 11				<u>237</u>
ESRS S4-1 Failure to observe the United Nations and OECD guiding principles on business and human rights and the OECD guidelines, paragraph 17	Annex I, Table 1, Indicator no. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12 (1), of Delegated Regulation (EU) 2020/1818		<u>237</u>
ESRS S4-4 Human rights issues and incidents, paragraph 35	Annex I, Table 3, Indicator no. 14				<u>224</u>
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Annex I, Table 3, Indicator no. 15				-
ESRS G1-1 Protection of whistleblowers, paragraph 10 d)	Annex I, Table 3, Indicator no. 6				-
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Annex I, Table 3, Indicator no. 17		Annex II of Delegated Regulation (EU) 2020/1816		<u>254</u>
ESRS G1-4 Standards of anti- corruption and anti-bribery, paragraph 24 b)	Annex I, Table 3, Indicator no. 16				<u>254</u>

2. ENVIRONMENTAL DISCLOSURES

EU Taxonomy

Methodological note for the European Taxonomy

The European Taxonomy, introduced by Regulation (EU) 2020/852 and its delegated acts, represents the classification system adopted by the European Union to identify economic activities considered environmentally sustainable from an environmental perspective.

The section illustrates the activities of the TIM Group within this regulatory framework and assesses their contribution to one or more of the six environmental objectives defined by the EU:

- climate change mitigation;
- climate change adaptation;
- sustainable use and protection of water and marine resources;
- transition to a circular economy;
- prevention and reduction of pollution;
- protection and restoration of biodiversity and ecosystems.

An economic activity is considered "aligned" with the Taxonomy and therefore sustainable if it jointly meets the following conditions:

- contributes substantially to at least one of the six environmental objectives;
- does not cause significant damage to the other objectives (Do No Significant Harm principle – DNSH);
- is carried out in compliance with the Minimum Safeguard Guarantees in the area of human rights and responsible business conduct;
- complies with the Technical Screening Criteria (TSC) defined by the European Commission.

During 2025, the European Commission adopted Delegated Regulation (EU) 2026/73, which entered into force on January 1, 2026, introducing measures aimed at simplifying the classification system for economic activities and sustainable investments and reducing the administrative burden for businesses.

For the 2025 financial year, in continuity with the previous financial year and in accordance with the legislation applicable in the reference period, the TIM Group has prepared the disclosure relating to the European Taxonomy referring to Regulation (EU) 2021/2178, Delegated Regulation (EU) 2021/2139 and Delegated Regulation (EU) 2023/2486, in the version applicable as of December 31, 2025.

Therefore, the TIM Group conducted the analysis of eligibility and alignment of its activities with reference to all six environmental objectives. The analysis was carried out with respect to the environmental reporting perimeter and includes the relevant economic activities that belong to the following group companies: TIM S.p.A., Noovle S.p.A., Olivetti S.p.A., Telecom Italia Sparkle S.p.A. and TIM S.A.

The scope of eligibility of the TIM Group

The identification of eligible activities¹ under the EU Taxonomy was divided into four **phases**:

- preliminary analysis of the Group's business model and comparison with the classification of sustainable economic activities required by law;
- identification of potentially eligible activities;
- validation through the involvement of the competent company functions;
- formalization of the process and collection of evidence through the Group's ESG platform.

At the end of the analysis, **16 categories of eligible activities were mapped**, comprising **50 projects**.

The following table shows the summary of the activities included in the perimeter of eligibility, with the indication of:

- the title of the economic activity as defined by the EU Taxonomy Regulation;
- the description of the activities carried out by the Group attributable to this definition;
- the reference environmental objective;
- the group companies that carry out the activity.

Environmental objectives are indicated by the following acronyms: CCA – Adaptation to climate change; CCM – Climate change mitigation; WTR – sustainable use and protection of water and marine resources; CE – Transition to a circular economy.

¹ Activities that are among those listed in the Delegated Acts of the Taxonomy, regardless of whether they are actually aligned with the technical criteria.

Economic activity	Description of TIM activities	Objective	Company
4.1 Power generation by photovoltaic solar technology	<ul style="list-style-type: none"> ■ Management of distributed generation plants for the production of renewable electricity from solar sources: the activity includes the production of electricity from owned photovoltaic systems, installed on company sites and mainly intended for self-consumption. The plants are part of a distributed generation system that contributes to covering the operational energy needs of offices, mobile networks and data centers. 	CCM	TIM S.A.
4.5 Power generation from hydropower	<ul style="list-style-type: none"> ■ Management of distributed generation plants for the production of renewable electricity from hydroelectric sources: the activity includes the production of electricity from owned hydroelectric plants, mainly intended for the self-consumption of the Group's operating sites. The plants contribute to covering the company's energy needs for offices, mobile networks and data centers. 	CCM	TIM S.A.
4.8 Power generation from bioenergy	<ul style="list-style-type: none"> ■ Management of distributed generation plants for the production of renewable electricity from biomass: the activity includes the production of biomass plants owned, mainly intended for the self-consumption of the Group's operating sites. The plants contribute to meeting the energy needs of offices, mobile networks and data centers 	CCM	TIM S.A.
4.16 Installation and operation of electric heat pumps	<ul style="list-style-type: none"> ■ Installation of heat pumps for the reuse and recovery of waste heat: the activity concerns the installation and management of electric heat pumps at the Rozzano data centers, aimed at recovering the thermal energy generated by IT equipment. The system makes it possible to reuse the heat recovered by feeding it into the district heating network for civil and industrial uses and for the production of cooling energy intended for the cooling of IT rooms, contributing to the improvement of overall energy efficiency and the reduction of primary energy consumption. 	CCM	Noovle S.p.A.
4.25 Heat/cold production using waste heat	<ul style="list-style-type: none"> ■ Recovery and transfer of waste heat from the Rozzano data centers for reuse in district heating: the activity concerns the recovery of the thermal energy generated by the server rooms of the Rozzano data centers and its transfer to a third-party energy operator for supply to the district heating network. The heat produced by IT equipment is captured and enhanced through the use of heat exchangers and heat pumps, which allow it to rise in temperature and be transferred to the network in the form of hot water, allowing the reuse of heat energy otherwise dispersed. 	CCM	Noovle S.p.A.
4.30 High-performance cogeneration of heat/cold and electricity from gaseous fossil fuels	<ul style="list-style-type: none"> ■ Management and maintenance of high-performance cogeneration plants in the Padova and Bologna data centers: the activity concerns the operational management of high-efficiency cogeneration (CAR) plants powered by natural gas, installed at the data centers in Padua and Bologna. The plants are intended for the combined production of electricity, heat and cooling to serve IT infrastructures, contributing to the coverage of the energy needs of the sites through an integrated use of primary energy, in line with the efficiency requirements for high-performance cogeneration. Overall, the following are installed: <ul style="list-style-type: none"> • two plants at the Bologna data center (2,019 kW and 860 kW); • a plant at the Padua data centers (2,019 kW). 	CCM	TIM S.p.A.
	<ul style="list-style-type: none"> ■ Management of high-performance cogeneration plants at Data Centers in Acilia, Pomezia and Rozzano: the activity concerns the operational management of high-efficiency cogeneration (CAR) plants powered by natural gas, installed at several Group data centers, including Acilia, Pomezia and Rozzano. The plants are intended for the combined production of electricity, heat and cooling to serve IT infrastructures, contributing to the coverage of the energy needs of the sites through an integrated use of primary energy, in line with the efficiency requirements for high-performance cogeneration. Overall, the following are installed: <ul style="list-style-type: none"> • a plant at the data centers in Acilia (1,560 kW); • two plants at the Pomezia data center (1,800 kW each); • three plants at the Rozzano data center (2,019 kW, 2,300 kW and 1,000 kW). 	CCM	Noovle S.p.A.
4.31 Heat/cold production from gaseous fossil fuels in an efficient district heating and cooling system	<ul style="list-style-type: none"> ■ High-performance cogeneration for the production of electricity and heat for district heating: the activity concerns the combined production of electricity and heat through a high-performance cogeneration plant installed at the Rozzano data centers. The heat recovered from the cogeneration process is transferred to a third-party energy operator for input into the district heating network. Thermal energy is captured and enhanced through exchange systems and heat pumps managed by the operator, which allow it to be converted into useful heat for civil and industrial uses. 	CCM	Noovle S.p.A.
5.1 Construction, expansion and management of water collection, treatment and supply systems	<ul style="list-style-type: none"> ■ Expansion of the water monitoring system for the measurement of the water efficiency of the data centers: the activity concerns the extension and completion of the water consumption measurement systems at the owned data centers, in order to monitor the main points of water use in a timely manner. The intervention allows the structured detection of the water volumes used in cooling processes and supports the calculation of the Water Usage Effectiveness (WUE) indicator, contributing to the improvement of efficiency in the use of water resources and the reduction of waste. 	CCM	Noovle S.p.A.
7.3 Installation, maintenance and repair of energy efficiency devices	<ul style="list-style-type: none"> ■ Maintenance and modernization of data centers: the activity includes both ordinary and extraordinary maintenance interventions, as well as technological modernization interventions on the industrial plants serving the Group's data centers, including uninterruptible power supplies (UPS), refrigeration units, batteries, generators and auxiliary systems. <ul style="list-style-type: none"> • Routine and extraordinary maintenance interventions are aimed at preserving the functionality and performance of the plants over time, through repair activities, replacement of components, and restoration of optimal operating conditions, ensuring continuity of service and reliability of IT infrastructures. • Plant modernization interventions, on the other hand, concern the planned replacement of obsolete or end-of-life components with more technologically efficient solutions, with the aim of improving the energy performance of the data centers, reducing the risk of failure and optimizing the use of resources. 	CCM	Noovle S.p.A.

Economic activity	Description of TIM activities	Objective	Company
<p>8.1 Data processing, hosting and related activities</p>	<ul style="list-style-type: none"> ■ Provision of Cloud IaaS services in partnership with hyperscaler: the activity concerns the supply of data processing, hosting and digital infrastructure services provided through Public Cloud platforms, in collaboration with international suppliers (hyperscalers). TIM operates as a qualified partner, integrating and managing Infrastructure as a Service (IaaS) services that allow customers to use computational resources, storage, and network resources in a scalable and remote manner, without the need for physical infrastructure at their premises. The business includes managed and unmanaged services, including configuration, security, monitoring and optimization of digital assets. ■ Provision of Cloud Services and Data Protection through TIM Data Centers: the activity concerns the supply of services for data processing, hosting and information protection through the Group's own data centers, managed by Noovle. The services are delivered according to the Infrastructure as a Service (IaaS) model and allow customers to use computational resources, storage capacity, and data protection solutions in a virtualized and scalable way. The main services offered include backup, business continuity and systems recovery solutions. ■ Provision of cloud services in partnership with the Public Administration: the activity concerns the provision of application services in Software as a Service (SaaS) mode intended for Public Administration, provided through cloud infrastructures hosted in the Group's data centers, designed to ensure high standards of energy efficiency, cybersecurity, and operational continuity. The services allow the remote use of digital applications and platforms, without the need for local installations, contributing to the rationalization of IT infrastructures and a more efficient use of computational resources. Solutions include tools for information flow management, digital collaboration, and digitization of administrative processes. ■ Provision of Cloud Services for digital identity and electronic signature: the activity concerns the provision of digital services in cloud mode for the management of digital identity, electronic signatures, and the storage of electronic documents, provided by TIM and the subsidiary Trust Technologies, a qualified certification authority. The solutions include Certified Electronic Mail (PEC), digital identity (SPID), qualified electronic signature and compliant digital storage services, allowing businesses, citizens and Public Administrations to carry out online operations with legal validity, integrity and traceability. The services include the issuance, management and revocation of digital certificates, the secure management of cryptographic keys and authentication systems, as well as the protection and storage of information and digital transactions, through ICT infrastructures with high reliability and security. ■ Provision of cloud services in partnership for collaboration and data management applications: the activity concerns the provision of application solutions in Software as a Service (SaaS) mode, provided by TIM as a qualified partner of large international operators (hyperscalers) and local technology partners. The services allow companies and Public Administrations to use digital applications for collaboration, data management and process automation, without the need for their own IT infrastructures. Solutions include collaboration and productivity tools, customer relationship management (CRM) applications, and platforms for document management, data analysis, and digital workflows. The delivery takes place through centralized cloud infrastructures, which guarantee scalability, operational continuity, and high levels of security and service availability. ■ Provision of proprietary cloud services for the Public Administration: the activity concerns the provision of digital applications services in Software as a Service (SaaS) mode intended for Public Administration, provided through cloud infrastructures and data centers owned by the Group. The services enable the secure management, processing and transmission of digital data, ensuring business continuity, information protection and systems reliability. The use of centralized and virtualized infrastructures favors the rationalization of public IT resources and the optimization of the use of computational capacities, in line with the criteria for high-efficiency digital infrastructures. ■ Supply of proprietary housing and colocation services for companies: the activity concerns the supply of infrastructural hospitality services at the data centers owned by the Group, which allow companies to place servers, network equipment and storage systems in dedicated, secure and high energy efficiency technological environments. Services include the provision of equipped spaces in protected data rooms, equipped with redundant power supply systems and efficient cooling, high-performance connectivity, continuous monitoring, access control and ancillary technical services. The use of centralized infrastructures allows a more efficient management of energy resources and a rationalization of IT infrastructures compared to solutions distributed at customer sites. ■ Provision of proprietary SaaS cloud services through TIM data centers: the activity concerns the provision of digital applications services in Software as a Service (SaaS) mode, provided through the data centers owned by the Group. The solutions allow companies and Public Administrations to use digital applications and platforms remotely, without the need for dedicated IT infrastructures at their offices. The services support the secure management of data, business continuity and reliability of IT systems, contributing to the digitization of processes and the rationalization of technological resources. The use of data centers designed according to energy efficiency criteria allows a more optimized management of consumption than distributed solutions, favoring a digital evolution consistent with environmental sustainability objectives. ■ Secure digitization of the Public Administration - National Strategic Hub: the activity concerns the design, implementation and management of the national digital infrastructure intended to support the technological transformation of the Italian Public Administration as part of the National Strategic Hub project, developed through a public-private partnership. The Temporary Grouping of Companies led by TIM, with the participation of industrial and institutional partners, is responsible for the construction and management of four new generation data centers located in the areas of Rome and Milan, intended to host Public Administration systems and applications. Services include hosting and housing, provision of infrastructure resources and digital platforms in Infrastructure as a Service (IaaS) and Platform as a Service (PaaS) mode, as well as migration and transformation of public information systems. The infrastructure is designed to high standards of security, resilience and energy efficiency, contributing to the rationalization of public IT infrastructures and the consolidation of existing data centers in technologically advanced environments. 	CCM	TIM S.p.A.

Economic activity	Description of TIM activities	Objective	Company
8.1 Data processing, hosting and related activities	<ul style="list-style-type: none"> ■ Migrating digital platforms to next-generation cloud infrastructures (Google Cloud and Oracle Cloud): the activity concerns the migration and modernization of business systems and applications towards cloud infrastructures with high energy efficiency, as part of strategic partnerships with international cloud service suppliers. The project involves the progressive transfer of applications and workloads from on-premises environments to scalable and virtualized cloud platforms, with the aim of streamlining IT infrastructure, improving business continuity, security, and overall system performance, as well as optimizing the use of computational resources. The activities include the migration of business applications to Google Cloud Platform and Oracle Cloud Infrastructure environments and, where applicable, the development and marketing of digital services based on these infrastructures. ■ Migration and technological upgrade of core network platforms on Group data centers infrastructures: the activity concerns the modernization and migration of central platforms for the management of mobile telephony services, such as charging and billing systems, towards infrastructures allocated in the Group's data centers and managed by Noovle. The intervention is aimed at overcoming technological obsolescence, aligning with new generation network architectures (5G Service Oriented), and improving service quality and continuity. Migrating to more efficient and virtualized infrastructure environments allows you to streamline the use of IT resources, improve security and operational reliability, and optimize energy consumption compared to distributed legacy systems. ■ Development of the Edge Cloud digital infrastructure for distributed data management: the activity concerns the design and implementation of an Edge Cloud digital infrastructure aimed at the distributed processing of data near the points of use, as an alternative to centralized models based on remote data centers. The initiative is part of the Important Project of Common European Interest in Cloud Infrastructure and Services (IPCEI CIS) and is developed in collaboration with leading European operators in the telecommunications sector, with the aim of contributing to the definition of a common technological framework and the creation of a federated European ecosystem of Edge Cloud services, in line with the principles of digital sovereignty and data security. The activities include research, development, and first industrial application of open source software solutions tested in operational environments, aimed at improving latency, resilience, and efficiency in the use of computational resources. 	CCM	TIM S.p.A.
	<ul style="list-style-type: none"> ■ Migrating TIM applications to cloud infrastructures with high energy efficiency: the activity concerns the migration of the Group's proprietary applications workloads, previously hosted on on-premise infrastructures, to cloud environments of international providers operating in European data centers characterized by high standards of energy efficiency. The initiative includes the progressive reallocation of business applications and systems on Google Cloud, Oracle Cloud Infrastructure, and Microsoft Azure platforms, with the aim of streamlining IT infrastructure, improving the scalability and resilience of systems, and optimizing the use of computational resources. ■ Replacement of data storage systems for the improvement of energy efficiency: the initiative provides for the replacement and consolidation of 50 obsolete data storage devices (storage equipment) with 26 new systems from the supplier "Pure Storage" characterized by higher performance and lower energy consumption. The data centers affected by the intervention are Cesano, Bologna, Padua, Oriolo and Pomezia. The operation makes it possible to optimize data storage capacity and reduce overall energy consumption in data centers by improving the efficiency of IT infrastructures. ■ Modernization and migration of IT systems for data centers efficiency: the activity includes technological updating and rationalization of IT infrastructures aimed at improving the energy efficiency and operational efficiency of the Group's data centers. In particular, three obsolete data storage systems were replaced with new high energy efficiency solutions at the Pomezia and Padua data centers, with the aim of reducing electricity consumption per unit of installed processing capacity. ■ The initiative also includes the migration of captive application workloads from the Naples data center to the Pomezia data center, characterized by more high-performing and flexible digital infrastructures, capable of dynamically optimizing the use of computational resources, memory and storage. The migration was carried out through controlled procedures, both through the physical transfer of equipment and through the migration of virtualized environments, ensuring the operational continuity of services. ■ Digital automation of business processes for operational efficiency: the activity concerns the development and implementation of workflow automation solutions for the digitization and integration of business processes, with particular reference to Operations and Asset Management activities of IT and network infrastructures. The solutions, delivered in Software as a Service (SaaS) mode, allow you to centralize and automate operational flows previously distributed on heterogeneous systems, improving the coordination of activities, process traceability and efficiency in the use of IT resources. Flow automation reduces operational redundancies and unnecessary processing cycles, contributing to the optimization of the use of IT infrastructures and, indirectly, to the reduction of energy consumption associated with digital systems. 	CCM	Noovle S.p.A
	<ul style="list-style-type: none"> ■ Upgrading of power supply systems in the Palermo data centers: the activity concerns the modernization of the power supply systems of the Palermo data centers (Sicily Hub), by replacing existing uninterruptible power supply devices with new high efficiency uninterruptible power supply (UPS) units. The intervention is aimed at improving the energy efficiency of the power supply system and reducing electrical losses, while ensuring high levels of reliability and operational continuity of IT infrastructures. ■ Construction and installation of a new data room at the data centers in Milan: the activity concerns the construction of a new data room of about 125 m² at the Milan Malpaga data centers, intended for the provision of colocation services for operators in the digital sector. The intervention involved the installation of power supply, air conditioning, and wiring systems, designed to ensure energy efficiency, safety, and operational continuity. The new infrastructure allows the hosting of high-density IT equipment, ensuring reliability and optimization of energy consumption. 	CCM	Sparkle S.p.A.
	<ul style="list-style-type: none"> ■ Implementation and management of digital systems for remote control of civil and telecommunications infrastructures: the activity concerns the development and management of digital solutions based on connected sensors (IoT) and software platforms dedicated to remote monitoring and remote control of civil and network infrastructures. The systems allow the collection and analysis in real time of data relating to energy consumption, operating status and structural conditions, allowing timely interventions in the event of anomalies and reducing the need for on-site inspections and maintenance activities. In the case of critical infrastructure, such as railway bridges, structural and seismic sensors support continuous monitoring of safety conditions, contributing to more efficient management of operations and risk prevention. 	CCM	Olivetti S.p.A.

Economic activity	Description of TIM activities	Objective	Company
8.1 Data processing, hosting and related activities (E1-3)	<ul style="list-style-type: none"> ■ Environmental management of data centers: the activity concerns the adoption of environmental management systems and practices aimed at reducing energy consumption and the environmental impact associated with the processing, storage and transmission of data in the Group's data centers. The management is oriented to the continuous improvement of environmental performance through the structured monitoring of energy consumption, the use of efficiency indicators and the implementation of optimization interventions, with particular attention to air conditioning systems, the efficiency of technological infrastructures and the increase in supply from renewable sources. Data Centers operate in accordance with industry best practices and recognized environmental and safety standards, ensuring a balance between operational efficiency, service continuity, and sustainability. 	CCM	TIM S.A.
8.2 Data-driven solutions for the reduction of greenhouse gas emissions	<ul style="list-style-type: none"> ■ Digital services for environmental monitoring and intelligent land management: the initiative concerns the provision of digital solutions for the integrated management of the territory in the Smart City area, aimed mainly at public administrations. The services are based on internet of things (IoT) technologies, cloud platforms and advanced data analysis tools, including Artificial Intelligence algorithms, which allow the real-time collection and processing of environmental and infrastructure information. The solutions allow the monitoring of parameters such as traffic and mobility, parking availability, air quality, weather conditions, flows of people and vehicles and other indicators relevant to urban safety and territorial planning. ■ Solutions for monitoring and efficiency of energy consumption: the activity concerns the provision of digital solutions for the integrated management of the territory in the Smart City area, aimed mainly at public administrations. The services are based on internet of things (IoT) technologies, cloud platforms and advanced data analysis tools, including Artificial Intelligence algorithms, which allow the collection and real-time processing of environmental and infrastructure data. The solutions allow the monitoring of parameters such as traffic and mobility, parking availability, air quality, weather conditions, flows of people and vehicles and other indicators useful for urban planning and the management of public services. 	CCM	TIM S.p.A.
	<ul style="list-style-type: none"> ■ Digital system for optimizing the charging of electric vehicles in public transport: the activity concerns the development and implementation of a digital solution to support the charging management of electric buses used in the local public transport service in the city of Naples. The system allows the planning and optimization of charging operations on the basis of dwell times, service shifts and the operational needs of the different routes. Through energy management algorithms, the platform processes data on the status of vehicles and charging infrastructures in real time, assigning priority to vehicles based on energy needs and service programming. The solution is based on digital technologies and connected sensors (IoT) for the collection and integration of operational data from the fleet and charging stations, allowing dynamic management of charging sessions and more efficient use of the available infrastructures. 	CCM	Olivetti S.p.A.
8.3 Programming and broadcasting activities	<ul style="list-style-type: none"> ■ Dissemination of multimedia content through TIMVISION: the activity concerns the distribution and management of streaming audiovisual content through TIMVISION, the Group's digital entertainment service. Content is accessed and used through the MyCanal platform, developed and managed by Canal+, which acts as a user interface for navigation, content search, personalized recommendations and profile management. According to the contractual agreement, the platform is provided in "in service" mode, with operational management by the external provider; TIM does not exercise direct control or access to the internal systems of the platform ("black box" mode). 	CCA	TIM S.p.A.
4.1 Provision of solutions based on IT/OT (information technologies/operational technologies) data for the reduction of losses	<ul style="list-style-type: none"> ■ Implementation of digital system for remote monitoring of water resources in the Municipality of Belluno: the activity concerns the implementation of a digital supervision and control platform (SCADA) for the remote management and monitoring of the municipal water network, with the aim of reducing losses and improving the operational efficiency of the service. The system, funded under the NRRP, integrates intelligent peripheral devices and remote control units (RTUs) for the collection and real-time transmission of data along the network, allowing the timely detection of anomalies and malfunctions and supporting a more efficient management of water and energy resources. 	WTR	Olivetti S.p.A.
5.3 Preparing for reuse of end-of-life products and product components	<ul style="list-style-type: none"> ■ Use of regenerated devices for technical assistance services: the activity concerns the use of regenerated modems in assistance services for consumer and small business customers. Devices returned due to failure or termination of service undergo a structured process of selection, testing, repair, and updating at specialized centers, in order to ensure full functionality and safety for reuse. Regenerated equipment is reintroduced into the operating cycle as replacement equipment, contributing to the reduction of electronic waste and the lower use of new material resources, in line with the principles of the circular economy. 	CE	TIM S.p.A.
	<ul style="list-style-type: none"> ■ Recovery and reuse of disused electronic equipment of customers: The activity concerns the collection, regeneration, and reuse programs of the equipment provided to customers (modem, router, decoder) returned following the termination or inactivity of the service. The returned devices are subjected to inspection, functional tests, and software update to verify their suitability for reuse; compliant units are regenerated and re-entered into the operating cycle, contributing to the reduction of the demand for new equipment and electronic waste. Non-reusable equipment is instead sent for treatment and recycling at authorized plants, in compliance with environmental legislation ■ Recovery and reuse of used mobile devices: The initiative promotes the collection of used smartphones through trade-in programs that allow customers to return their device in exchange for discounts on the purchase of new models. The collected devices are subjected to technical verification, secure deletion of data and, where necessary, to regeneration and replacement of components, in order to certify their suitability for reuse and return them to the market, contributing to the reduction of electronic waste and the extension of the life cycle of the products. 	CE	TIM S.A.

Economic activity	Description of TIM activities	Objective	Company
5.4 Sale of second-hand goods	<ul style="list-style-type: none"> ■ Disposal and resale of unused and obsolete network equipment: the initiative concerns the disposal and enhancement of technological equipment no longer used in the process of modernizing network infrastructure. End-of-life equipment – including routers, switches and servers – are selected and, where appropriate, reintroduced to the market for reuse, contributing to the reduction of electronic waste and the enhancement of assets. The activity also allows you to optimize physical spaces and infrastructure management costs, including those in colocation. 	CE	TIM S.p.A.
	<ul style="list-style-type: none"> ■ Supply of refurbished toner cartridges for the Public Administration (Consp): the initiative concerns the supply of refurbished toner cartridges as part of Consip tenders for the Public Administration, with the commitment that at least 30% of the supplies consist of refurbished products. The spent cartridges are recovered, subjected to cleaning, technical verification, possible replacement of worn components and refilling of the toner, to be reintroduced into the production cycle. The activity contributes to the reduction of waste and the consumption of raw materials, favoring the extension of the life cycle of the products. ■ Sale of refurbished multifunction printers: the initiative concerns the marketing, through the network of authorized Olivetti dealers, of multifunction printers subjected to regeneration processes. The equipment is checked, cleaned, repaired, and equipped with replacement components where necessary, to ensure its correct operation and compliance with quality standards. The activity allows to extend the life cycle of the devices, reducing the production of electronic waste and the need for new resources. 	CE	Olivetti S.p.A.
5.5 Product-as-a-service and other service models geared towards circular use and results	<ul style="list-style-type: none"> ■ Rental of mobile devices: the initiative concerns the rental of mobile devices to Small Business customers under dedicated contracts, including connectivity via TIM SIM. At the end of the contract period, the devices are returned to the Group for status verification and possible regeneration or reuse, favoring the extension of the life cycle of the equipment and the reduction of electronic waste. ■ Loan for use of modem for access to the FWA network: The initiative provides for the granting on loan for use of modems necessary for access to broadband connectivity services through fixed wireless access (FWA) technology, in indoor and outdoor configuration. The devices remain the property of TIM and, at the end of the contract, are returned for verification, regeneration or reuse, favoring the extension of the life cycle of the equipment and the reduction of electronic waste. 	CE	TIM S.p.A.

Verification of compliance with the Minimum Safeguard Guarantees

The verification of compliance with the Minimum Safeguard Guarantees is an integral phase of the process of assessing the alignment of its economic activities with the EU Taxonomy. The analysis constitutes a cross-cutting and preliminary condition with respect to the verification of the technical criteria of substantial contribution and the DNSH principle. The positive outcome of this evaluation allows the eligible activities to be considered as potentially aligned, where the additional requirements provided for by the Regulation are also met.

Specifically, in this phase, it is verified that the activities are carried out in accordance with the main international reference standards on human rights, labor, and responsible business conduct, including the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, and the fundamental principles of the International Labour Organization (ILO). The commitment translates into a structured system of policies, procedures, and internal controls aimed at preventing risks of non-compliance and promoting ethical and responsible behavior in all Group activities and along the value chain.

Human Rights

The Group protects the fundamental rights of individuals through:

- membership of the United Nations Global Compact;
- adoption of a human rights Policy, applied to employees, partners and suppliers, covering issues such as forced and child labor, non-discrimination, freedom of association, pay equity, health and safety;
- integration of these principles into the Code of Ethics and governance tools;

In Brazil, TIM S.A. strengthens its commitment through the Social Responsibility Policy.

Corruption prevention

The Group protects the fundamental rights of individuals through:

- membership of the United Nations Global Compact;
- adoption of a human rights Policy, applied to employees, partners and suppliers, covering issues such as forced and child labor, non-discrimination, freedom of association, pay equity, health and safety;
- integration of these principles into the Code of Ethics and governance tools;

In Brazil, TIM S.A. strengthens its commitment through the Social Responsibility Policy.

Responsible taxation

The Group's tax approach is based on transparency and collaboration with the authorities, through:

- a tax strategy (TIM Tax Strategy) based on fairness and compliance with regulations;
- a tax risk management system with defined responsibilities;

- the involvement of management and the supervision of the Board of Directors;
- periodic checks and reviews of control measures;
- Audit in accordance with Brazilian and international standards by TIM S.A.

Fair competition

The Group operates in compliance with market and competition rules through a dedicated compliance framework that includes:

- an Antitrust Code of Conduct approved by the Board of Directors;
- an Antitrust Compliance Program aimed at employees and functions most exposed to competitive risks;
- periodic training activities and awareness-raising initiatives on competition topics;
- control devices and reporting mechanisms.

In Brazil, the adoption by TIM S.A. of the Competition Defence Policy, which regulates the behaviors to be adopted in relations with competitors, customers and authorities, in line with local legislation.

Verification of alignment of technical screening criteria and DNSH

Following the identification of the activities eligible for the European Taxonomy, the TIM Group has prepared a structured process to evaluate the possible alignment of its economic activities.

The analysis, carried out with the involvement of the competent technical functions and, where necessary, of third parties that collaborate with the Group in the management of economic activities, has made it possible to ascertain, through the timely verification of the technical screening criteria and compliance with the "Do No Significant Harm" (DNSH) principle, which activities are already fully compliant with the requirements of European legislation and to identify, at the same time, the areas subject to initiatives aimed at the progressive strengthening of alignment.

In 2025, three economic activities aligned with the European Taxonomy were identified, as defined below:

4.16 - Installation and operation of electric heat pumps;

4.25 - Heat/cold production using waste heat;

8.1 Data processing, hosting and related activities.

Since Activities 4.16 and 4.25 are carried out on the same site and partly use the same technical infrastructures, some DNSH audits were conducted in a coordinated manner, while still complying with the specific criteria established for each activity. In particular, the criteria relating to Adaptation to climate change and Transition to a circular economy, which are common to both activities, were assessed through a single analysis, broken down according to the requirements of the respective activities.

The Pollution Prevention and Reduction DNSH criterion is also applicable to both activities. The checks, however, were conducted separately as the technical requirements and compliance parameters required by the legislation differ depending on the specific type of intervention.

However, some additional DNSH criteria provided for by the legislation remain specific to each activity. In particular, for activity 4.16 the criterion relating to the Sustainable Use and Protection of Waters and Marine Resources applies, while for activity 4.25 the criterion relating to the Protection and Restoration of Biodiversity and Ecosystems applies.

With reference to activity 4.16, the activity was considered aligned with the European Taxonomy as the installation of the electric heat pump system, within a data center that meets sustainability criteria, provides a contribution to the climate change mitigation objective and complies with the "Do No Significant Harm" (DNSH) principle provided for by the applicable legislation.

Specifically, it was verified that the Rozzano data center has an overall low level of climate vulnerability, also thanks to the adaptation project measures adopted. This conclusion derives from a specific analysis of climate risks that highlighted low or medium exposures, mainly related to extreme heat and water stress events, being consistent with the DNSH related to adaptation to climate change.

It has also been ascertained that, at the Rozzano data centers, the exercise of the activities does not involve significant withdrawals of water resources or significant alterations in the quality or temperature of surface or groundwater, in accordance with the DNSH relating to the Sustainable Use and Protection of Waters and Marine Resources.

The verification carried out on the site also concerned the adoption of a structured end-of-life waste management plan, as well as the evaluation of the durability, recyclability, demountability, and possibility of requalification of electric heat pumps, resulting in line with the requirements of the DNSH criterion relating to the transition to a circular economy.

Activity 4.25 is also aligned with the European Taxonomy as it has been ascertained that the heat and cold production system by waste heat recovery allows the enhancement of the thermal energy generated by IT infrastructures and meets the criteria of substantial contribution to the climate change mitigation objective, in compliance with the DNSH principle provided for by the applicable legislation.

In addition to the checks common to activity 4.16 already described in terms of adaptation to climate change, sustainable use of water, and transition to the circular economy, as they refer to the same site, the compliance of the heat and cold production plant with eco-sustainable design criteria, energy efficiency, and adoption of the best available technologies for heat and circulation pumps was verified. This verification confirmed compliance with the DNSH on Pollution Prevention and Reduction. Finally, the Environmental Impact Assessment (EIA) procedure was carried out, aimed at verifying and mitigating the potential environmental impact of the intervention, in line with the DNSH concerning the protection and restoration of biodiversity and ecosystems.

Activity 8.1 – Data processing, hosting and related activities was also considered aligned with the European Taxonomy, limited to the Group's specific initiative "Digital automation of business processes for operational efficiency". The initiative involves the

adoption of a cloud-based digital workflow automation platform (Software as a Service – SaaS), aimed at digitizing internal infrastructure and operations management processes, including Asset Management. Implementing the platform allows you to streamline processing cycles, reduce operational errors, and optimize the use of IT resources.

For this initiative and its related infrastructure scope, compliance with the requirements for a substantial contribution to the climate change mitigation objective has been verified, thanks to the use of energy-efficient digital infrastructure, as well as compliance with the “Do No Significant Harm” (DNSH) principle set forth in the applicable regulations.

In particular, it was verified that the business is based on data processing and hosting services provided through data centers of selected suppliers. The facilities offer high standards of energy efficiency and sustainability, adhere to the European Code of Conduct on Energy Efficiency for data centers, have been subjected to audits by third-party bodies in the last three years, and use refrigerants with a Global Warming Potential (GWP) of less than 675.

Analyses were conducted on the data centers to assess the level of exposure to physical risks related to climate and the adequacy of the related management measures, in line with the DNSH criterion relating to adaptation to climate change.

Water risk analyses were also carried out at the sites concerned in order to ascertain the absence of significant impacts on water resources, in line with the DNSH criterion relating to the sustainable use and protection of water and marine resources.

Finally, the Data Centers' adoption of end-of-life waste management plans was verified, aimed at maximizing the reuse, remanufacturing, and recycling of installed equipment, in line with the DNSH criterion relating to the Transition to a Circular Economy.

During the year, TIM also **embarked on a structured and progressive process** to ensure compliance with the requirements **necessary for alignment** with the additional activities mapped by the European Taxonomy, with particular attention to activities related to the Group's core business, **including activity 8.1** - Data processing, hosting, and related activities.

In this context, an extensive climate risk analysis was conducted across all of the TIM Group's physical assets relevant to the provision of digital and infrastructure services, including data centers and key technological infrastructures located in Italy and Brazil. The analysis was aimed at strengthening the monitoring of the DNSH principle with reference to the objective of Adaptation to Climate Change and to ensure a homogeneous and comparable assessment of physical risks across the entire operational perimeter.

At the same time, in order to meet the technical screening criteria of activity 8.1, in 2025 independent bodies carried out on-site audits at the Group's main data centers within the framework of the European Code of Conduct for the energy efficiency of data centers, with a positive outcome for 11 sites. Audits and technical verification activities represent an evolutionary step aimed at creating the conditions for a progressive expansion of the scope of activities 8.1 potentially alignable with the European Taxonomy in the coming years, through a gradual process of adaptation and formalization of the requirements set out in the legislation.

The checks are part of a broader process to strengthen the technical, organizational and documentary oversight of the Group's data centers. The objective also for future years is to systematically consolidate evidence relating to energy efficiency, refrigerant management, consumption monitoring, and other environmental safeguards relevant to the substantial contribution criteria and DNSH.

Criteria for calculating the required KPIs for eligible and aligned activities

The EU Taxonomy legislation requires companies to report specific key performance indicators (KPIs) — Turnover, CapEx and OpEx — with the aim of representing the degree of exposure of the Group's economic activities to environmentally sustainable activities. The indicators allow us to understand to what extent revenues, investments and operating expenses are associated with activities within the scope of the Taxonomy (eligible) and, among these, those that meet the technical criteria provided for by the Regulation (aligned).

The accounting criteria adopted by the Group for the calculation of KPIs, defined in accordance with the provisions of Annex I of Delegated Regulation (EU) 2021/2178 and consistent with the accounting standards applied in the consolidated financial statements, are described below.

KPI	Description	References to the Consolidated Financial Statements
Turnover	<ul style="list-style-type: none"> The numerator is represented by the net revenues associated with the sale of Group products and services related to activities eligible and/or aligned with the EU Taxonomy, as specified in point 1.1.1 of the Delegated Act. The denominator corresponds to the item "Revenues" of the consolidated statement of comprehensive income for the year 2025, prepared in accordance with IAS 1, paragraph 82(a). 	Note 26: Revenues
CapEx	<ul style="list-style-type: none"> The numerator represents the share of capital expenditure recorded in the assets of the consolidated financial statements referring to eligible activities, identified according to the criteria of point 1.1.2.2 of the Delegated Act. The denominator includes the increases in tangible and intangible assets for the year, considered before depreciation, impairment losses and revaluations, including the effects of revaluations and reductions in value and excluding those deriving from changes in fair value. Increases resulting from business combinations are also included. 	Note 5, 6 and 7: Intangible assets with finite useful life, tangible assets and rights of use assets
OpEx	<ul style="list-style-type: none"> The numerator represents the share of operating expenses referring to eligible activities, identified according to the criteria of point 1.1.3.2 of the Delegated Act. In order to avoid double counting phenomena, only expenses directly attributable to activities complying with the criteria of the Taxonomy have been included. The denominator includes the total operating expenses defined by point 1.1.3.1 of the Delegated Deed, consisting of non-capitalized direct costs related to research and development, building renovations, short-term leases, maintenance and repair, as well as other direct expenses related to the ordinary maintenance of property, plant and equipment. 	The OpEx defined by the EU Taxonomy differs from that reported in the consolidated financial statements, as it includes only specific categories of direct costs of maintenance and repair of tangible assets; therefore, a timely reconciliation with the income statement items is not possible.

The data relating to turnover, operating expenses and share capital expenses for eligible activities aligned with the Taxonomy, used for the calculation of KPIs, was extracted from the general and analytical accounting systems of the Group's consolidated companies. Where it was not possible to identify the economic amounts in a timely manner, management estimates were used. Where necessary, the data have been adjusted to ensure full compliance with IFRS adopted in the consolidated financial statements of the TIM Group, including appropriate consolidation eliminations, such as intra-group transactions and elimination of internal profits.

Composition of Revenue KPI		
Economic Activity	Description	Economic Amounts (€k)
Aligned Activities		
CCM 4.25	Heat/cold production using waste heat	55.00
Aligned Turnover		55 €k
Eligible Activities		
CCM 4.31	Production of heat or cold from gas-fired cogeneration or trigeneration plants for efficient district heating and cooling networks	55.00
CCM 8.1	Data processing, hosting and related activities	814,360.00
CCM 8.2	Data-driven solutions for reducing greenhouse gas emissions	14,823.00
WTR 4.1	Provision of solutions based on IT/OT (information technology/operational technologies) data for the reduction of losses	177.00
CE 5.4	Sale of second-hand goods	337.00
CE 5.5	Rental of mobile devices	3,725.00
Eligible Turnover		83,3477 €k

Composition of the CapEx KPI		
Economic Activity	Description	Economic Amounts (€k)
Eligible Activities		
CCM 4.30	High-performance cogeneration of heat/cold and electricity from gaseous fossil fuels	729.70
CCM 5.1	Construction, expansion and management of water collection, treatment and supply systems	247.80
CCM 7.3	Installation, maintenance and repair of energy efficiency devices	12,000
CCM 8.1	Data processing, hosting and related activities	65,556.03
CCM 8.2	Data-driven solutions for reducing greenhouse gas emissions	150.00
CE 5.5	Rental of mobile devices	11,260.57
Eligible share capital expenditures		89.944,1 €k

OpEx KPI Composition		
Economic Activity	Description	Economic Amounts (€k)
Aligned Activities		
CCM 4.16	Installation and operation of electric heat pumps	215.80
CCM 4.25	Heat/cold production using waste heat	215.80
CCM 8.1	Data processing, hosting and related activities	3,350.00
Aligned operating expenses		3781,6 €k
Eligible Activities		
CCM 4.1	Power generation by photovoltaic solar technology	29,909.86
CCM 4.5	Production of electricity from hydroelectric sources	5,830.63
CCM 4.8	Production of electricity from bioenergy	2,971.76
CCM 4.30	Efficient combined production of electricity and heat from fossil gases (high-performance cogeneration)	339.50
CCM 4.31	Production of heat or cold from gas-fired cogeneration or trigeneration plants for efficient district heating and cooling networks	215.80
CCM 7.3	Installation, maintenance and repair of energy efficiency devices	5,913.00
CCM 8.1	Data processing, hosting and related activities	54,363.00
CCA 8.3	Programming and broadcasting activities	5,340.00
CE 5.3	Preparing for reuse of end-of-life products and product components	5,299.28
CE 5.4	Sale of second-hand goods	77.00
Eligible operating expenses		110.259,83 €k

Models for fundamental performance indicators (KPIs) of non-financial firms

Model — Share of turnover deriving from products or services associated with economic activities aligned with the taxonomy — Disclosure for the year 2025

2025 financial year		2025		Criteria for substantial contribution						DNSH ("Do No Significant Harm") criteria						Minimum safeguards	Share of Taxonomy aligned (A.1) or eligible (A.2) turnover 2025	Enabling activity category	Transition al activity category
Economic activities	Code	Turnover	Share of turnover, year 2025	Climate change mitigation	Adaptation to climate change	Water	pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	pollution	Circular economy	Biodiversity				
Text		€k	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																			
A.1 Environmentally sustainable activities (taxonomy-aligned)																			
4.25 Heat or cold production by waste heat recovery	CCM 4.25	55.00	0.0004%	Yes	N/EL	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	%		
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		55.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Of which enabling		—	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	No	No	No	No	No	No	No	0.00%		
Of which transitional		—	0.00%	0.00%							No	No	No	No	No	No	0.00%		
A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
4.1 Digital solutions for reducing water losses	WTR 4.1	177.00	0.00%	N/EL	N/EL	EL	N/EL	N/EL	N/EL							0.00%			
4.31 Production of heat or cold from gas-fired cogeneration or trigeneration plants for efficient district heating and cooling networks	CCM 4.31	55.00	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.00%			
5.4. Sale of second-hand goods	CE 5.4	337.00	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL							0.00%			
5.5 Usage models and services based on the circular economy	CE 5.5	3,725.00	0.03%	N/EL	N/EL	N/EL	N/EL	EL	N/EL							0.03%			
8.1 Data processing, hosting and related activities	CCM 8.1	814,360.00	5.93%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.71%			
8.2 Data-driven solutions for reducing greenhouse gas emissions	CCM 8.2	14,823.00	0.11%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							0.00%			
Turnover from activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		833,477.00	6.07%	6.04%	0.00%	0.00%	0.00%	0.03%	0.00%							0.74%			
A. Turnover of activities eligible for the taxonomy (A.1 + A.2)		833,532.00	6.07%	6.04%	0.00%	0.00%	0.00%	0.03%	0.00%							0.74%			
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
Turnover of activities not eligible for taxonomy		12,900,825.00	93.93%																
Total		13,734,357.00	100.00%																

	Share of turnover/Total turnover	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	0.00%	6.04%
CCA	0.00%	0.00%
WTR	0.00%	0.00%
CE	0.00%	0.03%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

Model — Share of capital expenditure (CapEx) deriving from products or services associated with economic activities aligned with the taxonomy — Disclosure relating to the year 2025

2025 financial year			2025			Criteria for substantial contribution					DNSH ("Do No Significant Harm") criteria					Minimum safeguards	Share of CapEx aligned with (A.1) or eligible (A.2) for the taxonomy, 2024	Enabling activity category	Transition al activity category
Economic activities	Code	CapEx	Share of CapEx, 2025	Climate change mitigation	Adaptation to climate change	Water	pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	pollution	Circular economy	Biodiversity				
Text		€k	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																			
A.1 Environmentally sustainable activities (taxonomy-aligned)																			
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	No	No	No	No	No	No		0.00%		
Of which enabling		0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	No	No	No	No	No	No		0.00%		
Of which transitional		0.00	0.00%	0.00%						No	No	No	No	No	No		0.00%		
A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
4.30 Efficient combined production of electricity and heat from fossil gases (high-performance cogeneration)	CCM 4.30	729.70	0.03%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%		
5.1 Monitoring water consumption in data centers	CCM 5.1	247.80	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.01%		
5.5 Usage models and services based on the circular economy	CE 5.5	11,260.57	0.45%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.10%		
7.3. Installation, maintenance and repair of energy efficiency devices	CCM 7.3	12,000.00	0.48%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.01%		
8.1 Data processing, hosting and related activities	CCM 8.1	65,556.03	2.62%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.61%		
8.2 Data-driven solutions for reducing greenhouse gas emissions	CCM 8.2	150.00	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%		
CapEx of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		89,944.10	3.60%	3.15%	0.00%	0.00%	0.00%	0.45%	0.00%								1.73%		
A. CapEx of taxonomy-eligible for activities (A.1 + A.2)		89,944.10	3.60%	3.15%	0.00%	0.00%	0.00%	0.45%	0.00%								1.73%		
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY																			
CapEx of activities not eligible for taxonomy		2,410,895.90	96.40%																
Total		2,500,840.00	100.00%																

	Share of CapEx/Total CapEx	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	0.00%	3.15%
CCA	0.00%	0.00%
WTR	0.00%	0.00%
CE	0.00%	0.45%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

Model — Share of operating expenses (OpEx) deriving from products or services associated with economic activities aligned with the taxonomy — Disclosure relating to 2025

2025 financial year	2025			Criteria for substantial contribution						DNSH ("Do No Significant Harm") criteria						Minimum safeguards	Share of OpEx aligned with (A.1) or eligible (A.2) for the taxonomy, 2024	Enabling activity category	Transition al activity category
	Code	OpEx	Share of OpEx, 2025	Climate change mitigation	Adaptation to climate change	Water	pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	pollution	Circular economy	Biodiversity				
Text		€k	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
A. ACTIVITIES ELIGIBLE FOR TAXONOMY																			
A.1 Environmentally sustainable activities (taxonomy-aligned)																			
4.16 Installation and operation of electric heat pumps	CCM 4.16	215.80	0.01%	Yes	N/EL	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
4.25 Heat or cold production by waste heat recovery	CCM 4.25	215.80	0.01%	Yes	N/EL	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
8.1 Data processing, hosting and related activities	CCM 8.1	3,350.00	0.21%	Yes	N/EL	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		T
Operating expenses of environmentally sustainable activities (taxonomy-aligned) (A.1)		3,781.60	0.24%	0.24%	0.00%	0.00%	0.00%	0.00%	0.00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Of which enabling		0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	No	No	No	No	No	No	No	0.00%		
Of which transitional		3,350.00	0.21%	0.21%						Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		

A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned)											
				EL; N/EL							
4.1 Power Generation by Photovoltaic Solar Technology	CCM 4.1	29,909.86	1.87%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	1.32%	
4.5 Production of electricity from hydroelectric sources	CCM 4.5	5,830.63	0.37%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.33%	
4.8 Production of electricity from bioenergy	CCM 4.8	2,971.76	0.19%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.16%	
4.30 Efficient combined production of electricity and heat from fossil gases (high-performance cogeneration)	CCM 4.30	339.50	0.02%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.05%	
4.31 Production of heat or cold from gas-fired cogeneration or trigeneration plants for efficient district heating and cooling networks	CCM 4.31	215.80	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%	
5.3 Preparing for reuse of end-of-life products and product components	CE 5.3	5,299.28	0.33%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	0.17%	
5.4. Sale of second-hand goods	CE 5.4	77.00	0.00%	N/EL	N/EL	N/EL	N/EL	EL	N/EL	0.02%	
7.3. Installation, maintenance and repair of energy efficiency devices	CCM 7.3	5,913.00	0.37%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%	
8.1 Data processing, hosting and related activities	CCM 8.1	54,363.00	3.41%	EL	N/EL	N/EL	N/EL	N/EL	N/EL	5.31%	
8.3 Programming and transmission of radio and television and multimedia content	CCA 8.3	5,340.00	0.33%	N/EL	EL	N/EL	N/EL	N/EL	N/EL	0.00%	
Operating expenses of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		110,259.83	6.91%	6.24%	0.33%	0.00%	0.00%	0.34%	0.00%	7.36%	
A. OpEx of taxonomy-eligible activities (A.1 + A.2)		114,041.43	7.15%	6.24%	0.33%	0.00%	0.00%	0.34%	0.00%	7.36%	
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY											
Operating expenses of activities not eligible for taxonomy		1,481,785.57	92.85%								
Total		1,595,827.00	100.00%								

	Share of OpEx/Total OpEx	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	0.24%	6.24%
CCA	0.00%	0.33%
WTR	0.00%	0.00%
CE	0.00%	0.34%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

Model 1 - Nuclear and fossil gas related activities

Line	Activities related to nuclear energy	
1	The company carries out, finances or has exposure to research, development, demonstration and construction of innovative plants for the generation of electrical energy that produce energy from nuclear processes with a minimum amount of waste from the fuel cycle.	No
2	The company carries out, finances or has exposure to the construction and safe operation of new nuclear plants for the generation of electrical energy or process heat, also for district heating purposes or for industrial processes such as the production of hydrogen, and improvements to their safety, with the aid of the best available technologies.	No
3	The company carries out, finances or has exposure to the safe operation of existing nuclear plants that generate electrical energy or process heat, including for district heating or for industrial processes such as the production of hydrogen from nuclear energy, and improvements in their safety.	No
Activities related to fossil gases		
4	The company carries out, finances or has exposure to the construction or management of plants for the production of electricity that use gaseous fossil fuels.	No
5	The company carries out, finances or has exposure to the construction, redevelopment and management of combined heat/cold and electricity generation plants that use gaseous fossil fuels.	Yes
6	The company carries out, finances or has exposure to the construction, redevelopment and management of heat generation plants that generate heat/cold using gaseous fossil fuels.	Yes

Model 2 - Economic activities aligned with the taxonomy (denominator)

Line	Economic activities	Turnover						CapEx						OpEx					
		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and share of economic activity aligned with the taxonomy referred to in section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
2	Amount and share of economic activity aligned with the taxonomy referred to in section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
3	Amount and share of economic activity aligned with the taxonomy referred to in section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
4	Amount and share of economic activity aligned with the taxonomy referred to in section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
5	Amount and share of economic activity aligned with the taxonomy referred to in section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6	Amount and share of economic activity aligned with the taxonomy referred to in section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7	Amount and share of other economic activities aligned with the taxonomy not included in lines 1 to 6 in the denominator of the applicable KPI	55.00	0.00	55.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,781.60	0.24	3,781.60	0.24	0.00	0.00
8	Total applicable KPI	13,734,357.00	100.00	13,734,357.00	100.00	0.00	0.00	2,500,840.00	100.00	2,500,840.00	100.00	0.00	0.00	1,595,827.00	100.00	1,595,827.00	100.00	1,595,827.00	100.00

Model 3 - Economic activities aligned with the taxonomy (numerator)

Line	Economic activities	Turnover						CapEx						OpEx					
		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and share of economic activity aligned with the taxonomy referred to in section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
2	Amount and share of economic activity aligned with the taxonomy referred to in section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
3	Amount and share of economic activity aligned with the taxonomy referred to in section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
4	Amount and share of economic activity aligned with the taxonomy referred to in section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
5	Amount and share of economic activity aligned with the taxonomy referred to in section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6	Amount and share of economic activity aligned with the taxonomy referred to in section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7	Amount and share of other economic activities aligned with the taxonomy not included in lines 1 to 6 in the numerator of the applicable KPI	55.00	100.00	55.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,781.60	100.00	3,781.60	100.00	0.00	0.00
8	Total amount and share of economic activities aligned with the taxonomy in the numerator of the applicable KPI	55.00	100.00	55.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,781.60	100.00	3,781.60	100.00	0.00	0.00

Model 4 — Eligible economic activities not aligned with the taxonomy

Line	Economic activities	Turnover						CapEx						OpEx					
		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
2	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
3	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
4	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
5	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00	729.70	0.03	729.70	0.03	0.00	0.00	339.50	0.02	339.50	0.02	0.00	0.00
6	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	55.00	0.00	55.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	215.80	0.01	215.80	0.01	0.00	0.00
7	Amount and share of other economic activities eligible for but not aligned with the taxonomy not included in lines 1 to 6 in the denominator of the applicable KPI	829,183.00	6.04	829,183.00	6.04	0.00	0.00	77,953.83	3.12	77,953.83	3.12	0.00	0.00	104,328.25	6.54	98,988.25	6.20	5,340.00	0.33
8	Total amount and share of economic activities eligible for but not aligned with the taxonomy in the denominator of the applicable KPI	829,238.00	6.04	829,238.00	6.04	0.00	0.00	78,683.53	3.15	78,683.53	3.15	0.00	0.00	104,883.55	6.57	99,543.55	6.24	5,340.00	0.33

Model 5 – Economic activities not eligible for taxonomy							
Line	Economic activities	Turnover		CapEx		OpEx	
		Amount	Percentuale	Amount	Percentuale	Amount	Percentuale
1	Amount and share of economic activity referred to in line 1 of model 1 that is not eligible for the taxonomy in compliance with section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
2	Amount and share of economic activity referred to in line 2 of model 1 that is not eligible for the taxonomy in compliance with section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
3	Amount and share of economic activity referred to in line 3 of model 1 that is not eligible for the taxonomy in compliance with section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
4	Amount and share of economic activity referred to in line 4 of model 1 that is not eligible for the taxonomy in compliance with section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
5	Amount and share of economic activity referred to in line 5 of model 1 that is not eligible for the taxonomy in compliance with section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00
6	Amount and share of economic activity referred to in line 6 of model 1 that is not eligible for the taxonomy in compliance with section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00
7	Amount and share of other economic activities not eligible for the taxonomy not included in lines 1 to 6 in the denominator of the applicable KPI	12,900,825.00	93.93	2,410,895.90	96.40	1,481,785.57	92.85
8	Total amount and share of economic activities not eligible for the taxonomy in the denominator of the applicable KPI	12,900,825.00	93.93	2,410,895.90	96.40	1,481,785.57	92.85

Climate Change [ESRS E1]

Strategy

Disclosure Requirement E1-1 – Transition plan for climate change mitigation

[17]

The Group's environmental strategy is aimed at the **progressive decarbonization of its activities and those related to the supply chain**, through the adoption of innovative technologies and high-energy-efficiency resilient assets, the use of renewable energy, the promotion of circular models, and the purchase of solutions and products with a reduced and certified carbon footprint.

In 2022, in order to accelerate the reduction pathway of greenhouse gas emissions, TIM introduced into the ESG Plan the "Net Zero" target for 2040 and an intermediate target for 2030 relating to the reduction of value chain emissions. In the same year, the climate strategy was validated by the Science Based Targets initiative (SBTi), which confirmed its alignment with a trajectory compatible with containing the increase in global temperature within 1.5°C. In this context, the Group has committed to reduce absolute Scope 1 and 2 emissions by 75% by 2030 compared to 2019 and to reach 100% of electricity supply from renewable sources by 2025, the latter objective having been successfully achieved.

The years 2023 and 2024 represented a phase of significant methodological and organizational evolution. In 2023, the Group strengthened the scope 3 emissions calculation methodology, improving its robustness and reliability, with consequent effects on comparability with previous years. In 2024, the sale of the fixed network infrastructure assets to Kohlberg Kravis Roberts & Co. L.P. (KKR) resulted in a significant change in the operational perimeter, both in terms of the size of the assets and personnel, with significant impacts on the Group's emissions profile.

The significant changes in the Group's structure and activities have had an impact on the comparability of emission performance with respect to previous years and have made it necessary to identify a new baseline for monitoring progress. In this context, 2024 represents the new baseline year for measuring and monitoring the reduction of emissions and was the subject, in 2025, of further checks and methodological additions.

In 2025, TIM started updating its Transition Plan, with the aim of organically redefining the decarbonization trajectory and the related implementation measures, in line with the new industrial structure, with the recommendations of the Science Based Targets initiative (SBTi) and with the requirements of the ESRS Standards.

The Plan is currently in an advanced phase of definition and will be formalized and published during 2026, at the same time as the presentation of the 2026–2028 Business Plan, in order to ensure its consistent strategic alignment and integration into the Group's planning processes. In the meantime, the Group continues to implement the main emission-reduction levers already underway and confirms its commitment to the transition to a low-carbon business model.

Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

[E1 SBM-3 18, 19 a, b, c]

Material climate risks and resilience strategy

With reference to the climate risks that emerged from the double materiality analysis, the Group has identified a **transition risk** related to the evolution of energy regulations, which can lead to increased costs for the purchase of renewable energy and higher expenses for environmental compliance (IRO 21), and a physical risk linked to the intensification of extreme weather events, which can affect the service continuity and the integrity of infrastructures (IRO 31). The detail of the individual IROs is shown in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model" in the "General information" section.

In consideration of the infrastructural nature of the company's activities and the widespread distribution of assets throughout the territory, these risks are significant for the Group's business model, making a structured assessment of the resilience of the strategy and critical assets necessary.

The assessment is conducted as part of the Enterprise Risk Management (ERM) process, integrated into the Group's risk governance system. The process of identifying and assessing climate risks is consistent with what is described in the IRO-1 disclosure obligation "Description of the process to identify and assess the material impacts, risks and opportunities," to which reference is made for methodological details.

The climate change observed in recent years has led to an increase in the frequency and intensity of extreme weather events, including intense rain events (flash floods) and storms characterized by strong winds. In view of the widespread distribution of assets in the territory, the Group's business model is exposed to potential direct and indirect impacts on plants and the operational continuity of services, requiring a structured oversight of the resilience of critical assets.

The Enterprise Risk Management function, in collaboration with the Sustainability function, has developed a methodology dedicated to the assessment and monitoring of ESG risks, based on a Key Risk approach. For climate risks deemed strategic, the assessment is based on an integrated probabilistic framework, supported by statistical-mathematical models, which allows the risk exposure to be analyzed both at the single factor level and at the portfolio level, taking into account the correlations between the different risks.

The results of the analyses make it possible to elaborate probability distributions across multiple scenarios and to estimate the potential economic impacts associated with climate risks, including outcomes in extreme scenarios, supporting the assessment of the resilience of the Group's strategy and business model in different future climate contexts. The analysis considers scenarios with

differentiated outcomes, highlighting how variations in climate factors can influence business resilience and allowing the variability of outcomes between more favorable and more adverse scenarios to be observed.

With reference to **physical risks**, the Group uses dedicated quantitative tools, including the CLIMADA (CLIMate ADaptation) model², to assess the risk profile of assets and to monitor their evolution over time. These tools make it possible to estimate the potential loss associated with the occurrence of extreme weather events and to assess the vulnerability of the plants, also in order to guide strategic decisions regarding asset protection, business continuity and risk transfer to the insurance market.

The company also conducts periodic probabilistic analyses to estimate the potential direct loss resulting from the occurrence of adverse weather phenomena, such as river overflows, flash floods, landslides, fires and wind storms, assessing both the potential damage to assets and the possible impact on the continuity of services. These analyses contribute to the assessment of the resilience of the strategy and business model and support decisions on mitigation measures and insurance coverage.

For plants considered strategic or critical, quantitative assessments are accompanied by on-site analyses aimed at deepening the level of exposure and vulnerability of assets and strengthening prevention and adaptation measures.

The resilience analysis is carried out on the entire perimeter of the Group's assets and involves the main group companies, including TIM S.A and Telecom Italia Sparkle S.p.A., allowing a homogeneous and comparable assessment over time of the exposure to climate risks and the ability of the strategy and business model to adapt to the effects of climate change.

Assessment and updating of climate risk analysis

In line with the strategic planning process, the TIM Group carries out climate risk analysis on a cyclical basis to support the definition and updating of its resilience strategies.

The analysis is carried out within the Enterprise Risk Management system and is developed by the Enterprise Risk Management function in collaboration with the Sustainability function, according to a structured methodology integrated into the Group's decision-making processes and consistent with the main European regulatory references on sustainability.

The last update of the resilience analysis was carried out in conjunction with the definition of the 2024–2026 Strategic Plan, using the CLIMADA (CLIMate ADaptation) quantitative model.

Quantitative analyses are currently focused on the acute physical risks associated with natural disaster phenomena relevant to the Group, including floods, landslides, fires and wind storms, in consideration of the widespread distribution of assets and their relevance for the continuity of services.

The Company has conducted specific risk analyses taking into consideration two scenarios consistent with keeping global temperature below 1.5°C, from among those proposed by the “Network for Greening the Financial System, (NGFS) (see disclosure requirement E1 IRO-1 “Description of processes to identify and assess material climate-related impacts, risks, and opportunities” where the narratives, time horizons, parameters used, key forces and drivers of each scenario, and key inputs and constraints of the scenarios are provided).

The simulations are carried out using internationally recognized climate scenarios, in particular the RCP (Representative Concentration Pathways) scenarios - RCP 2.6 (strong mitigation scenario), RCP 4.5 (intermediate scenario) - which allow forward-looking assessments on the evolution of the frequency and intensity of climate hazards over time.

The Group is also evaluating the progressive extension of the analyses also to chronic physical risks and medium-long term climate scenarios, including the new generation IPCC scenarios (SSP1-2.6, SSP2-4.5, SSP5-8.5), to expand over time the assessment of the effects of climate change on strategy and business model.

Integration of climate risks into strategy and business model

The climate change resilience analyses conducted by the TIM Group make it possible to assess the exposure of infrastructure assets to extreme weather events and to estimate their potential direct and indirect economic impacts, helping to strengthen the adaptability of the strategy and business model in the medium to long term. The results derived from the scenario analysis are used to outline differentiated resilience profiles depending on the severity of the hazards, highlighting how more adverse scenarios can lead to higher levels of stress on assets and continuity of services and more robustly orienting strategic mitigation and adaptation measures as well as their priority for intervention.

The evaluations consider both the potential direct damage to physical assets (buildings, infrastructure, and technological equipment), and the indirect effects resulting from the interruption of services, including impacts on business continuity, possible reductions in revenues, and repercussions on end customers. The results of the analyses support the definition of climate risk prevention and mitigation plans and the identification of the most appropriate strategies for insurance coverage of residual risks.

In order to ensure the continuity of services and limit the potential effects of physical risks, the Group adopts specific adaptation measures, including flood protection systems, the geographical location of plants, the redundancy of critical infrastructure and the continuous monitoring of the climate risk profile of assets.

The resilience analyses also help to guide the Group's main areas of strategic action, in particular:

Products and services

- development and offering of digital solutions and resilient connectivity infrastructures, which support the continuity of services and favor operating models with less environmental impact;
- development of digital solutions enabling the ecological transition, such as cloud computing, smart working, telemedicine, and smart agriculture, also through the strengthening of the cloud business as a strategic lever to increase operational flexibility, optimization of the use of digital resources, and contribution to the reduction of energy consumption and emissions.

² Open source tool developed by the Swiss Competence Centre for Climate Change Research and Disaster Prevention (C2SM) and the Centre for Climate Risk and Resilience (OCCR), which analyzes the probability and intensity of extreme weather events, estimates the potential economic impact on infrastructure assets, builds impact curves and damage scenarios, and supports strategic assessments on resilience, asset protection, business continuity, and risk transfer to the insurance market.

Supply chain

- integration of ESG criteria and environmental requirements into procurement processes;
- evaluation and monitoring of suppliers' environmental performance through ESG audits and follow-up mechanisms for cases of non-conformity.

Research and Development

- investments in innovative solutions aimed at improving energy efficiency, the reduction of emissions and promoting circular economy models, strengthening the contribution of digitalization to the ecological transition.

Operations

- actions aimed at reducing the emission impact of network infrastructure and data centers, through the adoption of technologies that allow better performance with the same energy input;
- periodic review of the consistency of the operating model with the evolution of the climate scenario, also during the definition of the Strategic Plan.

Overall, the results of the resilience analyses confirm the central role of climate risk management in the evolution of the Group's strategy and in strengthening the sustainability and resilience of the business model in the medium to long term.

Impact, risk, and opportunity management

Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation

[24]; [MDR-P, 65 a, b, c, d, e, f]; [25 a, b, c, d, e]

The material IROs related to ESRS E1 “Climate change” are seven (7, 9, 13, 18, 21, 23 and 31). They are overseen through the “Commitment to Environmental Sustainability in the TIM Group” policy, the “Purchases of Products and Services” policy and the “TIM Group Code of Ethics and Conduct.”

The detail of the IROs is reported in the dedicated table of ESRS 2 SBM-3 “Material impacts, risks, and opportunities and their interaction with the strategy and business model”, in the “General Information” section, while for further information on the general aspects relating to policies, please refer to the chapter “Policies - MDR-P” of the same section.

To define the Group's framework in the Brazilian context, TIM S.A. has adopted specific policies to guide and manage the impacts on climate change. In particular, **TIM S.A.** has defined the **Policy “Climate change management,”** which addresses the issues of adaptation and mitigation of climate change, energy efficiency, and the use of renewable sources. The policy establishes the principles to be applied in the company's activities in order to ensure the correct and efficient management of greenhouse-gas emissions, in line with current legislation, the requirements of regulatory authorities and the Group's guidelines.

In TIM's “Commitment to Environmental Sustainability” policy, TIM reaffirms its commitment to:

- Mitigation of climate change, with the objective of reducing or preventing greenhouse-gas emissions to limit the magnitude of global warming. In line with the Policy, TIM defines long-term emission reduction targets in the business plan, promotes actions that reduce the amount of greenhouse gases and selects its suppliers and partners also based on environmental sustainability criteria;
- Adaptation to climate change, with the aim of reducing the vulnerability of the ecosystem to extreme weather events. With this in mind, TIM envisages measures to ensure the operational continuity of its infrastructures in the face of risks deriving from extreme weather events;
- Energy efficiency, implementing measures to improve the energy efficiency of its infrastructures and operations, thanks to the adoption of advanced technologies and sustainable management practices;
- The spread of renewable energy, promoting the use of sustainable energy sources in its operations and supply chain.

In the Policy “Purchases of Products and Services”, TIM integrates climate change issues into the different stages of the procurement process along the value chain. In particular, the Policy contributes to:

- climate change mitigation, integrating ESG criteria into the purchasing process, from qualification to tendering and contracting, and monitoring the environmental performance of suppliers during the contract execution phase, also for the purposes of Vendor Rating;
- adaptation to climate change by contributing indirectly to ensuring the continuity of supplies, through the oversight of supply risks;
- energy efficiency and the adoption of renewable energies, orienting, where appropriate, purchasing choices towards solutions that reduce energy consumption and favor the use of renewable sources, through requirements defined in the technical specifications, tender evaluations, and contractual clauses.

Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies

[28]; [MDR-A, 68 a, b, c, d, e]; [29 a, b]; [MDR-A, 69 a, b], [29 c i, ii, iii]; [16 c]

In addition to the climate change policies that provide the framework for the coherent and informed management of business activities, the Group implements actions and resources related to mitigation and adaptation to climate change and energy, focused on the following topics:

1. **Use of energy from renewable sources**
2. **Reduction of energy and fossil fuel consumption**
3. **Low-emission transport**
4. **Decarbonization of the supply chain**
5. **Additional emission mitigation initiatives**

The actions are aimed at various civil (such as offices) and industrial (such as Data Centers) business assets both in Italy and in Brazil, and involve internal operations and the value chain, especially in terms of the supply of electricity and the development of technological solutions for customers that make it possible to reduce emissions.

Where the project activities have been mapped within the scope of the taxonomic activities, the reference to the specific economic activity is reported. The actions, organized around the main decarbonization levers, are consistent with the strategies for reducing energy consumption and CO₂ emissions and are part of the definition of the Group's climate transition plan.

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Use of energy from renewable sources

1a. Purchase of electricity from renewable sources

■ **Renewable energy supply through Guarantees of Origin and Power Purchase Agreements**

In 2025, **100%** of the Domestic BU's **electricity supply** (environmental perimeter) comes from **renewable sources**, covered 91.91% through the purchase of Guarantees of Origin (GO) and 8.09% through Power Purchase Agreements (PPA).

For the purchase of GO, OpEx amounted to approximately €422 k, while the PPAs were equal to €128 k³.

■ **Renewable energy supply through International Renewable Energy Certificates I-REC (TIM S.A)**

In 2025 in Brazil, **38% of the electricity supply is covered by the purchase of I-REC**, certificates that attest to the renewable origin of the energy purchased.

For the purchase of I-REC, OpEx amounted to approximately €63 k.

1b. Self-production of electricity from renewable sources

■ **Production of electricity using solar photovoltaic technology, hydroelectric and bioenergy (TIM SA)**

In Brazil, in 2025, **62% of the energy** used **comes from owned renewable generation projects** that integrate photovoltaic, hydroelectric and biogas plants. The aim is to reduce dependence on fossil fuels, promote energy self-production and contribute to corporate decarbonization.

Energy production is based on a network of 134 small and medium-sized plants distributed throughout the country, powered exclusively by renewable sources. The predominant share of energy is produced by photovoltaic systems, which provide electricity for self-consumption and power for the company's operational sites (offices, mobile network and data centers), contributing to the improvement of energy efficiency and optimization of consumption. The active plants are divided as follows:

- 120 photovoltaic systems;
- 12 small hydroelectric plants;
- 2 biomass plants.

For these activities, also related to taxonomic activities 4.1, 4.5 and 4.8, the OpEx is equal to €38,712.25 k.

■ **Self-production of renewable energy for mobile network sites in remote areas (TIM S.A)**

In 2025, 140 antennas (+4.5% compared to 2024) powered by solar energy are active in remote and hard-to-reach accessible areas, in order to guarantee the continuity of connectivity in the most vulnerable regions and strengthen the resilience of the network with respect to the impacts deriving from the climate scenario.

■ **Self-generation of renewable energy for data centers**

In 2025, the photovoltaic systems installed at the data centers in West Milan and West Turin generated a total of 348 MWh of electricity, destined for self-consumption.

³ The value of €911 k relating to expenditure for the purchase of Guarantees of Origin (GO) published in the 2024 Sustainability Report was based on an estimate; following the finalization of the purchases, the actual expenditure amounted to €531 k.

All the actions in this paragraph contribute to the mitigation of the negative impact IRO 13 and risk IRO 21 as illustrated in the dedicated table in paragraph SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

2. Containment of energy and fossil fuel consumption

2a. Efficiency Interventions on Data Centers

In **Italy**, TIM has **16 data centers** in 8 cities that guarantee the highest levels of operation, security and energy efficiency, divided as follows:

- **7 Core Data Centers** offering maximum-performance cloud and colocation services;
- **6 Public Cloud Data Centers**, where the platforms of the leading international public cloud providers operate with the highest levels of performance;
- **3 micro-Data Centers** (service centers) that are secure and reliable, located close to customer sites.

In **Brazil**, TIM S.A. has **37 data centers** (35 network data centers and 2 IT data centers), distributed in over 20 Brazilian cities, to support core network functions and edge architectures.

■ **Self-generation and energy recovery in data centers**

- **High-performance cogeneration:** High-efficiency cogeneration (CAR) plants powered by natural gas are installed at the data centers in Padua, Bologna, Acilia, Pomezia, Rozzano, Roma Sud, Milano Sud, and Roma Ovest, intended for the combined production of electricity, heat, and cooling to serve IT infrastructures. Cogeneration technology allows the recovery and use of thermal energy generated in the electricity production process, achieving overall yields of more than 70–80% compared to the separate production of electricity and heat. This configuration optimizes the use of fuel and reduces the overall energy needs of sites with the same useful energy produced. In 2025, the total self-produced and self-consumed electricity was 7.76 GWh. The activity related to taxonomy (4.30) has *OpEx* for €339.50 k and *CapEx* €729.70 k.
- **Recovery and valorization of waste heat from data centers:** at the Rozzano data center, an integrated system of heat pumps and heat exchangers is operational that allows the recovery of waste heat generated by IT infrastructures and cogeneration plants and its introduction into the district heating network, for a total of 5.75 GWh of thermal energy valorized in 2025. The initiative makes it possible to optimize the use of the thermal energy produced by the site and to integrate the data centers into the territorial energy system, improving the overall efficiency of the energy cycle. The activities related to the taxonomy (4.16, 4.25 and 4.31) have *OpEx* for €647.40 k.

■ **Plant and technological upgrading of data centers infrastructures**

- **Modernization and replacement of technological systems:** in 2025, ordinary and extraordinary maintenance and modernization work was carried out on the systems serving the data centers, with particular reference to power supply and cooling systems, including the replacement of uninterruptible power supplies (UPS), refrigeration units, energy storage systems and components at the end of their useful life. The new solutions adopted have improved performance in terms of electrical efficiency and cooling performance coefficient, allowing the reduction of conversion losses, the increase in the efficiency of air conditioning systems and the optimization of energy consumption with the same installed IT capacity, while strengthening the reliability and operational continuity of the infrastructures. The activity related to taxonomy (7.3) has *OpEx* of €5.913 k and *CapEx* of €12.000 k.
- **Rationalization and modernization of IT infrastructures in the data centers:** in 2025, the Group carried out interventions to replace and consolidate data storage systems and to rationalize application workloads, with the aim of reducing energy consumption and the thermal load of IT infrastructures. In particular, the replacement and consolidation of 50 obsolete storage devices with 26 new generation systems at the Cesano, Bologna, Padua, Oriolo and Pomezia data centers was completed, improving the ratio between electricity consumption and installed capacity (kWh/TB) and reducing cooling needs. The estimated reduction in associated emissions compared to the previous configuration is 72.4%. Further timely updating of the storage equipment was also carried out at the Pomezia and Padua data centers and the migration of application workloads to more efficient infrastructures was initiated, able to dynamically optimize the use of computational resources, memory and storage, guaranteeing operational continuity of services. The activity related to the taxonomy (8.1) has *CapEx* for €60 k.
- **IT load energy optimization and infrastructure rationalization:** in 2025, the path of IT load efficiency continued through the migration of applications and workloads from on-premises infrastructures to cloud environments of third-party providers operating in data centers characterized by high standards of energy efficiency and the reallocation of systems to Group data centers with more advanced technological standards. In parallel, renovation and consolidation of data storage infrastructures and further technological updating activities were carried out, with the aim of reducing electricity consumption per unit of installed capacity and the associated thermal load, also helping to reduce cooling needs. The activity related to taxonomy (8.1) has *OpEx* for €23.915.44 k and *CapEx* for €16.405.30 k.

■ **Monitoring, control and certified energy management systems of data centers**

- **Continuous monitoring of Power Usage Effectiveness:** In 2025, continuous monitoring of the PUE was carried out in the Core and Public Cloud data centers with a level of use of IT infrastructures (IT load) exceeding 25% of the installed capacity, a threshold considered representative for the purposes of measuring energy efficiency. The detection system made it possible to monitor 97.4% of the total energy consumption of the data centers included in the analysis perimeter, compared to 59.1% in 2024, expanding the share of energy actually measured through structured detection tools. In Italy, the **average PUE**, which expresses the ratio between the total energy absorbed by the data centers and that actually used by the IT equipment, was **1.608**.

In **Brazil**, TIM S.A.'s data centers recorded an **average PUE of 1.58** in 2025, a reduction of 4% compared to 2024. Further reductions are expected upon completion of the divestment of the Santo André IT data centers in São Paulo, scheduled for 2026.

- **Certification of compliance with the European Code of Conduct for the energy efficiency of data centers:** In 2025, on-site audits were carried out by independent entities at the Group's main data centers as part of the European Code of Conduct for energy efficiency. As a result of the verifications, **11 data centers have obtained certification of compliance** with the technical guidelines provided by the Code, which define requirements regarding energy management, cooling systems, power supply, performance monitoring, and operational optimization. The certification attests to the alignment of the sites with recognized European technical standards and the adoption of a structured system for measuring and controlling energy performance. OpEx: €85.27 k.

In Brazil, TIM SA's data centers adhere to industry best practices, including the use of performance parameters and energy-saving technologies. (Taxonomic activity 8.1) For the efficient management of data centers: OpEx €29.947.56 k, CapEx €17.053.73 k.

The interventions described aim to improve energy efficiency through the use of technologies that allow better performance in order to reduce and mitigate the negative impacts described in IROs 7 and 18 and the risk described in IRO 31 related to ESRS E1 "climate change" within the scope of actions related to "Energy," "Mitigation of climate change," and "Adaptation to climate change". For the details of the IROs, please refer to the dedicated table in paragraph SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

2b. Efficiency interventions on fixed and mobile network infrastructure

■ **Infrastructural rationalization and decommissioning of obsolete equipment**

TIM continued implementing structural energy-efficiency measures on the fixed and mobile network infrastructure through the decommissioning of obsolete equipment and the rationalization of sites and network components. These interventions in 2025 generated energy savings of 6.28 GWh. CapEx €8.650 k.

■ **Migration of traffic towards 5G technology with high energy efficiency**

In 2025 TIM accelerated the technological evolution of the mobile network, favoring **the progressive migration of traffic towards 5G technology**, characterized by a level of energy efficiency per service unit significantly higher than previous generations. In this context, this includes the strategic agreement signed in November 2025 with Nokia, aimed at the expansion and modernization of the 5G network on the national territory. The agreement provides for the adoption of state-of-the-art radio solutions and network platforms, prepared for integration with advanced optimization and automation features, with positive effects both in terms of transmission capacity and overall performance.

The technological update allows for an increase in the volumes of traffic managed with the same energy consumption and to progressively reduce the energy absorbed per bit transported. In equivalent operating conditions, 5G in fact allows the transport of significantly higher traffic volumes than legacy technologies, with an improvement in energy efficiency per traffic unit of 0.41 W/bit, contributing to the reduction of the emission intensity of mobile infrastructures.

The effectiveness of the migration action is monitored through the ratio between traffic carried on the 5G network and total mobile traffic. In 2025, **5G traffic will account for 16% of total mobile traffic**. CapEx €192.200 k.

■ **Optimization of operational processes in network infrastructure - RAN Sharing Project (TIM S.A)**

The project involves a partnership between TIM and Vivo for the sharing of infrastructures, allowing the closure of redundant sites, with a significant reduction in operating expenses and emission impact. In 2025, the number of active shared sites (TIM + Live) was 6,858 and the number of deactivated sites was 3,933. OpEx €85,935.86 k.

■ **Energy efficiency of the fixed and mobile network (TIM S.A)**

The adoption of innovative technologies and solutions for the fixed and mobile network makes it possible to reduce energy consumption with the same managed traffic. The action aims to improve the eco-efficiency of data traffic, measured as the ratio between the service provided (bit) and the energy consumed (Joule). In 2025, eco-efficiency amounted to 22,501 bits/Joule, a decrease of 7.5% compared to 2024. Compared to 2019 (base year), however, the indicator shows an increase of 129%, exceeding the objective of the 2025-2027 ESG Plan which expected an improvement of 110%.

2c. Efficiency interventions on TIM Stores

The TIM sales network has **666 points of sale** dedicated to the marketing of fixed and mobile telephony offers, of which **236 are managed directly through TIM Retail**, 296 are franchised and 134 are single brand. The main interventions carried out during 2025 are described below.

■ **Relamping**

Replacement of halide light fixtures with LED panels with an estimated energy saving of about 3,010 kWh/year per point of sale. The actions affected 8 stores, adding to the previous 39 in 2023-24. Expense of €20 k (CapEx).

■ **Building automation**

Installation of devices for remote monitoring and control of lights, air conditioning, display windows, signs, and monitors, with alarms for out-of-range parameters and remote commands. The estimate of the reduction in consumption/year for each point of sale is 2,100 kWh/year. In 2025, the stores involved in the project rose to 13, increasing the total by 3 points of sale compared to the 10 affected in 2024. CapEx €47 k.

■ **New TIM store layout - Blue Vision Project**

In 2025, TIM continued the program of redevelopment of the commercial network through the "Blue Vision" project, aimed at integrating the renewal of the layout of the points of sale with structural interventions for energy efficiency and reduction of the environmental impact of retail property. The initiative involves the adoption of technological solutions with lower energy intensity, including high-efficiency lighting systems with savings of up to 15%, further optimized at night, the replacement of air conditioning systems with equipment with higher efficiency and refrigerant gases with lower global warming potential, as

well as the installation of LED monitors with reduced energy consumption, with energy consumption decreases of up to 20% compared to previous solutions. The project also includes the use of furnishings made with FSC- and EPD-certified materials and the introduction of digital labels based on e-ink technology, which allow for the reduction of paper use and its indirect impacts.

During 2025, the interventions involved a total of 68 points of sale (of which 8 started in 2024). The plan calls for 200 stores to be completed by 2027.

The financial resources used in 2025 amounted to 5.8 million euros of CapEx for the creation and opening of 60 points of sale during the year and €277 k of OpEx, relating to the share granted to entrepreneurs for the lease of commercial spaces, with the partners bearing the additional costs of adaptation.

3. Low-emission transport

The company fleet in Italy consists of **2.259 cars**, of which 1,978 for mixed use or with ad personam assignment, 202 operational and 79 in car sharing.

The following interventions are aimed at reducing operating costs, optimizing fuel consumption, and introducing lower-impact home-to-work commuting options; in 2025, the following interventions were carried out:

- **Electrification of the car sharing fleet**

The path of progressive electrification of the company's car sharing service continued, aimed at the reduction of direct emissions associated with the fleet. As of December 31, 2025, the fleet consists of 79 vehicles, of which 18% are full electric (14 BEVs and 65 internal combustion).

- **Electrification of the mixed-use car fleet**

The renewal of the car fleet for mixed use continued through the introduction of vehicles with lower emission intensity (Hybrid – EREV, PHEV, HEV, MHEV – and BEV), in line with the decarbonization path of the company fleet. As of December 31, 2025, out of a total of 1,978 vehicles, 51% are low-emission models, up 7% compared to 2024.

- **Preparation of the Home-Work Movement Plan (PSCL)**

In 2025, the Commuting Plan (Piano Spostamento Casa-Lavoro - PSCL) was prepared, based on the results of the Mobility Survey aimed at employees, with the objective of defining measures to optimize commuting and for the reduction of emissions associated with commuting.

- **Carpooling service via dedicated app (JO-JOB).**

Shared mobility service aimed at promoting the use of private cars among employees and reducing emissions associated with commuting. In 2025, the service is active in 8 locations (+2 compared to 2024), for a total of 7,229 employees potentially involved; at December 31, 2025, the membership rate was 4% (-1% compared to 2024).

- **Company shuttle service**

This is a collective transport service dedicated to employees, aimed at reducing the use of private cars and the emissions associated with commuting between home and work, through shared mobility solutions with a lower emission impact. The service is active in 12 locations, with a potential audience of 7,492 employees; at December 31, 2025, the rate of adherence to the booking web-app was 30% (+5% compared to 2024).

Overall, the expenses recorded for low-emission mobility initiatives amount to OpEx €7,335.07 k.

4. Decarbonization of the supply chain

TIM integrates ESG criteria into supply chain management processes in order to create greater engagement of suppliers on environmental issues and promote the improvement of their performance, with indirect effects on Scope 3 emissions associated with the goods and services purchased.

- **Development of products under the TIM Brand with EPD certification**

As part of the development of TIM-branded products, the company collaborates with qualified suppliers to create solutions with EPD (Environmental Product Declaration) certification, validated by a third party, which quantifies the product's carbon footprint along its life cycle and enables a more transparent measurement of emissions associated with purchases. Modems, which account for about 90% of branded products, are designed for durability, reusability, repairability, recyclability, and energy efficiency. At the end of 2025, two types of products with EPD certification are listed: TIM HUB, a modem/router for fixed networks, and TIM Antenna, an external device for receiving wireless signals in FWA connectivity solutions.

5. Additional climate change mitigation initiatives

The Group implements climate mitigation interventions based on nature-based solutions and mechanisms to compensate for residual emissions. These initiatives are aimed at absorbing or neutralizing climate-altering emissions, contributing to the strengthening of the company's climate strategy.

- **Urban greening intervention – Bio Forest®**

In 2025, an urban greening intervention was carried out in Rome at the Torrino Mezzocammino District, with the planting of 400 trees and shrubs using the BioForest® technique⁴. The intervention involves the use of native species selected based on

⁴ The planting initiative is part of the national afforestation campaign "Foresta Italia®" by Rete Clima, a non-profit organization that accompanies companies on sustainability and decarbonization paths, in partnership with Coldiretti and PEFC Italia.

the characteristics of the soil and the reference climatic context, with the aim of maximizing the ecosystem benefits and optimizing the absorption capacity of CO₂e_q in the medium-long term. The plants planted are capable of absorbing, over a 30-year life cycle, about 115 tCO₂e_q, or the equivalent of the emissions derived from the production of about 1,500 smartphones⁵.

■ **Offsetting of website emissions**

In order to offset the emissions associated with visits to the main websites, TIM is supporting for the fourth consecutive year an environmental project aimed at the reduction of emissions. In 2025, visits to the 21 main commercial and institutional websites in the Domestic sector generated over 505 tCO₂e_q. In response to these emissions, 505 carbon credits were purchased through the "The Envira Amazonia Project", a forest conservation initiative in Brazil certified according to the Verra standard (VCS), one of the main international standards for the quality of carbon credits. The project is aimed at protecting existing forests and preventing deforestation, avoiding the release of greenhouse gases from logging activities, but also includes interventions in favor of local communities, such as the construction and management of a medical and dental clinic, the installation of community toilets, and the distribution of kits for the prevention of water-related or insect-borne diseases. The initiative is part of the nature-based solutions, as it is based on the conservation of natural ecosystems for the mitigation of climate change, with environmental and social benefits for local communities.

The expenses recorded for further initiatives for the mitigation of climate change amount to 23.8 k euros OpEx.

The mitigation actions described contribute to achieving the Scope 1 and Scope 2 emission-reduction targets defined in the Business Plan and in the Group's climate strategy. In particular, initiatives such as the energy efficiency of the network, the progressive electrification of the fleet, and the procurement of electricity from renewable sources directly affect the Group's operational emissions.

These actions are integrated into the Group's industrial planning and multi-year investments, ensuring consistency between climate objectives, resource allocation and business development. The planning of financial resources is consistent with these objectives and supports the implementation of the mitigation initiatives described in this chapter.

At present, no information is available that would allow the punctual attribution of GHG-emission reductions to individual initiatives, nor to provide further financial breakdowns.

The total expenses identifiable for the actions covered by disclosure obligation E1-3 "Actions and resources relating to climate change policies" amount, gross of taxonomic activities, to €39,086.48 k (OpEx) and €235,912.00 k (CapEx) for the Domestic BU and to €154,658.67 k (OpEx) and €17,053.73 k (CapEx) for TIM S.A.; net of the portion attributable to taxonomic activities, these amounts are equal to €8,271.14 k (OpEx) and €206,717.00 k (CapEx) for the Domestic BU and to €85,998.86 k (OpEx).

To support the implementation of climate-mitigation and environmental-risk-management actions, the Group plans and allocates specific financial resources consistent with its transition strategy. In this context, the Group has developed a sustainable-finance plan providing for the issuance of dedicated bond instruments aimed at raising capital for environmental and social initiatives, including actions related to climate-change mitigation.

In Italy, a Sustainability Bond was issued in 2021, with a maturity of eight years and a residual notional amount of €499 million. As reported in the 2021 Sustainability Bond Report, the net proceeds were fully allocated to eligible categories under the 2020 Sustainability Financing Framework, including environmental initiatives consistent with the Group's climate objectives.

In Brazil, TIM S.A. issued in 2021 a Sustainability-Linked Bond for BRL 1.6 billion, financial instruments linked to the achievement of specific sustainability targets. These instruments contribute to ensuring the availability of the financial resources required to implement climate-mitigation actions, in line with the Group's environmental objectives and multi-year planning.

Metrics and targets

Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation

[MDR-T 81 a, b]

With reference to the Group's climate targets, the previously adopted objectives are being updated as part of the definition of the new business plan and the related transition plan. The new targets will be formalized and communicated during 2026, in line with the new strategic plan.

In the transitional period, the Group continues to regularly monitor the trend of its emission performance and the effectiveness of the reduction actions already initiated, ensuring continuity in the decarbonization trajectory. The relevant emission metrics, reported in the disclosure obligations E1-5 "Energy consumption and energy mix" and E1-6 "Gross Scope 1, 2, 3 GHG emissions and total GHG emissions", are subject to periodic detection and systematic monitoring within the scope of internal controls.

For the purposes of monitoring progress with respect to climate objectives, the Group uses in particular indicators relating to:

- greenhouse gas emissions Scope 1, Scope 2 and Scope 3;
- emission intensity with respect to the main operational and financial drivers;
- total energy consumption and share of energy from renewable sources;
- energy efficiency indicators of infrastructures, including those related to data centers.

For the results achieved with respect to the objectives of the previous Plan, please refer to paragraph ESRS 2 SBM-1 "Strategy, business model and value chain" of the "General Information" section.

⁵ The calculation was carried out thanks to the CO₂Web® methodology developed by Rete Clima, a non-profit organization specialized in promoting sustainability in organizations, and verified by the ICMQ Certification Body.

Disclosure requirement E1-5 - Energy consumption and energy mix

[MDR-M, 77 a]; [37 a, b]; [38]; [39]; [42]

The metrics related to energy consumption refer to the companies included in the Group's environmental perimeter (for details see BP-1 "General Criteria for Preparing the Sustainability Statement"). The data are expressed in megawatt-hours (MWh) and refer to the entire 2025 financial year.

The Group measures energy consumption according to standardized and internationally recognized methodologies. **The total consumption includes the energy purchased, the self-produced energy and the energy actually consumed during the reference period.** Self-produced and internally consumed energy is counted only once in their respective categories.

Total consumption includes: energy from fossil sources (including fuels, cogeneration, and the share of energy purchased from fossil sources); **energy from renewable sources** (including purchased energy, self-produced energy and renewable fuels) and **energy from nuclear sources**.

The share of nuclear energy is determined, where applicable, on the basis of the Residual Mix published by AIB (Association of Issuing Bodies) to attribute the generation mix to electricity not covered by Guarantees of Origin or purchase contracts from renewable sources (PPA). In 2025, it was not necessary to apply the Residual Mix, as the electricity purchased by the Group is entirely covered by electricity from renewable sources.

The Group, at a consolidated level, is not classified among the sectors with a high climate impact under the ESRS. However, at the individual entity level, the Olivetti and TIM Retail companies fall into these sectors and therefore provide a more detailed level of disclosure, with a breakdown of consumption by fossil sources and calculation of energy intensity, defined as the ratio between total energy consumption and net revenues.

The consumption and energy mix at the Group level are shown below.

[37] Energy consumption and mix - TIM Group

	UOM	2025	2024 ⁶
Total energy consumption from fossil sources	MWh	91,750.41	348,767.06
Energy from fossil sources consumption on total energy consumption	%	4.16	15.76
Total energy consumption from nuclear sources	MWh	—	8,626.89
Energy consumption from nuclear sources on total energy consumption	%	—	0.39
Total energy consumption from renewable sources	MWh	2,113,739.53	1,856,138.55
Energy consumption from renewable sources on total energy consumption	%	95.84	83.85
Fuel consumption from renewable sources	MWh	112,235.80	134,243.97
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	1,581,157.70	1,351,332.71
Consumption of self-generated renewable energy without relying on fuels	MWh	420,346.04	370,561.87
Total energy consumption related to own operations	MWh	2,205,489.94	2,213,532.50

In 2025, **the total energy consumption related to the Group's own operations is essentially stable** compared to the previous year (-0.4%).

While overall consumption remains substantially stable, a significant change in the energy mix is noted, characterized by **a marked reduction in consumption from fossil fuels** (-74% compared to 2024), mainly offset by an increase in consumption of energy from renewable sources and, to a marginal extent, by an increase in self-produced renewable energy.

In line with this reallocation, **the share of energy from renewable sources increased by 12%** compared to 2024, to represent 95.84% of total energy consumption, mainly thanks to the full coverage of electricity purchased through Guarantees of Origin, I-REC and renewable energy purchase agreements (PPA).

Below is the representation of the energy consumption and the mix with the breakdown of the energy consumption from fossil sources of TIM Retail S.r.l., operating in section G "Wholesale and retail trade", and Olivetti S.p.A., operating in section C "Manufacturing activities", both operating in sectors with a high climate impact, calculated on gross revenues.

⁶ The data relating to 2024 have been subject to correction with respect to what was previously published (see the disclosure obligation BP-2, 14a). In particular, the total consumption of energy from fossil sources has been updated, adjusted from 349,240.98 to 348,767.06 MWh; the relative percentages of incidence and the overall energy consumption of own operations were consequently adjusted.

[38] Energy consumption and mix of High Climate Impact Companies (Olivetti S.p.A. and TIM Retail S.r.l.)

	UOM	2025	2024
Total energy consumption from fossil sources	MWh	1,517.07	752.24
Fuel consumption from coal and coal products	MWh	0.00	0.00
Fuel consumption from crude oil and petroleum products	MWh	1,292.26	591.63
Fuel consumption from natural gas	MWh	224.80	160.61
Fuel consumption from other fossil sources	MWh	0.00	0.00
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	MWh	0.00	0.00
Consumption of fossil fuels over total energy consumption	%	28.79	17.58
Total energy consumption from nuclear sources	MWh	0.00	0.00
Energy consumption from nuclear sources on total energy consumption	%	0.00	0.00
Total energy consumption from renewable sources	MWh	3,753.23	3,525.69
Fuel consumption from renewable sources	MWh	0.00	0.00
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	3,753.23	3,525.69
Consumption of self-generated renewable energy without relying on fuels	MWh	0.00	0.00
Energy consumption from renewable sources on total energy consumption	%	71.21	82.42
Total energy consumption related to own operations	MWh	5,270.29	4,277.93

The variation in total energy consumption from fossil sources (+102% compared to 2024) is mainly due to the inclusion, in 2025, of the consumption of petrol and diesel for motor vehicles of the company TIM Retail, which in 2024 had not been accounted for due to unavailability of data.

Below is the Group's detail regarding the production of energy from renewable and non-renewable sources.

[39] Non-renewable and renewable energy production - TIM Group

	UOM	2025	2024 ⁷
Non-renewable energy production	MWh	33,649.95	90,552.23
Renewable energy production	MWh	420,346.04	370,561.88

In 2025, the production of energy from non-renewable sources recorded a 63% reduction compared to 2024. This reduction is mainly attributable to the non-operation, for more than half the year, of the trigeneration plants, due to the process of defining the ownership of the plants between TIM and FiberCop, following the spin-off finalized on July 1, 2024. The plants were subsequently returned to TIM's full ownership and it is expected that operations will resume in 2026. The residual production of non-renewable energy is attributable to the trigeneration plants still included in the Group's perimeter, intended for the energy needs of the data centers.

On the other hand, the production of energy from renewable sources recorded an increase of 13% compared to 2024, especially due to the contribution of TIM S.A., in line with the evolution of the Group's energy mix.

Below are the data relating to energy intensity.

[40], [41]: Energy intensity of activities in high climate impact sectors (Olivetti S.p.A. and TIM Retail S.r.l.)

	UOM	2025	2024
Total energy consumption from activities in sectors with a high climate impact	MWh	5,270.29	4,277.93
Net revenues from activities in high climate impact sectors used to calculate energy intensity	€mln	226.91	229.27
Energy intensity of activities in sectors with high climate impact	MWh/€mln	23.23	18.66

The energy intensity represents the ratio between the total energy consumption and the net revenues generated by the activities and expresses the energy needed to generate one million euros of net revenues. In 2025, energy intensity increases by 24.5% compared to 2024, mainly due to the increase in energy consumption against slightly declining revenues.

The revenues used for the calculation of energy intensity for companies with a high climate impact are consistent and reconcilable with the Group's consolidated revenues, as can be seen from the table below.

⁷ The figure for 2024 for "Non-renewable energy production" has been adjusted compared to what was previously published (see disclosure obligation BP-2, 14a), changing from 100,081.42 to 90,552.23 MWh.

[43]: Net revenues from activities in high climate impact sectors used for energy intensity

	UOM	2025	2024
Net revenues (environmental perimeter including discontinued operations) (1)	€mln	226.91	229.27
Net revenues (other, not related to environmental perimeter)	€mln	14,409.55	14,212.73
Total net revenues as per consolidated financial statements (including discontinued operations) (2)	€mln	14,636.46	14,442.00

Disclosure requirement E1-6 - Gross GHG emissions of Scope 1, 2, 3 and total GHG emissions

Summary of Gross Scope 1, 2 and 3 GHG Emissions

[MDR-M, 77 a]; [44]; [48 a,b]; [47]; [52 a, b]; [AR 41]

Gross greenhouse gases (GHG) emissions refer to the Group's environmental perimeter (see the BP-1 disclosure obligation). The data are expressed in metric tons of CO₂ equivalent (tCO₂eq) and refer to the entire 2025 financial year.

The **calculation** of the emissions inventory is carried out in **accordance with the Greenhouse Gas Protocol**, applying the "Corporate Accounting and Reporting Standard" for Scope 1 and Scope 2 emissions and the "Corporate Value Chain Accounting and Reporting Standard" for Scope 3 emissions.

Scope 2 emissions are reported according to both approaches provided by the GHG Protocol: Location-Based, which reflects the average emission factor of the national energy mix, and Market-Based, which considers the contractual methods of purchasing electricity. For the purposes of analyzing the decarbonization performance, the Group takes as its main reference the Market-Based approach, as it allows to represent the effect of supply choices and the use of energy from renewable sources.

Following the organizational discontinuity on 1 July 2024, the comparison is made exclusively with respect to the 2024 financial year, as the previous years are not comparable.

[44], [52 a, b]: Gross Scope 1, 2, 3 GHG Emissions - TIM Group

	UOM	2025	2024 ⁸
Gross Scope 1 GHG emissions	tCO ₂ eq	31,853.30	49,569.70
Gross Scope 2 Location-Based GHG emissions	tCO ₂ eq	302,249.37	350,081.45
Gross Scope 2 Market-Based GHG emissions	tCO ₂ eq	—	103,374.75
Gross Scope 3 GHG emissions	tCO ₂ eq	2,202,376.07	2,170,925.37
Total Scope 1, 2 and 3 Location-Based GHG emissions	tCO₂eq	2,536,478.74	2,570,576.52
Total Scope 1, 2 and 3 Market-Based GHG emissions	tCO₂eq	2,234,229.37	2,323,869.82

In 2025, the Group's total emissions are almost entirely attributable to **Scope 3**, which accounts for **99%** of the total, while **Scope 1** represents approximately **1%** and Scope 2 is zero under the market-based approach. Compared to 2024 (Scope 3: 93%, Scope 2: 4%, Scope 1: 3%), this indicates a greater weight of value-chain emissions.

Total gross GHG emissions (Scope 1, 2 and 3) decreased by approximately 4% compared to 2024 (market-based approach).

This change is attributable to:

- the **elimination of Scope 2 emissions** under the market-based approach or, under the location-based approach, to a reduction (approximately -14% compared to 2024) resulting from the procurement of electricity fully covered by Guarantees of Origin, I-RECs, and renewable energy purchase agreements (PPAs);
- the **reduction in Scope 1 emissions (-36%** compared to 2024) due to the reduced operation of trigeneration plants, changes in the allocation boundary of generators between TIM and FiberCop, and the decreased use of refrigerant and ozone-depleting gases;
- a **slight increase in Scope 3 emissions (+1.5%** compared to 2024), driven by higher procurement expenditure and increased energy production, transport, and distribution costs, which affected emissions associated with energy purchases.

Below are the Group's gross GHG emissions disaggregated by Scope 1, 2 and 3 for the Domestic BU and TIM S.A.

⁸ The data relating to 2024 have been rectified with respect to what was previously published (see the disclosure obligation BP-2, 14a). In particular, the gross Scope 1 GHG emissions were updated from 52,402.12 to 49,569.70 tCO₂eq and the gross Scope 3 GHG emissions from 2,025,399.85 to 2,170,925.37 tCO₂eq. The GHG emission totals have consequently been updated.

[AR 41] Gross Scope 1, 2 and 3 GHG emissions by Business Unit

UOM	2025						2024 ⁹						
	Scope 1	Scope 2 Location Based	Scope 2 Market Based	Scope 3	Scope 1+2+3 Location Based	Scope 1+2+3 Market Based	Scope 1	Scope 2 Location Based	Scope 2 Market Based	Scope 3	Scope 1+2+3 Location Based	Scope 1+2+3 Market Based	
TIM Domestic	tCO ₂ eq	18,435.57	290,368.65	—	1,622,171.90	1,930,976.12	1,640,607.47	30,917.93	333,801.94	103,374.75	1,516,648.06	1,881,367.93	1,650,940.74
TIM S.A.	tCO ₂ eq	13,417.73	11,880.72	—	580,204.17	605,502.63	593,621.90	18,651.77	16,279.51	—	654,277.32	689,208.60	672,929.09
Group	tCO₂eq	31,853.30	302,249.37	—	2,202,376.07	2,536,478.74	2,234,229.37	49,569.70	350,081.45	103,374.75	2,170,925.37	2,570,576.53	2,323,869.82

In 2025, the **emissions impact** (Scope 1+2+3) of **TIM S.A.** on the Group's total shows a slight decrease, falling from 29% in 2024 to **27%** in 2025. This trend reflects Scope 2 emissions that have already been reduced to zero since 2021, as well as a reduction in both Scope 1 and Scope 3 emissions over the reference period.

Summary of Gross Scope 1 and 2 GHG Emissions

[44]; [50 a, b]

Below are the Scope 1 and Scope 2 emissions of the TIM Group, referring to the environmental perimeter and disaggregated according to the type of control exercised over the activities, in accordance with the Greenhouse Gas Protocol.

The Group exercises **financial control** over owned buildings and infrastructure, as well as property and infrastructure held under lease agreements which, for accounting purposes (IFRS 16 – Leases), are recorded in the financial statements as right-of-use assets. The related emissions are therefore included in the reporting perimeter.

Operational control is exercised over property and infrastructures not owned and not recorded in the annual report (IFRS 16), for which the Group has energy utilities, can directly purchase energy (also from renewable sources), and is able to influence the methods of use or investments related to the assets.

[44], [50 a, b]: Gross GHG emissions disaggregated by control type - Scope 1 and 2 - TIM Group

UOM	2025	2024 ¹⁰	
Gross Scope 1 GHG emissions	tCO₂eq	31,853.30	49,569.70
from activities with financial control	tCO ₂ eq	29,404.43	45,121.91
from activities with operational control	tCO ₂ eq	2,448.86	4,447.79
Gross Scope 2 Location-Based GHG emissions	tCO₂eq	302,249.37	350,081.45
from activities with financial control	tCO ₂ eq	102,013.10	112,462.22
from activities with operational control	tCO ₂ eq	200,236.28	237,619.23
Gross Scope 2 Market-Based GHG emissions	tCO₂eq	—	103,374.75
from activities with financial control	tCO ₂ eq	—	5,230.99
from activities with operational control	tCO ₂ eq	—	98,143.76
Total Scope 1 and 2 Location-Based GHG emissions from financial control	tCO₂eq	131,417.53	157,584.13
Total Scope 1 and 2 Market-Based GHG emissions from financial control	tCO₂eq	29,404.43	50,352.90
Total Scope 1 and 2 Location-Based GHG emissions from operational control	tCO₂eq	202,685.14	242,067.02
Total Scope 1 and 2 Market-Based GHG emissions from financial control	tCO₂eq	2,448.86	102,591.55

In 2025, the **Group's gross Scope 1 and Scope 2 GHG emissions decreased** compared to 2024, both under the **Location-Based approach (approximately -16%)** and under the **Market-Based approach (approximately -79%)**; a detailed breakdown of the change is provided in the following sections dedicated to the individual scopes.

Gross Scope 1 GHG emissions

[MDR-M, 77 a]; [48 a, b]; [AR 43c]

The Group's gross **Scope 1 GHG emissions** derive from the use of fuels (such as **gas, petrol, and LPG**) and from **fugitive emissions** associated with operational activities (such as **refrigerant gas leaks from air conditioning systems**). The data are expressed in metric tons of CO₂ equivalent (tCO₂eq) and refer to the entire 2025 financial year.

For **TIM Domestic**, Scope 1 emissions mainly derive from:

- stationary combustion from fixed installations, particularly from the use of diesel for **generators**, natural gas for **heating**, and self-generation of electricity through high-efficiency **cogeneration units**;

⁹ The data relating to 2024 have been revised compared to what was previously published (see the disclosure obligation BP-2, 14a). In particular, the gross Scope 1 GHG emissions of the Domestic BU were updated from 33,750.35 to 30,917.93 tCO₂eq, with a consequent adjustment of the gross Scope 1 emissions for the total Group. The gross Scope 3 GHG emissions of the Domestic BU – from 1,439,960.93 to 1,516,648.06 tCO₂eq – and of TIM S.A. – from 585,438.92 to 654,277.32 tCO₂eq – were also updated, resulting in the adjustment of the Total Group gross Scope 3 emissions. The aggregate Scope 1+2+3 totals, according to both Location-Based and Market-Based approaches, have been updated accordingly.

¹⁰ The data relating to 2024 have been revised compared to what was previously published (see the disclosure obligation BP-2, 14a). In particular, the gross Scope 1 GHG emissions from activities with operational control were updated from 7,280.21 to 4,447.79 tCO₂eq, resulting in an update of the total Scope 1 emissions and the total Scope 1 and 2 emissions.

- mobile combustion, related **to vehicle use**;
- fugitive emissions, due to the release of refrigerant and ozone-depleting gases contained in air conditioning systems.

For **TIM S.A.**, in addition to the types described above, Scope 1 also includes:

- emissions from **biogas consumption**;
- process emissions associated with **effluents**, generated from wastewater treatment;
- **fugitive emissions** related to fire extinguisher refilling, due to the release of fire-extinguishing gases during maintenance operations of fire protection systems.

The calculation of CO₂ equivalent emissions is carried out by applying the Global Warming Potential (GWP) provided for by the VI IPCC Report, which compares the climate impact of the different gases with that of carbon dioxide (CO₂), to which a GWP of 1 is attributed.

The emission factors used are those published by DEFRA 2025 (Department for Environment, Food and Rural Affairs).

The calculation of Scope 1 emissions excludes any absorptions, emission allowances or carbon credits purchased, sold or transferred. The Group does not fall within the scope of the EU ETS.

Emissions are classified into the categories of stationary combustion, mobile combustion, process emissions and fugitive emissions, based on activity data relating to fuel consumption and gas losses.

[48a] Type of GHG emissions included in Scope 1 - TIM Group

	UOM	2025	2024 ¹¹
Emissions by stationary combustion	tCO₂eq	10,639.26	22,447.25
emissions from trigeneration	tCO ₂ eq	5,569.57	17,153.66
heating emissions	tCO ₂ eq	3,411.06	3,659.49
emissions from the self-generation of electricity from mixed sources ¹	tCO ₂ eq	1,658.64	1,634.10
Mobile combustion emissions	tCO₂eq	9,930.04	9,827.48
emissions from haulage	tCO ₂ eq	8,050.35	7,911.47
emissions from machinery used for plant maintenance and cleaning	tCO ₂ eq	1,879.69	1,916.01
Process emissions	tCO₂eq	1.01	—
emissions from effluents	tCO ₂ eq	1.01	—
Fugitive emissions	tCO₂eq	11,282.99	17,294.97
emissions from the dispersion of ozone-depleting gases	tCO ₂ eq	11,282.99	17,294.97
Total Scope 1 emissions	tCO₂eq	31,853.30	49,569.70

⁽¹⁾ includes diesel emissions from generators

In 2025, **gross Scope 1 emissions recorded a 36% reduction** compared to 2024. The decrease is mainly attributable to the decrease in emissions from stationary combustion, which are reduced by 53% compared to the previous year, in particular due to the reduced operation of trigeneration plants. Fugitive emissions, mainly associated with the dispersion of refrigerant gases, also show a 35% reduction, contributing to the overall decrease in Scope 1 emissions.

In line with the provisions of the GHG Protocol, biogenic CO₂ emissions, resulting from the combustion or biodegradation of biomass, are not included in Scope 1 and are reported separately from greenhouse gas emissions of fossil origin.

[AR 43c] Biogenic emissions not included in Scope 1 - TIM Group

	UOM	2025	2024 ¹²
Biogenic emissions of CO ₂ from the combustion or bio-degradation of biomass separately from the Scope 1 GHG emissions	tCO ₂ eq	22,358.69	26,745.85

In 2025, there was a **16.4% reduction in emissions of biogenic origin** compared to 2024, mainly attributable to the decrease in the consumption of biogenic fuels used by the Group's plants.

In calculating Scope 1 greenhouse gases (GHG) emissions, the TIM Group does not use or consider emissions covered by regulated Emission Trading Systems (ETS). The Group's operating activities, in fact, do not fall within the scope of application of these systems and are not subject, at the reporting date, to obligations to purchase or return emission allowances. The reported Scope 1 emissions are gross and not subject to regulated exchange or compensation mechanisms.

¹¹ The data relating to 2024 have been rectified with respect to what was previously published (see the disclosure obligation BP-2,14a). In particular, the emissions for stationary combustion from trigeneration - from 16,821.22 to 17,153.66 tCO₂eq-, from heating - from 3,734.21 to 3,659.49 tCO₂eq - and from electric self-production from mixed sources - from 2,135.61 to 1,634.10 tCO₂eq- were updated, resulting in the adjustment of the total emissions for stationary combustion. In addition, fugitive emissions from the dispersion of ozone-depleting gases were updated from 19,883.61 to 17,294.97 tCO₂eq. Total Scope 1 emissions were consequently adjusted from 52,402.12 tCO₂eq to 49,569.70 tCO₂eq.

¹² The data relating to 2024 have been rectified with respect to what was previously published (see the disclosure obligation BP-2, 14a). In particular, the biogenic CO₂ Scope 1 emissions were updated from 166.02 to 26,745.85 tCO₂eq.

Gross Scope 2 GHG emissions

[MDR-M, 77 a]; [49 a, b]

The gross **Scope 2 GHG emissions** of the TIM Group, expressed in tons of CO₂ equivalent (tCO₂eq), **resulting from the purchase of electricity**, are reported by distinguishing between the Location-Based method and the Market-Based method.

According to the **Location-Based approach**, emissions are calculated by applying the national average emission factors of the electricity grid of the countries where the energy is consumed. As part of the Domestic BU, the ISPRA 2024 databases for Italy, Terna 2024 for Turkey and Panama and AIB 2024 for Greece are used. For TIM S.A. the quantification is based on the average emission factor of the National Interconnected System (SIN), in accordance with the Brazilian Greenhouse Gases Emissions Management Program (PBGHGP). This method reflects the indirect emissions associated with the average national electricity generation mix.

According to the **Market-Based approach**, emissions are determined considering the specific contractual instruments for the supply of renewable energy. In particular, for the Domestic BU, 91.91% of the energy purchased is covered by Guarantees of Origin and 8.09% by a Power Purchase Agreement with ERG for the supply from wind power plants, with a total coverage equal to 100% of the energy purchased, while TIM S.A. covers 100% of its consumption through Renewable Energy Certificates (I-RECs).

[49 a, b]: Gross Scope 2 GHG Emissions - TIM Group

	UOM	2025	2024
Gross Scope 2 Location-Based GHG emissions	tCO ₂ eq	302,249.37	350,081.45
Gross Scope 2 Market-Based GHG emissions	tCO ₂ eq	0.00	103,374.75

In 2025, **Scope 2 emissions** calculated according to the **Location-Based approach** show a **reduction compared to 2024 (-13.6%)**, mainly due to the decrease in electricity consumption and the improvement of the national generation mix in the Group's countries of operation.

Under the **Market-Based approach**, in 2025 emissions were reduced to zero (-100% compared to 2024), in line with the choice of full coverage of electricity supply through contractual instruments of certification from renewable sources (Guarantees of Origin, PPAs and I-RECs).

Gross Scope 3 GHG emissions

[MDR-M, 77 a]; [51]

The gross Scope 3 GHG emissions of the TIM Group are reported in accordance with the Corporate Value Chain (Scope 3) Accounting and Reporting Standard of the Greenhouse Gas Protocol (2011).

In 2025, the Group **expanded the reporting perimeter of Scope 3 emissions** compared to the previous year, **including all applicable categories** along the upstream and downstream value chain, **with the exception of Categories 8** ("Upstream leased assets") **and 10** ("Processing of products sold"), which are not relevant in relation to the Group's operating model.

The expansion of disclosure compared to 2024 aims to ensure greater completeness and robustness of disclosure. The year 2024 is the reference for the definition of the climate transition plan currently under development.

The reporting perimeter includes companies falling within the environmental perimeter (see the BP-1 disclosure obligation). Any offsets, GHG allowances, or carbon credits purchased, sold, or transferred are excluded from the calculation. Emissions are estimated using activity data along the value chain; unless otherwise indicated, no primary data provided directly by the value chain partners has been used.

Below are the main calculation methodologies adopted by category.

■ Category 1 - Purchased goods and services

For the Domestic BU the prevailing calculation methodology is based on expenditure (spend-based approach). Specifically, the purchase items by commodity group (net of intercompany items) recorded by SAP¹³ systems were used, including expenses for the management of telecommunications services (such as leases, management of spaces and infrastructures of third parties, and colocation services). The conversion of monetary values into emissions was carried out using EEIO-Eurostat emission factors.

For the other companies in the environmental perimeter¹⁴ not detected by SAP, the items in the consolidated financial statements relating to "Purchases of goods and services" were used, applying average emission factors derived from the sample of available data.

For specific product categories such as devices, the Average Data Method was applied, based on the quantities purchased and on sector emission factors.

A spend-based methodology was also adopted for TIM S.A., using purchase items by goods group (net of intercompany items) and certified expense accounting items. EEIO-Eurostat emission factors were applied for the conversion into emissions. For the purchase of devices, the Average Data Method was applied.

■ Category 2 - Capital goods

For the Domestic BU, a spend-based approach was adopted, using the investment items by goods group (approved amounts net of intercompany items) of the companies included in the environmental perimeter, recorded by SAP systems (see note 13).

¹³ TIM S.p.A.; Telecontact Center S.p.A.; Telecom Italia Sparkle S.p.A.; TI Sparkle Turkey; Olivetti S.p.A. and Noovle S.p.A.

¹⁴ TI Sparkle Greece; Telsy S.p.A.; Panama Digital Gateway and TIM Retail S.r.l.

Investments related to the management of telecommunications services provided by third parties are also included. The conversion of monetary values into emissions was carried out by applying emission factors published by Eurostat.

For the other companies within the environmental perimeter (see Note 14), investment data were taken from the items in the consolidated financial statements relating to investments (CapEx), to which average emission factors derived from the sample of available data were applied.

A methodology based on expenditure was also adopted for TIM S.A., using certified investment items (net of intercompany items). The conversion into emissions was carried out by applying emission factors relating to the type of purchase published by Eurostat.

■ **Category 3 – Fuel and energy related activities (not included in Scope 1 and 2)**

For the Group, an activity-based approach was adopted, applying to the energy consumption reported in Scope 1 and Scope 2 specific emission factors aimed at estimating the upstream emissions associated with the production of fuels and electricity purchased, as well as network losses. For both the Domestic BU and TIM S.A., emission factors taken from the DEFRA 2025 database were used for the components related to electricity transmission and distribution losses (renewable and non-renewable), as well as from the DEFRA 2021 database for emissions associated with the extraction, refining, and transport phases of primary fuels prior to electricity generation.

■ **Category 4 – Upstream transportation and distribution**

For the Domestic BU, a hybrid methodology has been adopted that combines an expense-based approach to purchased transport services with a distance-based approach to product handling. The calculation considers, where available, the weight of the goods transported, the distances travelled and the modes of transport used. A similar methodology has been adopted for TIM S.A.; where available, data on fuel consumption provided by logistics operators have been integrated.

Both for the Domestic BU and for TIM S.A., the reference emission factors and their respective densities were used, extracted from the GLEC Framework, Global Logistics Emission Framework v3.1 (published March 2025).

■ **Category 5 – Waste generated in operations**

For all group companies, the "Average Data Method" was applied, considering the quantities of waste and the related treatment methods (recycling, landfill, incineration). In the absence of specific data, estimated distributions consistent with sectoral sources (e.g. ISPRA) were used. The emission factors derive from the DEFRA 2025 database.

■ **Category 6 – Business travel**

For all group companies, an activity-based approach was used, considering the distances traveled, the modes of transport used, and the overnight stays, based on data extracted from corporate travel management systems. The emission factors come from the DEFRA 2025 database.

■ **Category 7 – Commuting**

For the Domestic BU, a methodology was adopted based on internal surveys relating to modes of travel, average distances traveled, and the use of smart working, extended to the entire company population. Emissions were estimated by applying emission factors to the different transport modes declared. For TIM S.A., a methodology was adopted based on company data relating to smart working and on estimates of movements by type of means of transport, elaborated on the basis of national statistics referring to the Brazilian context. For both companies, the emission factors are taken from the DEFRA 2025 database.

■ **Category 9 – Downstream transportation and distribution**

For the Domestic BU, the calculation was carried out using a distance-based approach, which considers the weight of shipments, a standard average distance for the distribution of products to customers, and the modes of transport used. For TIM S.A., a similar methodology has been applied which, in the absence of precise data on the weight of shipments, uses average weights of the products sold.

For both realities, the emission factors and their densities were taken from the GLEC Framework – Global Logistics Emission Framework v3.1 (March 2025).

■ **Category 11 – Use of sold products**

For the Domestic BU, a methodology has been adopted that estimates the emissions generated in the use phase of the products sold. Given the wide range of products marketed, the focus was on the most relevant categories in terms of sales volumes and the average emission impact by product category. Emissions were determined by multiplying the average energy consumption of the product by its average useful life and applying the Location-Based emission factor of electricity. The ISPRA 2024 emission factor (published on May 7, 2025).

For TIM S.A., a similar methodology was applied, while the average emission factor of the National Interconnected System (SIN), published in December 2025 under the responsibility of the Ministries of Science and Technology (MCTI), was applied.

■ **Category 12 – End of life of products sold**

For all group companies, a methodology was adopted to estimate the emissions associated with the disposal phase of the products sold, applying the Average Data Method. Given the wide range of products marketed, average weights were determined by product category and sector estimates were applied relating to the prevailing end-of-life treatment methods for each asset. The emission factors used refer to DEFRA 2025.

■ **Category 13 – Leased Assets**

For the Domestic BU, emissions are estimated on the basis of the average energy consumption of the leased goods over their useful life, applying location-based emission factors for electricity published by ISPRA 2024 (published on May 7, 2025). For TIM S.A. the methodology is similar, while the emission factors are location-based and refer to the National Interconnected System (SIN), published in December 2025 under the responsibility of the Ministries of Science and Technology (MCTI).

■ **Category 14 – Franchises**

For the Domestic BU, emissions are estimated on the basis of the number of franchise points of sale, average surface area and energy consumption. The emission factors applied are the national location-based electricity emission factors published by ISPRA 2024. For TIM S.A., a similar methodology was adopted, while the emission factors are the national location-based ones related to the National Interconnected System (SIN), published in December 2025 under the responsibility of the Ministries of Science and Technology (MCTI).

■ Category 15 – Investments

For all group companies, a methodology based on average data (Average Data Method) was adopted, estimating emissions in proportion to the shareholding held, using the turnover of the investee companies (year x-1) and applying EEIO-Eurostat reference emission factors, with currency conversion where necessary.

There are no biogenic CO₂ emissions along the value chain, upstream or downstream. Scope 3 GHG emissions are reported gross of any removals and do not include offsets, GHG allowances, or carbon credits purchased, sold, or transferred.

[51]: Gross Scope 3 GHG Emissions - TIM Group

	UOM	2025	2024 ¹⁵
1. Purchasing of goods and services	tCO ₂ eq	1,563,689.88	1,507,169.99
2. Purchase of capital goods	tCO ₂ eq	310,727.26	303,900.22
3. Fuel and energy related activities (not included in Scope 1 or 2)	tCO ₂ eq	35,688.75	28,255.83
4. Upstream transport and distribution	tCO ₂ eq	23,770.48	30,711.59
5. Waste	tCO ₂ eq	57.24	101.62
6. Business trips	tCO ₂ eq	4,990.21	5,240.41
7. Commuting	tCO ₂ eq	21,306.87	25,986.75
9. Downstream transport	tCO ₂ eq	5.47	8.44
11. Use of products sold	tCO ₂ eq	153,754.04	186,054.21
12. End-of-life treatment of sold products	tCO ₂ eq	21.41	19.60
13. Emissions from downstream leased assets	tCO ₂ eq	63,586.96	67,978.11
14. Franchising	tCO ₂ eq	2,099.28	2,548.47
15. Investments	tCO ₂ eq	22,678.20	12,950.13
Total gross Scope 3 GHG emissions	tCO₂eq	2,202,376.07	2,170,925.37

In 2025, gross **Scope 3 emissions recorded a slight increase compared to the previous year (+1.5%)**. Analyzing the most significant categories in terms of emissions, Category 1 and Category 2 show increases of 3.8% and 2.2%, respectively, compared to 2024. These changes mainly reflect trends in operating expenditure and investments, as well as the infrastructure projects carried out during the period.

Emissions in **Category 3 also show an increase of 26%** compared to 2024, mainly due to the inclusion of network losses related to the supply of renewable energy, in accordance with the ISO 14064 standard.

Partially offsetting these dynamics is the **reduction in Category 11 emissions by 17.4%** compared to 2024, attributable to changes in the volumes and mix of devices sold, as well as the progressive improvement in the energy efficiency of products.

Emissions intensity

[MDR-M, 77 a]; [53]; [55]

Below is the value of the GHG intensity of the TIM Group (environmental perimeter) in metric tonnes of CO₂eq. The intensity of GHG emission is an indicator of emission efficiency and is measured in tCO₂EQ per million euros of revenues. The indicator is calculated by comparing the total greenhouse gases emissions to the net revenues of the companies belonging to the environmental perimeter. The indicator is presented according to both the Location-Based and Market-Based approaches.

[53]: GHG Intensity - TIM Group

	UOM	2025	2024 ¹⁶
Total Location-Based GHG emissions	tCO ₂ eq	2,536,478.74	2,570,576.52
Total Market-Based GHG emissions	tCO ₂ eq	2,234,229.37	2,323,869.82
Net revenues environmental perimeter (gross of discontinued operations) ¹	€mln	14,440.99	14,207.38
Intensity of Location-Based GHG emissions	tCO₂eq/€mln	175.65	180.93
Intensity of Market-Based GHG Emissions	tCO₂eq/€mln	154.72	163.57

⁽¹⁾ Discontinued operations - environment perimeter: Telecom Italia Sparkle S.p.A.; TI Sparkle Greece; TI Sparkle Turkey and Panama Digital Gateway

In 2025 the indicator shows an improvement compared to 2024 with a reduction of 2.9% according to the Location-Based approach and 5.4% with the Market-Based approach. The improvement in the indicator reflects the combination of the substantial stability of overall emissions and the increase in revenues from the environmental perimeter in the reference period, with a

¹⁵The data relating to the 2024 financial year have been integrated, as indicated in section BP-2 [13a], for the purposes of CSRD reporting, including the calculation of the additional previously unpublished Scope 3 categories (Categories 4, 5, 6, 7, 9, 13, 14, and 15), in order to ensure full comparability with the 2025 financial year.

¹⁶Data for 2024 have been adjusted, as indicated in section BP-2 [14a]. The table shows the updated values of total Location-Based and Market-Based GHG emissions and the related intensity indicators.

consequent reduction in emissions per unit of revenue. The more favorable trend in intensity calculated according to the Market-Based approach is also attributable to the elimination of Scope 2 emissions according to this methodology, compared to the full coverage of electricity consumption through renewable energy procurement instruments.

[55]: Reconciliation with financial statements - TIM Group

	UOM	2025	2024
Net revenues (environmental scope including discontinued operations) ¹	€mln	14,440.99	14,207.38
Net revenues (other, not related to environmental perimeter)	€mln	195.47	235.00
Total net revenues as per consolidated financial statements (including discontinued operations)²	€mln	14,636.46	14,442.00

⁽¹⁾ Environmental perimeter 2025: TIM S.p.A.; Olivetti S.p.A.; Noovle S.p.A.; Telsy S.p.A.; Telecontact Center S.p.A.; TIM Retail S.r.l.; Telecom Italia Sparkle S.p.A.; TI Sparkle Greece; TI Sparkle Turkey; Panama Digital Gateway and TIM S.A.

⁽²⁾ Discontinued operations: Sparkle Group

Disclosure Requirement E1-7 - GHG removals and GHG mitigation projects financed through carbon credits

[MDR-M 77 a]; [56 a, b]; [58 a, b, e, f]; [60]; [61 a, b, c]

The TIM Group does not carry out removal or storage activities of GHG deriving directly from its own operations or from the upstream and downstream value chain. Emission neutralization, both for specific components of the value chain and for emissions from its own activities, is achieved outside the value chain through the purchase of certified carbon credits, about which the Group provides adequate disclosure.

As part of the Domestic BU, in 2025 the emissions associated with browsing the main commercial and institutional websites, equal to over 505 tCO₂eq, were offset through the purchase of 505 carbon credits related to the "The Envira Amazonia Project", a forest conservation initiative located in Brazil and based on avoided deforestation activities. The project is aimed at preserving existing forests and preventing deforestation resulting from logging activities, generating a measurable reduction in emissions and supporting sustainable economic development programs. The initiative also includes interventions in favor of local communities, including the construction and management of a medical and dental clinic, the installation of community toilets and the distribution of kits for the prevention of water-related or insect-borne diseases.

The "The Envira Amazonia Project" is certified according to the VCS Standard (Verified Carbon Standard) – Verra, which ensures the generation of real, verifiable, and permanent CO₂ reductions, and has also obtained validation and verification of CCBS (Climate, Community & Biodiversity Standard) with Triple Gold Level Distinction, for the exceptional positive impact in terms of climate change mitigation, support for local communities, and protection of biodiversity.

The calculation of avoided emissions and carbon credits to be purchased follows the CO2web® methodology owned by Rete Clima, a nonprofit technical body specializing in promoting sustainability in organizations, and is verified by the ICMQ Certification Body. As the project is located in Brazil, the purchased carbon credits were not generated within the European Union.

The neutralization activity of the emissions associated with the websites has been the subject of specific public disclosure, with an indication of the compensation methods adopted.

In Brazil, TIM S.A. carries out the neutralization of direct emissions of GHG (Scope 1) through the purchase of certified carbon credits. In 2025, 13,418 credits were purchased. Project selection was carried out on the basis of recognized certification criteria and the ability to generate environmental and social benefits for local communities.

Resource use and circular economy [ESRS E5]

Impact, risk, and opportunity management

Disclosure Requirement E5-1 – Policies related to resource use and circular economy

[14, 16]; [MDR-P, 65 a, b, c, d, e, f]; [15 a,b]

The double materiality analysis identified **2 material IROs** (IROs 28 and 37) related to ESRS E5-1 "Resource use and circular economy", both referring to the Group's own operations. These IROs are monitored through the policy "**Commitment to environmental sustainability in the TIM Group**" and in the "**Waste Management Procedure**".

The detail of the IROs is reported in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section, while for further information on the general aspects relating to policies, please refer to the "Policies - MDR-P" chapter in the same section.

To define the Group's framework in the Brazilian context, TIM S.A. has adopted an "Environmental Policy" consistent with the Group's principles and guidelines and with the applicable local legislation.

The Policy guides company activities towards improving environmental performance, mitigating environmental risks, and complying with regulatory obligations. With specific reference to the theme of the circular economy, TIM S.A. promotes waste management aimed at reducing its production and promoting separate collection, recovery, and recycling, as well as the recovery of end-of-life products and their correct management and final disposal.

The Policy "Commitment to environmental sustainability in the TIM Group" provides for measures aimed at reducing the use of virgin resources and promoting the reuse and recycling of materials. In particular, the Policy:

- provides for waste management aimed at the reuse and recycling of products, substances and materials, in order to reduce the consumption of primary resources and limit the use of hazardous substances;
- directs the management of company offices towards reducing the use of resources such as paper and water and the management of infrastructures and technological systems towards a more efficient use of energy, gas and fuels.

The "Waste Management Procedure" also provides for measures aimed at reducing the production of waste and promoting the recovery of material, through:

- the reduction of waste production and the increase of reuse and recycling, including by extending the useful life of goods;
- the dissemination of responsible behavior within the Organization, through training and awareness-raising initiatives;
- the selection and management of suppliers that maximize the recovery of waste and prioritize the reuse of rare resources and precious materials.

In the Policy "Commitment to environmental sustainability in the TIM Group", the Company recognizes the importance of ensuring that, in its business and in those of the supply chain, renewable resources are managed in such a way as to preserve the environment and to implement circular economy models. Specifically, TIM:

- when choosing suppliers, give priority to the adoption of recognized certification standards, such as the FSC for paper or the Environmental Product Declaration (EPD) and the carbon footprint for products, to ensure that the supply is managed in a sustainable way;
- promotes the recovery of raw materials, the regeneration of products, for example, for service management, as well as the sale of reconditioned devices.

Disclosure Requirement E5-2 – Actions and resources in relation to resource use and circular economy

[19]; [MDR-A 68 a, b, c, d, e]; [MDR-A, 69 a, b]

In addition to circular economy policies that provide the framework for consistent and informed management of business activities, the Group deploys actions and resources connected to:

- 1. Waste and resource management**
- 2. Resource outflows related to products and services**

The initiatives are aimed at TIM customers and employees, both in Italy and in Brazil, and are implemented on an ongoing basis in order to ensure efficiency in the use of outgoing resources and promote the adoption of circular models along the value chain.

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Waste and resource management

The following actions aim to reduce the consumption of resources such as paper, plastic and encourage the spread of circular models.

■ **WEEE collection and management program (TIM S.A)**

In Brazil, the **"Take Back" program** promotes the collection, **recovery**, recycling, and proper treatment of post-consumer electrical and **electronic equipment (WEEE) waste**, in line with local waste legislation. The initiative makes use of a widespread network of collection points at company stores and authorized retailers and is supported by ABREE (Brazilian Association for the Recycling of Electrical and Electronic Equipment and Household Appliances), which takes care of transport, treatment and recycling activities at authorized plants. Campaigns are also carried out in collaboration with ABREE, schools and municipal administrations, aimed at collecting WEEE and promoting environmental education in local communities, including through incentives to support awareness-raising activities. In 2025, a total of 67 tons of WEEE were recovered from consumers, including 15 tons collected through the TIM logistics network, with a recycling rate of 98%, and 52 tons as part of awareness-raising and social mobilization campaigns carried out in partnership with ABREE. The CapEx earmarked for the initiative amounts to €85.2 k.

■ **Installation of water dispensers and reduction of single-use plastic**

Within the framework of initiatives aimed at the prevention of plastic waste, TIM promotes the progressive installation of drinking water dispensers at its offices, with the aim of reducing the consumption of disposable plastic bottles and promoting sustainable behavior among employees. In 2025, **13 dispensers were installed** at the main offices owned exclusively by TIM. The initiative has allowed us to estimate a **saving of about 6,000¹⁷ 500 ml bottles over the year**.

In Brazil, TIM S.A. has installed 365 water distributors at its offices nationwide. The installations involve administrative buildings characterized by high concentrations of employees, as well as points of sale and call centers. The intervention has contributed to the reduction of plastic waste, with an estimated 24.000 500 ml bottles saved in 2025.

■ **Monitoring and management of water consumption in Data Centers**

Noovle has implemented a structured system for monitoring and managing water consumption across its Data Centers, aimed at reducing water withdrawals and enhancing resource recovery. Performance is monitored through the Water Usage Effectiveness (WUE) indicator, which measures the amount of water used per unit of energy consumed by IT systems: the lower the value, the higher the efficiency in water use.

In 2025, monitoring covered 11 Data Centers, with an average **WUE of 0.097 l/kWh¹⁸**, improving from 0.291 l/kWh in 2024. This result was achieved through precise consumption control, the timely identification of leaks or anomalies, and the optimization of plant management.

In parallel, in line with circular economy principles, **rainwater collection and reuse systems** were installed in 3 Data Centers. In 2025, these systems enabled the recovery of approximately 480 m³ of water (equivalent to around 480 thousand litres), reused for technical and service purposes, contributing to a reduction in reliance on water supplied from the public network.

■ **Dematerialization of processes and monitoring of paper purchases**

The structured program of dematerialization of operational processes continues, aimed at reducing paper consumption through the digitization of company activities. The initiative contributes to the prevention of paper waste production and a more efficient use of resources. Monitoring takes place through the periodic tracking of paper purchases and through a qualitative indicator relating to the progress of the digital migration of processes. In 2025, a total of 1,306.4 tons of paper were purchased, of which 1,296.2 tons for commercial use and 10.2 tons for office use.

■ **Digitization of customer communications**

The process of digitization of customer communications is consolidated, through the monitoring of telephone invoice flows, **payment reminders, and contract termination notices**, with the aim of reducing the use of paper. In 2025, a total of about 92.6 million invoices were issued for Consumer (fixed and mobile), Enterprise and SMB (fixed and mobile) customers, of which about 44 million in digital mode and 48.6 million in paper mode, with a digitization percentage of 47.5%.

With reference to payment reminders and contract termination notices, 3.6 million communications were issued to Consumer customers in 2025, of which 1.5 million in digital format, equal to 41% of digitizable communications. For Business customers, 34,994 payment notices were issued, of which 5,247 in digital mode, equal to 15% of the total. The overall OpEx associated with the digitization of payment reminders amounts to approximately €910 k.

■ **Digitization of contracts in the sales network**

The **digitization project for contracts** signed at the physical sales network involves **enabling customers to digitally sign** through One Time Password (OTP) with a view to reducing the impact on the use of paper and speeding up sales operations, resulting in a paper saving of 10 A4 sheets for each landline contract (NIP/ULL), and 3 A4 sheets for each mobile line contract (AL/MNP). The implementation has been extended to the entire physical sales network, which includes over 4,000 points of sale, both single-brand and multi-brand. The adoption of the digital signature took place gradually and, at the end of the year, reached an overall penetration rate of more than 40%, with some channels and territorial areas exceeding 50%. In 2025, about **860,000 in-person contracts were signed by OTP signature**, of which about 286,000 related to fixed lines and 571,000 to mobile lines, generating an estimated saving of about 4,573,000 sheets of paper. The OpEx related to this initiative amounted to €597 k.

2. Resource outflows related to products and services

The initiatives described below are aimed at recovering materials, extending the useful life of products, and reducing electronic waste, through reuse, regeneration, resale, and leasing models.

¹⁷ TIM has estimated the reduction in plastic consumption resulting from the installation of water dispensers in its premises, assuming the potential consumption of a 500 ml bottle per day for each employee assigned to the premises equipped with dispensers.

¹⁸ TIM calculated the Water Usage Effectiveness (WUE) in accordance with the WP#35 - Water Usage Effectiveness (WUE): A Green Grid Data Center Sustainability Metric standard published by The Green Grid. In this regard, cogeneration systems are also included in the WUE calculation.

■ **Recovery, reuse and donation of company equipment**

The commitment to the recovery and regeneration of IT equipment and company smartphones continues, with the aim of promoting their internal reuse and reducing the production of electronic waste. In 2025, over 14,000 IT equipment units were collected, of which 48% were sent for disposal and the remaining part was recovered. Of the approximately 7,500 items recovered, more than 50% were reused internally or redeemed by employees, while the remaining portion was made available for further reuse.

In parallel, the donation of devices that are functional but not reusable internally to qualified non-profit organizations is promoted. In 2025, around 1,500 devices, including monitors and laptops, were donated, with over 200 units additionally available for future donations. The total OpEx for recovery and donation activities amounts to €78.6 k

■ **Extension of the useful life of the devices**

Trade-in initiatives, an integral part of the offer, aim to extend the useful life of the devices and promote the recovery of raw materials, contributing to the reduction of electronic waste. In Italy, through the "TIM Rivaluta Smartphone" service aimed at Consumer customers, customers can return their used device and obtain a discount on the purchase of a new smartphone. The collected devices are regenerated or sent to correct treatment. In 2025, **21,787 smartphones were collected**, an increase of almost 300% compared to 2024; about 80% of the recalled devices have been regenerated, making it possible to avoid the production of about 45 tons of electronic waste.

In Brazil, through the "TIM Troca Smart" initiative, TIM S.A. promotes the collection and reuse of used mobile devices, offering customers discounts or incentives for the purchase of new models. In 2025, a total of 15,933 devices were collected, of which 99% were reused.

■ **Replacement of faulty products with regenerated devices**

In the after-sales replacement processes, the use of regenerated devices is prioritized, contributing to the extension of the useful life of the products and the reduction of electronic waste. As part of the "All Risk Assistance" service aimed at Business customers, in 2025 about 12,000 regenerated smartphones were provided to replace failed, lost, or stolen devices, equal to 75% of the total replacements made.

For Consumer customers, over **13,000 modem replacements were made with regenerated devices**, equal to 19% of total replacements. In addition, as part of the **collaboration with the Turin Prison for the regeneration of modems**, in 2025 about 38,000 devices were regenerated, of which 13,500 were intended for new use.

The activities have OpEx of €2,619k

■ **Sale of reconditioned smartphones**

The offer aimed at Consumer customers is enriched by Grade A refurbished Apple smartphones, with the aim of offering quality devices at affordable prices and, at the same time, promoting more sustainable consumption models. The devices are purchased from suppliers specialized in carrying out a structured reconditioning process, including technical verification, replacement of worn or damaged components, and functional tests, in order to guarantee high quality standards. In 2025, approximately 550 refurbished smartphones were sold. The OpEx related to the initiative amounts to €88.7 k.

■ **Production of physical SIMs with reduced environmental impact:**

SIMs for TIM and KENA customers are made using 100% recycled and recyclable plastic, helping to reduce the use of virgin raw materials. The packaging includes the use of FSC-certified paper flyers and 100% recyclable plastic bags, with the aim of minimizing the environmental impact associated with the production and distribution of physical SIMs. The initiative contributes overall to the reduction of waste and to the improvement of efficiency in resource use throughout the life cycle of the product.

■ **Activation of e-SIM**

The adoption of e-SIM as an alternative to physical sims is promoted, with the aim of reducing the use of materials and the production of electronic waste. A comparative analysis of the carbon footprint shows a 98% reduction of unit emissions compared to traditional SIMs. At the end of 2025, about **175,000 lines with e-sim** are active in the Consumer segment, up from 77,000 recorded at the end of 2024. Overall, approximately **270,000 new e-SIMs were activated** during 2025, with avoided emissions estimated at 34 t CO₂eq¹⁹. The implementation activity resulted in OpEx amounting to €123 k.

■ **Rental of mobile devices**

The initiative provides for the rental supply of mobile devices for Small Business customers under mobile contracts, adopting an operating lease model as an alternative to the sale of the asset. The devices are provided together with the SIM for access to telephony and data services. At the end of the contract, or of the related renewals, the devices are returned for technical evaluation and possible regeneration or reuse, contributing to the extension of the useful life of the products and the reduction of electronic waste. In 2025, **7,434 rental devices were registered**. The initiative is part of the EU 5.5 taxonomic activity, as it promotes a product-service model aimed at promoting the operational life of the devices and efficiency in resource use. CapEx related to the initiative amount to €3,949 k.

■ **Sales of remanufactured multifunction printers**

The commercialization of regenerated multifunction printers is intended for the Olivetti authorized dealer network, with the aim of promoting the reuse of electronic equipment and reducing the production of technological waste. The devices are subjected to a structured regeneration process that includes checking the general condition, cleaning, repair, and replacement of worn or non-functioning components. At the end of the process, each printer is tested to ensure its correct operation and compliance with the required quality standards. In 2025, **366 regenerated printers were sold**. The activity is part of the EU 5.4 taxonomic activity, as it promotes the marketing of reconditioned and fully functional goods, contributing to the spread of more responsible consumption patterns and the reduction of environmental impact throughout the product life cycle.

¹⁹TIM, in line with what was done in 2024, assessed the difference in terms of climate footprint (greenhouse gas emissions) between the physical SIM and the eSIM (embedded sim), applying what emerged from the study carried out by RETECLIMA which highlighted: for the physical SIM, the obtained footprint is 0.131 KgCO₂eq for each SIM; for the eSIM, the footprint obtained is 0.00245 KgCO₂eq for each eSIM.

■ **Supply of regenerated toner cartridges for the Public Administration**

As part of the tenders addressed to the Public Administration (Consip), the supply of reconditioned toner cartridges for multifunction printers is envisaged, ensuring that at least 30% of the supplies consist of products recovered and returned to the production cycle. The regeneration process is based on the recovery of spent original cartridges which, after a careful cleaning and control process, are refilled with toner powder and, where necessary, subjected to the replacement of internal components subject to wear. **933 regenerated toner cartridges** were supplied in 2025. The activity falls within EU activity 5.4 of the Taxonomy, as it favors the reuse of materials and the reduction of waste production in the cycle of consumables for printing.

■ **Reuse of customer premise equipment - Customer Premise Equipment (TIM S.A.)**

In Brazil, structured programs are active for the recovery, regeneration and reuse of equipment provided to customers (Customer Premise Equipment - CPE), such as modems, routers and decoders, returned following the termination or suspension of telecommunications services or connectivity services. The returned devices are subjected to technical inspection, cleaning, functional tests, and firmware update to verify their suitability for reuse. Suitable equipment is regenerated and re-entered into the operating cycle, contributing to the reduction of the demand for new devices and the reduction of electronic waste (WEEE). The non-recoverable units are instead sent to authorized plants for the treatment and recycling of materials, in compliance with current environmental legislation. In 2025, **128 tons of modems were collected, of which 79% were regenerated and reused**, re-entering the supply circuit to customers. The activity falls under EU Activity 5.3 of the Taxonomy, as it promotes the reuse of products and their components, extending their useful life and reducing waste production, in line with the principles of the circular economy. The OpEx destined for this activity amounts to €2.680 k.

■ **Disposal and resale of network equipment - decommissioning**

The disposal and resale of no longer used technological equipment is part of the broader process of transforming and modernizing network infrastructure. The activity involves the removal of end-of-life equipment, such as routers, switches and servers, intended for the management of network links, the exchange of data between nodes and central processing and storage systems. Disused equipment undergoes an evaluation and selection process aimed at verifying its suitability for reintroduction to the market. The still functional devices are intended for sale through dedicated auctions, favoring their reuse and contributing to the reduction of electronic waste. This approach makes it possible to extend the useful life of the equipment, avoid the early decommissioning of devices that are still operational, free up space at technical sites, and optimize the management of infrastructure shared with other operators. The activity is part of the EU 5.4 taxonomic activity, as it promotes the sale and reuse of second-hand goods, contributing to the circularity of resources and the sustainable management of the end of life of technological equipment. In 2025, two sales auctions were held, with revenues of €69.7 k and total OpEx of €77.4 k.

■ **Development of environmental culture and promotion of the circular economy (TIM S.A.)**

Environmental culture is promoted through awareness-raising initiatives dedicated to the efficient use of resources and the principles of the circular economy, in support of waste management and material recovery actions. In 2025, two training meetings on the circular economy were held, one of which was open to the public and broadcast online. Periodic communications on environmental issues were also disseminated through internal channels and external platforms, with the aim of encouraging responsible behavior. The OpEx destined for this activity amounts to €10.2 k.

Overall, the actions described contribute to mitigating the negative impact IRO 37, connected to inadequate waste management, and to enhancing the opportunity IRO 28, linked to the recovery of materials and the extension of the life of products.

The total expenses identifiable for the actions described in disclosure requirement E5-2 "Actions and resources related to the use of resources and the circular economy" amount, gross of taxonomic activities, to €9,898 thousand (OpEx) and €3,949 thousand (CapEx) for the Domestic BU and to €2,690 thousand (OpEx) and €85 thousand (CapEx) for TIM S.A.; net of the portion attributable to taxonomic activities, these amounts are equal to €7,201 thousand (OpEx) for the Domestic BU and €10.2 thousand (OpEx) and €85 thousand (CapEx).

Metrics and targets

Disclosure Requirement E5-3 - Targets related to resource use and circular economy

[23]; [MDR-T 81 a, 81 b i, ii]

TIM monitors the effectiveness of policies and actions relating to impacts and risks in terms of resource use and the circular economy through a structured system of performance indicators (KPIs), recorded periodically, which allows for the continuous evaluation of environmental performance trends and the effectiveness of the measures adopted.

In particular, the monitoring concerns:

- aspects related to the recovery of materials and initiatives to extend the useful life of products, for which indicators such as: the number of devices recovered and regenerated through trade-in and preparation for reuse programs; the percentage of modems marketed with carbon footprint certification; the content of recycled materials in TIM-branded products; the quantity of precious materials recovered from WEEE;
- waste management, for which the total amount of waste produced is monitored; the total amount (by weight) of waste not destined for disposal through preparation operations for reuse and recycling; the quantity (in weight) of waste directed for disposal, broken down by type of treatment.

In Brazil, TIM S.A. monitors a further indicator relating to the reuse and recycling rate of solid waste, expressed as a percentage of the total solid waste generated by operational activities. For this indicator, a reference level of 96% has been defined by 2026, consistent with the waste management approach adopted by the company, aimed at favoring the recovery of material over final disposal.

The monitoring of environmental issues is also supported by the adoption of a management system certified according to the international standard ISO 14001, which provides for structured planning, control and continuous improvement processes aimed at preventing waste, increasing recycling and effectively managing disposal.

Disclosure Requirement E5-5 - Resource outflows

Environmental characteristics of the products

[35]; [36 a, b, c]; [MDR-M, 77 a]; [40]

In the Domestic sector, the TIM Group integrates environmental sustainability criteria and circular economy principles in the design and marketing of TIM-branded modems, which represent about 90% of the total products sold under the TIM brand.

The design of modems is aimed at extending the useful life and reducing environmental impacts throughout the entire life cycle. The devices are developed to ensure durability and reliability over time, with an estimated average life of about 10 years, depending on the technology used, failure rates and the availability of spare parts. During the tender phase, a Mean Time Between Failure (MTBF) of more than 300,000 hours is also required as a minimum reliability requirement, in order to limit premature replacements

The design also favors solutions that facilitate repairability and disassembly, allowing the replacement of standardized components and the reconditioning of devices returned by customers, which are verified, refurbished, and reintroduced into the technical assistance cycle. Particular attention is paid to material selection, through the use of recycled or recyclable components and the introduction of specific requirements regarding the recyclability of plastics in the tender procedures. The use phase is also optimized through energy-efficient solutions, while the packaging is made of 100% recycled and recyclable cardboard.

This design approach forms the basis for the adoption of instruments for measuring and certification of environmental impacts, including the EPD (Environmental Product Declaration). In this context, in 2024 the first modem with EPD (Environmental Product Declaration) certification was introduced, the TIM Hub Pro, to which the certification of the TIM Hub+ XDSL model was added in 2025, both validated by an independent third party. EPD certification, based on a Life Cycle Assessment, makes it possible to objectively quantify environmental impacts throughout all phases of the life cycle, including the carbon footprint. This tool directs customers towards conscious purchasing choices and promotes a design approach based on the comparability of environmental performance. In 2025, TIM shipped over 1 million modems, of which 70% were equipped with EPD.

TIM guarantees assistance and repair of modems, also through the use of refurbished products. The regeneration of failed devices is carried out through the recovery of modems returned by customers, technical verification of their condition, assessment of the feasibility of regeneration, replacement of functional blocks or standardized components, and subsequent re-entry into the technical assistance cycle for the replacement of other failed devices. Consistent with this approach.

For these two products, the average rate of recyclable content ²⁰ is 60.4%, while the rate of recyclable content in the relative packaging is 39.6%, as shown in the table below.

Recyclable content of products - TIM Group

	UOM	2025	2024
Recyclable content rate in products	%	60.40	93.17
Total weight of recyclable content in product packaging	%	39.63	29.94

The variation in the rate of recyclable content in the products reflects the different mix of equipment marketed. In particular, in 2025 the introduction of the TIM HUB+ XDSL, which includes a filter for access in ADSL technology, affected the average value of the indicator, since this component has a lower level of recyclability than the other type of modem (TIM HUB Pro). The increase in the rate of recyclable content of packaging is instead associated with the progressive spread of packaging solutions characterized by a lower use of plastic and a greater use of recyclable materials.

Waste production and treatment

[MDR-M, 77 a]; [37 a, b, c, d]; [38 a, b]; [39]; [40]

The TIM Group monitors the production of waste and its management methods in order to improve prevention, recovery and reuse activities. Data is collected and analyzed periodically through dedicated management systems that allow for flow traceability and direct control of quantities.

In the Domestic sector, waste is classified according to the European Waste Catalogue (EWC) and the data collected complies with Directive 2008/98/EC of the European Parliament and of the Council, also known as the "Waste Framework Directive", amended by Directive (EU) 2025/1892.

In Brazil, TIM S.A. adopts an environmental management system that allows the traceability of incoming and outgoing flows of resources, ensuring the monitoring of waste production and recovery activities. The classification of hazardous waste and non-hazardous waste is carried out in accordance with ISO 14001, in order to ensure consistency, validation and comparability of data.

As part of its operations, the TIM Group generates non-hazardous waste, including mixed packaging, waste from electrical and electronic equipment (WEEE), cables and metals, as well as hazardous waste such as batteries and accumulators. The prevalent materials in the main types of waste include paper, wood, plastic and metal waste (mainly iron, steel and copper).

²⁰ The percentages of recyclable content are calculated using the weight of the TIM HUB+ modem (860 g) and the average weight of the packaging (360 g) as a reference. The calculation takes into account the different compositions of materials used in the product and its packaging.

The following table shows the details of the waste generated, separated by destination and type.

Waste generated - TIM Group

	UOM	2025			2024		
		Hazardous waste	Non-hazardous waste	Total	Hazardous waste	Non-hazardous waste	Total
Waste generated	t	713.63	3,341.17	4,054.80	956.64	4,438.58	5,395.22
Waste diverted from disposal	t	706.09	3,213.94	3,920.03	946.33	4,294.17	5,240.50
preparation for reuse	t	2.16	103.86	106.02	—	87.24	87.24
recycling	t	364.27	1,414.53	1,778.80	522.95	1,734.84	2,257.79
other recovery operations	t	2.70	6.76	9.46	—	—	—
Waste directed for disposal	t	7.54	127.23	134.77	10.31	144.41	154.72
incineration	t	2.42	23.76	26.18	5.16	11.16	16.32
disposal in landfill	t	5.12	103.48	108.60	5.16	133.26	138.42
other disposal operations	t	—	—	—	—	—	—
of which non-recycled waste	t	7.54	127.23	134.77	10.31	144.41	154.72
% of non-recycled waste	t	1.06	3.81	3.32	1.08	3.25	2.87

The data collection and consolidation process is progressively strengthened, with the aim of increasing the level of information detail at Group level.

Regarding waste diverted from disposal, it is specified that the data on the relative destinations (preparation for reuse and recycling) currently refer exclusively to TIM S.A. For waste destined for disposal, a methodological assumption has been adopted that provides for a 50% distribution of waste sent to landfill and 50% destined for incineration, in line with the ISPRA "2023 Urban Waste Reports" study. This criterion was applied to the entire reporting perimeter, in Italy and Brazil

In 2025, the **TIM Group generated 4,054.8 tons of waste, a 24.8% decrease** compared to 2024. The change primarily reflects a different information base for the 2024 data, which includes an estimated component related to the network separation process and the consequent unavailability of fully accurate tracking for the entire financial year. The 2025 figure, on the other hand, is entirely recorded on a final basis and is therefore more homogeneous than the current operating perimeter. In addition, during the year decommissioning initiatives were launched that prioritized the valorization and reuse of decommissioned assets, avoiding the production of waste (for details, see the disclosure obligation E5-3 "Objectives relating to resource use and the circular economy").

The **share of waste started for recovery remains high at about 97%** in 2025. As shown in the table below, the Group does not produce radioactive waste.

Hazardous and radioactive waste - TIM Group

	UOM	2025	2024
Total amount of hazardous waste	t	713.63	956.64
of which Radioactive	t	0.00	0.00

3. SOCIAL INFORMATION

Own workforce [ESRS S1]

Strategy

Disclosure Requirement SBM-2 – Interests and views of stakeholders

[S1 SBM-2, 12]

In defining its strategy and business model, the TIM Group considers the interests, opinions and rights of its workforce, recognized as key stakeholders for the creation of sustainable value in the medium to long term.

The needs and expectations of workers are collected through structured modes of involvement, both direct, such as interviews, internal surveys, climate questionnaires and dedicated meetings, and indirect, through workers' representatives systems and continuous dialogue with trade unions.

Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Perimeter of own workforce

[S1 SBM-3 14 a]

The TIM Group has identified the types of workers potentially subject to significant impacts deriving from its operations, including all categories of workers involved in its activities, regardless of the contractual form. This perimeter includes:

- **employees**, with whom the Group has a direct contractual relationship, for a fixed-term or open-ended period, full time or part-time;
- **non-employee** workers who operate on behalf of the Group, with whom TIM has indirect or atypical contractual relationships but who are functionally integrated into the company's activities. The following stand **out**:
 - **workers contracted** through temporary employment and/or administration agencies, including workers with a contract of administration mainly in staff leasing mode (in particular in the context of TIM Retail);
 - **self-employed workers**, understood as independent professionals who provide services or skills to the Group without an employment contract, in the context of ongoing collaboration relationships or in any case relevant to company operations, such as, for example, consultancy or health care activities for the Assilt entity.

Impacts, risks and opportunities related to the workforce

[S1 SBM-3 14 b, c, d, e, f, i, ii; g i, ii]; [S1 SBM-3, 15]; [S1 SBM-3, 16]

Following the double materiality analysis, the Group identified material impacts, risks, and opportunities related to its workforce, distinguishing between effects of an incidental nature and factors of a structural nature.

The negative impacts deriving from specific events are mainly related to cybersecurity (IRO 1) and occupational health and safety (IRO 15); those of structural nature are linked to the way work is organized and, in particular, incentive and benefit systems not fully aligned with sustainability objectives can affect employee motivation (IRO 17), while work contexts that do not adequately guarantee the right to disconnection and work-life balance can negatively affect individual well-being and stress levels (IRO 36).

A positive impact has also been identified associated with training and skills development initiatives, including reskilling activities (IRO 5), which contribute to professional growth and strengthen the Group's workforce's ability to adapt to organizational and technological changes.

With reference to risks, aspects related to the violation of privacy and unauthorized access to employees' personal data (IRO 26), gender inequalities in terms of remuneration, access to roles of responsibility, and transparency in career paths (IRO 35), and the failure to respect human rights within the organization and along the supply chain (IRO 38), were identified. These issues can have legal, economic and reputational consequences, also affecting the ability to attract and retain talent. However, no operations involving a serious risk of forced labor, compulsory labor, or child labor were detected.

The identified opportunities concern the enhancement of diversity and the creation of an inclusive work environment (IRO 20), the adoption of flexible and hybrid working models (IRO 22), the definition of clear and achievable performance objectives for employees (IRO 24), as well as investments in training and skills development, including through research collaborations (IRO 30). These themes can contribute to improved productivity, organizational well-being, and the ability to attract and retain a skilled and diverse workforce, while generating economic and reputational benefits.

The Group's climate transition plan, currently being defined, is primarily oriented toward the reduction of emissions and the technological transformation of infrastructure and does not have significant impacts on its own workers in terms of working conditions, employment, or rights. Therefore, no significant effects on the business model or company resilience have been identified with respect to workforce size.

Some risks and opportunities may relate to specific groups of the workforce. In particular, the risks associated with gender inequalities, in line with structural dynamics observed in the labor market, mainly affect the female population, with respect to which the TIM Group is committed to reducing the wage gap and promoting equal opportunities.

Opportunities related to the enhancement of diversity and inclusion can instead concern, in addition to the female population, other groups of the workforce, such as ethnic and cultural minorities, as well as different generational groups, contributing to creating an inclusive work environment and strengthening the Group's attractiveness as an employer.

Some risks may affect specific groups of the workforce in different ways. In particular, the female population and minorities may be more exposed to inequalities in terms of access to opportunities, professional development, and working conditions. The Group devotes particular attention to these groups, monitoring the evolution of risks and promoting initiatives aimed at ensuring equal opportunities and inclusion.

To identify the risks that fall on its employees, the Group regularly collects the opinions of workers through listening activities and internal surveys on the level of satisfaction to understand their needs and guide their actions.

The detail of the IROs is reported in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

Impact, risk, and opportunity management

Disclosure requirement S1-1 - Policies related to own workforce

[19]; [MDR-P, 65 a, b, c, d, e, f]; [20 a, b]; [21]; [22]; [23]; [24 a, b, c, d]

The double materiality analysis identified **twelve material IROs** (IROs 1, 5, 15, 17, 20, 22, 24, 26, 30, 35, 36 and 38) related to the topic "Own workforce". These IROs are **monitored** through the "**Code of Ethics and Conduct**", the "**Human Rights Policy**", the "**Human Resources and Equal Opportunities Policy**", the "**Management of episodes Gender Based, Sexual, Harassment and Bullying Policy**", the "**Whistleblowing Procedure**", the "**Report on the Remuneration Policy**", the "**Health and Safety Policy**", "**Framework for the Application of Personal Data Protection Legislation**" and the "**Information Security Policy**".

The detail of the IROs is reported in the dedicated table within ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section, while for further information on the general aspects relating to policies, please refer to the chapter "Policies - MDR-P" in the same section. For the Group's commitments to human rights, including the prevention of human trafficking, forced and child labor, and compliance with international labor standards, please refer to the "Human Rights Policy" in chapter "Policies - MDR-P" of the same section.

To define the Group's framework in the Brazilian context, TIM S.A. has adopted specific policies aimed at guiding and managing the impacts on its workforce.

Through the "Code of Ethics and Conduct", the Human Rights Policy and the Social Responsibility Policy, TIM S.A. has defined a framework for the protection of human rights for the performance of its activities. The policies, aligned with leading international human rights and labor standards, apply to the Group's workforce and, where relevant, the value chain. TIM SA's commitment translates into the prevention of practices such as child labor, forced labor, and human trafficking, as well as the promotion of responsible behavior consistent with the Group's ethical principles.

TIM S.A. has defined a "Diversity and Inclusion" policy, aimed at promoting equal opportunities and an inclusive work environment along the people management processes; a "Policy on Occupational Health and Safety", which establishes common principles for the protection of the health and safety of workers and for the continuous improvement of working conditions; a "Business Development and Learning Policy", aimed at guiding professional growth and skills enhancement initiatives.

In terms of **occupational health and safety**, TIM adopts policies aimed at ensuring a safe and healthy working environment and preventing occupational accidents and diseases, promoting an approach oriented towards prevention and continuous improvement.

In the Italian context, these policies are supported by an occupational health and safety management system that uses specific procedures, including the procedure relating to the "management of worker accidents", aimed at ensuring a structured monitoring of professional events in line with the applicable legislation.

In the Brazilian context, TIM S.A. similarly adopts an occupational health and safety management system, within which the internal procedure "Management of professional events" represents one of the tools to support the implementation of health and safety policies, contributing to the prevention of accidents and the continuous improvement of working conditions.

TIM addresses the issue of **discrimination** through a comprehensive system of policies and procedures aimed at preventing, identifying, and combating discriminatory behavior, harassment, and bullying within the organization. The Group's policies prohibit any form of discrimination based, inter alia, on personal, social, or cultural characteristics and promote respect for equal opportunities and inclusion.

The Group has also adopted specific tools for the management and treatment of discriminatory incidents, including a whistleblowing procedure that allows workers to report unlawful conduct or conduct that does not comply with ethical principles, ensuring confidentiality and protection from retaliation. The commitments, principles and objectives of the policies on non-discrimination, equal opportunities and harassment prevention are described in the "Policies - MDR-P" chapter in the "General Information" section.

Even in the Brazilian context, TIM S.A. oversees the issue of non-discrimination through a set of policies and procedures that prohibit all forms of discriminatory behavior and promote respect for equal opportunities. These policies explicitly contemplate the main grounds of discrimination recognized at the regulatory and international level. The implementation of the principles of non-discrimination is supported by dedicated procedures and tools, aimed at preventing, identifying and managing non-compliant behavior within the organization.

As part of its policies, TIM S.A. pays attention to groups of workers who may be more exposed to situations of vulnerability, taking into account, among other factors, gender, disability, age, health conditions, and belonging to racial, ethnic, or religious minorities.

TIM S.A. promotes the inclusion of people belonging to potentially vulnerable groups through company policies aimed at enhancing differences and creating an inclusive work environment, in line with the principles of diversity and equal opportunities adopted by the Group.

Disclosure Requirement S1-2 - Processes for engaging with own workforce and workers' representatives about impacts

[27 a, b, c, d, e]; [28]

The TIM Group adopts structured processes for the involvement of workers, directly or through their representatives, in order to gather perspectives on the current and potential impacts of the Group's activities on the workforce and to consider them in the internal processes for assessing and managing these impacts.

Direct involvement of workers

The direct involvement of workers takes place through structured tools for listening to the company population and specific company processes, which allow the TIM Group to gather the perspectives of the workforce on the impacts of its activities and to evaluate over time the effectiveness of the methods of involvement adopted.

In 2025, TIM in the Domestic area used the following direct engagement tools:

- **Double materiality analysis:** in order to identify the material impacts of its activities on the environment, people, and governance, a sample of 531 employees was involved. The participation rate was 44.2% of the sample involved. The results help guide reporting priorities and involve workers in decision-making processes.
- **InAscolto Survey:** Addressed annually to the entire company population, the survey makes it possible to detect the needs and requirements of the workforce, also with reference to areas that can generate impacts, including corporate welfare. In 2025, the level of welfare satisfaction was 3.4 on a scale of 1 to 5. The results of the survey, shared with top management, are used to assess the effectiveness of engagement initiatives and to guide the improvement of welfare and inclusion policies.
- **Climate Survey:** detects the level of satisfaction and engagement of the company population, allowing identification of strengths and areas for improvement in the management of relationships with the workforce. The results represent one of the main tools with which the Group monitors the effectiveness of worker involvement over time. In 2025, the level of engagement was 56%. The data, collected in pseudo-anonymized form, analyzed by independent parties, and shared in summary with the Board of Directors, top management, and organizational managers.

In Brazil, TIM S.A., in addition to rapid and periodic surveys on climate and engagement (Pulse surveys), conducts an annual survey on climate and engagement aimed at assessing the level of engagement and cultural alignment of the corporate population with respect to various dimensions, including culture of integrity, organizational agility, responsible leadership, work environment, organizational processes, reward systems, professional development, and people well-being. The results of the Climate and Engagement Survey help identify opportunities for improvement and define corporate action plans and specific initiatives, which are monitored by the People, Culture & Organization function to support the continuous improvement of personnel management processes.

Moreover, to consider the perspectives of the workforce in a structured way in the management of impacts, TIM S.A. reviews its material sustainability issues at least biennially, involving employees among the stakeholders.

Indirect involvement of workers through workers' representatives

The TIM Group also engages workers through trade union representatives as part of its industrial relations model, which values information, consultation, and negotiation in compliance with legislation, collective bargaining agreements, and UN human rights guidelines. The model provides for the involvement of representatives at national and territorial level; in particular, the Unitary Trade Union Representatives (RSUs) favor decentralized comparison within the scope of the protections provided for by the applicable legislation and collective bargaining. In the Domestic perimeter, in 2025, TIM redefined the Industrial Relations Protocol and renewed workers' representations through elections that registered wide participation. During the year, more than 25 meetings were held with the trade union representatives of the parent company, during which issues such as supplementary corporate bargaining (for example, the Result Premium), organizational developments, training, and the safeguarding of employment levels were addressed, also through instruments such as the Solidarity Contract.

Involvement is also achieved through joint commissions provided for by the industrial relations model, dedicated to the in-depth study of specific subjects, including training, health and safety in the workplace, welfare, and equal opportunities. During the meetings, general requests expressed by workers can also be discussed, such as work-life balance, training, and the organization of working hours, which, where sustainable and compatible with company choices, can be formalized through trade union agreements.

Responsibility for the management of industrial relations and the involvement of workers' representatives is entrusted to the Industrial Relations function, within the Human Resources & Organization Department.

Workers can consult, through the company intranet, information relating to the main trade union agreements; The resources dedicated to the involvement of the representatives are defined annually in the budget, depending on the projects and agreements that the company intends to implement.

In Brazil, TIM S.A. involves workers' representatives at the national and territorial level, in particular with reference to collective agreements and related negotiations, profit-sharing programs, and any internal reorganizations that could have significant impacts on employment. Collective bargaining applies to all employees.

The collective contract 2025–2026 of TIM S.A. has been approved in all States and in the Federal District following the meetings of the trade union federations. The agreement provided for the updating of economic conditions, with salary and social security adjustments, as well as the recognition of a compensatory bonus. The contract also includes clauses relating to ethical principles in the use of artificial intelligence, commitments to professional development related to the use of such tools, provisions on environmental sustainability in employment relationships, the reduction of 6x1 hours in part of call center operations, the revision of hours for store staff, and the implementation of a mental health and psychological well-being program.

Responsibility for the management of relations and negotiations with trade unions, as well as the monitoring of related relations, is entrusted to the Trade Union & Labour Relations function, within the People, Culture & Organization Department. In defining the trade union agreements and regulations governing the employment relationship, the TIM Group takes into account fundamental human rights, ensuring that these instruments do not affect the freedom, dignity, equality, and justice of workers. The dialogue with trade union representatives and the industrial relations model adopted at Group level are therefore also a tool through which TIM collects and considers the demands and perspectives of the workforce in relation to social issues and human rights.

Disclosure Requirement S1- 3 - Processes to remediate negative impacts and channels for own workers to raise concerns

[32 a, b, c, d, e]; [33]

TIM monitors and manages the main negative impacts on its workforce through a complex system of policies, processes, and actions, supported by reporting channels that allow workers to communicate any concerns, violations, or needs related to company operations in a secure and confidential manner, ensuring they are addressed and properly managed. Channels are one of the tools the company uses to manage potentially significant workforce situations, including for evaluating potential remedial actions. They are cross-functional, making them suitable for capturing a wide range of business situations.

Through these channels, situations attributable to the material IROs can also be reported, including: issues related to cybersecurity and personal data protection, with possible impacts on privacy (IRO 1); aspects relating to health and safety at work, including any shortcomings in training or in prevention measures (IRO 15); organizational elements that affect the well-being and involvement of the workforce, such as incentive and benefit systems not adequately aligned (IRO 17), as well as respect for the right to disconnect and the balance between private life and work (IRO 36).

TIM provides internal reporting channels through which it is possible to transmit to the Supervisory Body information on possible violations of laws and regulations, the code of ethics and conduct, the 231 organizational model, and current procedures, referring to TIM personnel and/or third parties.

The Group monitors the level of awareness and trust in the reporting channels through employee feedback, collected through surveys, training activities and analysis of how the channels are used. The prevailing use of the whistleblowing channel compared to other available methods is an indicator of the level of knowledge and trust in the reporting system. Channel information is made available in key company documents, mandatory training programs, and internal communication tools.

Reporting channel for ethical, regulatory and anti-corruption violations

The Whistleblowing Channel is the tool through which the Group receives and manages reports relating to **ethical and regulatory violations and corruption**. In particular, the reports concern conduct carried out by employees of the TIM Group or by third parties, **including incidents of discrimination, harassment, and human rights violations**, which may have significant effects on the workforce.

Through the Channel, violations of laws and regulations, of the Group's code of ethics and conduct, of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 and of the current system of rules and procedures, as well as possible cases of corruption or bribery, can also be reported. The Channel manages reports relating to TIM S.p.A. and the TIM Group companies, with the exception of listed companies and foreign companies.

Reports can be made through a dedicated portal, accessible to internal and external stakeholders, which guarantees the confidentiality of the identity of the whistleblower and the people involved through the use of security protocols and encryption tools. The portal issues a Unique Identification Code that allows the whistleblower to monitor the status of the report and to exchange further communications with the competent parties, even anonymously. In compliance with applicable legislation and the protection of privacy, no form of retaliation, direct or indirect, personal or professional, against the whistleblower due to the report made is allowed or tolerated. The protections provided also apply to anonymous whistleblowers, including where the identity of the whistleblower has subsequently emerged.

The reports are received and managed by the Supervisory Bodies of TIM or of the group companies concerned, with the support of the Audits Department which, independently and objectively, carries out the investigative activities, identifies any corrective actions and communicates the results to the competent Supervisory Bodies. The Whistleblowing Procedure regulates the management of reports, including those relating to possible episodes of corruption, ensuring prompt, independent, and impartial investigations with certain response times to the whistleblower. The whistleblowing system is integrated into the Group's Internal Control and Risk Management System (SCIGR).

In addition to the dedicated portal, the whistleblowing channel also includes:

- a voice mail accessible via the toll-free number 800 664 411;
- the possibility of sending reports by ordinary mail to the Supervisory Body of TIM or the Group companies concerned, at their registered offices.

Reports received through the Whistleblowing Portal are received by the Supervisory Bodies of TIM or of the competent subsidiaries and managed with the support of the Audits Function.

The audits Department, independently and objectively, carries out the preliminary checks aimed at assessing the reliability of the information reported, identifying any control deficiencies, anomalies or irregularities and proposing the appropriate corrective

actions. The results of the activities are documented in specific reports and communicated to the competent Supervisory Bodies, which support the decisions to close the case and the possible adoption of disciplinary measures.

The implementation of corrective actions is entrusted to the management of the areas concerned, with monitoring by the Audits Department and periodic disclosure to the Supervisory Bodies.

The company communicates and promotes the use of the whistleblowing Channel both internally and externally, ensuring adequate visibility. Information on how to manage and process reports is made available through the company intranet and the website of the parent company and its subsidiaries.

Also in Brazil, TIM S.A. provides a Whistleblower Channel accessible to internal and external stakeholders, available 24 hours a day, 7 days a week, through an independent multi-channel platform (web, intranet, telephone and app), in bilingual format and equipped with accessibility tools. The Channel allows nominative or anonymous reports relating to incidents of discrimination, harassment, corruption, fraud, conflicts of interest, regulatory violations or violations of the code of ethics and conduct. The management is entrusted to the Internal Audits function, which reports to the Board of Directors, ensuring confidentiality, protection of the identity of the whistleblower, and absence of retaliation; the most important reports are submitted to the competent bodies and committees for the purposes of supervision.

The whistleblowing channel is supported by an ongoing awareness and training program, while the results of business climate surveys guide any improvement actions.

TIM S.A. provides additional dedicated tools for reporting discrimination, harassment or other forms of intolerance in the workplace (such as, by way of example, LGBTI+phobia, racism, misogyny, ageism, religious intolerance, moral or sexual harassment), guaranteeing in all cases the confidentiality of the reports.

Health and Safety reporting channels

These channels make it possible to report situations and events related to working conditions that may pose risks to the health and safety of workers, in particular in relation to deficiencies in prevention measures, training, or the organization of work activities (IRO 15).

In particular, the following channels are active:

- internal reporting channel dedicated to facility managers, within the Employer's delegation system on occupational health and safety and environmental protection, for reporting possible risk situations;
- internal reporting channel for workers through the company intranet (HSE Portal), which allows you to:
- send formal reports relating to hazards, anomalies or risk situations;
- consult the list of Workers' Safety Representatives (WSRs) and contact them for unresolved reports through the previous channels or for the mediated forwarding of reports;
- direct reports from workers to the supervisor and/or manager, to communicate anomalies or risk situations detected during the performance of work activities.

The reports are taken over and managed by the company departments responsible for Health and Safety, according to the applicable internal procedures.

In Brazil, TIM S.A. provides its employees with various reporting channels to represent situations, events, or needs related to working conditions. An anonymous reporting channel for workplace accidents is available on the company intranet. All reported incidents are analyzed by occupational health and safety (OHS) professionals, adequately trained to identify the causes of the events and define action plans aimed at preventing the recurrence of events of the same nature.

Employees can also directly contact the Health, Safety and Environment functions and the People, Culture and Organization team through the "Meu RH" channel, to report any specific concerns or needs.

In addition, TIM S.A. has implemented a periodic monitoring system for employee health and safety risks, which includes direct observations, document analysis, inspections, and internal and external audits. The company conducts periodic simulations of emergency cases and has an emergency response plan (ERP) for handling critical scenarios. TIM S.A. provides a social worker and/or psychologist for psychological support to employees in situations of vulnerability. The service is part of the Continuous Support Program – Personal Support, aimed at promoting the well-being of employees and their families.

Reporting channels in the field of cybersecurity and physical security

These channels allow you to report events and situations related to information security and are a tool to intercept reports related to material risks in the field of cybersecurity and personal data protection (IRO 1).

In particular, for workers, the following channels and safeguards are active:

- email boxes available in a specific section of the Intranet dedicated to reporting security vulnerabilities on TIM-branded systems, applications, or products, spam and phishing, as well as cyber incidents involving people, company assets, and information and digital assets;
- Abuse Desk channel, accessible from the Group's website, through which employees can report improper or illegal use of the Group's network and assets;
- As part of integrated security systems, dedicated reporting channels (email boxes and toll-free numbers) are also active, which allow events relevant to the physical security of company premises and environments to be reported, contributing to the prevention and management of situations that may involve theft, loss, or improper disclosure of sensitive data, while respecting the privacy and personal data protection of employees.

Specialized monitoring and response structures operate to support the management of safety reports and events. In the area of cybersecurity, the Security Operations Center (SOC), operating 24/7, detects and manages events such as intrusion attempts, system anomalies, and data breaches, with the aim of preventing and limiting the theft, loss, or improper disclosure of sensitive data, including employee personal data.

Similarly, as part of integrated security, the control room Security structure, operating 24 hours a day, 365 days a year, centrally oversees the physical security systems of company offices, monitoring access and protection systems of assets and infrastructures, in order to prevent and counter unauthorized access to premises, equipment, and workstations. The Security Control Room contributes to the prevention of theft and the loss or improper disclosure of sensitive data and, in the event of incidents or critical events, coordinates the operational response by activating the planned procedures and involving the competent functions.

Privacy reporting channels

Workers can submit requests regarding the exercise of privacy rights by contacting their respective HRO Manager directly or, alternatively, submit requests regarding privacy issues to the DPO by writing to the appropriate email box.

Disclosure Requirement S1-4 - Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

[37]; [MDR-A, 68 a, b, c, d, e]; [MDR-A, 69 a, b]; [38 a, b, c, d]; [39]; [40 a, b]; [41]; [43]:

In addition to the policies on “own workers”, which provide the framework for the coherent and informed management of business activities, the Group also implements measures and resources related to the following issues:

- 1. Working conditions** that include: a) adequate wages; b) working hours; c) work-life balance; d) health and safety; e) social dialogue and collective bargaining.
- 2. Equal treatment and opportunities** which include: a) training and skills development; b) equal treatment in terms of employment and remuneration; c) diversity and inclusion; d) measures against violence and harassment in the workplace.
- 3. Other work-related rights** regarding the confidentiality and protection of the data of TIM people.

The actions are aimed at workers of Italian and foreign companies included in the social perimeter of sustainability reporting and, unless otherwise specified, are continuous and are repeated annually.

The actions are aimed at the prevention and mitigation of actual and potential negative impacts, as well as the management of risks and opportunities relevant to the workforce, contributing as a whole to the monitoring of human rights issues.

For each action, where applicable, the purpose of the intervention is indicated, specifying whether it is aimed at mitigating negative impacts and risks or at enhancing opportunities and positive impacts.

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Working conditions

The main, ongoing actions in the areas of adequate wages, working hours, work-life balance, health and safety are highlighted below; freedom of association, collective bargaining.

1a. Adequate wages

■ **Adjustment of salary levels to protect purchasing power**

Application of the National Telecommunications Collective Bargaining Agreement renewed in 2025, which introduced economic adjustments aimed at preserving the purchasing power of wages in relation to inflation and ensuring wage levels consistent with the subsistence and dignity needs of the workforce.

■ **Monitoring of salary adequacy by professional classification**

Periodic monitoring of salary levels by classification, aimed at verifying the consistency of salaries with the applicable contractual minimums and the characteristics of the tasks performed, ensuring adequate economic treatment and in accordance with the regulatory and contractual framework of reference.

These measures contribute to the mitigation of the actual negative impact related to the adoption of inadequate incentive systems (IRO 17) and to the enhancement of the opportunities deriving from the adoption of clear and measurable performance objectives (IRO 24).

1b. Working Hours

■ Flexible working

- *Methods of performing work*: application, as of July 2025, of the new agreement that allows the performance of work for three days a week remotely and two on site, on a voluntary basis and on a daily or weekly basis, favoring a more flexible management of working hours.
- *Flexibility for specific needs*: adoption, within the framework of the Agile Work Agreement, of additional flexibility measures to support individual situations, including: pregnancy (up to six weeks of agile work in pre-maternity); maternity and paternity (flexible working five days out of five until the first year of the child's life); life-saving therapies (flexible working in the five working days following therapy); highly specialized profiles. There is also the possibility of recognizing additional temporary flexibility measures for workers with serious illnesses or certified discomforts.
- *Protection of the right to disconnect*: promotion, within the Agile Work Agreement, of responsible organizational behavior and operational practices aimed at ensuring compliance with work periods and rest times, such as deferred sending of communications and scheduling meetings within working hours, to support the balance between private and professional life.
- *Monitoring the adoption of measures*: periodic verification of the application of agile work and flexibility measures through discussions with trade union representatives. In 2025, the rate of adherence to the new agreement exceeded 96% of the qualified employees of the Domestic perimeter.

Such actions, especially disconnection protection measures, help mitigate a negative impact on employee well-being (IRO 36).

1c. Work-life balance

■ Tools to support work-life balance

- *Well Working*: set of tools and solutions to support work organization, including IT equipment, mobility tools (shuttles, car sharing), organizational flexibility measures and special permits.
- *Digital tools to support work*: technological solutions that allow a more efficient management of work activities, promoting operational autonomy and the reconciliation of life and work times (company PC, smartphone).

■ Support for parenting and caregiving

- *#BParent Plan*: structured plan that includes initiatives dedicated to parenting, with particular attention to the phases of transition (pregnancy, birth, return to work).
- *Pacchetto Bebè*: support measure for new parents, aimed at accompanying the first months after birth. Additional New Parent Leave: supplementary measures with respect to the relevant regulations, aimed at promoting the management of treatment times. Back to Work Mentorship: path of accompaniment to the return from maternity, aimed at facilitating conciliation and professional continuity.
- *Professional Channel*: information and guidance channel dedicated to pregnant women and women returning from maternity leave.
- *Leave for adoption*: measures to support adoption and foster care pathways.
- *Parenting skills pathways*: training initiatives aimed at supporting the management of the parental role in balance with work activity.
- *"DRITTO" Platform*: disclosure platform that facilitates access to key public welfare measures (bonuses, tax breaks, and benefits to support families, parenting, disability, and non-self-sufficiency), through a personalized profiling system to support the management of personal and family needs.
- *TIM CARE*: initiative dedicated to caregivers, which allows TIM people to access the Liane Care platform for free to search for certified care services for the elderly, non-self-sufficient adults, children and animals, to support the management of care responsibilities. In 2025, there were 557 accesses to the platform;
- *Pregnancy Program (TIM S.A)*: program dedicated to employees and dependents during pregnancy, which provides for the continuous support of a midwife from the eighth week of pregnancy until the first year of the child's life, including exemption from co-payment of the health plan during the period of participation.
- *Reconnection with the TIME (TIM S.A)*: a program to support women returning from maternity leave, including welcome initiatives, peer support groups, career mentoring, training courses dedicated to mothers and managers, and meetings facilitated by specialized professionals.

■ Psychophysical wellbeing support services for individuals

- *Psychological support desk for individuals*: service that offers a package of free online psychotherapy sessions, with the possibility of additional meetings at a reduced rate, to support stress management and personal well-being.
- *Autogenic mindfulness and training courses*: training and digital initiatives dedicated to managing emotions and reducing stress, available on the platform.
- *Open Learning Program "Sentieri di Resilienza"*: cycle of webinars and e-learning courses aimed at strengthening personal skills in the management of emotions, energy, and phases of change.
- *Family Audit Certification*: renewal of the certification attesting to the adoption of a structured system of measures to support the reconciliation of work and private life, aimed at promoting organizational well-being, flexibility, and the balance between the professional and personal needs of employees.

- *Unlock New Habits (TIM.S.A)*: program aimed at promoting the physical and emotional well-being of employees through the support of physical educators, nurses and nutritionists, encouraging the adoption of healthy habits related to sleep, nutrition, hydration and the safe practice of physical activity.
- *Tune In to Yourself (TIM.S.A)*: mental health program aimed at the emotional well-being of employees, offering 24/7 psychological support, monthly discussion circles, face-to-face and online training activities for professionals and leaders, and initiatives for the development of social-emotional skills, including free monthly psychological counseling through a dedicated app.
- *Continuous Care Program (TIM S.A)*: A free, confidential, ongoing support program for employees and legally dependent family members, available 24 hours a day, 7 days a week, that provides assistance in personal and sensitive situations of daily life through telephone consultations and teleconsultations on request.
- *Female Versions (TIM S.A)*: Program aimed at female employees in the perimenopausal and menopausal phases, which offers free consultations with a gynecologist and nutritionist, psychosocial support services, specialist meetings with doctors who are experts in women's health, and educational initiatives aimed at the entire company population.
- **Support for personal and economic stability**
 - *Extraordinary subsidies*: financial support measures aimed at employees facing situations of particular personal or family fragility, such as serious illness, bereavement, or unforeseen events.
 - *Smartphones and business SIM cards for mixed use*, which facilitate the integrated management of work and personal needs.
 - *"TIM Special Welfare" platform for Flexible and Fringe Benefits*, which allows the conversion of the Result Award into welfare services, favoring a more flexible management of individual and family needs.
 - *Company agreements*, which offer favorable conditions on goods and services for daily use.
- **Educational and organizational support for children and family members**
 - *TIM Studio*: study guidance: initiative aimed at the sons and daughters of employees to support school and university guidance through structured pathways and digital tools. In 2025 there were 274 participants.
 - *TIM Studio Estero*: economic support through wallet for participation in school programs abroad, including monthly contributions for ancillary expenses, to support family organization. In 2025, 15 scholarships were awarded.
 - *TIM Infanzia*: service that provides financial support for expenses incurred for nursery, kindergarten or baby-sitting services aimed at supporting parenting and work-life balance. The campaign for the 2025/2026 school year registered 678 applications.
 - *TIM Estate*: initiative dedicated to the children and grandchildren of employees that offers structured, inclusive and formative summer stays, to support the management of the school closure period. In 2025, the initiative involved 1,171 children and young people with a choice among 9 stays in Italy, 2 stays abroad, and 1 itinerant stay by sailboat, for a total of 23 shifts.

Overall, the actions described contribute to preventing and mitigating the negative impacts related to inadequately supported workloads and personal responsibilities, promoting well-being, work-life balance, and personal and economic stability of employees (IRO 36), as well as enhancing opportunities linked to flexible organizational models and welfare systems that strengthen the involvement and retention of the workforce (IRO 22).

Total expenses related to work-life balance initiatives within BU Domestic amount to €789k (OpEx), while for TIM S.A. they amount to €76k (OpEx).

1d. Health and Safety

- **Health protection, health prevention and access to care**
 - *TIM My Health*: free medical assistance policy for all employees, with coverage extended to family members, which includes emergency health care, 24/7 medical support, telemedicine services, prescription issuance and home delivery of medicines.
 - *Supplementary health insurance policies*: insurances that provide supplementary health benefits compared to those guaranteed by the National Health Service, with offers at favorable conditions intended for employees and family members.
 - *Prevention check-up*: free health check-up program for employees who are at least 45 years old, with access every two years.
 - *Flu vaccination campaigns*: prevention initiatives with full reimbursement of vaccination, aimed at the corporate population.
 - *Vaccination Journey (TIM. S.A)*: Awareness-raising initiative on the prevention of infectious diseases that involves the dissemination of informative content created by health professionals.
 - *National health care plan (TIM S.A)*: aimed at eligible employees and family members, without waiting periods, based on a co-payment model managed in collaboration with an extensive hospital network and two of the main health insurance companies in the country, in order to ensure fair and continuous access to medical care.
- **Accident prevention and safety management in the workplace**
 - *Health and safety management system*: structured risk management pursuant to Legislative Decree 81/08, through the drafting and updating of the Risk Assessment Document (DVR) by the Health, Safety & Environment (HSE) function, the management of accidents and occupational diseases and the monitoring of the related statistical data.
 - *Emergency management, first aid and operational risk management*: preparation and updating of emergency plans, appointment and training of fire prevention and first aid personnel, planning and execution of evacuation drills, as well as

carrying out periodic inspections aimed at identifying and implementing the most suitable risk reduction measures, even in extraordinary situations.

- **Health surveillance and risk factor monitoring:** implementation of health surveillance protocols for workers exposed to the main regulated risks (including work at the video terminal, work at height and exposure to electromagnetic fields), according to the frequencies provided for by current legislation, which in 2025 affected about 4,500 workers.
- **Training, information, listening, and safety culture:** provision of mandatory and periodic training on health and safety, information and awareness-raising activities through the company intranet and dedicated campaigns, as well as the use of structured reporting channels for the collection of workers' indications on potential hazards, monitoring the application of regulations and continuous improvement of the measures adopted. In 2025, a total of 39,349 hours of training were provided.
- **Management engagement:** activities aimed at developing and consolidating a safety culture, promoting risk awareness and the adoption of responsible behaviors regarding health and safety at work.
- **Technical prevention tools:** periodic redefinition of the environmental and safety requirements necessary to mitigate the risks present in the workplace, including the carrying out of instrumental surveys in the workplace, aimed at ensuring adequate and safe environmental conditions.
- **Organizational and operational prevention safeguards:** implementation of prevention support tools, including the definition of individual risk profiles by task, the assignment of health, safety and environmental powers pursuant to Legislative Decree 81/08, the use of computerized systems for reporting anomalies, and periodic verification by the supervisors.
- **Health and Safety Management System (ISO 45001):** adoption and maintenance of a management system compliant with the ISO 45001 standard, active in the Domestic sector, aimed at the prevention of accidents and occupational diseases and the continuous improvement of health and safety conditions in the workplace;
- **Bem+Estar Week (SIPAT) (TIM S.A.):** Mandatory annual initiative aimed at promoting a culture of health, safety, and environmental protection, which includes awareness campaigns and training sessions for all employees, in accordance with Brazilian legislation on occupational health and safety.

The actions described contribute to mitigating the negative impacts related to deficiencies in prevention and training measures in the field of occupational health and safety, reducing the risk of occupational accidents and diseases and improving the working conditions of its own workforce (IRO 15).

Overall, in 2025 total identifiable expenses for the Domestic BU amount to €508k (OpEx) and €15k (CapEx), while TIM S.A. recorded €24.554k (OpEx) and €6.895k (CapEx).

1e. Social dialogue and collective bargaining

- **Renewal of the National Collective Bargaining Agreement and oversight of the industrial relations system**
 - **Renewed TLC National Collective Bargaining Agreement:** adoption and application of the national collective bargaining agreement for the telecommunications sector, renewed in 2025, which regulates the exercise of trade union rights, the methods of representation, and the functioning of industrial relations, ensuring a framework of shared and updated rules.
 - **Exercise of trade union representation rights:** guarantee of the methods of participation and workers' representatives, including the possibility of conferring delegation for the retention of the union contribution in the paycheck, in accordance with the applicable legislation and collective bargaining.
 - **Industrial Relations Protocol:** implementation of the TIM S.p.A. Industrial Relations Protocol, signed in February 2025, which promotes a structured and continuous participatory model, based on dialogue between the company and trade union representatives.
 - **Thematic joint commissions:** operation of joint commissions dedicated to the main areas of common interest, including welfare, health and safety, training and industrial relations, aimed at periodic comparison, information sharing and continuous improvement of working conditions.

The actions aim to monitor the risks deriving from human rights violations in the company and along the supply chain (IRO 38) that can result in litigation, reputational damage, and operational criticalities, with effects also on collective bargaining, increasing the risk of trade union conflict and influencing the negotiation dynamics on protections, clauses, and working conditions.

2. Equal treatment and opportunity

The following highlights the main, ongoing actions in training and skills development, gender equality and equal pay; diversity and inclusion.

2a. Training and development

- **Advanced training, leadership and managerial development**
 - **Advanced Training Initiatives for colleagues under 35:** programs that include participation in the Coaching Academy; membership in technological academies (IoT and 5G); participation in further Advanced Training courses in collaboration with academic institutions and qualified partners (LUISS MBA, 5G Academy of the Federico II University of Naples, IoT Academy at CNI and BI-REX of Bologna, WIBO Leadership Academy); language coaching courses; MIP observers; master class on Excel, AI and communication; Valore D initiatives. In 2025, a total of 615 participants (of which 347 belong to TIM)
 - **Managerial development:** coaching and mentoring programs aimed at executives and managers, complemented by enrollment in specialized and managerial courses. Initiatives include the Leadership Academy, which involved 14 Function Managers, and participation in the POLIMI Observers, with the involvement of 250 managers and executives. During the year, advanced management training courses were also continued, including LUISS MBA, MBA and POLIMI Executive

Master, Executive Master in Business & Technology of POLITO and the TECHNE 2025 Master at BI-REX in Bologna that covered 15 managers.

- **PlayMaker:** managerial training project aimed at about 850 executives and managers, structured as a path dedicated to the development of skills on new technologies, in particular artificial intelligence, and human skills to support the change management processes generated by innovation.
- **Leadership Academy (TIM S.A):** program dedicated to the development and strengthening of leadership skills, aimed at preparing the managerial pipeline, promoting behaviors consistent with company values, and supporting a culture of continuous learning and sustainable performance.
- **People development, coaching and mentoring**
 - **Individual development plans:** individual coaching courses aimed at TIM personnel, Group Companies and executives. In 2025, 89 people were involved for a total of approximately 900 hours.
 - **Collective development plans:** group coaching initiatives involving 54 colleagues, for a total of 648 hours of training.
 - **Age Empowerment Program:** intergenerational mentoring initiatives aimed at fostering generational dialogue, cultural contamination, and strengthening the motivation and employability of senior employees. In 2025, 82 colleagues were involved; the activities, started at the end of the year, will continue during 2026.
 - **Development of language skills:** Fluent Future project of individual language coaching, dedicated to 300 colleagues, for a total of 12,000 hours of training, with the achievement of language certification for 177 participants.
 - **Black Pearls Program (TIM S.A):** Career development and acceleration program aimed at black professionals with leadership potential, aimed at strengthening managerial skills and promoting access to positions of responsibility within the organization.
- **Performance evaluation and management**
 - **Staff Potential Assessment:** conducting in 2025 assessments dedicated to entry-level managerial positions (Agile Assessment) and to roles of responsibility with managerial weight (Managerial Assessment), to support professional development paths.
 - **Skill Assessment on professional roles:** the Development function oversees skills assessment activities to support the mapping of professional roles. In 2025, 256 people were involved, including 164 from the Consumer function and 92 from the Enterprise perimeter.
 - **Staff assessment:** In 2025, about 170 assessments were carried out dedicated to entry-level managerial positions (Agile Assessment) and to roles of responsibility with managerial weight (Managerial Assessment), to support professional development paths.
 - **Performance development:** based on Continuous Feedback, involving around 6,400 people through a dedicated app that promotes dialogue, transparency and continuous improvement. The "The Power of Feedback" community fostered the comparison and sharing of experiences. The OKR methodology was also tested in the Enterprise perimeter, involving 34 Ambassadors and 270 hours of training.
 - **Motivation and employability assessment:** annual campaigns aimed at the corporate population of TIM and the Group Companies, designed to measure behaviors, results orientation, and professional growth.
 - **Assessment-Based Growth Plans:** to identify areas for improvement. Actions include training, coaching, mentoring, special projects and networking, in line with the company's medium- and long-term strategic goals. Incentive systems include challenging and sustainable goals to improve business productivity.
- **Digital transformation skills and certifications**
 - **Reskilling initiatives:** training courses to support digital transformation. The training focused on the development of technological skills, professional skills related to processes and operations, as well as soft skills to support digitization. In 2025, initiatives involved a total of 13,436 employees, for a total of 262,582 hours of training.
 - **AI Training:** training in Artificial Intelligence, as a central lever of digital transformation. The training courses covered the entire spectrum of AI skills, including literacy, advanced specialization in technologies and languages, prompting methodologies and use of tools, as well as soft and managerial skills to support the adoption of technology. The training offer has combined the development of skills with the promotion of a conscious and responsible use of AI, in line with the provisions of the AI Act. To this end, TIM has made available to the entire company population a catalog of courses dedicated to AI skills, from basic to advanced levels, both on the TIM Open Learning internal platform and on external partner platforms (including Udemy, Google and Data Masters). Overall, in 2025 AI training was delivered in e-learning, online and in-person webinars for a total of 72,707 hours, involving 11,494 people.
 - **Technological and methodological certifications:** in the context of digital transformation, particular attention has been paid to the certification of skills, as a tool for professional qualification and formal recognition of specialist skills. In particular, technological certifications attest to skills on specific technologies, platforms and languages, while methodological certifications concern the adoption of frameworks, organizational models and structured work approaches (such as, by way of example, agile, project and service management methodologies). During 2025, 350 new technological certifications were obtained and 450 renewal courses were completed. With reference to methodological skills, 121 new certifications were obtained and 42 renewals were completed in the same period. At the end of the year, a total of 1,496 technological certifications and 2,876 methodological certifications were active, involving respectively 1,090 and 927 employees.
 - **Digital Wave (TIM S.A):** initiative aimed at developing digital and technological skills that includes training courses in Artificial Intelligence, data analytics, cybersecurity, agile methodologies, digital marketing and 5G, with the aim of supporting innovation and improving business performance.
 - **Generational Inclusion Program 50+ (TIM S.A):** training program aimed at employees over the age of 50, designed to promote the continuous updating of skills, openness to change, and the adoption of new technologies required by the labor market.

The total identifiable expenses for training and development initiatives within BU Domestic amount to €3.793k (OpEx), while TIM S.A. recorded €783k (OpEx).

Overall, the actions described contribute to achieving positive impacts deriving from the development of skills and employee involvement in support of an inclusive and productive work environment (IRO 5) and the opportunity linked to investments in training that involve the attraction and retention of a competitive workforce (IRO 30).

2b. Equal treatment in employment and remuneration

■ **Gender objectives integrated into the Strategic Plan and management evaluation systems**

Gender equality objectives are integrated into the Group's Strategic Plan and translated into measurable objectives in management incentive systems, in order to prevent and mitigate unequal treatment in the field of employment and pay. The objectives concern the presence of women in the company, the coverage of managerial positions by women, equality in the selection and hiring processes and the reduction of pay differences in managerial clusters.

■ **Monitoring of equal employment and pay conditions**

Implementation of a structured monitoring of gender indicators in the field of employment and pay, with periodic data analysis and comparison with market benchmarks. The evidence that has emerged is used to identify any deviations and guide improvement interventions on personnel management processes, in support of fairness and transparency of treatments.

■ **Certification in support of gender equality**

Annual renewal of the UNI/PdR 125:2022 certification obtained in 2023, which certifies the adoption of a structured system of organizational measures and processes aimed at guaranteeing equal opportunities and equal treatment in the field of employment and remuneration, with reference to the selection, development, remuneration, and career advancement processes.

Overall, the actions described contribute to mitigating the risk of gender inequalities and limited transparency in pay systems and career paths, which could compromise the attraction and retention of talent (IRO 35).

2c. Inclusion and enhancement of diversity

■ **Inclusion of people with disability and specific needs**

- *Communication support for deaf employees who use sign language*: activation of LIS interpreting services in person, remotely and by telephone, including the adoption of the "4 Work" service in collaboration with Veasyt and the extension of LIS video-interpreting to company webinars.
- *Disability Management Plan*: initiative aimed at guaranteeing people with disability inclusive and adequate working conditions, through the adoption of special equipment and dedicated organizational solutions.
- *Awareness and training on SLD and cognitive disabilities*: implementation of information and training initiatives aimed at the corporate population, including through the "SLD no Problem" project, aimed at promoting awareness and inclusion of people with specific learning disabilities.
- *Dyslexia Friendly Company certification*: renewal of the certification to support the adoption and maintenance of inclusive organizational, training, and communication practices for people with SLD, aimed at reducing cognitive barriers.
- *Workability Assessment*: activation of personalized assessment paths for colleagues with disability, aimed at identifying organizational adaptations, tasks, and operating methods.
- *Adaptation to the European Accessibility Act*: implementation of a structured path of adaptation to European regulations on accessibility, including the census and assessment of accessibility of websites and business applications.
- *Removal of digital barriers*: implementation of corrective actions to improve the accessibility of digital services and tools and reduce technological barriers.
- *Inclusive technological and IT equipment*: implementation of dedicated programs, including the "Deaf Included" project, aimed at facilitating the communication of colleagues with hearing disability through supplementary technological equipment, and the "Nobody Excluded" project, aimed at providing specific IT equipment to support people with disability.
- *Accessibility training*: specialist training course aimed at developing internal skills in digital and organizational accessibility, addressed to all employees and supported by dedicated digital content.
- *Enhancement of individual and cultural differences*.
- *Awareness on diversity and inclusion*: carrying out awareness-raising initiatives aimed at promoting an inclusive corporate culture that respects individual and cultural diversity.
- *Training and internal communication on diversity and inclusion*: activation of training activities and internal communication initiatives aimed at enhancing differences and combating stereotypes and prejudices in work contexts.
- *Involvement of employees on inclusive behaviors*: promotion of engagement initiatives aimed at spreading inclusive and responsible behaviors within the organization.
- *Diversity & Inclusion Management System (ISO 30415)*: adoption and maintenance of a management system compliant with the ISO 30415 standard, aimed at integrating the principles of diversity and inclusion into resource management processes and organizational practices, in support of fair, inclusive, and respectful work environments.
- *Diversity & Inclusion Program (TIM S.A.)*: Structured business program of diversity and inclusion based on the pillars of gender, people with disability, LGBTI+ communities, race/ethnicity and generations, aimed at ensuring equal opportunities, inclusion and representativeness at all levels of the organization.

With reference to actions related to governance and monitoring of inclusion initiatives and inclusion and equal opportunities programs, these initiatives contribute to pursuing the opportunity linked to the enhancement of diversity and an inclusive work environment, which favor talent attraction and corporate reputation (IRO 20), and to mitigating the risk related to gender inequalities and limited transparency in pay systems and career paths that can compromise talent attraction and retention (IRO 35).

Overall, in 2025 total identifiable expenses for diversity and inclusion initiatives within BU Domestic amount to €239k (OpEx), while TIM S.A. recorded €191k (OpEx).

2d. Measures against violence and harassment in the workplace

■ **Emergence and case management**

- *Reporting channels to support prevention measures*: use of confidential channels to facilitate the emergence of incidents of violence, harassment and inappropriate behavior and allow their management, in line with the complaints management system and reporting mechanisms described in paragraph S1-3 "Processes to remedy negative impacts and channels that allow own workers to raise concerns".
- *Network of internal contacts (Ambassadors)*: establishment of a network of specially trained internal contacts, who act as listening points and provide confidential guidance in support of people involved in situations of violence or harassment.

■ **Protection and support for victims**

- *Victim support pathways*: activation of dedicated support paths for people involved in incidents of violence or harassment, which include guidance, accompaniment, and access to specialist assistance services, including through the involvement of qualified external professionals.
- *Protective measures for employees who are victims of domestic violence*: Implementation of dedicated interventions for victims of domestic violence, including confidential procedures, coordination with local services and specialized support centers, and the provision of a financial contribution of up to €24 k over two years, aimed at supporting their needs for housing security and personal and family protection.

■ **Prevention, awareness and capacity building**

- *Structured awareness and prevention initiatives*: implementation of information campaigns and awareness-raising initiatives on the issues of violence, harassment, bullying and micro-aggressions, through internal communication tools and dedicated content aimed at the corporate population.
- *Targeted training on violence and harassment*: providing training courses dedicated to employees, managers, and key figures, aimed at recognizing inappropriate behavior, preventing risks, and properly managing reported situations. In 2025 we delivered 1,187 hours of training.
- *Collaborations with specialized organizations*: activation of collaborations with competent external organizations on the issues of violence prevention and victim protection, in support of awareness-raising, training, and case management activities.

Overall, in 2025 total identifiable expenses for measures against workplace violence and harassment within BU Domestic amount to €12k (OpEx).

The actions mentioned above help mitigate the risks arising from human rights violations, in the company and along the supply chain, which entail legal liabilities, reputational damage, and operational impacts, promoting a safer, more respectful, and compliant working environment.

3. Other work-related rights

The actions illustrated below are tools through which the organization guarantees the protection of privacy and personal data protection. Some of the initiatives described, appropriately highlighted, involve both workers and end users of the services (ESR S4).

3a. Privacy and personal data protection

■ **Privacy management model**

The TIM Group adopts a privacy operating model aimed at ensuring the correct application of the legislation on personal data protection, developed according to the privacy-by-design principle and subject to periodic improvements. The model is based on the implementation and constant interpretation of regulatory provisions, on the definition of roles and responsibilities in personal data processing, on the management of information for the different categories of data subjects, including employees, customers and end users, on the assessment of risks through the Data Processing Registers pursuant to the GDPR and on the adoption of appropriate technical and organizational measures. The operation of the model is governed by the "Framework for the Application of personal data protection legislation in the TIM Group", constantly updated and available on the company intranet.

In Brazil too, TIM S.A. adopts a privacy operating model compliant with the LGPD (Law no. 13.709/2018) based on the principles of privacy-by-design and a process of continuous improvement. The model provides for the monitoring of regulatory developments, the definition of roles and responsibilities in processing, the management of information to data subjects, the assessment of risks associated with processing activities and the adoption of appropriate technical and organizational measures to ensure an appropriate level of security. The framework is represented by the "Privacy Policy" and by additional policies, constantly updated and available on company channels. TIM S.A. also makes available on its institutional website a Privacy Center in which the methods of collection, use, sharing, storage, and personal data protection of customers and end users are described in accordance with current Brazilian legislation.

■ **Supervision of the Data Protection Officer and management of data breaches**

As part of the privacy operating model, the appointment of the data protection officer (DPO) of TIM and the group companies is foreseen, in continuity from the date of application of the GDPR (May 2018). The DPO performs advisory, training, information, and surveillance functions, supporting the Company Functions in the correct personal data processing of own workers, customers, and end users, providing opinions on the assessment of risks to the rights and freedoms of data subjects, coordinating the management of data breaches, and taking care of relations with the Guarantor for personal data protection.

In support of this monitoring, the TIM Group has defined policies, implemented procedures and security measures to prevent unlawful processing of personal data and a privacy compliance control system that provides for periodic self-assessments and multi-level controls, including second-level controls planned by the Compliance Department in collaboration with the DPO, consisting of periodic monitoring and sample checks. The Privacy function, within the scope of the responsibilities assigned to the DPO, also carried out training and consultancy activities during 2025, issued opinions on company initiatives and projects, coordinated the management of data breaches, and handled relations with the Guarantor for personal data protection.

In Brazil, TIM S.A. implements safeguards and initiatives regarding personal data protection in line with the Group's model and practices and in accordance with the General Law on the Protection of Personal Data (LGPD – Law no. 13.709/2018). The governance system is based on the appointment of the data protection officer (DPO), in continuity with the entry into force of the legislation, supported by the Privacy Support Team. The DPO carries out advisory, information and supervisory functions, coordinates with the Security Team on the management of personal data breaches, and manages relations with the national agency.

The organizational model also provides for the periodic review of internal documentation and the adoption of digital tools for the management of the rights of data subjects. TIM S.A. has adopted dedicated policies and procedures, including preventive and corrective technical and organizational measures for the mitigation of cyber threats and a procedure for the management of data breaches compliant with the LGPD.

The compliance control system, which involves the DPO, Privacy Team, and Security Information, includes periodic self-assessments, monitoring of processing, application of the principles of privacy-by-design and by default, and training activities. A structured procedure is also in place for the recording of events and the management of security incidents, with or without personal data breaches, aimed at ensuring a timely, appropriate, and traceable response.

■ **Training and awareness on personal data protection**

The TIM Group promotes the dissemination of the culture of personal data protection through training and information activities aimed at employees and workers, both during the onboarding phase and during the employment relationship. New hires are required to complete an online privacy course available on the company intranet. In 2025, specific training interventions were also carried out, involving a total of 206 people between TIM staff and commercial partners of the Consumer sales network, with a focus on telemarketing and teleselling legislation and on the requirements of the relevant Code of Conduct, to which TIM adhered in February 2025.

TIM S.A. also promotes the dissemination of the culture of personal data protection through training and information activities aimed at employees and workers, both during the onboarding phase and during the employment relationship. New hires are required to complete an online privacy course available on the company intranet. In 2025, specific training sessions were also provided to TIM business partners, Anti-Fraud functions and all Leaders, with the aim of strengthening the awareness and attention of personnel involved in personal data processing.

All actions together contribute to mitigate the risk of non-compliance with privacy laws and unauthorized access to personal data (IRO 26) and to prevent the risk of human rights violations related to personal data processing in the company (IRO 38), reducing the likelihood of legal, reputational, and operational impacts.

3b. Information security and cybersecurity

TIM protects the personal data of workers, customers, and end users, as well as company information and information assets, through a structured information security and cybersecurity management system, aimed at preventing potential impacts resulting from unauthorized access, misuse, security incidents, and data breaches.

■ **Organizational structures and information security governance**

Information security and cybersecurity management is based on clearly defined roles and responsibilities, formalized procedures, and cross-functional coordination structures. The overall governance is led by the Chief Security Office which, in coordination with the relevant directorates (including the Chief IT Group Office and the Chief Technology Office), ensures the implementation of preventive and corrective measures for the mitigation of cyber threats and compliance with the regulatory requirements and internal standards of the Group. In this context, in 2025 the Chief Security Office coordinated and monitored security governance activities, which included quarterly meetings of cross-functional committees, the definition and subsequent monitoring of risk KPIs, as well as the implementation of corrective plans for critical processes and systems.

In Brazil, TIM S.A. implements an organizational model dedicated to information security and cybersecurity, in line with Group practices and in compliance with applicable local legislation, including ANATEL Resolution no. 740. The model includes functions specialized in Business Continuity & Cyber Governance (for the coordination of the security regulatory framework and cyber awareness and training initiatives), Identity & ICT Risk Management (for the analysis of ICT risks and the governance of digital identities throughout their lifecycle), Cyber Intelligence (for the monitoring of emerging threats), Cybersecurity Operations Center (for the operational management of security events, vulnerabilities and security incidents) and Cyber Solution & Innovation (for the definition of architectural standards and the evolution of security solutions).

■ **Information security management system (ISMS)**

The protection of information and the reliability of digital services are guaranteed by an information security management system (ISMS) certified according to the international standard ISO/IEC 27001:2022, adopted both in the Domestic field and in TIM S.A. The information security management system is also integrated with the controls provided for by ISO/IEC 27017 and ISO/IEC 27018, applied respectively to the security of cloud services and personal data protection in the cloud environment.

The ISO/IEC 27001 certification certifies the implementation of organizational, procedural and technical measures aimed at protecting information and information assets, as well as the adoption of structured processes for risk management, monitoring and continuous improvement of information security, in line with the Group's practices and the regulatory framework applicable in the different operating contexts.

In 2025, the ISMS was updated and continuously improved through the implementation of an internal and external audits plan, the updating of the IT risk assessment, the implementation of risk treatment plans, and periodic training on the ISMS for the functions involved. These activities have contributed to the strengthening of the information security control system, with positive effects also on the levels of security experienced by consumers and end users.

Both in the Domestic sector and in TIM S.A., an information security management system compliant with the international standard ISO/IEC 27001 is adopted. The certification certifies the implementation of organizational, procedural, and technical safeguards aimed at protecting information and information assets, as well as the adoption of structured processes for risk management, monitoring, and continuous improvement of information security, in line with the Group's practices and the regulatory framework applicable in the different operating contexts.

■ **Prevention, monitoring and continuous improvement of safety.**

Information security is monitored through the Group's cybersecurity processes, which ensure the continuous monitoring of security events and the timely management of incidents potentially relevant to personal data protection and information assets. TIM takes preventive and corrective technical and organizational measures to counter cyber threats and process or system vulnerabilities, including specific countermeasures for the mitigation of DDoS attacks and other events potentially impacting the confidentiality, integrity and availability of information.

To support these presidencies, an internal information system is operational that makes structured information available to employees on the risks associated with the activities carried out and on the prevention and protection measures to be adopted, promoting behavior that is aware of and consistent with the security requirements of the information processed.

The effectiveness of the measures taken is verified through specific KPI of a systemic and operational nature, aligned with company objectives and aimed at continuous improvement. In 2025, the indicators monitored include the percentage of recovery plan returns, equal to 80%, as well as the planning and implementation of audits on the main processes, with a minimum target of at least one annual audit, fully achieved during the year.

Audits and risk analysis activities make it possible to verify the compliance of the ISMS with ISO/IEC 27001 and to identify any opportunities for improvement of information security policies and practices.

To complete the safety and monitoring measures described, TIM uses a structured Impact Analysis & Risk Assessment process to assess the relevance of the impacts deriving from the loss or compromise of information and systems and support the definition of intervention priorities. The results of the analyses feed into the Risk Treatment Plan and the Management Review, ensuring a proportionate and effective approach to the mitigation of cyber risks.

In Brazil, TIM S.A. adopts a continuous approach of prevention, detection and response to computer incidents, through monitoring systems, threat analysis activities, simulations and improvement plans of defense tools, ensuring the protection of networks, data and information assets.

All actions contribute overall to mitigate the negative impact actually caused by the vulnerability of computer systems (IRO 1) and in general to mitigate the risk related to non-compliance with privacy laws and unauthorized access to personal data (IRO 26).

In addition to the specific actions described above, TIM ensures that its practices do not cause or contribute to significant negative impacts on the workforce through ongoing dialogue, carried out through organizational climate analysis, monitoring of participation in agile working, and the inclusion in training courses of modules dedicated to occupational health and safety.

The total expenses identifiable for the actions described in the disclosure requirement S1-4 "Interventions on significant impacts for the Group's workforce and approaches for managing significant risks and pursuing significant opportunities in relation to the Group's workforce, as well as the effectiveness of such actions" amount to €4.641k (OpEx) and €15k (CapEx) for the Domestic BU and €25.603k (OpEx) and €6.895k (CapEx) for TIM S.A.

Metrics and targets

Disclosure Requirement S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

[MDR-T, 81 a, b]

With reference to the Group's social targets, the objectives are currently being updated as part of the definition of the new business plan and will be formalized and communicated during 2026, in line with the new strategic plan.

In the meantime, the Group maintains a structured system for monitoring social performance, aimed at continuously monitoring the impacts, risks, and opportunities associated with its own workforce. The system, integrated into company processes and internal governance, is based on key performance indicators (KPI) defined in line with applicable legislation and industry best practices, and allows the effectiveness of the policies and actions implemented to be assessed over time. Specifically:

- in the field of health and safety at work, the number and rate of accidents, the hours of training provided, and the number of workers subjected to health surveillance are monitored;
- in the field of training and skills development, the percentage of employees involved in periodic performance evaluation and professional development processes, the average number of hours of training by gender and professional category, and participation in advanced training courses are recorded;

- with reference to incentive and welfare systems, the adequacy of salaries with respect to the applicable contractual minimums and adherence to corporate welfare programs are assessed;
- in terms of diversity and inclusion, the composition of the company's population by gender, age, and level of classification, the presence of women in leadership positions, the percentage of female hires out of the total number of new hires, and the trend in the pay gap are monitored; the rate of adherence to flexible working models, access to and use of family leave, participation in parenting support programs and access to psychophysical well-being support services are also noted;
- in the field of cybersecurity and personal data protection of employees, the number of incidents, the average response and resolution times, the coverage of mandatory training on privacy and cybersecurity, and the reports received through the dedicated channels are monitored;
- With reference to respect for human rights and the prevention of discrimination and harassment, the number of reports received through the whistleblowing channel, the average management times, and the hours of training provided on ethical and behavioral topics are monitored.

These indicators fall within the scope of internal governance and are subject to monitoring by the competent bodies. In Italy, monitoring is also entrusted to specific dedicated bodies, including the Steering Committee for Gender Equality, and is supported by certification systems such as the UNI/PdR 125:2022 gender equality certification, since 2023.

In Brazil, TIM S.A. has identified an additional indicator in the area of training, which provides for the involvement of at least 90% of employees in structured programs for the development and updating of digital skills. The indicator is expressed as a percentage of employees trained out of the total workforce and covers the direct employees of the company. Participation is monitored through the company's training platforms, which track training hours, participation, and completion by personnel category.

For further information on the results achieved with respect to the objectives of the previous Plan related to the workforce, please refer to paragraph ESRS 2 SBM-1 "Strategy, business model and value chain of the "General Information" section.

Disclosure Requirement S1-6 - Characteristics of the undertaking's employees

[MDR-M, 77 a]; [50 a, b, c, d i, ii, e, f]

Below are the data relating to the workforce, showing the number of employees by gender and by country, the type of contract, and the turnover rate of personnel.

The data are expressed in whole heads and refer both to employees in force as of December 31, 2025 and to the average number of employees for the financial year. Temporary workers are not included, unless otherwise specified.

Employee data for TIM S.p.A., Telsy S.p.A., Telecontact Center S.p.A., Telecom Italia Sparkle S.p.A., TI Trust Technologies S.r.l., Olivetti S.p.A. and Noovle S.p.A. are extracted from the Group's HR information systems; for other companies, data are collected by the respective administrative and personnel management systems. Company systems allow for the determination of the average number of permanent and fixed-term employees, as well as the average distribution by gender, both overall and by contract type.

The number of employees is also reported in the consolidated financial statements in the "Detailed Tables – Consolidated Data" section of the report on operations. Compared to this section, the figure shows 121 fewer employees, due to the inclusion of agency workers and the consideration of the companies within the Sparkle perimeter as "discontinued operations."

The "Other" and "Not disclosed" columns, required by the ESRS scheme with reference to unspecified or undeclared gender, are not shown in the tables as the related values are zero for all the exercises presented.

[50 a]: Employees by gender - TIM Group

	UOM	2025			2024		
		Women	Men	Total	Women	Men	Total
Total employees - at the end of the period (head count)	n	12,989	13,188	26,177	13,181	13,643	26,824
Employee breakdown by gender - at the end of the period	%	49.62	50.38	100.00	49.14	50.86	100.00
Total employees - period average (head count)	n	13,059	13,424	26,483	13,280	13,797	27,077
Employee breakdown by gender - period average	%	49.31	50.69	100.00	49.04	50.96	100.00

At December 31, 2025, **the total number of employees of the TIM Group stood at 26,177, down 2.4%** compared to 2024. The figure for the year's averages also shows a decrease of 2.2%, from 27,077 to 26,483 units.

The composition by gender remains substantially stable and balanced. At the end of the period, women represented 49.62% of the workforce, confirming a balanced gender mix and a slight improvement compared to the previous year.

[50 a]: Employees by country

	2025		2024	
	Employees at the end of the period	Employees period average	Employees at the end of the period	Employees period average
Italy	17,231	17,356	17,458	17,683
Brazil	8,702	8,884	9,123	9,152

Employee representation by country includes only countries where Group companies have at least 50 employees and represent at least 10% of the Group's total employees. The "Italy" item includes TIM S.p.A., Telecom Italia Sparkle S.p.A., Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies S.r.l., QTI S.r.l. and Mindicity S.r.l. in the item "Brazil" is considered TIM S.A.

In 2025, Italy remains the Group's main country of presence, representing about 66% of the total workforce (65% in 2024), while Brazil accounts for about 33% (34% in 2024).

[50 b]: Employees by type of contract and gender - end of period - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Permanent	n	12,897	13,102	25,999	13,090	13,533	26,623
Fixed term	n	92	86	178	91	110	201
Variable hours	n	—	—	—	—	—	—
Total employees	n	12,989	13,188	26,177	13,181	13,643	26,824

[50 b]: Employees by type of contract and gender - period average - TIM Group

	UOM	2025			2024		
		Women	Men	Total	Women	Men	Total
Permanent	n	12,962	13,319	26,282	13,177	13,721	26,899
Fixed term	n	97	105	201	102	76	178
Variable hours	n	—	—	—	—	—	—
Total employees	n	13,059	13,424	26,483	13,280	13,797	27,077

The tables show a contractual structure strongly oriented to indefinite contracts, which represents over 99% of the workforce both at the end of the period and on average for the year, in line with the previous year.

In 2025, there is a slight reduction in the total number of permanent employees, consistent with the decrease in the workforce already highlighted at the overall level. The fixed-term component remains residual and is mainly linked to the management of business volumes in TIM Retail stores.

[50 c]: Employee turnover - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Total employees	n	12,989	13,188	26,177	13,181	13,643	26,824
Employees who have left the company	n	1,612	1,726	3,338	1,357	1,582	2,939
Employee turnover rate	%	12.41	13.09	12.75	10.30	11.60	10.96

In 2025, the Group's total number of **employee turnover**, amounting to 3,338, **increased by 13.6% compared to 2024**.

This rise is also reflected in the increase of the turnover rate, **which reached 12.75%** (+1.79% compared to 2024). This indicator measures the ratio between employee exits and the average workforce, thus providing an assessment of turnover intensity relative to the size of the workforce.

These indicators are influenced by the contribution of TIM S.A., where turnover is higher due to the characteristics of the Brazilian labor market, which is generally more flexible and marked by greater mobility compared to the Italian context.

Disclosure Requirement S1-8 Collective bargaining coverage and social dialogue

[MDR-M, 77 a], [60 a, b, c]; [63 a, b]; [RA 70]

The TIM Group recognizes the central role of collective bargaining and social dialogue in defining working conditions and managing industrial relations. The coverage of employees by collective agreements constitutes a structural element of the Group's organizational model and reflects the commitment to ensure uniform and transparent safeguards.

[60 a]: Employees covered by collective agreements - TIM Group

	UOM	2025	2024
Total employees	n	26,177	26,824
Employees covered by collective bargaining agreements	n	26,177	26,824
	%	100.00	100.00

In line with this approach, the percentage of own employees covered by collective agreements, **in all the Group's companies, is equal to 100%**.

Specifically, in Italian companies, the Group applies specific types of National Collective Bargaining Agreements (CCNL) depending on the professional category.

With reference to personnel with the qualification of Manager, the contractual coverage is guaranteed by two National Collective Bargaining Agreements, which affect 100% of the managers of the Italian companies of the Group: the National Collective Bargaining Agreements for Executives of Goods and Services Producing Companies (CCNL Industrial Executives), applied to 268 executives, and the national collective bargaining agreement for Executives of Distribution and Services Tertiary Companies, applied to 1 executive.

Also for personnel with the qualification of Employees and Managers, the coverage is total and is mainly divided into two National Collective Bargaining Agreements: the National Collective Bargaining Agreements for employees of companies providing telecommunications services (CCNL TLC), which covers 15,474 employees, and the National Collective Bargaining Agreement for employees of Tertiary, Distribution and Services companies, which applies to 983 employees.

In countries other than Italy, contractual coverage is guaranteed in accordance with the applicable local regulatory and industrial relations systems.

Regarding union representation, the Group operates in compliance with national regulations and industrial relations systems in force in the countries in which it operates. The methods of social dialogue and worker representation are defined in accordance with the models established by individual legal systems and applicable collective agreements. Within the European Economic Area (EEA), no transnational employee representation bodies, such as the European Works Council (EWC), nor similar structures have been established for European Companies (SE) or European Cooperative Societies (SCE).

[63 a]: Employees covered by employee representatives - TIM companies in EEA countries¹

	UOM	2025	2024
Total employees from EEA countries	n	17,231	17,458
Number of workers with their representatives	n	16,566	17,115
	%	96.14	98.04

In 2025, **96.14% of employees were covered by worker representation**, down from 98.04% in 2024. The change is attributable to the cessation of a Company Union Representation (RSA), which was subsequently not reconstituted by the trade unions.

[RA 70]: Coverage of collective bargaining and social dialogue

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees - EEA (for countries with > 50 empl. representing > 10% total employees)	Employees - non-EEA (estimate for regions with >50 empl. representing >10% total employees)	Workplace representation (only EEA) for countries with > 50 empl. representing > 10% total employees)
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	Italia	Brasile	Italia

¹ The EEA scope includes companies with a total number of employees equal to at least 10% of the Group's total employees. The companies considered are: TIM S.p.A., Telecom Italia Sparkle S.p.A., Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A, Telsy S.p.A., TIM Retail S.r.l, TI Trust Technologies S.r.l., QTI S.r.l., Mindicity S.r.l.

Disclosure requirement S1-9 - Diversity metrics

[MDR-M, 77 a]; [66 a, b]

The TIM Group monitors the composition of its workforce through specific diversity metrics, in order to ensure transparency and foster an inclusive and balanced work environment. The main indicators relating to distribution by gender and age groups are reported below, in accordance with the ESRS standards.

The “Other” and “Not disclosed” columns, required by the ESRS scheme with reference to unspecified or undeclared gender, are not shown in the tables as the related values are zero for all the exercises presented.

[66 a]: Distribution of employees by gender at senior management level - TIM Group

	UOM	2025			2024		
		Women	Men	Total	Women	Men	Total
Total employees at senior management level	n	4	15	19	3	14	17
Gender distribution at senior management level	%	21.05	78.95	100.00	17.65	82.35	100.00

The TIM Group defines "Senior Management" as all the executives, with the exception of the Group Chairman, who play key roles in the development and implementation of company strategies and who report directly to the Administrative and Supervisory Bodies or the Group CEO. The composition of the Senior Management is represented on the first page of the company organization chart that represents the macro organizational structure

In 2025, the Group's Senior Management consists of 19 people, up from 17 in 2024. The female component increased from 3 to 4, with an incidence that rises to 21.05%, recording an improvement of 3.4%.

Macro organizational structure as of 12/31/2025



The composition of the Group's workforce is also analyzed according to age groups, in order to represent the generational balance and the overall demographic structure.

[66 b]: Employee distribution by age group - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Employees under 30 years old	n	977	934	1,911	995	1,012	2,007
	%	7.52	7.08	7.30	7.55	7.42	7.48
Employees between the ages of 30 and 50	n	6,636	5,548	12,184	7,173	6,135	13,308
	%	51.09	42.07	46.54	54.42	44.97	49.61
Employees over the age of 50	n	5,376	6,706	12,082	5,013	6,496	11,509
	%	41.39	50.85	46.16	38.03	47.61	42.91
Total employees	n	12,989	13,188	26,177	13,181	13,643	26,824

In this table, the percentage of employees by age group is calculated by comparing the number of employees belonging to each group to the total number of employees of the same gender.

In 2025, the 30-50 age group fell compared to 2024 for both genders (-537 women and -587 men). The group over 50 grew in numerical terms (+363 women and +210 men), while the population under 30 registered a slight overall decrease. In terms of gender composition, men remain numerically prevalent in the over-50 age group, while women are more represented in the 30-50 age group.

[66 b]: Percentage distribution of employees by age group - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Employees under 30 years old	%	3.73	3.57	7.30	3.71	3.77	7.48
Employees between the ages of 30 and 50	%	25.35	21.19	46.54	26.74	22.87	49.61
Employees over the age of 50	%	20.54	25.62	46.16	18.69	24.22	42.91

In this table, the percentage of employees by age group is calculated by comparing the number of employees belonging to each age group to the total number of employees in the Group.

In 2025, the share of the over-50 age group in total employees increased (from 42.91% to 46.16%), while the incidence of the 30-50 age group decreased (from 49.61% to 46.54%). The share of employees under 30 remains substantially stable. The percentage distribution confirms that the male component has a higher incidence in the over-50s, while the female component is relatively more concentrated in the 30-50s.

Disclosure Requirement S1-10 - Adequate Wages

[MDR-M, 77 a]; [69]; [70]

The TIM Group ensures that the remuneration conditions applied to its employees comply with national collective agreements and regulatory benchmarks in the countries in which it operates;

[70] Employees who do not receive wages in line with applicable benchmarks

	%
Italy	—
Brazil	—

The "Country" scope includes exclusively countries in which the Group employs at least 50 employees and which represent at least 10% of the Group's total employees. The "Italy" item includes TIM S.p.A., Telecom Italia Sparkle S.p.A., Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies S.r.l., QTI S.r.l. and Mindicity S.r.l.; in the "Brazil" entry, only TIM S.A. is considered

As can be seen from the table, all employees receive an adequate salary in line with their respective reference contracts, as illustrated in disclosure Obligation S1-8 "Coverage of collective bargaining and social dialogue".

Disclosure requirement S1-12 - Persons with disabilities

[MDR-M, 77 a]; [79]

The TIM Group measures the number of employees with disability in line with the legislation in force in the countries in which it operates.

For Italian companies, for the purposes of reporting, employees with disability are considered workers who fall into the categories referred to in Article 1 of Law no. 68 of March 12, 1999, which regulates the employment of people with disability and identifies the categories subject to recruitment obligations. This framework is part of the broader national regulatory framework, in which Legislative Decree 62/2024 defines the condition of disability as a lasting physical, mental, intellectual, neurodevelopmental, or sensory impairment that, in interaction with barriers of different kinds, can limit full and effective participation in social and working life.

In Brazil, federal law defines a person with a disability as an individual who has a permanent and irreversible impairment of a physical, hearing, visual, intellectual/mental, or multiple nature, or an infirmity recognized by the health welfare service. This condition, when interacting with one or more barriers, can hinder full and effective participation in society on an equal basis with others. The classification process as "PCD" (Pessoa com Deficiência) requires a formal medical evaluation. The competent health department examines the CID (Classificação Internacional de Doenças - International Classification of Diseases), a system used to classify diseases and health conditions, and verifies that the condition falls within the cases provided for by current legislation, ascertaining its permanence and irreversibility.

[79] Employees with disabilities - TIM Group

	UO M	2025	2024
Total employees	n	26,177	26,824
Employees with disabilities	n	1,028	995
	%	3.93	3.71

In 2025, there were 1,028 employees with disability, up from 995 in 2024. The incidence on the total workforce goes from 3.71% to 3.93%.

Disclosure requirement S1-13 - Training and skill development metrics

[MDR-M, 77 a]; [83 a, b]

The TIM Group promotes professional growth and skills development through structured performance appraisal and individual development planning processes, monitoring employee participation in periodic performance and career development reviews.

The "Other" and "Not disclosed" columns, required by the ESRS scheme with reference to unspecified or undeclared gender, are not shown in the tables as the related values are zero for all the exercises presented.

[83 a] Training and skills development by gender - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Employees that participated in regular performance and career development reviews	n	11,468	11,879	23,347	10,434	10,264	20,698
	%	43.81	45.38	89.19	38.90	38.26	77.16

The percentage of employees who participated in periodic performance and career development reviews is calculated as the ratio between the number of employees involved in the appraisal process and the total number of Group employees, in accordance with the disclosure requirement S1-6 "Characteristics of the undertaking's employees".

In 2025, the share of employees who participated in periodic performance and career development reviews stood at 89.19%, up from 12.03% in 2024. The increase concerns both gender components and reflects the strengthening and progressive extension of performance management processes within the Group.

[83 b] Hours of training by gender - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Total training hours	h	343,818.02	420,653.27	764,471.29	482,628.26	396,292.78	878,921.04
Average hours of training per employee	h	26.47	31.90	29.20	36.62	29.05	32.77

Average training hours per employee are calculated as the ratio of the total number of training hours delivered and completed in the reporting year to the total number of Group employees by gender as at December 31, 2025.

In 2025, total training hours recorded a 13% reduction compared to 2024. Average training hours per employee stood at 29.20 hours, down from 32.77 in the previous year.

The reduction is attributable to the revision of the training use model introduced during 2025, which has favored face-to-face courses and initiatives with high specialist content, with a greater qualitative focus and a growing focus on obtaining certifications.

Disclosure Requirement S1-14 - Health and Safety Metrics

[MDR-M, 77 a]; [88 a, b, c, d, e]

The TIM Group monitors the proportion of its own workers included in the occupational health and safety management system, which encompasses all the procedures, organizational responsibilities, and controls adopted to prevent accidents and protect health in the workplace.

[88 a] Workers covered by the health and safety management system - TIM Group

	UO M	2025			2024		
		Employees	Non-employees	Total	Employees	Non-employees	Total
Own workers covered by the health and safety management system	n	25,990	—	25,990	26,634	—	26,634
	%	99.29	—	99.29	99.29	—	99.29

The coverage of workers by the health and safety management system remains at 99.29%, in line with the previous year. The differential with respect to 100% reflects the presence of Sparkle personnel operating abroad, in different regulatory contexts.

[88 b] Fatalities from work-related injuries and illnesses - TIM Group

	UO M	2025				2024			
		Employees	Non-employees	Other workers	Total	Employees	Non-employees	Other workers	Total
Number of fatalities as a result of work-related injuries	n	0	—	—	0	0	—	—	0

In 2025, no fatalities were recorded due to work-related injuries or illnesses, in continuity with what was recorded in the previous financial year.

[88 c] Recordable Workplace Injuries - TIM Group

	UO M	2025			2024		
		Employees	Non-employees	Total	Employees	Non-employees	Total
Recordable work-related accidents	n	30	0	30	25	0	25
Percentage rate of recordable occupational injuries	%	0.78	0.00	0.78	0.60	—	0.60

The rate of recordable work-related accidents is calculated as the ratio between the number of occupational injuries that resulted in at least one day of absence and the total hours worked by the Group's own workers in the reporting year - equal to 38,468,566-, multiplied by 1,000,000.

In 2025, there were 30 recordable occupational injuries among own workers, compared to 25 in 2024. The injury rate increased from 0.60 to 0.78 per million hours worked, showing an increase compared to the previous year. The recorded events were minor and referable to different operational circumstances, including activities carried out in agile mode.

[88 d, e] Cases and days lost due to occupational injuries, accidents and deaths - TIM Group

	UO M	2025	2024
		Recordable cases of work-related illness	n
Work days lost due to injuries and fatalities resulting from work-related accidents and illnesses, and fatalities due to illnesses ¹	n	513	367

⁽¹⁾ Working days lost due to injury do not include absences resulting from commuting accidents, except in cases where the transport was organized by the Company, nor those attributable to passive accidents (i.e. events not directly connected to the performance of work activity). If an injury results in an absence that extends over two reporting years, the event is recorded in the year in which it occurs, while the related days of absence are accounted for in the year in which they are actually taken.

In 2025, 513 workdays were lost due to work-related accidents and fatalities, an increase of 39.8% compared to 2024. The increase is mainly attributable to the higher incidence of events with medium-long prognoses (equal to or greater than 20 days). There are also no recognized cases of occupational disease in the reporting period, in continuity with 2024.

Disclosure requirement S1-15 - Work-life balance metrics

[MDR-M, 77 a]; [93 a,b] [94]

The TIM Group monitors access to and use of leave for family reasons, in accordance with the legislation in force in the countries in which it operates, as an indicator of the balance between professional and private life and the effective use of the rights granted to employees.

The “Other” and “Not disclosed” columns, required by the ESRS scheme with reference to unspecified or undeclared gender, are not shown in the tables as the related values are zero for all the exercises presented.

The data reported refer to employees who, during the reporting year, took family-related leave at least once.

[93 a] Employees entitled to family-related leave - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Total employees	n	12,989	13,188	26,177	13,181	13,643	26,824
Employees entitled to take family-related leave	n	12,989	13,188	26,177	13,181	13,643	26,824
	%	100.00	100.00	100.00	100.00	100.00	100.00

[93 b] Employees who have taken family-related leave - TIM Group

	UO M	2025			2024		
		Women	Men	Total	Women	Men	Total
Total employees	n	12,989	13,188	26,177	13,181	13,643	26,824
Employees who have taken family leave	n	2,256	1,371	3,627	2,020	1,083	3,103
	%	17.37	10.40	13.86	15.33	7.94	11.57

In 2025, 3,627 employees took at least one leave for family reasons, equal to 13.86% of the total, an increase of 16.9% compared to 2024. The incidence remains higher among women (17.37%) than men (10.40%), although there was an increase in use for both components compared to the previous year. The trend highlights a widespread use of work-life balance tools, in line with the applicable regulatory and contractual framework.

Disclosure requirement S1-16 - Remuneration metrics (pay gap and total remuneration)

[MDR-M, 77 a]; [97 a, b, c]

The gender pay gap shows that, at Group level, the average annual pay of women is 24.49% lower than that of men (24.41% in 2024), showing a substantially stable trend. At the domestic level, the gap stands at 19.92% (19.8% in 2024).

In line with the indications of the ESRS, the gap is calculated as the percentage difference between the average annual remuneration of men and that of women, compared to the average annual remuneration of men (unadjusted gender pay gap). The figure is determined on an aggregate basis and includes all companies in the reporting perimeter, including TIM S.A.

The measure reflects the overall distribution of roles and grade levels within the Group and is influenced by the composition of the workforce. In particular, it affects the significant concentration of women in the customer care sector, where about 80% of customer care operators are women and where there is a greater presence of lower levels of management compared to other company functions, in line with the tasks performed.

Net of the customer care sector, the Group's pay gap stands at 18.47%, while at the Domestic level it is 14.26%, highlighting how the different organizational composition affects the overall figure.

TIM S.A., in its sustainability reporting, also finds a gender pay gap of 1.8%, determined according to a different methodology, based on the comparison between men and women who hold the same professional role and which takes into account the differences in pay between the different States and regions of the Federation. This value therefore represents an additional measurement, not directly comparable with the aggregate Group data calculated according to the ESRS.

At Group level, the ratio of the highest annual total remuneration to the median annual total remuneration of all employees is 90.20, an improvement from 92.86 in 2024. This means that the highest overall pay is about 90 times higher than the median staff pay, slightly narrowing the overall gap.

In calculating the ratio, both the fixed component and the variable component of remuneration are considered. For the variable part, the target value provided for by the incentive systems was assumed, as at the time of processing the final amounts were not

yet available. Non-monetary benefits (such as a company car for mixed use, life insurance and meal vouchers) are not included in the calculation, as they represent a residual portion of the total remuneration.

Variable remuneration affects the entire company population, through managerial, commercial and collective incentive systems.

The median value of remuneration at Group level was estimated using an algorithm that calculates the weighted average, based on the number of employees, of the median values of the individual group companies.

Disclosure Requirement S1-17 - Incidents, complaints and severe human rights impacts

[MDR-M, 77 a]; [103 a, b, c, d] [104 a, b]; [ESRS S2-4, 36]; [ESRS S3-4, 36]; [ESRS S4-4, 35]

During 2025, in the Domestic sector, TIM received several reports relating to human rights. This includes incidents attributable to forms of discrimination, broadly understood as any differential treatment, exclusion, limitation or situation of disadvantage formally detected by the company and referable to individual characteristics or conditions. This perimeter also includes any incidents of harassment, such as manifestations of unfair treatment; it is understood that not all reports relating to human rights necessarily constitute cases of discrimination.

- In 2024, TIM received a total of 43 reports regarding human rights through its whistleblowing channel, 30 of which related to incidents of discrimination or harassment and 13 related to other issues.

In 2025, there were 45 total reports, 43 of which related to incidents of discrimination, including harassment. As a result of the checks carried out, one report was substantiated, eleven were not substantiated, while thirty-one are currently the subject of further investigations.

The remaining two reports, although falling within the perimeter of human rights, were not classified as episodes of discrimination, as no differential treatments or situations of disadvantage based on individual characteristics or conditions emerged. Both are currently being explored.

In Brazil, in 2025, TIM S.A. received twelve reports on Human Rights, nine of which were attributable to alleged episodes of discrimination, including harassment. Of these, five were considered unfounded and four inconclusive due to insufficient evidence. Although no proven cases have been identified, the company has nevertheless adopted corrective measures, including awareness-raising and discussion with the parties involved, as well as disciplinary measures.

The remaining three reports, although falling within the scope of human rights, were not classified as episodes of discrimination. In particular, one report was considered well-founded, one partially well-founded and the third unfounded. In relation to the two reports found to be well-founded, specific corrective actions have been taken.

- In the field of information security, about 500 reports have been received through the dedicated channels. Of these, 39 were classified as incidents and therefore involved the formal takeover and structured management of the event. The remaining reports have given rise to preliminary assessment and investigation activities, without determining the opening of incidents, as they were considered not material or not attributable to cybersecurity events.
- In the field of privacy, in 2025 there were no data breaches to be notified regarding employees' personal data.

It should also be noted that none of the substantiated reports has been subject to sanctions or fines by external parties.

In continuity with what was recorded in 2024, also during 2025 the TIM Group did not register any serious incidents in the area of Human Rights related to its workforce, workers in the value chain, reference communities, customers, and end users.

Serious incidents are defined as events involving particularly significant violations of the fundamental rights of the person, such as, for example, forced labor, child labor, trafficking in human beings, or other violations of similar gravity. Such incidents are detected and reported regardless of the reporting channels used.

Workers in the value chain [ESRS S2]

Strategy

Disclosure Requirement SBM-2 - Interests and views of stakeholders

[S2 SBM-2, 9]

In defining its strategy and business model, the TIM Group takes into account the potential impacts on workers in the value chain, in particular in relation to the sustainability policies and requirements imposed on suppliers and partners. To this end, TIM promotes dialogue and the involvement of workers in the value chain through dedicated tools, including through the Open-es platform. The evidence collected is used to guide the evolution of sustainability policies and requirements applied to the supply chain.

Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

Perimeter of workers in the value chain

[S2 SBM-3 10 a, b]; [S2 SBM-3 11 a, i, ii, iii, iv ,v]

As part of the double materiality analysis, the TIM Group considered workers in the value chain potentially affected by its operations, taking into account the characteristics of the business model and business strategy. The Group operates through an articulated supply chain, which includes network operators, ICT service suppliers, manufacturing companies, and partners for outsourcing activities, located both in Italy and abroad.

The structure and methods of managing the value chain can have effects on working conditions, health and safety, and respect for the human rights of workers employed by suppliers, in particular in geographical contexts characterized by a higher risk of violations of fundamental rights. These effects are related to the complexity of the outsourced activities, the procurement methods, and the different regulatory and socio-economic conditions of the countries in which the suppliers operate.

The assessment of the social repercussions along the value chain supports the Group's strategic decisions and contributes to the management of operational and reputational risks related to the working conditions at suppliers.

Within the value chain, the workers upstream of the supply chain, that is, the employees of the suppliers who provide the TIM Group with products and services functional to the performance of core activities, are considered material. This category includes, by way of example, workers in companies that offer network services, telecommunications components and devices, as well as development and programming services. It also includes workers not belonging to the own workforce who work at the TIM Group's offices, such as workers of companies that provide technical assistance services and suppliers of professional services, such as consultancy service suppliers.

With reference to workers downstream of the value chain, those of companies that provide logistics services, distributors and dealers, as well as companies in charge of the construction and management of plants at customers, involved in the phases of distribution, installation and management of the services offered, are considered.

Finally, the workers involved in joint ventures are considered, which constitute a distinct category with respect to the activities upstream and downstream of the supply chain, as they operate within the framework of shared corporate structures and operating activities carried out jointly. By way of example, in Italy the TIM Group is involved in joint ventures with TIMFin S.p.A. and with the National Strategic Hub.

In addition to the groups of workers described above, no further relevant groups of workers have been identified in the value chain.

Impacts, risks and opportunities related to workers in the value chain

[S2 SBM-3 11 b, c, d, e]; [S2 SBM-3, 12, 13]

Following the double materiality analysis, a single significant negative impact emerged relating to workers in the value chain due to deficiencies in occupational health and safety, in particular related to inadequate safety measures, insufficient training, and the lack of personal protective equipment (IRO 15).

This identified negative impact is not generalized in nature, but is connected to the occurrence of a specific event found within the value chain.

On the other hand, the analysis did not show any positive impact.

The detail of the negative impact is reported in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

With reference to the material risks, a topic has been identified related to the potential failure to respect human rights along the Group's value chain (IRO 38). This risk can generate legal, economic-financial and reputational consequences, with possible effects on the operational continuity of the supply chain and on the Group's ability to preserve its position on the market.

In the risk identification process, the geographical contexts in which the workers in the value chain of the TIM Group operate were considered, with particular reference to areas characterized by greater exposure to ESG issues, including some areas of Asia, Central and South America, North Africa, and Eastern Europe. In such contexts, workers may be more exposed to significant risks related to respect for human rights and working conditions, including, but not limited to, child labor and forced or compulsory labor.

On the other hand, the analysis did not highlight material opportunities connected to workers in the value chain, as the monitoring of these issues is mainly oriented toward the prevention and mitigation of negative impacts and related risks for the Group.

The results of the double materiality analysis on workers in the value chain are used by the TIM Group to guide the management of relationships with suppliers. In particular, this information is considered in the qualification, evaluation, and monitoring of suppliers, with attention to respect for human rights and working conditions, in order to prevent and reduce potential negative impacts and risks regarding the workers involved.

The detail of the IROs is reported in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

Impact, risk, and opportunity management

Disclosure requirement S2-1 - Policies related to value chain workers

[16]; [MDR-P 65 a; b; c; d; e; f]; [17 a, b; 18; 19]

The double materiality analysis identified a negative impact (IRO 15) and a risk (IRO 38) related to the topic "Workers in the value chain." These IROs are monitored through the "Human Rights Policy", the "Purchasing of Products and Services Policy" and the "Health and Safety Policy".

The detail of the IROs is reported in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section, while for further information on the general aspects relating to policies, please refer to the "Policies - MDR-P" chapter in the same section. For the TIM Group's commitments to human rights, including the prevention of human trafficking, forced and child labor, and compliance with international labor standards, please refer to the TIM Group's "Human Rights Policy" illustrated in chapter MDR-P in the "General Information" section.

To define the Group's framework in the Brazilian context, TIM S.A. has defined specific policies aimed at guiding and managing the impacts on the value chain.

In particular, it has defined a policy on "Relations with Suppliers," aimed at guiding the management of relations with suppliers and subcontractors in compliance with human rights and dignified working conditions; a "Social Responsibility Policy", which formalizes the company's commitments to national and international standards and principles on human rights, responsible labor practices and integrity; a policy on Occupational Health and Safety, applicable to TIM facilities in Brazil and also relevant for the workers of suppliers, which establishes principles and guidelines for the protection of health, the prevention of accidents, and the continuous improvement of working conditions.

Disclosure Requirement S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

[31]; [MDR-A 68 a, b, c, d, e]; [MDR-A, 69 a, b, c, e]; [32 a, b, c, d; 33 a, b, c; 34 a; 35; 38]

In addition to the policies on "workers in the value chain", which provide the framework for the coherent and informed management of business activities, the TIM Group implements actions and resources related to the following topics:

- 1. Working conditions** including a) secure employment, b) health and safety.
- 2. Other work-related rights** that concern a) forced labor and child labor, b) data privacy in the value chain.

The actions are aimed at workers of Italian and foreign companies included in the social perimeter of sustainability reporting and, unless otherwise specified, are continuous and are repeated annually.

The actions described aim to prevent and mitigate negative impacts and to manage material risks for workers in the value chain, contributing overall to the oversight of human rights issues. For each action, where applicable, the purpose of the intervention is indicated, specifying whether it is aimed at mitigating negative impacts or managing risks.

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Working conditions

1a. Secure employment

■ Monitoring of employment conditions along the value chain

TIM requires its suppliers and contractors to comply with minimum standards regarding secure and fair working conditions, in line with the Code of Ethics and Conduct and the Human Rights Policy. The supply contracts include clauses that prohibit forced and child labor, require compliance with applicable legislation on working hours, pay, and non-discrimination, and protect freedom of association and the right to collective bargaining.

Compliance with these requirements is verified through initial qualification processes, periodic evaluations and, where appropriate, on-site audits and verifications, which may lead to the definition of improvement plans or, in the most serious cases, to the suspension or interruption of the contractual relationship. The effectiveness of these activities is monitored through internal

indicators relating to the coverage of assessments on suppliers, the results of the checks, and the cases of non-conformity found, which feed into the planning of corrective actions and the periodic review of the controls.

Overall, the action contributes to monitoring the risk that human rights violations, in the company and along the supply chain (such as forced labor, exploitation or failure to respect trade union rights), may generate legal consequences, reputational damage and operational impacts (IRO 38).

1b. Health and Safety

■ **Monitoring of health and safety requirements in the selection and management of suppliers**

All suppliers and contractors undergo a qualification process that includes the preliminary and periodic verification of compliance with occupational health and safety requirements, as a condition for operating on behalf of the Group. These requirements, defined in accordance with national and international reference standards, are formalized in the supply contracts and applicable to the activities carried out.

For activities and suppliers with higher risk profiles, enhanced checks are provided, which may include, where relevant, the presence of certified management systems, such as ISO 45001.

■ **Operational risk management and prevention measures along the value chain**

During the execution phase of the works, TIM manages the health and safety risks related to the activities carried out along the value chain, with reference to the operating environments, the methods of carrying out the activities, and the use of equipment and protective devices. The activities include direct observations, document analysis, occupational health and safety inspections and audits, aimed at identifying actual and potential risks and verifying the adequacy of the prevention and protection measures adopted.

These activities are complemented by the periodic monitoring of the health and safety conditions of the workers in the supply chain, carried out through annual campaigns, environmental surveys, and controls on physical, chemical, and biological agents, in accordance with current legislation on occupational medicine, in order to identify any operational criticalities and activate corrective actions and continuous improvement interventions.

In the TIM S.A. perimeter, risk management includes the identification of hazards and the assessment of risks related to activities, products and services throughout the operational life cycle, through observations, analyses, inspections and audits, with the support of health, safety and environmental professionals. For non-employee workers, health and safety management is carried out by the supplier companies in compliance with the applicable Brazilian legislation, including the requirements set forth by Regulatory Standard NR-01.

Overall, for TIM S.A. in 2025, the expenses detectable for risk management activities and prevention measures along the value chain amounted to €17.7 k (OpEx).

■ **Training, dialogue and field checks**

TIM carries out information and training activities, accompanied by moments of direct discussion and operational checks, aimed at suppliers and, where relevant, at workers employed along the supply chain. The initiatives are aimed at disseminating good practices, strengthening awareness of risks, and the correct application of prevention measures, including mandatory training activities planned for the performance of work in confined or suspected pollution environments. These initiatives are complemented by periodic checks at workplaces and construction sites, also carried out with the support of independent third parties, with the aim of evaluating the effective application of the measures adopted and promoting the continuous improvement of working conditions along the value chain.

The overall actions taken contribute to mitigating the negative impact caused by poor safety measures and insufficient training at the base of potential damage to the health of workers in the supply chain (IRO 15).

2. Other work-related rights

2a. forced labor, child labor

■ **Prohibition of forced and child labor along the supply chain**

The principles and requirements set out in the Group's Human Rights Policy are integrated into the supply chain management processes, through the definition of binding obligations for suppliers and partners. In particular, compliance with the prohibition of forced labor and child labor is required, as well as the prohibition of the employment of persons under the age of 18 in hazardous, unhealthy, or night-time work, in line with the United Nations Guidelines on Business and Human Rights and with European and international reference standards. As part of the measures adopted and the monitoring activities relating to the value chain, no risks of forced labor were detected.

In the TIM S.A. perimeter, the same requirements are applied in accordance with Brazilian labor legislation, which prohibits forced labor and child labor and regulates their control and sanction mechanisms.

■ **Qualification and selection of suppliers on ethical and social bases**

All suppliers undergo a qualification process that includes the verification of compliance with minimum ethical and social requirements, as a necessary condition for access to the Group supply chain. In particular, the qualification process involves formal adherence to the Group Code of Ethics and verification of the existence of organizational and procedural safeguards to prevent human rights violations, including forced labor and child labor. Failure to comply with these requirements constitutes an obstacle to qualification and subsequent contractualization.

In TIM S.A., the company selects suppliers by verifying their compliance with Brazilian labor legislation and consulting databases related to the fight against corruption and forced labor. Suppliers who do not meet these requirements or who present risks of child labor are excluded from the procurement process.

Overall, the expenses for the qualification and selection of suppliers on an ethical and social basis amount to €46 k (OpEx) for TIM S.A.

■ **ESG assessment of suppliers at risk during the qualification phase**

For suppliers identified with greater exposure to risk, based on criteria such as geographical area, product group, and economic relevance, an in-depth ESG assessment is carried out through a dedicated questionnaire. The assessment is aimed at identifying and grading potential human rights risks along the supply chain and requires, among other things, the presence of appropriate measures to prevent human rights violations, including the adoption of ethical and social management systems such as SA8000 certification or equivalent standards, as well as confidential procedures for reporting behavior that does not comply with the Code of Ethics. In 2025, approximately 35% of the 299 qualified suppliers were subjected to ESG assessment.

■ **Audits and controls on suppliers and the supply chain**

In 2025, 4 audits were carried out on suppliers at risk, conducted on-site or on-desk, also with the support of independent third parties and through collaborative sector initiatives such as the Joint Alliance for Corporate Social Responsibility (JAC), of which TIM is a founding member. The alliance, which promotes cooperation between companies in the ICT sector, and of which TIM is among the founding members, was created with the aim of improving the quality of audits and review practices. Audits cover areas such as child labor, forced labor, freedom of association, discrimination, disciplinary practices, working hours, wages, health and safety, environment and business ethics.

In the face of any critical issues arising from the audits and evaluation activities, corrective action plans and improvement measures are defined and monitored, in collaboration with suppliers, up to the adoption of more incisive interventions, including the change of supplier in cases of serious or unrectifiable violations.

In the TIM S.A. perimeter, verification and control activities on suppliers are carried out in accordance with Brazilian labor and human rights legislation; Suppliers who do not comply with labor legislation may not provide services or products to the company.

Overall, the expenses detectable for TIM S.p.A. from audits and controls on suppliers and the supply chain amount to €60 k (OpEx).

Overall, all actions contribute to mitigating the risks arising from human rights violations considered as a whole along the supply chain, which involve legal, reputational, and operational impacts (IRO 38).

2b. Data confidentiality in the value chain

TIM requires suppliers, partners and other third parties in its value chain who, in any capacity, process personal data or sensitive information on behalf of the Group, to adopt appropriate technical and organizational measures to ensure the confidentiality, integrity and availability of data, in line with the Group's privacy and information security governance model.

These requirements are formalized in data processing contracts and agreements, which provide for specific obligations regarding logical and physical security, including access controls, management of security incidents, activity tracking and limitation of data retention times, as well as confidentiality commitments for the personnel of the suppliers involved in the processing.

Compliance with these obligations is verified through due diligence processes and periodic evaluations of suppliers and, where necessary, through targeted assessments or audits, which may lead to the definition of corrective actions or, in the most serious cases, to the revision or termination of the contractual relationship.

The effectiveness of these safeguards is guaranteed within the Group's Internal Control and Risk Management System (SCIGR), which ensures the continuous monitoring of risks related to information security and personal data protection along the value chain.

Through these measures, TIM contributes to preventing the risk of human rights violations related to personal data processing in the value chain (IRO 38), reducing the likelihood of legal, reputational, and operational impacts.

With reference to Disclosure Obligation S2-4 "Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions" (MDR-A), the total expenses recorded amount for the Domestic BU to €60 k (OpEx) and for TIM S.A. to €63.7 k (OpEx).

Metrics and targets

Disclosure Requirement S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

[41]; [MDR-T, 81 b i, ii]

To monitor the effectiveness of policies and actions related to the impacts, risks and opportunities associated with workers in the value chain, TIM adopts structured control processes and performance indicators, in accordance with applicable legislation and industry best practices. In particular, the Group oversees the following topics:

- of health and safety, through the monitoring of compliance with company procedures and policies by suppliers, through qualification processes, audits and periodic checks, aimed at the prevention of accidents and the reduction of risks for workers involved in supply chain activities;
- of human rights, by monitoring the number and type of reports relating to potential violations involving workers in the value chain, using the channels provided by the Code of Ethics and company procedures, in order to promptly identify any critical issues and activate corrective actions.

Reference communities and territories [ESRS S3]

Strategy

Disclosure Requirement SBM-2 – Interests and views of stakeholders

[S3 SBM-2, 7]

In defining its business strategy, TIM takes into account the opinions, interests, and rights of the communities in the territories in which it operates, recognized as relevant stakeholders for the sustainable development of the Group.

The involvement of the territorial communities takes place through initiatives, projects and structured moments of discussion at the local level, aimed at gathering their needs and expectations. The information that emerges from these activities is used to guide the design, updating and improvement of initiatives aimed at communities. In Brazil, TIM S.A. preliminarily consults indigenous communities to identify their legitimate expectations before making investments in their areas.

Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Scope of the communities affected by the Group's activities

[S3 SBM-3, 8a, b]

In relation to the communities and territories in which it operates, the TIM Group has assessed the impacts, both actual and potential, the risks and opportunities connected to its business model and business strategy, considering the effects generated on the communities in terms of access to digital services and digital inclusion.

Network infrastructure and the provision of digital services can affect communities in the territories where the Group operates, in particular in relation to access to connectivity services, quality of life, and participation in economic and social life.

The assessment of the social repercussions on the communities supports the Group's strategic decisions and contributes to the management of operational and reputational profiles, as well as to the enhancement of opportunities related to the sustainable development of the territories, the reduction of the digital gap, and the strengthening of relations with the stakeholders present in the territories of operation.

The TIM Group has considered communities potentially affected by the impacts of its activities, including those connected to direct operations and the value chain, also through products, services, and business relationships. The communities considered include citizens, public bodies, local administrations and central institutions active in the territories in which the Group operates, mainly in Italy and Brazil.

Impacts, risks and opportunities for communities

[S3 SBM-3, 9 a i, ii, iii, iv; 9 b, c, d, 10, 11]

The double materiality analysis did not show any negative impacts or significant risks. Instead, a positive impact was identified, attributable to the promotion of digital inclusion thanks to access to digital services (IRO 19). This impact has a wide and transversal scope and is not limited to specific territorial contexts.

A material opportunity has also been identified (IRO 32), connected to the development of the territories and the involvement of stakeholders, through initiatives consistent with the company's business model which, as an infrastructure operator in telecommunications, interacts systematically with the territories in which it operates, generating shared economic and social benefits.

Interactions with communities take place both directly in the Group's operations and indirectly through the value chain and collaborations with suppliers and public entities.

The details of the identified impacts and opportunities are shown in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

Impact, risk, and opportunity management

Disclosure requirement S3-1 - Policies related to affected communities

[14]; [MDR-P 65 a, b, c, d, e, f]; [16 a, b]; [17]

The double materiality analysis identified two material IROs (IRO 19 and 32) connected to the topic "Communities and reference territories." These IROs are governed by the "Code of Ethics and Conduct" and the "Human Rights Policy".

The detail of the IROs is reported in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the General Information chapter, while for further information on the general aspects related to the policies, please refer to the "Policies - MDR-P" chapter in the same section.

In the Italian context, no significant impacts on indigenous peoples have been found. In the Brazilian context, TIM S.A. oversees the human rights of the communities concerned, including traditional communities, indigenous peoples, and Quilombola communities, through the Social Responsibility Policy that considers the expectations of the communities and prior consultation in the event of

interventions that affect their territories. Company policies are aligned with the United Nations Guiding Principles on Business and Human Rights and the main international reference standards.

In Italy, TIM adopts a structured approach to dialogue with the reference communities in relation to the impacts related to its activities. This approach is governed by the "Stakeholder Engagement Guidelines", which define the principles and guidelines for stakeholder engagement and ensure their integration into corporate governance processes.

In Brazil, TIM S.A. adopts a similar approach to dialogue and involvement of the reference communities, based on the principles defined in the "Engagement Policy", which establishes the general criteria for managing relations with local stakeholders.

Disclosure Requirement S3-4 - Actions on material impacts on affected communities and approaches to managing material risks and pursuing material opportunities for affected communities, as well as the effectiveness of such actions

[31]; [MDR-A, 68 a, b, c, e]; [MDR-A, 69 a, b]; [32 c, d; 38]

In addition to the policies regarding the "Affected Communities", which provide the framework for the coherent and informed management of business activities, the Group implements actions and resources related to the following topics:

- 1. Digital education and digital awareness** which includes: a) Digital education and media literacy; b) Digital training and orientation to future skills; c) Enhancement of cultural heritage, health and research; d) Social development and inclusion.
- 2. Development of the reference communities and territories** which includes: a) Social, digital and equal opportunities inclusion 2b). Cultural and educational inclusion.
- 3. Participation in ecosystems and sector initiatives** aimed at fostering industry dialogue and the exchange of experiences and expertise in the ICT sector and in the field of sustainability, with a view to promoting the development of digital ecosystems and generating indirect benefits for the relevant regions.

The actions, also carried out in collaboration with external parties and system networks, are continuous over time and are aimed, as appropriate, at enhancing opportunities and generating positive impacts for the communities of reference, contributing as a whole to the monitoring of human rights issues. For each initiative, where relevant, the purpose of the intervention is indicated, specifying the connection to the pursuit of the positive impacts and/or opportunities identified.

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Digital education and awareness

1a. Digital Education and Media Literacy

■ Italian Digital Media Observatory (IDMO)

Participation, for the second consecutive year, in the activities of IDMO, the Italian hub of the EDMO Consortium, aimed at combating online disinformation and promoting media literacy among young people. In 2025, TIM implemented the "Mind The Web" project, included in the protocol signed between IDMO and the Ministry of Education and Merit (MIM), which involved 46,000 students and over 750 teachers from about 350 schools in 250 municipalities. Thanks to the involvement of the Ministry of Foreign Affairs and International Cooperation (MAECI), the initiative also involved 1,000 students from Italian schools abroad (Ethiopia, Turkey, Morocco, France, USA, Peru, Venezuela, Romania, Greece and Iran). The video podcasts and webinars produced are available on the IDMO website and have exceeded 9,500 views. As part of the same protocol, TIM also delivered a webinar dedicated to students from 80 schools identified by the MIM.

■ Technology Digital Literacy

Participation, as a partner, in the project promoted by the Permanent Observatory of Young Publishers (OPGE, subsequently renamed Osservatorio for Independent Thinking in October 2025), aimed at female and male secondary school students. The initiative is aimed at developing the skills necessary for the correct, conscious and critical use of digital tools, with particular attention to online information, digital content and media.

■ Doubt and Debate

Joining the project promoted by the Observatory for Independent Thinking, which consists of an educational platform aimed at teachers and students of upper secondary schools. The initiative is aimed at developing critical thinking, civic sense, and the ability to analyze information through media literacy and tech literacy courses, in support of the conscious use of digital tools and information content.

■ TIMVISION Agenda 2030

Educational initiative aimed at children, developed through animated content - including "undercover pollution" and "Kuomi" - aimed at promoting environmental awareness and responsible behavior, in line with the issues of the 2030 Agenda. The initiative uses accessible and engaging language to promote early learning on issues of sustainability and environmental protection. In 2025, the project was launched in April on the occasion of Earth Day and was monitored in May, registering a share of 8%. The initiative is structured on a contract with a duration of 48 months and includes a promotion programmed over time.

In total, expenses incurred for digital education and media literacy initiatives amounted to €430k (OpEx) for TIM Domestic.

1b. Digital training and orientation to future skills

■ **42 ROMA Luiss**

TIM is a strategic partner of 42 ROMA Luiss, a free coding school inspired by the French model École 42. The program is based on a peer-to-peer and coopetition learning approach, without teachers. Started in 2021, the partnership involves TIM organizing workshops and internships for students, while LUISS promotes calls for ideas on topics of interest to the company.

■ **ITS Maria Gaetana Agnesi**

TIM is among the founding partners of the Maria Gaetana Agnesi Higher Technological Institute, with the goal of contributing to the training of new generations of digital professionals. The ITS, hosted at the TIM Academy in Rome, offers training courses aimed at young diploma holders in strategic areas such as Data Analysis and Artificial Intelligence.

■ **Career Day and company visit**

In 2025, TIM participated in the Career Days and Job Fairs of major Italian universities, with a focus on STEM events. It has also organized two company visits for STEM students from the Polytechnic of Turin and the Roman universities, at the Customer Innovation Center in OGR in Turin and at the Innovation Lab of Val Cannuta in Rome. The two occasions allowed the students to get in touch with TIM managers and professionals and take part in the demos of TIM Enterprise's innovative Smart land, XR and IOT solutions.

In total, expenses for digital training and future skills development amounted to €417k (OpEx) for TIM Domestic.

Both the actions related to education and digital training listed above contribute overall to pursuing the opportunities deriving from initiatives for the development of the territory in order to generate shared economic and social benefits to strengthen corporate reputation and attractiveness for investors (IRO 32).

2. Development of the communities and territories of reference

2a. Social, digital and equal opportunities inclusion

■ **Women Plus**

Program aimed at the empowerment and professional development of women, inside and outside the company. The initiative includes: moments of discussion with women's associations, schools and universities to encourage the meeting of talents and opportunities in the area; communication and awareness-raising projects aimed at countering gender stereotypes and promoting positive models.

■ **Podcast "Equality Can't Wait"**

Communication and awareness project on gender equality issues, part of the TIM Group's women empowerment initiatives. In 2024 and 2025, a total of 8 episodes were published (4 in 2024 and 4 in 2025), based on real stories, interviews and data, with the aim of spreading a culture of equality. The podcast was first launched within the company and then made available on the main podcasting platforms, recording 3,900 external views and 4,104 internal views as of December 31, 2025. The initiative was then enriched with the creation of a theatrical event inspired by the contents of one of the episodes, and with a cycle of live events open to the public organized by the ELLE Active forum.

■ **Includere per Crescere (Include to Grow)**

Project promoted by the ELIS Consortium, in which TIM participates as a partner company, aimed at promoting inclusion as a lever for economic and social growth. The initiative promotes the employment of people with fragility or specific needs, often excluded from traditional selection channels, and supports collaboration between companies and companies with a social impact operating in the territory. In 2025, TIM supported the project with a focus on the reintegration of women into the workforce, contributing to the communication activities on the web and social channels of the organizations involved.

■ **Generazione Talento**

Project promoted by the ELIS Consortium, in which TIM participates as a partner, aimed at enhancing senior staff and promoting intergenerational integration in work contexts. The initiative supports the dialogue between companies and institutions for the development of innovative models of management of the last stretch of working life, favoring policies and organizational practices aimed at the inclusion and transmission of skills. In 2025, TIM contributed to the dissemination of the project through its communication channels (social media, website, and company intranet).

■ **Global Inclusion 2025**

Event promoted by the Global Inclusion Foundation, in collaboration with Il Sole 24 Ore and Gruppo 24 ORE, in which TIM participates as a partner, with the aim of promoting a culture of inclusion in companies, institutions, and society. The initiative involves companies, academics, institutional representatives and third sector organizations in a discussion on strategies, policies and projects to support diversity, equity and inclusion.

■ **Pride**

Support to the main Pride events held in 2025, including Rome and Milan, dedicated to the promotion of the rights, dignity and inclusion of LGBTQIA+ people. The initiative involved the active participation of TIM employees, who paraded bringing the company's values and colors together with those of Pride, contributing to the spread of a culture of respect and non-discrimination.

■ **Accessibility Days**

Participation in the main Italian event dedicated to accessibility and digital inclusion for people with disability. In the 2025 edition, entitled "Il digitale che accoglie" (digital that welcomes), TIM contributed by sharing its best practices in the field of disability management and the design of inclusive digital solutions, also for the benefit of people with sensory or communication-related disability. The initiative is part of a business context in which the TIM Group enhances the skills of people with disability, favoring inclusive work environments and the development of accessible services for customers.

■ **Digitization of rural areas (TIM S.A)**

The project provides for the extension of connectivity in Brazilian rural areas in the States of Espírito Santo, Paraná, Rio de Janeiro, and Santa Catarina, guaranteeing connectivity services to public schools in the territories concerned, with monitoring of obligations by the National Telecommunications Authority (Anatel). The initiative also includes the development of coverage in agricultural areas, in support of productivity and agribusiness, with the aim of connecting 32 million hectares by 2026. In 2025, TIM S.A. covered 26.2 million hectares through 4G technology and 53.1 million hectares through NB IOT technology, with benefits for over 2.6 million people living in rural areas.

Overall, for social inclusion and equal opportunities activities in the Domestic area, €147 k (OpEx) was spent.

2b. Cultural and educational inclusion

■ **TIMVISION Inclusion**

Initiative aimed at promoting cultural and linguistic diversity through the "Favole ROM" cartoon, developed with the involvement of the Italian ROM and SINTI community and with the patronage of the UCRI. The content integrates words in Romani, a language spoken by Rom and Sinti, with the aim of promoting recognition, respect and cultural inclusion, contributing to the fight against stereotypes and marginalization from childhood. In 2025, the initiative, which registered a 6% share, is monitored annually on the occasion of the National Day of Rom and Sinti.

■ **TIMVISION Disability**

Awareness-raising initiative aimed at children, developed through educational content in which WILL and Handico illustrate twelve conditions and syndromes, including paraplegia, autism, blindness, deafness, and Down syndrome. The project aims to promote awareness, understanding and an inclusive language from childhood, contributing to the reduction of stigma and stereotypes. In 2025, the initiative was monitored with reference to the month of January and recorded a 1% share.

■ **TIMVISION Emotional and Sexual Education**

Training initiative that addresses in a guided and appropriate way the issues of affective and sexual education through the contents "Bees and Flowers" and "Sex Symbols", developed with the patronage of the international association Terres des Hommes. The project is aimed at supporting the conscious growth of the youngest, promoting knowledge, respect and prevention of discriminatory or violent behavior, respecting the sensitivity of the topics covered and the correct contextualization of content. In 2025, the initiative was made available on the occasion of the Day against Gender Violence; registering a 1% share.

■ **TIMVISION for Everyone:**

An education and support initiative dedicated to the health and well-being of children, developed through the "Croco Doc" cartoon, which addresses the most common diseases and how to manage them in a simple and accessible way. The project is carried out under the patronage of the non-profit organization "Un Sogno nel Cassetto" and is integrated with a concrete action to support the territory, which has provided for the donation of ten tablets to pediatric cancer hospitals. The initiative, which registered a 12% share, is cyclically proposed again to support educational initiatives.

Overall, Cultural inclusion, education and combating inequalities, €63 k (CapEx), was spent

2c. Enhancing cultural heritage, health and research - TIM Foundation

The TIM Foundation is the Group's body dedicated to promoting initiatives of social, cultural and scientific interest, through support for projects and organizations active in the fields of health, social inclusion, research and the enhancement of cultural heritage, in line with the Group's values and the needs of the reference communities.

In 2025, the Foundation's activities focused both on the management and continuation of initiatives already started, and on the launch of new calls, with effects destined to develop in the medium term.

On the first front, in the field of health and prevention, support continued to the School Project "Anlaidi Lazio meets Students", aimed at the prevention of HIV and AIDS and at promoting awareness of health issues among students of Secondary Schools in Lazio, through information and direct dialogue.

The activities related to social inclusion, culture and prevention of youth distress projects selected as part of calls promoted by the Foundation in previous years also continued. These initiatives, carried out by entities and institutions operating at the national level, concern the enhancement of cultural heritage, the fight against conditions of social fragility, and the prevention of the phenomenon of NEETs, contributing to the generation of positive and lasting social impacts.

In the same context is the Mausoleum of Augustus Project, for which the agreement with the Capitoline Superintendence was renewed, allowing the reopening of the restoration site and the continuation of the site enhancement activities. The initiative also includes the creation and publication on the TIMVISION platform of a documentary dedicated to the figure of Augustus and the recovery path of the monument.

On the second front, the Foundation launched new thematic calls in the fields of scientific research, social inclusion and health, allocating a total of around 1.5 million euros.

In particular, the Research Calls were launched, aimed at supporting high-impact scientific research projects; the Inclusion Calls, dedicated to initiatives to combat inequalities and support people in fragile conditions; and the Health Calls, focused on prevention, innovation in care models and improving the well-being of people and communities.

As a result of the selection process, six entities of excellence at the national level were awarded funding. The projects will have a duration of 24 months and the operational start is expected after the resolution of the Foundation's Board of Directors, with the aim of generating measurable and lasting social impacts over time.

2d. Social development and inclusion – TIM Institute

In the perimeter of TIM S.A. (Brazil), social development and inclusion initiatives are carried out through the TIM Institute and are aimed at the communities and territories of reference. Since its inception in 2013, the TIM Institute has supported more than 700,000 people in 500 cities across Brazil.

Among the active initiatives is the Bateria do Instituto TIM project, an inclusive music education program carried out in Rio de Janeiro and aimed at children, young people and adults, with and without disability. The initiative uses music as a tool for social inclusion and skills development, annually involving more than 50 participants, mainly young people with disability, through free courses and moments of public performance.

In the same context, Academic Working Capital is included, a support program for university students interested in transforming end-of-course work into entrepreneurial initiatives with a technological content. The program includes training, mentoring and financial support. Since 2015, it has supported 240 projects from 88 universities, contributing to the creation of 128 startups; in the most recent period it involved 95 students and facilitated the launch of 20 new initiatives.

To complete the actions, the TIM Institute promotes the Edital Fortalecendo Redes call, aimed at institutional strengthening and the development of social projects of the organizations belonging to the Gerando Falcões network, active in the fields of technology, culture, sport and education. The call provides for the loan of selected organizations and the structured monitoring of activities, with the aim of strengthening their capacity for intervention and the social impact on the territories involved.

The Group monitors and evaluates the effectiveness of the actions undertaken through quantitative and qualitative indicators specific to each initiative, including the number of beneficiaries reached, participation rates, content viewing shares and results achieved with respect to the objectives set. Monitoring is carried out periodically and the results are used to guide the continuous improvement of initiatives and verify their impact on the communities concerned.

Overall, all actions concerning the social development of the territories, the inclusion and cohesion of the communities, as well as the cultural, educational, and research enhancement contribute to pursuing the positive impact deriving from the introduction of initiatives aimed at social inclusion and active participation in the life of the community (IRO 19) and to pursuing the opportunities deriving from initiatives for the development of the territory with the aim of generating shared economic benefits and social benefits to strengthen corporate reputation and attractiveness for investors (IRO 32).

Overall, €28.5k (OpEx) was spent on Social Development and Inclusion activities within TIM S.A.

3. Participation in ecosystems and sector initiatives

The TIM Group actively contributes to industrial and institutional discussions on the main issues affecting the evolution of the telecommunications sector, including network regulation, cybersecurity, cloud and digital sovereignty, artificial intelligence, personal data protection, consumer protection, and environmental sustainability.

Participation in industry initiatives and thematic working groups enables the Group to share expertise, contribute to the definition of standards and best practices, and promote solutions aligned with technological and regulatory developments in the sector. This commitment is carried out at the national, European, and international levels.

At the domestic level, the Group is active in the main industry and telecommunications representative bodies:

- Within **Confindustria**, TIM participates in numerous technical groups, including those dedicated to digital transition and sustainability, contributing to discussions on digital infrastructure, cybersecurity, data centers, STEM skills, and energy efficiency. The CEO of TIM also serves as the Delegate for Digital Transition to the President of Confindustria and chairs the related Technical Group, which has promoted initiatives mapping connectivity demand in production areas to support national infrastructure enhancement.
- Within **Assotelecomunicazioni (Asstel)**, of which the CEO of TIM is President for the 2025–2027 term, the Group contributes to defining common industry positions on industrial, regulatory, and employment issues, including the renewal of the national collective bargaining agreement for telecommunications, sector industrial policy, the evolution of call centers, professional skills, and measures supporting the sustainability and competitiveness of the supply chain.

At the European and international level, TIM actively participates in the main industry associations and their working groups, contributing to the definition of common positions and the development of regulatory and technical guidelines consistent with the evolution of the telecommunications market:

- Within **GSMA**, the global association representing mobile operators, TIM participates in task forces dedicated to sustainability and the sector's climate transition. In particular, the Group contributes to the work of the Climate Action Task Force, collaborating on topics such as energy efficiency benchmarking, promotion of renewable energy, Scope 3 emissions calculation methodologies, and circular economy models applied to network equipment and mobile devices.
- Within **Connect Europe**, the association of major European telecommunications operators, TIM contributes to working groups on European policies regarding sustainability and sustainable finance, including alignment with the EU Taxonomy and reporting obligations. The Group participates in discussions on European legislative initiatives on energy efficiency, circular economy, and sector decarbonization, sharing operational experience and contributing to the development of common industry positions.

Alongside participation in telecommunications sector working groups, the Group also engages in multi-stakeholder initiatives promoting sustainability and corporate responsibility at the national and international level:

- TIM is a partner of the **Italian Alliance for Sustainable Development (ASviS)**, a network of over 300 organizations promoting the 17 Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda. In 2025, the Group took part in the Sustainable Development Festival, contributing to discussions on the role of digital technologies and innovation in reducing environmental impact and improving digital infrastructure efficiency.
- The TIM Group has been a member of the **United Nations Global Compact** since 2002 and is part of the Global Compact Network Italy, the national network promoting the integration of the ten Global Compact principles on human rights, labor standards, environmental protection, and anti-corruption into business activities. Through this participation, TIM contributes to

the activities and initiatives promoted by the Italian network on corporate responsibility and sustainability, in line with the objectives of the United Nations 2030 Agenda.

Activities related to participation in ecosystems and industry initiatives are linked to IRO 19 and 32, as they contribute to stakeholder dialogue and the development of initiatives benefiting local communities, generating shared value and strengthening the Group's positioning. Total expenses for these activities amounted to €64k (OpEx).

The total identifiable expenses for the actions described in the disclosure requirement S3-4 "Interventions on significant impacts on affected communities and approaches to manage significant risks and achieve significant opportunities for affected communities, as well as effectiveness of such actions" amount to €994k (OpEx) and €63k (CapEx) for the Domestic BU and €92.5k (OpEx) for TIM S.A.

Metrics and targets

S3-5 Targets related to managing relevant negative impacts, enhancing positive impacts, and managing relevant risks and opportunities

[41]; [MDR-T, 81 b i, ii]

To monitor the effectiveness of policies and actions related to impacts, risks and opportunities related to the communities concerned, TIM adopts structured monitoring processes, in accordance with applicable legislation and industry best practices, using performance indicators consistent with the main areas of intervention.

In particular, the Group notes:

- the number of initiatives carried out and the number of beneficiaries involved, as indicators of the effective capacity to reach the reference communities;
- the territorial extension and coverage of the initiatives, where applicable, as useful elements to evaluate the dissemination and accessibility of the interventions;
- the level of participation and the degree of satisfaction of the recipients, detected through feedback tools and satisfaction questionnaires, as qualitative indicators of the perceived effectiveness of the actions carried out.

Clients and end-users [ESRS S4]

Strategy

Disclosure Requirement SBM-2 – Interests and views of stakeholders

[S4 SBM-2, 8]

In defining its business strategy, TIM considers the interests, opinions, and rights of customers, as well as consumers and end users of the products and services offered, as they are directly affected by the effects of the Group's business model.

The feedback and active involvement of these parties, as well as the organizations that represent them in various capacities, are used to monitor the level of satisfaction and assess the response to new offers, projects, and initiatives, guiding the company's future actions.

Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Perimeter of customers and end users

[S4 SBM-3, 9 a, b, 10 a i, ii, iii, iv]

In relation to consumers and end-users, as part of the double materiality analysis, the TIM Group considered customers who purchase TIM products and services, as well as consumers and end-users who use those products and services. These subjects were included as they were directly affected by the effects of the Group's business model, based on the supply of telecommunications services and digital solutions, considering both direct operations and the value chain.

The analysis did not highlight significant risks to the health of consumers and end users related to the use of the Group's products and services; while potential negative impacts related to the protection of privacy and personal data protection have been identified, with respect to which the need arises to guarantee clear, accurate, and accessible information on products and services, as well as transparent business practices, in order to promote informed use and informed decisions. In this context, children have been identified as the most potentially vulnerable category of end-users.

Impacts, risks and opportunities related to customers and end users

[S4 SBM-3, 10 b,c, d]; [S4 SBM-3, 11, 12]

Two significant negative impacts emerged from the double materiality analysis. The first is related to the loss of sensitive data following vulnerabilities in computer systems (IRO 1) and is mainly associated with the occurrence of individual incidents; the second is connected to exposure to harmful content, the spread of misinformation and phenomena of social exclusion (IRO 12) and is considered to be generalized in nature, as it can potentially refer to a wide audience of consumers and end users.

Two positive impacts were also identified. The first is attributable to training activities on digital and online security, aimed in particular at the most vulnerable people and aimed at promoting safer use of the network (IRO 6). The second concerns the promotion of social inclusion and access to digital services, with the aim of encouraging greater participation of people in economic and social life (IRO 19).

Both impacts affect individuals, families, small and medium-sized enterprises and large companies, at the national and international level, and are connected both to access to digital products and digital services and to the information and training activities promoted by the Group on the responsible use of digital technology and online safety.

Six material risks and four material opportunities connected to customers and end users have also been identified, which derive from the Group's business model and the methods of providing telecommunications services and digital services. Risks and opportunities may vary between different groups of customers and end users depending on the level of awareness in the use of digital, socio-demographic conditions and the territorial context.

In particular, risks (IRO 16, 25, 26, 27, 33, and 34) tend to have a greater impact on potentially more vulnerable categories of customers and end users, such as minors, the elderly, and individuals with less awareness of digital risks, who may be more exposed to issues related to the protection of confidentiality, cybersecurity, interruptions or discontinuities of services, and the effects of uneven connectivity, even in the presence of unstable geopolitical contexts.

Furthermore, the analysis did not highlight significant risks to the health of consumers and end users related to the use of the Group's products and services. However, potential negative impacts related to the protection of privacy and personal data protection have been identified, with respect to which the need arises to guarantee clear, accurate, and accessible information on products and services, as well as transparent business practices, in order to promote informed use and informed decisions.

The opportunities (IRO 3, 10, 11 and 28), on the other hand, are generally referable to a wider audience of customers and end users and are connected to the dissemination of advanced digital technologies, the expansion of network coverage and the offer of innovative solutions, with potential benefits in terms of accessibility, quality of experience and digital inclusion, in particular in favor of the least served or included groups.

The details of all IROs are shown in the dedicated table of ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section.

Impact, risk, and opportunity management

Disclosure requirement S4-1 - Policies related to consumers and end users

[15]; [MDR-P, 65 a, b, c, d, e, f]; [16 a, b]; [17]

The double materiality analysis identified fourteen material IROs (1, 3, 6, 10, 11, 12, 16, 19, 25, 26, 27, 28, 33 and 34) related to the topic “Consumers and End Users”. These IROs are addressed within the “Human Rights Policy”, the “Code of Ethics and Conduct”, the “Information Security Policy”, the “System of rules for the application of personal data protection regulations”, the “Business Continuity Policy” and the “Services Charter”.

The detail of the IROs is reported in the table dedicated to ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the “General Information” section, while for further information on the general aspects related to policies, please refer to the “Policies - MDR-P” chapter in the same section.

To define the Group's framework in the Brazilian context, TIM S.A. has adopted specific additional policies aimed at overseeing the main impacts on consumers and end users.

In particular, TIM S.A. has defined a "Privacy Policy", which establishes the principles for the collection, use of customers personal data protection, in accordance with the General Law on the Protection of Personal Data (LGPD), and which provides, among other things, for the prohibition of the marketing of products and services to minors, as well as the strengthened protection of minors' personal data.

TIM S.A. has also adopted a "Cybersecurity Policy," which defines the general guidelines for the security of networks and telecommunications services and for the protection of critical infrastructures, in accordance with the applicable legislation, to safeguard against risks related to information security and the continuity of services and to manage any security incidents, including data breaches, to protect customers and end users.

Processes for engaging with consumers and end-users about impacts - Disclosure Requirement S4-2

[20 a, b, c, d]; [21]

The TIM Group adopts structured ways of listening to and engaging with customers and end users, directly or through the organizations that represent them, in order to gather their views on the current and potential effects of business activities and integrate them into decision-making and management processes, contributing to the continuous improvement of business strategies and the quality of the services offered.

The dialogue with the market is carried out through direct and indirect channels, consistent with the Group's relationship model with stakeholders.

Direct Involvement

Direct interaction with customers takes place through structured listening tools and specific business processes, aimed at collecting consumer and business evaluations. In 2025, the Group used, among others, the following tools:

- customer experience listening systems: continuous system for detecting customer perception throughout all phases of the customer journey, from acquisition to possible termination of the relationship, aimed at identifying opportunities for improvement. In 2025, over 3,000,000 pieces of customer feedback were collected. The system integrates market analysis on competitive positioning and the evolution of needs, segmentation activities, surveys on brand perception, and dedicated surveys on the occasion of the launch of new products or services;
- enterprise customer engagement: TIM adopts a structured approach of direct interaction with customers belonging to the Enterprise segment through digital factories dedicated to specific areas of offering and technological solutions (cloud, IoT, cybersecurity, Digital Identity), which foster personalized and ongoing relationships;
- double materiality analysis: as part of the process of identifying and assessing the impacts, risks and opportunities material to the Group, in 2025 approximately 3,000 customers were involved through dedicated surveys to collect their assessments of the effects of the company's activities on the environment and society;
- the effectiveness of customer engagement methods is monitored over time through periodic surveys conducted by independent third parties on the main touchpoints and key processes.

The surveys are based on certified metrics, such as the "customer satisfaction index (CSI)" and the "Net Promoter Score (NPS)", which allow us to measure the perceived quality of services and, respectively, the propensity of customers to recommend the Group.

In this context, the “Detractor” KPI is particularly important, as it represents the percentage of customers who give a score between 0 and 6 to the question on the recommendability of services (NPS).

In 2025, the value of Detractors stood at 15.74%, a significant improvement compared to 19.28% recorded in 2024, highlighting a strengthening of the Group's positive perception.

In line with the approach adopted at Group level, TIM S.A. also monitors the experience and satisfaction of its customers through continuous customer experience and Net Promoter Score (NPS) surveys, conducted through periodic interviews. The surveys cover both relational and transactional indicators, with reference to the mobile and Ultra Fiber segments.

In line with the model adopted at Group level, TIM S.A. also carries out structured customer involvement through continuous Customer Satisfaction (CSAT) and Net Promoter Score (NPS) detection systems. The surveys cover the main touchpoints of the relationship – service activation, customer assistance, digital channels and commercial network – and allow you to monitor in a timely manner the key moments of the customer journey, guiding interventions to improve the QoS and the overall experience.

Indirect involvement through representative organizations

TIM collaborates with consumer associations as part of a structured dialogue aimed at protecting customers' rights, improving the quality of services offered and promoting transparent information. The comparison also allows us to collect comments and opinions on the way in which the company operates in the proceedings or appeals adopted by the Authority.

Among the relevant interactions of 2025, the involvement of consumer associations in the sharing of strategies for expanding the offer in the energy sector, developed in collaboration with Poste Italiane, as part of the evolution of the initiative's governance model is noted.

The dialogue with the Associations is also carried out through the discussion on the mechanisms of extrajudicial dispute management (Alternative Dispute Resolution), with the aim of monitoring the overall trend and promoting the continuous improvement of processes.

As part of the dialogue with consumer Associations, TIM devotes particular attention to understanding the needs and demands of the most vulnerable categories of consumers, also through ongoing relationships with trade Associations committed to their protection. This comparison contributes to strengthening an approach based on equity, accessibility of services and the prevention of unfair or excessively aggressive business practices. In Brazil, TIM S.A. offers an accessible online space for people with visual, hearing and speech disabilities, following WCAG and W3C guidelines. Among the resources available, the Libras Center allows customers using Brazilian Sign Language to communicate via video call with a 24/7 specialized intermediary. Starting in 2022, the company will also offer a WCAG-compliant keyboard navigation experience.

Operational responsibility for the involvement and satisfaction of customers and end users, as well as the integration of related feedback, is attributed to the Group's main business lines, in particular the Chief Enterprise and Innovative Solutions Office and the Chief Consumer, Small & Medium and Mobile Wholesale Market Office, with the support of the Data Analytics, Artificial Intelligence & Customer Insight function, within the Chief Strategy, Business Development & Wholesale Office.

With regard to the double materiality analysis, the TIM Group's policies, commitments and strategies on stakeholder involvement are overseen at executive level by the Sustainability function within the Corporate Communication & Sustainability Department, under the supervision of the Sustainability Committee, which operates at the level of the Board of Directors.

As part of institutional initiatives and dialogue with consumer Associations, supervision is entrusted to the Customer Protection & Transparency function, within the Legal, Regulatory & Tax Department.

In Brazil, TIM S.A. integrates the indirect involvement of consumers through an ongoing dialogue with protection bodies and competent institutions, including through the analysis of requests and information registered with external bodies such as Procons, Consumidor.gov.br, the Special Civil Courts, and Anatel. These dialogues help to monitor over time the main needs and critical issues of customers and to guide actions to improve services. TIM S.A. has also established the TIM User Council, a comparison body that promotes dialogue between the company, customers and consumer protection associations. The Board promotes active participation in the provision of services and provides useful contributions to the continuous improvement of the customer experience.

Customer engagement is monitored through dedicated functions, in particular Business to Consumer and Customer Experience & Ombudsman. The latter is responsible for defining the strategy and governance of initiatives to improve the customer experience, as well as conducting market research, monitoring customer needs, and generating insights to support the adoption of best practices and a customer-oriented company culture.

Disclosure Requirement S4-3 - Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

[25 a, b, c, d]; [26]; [S4-1, 16 c]

TIM manages the negative impacts on customers and end users associated with its products and services through a complex system of policies, processes, and actions, supported by accessible and fair reporting channels. These channels allow the communication of concerns, complaints, or disputes, ensuring timely response and transparent management, with the adoption of appropriate corrective measures. The channels are cross-functional and suitable for intercepting a wide range of needs, including commercial and administrative reports.

Through these tools, situations can also be reported that are attributable to material IROs, including vulnerabilities of computer systems or security events that may result in the loss or compromise of personal data and information processed, as well as interruptions or disruptions that affect the accessibility, continuity, or quality of digital services.

The Group monitors the level of awareness and trust in reporting channels through customer feedback, collected through surveys and analysis of how channels are used. Information on reporting channels is made available on institutional and commercial websites. In general, customers are involved in satisfaction surveys in which they have the opportunity to provide feedback on the level of assistance received.

Channels for Consumer and Business customers

- **"Voice" channels for the management of commercial, administrative and technical needs**
 - Customer Service 187 (landline) and Customer Service 119 (mobile) for individuals and families;
 - Customer Service 191 for companies and professionals.

To improve service efficiency and the quality of interaction, voice channels are supported by virtual assistants based on artificial intelligence.

■ **“Display” channels to consult information about the line and perform dispositive operations**

- My TIM app for individuals and families;
- MyTIM Business app for professionals and businesses;
- MyTIM customer area, dedicated to individuals, families and businesses for commercial and technical assistance.

Digital channels are supported by Angie, a virtual assistant based on artificial intelligence, with the possibility of escalating to human operators for the most complex requests.

■ **Social media channels to provide support and responses to reports**

On social media channels (Facebook, Instagram, X, and LinkedIn), TIM has adopted artificial intelligence-based solutions to support customer care activities, improve the management of customer complaints, and monitor technical and administrative assistance processes. In particular, the following have been introduced:

- a sample-based statistical analysis tool of anonymized transcripts of conversations between customers and operators, to support the improvement of the quality of customer care and training;
- an interactive voicebot based on natural language, replacing the traditional IVR, for a more fluid and timely management of requests.

In Brazil, TIM S.A. provides the following specific channels: Meu TIM App; virtual assistant; social media; WhatsApp; online chat; Call Center: *144 and 1056 services; Meu TIM website. In addition, the Ombudsman's Office - which acts as a second-level customer service channel - provides assistance to customers who have already sought support through the multi-channel system and who have not been assisted within the established timeframe or have not had their request adequately met. The purpose of the Ombudsman's Office is to transform a regulatory obligation into an opportunity to internalize the voice of the customer, allowing the company to continuously improve, reduce service requests and increase customer satisfaction.

Channels for Enterprise customers

■ **Channels to manage technical reports, security incidents, and operational support requests**

For companies and public administrations, among others, the following are active:

- Sinfonia technical assistance: channel, managed through CNA – Symphony Technical Assistance, accessible via toll-free number 800.100.100 with authentication via dedicated PIN, for the management of operational and technical reports, verification of the status of the lines, and support on Symphony services (outsourcing offer).
- Telsy Security / SOC Toll-Free number (800 811 822): channel dedicated to managing cybersecurity incidents and requests for specialist support on security services, with authentication via PIN and coordination with the Security Operations Center (SOC) (cybersecurity offer);
- TuConTI portal: digital ticketing and operational support platform that allows the opening and monitoring of reports, the consultation of service levels (SLA), periodic reports, and contractual and technical documentation, ensuring the traceability of requests.

Reporting channel for ethical, regulatory and anti-corruption violations

As part of the monitoring of significant impacts on customers, including human rights, the Whistleblowing channel constitutes a formal tool for reporting ethical and regulatory violations. The channel is accessible to external parties who have relationships with the Group, including customers and end users, to report illicit or non-compliant behavior, such as unfair practices, corruption, discrimination, or other violations of rights. The channel does not replace the usual commercial assistance tools, but constitutes a protection tool against conduct that could have a significant impact on stakeholders. Reports can be made through a dedicated portal, which guarantees the confidentiality of the identity of the whistleblower and the people involved through the use of security protocols and encryption tools. The portal issues a Unique Identification Code, which allows the whistleblower to monitor the status of the report and to exchange further communications with the competent parties, even anonymously. In compliance with the applicable legislation, the privacy and freedom of the whistleblower, any form of retaliation as a result of the report made is expressly prohibited.

The reports are received and managed by the Supervisory Body of TIM or the Group companies concerned, with the support of the Audits Department for the performance of the investigative activities.

In addition to the dedicated portal, the whistleblowing channel also includes:

- a voice mail box, accessible via the toll-free number 800 664 411;
- the possibility of sending reports by ordinary mail to the Supervisory Body of TIM or the Group companies concerned, at their registered offices.

In Brazil, TIM S.A. provides a Whistleblower Channel active 24 hours a day, seven days a week, to report actions or behaviors related to corruption, fraud, conflict of interest, discrimination, moral harassment, sexual harassment, human rights violations or violations of the Consumer Defense Code, or any other behavior that does not comply with the legislation and Code of Ethics and Conduct of TIM. For further details, please refer to the information in paragraph S1-3 "Processes to remedy negative impacts and channels for own workers to raise concerns".

Channels for Joint Conciliation

As part of the reporting and dispute management channels made available to customers and end users, TIM ensures accessible, fair, and transparent tools for the resolution of complaints. In this context, the Company maintains a continuous dialogue with the main consumer associations adhering to the Joint Conciliation Protocol, including at national level, in order to ensure the correct application of the procedures.

The Protocol allows disputes to be settled through an Alternative Dispute Resolution (ADR) procedure, an alternative to recourse to the judicial authority. The procedure is managed by a Joint Committee composed of a conciliator appointed by TIM and a representative of the Consumer Association and takes place entirely online. The process is aimed at identifying a shared solution, offering a quick, free and effective method, with a binding outcome in the event of an agreement. The system currently allows the management of approximately 7,500 cases per year.

During 2025, joint conciliation and the management of complaints through Consumer Associations recorded an increase in overall volumes, in particular in the Consumer segment. A total of 9,058 cases were handled, an increase of 21% compared to 2024. The system shows a high level of effectiveness, with a percentage of positive agreements for the customer equal to 97%.

Cybersecurity reporting channels

To report cyber abuse and illicit use of the internet and digital assets, the Group has an Abuse Desk, accessible via the institutional website and dedicated forms. This channel allows customers and other external parties to report events such as phishing, spamming, cyber attacks, viruses, improper use of services, or other illicit behavior detected online, for evaluation and management by the relevant structures.

Privacy reporting channels

Customers and end consumers can submit requests regarding the exercise of privacy rights by contacting Customer Service (e.g. 187, 119, 191) or they can send requests regarding privacy issues directly to the DPO, by writing to dedicated email addresses.

Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

[30]; [MDR-A, 68 a, b, c, d, e]; [MDR-A, 69 a, b]; [31 a, b, c, d]; [32 a, b, c]; [33 a, b]; [34]; [37]

In addition to the policies on “Consumers and end users”, which provide the framework for the coherent and informed management of business activities, the Group also implements measures and resources related to the following issues:

- 1. Data protection and information security** which includes a) privacy and personal data protection; b) Information security and cybersecurity;
- 2. Continuity of services and infrastructure** which includes the ability to prevent, manage, and mitigate technological incidents and external factors that can compromise the security of infrastructure and the continuity of services;
- 3. Technological innovation and secure digital solutions** which includes the development and adoption of emerging technologies (AI, 5G, IoT, cloud and cybersecurity) and strategic partnerships to meet the needs of customers and businesses with secure, innovative, and reliable digital solutions;
- 4. Quality, accessibility and conscious use of services** which includes a) equitable and inclusive access to essential services; b) accessibility of digital content and digital services; c) digital experience security and child protection; d) digital education and conscious access to technologies.

The actions are aimed at the prevention and mitigation of actual and potential negative impacts, as well as the management of risks and opportunities material to consumers and end users. For each action, where applicable, the purpose of the intervention is indicated, specifying whether it is aimed at mitigating negative impacts and risks or at enhancing opportunities and positive impacts.

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Data protection and information security

1a. Privacy and personal data protection

For a detailed description of the implementation methods and the measures adopted regarding personal data protection, applicable to both employees and customers of TIM, please refer to Disclosure Obligation S1-4 "Interventions on material impacts for the workforce and approaches for the management of material risks and the pursuit of material opportunities in relation to the workforce, as well as the effectiveness of such actions", in the context of actions related to "Other work-related rights".

1b. Information Security and Cybersecurity

For a detailed description of the implementation methods and the measures adopted in terms of information security and cybersecurity applicable to both employees and customers of TIM, please refer to Disclosure Obligation S1-4 "Interventions on material impacts for the workforce and approaches for the management of material risks and the pursuit of material opportunities in relation to the workforce, as well as the effectiveness of such actions", as part of the actions related to "Other work-related rights".

2. Continuity of services and infrastructure

TIM protects customers and end users by ensuring the continuity and reliability of essential services through structured measures of infrastructural resilience and operational continuity, aimed at preventing, managing and mitigating the impacts deriving from adverse events, operational interruptions and external factors that may compromise the provision of services.

■ **Business Continuity System Certification (ISO 22301)**

TIM adopts a Business Continuity framework certified according to the international standard ISO 22301, integrated with the Group's technological and infrastructural assets. The certification attests to the adoption of a structured business continuity management system, aimed at the prevention, management, and restoration of critical activities in the event of incidents that may cause interruptions or degradation of the service.

The framework is aimed at ensuring the continuity of services for consumers and end users, ensuring the functioning of critical processes and the organization's ability to respond in crisis scenarios.

■ **Management of continuity risks and recovery plans**

The Business Continuity system adopted by TIM provides for the periodic updating of Business Impact Analysis (BIA) and Risk Assessment (RA) on critical processes, carried out on a recurring basis and updated annually, in order to identify intervention priorities and assess potential impacts deriving from adverse events or operational interruptions. Based on the analyses carried out, TIM defines, maintains and tests the continuity and recovery plans, ensuring the organization's responsiveness and the maintenance of essential service levels in favor of consumers and end users.

The effectiveness of the system is monitored through monthly progress of activities and an annual Management Review, aimed at comparing results achieved with initial planning and at defining any corrective actions.

For 2025, TIM has defined specific objectives to strengthen operational resilience, including the annual update of more than 65% of the Business Continuity Plans and the annual testing of more than 65% of them. Business continuity activities are supported by periodic testing of recovery strategies and training and awareness-raising initiatives, aimed at promoting a widespread culture of business continuity at all organizational levels.

The adoption of these safeguards makes it possible to minimize downtime in the event of adverse events, to ensure continuity of essential services and to respond effectively to the needs of consumers, authorities and partners.

In line with the Group's approach, TIM S.A. also carries out Business Impact Analysis (BIA) to identify critical activities and define recovery priorities, developing business continuity plans that provide for response strategies to scenarios of unavailability of people, systems, suppliers, and operational sites. A Crisis Management procedure is also in place to minimize the impact of adverse events.

Overall, the detectable OpEx associated with Business Continuity activities for 2025 for the Domestic BU is approximately €330 k.

All of the actions described contribute overall to mitigating business continuity risks arising from cyberattacks, system breaches and infrastructure sabotage (IRO 16), the failure to technologically transform legacy infrastructure and platforms (IRO 25), as well as unstable geopolitical contexts and global health crises (IRO 34).

3. Technological innovation and secure digital solutions

TIM develops and offers advanced technological solutions in the field of cybersecurity, cloud, IoT and Artificial Intelligence, aimed at people, companies and institutions, with the aim of supporting a safe, sustainable and inclusive digital transformation, mitigating the risks associated with the use of digital technologies and enhancing growth opportunities.

The solutions are developed through a dedicated organizational model, which includes the Group's digital factories, including Noovle for cloud, Olivetti for IoT and Telsy for Cybersecurity, ensuring a direct and personalized relationship with customers.

■ **Cybersecurity solutions and cyber risk management**

Cybersecurity solutions are aimed at companies and Public Administrations and cover the entire cyber risk management cycle, from prevention to detection, to response and recovery. Services include the protection of applications, digital services and infrastructure exposed on the Internet through traffic control, anomaly detection and vulnerability management, with the aim of reducing the risk of compromise of core platforms, cloud environments and critical systems.

Continuous security event monitoring services are provided (24/7), based on the collection and analysis of system (logs), which allow the early detection of intrusion attempts, suspicious activities and advanced cyber attacks (Advanced Persistent Threat – apt). (Cyber Incident Response - CIR) services are available for the management of major incidents, including technical analysis, containment and restoration of systems to ensure business continuity.

The offer also includes solutions for the protection of the availability of critical digital services, including distributed "denial of service" attack mitigation services (DDoS Protection as a Service). Cyber risk assessment and risk management tools are included, which allow organizations to analyze the level of exposure to cyber risks and plan adaptation interventions to applicable regulatory requirements.

These services support in particular companies subject to security and digital resilience obligations under the NIS2 Directive (Network and Information Security 2), the DORA Regulation (Digital Operational Resilience Act), and the Cyber Resilience Act of

the European Union, contributing to compliance with the provisions on risk management, business continuity, and protection of digital infrastructures.

The offer is completed by technical security verification activities, such as intrusion testing (Penetration Testing) and vulnerability assessment (Vulnerability Assessment), as well as training and awareness programs on cybersecurity issues (Security Awareness) aimed at technical and managerial personnel.

In 2025, the cybersecurity offering portfolio generated CapEx of €7.690 k and OpEx of €95.980 k.

■ **IoT solutions for resilience and intelligent land management**

The IoT solutions developed by TIM support the real-time monitoring of territories, infrastructures, plants and critical networks, helping to prevent and mitigate operational, environmental and safety risks that can compromise the continuity of activities and the quality of services. These solutions are applicable across companies and institutions, operating locally, nationally and internationally, and adapt to contexts characterized by high operational complexity and critical infrastructure.

Integration with next-generation networks such as 5G and optical fiber enables highly reliable applications, ensuring timely data transmission, high processing capacity, and secure interconnections between devices, systems, and infrastructures distributed throughout the territory.

IoT platforms allow you to anticipate and manage risk situations through advanced monitoring systems, predictive maintenance and infrastructure control, contributing to a more efficient management of resources and the reduction of energy and water waste.

On these platforms, TIM develops digital services in cloud SaaS mode integrated with Artificial Intelligence algorithms, in support of public administrations, which enable Smart City and Smart Land models as integrated approaches to the intelligent and secure management of the territory, infrastructure, and services.

Smart City solutions, such as "TIM Urban Genius", allow for the continuous analysis of parameters relevant to safety and collective well-being — including air quality, weather conditions, flows of people and vehicles, traffic, and use of urban spaces — supporting the timely identification of potentially critical situations and the planning of interventions based on the needs of the territories.

In the field of buildings and infrastructure, IoT solutions allow the detection and analysis of functional parameters of plants, helping to guarantee conditions of comfort, safety and continuity of services in environments frequented by citizens and workers.

Similarly, with reference to mobility, TIM offers digital solutions for fleet management and for optimizing the charging of electric vehicles in public transport, based on cloud platforms and connected devices. Data analysis allows to improve safety, reliability and regularity of the service, reducing the time of unavailability of vehicles and contributing to a more efficient mobility oriented to the needs of the community.

During 2025, TIM developed an overall plan of services and platforms to support the digital transition of the Public Administration, activating 68 projects at Entities and Municipalities, of which 23 were implemented thanks to the TIM Urban Genius solution.

■ **Cloud solutions for flexible and scalable delivery of digital services**

TIM's cloud solutions support companies and institutions in the safe and efficient management of data and digital services, helping to reduce operational risks and guarantee the integrity, availability, protection and confidentiality of information, as well as, where applicable, compliance with regulatory requirements regarding personal data protection (e.g. GDPR).

The integration of cloud platforms with digital identity services – such as PEC, digital signature, and SPID – makes it possible to simplify and make access to public and private services more secure, favoring the reliable use of digital services by citizens, users, and organizations. Cloud solutions also enable flexible and collaborative work models, supporting business continuity and the adoption of more inclusive and sustainable ways of working through digital collaboration and smart working tools.

Thanks to the integration with new generation networks, such as optical fiber and 5G, cloud solutions ensure high application performance, low latency and scalability, being particularly relevant for complex digital ecosystems in areas such as digital industry, health, education and intelligent infrastructure management. In this context, the cloud represents an enabling element for the provision of reliable digital services, aimed at the end user and able to adapt to distributed operational contexts. Cloud platforms are also used to support inclusive digitization initiatives in the educational field, through digital environments that favor collaboration between teachers and students, simplify the management of teaching processes, and guarantee high levels of security and accessibility, also for the benefit of people with disability.

Finally, the cloud constitutes the technological basis for the adoption of Artificial Intelligence and advanced data analysis solutions, allowing to improve the efficiency of processes, the quality of services, and interaction with customers and end users. In this context, the Group's approach is based on principles of responsibility, safety and ethics, in support of a reliable and sustainable digital transformation.

■ **Artificial Intelligence solutions for the continuity and quality of services**

TIM adopts Artificial Intelligence (AI) solutions both in internal processes and in services aimed at customers and end users, with the aim of strengthening the continuity, reliability, and quality of digital services and improving the overall user experience. The adoption of AI is accompanied by a responsible approach, based on principles of sustainability, transparency, and governance, in line with the latest European regulatory guidelines, including the AI Act.

From an environmental point of view, the Group's strategy considers the energy impact of AI systems and promotes solutions oriented towards Green AI, in order to mitigate the consumption associated with the development and use of the models, while ensuring the operational reliability of the systems supporting the services.

In 2025, the adoption of AI was strengthened along the main business processes that enable the delivery of services to customers, from customer care to marketing and support functions, with the aim of making processes more stable, consistent and scalable and reducing the risk of disruption.

In customer care, Artificial Intelligence is used to improve the continuity, reliability and quality of support for Consumer and Business customers. In particular, AI supports the statistical analysis of anonymized voice conversations, aimed at identifying recurring criticalities and opportunities for improvement of support processes, as well as the adoption of natural language-based conversational solutions that allow a more fluid, timely and consistent management of customer requests. These solutions also allow you to automate repetitive service activities, ensure 24/7 service availability and ensure greater consistency of responses across different contact channels, helping to reduce disruption and improve the overall customer experience. In Brazil, TIM S.A. adopts similar solutions based on voice and natural language to strengthen the accessibility and reliability of assistance services, in line with the Group's model and the local regulatory context.

In this context, TIM S.A. in Brazil adopts assistance solutions based on Artificial Intelligence, including voice response and natural language platforms, which allow customers to be guided along simpler, more accessible and reliable assistance paths, also through digital and physical channels. These applications help to strengthen the continuity and reliability of customer care services, in line with the Group model and the local regulatory context.

In marketing and proactive caring, predictive machine learning models support the anticipation of customer needs and the planning of targeted interventions, contributing to a more stable and continuous relationship with customers and to a reduction in ineffective or redundant interactions.

AI is also used to improve internal processes in support of services, such as document automation and generative productivity tools, with the aim of making the processes that enable the provision of services to the end customer more reliable and timely.

Finally, to promote the spread of Artificial Intelligence among Consumer customers, TIM has integrated services based on AI technologies into its offer, expanding access to innovative digital tools. In particular, TIM has made available a free one-year subscription to Perplexity Pro for its fixed and mobile customer base, as a service included in the offer and at no additional cost to customers. Since December 2025, TIM has also included Gemini Plus in the Google One 2TB offer, further strengthening the offer of advanced digital services.

All AI applications are accompanied by human supervision, which allows to validate the outputs, monitor the performance of the models and intervene in case of anomalies, ensuring over time reliability, control and continuity of the services offered to customers and end users.

All the actions described contribute overall to mitigating the negative impact resulting from vulnerability in IT systems that can cause loss of sensitive data and compromise of the privacy of customers and employees (IRO 1), as well as business continuity risks resulting from cyberattacks, system breaches and infrastructure sabotage (IRO 16), non-compliance with privacy laws and unauthorized access to personal data (IRO 26), and the increase in digital threats and cyberattacks (IRO 27), and contribute to seizing opportunities related to the development of strategic partnerships in cybersecurity and artificial intelligence (IRO 3), the adoption of advanced technologies to anticipate emerging customer needs and consolidate competitive advantage (IRO 10), as well as opportunities related to the circular economy and the reduction of resource waste through more efficient management of energy and materials (IRO 28).

4. Quality, accessibility and conscious use of services

4.a Equitable and inclusive access to essential services

In order to ensure fair and non-discriminatory access to digital services and telecommunication services, TIM promotes specific initiatives aimed at reducing economic and social barriers that can hinder the use of essential services. These actions are aimed in particular at low-income clients, the elderly and people with disability, helping to promote digital inclusion and full participation in social and economic life.

■ **Financial benefits for low-income customers (Universal Service)**

As the operator in charge of providing the Universal Service, TIM applies the economic benefits provided for by AgCom Resolution no. 258/18/CONS, aimed at customers who are in conditions of economic hardship, with the aim of guaranteeing access to basic communication services even to the most vulnerable population groups.

The benefits are granted to customers who hold TIM's VOICE offer and apply to the telephone service on the first home, on a traditional network (RTG). The initiative provides for a 50% reduction in the monthly fee, which is set at 9.44 euros per month (VAT included), as well as 30 minutes per month of free calls to national landlines and mobiles; once this threshold has been exceeded, calls are charged according to the pay-per-use prices provided for in the offer, with no call setup fee.

Customers with an ISEE of the household not exceeding 8,112.23 euros per year can access the facilitated conditions, helping to reduce economic barriers to access to essential communication services.

In line with the Authority's indications, TIM has also extended the benefits to the broadband Internet access service, providing for a 50% reduction in the monthly subscription price of the Alice 7 Mega broadband Internet offer. This measure strengthens the objective of combating the digital divide, favoring access to connectivity even for customers with lower economic availability.

■ **Financial benefits for customers with disability**

TIM takes specific measures to support customers with disability, with the aim of ensuring fair and appropriate access conditions to telecommunications services, in line with the applicable regulatory framework.

The benefits are aimed in particular at people with severe limitations of the ability to walk, total or partial blind people and deaf people. For fixed network services, TIM provides for a 50% reduction in the monthly fee for bundled offers that include telephony and data; for blind and deaf customers, there is also, as an alternative, a total reduction (100%) of the ADSL component activated on the RTG line, applied to the list price.

As of December 31, 2025, there were 20,331 fixed network lines that included benefits dedicated to customers with disability.

With regard to the mobile network, TIM provides offers specifically designed to meet the needs of customers with disability and their families. As of December 31, 2025, 12,200 mobile offers dedicated to these customers were active.

■ **Digital Identity Tools**

PEC (certified email), digital signature and SPID facilitate access to public, health and financial digital services, simplifying use for users with difficulties in providing physical documents or in-person identification, while at the same time ensuring greater personal data protection and security of online operations.

■ **TIM phones dedicated to accessibility**

TIM offers a range of TIM-branded corded and cordless phones designed to ensure a simple, intuitive and inclusive user experience, with special attention to the needs of people with disability and senior customers.

The devices integrate specific features to facilitate daily communication, including large numeric keys with sound feedback when pressed, clear and easily recognizable ringtones, incoming call light signaling, and a dedicated key for increasing the listening volume, in order to improve audio quality during the conversation and reduce barriers to accessing telecommunications services.

TIM strengthens its commitment to ensure the accessibility of digital products and digital services to all customers, including people with disability or with specific access needs, in line with the European Accessibility Act. The adjustment concerns the entire ecosystem of interaction with the end user, including websites, mobile applications and products equipped with computer interfaces, such as operating systems and Web user interfaces.

In collaboration with vendors and technology partners, TIM integrates solutions that comply with regulatory requirements and the principles of universal accessibility and inclusive design. Among the main actions are the introduction of QR codes highlighted on the packaging, which allow access to the digital Quick User Guide with voice interface, and the integration into the Web User Interface of tools dedicated to improving readability, navigation, and usability also for users with visual, motor, or cognitive disability.

4.b Accessibility of digital content and digital services

■ **Accessibility of audiovisual content for people with sensory disability**

TIM promotes the accessibility of audiovisual content through initiatives dedicated to people with hearing and visual disabilities, with the aim of reducing barriers to the use of digital services and promoting equitable access to information and educational content. In this context, TIM has developed two specific initiatives:

- **TIMVISION Speak in LIS:** initiative that makes audiovisual content for children accessible through cartoons with interpreters in Italian Sign Language (LIS), through dedicated activities of editing and adaptation of the contents in the TIMVISION catalog. The project is mainly aimed at children and families living with absence or spoken language disorder, in particular deaf people, and more generally at users with specific communication needs. The initiative helps reduce barriers to accessing audiovisual content and promote a more inclusive viewing experience. The project is developed under the patronage of the National Deaf Authority (ENS) and has been active for years, with periodic updating through the introduction of new "properties". The initiatives also generate a positive effect on the use of the standard versions of the same content.

In 2025, LIS products were licensed free of charge under commercial agreements.

- **TIMVISION Listen:** An initiative aimed at promoting the accessibility of audiovisual content for blind and visually impaired children, through the introduction of audio description in the cartoons available on the TIMVISION platform. Audio description allows you to describe scenes, settings, actions and relevant visual elements, allowing a complete understanding of the narrative content and a more autonomous use of the services.

The project includes dedicated content editing and adaptation activities and is aimed at filling a gap still present in the market, where audio description for content intended for children is overall less widespread than other accessibility features.

The initiative is carried out under the patronage of the Italian Union of the Blind and Visually Impaired (UCI) and has been active for years, with a continuous updating process through the renewal of the "properties" and the monitoring of the feedback also in terms of support for the standard versions of the same contents.

In 2025, the described audio products were licensed free of charge within existing commercial agreements.

In Brazil, TIM S.A. adopts initiatives aimed at ensuring the accessibility of services and information channels even for customers in conditions of greater vulnerability. In this context, it provides an accessible online space for people with visual, hearing, and speech disability, in accordance with the WCAG and W3C guidelines.

Among the available initiatives, the Libras Center allows customers who use Brazilian Sign Language to communicate, via video call, with a specialized intermediary available 24 hours a day, 7 days a week. Since 2022, a keyboard navigation experience compliant with accessibility standards has also been available.

4.c Digital experience security and child protection

TIM adopts specific measures aimed at protecting minors and ensuring safe and appropriate use of digital services, reducing exposure to inappropriate content and the main risks of cyberspace, in line with the applicable regulatory framework.

In this context, TIM provides secure browsing and parental control services that can be activated on fixed and mobile network connections, designed to protect minors while using the Internet. In particular, the Safe Browsing functionality is active by default, while the Parental Control is initially disabled and can be enabled by the customer. The solutions also help strengthen the protection of the digital experience against online threats, such as malware and phishing.

Parental control measures allow you to automatically block access to content that is not suitable for use by minors, including, but not limited to, categories such as adult content, gambling and betting, weapons, violence, hatred and discrimination, drugs, self-harm.

In addition, in compliance with AgCom Resolution no. 9/23/cons on systems for the protection of minors from the risks of cyberspace, TIM provides a free parental control service automatically applied to lines for minors. The service helps to ensure a safer and more age-consistent digital experience for users, strengthening the protection of minors when accessing electronic communications services.

TIM periodically provides the Authority with information on the performance of the lines in the name of minors; to date, about 130,000 lines subject to protection measures are active.

4.d Digital education and conscious access to technologies

■ **Ecosystems of innovation and dissemination of digital skills**

TIM promotes the dissemination of digital skills and the conscious use of technologies through participation in and development of open innovation ecosystems, aimed at students, startups, SMEs, social impact companies, and territorial stakeholders.

In this context, the company operates through the "TIM Innovation LABs" and the "Customer Innovation Center" at OGR Turin, which host open innovation, training, and technological experimentation activities. The spaces are dedicated to the organization of training events, workshops and networking initiatives open to schools, universities, startups and businesses, promoting the sharing of skills and access to emerging technologies.

TIM also participates in the "Impact Deal", a European acceleration program aimed at companies with a social and environmental impact that use data as a lever for growth. As a partner and member of the Data Club, TIM contributes to the journey by offering access to datasets, mentorship, and collaboration opportunities. The program, now in its fourth edition, has grown steadily; the current edition provides for the acceleration of about 30 companies selected out of 139 applications.

In this context, "Opening Future" is also included, a project launched in 2021 in collaboration with Google Cloud and Intesa Sanpaolo, aimed at accelerating digital transformation through the dissemination of skills on cloud, artificial intelligence, cybersecurity, and emerging technologies. The project also takes shape in the Opening Future Hub at OGR Turin, which hosts training courses for secondary school and university students, hackathons, programs for startups and initiatives dedicated to female entrepreneurship in the stem field.

In 2025, the supported initiatives involved over 3,000 students and teachers, 150 startups, and 350 SMEs, exceeding the cumulative targets envisaged in the first five years of activity.

■ **Immersive technologies and inclusive access to culture**

TIM contributes to the spread of digital inclusion and the enhancement of cultural heritage through the use of immersive technologies that make the cultural experience more accessible, interactive, and engaging for students, citizens, and visitors.

In 2025, TIM participated in the European project "Horizon Europe – TrialsNet", carrying out extended reality (XR) experiments at the National Museum of the Italian Risorgimento and the Pietro Micca Museum in Turin. Immersive experiences have included the use of virtual reality headsets and voice-assisted guides, allowing visitors to explore digitally reconstructed historical environments and enjoy cultural content in innovative ways.

The trials, carried out in March 2025, involved a total of over 150 participants, including students, teachers, guides, and visitors. Following the positive results, TIM, in collaboration with the Municipality of Turin and the museum directorates, has extended access to immersive experiences, with the aim of scaling up the model to other museum and cultural contexts on the national territory.

All the actions described have been identified as suitable and necessary to contribute overall to mitigate the negative impact deriving from the vulnerability in computer systems and the compromise of users' privacy (IRO 1), as well as the negative impact connected to the lack of interventions to promote a conscious use of digital, which can favor social exclusion and the spread of disinformation (IRO 12), and generate positive impacts on the spread of the responsible and conscious use of digital technologies (IRO 6) and on the active participation of people in the life of the community through accessible digital identity services and tools (IRO 19). The same actions also contribute to mitigating the risks associated with the increase in digital threats and cyber attacks (IRO 27) and the lack of high-speed connectivity and lack of digital inclusion (IRO 33), as well as the lack of technological transformation of legacy infrastructures and platforms (IRO 25), and contribute to seizing the opportunities linked to the development of strategic partnerships and innovative offers (IRO 3), the adoption of advanced technologies to consolidate competitive advantage (IRO 10), and customer loyalty through customized and accessible solutions (IRO 11).

In general, the Company evaluates the effectiveness of the actions undertaken through specific monitoring systems. The progress of the initiatives is periodically verified through performance indicators, internal control activities, and reporting processes that allow us to monitor the results achieved against the defined objectives and identify any corrective actions. Additionally, specific operational indicators are monitored, such as customer satisfaction levels and the number of security incidents that could impact customers.

Metrics and targets

Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

[MDR-T 81 a, b]

With reference to the digital growth targets, the previously adopted objectives are currently being updated as part of the definition of the new business plan. The new targets will be formalized and communicated during 2026, in line with the new strategic plan.

To monitor the effectiveness of policies and actions aimed at consumers and end users, the Group adopts an integrated system of performance indicators and control measures, in line with applicable legislation and industry best practices.

In particular, monitoring includes:

- security and data protection indicators, including the number of relevant security events (including any data breaches), incident handling times, and periodic checks on the effectiveness of cybersecurity safeguards;
- Service reliability and continuity indicators, such as the technical performance parameters of the infrastructures, the recovery times in the event of disruption, and the results of the testing and updating of the business continuity plans;
- customer experience quality indicators, including customer satisfaction levels (NPS, CSI), the number of complaints and average resolution times, as well as joint conciliations with consumer associations and any sanctions received from the sector authorities;
- indicators related to the accessibility and conscious use of digital services, such as participation in digital education initiatives and awareness-raising activities aimed at the most vulnerable.

The indicators are collected periodically and fall within the Group's governance and internal control safeguards, in support of risk monitoring and the continuous improvement of the quality and reliability of the services offered.

For further information on the results achieved with respect to the objectives of the previous plan related to customers and end users, please refer to ESRS 2 SBM-1 "Strategy, business model and value chain" in the "General Information" section.

4. GOVERNANCE DISCLOSURES

Business conduct and management of relations with suppliers [ESRS G1]

Impact, risk, and opportunity management

Disclosure Requirement G1-1 – Business conduct policies and corporate culture

Business Conduct Policies

[7]; [MDR-P, 65 a, b, c, d, e, f]; [9]; [10 a, c, e, g, h]

The double materiality analysis identified six material IROs (2, 4, 8, 14, 29, 34) related to the issue of business conduct. These IROs are overseen through an integrated governance and control system based on the code of ethics and conduct, the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, the Anti-Corruption Policy, the tax strategy, the Report on the Remuneration Policy and the remuneration paid, the Purchasing and Services Policy, and the Artificial Intelligence Guidelines. The detail of the IROs is reported in the table dedicated to ESRS 2 SBM-3 "Material impacts, risks, and opportunities and their interaction with the strategy and business model", in the "General Information" section, while for further information on the policies, please refer to the chapter "Policies - MDR-P" in the same section.

The issues related to business conduct fall within the responsibility of the Board of Directors, which exercises supervision within the Group's governance system, ensuring consistency with the principles of ethics, legality, transparency, and business integrity. For details, please refer to paragraph ESRS 2 GOV-1 "Role of administrative, management and control bodies". The main policies governing business conduct — including the Code of Ethics and Conduct, the 231 Model, the Anti-Corruption Policy, the Tax Strategy Policy, and the Remuneration Policy Report — are approved by resolution of the Board of Directors and are subject to periodic updating, also in light of regulatory developments and identified risks. Their dissemination is ensured through publication on institutional channels and on the company intranet, as well as through structured communication initiatives.

In terms of preventing and combating active and passive corruption, TIM S.p.A. and the main subsidiaries adopt an Anti-Corruption Management System compliant with the UNI ISO 37001 standard "Anti-bribery Management Systems", as a structured safeguard to protect company integrity. In Brazil, TIM S.A. operates in compliance with the Brazilian Anti-Corruption Law, adheres to the ten principles of the United Nations Global Compact and has adopted its own "Code of Ethics and Conduct" consistent with the Group's principles and the local regulatory context.

The Group adopts a risk-based approach to the identification and management of corruption risks, ensuring that the most exposed areas and roles are subject to specific controls. More details on the functions at risk and the related control controls are available in paragraph ESRS G1-3 "Prevention and detection of corruption and bribery".

The promotion of the culture of business conduct is supported by structured periodic training and information activities aimed at employees, intended to strengthen awareness of the principles of ethics, legality, and integrity. The main topics covered by the training include whistleblowing, anti-corruption, corporate governance, and the Code of Ethics. In 2025, an e-learning course on anti-corruption and ISO 37001 was held for the entire company population. Further information on the training program is available in paragraph ESRS G1-3 "Prevention and detection of corruption and bribery".

In Brazil, as part of the Integrity Program, TIM S.A. has implemented a structured training program on business conduct and integrity principles, aimed at top management and all employees, including awareness-raising initiatives also intended for third parties and business partners.

The Group also has a structured whistleblowing system on business conduct issues that allows reports to be made even anonymously, guaranteeing confidentiality and prohibiting retaliation. Dedicated procedures are provided for the management of reports and for the conduct of prompt, independent and objective investigations, including those relating to possible cases of corruption. For more details, please refer to the information reported in paragraph G1-3 "Prevention and detection of corruption and bribery" and S1-3 "Processes to remedy negative impacts and channels that allow own workers to raise concerns."

Actions relating to business conduct

[MDR-A 68 a, b, c, d, e]; [MDR-A, 69 a, b]

In addition to the policies on "business conduct", which provide the framework for the coherent and informed management of business activities, the Group implements actions and resources related to the following topics:

1. **Corporate culture** which includes a) corruption and bribery, b) protection and safeguarding of whistleblowers, and c) governance and responsible adoption of Artificial Intelligence;
2. **Management of relationships with suppliers** which includes payment practices.

The actions, applied in both Italy and Brazil, involve internal operations and the value chain and aim to ensure transparency and reduce risks related to anti-corruption and regulatory compliance. Where available, financial resources are also reported in terms of operating expenses (OpEx) and material capital expenses (CapEx).

In the description of the individual actions, unless otherwise indicated, the initiatives refer to the Domestic BU perimeter; while those expressly indicated as TIM S.A. refer to the Brazilian subsidiary.

The allocated financial resources are also reported, where available, with a distinction between operating expenses (OpEx) and capital expenditure (CapEx).

1. Corporate culture

1a. Corruption and bribery

■ **Anti-Corruption Management System (AMS)**

During 2025, TIM continued the implementation of the Anti-Corruption Management System (AMS) and the Integrity Program, through prevention, monitoring and continuous improvement activities aimed at mitigating the risks of active and passive corruption. The main actions implemented during the year concerned:

- the execution of anti-corruption risk assessment activities and the updating of the risk mapping and related controls;
- the performance of due diligence activities on roles and third parties exposed to risk;
- the monitoring of sensitive processes and the implementation of any corrective actions;
- maintenance and monitoring of ISO 37001 certifications for Group companies that are certified;
- the provision of training and information initiatives on anti-corruption and corporate integrity.

In Brazil, TIM S.A. continued the implementation of the Integrity Program, ensuring the monitoring of sensitive activities and compliance with local legislation on the prevention of corruption.

The financial resources used in 2025 for the implementation and maintenance of anti-corruption measures are equal to: TIM S.p.A.: €233.5 k (OpEx); TIM S.A.: €340 k (OpEx) and €96.2 k (CapEx).

These resources were mainly allocated to the maintenance of the Anti-Corruption Management System, surveillance checks for ISO 37001 certification, monitoring and control activities, as well as the development and updating of tools to support the prevention and management of corruption risks.

■ **Organization, Management and Control Model pursuant to Legislative Decree 231/2001**

TIM continued to update its Organization, Management and Control Model pursuant to Legislative Decree 231/2001 as a structured measure for the prevention of corporate crimes, including those relevant to corruption, regulatory compliance and cybersecurity.

In 2025, the Board of Directors approved version 7.5 of the Model, incorporating the main regulatory changes in the field of national cybersecurity and computer crimes (Law no. 90 of June 28, 2024), excise duties (Legislative Decree no. 141 of September 26, 2024), employment of irregular foreign nationals (Law no. 187 of December 9, 2024), as well as the amendments introduced by Law no. 114 of August 9, 2024 (so-called "Nordic Law") and Law no. 112 of August 8, 2024.

The Model is adopted by TIM S.p.A. as the parent company and by the main subsidiaries of the Group, covering all company functions and integrating with the internal control system and risk management system.

In 2025, for TIM S.p.A., the operating costs (OpEx) incurred for updating and managing the Model amounted to €52.4 k.

■ **Tax Control Framework**

TIM has adopted a Tax Control Framework (TCF), which is a structured system of governance and internal control of tax risks, aimed at their identification, management, and monitoring, as well as ensuring compliance with tax legislation and preventing irregularities or fraud with potential tax, reputational, and financial impacts.

Since 2017, the Company has been admitted to the Collaborative Compliance regime ("Cooperative Compliance") with the Revenue Agency. In this context, in line with the "Code of Conduct" provided for companies participating in the regime, TIM adopts a prudent and transparent approach in the interpretation of tax rules, maintaining a constant dialogue with the Financial Administration in order to prevent and resolve any interpretative uncertainties in advance.

The framework provides for internal monitoring processes aimed at ensuring the correct application of tax provisions and includes annual reporting to the Board of Directors and the Revenue Agency on the activities carried out and the discussions held. The system involves the financial and administrative functions, as well as all company structures that operate in tax-relevant processes.

■ **Awareness and operational supervision of tax risks**

The Tax Office function carries out continuous support and supervision of the company structures involved in tax-relevant processes, including financial ones, in order to ensure the correct application of tax legislation and prevent risks of non-compliance.

This activity is part of the Tax Control Framework and contributes to strengthening internal awareness of tax risks, promoting behavior consistent with the current regulatory framework and with the principles of transparency adopted by the Company.

1b. Protection and safeguarding of whistleblowers

During 2025, TIM S.p.A. and the subsidiaries included in the Domestic perimeter continued their activities aimed at promoting the protection of whistleblowers through information and training initiatives aimed at the entire company population, with particular attention to the functions most involved in the management of reports. The activities concerned the dissemination of the Whistleblowing Procedure, the methods of use of the reporting channels, and the protections provided for whistleblowers, including the prohibition of retaliation and confidentiality measures.

The regulation of the reporting system and its operating procedures is described in paragraphs S1-3 "Processes of involvement of own workforce and workers' representatives regarding the impacts" and S1-17 "Incidents, complaints and serious impacts in the area of human rights" of this document, to which reference is made. The Policy and information on how to manage and process reports are made available through the company portals, the intranet, and the website of the parent company and its subsidiaries.

1c. Governance and Responsible Adoption of Artificial Intelligence

During 2025, the TIM Group continued the implementation of the governance model for the responsible adoption of Artificial Intelligence, in order to ensure development consistent with ethical, regulatory, and sustainability principles and to mitigate the risks associated with uncontrolled or non-homogeneous use of AI technologies.

■ **Operational governance of Artificial Intelligence projects**

During 2025, the TIM Group consolidated the governance model for the responsible adoption of Artificial Intelligence through a Steering Committee dedicated to digital and technological issues. Steering ensures cross-functional coordination of programs involving the use of AI solutions, ensuring consistency with the Group's strategy, alignment with the Artificial Intelligence Guidelines, and monitoring of the risks associated with the adoption of emerging technologies. The Committee monitors the progress of projects, assesses potential reputational, regulatory, and operational impacts, and promotes the use of AI consistent with the principles of person-centeredness, transparency, data protection, and sustainability.

■ **Adoption of Artificial Intelligence Group Guidelines**

During 2025, the TIM Group implemented the Group's Artificial Intelligence Guidelines, progressively integrating their principles into the evaluation and development processes of AI projects in the main areas of activity (customer services, network, Operations and central functions).

The operational application of the Guidelines has been integrated into the internal control system and the governance mechanisms of digital projects, helping to mitigate the risk of adoptions inconsistent with ethical and regulatory principles and misalignment with the competitive and regulatory context.

■ **Participation in Responsible AI initiatives**

TIM participates in initiatives and working groups on Responsible AI promoted by industry associations, including the GSMA, in order to contribute to the definition of shared standards for the responsible use of AI in telecommunications and to promptly incorporate regulatory and technological developments, reducing the risk of falling behind the main evolutionary trends in the sector and strengthening its reputational positioning.

2. Management of relationships with suppliers, including payment practices

During 2025, TIM continued to implement structured practices for managing relations with suppliers, regulating differentiated standard payment terms for product groups in contracts and ensuring the monitoring of compliance with agreed deadlines. The contractual conditions generally provide for terms not exceeding 120 days from the date of issue of the invoice, conventionally set at the last day of the month, except for specific provisions contained in framework agreements or special clauses.

The Group also makes available to suppliers reverse factoring programs on a voluntary basis, which allow the anticipation of the collection of receivables through affiliated banking institutions or payment according to the natural contractual maturity. Any disputes relating to payment requests are handled through structured procedures of verification and comparison with suppliers, in order to ascertain the correct execution of contractual bonds.

The details of the average payment terms, financial programs and pending disputes are set out in the G1-6 disclosure obligation "Payment practices."

With reference to the Disclosure Requirement G1-1 – Business conduct policies and corporate culture (MDR-A), the total expenses recorded for the Domestic BU amounted to €285.9 k (OpEx) and for TIM S.A. to €340 k (OpEx) and €96.2 k (CapEx).

Disclosure Requirement G1-2 - Management of relationships with suppliers

The figures for the supply chain

[14]; [15 a, b]

In 2025, the TIM Group relied on a broad and diversified network of suppliers covering the main strategic spending categories, including network infrastructure, technological equipment, IT services, professional services, energy, and operational services. Overall, the Group carried out **123,635 purchase deeds for a value of more than 5.3 billion euros**, confirming the economic relevance of the supply chain within the company's operating model.

Below is a summary table showing the main figures of the supply chain - TIM Group:

Total Active Suppliers (Tier 1)⁽¹⁾

	UOM	2025
Group	no.	2,586
ITA	no.	1,937
BRA	no.	649

New Suppliers acquired in the year

	UOM	2025
Group	no.	267
ITA	no.	123
BRA	no.	144

Purchase deeds (for accrual in the year)

	UOM	2025
Group	no.	123,635
ITA	no.	12,737
BRA	no.	110,898

Value of purchases (ordered)⁽²⁾

	UOM	2025
Group	€ Mln	5,318
ITA	€ Mln	4,024
BRA	€ Mln	1,294

⁽¹⁾ Suppliers with an order and expected delivery within the year.

⁽²⁾ Purchases made by the Procurement Department for TIM S.p.A., Telecontact Center S.p.A., Telecom Italia Sparkle S.p.A., TI Sparkle Turkey, Olivetti S.p.A. and Noovle S.p.A.

Below is a summary table showing the main figure¹ of the supply chain - Domestic BU:

Composition of suppliers and purchase deeds

	UOM	2025	2024
Total Active Suppliers (Tier 1)⁽¹⁾	no.	1,937	1,844
of which significant ⁽²⁾	no.	566	745
New suppliers acquired in the year	no.	123	136
Purchase deeds (for accrual in the year)	no.	12,737	12,238
Value of purchases (ordered)⁽³⁾	€ Mln	4,024	4,043

Supplier Assessment

	UOM	2025	2024
Suppliers subject to desk and on-site assessment	no.	768	694
of which significant	%	39	39
Suppliers assessed with actual/potential negative impacts	no.	344	137

CONTINUOUS ESG ASSESSMENT OF SUPPLIERS

	UOM	2025	2024
Suppliers registered in the TIM Register uploaded to Open-es⁽⁴⁾	no.	4,527	4,039
of which registered on Open-es	no.	1,400	1,282
Active suppliers registered in the TIM Register	no.	1,937	1,844
of which registered on Open-es	no.	580	513

¹ The data refer to the portion of the Domestic BU perimeter managed by the Group Procurement Department and include purchases made for TIM S.p.A.; Telecontact Center S.p.A.; Telecom Italia Sparkle S.p.A.; TI Sparkle Turkey; Olivetti S.p.A. and Noovle S.p.A.

Supplier audits

UOM	2025	2024
Audits conducted by JAC⁽⁵⁾	no. 151	150
Audits conducted by TIM for the JAC	no. 4	11

⁽¹⁾ Suppliers with an order and expected delivery within the year.

⁽²⁾ Suppliers with orders \geq 500,000 euros or at sustainability risk with orders \geq 250,000 euros. Sustainability risk is related to the geographical context of origin, the sector, and the type of good/service provided.

⁽³⁾ Purchases made by the Procurement Department for TIM S.p.A., Telecontact Center S.p.A., Telecom Italia Sparkle S.p.A., TI Sparkle Turkey, Olivetti S.p.A. and Noovle S.p.A..

⁽⁴⁾ Collaborative digital platform that helps companies measure, improve, and share their sustainability performance (ESG).

⁽⁵⁾ Joint Alliance for CSR (JAC), an international initiative among telecommunications operators aimed at verifying the conditions of social responsibility at the production sites of the main suppliers in the sector.

At the end of the year, the active suppliers for the Domestic BU are 1,937, an increase of 5% compared to 2024, with a geographical distribution concentrated mainly in Italy and EU countries (95%) and 5% in non-EU countries. Spending is concentrated for about 54% on 20 large companies, and then distributed across a broader base of smaller suppliers.

In 2025 there was also an intensification of verification activities along the supply chain: Suppliers undergoing documentary or on-site evaluation increased by 11% compared to 2024. The checks include both the activities carried out during the qualification phase for registration in the Supplier Register, as well as the controls relating to suppliers registered on the Open-es platform and those subject to audits under the JAC initiative.

The strengthening of ESG monitoring measures has led to an increase in the number of suppliers for which actual or potential negative impacts have been detected (344 in 2025 compared to 137 in 2024). This increase is mainly due to the extension and greater systematic nature of control activities and has led to the activation of specific improvement plans, in line with the Group's due diligence approach.

The ESG approach in the supply chain

The TIM Group promotes a structured and integrated approach to sustainability along the supply chain, with the aim of preventing and mitigating negative environmental, social and governance impacts and contributing to the achievement of the TIM Group's climate and social targets, including Scope 3 emissions associated with the goods and services purchased. In this context, TIM integrates ESG criteria into procurement processes to promote the active involvement of suppliers on environmental and social issues and to encourage the continuous improvement of their related performance.

The TIM Group's "Product and Service Purchasing Policy" defines the principles and rules that govern the procurement process, integrating ESG criteria in all phases of the life cycle of the relationship with the supplier.

The Policy also governs payment mechanisms, which occur exclusively following the completion of the provision or delivery of the goods/services. Each user company function records the receipt of goods in the SAP system with reference to the purchase order, which formalizes acceptance of the supply and authorizes the issuance of the invoice, which is subsequently verified by the Accounting Operations Function of the Chief Financial Office before initiating the payment process according to the contractual timeframes.

To ensure the continuity of the supply chain, TIM adopts supply diversification measures, continuous monitoring of suppliers, audits and emergency plans, business continuity procedures, responsible purchasing practices, and dedicated training programs. The Company also encourages suppliers to take a proactive sustainable approach and to continuously improve ESG performance.

The Group also promotes solutions that allow reductions in greenhouse gas emissions in the supply chain, aimed at mitigating indirect emissions associated with the goods and services purchased. In parallel, it collaborates with suppliers and partners to reduce the risk of security incidents in the activities carried out, with the aim of progressively reducing their incidence, and promotes fair and non-discriminatory work practices along the entire value chain.

In terms of human rights, the Group promotes respect for fundamental principles along the entire value chain, requiring suppliers to act in a manner consistent with the "Code of Ethics" and the "Human Rights Policy". TIM promotes fair and non-discriminatory work practices and promotes adequate health and safety conditions along the supply chain.

Compliance with these principles is monitored through audits at relevant suppliers, with particular attention to geographical contexts characterized by significant socio-environmental risk. The Group also guarantees the availability of confidential reporting mechanisms, extending access to suppliers to the whistleblowing channels provided for by the Code of Ethics, as tools for the prevention and management of any non-compliant behavior.

In line with the principles defined by the Policy, the integration of ESG criteria takes place systematically throughout all phases of the procurement process:

■ Pre-contractual qualification

TIM adopts a risk-based approach aimed at identifying and monitoring the suppliers most exposed to ESG risks, ensuring that access to and maintenance in the Supplier Register are subject to the verification of economic-financial, technical-organizational, and sustainability requirements.

In the Domestic sector, suppliers are considered at ESG risk when they operate in geographical areas characterised by a high level of socio-environmental risk – such as Asia, Central and South America, North Africa and Eastern Europe – and have an order volume equal to or greater than 250 thousand euros; More generally, all suppliers with an order equal to or greater than 500 thousand euros fall within this perimeter, regardless of the geographical area.

For these suppliers, the completion of a structured ESG questionnaire is required, consisting of more than 30 questions related to environmental, social, and governance aspects, as well as the verification of the possession of specific certifications, including: SA8000 or equivalent standards in terms of social responsibility; ISO 45001 for occupational health and safety; ISO 37001 for the prevention of corruption; ISO 30415 on Diversity & Inclusion. Access and maintenance in the Suppliers Register are subject to exceeding a minimum compliance threshold of 40% of the positive responses to the questionnaire, which is binding for the purposes of qualification.

In 2025, within the Domestic area, approximately 300 suppliers were qualified and over 35% were subjected to socio-environmental assessment. 100% of the new qualified suppliers have signed the code of ethics and conduct, also on behalf of subcontractors and collaborators. In Brazil, TIM S.A. applies an integrated socio-environmental qualification process: In 2025, 354 suppliers were evaluated, of which 251 were approved and 103 were excluded during the qualification phase.

■ **Tenders and negotiations**

The ESG aspects are integrated, depending on the type of purchase and the relevance of the impact, in the "sustainability envelope," which can be assigned a weight of up to 10% in the overall evaluation of the offer. The envelope is based on a checklist consisting of a maximum of 30 environmental parameters, applied, where relevant, to the products and services under tender, with the aim of guiding procurement choices toward solutions with a lower environmental impact. In 2025, approximately 40 sustainability envelopes were used.

■ **Execution of the contract**

Periodic checks are carried out to ascertain the compliance of suppliers with the ESG commitments undertaken, with particular attention to environmental performance. The results of the checks are incorporated into the Vendor Rating index and may lead to the rescheduling of orders, limitations on participation in tenders, a review of the qualification process, the application of corrective contractual measures and, where necessary, the activation of specific improvement plans (Corrective Action Plans - CAPs).

In 2025, in the Domestic BU, 768 suppliers were subjected to second-party audits, with checks on environmental requirements and occupational health and safety; in the presence of non-compliance, Zip codes were defined with agreed deadlines, confirming the structured approach to monitoring and continuous improvement adopted by the Group.

TIM S.A. also carries out second party audits on a sample basis. In 2025, 26 suppliers were subjected to audits with checks on environmental requirements and occupational health and safety; for cases of non-compliance, specific action plans have been defined, confirming the Group's commitment to continuous improvement, risk mitigation and regulatory compliance.

■ **Monitoring and evaluation of ESG performance**

The monitoring of suppliers' ESG performance is supported by the Open-es alliance, of which TIM has been a value chain partner since 2022. Through the platform developed as part of the initiative, the ESG performance of suppliers is assessed, with the aim of increasing transparency, strengthening oversight of environmental issues, and promoting continuous improvement along the supply chain.

The platform also allows for training activities, sharing best practices, and promoting structured moments of discussion with business partners. As of December 31, 2025, TIM suppliers profiled on the platform are over 1,400, with an increase of 8% compared to 2024, higher than the annual growth target for enrollments set at 5%. Suppliers are also involved through dedicated ESG workshops and seminars (OpEx €143 k).

TIM also participates in the Joint Alliance for CSR (JAC), an international initiative among telecommunications operators aimed at verifying the conditions of social responsibility at the production sites of the main suppliers in the sector. In 2025, through the JAC, 151 audits were conducted that detected a total of 794 non-conformities; TIM also directly carried out 4 on-site audits (OpEx €60 k).

In the presence of findings, corrective action plans (CAPs) are defined and monitored over time until their closure, according to timelines agreed with the suppliers.

With reference to the G1-2 "Management of relationships with suppliers" disclosure obligation, the total expenses recorded amount to €203 k (OpEx) for the Domestic BU.

Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery

[18 a,b,c]; [20]; [21 a,b,c]

In implementation of the business conduct guidelines, the TIM Group has adopted a structured system for the prevention, identification and management of risks of active and passive corruption, based on an integrated set of organizational, procedural and control tools.

To prevent, identify and manage corruption risks, TIM S.p.A. has adopted an Anti-Corruption Management System (AMS) compliant with the UNI ISO 37001:2016 standard, applicable to the Company, members of corporate bodies, employees and collaborators. The certification, obtained in 2019, was reconfirmed following the annual surveillance audits with a positive outcome until 2028. Subsidiaries are required to adopt the AMS or equivalent controls in proportion to the risks to which they are exposed. In addition, the following are certified according to the ISO 37001 standard, TIM S.A. (March 15, 2021), Olivetti S.p.A. (May 11, 2022), TI Trust Technologies S.r.l. (June 6, 2022), Telecontact Center S.p.A. (July 21, 2022) and Telecom Italia Sparkle S.p.A. (December 15, 2023).

The Group Anti-Corruption Policy is an integral part of the AMS and defines the framework and rules of conduct for the prevention of corruption. TIM annually defines a System verification and monitoring plan, which is submitted to evaluation by the external Certification Body for the purpose of maintaining certification.

The System is based on a structured anti-corruption risk assessment process that identifies and evaluates the main corruption risks and the controls implemented to mitigate them. The analysis considers factors such as the location and sectors of activity, the nature and complexity of the operations, the third parties involved and the relationships entered into. This identifies the

foreseeable risks of corruption, maps the processes at risk, documents the methodologies used, and assesses the adequacy and effectiveness of existing controls, updating the assessment both periodically and in the event of significant changes.

To identify the functions, roles and relationships most exposed to the risk of corruption, a risk-based approach is adopted. In particular, the "Personnel in a Significant Position" are identified, i.e. figures who, due to their role or responsibility, have relationships with third parties, including public or private counterparties other than natural persons as customers or end users of TIM products and services. These include first level function managers, second level managers holding corporate power of attorney, and third and fourth level managers with formalized responsibilities in the organization chart and holding power of attorney, also identified on the basis of the results of internal due diligence activities.

The main business areas at risk of corruption are also considered, including procurement, investments, annual report, sales, logistics, human resources, finance and taxation, as well as the area of control and governance, with particular reference to the management of gifts and representation expenses, sponsorships and donations, relations with institutions and authorities, authorizations and concessions, legal and arbitration proceedings, health and safety at work, environmental protection and senior management operations.

The risk-based approach finally considers the potentially exposed third parties. In this context, the "Significant Relationships" are distinguished, depending on the nature of the relationship (public bodies, customers, suppliers, and private bodies), and the "Significant Third Parties", identified on the basis of the characteristics of the counterparty and the level of exposure to risk. These include beneficiaries of sponsorships or contributions, consultants, brokers, business partners, external collaborators, suppliers of goods and services, counterparties in extraordinary transactions, partners in joint ventures, and candidates for recruitment, also assessed from the point of view of reputation and potential conflicts of interest.

To support the monitoring of relations with third parties, the Company has implemented an IT system dedicated to the risk assessment of Third Parties, operational for suppliers and business partners of the indirect sales network, through Anti-Corruption due diligence activities. The Control and Risk Committee is involved in the process of identifying and assessing risks, including those of corruption, as well as in the continuous monitoring of the related mitigation measures, also exercising a supervisory role on the adequacy and overall effectiveness of the System in conjunction with the Board of Directors.

Following the identification and assessment of risks, the Anti-Corruption Management System is implemented through control and monitoring measures, reporting and evidence management mechanisms, structured reporting flows to governance bodies, and dissemination and training initiatives aimed at employees and third parties.

Reports relating to possible cases of active or passive corruption are received by the TIM Supervisory Body or by the Supervisory Body of the group company concerned. The Supervisory Body, with the support of the Audit Function, carries out the investigative activities operating in a position of independence with respect to the management of the areas under audits. At the end of the investigation, the Audits Department informs the Supervisory Body of the results of the checks and, where elements of suspected fraud with potential impacts in the area of anti-corruption emerge, it also notifies the Compliance Department. If critical issues are detected, the management of the areas or processes concerned defines a plan of corrective actions, ensures its implementation within the established time frame, and communicates the progress to the Audits Department. The Supervisory Body monitors its effective implementation.

In parallel, the supervision of the System is supported by periodic reporting and supervision flows. The Compliance Department periodically provides the Control and Risk Committee with information reports on the activities carried out in the field of corruption prevention; with reference to the EMS, these reports include the results of monitoring and control activities, the results of the integrity risk assessment, updates on improvements and non-conformities identified, as well as information deriving from due diligence processes. The CRC examines over time the adequacy and effectiveness of the System on the basis of the information received and reports annually to the Board of Directors on its assessments.

As part of the AMS, TIM SpA has adopted specific preventive measures aimed at strengthening control over the roles most exposed to the risk of corruption and promoting the dissemination of the culture of integrity through structured due diligence, training, and communication activities.

In particular, the Anti-Corruption Policy provides for due diligence checks to be carried out on resources that hold or are intended to hold "Significant Positions", i.e. roles with a non-low level of risk according to the internal guidelines. The checks include the assessment of reputation and reliability, the analysis of any conflicts of interest (including economic or financial interests in activities of Third Parties), the existence of relations with the Public Administration, the organizational position, the conferral of proxies or powers of attorney and participation in training initiatives on anti-corruption, 231 Organizational Model and Code of Ethics.

The promotion of the culture of integrity is supported by structured training activities. As part of the Compliance Department's Activity Plan, approved by the Board of Directors, there are differentiated initiatives for recipients, including awareness campaigns extended to the entire company population and programs dedicated to at-risk and newly hired functions.

100% of the functions identified as at risk are covered by anti-corruption training programs. In 2025, over 31,000 hours of training were provided on governance, ethics and anti-corruption, including e-learning modules on anti-corruption issues and related-party transactions, including simulations of real cases and final learning verification questionnaires. A specific e-learning course on anti-corruption and ISO 37001 was also made available to the entire company population, while no induction initiatives dedicated to the administrative, management, and control bodies were carried out.

In order to ensure the dissemination and accessibility of anti-corruption safeguards to internal and external stakeholders, the "Anti-Corruption Policy," the "code of ethics and conduct," the "231 Model," and the Anti-Corruption Manifesto are published on the institutional website, on the company intranet, and on the supplier portal. Contracts with business partners include a specific anti-corruption clause that requires a commitment to comply with these documents; order Vouchers are issued with an acceptance clause. Since 2023, there has also been a video interview dedicated to the main integrity principles aimed at third parties; in 2025, this content was used by 117 business partners.

In Brazil, TIM S.A. adopts a corporate risk management (ERM) process in accordance with the Corporate Risk Management Policy, aimed at identifying and managing risks that may compromise the achievement of corporate objectives. Within this system, the risk & compliance function, which reports directly to the Board of Directors, annually carries out the assessment of sensitive activities, ensuring their correlation with the relevant processes, the responsible functions, the stakeholders involved, the risk scenarios, and the mapped controls.

Through the annual anti-corruption risk assessment, TIM S.A. identifies relationships, roles, activities, and third parties with medium-high exposure to the risk of corruption, identifying sensitive activities such as agreements and contracts, authorizations and licenses, relationships with public officials and institutions, sponsorships, donations, purchases and sales of goods and services, hiring, management of variable remuneration incentives, health, safety and environmental activities, investments, and relationships with business partners. The outcome of the assessment forms the basis for the definition of monitoring priorities and any corrective actions.

In the 2025 monitoring cycle, three streams of activities considered at risk were audited, without detecting cases of corruption or bribery.

The supervision of the system is also supported by a structured flow of reporting to the governance bodies. At TIM S.A., the Risk & Compliance Department periodically provides the Board of Directors with information reports on the activities carried out in the anti-corruption field. These reports include key performance indicators related to the Anti-Bribery Management System (ISO 37001), the results of monitoring activities and integrity risk assessments, updates on improvements and non-conformities, as well as information deriving from due diligence processes, the Ethics Hotline, and related-party transactions. The reporting process allows the Board of Directors to carry out its supervisory activities on the effectiveness of the Anti-Corruption Management System.

At TIM S.A., integrity and anti-corruption issues are overseen as part of the Anti-Corruption Program, an integral part of the Integrity Program, which combines communication and training initiatives with prevention and monitoring tools. The system provides for the continuous control of areas exposed to the risk of corruption through the evaluation of internal controls, the updating of the risk matrix and the implementation of corrective action plans. Sensitive areas include, among others, the management of agreements, permits and licenses, the purchase of goods and services, the receipt or offer of gifts and invitations, representation expenses, donations to non-profit entities, financing and loans, top management operations, manual or foreign currencies payments, operations on participations and goods, the establishment of companies, and commercial and institutional sponsorships.

The dissemination of the culture of integrity is ensured through structured training programs aimed at the entire organization. During the year, 3,967 employees participated in training courses on integrity and anti-corruption policies and procedures — including anti-corruption safeguards, Code of Ethics, and governance — completing the courses and the related mandatory assessments from the moment they joined the company. The training initiatives involved the entire organization, ensuring complete coverage of the functions identified at risk, and involved 100% of the members of the corporate governance bodies, informed about the presidencies and anti-corruption procedures.

The promotion of anti-corruption practices, accounting transparency and compliance with competition rules takes place through annual training activities aimed at employees and third parties, as well as through the provision of guidelines and documentation through official company channels, including intranet, institutional website, formal communications and contractual documentation.

Metrics and targets

Disclosure Requirement G1-4 – Incidents of active or passive corruption

[24 a, b]

In 2025, as in the previous year, no cases of active or passive corruption referring to TIM S.p.A. or to the Group companies included in the reporting scope were ascertained. During the year, the monitoring of initiatives related to a proceeding related to an alleged case of corruption between private individuals concerning a former executive of the Company, which emerged in 2024, continued.

With reference to TIM S.A., in 2025 no convictions or financial penalties were imposed for violations of the legislation on active or passive corruption.

Disclosure Requirement G1-6 - Payment practices

[33 a ,b ,c, d]

In line with company procedures, the TIM Group defines differentiated standard payment terms for product groups in contracts with its suppliers.

In the Domestic area, the parent company's Purchasing department defines guidelines and standard contractual conditions applicable to relations with suppliers; the individual companies operate in accordance with these guidelines, in compliance with their respective management autonomy.

The conditions generally provide for terms not exceeding 120 days from the date of issue of the invoice, conventionally set at the last day of the month. Different conditions may be provided for in the presence, for example, of framework agreements or specific contractual clauses. Payments are made within the agreed terms, except in residual and non-significant cases attributable to disputed invoices or suspension of approval for payment.

Average payment days represent the average time between the invoice date and TIM's actual payment. The figure is calculated taking into account the value of the individual invoices, so as to proportionally reflect the weight of the different amounts, and distinguishing between payables subject to financial agreements and payables not subject to agreements.

For TIM S.p.A., 100% of the payments were made within the standard terms set. In fact, the average days from the invoice date are equal to:

- 113 days for payables subject to financial agreements;
- 100 days for those not subject to agreements;

- overall average of 103 days.

Reverse factoring programs are made available to suppliers, which allow, on a voluntary basis, the advance collection of receivables through affiliated banking institutions or the option to wait for the original contractual due date for payment of the amount due.

In 2025, there were 6 pending disputes with suppliers for alleged non-payment, for a total value of 13,206,864 euros. These disputes concern payment requests disputed by the Company, in relation to the existence of the credit and/or the failure or partial fulfillment of contractual bonds by suppliers.

For TIM S.A., the average payment days are 42 days and there are no disputes of the same nature.

Certification of the sustainability report pursuant to Article 81-ter of CONSOB Regulation no. 11971, of May 14, 1999, as amended

The undersigned Pietro Labriola, in his capacity as Chief Executive Officer of TIM S.p.A., and Maria Enrica Danese, in her capacity as Sustainability Reporting Manager of TIM S.p.A., certify, pursuant to Article 154-bis, paragraph 5-ter, of Legislative Decree no. 58 of February 24, 1998, that the sustainability reporting included in the Report on Operations has been prepared:

- in accordance with the reporting standards applied pursuant to Directive 2013/34/EU of the European Parliament and of the Council of June 26, 2013, and Legislative Decree no. 125 of September 6, 2024;
- with the specifications adopted under Article 8(4) of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020.

March 11, 2026

Chief Executive Officer

/ Signed /

Pietro Labriola

**Manager in charge of Preparing
the Sustainability Report**

/ Signed /

Maria Enrica Danese