



# Sustainability Report 2023

Consolidated non-financial  
statement 2023  
pursuant to Italian Legislative  
Decree 254/2016

# LETTER TO STAKEHOLDERS

TIM is transforming. During the year, we started the separation of the primary access fixed network, with a restructuring of the Group that has been unprecedented in Europe from an industrial point of view and with 20 billion spent, representing the 3rd deal ever in Italy and the 5th in Europe over the last 5 years. This is an operation that will breathe new life into infrastructure investments in Italy and release the energy needed to enable digital services for people and the production system to grow. Plus the new TIM will be a more solid company, finally in a position to guarantee a long-term development plan for itself and the communities in which it operates.

Along this path of profound change, the ESG plan is ensuring that the transformation of the new TIM goes hand in hand with the goals of making resources more efficient, reducing emissions, creating a sustainable supply chain, developing the digital world and overcoming the gender gap. These are the objectives the Group has been focussing on since 2020, to guarantee stability for its sustainability roadmap, and also welcome important new themes.

The 2024-2026 Plan has decreased the plan's targets from 12 to 8, perfectly aligning with the new industrial set-up and with the primary objective of focussing on what has the greatest impact for us and can actually be achieved. In two words, 'economic sustainability' - of the plan in the short and long term.

However, focus is not enough. I believe the new TIM needs to bring out its new approach to the market: simple, direct, truly connected to emerging needs, which are conditioned so much by the trending values of the new generations.

This is why we strongly want to be vocal about sustainability, making certain ESG topics a kind of 'profile' for our company. I believe this will help our customers recognise what we do and become active in their work and social spheres in general, to make a difference 'together'. We are aiming for a model where we implement initiatives and at the same time expect an endorsement from those who follow and listen to us.

An example of this approach concerns inclusion. We are overseeing numerous gender gap initiatives within group companies, such as increasing the number of women in leadership positions or eliminating the pay gap. But we are also devoting significant resources to events aimed at involving hundreds of companies and institutions on this issue in both Italy and Brazil. We have launched the Women Plus app in Italy to facilitate women's access and growth in the labour ecosystem, a project in which we have involved over 200 partners. All this can be summed up in our gender gap campaign and its message: 'equality cannot wait'. It is an invitation to everyone to be the protagonists of change, because as I have said many times, in society and in the 'time' we live in,

'inaction is not an option'.

Another key theme of our ESG plan is digital development. Digital technologies and services might not seem very distinctive for TIM, but our ESG design becomes very clear if we talk about transforming cities into smart cities and if we consider the effort spent on digitising Italy's archaeological parks and museum heritage.

ESG targets of the 2024-2026 plan dedicated to revenue growth from the Clou, IOT and Cybersecurity and the dissemination of digital signatures aim to ensure that there is a constant synergy between digitisation, economic growth and improved environmental impact.

This is the path we have outlined, but targets and projects are not enough. We must ensure their execution in the long run through a firm commitment. Stable governance is the challenge we still have to overcome.

Pietro Labriola

**[GRI 2-22]**

# The TIM GROUP at a glance

We are the first operator of Italian telecommunications, and with innovative technologies and services we are guiding the digital transition in Italy<sup>1</sup> and Brazil

With innovative technologies and services, **we are driving the digital transition of Italy and Brazil** because we want to help accelerate the sustainable growth of the economy and society by bringing value and prosperity to people, companies and institutions.

We offer diversified solutions that meet the needs of our stakeholders while also integrating **climate strategy, circular economy and digital growth objectives**.

**TIM** offers individuals and families fixed and mobile telephony services and products for communication and entertainment, and accompanies small and medium-sized businesses towards digitalisation with a portfolio tailored to their needs.

**Cloud, IoT and Cybersecurity** are at the heart of TIM Enterprise's end-to-end solutions for companies and the Public Administration, overseeing the country's digital transformation leveraging the largest network of data centres in Italy, the expertise of Group companies such as Noovle, Olivetti and Telsy, and partnerships with major groups.

We develop **4G and 5G** mobile network infrastructures and the fixed fiber network that we make available to the entire market, both through a nationwide presence and through **Sparkle** internationally.

In Brazil, **TIM Brasil** is one of the main players in the South American communications market and a leader in 4G and 5G coverage.

Through **Fondazione TIM in Italy and Instituto TIM in Brazil**, we also support projects of high social interest.

The values that unite us and characterise us are **passion and courage**, which have always helped us to meet the challenges of the market, **inclusion**, because it creates value for the entire society, and finally **integrity**, to deserve and maintain the trust of our stakeholders.

<sup>1</sup> In this document, the "Italy" perimeter refers to TIM S.p.A. and companies controlled and fully consolidated by it as of December 31, 2023. This perimeter corresponds to "Domestic BU" indicated in the non-financial report

## 2023 KEY NUMBERS

Bln€  
capital expenditures

4.0

Bln€  
revenues

16.3

Bln€  
EBITDA organic

6.4

ITALY<sup>1</sup>

PEOPLE

37,882

MUNICIPALITIES  
covered by 5G

3,294

POPULATION  
covered by 4G

99%

MOBILE LINES

30.1 Mln

FIXED LINES

15.8 Mln

ULTRABROADBAND LINES

&gt;95%

BRAZIL<sup>2</sup>

PEOPLE

9,267

MOBILE LINES

61.2 Mln

## SHAREHOLDING STRUCTURE

44.20%

FOREIGN INSTITUTIONAL INVESTORS

23.75%

VIVENDI

17.80%

OTHER

9.81%

CASSA DEPOSITI  
E PRESTITI

3.75%

ITALIAN  
INSTITUTIONAL  
INVESTORS

0.69%

TIM GROUP

## BENEFIT CORPORATION

since  
2021 **Noovle**since  
2022 **Olivetti**purchased  
in 2022 **Mindicity**

## MAIN BRANDS



A TIM ENTERPRISE BRAND



FONDAZIONE

<sup>1</sup>Includes TI Sparkle Estero, Telefonia Mobile Sanmarinese, Noovle International Sagl, Noovle Malta Ltd, Telecom Italia S. Marino, TI Capital and TI Finance<sup>2</sup>For Brazil, the "People" data presented does not consider expats, interns and young apprentices

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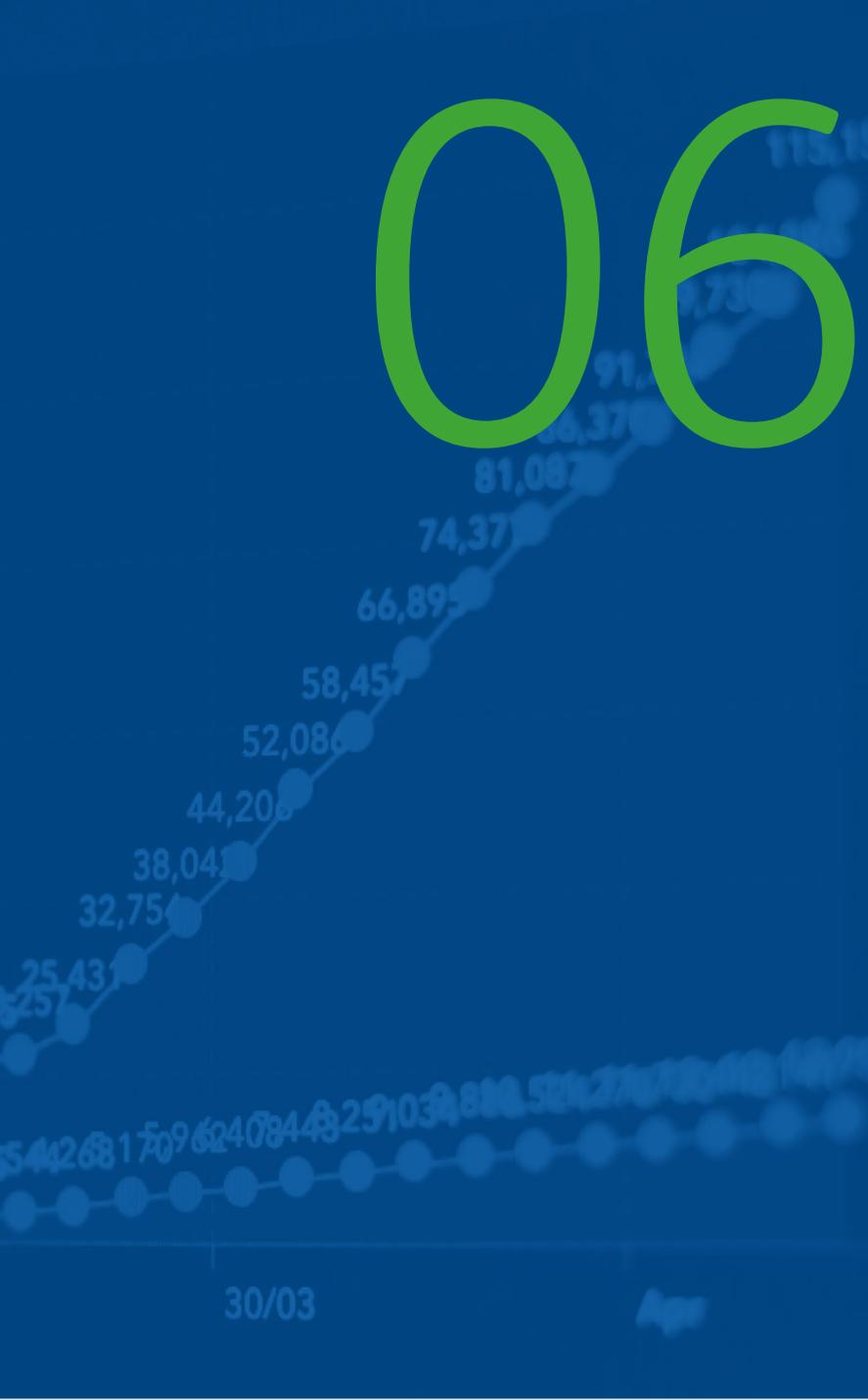
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# SUSTAINABILITY FOR TIM



# MAIN 2023 ESG RESULTS

We achieve goals in line with expectations and implemented 70 projects to support the Plan targets

## 2023 - 25 PLAN

### GROUP TARGETS

- E** Net Zero (Scope 1+2+3)<sup>1</sup>
- E** Carbon Neutrality (Scope 1+2)<sup>1</sup>
- E** Scope 3 Reduction<sup>3</sup>
- E** Renewable energy on total energy<sup>4</sup>
- S** Women in leadership position<sup>5</sup>

### DOMESTIC TARGETS

- E** Green Products & Smartphones<sup>6</sup>
- E** Circular Economy ratio<sup>7</sup>
- S** IoT, Cloud & Security service revenues<sup>8</sup>
- S** Digital Identity Services<sup>9</sup>
- S** % People trained on ESG skills
- S** Young Employees Engagement
- S** FTTH Coverage (% of technical units)

	2040	2030	2030	2025	2025
2,265,443 <sup>2</sup> tCO <sub>2</sub> eq					
-58%					
1,928,756 <sup>2</sup> tCO <sub>2</sub> eq					
72%					
30%					
≥70%					
2€/kg					
+21% CAGR 23-25					
+30% CAGR 23-25					
≥90%					
≥78%					
48%					
70%					
0.45€/kg					
+9% vs 22					
+45% vs 22					
95%					
77%					
38%					

## CLOSING 2023

- E**
  - ▶ **540 GWh/a of green energy** through Power Purchase Agreements
  - ▶ Less consumption due to the shutdown of obsolete fixed and mobile assets
  - ▶ More than **16 thousand regenerated modems**, and over **19 thousand smartphones returned** with trade in services
- S**
  - ▶ **Digital Signature** over-performance (+47% of certificates compared to 2022)
  - ▶ Telsy acquires TS-Way for the prevention and analysis of cyberattacks
  - ▶ Over **255 thousand civic buildings in 463** municipalities covered by the "Italia 1 Giga" Fiber Plan
  - ▶ **Gender Equality Certification** (UNI/PDR 125) awarded
  - ▶ Launch of the **#LaParitàNonPuòAspettare** (EqualityCan'tWait) communication campaign in the press, on the web, social media and TV
  - ▶ **Launch of 'Women Plus'**, the first app to help women in their job search that also offers training and mentoring
- G**
  - ▶ **New Code of Ethics** that recognises sustainability as a core part of TIM's long-term strategy
  - ▶ **ESG platform** for tracking sustainability data related to objectives, projects and non-financial reporting.

<sup>1</sup> For Scope 2, emissions are calculated using the Market Based method

<sup>2</sup> We report the absolute emissions and not the percentage progress compared to the Baseline 2019 (for Net Zero equal to tco2eq 5,823,608 and for Scope 3 equal to tco2eq 5,031,235) because in 2023 we applied a different and more accurate methodology for Scope 3 not comparable to that used in 2019

<sup>3</sup> Baseline 2019

<sup>4</sup> Target has been adjusted to consider electricity purchase only

<sup>5</sup> Weighted average of Italy target ≥ 27% made up of "Italian women managers and directors" and Brazil target ≥ 35% made up of "Brazilian women managers and directors"

<sup>6</sup> Sellout stock

<sup>7</sup> Average revenue from resale of waste, materials and goods no longer used per kg of waste produced

<sup>8</sup> Baseline 2022

<sup>9</sup> PEC, SPID, Digital Signature - growth on active services baseline 2022

# PILLARS AND TARGETS OF THE 2024-2026 PLAN

We give continuity to our ESG commitments also with the new industrial organisation

With the plan undertaken to spin off and sell the fixed network infrastructure, the ESG pillars have not changed for the Group: do more with less resources, be more efficient and reduce emissions, lead and stimulate Italy's digital transformation, embody a true social transformation by overcoming the gender gap.

However, the targets of the 2024-2026 plan have been reduced from 12 to 8, in perfect alignment with the new industrial structure and the primary goal of being concrete, in order to focus on what has the greatest impact for us and what we can actually achieve. In short, 'economic sustainability' of the plan in the short and long term.

A core aspect of the 2024-2026 plan will be the adoption of the rules and standards provided by the new regulation on sustainability reporting (Corporate Sustainability Reporting Directive), that will lead us to further strengthen the assessment of sustainability impacts and risks, and introduce the impact of investments, to make our relationship with investors even stronger.

## PLAN 2024-2026

### GROUP TARGETS

E	Net Zero (Scope 1+2+3) <sup>1</sup>	2040
	Carbon Neutrality (Scope 1+2) <sup>1</sup>	2030
S	Scope 3 Reduction <sup>2</sup>	-42% 2030
	Renewable energy on total energy <sup>3</sup>	100% 2025
	Women in leadership position <sup>4</sup>	≥33% 2026

### DOMESTIC TARGETS

E	TIM brand products with carbon footprint <sup>5</sup>	100%	2026
S	IoT, Cloud & Security service revenues <sup>6</sup>	+19% CAGR 24-26	2025
	Digital Identity Services <sup>7</sup>	+30% CAGR 23-25	2025

<sup>1</sup> Baseline 2023. For scope 3, categories 1, 2 and 11 are considered

<sup>2</sup> The target has been reformulated to take into account the change of the baseline to 2023 and according to SBTi's annual reduction expected up to 2030

<sup>3</sup> Electricity purchase

<sup>4</sup> Weighted average of target Italy ≥30% made up of "Italian women managers and directors" and target Brazil ≥36% made up of "Brazilian women managers and directors"

<sup>5</sup> Sellout of TIM branded modems

<sup>6</sup> Baseline 2023

<sup>7</sup> PEC, SPID, Digital Signature (growth of active services, baseline 2022)

# ESG ALLIANCES AND PARTNERSHIPS

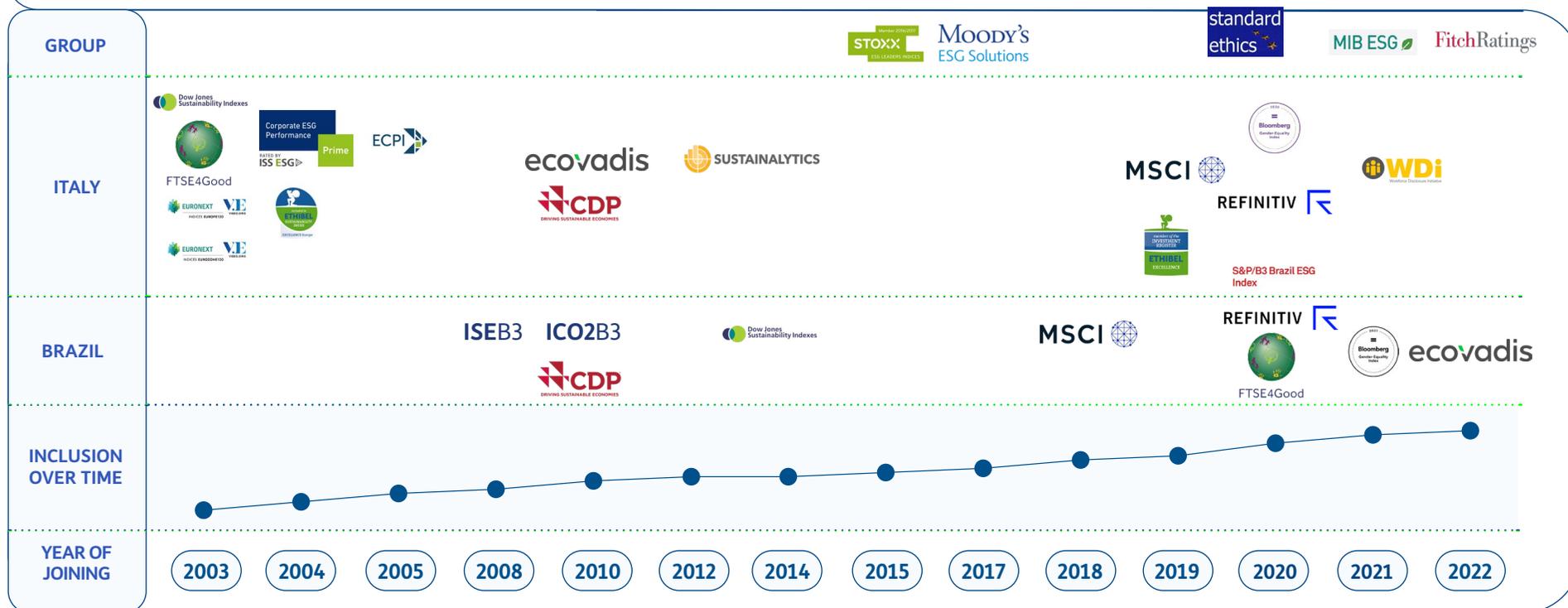
We collaborate with national and international organisations to promote sustainable development

## TIM'S MAIN COLLABORATIONS

Since 2022		<b>Eco Rating</b>	We support the initiative of international mobile phone operators that evaluates the environmental impact of smartphones to help customers make informed and more sustainable choices and encourage suppliers to reduce the environmental impact of their devices
Since 2022		<b>European Green Digital Coalition</b>	We are part of the alliance formed by the main European companies in the ICT sector to enhance the role of digitalisation in reducing CO2 emissions through innovative technologies with a low environmental impact
Since 2022		<b>Open-es</b>	TIM in Italy is a partner of the system alliance that aims to identify the sustainability performance of suppliers, strengthen the qualification process with ESG market standards and build shared growth paths
Since 2022		<b>SBTi</b> Science Based Targets initiative	We obtain scientific validation of our environmental strategy from the international organization that promotes the definition of measurable objectives to reduce carbon footprint and validates them independently
Since 2020		<b>ASVIS</b> Alliance for Sustainable Development	We are sponsors of the Italian alliance created to make economic entities and institutions aware of the importance of the commitments of the 2030 Agenda for sustainable development
Since 2010		<b>JAC</b> Joint Alliance for CSR	We are founding members of the international association of telecommunications operators that verifies, evaluates and develops sustainability in the supply chain of the information communication technology industry
Since 2010		<b>Valore D</b>	Since 2010 we have been a supporting partner of the first association of companies in Italy, which since 2009 has been a pioneer in addressing the issue of gender balance and the dissemination of a culture of inclusion to support innovation, progress and the growth of organisations and the country.
Since 2009		<b>Parks - Liberi e Uguali</b>	We are among the founding members of the non-profit association that promotes Diversity Management as a source of value and competitive advantage, bringing together employers for the development of D&I strategies and practices with a predominant focus on the area related to sexual orientation and gender identity
Since 2008		<b>GeSI</b> Global Enabling Sustainability Initiative	We are partners of the international association for digital transformation that provides members who work in the ICT field with a unified voice towards stakeholders, policy makers and the institutional community in the sector
Since 2002		<b>Global Compact</b>	We are members of the Global Compact Network Italy, which promotes a sustainable global economy that respects human and labour rights, environmental protection and the fight against corruption.
Since 1995		<b>GSMA</b> Global System for Mobile Communications Association	We are members of this international association that brings together the main mobile operators and develops studies on the positive contribution of technology in reducing greenhouse gas emissions and achieving sustainable development goals
Since 1992		<b>ETNO</b> European Telecommunications Network Operators' Association	We are part of the European association of telecommunications network operators whose mission is to develop a regulatory environment that promotes the provision of services for citizens and businesses
Since 1988		<b>ETSI</b> European Telecommunications Standards Institute	We are members of the leading European telecommunications standardization organization
Since 1970		<b>ITU</b> International Telecommunication Union	We are members of the United Nations Agency whose objective is to coordinate global telecommunications activity

# ESG INDICES AND RATINGS

Since 2003 we are included in more than 20 ESG indices and ratings that confirm our sustainability performance



# ESG INDICES AND RATINGS

Our performance in 2023 led to important recognition from ESG rating agencies

## MAIN 2023 RECOGNITIONS



The Group entered the CDP A-List as a leader in corporate transparency and performance on climate change.



The Group was confirmed in the Dow Jones Sustainability Europe Index and among Sustainability leaders in the S&P Global sector as the only Italian company in the telco sector.

The group has been included in the **S&P Top 10% ESG Score** Global Sustainability Yearbook 2024.



The Group was awarded the Ecovadis Platinum Medal as part of the 1% of the best companies for ESG performance in terms of work, human rights, environment, ethics and the supply chain.



The Group was confirmed as world leader in the telco sector for diversity and inclusion policies in the Refinitiv Diversity and Inclusion index.



In Italy, TIM was once again awarded as the best company for the inclusion of LGBT people by the **LGBT & Diversity Index**.



TIM in Italy was confirmed in the Top 10 of the Diversity Brand Index for its commitment to Diversity & Inclusion.

A photograph of a dirt path winding through a dense forest of tall, thin trees. The entire image is overlaid with a semi-transparent green filter. The path leads from the foreground into the distance, flanked by trees on both sides.

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EN  
VIRO  
NMENT

# ENVIRONMENTAL STRATEGY

We work to achieve 'zero-emissions' and maximize resource use efficiency

Our environmental strategy has been set since 2020 and is based on **three key factors**:

- ▶ accompany the exponential growth of voice and data traffic with the adoption of innovative technologies and a virtuous behaviour in order to be more efficient;
- ▶ reduce emissions, including those determined by our supply chain (Scope 3);
- ▶ actively participate in the growth of the circular economy, mainly regarding to the use of products with high emissivity values and made with scarce resources, such as smartphones and modem.

In summary, our plan includes:

- ▶ reducing energy consumption and other resources;
- ▶ using 100% green energy with a focus on the use of Power Purchase Agreements;
- ▶ applying circular economy criteria to our offer, processes and activities;
- ▶ implementing a sustainable Supply Chain.

All the activities described above will lead us to achieve the primary environmental targets for the TIM Group: Carbon Neutrality<sup>1</sup> by 2030 and Net Zero<sup>2</sup> by 2040.

Our climate strategy was validated by the **Science Based Targets initiative (SBTi)** in 2022 in line with the objective of keeping global warming within 1.5°C.



During 2024, we will confirm our environmental targets, however, modifying the reference baseline (from 2019 to 2023) to take into account the change in the Group's perimeter and the new methodology adopted for calculation Scope 3.

We will therefore submit our targets again to the SBTi to take these changes into account.

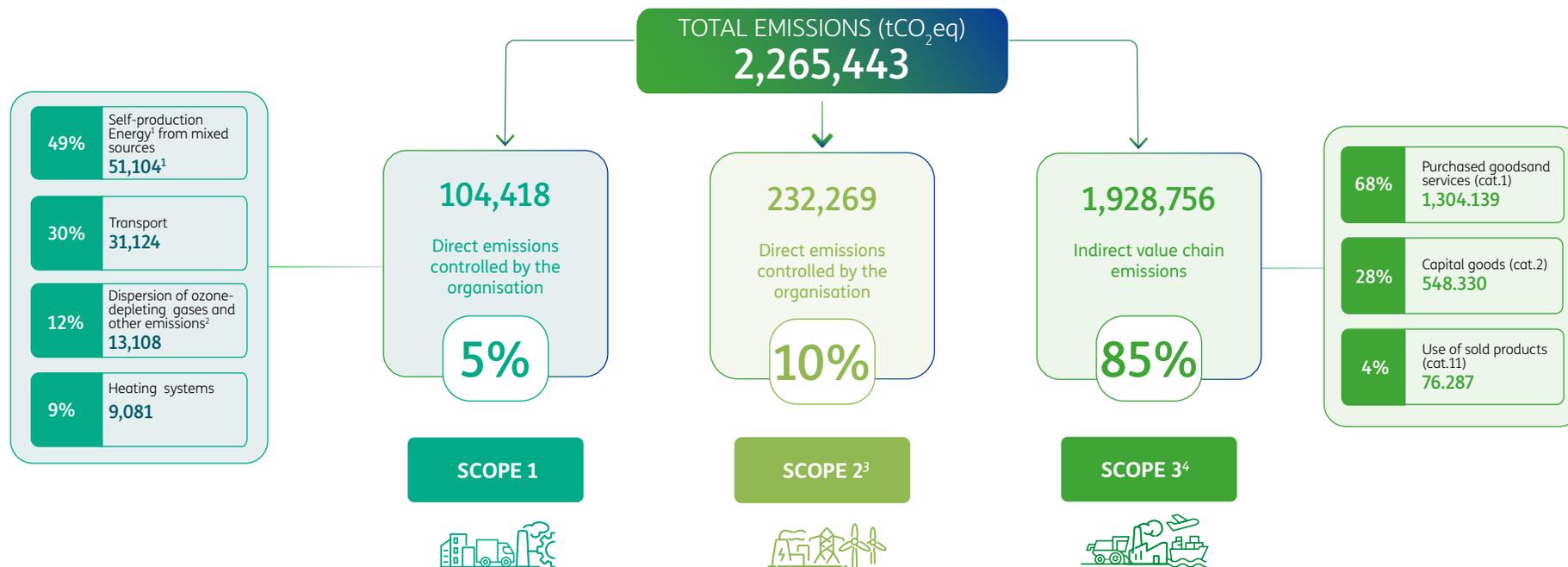
<sup>1</sup> Scope 1+2 emissions

<sup>2</sup> Scope 1+2+3 emissions

# GREENHOUSE GAS EMISSIONS

We analyse our activities to define a path to reduce emissions

To measure our company's CO<sub>2</sub> emissions, we apply the 'GHG Protocol', which makes a distinction between direct emissions (Scope 1), indirect emissions (Scope 2) and other indirect emissions (Scope 3).



The data shown have been rounded off; it follows that the sums may not correspond to the totals reported

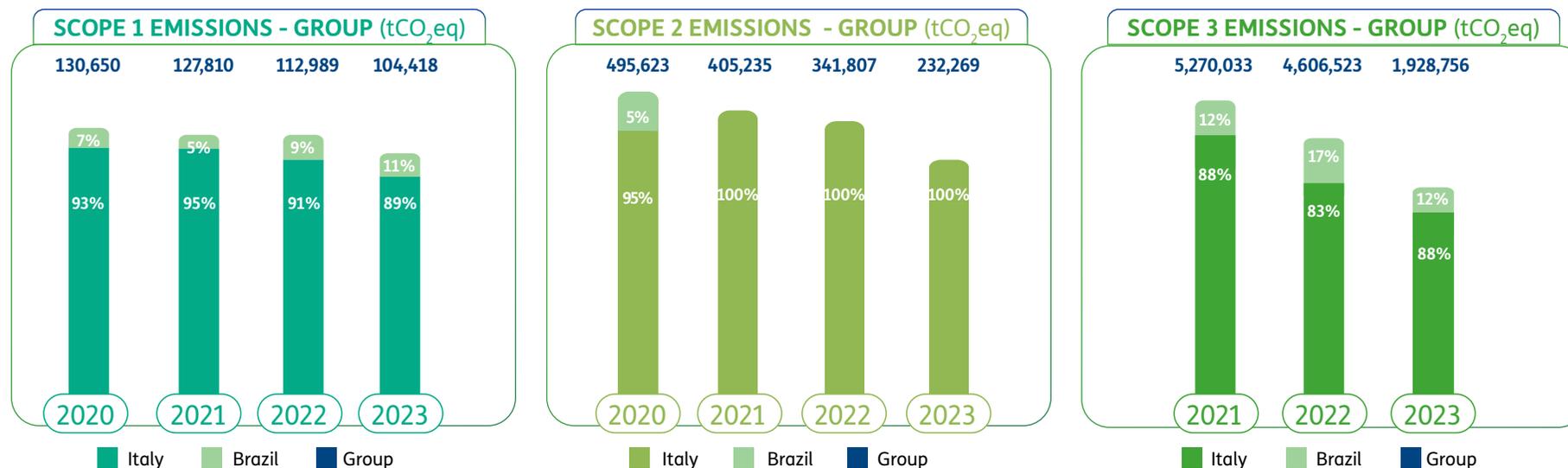
<sup>1</sup> The data include emissions from diesel fuel for generator sets, emissions from natural gas for self-generation and emissions from trigeneration

<sup>2</sup> Include emissions from machinery used for maintenance and cleaning plants, from tributaries, spewed from biogas, and fugitive emissions in addition to ozone gas leakage

<sup>3</sup> The reported Scope 2 emissions were calculated using the Market-Based methodology

<sup>4</sup> Scope 3 includes the measurement and certification of 3 emission categories out of 15

# GREENHOUSE GAS EMISSIONS



**Scope 1** emissions mainly concern the consumption of fossil fuels for heating and trigeneration systems in power plants and data centers, generator sets and the company fleet. In 2023, thanks to decommissioning and energy efficiency interventions, we recorded:

- ▶ an 8% reduction compared to 2022
- ▶ a 32% reduction compared to 2019

**Scope 2** emissions refer to the purchase of electricity to power infrastructure and offices. In 2023, thanks to the increasing use of energy from renewable sources in Italy and the 100% green energy already achieved in Brazil, we recorded:

- ▶ a 32% reduction compared to 2022
- ▶ a 64% reduction compared to 2019

**Scope 3** emissions, generated upstream and downstream of production activities, consider the purchase of goods and services (cat. 1), the purchase of capital goods (cat. 2) and the use of sold products (cat. 11).

In 2023, we made a significant effort to improve the Scope 3<sup>2</sup> calculation methodology. The calculation is consistent but creates a discontinuity toward the emission results of previous years. Starting from 2024, we will realign trends based on the new organizational perimeter and the new calculation methodology<sup>3</sup>

<sup>1</sup> Emissions were calculated using the Market Based method

<sup>2</sup> An expenditure-based method was used for categories 1 and 2. Eurostat NACE emission factors were applied to each purchase category, replacing those in the GHG Protocol's "Quantis Evaluator" tool used in the 2021 and 2022 calculations. For category 11, starting from the sell out data for each product category, the factors were identified emission factors and relevant energy consumption parameters based on the following sources: LCA Analysis/Environmental Statements/Technical Data Sheets published by manufacturers and Ecoinvent Database

<sup>3</sup> In order to ensure consistency of the results for the past three years, the calculation methodology was also applied for the years 2021 and 2022. Based on the new calculation criteria, the GHG emissions Scope 3 in 2021 are 1,796,793 tCO<sub>2</sub>e and in 2022 are 1,792,261 tCO<sub>2</sub>e (in 2021 and 2022 cat. 11 was calculated only for Italy)

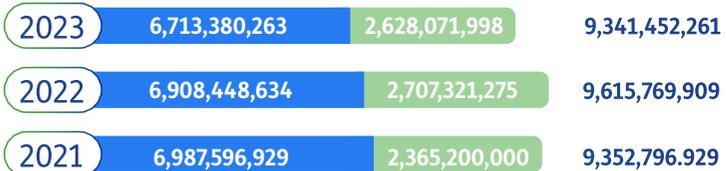
# ENERGY EFFICIENCY

We reduce consumption through efficient infrastructure and the use of eco-efficient technologies

In 2023, we continued to contain the increase in total energy consumption for fuel, gas and electricity despite the growth in fixed and mobile voice and data traffic and data centre activity.

A goal we achieved thanks to the use of technologies that allowed better performance with the same energy resources.

### INTERNAL ENERGY CONSUMPTION - GROUP (Mj)



### EFFICIENCY INFRASTRUCTURE INDICATORS

#### ECO-EFFICIENCY - ITALY AND BRAZIL (bit/joule)



Eco-efficiency relates voice and data traffic on fixed and mobile networks to industrial, civil and corporate fleet energy consumption.  
The more the value increases, the more the service offered to customers is eco-efficient.

ITALY +13% vs 2022  
BRAZIL +28% vs 2022

#### CARBON INTENSITY - ITALY AND BRAZIL (KgCO<sub>2</sub>eq/Tbit)



Carbon intensity relates the emissions generated by industrial, civil and corporate fleet energy consumption and the purchase of electricity (Scope 1 and Scope 2) to voice and data traffic on fixed and mobile networks.  
The more the value is reduced, the lower the emission impact of the service offered to customers.

ITALY -33% vs 2022  
BRAZIL -10% vs 2022

#### AVERAGE PUE - ITALY E BRAZIL



Power Usage Efficiency (PUE) relates the energy consumed by IT equipment to the energy consumed by the entire data center.  
The more the value tends to 1, the more efficient the data center is because it directs energy only to the IT portion.  
In 2023, the changed climatic conditions led to an increase of 2% in Italy compared to a sector average of 1.58%<sup>2</sup>.

ITALY - PUE Public Cloud TIM at full load is 1.3

TIM Brasil's 2022 energy consumption and carbon intensity differs from that reported in TIM Brasil ESG Report due to different classification of energy consumption, aligned from 2023

<sup>1</sup> Location Based Approach

<sup>2</sup> Source Survey Uptime Institute 2023

<sup>3</sup> Value adjusted from "1.87" (reported in 2022 Sustainability Report) to "1.90" to align with TIM Brazil disclosure

# ENERGY EFFICIENCY

## Efficiency interventions on infrastructure

In 2023, we continued the decommissioning and energy efficiency of industrial sites to reduce energy consumption.

### FOCUS ITALY

#### FIXED AND MOBILE NETWORK

We have around **10,500 fixed/mobile network industrial sites** in over **6,900 municipalities**

#### DECOMMISSIONING

- ▶ 56 decommissioned fixed network exchanges, with an energy saving of about **28 GWh**
- ▶ about **19,000 decommissioned mobile network** sites, with a saving of about **117 GWh**
- ▶ more than **13,000 decommissioned public telephone cabins**

#### ENERGY EFFICIENCY

- ▶ **Building Energy Management Systems (BEMS)** in 67 strategic exchanges
- ▶ Use of “**Energy Performance Contract**” (EPC) in 82 power stations
- ▶ Improved energy performance for more than **1,600 air conditioners in 131 exchanges**
- ▶ Use of cogenerators for self-generation of energy for cooling units and air conditioners
- ▶ Distribution of a **set of rules with ten good habits** for more sustainable exchanges

#### 2023 SAVING

##### DECOMMISSIONING

ENERGY	145 GWh
COSTS	30.74 Mln€
EMISSIONS	55,390 tCO <sub>2</sub> eq

##### EFFICIENCY

ENERGY	50 GWh
COSTS	10 Mln€
EMISSIONS	19,100 tCO <sub>2</sub> eq

##### ENERGY EFFICIENCY CERTIFICATES

NUMBER	26,807
REVENUES	6.6 Mln€



LA FORZA DELLE CONNESSIONI

### WORKING TOGETHER FOR MORE SUSTAINABLE EXCHANGES

How we behave also counts towards achieving our target to reach Carbon Neutrality by 2030! By adopting good habits at work together, we can save up to 8,000 tCO<sub>2</sub>eq in one year, the equivalent of planting more than 14,000 trees.

\*Estimated value, not verified



**USE ONLY ELECTRICAL APPLIANCES PROVIDED BY THE COMPANY**  
Do not use personal cookers, kettles, electric or microwave ovens or refrigerators



**DO NOT LEAVE ANY TYPE OF WASTE AT THE EXCHANGE**  
Including that considered to be municipal waste (as there is no collection) or waste related to work carried out



**TURN OFF WATER WHEN NOT IN USE**  
Report any leaks immediately



**KEEP WINDOWS CLOSED IN AIR-CONDITIONED ROOMS**  
Or only open as long as necessary for fresh air



**CHOOSE NATURAL LIGHT WHEN WORKING**  
If you use electric lights, remember to switch them off when you have finished



**SWITCH OFF DEVICES AT THE END OF THE DAY**  
Unless specific procedures require them to be left on



**REPORT OR ENSURE REGULAR CLEANING OF FILTERS**  
And fans to maximise the energy efficiency of air conditioning systems



**DO NOT CHANGE THE TEMPERATURE SET POINT ON AIR CONDITIONING SYSTEMS**  
And report immediately if it is not at the set point



**USE THE “WELL-BEING MODE” CORRECTLY**  
Where present and for as long as necessary to achieve a comfortable room temperature. Check that it is working properly and report any anomalies



**REPORT ANY SYSTEMS THAT CAN BE SWITCHED OFF**  
And/or systems that is no longer in use

For all employees

For specialised personnel

BECOME A SUSTAINABILITY PROMOTER  
ENCOURAGE COLLEAGUES TO BE RESPONSIBLE

Reports can be sent with your smartphone via the ONE platform by connecting to Cubo\_HELP

# ENERGY EFFICIENCY

## FOCUS ITALY

### THE DATA CENTERS

We manage 16 Data Centers in 8 cities that guarantee the highest levels of operation, security and energy efficiency

#### Design criteria

Eco-sustainable criteria were used for the **Public Cloud Data Centers** built in 2021-2022, including building materials free of contaminants, lighting systems that reduce light pollution and ecological paints.

#### Efficient management

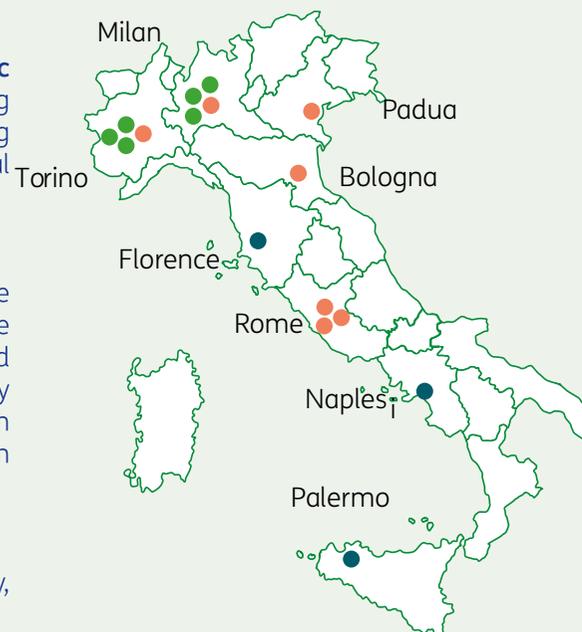
In the **"Core" Data Centers**, interventions have continued to optimize the cooling and lighting of the rooms, to renew the continuity systems (UPS), and the conditioning systems with an average energy saving of approximately **5.71 GWh/year** (of which about **0.81 GWh/year** are related to interventions on IT infrastructures).

#### Certifications

**Over 100 certifications** attest to the efficiency, sustainability, and safety of the sites. Among these:

- ▶ **ISO 50001** for the energy management system
- ▶ **ISO 14001** for the environmental management system
- ▶ **ISO 14064-1** for quantifying and reporting the organization's GHG emissions
- ▶ **ISO 27001** for information security management
- ▶ **LEED Gold and Platinum** for the eco-sustainability of building design and construction.

Additionally, the Data Centers adhere to the standards of the **European Code of Conduct for Data Centres** (EU DC CoC).



#### 7 Data Center Core

offering maximum-performance cloud and co-location services

#### 6 Data Center Public Cloud

where the platforms of the most important public cloud providers operate

#### 3 Service Centers

secure and reliable micro data centres close to customer sites

# ENERGY EFFICIENCY

## The corporate fleet

Work on our company vehicle fleet is aimed at optimising running costs and reducing fuel consumption.

### FOCUS ITALY

We manage over 11,600 vehicles

over 9,400 work vehicles

- ▶ Six-monthly renewal of the Car List
- ▶ 5% increase in demand for hybrid/electric cars compared to 2022

over 2,000 cars for mixed use

- ▶ Reduction of about 1,700 vehicles by 2022

200 cars in car sharing

- ▶ Present in 14 cities and 32 locations
- ▶ 50 vehicles with Full Electric power supply

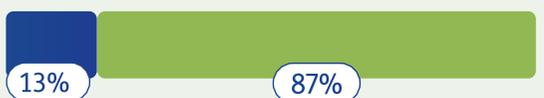
52 electricity charging stations

- ▶ Present in 13 cities and 31 locations
- ▶ 11% increase compared to 2022

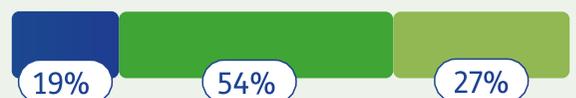


### TYPES OF VEHICLES

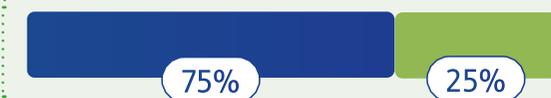
#### WORK VEHICLES



#### CARS FOR MIXED USE



#### CARS IN CAR SHARING



■ Petrol ■ Diesel fuel ■ Electric/hybrid

# ENERGY EFFICIENCY

## TIM websites

In 2023, we continue to neutralise the CO<sub>2</sub> impact generated by TIM's main commercial and institutional websites.

### FOCUS ITALY

## WE OFFSET THE CLIMATE IMPACT OF OUR WEBSITES

In 2023, the Group's 18 main websites generated almost 490 million pageviews, corresponding to 397 tCO<sub>2</sub>eq, or about 33 laps around the globe by car.

The calculation was made in collaboration with the Rete Clima<sup>1</sup> and considers the energy consumption of the servers hosting the websites and the services that make them work.

Emissions were then neutralised by supporting the 'Envira Amazonia REDD+' project in Brazil, which aims to prevent deforestation and degradation of the Amazon rainforest

The project promotes the conservation and sustainable management of forests through:

- ▶ the protection of animal and plant species at risk;
- ▶ training courses on sustainable agriculture for local communities
- ▶ social programs for the collection, transport and sale of açai and medicinal plants to create new job opportunities

<sup>1</sup> The CO<sub>2</sub>web® calculation methodology owned by Rete Clima, a non-profit organisation specialising in the promotion of sustainability in organisations, is verified by the Certification Authority ICMQ. The Project is certified according to the VCS-Verra standard, validated and verified according to the CCBS standard - The Climate Community and Biodiversity Standards with Triple Gold Level Distinction

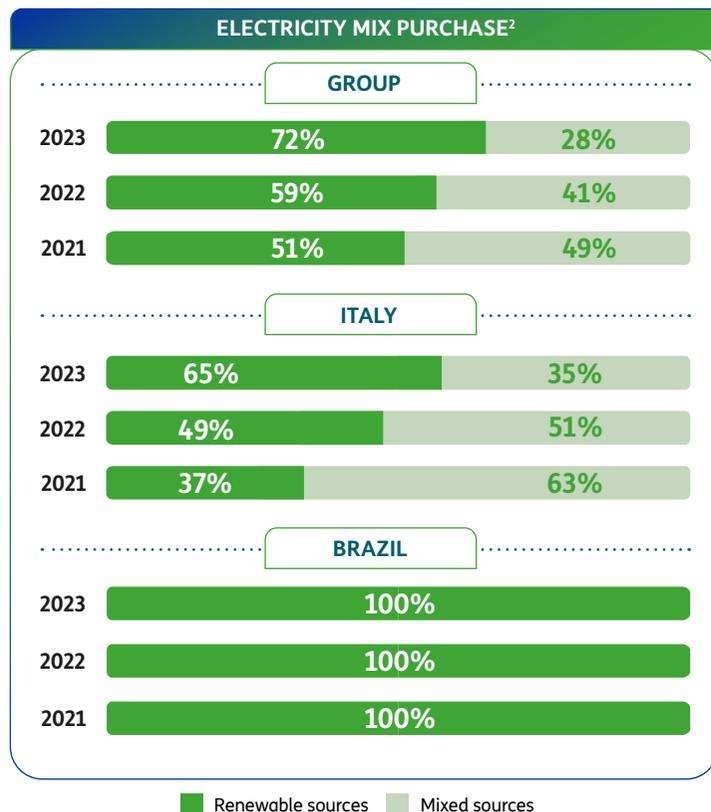
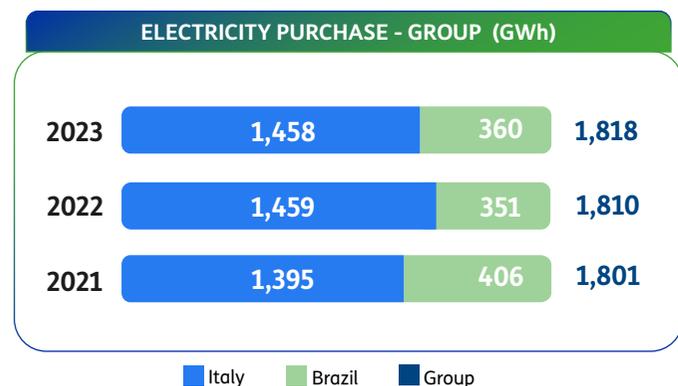


# ELECTRICITY

We purchase more renewable energy with the goal of achieving 100% green electricity by 2025<sup>1</sup>

In 2023, green electricity made up 72% of the total electricity purchased by the Group.

In Italy, the percentage reached 65%<sup>3</sup> while in Brazil it has been 100% since 2021.



<sup>1</sup> The 100% Renewable Energy target has been adjusted to consider only purchased electricity

<sup>2</sup> The 2021 and 2022 Electricity Mix Purchase values has been adjusted as a result of the recalculation of the 100% Renewable Energy target made in 2023 to exclude self-production

<sup>3</sup> The percentage of purchased and self-produced Renewable Energy out of the total purchased and self-produced Energy is instead equal to 61%

# ELECTRICITY

## Renewable energy sources

PURCHASE

- ▶ ~950 GWh<sup>1</sup>/y of renewable energy with Guarantees of Origin<sup>2</sup> (GO) of which 57% in the form of Power Purchase Agreements (PPA)
- ▶ a new **PPA agreement** for 200 GWh/y (23-31) was stipulated, supplementing the existing agreement (21-30) for a total supply of 540 GWh/y of green energy

GO

~950 GWh

of wich PPA

~540 GWh/a

SELF-PRODUCTION

- ▶ 80 photovoltaic plants activated out of 115 being planned, from which we produce about 0.32 GWh/y of green energy<sup>3</sup>
- ▶ an agreement with Enel X was signed for the installation of a photovoltaic plant in Pisa exchanges 'La Figuretta', with an estimated production, starting from 2024, of more than 1.6 GWh/y

n. 1 Umbria

n. 2 Calabria

n. 5 Basilicata

n. 5 Emilia Romagna

n. 5 Marche

n. 6 Lombardy

n. 7 Piedmont

n. 7 Sicily

n. 7 Veneto

n. 9 Campania

n. 10 Latium

n. 16 Apulia

Noovle Data Center  
Offices  
TIM Retail Stores  
Sparkle installations in Italy

FOCUS ITALY

PURCHASE

- ▶ Over 360 GWh/y of renewable energy purchased from the free and captive market

FREE MARKET

169 GWh

CAPTIVE MARKET

191 GWh

SELF-PRODUCTION

- ▶ More than 276 GWh/y of renewable electricity produced over 100 plants, mainly solar

DISTRIBUTED GENERATION

over 276 GWh/y

FOCUS BRAZIL

<sup>1</sup> Correspond to 65% of the electricity purchased and refers to energy calculated at the PoW (Point of Withdrawal).

<sup>2</sup> Guarantees of Origin are electronic certificates that attest to the renewable origin of the sources used.

<sup>3</sup> Out of a total of 0.38 GWh/a of self-produced renewable energy in Italy

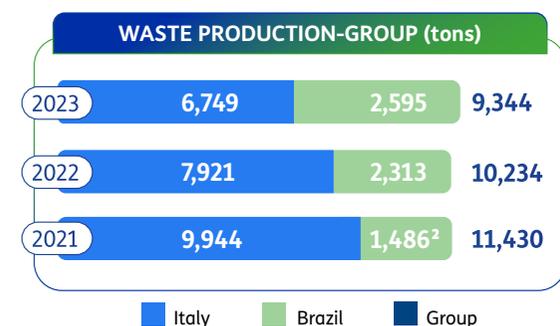
# CIRCULAR ECONOMY AND RESOURCE EFFICIENCY

We adopt processes to transform waste into value

## Reducing waste and creating value

In Italy, we measure our ability to create value from waste through the 'Circular Economy Ratio'<sup>1</sup>, which indicates the average unit revenue from the resale of waste and unused equipment and materials per kg of waste produced.

In 2023, there was an increase of 0.15 €/kg compared to 2022, thanks to resale revenues of over € 3 Mln.



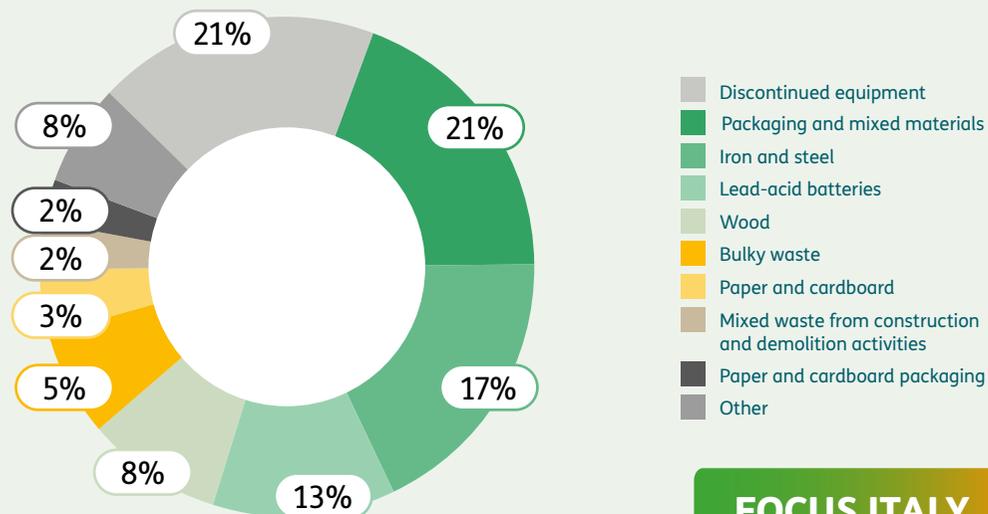
<sup>1</sup> The perimeter of reference for the Circular Economy Ratio includes: TIM SpA, Sparkle Italia, Sparkle Greece, Sparkle Turkey, TIM Retail, Telecontact, TIM Trust Technologies, Telsy, Noovle and Olivetti

<sup>2</sup> Brazil 2021 data differs from TIM Brasil DNF due to the different calculation methodology, aligned as from 2022

### CIRCULAR ECONOMY RATIO



### MAIN TYPES OF WASTE



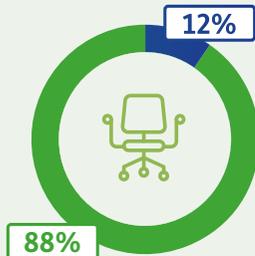
**FOCUS ITALY**

# CIRCULAR ECONOMY AND RESOURCE EFFICIENCY

## The donation of unused company assets and the resale of materials

### THE REUSE OF FURNITURE, COMPANY EQUIPMENT AND MOBILE PHONES

over **9,500**  
furniture

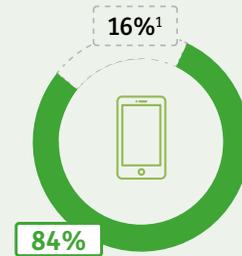


over **4,500**  
computer equipments



■ Reused ■ Donated

about **35,000**  
business smartphones



**-323t** of waste  
thanks to the regeneration  
and reuse of assets

over **1,500**  
assets donated to  
non-profit organizations

**-3.614 tCO<sub>2</sub>eq**  
equal to about 405 laps of  
the globe by car

- ▶ Set up of **200 workstations** at the TIM headquarters in San Benedetto in Cagliari, with the reuse of around 1,000 pieces of furniture including desks, chairs, lockers and drawers
- ▶ Donation of **furniture** to equip schools and hospitals in Senegal in cooperation with the Prati Care Association
- ▶ Donation of **PCs** to schools in Africa and Asia (Tanzania, Madagascar, Burundi and Nepal) to help the students to learn computer skills

### THE RECOVERY OF NETWORK EQUIPMENT AND MATERIALS



#### NETWORK EQUIPMENT

Recovered  
**4,000 tons** of precious metals  
and other raw materials with a  
total revenue of about **600,000€**



#### COPPER CABLES

**700 tons** recovered and sold  
with a total revenue of  
about **1.8 Mln€**



#### SERVERS AND TELECOMMUNICATIONS EQUIPMENT

About **16,400** unused units  
resold with a total revenue  
over **500,000€**

**FOCUS ITALY**

<sup>1</sup>Percentage of smartphones under evaluation for reuse/donation in 2024

# CIRCULAR ECONOMY AND RESOURCE EFFICIENCY

## FOCUS ITALY

### DONATION TO FAI OF THE FORMER MONASTERY OF SAN BERNARDINO IN IVREA



Fondazione  
Adriano  
Olivetti

In 2023, together with the **Olivetti heirs**, we donated to the FAI the complex of the former **Monastery of San Bernardino in Ivrea** that covers more than **40,000 square meters**. This area includes **wooded and recreational spaces** of great historical and cultural interest, as well as the related church, embellished with **late medieval frescoes**.

Thanks to this donation and the restoration and redevelopment project financed by the Ministry of Culture and Compagnia di San Paolo, the complex will once again be open to the public, becoming **a cultural and recreational centre for the local community of Ivrea**.

GRAZIE A



CON IL PATROCINIO DI



Associazione

ARCHIVIO  
STORICO  
OLIVETTI



# CIRCULAR ECONOMY AND RESOURCE EFFICIENCY

## Attention to resource consumption

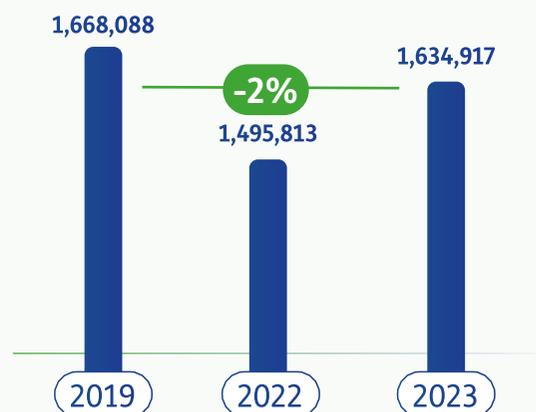
We reduce the consumption of natural resources such as water, and materials like paper and plastic to contain waste and encourage sustainable behaviour in the company.

FOCUS ITALY

### WATER

During 2023, we consumed 1,634,917 m<sup>3</sup> of water, 90% of which was for civil use and 10% for industrial use (trigeneration and cooling).

#### WATER CONSUPTION (m<sup>3</sup>)



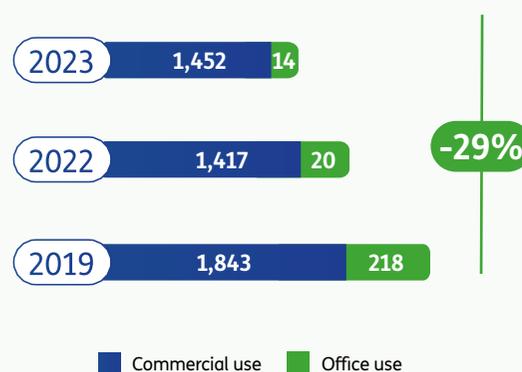
Excluded comparison with the pandemic period (2020-2021) and partial recovery of activities (2022)

### PAPER

We purchase paper for office and commercial use. On the commercial side, we are aiming for a gradual digitisation of bills, commercial contracts and our archives.

We use paper produced according to Forest Stewardship requirements. 

#### PAPER CONSUMPTION<sup>1</sup> (tons)



Excluded comparison with the pandemic period (2020-2021) and partial recovery of activities (2022)

<sup>1</sup> 2019 and 2022 data adjusted as a result of recalculation

### PLASTIC

In 2023 plastic waste generated by our activities amounted to about 96 tons.

#### WATER DISPENSER INSTALLATION PLAN (2022/2023)



- 25 Water dispensers
- 11 Company locations
- 158,000 Plastic bottles (each of 0.5l) in one year
- 15.8 tCO<sub>2</sub>eq
- Equal to about 15 flights Milan-New York

# TIM GREEN

We offer products and services with a low environmental impact

FOCUS ITALY

## PRODUCTS

7 Mln products

1.4 Mln fixed telephony<sup>1</sup>

5.6 Mln mobile telephony<sup>1</sup>

70% Green products

16% fixed telephony<sup>1</sup>

54% mobile telephony<sup>1</sup>

- ▶ over **53,000 regenerated products** given as replacement
- ▶ about **36t of electronic waste diverted from landfills and 1,300 kg of rare resources recovered** since 2016, in cooperation with our Partners
- ▶ **around 1,700** refurbished smartphones sold
- ▶ **more than 16,000** remanufactured modems thanks to the collaboration with the inmates of Turin Prison<sup>3</sup>

The more than 200 proprietary stores offer the full range of products and services, managing the customer digitally. Moreover, the stores are all powered by 100% renewable energy<sup>4</sup>.

<sup>1</sup> Products (modems, cordless, corded, and repeaters) have a environmental certification which reports the calculation of CO<sub>2</sub> in the use phase. The certification is prepared according to the principles of UNI EN ISO 14021

<sup>2</sup> Reconditioned smartphones and SIM cards with a size reduced by 50% and composed of 60% recycled plastic

<sup>3</sup> Contracted through TIM supplier Service Trade

<sup>4</sup> Energy is covered by certificates of guarantees of origin

<sup>5</sup> Numbers provided by Assurant, TIMFin's partner in trade in services

## SERVICES

### TIM REVALUES SMARTPHONE<sup>5</sup>

By returning their old smartphone customers receive a discount for the purchase of a new one. The old device is regenerated or disposed of in a sustainable way

~9,700

recovered smartphones of which 66% regenerated since 2016

### TIM NEXT<sup>5</sup>

Customers who buy a smartphone in instalments, after one year, can keep or return it. The old device is regenerated or disposed of in a sustainable way

over 215,000

recovered smartphones of which 79% regenerated since 2016

### ADSL SCRAPPING BONUS

By returning their old modem when switching to Fiber, customers receive a bonus of €120. The old modem is regenerated or disposed of in a sustainable way

~1,800

recovered modems of which 42% are regenerated

### ALL RISK SERVICE

Allows the replacement of a smartphone in case of failure or the supply in case of theft or loss

~23,000

regenerated smartphones given as replacement

### E-SIM

Activated online through the Digital Identity Service

~60,000

mobile lines Consumer with E-SIM

# SUSTAINABLE SUPPLY CHAIN

Sustainable development paths with our suppliers to achieve Scope 3 reduction

The achievement of our environmental targets depends greatly on improvement of suppliers' ESG performance and the sustainability we buy, as our Scope 3 emissions account for 85% of the company's total emissions.

### THE SUPPLY CHAIN NUMBERS

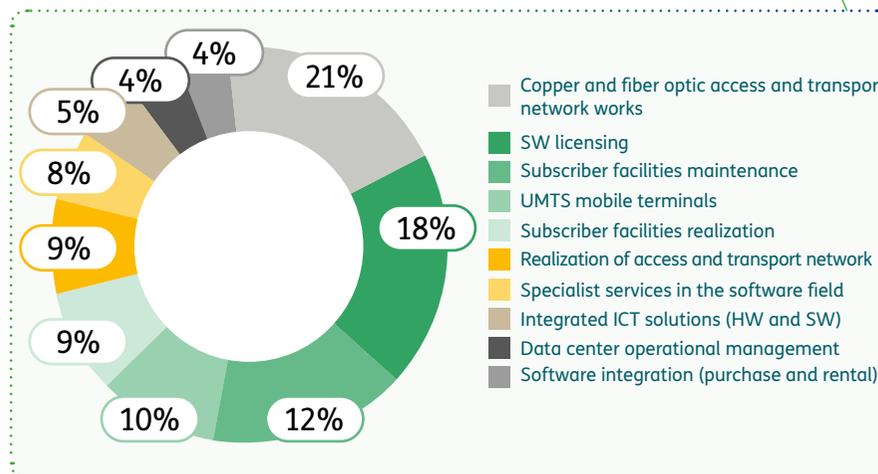
#### ITALY

<b>2,456</b> Total active suppliers <sup>1</sup> (Tier 1)	<b>1,077</b> Significant suppliers <sup>2</sup>	of which Tier 1 Suppliers of which Non Tier 1 Suppliers	<b>792</b> <b>285</b>
% of TIM spending for Tier 1 (significant)			<b>97%</b>

<b>680</b> New Suppliers acquired in 2023	<b>15,067</b> purchase orders <sup>2</sup>	<b>5,610 Mln€</b> value of purchases
--	---	---

<b>515</b> Suppliers with an assessment desk and on site	of which significant	<b>40,3%</b>
<b>79</b> Suppliers with actual/potential negative impacts	of which with corrective actions and improvement plans	<b>100%</b>
	of which supported in the implementation of corrective plans	<b>100%</b>
	cases of exclusion from the supplier register	<b>0%</b>

### TOP 10 PURCHASE CATEGORIES FOR PRODUCTS AND SERVICES



Founding member since 2010



Value Chain Partner dal 2022



<sup>1</sup> Suppliers with order and expected delivery in 2023

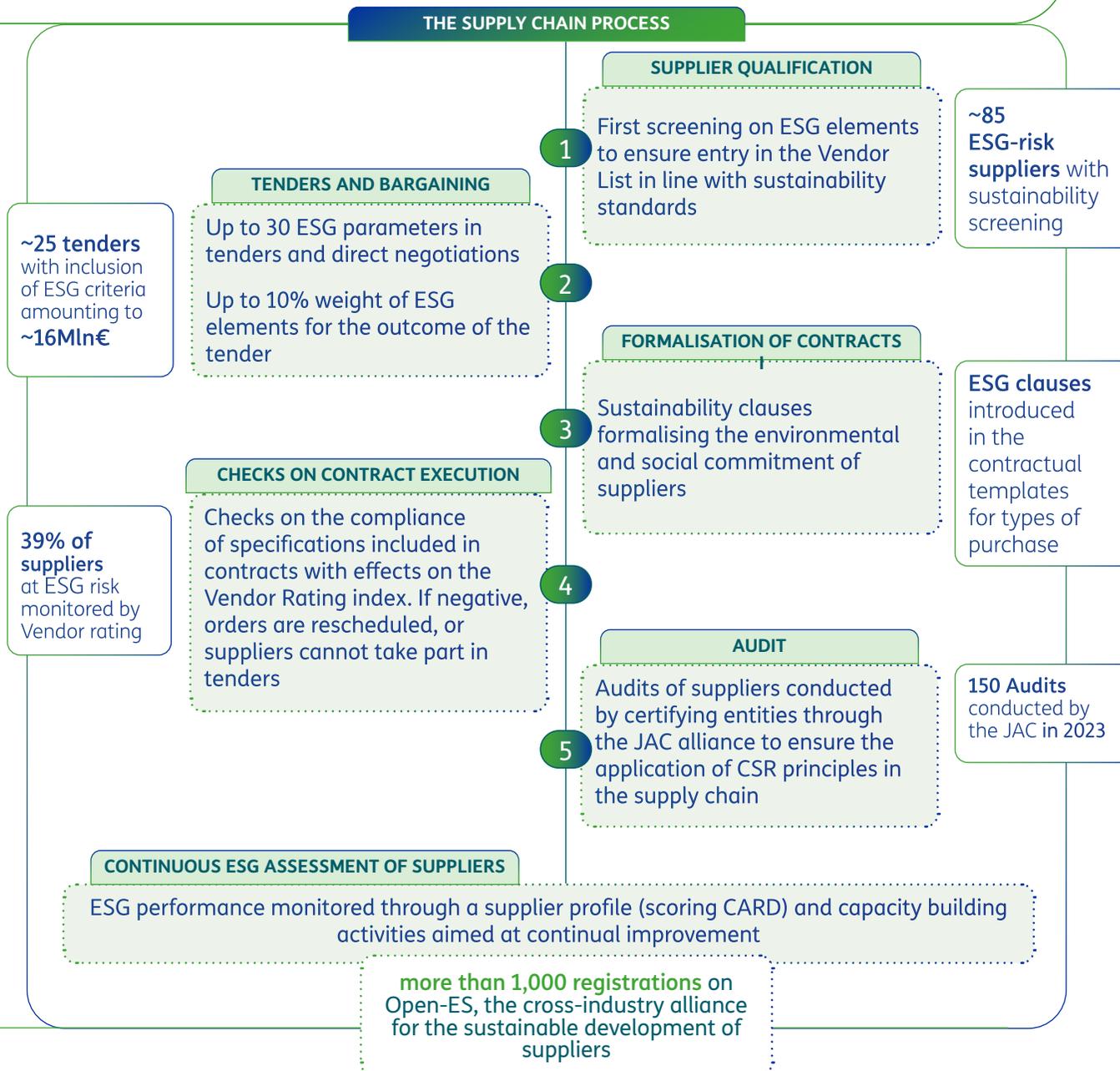
<sup>2</sup> Suppliers with order ≥€500,000 and sustainability risk >€250,000. For the assessment of aspects related to ESG dimensions (environmental, social, and governance), methodologies were adopted based on specific risks related to country, sector, and product/service type

# SUSTAINABLE SUPPLY CHAIN

To make our supply chain sustainable, we introduce ESG control elements in all phases of the procurement process:

- ▶ we define criteria for accessing TIM's supplier register to identify the most relevant partners from an ESG point of view
- ▶ we create ESG assessment paths for suppliers in order to know the impact they determine on the environment and people
- ▶ we define ESG guidelines to direct purchases in tenders and negotiations. ESG KPIs for monitoring are being digitized
- ▶ we help suppliers in their continual improvement on ESG issues, implementing screening and assessment activities to build competencies and take corrective actions where necessary

The process we implement is shared with the Group's Board, through the Committees, and supervised by the Procurement function. Purchasing processes with suppliers are periodically reviewed, ensuring alignment with our Code of Ethics and Conduct.



# EMPLOYEE MOBILITY

We implement solutions to reduce the impact of our journeys

Since 2021, we have been producing the **Home-Work Commuting Plan (PSCL)**, based on a questionnaire to employees that collects data on their commuting habits while offering the opportunity to identify interest in sustainable ways to travel and mobility management initiatives.

Thanks to the inputs from our colleagues, in 2023 we optimised the **shuttle service** for hard-to-reach locations and extended the **carpooling service to new company locations**.

## THE MOBILITY SURVEY: EVIDENCE

### ITALY

We have more than 37,000 TIM employees spread over more than 350 locations in around 200 Italian municipalities.

38.2%  
survey  
responses

 22.5

**Km on average** travelled per day per employee (one way)

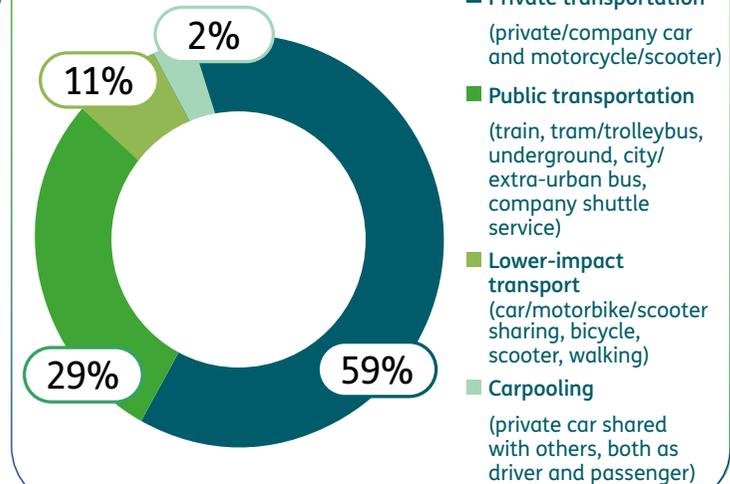
 26,000

**tCO<sub>2</sub>eq** emitted in 1 year for travel

 6,400

**hectares of woodland** needed to offset emissions

### TRANSPORT USED FOR HOME-WORK COMMUTE



# EMPLOYEE MOBILITY

## OFFICES CLOSED ON FRIDAYS

Since 2023, we have been **closing offices every Friday** to reduce consumption and CO<sub>2</sub> emissions

- ▶ Cost savings of ~ 1,000,000€
- ▶ Energy savings of ~ 5 GWh
- ▶ Reduction of ~2,000 tCO<sub>2</sub>eq equal to ~215 car trips around the planet

## CARPOOLING

The Carpooling service makes **commuting smarter and greener** and is available in **Naples, Rome, Florence, Milan and Turin**.

Thanks to the dedicated APP, people with a compatible route can be viewed, car rides booked and expenses shared.

The use of the Service is encouraged by **cashback** campaigns that can be converted into credits for new trips, shopping vouchers or fuel.



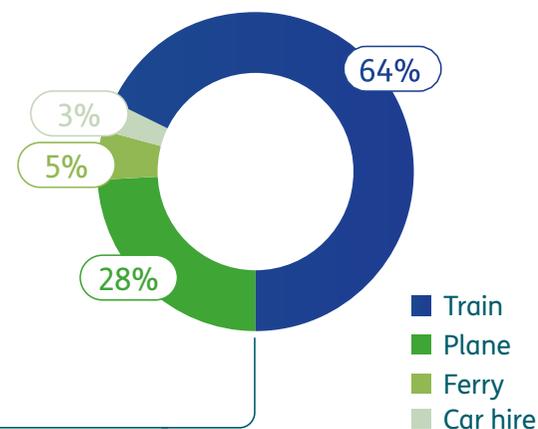
## FOCUS ITALY

## BUSINESS TRIPS

### TRANSFERS



### MEANS OF TRANSPORT USED



# BIODIVERSITY

We collaborate on projects for the preservation of the natural environment

In 2023 we continued to implement projects to safeguard biodiversity.

We planted 540 new plants and shrubs at the **Aguzzano Urban Regional Park in Rome**<sup>1</sup> with the help of 150 TIM colleagues and their families and friends, to contribute to the area and benefit the community. It was an opportunity to spread awareness of respect for the environment also among future generations.

The newly planted trees will contribute to the absorption of around **202 tCO<sub>2</sub>eq** over their **average life cycle of 30 years**.

The initiative guarantees quality in the selection of native trees and shrubs and ensuring their maintenance over time.

<sup>1</sup> The Project is part of the National Forest Italy Campaign of Rete Clima, a non-profit organization, in collaboration with Coldiretti and PEFC Italy and under the Moral Patronage of the Ministry of Ecological Transition and the Ministry of Agricultural, Food and Forestry Policies.

**Less than 1%** of our total Base Stations are located in Environmental Protection Areas or in Permanent Protection Areas.

For the neutralisation of direct GHG emissions, we invest in carbon credits for the conservation and reforestation of land, such as **REDD+** project (Reducing Emissions from Deforestation and Forest Degradation).



**FOCUS ITALY**

**FOCUS BRAZIL**

33

SO  
CI  
AL



# DIGITAL GROWTH

The background is a solid blue color. On the right side, there are several overlapping, semi-transparent rounded rectangles in various shades of blue, creating a layered effect. A thin white line runs horizontally across the bottom of the image.

# DEVELOPMENT OF ICT INFRASTRUCTURES

We strengthen the network and consolidate the data centre ecosystem

Access to digital technology means economic and social inclusion and a boost for the economic growth of companies and the functioning of the Public Administration

## THE ULTRABROADBAND FIXED NETWORK

38 %

FTTH COVERAGE

95.2 %

OF FIXED LINES ENABLED FOR FTTC AND/OR FTTH

## THE ULTRABROADBAND MOBILE NETWORK

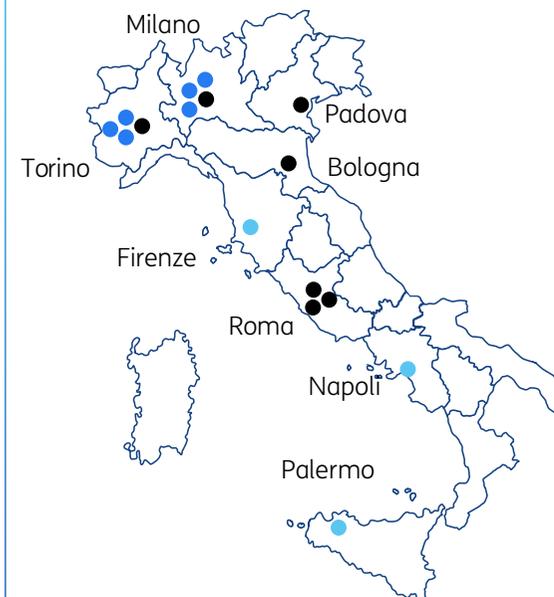
3,294

MUNICIPALITIES COVERED BY 5G

99 %

OF THE POPULATION COVERED BY 4G

## THE DATA CENTRES



7 Data Center Core  
6 Data Center Public Cloud  
3 Services Data Centres

50,000 square meters of systems rooms  
Approximately 58MW available IT power

# DIGITAL SOLUTIONS

For the digital and sustainable development of the Italian economy

## The cloud will lay the foundations for the digital transition

Through the TIM Enterprise division, we act as a leading partner for businesses and the Public Administration, providing services for the efficiency, security and resilience of their operations.

We provide a complete portfolio of **infrastructure cloud services**, encompassing professional management and consulting services and a **multi-cloud offering** created through agreements with major public cloud operators. In particular, through Google, of which we are a Premier Partner, we offer companies end-to-end solutions for cloud migration thanks to a qualified technical team with **over 200 certifications** on all Google Cloud solutions.

**"TIM CLOUD FLEX"** is TIM's "make" offer to provide our customers with tailor-made solutions, including the hybrid cloud, based entirely on **Italian data centres** and managed in an integrated manner via a **single console**.

Flexibility is its strength because it allows configurations of varying complexity: from scenarios with shared resources to mission critical situations with reserved resources, as well as the ability to leverage 2 regions and 4 availability zones with advanced disaster recovery and business continuity tools.

# DIGITAL SOLUTIONS

## Polo Strategico Nazionale, to migrate PA data to an independent and technologically advanced cloud

TIM holds 45% of **Polo Strategico Nazionale (PSN)**, a company in partnership with Leonardo (25%), CDP Equity (20%) and Sogei (10%), to manage **an independent and technologically advanced cloud infrastructure** for the Italian Public Administration.

PSN is one of the pillars of the Italian Cloud Strategy and has the goal, set out in the NRRP, of **at least 280 public administrations using cloud services by 2026**. TIM contributes with **four data centres** operating with the highest security and business continuity standards, 100% powered by renewable energy sources and interconnected

via a VDCN.

The numbers for 2023:

- ▶ **141 CONTRACTS SIGNED WITH PUBLIC ADMINISTRATIONS**
- ▶ **312 AGREEMENTS THROUGH NOTICES DEDICATED TO MISSION 1 OF THE NRRP** of the Department for Digital Transformation. Many other, independent agreements, in addition to those for Mission 1 funds, through other NRRP funds or autonomous funds.



# DIGITAL SOLUTIONS

## 5G and IOT for maximum efficiency in every organisation

5G is the latest generation of mobile communication that, thanks to its high speed, low latency, simultaneous connection management capabilities, allows for the design of solutions based on the IoT (Internet of Things) and other advanced technologies, such as machine learning and artificial intelligence.

This **combination of technologies** plays a key role in digital transformation, enabling greater efficiency, automation and facilitating new opportunities for innovative services and applications in smart cities, Industry 4.0, agritech and digital retail.

**"TIM Urban Genius"** is the smart city offer based on the IoT platform, which collects and analyses territorial data to extract **immediate and timely information** that local administrations can use **in decision-making**.

TIM Urban Genius includes several features that have an impact on the sustainability, including social sustainability, of city life. One example is the possibility of **building urban models** that simulate, for each neighbourhood, the fastest and most sustainable routes that citizens can take on foot, by bicycle or by public transport to reach places of utility and recreation from their homes.



# DIGITAL SOLUTIONS

## Cybersecurity for the defence and resilience of the digital economy

In 2023, **Telsy** - the Group company and competence centre for cybersecurity - acquired **TS-Way** an Italian company specialising in cyber attack prevention and analysis services.

**The first cryptographic microchip made in Italy** was also designed and launched to meet the growing need for security in a wide variety of fields: from mobile devices to smart cities, from cloud infrastructure to IoT to military defence.

**"Check&Support"** is an offer aimed at companies that provides a complete package of IT resilience services and tools at a **fixed monthly price**. The customer gets three services:

- ▶ the measurement of its vulnerability to a cyber attack and a pathway to enhance security;
- ▶ 24/7 technical support in the event of a computer incident;
- ▶ legal insurance cover of up to €15,000, for an unlimited number of claims per year.

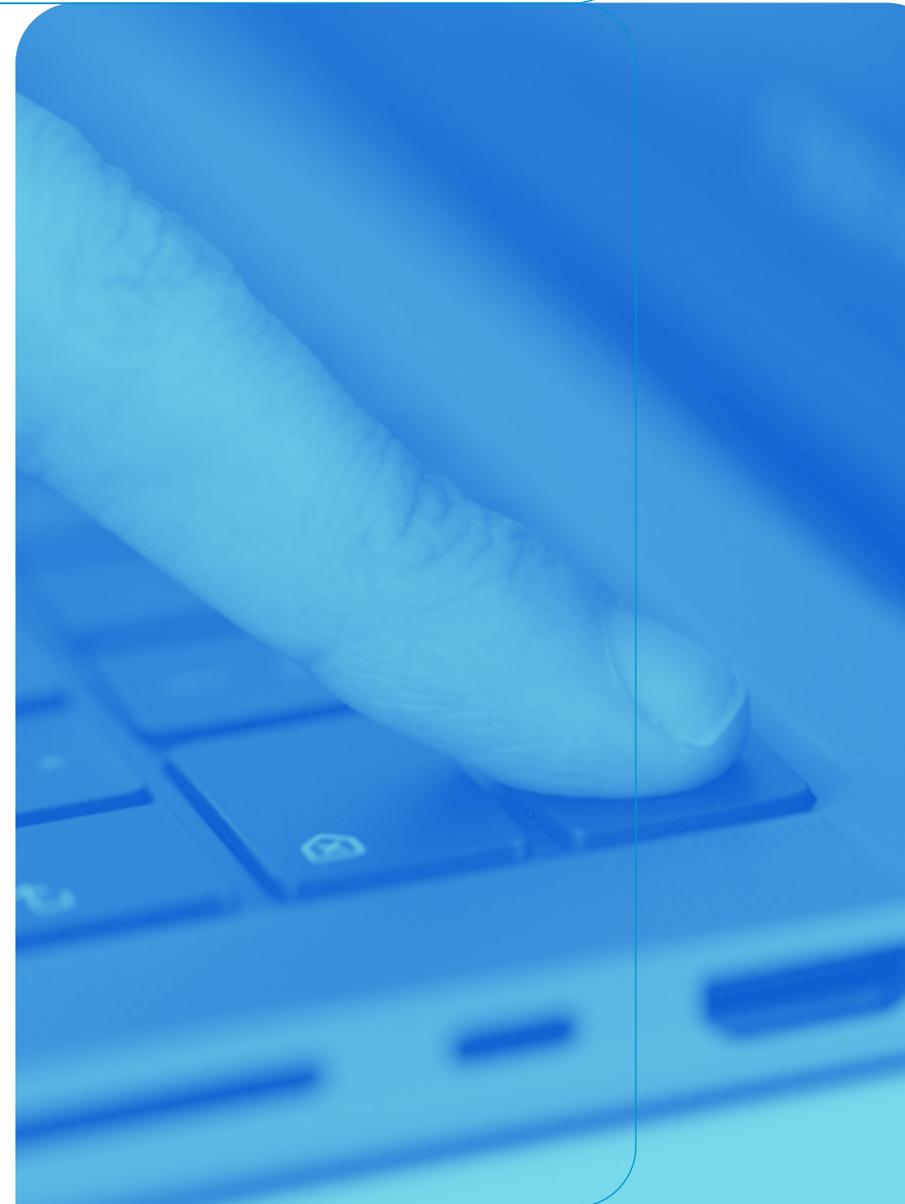
## Identity services and digital validation to streamline bureaucracy

**Trust Technologies** is the Group company operating as a Qualified Trust Service Provider accredited with the Agency for Digital Italy.

Through Trust Technologies, we implement and manage solutions - including SPID, PEC and Digital Signature - that contribute to the progressive dematerialisation of transactions and processes and improve the efficiency of public and private organisations.

### Dematerialisation and regulation-compliant storage services.

With these services, we offer companies and public administrations the digitisation and regulation-compliant storage of archives, with benefits in terms of **paper reduction, sustainability and increased security** in document management. The service is applied in different areas: from the health sector for the management of documentation and reports, to the cultural sector for the preservation of texts of historical value.



# DIGITAL SOLUTIONS

## Digital enhancement of cultural heritage to attract new audiences

We propose management models that use digital tools to increase the engagement of regular visitors and attract new segments of interest.

For Italian museums and archaeological parks, we offer digital solutions ranging from monitoring control rooms (to prevent and manage critical events such as fires, flooding and vandalism) to platforms for end-to-end management of visitor services (ticketing, digital shopping, feedback collection).

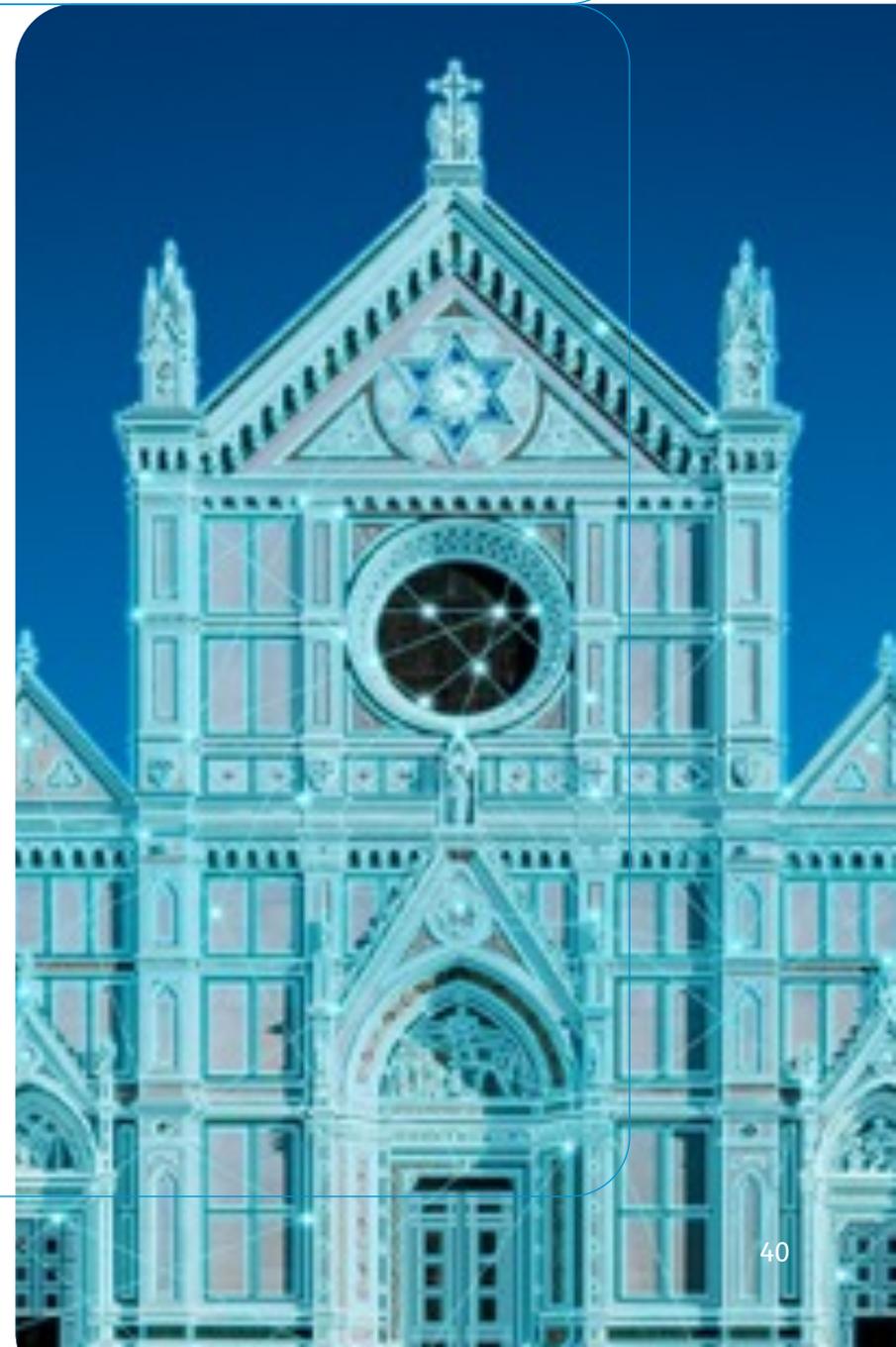
To these management tools, we add services based on state-of-the-art technologies that amplify the value of artistic and cultural assets:

- ▶ **TIM Extended Reality** to create metaverse, augmented and virtual reality through 5G technology
- ▶ **TIM e-Vent Platform** to realise fully digital events with studio shooting of real speakers and their insertion into the digital set design.

### The Basilica of Santa Croce in extended reality

In 2023, in Florence, TIM and the Opera di Santa Croce launched an augmented and immersive reality guided tour inside the monumental complex of Santa Croce.

Visitors have the opportunity to be enthralled by images, animations and 360° videos that enrich the tour, with the viewing of details of the works that are not easily accessible and scenes of life in the Convent that have been lost in time.



# DIGITAL INNOVATION

We increase the value we offer our customers with internal research and external collaborations

## PATENTS

Our portfolio has around

**2,800** PATENTS

## TIM INNOVATION LABS

More than **20** projects managed by our **four TIM Innovation Labs**, also through research activities in collaboration with leading Italian universities, focusing on the evolution of the 5G standard, Open Ran, Edge Cloud, Artificial Intelligence, Quantum Technologies and Optical Technologies

## PARTNERSHIPS

Participation in the **'Restart'** Extended Partnership promoted by the Ministry for Universities and Research for the future of telecommunications in Italy, in the regional Innovation Ecosystems **MUSA** and **Tech4You**, and in the main national **Emerging Technology Bodies** and **Competence Centres**.

## RESEARCH COLLABORATIONS

- ▶ **Research contracts with 5 Italian universities** (University of Turin, Polytechnic of Turin, Scuola Superiore Sant'Anna of Pisa, State University of Milan, University of Catania)
- ▶ **30 PhD scholarships** funded at several universities nationwide
- ▶ **16 European research projects** (programmi Horizon 2020, Horizon Future, DEP-Digital European Platform, CEF-Connected European Facilities)
- ▶ **1 five-year cooperation agreement with the CNR** (Italy's National Research Council) for scientific and project research on smart city services;

## TIM VENTURES

With the TIM Group's venture capital company, we made direct and indirect investments of **10 Mln€** in start-ups and SMEs in 2023.

## TIM GROWTH PLATFORM

**TIM Growth Platform**, the programme for scouting and identifying innovative solutions involving more than 900 Italian and international SMEs, start-ups and scale-ups, was launched in 2023.

In the course of the year, two challenges were opened:

- ▶ the **TIM Cybersecurity Made in Italy Challenge**, with over 50 companies, to complement Telsy's cyber services offering
- ▶ the **TIM AI Challenge**, with over 160 start-ups, scale-ups and innovative companies to enhance the TIM Enterprise service portfolio with Artificial Intelligence solutions

and **15 collaborations** with top innovative companies were started.

# TIM PEOPLE



# VALUE OF OUR PEOPLE

We build the future by enhancing experience and increasing skills to be more competitive

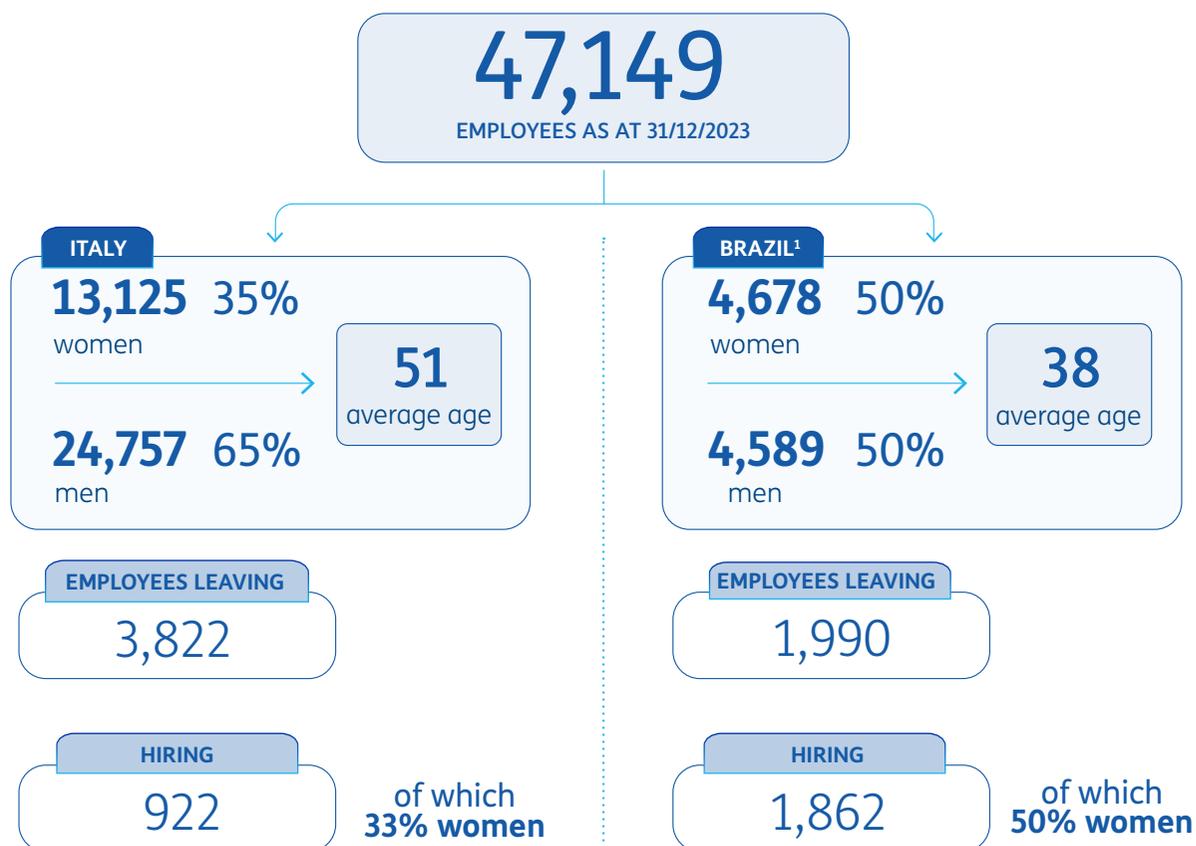
## TIM PEOPLE

The implementation of the 24-26 Plan has led to the establishment of a new division with the relocation of more than 20,000 people. This is a great moment of organisational transformation in the company that will lead to a reorganization in the work management.

In this context, the Expansion Contract, signed in August 2022 and ending in 2024, continued, with the aim of retraining existing skills and encouraging recruitment of new professional profiles.

The contract resulted in:

- ▶ a [reduction in working hours](#) for about 30,000 workers, with the payment of an extraordinary wage supplement
- ▶ a [training and retraining programme](#)
- ▶ a [voluntary pre-retirement plan](#)
- ▶ a [recruitment campaign](#) focused on key skills



<sup>1</sup>For Brazil, the data presented does not consider expats, interns and young apprentices

# TRAINING AND RETRAINING PLAN

## FOCUS ITALY

We customise training needs to meet new ICT market challenges

Thanks to the "Apprendo" project, employees were able to compose their training plan drawing from over 170 titles in the catalogue.

The catalogue is structured on **four areas of competence**, designed to meet specific training and retraining needs.

For each competence area, several thematic training areas have been identified, which include related content to facilitate the identification of topics of interest.

Finally, for each subject area, there is a detailed list of training courses.

Employees had the opportunity to customise their path according to their needs and professional goals, reserving a minimum number of days for courses included in the 'Technology' and 'Professionalisation' areas, in addition to the compulsory courses required by law.

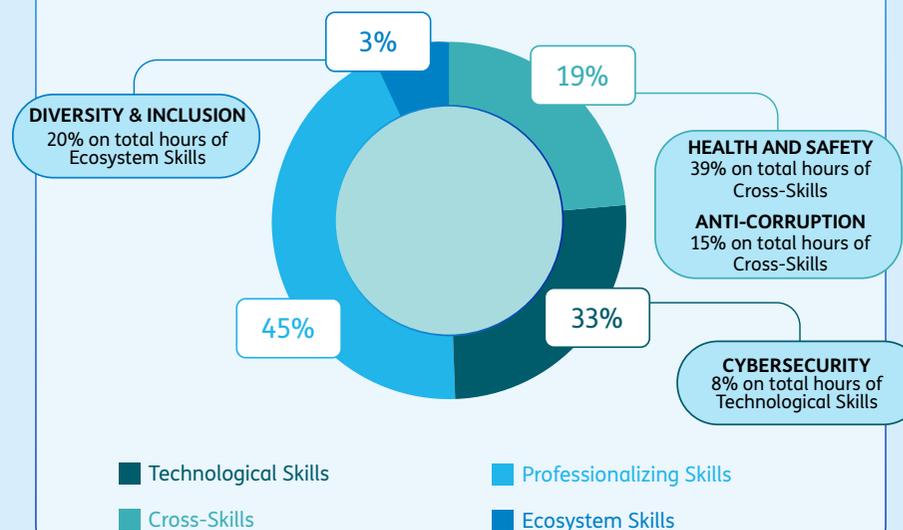
Approximately **4,000 people** have supplemented their training plan with additional courses than those provided.

### HOURS OF TRAINING PROVIDED BY TYPE OF COMPETENCE IN 2023

**1.35** Mln hours OF TOTAL TRAINING

**95%** of employees trained IN ESG SKILLS

**35** hours OF TRAINING PER CAPITA  
→ **5** hours ON THE MAIN ESG ISSUES



# TRAINING AND RETRAINING PLAN

## FOCUS BRAZIL

### 2023 KEY NUMBERS

# 42

average training hours per capita

# 10

BRL million, expenditure on training and education programmes

# 99%

of employees trained in ESG skills <sup>1</sup>

# 6,040

employees trained in digital skills <sup>2</sup>

<sup>1</sup> ESG skills include four courses: Combating sexual and moral harassment and bullying; Environmental management; Phishing prevention; Sustainability

<sup>2</sup> Digital skills include courses such as Agile Methodologies, 5G, Data Thinking and Digital Mindset

### MAIN INITIATIVES

- ▶ **Conecta:** onboarding to integrate and involve new employees
- ▶ **Internships and Apprenticeships:** to develop technical and behavioural skills (training, workshops, lectures, online courses, technical visits, internal mentoring and others)
- ▶ **Institutional training:** to integrate employees into TIM's corporate policies and culture and contribute to a better environment within the Company
- ▶ **Specific technical training:** to create a focus on qualification and technical updating and to develop new skills
- ▶ **Cross-training:** to create a shared culture
- ▶ **TIM Talks:** TIM's annual Training, Development and Communication programme, with the participation of internal audiences including members of the Board of Directors, and the external public. The 2023 programme was focused on the power of innovation and technology in strengthening the ESG strategy. It counted more than 13,000 participations internal and 200,000 external participations/displays

# TRAINING IN SCHOOLS

We go beyond company boundaries to reduce the gap between the skills required and those available on the labour market

## PERMANENT COLLABORATIONS WITH EDUCATIONAL INSTITUTIONS

### ITS Maria Gaetana Agnesi

We are one of the founding members of the Higher Technological Institute that trains Data Analysts and Digital Transformation Specialists with a two-year course consisting of theoretical training and internships in companies.

### Digital High Schools

From September 2023, we implemented an experimentation with the Institute of Higher Education of Gaeta for the realisation of a digital high school, the second in Italy and the first with a TELCO, to provide know-how on themes of digital transformation and favour the development of new professions.

## 2023 INITIATIVES

### PERMANENT OBSERVATORY FOR YOUNG PEOPLE - PUBLISHERS

Partnership with *OPGE* since 2019 with a Technology Digital Literacy project for secondary school students and teachers

In the 22-23 academic year

**+300** schools  
over **300** teachers

**+2,700** registered classes  
**71,000** classes involved

### PROFESSIONS 4.0

TIM professionals addressing topics such as: fiber optics and the applications of 5G in Industry 4.0 with a focus on Smart Cities, Machine Learning and Artificial Intelligence

over **240** students      **4** technical institutes: Pontedera, Barletta, Taranto and Latina

### APPOINTMENT WITH DIGITAL MEDIA

Collaboration with the Italian Digital Media Observatory (IDMO) to support digital and media literacy for students and teachers

**4** cycles  
**60** institutes

over **16,600** participants live and on-demand

### 5G SMART SCHOOL

In the 2022-2023 academic year, in partnership with Qualcomm and WeSchool, we provided 5G connectivity, PCs and virtual reality viewers to support students' innovative learning journey

**5** schools in small and medium-sized towns      **2,000** students' and over **100** teachers

# DEVELOPMENT PATHS

We support different careers by enhancing motivation and talent

Our development model is based on a global and dynamic view of the individual and uses a number of tools that assess motivation, knowledge, skills, potential and performance.

We also have development plans dedicated to specific categories such as young people under 35.

- ▶ **U35 initiatives:** initiatives dedicated to the under-35s to meet their needs for professional and personal growth and development;  
around 2,000 participants
- ▶ **Skill Assessment:** identifies the knowledge and skills possessed in order to guide upskilling and reskilling initiatives;  
around 724 participants
- ▶ **Potential Assessment:** supports talent management and management development paths;  
around 303 participants
- ▶ **Work Drivers Map:** investigates motivation and professional spendability in an integrated way in order to build customised development paths;  
around 36,825 participants
- ▶ **Performance Management:** assesses, from year to year, the performance and behaviour of the entire corporate population;  
around 40,163 participants

# WELL-BEING OF OUR PEOPLE

We create the conditions to increase the well-being of our people

In 2023, we confirmed all major initiatives aimed at the physical, psychological and social well-being of our employees and their families, with a view to creating a good corporate climate, which also has a positive impact on productivity and attendance.

## PEOPLE CARING INITIATIVES IN 2023

### FOR EMPLOYEES



#### MOVEMENT AND PHYSICAL ACTIVITY

Partnership with Gympass for access to over **2,200** sports centres at subsidised costs. More than **2,300** subscriptions activated. **14,000 people enrolled** in free programmes.

#### PREVENTION

Information brochures on the prevention of certain diseases and on healthy lifestyles.

#### STRESS REDUCTION

'Sentieri di Resilienza' psychological support, with a package of 8 free online meetings and up to 20 optional meetings at a reduced rate. 4 webinars on managing energy levels, managing emotions, planning for the future and 2 e-learning paths for wellness of the mind and spirit. **300** people benefited from the training courses and **89** psychological support courses were completed.

#### TIM MY HEALTH

Free medical care policy for all employees providing comprehensive health care for the whole family, with a telemedicine service, the support of an online doctor always available, issuing of prescriptions and home delivery of medicines.

### FOR FAMILIES



#### TIM STUDIO

Study assistance to consolidate the learning of employees' children and grandchildren, implemented with ALATEL, the association of TIM Group retirees and workers. **70** children benefited from the service.

#### MIO RIMBORSO

The reimbursement of expenses incurred for day-care, nursery or baby-sitting services. Approximately **1,200** applications accepted.

#### TIM ESTATE

Fifteen-day summer holidays offered to employees' children (under '18s). More than **2,600** children and young people participated.

#### INTERCULTURAL SCHOLARSHIPS

**18** TIM scholarships for employees' children to enjoy a learning experience abroad.

#### SUBSIDIES

Free disbursements to support employees in difficult situations, such as serious illness.

# SMART WORKING

We implement a working model that integrates productivity, well-being and sustainability

The application of Smart working<sup>1</sup> continues for a better work-life balance. The new agreement, in force from February 2023 to February 2024, envisages a switch from 2 to 3 Smart working days, and provides the closure of offices on Fridays.

The choice to join is voluntary to protect the specific personal situations.

In 2023, the **adoption rate was 96% of those eligible.**

The adoption rate of Smart working has been particularly relevant in large cities such as Rome (8,770 employees) and Milan (2,620 employees), with a **reduction in commuting by 60%.**

<sup>1</sup>Smart working refers to the working method adopted by the Group to ensure flexibility in work performance (also in terms of working hours) and to enable people to work from home

## SMART WORKING IN 2023

approximately **27,300** employees involved

**90** days per capita of Smart working thanks to our organisational model



**42,400** tCO<sub>2</sub>eq avoided<sup>2</sup>



**5,900** laps of the planet by car



**82,700** tree absorbing CO<sub>2</sub> for 30 years of life

<sup>2</sup>For the calculation, the following data were used: number of employees, number of days the offices were opened, number of Smart working days, utility data (electricity, methane gas, diesel, water, cleaning services), home-work mobility of employees (results of an internal survey). The calculation was performed by Rete Clima, a non-profit organisation specialising in the promotion of sustainability in organisations, using emission factors from the Ecoinvent 3.9

### TIM ENTERPRISE TRIAL

From September 2023 until February 2024, 1,000 TIM Enterprise customer service employees tested the Smart working mode for almost 100%. Only two presences in the office per month, every 15 days, to encourage dialogue and sharing with colleagues.

**FOCUS ITALY**

# INCLUSION

We give voice and value to everyone, in respect of each identity

4WEEKS4INCLUSION 12 OCTOBER - 14 NOVEMBER 2023

Our inclusion plan starts by collecting the needs of colleagues and aims at enhancing the uniqueness of each individual, ensuring the flexibility and customisation of each corporate initiative, policy or project. The main areas of action include:

- ▶ disability
- ▶ sexual orientation and gender identity
- ▶ ethnicity and religion

We are also actively committed to promoting an inclusive culture both within and outside our organisation.

Every year, we organise numerous events aimed at spreading inclusion issues, also with the active contribution of employees.

The most popular initiative is **4Weeks4Inclusion**, an inter-company marathon organised by TIM for the fourth consecutive year.

Over **600 hours** live

**300** events

Over **1,000** guests

Including managers from leading Italian companies, artists, journalists, cultural representatives and influencers

**25,000** social interactions

Over **4 Mln** views

This year's title was **'Anatomy of Inclusion'** with the aim of making an in-depth analysis of the very essence of diversity.

The body, often considered the ultimate outward expression of diversity, is only part of the story; it is our identity that really differentiates us from others.

Starting from the knowledge that what is unknown is **frightening, we have welcomed, known and accepted diversity** with the aim of integrating and enhancing it.



**FOCUS ITALY**

# INCLUSION

## Disability

Over **1,100 of our colleagues** (3% of the workforce) **have a disability**.

For them, we have made available: **awareness-raising and training on dyslexia**; additional technological equipment for deaf colleagues in the company with the **"Sordi Inclusi" programme**; specific IT equipment for each person with a disability with the **"Nessuno Escluso" project**.

In the Diversity Brand Summit 2023, TIM received the "Digital" award with the "TIMVISION Ascolta" project, which allows blind and visually impaired children to watch cartoons thanks to audiodescriptions.

ITALY

## Sexual orientation and gender identity

We were among the first Italian companies to provide **specific inclusion programmes** for LGBT people.

In our extended family vision, we offer cohabiting partners **all the benefits** provided for the family unit, regardless of gender or blood ties. Therefore, we also give homosexual families and their children access to company caring services.

For colleagues undergoing gender transition, we **recognise the identity** felt as their own before the decision and prepare the work environment for their transition.

## Ethnicity and religion

Although less than 1% of the employees belong to an ethnic group and/or religion different from that prevailing in the country, we keep this in mind in our actions.

In 2022, a policy was published that gives people practising a religion other than Catholicism, the possibility to celebrate religious holidays in accordance with their creed, with ad hoc leave granted, and to organise moments of worship in company workplaces.

BRAZIL

We carry out several initiatives with the aim of hiring, developing and retaining people with disabilities in the company.

Continuous **communication and awareness-raising** actions are also carried out to avoid discrimination against people with disabilities and ensure equal opportunities.

In Brazil we are the only Telco to have received the **Equality BR** award, which recognises our commitment to LGBTI+ people, with our projects targeting both employees and society.

TIM Brasil is listed on **IDIVERSA B3**, the first Brazilian stock market index that considers gender and race criteria to select companies in its portfolio.

Over **41%** of the TIM workforce are black people. In addition to hiring them systematically, we aim to hire about 50% of them in our apprenticeship and trainee programmes.

In 2023, we launched the **TIM Perolas Negras** ('Black Pearls') programme to support the career path of **25%** of the approximately **4,000** black employees in the company.

# GENDER EQUALITY

We believe in gender equality and act to achieve it

We do our part by acting inside and outside the company.

In 2023, we established the **Gender Equality Steering Committee** to adopt and implement gender equality and to monitor the progress of related ESG Plan targets.

We have also obtained **Gender Equality Certification (UNI/PdR 125:2022)** of the organisation's compliance with the gender equality management system.

We expose ourselves outside the company by declaring our vision with institutional campaigns that create awareness on the topic and choosing commercial testimonials that can be an inspiration to all women.

At the same time, we put in place initiatives that support women in the labour market and offer them a reference point in case of difficult situations.



## THE AWARENESS CAMPAIGN

This campaign reminds us that the gender gap is in every area, and makes everyone aware that they can do something because **'equality cannot wait'**

**FOCUS ITALY**

# GENDER EQUALITY

## Initiatives for society

In October 2023, we launched the **Women Plus** app, which supports women in their search for a job by facilitating the matching of supply and demand through an algorithm for lining up available skills with jobs.

The project is promoted together with **Women at Business**, an alliance of technological, and institutional partners from the Third Sector and Employment Agencies.



Thanks to a partnership with DonnexStrada, the **over 200 TIM-owned stores** have become '**Punti Viola**', safe places where trained sales staff provide initial assistance or useful information to those people, particularly women, who feel unsafe or suffer violence.



Since 2010 we have been a partner of **Valore D**, the first association in Italy, with **over 330 companies**, pioneering the promotion of gender equity and the dissemination of an inclusive culture. Valore D provides know-how and effective tools for the Diversity, Equity and Inclusion strategy, offers opportunities for inter-company comparisons and is a reference partner for institutions.

**valore<sup>D</sup>**

**FOCUS ITALY**

Since July 2021, we have partnered with **Mulheres Positivas**, a social project that promotes the **employability** and **empowerment** of Brazilian women, through a digital platform, accessible via app. Thanks to TIM Brasil subscription, the initiative has grown into an inter-company programme with over 200 signatory companies and more than 8,000 job opportunities available.

As of 2023, the app has two new features to **protect and support** women in dangerous situations:

- ▶ reporting incidents of violence experienced personally or witnessed
- ▶ 'Caminho Delas', which marks out areas with a high incidence of violence and enables the selection of the safest routes

In addition, since October 2023, a number of **TIM shops** have become **points of reference for women in distress**, safe spaces where those who feel in danger can turn for information and support.

**+200**

PARTICIPATING  
COMPANIES

**+300**

COURSES

**+8,000**

JOB  
OPPORTUNITIES

**FOCUS BRAZIL**

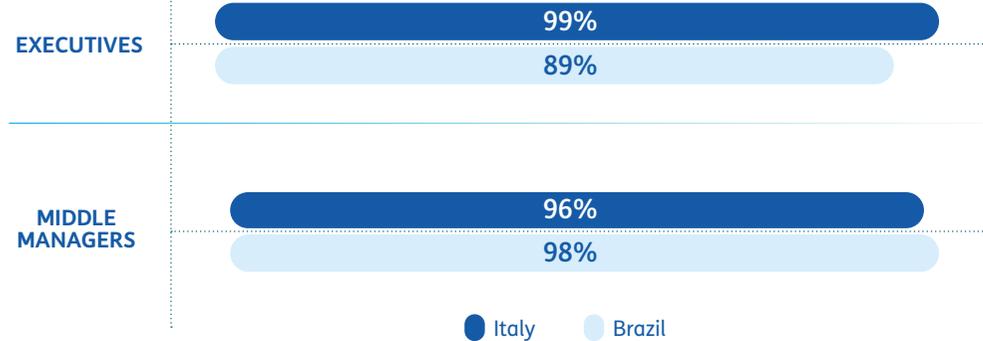
# GENDER EQUALITY

## Overcoming the gender gap in our company

We counteract the gender gap with a plan target on female managerial positions **≥ 29% by 2025**, also included in the short-term incentive scheme (MBO), as well as with a target in the long-term incentive plan (LTI) for the reduction of the pay gap for middle managers in positions of responsibility (the pay gap for executives has already been cancelled).

### GENDER PAY GAP NUMBERS

#### RATIO (%) BETWEEN WOMEN'S AND MEN'S BASIC SALARY (RAL) BY CATEGORY



### GENDER GAP NUMBERS

	ITALY			BRAZIL			GROUP		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
% WOMEN	35%	35%	35%	50%	51%	50%	38%	38%	38%
% WOMEN IN LEADERSHIP POSITION <sup>1</sup>	22%	24%	25%	32 <sup>2</sup> %	34%	36%	25%	28%	30%
% WOMEN IN THE BOARDS OF GROUP COMPANIES <sup>3</sup>	23%	47 <sup>4</sup> %	48%	29%	29%	31%	23%	43%	45%

<sup>1</sup> Ratio of women in positions of responsibility to total positions of responsibility. Considering Italian and Brazilian managers and directors

<sup>2</sup> The percentage differs from that used in TIM Brasil DNF as it considers only leadership positions in the company's organisation chart in alignment to the Group's calculation perimeter

<sup>3</sup> Excluding the Board of Directors of the Parent Company. For Brazil, the 2021 and 2022 percentages have been adjusted considering the companies TIM BRASIL SERVICOS E PARTICIP. SA and TIM SA

<sup>4</sup> 2022 data (45%) has been adjusted for the exclusion of Noovle International and Noovle Malta from the area of calculation

# HEALTH AND SAFETY PROTECTION

We apply the highest standards and pursue continuous improvement of our management model

## HEALTH AND SAFETY PROFILE

Our **Safety Management Model** follows the main recognised standards (UNI ISO 45001) and is applied to all processes related to offices and mixed-use buildings.

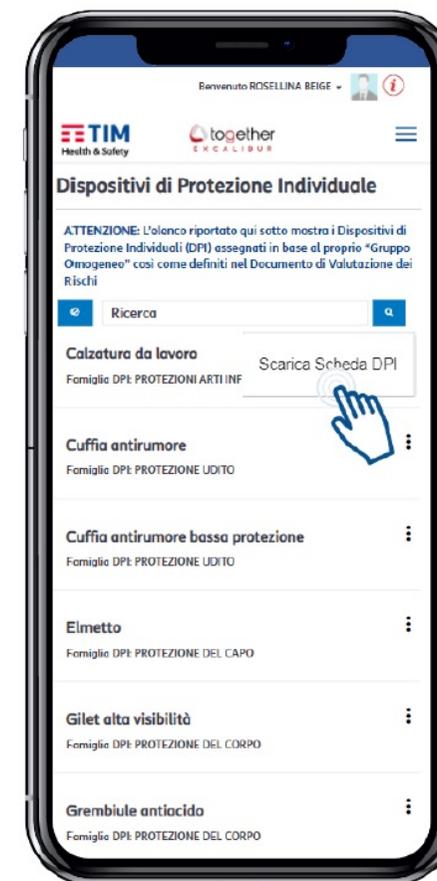
In addition to the specific policy that contains the principles and guidelines for safety management, we have set up a **Safety Steering Committee**, chaired by the Chief Executive Officer, with the aim of:

- ▶ ensuring the Management System complies with relevant standards
- ▶ promoting integration among the different business functions
- ▶ reporting on the performance of the Management System and sharing improvement measures

In addition to compulsory activities, information and awareness-raising campaigns aimed at all staff continued in 2023.

For each employee on the company intranet there is a real 'identity card' of the risk profile of their job description with all the information necessary for the safe performance of the activity.

For employees belonging to certain specific risk categories, it is possible to view the personal protective equipment and the list of all protocols to be observed.



# ACTIVITIES IN THE SOCIAL FIELD

The background is a dark blue gradient. On the right side, there are several horizontal bars of varying lengths and shades of blue, some with rounded ends. A thin white vertical line runs down the right side of the page, starting from the top and ending near the bottom.

# COLLABORATION WITH INSTITUTIONS

We cooperate with institutions and associations

We work together with the **Civil Protection Department and all national and local institutions, State administrations, the Armed Forces, private companies, research centres and local communities** with the aim of protecting human lives, settlements, animals, artistic heritage and the environment, both in situations of disasters and emergencies and major events such as concerts.

In the event of natural disasters, thanks to 24-hours monitoring of infrastructure, we define intervention priorities related to the impact on the population, essential services and indications from the Civil Protection and local authorities.

We ensure rapid **Coast Guard** intervention through our operational hubs in Rome and Palermo, with a team of over 130 professionals dedicated to ensuring the full operability of radio maritime and satellite services to support safe navigation.

## FLOODING IN EMILIA ROMAGNA

On the night of 1 May 2023, after four months of drought, **350 million cubic metres of water fell in a short time on an area of 100 municipalities**

**900**

**TIM EMPLOYEES** worked to restore the full functionality of communications as quickly as possible

**500**  
VEHICLES

**70**  
EQUIPPED VANS

**20**  
VEHICLES equipped with radio stations and mobile power stations with emergency power generators

## FLOODING IN TUSCANY

On 4 November 2023, torrential rains devastated parts of Tuscany.

All TIM staff in the area worked to ensure the operation of power stations with generator sets, rebuild radio base stations and repair faults that isolated entire areas.

**30,000** FIXED  
NETWORK DISRUPTIONS  
RESOLVED

**70** BASIC RADIO STATIONS  
that were restarted



# SOLIDARITY FUNDRAISING

We are an active part of the solidarity chain

For more than 20 years, we have been collecting **solidarity funds** via text messages and landline calls to support humanitarian, scientific, social and environmental protection projects of third sector organisations, as well as those in favour of national and international emergencies sponsored by the Civil Protection.

We offer the possibility of making donations via text message worth 2 euros and calls from a landline to a dedicated number worth 5 euros or 10 euros and then transferring the donated amounts in full to the sponsoring organisations.

## TOTAL AMOUNT COLLECTED

over

8

Mln€



19%  
from mobile

81%  
from fixed

## TOTAL NUMBER OF DONATIONS

approximately

1.7

Mln of  
donation



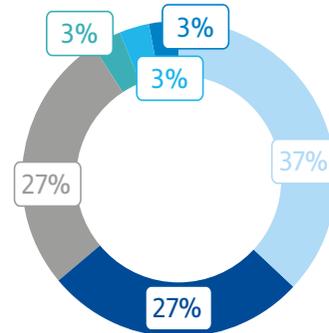
45%  
from mobile

55%  
from fixed

## MAIN PROMOTERS OF THE THIRD SECTOR



## DONATION AREAS



- Scientific Research and Assistance Medical, Surgical and Healthcare
- People Protection (Women, Minors, the Elderly, etc.)
- Social and Food Protection and Assistance
- Animal and Environmental Protection
- Education Prevention and Social Integration
- Humanitarian emergencies

\*By amounts collected and number of donations

# FOUNDATIONS AND ASSOCIATIONS

We finance and support community projects

## FONDAZIONE TIM

In 2023 we have confirmed all major initiatives aimed at the physical, psychological and social well-being of our employees and their families, with a view to creating a good corporate climate, which also has a positive impact on productivity and attendance.

### CALL FOR IDEAS 2023

With the Call for IDEAs 2023, Fondazione TIM has made available over **2 million euros** in total, equally divided among the areas in which it operates - Social Inclusion, Art and Culture, Scientific Research and Education - giving the opportunity to philanthropic entities, private and public foundations, recognised associations, social promotion associations, non-profit social cooperatives, voluntary organisations, universities, religious institutions and public organisations, to present ideas and proposals with a wide, medium-to-long-term vision, with the active involvement of relative communities, using technology as a distinctive element for responsible and sustainable innovation. **9 projects** were selected through several evaluation steps, three for each area, from the almost **500 proposals received**. There was an extraordinary turnout, testifying to a remarkable wealth of ideas in all three sectors, a dynamic planning and proactive approach from all over Italy.

### Donations

- ▶ **60,000 euros** for the Biomedical University Foundation with the aim to establish a fund intitled to 'Joaquin Navarro-Valls Scholarship' to support deserving students with financial difficulties in the Bioemmedical Engineering and Intelligent Systems Engineering degree courses
- ▶ **300,000 euros** in favour of the Municipality of Faenza for the restructuring the 'Pirazzini Primary School', which was affected by the floods in Emilia-Romagna in May 2023.



# FOUNDATIONS AND ASSOCIATIONS

## INSTITUTO TIM

The Instituto TIM ('TIM Institute') promotes the social inclusion of children and adolescents through educational and social programmes in Brazil. Since 2013, **more than 700,000 people** in all 26 Brazilian states and the Federal District have been involved.

In 2023, Instituto TIM celebrated its 10th year with the launch of the 'Fortalecendo Redes' (Strengthening Networks) project, in partnership with **Gerando Falcões**, a recognised Brazilian institution that fights poverty and promotes social, human and economic development in the country. The main goal of the initiative is the institutional strengthening of civil society organisations (NGOs) that are part of the Gerando Falcões Network, which operates in more than 5,000 communities across the country.

In 2023, the Bateria do Instituto TIM (TIM Institute Music band) continued its significant participation in the city's cultural scene, taking part in the opening of the **TIM Music Noites Cariocas** festival, where it opened the evening of the famous Gilberto Gil, in the presence of Culture Minister Margareth Menezes. It also opened **TIM Music Rio**, Brazil's largest free music festival.



# FOUNDATIONS AND ASSOCIATIONS

## The Olivetti Historical Archives Association

Since 1998, we have been collaborating with public and private organisations alongside the Olivetti Historical Archives Association to organise exhibitions, conferences, cultural projects and publications. We preserve and manage a unique documentary heritage, constantly enhanced by an innovative and digital dissemination approach, indispensable to reach the new generations and an international target audience.

Among the activities that marked 2023 for the Association, was the exhibition 'The History of Olivetti', organised with the Lazio Region in Rome; '**Olivetti. Beyond the Typewriter**', curated in Israel alongside the Italian Cultural Institute in Tel Aviv, and '**Olivetti en Mexico**', designed with Turin Polytechnic, in Mexico City.

In 2024, the cycle '**Olivetti and culture in responsible business**', with 6 exhibitions at the Pier Alessandro Garda Civic Museum in Ivrea, which was inaugurated in 2021, will come to an end. The Olivetti Historical Archives Association was also among the promoters of the Unesco accreditation 'Ivrea Città Industriale del XX Secolo' (2018) and Ivrea Capitale Italiana del Libro (2022).



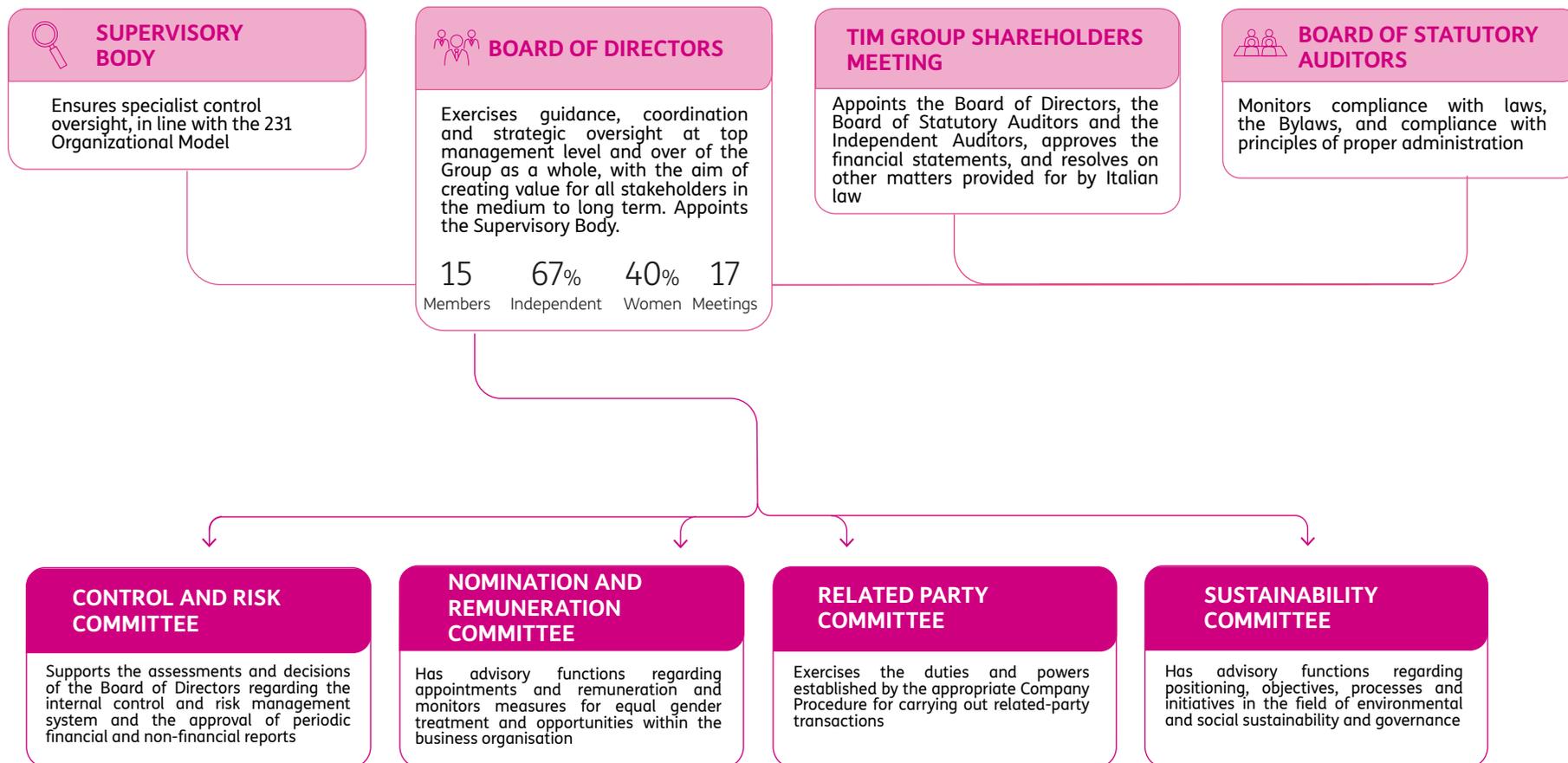


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# CORPORATE GOVERNANCE STRUCTURE

Our corporate governance system to minimize risks and create value



# CORPORATE GOVERNANCE STRUCTURE

The Board of Directors in its activities is supported by four **Board Committees with advisory, proposal-making, monitoring and investigative functions**: the Control and Risk Committee, the Nomination and Remuneration Committee, the Related-Parties Committee and the Sustainability Committee. Each Committee has its own regulations that describe the composition and methods of appointment of the members and operating rules.

The Sustainability Committee, established in 2021, oversees the Group's positioning, objectives, processes and initiatives regarding social and environmental sustainability and governance (ESG), interacting with:

- ▶ the Nomination and Remuneration Committee, to include ESG targets in the remuneration policy and to adopt measures for equal gender treatment and opportunities;

- ▶ the Control and Risks Committee, for the preliminary procedures of non-financial statement and analysis of ESG business risks.

As regards operational management in Italy, the **Sustainability Department** defines, together with other Company Departments, the ESG targets for the Business Plan, identifies the sustainability initiatives to support the Plan, draws up the non-financial statement and oversees the sustainability ratings in coordination with the CFO.

Within the Group, **TIM Brasil also has its own governance structure with four Board Committees** to support the Board of Directors.

Sustainability issues are managed by a Sustainability Department and at a strategic level by the ESG Committee that interacts with the Remuneration Committee and the Control and Risks Committee.

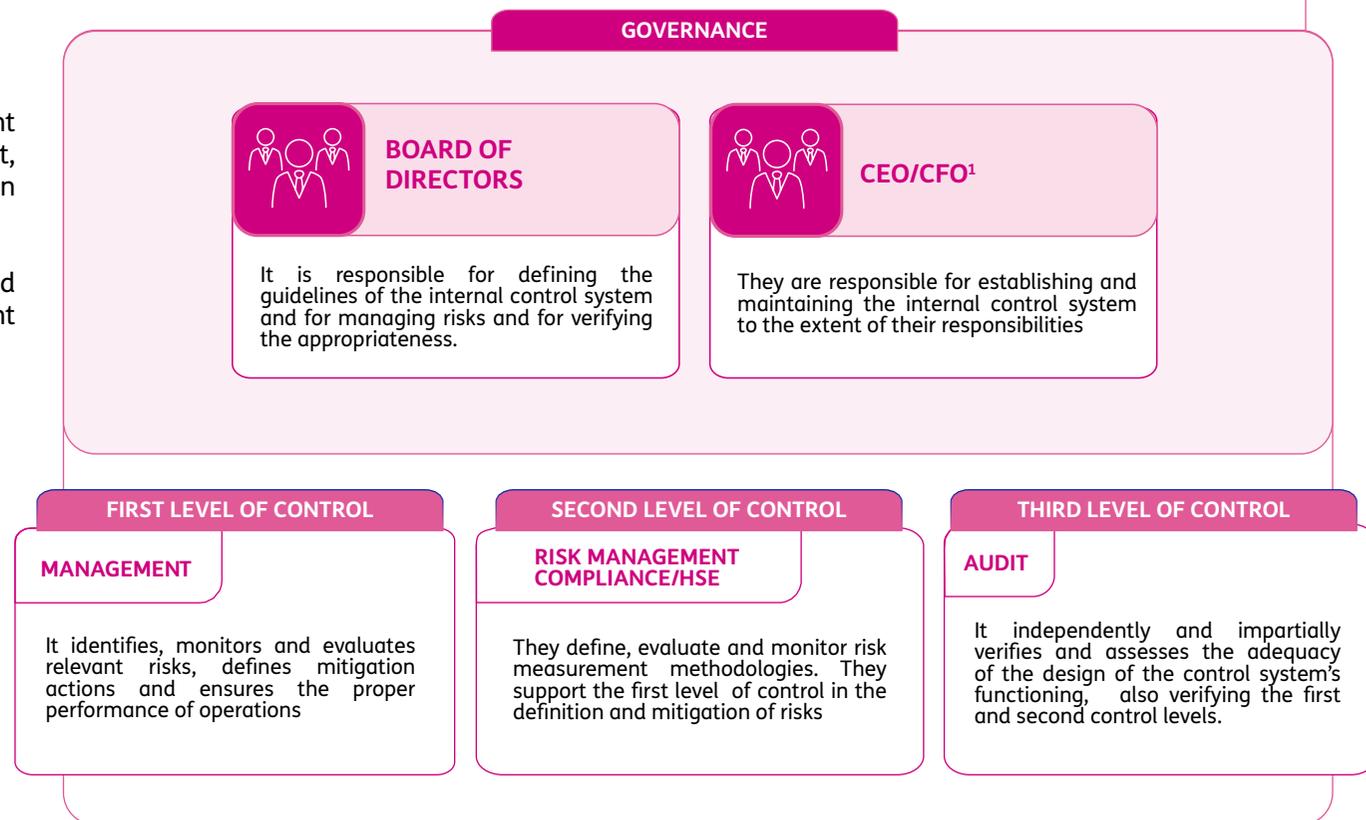


# INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

We monitor compliance with the rules for the proper management of the business

The internal control and risk management system ensures the identification, measurement, management and monitoring of the main business risks within the Group.

It is structured into three levels of control and is applied at a Group level, taking into account specific, individual operational aspects.



<sup>1</sup>The CFO is involved as a manager responsible for drafting the Company's accounting documents

# INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

In addition to the organizational structures, the Group's internal control and risk management system consists of a set of rules, procedures and information flows, including:

- ▶ the **Code of Ethics and Conduct**, which indicates the Values and Conduct Guidelines to be followed at a company level, and which represents a fundamental component of the 231 Organisational Model and the Group's Internal Control and Risk Management System
- ▶ the **"231 Organisational Model"**, which

prevents the commission of potentially crimes that could be committed in our activities business that may entail administrative liability for the company

- ▶ the **Anti-Corruption Policy** which provides a systematic framework for managing the prevention of corruption
- ▶ the **"Anti-Corruption Management System" (AMS)** that supports us in preventing, detecting and responding to incidents of corruption, in compliance with relevant laws and the commitments made voluntarily.

The AMS, which has obtained UNI ISO 37001 "Anti-bribery Management Systems", certification, applies to members of our corporate bodies, employees and external staff acting in various capacities. In addition to TIM S.p.A., the following are also certified: Olivetti, Telecom Italia Trust Technology, Telecontact Center, Telecom Italia Sparkle e TIM Brasil.

- ▶ the **"Whistleblowing Procedure"**, that governs the process of transmitting, receiving, analysing and managing reports of alleged wrongdoing by our employees

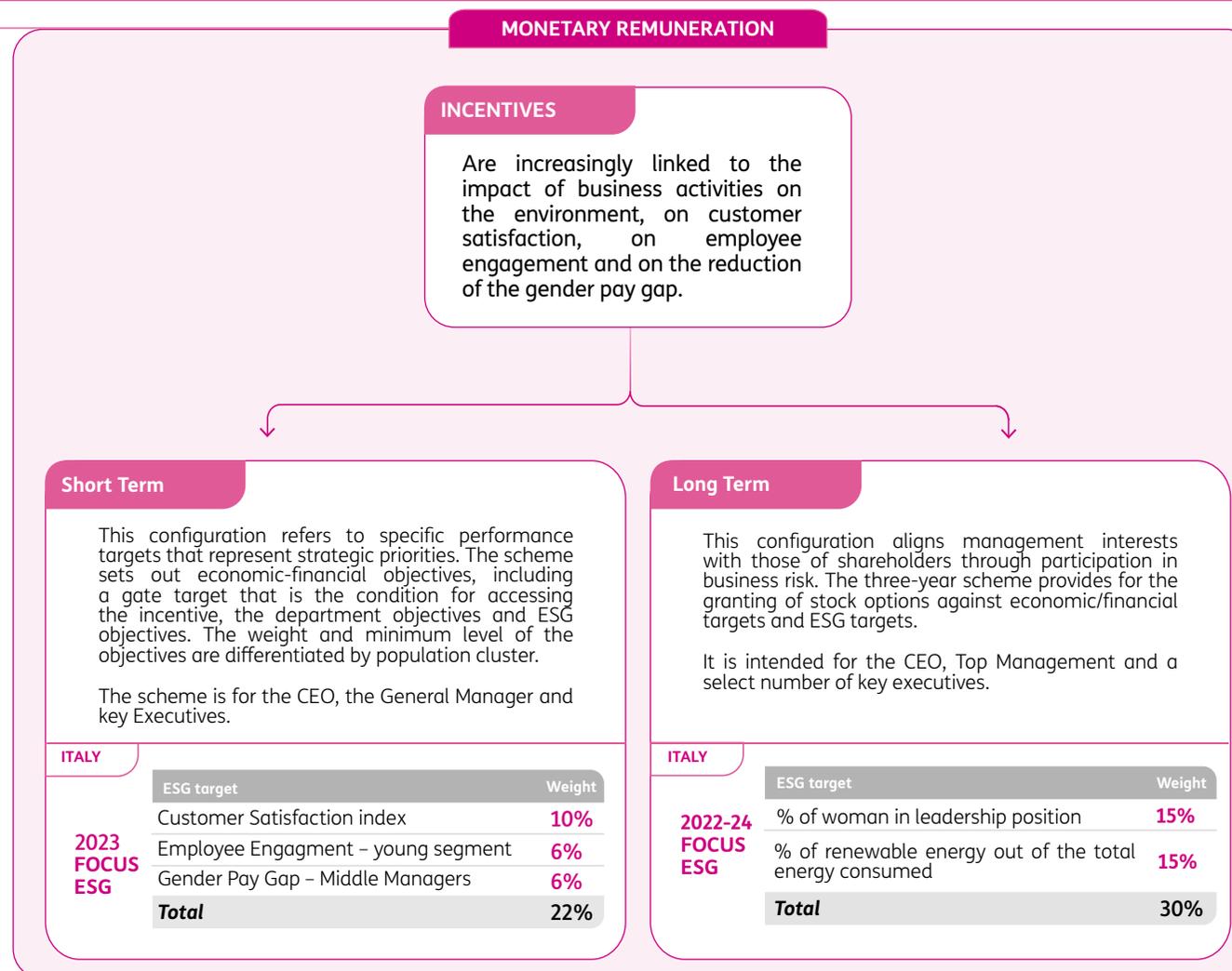
# ESG GOVERNANCE TOOLS

We implement processes, policies and certifications to manage our business according to sustainability criteria

## The ESG incentive system

The variable remuneration policy is another important lever to achieve the ESG targets in the time set<sup>1</sup>.

<sup>1</sup> For further information on remuneration, please refer to "Report on the Remuneration Policy and Compensation Paid" available on the website [www.gruppotim.it](http://www.gruppotim.it) and to "Management Remuneration Policy" on the website [www.tim.com.br](http://www.tim.com.br)



# ESG GOVERNANCE TOOLS

## Stakeholder Engagement

We engage with our stakeholders on the most relevant issues to our business, through consultation, dialogue, information and collaboration activities that we organise throughout the year, to better steer our operational and strategic activities.

Materiality analysis is a recurring activity and takes place prior to drawing up the non-financial reporting. In a specific survey, we consider the most relevant material topics in terms of impact. The list of stakeholders has been arranged following the global standard AA1000SES.

In 2023, the eight categories of stakeholders already present in 2022 were confirmed. We involved our stakeholders in the materiality analysis, carrying out **about 1,000 interviews, including online surveys and face-to-face meetings.**

### MAIN STAKEHOLDER ENGAGEMENT CHANNELS



#### TIM PEOPLE

*Includes trade unions*

- About **16 million views on the intranet portal.**
- **219 news** stories created, generating more than **2,873** comments



#### INDUSTRY BUSINESS COMMUNITY

*Includes peer, over the top, industry associations*

- **Intra-operator working tables** in the Trade Associations Working Groups (ASSTEL and Anitec-Assinform) and in the Confindustria Digitale Federation
- Active member of GSMA Foundation and European Telecommunications Network Operators' Association (ETNO)
- Participation at conferences/events in Italy



#### FINANCIAL COMMUNITY

*Includes shareholders and banks*

- **Quarterly** financial reports
- **Quarterly** presentations/webinars
- Participation in the compilation of questionnaires and surveys of **more than 20 ESG rating agencies**
- **Individual calls** with leading **industry analysts**



#### CIVIL SOCIETY

*Includes consumer associations*

- Active participation in the **Consumers' Forum**
- Regular meetings with **Consumer Associations** that endorse the memorandum of understanding
- Experimentation with Gaeta High School to create a **Digital High School**
- Founding partner of the **Higher Technological Institute** that trains Data Analysts and Digital Transformation Specialists



#### CUSTOMERS

*Includes peer, over the top, industry associations*

- Listening plan with **more than 3.3 million interviews in Italy**
- **71 million instant messaging conversations**
- **About 300 thousand caring conversations** on Facebook and Twitter
- **187,000 reports** in the MyTIM private area of the TIM.it website and from APP



#### MEDIA

*Includes opinion maker*

- **About 300 Press Releases between Italy and Brazil**



#### SUPPLIERS AND BUSINESS PARTNERS

- More than **1,000** vendors evaluated on ESG performance
- Approximately **40%** of ESG-risk suppliers monitored by Vendor Rating
- **150 Audit JAC** including **3** by TIM



#### BODIES AND INSTITUTIONS

*Includes public administrations, national and international institutions*

- Participation in working tables on industrial policies, labor and simplification with relevant ministries and government departments
- Participation in Meetings/Working Groups of the European Commission

# ESG GOVERNANCE TOOLS

## Materiality analysis

This is the process underlying Non-Financial Reporting and is an input for strategic planning and corporate risk management. The analysis<sup>1</sup>, conducted according to the Global Reporting Initiative's international standard, involved **external and internal stakeholders, top**

**management** and members of TIM S.p.A's **Sustainability Committee**, who assessed the relevance of material topics based on the impact, actual or potential, that TIM can generate on society and the surrounding environment (inside-out approach).

### STEPS OF TIM'S MATERIALITY ANALYSIS

- 1** **CONTEXT ANALYSIS AND IDENTIFICATION OF RELEVANT TOPICS**
  - We select material topics based on a dynamic semantics engine.
  - We carry out an initial risk analysis.
- 2** **DEFINITION OF CRITERIA FOR MEASURING THE IMPACT OF TOPICS**
  - We define the qualification criteria for material topics according to the relevance of the impact.
- 3** **IDENTIFICATION AND RELEVANCE OF STAKEHOLDERS**
  - We identify, classify and weigh relevant stakeholders according to the AA100SES standard.
- 4** **STAKEHOLDER ENGAGEMENT**
  - We select stakeholders and top managers and handout a survey to them.
- 5** **SUMMARY AND PRIORITISATION OF MATERIAL TOPICS**
  - We consolidate the material topics.
  - We validate the material topics and sort them by relevance and impact. We verify the consistency between the topics and risks with risk management.
- 6** **VALIDATION OF MATERIAL TOPICS BY BOARD BODIES**
  - We submit the material topics for the approval of the Sustainability and Control and Risk Committees.

<sup>1</sup> For further information on materiality analysis, please refer to GRI 3.1 "Process for Determining Material Themes" in the "GRI & Taxonomy" section.

# ESG GOVERNANCE TOOLS

In 2023, **10 material topics** were identified, which we list below ordered by impact relevance.

**Compared to 2022**, we optimized and reclassified the topics, reducing them in number compared to the 16 of the previous year.

**The material topics are monitored thanks to the ESG targets of the Business Plan, and the projects aimed at achieving them.**

## LIST OF MATERIAL TOPICS

MATERIAL TOPICS		IMPACT	
S	G	PRIVACY E CYBERSECURITY	NEGATIVE POTENTIAL
S		DIGITAL TRANSFORMATION AND INCLUSION <sup>1</sup>	POSITIVE ACTUAL
G		CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES	POSITIVE ACTUAL
E		CLIMATE CHANGE	NEGATIVE ACTUAL
E		USE OF RENEWABLE ENERGY SOURCES <sup>2</sup>	POSITIVE ACTUAL
S		EQUAL PAY AND OPPORTUNITIES AT TIM	POSITIVE POTENTIAL
S		WORKER HEALTH AND SAFETY	NEGATIVE ACTUAL
S		INFRASTRUCTURES AND EMERGING TECHNOLOGIES	POSITIVE ACTUAL
G		ETHICS AND CORPORATE GOVERNANCE	NEGATIVE POTENTIAL
E		SUSTAINABLE SUPPLY CHAIN	POSITIVE ACTUAL

ENVIRONMENT

SOCIAL

GOVERNANCE

<sup>1</sup>In 2022, the topic was called "Digital Inclusion"

<sup>2</sup>In 2022, the topic was called "Energy Transition"

# ESG GOVERNANCE TOOLS

## The system of listening to our customers

Quality and customer experience are monitored by an extensive listening system that detects the customer journey at the various touch points and allows us to define specific improvement plans to give value to the feedback of our customers. Italian market surveys include the monitoring of the “**Customer Satisfaction Index**” based on the

ACSI standard (American Customer Satisfaction Index), which was particularly important, measuring the quality perceived by TIM customers and customers of main competitors.

In 2023, CSI value for Consumer customer base of the Italy perimeter is essentially unchanged confirming a stable performance.

Also in the Small and Medium Business segments, CSI improvement targets were fully achieved.

With reference to the customer satisfaction indicators monitored by TIM Brasil, in 2023 there was an improvement in the average consumer customer satisfaction index, **up +4% compared to 2022**.



# ESG GOVERNANCE TOOLS

## Certifications demonstrating our commitment to value creation

In 2023, we had **10 main certifications** with a specific focus on ESG issues.

Thanks to the certifications obtained, we can demonstrate the effectiveness of our management and organizational system, we provide assurance to our stakeholders and we ensure compliance with applicable national and international standards required for the tenders we participate in.

	TIM S.P.A.	NOOVLE	OLIVETTI	TELSY	TELECOM ITALIA TRUST TECHNOLOGIES	SPARKLE	TIM BRASIL
<b>E</b>	<b>ISO 14001:</b> sets the requirements of the Company's <b>environmental management system</b>	■	■	■	■	■	■
	<b>ISO 14064:</b> Certifies the <b>quality of the Company's greenhouse gas emissions reporting</b> and monitoring process	■	■	■	■	■	■
	<b>ISO 50001:</b> certifies the development of an efficient <b>energy management system</b>	■	■	■	■	■	■
<b>S</b>	<b>ISO 45001:</b> standard for the occupational <b>health and safety</b> management system	■	■	■	■	■	■
	<b>ISO 30415:</b> certifies the presence and quality of <b>inclusive and sustainable corporate programs</b> in the workplace	■	■	■	■	■	■
	<b>UNI/PdR 125:</b> certifies the presence of a <b>gender equality</b> management system	■	■	■	■	■	■
<b>G</b>	<b>ISO 22301:</b> certifies the presence of a system for <b>business continuity</b> management under adverse conditions	■	■	■	■	■	■
	<b>ISO 9001:</b> establishes the requirements for a quality management system certifying the level of quality of the Company's products and services	■	■	■	■	■	■
	<b>ISO/IEC 27001:</b> the reference standard for <b>information security</b> management	■	■	■	■	■	■
	<b>ISO 37001:</b> certifies the presence of <b>management system for the preventing bribery</b>	■	■	■	■	■	■

Certifications may refer to specific areas of corporate activity

# ESG GOVERNANCE TOOLS

## The Policies to address operations

We introduce and update internal and external policies and organizational procedures to steer proper business management.

These include the **21 most relevant ESG Policies**

MAIN ESG POLICIES		
E	Environment	GROUP
	Climate Change	BRAZIL
S	Social Responsibility	BRAZIL
	Diversity & Inclusion	
	Gender Harassment	GROUP
	Human Rights	
	Human Resources and Equal Opportunities	
	Health and Safety	
	Information security e cybersecurity	
Privacy		
G	Code of Ethics and Conduct	GROUP
	Whistleblowing Procedure	
	Tax Strategy	
	Purchasing products and services	
	Crisis Management	
	Anti-corruption	
	Stakeholder Engagement	
	Enterprise Risk Management	
	Business Continuity	
	Corporate governance	
	Remuneration Report	

# BUSINESS INTEGRITY

We support continuous improvement by promoting a culture of fairness and transparency

## Risk management system

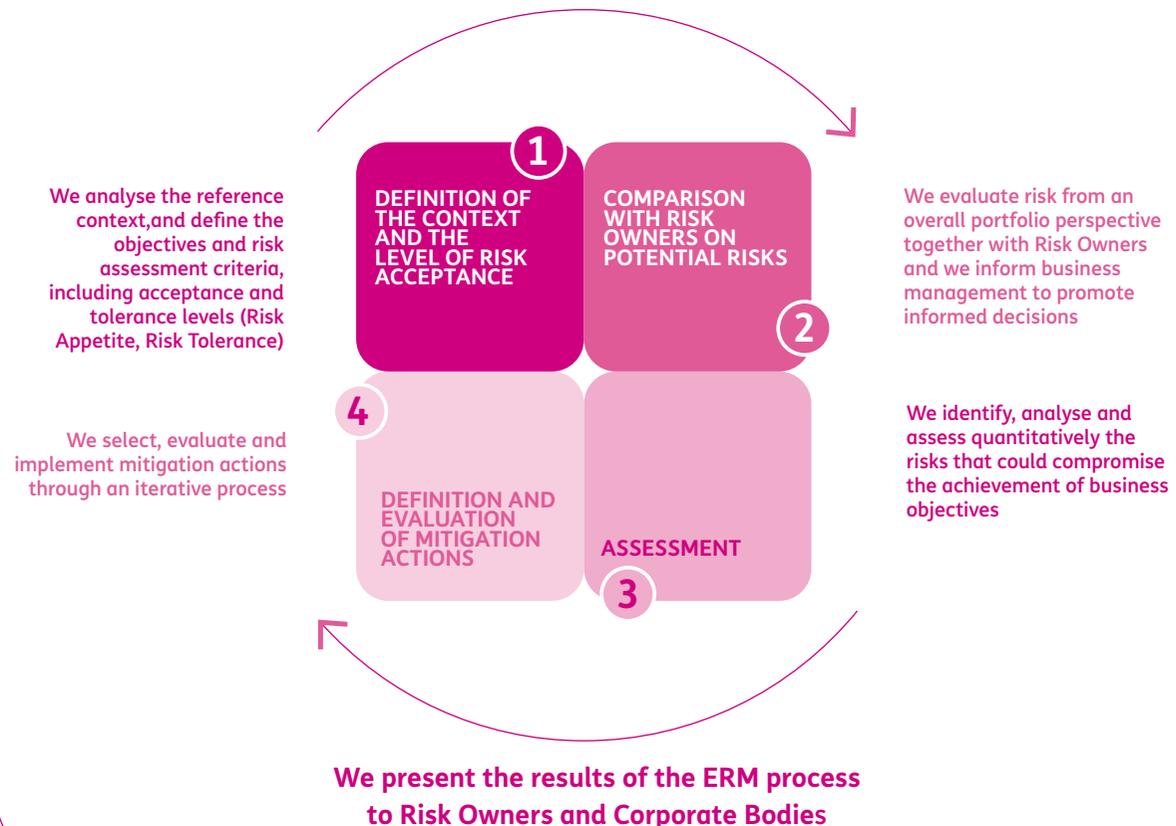
TIM Group adopts an **Enterprise Risk Management (ERM)** model that follows applicable international standards and regulations and is integrated into strategic and operational planning processes.

The ERM model allows to identify potential events that may affect business activity, and to manage risks within acceptable limits of tolerance, offering Top Management the tools to make informed business choices.

We carry out a periodic review of risk scenarios not only when the Business Plan is defined but also when significant changes in the internal and external context or new risk scenarios occur.

### TIM'S ENTERPRISE RISK MANAGEMENT MODEL

We review risk scenarios and mitigation plans with a view to continuous improvement

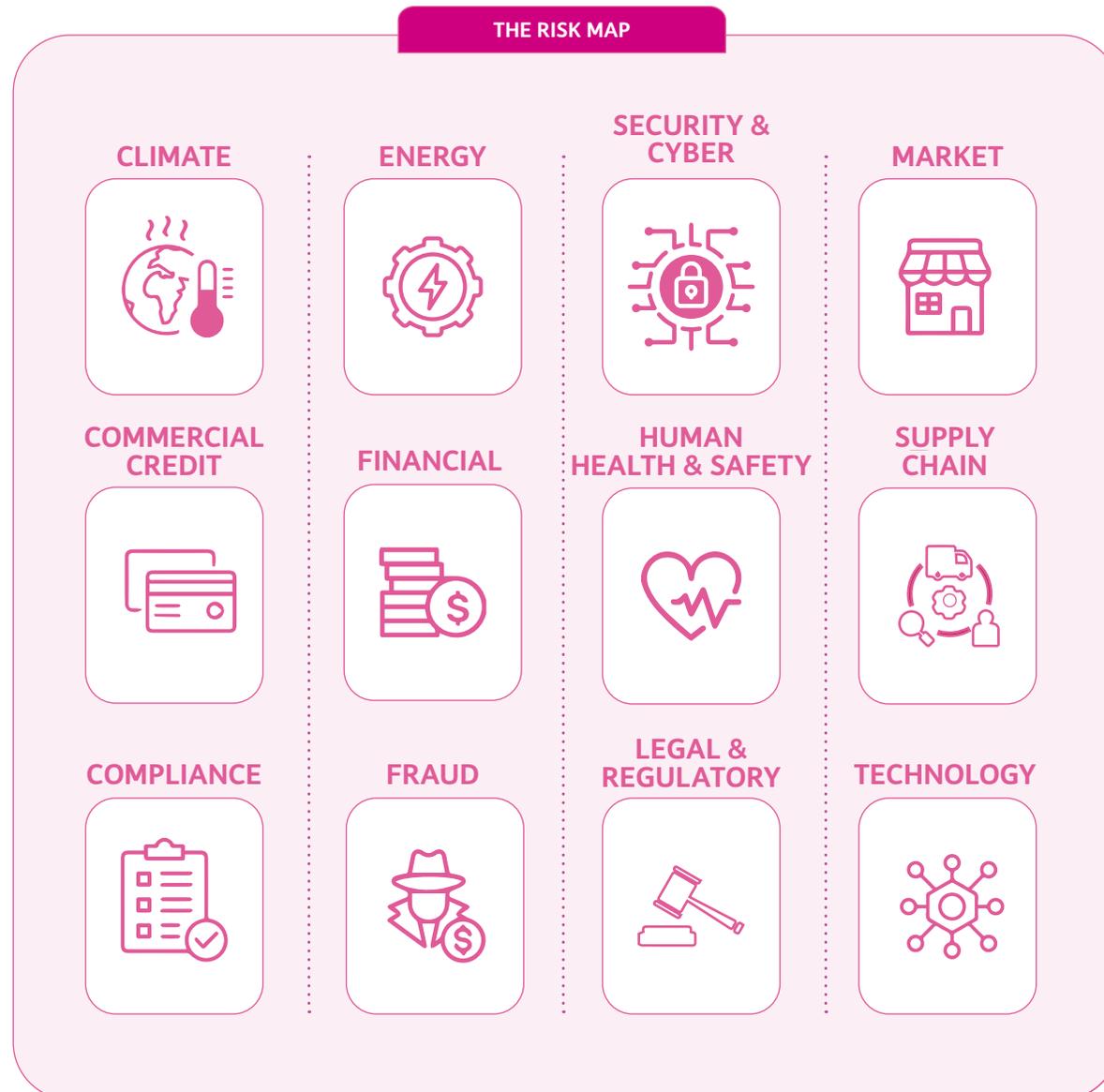


# BUSINESS INTEGRITY

ERM has identified and mapped the risks of our Group in **12** evolving **clusters**<sup>1</sup>.

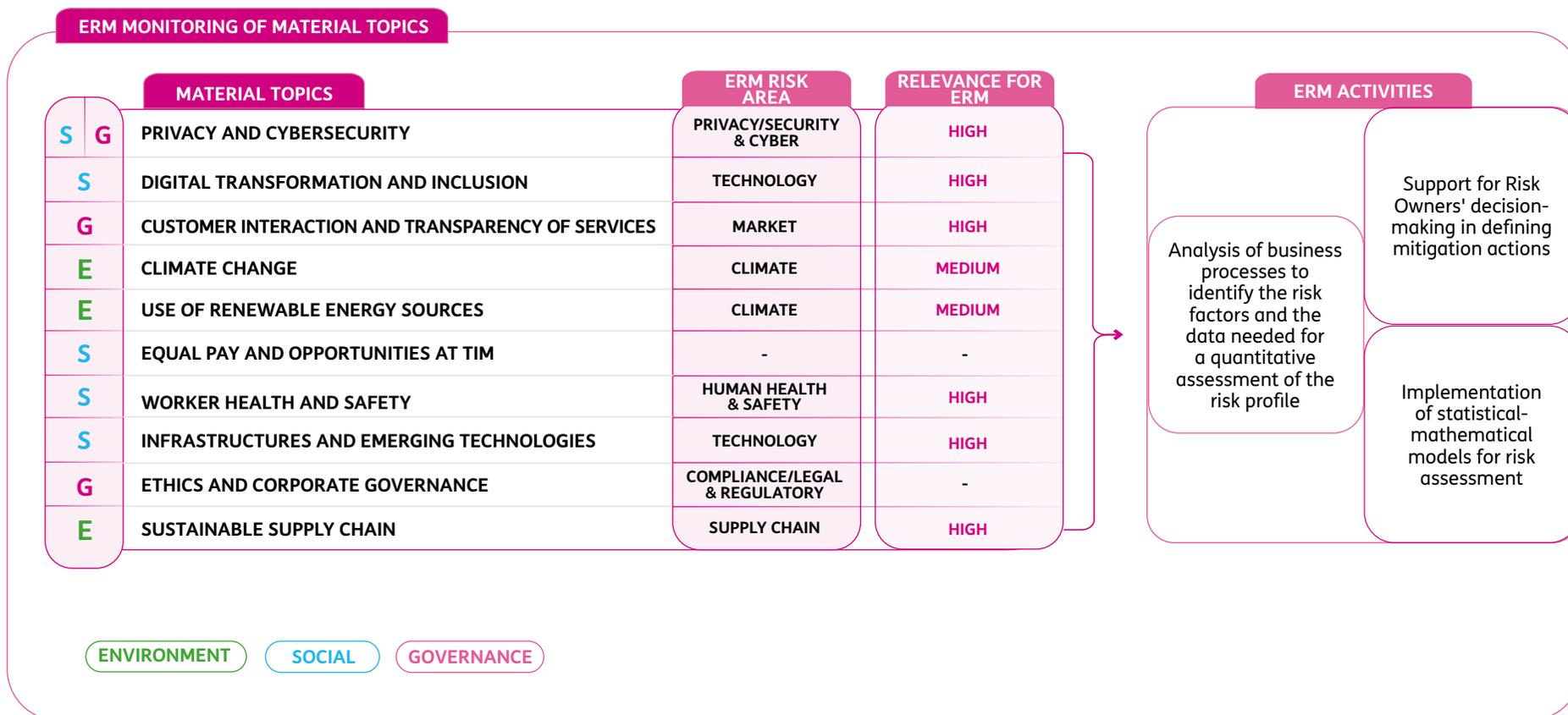
Risks falling under ESG are an integral part of the identified clusters.

<sup>1</sup>For ERM, risk is defined as a possible event that could jeopardise the achievement of the Business Plan targets or the proper functioning of business processes and which, if identified and assessed well in advance, could generate value



# BUSINESS INTEGRITY

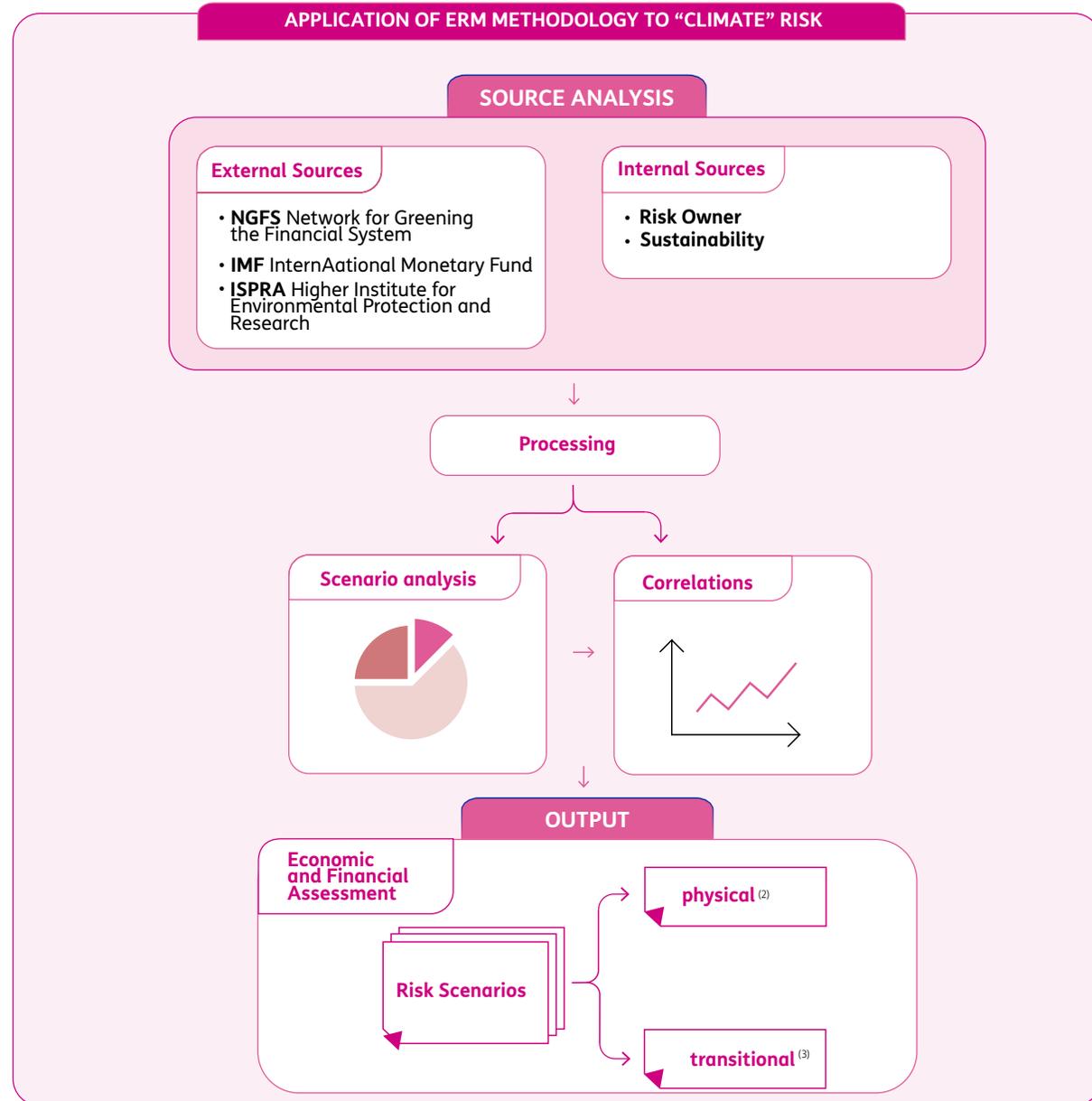
In 2023 as well, the **risks associated with the most relevant Material Topics were mapped and monitored by the ERM model**, through specific mitigation activities defined by the Risk Owners with the support of the Risk Management Department.



# BUSINESS INTEGRITY

Within the framework of **business risks**, “Climate” risk is managed in accordance with the model proposed by the **Task Force on Climate-related Financial Disclosures<sup>1</sup>**, which recommends the disclosure by the company of the metrics and targets used to assess and monitor climate-related risks and opportunities, including Scope 1, 2 and, where possible, Scope 3 emissions.

To measure the actual and potential impact of this risk, we use a model for evaluating short-, medium- and long-term risk scenarios that provides an **economic and financial output of the risk**.



<sup>1</sup> The Task Force on Climate-related Financial Disclosures (TCFD) has been created by the Financial Stability Board (FSB), the international body that monitors and makes recommendations on the global financial system to improve and increase the communication of climate-related financial information.

<sup>2</sup> They derive from the impacts of climate change

<sup>3</sup> They derive from actions associated with a transition to a low-carbon economy, e.g. the introduction of new low-carbon climate or technological policies.

# BUSINESS INTEGRITY

## The protection of privacy and the protection of personal data

During 2023, the Group's Organizational Model came into effect, which oversees the protection of personal data according to the **privacy-by-design** principle.

The model requires the data controller to implement technical and organizational measures such as the mapping of personal data processing activities, the assessment of privacy risk, as well as the introduction of IT tools for managing Information Notices and for managing Registers, which allow for the integration of managed information.

In the IT security area, we constantly upgrade the protection measures of the public telecommunications network and of our network and data center infrastructures, and have a solid process in place for managing cybersecurity incidents, reinforced by policies and operating procedures on Crisis Management.

## Minors protection

The curiosity and lack of experience of children who use chat, mail, instant messaging and more generally internet services can make browsing the web unsafe.

Our goal is to protect minors from these virtual places, first of all through **offers dedicated to young people (TIM Junior)** that protect them when browsing from smartphones or PCs, with features such as parental control, antivirus and anti malware, protection and privacy.

## Human rights

Our commitment to Human Rights goes beyond "basic" rights and considers the specific aspects of our business activity, recognising the right to access information, freedom of expression, the protection of privacy and online security, the protection of minors from the risks associated with the use of new technologies.

**Since 2002, we have endorsed the United Nations Global Compact**, proactively

participating in national and international networks, both sector-focussed and more broad-ranging, in the field of Human Rights.

We participate in the Joint Audit Cooperation, the joint initiative of telecommunications operators, which aims to promote the application of principles and Corporate Social Responsibility in the supply chain, also conducting audits to verify the level of respect for human rights in the production plants of relevant suppliers, located in areas with a significant level of socio-environmental risk.

Regarding our people, since 2021 we have had a zero-tolerance policy regarding gender, sexual harassment and bullying, and promote awareness-raising and preventive training activities for employees, also introducing psychological and legal support tools for any victims.

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# METHODOLOGICAL NOTE

## Scope and criteria

The Consolidated Non-Financial Statement (hereinafter the "Statement") meets the obligations established by Legislative Decree 254/2016 regarding the disclosure of non-financial information. The Statement presents the data and information referring to the Company TIM S.p.A. and the companies controlled by it and consolidated on a line-by-line basis at 31 December 2023 (hereinafter "the TIM Group" or "the Group"), as presented in the Annual Financial Report.

Environmental performance data are presented with limitations of scope, established on the basis of criteria of significance<sup>(1)</sup>. More generally, the reference scope is specified in the note of each chapter and/or section, if necessary. These limitations are not relevant for the purposes of understanding the company's activities, its performance, its results and the impact produced by the Group. The Statement is a separate report from the Group Report on

Operations and represents for TIM its ongoing commitment to communicate the performance and results achieved in the field of sustainability, already taken up in previous years, to stakeholders.

The 2023 Statement, drawn up annually for the calendar year, has the same deadlines as the Group's Annual Financial Report and is published on 26 March 2024. For further information about the published document, please contact: Sustainability.Reporting@telecomitalia.it

The Statement was prepared in accordance with the Global Reporting Initiative (GRI) Sustainability Reporting Standard. References to the GRI disclosures are shown within the text highlighted with the symbol [GRI disclosure no.].

*(1) The reporting scope of the Non-Financial Statements coincides with the Annual Financial Report, with the exception of environmental data for which, starting from the scope of consolidation of the Domestic BU, as indicated in the 2023 Financial Report, threshold values have been applied to the following items of the 2023 Interim Report, Domestic BU:*

- turnover: 0.5% of turnover;
- number of employees: 0.5% of the number;
- expenditure on energy and fluids: 0.1% of expenditure.

*The following TIM Group companies were included in the 2023 environmental scope:*

*TIM S.p.A, Sparkle Group (companies that meet the criteria), Fibercop S.p.A, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telenergia S.r.l., Telsy S.p.A., TIM Retail S.r.l. as well as the Brazil BU. We inform you that with reference to the energy data of Sparkle Greece, part of the electricity consumption purchased by the company is covered by Certificates of Origin based on what was announced by the Greek Government in application of Law 4951/2022 (ΑΖΗΜΙΩΣ ΚΑΤΑΝΕΜΗΘΕΙΣ ΕΓΓΥΗΣΕΙΣ Π ΡΟΕΛΕΥΣΗΣ ΓΙΑ ΤΟ ΕΤΟΣ 2023 - Διαχειριστής ΑΠΕ & Εγγυήσεων Προέλευσης Α.Ε. - ΔΑΠΕΕΠ Α.Ε. (dapeep .gr))*

## METHODOLOGICAL NOTE

In terms of internal control of the Statement's contents, the Company has a system in place which provides for the following:

- an internal control system, implemented on the digital platform used for data collection, aimed at ensuring the correct collection and reporting of non-financial information;
- the signing of a letter by top management certifying the data in the Statement under its responsibility.

Finally, at the end of the Non-Financial Statement, information is provided on the European Taxonomy.

In terms of external control, the Non-Financial Statement is subject

to a limited assurance engagement by EY S.p.A., the Group's independent auditors, whose Report is available at the end of this Report. The quantitative indicators not referring to any general or topic-specific disclosure of the GRI Standards, reported in correspondence with the pages indicated in the Contents, are not subject to the limited assurance engagement of EY S.p.A.

This document was approved by the Board of Directors of TIM S.p.A. on 6 March 2024.

## GRI 2 - GENERAL DISCLOSURE

### [2-1 a]

Telecom Italia S.p.A., also known as TIM S.p.A.

### [2-1 b]

It is a joint stock company under Italian law, issuing shares listed on the market organized and managed by Borsa Italiana S.p.A.

### [2-1 c]

TIM has its registered office in Milan and secondary headquarters and general management in Rome.

### [2-1 d]

The TIM Group operates mainly in Europe, Brazil and, to a limited extent, in Asia as stated in the Annual Financial Report available on the Group website.

### [2-2 a]

The Sustainability Report presents the data and information that refer to the TIM Group.

### [2-2 b]

In the 2023 Sustainability Report, environmental performance data is presented excluding the following TIM Group companies: Olivetti Deutschland GmbH, Noovle International SAGL, Noovle Malta Ltd, Noovle Sicilia S.c.a.r.l., Panama Digital Gateway S.A., Staer Sistemi Srl, Mindcity, Trust Technologies, Telecom Italia San Marino S.p.A., Telefonía Mobile Sammarinese S.p.A.

### [2-2 ci, cii, ciii]

The Sustainability Report presents the data and information referring to the company TIM S.p.A. and its subsidiaries consolidated

on a line-by-line basis as of 31 December 2023, as presented in the Annual Financial Report.

The Sustainability Report does not report changes regarding minority interests.

The environmental performance data are presented excluding companies reported in [GRI 2-2b] that do not meet the relevance criteria. The list of material topics of economic, environmental and social impact is obtained from the complete perimeter of the TIM Group.

### [2-3 a]

The TIM Group Sustainability Report, drawn up annually, corresponding to the calendar year, reflects the same period as the Group's Financial Statements.

### [2-3 b]

The Group's Financial Statements, like the Sustainability Report, cover the period from 1 January 2023 to 31 December 2023.

### [2-3 c]

The TIM Group Sustainability Report is published following its approval by the Board of Directors on 6.3.2024. The exact date of publication is reported in the Methodological Note of this document.

### [2-3 d]

Contacts: Corporate Communication & Sustainability of TIM S.p.A. Via G. Negri 1 10123 Milan, Italy Tel.: +39 06 3688 5092; email address: Sustainability.Reporting@telecomitalia.it, website: www.telecomitalia.com. Brazil: respocialcorp@timbrasil.com.br.

## GRI 2 - GENERAL DISCLOSURE

### [2-4 ai, aii]

There were no significant changes to the information reported in the years 2021 and 2022.

### [2-5a, b]

The auditor Ernst & Young ("EY") was selected in 2018, based on a tender procedure called, following the applicable regulatory framework and taking into account that TIM S.p.A., as a Public Interest Entity ("PIE"), has the task of determining the selection procedure and preparing the tender documents containing, among other things, the selection criteria. The Control and Risks Committee, or the Board of Statutory Auditors of TIM S.p.A. is responsible for the auditor selection procedure and validates the report prepared by TIM S.p.A. on the conclusions of the tender procedure. The appointment of the auditor was approved by the Shareholders' Meeting of TIM S.p.A. on 29 March 2019.

Under current legislation, the statutory auditor is required to verify the preparation of the Non-Financial statement ("NFS") and give an opinion on the conformity of the non-financial information to the methodologies and principles adopted for drafting it. The work is carried out by the Auditor based on the provisions of the "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" issued by the International Auditing and Assurance Standards Board for limited assurance engagements. Therefore, the independent auditors, based on the audit activities carried out and indicated in the Report, issue an audit report in which they declare whether (or not) elements have come to their attention which have led them to believe that the TIM Group's NFS was not drawn up, in all material aspects, in compliance with the requirements of Articles 3 and 4 of Legislative Decree 254/2016

and the GRI Standards. This report is included in the Sustainability Report or NFS.

It is confirmed that EY guarantees it is independent in accordance with the principles of ethics and independence of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional conduct.

Finally, it should be noted that, on the basis of the Guidelines for the assignment of engagements to the Sole Auditor of the Group, TIM S.p.A., to protect the independence of the Auditors, limits the assignment of further tasks to the same Sole Auditor to services and activities that are strictly related to auditing financial statements/reporting packages.

### [2-6 a]

TIM is the leading group in Italy and Brazil in the ICT sector, at the forefront of digital technologies. It develops fixed fiber network infrastructures which it makes available to the entire market, both through a widespread presence across Italy, and through Sparkle at an international level. More information is available at: <https://www.gruppotim.it/it/gruppo/chi-siamo.html>

### [2-6 bi]

The TIM Group offers individuals and families fixed and mobile telephony services and products for communication and entertainment and accompanies small and medium-sized businesses towards digitalization with a portfolio tailored to their needs. TIM Enterprise is the reference for end-to-end IT solutions for companies and the Public Administration and implements

## GRI 2 - GENERAL DISCLOSURE

the country's digital transformation by making use of the largest network of Data Centers in Italy, the expertise of Group companies such as Noovle, Olivetti and Telsy, and of partnerships with groups of primary importance.

In Brazil, TIM Brasil is one of the main players in the South American communications market.

The Group companies have adopted numerous initiatives to protect minors from a content that can harm their psychological and physical development (for example violent, pornographic, racist content, content offending religious sentiments, etc.). For the Domestic BU, no turnover from the sale of services reserved for adults, and no revenues relating to gambling were recorded for 2023.

Furthermore, through Fondazione TIM in Italy and Instituto TIM in Brazil, the Group supports projects of considerable social interest.

### [2-6 bii]

The TIM Group's purchases mainly take place in the two geographical areas where the Group's primary activities are based, Italy and Brazil, and are mostly directed towards the categories of products and services indicated below:

- Telecommunications networks;
- Telecommunications products;
- Information Technology;
- Professional and Technical Services;
- Electrical power systems.

During 2023, the TIM Group made payments of a commercial nature (with the exclusion of payments made to Other Licensed Operators) for approximately 11 billion euros.

There are almost 2,500 tier 1 suppliers in the supply chain (of which 2,200 local) and 1,700 tier 2 suppliers, for a total of approximately 4,200 suppliers<sup>(1)</sup>.

<sup>(1)</sup> The data relating to the supply chain in the Domestic BU area refer to the following companies: Telecontact Center S.p.A. - Olivetti S.p.A. - TI Sparkle S.p.A. - TI Trust Technologies S.r.l. - TI Ventures S.r.l. - Fibercop S.p.A. - TIM MY BROKER S.r.l. - TIM Servizi Digitali S.p.A. - Telecom Italia S.p.A. - Noovle S.p.A. - TI Sparkle Germany GmbH - TI Sparkle Netherlands BV - TI Sparkle France S.a.s. - TI Sparkle Austria GmbH - TI Sparkle Turkey - TI Sparkle Israel Ltd.

## GRI 2 - GENERAL DISCLOSURE

### [2-6 biii]

On a domestic level, TIM represents the largest network infrastructure in the country with an FTTx network coverage of more than 95% of active lines and a Fiber to the Home (FTTH) coverage equal to 38% of Real Estate Technical Units. It manages the TIM mobile network in Italy and also develops wholesale network infrastructures which it makes available to other operators.

At an international level, it offers global services to fixed/mobile operators, media and contents, OTT, ISPs and businesses, through its subsidiary Sparkle. At the end of 2023, in the Consumer and Business markets, TIM was positioned as a "premium brand" for quality and offering, serving over 8 million retail users on fixed telephone access and reaching over 30 million mobile lines.

Thanks to the Noovle, Olivetti and Telsy factories, TIM Enterprise creates end-to-end solutions for top customers and public administration companies, providing Connectivity, Cloud, IoT and Cybersecurity services.

In Brazil, TIM is one of the main players in the South American telecommunications market and a leader in mobile coverage. In December 2023, the company reached 209 cities in the country with 5G coverage (presence in 27 capitals), reaching a mobile customer base of over 61.2 million.

### [2-6 c]

Polo Strategico Nazionale ([www.polostrategiconazionale.it](http://www.polostrategiconazionale.it)) is the company owned by TIM, Leonardo, CDP and Sogei whose mission is the creation and management of a technologically innovative and independent cloud infrastructure, to guarantee security and economic and environmental sustainability in the management of data and applications of the Italian Public Administration.

### [2-6 d]

With the delayering plan, the TIM Group has undertaken a strategy aimed at overcoming the vertically integrated operator model through the sale of fixed network infrastructure assets to Kohlberg Kravis Roberts & Co. LP ("KKR"). Last November, following the approval of the transaction by the Board of Directors, a business unit was established, known as 'NetCo', which includes the Chief Network, Organization & Wholesale Office division, the infrastructure assets of the fixed network and wholesale activities. The closing of the transaction is expected by summer 2024 and its execution will lead to a significant reduction in the debt level, allowing the Group to focus more on offering services on the following markets:

- The large business and public administration segment through TIM Enterprise;
- The families, private individuals and small and medium-sized businesses segment;
- The Brazilian TLC market through TIM Brasil.

# GRI 2 - GENERAL DISCLOSURE

## [GRI 2-7 a]

Total number of employees by gender and geographical area of the Group	2023			2022			2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Italy	24,577	13,062	37,639	26,430	14,307	40,737	27,460	14,871	42,331
Brazil	4,589	4,678	9,267	4,644	4,751	9,395	4,629	4,696	9,325
Other	180	63	243	185	60	245	195	62	257
Total payroll personnel	29,346	17,803	47,149	31,259	19,118	50,377	32,284	19,629	51,913
Personnel with temporary employment contract	24	7	31	9	6	15	9	7	16
Total personnel	29,370	17,810	47,180	31,268	19,124	50,392	32,293	19,636	51,929

## [GRI 2-7 bi, bii, biv, bv]

Total number of employees by gender and geographical area of the Group	2023		2022		2021	
	Men	Women	Men	Women	Men	Women
Total number of employees	29,346	17,803	31,259	19,118	32,284	19,629
Total number of employees - of which fixed term	279	1,184	111	93	111	87
Total number of employees - of which permanent	29,067	16,619	31,148	19,025	32,173	19,542
Total number of employees - of which full time	28,500	13,866	30,076	13,442	31,130	13,954
Total number of employees - of which part time	846	3,937	1,183	5,676	1,154	5,675

Total number of employees by gender and geographical area of the Group	2023			2022		
	Italy	Brazil	Other	Italy	Brazil	Other
Total number of employees	37,639	9,267	243	40,737	9,395	245
of which fixed term	1,459	4	0	203	1	0
of which permanent	36,180	9,263	243	40,534	9,394	245
of which full time	34,463	7,662	241	35,633	7,643	242
of which part time	3,176	1,605	2	5,104	1,752	3

## GRI 2 - GENERAL DISCLOSURE

### [2-7 b]

The new breakdown by geographical area is available starting from 2022; employees in Italy in 2022 totaled 40,737 and in 2021 42,331; outside Italy, this figure stood at 9,640 in 2022 and 9,582 in 2021.

There are no employees with intermittent employment contracts in the Group.

### [2-7 c]

For TIM S.p.A., Telsy, Telecontact, TI Sparkle, TI Trust Technologies, Olivetti, Noovle and Fibercop, the survey was conducted by extrapolating data from the Group's IT systems. Data from other companies in the Group are provided directly by the companies themselves. The data are indicated as whole numbers of staff. The average annual figure for whole numbers of staff was calculated by applying the arithmetic mean, for each type of personnel, to the number of whole numbers of staff present at the end of each month of the year.

### [2-7 d]

The data shown refer to whole numbers of staff present at 31 December 2023 of the TIM Group companies, divided by each cluster and type of identification (gender, contract type, time type, territorial distribution).

### [2-7 e]

Compared to the workforce present at 31 December 2022 (50,392), an overall decrease of 3,212 was recorded, mainly linked to voluntary early retirement in Italy.

### [2-8 ai, aii]

In Italy, non-employee workers mainly belong to the following types of companies:

- network companies
- unique companies

TIM does not have a direct contractual relationship with non-employee workers for the types of companies indicated above, as the employment relationship is stipulated between the workers and TIM's suppliers. At the end of 2023, the total number of these workers was 8,183.

Specifically, the term network companies means companies that carry out construction, maintenance and development activities of the copper and fiber optic network infrastructure up to the customer's home, including excavation and restoration work, the laying of copper and fiber optic cables, installation at the customer's home (router, etc...); the term unique companies means companies that carry out activities related to real estate and plant infrastructures, in particular civil infrastructure/buildings (masonry, gates, water network, etc.), technological infrastructure (electrical, heating, air conditioning) and infrastructure for power supply and air conditioning systems (energy stations, generators, battery connections, etc.).

In Brazil, TIM has been evaluating the conditions and means to seek to centralize information on workers who are not employees, currently distributed across numerous contracts and allocated mainly in customer service, sales and network services.

### [2-8 bi, bii]

The methodology used to compile the data is based on the FTEs at the end of the period, obtained from an algorithm that considers the turnover/contracts ratio and a predefined FTE value parameter.

## GRI 2 - GENERAL DISCLOSURE

### [2-8 c]

Fluctuations untracked.

### [2-9 a]

The Group's governance system is structured according to a traditional model, with a management board (Board of Directors) which, as a rule, is organized through internal committees, that are permanent or set up for specific operations, and a supervisory board (Board of Statutory Auditors).

### [2-9 b]

The Board of Directors resolved to establish the following internal committees:

- Nomination and Remuneration Committee
- Control and Risks Committee
- Related-Parties Committee
- Sustainability Committee

Each committee has its own regulation, approved by the Board of Directors, which defines the rules for its composition and appointment, the methods of functioning, tasks, powers and resources available. The regulations of the board committees are available on the Group website.

### [2-9 ci, cii, ciii]

As of 31 December 2023, the Board of Directors was composed of 1 executive member (Chief Executive Officer) and 14 non-executive members (including the Chairman of the Board of Directors).

As of 31 December 2023, the Board of Directors was composed of 15 members, of whom 10 independent.

On 31 March 2021, the Shareholders' Meeting renewed the term of office of the management board for the three-year period 2021-

2023. Detailed information is available on the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

### [2-9 ci, civ]

According to TIM's Self-Governance Principles, it is not considered compatible for a director of TIM to hold administration or control positions in more than five companies, other than those subject to management and coordination by TIM or controlled by it or associated with it, in the case of (i) listed companies included in the FTSE/MIB index, or (ii) companies operating predominantly in the public financial sector or (iii) companies carrying out banking or insurance activities; furthermore, more than three executive positions held in the companies referred to under (i), (ii) and (iii) by the same director is not considered compatible.

Different thresholds are not envisaged to take into account the participation of Directors on board committees. If a Director holds positions in several companies belonging to the same group, only one position held within that group is taken into account for the purposes of calculating the number of positions.

More detailed information is available in the Report on corporate governance and ownership structures, published on the Company's website.

### [2-9 cv]

In the appointment of the members of the Board of Directors which took place on 31 March 2021, Article 9.1 of the company articles of association was applied, which requires at least two fifths of Board Directors to be of the less represented gender.

As of 31 December 2023, female representation on the Board of Directors was 6 out of 15 directors. For any updates, please refer to the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

## GRI 2 - GENERAL DISCLOSURE

### [2-9 civ]

TIM is in favor of diversity in the composition of the Board of Directors, also based on the priority objective of an adequate competence and professionalism of its members.

No specific diversity policies have been adopted in relation to the composition of the Board of Directors, as the matter is considered to be in the remit of the members, in exercising their rights as candidates attributed by law and by the articles of association, as regards the lists presented by them, or in the remit of the outgoing Board, in the case of exercising the right to present one of its lists, with disclosure of the selection process and the adopted criteria.

### [2-9 cvii, cviii]

The curricula vitae and detailed information on the members of the Board of Directors in office are available on the Group's website ([www.gruppotim.it](http://www.gruppotim.it)).

The only stakeholders represented on the Board of Directors are the shareholders.

### [2-10 a]

Pursuant to the Articles of Association and TIM's Self-Governance Principles, the Board of Directors is appointed by the Shareholders' Meeting. The appointment takes place in compliance with applicable laws and regulations on the basis of lists presented by the shareholders or by the outgoing Board of Directors.

The Board of Directors establishes internal Committees, made up of non-executive Directors, the majority of whom are independent, with advisory functions, determining their duties and faculties.

### [2-10 bi]

Pursuant to the Articles of Association, only shareholders who, alone

or together with other shareholders, hold shares representing at least 0.5% of the share capital with the right to vote in the ordinary meeting, or the lesser amount required by the regulatory framework issued by the National Commission for Companies and the Stock Exchange, may present lists.

### [2-10 bii]

For the appointment of the members of the Board which took place on 31 March 2021, Article 9.1 of the company articles of association was applied, which requires at least two fifths of Board Directors to be of the less represented gender.

As of 31 December 2023, female representation on the Board of Directors was 6 out of 15 directors. For any updates, please refer to the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

### [2-10 biii, biv]

Pursuant to the Articles of Association, at least half of the directors drawn from each list must meet the independence requirements set out in Article 148 of Legislative Decree 58/1998 and/or in the Corporate Governance Code of Borsa Italiana.

The curricula vitae and the skills matrix of the members of the Board of Directors are available on the Group's website ([www.gruppotim.it](http://www.gruppotim.it)).

### [2-11 a]

The Chairman of the Board of Directors does not hold managerial positions within the organization.

### [2-11 b]

Not applicable.

## GRI 2 - GENERAL DISCLOSURE

### [2-12 a]

The Board of Directors has a steering and strategic supervision role, pursuing the priority objective of creating value for shareholders over a medium-long term horizon, also taking into account the legitimate interests of other stakeholders, with a view to the sustainable success of the business.

The Board of Directors has set up an internal Sustainability Committee with advisory, monitoring, investigative, support and steering activities for the board and management, on environmental, social and governance issues (ESG), in terms of positioning, objectives, processes, and specific initiatives of TIM and the Group. Furthermore, as stated in the regulation and in relation to board processes, the Sustainability Committee directly supports and steers the board and is also promptly involved with reference to the ESG profiles of the activities overseen by the other board committees, in the form of document sharing or joint assessments.

In particular, by way of example, the Committee interacts:

- a. with the Nomination and Remuneration Committee in relation to the possible inclusion of ESG matters in the Company's remuneration policy (also in the form of incentive parameters and objectives), as well as in monitoring the adoption and implementation of appropriate measures to promote equal gender treatment and opportunities within the company organization;
- b. with the Control and Risks Committee in preparing non-financial disclosure (the Sustainability Report/NFS) and in analyzing corporate risks of an ESG nature.

### [2-12 b]

The Board of Directors, also assisted by the Sustainability Committee, provides for the assessment of ESG monitoring, the definition of the materiality matrix, the monitoring of ongoing corporate initiatives

for sustainability and the definition of ESG objectives (starting from environmental objectives, with a specific focus on energy), depending on overall business planning.

### [2-12 bi]

The Sustainability Committee oversaw the process for defining the material impact topics for 2023.

More generally, TIM adopted the Engagement Policy in December 2020, which formalizes dialogue with all stakeholders, in line with the recommendations of the Corporate Governance Code of the Italian Stock Exchange.

### [2-12 bii, c]

The results of the processes are evaluated by the Board of Directors for the purposes of planning and finalizing the ESG objectives, as well as for preparing the annual Non-Financial Statement (Sustainability Report).

The set of principles and rules that guide the execution of activities aimed at pursuing corporate objectives, the management of the risks associated with them and the control and monitoring activities are defined in regulatory instruments (Policies, Procedures and Operating Instructions) that the Group adopts and disseminates throughout the organization, considering them fundamental knowledge management tools. Furthermore, roles and responsibilities relating to the planning, execution and control of company activities are assigned to TIM staff, guaranteeing the necessary information flows, in compliance with defined hierarchical lines, the diversity of roles and the company mission.

## GRI 2 - GENERAL DISCLOSURE

### [2-13 ai]

Responsibility for the overall governance of the Company and the Group is attributed to the CEO, in compliance with duties assigned to the Board of Directors by law, by TIM's Self-Governance Principles or by specific board decisions.

Sustainability matters are entrusted to the Corporate Communication & Sustainability function, which reports directly to the CEO. The monitoring of sustainability issues is also overseen by the Departments that manage the organization's impacts on the economy, the environment and people.

### [2-13 aii]

The Corporate Communication & Sustainability Department has a 'Sustainability' organizational unit which represents a single hub dedicated to the guidance, management and monitoring of the Group's sustainability policies, allowing sustainability areas to be addressed in a systematic way – Sustainability plan, projects and reporting – and making the relationship between planning and ESG reporting constant and seamless.

### [2-13 b]

During 2023, the Sustainability Committee met the Corporate Communication & Sustainability manager and team at all meetings, where the Chair provided specific information to the Board of Directors. The latter met with the Sustainability team on the occasion of the approval of the 2022 Non-Financial Statement.

### [2-14 a]

The Board of Directors annually approves the Sustainability Report, containing TIM's consolidated non-financial statement, pursuant to Legislative Decree no. 254/2016, based on the Sustainability

Reporting Guidelines of the Global Reporting Initiative.

This approval is preceded by a specific review by the Control and Risk Committee - which prepares financial and non-financial disclosure for the period - and by the Sustainability Committee. The material impacts and configuration of the European Taxonomy, the basis for 2023 reporting, were presented to the Control and Risk Committee and the Sustainability Committee in the joint meeting of 7 November 2023.

### [2-14 b]

Not applicable

### [2-15 a]

As stated in the Company's Self-Governance Principles, the members of the corporate bodies freely make their own choices, in the interests of the issuer and shareholders in general, giving timely disclosure of any extra-corporate interest they may have with respect to the operations submitted to them for decision-making, advisory, investigative or control purposes.

The Regulations of the Board of Directors, published on the Group's website, govern the methods of managing situations in which a director has an interest, on his own behalf or on behalf of third parties, in a specific transaction.

In compliance with the Consob Related Parties Regulation, the Company has also adopted a procedure for related-party transactions, which can be consulted on the Group website.

### [2-15 b]

The disclosure of related-party transactions in the reporting period is included in the Annual Financial Report, in the chapter on Related-party transactions.

## GRI 2 - GENERAL DISCLOSURE

### [2-16 a]

The Board of Statutory Auditors and the Control and Risk Committee of TIM are periodically informed, in a summary report, about whistleblowing activities carried out.

Every six months the Supervisory Body prepares a report, sent to the Company's top management and control bodies, which summarizes the activities carried out, as well as information on reports received and the main initiatives taken.

### [2-16 b]

In 2023, 152 reports were received in Italy and 1,447 in Brazil.

As regards Italy, the 152 complaints, of which 33 anonymous and 119 not anonymous, are grouped as follows:

- 53 within the scope of application of the whistleblowing procedure (for example: relations with suppliers, worker health and safety, alleged oppressive or discriminatory behavior, inadequate procedures or controls);
- 99 not falling within the scope of the procedure (complaints, requests for information and clarifications), however sent to the competent functions for relevant controls, with the outcome notified to the Audit Department.

Information on historical data is available at: [www.gruppotim.it/it/gruppo/governance/strumenti-governance/whistleblowing.html](http://www.gruppotim.it/it/gruppo/governance/strumenti-governance/whistleblowing.html).

In addition to the figures reported above (i.e., on whistleblowing), during the 2023 financial year, the Board of Statutory Auditors received 14 reports directly, mostly referring to complaints about poor technical service and commercial and administrative inefficiencies, as well as 4 complaints pursuant to Article 2408 of the Civil Code. The Board of Statutory Auditors carried out appropriate investigations on all the reports and complaints, with the support of

the competent offices of the Company.

In the case of Brazil, of the 1,447 reports, 669 were anonymous and 778 were not anonymous, classified as follows:

- 768 in the context of whistleblowing procedures;
- 468 customer reports (poor service)
- 211 unrelated to the objective of the procedure

### [2-17 a]

The Corporate Communication & Sustainability department constantly updates the Sustainability Committee on sustainable development issues, with the Chair reporting to the Board of Directors.

### [2-18 a]

The Board of Directors annually evaluates, through formalized procedures, its effectiveness and the contribution of individual Directors also with reference to ESG issues. The outcomes of this assessment are included in the annual report on corporate governance and ownership structures published on the Company's website ([www.gruppotim.it](http://www.gruppotim.it)).

### [2-18 b]

For the annual self-assessment of the Board of Directors and its Committees, the Company is assisted by an independent external advisor.

### [2-18 c]

Based on the evidence found, the Board of Directors identifies specific follow-up initiatives.

## GRI 2 - GENERAL DISCLOSURE

### [2-19 a]

The Directors' remuneration policy is defined in line with the law and statutory provisions on the basis of which:

- the Shareholders' Meeting determines the overall gross annual compensation of the Board of Directors (with the exception of Directors with special roles), the Statutory Auditors and the Chair of the Board of Statutory Auditors; it deliberates - with a binding vote - on the first section of the Remuneration Report and with a non-binding vote on the second section of the same Report; it decides on compensation plans based on financial instruments;
- the Board of Directors decides, upon proposal of the Nomination and Remuneration Committee, on the distribution of the compensation determined by the Shareholders' Meeting; it defines, upon proposal of the Committee, the remuneration policy of Executive Directors and key executives. The Board of Directors is also responsible for submitting proposals to the Shareholders' Meeting on compensation plans based on financial instruments, for directors and employees, and for preparing the Remuneration Report.

### [2-19 ai]

With the exception of the CEO, the directors only receive fixed remuneration.

More details at: <https://www.gruppotim.it/it/gruppo/governance/remunerazione/politica.html>. Details of the fixed and variable remuneration components (including any equity component), the benefits and the termination benefit assigned to the Chief Executive Officer and key executive managers are given in the Remuneration Report (for key executives the data is in aggregate form) and are available, in summary form, at:

<https://www.gruppotim.it/it/gruppo/governance/remunerazione/politica.html#tab2>

### [2-19 aii]

For key executives, the assignment of bonuses independent of performance conditions is excluded. TIM exceptionally reserves the right to pay lump sums during the hiring phase in order to encourage the acquisition of resources that have specific skills considered essential for the achievement of strategic business objectives and who have acquired the right to specific remuneration deferred by the Company they have left.

### [2-19 aiii]

There are no notice/severance payments for members of the Board of Directors. Any provisions relating to the position of General Manager, held by the CEO, remain unchanged.

The notice period for senior executives is established in the national collective bargaining agreement and differentiated according to length of service; this notice period may be a maximum of 12 months.

Severance payments for senior executives are established by law and by the national collective bargaining agreement, with a maximum 24 additional months.

Any mitigation clauses are included in the termination agreements. As per the policy, for Executive Directors, in the event of termination of the Directorship without just cause, the payment of an indemnity equal to the remuneration due for the office is envisaged, until the natural expiry of the mandate, with a maximum of 24 months' salary (calculated as the sum of the fixed component and MBO). As regards withdrawal from the employment contract, the severance pay established by law and by the national collective bargaining

## GRI 2 - GENERAL DISCLOSURE

agreement is envisaged, with the recognition of a maximum of 24 additional monthly payments (calculated on the fixed component). In the event of termination of the employment relationship of key executives, in the absence of just cause for dismissal, the CEO will be responsible for identifying the resources who - due to the relevance and strategic nature of the role held - may receive severance pay, which may be associated with a non-competition agreement, depending on the relevance and strategic nature of the role held, for a maximum period of one year calculated on the fixed remuneration.

### [2-19 aiv]

In the three years following the payment of the premium of the variable remuneration components, the claw back clause for the sums paid may be activated, as per the policy.

### [2-19 av]

Details of the components of fixed and variable remuneration (including any equity component), the benefits and the termination benefit for the CEO and key executives are given in the Remuneration Report (for key executives the data is in aggregate form) and are available, in summary form, at: <https://www.gruppotim.it/it/gruppo/governance/remunerazione/politica.html#tab2>

### [2-19 b]

The objectives assigned to the CEO for 2023 are of an economic-financial and ESG nature. Details are available at: <https://www.gruppotim.it/it/gruppo/governance/remunerazione/politica.html#tab2>

The TIM Group's remuneration policy is aimed at supporting the

achievement of the guidelines defined in the Company's Strategic Plan, adopting an adequate balance between performance parameters and short and long-term incentive systems to achieve strategic objectives.

The short and long-term incentive systems have both economic-financial objectives deriving from the three-year Business Plan, as well as objectives linked to the performance of the share price and ESG objectives.

Regarding the MBO system, for 2023, the ESG objective with a weight of 22% was confirmed, both for the CEO, for key executives and for all incentivized staff, highlighting the centrality of the two essential stakeholders for the Company - external customers (with Customer Satisfaction objectives) and employees (with Employee Engagement and Gender Pay Gap objectives).

Like the long-term incentive plans launched in 2020 and 2021, the 2022-2024 Stock Options plan also combines macro-economic and equity objectives with two growth objectives for the gender gap and renewable energy consumed, with a total weight of 30%.

### [2-20 ai]

The Remuneration Policy is approved by the Board of Directors, upon proposal of the Nomination and Remuneration Committee, composed exclusively of independent directors. This policy is reviewed by the Shareholders' Meeting which is called on to pass a binding vote.

### [2-20 aii]

TIM values dialogue with its shareholders and institutional investors on remuneration issues, aware of the relevance of

## GRI 2 - GENERAL DISCLOSURE

shareholder involvement both in the definition and verification of the implementation of the Policy for the remuneration of Directors and Key Executives.

The analysis of the shareholders' vote is particularly important. Dialogue with shareholders and institutional investors takes place through various communication tools and channels, including meetings, conference calls and the final shareholders' meeting, supported by the provision of detailed and complete information.

### [2-20 aiii]

To carry out its functions, the Committee (with meetings attended by the Chair of the Board of Statutory Auditors, or, if unable to do so, by another Auditor designated by the Chair) is assisted by relevant Company units and entities, and by external consultants independent of the members of the Board of Directors and the company's top management, if so required. Details of the activities are available at: <https://www.gruppotim.it/it/gruppo/governance/remunerazione/politica.html>

### [2-20 b]

The summary report of the votes of the shareholders' meeting on the items on the agenda, including the remuneration policy, is available on the Group's website. In particular, the results of the last Shareholders' Meeting - on remuneration policies and proposals - are available at: <https://www.gruppotim.it/it/investitori/azioni/agm/assemblea-20-aprile-23.html>

# GRI 2 - GENERAL DISCLOSURE

## Policy Code of Ethics and Conduct

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
The Global Compact	Based on a risk assessment, the Company provides for specific due diligence processes	Not explicitly required	Yes, the TIM Group adopts a specific policy for the protection of Human Rights and includes in its Code of Ethics and Conduct (new updated version approved by the Board of Directors on 15.03.2023) this commitment (see page 15 "In line with the Values that guide us, respect for Human Rights represents an essential requirement for us in carrying out our activities. To this end, we strive every day to operate while respecting, supporting and promoting universally recognized Human Rights and we encourage our Business Partners to become supporters of Human Rights themselves.")	By joining Global Impact, TIM S.p.A. ensures this institutional commitment is met in full	All stakeholders listed in the Group Code of Ethics and Conduct.

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
Code of Ethics and Conduct ( <a href="https://www.gruppotim.it/it/gruppo/governance/strumenti-governance/codice-etico.html">https://www.gruppotim.it/it/gruppo/governance/strumenti-governance/codice-etico.html</a> )	Code of Ethics and Conduct approved by the Board of Directors on 15 March 2023.	The commitments concern all the activities of the TIM Group for which the Code of Ethics and Conduct is directly applicable	Commitments are communicated to all stakeholders through the institutional website, the corporate intranet and the supplier portal, and also by appropriately including contractual clauses relating to the acceptance of and/or compliance with the Group Code of Ethics and Conduct. With specific reference to employees, during 2023, the following training/information initiatives were organized: - an additional training course - from 21.12.23 to 31.01.24 - which includes a special section dedicated to the changes introduced in the above-mentioned Code; - publication on the TIM S.p.A. intranet of videos presenting the new ethical values and a page dedicated to the code of ethics; - installation at the headquarters of information materials on the code of ethics such as: roll-ups, notices and a video wall; - sending newsletters to all employees regarding the updated Code of Ethics and Conduct; - organisation of a Compliance Day (during which the values of the Code of Ethics and Conduct were also addressed): top management of TIM and Subsidiaries, 1st, 2nd and 3rd reporting lines; - Webinar on the Code of Ethics/MO 231, for TIM managers (between June 2023 and October 2023).

# GRI 2 - GENERAL DISCLOSURE

## Policy Code of Ethics and Conduct

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiii	GRI 2-24 aiv
<p><b>Responsibility to achieve commitments</b></p>	<p><b>Integration of commitments in organisational strategies, policies and operating procedures</b></p>	<p><b>Putting commitments with and through business relationships into practice</b></p>	<p><b>Training</b></p>
<p>The members of corporate bodies and managers of the Group represent a model of responsibility and integrity on which the Group relies. They are committed to giving substance to the contents in the TIM Group's Code of Ethics and Conduct, setting the right example firsthand. The Group asks these corporate bodies and managers to transmit ethical values in their daily actions, and to maintain an ethical, respectful and inclusive work environment.</p> <p>TIM S.p.A. and the TIM Group companies also have an internal control and risk management system, in which the correct definition of tasks and responsibilities, the segregation of roles with a consistent approach to operational powers, the traceability of activities and operations, etc. are particularly important.</p> <p>The Internal Control and Risk Management System (SCIGR) is an essential part of the general organisational structure of TIM S.p.A. and its related group (hereinafter also the "TIM Group" or "Group") and consists of all organisational structures, rules and business procedures aimed at ensuring a concrete and effective process of identifying, measuring, managing and monitoring the main risks, in order to contribute to the sustainable success of the TIM Group, also through the definition of adequate information flows that encourage the coordination and circulation of information among the various players of the SCIGR.</p> <p>The TIM Group's Internal Control and Risk Management System is an integrated system that involves the entire organisational structure: corporate bodies and corporate entities alike are required to contribute to the functioning of the system, according to the scheme represented below and divided into a "three lines model", and namely:</p> <ul style="list-style-type: none"> <li>-Governance: entrusted to the Board of Directors, responsible for defining the guidelines of the SCIGR and assessing whether they are appropriate. In this context, the establishment and maintenance of the SCIGR are entrusted to the Chief Executive Officer ("CEO") and to the Manager responsible for drafting the Company's accounting documents ("Financial Reporting Officer"), for areas in their responsibility, so as to ensure the overall adequacy of the System and its actual functioning, from a risk-based perspective; they are therefore responsible for identifying first and second level risks and controls.</li> <li>-First level of control: entrusted to individual operating units, that identify, monitor and evaluate risks and define specific mitigation actions for their management, ensuring the proper performance of specific transactions/operations. These control activities are entrusted to the primary responsibility of Management and are considered an integral part of every business process.</li> <li>-Second level of control: entrusted to specific business functions other than line/operational functions, that contribute to the definition of risk measurement methods, as well as to their identification, evaluation and monitoring/verification. In addition, these functions support the first level of control in the definition and implementation of actions to mitigate main risks.</li> <li>-Third level of control: entrusted to the Audit Department, which provides independent assurance and evaluates the appropriateness of the design and the actual functioning of the SCIGR as a whole, also through the verification of line controls and second-level control activities.</li> </ul>	<p>The policies, procedures, regulations and internal instructions are aimed at ensuring that the values of the Code of Ethics and Conduct are reflected in the behaviour of the Group Companies and all its recipients. To this end, reporting and sanctions systems are in place and applied for any violations of the above-mentioned Code</p>	<p>TIM S.p.A. includes a special clause dedicated to review/ compliance with the Group's Code of Ethics and Conduct in contracts it has stipulated and carries out due diligence activities on Third Parties</p>	<p>Commitments are communicated to all stakeholders through the institutional website, the corporate intranet and the supplier portal, and also by appropriately including contractual clauses relating to the acceptance of and/or compliance with the Group Code of Ethics and Conduct.</p> <p>With specific reference to employees, during 2023, the following training/information initiatives were organized:</p> <ul style="list-style-type: none"> <li>- an additional training course - from 21.12.23 to 31.01.24 - which includes a special section dedicated to the changes introduced in the above-mentioned Code;</li> <li>- publication on the TIM S.p.A. intranet of videos presenting the new ethical values and a page dedicated to the code of ethics;</li> <li>- installation at the headquarters of information materials on the code of ethics such as: roll-ups, notices and a video wall;</li> <li>- sending newsletters to all employees regarding the updated Code of Ethics and Conduct;</li> <li>- organisation of a Compliance Day (during which the values of the Code of Ethics and Conduct were also addressed): top management of TIM and Subsidiaries, 1st, 2nd and 3rd reporting lines;</li> <li>- Webinar on the Code of Ethics/MO 231, for TIM managers (between June 2023 and October 2023);</li> <li>- video interview on the Code of Ethics, MO 231 and Anti-Corruption Policy for third parties, used by 111 senior accounts.</li> </ul>

# GRI 2 - GENERAL DISCLOSURE

## Policy Product and Service purchasing

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
This takes place indirectly through Group Policies such as the Code of Ethics and Conduct, the 231 Organisational Model, the Anti-Corruption Policy and the TIM Anti-Corruption Management System (SGA)	Yes, through processes of evaluation/control of suppliers and the selection of services/products, with specific operational methods. Also based on cooperation/agreements with partners, such as the Joint Audit Cooperation JAC initiative ( <a href="http://jac-initiative.com">http://jac-initiative.com</a> )	Not explicitly required	Yes	Throughout the entire supply chain, it ensures the Group's values of ethics and sustainability are complied with 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 person. To this end, contracts must always state that TIM S.p.A. and TIM Group Companies reserve the right to carry out controls and audits on suppliers and on their performance	All stakeholders

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
TIM Policy Acquisti di Prodotti e Servizi.pdf ( <a href="https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-fornitori/2020/TIM Policy Acquisti di Prodotti e Servizi.pdf">https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-fornitori/2020/TIM Policy Acquisti di Prodotti e Servizi.pdf</a> )	The following departments reporting directly to Management: Procurement, Human Resources, Compliance and Legal Departments	TIM Group Companies	The TIM Group is the recipient of the Policy

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiii	GRI 2-24 aiv
<b>Responsibility to achieve commitments</b>	<b>Integration of commitments in organisational strategies, policies and operating procedures</b>	<b>Putting commitments with and through business relationships into practice</b>	<b>Training</b>
The recipients of this Policy are TIM S.p.A. and the TIM Group Companies. The departments concerned are those which, in the above-mentioned companies, are responsible for the different stages of the purchasing process. In particular, at TIM S.p.A. the Departments concerned are: the Procurement Department, Users Department, Chief Financial Office, Legal and Tax	The Policy contents are valid for all Group Companies and are directly applicable to purchases made for Italian and foreign companies of the Group. For Group Companies that have not given TIM a purchase mandate or have given a partial mandate, this document is a "frame of reference" and it is therefore the responsibility of the Companies to adopt their own specific Policy for deploying this document	Throughout the supply chain, respect for the Group's ethical and sustainability values is ensured 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, contracts must always provide for TIM and TIM Group Companies to have the possibility to carry out controls and audits on suppliers and their performance, in compliance with the current regulatory and procedural framework	Where appropriate, and without prejudice to the independent responsibility of the supplier/partner, TIM may allow them access to specific training activities, with a view to mutual collaboration. This access may be, for example, to the Open-ES platform, which supports and guides suppliers in defining a plan for the growth of their ESG performance, the JAC Academy project, which, through a "supplier development programme", contributes to training suppliers on ESG issues, and provides tools for tiers 2 and 3 the involvement and evaluation

# GRI 2 - GENERAL DISCLOSURE

## Policy Anti-corruption

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
National and international regulations, such as the FCPA and UK Bribery Act	Yes, TIM S.p.A. carries out due diligence activities on third parties. This activity is also carried out with reference to Group suppliers. Due diligence is also carried out by subsidiary companies (domestic and TIM Brasil) that have an anti-corruption management system (SGA) in place certified in accordance with ISO 37001	Not explicitly required	The Anti-Corruption Policy does not specifically address Human Rights. Instead, these issues are covered in the appropriate Policy "Respecting Human Rights in the TIM Group" and in the Code of Ethics and Conduct	The Anti-Corruption Policy does not specifically address Human Rights. Instead, these issues are covered in the appropriate Policy "Respecting Human Rights in the TIM Group" and in the Code of Ethics and Conduct	The Anti-Corruption Policy does not deal with issues related to Human Rights, which are covered instead in the specific Policy "Respecting Human Rights in the TIM Group" and in the Code of Ethics and Conduct

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
Anti-Corruption Policy ( <a href="https://www.gruppotim.it/it/gruppo/governance/strumenti-governance/sistema-gestione-anticorruzione.html">https://www.gruppotim.it/it/gruppo/governance/strumenti-governance/sistema-gestione-anticorruzione.html</a> )	The latest version of the Anti-Corruption Policy was approved by the Board of Directors of TIM S.p.A. on 14 February 2022	The Group's Anti-Corruption Policy applies to TIM S.p.A. and to members of the corporate bodies, employees and external staff engaging in various capacities with the Company. The Policy applies to Subsidiaries of the TIM Group and to the TIM Foundation: listed domestic and foreign companies and companies certified in accordance with UNI EN ISO 37001 may transpose this Policy by defining their own policies in compliance with the principles set out below. In relation to joint ventures and Investee Companies, TIM will use its influence, as reasonable under the circumstances, to ensure that these entities comply with the standards and rules of conduct defined in the Group's Anti-Corruption Policy. The Policy is intended to be known by: - employees, management and members of TIM's corporate bodies - Subsidiaries and/or Investees - Third Parties - Certification Bodies	Commitments are communicated through: the institutional website, the corporate intranet, and also through the specific inclusion of contractual clauses relating to familiarity and/or compliance with the Group's Anti-Corruption Policy. In addition, TIM S.p.A. publishes on the Group's supplier portal the Code of Ethics and Conduct, the Anti-Corruption Policy and the Anti-Corruption Manifesto With specific reference to employees, during 2023, the following training/information initiatives were organized: - an additional training course - from 21.12.23 to 31.01.24 - which includes a special section dedicated to the changes introduced in the above-mentioned Code of Ethics also covering anti-corruption issues; - a Compliance Day (during which the topic of the Code of Ethics and Conduct was also addressed also covering anti-corruption issues): top management of TIM and Subsidiaries, 1st, 2nd and 3rd reporting lines; - Webinar on the Code of Ethics/MO 231 that also includes anti-corruption topics (target TIM managers - between June 2023 and October 2023).

# GRI 2 - GENERAL DISCLOSURE

## Policy Anti-corruption

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiij	GRI 2-24 aiv
<p><b>Responsibility to achieve commitments</b></p>	<p><b>Integration of commitments in organisational strategies, policies and operating procedures</b></p>	<p><b>Putting commitments with and through business relationships into practice</b></p>	<p><b>Training</b></p>
<p>The Board of Directors, after a prior review by the Control and Risks Committee, approves the Group's Anti-Corruption Policy. The Board of Directors has identified the Compliance Department as the Compliance Function for the prevention of corruption, responsible for the implementation and monitoring of the Anti-Corruption Management System within the company organization and, more generally, for the compliance of the SGA with ISO 37001:2016 requirements. The Compliance Department reports hierarchically to TIM's Board of Directors and has adequate resources and the authority and independence necessary to carry out the function. The Compliance Department/Compliance Function supports the 231 Steering Committee and TIM's Management in implementing the SGA, providing the following, among other things:</p> <ul style="list-style-type: none"> <li>- assistance and advice on the application of the Anti-Corruption Management System, the Group Anti-Corruption Policy and Anti-Corruption Laws, and any other provision regarding the prevention of corruption;</li> <li>- monitoring of the adoption and implementation of the SGA and the above-mentioned Policy;</li> <li>- assistance in carrying out Due Diligence activities.</li> </ul> <p>The Compliance Department participates, for areas in its responsibility, in handling reports of possible violations of the SGA, as defined by the Whistleblowing Procedure.</p> <p>Pursuant to the Anti-Corruption Management System (SGA) document, TIM has assigned the following company entities to oversee the SGA, to ensure the effectiveness of activities in preventing and combating corruption:</p> <ul style="list-style-type: none"> <li>- Board of Directors and the Control and Risks Committee</li> <li>- the 231 Steering Committee</li> <li>- the Compliance Department, as a compliance function for the prevention of corruption in accordance with ISO 37001</li> </ul> <p>In addition, in relation to the SGA, the following company positions and entities perform specific tasks:</p> <ul style="list-style-type: none"> <li>- Management and/or its members - Audit Department</li> <li>- Human Resources Organization &amp; Real Estate (HRO) and Security</li> <li>- 231 Supervisory Body</li> <li>- Compliance function officers of Subsidiaries</li> </ul> <p>The Board of Directors, department managers and all other employees are responsible for understanding, respecting and applying the SGA, in the context of their role at TIM</p>	<p>The Anti-Corruption Management System includes a structured set of objectives divided into three levels: strategic objectives; organisational objectives; operational objectives and planning</p>	<p>TIM S.p.A. includes a special "anti-corruption clause" in the contracts it has stipulated, requiring compliance with both the anti-corruption regulations and the adopted anti-corruption policies. Lastly, the Company carries out due diligence activities on Third Parties</p>	<p>Commitments are communicated through: the institutional website, the corporate intranet, and also through the specific inclusion of contractual clauses relating to familiarity and/or compliance with the Group's Anti-Corruption Policy. In addition, TIM S.p.A. publishes on the Group's supplier portal the Code of Ethics and Conduct, the Anti-Corruption Policy and the Anti-Corruption Manifesto. With specific reference to employees, during 2023, the following training/information initiatives were organized:</p> <ul style="list-style-type: none"> <li>- an additional training course - from 21.12.23 to 31.01.24 - which includes a special section dedicated to the changes introduced in the above-mentioned Code of Ethics also covering anti-corruption issues;</li> <li>- a Compliance Day (during which the topic of the Code of Ethics and Conduct was also addressed also covering anti-corruption issues): top management of TIM and Subsidiaries, 1st, 2nd and 3rd reporting lines;</li> <li>- Webinar on the Code of Ethics/MO 231 that also includes anti-corruption topics (target TIM managers - between June 2023 and October 2023);</li> <li>- video interview on the Code of Ethics, MO 231 and Anti-Corruption Policy for third parties, used by 112 senior accounts</li> </ul>

# GRI 2 - GENERAL DISCLOSURE

## Policy Human Resources and Equal Opportunity

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
The HRO function is indirectly engaged through other Group Policies (for example the Ethical Code of Conduct, the Policy Respecting Human Rights and the Group Organisational Model...)	Yes, the commitments include due diligence because all activities that may negatively affect respect for Human Rights are subject to periodic internal due diligence, carried out on the basis of the Guiding Principles on Business and Human Rights, approved by the UN Human Rights Council in June 2011	If a potential risk situation regarding the topic of Human Rights is identified in the self-assessment process, the function concerned is required to communicate the relevant action plan for the purpose of monitoring its progress	The TIM Group is committed to being a proactive leader both at local and international level, and in its own and other related sectors	The TIM Group respects the ten principles of the United Nations Global Compact	The Group's commitment to Human Rights is reflected in the Code of Ethics and Conduct and in all relevant policies, such as those concerning Human Resources, Sustainability in the TIM Group, suppliers and customers, in particular the most vulnerable (e.g. minors and the disabled)

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
TIM Policy Risorse Umane e Pari Opportunità.pdf ( <a href="https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-diritti-codici-e-politiche/Policy%20HR%20e%20Pari%20Opportunit%C3%A0.pdf">https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-diritti-codici-e-politiche/Policy%20HR%20e%20Pari%20Opportunit%C3%A0.pdf</a> )	The TIM Group Human Resources and Equal Opportunities Policy was approved by the Gender Equality Steering Committee in September 2023	All people of the TIM Group and “workers” of its value chain	The Policy has been communicated to the people of the TIM Group and is present on the institutional website

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiii	GRI 2-24 aiv
<b>Responsibility to achieve commitments</b>	<b>Integration of commitments in organisational strategies, policies and operating procedures</b>	<b>Putting commitments with and through business relationships into practice</b>	<b>Training</b>
Although responsibility for the policy lies with the HRO Director, managers are responsible for creating and sustaining an environment in which people can best express their human and professional qualities	The Policy is the reference for and covers all organisational strategies, policies and operating procedures	The Policy covers all business relationships. The Policy covers all business relationships	The Group encourages all its stakeholders to provide feedback on the policy, in order to improve it. After the publication of the Policy, an online course was created for the entire corporate population, and has been available since the end of 2015. The course, updated in autumn 2018, has been included in the TIM Academy e-learning platform for Group employees

# GRI 2 - GENERAL DISCLOSURE

## Policy Respecting Human Rights in the TIM Group

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
All external references to the TIM Group are listed in the Policy itself	TIM completed its due diligence on Human Rights in 2014 using the OCAI (Organisational Capacity Assessment Instrument) tool	Not explicitly required	Basically everyone, with considerable attention paid to individuals impacted by TIM's core business (e.g. protection of the privacy of customers and employees, the right to freedom of expression - especially online freedom, etc.)	All internationally recognized Human Rights	All stakeholders, including vulnerable categories (e.g., minors, the elderly, the disabled, supplier workers, etc.)

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
<a href="https://www.gruppotim.it/content/dam/telecomitalia/documents/Sostenibilita/it/Politiche/policy-diritti-umani.pdf">policy-diritti-umani.pdf</a> ( <a href="https://www.gruppotim.it/content/dam/telecomitalia/documents/Sostenibilita/it/Politiche/policy-diritti-umani.pdf">https://www.gruppotim.it/content/dam/telecomitalia/documents/Sostenibilita/it/Politiche/policy-diritti-umani.pdf</a> )	Chairman of the Board of Directors, 29 September 2015	TIM Group activities and related value chain	The policy - written in Italian, English and Portuguese - has been communicated to people, suppliers and partners of the TIM Group through the institutional website

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiii	GRI 2-24 aiv
<b>Responsibility to achieve commitments</b>	<b>Integration of commitments in organisational strategies, policies and operating procedures</b>	<b>Putting commitments with and through business relationships into practice</b>	<b>Training</b>
The Human Resources & Organization Department is responsible for complying with this document with regard to the involvement of TIM people; the Procurement Department is responsible for its compliance in relation to the involvement of TIM's suppliers; the Compliance Department oversees the risk of non-compliance with applicable regulations; the Sustainability Department is responsible for updating the policy, involving interested parties	All functions of the TIM Group are requested to explicitly refer to this policy in their own policies, operating procedures and management systems	The TIM Group supports and encourages its partners to approve the main applicable intergovernmental policies (e.g. the UN International Bill of Human Rights, the Declaration on Fundamental Principles and Rights at Work, issued by the ILO, etc.)	Online information/training course on Human Rights and more

# GRI 2 - GENERAL DISCLOSURE

## Whistleblowing Procedure

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
All external references to the TIM Group are listed in the Policy itself	The procedure does not involve due diligence processes by external bodies	Not applicable	The Whistleblowing procedure governs the process of receiving and managing reports also related to the violation of human rights	The procedure covers human rights, as defined in the Group Policy on Human Rights	Recipients of the Procedure are: - top management and members of corporate bodies and the Supervisory Body of TIM S.p.a. (hereinafter TIM) and of Subsidiaries; - employees, former employees and candidates for job positions, partners, customers of TIM and of Subsidiaries, as well as - but not limited to - partners, suppliers (also under contracts/subcontracting), consultants, external staff in carrying out their work activities at TIM and/or Subsidiaries, who have information on violations as defined in this Procedure. Recipients also include natural and legal persons, not included in the previous categories but to whom the protection measures provided for in this Procedure apply.

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
<a href="https://www.gruppotim.it/content/dam/gt/gruppo/governance/doc-governance/italiano/Procedura-Whistleblowing.pdf">Procedura-Whistleblowing.pdf (https://www.gruppotim.it/content/dam/gt/gruppo/governance/doc-governance/italiano/Procedura-Whistleblowing.pdf)</a>	The current whistleblowing procedure was approved by TIM's Board of Directors on 22 June 2023	The procedure applies to any business relationship	On the occasion of the issue of the new Whistleblowing procedure, the following communication and training initiatives were carried out: <ul style="list-style-type: none"> <li>• Information to the entire company population;</li> <li>• Updates to TIM websites (internal and external) and the websites of Group Companies;</li> <li>• Posting of an information flyer at all company sites;</li> <li>• Mandatory e-learning training for the entire corporate population ("New Code of Ethics, MO231 and Whistleblowing of the TIM Group");</li> <li>• Information to trade unions and their representatives;</li> <li>• Inclusion of links to the Whistleblowing Page also on commercial sites and on the platform used by suppliers;</li> <li>• Updates to privacy obligations</li> </ul>

# GRI 2 - GENERAL DISCLOSURE

## Procedura Whistleblowing

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiii	GRI 2-24 aiv
<p><b>Responsibility to achieve commitments</b></p> <p>The Whistleblowing procedure governs the process of transmitting, receiving, analysing and managing reports concerning the TIM Group, and is overseen by the Supervisory Bodies of each of the Group's companies, without affecting the responsibilities and prerogatives of the Boards of Statutory Auditors for reports addressed to them. In order to follow up Reports, the Supervisory Bodies of TIM and Subsidiaries are assisted by TIM's Audit Department.</p> <p>The commitments defined following the in-depth analysis of reports are assigned to the heads of relevant departments, whose objectives are to meet the agreed deadlines for resolving critical issues.</p>	<p><b>Integration of commitments in organisational strategies, policies and operating procedures</b></p> <p>The whistleblowing procedure covers all organisational strategies, policies and operating procedures</p>	<p><b>Putting commitments with and through business relationships into practice</b></p> <p>The whistleblowing procedure covers all business relationships</p>	<p><b>Training</b></p> <p>As part of continual professional development on the subject of Organisational Model 231, reference is made to the Whistleblowing procedure.</p> <p>In addition, during 2023, on the occasion of the issue of the new Whistleblowing procedure, the following communication and training initiatives were carried out:</p> <ul style="list-style-type: none"> <li>• information to the entire company population;</li> <li>• updates to TIM websites (internal and external) and the websites of Group Companies,</li> <li>• posting an information flyer at all company sites;</li> <li>• mandatory e-learning training for the entire corporate population ("New Code of Ethics, MO231 and Whistleblowing of the TIM Group")</li> </ul>

# GRI 2 - GENERAL DISCLOSURE

## Tax Strategy

GRI 2-23 ai	GRI 2-23 aii	GRI 2-23 aiii	GRI 2-23 aiv	GRI 2-23 bi	GRI 2-23 bii
<b>Intergovernmental reference instruments</b>	<b>Due diligence</b>	<b>Application of the precautionary principle</b>	<b>Respect for Human Rights</b>	<b>Internationally recognised Human Rights</b>	<b>Stakeholders that TIM focuses on in particular</b>
OECD "Co-operative Compliance - A Framework: From Enhanced Relationship to Co-operative Compliance"; OECD GUIDELINES "Building better tax control frameworks"	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

GRI 2-23 c	GRI 2-23 d	GRI 2-23 e	GRI 2-23 f
<b>Link</b>	<b>Approved or last update</b>	<b>Extending the commitment</b>	<b>Communication of commitments</b>
TIM Tax Strategy Policy ( <a href="https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-diritti-codici-e-politiche/TIM-Tax-Strategy-2023.pdf">https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-diritti-codici-e-politiche/TIM-Tax-Strategy-2023.pdf</a> )	Board of Directors' Meeting of 15 December 2022	TIM Group	The webinar has been published on the Group's institutional website

GRI 2-24 ai	GRI 2-24 aii	GRI 2-24 aiii	GRI 2-24 aiv
<b>Responsibility to achieve commitments</b>	<b>Integration of commitments in organisational strategies, policies and operating procedures</b>	<b>Putting commitments with and through business relationships into practice</b>	<b>Training</b>
TIM S.p.A. and TIM Brazil have adopted a tax risk management and control system which includes a governance model to ensure that: i) top management is informed of the tax impacts related to all strategic operations and operational business activities, planned and to be carried out, to ensure that business decisions are consistent with the defined tax strategy; ii) the Tax Department is involved in carrying out ordinary and extraordinary business activities, to ensure a prior assessment of the tax implications of these activities and the correct management of the tax variable	To ensure effective control of tax risk, TIM S.p.A. and TIM Brazil have a tax risk detection, measurement, management and control system in place (Tax Control Framework), governed by a specific tax policy, which provides for the following: 1. a clear attribution of roles and responsibilities; 2. effective procedures for the detection, measurement, management and control of tax risks; 3. effective internal procedures aimed at ensuring, at all business levels, compliance with tax obligations; 4. effective procedures to remedy any deficiencies found in the functioning of the system and to activate the necessary corrective actions; 5. reporting to management bodies, through a report made at least annually on the activity carried out	The TIM Group does not carry out transactions that mainly pursue a tax advantage and that do not respond to business logic, i.e. transactions carried out "artificially" with the sole purpose of reducing taxation. In addition, TIM, as part of its business activity, has adopted procedures to qualify its counterparties (customers and suppliers), also for the purpose of preventing the commission of tax offences	The TIM Group trains and supports all personnel involved in the management of tax-relevant activities, which are not just limited to resources dedicated specifically to tax matters, in order to ensure that all employees have the right skills and experience to meet their responsibilities

## GRI 2 - GENERAL DISCLOSURE

### [2-25 a, b, c, d, e]

The Company provides reporting channels other than the whistleblowing channel, such as those below.

(i.) regarding health, safety and the environment:

- an internal reporting channel, accessible to each department manager of the Company, in relation to the Health, Safety and Environment component, implementing the Regulation "Employer delegations regarding safety and health in the workplace and environmental protection - checks on the work of delegated persons";
- reporting channels that can be activated by ARPA and/or ASL to report any episodes of environmental pollution (acoustic, atmospheric, electromagnetic, soil, subsoil and waste, etc.) to TIM S.p.A. - an internal reporting channel for complaints deriving from construction site and network maintenance activities (noisy manhole covers, breakdown of underground utilities on construction sites, etc.);

(ii.) regarding security:

- an internal reporting channel through which employees who become aware of a security vulnerability in systems, corporate applications or TIM branded products accessible from the Internet can send a report to: [segnalaci-una-vulnerabilita@telecomitalia.it](mailto:segnalaci-una-vulnerabilita@telecomitalia.it);
- a portal for reports of security incidents, which concern human, material and immaterial resources;

- a channel that ensures 24-hour monitoring of critical events and the management of IT security incidents in conjunction with relevant functions;
  - a form dedicated to reports relating to episodes of "abuse", to be understood as "any activity committed on the network and/or through the use of TIM Group assets for the purpose of committing crimes or causing damage to third parties, in violation of company rules and/or legislative provisions";
  - a channel for reporting spam emails accessible via employee inboxes;
- (iii.) regarding customer care:
- reporting channels (human and non-human) for network malfunctions and/or other inefficiencies.

### [2-26 ai]

The methods for requesting clarification on responsible corporate conduct which come under whistleblowing are provided for in the specific procedure<sup>(1)</sup>.

<sup>(1)</sup> The new whistleblowing procedure (issued on 22 June 2023) applies to TIM and its Subsidiaries, which guarantee the procedure is properly adopted at all times, and disseminated internally and externally as far as possible, respecting the autonomy and independence of each Company. The document is also a reference for other subsidiaries of the TIM Group not covered by the scope of application.

It should be noted that the term Subsidiaries means the subsidiaries of the TIM Group, excluding listed and foreign companies, to which this Procedure directly applies. Specifically, during 2023, the following companies adopted the new whistleblowing procedure: TIM S.p.A, TIM Ventures, TIM Retail, TI Sparkle, Olivetti, Telecontact center, Telenergia, Telsy, TI Trust Technologies, Fondazione TIM, Noovle, FiberCop, Staer Sistemi, TIM my broker, TS Way.

## GRI 2 - GENERAL DISCLOSURE

### [2-26 aii]

The methods for sending reports are indicated on the Whistleblowing Portal (available at <https://portalesegnalazioni.telecomitalia.it/>).

In Brazil, TIM S.A. provides the “whistleblowing channel” in two languages (Portuguese and English), accessible via the Internet or through the company intranet ([tim.com.br](http://tim.com.br) and [ri.tim.com.br](http://ri.tim.com.br) > ESG > Governança > Canal de Denúncias), or on the number (0800 900 8007), available 24 hours a day, 7 days a week. Complete information is available at: [site.tim.com.br/sp/canal-de-denuncias](http://site.tim.com.br/sp/canal-de-denuncias)

## GRI 2 - GENERAL DISCLOSURE

### [GRI 2-27 a]

TIM S.p.A.	2023	2022
Cases in which TIM incurred in a fine	5	3
Cases in which TIM received a non-monetary sanction	1	0
Total number of cases of non-compliance with laws and regulations	6	3

### [GRI 2-27 b]

TIM S.p.A.	2023	2022
Total number of fines paid for non-compliance with laws and/or regulations	5	3
Monetary value of fines paid	3,365,776	1,794,000

### [2-27 c]

In Italy, with reference to unfair commercial practices, at AGCM (the Competition and Market Authority), the “Giga increase” proceeding PS12384 relating to a tariff remodulation for mobile offers was concluded in February 2023 with a fine of 2.1 million euros. In March 2023, the “Post-withdrawal invoicing” proceeding PS12304 was concluded, relating to cases of anomalous invoicing following withdrawal, with a fine of 200 thousand euros.

With reference to the Antitrust proceedings at AGCM (the Competition and Market Authority), the proceeding I857 relating to the agreements with DAZN was concluded in June 2023, with a fine of approximately 760 thousand euros for TIM. In December 2023, proceeding A556, relating to the Consip TM9 tender for mobile telephony services, was concluded without the application of a fine. AGCM, in fact, decided that, on the basis of the elements collected

during the investigation, the conduct complained of against TIM did not constitute an abuse of a dominant position.

With reference to the consumer protection proceedings at AGCOM, the proceeding Cont 6/23/DTC relating to the failure to deactivate a line was concluded in August 2023, with a fine of 50 thousand euros. In December 2023, the proceeding Cont 7/23/DTC relating to the method of using the data component in TIM mobile offers was concluded, with a fine of 250 thousand euros.

During 2023, the Data Protection Authority did not conduct any inspection activities at TIM S.p.A., while it adopted a single prescriptive measure and sanction for telemarketing and other issues (purchase of lists from list providers, publication of data in telephone directories, processing customer privacy requests). While

## GRI 2 - GENERAL DISCLOSURE

positively evaluating the actions implemented by TIM to strengthen the control system for the telemarketing process, the Authority essentially accused TIM of violating the principle of accountability due to insufficient control of the supply chain, with particular reference to the activities of unauthorized agents making contractual proposals. In fact, the Authority still holds TIM (data controller) responsible for the unlawful activities committed by individuals who promote TIM services even if they do not belong to its official sales network since TIM itself appears to enjoy the economic benefits of the activated contracts.

The amount of the fine was 7.63 million euros, which TIM S.p.A. did not pay having challenged the measure before the Court of Milan, requesting its annulment, with a simultaneous request for suspension of the enforcement of the provision (prescriptive and sanction). The main reason for the appeal is the fact that the principle of accountability cannot be extended excessively to the unlawful actions of unknown persons not belonging to an own sales network.

The Court of Milan upheld TIM's appeal: with a decree dated

3/07/2023 it granted an initial suspension of the effectiveness of the Measure until 16/01/2024. This suspension was confirmed with an order dated 17/01/24 (due to the lack of the specific nature of the alleged violations, insufficient proof of the alleged violations and of their traceability to TIM, the generic nature of the corrective measures imparted, a lack of elements justifying the amount of the fine), with a hearing set for 11/11/2024.

Finally, in 2023, the Data Protection Authority did not impose any sanctions against the other companies of the Domestic BU, on which the information collection process was carried out.

### [2-27 d]

During the reporting period, no tax penalties exceeding 100,000 euros were paid relating to the Domestic BU.

## GRI 2 - GENERAL DISCLOSURE

### [GRI 2-27 a]

BU Brazil	2023	2022
Cases in which TIM incurred in a fine	399	93
Cases in which TIM received a non-monetary sanction	11	13
Total number of cases of non-compliance with laws and regulations	410	106

### [GRI 2-27 b]

BU Brazil	2023	2022
Total number of fines paid for non-compliance with laws and/or regulations	8	6
Monetary value of fines paid	18,861,320	820,000

### [2-27 c]

In Brazil, in 2023, TIM S.A. recorded 410 significant cases of non-compliance with laws and regulations, for a total amount of 18.8 million reais:

378 cases involved administrative sanctions relating to environmental liabilities linked to authorization processes by municipal or state authorities, of which 2 generated non-monetary sanctions. No fines were paid during the year.

10 significant administrative proceedings at Anatel related to non-compliance with laws and regulations. During the year, fines of 3.7 million reais were paid relating to proceedings from previous years.

22 significant cases relating to consumer rights; during the year, 2 fines were paid for a total of 15.1 million reais relating to the years 2012 and 2018.

### [2-27 d]

TIM, in Brazil, considers the cases as significant based on the impact on the business and the fines exceeding 500 thousand reais.

### [2-28 a]

Ecorating: a consortium made up of international TLC operators that evaluates the environmental impact of smartphones to help customers make sustainable choices and encourage suppliers to reduce the environmental impact of their devices.

ETNO: Since 1992 we have been part of the European association of telecommunications network operators whose mission is to develop a regulatory environment that favors the provision of services for citizens and businesses. ETNO wants to ensure that the role of fixed and mobile ultra broadband networks is fully reflected in European and national plans for a low environmental impact economy, in line with the European Digital Agenda.

## GRI 2 - GENERAL DISCLOSURE

ETSI (European Telecommunications Standards Institute): the main European standardization organization for telecommunications.

European Green Digital Coalition Since September 2022, we have been part of the alliance formed by the main European companies in the ICT sector to enhance the role of digitalization in reducing CO2 emissions through innovative technologies with low environmental impact.

GSMA (Global System for Mobile Communications Association): an international association that brings together the main mobile operators and develops studies on the positive contribution of technology in reducing greenhouse gas emissions and achieving sustainable development goals.

Open-es: a system alliance which aims to detect the sustainability performance of its suppliers, strengthen the qualification process with market ESG standards and build shared growth paths.

ITU: Since 1970 we have been members of the United Nations Agency which has the objective of coordinating global telecommunications activity.

JAC (Joint Audit Cooperation): We founded the international association of telecommunications operators that tests, evaluates and develops the implementation of sustainability in the supply chain of the information communication technology industry.

GeSI: Since 2008, we have been partners of the international association for digital transformation which provides members working in the ICT sector with a unified voice towards stakeholders, policy makers and institutional communities in the sector.

Global Compact: Since 2002, we have been among the 15 founding

promoters of the Global Compact Network Italy which promotes and disseminates at a national level the adoption of the Ten Principles of the UN Global Compact on the subject of human and labor rights, environmental protection and corruption and which is committed to advancement of the global Sustainable Development Goals (SDGs) to eradicate extreme poverty, spread peace and promote prosperity and human development by 2030.

Parks Liberi e Uguali: an association that brings together employers for the development of D&I strategies and practices with a prevalent focus on the area linked to sexual orientation and gender identity.

ValoreD: a business association in Italy which has been a pioneer on the issues of gender equity and culture of inclusion since 2009.

Furthermore, in Brazil, TIM S.A. has roles in the governance of:

ABR - [www.abrtelecom.com.br](http://www.abrtelecom.com.br)

Conexis - [www.conexis.org.br](http://www.conexis.org.br)

Telebrasil - [www.telebrasil.org.br](http://www.telebrasil.org.br)

ConectarAgro - [www.conectaragro.com.br](http://www.conectaragro.com.br)

### [2-29 ai]

In 2023 the categories of stakeholders were confirmed:

1. People from TIM and Trade Unions
2. Financial community
3. Customers
4. Business community by sector
5. Bodies and Institutions
6. Business partner
7. Civil society
8. Media

## GRI 2 - GENERAL DISCLOSURE

### [2-29 aii]

As a company strongly integrated in the territory and in the social, economic and production fabric, we believe it is essential to have a constant relationship with our stakeholders, i.e. with all the people and organizations who in various capacities are involved in our activities, in order to have an updated understanding of their expectations and at the same time a forward-looking vision of possible developments in scenarios.

### [2-29 aiii]

For each group of uniform stakeholders, the most appropriate engagement tools are identified, ranging from one-to-one meetings, one-to-many meetings (the company meets multiple stakeholders at the same time), information sessions, joint projects, surveys, focus groups, etc.

Depending on the level of involvement, we group the different types of relationships into the following categories: Information, Consultation, Dialogue, Partnership.

The needs of each stakeholder, provided through feedback to TIM, are analyzed, followed by a study of the possible solutions that TIM can offer to satisfy these needs. During this stage, the Company evaluates the risks and opportunities deriving from each prospective solution, the gaps to be filled to implement the solution, and the effort required to adopt the solutions. Depending on the relevance of the stakeholder to TIM's core business, these considerations come into play both in the strategies and operations of the Company at

the highest level, and in the strategies and operations of a particular business unit or line.

### [2-29 BU Brasile]

In Brazil, TIM S.A. steers its actions for involvement and relationships with its main target audience on the basis of the engagement policy, which provides a set of principles that seek to enhance dialogue and transparent communication to build solid relationships of quality, and ethics. In building its ESG agenda and the materiality matrix, which is reviewed periodically, on average every 2 years, TIM S.A. follows these guidelines to dialogue with its stakeholders<sup>(1)</sup>.

The engagement policy also highlights the points to consider in communication processes with stakeholders:

- Definition of clear, accessible and adequate communication channels for the reality of the communities and TIM S.A.
- Transparency in the management process to address internal or community requests.
- Effectiveness in maintaining a complete and regularly updated database.
- Commitment to managing requests and seeking common, effective and timely solutions.

<sup>(1)</sup> Main stakeholders of TIM S.A.: shareholders, employees, local communities, competitors, customers, suppliers, government and regulatory bodies, financial institutions, unions, consumer associations, civil society

## GRI 2 - GENERAL DISCLOSURE

### [2-30]

100% of TIM Group workers are covered by collective bargaining agreements.

All workers are covered by collective bargaining agreements stipulated between employers and trade unions: all personnel are guaranteed the possibility of participating in trade union meetings, in terms of hours of paid leave and company spaces or IT tools that allow them to take place, as well as freely participating in consultations for the election of union representatives. In none of the Group's operations is the right to union participation at risk or called into question. Applicable regulations specify, among other

things, the methods for exercising the rights and establish the bodies that control respect for these rights.

### [2-30 a]

100% TIM Group

### [2-30 b]

The relevant collective bargaining agreement applies to all employees.

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# MATERIAL TOPICS

## PROCESS FOR DETERMINING MATERIAL TOPICS

### [3-1 ai]

In accordance with the most recent provisions of the Global Reporting Initiative's international standards, TIM has adopted the impact relevance criterion, assessing the actual or potential impact that the Group can generate for each topic on society and the surrounding environment.

The topics were preliminarily selected through an analytics platform that, in real time, collects and analyses a substantial number of documentary sources from the industry and from any organisation relevant to the TIM Group's business, and monitors the main social media, guaranteeing a solid and constantly updated information base.

An initial risk analysis was carried out to ensure that no topics considered relevant by the risk management system in relation to ESG issues were overlooked.

For each topic, mapped in this way, the impacts (negative or positive, actual or potential) that the Group may have on the economy, the surrounding environment and people were identified, analysing the Group's activities, its business relations and the possible effects generated or induced directly or indirectly.

### [3-1 aii]

Top Management identified the key stakeholders that general engagement activities will refer to, to assess the impacts associated with potentially relevant topics.

Based on the accountability AA1000SES standard, top managers carried out a qualitative assessment on the relevance of the relationship with each stakeholder category in terms of 'dependence', 'influence' and 'urgency'.

The engagement activity and analysis of impact priorities directly involved stakeholders, the top management of TIM and members of the Sustainability Committee, who were asked to assess the relevance of the material topics for TIM based on impact.

Stakeholders were engaged in order to ask them to give an impact assessment for each topic, and then qualify the topics according to their increasing impact relevance.

The material topics were consolidated on the basis of appropriately weighted findings of documentary analysis, listening to stakeholders, the choices made by top management, after a consistency check against Legislative Decree 254/2016 and the most relevant risk issues mapped by ERM.

### [3-1 b]

A significant sample of representatives from all stakeholder categories, top management and members of the Sustainability Committee was involved by conducting almost 1,000 interviews face to face, or online, to identify and measure the impacts associated with each topic. Responses from external stakeholders were appropriately weighted according to the relevance of the category indicated by top management.

The process was carried out interacting constantly with the enterprise risk management department and the use of a constantly updated information base, both in relation to documentary sources and to the media as a source of stakeholder feedback.

# MATERIAL TOPICS

## LIST OF MATERIAL TOPICS

### [3-2 a]

The 2023 materiality analysis resulted in the identification of 10 material topics. Below is the list of the material topics sorted by impact relevance with evidence of the type of impact.

### [3-2 b]

In 2023 there were no substantial changes from the previous year;

in particular, some 2022 topics (e.g. Management of the legal and regulatory environment, Resilience to physical, public health and socio-political risks, Cyberbullying, child pornography, online gambling) were reclassified and merged with other topics. On the other hand, the topic of Ethics and Corporate Governance was relevant.

2023 Material Topics	Impact		SDGs
PRIVACY AND CYBERSECURITY	Negative	Potential	 
DIGITAL TRANSFORMATION AND INCLUSION <sup>(1)</sup>	Positive	Actual	   
CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES	Positive	Actual	
CLIMATE CHANGE	Negative	Actual	   
USE OF RENEWABLE ENERGY SOURCES <sup>(2)</sup>	Positive	Actual	   
EQUAL PAY AND OPPORTUNITIES AT TIM	Positive	Potential	  
WORKER HEALTH AND SAFETY	Negative	Actual	
INFRASTRUCTURES AND EMERGING TECHNOLOGIES	Positive	Actual	  
ETHICS AND CORPORATE GOVERNANCE	Negative	Potential	 
SUSTAINABLE SUPPLY CHAIN	Positive	Actual	  

<sup>(1)</sup> In 2022, the topic was called «Digital Inclusion»

<sup>(2)</sup> In 2022, the topic was called «Energy Transition»

# MANAGEMENT OF MATERIAL TOPICS

## PRIVACY AND CYBERSECURITY

### NEGATIVE IMPACT - POTENTIAL

#### [3-3 a, b]

Companies in the TLC sector manage a vast volume of data and sensitive information. Any attacks and security breaches can have serious consequences, including unauthorized access, destruction or unauthorized disclosure of data and therefore generate a negative impact on the privacy of the people involved and on the IT security of data and information. The organization may be involved in negative impacts, through its core activities.

#### POLICY AND COMMITMENTS

#### [3-3 c]

- System of Rules
- Privacy Laws
- Cybersecurity policies and procedures

#### KPIs

#### [3-3 e]

- Reports of privacy violations - Guarantor and customers
- No. of data leaks detected
- No. of security incidents
- No. of training hours

#### PLAN TARGETS

#### [3-3 e]

- Containment of requests received from the Privacy Guarantor
- Monitoring of requests to exercise customers' privacy rights made to Customer Care or to DPO;
- Containment of data breaches with loss of customer data

#### PROGRESS VS TARGET

#### [3-3 e]

##### Domestic

- 5 security incidents (none with a medium-high impact)
- Over 3,000 hours of training on privacy for over 1,200 employees and approximately 48,000 hours on cybersecurity for approximately 23,000 employees

##### Brasile

- 1000 (vs 600 in 2022) requests received relating to the processing of data subjects
- Over 2500 training hours for approximately 2500 employees

#### ACTIONS

#### [3-3 d, e]

##### Domestic

- Implementation of the privacy operating model
- Consultancy and specialist support to Functions / Companies of TIM Group
- Opinions regarding privacy impact assessments
- Coordination of obligations relating to the management of data breaches
- Identification of new vulnerabilities as part of testing and vulnerability assessment activities
- Research and innovation activities for cybersecurity and, more generally, for information and network security

##### Brazil

- Numerous initiatives compliant with best practices, standard and regulations (LGPD) implemented
- Renewal of ISO 27001 certification
- Cyber risk management according to the Cybersecurity Framework (NIST)
- IT security risk analysis
- Presence of the Data Protection Officer and ICT Security Committee

#### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- ISO/IEC 27001
- ISO 27035
- 3-tier control system for Privacy and a macro-process to manage "security events" for IT

*The certifications awarded represent the continual improvement of the processes and procedures implemented.*

*In 2023, 99.9% of Domestic BU cybersecurity incidents were contained/mitigated.*

17 PARTNERSHIPS FOR THE GOALS



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



## PRIVACY AND CYBERSECURITY

### COLLABORATIONS

#### [3-3 f]

- Membership of the new Telecommunication Information Sharing and Analysis Center (T-ISAC; which confidentially collects information on security incidents in the mobile community)
- Chairing the security working group of the O-RAN ALLIANCE
- Initiative for the creation of the Information Sharing and Analysis Center of Italian Telcos (TELCO-ISAC)
- Research partnerships with the Polytechnic of Milan (security analysis of equipment and use of Natural Language Processing in the automatic processing of Cyber Threat Intelligence reports).

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Privacy and cybersecurity	privacy / cyber	High

#### Risk calculation methodology

##### Privacy:

- Methodology: Monte Carlo Simulation – Variables: Sanctions applied by the Authority to other companies/groups and to TIM, TIM Domestic Turnover, Frequency of Authority audits on TIM, Compliance Assurance findings.

##### Cyber:

- FAIR (Factor Analysis of Information Risk) methodology with Monte Carlo simulation engine.
- Variables: Common Platform Enumeration (CPE); Common vulnerabilities and Exposures (CVE); Exposure to the Internet; Database size; Recovery Point Objective; Recovery Time Objective; Business Impact Analysis; Aging HW e SW; Benchmark of frequency and impact of occurrence.

#### Activities performed

##### Privacy:

- Compliance Assurance findings analysed in order to define the vulnerability level of TIM processes.
- Continual benchmarking with regard to the levels of sanctions applied nationally for non-compliance with privacy regulations.
- Quantitative risk valuation model applied.

##### Cyber:

- Engineering of a transversal process for analysing, assessing and monitoring cyber risks, integrated with vertical Risk Management Security activities as well as technical IT activities.
- Quantitative model of the economic-financial valuation of risks applied ad prioritisation of ICT security investments for Cyber risk mitigation.
- Continuous monitoring and testing of applications to identify their vulnerabilities.
- Insurance risk transfer process optimised by assessing catastrophic impacts.

## PRIVACY AND CYBERSECURITY

### [GRI 418-1a, 418-1b] TIM S.p.A.

Substantiated complaints regarding breaches of customer privacy and loss of customer data	2023	2022	2021
Requests received from the Data Protection Authority (number of cases/complaints reported)	14	85	70
Replies to requests to exercise customer privacy rights addressed to TIM's Customer Care	102,928	157,747	284,830
- of which replies to requests to exercise privacy rights addressed by TIM customers directly to the Data Protection Officers	3,388	3,489	2,797
Total detected number of customer data leaks, thefts or losses	2	1	0

As regards other TIM Group companies with a DPO (Data Protection Officer), based on the data provided by the Companies, final data for 2023 are as follows:

### [GRI 418-1a, 418-1b] BU Domestic

	2023	2022
Requests received from the Data Protection Authority (number of cases/complaints reported)	0	0
Replies to requests to exercise customer privacy rights addressed to Group companies	22	18
- of which replies to requests to exercise privacy rights addressed by customers directly to the mail boxes of Group Companies Data Protection Officers	16	13
Total detected number of customer data leaks, thefts or losses	0	0

### [GRI 418-1a, 418-b] BU Brasile

In the Brazil BU, in both 2023 and 2022, the Data Protection Officer (DPO) was not aware of any specific complaints relating to privacy violations and/or loss of data of its customers.

## PRIVACY AND CYBERSECURITY

### [GRI 418-1c]

In 2023, TIM continued to implement necessary actions to ensure the adoption, in internal processes, of provisions on personal data security breaches, as well as to respond to requests for information from the Data Protection Authority (following customer reports/complaints) and to numerous requests from customers to exercise their privacy rights (for example to know the personal data processed by TIM, to object to promotional calls, to request the rectification of inaccurate data or the deletion of data).

It should be noted that requests for information from the Data Protection Authority and from customers to exercise privacy rights are not related in any way to the indicator in question regarding

"Substantiated complaints regarding breaches of customer privacy". For clarification, the data relating to "Total number of customer data leaks, thefts or losses" refer to data breaches concerning the theft of company laptops, which are also protected by login credentials and other encryption security measures.

In 2023, the Brazil BU received more than 1,000 requests from its customers regarding the Holder Rights. In 2022, more than 600 requests were received.

Among the Privacy Rights requests received, the most frequent concerned, both in 2023 and 2022: (i) right of access; (ii) requests to erase data; and (iii) requests to stop advertising messages.

# MANAGEMENT OF MATERIAL TOPICS

## DIGITAL TRANSFORMATION AND INCLUSION

POSITIVE IMPACT - EFFECTIVE

### [3-3 a, b]

Telecommunications companies develop innovative infrastructures and digital solutions that simplify people's lives by promoting inclusion and transforming the way companies and public administrations operate.

#### POLICIES AND COMMITMENTS

### [3-3 c]

- Member of the European Large-Scale Partnership for digital skills which helps people and companies acquire the skills necessary to achieve the objectives of the digital and green transition of the European economy
- Commitment to support the European strategy on gender equality
- In Brazil, the investment plan until 2024 (agreement signed with Anatel Conduct Adjustment Term) aims to improve the quality of services and customer experience

#### KPIs

### [3-3 e]

- % FTTH coverage
- No. of training/dissemination initiatives
- No. of people involved

#### PLAN TARGETS

### [3-3 e]

- Italy FTTH 48% by 2025
- In Brazil, an increase in 5G coverage, an increase in sites per square kilometre

#### ACTIONS

### [3-3 d, e]

#### Domestic

- Employer Branding projects for the development of technical, professional and digital skills in order to overcome the digital divide
- Training course on Media Literacy «Appointment with Digital Media» to promote the potential of the digital world
- Women Plus App initiative to contribute to women's empowerment
- Participation in Career day, Job Fair, with a focus on young people and women to enhance inclusion and talent
- Event at the Santa Croce Monumental Complex, in collaboration with Qualcomm, for the presentation of an immersive museum visit itinerary
- Experimentation of the Robot4Inclusion solution for meal delivery service automation

#### Brazil

- 100% of municipalities covered by 4G
- More than 200 municipalities (27 capitals) covered by 5G
- 16 million hectares covered in the smart agriculture business (+2 million vs 2022)

#### PROGRESS VS TARGET

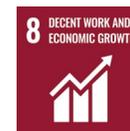
### [3-3 e]

#### Domestic

- FTTH coverage equal to 38% of the country's housing units
- +2% (vs 2022) participation in training initiatives

#### Brazil

- 100% of municipalities covered by 4G
- More than 200 municipalities (27 capitals) covered by 5G



## DIGITAL TRANSFORMATION AND INCLUSION

### CERTIFICATIONS AND PROCESSES

*From its daily activities, TIM acquires useful insights and is committed to continual improvement, in order to disseminate ultra-fast connectivity, accessible and secure digital services and strengthen digital skills. In particular, in 2023 the way in which initiatives are communicated have been modified in order to optimize the achievement of objectives.*

### COLLABORATIONS

#### [3-3 f]

- Constant collaboration with external and internal partners for the implementation of projects and achievement of objectives
- Collaboration with the Italian Digital Media Observatory
- Collaboration agreement with Qualcomm for the development of innovative services

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Trasformazione e inclusione digitale	Technological	High

#### Risk calculation methodology

Methodology: Game theory and Monte Carlo model.

- Variables: FTTX network coverage requirements, FTTX revenue activations trend, TIM-FiberCop-KKR partnership agreement constraints, Reference inflation context trend, Commodity price volatility, Gross Domestic Product (GDP) evolution, Customer Base, ARPU, perceived quality level (Customer Satisfaction Index), benchmark competitors.

#### Activities performed

- Integration with Network, Strategy and Financial Reporting processes activated in order to assess the risks of fiber roll-out delays, overspending on production factors and decommissioning of the transmission network, as well as to update the progress of mitigation actions (mainly process) over time.
- Econometric model applied for the economic valuation of risk.

# MANAGEMENT OF MATERIAL TOPICS

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

POSITIVE IMPACT - ACTUAL



### [3-3 a, b]

The level of customer expectations and satisfaction comes from the relationship that companies establish with their customers such as listening to needs, providing quality services, resolving disputes and transparency in business transactions, marketing activities and commercial transactions

#### POLICIES AND COMMITMENTS

### [3-3 c]

- Quality standards of service
- Commercial materials regulatory compliance
- Continuous improvement of the customer experience

#### KPIs

### [3-3 e]

- CSI (customer satisfaction index)
- No. of Corecom complaints
- No. of complaints and positive joint settlements

#### PLAN TARGETS

### [3-3 e]

- Improvement in all KPIs vs. the previous year
- In Brazil, the National Mobile Consumer Net Promoter Score rating higher than 50 by 2025

#### PROGRESS VS TARGET

### [3-3 e]

#### Domestic

- Consumer CSI substantially in line with 2022 and in line with targets for the Small & Medium Business segment
- 7,346 complaints down 30% vs. 2022 and conciliation with positive settlements in 96.5% of cases
- 23,814 cases at Co.Re.Com down 39% vs. 2022 with positive agreements reached in 81.7% of cases

#### Brazil

- Reduction of complaints received by PROCON thanks also to the migration to the ProConsumidor platform

#### ACTIONS

### [3-3 d, e]

#### Domestic

- Enhance customer listening activities at the various touch points
- Constant monitoring of the services offered to ensure quality and rapid actions for the resolution of problems
- Monitoring of the perceived quality of services using third parties
- Stronger communication for the landline fiber offer "up to 10 gigabytes"
- Adaptation of promotional material relating to commercial offers to meet regulatory obligations, specially in relation to Resolution 591/20 CONS
- Extension of the new complaint management model to all Consumer Associations in order to respond quickly and with a positive dispute resolution rate
- Streamlining of the structure of offers, e.g. TIM Cloud Flex which reorganizes and converges different Cloud services

- Solutions offered enabling customers to monitor consumption in advance of billing
- Supervision of customers during all stages of the customer journey and the provision of expertise and technologies for uniform business lines
- Technologies that are more energy-efficient and perform better in terms of the quality of services offered

#### Brazil

- Continuous expansion and improvement of the network to ensure the best quality of service
- Promotion of customer-centricity by focusing on digital transformation and fostering a multi-channel relationship
- Provision of a 24-hour multi-channel service
- Surveys to evaluate the customer experience such as the Net Promoter Score

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- ISO 9001
- ISO 22301
- ISO 20000
- ISO 27001
- UNI 11098:2003
- Periodic checks on sensitive processes (Law 262 and MO 231)
- System dedicated to the Business Continuity process (BC4TIM)

### COLLABORATIONS

#### [3-3 f]

- Constant dialogue with Consumer Associations
- Training courses with Consumer Associations focused on the knowledge of fiber, related services and relative benefits
- Event sponsored with the Consumer's Forum dedicated to the relationship between OTT and consumers

#### Brasile

- Annual evaluation of TIM services through surveys proposed by Anatel (Satisfaction and Perceived Quality of Telecommunication Services)
- TIM User Council, an initiative that aims to bring the company closer to its consumers and their trade associations

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Customer interaction and transparency of services	Market	High

#### Risk calculation methodology

#### Fixed/Mobile:

- Methodology Model based on Game Theory + Monte Carlo model.
- Variables: GDP Evolution, Customer Base, ARPU and the level of perceived quality (Customer Satisfaction Index), benchmark competitors.

#### Relevant Projects:

- Methodology based on Monte Carlo simulations.
- Variables: Perceived quality level, bid prices, project Capex/Opex, fees to project partners, minimum commitment, penalties, bid launch timing.

#### Activities performed

- Integration with Planning, Strategy and Marketing processes in order to analyse development drivers and identify key risk factors as well as to update the progress of mitigation actions (contractual, process, supply).
- Econometric model, supported by the Monte Carlo engine, for the economic valuation of risk.
- A transversal process of analysis of strategic investment projects and their follow-up integrated with business lines.

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### [GRI 416-1]

To verify that the products placed on the market comply with health and safety regulations, in Italy TIM has specific internal units that plan "type tests" for the initial evaluation of products according to company specifications, and incoming quality controls on products in the marketing phase, collected both in Italy and in the production centers of suppliers abroad. The Company also has laboratories that carry out tests on the products marketed by the Group, in particular on electrical safety and electromagnetic emissions. At TIM S.p.A., the percentage of significant product and service categories in relation to which the impacts on health and safety are assessed - with a view to improvement - is equal to 100%.

In 2023, at the request of TIM's Engineering departments, four devices for FWA<sup>(1)</sup>, FTTH<sup>(2)</sup> and FTTCab<sup>(3)</sup> networks intended to be installed at the customer premises were checked in the laboratories; in 2023, no equipment for incoming quality controls arrived at the laboratories.

For product liability, TIM checks:

- energy efficiency aspects<sup>(4)</sup>;
- the functionality of the devices in the different environmental conditions of installation and use, including any accessory components for connection to the fixed network<sup>(5)</sup>;
- electromagnetic compatibility aspects<sup>(6)</sup>.

<sup>(1)</sup> Fixed Wireless Access, that is, a set of transmission systems developed to use given frequencies of the radio spectrum in order to provide broadband internet connectivity services with nominal connection speeds of 1 Gbps (Gigabit per second)..

<sup>(2)</sup> Fiber To The Home, or the fiber optic starts from the exchange and arrives directly inside homes.

<sup>(3)</sup> Fiber To The Cabinet, or the fiber optic starts from the exchange and reaches the cabinet in the street closest to homes.

<sup>(4)</sup> Required by Directive 2009/125/EC (Energy-related-Products), as the devices placed on the market are verified with respect to the power consumption limits in Stand-by/Off-mode (pause/off) and performance, as set out in European Regulations 1275/2008/EC, 801/2013/EC and 2019/1782/EC, for devices and related external power supplies (present as accessory equipment).

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

To encourage sustainable development in its areas of influence, in addition to the statutory requirements for electrical safety, energy consumption and EMC<sup>(7)</sup> on marketed equipment, TIM also carries out checks on electrical robustness requirements (in compliance with the ITU- T recommendations series K and mechanical<sup>(8)</sup>, in order to contribute to the reduction of waste electrical and electronic equipment (WEEE) at source<sup>(9)</sup>. The addition of these robustness requirements, also within TIM equipment specifications, requires the manufacturer to use adequate protection mechanisms on the electrical interfaces of devices, such as overvoltage and overcurrent limiters, with a consequent reduction in the number of destructive failures; with these technical measures, it follows that the functionality of the devices is prolonged over time and, in cases of occasional damage, the same functionality can be easily recovered with the replacement of a few components/modules by

repair centers. Compared to the equipment intended for customer premises, which was tested in the laboratories during 2023 for mandatory CE marking requirements, 50% of the products refer to modems/routers and accessories for VDSL<sup>(10)</sup> and FTTH services, and 50% to FWA modems/routers.

All telecommunications infrastructure sold in Brazil must first be approved by Anatel. The body has the task of verifying, in its laboratories, compliance with the electrical and electromagnetic safety parameters established by Brazilian legislation.

<sup>(5)</sup> In fact, compliance with the temperature and humidity fields envisaged by the ETSI (European Telecommunications Standards Institute) standards for the specific "service condition" is monitored, from which different levels of "severity" derive. The controls are conducted based on the standards of the ETSI EN 300019 family, with the test methods envisaged by the IEC-EN series 60068-2-1 (cold), 60068-2-2 (dry heat), 60068-2-14 (temperature changes), 60068-2-30 (humidity changes), 60068-2-78 (continuous humidity).

<sup>(6)</sup> Regulated by the Directives 2014/30/EU (EMC) and 2014/53/EU (RED), as the control of emissions of unintentional electromagnetic signals is envisaged - to avoid harmful interference to radio communications - and certain requirements regarding immunity to electromagnetic disturbances must be met. At TIM, continuous checks are carried out on terminals and network equipment to check compliance with the requirements set by international standards regarding electromagnetic compatibility. In particular, the compliance of the equipment with the limits set by the regulations to limit emissions of electromagnetic disturbances which, in addition to polluting the surrounding environment, can interfere with radio communications, is verified.

<sup>(7)</sup> Electromagnetic Compatibility; regulates radio equipment to affix CE marking.

<sup>(8)</sup> In compliance with the installation classes foreseen by the European standard ETSI EN 300019.

<sup>(9)</sup> By placing on the market equipment with an adequate level of electrical and mechanical robustness, compared to the stresses expected in the field, the failure rate of the equipment is reduced and, therefore, the quantity of waste to be sent to adequate disposal centers.

<sup>(10)</sup> Very High Bit Rate Digital Subscriber Line is a xDSL cable communication technology that allows for higher speed performance than previous ADSL technology.

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### [GRI 416-2]

Incoming Quality checklists are used for the concurrent monitoring/ surveillance of "Requirements that impact the health and safety of products" as well as "Product information and labelling". Therefore, incidents of non-compliance with the regulations that lead to a

warning are the same in number for "Requirements that impact the health and safety of products" as "Product information and labelling".

### [GRI 416-2] TIM S.p.A.

Incidents of non-compliance concerning the health and safety impacts of products and services	2023	2022
Incidents of non-compliance resulting in a fine or sanction	0	0
Incidents of non-compliance with regulations resulting in a warning	3	3
Incidents of non-compliance with self-regulation codes	0	0

In Italy, in the last three years, no nonconformities regarding customer health and safety in European legislation were detected in any of the products reaching the final marketing stage.

The incoming Quality activity has been suspended since July 2023 with formal communication from the Procurement Director to all customer functions due to the lack of the necessary effort.

Based on the ServCo - NetCo separation, the competent functions are evaluating the possible placement of the business.

In Brazil, in 2023 there were no PADO (Default Assessment Procedures) with ANATEL, nor administrative proceedings with SENACON (National Consumer Secretariat) and CADE (Administrative Council for Economic Defense), both under the Authority's area of responsibility.

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### [GRI 417-1]

In 2023, TIM Spa requested all its suppliers of fixed telephony products to provide:

- an environmental declaration;
- the declaration of the origin of any tantalum used in components (REACH);
- the user manual;
- the document that includes safety information;
- information on the possible presence of dangerous materials and disposal methods.

In addition to the aforementioned documents, for all new landline supplies, TIM is still requesting the compilation of a further document called the "Sustainability Checklist", in which all information relating to sustainability must be reported, from production to product end-of-life, indicating the different types of materials and their disposal, including packaging materials. For technical assistance under warranty, TIM continues to use only refurbished modems; the possibility of selling these refurbished products to the public is still being evaluated.

As regards mobile telephony equipment, being consumer products that TIM simply resells and for which no type of customization is required, the Company requires suppliers to comply with national and European regulations.

The sale of refurbished smartphones, which started in the autumn of 2019, also continued in 2023, with refurbished iPhone models.

These products are exclusively Class A+ to ensure maximum quality for the end customer. To reduce environmental impact and following the example of the new models, accessories and packaging materials have also been reduced to a minimum in the packaging of refurbished smartphones; chargers and earphones are no longer included.

Since IVQ22, TIM launched the TIM VALUTA service, which allows end customers to hand in their old smartphone and obtain a discount on the purchase in instalments of a new smartphone.

For obsolete smartphone products, TIM has organized recycling activities for some years now with which take place through disposal based on online sales tenders. The products are put into lots and companies identified and authorized for this purpose can participate in the tenders. The products sold are subsequently dismantled, to recover all the components of interest for their "second life cycle".

Furthermore, to reduce the environmental impact of using plastic, TIM markets SIM cards that are half the size of normal ones and uses recycled plastic for the card holder. This saves around 14 tons of plastic per year.

Starting from November 2023, TIM plans to use fully dematerialized web eSIMs.

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### [GRI 417-1] TIM S.p.A.

Requirements for product and service information and labelling	2023	2022	2021
Number of batches tested between fixed and mobile terminals	19	246	237
Number of batches with negative testing results	0	3	3
Number of batches with negative testing results and sanctioned	0	0	5
Number of batches with negative testing results and for which a warning was issued	3	3	3

The percentage of significant products or categories of services processed or assessed for compliance with these procedures is equal to 100%.

The incoming Quality activity has been suspended since July 2023 with formal communication from the Procurement Director to all customer functions due to the lack of the necessary effort.

Based on the ServCo - NetCo separation, the competent functions are evaluating the possible placement of the business.

Even in Brazil, considering Anatel's provisions, this percentage is equal to 100%. In fact, following what the Agency determines, TIM requires its suppliers to guarantee that the devices have the approval or certification from the body. In this way, the Company ensures that packaging and manuals contain adequate instructions for the correct and safe assembly and use of products and connection sockets.

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### [GRI 417-2] TIM Spa

Requirements for product and service information and labelling	2023	2022
Incidents of non-compliance with self-regulation codes	0	0
Incidents of non-compliance with regulations resulting in a warning	3	3
Incidents of non-compliance resulting in a fine or sanction	0	0

Incoming Quality checklists are used for the concurrent monitoring/ surveillance of "Requirements that impact the health and safety of products" as well as "Product information and labelling". Therefore, incidents of non-compliance with the regulations that lead to a warning are the same in number for "Requirements that impact the health and safety of products" as "Product information and labelling".

In Italy, in the last three years, no nonconformities regarding customer health and safety in european legislation were detected in any of the products reaching the final marketing stage.

The incoming Quality activity has been suspended since July 2023 with formal communication from the Procurement Director to all customer functions due to the lack of the necessary effort.

Based on the ServCo - NetCo separation, the competent functions are evaluating the possible placement of the business.

In Brazil, in 2023 there were no PADO (Default Assessment Procedures) with ANATEL, nor administrative proceedings with SENACON (National Consumer Secretariat) or CADE (Administrative Council for Economic Defense), both under the Authority's area of responsibility.

## CUSTOMER INTERACTION AND TRANSPARENCY OF SERVICES

### [GRI 417-3] TIM Spa

Incidents of non-compliance concerning marketing communications	2023	2022	2021
Incidents of non-compliance with voluntary codes	0	0	2
Incidents of non-compliance resulting in a fine or sanction	0	0	0
Incidents of non-compliance with regulations resulting in a warning	0	0	0

Cases are regulated by the Advertising Self-Discipline Institute, which operates in compliance with the Commercial Communication Code and is responsible for settling all advertising disputes involving associated entities, directly or indirectly. The Jury's decisions never result in financial sanctions but, if necessary, to stop the contested advertising.

The two incidents of non-compliance in 2021 concerned:

- the Wind Tre S.p.A. proceeding against Telecom Italia S.p.A. (hearing of 27 July 2021). The telecommunications operators Wind Tre and Vodafone submitted a request to the Advertising Self-Discipline Jury against TIM's communication which advertised the TIM Serie A wifi. The Jury's decision did not accept the requests of the counterparties except for the phrase "wifi ready for Serie A" and expressions of similar meaning;
- the Wind Tre, Vodafone, Fastweb and Sky proceedings against Telecom Italia S.p.A. (hearing of 28 September 2021). The operators summoned presented a request to the Jury against TIM's advertising which mainly advertised the offer of TIM Serie A matches. The Jury accepted almost all the requests of the opposing parties.

In Brazil, CONAR is a non-governmental advertising self-regulatory organization, which evaluates non-compliance with the Brazilian Advertising Code of Conduct ("CBAP"). CONAR seeks to ensure that each advertisement is truthful, honest, in accordance with the laws of the Country and the principle of fair competition, and to ensure the adaptation/correction or suspension of advertising and marketing communications if transmitted without abiding by these principles. CONAR does not impose financial penalties.

TIM Brazil received three notifications from CONAR in 2023, in which TIM was reported by the body as an interested party. In these three cases TIM acted as a communication vehicle and did not communicate the brand itself; therefore, there were no incidents of non-compliance with marketing communications to report (like 2022).

# MANAGEMENT OF MATERIAL TOPICS

## CLIMATE CHANGE

### NEGATIVE IMPACT - ACTUAL

#### [3-3 a, b]

Climate change generated by an increase in CO2 emissions translates into rising temperatures and the occurrence of extreme weather events. In this context, the activities of companies in the telecommunications sector and their value chain can impact the global climate system due to the emission of greenhouse gases or gases with a high warming potential into the atmosphere.

TIM Group can contribute to the negative impacts either directly, through its own activities, or even indirectly through the impacts recorded along the entire value chain, in particular with reference to the supply chain. In addition, thanks to solutions characterizing its business, such as smart working, telemedicine platforms, sharing and e-learning platforms, and videoconferencing systems, TIM can promote the development of more sustainable lifestyles by ensuring the performance of activities and safeguarding the environment.

#### POLICIES AND COMMITMENTS

##### [3-3 c]

- Group Environmental Policy
- Processes and procedures in line with the main standards
- Reduction of direct and indirect emissions
- Selection of sustainable suppliers
- Efficient infrastructure management
- Focus on supply chain sustainability
- Policy Crisis Management
- In Brazil, Climate Change Management Policy

#### PLAN TARGETS

##### [3-3 e]

- Net Zero (Scope 1+2+3) by 2040
- Carbon Neutrality (Scope 1+2) by 2030
- - 47% Scope 3 emissions by 2030 (cat.1, 2 and 11 – vs. 2019- SBTi)

#### KPIs

##### [3-3 e]

- Scope 1, 2, 3 emissions
- GHG emissions intensity rate (carbon Intensity)
- Energy consumption monitoring (PUE)

#### PROGRESS VS TARGET

##### [3-3 e]

- Group**
- -8% vs. '22 Scope 1 emissions
  - - 32% vs. '22 Scope 2 emissions
  - 1.928.756 tCO2 eq. of scope 3<sup>(1)</sup> emissions (categories 1, 2 and 11)
- Domestic BU**
- GHG emissions intensity (carbon intensity) equal to 1,46<sup>(2)</sup> (-33% vs. 2022)
  - PUE Core Data Center 1,56<sup>(2)</sup>

(1) Significant effort was made in 2023 to improve the calculation methodology for Scope 3. The new calculation methodology was also extended to 2021 and 2022.

(2) Italy perimeter

#### ACTIONS

##### [3-3 d, e]

- Integration of climate change-related risks into the Group's risk matrix, so that they are monitored, prevented and mitigated in line with the TCFD recommendations: <https://www.gruppotim.it/en.html>
- Climate targets in line with the requirements of the Science Based Targets initiative;
- Adoption of environmental management systems certified to ISO 14001

#### Domestic

- Implementation of a Building Energy Management Systems mechanism
- Gradual modernisation of technological assets of industrial real estate and for specific Data Centres
- Experimentation of new technologies and solutions to promote energy savings
- Installation of 14 photovoltaic plants with a capacity of approximately 0.7 GWp starting from June '23
- Extraordinary maintenance of 101 small-scale plants with a capacity of approximately 0.9 GWp to improve efficiency
- Actions to make conditioning systems on power plants more efficient
- Increase in the use of renewable energy sources through Guarantees of Origin and Power Purchase Agreements as well as self-generation
- Constant monitoring of performance indicators (PUEs)
- Operational Crisis Team (OCT), responsible for the operational coordination of various types of emergencies

#### Brazil

- Initiatives for the self-production of energy
- The ESG Committee monitors emission reductions to pursue annual targets and carbon neutrality
- B2B services to incentivize remote communication and reduce emissions



## CLIMATE CHANGE

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- ISO 14064
- ISO 50001 extended to 12 Data Centres
- GHG Protocol
- SBTi
- CDP certifications, promoting transparent communication on emissions

*The Group adopts processes and procedures in line with the main standards and constantly aligns them based on recorded evidence.*

### COLLABORATIONS

#### [3-3 f]

- Transparent communication of own climate strategy
- Active member of :  
the European Green Digital Coalition; Ecorating; the GSMA Foundation; the European Telecommunications Network Operators' Association (ETNO); the European Telecommunications Standards Institute (ETSI); the Global e-Sustainability Initiative (GeSI); the International Telecommunication Union (ITU)
- Collaboration in institutional roundtables for the management of emergencies related to climate change
- Participation in the Carbon Disclosure Project and the CDP Supply Chain programme
- Member of the board of ConectarAgro, an association promoting connectivity in rural areas and fostering the agribusiness

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Climate change	Climate/Regulatory	Average
<b>Risk calculation methodology</b>		
<b>Climate-Physical Risks (Hidrogeological, Overspending Assurance Cost, Loss of Human Resources Productivity)</b>		
<ul style="list-style-type: none"> <li>• Methodology: statistical and arithmetic algorithms.</li> <li>• Variables: Statistics on the evolution of temperatures and productivity in Europe as a result of the evolution of temperatures, ISPRA (Higher Institute for Environmental Protection and Research) maps on the level of hydrogeological risk, value of reconstruction/replacement of assets, georeferencing of assets on the territory, frequency of significant damaging events, correlation between variability in the number of interventions related to rainfall and the failure rate, customer Base, Enterprise Labour (MOI), Unit Cost, Opex, Capex.</li> </ul>		
Please also refer to the TCFD, available on the Group's website <a href="http://www.gruppotim.it">www.gruppotim.it</a>		
<b>Climate Transition Risks (Carbon Tax on TIM CO<sub>2</sub>, Overspending, CO<sub>2</sub> reduction costs for suppliers reversed to TIM)</b>		
<ul style="list-style-type: none"> <li>• Methodology: statistical and arithmetic algorithms.</li> <li>• Variables: energy and fossil fuel consumption; renewable energy sources.</li> <li>• Measurement of CO<sub>2</sub> emissions.</li> </ul>		
<b>Activities performed</b>		
<ul style="list-style-type: none"> <li>• Integration with Network, Real Estate and Insurance processes in order to identify the risk factors essential for the valuation.</li> <li>• Environmental targets in line with and approved by SBTi.</li> </ul>		

## CLIMATE CHANGE

### [201-2 ai]

Climate change events can have physical, economic and regulatory implications, with financial repercussions on TIM's image and reputation. In order for the resulting risks to be monitored, prevented and mitigated, TIM builds its risk matrix, proposing alignment actions to anticipate and avoid negative effects. Managing these risks opens up opportunities for the Group to strengthen the resilience and efficiency of its assets and to start a process of energy transition. As a company in the TLC sector, the dematerialization services it has always offered can also become a real opportunity should the demand for them increase, also as a result of situations generated by climate change. Internally, TIM seizes this opportunity through the extended application of remote working. The compilation of the CDP and alignment with TCFD (Task Force on Climate-related Financial Disclosures) recommendations serve as a guideline for the Group. The launch of the ESG Plan has been a significant step forward, establishing environmental goals and commitments, with a focus on renewable energy and carbon neutrality. This plan reflects the Company's commitment to integrating ESG aspects into its corporate culture and strategic decisions.

The Group identifies and assesses the following risks related to Climate Change:

- Physical risks related to rising temperatures causing extreme and unexpected atmospheric precipitation, landslides, floods or overflows.

In particular: hydrogeological risk or damage caused to real estate and network assets; assurance cost overspending; also a reduced production capacity due to temperature stress.

- Transition risks i.e. the potential introduction of a carbon tax applied to CO<sub>2</sub> emissions and the occurrence of energy

overspending i.e. increased energy expenditure for the purchase or production of renewable energy to contain emissions.

In this multifaceted risk environment, the Group may need to manage capex and opex overspending to ensure business continuity, expected customer quality and compliance with Strategic Plan targets, through the following targeted actions:

- optimization of equipment placement within buildings
- insurance cover for catastrophic natural events
- structural interventions aimed at containing the effects of flooding
- analysis of hydrogeological risk maps for network planning and development
- prioritization of the decommissioning of energy-consuming equipment and technologies according to risk level
- agreements with network providers to regulate service restoration interventions in the event of extreme climatic events.

TIM also adopts comprehensive methods to ensure environmental compliance, incorporating laws and standards into its Environmental Management System, monitoring and managing compliance in critical locations such as radio base stations and data centers according to international standards such as ISO 14001. In Brazil, there is a constant commitment to protecting biodiversity through mitigation practices and respect for protected areas.

TIM Brasil is also developing the mapping and monitoring of natural disasters in the areas where its assets are located: the implications of this risk are estimated at around 15 million Reais. Joining projects in synergy with TLC operators and constant investment in renewable energy is already guaranteeing an economic return on investments.

## CLIMATE CHANGE

### [305-1]

The Group's Scope 1 greenhouse gas emissions consist of carbon dioxide generated by fossil fuels for heating, haulage and power generation. Leaks of hydrochlorofluorocarbon (HCFC) and hydrofluorocarbon (HFC) gases and other gases when present in air-

conditioning and fire-fighting systems are also taken into account and included in the calculation converted to CO<sub>2</sub>. The emissions reported here refer to the year 2023 and to the Domestic and Brazil BUs as identified in the environmental perimeter.

## CLIMATE CHANGE

### [GRI 305-1] Group and BU in detail

Direct (Scope 1) GHG emissions	u.m.	2023					2022	2021
		Group	BU Domestic	BU Brazil	BU Domestic	BU Brazil	Group	Group
Emissions from trigeneration	kgCO2 eq	47,734,595	47,734,595	0	100%	0%	57,921,819	77,174,832
Emissions from transport	kgCO2 eq	31,124,190	30,885,183	239,007	99%	1%	33,045,972	31,017,337
Emissions from heating	kgCO2 eq	9,081,023	9,081,023	0	100%	0%	7,944,985	8,521,733
Emissions from electricity self-production by mixed sources*	kgCO2 eq	3,369,743	839,580	2,530,163	25%	75%	3,577,678	1,408,143
Emissions from ozone depleting gases	kgCO2 eq	13,060,637	3,913,772	9,146,865	30%	70%	10,498,868	9,688,453
Emission from effluents	kgCO2 eq	1,922	0	1,922	0%	100%	0	0
Emissions from machines used for maintenance and cleaning the power plants areas	kgCO2 eq	25,327	0	25,327	0%	100%	0	0
Emissions from biogas	kgCO2 eq	15,597	0	15,597	0%	100%	0	0
Fugitive emissions	kgCO2 eq	4,658	0	4,658	0%	100%	0	0
<b>Total direct emissions Scope 1 GHG</b>	<b>kgCO2 eq</b>	<b>104,417,692</b>	<b>92,454,153</b>	<b>11,963,539</b>	<b>89%</b>	<b>11%</b>	<b>112,989,321</b>	<b>127,810,498</b>
2023/2022		-8%						
2023/2021		-18%						

\*Emissions from self-production of electricity from mixed sources in the table include both emissions from diesel for generator sets and emissions from natural gas for self-production of energy.

### [GRI 305-1] BU Brasile

Other direct emissions	u.m.	2023	2022
Biogenic emissions	kgCO2 eq	<b>34,405,946</b>	54,131,989

The emission factors used in 2023 are CO2 equivalent factors published by BEIS (formerly Defra). The evaluation of CO2 equivalent emissions of HCFCs, HFCs and other refrigerant gases is done by referring to their respective Global Warming Potential (GWP): the index is based on a relative scale that compares the gas considered with an equal mass of carbon dioxide whose GWP is 1. For the DOMESTIC BU, the IPCC Sixth Assessment Report was used in the calculation; the Brazil BU refers instead to the IPCC Fifth Assessment Report (AR5 - 100 years). The method of the Brazilian GHG Protocol uses the global warming potentials (GWP) of the 100-year time horizon in relation to CO2. Although the AR5 values are the most recent, the method also considers values from the second assessment report (1995) and the fourth assessment report (2007) for inventory purposes.

Emissions from self-generated electricity from mixed sources in the table include both emissions from diesel for generator sets and emissions from natural gas for the self-generation of energy. From 2023, Brazil BU emissions from effluents, from the consumption of fuels used for the maintenance of electricity generation plants and fugitive emissions of CO2 from fire extinguisher refilling has been detailed. Lastly, Brazil BU biogenic emissions are disclosed apart from Scope 1.

## CLIMATE CHANGE

### [305-2]

Scope 2 Market Based and Location Based emissions expressed in kg of CO2 equivalent are represented.

### [GRI 305-2] Group and BU in detail

Energy indirect (Scope 2) GHG emissions	u.m.	2023			2022	2021
		Group	BU Domestic	BU Brazil	Group	Group
<b>Market Based</b>	<b>kgCO2 eq</b>	<b>232,269,196</b>	100%	0%	341,806,828	405,235,181
2023/2022		-32%				
2023/2021		-43%				
<b>Location Based</b>	<b>kgCO2 eq</b>	<b>408,430,773</b>	97%	3%	399,188,397	442,596,650
2023/2022		2%				
2023/2021		-8%				

The sources of the greenhouse gas emission factors used are those of the AIB 2022 report for Italy and Greece and the 2022 Location Based Terna coefficients for Turkey in the absence of the Market Based factor; for the Brazil BU, for the Location Based approach, emissions are calculated using the average emission factor available of the National Interconnected System (SIN) from the Brazilian Government. For the Market Based approach, renewable energy certificates (I-RECs) are considered. Scope 2 Location Based emissions are calculated for companies consolidating in the Domestic BU scope using Indicators of efficiency and decarbonisation of the national energy system and the electricity sector - ISPRA Report 386/2023 for Italy and the 2022 Terna coefficients for Greece and Turkey.

## CLIMATE CHANGE

### [305-3]

In 2023, the TIM Group made a significant effort to improve the methodology used for the «Scope 3» categories. Specifically, Scope 3 includes measurement and certification of three emission categories out of the 15 identified by the «GHG Protocol»: category 1 – Purchased Goods and Services; category 2 – Capital Goods; category 11 – Use of Sold Products.

With reference to the calculation methodology adopted in 2023, a spend-based method was used for categories 1 and 2. In fact, for each product category purchased, Eurostat NACE emission factors were considered, replacing those offered by the «Quantis» tool,

provided by the GHG Protocol, used in 2021 and 2022. For category 11, based on the sellout data for each business family, the relevant emission factor and energy consumption parameters were identified on the basis of the following sources: LCA Analyses/Environmental Declarations/Technical Data Sheets published by the manufacturers and Ecoinvent Database.

Given the change in calculation methodology and, therefore, the non-comparability of data over the three-year period under analysis, the percentage deviations from 2023 Scope 3 GHG emissions are not shown in the table below.

### [GRI 305-3] Group

Indirect GHG emissions (Scope 3)	u.m.	2023	2022	2021
Indirect GHG emissions (Scope 3) - Category 1	tCO <sub>2</sub> eq	1,304,139	862,780	912,842
2022/2021			-5%	
Indirect GHG emissions (Scope 3) - Category 2	tCO <sub>2</sub> eq	548,330	3,338,948	3,914,964
2022/2021			-15%	
Indirect GHG emissions (Scope 3) - Category 11	tCO <sub>2</sub> eq	76,287	404,795	442,227
2022/2021			-8%	
<b>Total Indirect Emissions (Scope 3)</b>	tCO <sub>2</sub> eq	<b>1,928,756</b>	<b>4,606,523</b>	<b>5,270,033</b>
2022/2021			-13%	

*With the aim of ensuring consistency in the results of the last three years, the calculation methodology was also applied for the years 2021 and 2022. In fact, adopting the new calculation criteria, GHG Scope 3 emissions in 2021 are equal to 1,796,793 tCO<sub>2</sub>e, in 2022 they are equal to 1,792,261 tCO<sub>2</sub>e (in 2021 and 2022 cat. 11 was calculated only for Italy).*

## CLIMATE CHANGE

### [305-4]

TIM has carbon-intensity indicators, which differ by geographical area due to the different composition of emissions in Italy and Brazil. For companies in the Italy perimeter, the indicator relates direct and indirect CO<sub>2</sub>eq emissions (Scope 1 and Scope 2 Market Based, measured in kg and generated through their own activities) to the service offered to customers (Tbit transmitted). Data and voice traffic from the fixed/mobile network and direct emissions generated by

the consumption of fossil fuels for heating, fuel for transport and the self-generation of electricity are taken into account, together with indirect emissions related to the purchase of electricity produced by third parties. For the Brazil BU, Scope 1 and Scope 2 emissions Location Based are taken into account, which include the gases CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, HCFC and HFO.

### [GRI 305-4] Italy

GHG emissions intensity	u.m.	2023	2022	2021
	kgCO <sub>2</sub> eq/Terabit	1.46	2.17	2.92

### [GRI 305-4] Brazil

GHG emissions intensity	u.m.	2023	2022	2021
	kgCO <sub>2</sub> eq/Terabit	0.37	0.41	1.23

### [305-5]

The data shown here refer to the Group and express the variation in CO<sub>2</sub> equivalent emissions in the year 2023 compared to the emissions reported in 2022. The calculation is based on accounting for emissions according to the GHG Protocol approach making a distinction between direct emissions or Scope 1, indirect

emissions or Scope 2. For other indirect emissions (Scope 3), given the different calculation methodology and, therefore, the non-comparability of data over the three-year period under analysis, percentage changes from 2023 have not been shown in the table.

### [GRI 305-5] Group

Reduction of GHG emissions	u.m.	2023 vs 2022	2023 vs 2021	% 2023 vs 2022	% 2023 vs 2021
Scope 1	tCO <sub>2</sub> eq	-8,572	-23,393	-8%	-18%
Scope 2	tCO <sub>2</sub> eq	-109,538	-172,966	-32%	-43%

# MANAGEMENT OF MATERIAL TOPICS

## USE OF RENEWABLE ENERGY SOURCES

POSITIVE IMPACT - ACTUAL

### [3-3 a, b]

With regard to the production and purchase of energy, to power production processes and to run buildings, the use of alternative renewable energy sources instead of fossil fuels reduces the environmental impact in terms of greenhouse gas emissions. Every ICT company can make a concrete contribution to reducing greenhouse gas emissions by efficiently managing its core business activities (network and data centre management).

#### POLICIES AND COMMITMENTS

### [3-3 c]

- Group Environmental Policy optimising the use of energy sources
- Progressive supply of energy from renewable sources and development of self-generation from photovoltaic plants
- Variable remuneration for management linked to the % of renewable energy used

#### PLAN TARGETS

### [3-3 e]

- 100% renewable energy by 2025 (Italy and Brazil)
- Increase vs. previous year of % of renewable energy purchased
- In Brazil, increase in the eco-efficiency indicator in data traffic by 110% by 2025

#### KPIs

### [3-3 e]

- Energy consumed
- % of energy purchased from renewable sources
- Eco-efficiency indicator

#### PROGRESS VS TARGET

### [3-3 e]

#### Group<sup>(1)</sup>

- + 24% ca (vs. 2022) of purchased energy from renewable sources<sup>(2)</sup>
- + 13% ca (vs. 2022) of purchased energy from renewable sources out of total purchased energy
- 72% of purchased electricity from renewable sources out of total purchased electricity.

#### Domestic

- + 13% (vs 2022) of eco-efficiency<sup>(3)</sup>

#### Brazil

- 100% renewable energy with the purchase of energy from the free market and guarantee of origin certificates

(1) The following TIM Group companies were included in the '23 environmental scope: TIM S.p.A., Sparkle Group (companies that meet the criteria as set out in the methodological note), Fibercop S.p.A, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telenergia S.r.l., Telsy S.p.A., TIM Retail S.r.l., as well as the Brazil BU

(2) Also via GO, PPA purchases in Italy and RES purchases in Brazil

(3) Italy perimeter

#### ACTIONS

### [3-3 d, e]

#### Domestic

- Increase use of energy from renewable sources in business processes, through the purchase of energy from Guarantees of Origin, the development of on-site photovoltaic plants and Power Purchase Agreements (TIM and ERG agreement for the supply of energy from wind farms amended to increase the amount of green energy purchased)
- Monitoring the % of green energy from Guarantees of Origin out of total purchased energy
- Plan to install 14 photovoltaic systems with operation starting in June 2023

#### Brazil

- Distributed Generation project to support the self-generation of energy, secure energy from renewable sources; at the end of '23 TIM had 101 small power plants, mainly solar installations
- Launch of the 'Energy Club' initiative: for employees, allowing them to save on energy consumption from renewable sources



## USE OF RENEWABLE ENERGY SOURCES

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- ISO 50001

*The Group incorporates insights, which emerge in the course of its activities, into corporate processes and policies to improve its consumption targets.*

### COLLABORATIONS

#### [3-3 f]

- Active member of sector and non-profit associations
- In Brazil, the Sky Coverage project in partnership with Highline and with IHS and Winity, enables the connectivity of antennas powered by self-generated solar energy with photovoltaic panels, connected via satellite.
- Collaboration and discussions with government agencies, regulators, suppliers and financial institutions

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Use of renewable energy sources	Climate	Average
Risk calculation methodology		

(see Climate Change and TCFD report available on the TIM Group website [www.gruppotim.it](http://www.gruppotim.it))

### Activities performed

- Increase in the use of energy from renewable sources in business processes, through the purchase of certified renewable energy, the development of on-site photovoltaic plants and Power Purchase Agreements and distributed energy projects.
- Monitoring of the % green energy out of the total energy consumed.

## USE OF RENEWABLE ENERGY SOURCES

### [302-1]

The Group's energy consumption is broken down into consumption of electricity purchased and produced from renewable sources, purchase of electricity from mixed sources, consumption

from heating fuels, consumption from fuels for transport, and consumption for self-generation of electricity. No share of electricity, heating energy, cooling energy, or steam is sold.

### [GRI 302-1] Group and BU in detail

Energy consumed within the organization		2023				2022		2021
Energy from Mixed Sources	u.m.	Group	BU Domestic	BU Brazil	BU Domestic	BU Brazil	Group	Group
Energy from unleaded petrol	MJ	65,132,460	60,635,690	4,496,770	93%	7%	42,087,104	31,655,676
Energy from diesel fuel	MJ	383,281,967	383,233,550	48,417	100%	0%	426,265,874	413,231,373
Energy from natural gas fuel	MJ	0	0	0			12,248	0
Energy from LPG	MJ	0	0	0			2,025	12,778
<b>Total mixed sources energy from transport</b>	<b>MJ</b>	<b>448,414,427</b>	443,869,240	4,545,187	99%	1%	468,367,251	444,899,827
	2023/2022	-4%						
	2023/2021	1%						
Energy from heating oil	MJ	2,249,069	2,249,069	0	100%	0%	1,616,735	1,551,680
Energy from heating natural gas	MJ	158,407,667	158,407,667	0	100%	0%	139,389,993	149,172,887
<b>Total energy from heating</b>	<b>MJ</b>	<b>160,656,737</b>	160,656,737	0	100%	0%	141,006,728	150,724,567
	2023/2022	14%						
	2023/2021	7%						
<b>Energy from self-production of electricity from natural gas</b>	<b>MJ</b>	<b>27,293,356</b>	0	27,293,356	0%	100%	19,038,011	0
<b>Energy for diesel fuel for generators</b>	<b>MJ</b>	<b>26,983,053</b>	11,893,913	15,089,140	44%	56%	34,634,165	20,144,204
	2023/2022	-22%						
	2023/2021	34%						

## USE OF RENEWABLE ENERGY SOURCES

Energy consumed within the organization		2023				2022	2021	
<b>Energy from Mixed Sources</b>	<b>u.m.</b>	<b>Group</b>	<b>BU Domestic</b>	<b>BU Brazil</b>	<b>BU Domestic</b>	<b>BU Brazil</b>	<b>Group</b>	<b>Group</b>
<b>Energy from natural gas for trigeneration systems</b>	<b>MJ</b>	<b>847,489,689</b>	847,489,689	0	100%	0%	1,031,142,229	1,368,361,863
	2023/2022	-18%						
	2023/2021	-38%						
<b>Energy from purchase of electricity from mixed sources</b>	<b>MJ</b>	<b>1,832,725,408</b>	1,832,725,408	0	100%	0%	2,700,114,851	3,184,671,650
	2023/2022	-32%						
	2023/2021	-42%						
<b>Energy from machines used for maintenance and cleaning the power plants areas</b>		<b>497,366</b>	0	497,366	0	100%		
<b>Total energy from mixed sources</b>	<b>MJ</b>	<b>3,344,060,036</b>	3,296,634,987	47,425,049	99%	1%	4,394,303,235	5,168,802,111
	2023/2022	-24%						
	2023/2021	-35%						
<b>Energy from Renewable Sources</b>	<b>u.m.</b>	<b>Group</b>	<b>BU Domestic</b>	<b>BU Brazil</b>	<b>BU Domestic</b>	<b>BU Brazil</b>	<b>Group</b>	<b>Group</b>
<b>Energy from ethanol fuel for transport</b>	<b>MJ</b>	<b>1,407,184</b>	0	1,407,184	0%	100%	739,636	0
<b>Energy from self-production of electricity from renewable sources</b>	<b>MJ</b>	<b>996,718,500</b>	1,362,949	995,355,551	0%	100%	976,144,298	885,365,449
	2023/2022	2%						
	2023/2021	13%						
<b>Energy from purchase of electricity from renewable sources</b>	<b>MJ</b>	<b>4,713,082,441</b>	3,415,382,327	1,297,700,114	72%	28%	3,814,585,441	3,298,629,370
	2023/2022	24%						
	2023/2021	43%						
<b>Energy from self-production of electricity from biogas</b>	<b>MJ</b>	<b>286,184,100</b>	0	286,184,100	0%	100%	429,997,300	
<b>Total energy from renewable sources</b>	<b>MJ</b>	<b>5,997,392,225</b>	3,416,745,276	2,580,646,949	57%	43%	5,221,466,675	4,183,994,819
	2023/2022	15%						
	2023/2021	43%						
<b>TOTAL ENERGY CONSUMED</b>	<b>MJ</b>	<b>9,341,452,261</b>	6,713,380,263	2,628,071,998	72%	28%	9,615,769,909	9,352,796,929
	2023/2022	-3%						
	2023/2021	0%						

It should be noted that, starting from 2022, in relation to the energy consumed within the organization, the consumption of natural gas and biogas used for the self-production of electricity in Brazil has been reported at a consolidated level, in order to guarantee greater compliance with the requirements of GRI 302-1 disclosure. From 2023, in Brazil, these consumptions have been disclosed as fuel. Brazil also reports the energy produced from fuels (petrol) for the maintenance of self-produced electricity plants. Brazil's ethanol for transport has been classified as a renewable source. The numbers published in 2022 are also adjusted accordingly.

## USE OF RENEWABLE ENERGY SOURCES

### [302-3]

The Group measures its energy efficiency through the eco-efficiency indicator that relates the service provided to customers (bits transmitted) to the impact on the environment (joules of energy consumed). Data and voice traffic values from fixed and mobile networks are taken into account, as well as industrial energy consumption (for transmission and power plants air conditioning use), civilian energy consumption (electricity for office use, air conditioning and heating of offices), automotive consumption.

The Group calculates different indicators for Italy and Brazil as the two realities are very different from an operational and environmental point of view: in Brazil no heating fuels are used given the particular climatic conditions and there are no of trigeneration plants. The indicator takes into consideration only consumption within the organisation. The Italian perimeter includes only companies with headquarters and assets in Italy.

### [GRI 302-3] Italy

Energy Intensity	u.m.	2023	2022	2021
	bit/J	32,883	29,071	25,768

### [GRI 302-3] Brazil

Energy Intensity	u.m.	2023	2022	2021
	bit/J	25,523	19,991	19,271

*The energy intensity of TIM Brazil in 2022 differs from that reported in the Brazilian ESG Report due to the different classification of energy consumption, aligned from 2023*

# MANAGEMENT OF MATERIAL TOPICS

## EQUAL PAY AND OPPORTUNITIES AT TIM

POSITIVE IMPACT - POTENTIAL

### [3-3 a, b]

TIM – through remuneration and development, recruitment, retention and engagement policies – can have an impact on equal pay and professional growth opportunities for employees, as well as on equal treatment regardless of gender, ethnic origin, age or other personal characteristics.

### POLICIES AND COMMITMENTS

#### [3-3 c]

- Code of Ethics, Charter of Values and Human Resources and Equal Opportunities Policy for an inclusive work environment
- Recruitment and selection policy
- Remuneration policies to ensure competitiveness and fairness, also covering gender
- TIM Manifesto for reducing the gender gap
- Equal Opportunities Steering Committee
- For Brazil, Diversity & Inclusion Policy, Policy against moral and sexual harassment and bullying, and Diversity Committee

### PLAN TARGETS

#### [3-3 e]

##### Group

- Increase in the % of women in leadership positions out of the total (>=29% in '25)

##### Domestic

- Increase in the % of female managers out of total managers in Domestic Core<sup>(1)</sup> (LTI '21-'23)
- Decrease in the Gender Pay Gap in the Domestic Core<sup>(1)</sup> Middle Managers segment (MBO '23)
- Youth engagement (MBO '23)

##### Brazil

- women occupying leadership positions >=35% by 2025
- 40% black people in the work force by 2023 (ESG Plan 23-25)

### KPIs

#### [3-3 e]

- No. of employees and composition – % of women
- % of women in leadership positions
- % of women on Corporate Bodies
- % of women "Top Managers" out of the total number of "Top Managers"
- % of female middle managers out of total middle managers
- Gender pay gap
- Youth engagement

### PROGRESS VS TARGET

#### [3-3 e]

##### Group

- 30% women in leadership positions
- Top 20 Diversity Brand Index; best digital company with "TIMVISION parla LIS"

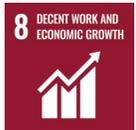
##### Domestic

- % of women of female managers out of total managers in line with targets<sup>(1)</sup>
- Gender pay gap<sup>(1)</sup> in line with targets
- Youth engagement equal to 77%

##### Brazil

- 36% of women in leadership position
- First Brazilian TLC operator to win GSMA's Diversity in Tech International Award

<sup>(1)</sup> Perimeter considered in incentive systems. Includes: TIM, FiberCap, Noovle, Telsy, TCC, TIS, TITT and Olivetti. Data of personnel in force or seconded - net Top and Local personnel recorded for TIM and Domestic Companies present in SAP as of 12/31/23



## EQUAL PAY AND OPPORTUNITIES AT TIM

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- UNI ISO 30415 :2021
- UNI PDR 125:2022
- TIM is certified as a Dyslexia Friendly Company
- Different assessment processes of external agencies on Diversity, Inclusion and Gender Equality

*In 2023 it was considered necessary to adopt more effective internal and external communication methods on issues related to the empowerment of young people and women.*

### COLLABORATIONS

#### [3-3 f]

- TIM is a founding partner of “Valore D”, an association of companies for the promotion of female employment and leadership
- “NoiD” Association founded by TIM women to enhance female talent
- Participation in STEM Girls and WomenHack recruitment events and support for scholarships
- In Brazil, Partnership with the Positive Women project

### ACTIONS

#### [3-3 d, e]

##### Domestic

- Engagement, incentive and development plans for identified targets (young people and women)
- Women Empowerment path for tapping into the potential of women's contribution and the development of a training course on inclusive leadership
- Under 37 engagement plan: meetings with top managers, the Young TIM community, “Vieni con me” storytelling format
- Parental leave in addition to paternity leave
- Projects to enhance the contribution of women in STEM
- Short and medium-long term incentive objectives (MBO and LTI) linked to the gender pay gap and the percentage of women in positions of responsibility
- Integrated communication plans “Young Engagement Program” and #LaParitàNonPuòaspettare
- Adaptation of processes, policies and procedures

##### Brazil

- Diversity & Inclusion programme to encourage equal opportunities, including through the Diversity Committee
- Launch of the Gender Manifesto
- Partnership with Todas Group platform for the development of female leadership
- Black Pearls Program: empower and accelerate the careers of black professionals with the potential to assume future leadership positions in the Company
- TIM 50+ Program to offer opportunities at TIM stores to the over 50s
- Constant communication and awareness-building campaigns

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [GRI 201-3a,b.i,b.ii, d,e]

For the Domestic BU, TIM Group has:

National Supplementary Pension Fund for employees of Telecommunications Companies - "Telemaco", a negotiated pension fund with defined contributions of the segment of companies operating telecommunications services (Article 52 of the National Collective Bargaining Agreement (CCNL).

Telemaco, established in 1998 as a recognized non-profit association, has been operational since October 2000. The purpose of this pension fund is to enable members to have access to supplementary pension benefits in addition to the compulsory system upon retirement. To this end, it collects contributions, manages resources in the exclusive interest of members and provides benefits in accordance with the provisions of law on supplementary pensions in force. Telemaco is for blue collars, white collars and middle managers, hired on a permanent basis or with an apprenticeship contract pursuant to Article 20 of the CCNL; Telemaco may also be joined by persons who are tax dependents of Fund members and beneficiaries.

The contribution to the Fund to be paid by the company is 1.4%. This contribution is granted to workers that are members of Telemaco who, in addition to severance pay, decide to contribute to the Pension Fund with a minimum contribution of 1% of the salary considered as the basis for determining the severance pay. As of 1 January 2024, 27,016 employees in service – belonging to companies of the TIM

Group – were registered with Telemaco.

For more information, please visit the website <https://www.fondotelemaco.it/>

Fontedir is the Supplementary Pension Fund for Group executives who, on a voluntary basis, decide to join by establishing an individual position with contributions paid by the Company and the Fund's members. Through agreements with insurance companies, the Fund pays out supplementary pensions in addition to the compulsory system, and directly disburses social security benefits that have accrued (severance pay, surrenders, advances, transfers, etc.) in accordance with legal requirements. The Fund operates as a defined benefits plan: The amount of pension benefits is determined on the basis of the contribution made, according to the principle of capitalization. It follows that the obligations set out in the plan are, by mathematical calculation, covered by the resources managed.

Income on individual positions, for Fontedir, is provided by separate management, which is governed by a special agreement with insurance companies; the obligations of the pension plan are 100% covered by the provisions set aside. For Fontedir, the obligations set out in the plan are, by mathematical calculation, covered by the resources managed. As of 31.12.2023, there were 1,167 executives registered with the Fund, of which 452 were employed by the TIM Group. More information can be found at <https://fontedir.it/>

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [GRI 201-3a,b,i,b.ii,c,d,e]

In the Brazil BU, the status of each pension plan is indicated in a special report; in summary:

- i. The Company's obligation with closed-end supplementary pension plans is 5.02 million reais.
- ii. The bases for the estimation are described in the report

(population, underlying assumptions, etc.).

lii. The estimate was made on 31.12.2023.

Closed-end supplementary pension plans (taken over from acquisitions of other companies) are currently in the black. However, should it be necessary to balance one of these plans due to a possible deficit, TIM S.A. will assume this obligation. It is important to note that the value of all liabilities is 5.02 million reais. Finally, it should be noted that the pension plan offered by TIM S.A. has a more modern structure, with a defined contribution, which in itself mitigates the need for future contributions based on actuarial risk.

The percentage of salary contributed by the employee or employer is 5%, with the possibility of increasing it up to 15% for managerial positions. Currently, the plan offered by TIM S.A. is voluntary and universal (offered to all employees).

Participation is 48%.

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [GRI 401-1a]

Group	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees hired	n	1,554	1,230	2,784	1,965	1,594	3,559	2,019	1,533	3,552
Terminated employees	n	3,277	2,535	5,812	3,022	2,097	5,119	2,602	1,618	4,220

Group	u.m.	2023		2022		2021	
		Men	Women	Men	Women	Men	Women
Employees hired <30	n	586	470	797	567	893	629
Employees hired <30-50	n	840	712	1,093	975	1,004	859
Employees hired <50	n	128	48	75	52	122	45
Employees hired	n	1,554	1,230	1,965	1,594	2,019	1,533
Terminated employees < 30	n	426	352	582	462	522	430
Terminated employees 30-50	n	950	905	1,061	1,039	850	735
Terminated employees > 50	n	1,901	1,278	1,379	596	1,230	453
Terminated employees	n	3,277	2,535	3,022	2,097	2,602	1,618

## EQUAL PAY AND OPPORTUNITIES AT TIM

Group	u.m.	2023		2022		2021	
		Men	Women	Men	Women	Men	Women
Employees hired - Italy	n	610	295	819	436	935	464
Employees hired - Abroad	n	944	935	1,146	1,158	1,084	1,069
Employees hired	n	1,554	1,230	1,965	1,594	2,019	1,533
Terminated employees - Italy	n	2,274	1,529	1,883	992	1,408	575
Terminated employees -Abroad	n	1,003	1,006	1,139	1,105	1,194	1,043
Terminated employees	n	3,277	2,535	3,022	2,097	2,602	1,618

### [GRI 401-1b]

Group	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Positive turnover rate	%	5	7	6	6	8	7	4	3	7
Negative turnover rate	%	11	14	12	9	11	10	5	3	8

Group	u.m.	2023				2022				2021			
		<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
Positive turnover rate	%	41	8	1	6	49	10	0	7	3	4	0	7
Negative turnover rate	%	30	9	12	12	38	10	7	10	2	3	3	8

Group	u.m.	2023			2022			2021		
		Italy	Abroad	Total	Italy	Abroad	Total	Italy	Abroad	Total
Positive turnover rate	%	2	20	6	3	24	7	3	23	7
Negative turnover rate	%	10	21	12	7	24	10	5	23	8

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [401-2a]

All full-time or part-time, permanent or fixed-term Group workers receive the same benefits. In Italy, the supplementary pension scheme is extended to workers with apprenticeship and integration contracts, as well as to permanent workers. In Brazil, any differences in the provision of benefits are not related to the different types of contract.

### [401-2b]

See GRI 2-6 for the definition of a significant place of business.

### [GRI 401-3]

Group <sup>(1)</sup>	u.m.	2023		2022		2021	
		Men	Women	Men	Women	Men	Women
Total number of employees who took parental leave	n	449	443	482	456	414	541
Total number of employees who returned to work during the reporting period, after taking parental leave	n	*	*	444	363	476	379
Total number of employees who returned to work after taking parental leave and who are still employed by the organization in the 12 months following their return	n	*	*	448	269	378	337
Rate of return to work in the Company of employees who have taken parental leave	%	*	*	98	83	99	83
Retention rate in the Company of employees who have taken parental leave	%	*	*	92	80	93	81

<sup>(1)</sup> Total number of employees entitled to parental leave: As required by specific Italian and Brazilian laws, the Group's employees all have the same right to take parental leave. Therefore, for the number of people who can potentially take parental leave, reference should be made to the entire workforce of the Group as at 31 December of each year. In addition, only compulsory maternity and paternity leave were taken into account when determining the number of people who took parental leave. On the other hand, optional parental leave is not considered because it is non-consecutive and variable over the course of the employee's child's 12 years.

\* The data will be available at the end of 2024.

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [GRI 405-1a] Group

Governing body members	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Under 30 years old	n	0	0	0	0	0	0	0	0	0
30 to 50 years old	n	15	4	19	16	11	27	15	10	25
Over 50 years old	n	22	8	30	42	10	52	40	5	45
Total	n	37	12	49	58	21	79	55	15	70

Percentage of members of the organisation's governing bodies by gender and age group	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Participants in management committees under 30 years old	%	0	0	0	0	0	0	0	0	0
Participants in management committees 30 to 50 years old	%	31	8	39	20	14	34	21	14	36
Participants in management committees over 50 years old	%	45	16	61	53	13	66	57	7	64

### [GRI 405-1b] Group

Number of employees by category and gender	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Managers	n	385	113	498	441	111	552	482	118	600
Middle Managers	n	3,059	1,387	4,446	3,210	1,457	4,667	3,209	1,419	4,628
White collars	n	25,902	16,303	42,205	27,453	17,550	45,003	28,593	18,092	46,685
Blue collars	n	0	0	0	155	0	115	0	0	0
Total	n	29,346	17,803	47,149	31,259	19,118	50,377	32,284	19,629	51,913

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [GRI 405-1b] Group

Percentage of employees by category and gender	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior Managers	%	77	23	100	80	20	100	80	20	100
Middle Managers	%	69	31	100	69	31	100	69	31	100
White collars	%	61	39	100	61	39	100	61	39	100
Blue collars	%	0	0	0	100	0	100	0	0	0

Percentage of Executives by age group and gender	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	%	0	1	0	0	0	0	0	0	0
>50	%	75	65	73	76	64	70	76	58	67
30-50	%	25	35	27	24	36	30	24	42	33

Percentage of Middle Managers by age group and gender	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	%	0	0	0	0	0	0	0	0	0
>50	%	73	67	71	73	66	69	72	63	67
30-50	%	27	33	29	27	34	30	28	37	33

Percentage of White Collars by age group and gender	u.m.	2023			2022			2021		
		Men	Donne	Total	Men	Women	Total	Men	Women	Total
<30	%	6	7	6	6	7	6	6	8	7
>50	%	60	41	53	59	41	50	58	39	48
30-50	%	35	52	41	35	52	44	36	53	44

## EQUAL PAY AND OPPORTUNITIES AT TIM

Percentage of Blues Collars by age group and gender	u.m.	2023			2022			2021		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	%	0	0	0	13	0	13	0	0	0
>50	%	0	0	0	55	0	55	0	0	0
30-50	%	0	0	0	32	0	32	0	0	0

Percentage of employees classified separately by other diversity indicators	u.m.	2023	2022	2021
Employees belonging to ethnic minorities	%	8	7	6
Employees with disabilities	%	3	3	3
Staff employees belonging to ethnic minorities	%	1	0	1

## EQUAL PAY AND OPPORTUNITIES AT TIM

### [GRI 405-2] BU Domestic

Ratio of the annual basic salary (RAL) of women than men by occupational category	u.m.	2023	2022	2021
Senior Managers	%	99	98	93
Middle Managers	%	96	95	95
White collars	%	95	92	92

Ratio of remuneration (RGA) of women than men by occupational category	u.m.	2023	2022	2021
Senior Managers	%	99	99	93
Middle Managers	%	95	93	94
White collars	%	94	92	92

### BU Brazil

Ratio of the annual basic salary (RAL) of women than men by occupational category	u.m.	2023	2022	2021
Senior Managers	%	89	100	100
Middle Managers	%	98	97	97
White collars	%	69	92	69

Ratio of remuneration (RGA) of women than men by occupational category	u.m.	2023	2022	2021
Senior Managers	%	86	100	100
Middle Managers	%	98	95	97
White collars	%	70	92	70

Salary (RAL) was taken to mean gross annual fixed salary. Remuneration (Annual Global Remuneration - RAG) was taken to mean RAL plus all individual incentive systems (MBO, Performance Bonus, Vendor Incentive).

**[405-2b]**  
See GRI 2-6 for the definition of significant place of business.

## WORKER HEALTH AND SAFETY

### NEGATIVE IMPACT - ACTUAL



#### [3-3 a, b]

Companies can generate an impact on the health, safety and wellbeing of workers, in terms of occupational injuries or illnesses, but also in terms of their psychological and physical wellbeing. The organization may generate impacts in the performance of typical general & administration activities of employees or indirectly through business relationships with its supply chain.

#### POLICIES AND COMMITMENTS

##### [3-3 c]

- TIM ensures full compliance with relevant legislation
- Alignment with national and international best practices
- Establishment of the Safety Steering Committee to intensify commitment, improve governance and foster integration between various corporate departments and improve execution
- Health and Safety Policy

#### KPI

##### [3-3 e]

- No. of injuries
- average duration of days' injury
- incidence of injuries per 100 workers
- Hours of training provided on the subject
- In Brazil Employee engagement as a related indicator

#### PLAN TARGETS

##### [3-3 e]

- Constant monitoring and containment of injuries and their average duration
- In Brazil Employee engagement equal to 82%

#### PROGRESS VS. TARGET

##### [3-3 e]

###### Group

- Slight decrease in the no. of injuries and average duration
- Decrease in the incidence of injuries per 100 workers (equal to 0.49 vs. 0.51 in 2022)
- Total training hours provided 106,106 or 8% of the total (5% in 2022)

###### Brazil

- Employee engagement pari a 86%

#### CERTIFICATIONS AND PROCESSES

##### [3-3 c, e]

ISO 45001

In Brazil TIM ranked 12th among 150 companies as Best Companies to Work for in the country

*The insights gained during activities and injury analyses have led to the constant updating of the management system, policies and procedures; experiments in the field, such as the introduction of Digital Safety, were also started.*

#### ACTIONS

##### [3-3 d, e]

###### Group

- Implementation of prevention measures and verification of their adequacy
- Specific investigations by local Safety units
- Promotion of technical and scientific research for more effective process management
- Promotion of liveable working environments
- Engagement of management and the entire organisation to develop an appropriate organisational culture
- Selection, management and control of contractors

###### Brazil

- Campaigns and regular communication for the dissemination of a focused health and safety culture
- Internal Accident Prevention Week
- Intranet channel for reporting safety incidents for employees and Whistleblowing channel for third parties
- Modo Você Campaign for promotion of mental health
- Well+Being Program

#### COLLABORATIONS

##### [3-3 f]

- Partnerships with business associations, authorities and competent bodies, to promote effective process management and foster the application of new digital technologies in the field of Health & Safety (H&S)
- Periodic information to workers, trade unions, authorities and other interested parties on health and safety issues
- Communication and awareness-raising campaigns with external entities, including through YouTube channels

## WORKER HEALTH AND SAFETY

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	Inherent risk level
<b>Worker health and safety</b>	<b>Health and Safety</b>	<b>High</b>

#### Risk calculation methodology

- Methodology: Monte Carlo model.
- Variables: Work hours lost annually due to occupational injuries and illnesses (net of hours reimbursed by INAIL, Italy's National Insurance Institute Against Accidents at Work), Near Miss evolution, Litigation with workers due to injuries, FTE (Full Time Equivalent) used to support local health authority inspections, local health authority sanctions, Average Hourly Labour Cost (MOI).

#### Activities performed

- Oversight of and integration with HSE and Compliance control processes maintained, in order to assess the effects of actual and potential accidents.
- Vertical model for analysing, assessing and managing health and safety risk analysed.
- In order to guide and make the company's action on occupational health and safety issues more incisive, a Safety Steering Committee was also set up, chaired by the CEO, with the aim of- Increasing Commitment,- Improving Governance - Fostering integration between the different company departments and Execution
- Quantitative model based on Monte Carlo simulation implemented.

## WORKER HEALTH AND SAFETY

### [403-1 a,b]

In Italy<sup>(2)</sup>, applicable regulations on health and safety in the workplace, in addition to requiring the definition of criteria for identifying and assessing risks, require an adequate participation and consultation of workers in this context, through workers' safety representatives.

- i) TIM ensures its management system conforms in full to the regulatory provisions of the Consolidated Law on Occupational Health and Safety (Legislative Decree 81/2008).
- ii) Regarding the management of office/mixed use buildings, the management system has been implemented according to UNI ISO 45001.

As far as non-employee workers are concerned, network companies and sole businesses operating for TIM S.p.A. in Italy comply with applicable regulations on health and safety in the workplace.

TIM's safety management system model fully involves all players participating in the safety process: company management, operational coordinators, company-appointed doctors, workers and workers' safety representatives.

In order to integrate and strengthen these initiatives, an

"Occupational Health and Safety Management Model" has been implemented in compliance with recognized standards (UNI ISO 45001), covering all processes relating to the design, construction, operation and maintenance of office and mixed-use property.

TIM S.A. establishes<sup>(3)</sup> guidelines and principles to be applied in all TIM's activities in Brazil, with the aim of promoting the continuous improvement of occupational health and safety actions.

The safety and health at work policy includes 3 fundamental commitments:

- a) prevention of accidents at work and protection of health;
- b) compliance with legal and other requirements of the organization;
- c) continuous improvement of the management system, with the aim of increasing safety and health performance.

Scope of application: employees, service providers, interns, young apprentices and visitors to the TIM Group's facilities in Brazil, including the TIM Institute.

The regulations relating to health and safety at work are based on national and international standards (ISO 14001) and best practices applicable to the Company.

<sup>(2)</sup> Perimeter: TIM S.p.A., Telecontact, Noovle, Fibercop, Sparkle, Telsy.

<sup>(3)</sup> Through PL 631 - Policy "Safety and health at work" and health at work policy safety and health at work

## WORKER HEALTH AND SAFETY

### [403-2 a.i, a.ii]

In Italy<sup>4</sup>, the identification and assessment of the risks present in the Company is governed by specific internal procedures and is guaranteed through the constant monitoring of company processes and their developments, in close connection with the line entities. Specialized internal resources operate to carry out this activity. Work activities are classified as low and medium risk, in line with the ATECO classification criteria of the National Institute of Statistics. At TIM S.p.A., as in other subsidiaries of the Group, there are no activities classified as high risk.

The TIM Group's commitment is also reflected in the sharing of information on best practices in order to constantly improve safety management for suppliers' workers.

In particular, the "Sicuri Insieme" project was launched a few years ago for network companies which operate in Italy for TIM S.p.A., divided into five subgroups:

- Construction sites and subcontracts
- Accidents at work
- Training, Information and Awareness on Occupational Safety
- Personal protective equipment and other equipment
- Work at height and in confined spaces<sup>5</sup>

The control measures applied to eliminate or contain risks include:

- health and safety training programs;
- i programmi di training in materia di salute e sicurezza;
- state-of-the-art personal and/or collective protective equipment;
- any necessary organizational arrangements made in collaboration with the lines that can guarantee an acceptable level of risk where this cannot be eliminated.

<sup>(4)</sup> Perimeter: TIM S.p.A, Telecontact, Noovle, Fibercop, Sparkle, Telsy.

<sup>(5)</sup> Work at height: work activities that expose the worker to the risk of falling from a height of more than 2 meters above a stable surface. Activities in confined spaces: activities carried out in underground tunnels and rooms - confined spaces with limited access openings and unfavorable natural ventilation - where TLC systems are present.

In Brazil, TIM S.A. identifies the hazards/aspects and risks/impacts of the activities, products and services that it can control and those that it can influence, considering the life cycle perspective, through direct observation of activities and operations, analysis of documents, including applicable legislation, occupational health and safety (OSH) inspections, reading procedures, instructions, records, process flow diagrams and the results of internal and external audits.

Activities/processes with the presence of potentially hazardous risk factors are carried out by duly qualified professionals and entail the provision of services.

TIM S.A. did not identify any unhealthy/hazardous conditions on the basis of the occupational risk management programs/analyses issued by qualified companies/professionals during the period.

The resulting programs are overseen by qualified professionals in the field of occupational health and safety and the environment. These processes provide inputs for the implementation of control measures and improvements with the aim of minimizing risks and ensuring a healthy working environment for both employees and external workers.

## WORKER HEALTH AND SAFETY

### [403-2 b]

In Italy<sup>6</sup>, the definition of safety roles allows each worker to know who to report any dangers and dangerous situations at work to. In addition, workers can also report the presence of any dangers through the CRM Facility System (Real Estate System for reporting) and the computerized procedure "Verification of supervisors and anomaly reporting".

In addition, the Sicuri Insieme project, launched in 2021, aims to create an event dedicated to safety, raise awareness among TIM staff and its business partners on the issue and share objectives and actions to be implemented.

In the 2023 edition, two companies of the group (Fibercop and TIM Servizi Digitali) were also involved.

In Brazil, there is the whistleblowing channel for employees and third-party workers. This official channel of the company guarantees anonymity when reporting hazards and risk situations in accordance with the whistleblowing channel policy.

### [403-2 c]

In Italy, workers are always required to take care of their own health and safety and that of other persons present in the workplace, impacted by their actions or omissions, according to the training they have received, the instructions and the equipment provided by the employer.

In fact, workers:

- must contribute to safety;
- must comply with the instructions and instructions given to them by the employer, supervisors and managers;
- must immediately report to the employer, manager or supervisor any deficiencies in equipment and devices;
- must not remove or modify safety, signaling or control devices without authorization;
- must have training;
- must undergo health checks.

In Brazil, there is the whistleblowing channel for employees and third-party workers. This official channel of the company guarantees anonymity when reporting hazards and risk situations in accordance with the whistleblowing channel policy.

### [403-2 d]

In Italy<sup>7</sup>, occupational accidents are analyzed through specific investigations aimed at analyzing the causes related to the event, also in order to arrange any corrective and improvement actions with the direct involvement of the lines concerned and the Human Resources & Organization Office department, for a greater synergy.

In Brazil, as described in the internal regulations - management of professional events - all events are analyzed by the team of occupational health and safety professionals, the causes are identified and action plans are drawn up with the aim of preventing further events of the same nature.

<sup>(6)</sup> Perimeter: TIM S.p.A, Telecontact, Noovle, Fibercop e Sparkle, Telsy.

<sup>(7)</sup> Perimeter: TIM S.p.A, Telecontact, Noovle, Fibercop e Sparkle, Telsy.

## WORKER HEALTH AND SAFETY

### [403-3a]

The health protection service for TIM S.p.A. personnel is entrusted to specialized suppliers operating in the following areas:

- health surveillance in accordance with the provisions of Legislative Decree 81/2008;
- health check-ups in accordance with Article 5 of Law 300/70;
- pre-employment check-ups;
- check-ups due to the postponement of maternity leave (Legislative Decree 151/2001);
- checks on any contraindications to act as assistant to the disabled in cases of emergency and related training.

In this context, to date, doctors have been appointed by the company, assigned on a regional/provincial/place of work basis. An additional doctor, independent of the doctors appointed by suppliers, has been specifically engaged, under contract, by TIM to hold the position of company-appointed coordinating doctor.

Approximately 16,300 workers are covered by one or more of the following health check-ups: risk of VDU work, risk of the manual handling of loads for technical positions, risk of working at height, risk of electromagnetic fields, chemical risk. The main profiles of workers covered by health surveillance are video terminal operators (approximately 9,900 workers) and field technicians (approximately 5,800 workers).

The HSE (Health Safety & Environment) department and local safety units monitor the activities of suppliers and the application of relevant contracts.

The operational guideline "Management of health controls in terms of health and safety at work" describes the responsibilities and operations inherent in the health protection process adopted by TIM

in terms of health and safety at work, from planning to organization, management and implementation of health controls.

In order to protect the health and safety of workers, monitoring campaigns are carried out every year, with instrumental surveys of physical factors, in particular: indoor and outdoor noise, electromagnetic fields, ionizing radiation, optical radiation, vibrations, outdoor and indoor microclimate parameters and lighting parameters of the workplace. If necessary, the substances and preparations used in the company and the exposure to chemical and biological agents in work activities are also verified.

In this regard, the commitment is also extended to network companies and sole businesses, which operate for TIM S.p.A. in Italy, that are required by law to comply with applicable laws on occupational health services. TIM S.p.A. requires compliance with applicable regulations on health and safety in the workplace in procurement contracts.

In Brazil, the Occupational Medical Control Programme (PCMSO) indicates the occupational medical check-ups related to environmental risk conditions, if any, as a condition for monitoring worker health. Occupational Health Tests (ASOs) are performed at the time of joining the company, on return to work, on dismissal, when changing duties and periodically, as described in the PCMSO.

## WORKER HEALTH AND SAFETY

### [403-4a]

Based on TIM S.p.A.'s corporate relationship model for safety, there are about 80 workers' representatives distributed throughout Italy. The number, the manner in which the workers' safety representatives are appointed or elected, as well as the paid working time and the resources for carrying out their duties are determined by collective bargaining.

In Brazil, TIM S.A. has an internal commission for accident prevention, which meets monthly to discuss issues related to accident prevention, health promotion and suggestions for improving processes.

At sites where the number of employees does not reach the minimum required for an Internal Accident and Harassment Prevention Commission (CIPA), the company shall designate at least one employee to fill this role. Employees can contact the HSE team to ask questions about occupational health and safety processes.

TIM S.A. provides information channels on its intranet on actions and campaigns relating to quality of life, accident prevention, health promotion and the environment. For non-employee workers, the safety system in the workplace is directly implemented by contracting companies, based on the directive of the "Regulatory Standard NR-05".

### [403-4b]

TIM S.p.A. has 5 committees (one for each territorial area and one for each national area) with mixed Company/Trade Union participation with specific functions in the field of workers' health and safety. 100% of the workforce in Italy is represented on committees. Meetings take place as necessary, and in any case three annual national meetings are scheduled for each committee as required by the 2019 industrial relations protocol.

In Brazil, 98% of the workforce is currently represented on health and safety committees.

## WORKER HEALTH AND SAFETY

### [GRI 403-5a] Group<sup>8</sup>

Health and safety training	u.m.	2023	2022	2021
Hours of health and safety training	h	112,540	133,516	172,772
Total training hours	h	1,847,089	2,708,738	5,316,361
Percentage of health and safety training hours out of the total	%	6	5	3

Among the numerous courses organized during 2023, the following are mentioned: first aid training, management of environmental emergencies, occupational safety and health, use of signs for road and motorway works.

As regards external workers who are employees of network companies operating in Italy for TIM S.p.A., mandatory training is provided for the activities that suppliers carry out in confined spaces<sup>9</sup> or areas suspected of pollution.

During 2023, there were 48 participants for 1.5 hours of training per capita (0 participants in 2022 and 168 participants in 2021 - 8 hours per capita).

Contracts with suppliers do not provide for hours of specific training, but in a spirit of cooperation, tools and best practices aimed at network companies and sole businesses (e.g. activities that involve work at height) are shared.

For TIM S.A., training courses are provided for newly hired employees on the subject of health and safety in the workplace, and the policy "POP 075 - HSE Management for Service Providers", which provides specific HSE training, is also for non-employee workers.

### [403-6 a,b]

For TIM S.p.A., ASSILT (the Association for supplementary health care for workers of TIM Group companies) pursues the non-profit aim of providing shareholders and beneficiaries with supplementary services in addition to those provided by the national health service, including, in conjunction with public health facilities, carrying out research, fact-finding surveys and group and individual health prevention actions, as well as promoting health education initiatives to protect the health and physical integrity of members. As of 31 December 2023, about 70,000 people were registered with the association, including over 36,000 employees and 33,000 pensioners,

<sup>(8)</sup> For the Domestic BU, with reference to accidents, detailed analysis of events continues and, where necessary, corrective actions are identified, with the direct involvement of the lines concerned and the HR Department for a greater synergy. In 2023, the process of detecting and managing "near misses" involved 100% of field technicians (about 6,200 resources) of the Chief Network, Operations & Wholesale Office and workers allocated to the Real Estate sector (about 650 resources).

<sup>(9)</sup> Activities in confined spaces are those that are carried out in underground tunnels and rooms where there are TLC systems. For these activities, Italian legislation provides for a number of specific risk control measures in order to work safely.

## WORKER HEALTH AND SAFETY

in addition to 47,000 beneficiary family members. In 2023, ASSILT paid out contributions for members of more than 51 million Euros. ASSIDA (the Association for Supplementary Health Care for Telecom Italia Group Executives) reimburses executives for health services in addition to those provided by the national health service. As of 31 December 2023, the association had 2,889 members and 496 registered managers, with a disbursement of approximately 13 million Euros.

In order to support the health prevention of staff, TIM gives all individuals aged 45 and over the possibility to take part in a flexible and personalized health prevention program, every two years.

Since 2019, TIM has created the "WellBeing Project", a program of initiatives and training courses aimed in particular at reducing stress, promoting movement and physical activity, improving lifestyles and safeguarding health. In addition, in collaboration with TIM myBroker (the new insurance brokerage company, wholly owned by TIM), the TIMmyHealth service has been set up - a Health Assistance policy that provides complete healthcare for the whole family and offers telemedicine services.

On the subject of health education to protect the health and physical integrity of workers, the flu vaccination campaign was promoted during 2023 in collaboration with ASSILT; to ensure an adequate immune response, TIM and ASSILT offered the opportunity to members, who did not fall into the categories for which vaccination was already provided by the national health service, to be able to get vaccinated free of charge.

In Brazil, the Company provides a health care program, called

Continuous Care, which includes a mental health program, a social service/personal support program, a pregnancy care program, and a program for people with chronic illnesses. Employees who wish to participate in the program are assisted by the partner company (Consultoria D'Or), with teleconsultations every two weeks.

The Company offers a program of emotional, psychological and social support: Apoio Pass is a service that offers social, legal, and psychological guidance with experts. Consultation is totally free, confidential and available by phone 24 hours a day, 7 days a week. The assistance provided by the social service in helping delicate social situations that require support and assistance help is important. The company has an exclusive allowance for dependent children with major health problems that make self-care impossible, regardless of the age of the dependent child. The program reimburses expenses for necessary items, such as diapers and equipment. The company continues to incentivize alternative work models, which allow for on-site and/or remote work, depending on the area/location. With this new model, employees can also request to work only remotely, on a temporary basis, due to the need to intensively care for a sick family member or even for some treatment they require and that does not prevent them from working according to their doctor. Some examples are treatments that entail only a few motor difficulties, or the need to stay at home to facilitate treatment. In addition to the usual occupational medicine professionals, the Company has a team of professionals specialized in health care who manage the plans offered. These professionals also study the epidemiological behavior of the population, to devise targeted programs or personalized care, where appropriate. All information related to the employee's health is covered by confidentiality.

## WORKER HEALTH AND SAFETY

### [403-7a]

TIM S.p.A. guarantees the fulfilment of all legal obligations in the field of Occupational Safety that have an impact on its customers and contractors in the context of ordinary customer-supplier relationships. In this sense, it ensures maximum collaboration and cooperation to minimize risks and ensure the safety of its own personnel and those of third parties.

The actions envisaged by this approach and applied to eliminate or curb risks are as follows:

- the implementation of various training programs in the field of health and safety, differentiated according to the risks and professional profiles present in the Company;
- the adoption of state-of-the-art personal and/or collective protective equipment, often designed ad-hoc in partnership with leading market multinationals;
- the definition of necessary organizational arrangements carried out in accordance with guidelines to ensure an acceptable level of risk where this cannot be eliminated.

As far as supply chain workers are concerned, as part of the supplier qualification process of the Domestic BU, specific questions on health and safety are envisaged, and the answers given are relevant for admission to the vendor list. Specifically, evidence of a health and safety management system and ISO 45001 and OHSAS 18001 certification, and of any convictions in the field of occupational safety, must be provided. In addition, the Open Es platform offers

support to suppliers through workshops, seminars and a community that is always open to discussion and sharing best practices.

Joint Audit Cooperation (JAC) is another tool chosen by the organization as part of a joint initiative between telecommunications operators, created with the aim of verifying, evaluating and promoting the adoption of principles and best practices for Corporate Social Responsibility (CSR).

In Brazil, TIM S.A. identifies, assesses and permanently monitors the hazards/aspects and risks/impacts of the activities, products and services that it can control and those that it can influence, considering the life cycle perspective, through direct observation of activities and operations, analysis of documents, including applicable legislation, the reading of procedures, instructions, records, process flow and the results of internal and external audits, based on TIM's internal regulations, such as: investigating environmental aspects and impacts, risks and hazards for health and safety at work, the management of chemical products.

TIM S.A. defines areas of potential risk, through specific control rules, limiting access to employees and to the personnel of qualified suppliers who are suitable for activities at the Company's sites.

## WORKER HEALTH AND SAFETY

### [GRI 403-8a.i, a.ii, a.iii] Group<sup>10</sup>

Employees covered by a health and safety at work system	u.m.	2023	2022	2021
Employees covered	n	46,634	50,377	51,913
Total employees*	n	49,328	50,377	51,913
Percentage of employees covered	%	95	100	100
Employees covered by a health and safety in at work management system that has been internally audited	u.m.	2023	2022	2021
Employees covered	n	10,469	10,384	10,648
Total employees*	n	49,328	50,377	51,913
Percentage of employees covered	%	21	21	20
Employees covered by a health and safety in at work management system that has been externally audited	u.m.	2023	2022	2021
Employees covered	n	8,336	8,347	3,716
Total employees*	n	49,328	50,377	51,913
Percentage of employees covered	%	17	17	7

\*The total refers to the average heads, and excludes TI Finance and TI Capital.

#### [403-8 b]

Temporary workers are excluded from this Domestic BU disclosure.

#### [403-8 c]

A new management system was implemented in compliance with recognized standards (ISO 45001) for the property under the

responsibility of the Real Estate department.

Some Group companies (Noovle and Sparkle Italia) also have a system certified by an external body and subject to internal auditing. Below are the data relating to employees covered by an occupational management and safety system for 2023.

<sup>10</sup>A new management system complying with recognized standards (ISO 45001) for property under the responsibility of the Real Estate department has been implemented.

## WORKER HEALTH AND SAFETY

### [403-8 b, c]

TIM S.A., through its internal health and safety policy, establishes guidelines and principles to be applied in all TIM's activities in Brazil, with the aim of promoting the continuous improvement of occupational safety and health actions.

The safety and health at work policy includes 3 fundamental commitments:

- a) prevention of accidents at work and protection of health;
- b) compliance with legal and other requirements of the organization;
- c) continuous improvement of the management system, with the aim of increasing safety and health performance.

## WORKER HEALTH AND SAFETY

### [GRI 403-9a] Group

Accidents - Employees	u.m.	2023	2022	2021
Accidents recorded at work (including deaths)	n	250	259	239
Occupational accidents with serious consequences (>6 months' absence), excluding deaths	n	1	3	1
Travel accidents (only if transport was arranged by the organization)	n	0	0	4
Number of deaths as a result of work-related injuries	n	0	0	0

Hours worked - Employees	u.m.	2023	2022	2021
Hours worked	h	69,690,057	73,886,548	79,947,742

Accident rates (Frequency indices) - Employees	u.m.	2023	2022	2021
Death rate	%	0.00	0.00	0.00
Rate of commuting accidents (only if transportation was arranged by the organization)	%	0.00	0.00	0.05
Rate of work-related injuries with serious consequences (>6 months of absence), excluding fatalities	%	0.01	0.03	0.01
Rate of recordable occupational accidents (including fatalities)	%	3.59	3.51	2.99

*The rates calculated for employees are based on 1,000,000 hours.*

The rates shown are calculated without taking into account accidents and lost hours resulting from accidents involving managers or occurring when commuting, nor so-called medication accidents, which therefore did not result in absences of at least one day (UNI 7249:2007 standard); temporary workers are not considered.

Group injury indicators - Employees	u.m.	2023	2022	2021
Severity index (conventional days lost through accidents per 1,000,000 hours worked)	gg/h	0.11	0.12	0.12
Frequency index (no. accidents/(total hours worked/1,000,000))	n/h	3.40	3.51	2.99
Average injury duration in days	gg	32.21	36.16	39.81
Unproductivity index (hours lost to injury per thousand worked)	h	0.69	0.76	0.78
Accidents per 100 workers	%	0.49	0.51	0.47

## WORKER HEALTH AND SAFETY

### [403-9c, d]

Domestic BU is responsible for identifying and assessing risks to the safety and health of workers with a view to their progressive elimination or minimization by adopting the principles, standards and solutions that constitute international good business practices and considering, as a basic requirement, compliance with existing regulations.

For the Domestic BU, the Company plans the activities, resources and objectives of the risk assessment process, identifying the business processes involved, the workers involved, and the tools, techniques and methodologies to be used. In this context, information is collected, documentary and field investigations are carried out, to enable the sources of danger and exposed persons to be identified, and all information and data necessary for a correct assessment are acquired. The constant monitoring of any accidents makes it possible to highlight any critical areas in order to adopt corrective or improvement actions.

In 2023, there was 1 accident at work that had serious consequences in terms of days' absence (with a prognosis greater than 180 days): the accident concerned a fall due to slipping in general, while working remotely from home.

Accidents at work with serious consequences are the subject of in-depth studies in order to identify possible improvement actions.

With regard to third-party workers, in particular network companies, a guideline is in force, attached to the contract, which provides for the methods for reporting accidents occurring during work on behalf of TIM, both for activities managed directly and for subcontracted activities.

Absolute data on accidents regarding network companies over the

last three years are available: 2021: 73; 2022: 98; 2023: 70.

Accidents at work are investigated in-depth by the local Safety units which, through specific investigations, identify the causes of accidents (which may be attributable to the behavior of the worker, the work context and/or external factors) also assisted by the injured person himself and other company positions involved (such as the person in charge who supervises the work activity). The purpose of the investigations is to highlight any critical areas to target with improvement actions, that may concern, for example, awareness-raising interviews, updating training/information, actions to restore plants/infrastructures and even updating the risk assessment.

In Brazil, the "POP 075 HSE Management for service providers" policy is dedicated to the safety of suppliers' personnel who access the company's offices. TIM S.A. identifies, assesses and monitors hazards and risks based on the detection of environmental aspects and impacts, hazards and risks to health and safety at work.

Measures to eliminate and minimize hazards are guided by the Risk Inventory and the Occupational Medical Control Programme (PCMSO).

### [403-9e]

The rates calculated for employees are based on 1,000,000 hours.

### [403-9f]

In the data for salaried staff, temporary employees are not counted

### [403-9g]

Useful data for reading purposes are given in the footnotes in the tables

## WORKER HEALTH AND SAFETY

### [403-10 a.i, a.ii] Group

Occupational diseases - Employees	u.m.	2023	2022	2021
Number of recordable cases of occupational diseases	n	8	4	6
Number of deaths from occupational diseases	n	0	1	0

### [403-10a.iii]

For TIM SpA, the main types of occupational diseases concern pathologies of the musculoskeletal, respiratory and auditory systems.

### [403-10c]

For TIM SpA, the Company identifies and assesses risks to the safety and health of workers, with a view to their progressive elimination or minimization by adopting the principles, standards and solutions that constitute international good business practices and considering, as a basic requirement, compliance with existing regulations. The Company plans the activities, resources and objectives of the risk assessment process, identifying the business processes involved, the workers involved, and the tools, techniques and methodologies to be used. In this context, information is collected, documentary and field investigations are carried out, to enable the sources of danger and exposed persons to be identified, and all information and data necessary for a correct assessment are acquired. The constant monitoring of any occupational diseases makes it possible to highlight any critical areas in order to adopt corrective or improvement actions.

### [403-10d]

All TIM SpA employees are included in this disclosure.

### [403-10e]

In Italy, as far as occupational diseases are concerned, reports submitted to INAIL (the National Insurance Institute Against Accidents at Work) in the reporting year and subject to a recognition process were taken into consideration.

# MANAGEMENT OF MATERIAL TOPICS

## EMERGING INFRASTRUCTURES AND TECHNOLOGIES

POSITIVE IMPACT - ACTUAL

### [3-3 a, b]

Companies in the telecommunications sector are engaged in research and development relating to emerging infrastructures and technologies such as robotics, artificial intelligence, augmented and virtual reality, etc. that promote new business models.

#### POLICIES AND COMMITMENTS

### [3-3 c]

- The three-year Technology Plan, an integral part of the business plan, identifies the technological strategy in terms of guidelines, specific technologies and a roadmap for adoption by the Group and its subsidiaries
- Business Continuity Management Policy
- in Brazil, Committee for Artificial Intelligence

#### KPI

### [3-3 e]

- No. of innovative and experimental projects
- Available bandwidth and number of complaints for malfunctions on tried and tested solutions
- Monitoring of energy consumption thanks to the use of artificial intelligence
- Service interruption number

#### PLAN TARGETS

### [3-3 e]

- Completion of innovative projects
- Minimizing malfunctions in experimental projects
- Optimizing energy consumption (PUE)

#### PROGRESS VS TARGET

### [3-3 e]

#### Domestic

- The various design phases are implemented, and their progress constantly monitored until the final release of the developed platforms and the closure of the projects

#### ACTIONS

### [3-3 d, e]

#### Domestic

- Evolution of services and applications such as virtual reality, cloud computing, gaming that require an increasingly high network performance and innovative solutions
- Launch of the platform that enables smart mobility in collaboration with Google Cloud on TIM's Edge Cloud 5G technology, which will allow the development of new applications dedicated to connected cars and smart transport. Thanks also to artificial intelligence, smart mobility will improve transit times and methods, with positive impacts in terms of sustainability. In addition, thanks to the Edge platform, it is possible to collect and process data locally, avoiding the transfer of large amounts of data and thus limiting the expenditure of energy and associated CO2 emissions.
- Use of a methodology and processes to pursue the continuous improvement

of energy performance, with an increasingly important role played by Artificial Intelligence

- Experimentation in Healthcare 5.0 to enable remote interventions

#### Brazil

- Monitoring and reporting of commitments to Anatel
- Development of plans for critical activities
- Annual implementation of Risk Maps, resilience and operational continuity plans
- Network monitoring through the Intelligent Service Operation Center
- Four-monthly reporting for executive boards



## EMERGING INFRASTRUCTURES AND TECHNOLOGIES

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- ISO 50001:2018
- ISO 22301 per Business Continuity Management System

*The relevance of the topic for TIM highlights the importance of continuous investment in smart solutions with a high innovation content as a necessary condition for the proactive management of the positive impacts associated with the issue. The company's experience and certifications obtained have enabled the identification of best practices that have been integrated into business processes.*

### COLLABORATIONS

#### [3-3 f]

- Development of virtuous ecosystems for scouting, incubation and planning innovative initiatives and best practices
- Collaborations with Vendors
- Collaboration with Universities
- Participation in the national Barium project in which TIM provides operating theatre and remote site where the surgeon works
- Cooperation with Modena Automotive Smart Area, with particular reference to the University of Modena and Reggio Emilia, regarding the deployment of smart mobility solutions on Edge Cloud 5G infrastructure
- TIM Lab Innovation Center to develop relationships with major suppliers and technological partners and promote research into and the development of new solutions; since January '23, the new TIM Lab space in São Cristóvão, Rio de Janeiro

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Emerging infrastructures and technologies	Technological	High

#### Risk calculation methodology

Methodology: Game theory and the Monte Carlo model.

- Variables: FTTX network coverage requirements, FTTX revenue activations trend, TIM-FiberCop-KKR partnership agreement constraints, Reference inflation context trend.

Commodity price volatility, Gross Domestic Product (GDP) evolution, Customer Base, ARPU, perceived quality level (Customer Satisfaction Index), benchmark competitors.

#### Activities performed

• In order to guarantee transparency and fairness in business management to its stakeholders, the TIM Group has defined a robust internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect business activity, including ESG risks, allowing it to create assumptions useful for planning and implementing initiatives aimed at managing potential and actual negative economic, social and environmental impacts.

The Domestic BU has continued the process of strengthening an innovation model that relies on the concept of the ecosystem, essential for fuelling a virtuous circle for scouting, incubation and planning innovative initiatives. During the year, the Domestic BU made specific commitments with the aim of giving relevance to the identified impact, to support innovation geared towards the digital transformation of society, also through the use of artificial intelligence.

# MANAGEMENT OF MATERIAL TOPICS

## ETHICS AND CORPORATE GOVERNANCE

### NEGATIVE IMPACT - POTENTIAL

#### [3-3 a, b]

A behaviour that does not comply with the Corporate Governance system (such as the code of conduct, guidelines, internal control mechanisms and procedures), adopted by companies to supervise their operation and management, can have impacts on growth and long-term value creation for shareholders and the protection of stakeholder interests. The Company could be involved in any negative impacts directly in the exercise of its activities or also as a consequence of business relationships with suppliers, public bodies, political representatives or trade associations.

#### POLICY E GLI IMPEGNI

##### [3-3 c]

- Internal control and risk management system and related guidelines (September '23)
- Code of Ethics and Conduct
- Organizational model 231
- Anti-Corruption Policy
- Anti-corruption system (AMS)
- Tax Strategy
- Whistleblowing Procedure
- SCIGR Steering Committee
- TIM Integrity Programme which ensures anti-corruption compliance in Brazil

#### CERTIFICATIONS AND PROCESSES

##### [3-3 c, e]

- ISO 37001

*The progress made towards achieving objectives and certifications awarded are representative of the continual improvement of the processes and management system implemented by the Group through processes and procedures.*

#### KPIs

##### [3-3 e]

- No. of incidents of corruption
- Tax disputes
- Income taxes paid locally
- Monetary losses related to proceedings for anti-competitive behaviour
- Anti-corruption training

#### COLLABORATIONS

##### [3-3 f]

- Participation in several training, insight and awareness-raising initiatives on legal issues
- Participation in the Business Integrity Forum promoted by Transparency Italia for the dissemination of tools to support integrity, transparency and anti-corruption
- Participation in technical discussions, at an international level and within international bodies and institutions, on tax policy issues.

#### PLAN TARGETS

##### [3-3 e]

Management and containment of events and impacts related to:

- Incidents of corruption
- Tax disputes
- Proceedings for anti-competitive behaviour

#### ACTIONS

##### [3-3 d, e]

- Internal controls and monitoring of sensitive activities by carrying out tests under the supervision of the Compliance Unit
- Constant monitoring of sensitive and at-risk activities
- Assurance and audit activities to verify compliance with laws
- Adaptation of the internal control system and redemption plan
- Constant communication and training for employees regarding the Anti-corruption management system
- Training/information for corporate bodies regarding regulatory updates
- Constant monitoring of 20 activities considered sensitive to corruption risk

#### PROGRESS VS TARGET

##### [3-3 e]

#### Group

- No sanctions or settlements in relation to incidents of corruption in the last 3 years
- No supply contracts interrupted in the last 3 years for reasons attributable to corruption

- Management of proceedings with the Authorities and
  - the implementation of corrective actions to resolve the findings received
- Regarding taxation:
- Direct management and supervision of tax compliance
  - Prior assessments and information to top management on the tax impacts of extraordinary and business operations
  - Periodic reporting to management bodies
  - Monitoring of legal developments
  - Consultancy and training for Group companies
  - Oversight and prevention of tax risks through a tax risk control system (Tax Control Framework)



## ETHICS AND CORPORATE GOVERNANCE

### [GRI 201-1] TIM Group

Economic value produced, distributed and retained	u.m.	2023	2022	2021
a) Total revenues and operating income	millions €	16,502	16,001	15,588
b) Interest income and dividends collected	millions €	157	276	165
c) Capital gains (losses) from non-current assets	millions €	-11	36	1
d) Economic value produced directly (a+b+c)	millions €	16,648	16,313	15,753
e) Operating costs	millions €	7,695	7,369	7,467
f) Personnel costs	millions €	2,987	3,180	2,941
g) Lenders	millions €	2,004	1,439	1,580
h) Taxes and duties	millions €	187	-476	110
i) Distributed economic value (e+f+g+h)	millions €	12,873	11,512	12,098
Economic value retained (d-i)	millions €	3,775	4,801	3,656

### [201-1 b]

The TIM Group's operating segments, organized for the telecommunications business taking into account geographical location, are as follows:

- Domestic: includes the activities in Italy relating to voice and data services on fixed and mobile networks for end customers (retail) and other operators (wholesale), the activities of the Telecom Italia Sparkle group which, in the international field (in Europe, the Mediterranean and South America), operates in the development of fiber optic networks for wholesale customers, the activities of Fibercop S.p.A. for the supply of passive access services for the secondary copper and fiber network, the activities of Noovle S.p.A. (Cloud and Edge computing solutions), the activities of Olivetti S.p.A. (products and services for Information Technology) and the support structures for the Domestic sector;

- Brazil: includes mobile and fixed telecommunications activities in Brazil (TIM S.A. group);
- Other activities: include financial companies (Telecom Italia Capital S.A. and Telecom Italia Finance S.A.) and other smaller companies not strictly linked to the TIM Group's core business.

### [205-1 a]

TIM S.p.A. includes a special "anti-corruption clause" in the contracts stipulated. As part of this clause, compliance with anti-corruption regulations (including the US (FCPA) and UK (Bribery Act)), the Code of Ethics and Conduct and the Group Anti-Corruption Policy is required. In 2023, 52 contracts required specific intervention by the Compliance Department, 7 of which related to the Group's national

## ETHICS AND CORPORATE GOVERNANCE

subsidiaries. In addition, the Company carries out due diligence activities on Third Parties and, during 2023, no red flags attributable to possible corruption were highlighted. In particular, 1,429 due diligence exercises were carried out in 2023.

20 sensitive activities were identified by TIM S.A. in Brazil during 2023.

### [205-1 b]

In 2019, TIM S.p.A. adopted the Anti-Corruption Management System that applies to the Company, the members of its corporate bodies, employees and external staff and partners in various capacities.

In relation to subsidiaries, the SGA or specific safeguards for the prevention of corruption must be adopted, to the extent that this is reasonable and in proportion to the risks of corruption to which such controlled organizations are exposed. With regard to the latter, it should be noted that TIM Brazil standard (15 March 2021), Olivetti S.p.A. (11 May 2022), Telecontact S.p.A. (21 July 2022), Telecom Italia Trust Technologies S.r.l. (6 June 2022) and, most recently, TI Sparkle S.p.A. (6.11.2023) were certified to ISO 37001.

As part of this Anti-Corruption Management System, TIM S.p.A. assessed a total of approximately 650 operating units as per UNI ISO 37001:2016 certification obtained by TIM S.p.A. in 2019 and reconfirmed in the years 2020-2021 and, most recently, on 13 October 2022 (expiry date 13 October.2025).

All of these operating units (100%) are included in the assessment for risks related to corruption within TIM S.p.A.

In addition, TIM S.p.A. analyzed the significant risk scenarios concerning conduct attributable to both active and passive

corruption, both directly and indirectly, and towards both public and private entities.

As a result of the Anti-Corruption Risk Assessment activities, TIM S.p.A. identified the following areas at risk of forms of active/passive corruption:

- general - control environment - governance
- procurement, purchasing, supplier relations, accounts payable
- investments (including network infrastructure and IT systems)
- financial statements, financial reporting, accounting entries
- sales, marketing, customer acquisition (including commissioning)
- logistics (warehouse)
- human resources
- financial (treasury, finance-banking)
- fiscal.

In addition, with reference to TIM S.p.A.'s 231 Organizational Model and with reference to the risk areas listed above, the following sensitive processes exposed to the risk of corruption have been identified:

- gifts and entertainment expenses
- events and sponsorships
- donations/membership fees
- consultancy, brokerage, relations with Business Partners and suppliers or sub-suppliers and similar figures
- financing arrangements
- joint ventures, acquisitions and disposals
- sale of goods and services
- relations with Institutions/Authorities
- authorizations and concessions
- facilitated finance
- judicial and arbitration proceedings
- occupational health and safety requirements- - environmental

## ETHICS AND CORPORATE GOVERNANCE

protection requirements

- recruitment and personnel management
- operations carried out by the Company's Top Management.

With reference to Third Parties, TIM S.p.A. has identified the relationships that may present risk profiles in relation to anti-corruption regulations. Such risks may arise (i) from the type or nature of the relationship (Relevant Relations) and (ii) from the characteristics of the third party or the activities carried out by it (Relevant Third Parties).

With regard to Relevant Relations, the following have been identified:

- Relations with Public Administration bodies: these concern, in particular, relations with the PA as a client, for obtaining administrative or judicial measures, for carrying out controls and inspections, for meeting regulatory obligations or for obtaining financing;
- Relations with customers and suppliers: these cover the entire business cycle of the Company, and present risk profiles for both active and passive corruption;
- Relations with other private entities: these concern private entities of any kind that carry out institutional, professional or business activities (for example, ratings agencies, project financing bodies in which TIM S.p.A. participates or companies that participate in joint ventures or consortia), in the performance of which TIM S.p.A. may have an interest as advantages or disadvantages for the Company may depend on this.

Relevant Relations do not include relationships with customers who are natural persons who have an existing relationship with the

Company as end users of the products/services sold by TIM S.p.A.

With regard to Relevant Third Parties, the following have been identified:

- Beneficiaries of sponsorships and contributions: these are beneficiaries of sponsorship initiatives so-called sponsees-, donations typically relating to projects of a social nature or contributions in cash, in kind or credits in exchange for subscription to participation shares;
- Consultants and professional providers, agents and brokers, Business Partners, non-employee workers: these are service providers, including sub-agents and similar, that TIM S.p.A. may use in the pursuit of its business activities;
- Suppliers of goods and services: these are suppliers of goods and services, including sub-suppliers and similar, other than those referred to in the previous point;
- Third Parties involved in extraordinary transactions: These are the target companies of possible extraordinary transactions such as mergers or acquisitions;
- Partners in joint ventures: these are the legal entities with which TIM S.p.A. enters into joint venture agreements and/or establishes permanent corporate structures, for the joint management of a specific business or project;
- Candidates for employment: these are persons who are assessed in relation to reputational aspects, including any situations of conflict of interest, in order to be included in the company's workforce.  
In addition, job positions with a risk of corruption that is not low

## ETHICS AND CORPORATE GOVERNANCE

(Relevant Positions) are identified as follows:

- a manager or employee of the Company that represents or acts on behalf of TIM S.p.A. with reference to activities or relations with Third Parties that present Corruption risk profiles;
- a manager or employee of the Company who has the role of manager with decision-making functions in processes that present Corruption risk profiles.

Finally, the Company has an IT support system in place to assess Third-Party risk (currently, the system is operational for evaluating suppliers and agents) through Anti-corruption Due Diligence activities.

In Brazil, according to TIM S.A.'s Corporate Risk Management Policy, a Corporate Risk Management (ERM) process is adopted to identify and manage risks that may compromise corporate objectives and the effective adoption of related mitigation measures. In this context, the Compliance Board is involved in the process of identifying and assessing risks, including with regard to the risk of corruption and respective mitigation controls and continuous monitoring of certain activities considered sensitive for this type of practice.

The Governance & Integrity Compliance area carries out an annual assessment of the risks of Sensitive Activities and relates them to relevant processes, the areas and functions responsible for these processes, the stakeholders involved, the risk scenarios and their respective mapped controls, the assessment of the results of the controls and the risk assessment. The objective of the corruption risk assessment is to enable the Company to establish the basis for the Anti-Corruption Management System (SGAA in Portuguese) through:

- the identification of the main corruption risks that the EMS

intends to monitor;

- the assessment of these risks and the adequacy of the controls implemented to mitigate them.

In particular, in order to carry out the corruption risk assessment, specific factors are taken into account such as the location and sectors of activities, their nature and complexity, any third parties and the relations maintained. In carrying out these activities, TIM Brasil:

- identifies corruption risks that can reasonably be expected, identifying processes that are likely to be corrupted;
- analyses and evaluates the risks mentioned, documenting the methodologies used, to map the processes at risk;
- assesses the adequacy and effectiveness of TIM's controls in force to mitigate the corruption risks identified.

The Company establishes the criteria for assessing the risk of corruption, taking into account TIM's internal policies and objectives. This assessment shall be carried out and verified by the Compliance Function as part of the risk assessment:

- on a regular basis, so that changes and new information can be properly assessed on the basis of the terms and deadlines set for this purpose;
- and in the event of a significant change in the structure or business of TIM Brasil.

In order to combat corruption, special attention and a constant monitoring of certain activities considered sensitive (Sensitive Activities) are indispensable. The result of the annual Anti-Corruption Risk Assessment identifies the relations, third parties, roles and activities with a medium to high level of exposure to corruption risk. In general, the assessment of the risk of corruption therefore depends on:

## ETHICS AND CORPORATE GOVERNANCE

- the type or nature of the relationship (sensitive relationships);
- the characteristics of third parties or the activities they carry out (sensitive third parties);
- the role played by the employee (sensitive roles);
- certain activities that are considered sensitive (sensitive activities).

Following the risk assessment process, the Company has identified the following sensitive activities, detailed below:

- Agreements;
- Judicial, administrative, and arbitration proceedings;
- Authorizations and licenses;
- Relations with public officials, institutions, authorities, trade unions and associations;
- Receiving and/or offering goods, services and/or invitations to events free of charge;
- Entertainment expenses;
- Events;
- Commercial and institutional sponsorships;
- Donations to non-profit organizations;
- Subsidized loans and financing;
- Purchases of goods and services;
- Sales of goods and services;
- Hiring of employees;
- Management of employees' variable compensation incentives;
- Health, safety and environment;
- Investments;

- Business partners;
- Payments;
- Acquisition and sale of shareholdings and/or assets and/or incorporation of companies;
- Transactions carried out directly by the Company's Chief Executive Officer.

No acts of corruption in 2023 were identified.

### [205-2 a]

The Board of Directors approves the Anti-Corruption Policy, the Code of Ethics and Conduct, the 231 Organizational Model and the Compliance Management Plan relating to TIM S.p.A.'s Anti-Corruption Management System and receives information on its progress. Similarly, the Boards of Directors of the national subsidiaries approve the Group's Code of Ethics and Conduct, their 231 Organizational Model, the SGA in the case of ISO 37001 certified companies, as well as the Anti-Corruption Policy (previous version, in the case of non-ISO 37001 certified companies).

In the same way, the Board of Directors of TIM Brasil approves the Company's Code of Ethics and Conduct in line with the Group's Code, an international version of the 231 Organizational Model in line with local regulations and the Anti-Corruption Management System pursuant to the ISO 37001 standard.

Finally, the Boards of Directors of the main foreign companies of the Sparkle Group adopt an international version of the 231 Organizational Model, in line with relevant local regulations.

### [205-2 b]<sup>2</sup>

	u.m.	GROUP		BU DOMESTIC		BU BRAZIL	
Executives	n. e %	549	100%	469	100%	79	99%
Middle Managers	n. e %	4,575	100%	4,163	100%	406	100%
White collars	n. e %	43,134	98%	34,699	98%	8,435	95%
Blue collars	n. e %	88	100%	88	100%	0	0%

<sup>(2)</sup> Employees (blue collars) of TSD were notified (Table 205-2b), but not trained (Table 205-2 e), and the latter were not counted as of 31/12/2023 because the company has been liquidated.

## ETHICS AND CORPORATE GOVERNANCE

### [205-2 c]

TIM S.p.A. publishes the Code of Ethics and Conduct, the Anti-Corruption Policy and the Anti-Corruption Manifesto on the Group's supplier portal.

The main Partners can be suppliers of goods and services, consultants/professional providers, partners of the indirect commercial network, as well as OLOs.

In addition, the Anti-Corruption Policy, the Code of Ethics and Conduct and the so-called 231 Organizational Model (General Part) are disseminated to all stakeholders through publication both on the website and on the intranet.

Finally, TIM S.p.A. includes a special "anti-corruption clause" in the contracts stipulated with its business partners. As part of this clause, it is required to read the Code of Ethics and Conduct, the Anti-Corruption Policy of TIM S.p.A. and the 231 Organizational Model.

In particular, Order Forms are issued with the clause requesting acceptance of the above-mentioned documents.

Moreover, a video interview on the Code of Ethics and Conduct, MO 231 and Anti-Corruption Policy for third parties was produced in 2023, and used by 111 senior accounts.

TIM Brasil does not communicate to third parties and has no visibility of the number of outsourced employees, but everyone is aware

of the Anti-Corruption Policies when they sign the Service Supply Agreement with TIM Brasil.

### [205-2 d]

The Board of Directors of TIM S.p.A. carries out, if necessary, induction sessions that also include anti-corruption compliance issues.

It should also be noted that, on the occasion of updates to the Code of Ethics and Conduct (15 March 2023), which also deals with anti-corruption issues, the Company has:

- updated the External Site pages, publishing the document there;
  - published news on the intranet portal, publishing the document there;
  - published video interviews and video clips of the Group's new ethical values and on topics related to anti-corruption (e.g. video clips on ISO 37001) on the intranet;
- and that these sites/portals are accessible to members of the Board of Directors.

At TIM Brasil, all members of Top Management were informed of their anti-corruption policies and procedures.

### [205-2 e]<sup>2</sup>

	u.m.	GROUP		BU DOMESTIC		BU BRAZIL	
Executives	n. e %	512	93%	423	90%	79	99%
Middle Managers	n. e %	1,659	36%	1,202	29%	406	100%
White collars	n. e %	20,968	48%	11,024	31%	8,843	100%
Blue collars	n. e %	0	0%	0	0%	0	0%

<sup>(1)</sup> Employees (blu collars) of TSD were notified (Table 205-2b), but not trained (Table 205-2 e), and the latter were not counted as of 31/12/2023 because the company has been liquidated.

## ETHICS AND CORPORATE GOVERNANCE

### [205-3 a, b, c]

TIM S.p.A. is not aware of any episodes of corruption that, to date, could affect it.

TIM S.p.A. is not aware of any episodes of corruption against it, which is why there have been no dismissals of employees or measures issued against them for facts and issues relating to this offence.

As far as suppliers are concerned, in the last 3 years, TIM S.p.A. has not terminated contracts for reasons attributable to corruption.

No cases of corruption were recorded in Brazil in 2023.

### [205-3 d]

TIM S.p.A. is not aware of any lawsuits filed against it related to corruption.

For Brazil, the information is not available.

### [206-1 a] BU Domestic

	2023	2022	2021
Anti-competitive behaviour	2	2	2
Violations of antitrust regulations and related to monopolistic practices	1	1	1

### [206-1 a] Brazil

	2023	2022	2021
Anti-competitive behaviour	0	0	0
Violations of antitrust regulations and related to monopolistic practices	0	0	0

### [206-1 b]

With reference to Anti-Competitive Conduct: actions are still pending at first instance.

With reference to violations of antitrust and monopolistic practices: the judgment in 2021 was favorable for TIM and continues in the second instance.

With reference to Anti-Competitive Conduct: for 2023, actions are still pending, one as an appeal and one as a first instance

With reference to violations of antitrust and monopolistic practices:

for 2023, the unfavorable outcome in the second instance is continuing with revocation proceedings.

In Brazil, 10 lawsuits were initiated in 2023, with 2 proceedings completed during the year. No new legal action was initiated during 2023. Of the 12 cases notified in 2022, 2 cases were closed during 2023.

## ETHICS AND CORPORATE GOVERNANCE

### [207-1 a]

Since 2017, TIM has adopted its own Tax Strategy in order to define the objectives and principles adopted by the company in the management of taxation, both at company level and in relations with the tax authorities.

This strategy is approved by the Board of Directors and is promptly updated in the event of changes at the strategic and/or operational level.

TIM, in compliance with the "general principles" set out in the Code of Ethics and in respect and independently of its management choices, intends pursuing a tax strategy inspired by the principles of honesty, fairness and compliance with tax legislation.

To this end, TIM undertakes to:

- always operate in compliance with tax laws and regulations in all the countries where it operates, observing their spirit and purpose, ensuring effective tax protection through (i) the monitoring of legal developments, (ii) the management of its application and (iii) regular reporting and necessary corporate training to disseminate knowledge at all levels through periodic and systematic deployment actions;
- not undertake acquisitions or investments in States or territories with a privileged tax regime, unless they are functional to the company's commercial purposes and have as their objective the development of the business activities included in the corporate purpose;
- carry out crossborder intragroup transactions according to the arm's length principle, as established by the OECD (Transfer Pricing Guidelines).

### [207-2 a]

TIM's Board of Directors, whose assessments and decisions are supported by an adequate investigation by the Control and Risk Committee, is responsible for periodically verifying the adequacy of the internal control and risk management system, of which the tax risk management system is an integral part, as well as its effective functioning.

The TIM Group has adopted a tax risk management and control system that provides for a governance model designed to ensure that:

- i. top management is informed of the tax impacts related to all strategic operations and operational business activities, planned and to be carried out, to ensure that business decisions are consistent with the defined tax strategy;
- ii. the Tax Department is involved in carrying out ordinary and extraordinary business activities, to ensure a prior assessment of the tax implications of these activities and the correct management of the tax variable

To this end, the incentive system of the Tax Department does not provide for specific objectives related to the reduction of the tax rate. TIM trains and supports all personnel involved in the management of tax-relevant activities, which are not just limited to resources dedicated specifically to tax matters, in order to ensure that all employees have the right skills and experience to meet their responsibilities. In order to achieve this goal, TIM invests in the professional growth of its staff, including through specific training plans.

TIM's employees and management at all levels are required to base their conduct on the "general principles" set out in the Code

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of Ethics, such as honesty, fairness, transparency, confidentiality, impartiality, diligence, loyalty and mutual respect.

Failure to comply with these principles may result in legal action and the adoption of measures against the recipients, in accordance with the provisions of the Code of Ethics.

The company's top management informs Management and all employees involved about the aforementioned values and codes of conduct in the area of taxation, incentivizing and appropriately recognizing virtuous behavior and sanctioning recognized violations, according to the aforementioned "Tone at the Top" principle. TIM's goal is to minimize tax risks.

To this end, TIM:

- does not carry out transactions that mainly pursue a tax advantage and that do not respond to business logic, i.e. transactions carried out "artificially" with the sole purpose of reducing taxation;
- pursues a reasonable line of interpretation, inspired by the principles of legality, in cases where tax legislation raises interpretative doubts or application difficulties;
- ensures constant dialogue with the Revenue Agency on potentially controversial issues or issues of dubious interpretation in the case of complex corporate, financial or commercial transactions with tax-relevant outcomes, regardless of hypotheses of presumed abuse of rights/avoidance of a transaction, as well as in the event of possible non-application of anti-avoidance rules.

To ensure effective control of tax risk, TIM has adopted a system for detecting, measuring, managing and controlling tax risk (Tax Control Framework), governed by a specific Tax Policy, which provides for the following:

1. a clear attribution of roles and responsibilities;
2. effective procedures for the detection, measurement,

management and control of tax risks;

3. effective internal procedures aimed at ensuring, at all business levels, compliance with tax obligations;
4. effective procedures to remedy any deficiencies found in the functioning of the system and to activate the necessary corrective actions;
5. reporting to management bodies, through a report made at least annually on the activity carried out.

### [207-2 b]

TIM, in compliance with principles of honesty, fairness and compliance with tax legislation, considers it essential to prevent the risk of unethical or illegal behavior, with consequent reputational and financial impacts.

To this end, each department is required to request a prior opinion from the competent Tax Office on the tax consequences of any new cases that concern its area of operation.

In addition, TIM has adopted a whistleblowing procedure through which each employee is required to report, via a dedicated portal, cases of suspected fraud with tax impacts, i.e. the risk of TIM violating tax regulations as a result of significant conduct carried out by third parties, of which it has become aware.

The relevant conduct to be reported concerns actions or omissions committed by Third Parties which, by leading to an untrue or fraudulent representation of the facts, may mislead the Company with regard to the application of relevant tax laws.

### [207-2 c]

The TIM Group's tax information to be included in financial reports is prepared by the Tax Department of TIM SpA, which certifies its correctness and completeness. There is no ad hoc external

## ETHICS AND CORPORATE GOVERNANCE

assurance report, but the data are reviewed in the broader-ranging audit of the Consolidated Financial Statements conducted by EY.

### [207-3 a]

The TIM Group, in compliance with the principle of "Corporate Responsibility", acts according to the values of honesty and integrity in the management of the tax variable, protecting the interests of all stakeholders, in the knowledge that tax revenues are one of the main sources of contribution to the economic and social development of the countries in which it operates.

With a view to establishing relations with the tax authorities on the principle of collaboration and good faith, TIM has voluntarily adhered to the Cooperative Compliance Regime (better known internationally as Cooperative Compliance), with effect from the 2017 tax period. This regime involves a new way of interacting with the Tax Administration, aimed at reducing the degree of uncertainty in the management of tax issues and preventing the risk of tax disputes.

In this regard, TIM, in particular, undertakes to:

- communicate in a clear and transparent manner to the Revenue Agency any changes in tax strategy, in medium and long-term tax planning and possible risks associated with the most significant transactions;
- provide correct, accurate and timely information and respond promptly to questions and requests for information received from the Revenue Agency;
- promptly resolve any uncertain tax positions before the submission of tax returns, and, if discrepancies subsequently emerge, define an agreement with the Revenue Agency for the

resolution of the same.

With reference to Brazil, on the other hand, the TIM Group has locally adhered to a Cooperative Compliance program developed by the State of São Paulo (so-called "Nos Conformes"). In addition, the TIM Group, together with some other major contributors in Brazil, has joined a project (the "Confia Program") for the future introduction of a Cooperative Compliance program also in the area of federal taxation.

In addition, TIM adheres to the provisions on transfer pricing documentation in accordance with indications in OECD Guidelines, based on the so-called "three-tiered approach", consisting of Master Files, Country Files and Country-by-Country Reports.

TIM acts in a transparent and collaborative manner with all Italian and European institutions and trade associations to support the development of effective systems in the countries in which it operates. In particular, some TIM representatives actively participate in the Tax Policy activities carried out by Italian and EU trade associations and business associations, both in general business contexts and in industry-specific areas; the same activity is also carried out by the TIM Group in Brazil, with reference to local operations.

In particular, relations with the Brazilian tax authorities are based on the highest ethical standards, transparency and cooperation, always responding to the needs of the tax authorities in the shortest possible time, through correct and precise information. In relation to the general approach, TIM S.A. tries, where possible, to resolve any doubts before submitting additional tax returns and meeting further obligations and, in the event of problems subsequently identified, tries to align the documents with the terms and conditions established by the tax administration.

## ETHICS AND CORPORATE GOVERNANCE

### [207-4 ]

The amount of the main financial, economic and tax indicators for the jurisdictions in which the TIM Group operates is indicated in the attachment. It should be noted that these indicators refer to the

2022 financial year, and are those reported "country by country" as provided for by Article 1, paragraphs 145 and 146 of Law no. 208 of 28/12/2015, presented by the TIM Group in 2023.

## ETHICS AND CORPORATE GOVERNANCE

## [GRI 207-4]

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intragroup transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Argentina	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	7	7,409	0	-272	7,012	3,461	0	-18	70
Austria	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	1	0	1,689	88	394	2,735	395	31	23
Belgium	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	1	872	81	244	2,200	394	32	19
Brazil	Landline and mobile phone services.	9,793	4,273,888	163,913	294,460	2,176,896	4,498,654	445,881	57 The amount indicated is determined net of the offsetting against withholding taxes incurred and credits for taxes other than income taxes, for a total amount equal to €/000 37,308	32,911
Bulgaria	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	0	966	19	985	51	55	-1	0
Chile	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	1	3,848	0	-680	5,220	9,712	0	2	0

## ETHICS AND CORPORATE GOVERNANCE

### [GRI 207-4]

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intragroup transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Colombia	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	157	1,865	177	1,775	3,590	0	97	103
France	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	21	728	15,313	836	6,631	18,295	582	223	223
Germany	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	6	21	11,418	235	9,548	25,625	10,983	268	221
Greece	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	33	11,172	5,370	-477	25,808	369	11,255	0	34
Israel	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	14	22	4,589	4,230	5,924	1,936	25,115	215	51
Italy	"In Italy, the TIM Group operates throughout the supply chain of advanced communication services, including: fixed, mobile and Internet telecommunications, multimedia and television, products and services for Information Technology and research and development. In addition, Italy exercises coordination over subsidiaries - direct and indirect and non-resident."	40,752	12,688,778	5,065,900	-813,205	11,777,910	11,917,617	583,241	-181,545	35,673

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### [GRI 207-4]

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intragroup transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Luxembourg	Financial and subholding activities	13	1,657,258	198,775	-34,884	15	1,821,028	241,735	14,852	24,061
Malta	Provision of administrative, management and support services; sale of IT solutions.	0	565	0	-111	4	2	0	0	0
Nigeria	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	567	0	-43	230	31	0	1	3
Netherlands	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	1	123	3,895	175	3,845	18	4,785	35	26
Panama	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	7	1,153	1,209	-1,170	12,425	4,057	0	-109	0
Peru	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	1	3,827	423	-761	2,820	17,176	0	-59	0
Puerto Rico	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	641	1,702	36	3,799	2,860	304	4	0
United Kingdom of Great Britain and Northern Ireland	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	8	585	8,932	89	9,343	11,082	-4,611	76	112

## ETHICS AND CORPORATE GOVERNANCE

### [GRI 207-4]

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intragroup transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Czech Republic	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	1	112	-4	6	279	0	-6	0
Republic of San Marino	Landline and mobile phone services	39	10,120	1,022	1,872	1,341	1,886	1,607	273	310
Romania	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	2	146	260	20	15	611	0	4	4
Russia	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	4	92	370	25	40	109	65	0	5
Singapore	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	12	29,830	8,036	555	548	4,801	0	0	0
Slovakia	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	0	175	72	0	305	0	15	16
Spain	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	3	18	1,345	88	177	1,687	597	0	0

## ETHICS AND CORPORATE GOVERNANCE

## [GRI 207-4]

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intragroup transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
United States of America	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	39	152,399	57,186	2,885	34,140	14,588	42,731	353	725
Switzerland	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services; sale of IT solutions.	0	495	696	-145	272	1,377	575	23	11
Turkey	Provision of administrative services, support in the technical management of equipment related to the local network and management of relations with local customers for the provision of international telecommunications services.	24	18,229	480	-2,213	10,415	16,830	0	0	0
Venezuela	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	76	296	-554	52	444	0	3	0
Virgin Islands US	Provision of administrative services and support in the technical management of equipment related to the local network, for the provision of international telecommunications services.	0	8	1,414	72	1,768	1	5,568	8	7

wwNote: the scope of the information and the data reported refer to "country by country" reporting for the 2022 tax period. Companies resident in Argentina: TI Sparkle Argentina S.A.; companies resident in Austria: TI Sparkle Austria GmbH; companies resident in Belgium: TI Sparkle Belgium S.P.R.L. - B.V.B.A.; companies resident in Brazil: I-Systems S.A., TI Latam Participacoes e Gestao Administrativa LTD, TI Sparkle Brasil Participacoes LTDA, TI Sparkle Brasil Telecomunicacoes LTDA, TIAudit Compliance Latam S.A., TIM Brasil Servicos e Participacoes, TIM S.A., Cozani RJ Infraestrutura e Rede De Telecomunicacoes S.A.; companies resident in Bulgaria: TI Sparkle Bulgaria EOOD; companies resident in Chile: TI Sparkle Chile SPA; companies resident in Colombia: TI Sparkle Colombia LTDA; companies resident in France: Noovle France SASU, TI Sparkle France SAS; companies resident in Germany: Olivetti Deutschland GmbH, TI Sparkle Germany GmbH; companies resident in Greece: TI Sparkle Greece S.A.; companies resident in Israel: MED 1 Submarine Cables LTD, TI Sparkle Israel LTD; companies resident in Italy: Telecom Italia S.p.A. (anche TIM S.p.A.), CD Fiber S.r.l., Daphne 3 S.p.A., Fibercop S.p.A., Global Space Tre S.r.l., Noovle AI S.r.l., Noovle S.p.A. società benefit, Noovle Sicilia - società consortile a r.l., Olivetti Payment Solutions S.p.A., Olivetti S.p.A. società benefit, Staer Sistemi S.r.l., Telecom Italia Sparkle S.p.A., Telecom Italia Trust Technologies S.r.l., Telecom Italia Ventures S.r.l., Telecontact Center S.p.A., Telenergia S.r.l., Telsy Elettronica e Telecomunicazioni S.p.A., Tiesse S.C.P.A., TIM My Broker S.r.l., TIM Retail S.r.l., TIM Servizi Digitali S.p.A., Mindicity S.r.l. società benefit; companies resident in Luxembourg: Telecom Italia Capital S.A., Telecom Italia Finance S.A.; companies resident in Malta: Noovle Malta LTD; companies resident in Nigeria: TIS Lagos Limited; companies resident in the Netherlands: TI Sparkle Netherlands B.V.; companies resident in Panama: Panama Digital Gateway S.A., TI Sparkle Panama S.A.; companies resident in Peru: TI Sparkle Peru S.A.; companies resident in Puerto Rico: TI Sparkle Puerto Rico LLC; companies resident in the United Kingdom of Great Britain and Northern Ireland: Olivetti UK LTD, TI Sparkle UK LTD; companies resident in Romania: TI Sparkle Romania SRL; companies resident in Russia: TI Sparkle Russia LLC; companies resident in the Czech Republic: TI Sparkle Czech S.R.O. V Likidaci; companies resident in the Republic of San Marino: Telecom Italia San Marino S.p.A., Telefonía Mobile Sammarinese S.p.A.; companies resident in Singapore: TI Sparkle Singapore PTE/LTD; companies resident in Slovakia: Noovle Slovakia S.R.O., TI Sparkle Slovakia S.R.O.; companies resident in Spain: TI Sparkle Spain Telecommunications S.L.; companies resident in the United States of America: TI Sparkle Americas Inc., TI Sparkle North America Inc.; companies resident in Switzerland: Noovle International SAGL, TI Sparkle Switzerland GmbH; companies resident in Turkey: TI Sparkle Turkey Telekomunikasyon Hizmetleri Anonim Sirketi; companies resident in Venezuela: TI Sparkle Venezuela C.A.; companies resident in Virgin Islands US: TI Sparkle St. Croix LLC.

## ETHICS AND CORPORATE GOVERNANCE

### [415-1]

The Code of Ethics and Conduct explicitly prohibits direct or indirect disbursements, contributions, benefits or other benefits to political parties or movements and workers' trade unions, or to their representatives or candidates.

In Brazil, as indicated in the Code of Ethics and Conduct of TIM S.A., TIM does not provide, directly or indirectly, contributions or other benefits to politicians, political candidates, political parties or movements and/or workers' trade unions, or to their representatives or candidates, in compliance with applicable regulations.

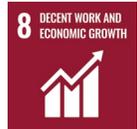
# MANAGEMENT OF MATERIAL TOPICS

## SUSTAINABLE SUPPLY CHAIN

### POSITIVE IMPACT - ACTUAL

#### [3-3 a, b]

Companies that select their suppliers based on business relevance and the sustainability dimension stimulate innovation and steer the market towards solutions and products with a low environmental and social impact. Furthermore, companies that use local resources encourage the economic and social growth of the area.



#### POLICIES AND COMMITMENTS

#### [3-3 c]

- Product and Service Purchasing Policy
- Selection of suppliers considering ESG impacts and consistently with TIM Group Code of Ethics
- Encourages research into innovative technology solutions and promotes best practices in the vendor rating process
- Founding member of JAC (Joint Audit Cooperation)

#### KPI

#### [3-3 e]

- Scope 3 - indirect emissions generated by the supply chain as part of the purchase of products and services (GHG Protocol category 1) and capital goods (GHG Protocol category 2)
- % of local suppliers out of the total
- No. of audits conducted on suppliers
- % of qualified suppliers with ESG criteria
- % of suppliers endorsing the group's Code of Ethics
- 

#### PLAN TARGETS

#### [3-3 e]

- -47% scope 3 emissions to 2030 (categories 1, 2 and 11 GHG Protocol - 2019 baseline)
- In Brazil, 85% of suppliers assessed through an integrity due diligence process

#### PROGRESS VS. TARGET

#### [3-3 e]

##### Group

- 1,852,469 tCO2 eq. Scope 3<sup>(1)</sup> emissions attributable to the supply chain (GHG Protocol categories 1 and 2)
- + 53% (vs. 2022) the number of audits conducted within the JAC project

##### Domestic

- 94% (+1% vs. 2022) of the total order made locally
- 100% of new suppliers assessed according to environmental criteria
- 100% of new suppliers have signed the principles set out in the Group's Code of Ethics and Conduct

##### Brazil

- 99% ( in line with. 2022) of the total order made locally

*(1) Significant effort was made in 2023 to improve the calculation methodology for Scope 3*

#### ACTIONS

#### [3-3 d, e]

- In the Domestic BU continuous improvement in qualification and vendor rating processes to ensure the sustainability of the supply chain
- Integration of sustainability issues, as integral part of the evaluation criteria, within tender documents
- Sustainability audit of the supply chain and proposal of corrective actions within the Joint Audit Cooperation<sup>(1)</sup>
- Monitoring of sustainability risks and impacts of purchased products and services
- Collaborating with suppliers/partners to reduce the risk of security incidents
- Promoting fair and non-discriminatory labour practices among suppliers
- Working with suppliers to develop a proactive approach to sustainability issues and provide sustainable solutions
- In Brazil Supply Chain Engagement by Implementing the CDP Supply Chain Programme for Scope 3 Emissions Analysis

*(1) JAC is a collective of telecommunications companies that aim to promote safe and fair working conditions, as well as responsible business, social and environmental management.*

## SUSTAINABLE SUPPLY CHAIN

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

*TIM Group recognises the importance of a cooperative relationship with its suppliers and partners. In particular, in line with the Group's values, TIM requires its suppliers and promotes, through the latter, compliance with the principles and relevant legal requirements, also in the countries where these stakeholders operate.*

### COLLABORATIONS

#### [3-3 f]

- Monitoring processes for suppliers also through external bodies, such as Joint Audit Cooperation<sup>(1)</sup> initiative JAC of which TIM is a founding member
- Value Partner of the Open- es Alliance, which through a platform and an ESG evaluation system based on international standards, provides analysis tools to create a sustainable development ecosystem
- In Brazil, supplier evaluation processes through databases such as Business Pact for Integrity and Against Corruption and the Brazilian National Pact for the Eradication of Slave labour

(1) JAC is a collective of telecommunications companies that aim to promote safe and fair working conditions, as well as responsible business, social and environmental management

### Correlation of ESG Material Topics - Enterprise Risk Management

ESG Theme	Risk Areas	ERM Relevance Level
Sustainable supply chain	Supply Chain	High

#### Risk calculation methodology

- Methodology: Economic-financial valuation methodology using financial statements analysis and the Monte Carlo Model.
- Variables: Supplier financial data, supplier production capacity ratio, inflationary context trend, constraints deriving from the implementation of the National Recovery and Resilience Plan calls for tender (construction times, penalties, batch construction requirements).

#### Activities performed

- Integration with Network Operations and Procurement processes in order to identify the basic, financial data and constraints necessary for the assessment as well as to monitor the impacts on the risk of operational developments.
- A model implemented for evaluating the economic-financial risk of network providers both with a backward-looking (financial analysis) and forward-looking (probabilistic model of the impact of exogenous/endogenous factors) view.
- The supplier evaluation system was strengthened, in light of the integration of the Open-ES platform, for a greater sustainability of the supply chain (value chain).

## SUSTAINABLE SUPPLY CHAIN

### [204-1 a,b,c]

With reference to the Domestic BU perimeter<sup>(1)</sup> (excluding Intragroup, energy and delegated purchases), in 2023 total orders were placed with 2,456 suppliers, of which 2,195 have production units in Italy and represent 94% of total orders.

In particular, of the 2,456 suppliers, 89% are Italian companies and the remaining 11% are companies belonging to multinationals that have carried out their activities through companies under Italian law.

In the Domestic BU, "local" refers to suppliers with production units in Italy.

In the Brazil BU, products come from local suppliers as far as possible. The number of local Brazilian suppliers is 8,785, accounting for 99% of all suppliers in the Brazil BU.

In the Brazil BU, suppliers with production units in Brazil are considered local.

The main geographical areas in which the TIM Group operates are Italy and Brazil.

### [308-1 a 414-1 a]

The selection of the Group's suppliers takes place through pre-contractual qualification, aimed at assessing their economic-financial and technical-organizational characteristics. If the result of this assessment - which also includes checks on compliance with environmental and social issues - is positive, the suppliers

are registered in the Group's supplier master data. In 2023, 100% of newly qualified suppliers undertook in writing in their own name and on behalf of any authorized subcontractors, collaborators and employees, to comply with the principles of conduct of the Group's Code of Ethics and Conduct.

In 2023, 680 new suppliers were qualified (632 in 2022), 100% of which were assessed for social and environmental issues.

Also in the Brazil BU, TIM's socio-environmental qualification process aims to mitigate the risks associated with the activities considered critical carried out by its suppliers. The assessment is part of the process of hiring new suppliers and also makes it possible to verify the qualification criteria of suppliers who already have a relationship with the company. Through this assessment, the social, environmental, health and safety aspects related to the activities carried out by all contractors responsible for activities considered critical are identified and verified.

During 2023, based on the qualification process, 328 suppliers considered critical, equivalent to 28% of 1,182 new suppliers, were assessed for social and environmental issues, of which 126 (potential) suppliers are still in evaluation process, 182 have been qualified to provide services, being classified as low or medium socio-environmental risk, and 20 suppliers have not reached the minimum score, thus preventing the qualification process from continuing.

<sup>(1)</sup> the data relating to the supply chain in the Domestic BU area refer to the following companies: Telecontact Center S.p.A. - Olivetti S.p.A. - TI Sparkle S.p.A. - TI Trust Technol. S.r.l. - TI Ventures S.r.l. - FIBERCOP S.p.A. - TIM MY BROKER S.R.L. - TIM SERVIZI DIGITALI SpA - Telecom Italia S.p.A. Noovle Spa Società Benefit - TI SPARKLE GERMANY GMBH - TI SPARKLE NETHERLANDS BV - TI SPARKLE

## SUSTAINABLE SUPPLY CHAIN

### [308-2 a,b,c,d,e 414-2 a,b,c,d,e]

In the Domestic BU, during 2023, the process that defines the activities aimed at improving the sustainability of the supply chain continued. These activities involve the qualification and vendor rating phases. A matrix was created that made it possible to divide the purchasing markets into four classes, identifying those that are critical from the point of view of sustainability and economic impact.

Suppliers subject to sustainability audits carried out under the JAC (Joint Audit Cooperation) initiative<sup>(1)</sup> are chosen from those belonging to the highest risk classes. These audits are conducted by independent companies specialized in the sector and are repeated periodically to monitor the implementation of any corrective actions and, in the event of a positive outcome, to verify the maintenance of the level of performance found over time.

Where the JAC audit detects non-conformities to the required standard, a CAP (Corrective Action Plan) is defined, which commits the supplier to resolve the non-conformities within the deadlines set out in the CAP.

During 2023, the JAC project resulted in 150 audits. During these audits, a total of 890 non-conformities were detected.

In addition to the JAC project, since 2022, TIM has been a Value Chain Partner of the Open-es project. As part of this initiative, all active suppliers were asked to register on this platform where the above criteria are evaluated with a scoring given, based on a questionnaire of 114 questions.

At the end of 2023, 1,022 TIM suppliers had completed the ESG questionnaire on the Open-es platform (921 in 2022). The details of

the environmental and social impacts have not yet been processed. For more information, please visit the Open-es website: <https://www.openes.io/it>.

In Brazil, in 2023, there were 20 suppliers who did not pass the qualification phase of the process. As these suppliers were discarded from the engagement process, there was no need to implement corrective plans.

In relation to the number of critical suppliers hired in 2023, the percentage of suppliers associated with potential environmental risks was 4.2%, while the percentage of suppliers associated with potential social risks was 22.9%.

During 2023, it was not necessary to terminate any business relationship with suppliers following the assessment of significant negative environmental impacts – actual and potential – identified through the company's assessment and control processes. It should also be noted that the non-conformities identified in the supplier audit process, mainly in the areas of health and safety and the environment, have not been considered critical and are duly addressed by suppliers, in accordance with the action plan agreed between the parties.

In addition to the second part audit project mentioned above, with the aim of evaluating suppliers with active contracts considered critical from a socio-environmental point of view, a diagnostic project was carried out to assess the environmental performance of renewable energy plants, on a sampling basis, considering the relevance of this area of service for TIM's environmental strategy.

<sup>(1)</sup>The Joint Audit Cooperation (<https://jac-initiative.com/>) came into being based on a memorandum of understanding signed in late 2009 by TIM, Orange and Deutsche Telekom. In the years that followed, the initiative expanded significantly, and by the end of 2023, 27 telephone operators from all over the world were part of the association

## SUSTAINABLE SUPPLY CHAIN

### [407-1 ai, aii, b]

Suppliers operating in the following geographical areas are considered at greater social risk: Asia, Central and South America, North Africa and Eastern Europe.

Based on specific provisions in the "Product and Service Purchasing Policy", and in line with the Group's values, TIM requires its suppliers (and promotes, through them) respect for freedom of association and the right to collective bargaining.

More details can be found in the GRI 2-23 and 2-24 indicators. The actions that TIM implements to control suppliers vary depending on the riskiness of the supplier and the amount of the purchase. If any controls and/or audits identify negative outcomes, appropriate corrective measures will be taken in accordance with the provisions of the contracts, to ensure that the sustainability requirements in the guidelines are met.

### EMPLOYEES OF THE TIM GROUP

Within the applicable scope, the activities carried out by employees do not limit freedom of association or the rights and prerogatives provided for by law and by the contract regarding trade union rights. Collective bargaining is applied to all employees within the scope of the Domestic BU.

In Brazil, TIM S.A. guarantees its employees the full right to freedom of association and collective bargaining (through trade unions). All these rights are guaranteed by a collective agreement. TIM Brazil's collective agreements cover 100% of employees.

For the Domestic BU, TIM's industrial relations model is aimed at consolidating the preventive stages of information and trade union discussion, including through specific company bodies

(commissions), tasked with gaining further technical insights into specific areas, such as training, health and safety in the workplace, welfare and equal opportunities.

At a local level, Unitary Trade Union Representatives (RSU) are present throughout all Italian regions, to encourage adequate participation in grass-roots discussion. Some 390 people act as RSL at TIM Spa. In addition to the protections and rights afforded by law and the collective agreement, TIM recognizes specific prerogatives for the trade union representatives in the Company.

At the request of workers, the employer, in compliance with provisions of law and the contract, withholds the membership fee for the trade union organization chosen by the worker from their pay packet.

The percentage of BU Domestic workers who are members of the union is 39% (approximately 14,000 employees).

### [408-1 ai, aii, bi, bii, c]

As regards child labor, suppliers operating in the geographical areas of Asia, Central and South America, North Africa and Eastern Europe are considered to be at greater social risk

The "Product and Service Purchasing Policy" states that no support is used or provided in any way for the employment of people under 18 years of age, except for different legal limits set in individual countries and in any case, in compliance with European policies on the subject.

In any case, children under the age of 18 must not be employed in hazardous work or at night.

## SUSTAINABLE SUPPLY CHAIN

If any controls and/or audits have negative outcomes, appropriate corrective measures will be taken according to the provisions of contracts, in order to ensure that the sustainability requirements in the guidelines are met.

At TIM S.A., activities are carried out on the basis of the "Supplier Relations Policy", which establishes the commitments to undertake in order to prevent risks related to child labor in the supply chain and commercial partnerships. The policy regulates key points such as fair competition, quality, safety, human rights and social and environmental responsibility. Contracts also require companies to adhere to the Code of Business Ethics and the principles of the United Nations Global Compact, and also specifically repudiate child labor. Suppliers are also evaluated according to Brazilian labor laws by consulting the databases of the Business Pact for Integrity and Against Corruption and the Brazilian National Pact for the Elimination of Forced Labor. In the event of ascertained incidents of non-compliance with labor laws, the supplier will no more be able to provide services or products to the Company. TIM doesn't hire suppliers with risk of occurrence of child labor.

### EMPLOYEES OF THE TIM GROUP

Within the Domestic BU, there are no activities at risk of episodes of child labor.

In Brazil, TIM S.A. does not identify this type of risk for employees. Collaboration with workers' representatives, together with internal procedures and control systems, has meant that no violations or risks have been reported regarding the adoption of the Group's Social Responsibility policies that protect fundamental labor rights, such as the prohibition of forced labor or child labor.

### [409-1 ai,aii,b]

As regards forced or compulsory labor, suppliers operating in the geographical areas of Asia, Central and South America, North Africa and Eastern Europe are considered to be at greater social risk.

The "Product and Service Purchase Policy" prohibits any form of involuntary work or service, obtained under the threat of any penalty or as a form of extinguishing a debt; workers may not be requested to leave any deposit at the start of the employment relationship, or sign blank documentation waiving their rights prior to their exercise or lawful waiver of their exercise.

If any controls and/or audits identify negative outcomes, appropriate corrective measures will be taken in accordance with the provisions of the contracts, to ensure that the sustainability requirements in the guidelines are met.

At TIM S.A., activities are carried out on the basis of the "Supplier Relations Policy", which establishes the commitments to be taken into account in order to prevent risks related to child labor in the supply chain and commercial partnerships. The policy regulates key points such as fair competition, quality, safety, human rights and social and environmental responsibility. Contracts also require companies to adhere to the Code of Business Ethics and the principles of the United Nations Global Compact, and also specifically repudiate forced or compulsory labor. Suppliers are also evaluated according to Brazilian labor laws by consulting the databases of the Business Pact for Integrity and Against Corruption and the Brazilian National Pact for the Elimination of Forced Labor. In the event of ascertained incidents of non-compliance with labor laws, the supplier will not be able to provide services or products to the Company. TIM doesn't hire suppliers with risk of occurrence of forced labor.

## SUSTAINABLE SUPPLY CHAIN

### EMPLOYEES OF THE TIM GROUP

In the Domestic BU, no activity is at risk of episodes of forced labor. Tim operates in full compliance with applicable legislation in all countries where it is active, undertaking to prevent any human rights violations related to its activities, according to UN guidelines; in this regard, the Company has adopted a specific policy on Human Rights.

In Brazil, TIM S.A. does not identify this type of risk for employees.

For more information on personnel in the supply chain, please see the chapter "Worker Health and Safety".

# MANAGEMENT OF MATERIAL TOPICS

## DEFENSE OF HUMAN RIGHTS | DISCRIMINATION AS REQUIRED BY D.LGS 254/2016

### [3-3 a, b]

Companies may directly or indirectly commit human rights' violations such as discrimination on the basis of religion, age, sex, sexual orientation or gender identity, political opinion, ethnicity, language, disability or failure to ensure fair wages, minimum age for entry into the world of work, working conditions, accessibility to people with disabilities, maternity defense, prohibition of harassment and forced/compulsory/bonded labour. TIM Group could contribute to the negative impacts both directly, through its own activities, but above all indirectly along the entire value chain, with particular reference to the supply chain which includes, among main business relationships, relations with companies operating in the manufacturing, services and content production sectors.

### POLICIES AND COMMITMENTS

#### [3-3 c]

- The Code of Ethics prohibits any form of discrimination or harassment
- The Human Resources Policy condemns all forms of discrimination, harassment and mobbing
- The Human Rights Policy with a commitment to be a promoter of equal rights and a proactive leader
- The Policy to manage incidents of gender and sexual harassment and bullying
- The Recruitment and Selection Policy
- Signatory of the United Nations Global Compact in 2002

### KPI

#### [3-3 e]

- No. of complaints received and handled through the whistleblowing channel
- No. of complaints received and handled regarding discrimination, at Group level
- Number of new suppliers who endorse the principles of conduct contained in the Group's Code of Ethics and Conduct

### PLAN TARGETS

#### [3-3 e]

- Eliminating, controlling and dealing with discrimination complaints

### PROGRESS VS TARGET

#### [3-3 e]

##### Group

- No. of complaints received and handled regarding the whistleblowing channel substantially in line with 2022
- No. of complaints received and handled regarding minor discrimination slightly higher than 2022
- in 2023, 100% of newly qualified suppliers in Italy committed to complying with the Group's Code of Ethics and Conduct.

## DEFENSE OF HUMAN RIGHTS | DISCRIMINATION AS REQUIRED BY D.LGS 254/2016

### CERTIFICATIONS AND PROCESSES

#### [3-3 c, e]

- Periodic internal process to assess own activities in relation to possible impacts on human rights both in Italy and abroad. These rights also concern third parties who enter into business relationships with TIM and consider rights to access telecommunications services, to innovation, privacy and IT security against all forms of discrimination and the defense of the weakest individuals, such as minors.
- TIM has adopted a process for monitoring reports from both internal and external sources (Whistleblowing)

### COLLABORATIONS

#### [3-3 f]

- With collaboration of an external partner, who is an expert in accessibility, TIM carried out a usability assessment on all the platforms and apps used by employees to capture the accessibility gap and prepare an adaptation plan.
- Active participation in the local networks of Global Compact Italy and Brazil and in the Joint Audit Cooperation (JAC), a specific initiative of the ICT sector that aims to raise human rights standards along the supply chain.
- In Brazil membership to the Coalizão Empresarial Pelo Fim da Violência Contra Mulheres e Meninas, an important business movement that fights against gender-based violence.

### ACTIONS

#### [3-3 d, e]

##### Group

- Adoption of a body of regulations to support the issue, updated and integrated over the years
- Adoption of reporting processes with respect to possible violations (Whistleblowing)
- Person of Trust: a professional outside the Company to whom you can turn for opinions on events that have occurred
- Legal Advice Service: provided by lawyers and/or experts outside the Company to whom the victim employee can turn
- Psychological Helpdesk for TIM's Citizens
- Provision of tools and measures to ensure safe and non-discriminatory working environments
- Diversity & inclusion manager and numerous inclusion initiatives
- Age Empowerment Programme
- Disability Management and numerous projects such as 'No one excluded'
- Training and communication on human rights that aims to broaden knowledge of human rights
- Usability assessment of all platforms and apps used by employees
- Promotion of non-discriminatory practices in the supply chain

##### Brazil

- In 2023, TIM S.A. continued the human rights due diligence process, which began in 2022, with the engagement of external experts, on the basis of which improvement actions are consolidated
- TIM Brazil implemented the "Respeito Gera Respeito" (Respect Generates Respect) programme which aims, through training courses, to combat all forms of violence, bullying and all types of harassment

## DEFENSE OF HUMAN RIGHTS | DISCRIMINATION AS REQUIRED BY D.LGS 254/2016

### [GRI 406-1a] Group

Number of complaints received through the whistleblowing channel	2023	2022	2021
Total number of complaints IT	16	8	5
Number of substantiated complaints IT	7	1	1
Total number of complaints BR	66	61	59
Number of substantiated complaints BR	12	22	20

### [GRI 406-1b] BU Domestic

Complaints received and handled regarding discrimination in Italy	2023	2022	2021
Total number of complaints about discrimination received through the whistleblowing mechanism in Italy	11	2	2
Total number of complaints regarding discrimination received through the whistleblowing mechanism of which substantiated in Italy	5	1	1
Number of complaints handled regarding discrimination during the reporting period in Italy	13	2	2
Number of complaints handled regarding discrimination during the reporting period of which substantiated in Italy	6	1	1
Number of resolved complaints regarding discrimination during the reporting period in Italy	8	2	1
Number of complaints resolved regarding discrimination during the reporting period of which substantiated in Italy	5	1	1
Total number of complaints received before the survey period and resolved in the reporting period in Italy	2	1	0
Total number of complaints received before the survey period and resolved in the reporting period of which substantiated in Italy	1	0	0

## DEFENSE OF HUMAN RIGHTS | DISCRIMINATION

### [GRI 406-1b] BU Brasile

Complaints received and handled regarding discrimination in Brazil	2023	2022	2021
Total number of complaints about discrimination received through the whistleblowing mechanism in Brazil	15	13	14
Total number of complaints regarding discrimination received through the whistleblowing mechanism of which substantiated in Brazil	3	5	1
Number of complaints handled regarding discrimination during the reporting period in Brazil	15	13	14
Number of complaints handled regarding discrimination during the reporting period of which substantiated in Brazil	3	5	1
Number of resolved complaints regarding discrimination during the reporting period in Brazil	15	12	8
Number of complaints resolved regarding discrimination during the reporting period of which substantiated in Brazil	3	5	1
Total number of complaints received before the survey period and resolved in the reporting period in Brazil	1	6	0
Total number of complaints received before the survey period and resolved in the reporting period of which substantiated in Brazil	0	1	0

### [406-1b]

During 2023, the Audit Department of TIM S.p.A. handled sixteen reports concerning Human Rights (twelve received in 2023 and four in 2022), thirteen of which were attributable to aspects of discrimination.

Of the thirteen mentioned above, ten were resolved in 2023 (eight received in 2023 and two in 2022), of which six were substantiated (five received in 2023 and one in 2022).

For all substantiated reports, for which discriminatory behavior was confirmed, the following actions were

- awareness-raising interviews and webinars;

- warning letters or disciplinary measures addressed to the parties involved (internal and/or external). In addition, a mandatory e-learning training module on inclusive behavior (“TIM against gender and sexual harassment and bullying”) was set up.

The action plans were implemented by the Human Resources Department or by the competent functions involved.

The new whistleblowing procedure (issued on 22 June 2023) applies to TIM and its subsidiaries, which guarantee the procedure is properly adopted at all times, and disseminated internally and externally as

## DEFENSE OF HUMAN RIGHTS | DISCRIMINATION

far as possible, respecting the autonomy and independence of each company. The document is also a reference for other subsidiaries of the TIM Group not covered by the boundary of application. The term subsidiaries means the subsidiaries of the TIM Group, excluding listed and foreign companies, to which this procedure directly applies.

During 2023, the following companies adopted the new whistleblowing procedure: TIM S.p.A, TIM Ventures, TIM Retail, TI Sparkle, Olivetti, Telecontact Center, Telenergia, Telsy, TI Trust Technologies, Fondazione TIM, Noovle, FiberCop, Staer Sistemi, TIM my broker, TS Way.

Of the fifteen complaints of discrimination received by the Brazil BU, through the whistleblowing channel:

- seven concerned LGBT+phobia;
- six racial aspects;
- one LGBT+ phobia and age;
- one misogyny.

From an analysis of the fifteen complaints, the following emerged:

- six inconclusive;
- four unfounded;
- three substantiated;
- two without elements for analysis.

A complaint of discrimination received in 2022 was dismissed in 2023 as unfounded.

For the three substantiated complaints, the following actions were taken:

- (i) a change of sector and a written warning;
- (ii) the victim (employee) received social and legal assistance guaranteed by ACT (Collective Agreement);
- (iii) employee taken on board by the PC&O department, which will continue by monitoring the Social Service. The Manager transferred the employee from direct service with the partner involved. Notification/notice to the partner.

# LINKAGE LEGISLATIVE DECREE 254/2016

SCOPE Legislative Decree 254/2016	MATERIAL TOPIC 2023
<b>Environment</b>	Use of renewable energy sources Sustainable supply chain Climate change
<b>Social</b>	Privacy and cybersecurity Digital transformation and inclusion Customer interaction and transparency of services Emerging infrastructures and technologies
<b>Staff</b>	Equal pay and opportunities at TIM
<b>Respect for human rights</b>	Scope reported, even if not included in material topics
<b>Fighting corruption</b>	Ethics and corporate governance

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<b>Statement of use</b>	TIM S.p.A. has reported in accordance with the GRI Standards for the period from January 1st 2023 to December 31st 2023				
<b>GRI 1 used</b>	GRI 1: Foundation 2021				
<b>Applicable GRI Sector Standard(s)</b>	N/A				
<b>GRI Standard/Other source</b>	<b>Disclosure</b>	<b>Omission</b>			
		<b>Location</b>	<b>Requirement(s) omitted</b>	<b>Reason</b>	<b>Explanation</b>
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# TIM

## EU Taxonomy Disclosure

(pursuant to Regulation (EU) 2020/852 of 20 June 2020 and Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021)

The European Taxonomy is a classification system introduced as part of the European Green Deal as an enabling tool to achieve the environmental and climate objectives of the Pact, in particular decarbonization by 2050. By means of precise indications on economic activities that can be classified as eco-sustainable (provided through specific Delegated Acts), the Regulation intends to address the issue of transparency for investors, counter the phenomenon of so-called 'greenwashing', while supporting corporate organizations in the process of energy transition and the adoption of sustainable environmental policies.

TIM S.p.A. and all fully consolidated Group companies come under the scope of the regulation.

### European Taxonomy in the TIM Group

Sustainability is an integral part of TIM's business and investment strategies, which is reflected in the design and development of network infrastructure and data centers, as well as in the implementation of services aimed at rationalizing the use of resources. The connectivity solutions and innovative services that TIM offers its customers are strongly oriented towards achieving the environmental objectives set out by European legislation.

The EU Taxonomy does not currently provide criteria for including network infrastructures as activities compatible with legislation. For TIM, and for TLC companies in general, the main business area is therefore still excluded from final data, though its role as a carrier of innovative technologies that can be considered as an enabling tool for achieving the most ambitious environmental protection objectives.

### The activity reporting process

Based on indications in the Delegated Act on climate change objectives and the indications in the Delegated Acts of the new 4 environmental objectives (published in June 2023), a two-step process was implemented, which involved reviewing the scope of applicability of the Taxonomy by screening the new activities contemplated in the recent environmental objectives. These activities were assessed for their potential applicability to the context of the TIM Group. In parallel, specific analyses were conducted on eligible assets mapped in the 2022 financial year, in order to assess possible updates to increase the alignment percentage. The main change made during this reporting year, in terms of extending the scope, was the inclusion of TIM Brazil. With regard to the alignment analysis, an update on the first two objectives was conducted in 2023, while for the four new objectives, only an eligibility analysis was carried out in accordance with regulatory provisions. In 2023, the identified activities refer to the following Group entities:

- TIM S.p.A.
- Gruppo TI Sparkle
- Noovle S.p.A.
- Gruppo Olivetti
- TIM Brasil S.A.

The following table summarizes the main business categories included in the TIM Group's scope of eligibility. The activities were divided between core-business and non-core-business activities. As in the previous year, with the aim of adopting a more cautious approach, the TIM Group decided to proceed with a detailed and in-depth analysis of core-business activities only.

# European Taxonomy

## Scope of eligibility

Economic activities (Core-Business)	Description of the TIM Group's activities in the scope	Objective	Company
8.1 Data processing, hosting and related activities <sup>(1)</sup>	<p>This category includes activities performed by Data Centers owned by the TIM Group, mainly relating to housing and hosting services of IT facilities for storage and processing. This activity can be carried out in the following ways:</p> <ul style="list-style-type: none"> <li>- through the use of devices and infrastructure owned by the TIM Group</li> <li>- through the involvement of a third party to provide the service (through sub-contracting agreements);</li> <li>- through cloud providers involving devices and infrastructures not owned by the TIM Group that enable the use of cloud technology.</li> </ul> <p>Regardless of the different service delivery configurations, the activity is fully eligible under the Taxonomy, with the exception of the portion of the TIM Group's Data Centers used only to carry out internal activities functional to the organisation, which is excluded from the scope of eligibility of the Taxonomy.</p>	Climate change mitigation	Tim Spa, Noovle, Gruppo Sparkle, Tim Bra

<sup>(1)</sup> Storage, manipulation, management, movement, control, display, switching, interchange, transmission or reception of a diversity of data across data centers, including edge computing.

# European Taxonomy

	<p>Like the Domestic BU, TIM Brazil has several Data Centers under management, with a total of 33 facilities in operation. Also in this case, only the part of Data Centers not used for internal activities is considered eligible under the Taxonomy, therefore only 2 Data Centers are used for the performance of IT services through the gradual migration to Cloud technology, which will involve the virtualisation of the Data Centers and consequent inclusion in the scope of eligibility.</p>		
8.2 Data-driven solutions for GHG emissions reduction <sup>(2)</sup>	<p>This category includes IT solutions and services offered by TIM that have the potential to reduce the impact of CO2 emissions into the atmosphere. Offerings include mainly smart services for areas such as mobility, home automation, public administration and agriculture, based on IoT solutions that enable intelligent data management for automated and monitoring activities that contribute to society and the wellbeing of the environment. On the other hand the scope of eligibility excludes all activities involved in the development of infrastructures for the provision of ICT services (fixed network, mobile, 4G/5G services), even though they represent a predominant part of the business activities carried out by the Group.</p>	Climate change mitigation	Tim Spa
8.3 Programming and broadcasting activities <sup>(3)</sup>	<p>This category includes services and offers relating to content production and broadcasting activities carried out by the TIM Group through the TIM-Vision marketing solution. The commercial offer comprises different viewer packages consisting of films, TV series, cartoons, entertainment of various kinds, potentially related to the dissemination and awareness of climate change issues and its consequences.</p>	Adaptation to climate change	Tim Spa

<sup>(2)</sup> Development or use of ICT solutions for the collection, transmission and storage of data, as well as their modelling and use where these activities are primarily aimed at providing data and analysis to reduce greenhouse gas emissions.

<sup>(3)</sup> Programming and broadcasting activities include the creation of content and the acquisition of the rights to distribute it, with subsequent broadcasting on radio and television entertainment programs, news programs, talk shows and the like. [...]

# European Taxonomy

Economic activities	Description	Objective	Company
4.1.1 Electricity generation using solar photovoltaic technology <sup>(4)</sup>	These categories include the Distributed Generation project. TIM Brazil has committed significant resources to negotiating renewable sources, implementing a distributed generation plan with solar, hydroelectric and biogas plants leased through third parties. This strategy aims to reduce the company's reliance on the Brazilian energy grid.	Climate change mitigation	Tim Bra
4.5 Power generation from hydropower <sup>(5)</sup>		Climate change mitigation	Tim Bra
4.8 Power generation from bioenergy <sup>(6)</sup>		Climate change mitigation	Tim Bra

<sup>(4)</sup> Construction or operation of power generation plants using photovoltaic solar technology

<sup>(5)</sup> Construction or operation of plants for the production of electricity from hydropower

<sup>(6)</sup> Construction and operation of plants for the production of electricity exclusively from biomass, biogas or bioliquids, excluding the production of electricity from mixtures of renewable fuels and biogas or bioliquids

# European Taxonomy

7.2 Renovation of existing buildings <sup>(7)</sup>	In this category, in line with the previous year, the TIM Group has included projects relating to investments in building renovation and adaptation.	Climate change mitigation	Tim Spa
7.3. Installation, maintenance and repair of energy efficiency devices <sup>(8)</sup>	<p>The following projects have been included in this category:</p> <p><b>Network Maintenance (SAC)</b> The project concerns the replacement/upgrading of the technological equipment serving the fixed network, mobile network and 'SRB centers' (not awarded).</p> <p><b>Co-location - Battery replacement OLO rooms</b> The project refers to the three-year plan for the replacement and efficiency upgrading of power and air conditioning systems at the sites where the OAO are co-located, which are characterised by a high obsolescence and high failure rates.</p> <p><b>IoT Connect Platform for BMS - TIM ECOM</b> The project's main aim is to develop a remote control/remote management system of the electrical machines for the power and air conditioning of the TLC rooms; the project also promotes digital transformation through the presentation and processing of field data collected by the platform enabling more innovative maintenance service scenarios: assisted and predictive maintenance; and it complies with legal obligations to install dedicated meters on a set of cluster buildings to ensure a sufficient sample of measured data for at least the most relevant consumption (Total and TLC). The project, by its very nature, guarantees energy savings that are constantly monitored by the Group.</p>	Climate change mitigation	Tim Spa

<sup>(7)</sup> Development of projects for the construction of residential and non-residential buildings, through the provision of financial, technical and physical resources for building real estate units for sale, as well as the construction of complete residential or non-residential buildings on own account for sale, for a fee or on a contractual basis.

<sup>(8)</sup> Individual renovation measures consisting of the installation, maintenance or repair of energy efficiency devices

# European Taxonomy

5.4. Sale of second-hand goods <sup>(9)</sup>	With regard to the goal of transition to a circular economy, resale and revaluation projects for smartphones and rental activities for retail and enterprise customers, respectively, were identified in these categories.		
5.5. Product-as-a-service and other circular use- and result-oriented service models <sup>(10)</sup>	<p>These projects consist of the following offers:</p> <ul style="list-style-type: none"> <li>- Resale of refurbished phones: TIM offers four reconditioned class A smartphones in its "Mobile Price List", with the aim of guaranteeing customers quality devices at affordable and environmentally friendly prices. The products are purchased from specialised suppliers who process them based on a rigorous process of repairing, replacing and upgrading damaged or worn components.</li> <li>- Decommissioning project: following the decommissioning of obsolete technology Tim, where possible, resells equipment parts (including spare parts such as boards and optical interfaces) or intact assets (such as antenna equipment), fully managing the sales process to brokers or equipment suppliers.</li> <li>- Rental offers in the Small Medium Enterprise (SMB) segment: the rental of mobile products is one of the business strategies considered in the Small Medium Enterprise (SMB) segment, representing an important option in cases where the customer cannot directly own the product, such as in the Public Administration. At the end of the agreed period, the customer may decide whether to return the product or purchase it at a price to be determined at the time of the request.</li> </ul>	Transition to a circular economy	Tim Spa

<sup>(9)</sup> Sale of second-hand goods used for their intended purpose by a customer (natural or legal person), possibly after repair, upgrading or remanufacturing

<sup>(10)</sup> Providing customers (natural or legal persons) with access to products through service models that are either use-oriented, where the product is still at the center but remains the property of the provider and is leased, shared, rented or pooled, or that are result-oriented, where payment is predefined, and the agreed outcome is delivered (i.e. payment per unit of service)

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## The alignment analysis

The alignment analysis process was carried out by the TIM Group in accordance with the provisions of the Taxonomy regulation, examining, for each activity analyzed, compliance with the following fundamental requirements:

- the activity substantially contributes to the achievement of one or more of the established environmental objectives;
- it does not cause significant harm to any of the environmental objectives (Do No Significant Harm - DNSH);
- it meets minimum safeguards, inherent in compliance with social and governance safeguards.

It should be noted that the TIM Group has carried out the necessary investigations and analyses to verify compliance with the technical screening criteria established by the Regulation limited to economic activities already existing and identified as eligible under the first two environmental objectives. In fact, according to the Regulation, the activities related to the remaining four objectives will be analyzed to verify the technical screening criteria and compliance with the minimum safeguards as of 2024 financial year reporting.

With regard to non-core-business activities, in keeping with the precautionary approach adopted the previous year, the TIM Group did not conduct in-depth analyses, giving priority to monitoring business activities of greater significance and impact.

## Substantial contribution to the objective of climate change mitigation

### Analysis of the substantial contribution for Activity 8.1 (Data processing, hosting and related activities)

The scope of analysis for verifying the substantial contribution includes all the Data Centers used for the provision of housing and hosting services, for which the TIM Group has direct control over the provision of the service without the intermediation of third parties and/or the stipulation of any subcontracting agreements. Although the share of Data Centers registered under the European Code of Conduct which implements relevant 'expected practices' increased in 2023, not all facilities managed by the Group signed up to the Code.

Furthermore, although the TIM Group submits the annual report required by the Code of Conduct<sup>(1)</sup> and this report is evaluated by a committee that determines and/or confirms the Data Centers endorsing the code, the implementation of so-called 'expected practices' is currently not subject to independent third-party verification, as expressly required by the substantial contribution of Climate Change Mitigation.

As regards the requirement on the use of refrigerant gases with a Global Warming Potential (GWP ) lower than 675, despite the fact that the TIM Group is fully compliant with the standard in force and

<sup>(1)</sup> Reference document for Data Centre operators that identifies and collates a set of possible implementation measures to improve the energy efficiency of facilities

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has implemented, starting from the 2022 financial year, various solutions that have entailed and will entail the gradual replacement of some gases with a GWP equal to or lower than the limit threshold established in the Taxonomy Regulation, there are still types of refrigerant gases with a global warming potential higher than the pre-established threshold.

As verifying the implementation of the 'expected practices' listed in the European Code of Conduct is not applicable for the Brazil BU, the certifications obtained by the analyzed Data Centers were considered as valid. However, these certifications are not able to fully meet the requirement of the Regulation. Consequently, the requirement for an independent third-party audit is not fulfilled.

Finally, most refrigerant gases used in cooling systems exceed the GWP 675 threshold value.

## **Analysis of the substantial contribution for activity 8.2** (Data-driven solutions for GHG emissions reductions)

According to the requirements of the substantial contribution criterion, the reduction of GHG emissions must be certified by an independent third party. Although it is currently not possible to quantify and certify the reduction in emissions compared to the best alternatives on the market, the TIM Group is considering developing in-house solutions to close this gap.

## **Substantial contribution to the objective of climate change adaptation**

### **Analysis of the substantial contribution for activity 8.3** (Programming and broadcasting activities)

With respect to the requirement to carry out a climate risk assessment and identify adaptation solutions capable of substantially reducing the physical climate risks identified, which was already fulfilled on the

basis of the analyses carried out in 2022, the TIM Group published its first TCFD Report in 2023, disclosing its climate strategy and targets set to actively contribute to the fight against climate change.

In addition, the existing adaptation solutions applied to the assets used for broadcasting activities consisting of monitoring and preventing criticalities were investigated in greater detail. Finally, in order to limit potential damage, the TIM Group has signed up to an insurance program.

With reference to the fifth point verifying activity 8.3, the TIM Group analyzed not only the program schedule of the catalogue it directly licenses, but also of the catalogue offered through partnerships, over which there appears to be less control and visibility to date. In addition, this list also gave visibility to:

- content offered on a 'rental' basis;
- all content offered during the year (including content that is present for a shorter time)

According to the analysis, the share of programs offered by the TIMVision carrier related to climate change issues was marginal in 2023, although it increased slightly compared to 2022.

## **Verification of Do No Significant Harm (DNSH) principles**

In order to verify the compliance of activities with the principles of 'Do No Significant Harm', analyses were conducted at Group level, followed by in-depth analyses at a business unit or individual activity level.

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## Adaptation to climate change

For the mitigation activities under point 8.1 (Data processing, hosting and related activities) and 8.2 (Data-driven solutions for GHG emissions reductions), the requirement includes compliance with Appendix A of the Delegated Act, concerning the climate risk and vulnerability assessment, and an assessment of adaptation solutions. The DNSH criteria overwhelmingly reflect the substantial contribution requirements of this objective, and can therefore be considered to be met.

- As in the case of Activity 8.3, in-depth investigations into the adaptation solutions put in place to safeguard Data Centre facilities were also conducted for Activity 8.1. Once again, the risk analyses carried out for hydrogeological and seismic risks were considered.

In addition, electronic systems for recording environmental conditions, space sealing systems and rainwater drainage and pumping systems are used.

## Sustainable use and protection of water and marine resources

With regard to the verification and subsequent demonstration of compliance with this requirement, please refer<sup>(12)</sup> to the in-depth analysis carried out last year and described in the TIM Group's Sustainability Report 2022. However, to supplement the analyses carried out previously and as confirmation of the TIM Group's constant commitment to improvement, it should be noted that the scope of the Data Centers certified to ISO 14001 and subject to an environmental impact assessment in 2023 was extended.

With regard to the amendments made in 2023 to Appendix B,

according to which the activity does not hinder attaining good environmental conditions of marine waters or does not deteriorate marine waters that are already in good environmental conditions, the requirement is not applicable, as no Data Center uses marine water resources. The requirement is therefore fulfilled.

Regarding water management at BU Brazil Data Centers, an Environmental Policy has been adopted that regulates the cooling system of the facilities by promoting the responsible use of water resources. In addition, an internal environmental management system lists good practices and activities to ensure responsible use. However, no environmental impact assessment is carried out, so the requirement is partially fulfilled.

Finally, the integration of the Appendix B requirement mentioned above also does not apply to the Brazil BU.

## Transition to a circular economy

Il This DNSH criterion applies to the mitigation activities in points 8.1 (Data processing, hosting and related activities) and 8.2 (Data-driven solutions for reducing greenhouse gas emissions) and has several requirements.

With regard to the verification and subsequent demonstration of compliance with this requirement, please refer to the in-depth analysis carried out last year and described in the TIM Group's Sustainability Report 2022<sup>(12)</sup>.

With regard to restrictive-use substance, net of analyses from the

<sup>(12)</sup> <https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-bilanci/2022/TIM-bilancio-sostenibilita-2022-ITA.pdf>

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previous year, the possibility of integrating specific requirements to be submitted to suppliers within device purchasing processes, in order to increase ex-ante control over the use of these substances, was investigated in 2023.

As regards the Brazil BU, the Environmental Management System in place, in line with the relevant Environmental Policy, guides an efficient and responsible management of solid waste, in accordance with current legislation in Brazil, including the National Solid Waste Policy (Law No. 12.305/2010). The company shares with its business partners the responsibility to take back and properly dispose of post-consumer electronic equipment.

For the specific management of electronic waste related to network and IT operations and including waste from Data Centers, TIM adopts the Electronic Equipment and Battery Disposal Management procedure that guides the flow from approval up to final disposal<sup>(12)</sup>. Furthermore, TIM Brazil has strategic agreements in place, overseen by the Logistics and Operations areas, with specialized partners authorized by relevant environmental bodies for the collection of lead batteries and electronic equipment. In addition, during the supplier selection phase, TIM integrates socio-environmental qualification through a special procedure aimed at identifying activities that are potentially critical for the environment. Although waste management is extensively regulated, to date there are no reported activities and/or procedures in place to ensure the eco-design of products and the absence of restricted substances in equipment.

<sup>(12)</sup> <https://www.gruppotim.it/content/dam/gt/sostenibilit%C3%A0/doc-bilanci/2022/TIM-bilancio-sostenibilita-2022-ITA.pdf>

<sup>(13)</sup> This process is supported by the procedure for the Disposal of Mains Materials and Batteries, which details the disposal of mains materials and batteries.

## Minimum safeguards

In line with the requirements of Article 3(c) of Regulation 2020/852, the TIM Group conducts its business activities in compliance with the minimum safeguards specified in Article 18 of the Regulation, i.e. in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, the principles and rights set out in the eight core conventions identified in the International Labor Organisation's Declaration on Fundamental Principles and Rights at Work and the Universal Declaration of Human Rights.

In support of this commitment, the company's operations are subject to strict compliance with numerous policies dedicated to the various areas covered by the regulations. Below is a non-exhaustive list of some of the main policies and control tools, broken down by topic:

## Human rights, including workers' rights

The TIM Group has affirmed its commitment to respecting human rights, within its Code of Ethics and Conduct, and monitors relevant aspects of it through a dedicated policy that applies at Group level and throughout the entire value chain, to protect all workers, staff outside the TIM Group and customers in general<sup>(14)</sup>. All the activities recommended by the policy are the subject of a periodic internal due diligence process (carried out by sending a self-assessment questionnaire), with the aim of identifying and mapping the risks to Human Rights arising from the Group's operations, monitoring

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the effectiveness of the safeguards in place for each of the relevant issues and, in particular, defining a path of increasing stakeholder involvement in respect of these issues. In addition, TIM Brazil's commitment in this direction is taken up in its Social Responsibility Policy, a document that applies to all TIM Group companies in Brazil, and by offering its employees training on Human Rights.

To ensure compliance with the policy and the monitoring of related issues throughout the value chain, the TIM Group gives its suppliers an evaluation questionnaire and carries out periodic audits. For further details on the audit activities carried out, please refer to chapter "Sustainable supply chain" of this document.

The TIM group is also a member of Open-ES, a platform through which it monitors the sustainability performance of its suppliers.

## Taxation

The TIM Group's tax governance is defined in the Group Tax Strategy and Tax Policy. According to these documents, the TIM Group is committed to a completely transparent relationship with the tax authorities. It is also stipulated that tax-related risks are identified and managed through an internal control system (Tax Control Framework). In addition, Tim Brazil, in its Financial Statements, reports the outcome of the audit conducted in accordance with Brazilian and international standards, confirming its intention of having a solid governance and tax strategy.

## Corruption

In order to prevent possible corruption incidents, the parent company TIM S.p.A. and TIM Brazil have implemented an ISO 37001 certified management system. In particular, the TIM Group has various

procedures in place, such as the Code of Ethics, Organizational Model 231 and the Anti-Corruption Policy to confirm its commitment. Additionally, TIM Brazil has implemented an Anti Bribery and Anti Corruption Management System Manual and offers its employees access to anti-corruption training..

## Fair competition

Fair competition is promoted by the TIM Group through technical sessions and initiatives in cooperation with competitors. The TIM Group's sensitivity to this issue is also supported by the Code of Ethics and Conduct, which refers to principles of transparency, fairness and loyalty in both the conduct of business and provision of services. During 2023, the Antitrust Code of Conduct was updated, which provides a systematic framework for the protection of competition for all Group companies. To complement the above, and to counter potential situations of unfair competition, TIM Brazil has drafted a Competition Defense Policy.

Finally, the TIM Group regularly provides adequate and appropriate training/for its corporate bodies and employees.

## Disputes

The TIM Group has not received any final convictions for violations of fundamental and constitutionally guaranteed labor rights, such as freedom of association, discrimination on the grounds of trade union membership, or for violations of human rights, or for bribery, or for tax violations. TIM Brazil has declared that it has no pending convictions or legal actions in relation to the above matters.

With regard to issues related to unfair commercial practices, in 2023

<sup>(14)</sup> The policy was drafted on the basis of recognized international references (such as the UN Universal Declaration of Human Rights, International Labor Organisation, OECD, Guidelines for Multinational Enterprises, etc.) as required by Regulation 852/2020

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there were a number of investigative proceedings against the TIM Group (both in Brazil and in the Domestic BU) that were settled with the payment of relevant fines. For detailed information, please refer to point 2-27 of the chapter 'General Information' in this document.

## Calculation and reporting of economic KPIs

The table below details the accounting criteria and some specific aspects of the methodology for determining the reported values for each of the three KPIs. Regarding the new environmental

objectives<sup>(15)</sup>, for which 2023 is the first reporting year, there are no comparative data with the previous period. Furthermore, in line with the provisions of the Regulation, these objectives are reported in 2023 only for the eligibility aspect.

<sup>(15)</sup> Protection and restoration of biodiversity and ecosystems, Sustainable use and protection of water and marine resources, and Transition to a circular economy.

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KPI	Description	References to the Consolidated Financial Statements
Turnover	The denominator refers to the item "revenue" in the 2023 Annual Report, consolidated in accordance with IAS 1.82(a). The numerator is the net revenues associated with the Group's products related to eligible and/or aligned activities. With regard to the alignment of revenues generated by Activity 8.3, the TIM Group has adopted the same methodology as in the previous year, whereby the percentage aligned is the result of a proportion between the programs meeting the criterion and the entire programming of the 2023 financial year schedule.	Note 26
CapEx	The denominator includes increases in tangible and intangible assets during the year considered before depreciation, amortisation, impairment and any revaluation, including those arising from restatements and reductions in value, for the year in question, and excluding changes in fair value. The denominator also includes increases in tangible and intangible assets resulting from business combinations. Regarding the alignment of investments allocated to activity 8.3, please refer to the methodology described in the section "Turnover".	Notes 6, 7, 8
Type C CapEx	As in the previous year, the TIM Group has included, under Taxonomy-related projects, investments that can be classified as type C CapEx in activities 7.2 and 7.3 of the Delegated Act on the climate.	Notes 6, 7, 8
OpEx	The taxonomy-aligned share of operating expenses (OpEx) results from the proportion of non-capitalised direct costs for research and development, building renovation, short-term rentals, maintenance and repair and any other direct expenditure related to the day-to-day maintenance of property, plant and equipment (numerator) with respect to total OpEx related to the above categories (denominator). In order to avoid risks of double-counting, operational expenditure has been defined as eligible/aligned if it is directly related to economic activities eligible/aligned with the Taxonomy.	Notes 28, 44
Type C OpEx	With the expansion of the scope of eligibility to the Brazil BU, the TIM Group has included, under Taxonomy-related projects, operating expenditure classified in Type C Opex, in activities 4.1, 4.5 and 4.8, respectively.	Notes 28, 44

Turnover

Financial year N	2023			Criteria for substantial contribution						DNSH ("do no significant harm") criteria (h)										
Economic activities	Code	Turnover	share of turnover - Year N	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Share of turnover taxonomy-aligned (A.1) or taxonomy eligible (A.2) year N-1	Enabling activity category	Transitional activity category	
		EUR/000	%	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T	
<b>A. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																				
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																				
8.3 Programming and broadcasting activities	CCA 8.3	3,748	0.023%	NO	YES	N/AM	N/AM	N/AM	N/AM	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.0003%	A		
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		3,748	0.023%	0%	0.023%	0%	0%	0%	0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes				
Of which enabling		3,748	0.023%														0.0003%	A		
Of which transitional		0	0%																	T
<b>A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (g)</b>																				
				AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)											
8.1 Data processing, hosting and related activities	"CCM 8.1 CCA 8.1"	702,106	4.31%	AM	AM	N/AM	N/AM	N/AM	N/AM								3.2%			
8.2 Data-driven solutions for GHG emissions reduction	CCM 8.2	27,754	0.17%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								1.2%			
8.3 Programming and broadcasting activities	CCA 8.3	216,669	1.33%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0.0%			
5.4. Sale of second-hand goods	CE 5.4	1,009	0.01%	N/AM	N/AM	N/AM	N/AM	AM	N/AM								N/A			
5.5. Product-as-a-service and other circular use- and result-oriented service models	CE 5.5	4,300	0.03%	N/AM	N/AM	N/AM	N/AM	AM	N/AM								N/A			
Turnover from activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		951,838	5.84%	4.48%	1,33%	0%	0%	0.03%									4.4%			
Turnover of activities eligible for the taxonomy (A.1 + A.2)		955,585	5.86%	4.48%	1,35%	0%	0%	0.03%									4.4%			
<b>B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY</b>																				
Turnover of activities not eligible for taxonomy		15,340,415	94.14%																	
<b>TOTAL</b>		<b>16.296.000</b>	<b>100%</b>																	
<b>Share of turnover/Total turnover</b>																				
		<b>Aligned by objective</b>		<b>Eligible by objective</b>																
CCM																				4.48%
CCA		0.02%																		5.66%
WTR																				
CE																				
PPC																				0.03%
BIO																				

## CapEx

Financial year N	2023			Criteria for substantial contribution						DNSH ("do no significant harm") criteria (h)									
Economic activities	Code	CapEx	Share of CapEx, year N	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Share of turnover taxonomy-aligned (A.1) or taxonomy eligible (A.2) year N-1	Enabling activity category	Transitional activity category
		EUR/000	%	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
<b>A. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																			
8.3 Programming and broadcasting activities	CCA 8.3	269	0.005%	NO	YES	N/AM	N/AM	N/AM	N/AM	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.013%	A	
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		269	0.005%	0%	0.005%	0%	0%	0%	0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes			
Of which enabling		269	0.005%														0.013%	A	
Of which transitional		0	0%																T
<b>A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (g)</b>																			
				AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)										
8.1 Data processing, hosting and related activities	"CCM 8.1 CCA 8.1"	111,910	2.21%	AM	AM	N/AM	N/AM	N/AM	N/AM								4.6%		
8.2 Data-driven solutions for GHG emissions reduction	CCM 8.2	109,228	2.15%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								2.8%		
7.2 Renovation of existing buildings	CCM 7.2	34,774	0.69%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								N/A		
8.3 Programming and broadcasting activities	CCA 8.3	15,567	0.31%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0.8%		
7.3 Installation, maintenance and repair of energy efficiency devices	CCM 7.3	30,586	0.60%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								N/A		
CapEx of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		302,065	5.96%	5.65%	0.31%	0%	0%	0%									9.6%		
CapEx of activities eligible for taxonomy (A.1 + A.2)		302,335	5.97%	5.66%	0.31%	0%	0%	0%									9.6%		
<b>B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY</b>																			
CapEx of activities not eligible for taxonomy		4,766,396	94.03%																
<b>TOTAL</b>		<b>5.069.000</b>	<b>100%</b>																

Share of CapEx/Total CapEx		
	Aligned by objective	Eligible by objective
CCM		5.65%
CCA	0.005%	3.81%
WTR		
CE		
PPC		
BIO		

## OpEx

Financial year N	2023			Criteria for substantial contribution						DNSH ("do no significant harm") criteria (h)									
	Code	OpEx	Share of OpEx, year N	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Share of turnover taxonomy-aligned (A.1) or taxonomy-eligible (A.2) year N-1	Enabling activity category	Transitional activity category
Economic activities		EUR/000	%	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
<b>A. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																			
8.3 Programming and broadcasting activities	CCA 8.3	0	0	NO	YES	N/AM	N/AM	N/AM	N/AM	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0%	A	
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		0	0	0%	0%	0%	0%	0%	0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0%		
Of which enabling		0	0															A	
Of which transitional																			T
<b>A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (g)</b>																			
8.1 Data processing, hosting and related activities	"CCM 8.1 CCA 8.1"	173,286	11.44%	AM	AM	N/AM	N/AM	N/AM	N/AM								11%		
4.1 Electricity generation using solar photovoltaic technology	CCM 4.1	11,881	0.78%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								N/A		
4.5 Power generation from hydropower	CCM 4.5	5,023	0.33%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								N/A		
4.8 Power generation from bioenergy	CCM 4.8	2,464	0.16%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								N/A		
OpEx of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		192,654	12.71%	12.71%	0%	0%	0%	0%									11%		
OpEx of activities eligible for taxonomy (A.1 + A.2)		192,654	12.71%	12.71%	0%	0%	0%	0%									11%		
<b>B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY</b>																			
OpEx of activities not eligible for taxonomy		1,322,346	87.29%																
<b>TOTAL</b>		<b>1,515,000</b>	<b>100%</b>																

Share of OpEx/Total OpEx		
	Aligned by objective	Eligible by objective
CCM		12.71%
CCA	0.00%	12.71%
WTR		
CE		
PPC		
BIO		

# INDEPENDENT AUDITOR'S REPORT



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## Independent auditor's report on the consolidated disclosure of non-financial information in accordance with article 3, par. 10, of Legislative Decree December 30, 2016, 254 and with article 5, par. 1 item g), of Consob Regulation adopted with Resolution n. 20267 of January 18, 2018

*(Translation from the original Italian text)*

To the Board of Directors of  
TIM S.p.A.

We have been appointed to perform a limited assurance engagement pursuant to article 3, par. 10, of Legislative Decree December 30, 2016, n. 254 (hereinafter "Decree") and article 5, par. 1 item g), of Consob Regulation n. 20267/2018, on the consolidated disclosure of non-financial information of TIM S.p.A. and its subsidiaries (hereinafter "Group" or "TIM Group") for the year ended December 31, 2023 in accordance with article 4 of the Decree and approved by the Board of Directors on March 6, 2024 (hereinafter "DNF").

Our limited assurance engagement does not cover the information included in the paragraph "European Taxonomy" of the DNF, that are required by article 8 of the European Regulation 2020/852.

### Responsibilities of Directors and Board of Statutory Auditors for the DNF

The Directors are responsible for the preparation of the DNF in accordance with the requirements of articles 3 and 4 of the Decree and the "Global Reporting Initiative Sustainability Reporting Standards" defined by GRI - Global Reporting Initiative (hereinafter "GRI Standards"), identified by them as a reporting standard.

The Directors are also responsible, within the terms provided by law, for that part of internal control that they consider necessary in order to allow the preparation of the DNF that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for identifying the contents of the DNF within the matters mentioned in article 3, par. 1, of the Decree, considering the business and the characteristics of the Group and to the extent deemed necessary to ensure the understanding of the Group's business, its performance, its results and its impact.

The Directors are also responsible for defining the Group's management and organization business model, as well as with reference to the matters identified and reported in the DNF, for the policies applied by the Group and for identifying and managing the risks generated or incurred by the Group.

The Board of Statutory Auditors is responsible, within the terms provided by the law, for overseeing the compliance with the requirements of the Decree.

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# INDEPENDENT AUDITOR'S REPORT



## Auditor's independence and quality control

We are independent in accordance with the ethics and independence principles of the *International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code)* issued by the *International Ethics Standards Board for Accountants*, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. In the reference year of this engagement, our audit firm applies the *International Standard on Quality Control 1 (ISQC/Italia 1)* and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

## Auditor's responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the DNF with the requirements of the Decree and of the *GRI Standards*. Our work has been performed in accordance with the principle of *International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information* (hereinafter "*ISAE 3000 Revised*"), issued by the *International Auditing and Assurance Standards Board (IAASB)* for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the DNF is free from material misstatements. Therefore, the extent of work performed in our limited assurance engagement was lower than that required for a full examination according to the *ISAE 3000 Revised* ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the DNF were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the DNF, documents analysis, recalculations and other procedures aimed to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis of the relevant matters in relation to the activities and characteristics of the Group reported in the DNF, in order to assess the reasonableness of the selection process applied in accordance with the provisions of article 3 of the Decree and considering the reporting standard applied;
  2. analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the Decree;
  3. comparison of the economic and financial data and information included in the DNF with those included in the TIM Group consolidated financial statements;
  4. understanding of the following aspects:
    - Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
    - policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
    - main risks generated or suffered related to the matters indicated in the article 3 of the Decree.
- With regard to these aspects, we obtained the documentation supporting the information contained in the DNF and performed the procedures described in item 5. a) below.
5. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the DNF.

# INDEPENDENT AUDITOR'S REPORT



In particular, we have conducted interviews and discussions with the management of TIM S.p.A. and TIM S.A. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the DNF.

Furthermore, for significant information, considering the Group activities and characteristics:

- at group level
  - a) with reference to the qualitative information included in the DNF, and in particular to the business model, policies implemented and main risks, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidences;
  - b) with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- for TIM S.p.A. and TIM S.A., that we have selected based on their activities, relevance to the consolidated performance indicators and location, we have carried out remote interviews during which we have had discussions with management and have obtained evidence about the appropriate application of the procedures and the calculation methods used to determine the indicators.

## Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the DNF of the TIM Group for the year ended on December 31, 2023, has not been prepared, in all material aspects, in accordance with the requirements of articles 3 and 4 of the Decree and the *GRI Standards*.

Our conclusion on the DNF of the TIM Group do not refer to the information included in the paragraph "*European Taxonomy*" of the DNF itself, that are required by article 8 of the European Regulation 2020/852.

Turin, March 26, 2024

EY S.p.A.

Signed by: Ettore Abate, Auditor

*This report has been translated into the English language solely for the convenience of international readers.*

