



**MANAGEMENT OF
EPISODES OF GENDER-
BASED OR SEXUAL
HARASSMENT AND
BULLYING**

Policy in a Nutshell

TIM Group

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1. Why this policy

The TIM Group recognises respect for human dignity and equal opportunities as fundamental values and as essential prerequisites for a healthy, safe and sustainable working environment. Harassing, discriminatory or intimidating behaviours undermine people's wellbeing, the organisational climate and the company's reputation. For this reason, TIM considers it necessary to establish a clear and shared framework that explicitly sets out the expected principles of conduct and the company's position on these matters.

This policy forms part of the broader commitment of the TIM Group regarding Human Rights, Diversity & Inclusion and social responsibility, in line with the Code of Ethics and Group policies, as well as the main international standards and principles.

2. The objectives we have set ourselves

TIM has adopted this policy to clearly and responsibly define how to prevent and address behaviours attributable to gender-based harassment, sexual harassment, stalking and bullying. The objective is to promote a careful and consistent approach that is not limited to the management of individual incidents but strengthens, over time, a proactive culture based on respect, listening and shared responsibility.

In particular, through this policy TIM undertakes to:

- **prevent inappropriate behaviour** by promoting awareness, training and a culture of respect;
- **provide clear and reliable reporting channels** that allow situations of discomfort to be reported within a context of confidentiality and protection;
- **ensure careful and impartial management of reports**, guaranteeing timeliness and consistency in assessments;
- **make dedicated support tools available**, including listening, guidance and psychological and legal counselling services;
- **contribute to professional relationships based on respect and inclusion**, counteracting harassing or intimidating behaviour;



- **guarantee fairness and traceability in management processes**, in line with ethical principles and company procedures.

3. Who it is aimed at and where it applies

The policy concerns all people operating within the company, regardless of their role, location or type of employment relationship. The principles and provisions of the policy also extend to relationships with external parties — such as, by way of example, customers, suppliers, consultants and partners — where such relationships take place within the working environment or are in any case connected to the company’s activities.

The scope of application includes all contexts connected with the performance of work activities, including offices, business trips, meetings in person or remote, virtual areas (such as e-mail, chat, intranet and social networks), events and work-related social situations.

4. Who is responsible for implementation

Implementation of the Policy is entrusted to the company functions involved in the management of reports and incidents covered by the Policy, each within its own areas of competence and responsibility, in accordance with internal procedures. In particular:

- the **Audit Department (DA)** forwards all reports relating to incidents of gender-based harassment, sexual harassment, stalking and bullying to the Supervisory Body (OdV) of TIM, which is entrusted with their management when, due to their particular objective and subjective seriousness, they may be classified as “relevant facts”, potentially harmful to the ethical integrity of the Company;
- the **Human Resources & Organisation Department (HRO)** manages reports relating to incidents of gender-based harassment, sexual harassment, stalking and bullying that do not possess the aforementioned nature of “relevance”, transmitted by the DA upon indication from the TIM OdV. Within its internal structures (HR Commission and the relevant HRO e-Business Partner), the Department carries out the preliminary assessment of reports; oversees the operational management of cases within its



competence; contributes to the definition and implementation of consequent measures in collaboration with the competent company structures;

- the **Compliance Department** ensures the consistency of the Policy with the internal control system, the Organisational Model 231 and Group policies, contributing to risk oversight and governance alignment.

5. The regulatory framework we refer to

The policy is based on an articulated regulatory and contractual framework, which includes in particular:

European references

- European Framework Agreement on Harassment and Violence at Work (2007), as referred to by the Communication of the Commission of the European Communities of 8 November 2007.
- Directive 2002/73/EC on equal treatment between men and women.

Main national and sector references

- National Collective Labour Agreement for the Telecommunications Sector (CCNL TLC) (1 February 2013), the articles concerning workplace relations and disciplinary sanctions (Articles 45 and 48).
- Interconfederal Agreement on Harassment and Violence in the Workplace (25 January 2016).
- Framework Agreement on Harassment and Violence in the Workplace – telecommunications sector (Asstel, 16 January 2019).
- Italian Civil Code (Article 2043).
- Italian Criminal Code, with reference to the offences of defamation (Article 595), propaganda and incitement to commit crimes on grounds of discrimination (Article



604-bis), sexual violence (Article 609-bis), threats (Article 612), stalking (Article 612-bis) and harassment or disturbance of persons (Article 660).

- Regulations concerning civil offences (Legislative Decree no. 7 of 15 January 2016).
- Regulations concerning equality and protection against gender-based violence (Legislative Decree no. 145/2005; Laws no. 38/2009 and 69/2019).
- Employment regulations (Legislative Decree no. 81/2015).
- Regulations concerning reporting and protection of reporting persons – Whistleblowing (Law no. 179/2017).
- 2018 Budget Law (Law no. 205/2017).

6. The main contents of the Policy

The Policy defines a structured process for the management of incidents of gender-based harassment, sexual harassment, stalking and bullying, including where such behaviours are only perceived. The process is aimed at guaranteeing the protection of the dignity of the people involved regardless of ethnicity and nationality, religion, gender, age, sexual orientation and disability, ensuring the confidentiality of information and the anonymity of the reporting person through the fair and impartial handling of each report.

The process envisaged by the Policy is divided into the following phases.

6.1 Reporting incidents

Incidents governed by the policy are reported through the **Whistleblowing Portal**, which represents the main channel for activating the process.

The Portal is accessible to all employees of the TIM Group, as well as to any interested Third Parties (for example customers, suppliers and their employees, consultants or partners and the entire value chain and, more generally, categories of vulnerable and/or marginalised people), who may also submit reports anonymously.



6.2 Preliminary assessment of the report

Reports entered into the Whistleblowing Portal (by the person concerned or by any other receiving party) are transmitted by the Audit Function to the TIM OdV, which is entrusted with their management when, due to their particular objective and subjective seriousness, they may be classified as “relevant facts”, potentially harmful to the ethical integrity of the Company.

Where they do not possess such a nature of “relevance”, the TIM OdV instructs that they be transmitted by the Audit Function, for the appropriate follow-up, to the **HR Commission, composed of the competent functions, which carries out the preliminary assessment and any necessary investigations**. For such reports, at the end of the preliminary assessment by the HR Commission, the report may be:

- archived, where it is clearly unfounded or irrelevant;
- forwarded to the relevant HRO Business Partner for the appropriate follow-up, where elements emerge requiring the launch of the operational management phase.

The preliminary assessment is carried out in compliance with the principles of confidentiality, impartiality and protection of the people involved, in accordance with the Policy and company procedures.

6.3 Operational management of the report

Following the preliminary assessment by the HR Commission, operational management is entrusted to the relevant HRO Business Partner, who coordinates investigation and verification activities, involving the competent company functions and, where appropriate, external experts.

Within the scope of operational management, on the basis of the evidence that emerges, the most appropriate actions are identified and adopted, which may include:

- management and organisational measures (meetings, corrective actions, awareness initiatives);



- the initiation of disciplinary proceedings, where required, in compliance with applicable legislation and collective bargaining agreements.
- Where it emerges that a report has been made with malice or gross negligence, the consequent actions against the reporting person are assessed and adopted.

6.4 Communication of the outcome

At the end of the management process for such Reports, the HR Commission communicates to the Audit Function the outcomes of the checks carried out, and any measures adopted, for subsequent disclosure and proposal for closure to the relevant Supervisory Body.

6.5 Support tools for the reporting person

Alongside the process for reporting and managing cases, the Policy provides dedicated support tools designed to offer listening, guidance and assistance to people experiencing or witnessing situations of discomfort, even without activating a formal report.

In particular, provision is made for the “Person of Trust”, an external and independent figure with respect to the company, identified in order to guarantee neutrality, confidentiality and qualified listening. The Person of Trust offers a protected space for discussion and guidance, without assuming decision-making roles or intervening in the management of reports.

The following are also available:

- a psychological support service;
- a legal advice service.

All these services are accessible free of charge and may be used in compliance with confidentiality and professional secrecy.

The support tools do not replace the official reporting channels provided for by the Policy. Information on how to access these tools is available through company information channels.

6.6 Protection and safeguarding of the reporting person



During all phases of the process, the Policy guarantees the protection and safeguarding of the reporting person and the persons involved.

In particular, the following are ensured:

- confidentiality of the identity and information processed;
- protection from any form of retaliation, discrimination or penalisation connected to the report;
- the possibility of making reports anonymously, according to the envisaged criteria;
- impartial and fair management of reports, in compliance with applicable legislation.

The submission of clearly unfounded reports, made with malice or gross negligence, constitutes a violation and may result in consequent actions, in compliance with the safeguards envisaged.

7. How sustainability is integrated into the Policy

Sustainability within the TIM Group centrally includes attention to social aspects, people's wellbeing and the protection of their rights in working environments.

Within this framework, the Policy on the Management of Gender-Based, Sexual Harassment and Bullying Incidents represents a concrete implementation of Human Rights principles, translating the values of respect, dignity and non-discrimination into rules, processes and operational tools for the prevention, reporting and management of incidents. The integration of sustainability is achieved in particular:

- through the connection between principles and processes, via alignment with the Code of Ethics, the Human Rights Policy, policies concerning human resources and equal opportunities, and the Whistleblowing Procedure;
- through the prevention and management of social risks, thanks to a structured system that enables the identification, management and reduction of behaviours potentially harmful to people's rights, dignity and wellbeing;
- through the structured and traceable management of reports, which contributes to mitigating potential organisational, social and reputational impacts linked to



harassment, discrimination or inappropriate behaviour, ensuring impartiality and fairness in case management;

- through the effective protection of people, by means of protection of the reporting person, confidentiality of information and the availability of dedicated support tools.

8. Key Words

- **Harassment:** psychological, physical or verbal behaviours, including isolated incidents, which have the purpose or effect of harming a person's dignity or creating an intimidating, hostile, degrading or offensive working environment, in relation to characteristics protected by law (such as, by way of example, gender, age, origin, religion or disability). Harassment may generate discomfort or anxiety, hinder the performance of work activities or negatively affect professional opportunities.
- **Gender-based harassment:** harassing behaviours based on sex, sexual orientation or gender identity, which violate the principle of equal treatment and respect for the person. They may manifest themselves, for example, through verbal abuse, derogatory attitudes, limitations or obstacles to professional growth, exclusion, sabotage or improper dissemination of information.
- **Sexual harassment:** unwanted conduct of a sexual nature, whether physical, verbal or non-verbal, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile or degrading working climate. Intentionality is not required and may include, by way of example, unwanted physical contact, jokes or comments of a sexual nature, offensive requests or the sharing of inappropriate material.
- **Stalking:** repeated persecutory behaviours over time (such as, by way of example, threats, stalking, persistent or invasive communications) which cause the victim a state of fear or anxiety or result in an alteration of their habits of life. Stalking is an offence under the Criminal Code.
- **Bullying:** a set of offensives, hostile or vexatious behaviours, of a psychological or physical nature, repeated over time, aimed at harming, isolating or devaluing a



person in the workplace. It manifests itself, for example, through insults, humiliation, systematic exclusion, sabotage or excessive control, and is characterised by continuity, harm, perception of victimisation and imbalance of power.