ARTIFICIAL INTELLIGENCE

Guidelines in a Nutshell

TIM Group

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1. Why this policy

Artificial Intelligence (AI) is increasingly present in people's lives and in business processes, representing a key driver of innovation and digital transformation. As a leader in digital innovation in the countries in which it operates, the TIM Group intends to seize the opportunities offered by AI to optimize its operations, improve services and contribute to the development of the economic and social context.

At the same time, TIM is aware of the potential ethical, legal and social risks associated with the use and development of AI Systems. For this reason, it has adopted the Artificial Intelligence Guidelines, which define a clear reference framework to ensure that AI is used in an ethical, fair and responsible manner, in compliance with fundamental human rights, applicable regulations and the values set out in the Group Code of Ethics and Conduct, in line with the provisions of the AI Act.

2. The objectives we have set

The Artificial Intelligence Guidelines have been adopted to support the technological evolution of the TIM Group with a structured and responsible approach, capable of translating ethical principles into concrete behaviors.

In particular, the Guidelines aim to:

- define the ethical principles guiding the development, use and procurement of AI Systems within the TIM Group;
- provide a corporate-level regulatory reference framework;
- describe roles, responsibilities and organizational safeguards dedicated to AI governance;
- ensure that the adoption of AI takes place in the interest of the Company and its stakeholders, guaranteeing security, reliability and protection of rights.

3. Who it is aimed at and where it applies

The Artificial Intelligence Guidelines apply to the Italian and foreign companies of the TIM Group – for the latter as a "reference framework" – and, more specifically, to a broad and

cross-functional perimeter of subjects who, in various capacities, are involved in the development, use or procurement of AI Systems, such as:

- employees;
- members of corporate bodies;
- management;
- external collaborators;
- third parties that maintain business relationships with the Group, where provided for by the corporate procedural system.

The Guidelines apply to all activities involving the **development**, **use** or **procurement** of Artificial Intelligence Systems, regardless of the corporate function involved, the operational context or the type of solution adopted, including the **processes of ideation, design and delivery of offers, products and services intended for customers**.

The Guidelines therefore constitute a common and binding reference to guide the behavior of the recipients and to ensure that the adoption of AI takes place in compliance with applicable regulations, internal procedures and the values of the TIM Group, preventing ethical, legal and reputational risks.

4. Who is responsible for implementation

The implementation of the Artificial Intelligence Guidelines is supported by a structured governance model, designed to ensure coordinated, responsible and compliant management of AI within the TIM Group, with a clear allocation of roles and responsibilities.

The **Artificial Intelligence Committee**, chaired by the Chief Executive Officer, represents the core of AI operational governance. The Committee defines the corporate strategy for the adoption of AI Systems, identifies use cases aligned with the Group's priorities, guides architectural choices and ensures that the adopted solutions comply with applicable regulations and are consistent with the Code of Ethics and Conduct. The Committee also periodically assesses the relevance and applicability of the Guidelines, promoting their possible updating.

The **Board of Directors** exercises a strategic steering role, demonstrating leadership and commitment on Artificial Intelligence matters. In particular, it approves the Guidelines and

receives periodic information, at least on a semi-annual basis, on the main activities carried out in the AI domain, ensuring that the Group's strategy is consistent with the adopted ethical and regulatory principles.

The **Control and Risks Committee** performs preparatory, advisory and proposal functions in support of the Board of Directors. The Committee receives updates on AI projects and their progress status, oversees the implementation of the Guidelines and contributes to the safeguarding of the Internal Control and Risk Management System in relation to AI Systems.

The **Transformation Function**, within the Chief Financial Office area, supports the AI Committee by ensuring the collection and synthesis of initiatives, the coordination of cross-functional projects, the monitoring of objectives and consistency with the Group Transformation Plan.

Finally, the **Specialist Functions** provide technical, regulatory and ethical support to AI initiatives, contributing to the application of the ethical framework, risk assessment and implementation of the decisions taken by the governance bodies.

5. The regulatory framework we refer to

The Guidelines are based on a **structured regulatory framework**, which includes **European and international references on fundamental rights, personal data protection, AI ethics and security**, including:

- Charter of Fundamental Rights of the European Union;
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonized rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act);
- European Commission Guidelines of 25 November 2021 "Ethics by Design and Ethics of Use Approaches for Artificial Intelligence";
- Regulation (EU) 2016/679 (GDPR);
- Directive 2002/58/EC (e-Privacy Directive);
- UNESCO "Recommendation on the Ethics of Artificial Intelligence";

- GSMA – "The AI Ethics Playbook: Implementing ethical principles into everyday business";
- Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law.

At **internal level**, the Guidelines are consistent with the Group Code of Ethics and Conduct, the Organizational Model pursuant to Legislative Decree 231 and corporate policies and procedures on information security, ICT compliance and personal data protection.

6. The main contents of the Policy

The Guidelines define the **ethical principles and behaviors** to be adopted for the development, use and procurement of AI Systems within the TIM Group.

The TIM Group's approach to AI is based on principles such as human centricity and human oversight, protection of fundamental rights, equality and non-discrimination, transparency and clarity of operating logic, personal data protection, accountability, sustainability, robustness and security of adopted solutions, as well as cooperation with partners and stakeholders.

In line with these principles, the Guidelines identify **specific behaviors to be adopted in the use of AI Systems**, which must take place in compliance with regulations, ensuring, among other things, transparency towards data subjects and protection of privacy. Similar safeguards are provided for the development of AI Systems, which must follow an Ethics by Design and Dynamic Ethics approach, exclude prohibited practices, ensure security, robustness and compliance requirements and provide corrective measures in the event of critical issues.

The Guidelines also regulate the procurement **of AI Systems**, requiring verification of regulatory compliance and the supply chain, compliance with internal procedures and the adoption of solutions consistent with corporate objectives.

Finally, the Guidelines provide specific **reporting obligations** in the event of serious incidents, malfunctions of AI Systems, discriminatory or biased outcomes, as well as situations that may pose risks to health, safety or fundamental human rights.

Reports must be made through the channels and according to the methods defined by the corporate procedural system, which governs internal information flows and applicable control safeguards.

7. How sustainability is integrated into Artificial Intelligence

On the one hand, the adoption of AI can help improve process efficiency, service quality and analytical and preventive capabilities, with positive effects in terms of operational reliability and decision support.

On the other hand, the use of AI systems can generate negative impacts if not adequately safeguarded, such as discriminatory effects or bias in decision-making processes, risks to people's rights and dignity, lack of transparency and comprehensibility of adopted solutions, as well as potential increases in energy consumption linked to the development and use of high computational intensity technologies.

The Artificial Intelligence Guidelines address these aspects by defining criteria and rules for responsible AI management, aimed at:

- preventing and mitigating risks associated with the use of AI systems;
- ensuring respect for fundamental rights, non-discrimination and human oversight;
- ensuring transparency, traceability and control throughout the entire system life cycle;
- promoting a conscious use of AI, attentive also to indirect environmental impacts, in a perspective of balance between operational benefits and consumption effects.

In this way, Artificial Intelligence is integrated into business processes as an enabling but controlled technology, capable of generating value and opportunities.

8. Keywords

Below are the definitions of the main technical terms referred to in the document.

- **Artificial Intelligence System (AI System):** automated system, with varying levels of autonomy, capable of generating outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments.

- **AI Act:** european regulation that establishes harmonized rules for the development, placing on the market and use of Artificial Intelligence Systems.
- **Ethics by Design:** approach that provides for the integration of ethical principles from the earliest stages of design and development of AI Systems.