

GUIDELINES FOR TIM GROUP'S RELATIONS WITH LOCAL INSTITUTIONS

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Introduction

TIM Group undertakes on a daily basis to ensure that relations with public administration and local authorities are lasting and satisfactory, in the belief that this is the only way to create the conditions to develop the territory and improve the quality of life of citizens, at the same time allowing the Local Authorities and TIM Group to achieve their respective objectives.

TIM's objective is to spread technological innovation throughout the country through the construction of fixed and mobile ultrabroadband networks, as well as to digitise the processes of public and private organizations in the conviction that this undertaking will generate the smart, sustainable and inclusive growth of the country.

How we interact

TIM Group has a central department focused entirely on managing relations with local authorities, which also makes use of "Local Authority Accounts" (LAA) across the country; LAAs are figures specialized in institutional relations on matters concerning the development of fixed and mobile networks.

The Relations with Local Authorities department, as part of its duties:

- > carries out all possible actions of an institutional nature aimed at facilitating the development of the fixed and mobile telecommunications network;
- determines the criteria used to select the local authorities with which to establish relations, and the ways in which these relations are to be managed;
- > assesses the risks and opportunities arising from such relations;
- > establishes priorities;
- > contributes to drawing up agreements with local authorities;
- ➤ listens systematically to all requests and reports from local authorities and directs them correctly to the relevant departments within TIM Group:
- organises listening sessions and information meetings;
- > supports other TIM Group departments in the achievement of territorial projects:
- > prevents disputes arising, above all in reference to network development issues;
- > organises sessions with LAAs to share information on relevant matters.

Particular attention is paid to organizations that deal with issues relating to:

- > the development of fixed and mobile ultrabroadband networks;
- > the achievement of objectives set in local Digital Agendas;
- improving public ICT services;
- > the aggregation of municipalities aimed at providing information, raising awareness and training local authorities;
- > the spread of the digital culture.

In full compliance with the principles of transparency and accountability, TIM Group responds flexibly to requests received - through whichever channel - from Local Institutions.

Joint projects between TIM Group and local authorities are managed in a way that define the roles and duties of each party, formal control mechanisms and measurement tools. TIM Group promotes the formation of joint control committees, i.e. committees formed of representatives of all the parties involved. The composition and objectives of the committees are determined according to the specific requirements of the project and provide for the presence of stakeholders without any kind of discrimination, in particular without gender discrimination.

Given the ubiquity of its network, TIM Group has relations with local authorities in all regions and always assesses the impacts of its operations and development plans, regardless of the type of intervention, which in any case is always carried out in full compliance with current legislation and with the needs of local authorities.

Monitoring and constant interaction with the decision-making centres of local institutions take place by means of hearings, including the presentation of position documents relating to the drafting of local regulations, and involvement in workshops as well as in the work of regional commissions and ministerial and specialist work groups. Furthermore, TIM Group frequently organises communication initiatives on specific issues of local interest.

At any moment, TIM Group provides tools through which Local Authorities can communicate, and in particular it provides tools for complaints as well as anonymous whistleblowing channels.

Transparency and proper behaviour

The conduct of TIM's Group people must always be compliant with Telecom Italia's Code of Ethics and with all other Telecom Italia's Codes and Procedures, in particular, with the Procedure for Countering Corrupt Practice and the so called "231 Organizational Model", pursuant to Legislative Decree 231/2001.