



# **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

We have chosen to adopt the policy *“Management of episodes of gender-based, sexual harassment and bullying”* because we believe that an inclusive working environment is the foundation for people’s well-being and for the success of the company. Experience has taught us that those who feel welcomed and valued are able to give their best, contributing concretely to the collective results. Harassment generates fear and anxiety in the victim, creates intimidating, hostile and offensive working environments, interferes with individual work performance and impacts a person’s different employment opportunities. For this reason, this policy arises from the desire to take care of people, enhance talents and build a fairer future for everyone.

For years, we have been committed to promoting respect for diversity and to combating all forms of discrimination, bullying or harassment. This is not only about complying with rules or adhering to international principles, but about creating every day a climate of trust, dialogue and collaboration. We want everyone to have the same growth opportunities, regardless of gender, age, origin, orientation or ability. We are convinced that the richness of perspectives and experiences is a valuable resource that makes TIM a better place to work and grow together.

## 2. The objectives we have set ourselves

The core objective of this policy is to build a working environment in which respect is the foundation and every person can feel protected and valued. The approach does not merely involve intervening when situations of discomfort arise, but acting proactively to prevent them, adopting a systemic approach that integrates corporate culture, concrete tools and shared responsibilities.

The policy formalises specific processes and pathways to prevent, reduce and manage all forms of gender-based harassment, sexual harassment and bullying, both within and outside the Company, thus promoting a safe, inclusive working environment oriented towards the well-being of all.



More specifically, we commit to:

- **preventing inappropriate behaviour** through training, awareness initiatives and the dissemination of a culture of respect and awareness;
- **offering clear and secure channels** for reporting harassment, bullying or discrimination, ensuring confidentiality and protection;
- **intervening promptly in the event of reported episodes**, assessing the facts impartially and adopting the most appropriate measures;
- **supporting the people involved**, both those who suffer and those who report, through dedicated services (listening, guidance, psychological and legal counselling);
- **promoting an inclusive working environment** in which everyone feels free to express themselves and participate without fear of exclusion or judgement;
- **ensuring transparency and traceability** in management procedures, in compliance with regulations and corporate ethical values.

### **3. Who it is aimed at and where it applies**

This Policy is addressed to employees of TIM S.p.A. and to the Italian companies of the TIM Group (the “Domestic” scope) and represents a reference framework for all foreign companies of the TIM Group, which will adopt its principles taking into account local regulations and internal procedures.

It applies to all people working within the company, regardless of role, location or type of contract. It also includes external collaborators and third parties (such as customers, suppliers and consultants) when they interact with the company’s working environment.

The scope of application includes any work-related context: offices, business trips, virtual environments (e-mail, chat, social networks, intranet, etc.), in-person or online meetings, events and social situations.



## **4. Who is responsible for implementation**

The Policy has been drafted and approved by the “Compliance” Department and the “Human Resources & Organization” function. The entire process is overseen by the HR function, which coordinates operational activities and ensures compliance with procedures, the correct execution of assessments, the communication of outcomes to the competent structures and the transmission of relevant information to the Supervisory Body pursuant to Legislative Decree 231, relying on an interfunctional network of dedicated contacts and committees for the effective implementation of the Policy.

## **5. The regulatory framework we refer to**

The main regulatory references for this policy include:

- Communication from the Commission of the European Communities to the Council and the European Parliament dated 8 November 2007, presenting the European Framework Agreement on harassment and violence at work signed on 26 April 2007 by CES, BUSINESSEUROPE, UEAPME and CEEP;
- National Collective Labour Agreement for Telecommunications of 1 February 2013: Art. 45 – Relationships in the Company (see points 1, 2 and 4) and Art. 48 – Dismissal for misconduct;
- Interconfederal Agreement of 25 January 2016 – Framework Agreement on harassment and violence in the workplace;
- Framework Agreement on harassment and violence in the workplace signed on 16 January 2019 between Assotelecomunicazioni – Asstel and SLC CGIL, FISTEL CISL, UILCOM UIL;
- Italian Civil Code, Art. 2043 – Non-contractual liability;
- Italian Criminal Code (Arts. 594, 595, 604-bis, 609-bis, 612, 612-bis, 660);
- Legislative Decree no. 145 of 30 May 2005 on equal treatment between men and women;
- Law no. 38 of 23 April 2009 on combating sexual violence and stalking;



- Legislative Decree no. 81 of 15 June 2015 (“Jobs Act”);
- Law no. 179 of 30 November 2017 on whistleblowing;
- Budget Law 2018 (Law no. 205 of 27 December 2017);
- Law no. 69 of 19 July 2019 on the protection of victims of domestic and gender-based violence.

## **6. The main contents of the Policy**

In the event of episodes of gender-based harassment, sexual harassment or bullying – even if only perceived – a structured process is envisaged to receive, manage and promptly resolve each situation, protecting the dignity of the people involved and preserving a safe, respectful and inclusive working environment. Each employee has the right (and responsibility) to report inappropriate behaviour through a dedicated channel available on the Intranet, with the guarantee of full confidentiality and protection from any form of retaliation.

The process consists of the following phases:

- **Reporting of the episode**, through:
  - Corporate Reporting Portal: <https://portalesegnalazioni.telecomitalia.it>;
  - Dedicated e-mail: [peoplecaring@telecomitalia.it](mailto:peoplecaring@telecomitalia.it);
  - HR contact person or line manager;
- **Preliminary assessment of the report**, entrusted to an interfunctional committee composed of:
  - competent HR functions;
  - any external experts or privacy contacts, depending on the nature of the report;
- **Operational management**, including:
  - managerial measures (interviews, reorganisations, awareness actions) in less serious cases;
  - initiation of disciplinary proceedings in more serious cases, involving the competent functions;
- **Protection of the reporting person**, through:



- measures against any form of retaliation or discrimination;
- guarantee of anonymity and confidentiality;
- **Communication of outcomes**, handled by the HR function:
  - towards the internal committee and the Audit Department for subsequent reporting and closure proposal to the relevant Supervisory Body;
- **Human and specialist support**, through:
  - the “Person of Trust”, an external third party providing listening and guidance;
  - “Legal Advice”, a free service provided by external lawyers specialised in harassment and discrimination matters;
  - a confidential psychological support desk and a dedicated legal advice service.

In the event of an unfounded report, the HRO Business Partner concludes the investigation and initiates actions against the reporting person if it emerges that the report was made with the intention of harming the reported individual. If the report is substantiated, the HRO Business Partner implements the necessary measures against the person responsible for the harassing behaviour.

## **7. How sustainability is integrated into the Policy**

Within the TIM Group, sustainability translates into concrete actions to protect people and their rights. The Policy on the Management of Episodes of Gender-Based and Sexual Harassment and Bullying represents a fundamental safeguard to ensure an inclusive, respectful and safe working environment.

Together with the Code of Ethics, the Human Rights Policy, the Human Resources and Equal Opportunities Policy and the Whistleblowing Procedure, this policy affirms the rejection of any form of discrimination, harassment or bullying, ensuring clear reporting pathways, protection of anonymity and confidentiality of information. TIM adopts a zero-tolerance policy towards retaliation, also protecting workers’ representatives and promoting a corporate culture based on integrity, fairness and responsibility.



## 8. Key Words

- **Harassment:** psychological, physical or verbal behaviours – even isolated – showing hostility or aversion towards a person for reasons related to race, gender, religion, disability, age or other legally protected factors.
- **Gender-based harassment:** hostile behaviours based on sex, sexual orientation or gender identity that violate equal treatment.
- **Sexual harassment:** unwanted acts of a sexual nature – physical, verbal or non-verbal – that violate personal dignity and create a degrading working environment.
- **Stalking:** repeated persecutory behaviours that generate fear or anxiety and modify the victim's habits of life.
- **Bullying:** offensive psychological or physical actions, repeated over time, aimed at harming or isolating a person at work.