



**POLICY**  
**MANAGEMENT OF INCIDENTS OF GENDER HARASSMENT,**  
**SEXUAL HARASSMENT AND BULLYING**

**ABSTRACT**

**MAY 2021**

## What is harassment and what are its effects?

Harassment is hostile or derogatory behaviour shown towards another person due to the race they belong to, the colour of their skin, their beliefs, religion, ideology, gender, national origins, age, marital status, disability, state of pregnancy/maternity and/or any other category protected by law.

There are different types of harassment:

- gender harassment
- sexual harassment
- stalking
- bullying

Harassment generates fear and anxiety in the victims, creates intimidating, hostile and offensive work environments, interferes with individual work performances and impacts the different employment opportunities of a person.

## TIM's commitment

The “Gender harassment, sexual harassment and bullying” policy and the services available to TIM people.

The company undertakes not to tolerate behaviours similar to gender harassment, sexual harassment or bullying, verifying that there is respect between people and creating opportunities to raise awareness about all forms of harassment by disseminating information on the tools available to everyone to prevent, limit and manage harassment.

In particular, it undertakes to raise awareness and provide ongoing training to all its people with a specific plan covering both how the policy operates and the related tools for preventing and managing harassment and how to prevent behaviours associated with harassment or bullying.

TIM protects people who are victims of harassment with a privacy protection guarantee and rules out any retaliatory action. In cases of harassment the company becomes aware of, TIM ensures the undesired behaviour shall cease immediately also, where possible, assigning the harasser to another office where this coincides with that of the victim.

Under its “Gender harassment, sexual harassment and bullying” policy, TIM makes the following tools available:

- Training and communication
- External support paths to aid reporting which can be accessed by individual persons without company intermediation:
  - Person of Trust
  - Legal advice
  - Psychological Assistance.
- Internal reporting avenues:
  - Anonymous or non-anonymous reporting through the “Whistle Blowing” portal, accessible from the Intranet and Internet
  - Reporting Manager / HRO Business Partner
  - Send an e-mail to [peoplecaring@telecomitalia.it](mailto:peoplecaring@telecomitalia.it)

## The Commitment of TIM People

We can all help to ensure respect for people's rights, value and dignity and to maintain a work environment where harassment, bullying and all sexually inappropriate behaviour are considered unacceptable.

Where harassment, bullying or sexually inappropriate behaviour occurs or is attempted, all TIM people, without prejudice to the possibility of contacting the relevant authorities, have the right to report it through a specific Reporting Portal on the company Intranet or from the address <https://portalesegnalazioni.telecomitalia.it>, as indicated in the “Whistleblowing Procedure”.

Alternatively, reports may also be made through: the HRO Business Partner of reference, the direct manager or hierarchical superior, who in turn will involve the Human Resources department of the Group Company, or by sending an email to the address [peoplecaring@telecomitalia.it](mailto:peoplecaring@telecomitalia.it).

### **What happens after a report is made**

A committee, which will operate with the utmost confidentiality, will assess the report and forward it to the HRO Business Partner of reference in order to:

- start specific analyses involving the company departments concerned by the report and the Privacy Department
- if necessary, seek the assistance of experts or external consultants of the TIM Group
- assess the results of the in-depth analysis of the report relating to reported workers
- put special protection in place for the reporting person.

In the case of unfounded reports, the HRO Business Partner will conclude the investigation and initiate action against the reporting person if it emerges that the report was made with the intention of harming the reported person. If the report is justified, the HRO Business Partner will put the necessary measures in place with respect to the person responsible for the harassing behaviour.

### **How can the external support paths be accessed**

If the employee, due to the harassment, bullying or sexually inappropriate behaviour they believe they are a victim of or have witnessed, is in a fragile emotional or disoriented state or does not feel ready to make the report immediately but instead needs to discuss it with an expert in harassment incidents, they may make use of the following services:

- **Person of Trust:** a professional figure external to the company who will listen and provide guidance to the employee(s) who want an opinion on what has happened, need to understand how to interpret the events and how to conduct themselves, and seek clarification on the policy and the channels available to them to address any problematic situation, without this being considered a report.
- **Legal advice service:** provided by expert lawyers in such matters and external to the company, who can be contacted by employees who have fallen victim to such behaviour to discuss the legal significance of the events of which they were victim and/or the legal tools available.
- **Psychological Support For TIM People:** The telephone psychological support service offers anonymous and confidential support to men and women. The consultations are provided directly by psychologists and psychotherapists on the national register. The psychologist provides the caller with understanding, ongoing support and points them to other local authorities on the basis of the specific case.