



BUSINESS ETHICS

Insight

TIM Group

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1. Insights on the Anti-Corruption Policy

The TIM Group's Anti-Corruption Policy is approved by the Board of Directors. The Board has identified the Compliance Department as the function responsible for corruption prevention, as well as for the implementation and monitoring of the Anti-Corruption Management System (ACMS) within the company, and more generally, for ensuring the system's compliance with the requirements of ISO 37001:2016.

The Anti-Corruption Policy aims to:

- Manage corruption risk according to a “zero tolerance” approach
- Ensure compliance with Anti-Corruption Laws
- Protect the Company from the adverse consequences of non-compliance with Anti-Corruption Laws, including reputational and image-related damage
- Encourage the use of reporting tools for acts of corruption, including by third parties engaged in business relations with the Company
- Strengthen awareness of rules to foster active and responsible participation by all recipients in achieving the objectives of the Anti-Corruption Management System
- TIM recognizes the importance of Anti-Corruption Laws and rejects all forms of corruption, avoiding and condemning corrupt practices and, more generally, any unlawful or unethical behavior aimed at achieving its economic objectives. To this end, TIM has adopted an Anti-Corruption Management System, of which the Anti-Corruption Policy is an integral part, designed to prevent, detect, and respond to corruption-related activities and to ensure compliance with Anti-Corruption Laws.

The Policy, among other things, provides for:

- the principles of conduct to be followed in dealings with third parties, prohibiting any corrupt behavior, incitement to corruption, or any conduct leading to corrupt agreements;



- the methods and processes through which the Group seeks to prevent extortion and corruption, including the validation of counterparties through Anti-Corruption Due Diligence;
- specific guidelines on gifts, whether given to public officials or private parties, or received by employees and members of corporate bodies from third parties;
- the prohibition on directly or indirectly granting or offering contributions or other benefits to political parties or movements and/or related foundations, associations, committees, entities, as well as labor unions, their representatives, leaders, or candidates, while complying with applicable laws;
- the introduction of regular and appropriate training on extortion and corruption, specifically on the Anti-Corruption Policy, its implementing procedures, the Anti-Corruption Management System, and relevant regulations;
- specific guidelines for events and sponsorships, which must have a genuine link to business purposes and comply with a defined authorization process;
- the methods for reporting, based on reasonable belief (or in good faith), attempted, suspected, or actual corrupt actions or violations of the Anti-Corruption Policy and/or the Code of Ethics and Conduct and/or the Organizational Model 231 and/or the Anti-Corruption Management System, or more generally the internal control system, by contacting TIM's Audit Department (so-called whistleblowing);
- a disciplinary system that may include the application of sanctions in the event of Policy violations.

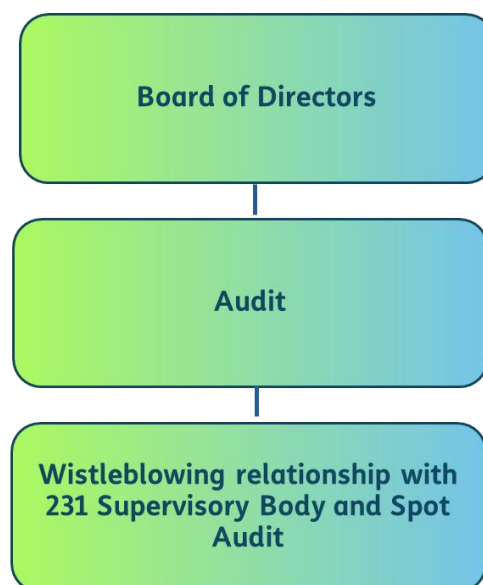
For more details on the matters covered by the Policy, please refer to the TIM Group Anti-Corruption Policy available at the following link: [policy anticorruzione ITA layout esterno 30092016 finale__1](#)



2. Insights on the Whistleblowing Mechanism

TIM Group entrusts the Audit Department with oversight of the Whistleblowing channel. In particular, this oversight is ensured through the “**Whistleblowing Relationship with 231 Supervisory Body & Spot Audit**” function, which guarantees:

- the management of reports (whistleblowing)
- support in relations with the 231 Supervisory Body
- the management of unplanned Audit activities
- the management of the company’s whistleblowing mechanism rights related to trade unions as governed by National Collective Labor Agreements.



- It ensures the management of whistleblowing reports, support in relations with the 231 Supervisory Body, as well as the management of audit activities not included in the Plan that arise from requests from the Control Bodies and Senior Management.

It should also be noted that if a report is to be made orally, it is possible to request a direct meeting with a member of TIM’s Supervisory Body (Organismo di Vigilanza 231) and/or the relevant



Subsidiaries' Supervisory Bodies and/or, on their behalf, with Audit Department personnel involved in supporting the Supervisory Body under this Procedure.

To ensure proper handling of internal reports, a dedicated online Portal is available, accessible from the “Whistleblowing” page on the relevant websites (where activated) and from company intranets. The portal allows reports to be submitted, including anonymously—meaning without providing one’s name or contact details—either on one’s own behalf or on behalf of a third party, after reviewing the “Privacy Notice” available in the same section.

Once the report is submitted, the reporter receives a Unique Identification Code (an alphanumeric ticket), along with the submission date. This code allows the reporter to monitor the progress of the report over time while ensuring confidentiality and anonymity. It should be noted that anyone receiving a report is required to maintain confidentiality regarding the identity of the reporter, the individuals involved and/or mentioned in the report, and the content of the report itself.

During its investigation, the Audit Department may request additional information or clarifications from the reporter.

Retaliatory actions against reporters are strictly prohibited. This protection ensures that reporters are safeguarded from any form of retaliation or adverse treatment as a result of reporting unlawful conduct or compliance-related issues. Such protection also extends to anonymous reporters who, after being identified, believe they have suffered retaliation. If it is determined that a reporter has been subjected to retaliatory actions, TIM Group will impose appropriate disciplinary measures on those responsible.

To increase awareness of the reporting process and proper use of the whistleblowing mechanism, TIM provides specific training courses and information sessions for its employees.



For details on how reported violations are handled and for a description of the process from receipt of a report to its resolution, please refer to the “Whistleblowing Procedure” available at the following link: [TIM Whistleblowing Procedure](#)

3. Reporting on Violations

Below is the table showing confirmed cases of violations as of 31.12.24.

Reporting areas	Number of breaches in FY 2024
Corruption or Bribery	0
Discrimination or Harassment	30
Customer privacy data	0
Conflicts of interest	0
Money Laundering or Insider trading	0