INSIGHT INTO CLIMATE-RELATED LOBBYING AND TRADE ASSOCIATIONS

Insight

TIM Group

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1. Our engagement in institutional and industry dialogue

As the TIM Group, we actively collaborate with trade associations on multiple aspects of business and promote moments of direct discussion with policy makers, with the aim of proactively contributing to the evolution of policies, legislation and regulations, with a view to transparency and accountability.

Our approach to lobbying activities is marked by open, positive and constructive dialogue. Even when we express comments or proposed changes, we do so in a collaborative spirit, in the shared interest of the ICT/telecommunications industry and institutions. We avoid polarized or conflicting positions, always favoring a logic of continuous and responsible confrontation.

2. The Group's climate goals and commitments

When we address climate-related issues, we refer to the Group's environmental targets, which are integrated into our Business Plan. Our commitment is clear: to reduce the emission impact of our business units and those in our supply chain to zero, in line with the Paris Agreement and the goal of containing the global average temperature increase to within 1.5°C.

Our climate commitment is based on a broad framework, including:

- globally set targets such as those in the Paris Agreement;

- the Green Deal, launched European Commission, which is the main policy tool for implementing the 2030 Agenda and the UN Sustainable Development Goals and translating global commitments into binding actions;

- the Climate Act (Regulation (EU) 2021/1119), which sets the goal of achieving net zero emissions by 2050, while raising the minimum greenhouse gas emission reduction target to 55 percent by 2030;

- the Directive (EU) 2023/2413 (RED III), which stipulates that the EU should achieve a 42.5 percent share of renewable energy consumption by 2030;

- the "Clean Industrial Deal," an EU plan launched in February 2025 to support businesses in sustainability and facilitate the achievement of climate goals;

- the Taxonomy Regulation 2020/852 and the Climate Delegated Regulation 2021/2139 aimed at identifying sustainablè economic activities on which businesses are assessed for investment attraction.

At the Group level, we translate these commitments into concrete climate change adaptation and resilience strategies, accompanied by environmental performance reporting requirements, applied in all the countries where we operate and in each of our business units.

In Italy, we are implementing energy efficiency measures on our data centers, investing in infrastructure equipped with environmentally friendly cooling systems and

powered by energy from renewable sources. In addition, we ensure full transparency on our greenhouse gas (GHG) offsetting activities carried out outside the value chain, through the purchase of certified carbon credits. This is a key tool in the fight against climate change, as it allows us to offset residual emissions, finance global climate action, promote innovation, support local communitieṡ and contribute to a more sustainable economy.

In this regard, as part of a project to offset emissions from the browsing of major corporate websites related to the Domestic business unit, in 2024 we purchased 522 carbon credits through "The Envira Amazonia Project," a forest conservation initiative in Brazil that aims to protect existing forests and prevent deforestation, thus contributinġ to the avoidance of CO_2 release. In Brazil, we also support certified offset projects. In 2024, we purchased 16,619 carbon credits by investing in an initiative that promotes environmental and social benefits for local communitieṡ.

For more details, please refer to our 2024 Financial and Sustainability Report, particularly the section on "Disclosure Requirement E1-7: GHG removals and GHG emission mitigation projects financed with carbon credits."

3. How we ensure consistency between lobbying and climate strategy

We put in place specific programs to ensure that all our lobbyinġ activities, including those carried out through trade associations in the countries where we operate, are fully aligned with our climate strategy and the goals of the Paris Agreement. When necessary, we activate review and monitoring processes, both for direct lobbying activities and those carried out through associations. Coordination of our public positions vis-à-vis policy makers and trade associations at the Domestic level is provided by the National Institutional Affairs & Trade Associations, European Affairs, and Regulatory Affairs functions and are developed in close collaboration with the executive managers of the areas concerned, such as the Head of the Sustainability function who defines and directs the sustainability strategy or the Procurement Manager who follows energy procurement and property management.

4. Our dialogue with policy makers at the national level

At the national level, we develop our lobbying and institutional confrontation in coordination with the main Italian trade associations, such as Confindustria and Assotelecomunicazioni (ASSTEL). If misalignments emerge between the positions they take and our climate strategy, we intervene with internal actions to foster a realignment consistent with our sustainability goals. In this context, we maintain an active and structured dialogue with associations that can influence, through their positions, the development of policies, laws and regulations with an impact on climate change. We are actively engaged in lobbying activities, including in relation to the National Recovery and Resilience Plan (NRP). Our institutional dialogue involves the ministries responsible for our sector, such as the Ministry

of Enterprise and Made in Italy (MIMIT), and members of the parliamentary committees of the House and Senate. We regularly participate in parliamentary hearings, which provide an opportunity to explore relevant issues and contribute to the legislative debate. In addition, as part of regulatory monitoring, we develop concrete proposals to be included in the measures under discussion in order to support the development of our business from a sustainable perspective.

Confindustria, within which **TIM's CEO serves as the President's Digital Transition Delegate**, plays an active role in promoting environmental sustainability in the Italian production system. Through the "**Sustainability and Transition**" working group, in which TIM is present, measures in favor of decarbonization, energy efficiency and renewable sources are promoted. This engagement allows us to contribute in a structured way to the regulatory and public debate on climate change. We also actively influence the institutional debate through our participation in Assotelecomunicazioni (ASSTEL), where the CEO of TIM, serves as Chairman. This position strengthens our ability to contribute to the definition of positions shared on strategic issues, such as digital investments, energy efficiency and the integration of sustainability in sector policies, in line with the objectives of the digital and environmental transition.

5. Our dialogue with policy makers at the European and international levels

We maintain a structured and ongoing dialogue with European institutions, actively participating in public consultations, workshops, and institutional meetings with representatives of the European Commission, the European Parliament, and member states' permanent delegations. We also collaborate with think tanks and policy platforms, such as the Centre for European Policy Studies and the European Internet Forum, contributing to the development of policies that foster a digital and sustainable transition.

We are closely following the evolution of the **Fit for 55 package**, which brings together 13 legislative proposals aimed at reducing emissions by at least 55 percent by 2030 and achieving climate neutrality by 2050. Among the measures most relevant to our sector, we closely monitor the Energy Efficiency Directive, which identifies ICT as one of the most energy-intensive sectors, with an estimated impact of between 5 percent and 9 percent of electricity consumption and about 2 percent of European emissions. When the Directive was proposed to be redrafted, we alerted regulators to some critical issues related to the requirement to disclose traffic volumes and archived data, pointing out that this information is not always available to operators. Indeed, in many cases, the data are managed and stored directly by customers, making full traceability and sharing complex. We also closely follow European regulatory areas relevant to our industry on sustainability and climate change issues such as:

- the **Taxonomy Regulation** is designed to direct investment toward sustainable economic activities. As the TIM Group, we are actively engaged in European tables to promote the inclusion of fixed and mobile telecommunications infrastructure among taxonomy assets, recognizing its role as a strategic asset for the digital and environmental transition. In particular, we support the recognition of the environmental value of innovative networks, such as fiber optics and 5G, highlighting their positive impact in terms of energy efficiency and enabling the sustainable transformation of productive sectors. We also believe that companies active in sectors with high investment needs, such as telecommunications, should have access to dedicated financial instruments, so as to accelerate the path to alignment with the objectives of the Taxonomy and amplify its systemic impact

- the **"Omnibus" package**, the regulatory intervention, aimed at simplifying sustainability reporting under the Corporate Sustainability Reporting Directive (CSRD) by easing disclosure requirements and making the requirements more accessible to

companies. Our efforts are geared toward contributing to the definition of clear, proportionate KPIs consistent with the characteristics of the technology sector. we also believe it is essential that the benefits provided for SMEs, such as exemption from some obligations, do not generate competitive imbalances, penalizing larger companies that face more extensive obligations.

- the **Telecommunications Code of Conduct for Network and Data Center Energy Efficiency** to which TIM has adhered for years. We see this voluntary technical tool as an established reference for continuous improvement in infrastructure energy efficiency. We believe it is important that industry standards such as this are recognized and valued in the broader European sustainability framework.

Our commitment also translates into active participation in major international trade associations, including Connect Europe (formerly ETNO), which represents fixed and mobile network operators in Europe, and GSMA, which brings together mobile operators globally and is strongly committed to sustainability issues. Within GSMA, our CEO sits on the Board of Directors, while the Head of European Affairs participates in the **Global and Europe Policy Group**, the internal GSMA committee responsible for structuring and coordinating policy positions, at the European and global level, for the mobile sector. On the Climate front, we actively participate in the **"GSMA Climate Action Task Force,"** the furniture industry's main international table dedicated to sustainability that promotes emissions reductions in line with scientific targets to drive the industry toward carbon neutrality by 2050. Through workshops, technical sessions and discussion moments, we contribute to the exchange of best practices, sharing strategies, tools and solutions for energy efficiency and network decarbonization. We are active members of the Global Enabling Sustainability Initiative (GeSI), with which we collaborate to promote the role of ICT in combating climate change, disseminate best practices, and strengthen the integration of digital technologies into national and international climate policies. We contribute to the initiative's annual program, participating in strategic studies such as SMART2020, SMARTer2030 and the upcoming

SMARTer30 - Reloaded, providing our experience and vision to support global sustainability policies. We are members of the European Green Digital Coalition (EGDC), an initiative launched in 2021 with the support of the European Commission and Parliament. As signatories, we are committed to supporting the European Union's dual green and digital transition, advancing our climate neutrality goal to 2040. Within the coalition, we promote the adoption of shared scientific methodologies to measure emissions avoided through the use of ICT solutions in key economic sectors, such as energy, transport, agriculture and construction.

In Brazil, we have also consolidated over time a structured and ongoing dialogue with institutions at all levels: government, Congress, regulatory and antitrust authorities, industry associations and the press. Relations with these interlocutors are based on a frequent and transparent exchange, based on proposals, statements and objective stances, with the aim of contributing constructively to the solution of issues that affect not only our company, but the entire telecommunications sector.