



CLIMATE LOBBYING ACTIVITIES WITHIN INSTITUTIONAL AND ASSOCIATION SETTINGS

Insight

TIM Group

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1. Our Commitment to Institutional and Industry Dialogue

As the TIM Group, we actively collaborate with industry associations on a wide range of business issues and foster opportunities for direct dialogue with policymakers, with the goal of proactively contributing to the development of policies, laws, and regulations, guided by principles of transparency and accountability.

Our approach to lobbying is based on open and constructive dialogue. Even when we offer comments or propose changes, we do so in a spirit of collaboration, in the shared interest of the ICT/telecommunications sector and public institutions. We avoid polarized or confrontational positions, always prioritizing responsible dialogue.

2. The Group's Climate Goals and Commitments

When we address climate-related issues, we have as a point of reference our Group environmental targets, integrated into the Business Plan. Our commitment is clear: to zero the emissive impact of our direct assets and those of our supply chain, in line with the Paris Agreement and with the goal of containing the increase in global average temperature within 1.5°C.

Our commitment to climate is based on a broad framework, which includes:

- globally set objectives such as those of the Paris Agreement;
- the Green Deal, launched by the European Commission, which is the main strategic tool for implementing the 2030 Agenda and the United Nations Sustainable Development Goals and which translate global commitments into binding actions;
- the Climate Law (Regulation (EU) 2021/1119), which sets the target of achieving



net-zero emissions by 2050, while raising the minimum target for reducing greenhouse gas emissions to 55% by 2030;

- Directive (EU) 2023/2413 (RED III), which establishes that by 2030 the EU will achieve a renewable energy consumption share of 42.5% 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 Delegated Climate Regulation 2021/2139 aimed at identifying the sustainable economic activities on which companies are valued for the purpose of attracting investment.
- The “Strategic Roadmap for Digitalisation and AI in Energy” within the “Tech Sovereignty Package”, which aims to optimise the energy consumption of digital technologies while accelerating the European Union's dual green and digital transition.

At Group level, we transform our climate commitments into concrete actions, aimed at reducing environmental impact and making our activities more resilient. We apply common rules to measure and report on environmental results in all countries where we operate and in each of our business units.

In Italy, we are carrying out energy efficiency interventions on our data centers, investing in infrastructure equipped with cooling systems with low environmental impact and powered by energy from renewable sources. Furthermore, we ensure full transparency on our greenhouse gas emission (GES) offsetting activities carried out outside the value chain, through the purchase of certified carbon credits. It is a fundamental tool in the fight against climate change, as it allows us to offset residual emissions, finance global climate action, promote innovation, support local communities, and contribute to a more sustainable economy.

In this regard, as part of a project to offset emissions from browsing major corporate websites related to the Domestic business unit, in 2025 we purchased 505 carbon credits



through "The Envira Amazonia Project," a forest conservation initiative in Brazil that aims to protect existing forests and prevent deforestation, thus helping to prevent the release of CO₂. In Brazil, too, we support certified compensation projects. In 2025, we purchased 13,418 carbon credits by investing in an initiative that promotes environmental and social benefits for local communities.

For further details, we refer to our 2025 Sustainability Report, in particular the section dedicated to «E1-7 Disclosure Requirement: GES Absorptions and GES Emission Mitigation Projects Financed with Carbon Credits».

3. How We Ensure Consistency Between Lobbying and Climate Strategy

The Group has established a management system for its lobbying activities and trade association memberships, defining responsibilities, coordination mechanisms and processes for monitoring their consistency with the Group's climate strategy and the objectives of the Paris Agreement.

We put in place specific programs to ensure that all our lobbying activities, including those carried out through trade associations in the countries where we operate, are fully aligned with our climate strategy and the objectives of the Paris Agreement. The Group regularly reviews and monitors both its direct lobbying activities and the climate-related positions and activities of the trade associations to which it belongs, in order to assess their consistency with the Group's climate strategy and the objectives of the Paris Agreement. In the event of misalignments, we activate engagement and improvement processes aimed at addressing such misalignments and fostering realignment, both for direct lobbying activities and those carried out through trade associations.

The coordination of our public positions towards policy makers and trade associations at Home level is ensured by the functions National Institutional Affairs & Trade Associations, European Affairs, Regulatory Affairs and are developed in close collaboration with the



executive heads of the areas concerned, such as the Head of the Sustainability function who defines and directs the sustainability strategy or the Head of Procurement who follows the energy supply and management of the properties.

4. Our dialogue with policymakers at the national level

At the national level, we develop our lobbying and institutional discussion activities in coordination with the main Italian trade associations, such as Confindustria and Assotelecomunicazioni (ASSTEL). Should 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 that impact climate change.

We are actively engaged in lobbying activities, including in relation to the National Recovery and Resilience Plan (PNRR). Our institutional dialogue involves the Ministries responsible for our sector, such as the Ministry of Enterprise and Made in Italy (MIMIT), and the members of the Parliamentary Committees of the Chamber and the Senate. We regularly participate in parliamentary hearings, which represent an opportunity to explore key issues and contribute to legislative debate. Furthermore, 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 the CEO of TIM serves as the President's Digital Transition Delegate, plays an active role in promoting environmental sustainability in the Italian production system. Through the working group “Sustainability and Transition”, in which TIM is present, measures in favour of decarbonisation, 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 President. This assignment strengthens our ability to contribute to the definition of shared positions on strategic issues, such as digital investment, energy efficiency, and the integration of sustainability into sector policies, in line with the objectives of the digital and environmental transition.

5. Our dialogue with policymakers at the European and international levels

We maintain a structured and ongoing dialogue with the European institutions, actively participating in public consultations, workshops and institutional meetings with representatives of the European Commission, the European Parliament and the permanent delegations of the Member States. 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% by 2030 and achieving climate neutrality by 2050. Among the most relevant measures for our sector, we closely monitor the Energy Efficiency Directive, which identifies ICT among the most energy-intensive sectors, with an estimated impact of between 5% and 9% of electricity consumption and approximately 2% of European emissions.

On the occasion of the proposal to reformulate the Directive, we reported to the regulators some critical issues related to the request to disclose traffic volumes and archived data, highlighting that such information is not always available to operators. In fact, in many cases, data is managed and stored directly by customers, making full



traceability and sharing complex.

We also follow with particular attention European regulatory areas relevant to our sector on sustainability and climate change issues such as:

- the Taxonomy Regulation was designed to direct investment towards sustainable economic activities. As the TIM Group, we are actively engaged in European tables to promote the inclusion of fixed and mobile telecommunications infrastructures among taxonomic activities, recognising their role as strategic assets 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 production sectors. We also believe that companies operating in sectors with high investment needs, such as telecommunications, should be able to access dedicated financial instruments, thus accelerating their alignment with Taxonomy objectives and amplifying their systemic impact.
- the package “Omnibus”, the regulatory intervention, aimed at simplifying sustainability reporting under the Corporate Sustainability Reporting Directive (CSRD), easing information requirements and making requirements more accessible for businesses. Our commitment is geared towards contributing to the definition of clear, proportionate KPIs consistent with the characteristics of the technology sector. We also believe it is crucial that the expected benefits for SMEs, such as exemption from certain obligations, do not generate competitive imbalances, penalising larger firms facing more extensive obligations.
- the Telecommunications Code of Conduct for the Energy Efficiency of Networks and Data Centers to which TIM has adhered for years. This voluntary technical tool represents for us a consolidated reference for the continuous improvement of the energy efficiency of infrastructure. We believe it is important that



industry standards such as this are recognised and valued within the wider European sustainability framework.

- The “Strategic Roadmap for Digitalization and AI in Energy” within the “Tech Sovereignty Package” defines a series of actions between 2026 and 2028 to create an interconnected digitalized system, aimed at increasing electrification and clean energy integration, with a key role played by Artificial Intelligence tools. The Roadmap is a complement to the “Cloud and AI Development Act (CADA)” aimed at creating the right conditions to incentivise large investments in cloud and edge capacity in Europe.

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 the GSMA, our Chief Executive Officer sits on the Board of Directors**, while the Head of the European Affairs function participates in the Global and Europe Policy Group, the internal GSMA committee responsible for structuring and coordinating policy positions, at European and global levels, for the mobile sector.

On the Climate front, we are actively participating in the “**GSMA Climate Action Task Force**”, the leading international mobile sector table dedicated to sustainability that promotes emissions reductions in line with scientific targets to guide the sector towards carbon neutrality by 2050. Through workshops, technical sessions, and discussion sessions, we contribute to the exchange of best practices by sharing strategies, tools, and solutions for energy efficiency and grid decarbonization.

We are active members of **GeSI (Global Enabling Sustainability Initiative)**, with which we collaborate to promote the role of ICT in combating climate change, disseminate good 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 Commission and the European Parliament. As signatories, we have committed to supporting the European Union's dual green and digital transition, bringing forward our climate neutrality goal to 2040. Within the coalition, we promote the adoption of shared scientific methodologies to measure avoided emissions through the deployment of ICT solutions in key economic sectors, such as energy, transport, agriculture and construction.

In Brazil, too, we have 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 positions, with the aim of contributing constructively to the solution of issues that affect not only our company, but the entire telecommunications sector.

6. Policy contributions and associations

6.1 Annual Contributions (euro)

The TIM Group does not provide any political funding, including political funds, election funds for specific political groups, and lobbying funds for political parties. The TIM Group contributes to the development of public interest by supporting organizations with guaranteed political neutrality. In addition, TIM supports public policies that promote job creation, gender equality, and anti-corruption regulations.

	2021	2022	2023	2024	2025
Local, regional, or national political campaigns/organizations/candidates ¹	0	0	0	0	0

¹ Political and lobbying donations: donations and support to lobbying organizations or lobbyists, political campaigns, organizations, or politicians linked to specific parties or policies



Lobbying, interest representation, or similar activities ¹	0	0	0	0	0
Trade associations or tax-exempt groups (e.g., think tanks) ²	3,695,771	3,470,575	3,370,229	1,687,112.84	1,875,069.27
Other (e.g., expenses related to electoral measures or referendums)	0	0	0	0	0
Total contributions	3,695,771	3,470,575	3,370,229	1,687,112.84	1,875,069.27
Coverage (as a percentage of denominator, indicating the organizational scope of the reported data) percentage of: Revenues of TIM SpA (italian business)	100	100	100	100	100

² Association expenses: the largest membership fees for institutions related to telecommunications policy with guaranteed political neutrality.



6.2 Main expenses for the associations 2025 (euro)

Association name	Expenses
Confindustria ³	€1,602,079.27
Connect Europe	€191,816.00
GSMA	€205,967.00
EIF	€7,333.00
GRUPPO INIZIATIVA ITALIANA	€750.00
Total expenses	€2,007,945.27
Note: Confindustria System = Confindustria + ASSTEL + ASSINFORM + AIAD, relating to TIM SpA only	

Topic or subject	Company position	Description	Total spent 2025 (Euros)
GSMA Industry organization representing the interests of mobile telecommunications operators worldwide	Member	TIM's Chief Executive Officer is a member of the GSMA Board of Directors. TIM is involved in several working groups. The most significant are: • “Strategy Group”: provides advice to the Board on issues of strategic value to the technology sector. Its purpose is to provide guidance on technology evolution, on the approval of all reference technical documents published by GSMA, on ensuring all technical outcomes of GSMA's programs and working groups, and on conducting and coordinating relations with relevant standardization bodies and technical forums; • “Policy Group”: handles advocacy of key industry strategies with the appropriate stakeholders (e.g., EC/UN/...); • “Technology Group”: responsible for outlining the technical evolution of platforms and services (5G); • “Industry Specification Approval Group”: guides the development of new specifications for emerging technologies.	€205,967.00
CONFINDUSTRIA Digital Transition Technical Group Confindustria is the leading association representing manufacturing companies and service companies in Italy	President and Member	• In 2025, TIM carried out a number of projects related to digital transition and the telecommunications sector, collaborating with other Confindustria members. These activities did not involve any additional monetary contribution.	€0.00

³ Confindustria System: Confindustria + ASSTEL + ASSINFORM + AIAD, relating to TIM SpA