



HUMAN RIGHTS

Insight

TIM Group

September 2026



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1. HUMAN RIGHTS ASSESSMENT

Over the past 3 years, the TIM Group has carried out an assessment of potential human rights issues that could affect its business. Below is the table summarizing the activities assessed.

2025			
Category	A. % of total assessed in last three years	B. % of total assessed (column A) where risks have been identified	C. % of risk (column B) with mitigation actions taken
Own operations (including joint ventures where the company has management control)	100	24	100
Contractors and Tier 1 suppliers (as a % of contractors or Tier 1 suppliers)	100	9	100
Joint Ventures (including stakes above 10%) (as a % of joint ventures)	100	18	100

Human Rights Assessment

The human rights assessment covers the Group's own operations and value chain, including contractors and Tier 1 suppliers, as well as relevant business relationships, including joint ventures. The human rights risk mapping is subject to systematic periodic review and is updated whenever significant changes in the Group's activities, value chain, business relationships or operating context may affect the human rights risk profile.

The assessment considers actual and potential human rights issues, including forced labor, human trafficking, child labor, freedom of association and the right to collective bargaining,



discrimination and harassment, as well as other relevant issues related to working conditions, health and safety, privacy and data protection.

In identifying and assessing actual and potential human rights impacts, particular attention is given to groups that may be more exposed or vulnerable to adverse impacts, including own employees, women, children and young people, migrant workers, third-party employees and workers in the value chain, and local communities. Other potentially vulnerable groups are considered relevant, depending on the specific operating context, activities and business relationships.

2. MITIGATION AND REMEDIATION ACTIONS

In order to prevent, mitigate, or remedy potential negative impacts related to the protection of human rights, over time we have undertaken a series of initiatives and actions, such as:

- the adoption of a comprehensive body of policies, updated and expanded over the years, covering policies, principles, and approaches for managing human rights-related issues;
- mitigation plans for human rights violations covering 100% of all Group sites, i.e., both of the Group's business units (Domestic and Brazil);
- the implementation of human rights due diligence processes, both in Italy and in Brazil;
- the establishment of a Whistleblowing portal for reporting concerns;
- with regard to harassment, the adoption, in Italy, of external support channels for individuals following reports made directly by the person concerned, without company intermediation, such as:
 - **Person of Trust:** an external professional the employee can turn to for advice on what happened or for help interpreting incidents and deciding how to respond;
 - **Legal Advisory Service:** external lawyers and/or experts the affected employee can turn to for legal guidance and to learn about the legal tools available;



- **Psychological Support Line:** anonymous and confidential telephone-based psychological support for men and women.

For further details on the mitigation actions and remedy processes implemented by the TIM Group in connection with impacts related to the protection of human rights, please refer to “Disclosure Requirement S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions.”

In addition, the Group has defined specific remedy actions for violations related to cases of discrimination and harassment (sexual and non-sexual), providing, in less severe cases, for example, training and awareness-raising activities and the imposition of fines, and, in the most severe cases, termination of employment, in line with the provisions of the CCNL (National Collective Bargaining Agreement). The Group discloses any identified cases and the related remedy actions taken as part of Disclosure Requirement S1-17, reported within the [2025 Group Financial Report](#).

With regard to suppliers, we include standard clauses in contracts that require suppliers to comply with TIM's Code of Ethics as well as specific ESG clauses relevant to the product or service purchased.

In both cases, failure to comply with human rights principles results in termination of the contract.

Finally, the effectiveness of the Group's processes for protecting human rights is demonstrated by the low number of reports received and by the increase in audit and oversight activities on suppliers and the supply chain.

For further details on the complaints received during 2025, please refer to the [2025 Group Financial Report](#), in particular the sections titled “Disclosure Requirement S1-3 – Processes for remediating negative impacts and channels for own workforce to raise concerns,” “Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts,” and “Disclosure Requirement S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities



related to value chain workers, and effectiveness of those actions,” in particular the paragraph on “Audits and controls on suppliers and the supply chain.”