



RESPONSIBLE ARTIFICIAL INTELLIGENCE PROGRAM

Insight

TIM Group

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1. Responsible Artificial Intelligence Program

The TIM Group has established a governance framework for the responsible development and use of Artificial Intelligence, ensuring that AI systems are designed, implemented, and monitored in compliance with ethical principles, applicable regulations, human rights, and the Group's sustainability objectives.

During 2025, the Group further strengthened its AI governance model through the adoption of dedicated Artificial Intelligence Guidelines, the establishment of an AI Steering Committee, and the implementation of structured governance processes, in order to ensure that AI initiatives remain aligned with the Group's strategy, applicable legislation (including the EU AI Act), and the principles of responsible innovation. The Artificial Intelligence Guidelines are approved by the Board of Directors, which exercises strategic oversight of the Group's Artificial Intelligence program, ensuring alignment with the corporate strategy, the governance system, and sustainability objectives.

The Artificial Intelligence Guidelines also clearly define the permitted uses as well as those that are prohibited or subject to specific restrictions, establishing the boundaries within which AI systems may be designed, acquired, implemented, and used within the Group. AI applications must comply with applicable legislation, including the GDPR and the EU AI Act, and must respect fundamental rights throughout their entire life cycle.

In this context, in order to ensure responsible use and development of AI, the governance framework explicitly prohibits or restricts the development or use of solutions that could violate fundamental rights, including unlawful surveillance, facial recognition, or other high-risk practices that do not comply with the applicable regulatory framework. For this reason, human oversight is embedded at every stage of the AI life cycle, so that automated systems remain under effective human control and critical decisions can always be reviewed by qualified personnel.

The Group promotes transparency and awareness in customer interactions involving Artificial Intelligence. In keeping with the principles of transparency and clarity set out in its



AI Guidelines, TIM clearly identifies, where applicable, interactions, content, and decisions that are generated or supported by AI.

These principles also apply to customer-facing AI services, where TIM explicitly identifies its virtual assistant "Angie" as "TIM's Virtual Assistant," ensuring that users are fully aware they are interacting with an Artificial Intelligence-based system and not with a human operator.

In line with this approach, and in application of the principles of human oversight and accountability set out in the Guidelines, the Group provides its stakeholders with appropriate channels for assistance, complaint management, and reporting, through which they can request clarification or report any service-related issues, including those attributable to the use of Artificial Intelligence systems. Reports are handled by the relevant corporate functions in accordance with the Group's governance and accountability processes.

In addition, the Group promotes the responsible adoption of Artificial Intelligence also through initiatives aimed at improving the environmental efficiency of its digital infrastructure. AI solutions are implemented as part of a broader strategy focused on developing highly energy-efficient data centers, increasing the use of electricity from renewable sources, and continuously optimizing ICT infrastructure.

During 2025, TIM significantly strengthened its AI literacy program to promote the responsible and effective use of Artificial Intelligence across the organization.

The Group completed the "AI Carpet" program, launched AI awareness initiatives accessible to all employees, expanded its AI training catalog, introduced the "Playmaker" management program, and created the "AlInnovation Hub" community, made up of AI ambassadors tasked with promoting the culture, knowledge, and informed adoption of Artificial Intelligence technologies within the organization, and continued training dedicated to privacy, cybersecurity, regulatory compliance, and the responsible adoption of AI. In addition, the Group made corporate Generative Artificial Intelligence platforms available to a



broad community of testers, encouraging their use within a governed and secure environment. This approach made it possible to concretely assess benefits, usage methods, and use cases, laying the groundwork for the progressive and informed adoption of AI solutions across the company. For more information on AI-related training courses, please refer to page 210 of the 2025 Annual Financial Report.

In addition to internal initiatives, TIM also promoted external AI training through programs such as “Opening Future” and “HighEST Lab,” developed in collaboration with universities and technology partners.

Finally, it should be noted that the governance framework supporting the responsible use of AI operates within the scope of management systems independently certified according to internationally recognized standards.

The Group has externally certified management systems, including:

- ISO 9001 (Quality Management System);
- ISO/IEC 27001 (Information Security Management System);
- ISO 14001 (Environmental Management System);
- ISO 14064 (Greenhouse Gas Emissions Verification).

These certifications provide independent assurance regarding key organizational processes related to governance, security, quality, environmental management, and information protection in support of AI-based services.