



# SUSTA INABI LITY REPORTING

PURSUANT TO ITALIAN LEGISLATIVE DECREE 125/24

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## SUSTAINABILITY REPORT PREPARED IN ACCORDANCE WITH LEGISLATIVE DECREE 125/24

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# 1. GENERAL INFORMATION

## Basis for preparation

### Disclosure Requirement BP-1 – General basis for preparation of sustainability statements

**[5 a]:** The TIM Group's Sustainability Report is drawn up in accordance with the Corporate Sustainability Reporting Directive (CSRD), transposed into Italian law by Legislative Decree 125/2024. The reporting is carried out in line with the European Sustainability Reporting Standards (ESRS) and includes in the "Environment" section the information required pursuant to Article 8 of the EU Taxonomy and related delegated acts. The TIM Group's Sustainability Report was prepared on a consolidated basis and was approved by the Board of Directors ("BoD") on March 5, 2025.

**[5 b i, ii]:** The TIM Group's Sustainability Report presents data and information relating to the company TIM S.p.A. and its subsidiaries consolidated on a line-by-line basis as of December 31, 2024, as presented in the TIM Group's Consolidated Financial Statements.

**The 2024 Sustainability Reporting takes into account the spin-off of the NetCo business** into FiberCop S.p.A. and Optics BidCo S.p.A.'s purchase of TIM S.p.A.'s entire stake in FiberCop on July 1, 2024. In light of the above, NetCo's performance for the first six months of 2024 is reported in Section 5 of this Report, as referenced in the 'Metrics and Targets' paragraph of each chapter.

The scope of the Sustainability Reporting coincides with that of the Group's consolidated financial statements, with the specifics noted below.

#### Perimeter and calculation methods - Environment

For the environmental data, starting from the boundary of the consolidated financial statements of the Domestic BU's half-year 2024, as a result of the boundary changes that occurred in July 2024, companies that met at least one of the following significance criteria were included:

- 0.5% of total turnover (€000);
- 0.5% of the total number of employees (no.);
- 0.1% of total expenditure on energy and fluids (€000).

Based on these criteria, the following 11 Group companies are included in the environmental perimeter: TIM S.p.A., TIM Sparkle Italia, TIM Sparkle Grecia, TIM Sparkle Turchia, Panama Digital Gateway, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TIM S.A.

In the document, the term Domestic BU (or Domestic) is used in some disclosure requirements regarding the environment in order to refer to companies in the environmental perimeter excluding TIM S.A.

#### Perimeter and calculation methods - Social

For workforce data, all Group companies in which at least 1 employee works are considered, in a similar way to the consolidated financial statements, i.e.: TIM S.p.A., TIM Sparkle Italia, Noovle S.p.A., Noovle Malta, Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies, TS Way, QTI S.r.l., Mindicity, le società estere controllate da TIM Sparkle, TIM San Marino, Telefonia Mobile Sammarinese, TIM S.A., TIM Finance and TIM Capital.

In the document, the term Domestic BU (also Domestic) is used in some ESRS disclosure requirements dealing with "Social" topics to refer to the companies in the perimeter mentioned above, excluding TIM S.A., TIM Finance and TIM Capital.

For some specific datapoints related to the ESRS S1 "Own workforce" reporting requirement, separate data evidence is required by country according to a specific materiality criterion (50 or more employees representing at least 10% of the total number of employees in the Group). In these cases, the application of the criterion reports to the Group companies present in Italy and Brazil. The companies included in the "Italy" perimeter are: TIM S.p.A., TIM Sparkle Italia, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies, TS Way, QTI S.r.l., Mindicity. The company considered in the "Brazil" perimeter is TIM S.A.

**[5 c]:** TIM Group Sustainability Reporting provides a view of the value chain, including, where possible, the actors involved both upstream and downstream.

This approach is first used in the materiality analysis of impacts, risks and opportunities (hereafter also referred to as "IRO") where it is specifically indicated whether these refer to TIM's activities or its value chain (cf. "Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model). In addition, some metrics already integrate value chain information, such as in the calculation of Scope 3 greenhouse gas emissions.

As for policies, objectives and initiatives, whenever they involve actors in the value chain, this aspect is explained in the corresponding sections.

For other metrics related to the value chain, the TIM Group has chosen to postpone the preparation of a data collection plan until later years, in line with the phase-ins required by ESRS.

**[5 d]:** In the Sustainability Report, the TIM Group has not omitted any sensitive information regarding patents, intellectual property, know-how or innovation results to protect its competitive advantages.

[5 e]: The TIM Group communicates all sensitive information that may influence the market or its shareholders, such as financial news, substantive changes or other issues that are under negotiation or development and that are not yet defined. Therefore, it does not take advantage of the exemption from reporting information concerning upcoming developments or issues under negotiation.

## Disclosure Requirement BP-2 – Disclosure in relation to specific circumstances

[9 a, b]: When reporting information related to sustainability issues, the TIM Group considers the time horizons that are in line with those adopted in the Enterprise Risk Management field. Specifically:

- short term: 1 year;
- medium term: from the end of the short-term reference period up to three years;
- long term: more than three years.

This choice differs from the time horizons defined by ESRS 1- 6.4 "Definition of short, medium and long term for reporting purposes," but reflects the reference period adopted in the Group's financial statements and strategic planning.

[10 a, b, c, d], [11 a], [11 b i,ii]: On July 1, 2024, TIM S.p.A. completed the spin-off of the NetCo business into FiberCop S.p.A., which was already operating the fiber and copper secondary network. At the same time, Optics BidCo S.p.A. purchased TIM S.p.A.'s entire stake in FiberCop. A transaction agreement governed the contractual terms between the new entity "NetCo" (FiberCop S.p.A.) and TIM S.p.A.

As a result of this transaction, **Sustainability Reporting considers TIM Group activities excluding NetCo**, as if the separation had taken place on January 1. To represent 2024 as the base year:

- NetCo's environmental and social metrics for the period from January 1 to June 30, 2024 were identified and unbundled;
- estimates were made to identify TIM consumption data related to buildings used by TIM staff and colocation infrastructure, for which detailed data were not available from the external owner.

The Group then used estimates for metrics related to waste for disposal, average employee size by gender by contract type, and average bill payment times. The forward-looking information was developed from assumptions and estimates regarding future events and possible actions that the Group may take. Further details on the metrics are covered in the reference paragraphs. Furthermore, with regard to the calculation of Scope 3 GHG emissions presented in Chapter "2. Environmental Information", it should be noted that estimated data related to activities carried out along the TIM Group's value chain (both upstream and downstream) have been used, and that these calculations are based on assumptions and third-party sources.

In addition, where permitted by Appendix C of ESRS 1, the Group has used a phased-in process for implementing certain metrics that require additional data or complex collection systems (phase-in) with a commitment to full coverage by the regulatory deadlines.

Financial resources in terms of significant operating expenditures (OpEx) and capital expenditures (CapEx) are reported in the description of the actions. For some actions, however, it is not possible to provide such values due to the non-unique nature of the expenses (indirect costs, shared costs, intercompany costs). In addition, for each share, the exact detail between OpEx and CapEx and individual items in the TIM Group's consolidated income statement is not available, although, based on the nature of the shares, the expenses can be traced to the following notes to the consolidated financial statements.

### CapEx

#### No. 5 Intangible assets:

- Industrial patents and intellectual property rights
- Concessions, licenses, trademarks and similar rights
- Intangible assets with a finite useful life
- Work in progress and advance payments

#### No. 6 Tangible assets:

- Land
- Buildings (civil and industrial)
- Plant and equipment
- Manufacturing and distribution equipment
- Other
- Construction in progress and advance payments

## OpEx

### No. 28 Purchases of materials and services:

- Purchase of raw materials and goods
- Costs of services
  - Revenues due to other TLC operators
  - Costs for telecommunications network access services
  - Commissions, sales commissions and other selling expenses
  - Advertising and promotion expenses
  - Professional and consulting services
  - Energy consumption
  - Maintenance costs
  - Outsourcing costs for other services
  - Mailing and delivery expenses for telephone bills, directories and other materials
  - Other service expenses
- Lease and rental costs:
  - Rent and leases
  - TLC circuit subscription charges
  - Other lease and rental costs

### No. 29 Employee benefits expenses:

- Ordinary employee expenses:
  - Wages and salaries
  - Social security contributions
  - Other employee benefits
- Costs and provisions for agency contract work
- Other expenses for employees and other labor-related services rendered:
  - Expenses for corporate restructuring and termination benefit incentives
  - Other

In this regard, it is specified that the Group has initiated a more specific data collection and monitoring process for the upcoming reporting cycles.

**[13 a], [14c]:** Sustainability Reporting considers TIM Group's activities excluding NetCo, i.e., as if the transaction to contribute the secondary fiber and copper network to FiberCop had taken place on January 1. The aim is to establish a new reference base year to evaluate the achievement of the objectives of the Business Plan. NetCo's significant activities for the first half of the year are included in a specific section.

The significant change in the operating perimeter, both in terms of the size of infrastructure assets and personnel, no longer allows for the comparison of emission performance with previous years, requiring a new baseline to monitor progress. Because of this discontinuity within the document **it is not possible to provide comparative information on activities with respect to previous years.**

In addition, the development of a new Transition Plan is required, which will involve re-validation of the environmental objectives by SBTi, as required by the corporate climate action organisation's recommendations in similar situations (for details see the E1-1 disclosure requirement "Transition plan for climate change mitigation").

**[15]:** The TIM Group includes in its Sustainability Report information required by other generally accepted regulations or provisions, in addition to those prescribed by the ESRS and, in the case of partial application of other principles, provides precise references to the paragraphs applied.

**[16]:** When TIM includes information by reference, it indicates the reference to the ESRS disclosure requirement or specific elements (e.g. see ESRS disclosure requirement 2 GOV-3 "Integration of sustainability-related performance in incentive schemes").

## Governance

### Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies

**[21 a]:** On April 23, 2024, the Shareholders' Meeting appointed the **Board of Directors** for the three-year period 2024-2026, consisting of **an Executive Director** (the CEO, who is also given the position of General Manager) **and eight non-executive directors** (including the Chairman of the Board of Directors).

As of December 31, 2024, the Board of Directors maintains the above-mentioned structure.

The Shareholders' Meeting also renewed the **Board of Statutory Auditors**, made up of **five standing auditors**, including the Chair, and 4 alternate auditors.

In the appointment of the Statutory Auditors, Article 17 of the Articles of Association was applied, which provides for the presence of five standing auditors and of four alternate auditors.

As of December 31, 2024, the Board of Statutory Auditors maintains the above-mentioned structure.

**[21 b]:** The TIM Group does not provide for trade union representation within the administrative, management and supervisory bodies.

**[21 c]:** The members of the Board of Directors have adequate skills in the sector and in the geographical areas in which the company operates.

In view of the Board's renewal, an orientation to shareholders was published on January 18, 2024, stressing the importance of selecting high-profile candidates.

The table below summarizes the composition and expertise of the Board members, which are cross-cutting to the sustainability issues and relevant IROs that emerged from the double materiality analysis, particularly with regard to digital technologies and business conduct.

#### **[21 c]: Composition and responsibilities of the Board of Directors**

	Age	Languages	Digital TLC Technology	Finance (M&A) Risk Audit	Corporate Governance Legal	Management experience in other sectors	Experience as a director in listed companies	International experience
Domitilla Benigni	50-60	IT-EN	X				X	X
Paola Camagni	50-60	IT-EN-FR		X			X	
Federico Ferro Luzzi	50-60	IT-EN			X		X	X
Alberta Figari	>60	IT-EN			X		X	X
Paola Giannotti De Ponti	>60	IT-EN-FR-ES		X		X	X	X
Giovanni Gorno Tempini	>60	IT-EN		X			X	X
Pietro Labriola	50-60	IT-EN-PT	X				X	X
Umberto Paolucci	>60	IT-EN	X			X	X	X
Stefano Siragusa	<50	IT-EN	X			X	X	X

The following table summarizes the competency matrix of the members of the Board of Statutory Auditors. The Board of Statutory Auditors periodically evaluates the professional requirements of its members. In 2024, the self-assessment confirmed that the composition of the supervisory body is balanced and diversified in terms of professional skills and training.

#### **[21 c]: Composition and responsibilities of the Board of Statutory Auditors**

	Age	Languages	Digital TLC Technology	Finance (M&A) Risk Audit	Corporate Governance Legal	Management experience in other sectors	Experience as a director in listed companies	International experience
Francesco Fallacara	50-60	IT-EN		X	X			X
Anna Doro	50-60	IT-EN		X	X			X
Massimo Gambini	>60	IT-EN		X	X			X
Mara Vanzetta	50-60	IT-EN		X	X			X
Francesco Schiavone Panni	>60	IT-EN		X	X			X

**[21 d]:** In the selection of members of the TIM Group's Board of Directors and Board of Statutory Auditors, any form of discrimination in terms of ethnicity, nationality, country of origin, gender, sexual orientation, religion, political opinion or other nature is excluded. The Group actively promotes the presence of women on the Board to ensure more balanced governance and an appropriate variety of perspectives and skills among members. In addition, in the appointment of the Directors, Article 9.1 of the Articles of Association was applied, which provides for the presence of representatives of the least represented gender in an amount equal to at least

two-fifths of the total. Indeed, the female representation on the Board consists of four members; the male representation is five.

In 2024, the **Board of Directors of the TIM Group** was made up of **44% women** and 56% men. As for the Board of Statutory Auditors, the female composition is 40%, while the male composition is 60%. Of the five Standing Auditors, three are male and two are female, and of the four Alternate Auditors, two are male and two are female.

**[21 e]:** In the TIM Group Board of Directors, **67% of the directors** (i.e., 6 out of 9) **have the independence requirement**. In particular, the Directors Benigni, Camagni, Ferro Luzzi, Figari, Giannotti De Ponti and Paolucci are independent pursuant to Article 148 of the TUF and the Corporate Governance Code; the Director Siragusa qualifies as independent pursuant to Article 148 of the TUF.

**[22 a]:** The Board of Directors plays a role of strategic guidance and supervision, pursuing the main objective of creating value for shareholders in the medium-long term, also taking into account the legitimate interests of the other stakeholders, with a view to the sustainability of the business. In carrying out its role, the BoD is supported by **four board committees** with advisory, proposal, monitoring and investigative functions: the **Control and Risk Committee, the Nomination and Remuneration Committee, the Related-Parties Committee and the Sustainability Committee**. Each Committee has its own regulations that describe the composition and methods of appointment of the members and operating rules.

**The Sustainability Committee, established in April 2021** and chaired by the Chair of the Board of Directors, oversees positioning, objectives, processes and initiatives in the field of environmental, social and governance (ESG) sustainability, interacting with:

- the Nomination and Remuneration Committee, for the inclusion of ESG objectives in the Company's remuneration policy as well as for the adoption of measures to promote equal treatment and opportunities between genders within the company;
- the Control and Risks Committee for the analysis of double materiality, namely the ESG impacts, risks and opportunities material to the company based on the Sustainability Report.

The Board of Statutory Auditors exchanges material information with the Control and Risks Committee and with the Sustainability Committee for the performance of its tasks. This interaction is also functional to the activity of verifying the consistency of the Sustainability Report with respect to the regulatory provisions of reference, strategic objectives and company policies indicated in the business plans.

The Board of Statutory Auditors ensures that the Sustainability Report contains information regarding the impact of the company's activities on the environment, people and governance, and the way in which the risks and opportunities deriving from sustainability issues may affect the company's economic and financial performance. To this end, the Chairman of the Board of Statutory Auditors, or another designated Auditor, participates in the work of the Control and Risk Committee and other Board committees, with the right for other Auditors to attend meetings.

The integration of sustainable practices into business operations is entrusted to the Corporate Communication & Sustainability Department, reporting directly to the Chief Executive Officer. Within this structure, the "Sustainability" function defines, in collaboration with the competent business functions, the governance and coordination of the Group's ESG Plan and related targets, social and environmental sustainability initiatives, draws up the Sustainability Reporting and oversees the sustainability indices/ratings.

Within the Group, TIM S.A. also has its own governance structure with four board committees to support the Board of Directors.

Sustainability issues are managed by the Corporate Communication & Sustainability Department and, at the strategic level, by the ESG Committee, which interacts with the Compensation Committee and the Audit and Risk Committee of the Brazilian subsidiary.

**[22 b]:** **TIM's System of Internal Control and Risk Management (ICRMS)** is fundamental to the Group's organization. It includes various actors working in a coordinated way according to their responsibilities. Composed of rules, procedures, and organizational structures, the SCIGR identifies, measures, manages, and monitors major risks, ensuring sound management consistent with the company's objectives, in accordance with the TIM Group Code of Ethics and Conduct and the Self-Regulatory Principles.

The ICRMS is divided into **three levels of control** and is applied at a Group level, taking into account specific, individual operational aspects:

- **the first level** consists of management that identifies, monitors and evaluates impacts, risks and competence opportunities, defines the mitigation actions and ensures the proper conduct of Operations. In the ESG field, the Sustainability function identifies and assesses the extent of relevant sustainability impacts, risks and opportunities with the Risk Management, Compliance and Finance functions;
- **the second level** is represented by the Enterprise Risk Management, Health & Safety, and Compliance Departments, which define, evaluate, and monitor risk measurement methodologies and provide support to management in defining and mitigating risks;
- **the third level of control** is provided by the Audit Department, which independently and impartially assesses the adequacy of the design of the operation of the control system, including through audit activities on the first and second levels.

The Board of Directors of TIM plays a governance role within the internal control system, considering its function of steering and assessing the adequacy of the System. Specifically:

- it defines the Internal Control and Risk Management System Guidelines;
- it approves the Group's Code of Ethics and Conduct and the Organization, Management and Control Model pursuant to Legislative Decree 231/01.



- it establishes the Control and Risk Committee, comprising Board Members, that supports the Board in carrying out assessments and taking decisions relating to the ICRMS, as well as other committees (Nomination and Remuneration Committee, Sustainability Committee and Related Parties Committee) with advisory functions, described in TIM's Corporate Governance Principles and in the specific regulations;
- it verifies the appropriateness, effectiveness and proper functioning of the ICRMS, so that the main business risks, including those related to material issues, are correctly identified, monitored and managed over time. To this end:
  - it assesses the adequacy and effectiveness of the ICRMS each half-year, with respect to the characteristics of the Company and the risk profile undertaken, also considering the outcomes of the assessment carried out by the Audit Department based on contributions received from the other control functions (Assurance Providers);
  - it defines the level and type of risk that the company is able to assume, in line with long-term strategic objectives (so-called Risk Appetite).

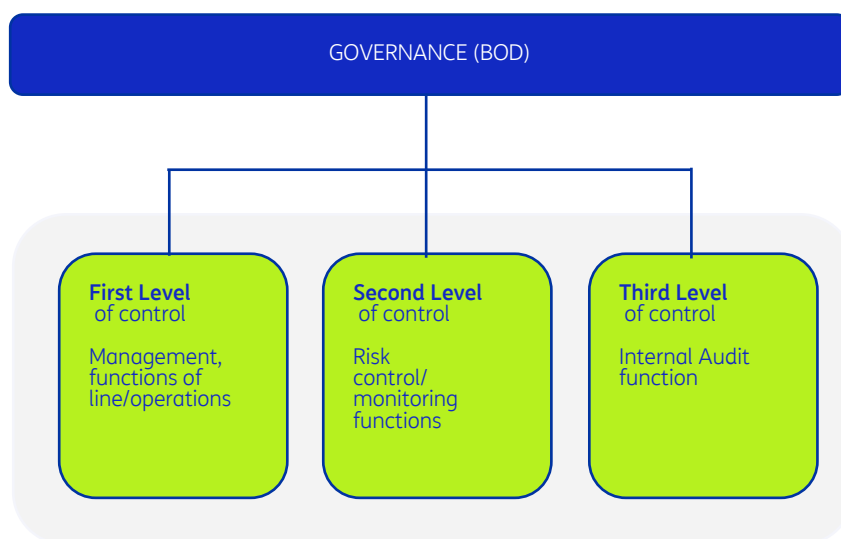
Management of the ICRMS is entrusted to the Chief Executive Officer, the Financial Reporting Officer and the Sustainability Officer, each within their respective areas of responsibility, to ensure the adequacy and functionality of the System from a risk-based perspective.

In September 2022, TIM's Board of Directors created the **ICRMS Steering Committee**, headed by the CEO, to identify, define, and monitor initiatives to improve the company's Internal Control and Risk Management System, based on an integrated analysis of the activities carried out by the control functions and other corporate functions.

On September 27, 2023, the TIM Board of Directors approved, after the opinion of the Control and Risks Committee, the **"Guidelines of the TIM Group's Internal Control and Risk Management System"** ("ICRMS Guidelines") that define the architecture of the ICRMS, the main corporate roles and responsibilities in the field of ICRMS, the coordination methods and information flows between the parties involved, the periodic evaluation process of TIM's ICRMS.

The Board of Statutory Auditors plays a key role in ensuring the effectiveness of the ICRMS, in line with the Corporate Governance Code. It receives information necessary to carry out its supervisory duties, including Audit Reports and periodic reports from the Audit Department, and has the authority to request the Audit Department to prepare timely reports on events of special significance.

The TIM Group's ICRMS can be summarized by the following diagram:



**[22 d] [G1 GOV-1, 5 a]:** The TIM Group Board of Directors guides, coordinates, monitors and reviews corporate strategy and governance to create long-term value. It oversees compliance with the ethical and social responsibility principles of the Code of Ethics and Conduct, promoting a culture based on integrity, transparency and respect for human rights, and ensuring compliance with applicable regulations.

Here are some of its main functions:

- it defines the corporate governance system and the structure of the Group;
- it sets the company's strategic direction by reviewing and approving the Group's strategic, industrial, financial and sustainability plans, prepared by the CEO, and periodically monitoring their implementation;
- it analyzes business and financial performance to ensure the Company's profitability and sustainability, evaluating the management of the Group and strategic Subsidiaries, relying on information from the CEO and comparing results with planned results;



- it defines the guidelines of the Internal Control And Risk Management System, verifying its adequacy and operation, ensuring that key business risks are properly identified, monitored and managed;
- it periodically evaluates, with the support of the Sustainability Committee, the progress achieved with respect to the goals defined in the sustainability plan and proposes corrective actions if necessary;
- it approves, at least once a year and after consulting the Control and Risk Committee, the Plans of the Compliance and Audit Departments;
- it is responsible for transparency in financial and non-financial communications to investors;
- it appoints the members of the Supervisory Body pursuant to Legislative Decree 231/2001 ("231 Supervisory Body"), after hearing the opinion of the Control and Risk Committee and the Board of Statutory Auditors;
- it approves the Group's Code of Ethics and Conduct and the Organization, Management and Control Model pursuant to Legislative Decree 231/01.

Members of the administrative management and supervisory bodies possess adequate expertise in business conduct (see disclosure requirement GOV-1 paragraph 21c of this section).

**[23 a, b]:** The **five Directors on the Sustainability Committee** possess diverse skills and experience, ensuring cross-cutting coverage of sustainability issues and an effective assessment of the Company's relevant ESG impacts, risks and opportunities:

- **Alberta Figari:** Chair of the Board of Directors and Chair of TIM's Sustainability Committee, she has consolidated experience on board committees of listed groups including Assicurazioni Generali S.p.A., where she served as Chair of the Control and Risks Committee and, for individual three-year terms, also the role of Chair of the Related Parties Committee and member of the Nomination and Remuneration Committee. These skills are crucial for monitoring sustainability issues, especially in financial risk management and regulatory compliance;
- **Pietro Labriola:** Chief Executive Officer and General Manager of the TIM Group since 2022, he has 30 years of expertise in the TLC sector first in TIM S.A. since 2015 as Chief Operating Officer and then since 2019 as a Director, acquiring a deep understanding of industrial and strategic dynamics related to digital transformation and environmental sustainability. Before joining TIM, Labriola worked at Infostrada, as business development and marketing director and held positions in Boston Consulting Group, Cable&Wireless and France Telecom;
- **Giovanni Gorno Tempini:** Chairman of the Board of Directors of Cassa Depositi e Prestiti (CDP) since October 24, 2019, he leads the integration of environmental, social and governance (ESG) sustainability principles into the institution's strategic and operational choices to create long-term value for society and communities. CDP's commitment to sustainability is formalized in the 2025-2027 ESG Plan, with goals for a fair and competitive ecological transition and for Italy's sustainable development. He is also a member of various committees and boards, including the Scientific Committee of the Aristide Merloni Foundation, the Board of Assonime, the General Council of AIFI, and the Board of ISPI. He has held positions as chairman of the "Technical Commission for Finance" of ABI and director of Borsa Italiana S.p.A.
- **Domitilla Benigni:** She has been General Manager since 2010, CEO since 2020 and shareholder of the company Elettronica S.p.A. Since June 2022 she has been a member of the Technical Scientific Committee of the National Cybersecurity Agency and since November of the same year she has been a member of the Technical Scientific Committee of the Center for Aeronautical Military Studies (CESMA). Her cybersecurity expertise supports the management of technology risks, including those related to data security and critical infrastructure;
- **Stefano Siragusa:** has held and holds positions of Director and President of listed and unlisted companies in the infrastructure, telecommunications and transport sectors including Sparkle, Inwit, Persidera, ENAV, Noovle, Saipem, Mermec, Marangoni, Metro 5 Milan. His experience in large infrastructure works and management of complex projects is essential for assessing the Group's environmental impacts and footprint reduction strategies.

To emphasize the Company's commitment to ESG issues, the Board of Directors of May 29, 2024 amended TIM's Principles of Self-Governance with respect to the composition of the Sustainability Committee, including the CEO among its members. The Corporate Communication & Sustainability Department is also expected to attend all Committee meetings.

## Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the company's administrative, management and supervisory bodies

**[26 a]:** The Board of Directors is periodically informed about the impacts, risks and opportunities relevant to the Company, as well as the actions and policies adopted to address them, including through endoconsiliar committees such as the Audit and Risk Committee and the Sustainability Committee, which meet according to an annually established agenda.

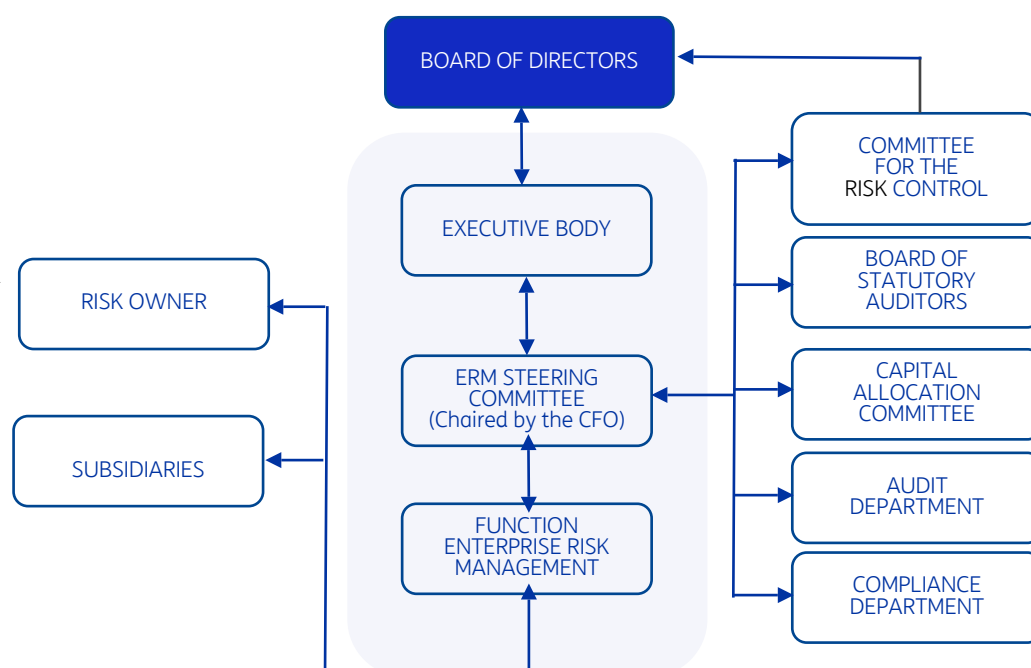
The Board of Statutory Auditors is also informed about these aspects, having access to all the documents and information necessary to carry out its supervisory work and participating in the work of the Board Committees.

With regard to sustainability issues, the outcome of the double-materiality analysis process, which identifies the impacts, risks and opportunities material to the Company, at the base of the construction of the Sustainability Reporting, is presented by the Corporate Communication & Sustainability function in a joint annual session with the Control and Risks Committee, the Sustainability Committee and the Board of Statutory Auditors. In 2024, the session took place on October 11. The outcome of the double materiality analysis was then presented to the Board of Directors on December 11, 2024.

[26 b, c]: The TIM Group's administrative, management and control bodies use the Enterprise Risk Management (ERM) process to quantify significant risks for the Company. This process supports management in identifying the strategies to be adopted, providing a picture of possible risk or opportunity scenarios.

The ERM process is continuous and involves all business functions (Risk Owners) participating in periodic Risk Assessments to update possible risk scenarios, including emerging ones. This approach allows maintaining proactive and up-to-date risk management, ensuring that the company is prepared to face any future challenges.

**[26 b,c]: Main stakeholders involved in the ERM process**



The ERM process is a fundamental strategic tool for risk management and for creating value for the Company. The model is aligned with international regulations and standards and makes it possible to identify, evaluate and manage risks in a homogeneous way within the Group, highlighting potential synergies between the actors involved in the evaluation of the Internal Control and Risk Management System (ICRMS).

The ERM process is integrated with strategic and operational planning processes and is designed to identify potential events that may affect business activity. The objective is to manage risk within acceptable limits without compromising the financial, operational and reputational stability of the company, ensuring the achievement of business objectives.

The **ERM process** involves several key activities:

- **identification and updating of the overall risk portfolio** in collaboration with the Risk Owners through analysis of the Business Plan and investment projects, monitoring of the macroeconomic and regulatory environment, and analysis of the risks to which company assets may be exposed;
- **quantitative assessment of risks**, both individually and from a portfolio perspective, taking into account possible correlations;
- supports management in **defining risk appetite and related tolerances** that are preliminarily validated by the Control and Risk Committee and subsequently approved by the Board of Directors;
- **definition and monitoring of risk mitigation plans**, with periodic updates to the Control and Risk Committee on the level of risk detected with respect to the approved Tolerances. This documentation is then submitted for final approval to the Board of Directors;
- **management of the flow of information to top management** and the bodies responsible for evaluating the ICRMS, producing the related supporting reports on a regular basis or at the request of the Supervisory Bodies;
- **periodic management of the ERM Steering Committee** to document and communicate to the respective Risk Owners the state of the Tolerances, in order to act promptly with appropriate remedial actions if necessary.

The risk management model takes an integrated and thoughtful approach to sustainability issues, considering economic, environmental, social, and governance (ESG) risks relevant to stakeholders according to the double materiality analysis.

Impacts identified through double materiality analysis are also integrated into business strategies, decision-making processes, and Enterprise Risk Management (ERM), ensuring that strategic decisions are informed by a comprehensive understanding of potential risks for responsible and sustainable governance.

For detailed evidence of ESG-relevant risks and opportunities see disclosure requirements IRO-1 “Description of processes to identify and assess relevant impacts, risks and opportunities”, E1-IRO 1 “Description of processes to identify and assess material climate-related impacts, risks and opportunities”, and E5 IRO-1 “Description of processes to identify and assess material impacts, risks and opportunities related to resource use and the circular economy”.

For the list of impacts of the relevant risks and opportunities faced by the administration, management and control bodies or their related committees during the reference period, please refer to disclosure requirement SBM-3 “Significant impacts, risks and opportunities and their interaction with the strategy and the business model” in this section.

### Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes

[29 a,b,c,d, e]: The **TIM Group's Report on the remuneration policy and compensation paid** is designed to support the achievement of the Company's strategic objectives and to focus on different business segments. This policy guarantees the necessary levels of competitiveness in the labor market and promotes the alignment of management interests with the goal of creating value for the company in the short and long term.

The Report on the remuneration policy and compensation paid adopts an appropriate balance of performance parameters of short-term and long-term incentive systems to achieve strategic objectives. The incentive systems include targets linked to financial performance and ESG (Environmental, Social, and Governance) goals derived from the three-year Business Plan.

ESG goals are part of the short-term and long-term variable compensation policy, demonstrating the Group's commitment to sustainability.

Since the Reports on Remuneration Policy and Compensation Paid for 2023 and 2024 were not approved by the respective Shareholders' Meetings of April 20, 2023 and April 23, 2024, the Report approved by the Shareholders' Meeting of March 2, 2022 was applied in 2024.

**Short-term variable compensation** in 2024 includes:

- a **gate objective of an economic and financial nature** consisting of the corporate indicator “TIM Group EBITDA”. Achieving the minimum level of this indicator is a necessary condition for access to the prize. The weight and minimum level of the objective are differentiated by population cluster, with a gate percentage of 95% for the Chief Executive Officer and the Front Line and 90% for the Other Management;
- a **pay-out scale** used to determine the accrual of the target-related bonus, which is uniform for all recipients. Each objective is measured individually, allowing different combinations of levels of achievement of the objectives. The linear interpolation mechanism is used between the minimum (equal to 50%), target (equal to 100%) and maximum (equal to 150%) objective levels.
- **Function objectives** for a weight that varies depending on the different pools of the recipients;
- **ESG objectives** with a total weight of 22% divided into the following sub-objectives:
  - Customer Satisfaction Index with a 10% weighting
  - Employee Engagement, in the young employee segment with a 6% weighting
  - Gender Pay Gap, in the Middle Managers segment with a 6% weighting

The **Long-term variable compensation** includes a 2022-2024 stock option plan for the CEO, Top Management and a select number of managers with key roles. The approximately 140 target managers are distributed over three pay opportunity bands in relation to the contribution made to the company's strategic objectives; for each band, the number of option rights assigned to target is determined.

The Plan includes two indicators:

- **Economic-financial indicator**, with a weight of 70%, consisting of EBITDA — CapEx accumulated over the three-year period (reported values);
- **ESG indicator**, with a weight of 30% divided into two sub-objectives:
  - % of the presence of women in positions of responsibility at the end of 2024, where positions of responsibility mean positions formalized in the business organization;
  - % renewable energy of the total energy consumed in 2024, defined as MWh from self-produced and purchased renewable sources divided by total MWh consumed.

The level of achievement of the indicators determines the accrual of option rights over an interval that ranges from -10% to +10% with respect to the target number allocated per bracket.

The Report on Remuneration Policy and Compensation Paid is approved by the Board of Directors, upon the recommendation of the Nomination and Remuneration Committee. For the ESG component, the Sustainability Committee is also involved.

In 2025, the BoD at its meeting on March 5, 2025 gave a favorable opinion for the **ESG component** of the short-term<sup>1</sup> variable compensation plan with a total weight of 22% as follows:

- Environment: number of data centers certified according to the European taxonomy (Italy);
- Social: women hired out of total hired (Group);
- Governance: % detractor at 4Q 2025.

**[E1 GOV-3, 13]:** Climatic aspects are taken into account in the compensation of the Chief Executive Officer and Executives with Strategic Responsibilities (DRS) through the "Stock Options" Long-Term Incentive Plan 2022-2024. The plan includes a target related to emission reduction and concerning the percentage increase in the use of renewable energy. The performance parameter is defined as the ratio between renewable electricity and the total electricity consumed in the 2024 financial year with a target value of 80%.

## Disclosure Requirement GOV-4 – Statement on due diligence

**[30], [32]:** The due diligence is an essential process that allows the TIM Group to evaluate and manage the risks and opportunities related to its business and its value chain, ensuring that the company operates in a responsible and sustainable manner, complying with international regulations and standards. The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights are the tools that outline the due diligence process and that form the basis of the Group's activities.

The table below provides a summary of the main aspects related to the due diligence referred to in the Sustainability Report.

### **[30], [32]: Statement on due diligence**

Main aspects of due diligence	Reference Paragraphs of the Sustainability Report
<b>Embedding of due diligence in governance, strategy, and the business model</b>	<ul style="list-style-type: none"> <li>• Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the company's administrative, management and supervisory bodies;</li> <li>• Disclosure Requirement GOV-3 – Integration of sustainability-related performance in incentive schemes;</li> <li>• Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with the business strategy and model (including application requirements related to specific sustainability issues in the relevant ESRs E1-S1-S2-S3-S4)</li> </ul>
<b>Engagement of stakeholders in due diligence</b>	<ul style="list-style-type: none"> <li>• ESRs 2 MDR-P – Policies adopted to manage relevant sustainability issues</li> <li>• Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the company's administrative, management and supervisory bodies</li> <li>• Disclosure Requirement SBM-2 – Interests and views of stakeholders</li> <li>• Disclosure Requirement IRO-1 – Description of the process for identifying and evaluating material impacts, risks and opportunities (including application requirements related to specific sustainability issues in the relevant ESRs E1-E5)</li> </ul>
<b>Identification and assessment of impacts and risks</b>	<ul style="list-style-type: none"> <li>• Disclosure Requirement IRO-1 – Description of the process for identifying and evaluating material impacts, risks and opportunities (including application requirements related to specific sustainability issues in the relevant ESRs E1-E5);</li> <li>• Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with the business strategy and model (including application requirements related to specific sustainability issues in the relevant ESRs E1-S1-S2-S3-S4)</li> </ul>
<b>Actions to address negative impacts and risks</b>	<ul style="list-style-type: none"> <li>• ESRs 2 MDR-A – Actions and resources related to material sustainability issues;</li> <li>• Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies;</li> <li>• Disclosure Requirement E5-2 – Actions and resources in relation to resource use and circular economy;</li> <li>• 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;</li> <li>• 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;</li> <li>• Disclosure Requirement S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions;</li> <li>• Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions</li> </ul>
<b>Monitoring and reporting of actions to address negative impacts and risks</b>	<ul style="list-style-type: none"> <li>• Disclosure requirement MDR-T – Monitoring the effectiveness of policies and actions through targets;</li> <li>• Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation;</li> <li>• Disclosure requirement S1-5 – Targets related to managing significant impacts, enhancing positive impacts as well as risks and opportunities</li> </ul>

<sup>1</sup> The 2025 remuneration policy is to be approved by the next Shareholders' Meeting and will also include ESG goals in the long-term plan. If not approved, the targets approved with the report of 2022 will apply.

## Disclosure Requirement GOV-5 – Risk management and internal controls over sustainability reporting

[36 a, b]: The Corporate Sustainability Reporting Directive introduces the position of the Sustainability Reporting Manager as the person responsible for the accuracy, reliability and compliance with standards of the information contained in the Sustainability Report.

On December 11, 2024, the Board of Directors appointed **the Head of the Corporate Communication & Sustainability Department** Maria Enrica Danese as the **Sustainability Reporting Manager**, with the task of certifying, together with the Managing Director, that the reporting is prepared in accordance with the reporting standards under the Law.

In 2024 TIM also adjusted its internal control process by implementing an “**Internal Control System on Sustainability Reporting**” (“**SCIRS**”) to support the certification by the Sustainability Reporting Officer.

The SCIRS Model helps to ensure the reliability and credibility of the Sustainability Reporting, based on the correct application of the Principles of relevance, comparability, verifiability, adaptability and faithful representation of information. TIM has prepared guidelines with the methodological references and responsibilities of the SCIRS and has defined a first set of controls associated with risks on sustainability disclosures.

To assess and prioritize risks in Sustainability Reporting, the SCIRS draws inspiration from the Committee of Sponsoring Organizations of the Treadway Commission (CoSO Report) framework and the March 2023 guidance “Achieving Effective Internal Control of Sustainability Reporting (ICSR)”.

The **SCIRS Model** is divided into the following phases:

- **definition of the scope of analysis** based on the risk/materiality analysis;
- **carrying out Entity Level Controls** (ELC) across the entire organization or on a single company in the group to ensure effective oversight of business risks and promote compliance with policies, procedures and regulations;
- **carrying out general controls on information systems** (Information Technology General Controls - ITGC) to ensure the reliability, security and integrity of the IT systems that support business processes and information reporting;
- **performing Process Level Controls** (PLCs) to ensure the relevance, faithful representation, comparability, verifiability, and understandability of information and operations performed within business processes;
- **execution of tests** and issuance of certificates;
- **independent audits**;
- **assessment and management** of control deficiencies **and remediation plan**;
- **Final Certificate** and Disclosure to the Administrative and Supervisory Bodies

The risk/materiality analysis for the SCIRS model combined external and internal factors for a balanced assessment between external assurance expectations and internal business process characteristics. This analysis covered all datapoints and companies in the consolidation scope of TIM's Sustainability Report.

The drivers considered for prioritizing the datapoints to be controlled include:

- the complexity of the database and/or calculation methodology;
- the potential reputational and/or material impact resulting from misstatement;
- the centrality of the datapoint with respect to TIM's sustainability policies;
- the materiality of the data point with respect to the ratings from the rating agencies.

[36c]: As part of the SCIRS, TIM has implemented Entity Level Controls, i.e., internal controls at the Group, Company, or Function level to oversee key business risks, which are also used in the Financial Disclosure Control Model and reflect the organization's focus on issues such as corporate governance, risk management, internal control system responsibilities, and the assignment of powers and responsibilities

The survey of Entity Level Controls is based on the CoSO Report, which provides 17 core principles associated with five typical components of a control system: Business Control Environment, Risk Management Process, Control Structure, Information System and Monitoring Activities. These components are interconnected and integrated with management processes.

The 17 control principles are divided into entity-specific control points, allowing for the identification of organizational and regulatory tools that meet them, taking into account synergies with the system of internal control over financial reporting.

For datapoints having the highest risk/relevance and for the most significant companies, TIM takes an approach that evaluates the design of controls from the business processes from which the datapoint originates. The analysis is carried out through the following operational steps:

- identification of control responsibilities;
- analysis of the risks of non-compliance of the datapoint with the qualitative characteristics provided for by the European Sustainability Reporting Standards (relevance, faithful representation, comparability, verifiability, comprehensibility);

- verifies that the control objectives are fully covered and mitigated by the underlying controls through the execution of the tests;
- identification of any areas for improvement.

Since a first implementation of the SCIRS Model on Sustainability Reporting and on training processes on priority datapoints, the main risks have concerned:

- the collection of the incomplete / inaccurate / inconsistent database;
- the incorrect calculation of the data, where the same requires processing and/or estimates and/or the use of calculation formulas;
- the incorrect aggregation / consolidation of data;
- the erroneous attribution of the data in the platform that collects the ESG data (ESG platform);
- the inaccurate / incomplete / inconsistent preparation of the Sustainability Report document.

In the face of these risks, the following main types of controls are envisaged:

- correct collection of the database through consistency and completeness checks;
- correct application of the calculation formulas, as well as the related processes and/or estimates;
- accurate and complete aggregation of data;
- correct attribution and approval of the data on the ESG platform;
- the inaccurate / incomplete / inconsistent preparation of the Sustainability Report document.

[36 d,e ]: The SCIRS Model provides for periodic monitoring of the adequacy and operation of controls through a combination of self-assessment by responsible corporate functions and independent audits. If the control is ineffective, the risk of error is assessed in terms of probability and impact, and then managed by opening a control gap and establishing a remedial plan.

The findings of risk assessment activities and internal controls are reported to the Administrative and Control Bodies. The Sustainability Reporting Officer, together with the Compliance Department, informs the Board of Statutory Auditors, the Audit and Risk Committee, and the Sustainability Committee on the status of controls and related testing; on the identified deficiencies assessed as significant in terms of their potential impact on Sustainability Reporting; on the relevant remedial plans, coordinating with the Financial Reporting Officer.

In view of the nature of parent company and the consequent need to proceed, in accordance with applicable legislation, with the preparation of the Consolidated Sustainability Report and the issuance of the related certificates referred to in Article 154-bis of the TUF, a process has been defined to ensure the coordination of information flows to the parent company TIM. This coordination is based on internal certificates issued by the parties involved in different ways in business processes.

## Strategy

### Disclosure Requirement SBM-1 Strategy, business model and value chain

[40 a i, ii]: **TIM is a leader in the development of communication infrastructures**, such as mobile and fixed networks, data centers and international connections, through Sparkle, as well as in offering communication services for the retail market and in integrated and customized solutions for the large companies and public administrations market. **TIM S.A.** stands out as **one of the main players in the South American telecommunications market** and as a leader in 4G and 5G coverage.

TIM's portfolio of solutions and services combines digital innovation with sustainability, creating synergies that promote technological development and contain an environmental impact.

For the **Consumer segment**, TIM offers individuals and families a wide range of fixed and mobile telephone products and services for communication and entertainment. At the same time, TIM supports small and medium-sized companies in their digitalization process, offering tailor-made solutions to meet their specific needs.

In the **Business segment**, TIM Enterprise acts as a strategic partner for companies and Public Administration, offering End-to-End solutions in the Cloud, Internet of Things (IoT) and Cybersecurity sectors. These initiatives, carried out thanks to the largest network of data centers in Italy, enhance the skills of the Group's companies, such as Noovle, Olivetti and Telsy, Trust Technology and make use of collaborations with internationally renowned partners.

In the TIM Group, some companies also have adopted the status of **Benefit Corporations**, integrating common benefit objectives in addition to profit into their corporate purpose. In particular:

- **Noovle**, which specializes in Cloud and Edge computing solutions and was the first company in the Group to become a Benefit Corporation in July 2021, with data centers certified to international standards and built according to the best security and energy efficiency criteria;



- **Olivetti**, focused on IoT and Big Data solutions, which expanded its corporate purpose to become a Benefit Corporation in January 2023, promoting sustainable Italian digitalization in line with the company's historical values;
- **Mindicity**, initially part of the fabbricadigitale group, acquired by Olivetti in May 2022, which enabled TIM to strengthen its portfolio of solutions to support local governments on smart city issues.

TIM is therefore the protagonist in Italy and Brazil of technological innovation that it integrates into its digital solutions and services to effectively promote the sustainable growth of the economy and society.

The Group also promotes initiatives of great social importance through the **TIM Foundation** in Italy and **Instituto TIM** in Brazil.

The delayering plan completed last July 1 and aimed at moving beyond the vertically integrated operator model through the sale of fixed network infrastructure assets to Kohlberg Kravis Roberts & Co. L.P. ("KKR") included the sale of the Wholesale Office, fixed-line access infrastructure assets, and Wholesale business. The transaction has allowed a greater focus on offering services in the consumer, business and Brazilian market segments.

**[40 a iii]:** At year-end 2024, the Group had 26,824 employees, mainly located in Italy (17,458) and Brazil (9,123)<sup>2</sup>.

**[40 a iv]:** The TIM Group does not offer prohibited products and services in the markets in which it operates, in accordance with applicable regulations.

**[40 e,g]:** The **2025-2027 Plan**, approved by the Board of Directors of the Group outlines an industrial strategy characterized by a pragmatic approach, **aimed at reducing debt, improving profitability and cash flows**. At the same time, the Plan is driven by the desire to implement an important transformation of operating models, processes and the ecosystem of rules to provide the company with a stronger operational and financial structure and make it more resilient in the current market consolidation phase.

This context includes the Group's ESG vision, perfectly integrated into the Plan, aimed at ensuring that the transformation simultaneously generates a significant, tangible and measurable environmental and social impact.

The environmental impact represents an opportunity to improve the company's operational efficiency and to adopt advanced processes and technologies. This means optimizing energy and resource consumption, reducing operating costs, meeting increasingly strict regulations and minimizing risks associated with possible sanctions. In this context, technological innovation not only strengthens the Group's position on the market, but also promotes greater resilience and adaptability.

The social impact, in the same way, involves for TIM the obligation to make organizational adjustments that respond to the main social trends, such as the evolution of working models, attention to internal organization with a view to overcoming the gender gap and the new needs of consumers. These adjustments make it possible to strengthen TIM's competitiveness, attract and retain the best talent and respond proactively to structural changes in the company.

This approach therefore represents a distinctive and strategic element, capable of promoting operational efficiency, stimulating innovation and ensuring effective risk management and control. At the same time, it makes it possible to exploit the opportunities deriving from the adoption of new technologies, the development of advanced operating models and the response to constantly evolving needs.

The Group's **sustainability strategy** outlined in the Plan aims to:

- **develop efficient and sustainable infrastructure** (5G, fiber, data centers) by obtaining environmental certifications, strengthening the use of renewable energy, including through self-generating solar energy plants for data center and network infrastructure elements, the reduction of emissions and resources through a long-term transition plan that also involves the production chain;
- **ensure cybersecurity and prevent attacks on infrastructure and customer data** by increasing the robustness and quality of control codes for IT solutions, automating test planning activities and detecting anomalies at the entry points of business systems;
- **addressing the challenges and opportunities related to technological transformation** by increasing investments in ICT, accelerating the adoption of artificial intelligence through the liberalization of licenses and the customization of solutions for complex processes, and by retraining and hiring talent;
- **create a work environment that values skills and merit**, ensuring equity and integrity as key principles for growth by introducing career development paths, increasing the presence of women and people of color (in Brazil) in leadership positions, strengthening female recruitment, implementing an equal pay monitoring system for all new hires starting in 2024.

The **circular economy model** (reuse/regeneration) permeates across the Group's operational processes to reduce the Company's environmental impact.

**Nine targets** were identified in the 25-27 Plan, including **six Group targets, two Domestic targets and one specific target for TIM S.A.** These targets are in line with the new industrial set-up and aim for concreteness, focusing on what has a significant impact for the Group and is actually achievable.

<sup>2</sup> "Italy" includes: TIM S.p.A., TIM Sparkle Italia, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies, TS Way, QTI S.r.l., Mindicity. TIM S.A. is the only company considered in "Brasil".



## Plan 25-27: ESG targets

GROUPS				Targets
Emissions Scope 1 + 2 + 3	100% green Energy Scope 2 2025	Carbon neutral Scope 1+2 2030	New transition plan <sup>1</sup> Scope 3 2030	Net Zero 2040
Gender equality	Leadership position (%women) <sup>2</sup>			35.5%
	Hiring (% women) <sup>3</sup>			50% 2027
ITALY				
Advanced digital solutions <sup>4</sup>				+ 17%YoY 2027
Digital Identity services <sup>5</sup>				+30% CAGR23-25 2025
BRAZIL				
Workforce upskill in digital capabilities	AI Academy, Agile Academy			≥90% 2027

<sup>1</sup> Transition plan includes TIM Brand products with carbon footprint

<sup>2</sup> By 2025 3.5%; by 2026 35%: the target refers to Italian and Brazilian women managers and directors

<sup>3</sup> By 2025 49%; by 2026 49.5%

<sup>4</sup> IoT, Cloud & Security service revenues

<sup>5</sup> PEC, SPID, Digital Signature - growth of active services, baseline 2022

[40 f]: In line with decarbonization strategy and Plan's environmental targets, TIM is increasingly attentive to offering **products and services that combine technology and environmental impact**, with the aim of directing customers towards conscious purchases. Here are some examples:

As far as products are concerned, in the Domestic area:

- a new "TIM HUB Pro" modem model has been introduced for which a carbon footprint is available. In 2024, 51,000 pieces were sold;
- SIM cards intended for TIM and KENA customers are made from 100% recycled plastic. Flyers made from FSC-certified paper and 100% recyclable plastic bags are also used;
- more than 800 reconditioned smartphones were sold;
- about 77,000 TIM Consumer mobile lines work with e-SIM, or with virtual SIMs that are an alternative to physical SIMs.

Regarding services, in the Domestic area, TIM:

- offers the "TIM Re-evaluates Smartphone" service aimed at Consumer customers that allows the return of the old smartphone receiving a discount on the purchase of a new device. The old device is either regenerated or disposed of sustainably. More than 5,500 smartphones were recovered in 2024, 80% of them reconditioned;<sup>3</sup>
- offers the "All Risk Assistance" service for Business customers, that provides for the replacement of the smartphone in the event of a failure or a refund in case of theft or loss. About 22,000 reconditioned smartphones were given as replacements in 2024, accounting for 77% of the total number of smartphones replaced;
- used reconditioned products for replacement activities. More than 33,000 reconditioned modems were used in 2024, accounting for 33% of the total number of replacements made.

In Brazil, TIM S.A.:

- offers the Smartphone and Smartwatch Trade-in Program service where customers can return their old devices and get a discount on the purchase of new models. In 2024, around 3,860 smartphones were collected, of which about 93% were reconditioned;
- gave over 163,000 reconditioned modems as replacements.

[42a]: In preparing disclosures relating to its **business model** and value chain, TIM considers:

- **core activities, resources, distribution channels, and customer segments:** key activities include the development and management of communication infrastructures. Resources include mobile and fixed networks, data centers and international connections. Distribution channels and customer segments include Consumer, Business, and International segment. For the **Consumer segment**, TIM offers individuals and families a wide range of fixed and mobile telephone products and services for communication and entertainment. In addition, it offers tailor-made solutions for small and medium-sized businesses, supporting them in their digitalization process. For the **Business segment**, through TIM Enterprise, the company offers End-to-End solutions in the Cloud, Internet of Things (IoT) and Cybersecurity sectors to companies and the Public Administration. These offers make use of the expertise of the Group's companies such as Noovle, Olivetti, Telsy, Trust Technology and collaborations with important international partners. For the **International segment**, Sparkle operates one of the world's most extensive fiber networks offering high-quality data, voice and video services. In Brazil, TIM S.A. represents one of the major players in the telecommunications market and a leader in 4G and 5G coverage.
- **the main business relationships** with customers and suppliers;
- **the cost structure and revenues** of the business sectors that comply with the disclosure requirements in the financial statements set out in IFRS 8, where applicable (refer to the "Financial and operating highlights of the business units of the TIM Group" in this Report on Operations);
- **the impacts, risks and potential opportunities** in the areas significant to the enterprise and the possible relationships with the business model or value chain (refer to table[48 ci,ii] "Material Impacts: scope of incidence and connection with strategy and business model").

TIM's business model pursues the creation of value by transforming inputs into results through a series of activities and projects. The inputs are represented by the following types of resources and key activities needed to create and distribute value. To create value and achieve business objectives, TIM makes use of various forms of capital:

- Share capital (owned);
- Financial capital;
- Physical-structural capital;
- Intellectual capital;
- Human capital;
- Social-relational capital.

Human capital, social-relational capital and intellectual capital are intangible resources essential for the value creation process.

<sup>3</sup> Numbers provided by Assurant, TimFin's partner in trading services

Human capital is a strategic element for TIM and is embodied in intangible resources such as talent, specialized, and managerial skills, as well as the health and safety protection of TIM employees (refer to the information in standard S1 “Own Workforce”).

Social-relational capital translates into dialogue with entities and institutions, labor relations, and stakeholder involvement that helps to strengthen corporate trust and reputation (see disclosure requirement SBM-2 “Interests and Opinions of Stakeholders”).

Intellectual capital includes intellectual property rights, such as patents and trademarks, as well as the technological know-how that allows the company to innovate and maintain a leadership position in the telecommunications sector. At the end of 2024, TIM has a portfolio that includes more than 2,350 patent applications and granted patents; the latter, granted by the European Patent Office and by the national patent offices of 14 countries, represent more than 90% of the total (refer to the “Innovation Research and Development” paragraph of the Report on Operations).

The knowledge and data necessary to make strategic and operational decisions are represented by:

- market data, such as analysis of demand, competition and industry trends;
- customer feedback such as requests, suggestions and opinions;
- legislative requirements and industry standards;
- internal reports on business performance/operational KPIs.

**[42 b]:** The products and results of the business model represent what the company markets (output) and the objectives achieved (outcomes). These reflect the value generated for customers, the company and all its stakeholders.

#### Benefits for TIM

- financial benefits: revenues, EBIT, cost reduction, process optimization;
- innovation: development of new business models;
- brand reputation.

#### Benefits for stakeholders

- customer satisfaction: customer experience, loyalty, response to needs;
- benefits in terms of social impact: improvement of quality of life, improvement of social inclusion and reduction of inequalities, development of talents and specialized skills, health and safety of workers;
- benefits in terms of environmental impact: reduction of emissions, use of renewable energy and promotion of circular economy models;
- relational benefits: development of partnerships and collaborations.

**[42 c]:** The TIM Group maintains important relationships with various suppliers of hardware, software and services which it uses for the operation of its network and systems and for customer assistance. In addition, it relies on suppliers for network equipment, mobile devices (smartphones, tablets, mobile phones) and fixed devices (modems, Set Top Boxes, FWA) intended for marketing on the Consumer and Business markets, as well as for software licenses and for the implementation of fixed and mobile telecommunications networks. In addition, TIM makes use in part of the networks of other operators and networks such as Fastweb, Open Fiber, A2A.

With the sale of NetCo, FiberCop has become the exclusive wholesale supplier of ADSL and FTTC connectivity, the leading provider of FTTH connectivity in Italy and the TIM Group’s largest supplier also for modem installation and maintenance services for its customers.

The TIM Group also hires a number of subcontractors for the maintenance of its network and the management of its call centers.

Finally, the TIM Group has signed multi-year contracts for hospitality and the management of its network equipment for the distribution of television content.

#### **[42 c]: TIM’s value chain, upstream and downstream**

Upstream value chain		Downstream value chain
Single provider of wholesale network services	TIM Group	Households, Small and medium-sized enterprises
Other operators and networks implemented by some local governments		Large Companies and Public Administration
Hardware Suppliers		Other fixed and mobile telecommunications operators
SW License Providers		Sales network (Dealers, stores,etc)
Specialist services in the field of software		Companies for the implementation of subscriber facilities
Integrated ICT solutions (HW and SW)		Companies for the implementation of subscriber facilities
Mobile terminal suppliers		Logistics companies for apparatus distribution
Subcontractors for network maintenance		Partnerships
Call center management subcontractors		
Subcontractors for installation and maintenance of terminals set up at customers' homes		
Logistics services		
Facility management services		

## Disclosure Requirement SBM-2 – Interests and views of stakeholders

**[45 a i, ii]:** In conducting its activities, the TIM Group takes into account the expectations and opinions of its stakeholders, in the belief that strong and satisfactory relationships are the only way to guarantee long-term value. Stakeholder engagement policies and strategies cover both direct activities and the value chain and are managed by the Corporate Communication & Sustainability Department, under the supervision of the Sustainability Committee of the Board of Directors.

The process of identifying stakeholders is based on the analysis of business processes, on the identification of all stakeholders, including vulnerable groups, on the grouping of stakeholders into homogeneous categories and on the identification of priority groups within each category.

The TIM Group's stakeholders are classified into eight categories: TIM people (includes trade unions); Customers; Suppliers; Business Community (includes peers, over the top, industry associations); Bodies and institutions (includes public administrations, national and international institutions); Financial community (includes shareholders and banks), Civil Society (includes consumer associations) and Media (includes opinion makers).

For each group of stakeholders, the most appropriate engagement tools are identified, which include one-to-one meetings, one-to-many meetings, information sessions, joint projects, surveys and focus groups.

### **[45 a ii, iv]: Main channels of engagement of the Group's stakeholders**

Stakeholders	Main Engagement Channels
<b>TIM people</b> (includes trade unions)	<ul style="list-style-type: none"> <li>• Approximately 11 million visits to the intranet platform in 2024</li> <li>• Approximately 25 million intranet page views in 2024</li> <li>• 870 thousand approx. news views on the intranet in 2024</li> <li>• 267 news stories made with 2,265 comments in 2024</li> </ul>
<b>Customers</b>	<ul style="list-style-type: none"> <li>• Listening plan with about 3.2 million interviews in Italy</li> <li>• Instant messaging conversations</li> <li>• Caring conversations on Facebook and Twitter</li> <li>• Reports in the MyTIM private area of theTIM.co.uk website</li> </ul>
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>• 217 qualified suppliers of which more than 18% were assessed on socio-environmental issues</li> <li>• 11 on-site audits done by TIM under JAC (Joint Alliance for Corporate Social Responsibility)</li> </ul>
<b>Business Community</b> (includes peers, over the top, industry associations)	<ul style="list-style-type: none"> <li>• Intraoperational working tables in trade associations (ASSTEL and Anitec-Assinform) and in the Confindustria Digitale Federation</li> <li>• Collaboration at Connect Europe (association of European telco operators) and Uni Europa ICT (association of the European ICT union)</li> <li>• Participation in conferences/events in Italy</li> <li>• Active member GSMA Foundation</li> </ul>
<b>Bodies and institutions</b> (includes public administrations, national and international institutions)	<ul style="list-style-type: none"> <li>• Participation in working tables on industrial policies, labor, and simplification with relevant ministries and government departments</li> <li>• Participation in Meetings/Working Groups of the European Commission</li> </ul>
<b>Financial community</b> (includes shareholders and banks)	<ul style="list-style-type: none"> <li>• Quarterly financial reports</li> <li>• Quarterly presentations/webinars</li> <li>• Participation in the compilation of questionnaires and surveys of major ESG rating agencies</li> <li>• Individual calls with leading industry analysts</li> </ul>
<b>Civil society</b> (includes consumer associations)	<ul style="list-style-type: none"> <li>• Active participation in the Consumers' Forum</li> <li>• Regular meetings with Consumer Associations participating in the Memorandum of Understanding</li> <li>• Collaboration with IDMO (Italian Digital Media Observatory), the European Union's Italian observatory for countering disinformation and disseminating best practices in the use of digital media</li> <li>• Collaborations with OPGE (Permanent Youth-Education Observatory) organization that invests in young people to foster training and education for citizenship, e.g., "Technology - Digital literacy" program</li> </ul>
<b>Media</b> (including opinion makers)	Approx. 240 Press releases in Italy and Brazil

[45 a iii, iv,v]: The **process of stakeholder engagement** in TIM<sup>4</sup> includes different phases and activities.

1. **Integration into Governance and Strategies:** stakeholder engagement is integrated into TIM's governance, strategies, and operations.
2. **Identification of Stakeholders:**
  - analysis of business processes;
  - identification of stakeholders for each process;
  - grouping of parts into homogeneous categories;
  - identification of priority groups within each category.
3. **Planning and Preparation:**
  - identification of the purpose, scope, ownership, mandate and stakeholders;
  - stakeholder profiling;
  - definition of levels and methods of engagement;
  - definition and communication of disclosure limits;
  - preparation of an engagement plan;
  - choice of indicators to measure engagement activities;
  - provision of adequate resources and capacity;
  - identifying and mitigating engagement risks.
4. **Engagement Tools:**
  - one-to-one and one-to-many meetings;
  - information sessions, joint projects, surveys, focus groups, etc.
5. **Implementation:**
  - invitations, information and briefings from stakeholders;
  - careful listening to stakeholders during engagement;
  - documentation of engagement;
  - development of action plans;
  - communication of engagement.
6. **Control and Evaluation:**
  - monitoring and assessment of the level of engagement;
  - commitment to improving engagement activities;
  - examination of the results of the engagement action plans;
  - drawing up of engagement reports;
7. **Feedback and Rating:**
  - collection of feedback from stakeholders;
  - assessment of risks and opportunities;
  - identifying gaps and the effort required to implement solutions.
8. **Reports and Impact Assessments:**
  - accounting for involvement activities in Sustainability Reporting;
  - feedback sessions with the stakeholders involved;
  - report to Top Management on selected topics.
9. **Communication and Complaints:**
  - providing clear communication channels for feedback and complaints;
  - complaint mechanisms available to communities.

TIM engages and listens to its stakeholders to improve operational efficiency, act ethically and sustainably, and to ensure that solutions and projects are aligned with their expectations and needs. The feedback received is used in a variety of ways.

As part of the double materiality analysis, for example, the stakeholders' expressed assessment of the impacts of TIM activities toward the environment and people was used to identify the Company's material IROs.

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<sup>4</sup> Stakeholder engagement in TIM is organized through a structured and systematic process that follows the guidelines of the AccountAbility 1000 standards (AA1000APS and AA1000SES)

The growing attention to issues such as environmental protection and gender equality has also stimulated TIM to strengthen the implementation of initiatives that lead in these directions. On the environmental side, for example, TIM has implemented initiatives that promote the regeneration and reuse of products and/or materials and is gradually introducing the carbon footprint of TIM brand products.

In the social sphere, sensitivity to the issue of gender equality and the active involvement of workers through surveys and interviews has led TIM to strengthen its commitment to diversity inclusion and empowerment. Among the various initiatives, TIM has signed the “Code of Self-Discipline for Responsible Companies in favor of Motherhood”, promoted by the Minister for Family, Birth and Equal Opportunities, and has doubled the mandatory paternity leave from 10 to 20 days to promote shared parenting. In addition, the Group shapes its relationships with its suppliers on the basis of respect for human rights and health and safety regulations and their involvement for sustainable development of their performance.

In the end, the feedback collected through the results of the “Customer Satisfaction Index” is used to monitor how customer satisfaction changes in response to the development of new offerings or projects and initiatives that have been started.

For detail with respect to the manner and process of engaging specific categories of stakeholders, please refer to the SBM-2 disclosure requirements “Interests and Views of Stakeholders” found in the topic chapters.

**[45 b],[45 c,i,ii,iii]:** The TIM Group's business model and strategy effectively takes into account the interests and opinions of relevant stakeholders, confirming the importance of ensuring a constant and structured dialogue capable of fostering a climate of cooperation and trust between the company and its stakeholders.

As part of the double materiality process TIM engaged stakeholders to assess the extent of potentially material impacts, risks and opportunities (IROs). External stakeholders' assessment of the impacts the company produces toward the environment and society was mediated with management's assessments to identify the list of material IROs for TIM.

The results that emerged from the double materiality analysis were used to direct corporate strategy, and in this sense, the evaluations expressed by stakeholders are in line with the action directions in the 2025-27 Plan.

In addition, concerns or specific needs of stakeholders are collected through institutional reporting channels. At present, there are no specific remedial measures in place or being planned.

**[45 d]:** The main activities and commitments of the TIM Group, including those involving stakeholders, are regularly presented to the Sustainability Committee, a direct expression of the Board of Directors.

With regard to sustainability issues, the outcome of the double materiality analysis process was presented at a joint session with the Control and Risk Committee, the Sustainability Committee and the Board of Statutory Auditors by the Corporate Communication & Sustainability function on October 11, 2024. The outcome was then presented to the Board of Directors on December 11, 2024.

## Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

**[48 a], [48 c iii,iv],[48h]:** The **double materiality analysis** conducted by the TIM Group in 2024 showed **46 material IROs** divided into: **13 negative impacts, 10 positive impacts, 15 risks and 8 opportunities**. In view of the coverage of the topics covered, the 46 IROs have been traced back to **7 ESRS topics**.

Below is the list of material impacts, risks, and opportunities (IROs), with the following details:

- order of materiality of IROs: inferred from the evaluations of internal and external stakeholders;
- description of the IRO;
- type of IRO: impact, risk, or opportunity;
- for impacts, it is indicated whether the effect that TIM has on the environment and on people, including human rights, is actual or potential;
- ESRS topic and sub-topic of reference to which the IRO is traced back for reporting purposes;
- scope of application: indicates the point in the value chain where the impact, risk, or opportunity falls. If the IRO is linked to the typical activities of TIM's business, we speak of “own activities”; if the IRO is linked to the supply chain, we speak of “upstream activity”; if the IRO is linked to customers, we speak of “downstream activity”;
- time horizon: refers to the time frame within which the effect of the IRO manifests itself. In line with what is defined by the Enterprise Risk Management function in the modelling of operational risks, we speak of the short term (within one year); medium-term (within three years, coinciding with the horizon of the business plan) and long-term (over three years).

[48 a], [48 c iii,iv]: List of material IROs

Ordine di rilevanza	Descrizione IRO	Tipologia IRO	Impatti effettivi/ potenziali	Tema ESRS	Sotto-tema ESRS	Perimetro di applicazione	Orizzonte temporale
1	Potential non-compliance with anti-bribery regulations in the conduct of business increases the likelihood of legal liability and financial sanctions, as well as reputational damage	Risk		ESRS G1 - Business conduct	G1 Active and passive corruption	Own activities	Short - Medium - Long
2	Strong ethical practices and transparent codes of conduct can improve brand reputation, attract ethical investors, and improve customer relationships	Opportunity		ESRS G1 - Business conduct	G1 Corporate culture, G1 Supplier relationship management, including payment practices	Own activities	Short - Medium - Long
3	The engagement of employees results in greater leadership capacity and professional development, improving job satisfaction	Positive impact	Actual	ESRS S1 - Own Workforce	S1 Equal treatment and opportunity for all	Own activities	Short - Medium - Long
4	Potential cybersecurity threats may involve the leak of sensitive customer and/or employee data	Negative impact	Actual	ESRS S1 - Own labor force, ESRS S4 - Consumers and end users	S1 Other work-related rights, S4 Information-related impacts for consumers and/or end-users	Own activities	Short
5	Cyber attacks and sabotage to physical infrastructure can cause an interruption in the operational continuity of services, causing a deterioration in economic and financial performance and reputational damage	Risk		ESRS S4 - Consumers and End Users	S4 Information-related impacts for consumers and/or end-users, S4 Social inclusion of consumers and/or end-users	Own activities	Short - Medium - Long
6	A flexible organizational environment that promotes the well-being of employees and their families can generate benefits in terms of work-life balance	Positive impact	Actual	ESRS S1 - Own Workforce	S1 Working conditions	Own activities	Short - Medium - Long
7	Insufficient safety measures, lack of training and inadequate protective equipment can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain	Negative impact	Actual	ESRS S1 - Own Workforce, ESRS S2 - Workers in the value chain	S1 Working conditions, S2 Working conditions	Own activities, upstream, downstream	Short - Medium - Long
8	Involving stakeholders in strategic initiatives helps create long-term value for customers and the supply chain	Positive impact	Actual	ESRS G1 - Business conduct	G1 Corporate culture	Own activities, upstream	Short - Medium - Long
9	Training and reskilling programs on the subject of digital transformation generate new skills to support the professionals of the future	Positive impact	Actual	ESRS S1 - Own Workforce	S1 Equal treatment and opportunity for all	Own activities	Short - Medium
10	Personalized and transparent offerings and seamless connectivity improve the customer experience, encouraging customer loyalty with consequences on the company's economic and financial flows	Opportunity		ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities, upstream, downstream	Short - Medium - Long



11	Human rights violations within the company and along the supply chain may result in legal liability and consequent reputational damage	Risk		ESRS S1 - Own Workforce, ESRS S2 - Workers in the value chain	S1 Other work-related rights, S1 Working conditions, S1 Equal treatment and opportunities for all, S2 Other work-related rights, S2 Working conditions	Own activities, upstream, downstream	Short - Medium - Long
12	Artificial intelligence and digital technologies allow better management of projects with a significant impact on the environment, such as the monitoring of environmental parameters (e.g. smart cities, smart agriculture) and the management of early warning systems	Positive impact	Actual	ESRS E1 - Climate Change	E1 Adaptation to climate change, E1 Climate Change Mitigation	Own activities, upstream	Short - Medium - Long
13	The construction and use of infrastructures (e.g. data centres) requires a high consumption of energy that can increase emissions with consequences on climate change	Negative impact	Actual	ESRS E1 - Climate Change	E1 Energy, E1 Climate Change Mitigation	Own activities, upstream	Short - Medium - Long
14	The adoption of digital technologies in business processes can improve the quality of service to customers and the ability to manage unexpected events that may interfere with the continuity of the service	Positive impact	Actual	ESRS S4 - Consumers and End Users	S4 Information-related impacts for consumers and/or end-users, S4 Social inclusion of consumers and/or end-users	Own activities	Short - Medium - Long
15	An inadequate incentive system can affect employee satisfaction	Negative impact	Actual	ESRS S1 - Own Workforce	S1 Working conditions	Own activities	Short - Medium
16	Inadequate development, inclusion, and work-life balance initiatives can affect employee satisfaction	Negative impact	Actual	ESRS S1 - Own Workforce	S1 Working conditions, S1 Equal treatment and opportunities for all	Own activities	Short - Medium
17	Unauthorized access to the personal data of customers or employees can result in legal liability, regulatory sanctions, economic and financial damage and reputational damage	Risk		ESRS S1 - Own labor force, ESRS S4 - Consumers and end users	S1 Other work-related rights, S4 Information-related impacts for consumers and/or end-users	Own activities	Short - Medium - Long
18	Incentive mechanisms that encourage employees to adopt sustainable practices promote a culture of responsibility towards environmental and social impact.	Positive impact	Actual	ESRS G1 - Conduct of enterprises, ESRS S1 - Own Workforce	G1 Corporate culture, S1 Working conditions	Own activities	Short - Medium - Long
19	Risks related to online security, such as cybercrime, cyberbullying and inappropriate content can result in legal liability, economic and financial losses and damage to reputation	Risk		ESRS S4 - Consumers and End Users	S4 Personal safety of consumers and/or end users	Own activities	Short - Medium - Long
20	The expansion in the offering of technologies and digital access (for example, PEC, digital signature, SPID) can lead to more inclusive connectivity for consumers	Positive impact	Actual	ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities, upstream, downstream	Short - Medium - Long

21	The use of fossil energy sources helps to increase emissions with consequences on climate change	Negative impact	Actual	ESRS E1 - Climate Change	E1 Energy	Own activities, upstream, downstream	Short - Medium - Long
22	A working environment that does not provide employees with the “right to disconnect” results in increased work stress and burnout, with consequences on employee well-being	Negative impact	Actual	ESRS S1 - Own Workforce	S1 Working conditions	Own activities	Short - Medium
23	Connectivity solutions that use digital technologies such as IoT, Big Data and AI ensure better data traffic planning for the benefit of customers	Positive impact	Actual	ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities, upstream	Short - Medium - Long
24	The absence of equal pay at executive, managerial and employee levels may require corrective action to encourage the attraction of talent	Negative impact	Actual	ESRS S1 - Own Workforce	S1 Equal treatment and opportunity for all	Own activities	Short - Medium - Long
25	The greater computing and data processing power required by the use of AI and digital technologies in business processes can increase energy consumption and the carbon footprint of the company or supply chain, affecting climate change	Negative impact	Actual	ESRS E1 - Climate Change	E1 Energy	Own activities, upstream	Medium - Long
26	Voluntary compliance with the Revenue Agency can bring benefits in terms of reputation and operational management	Opportunity		ESRS G1 - Business conduct	G1 Corporate culture	Own activities, upstream	Short - Medium - Long
27	The investments in infrastructure and the purchase of energy necessary for 5G, fibre optics and the cloud can affect climate change	Negative impact	Actual	ESRS E1 - Climate Change	E1 Energy, E1 Climate Change Mitigation	Own activities, upstream	Short - Medium - Long
28	Projects that promote social inclusion, including through cultural and artistic programs, can help spread awareness in the community and in the new generations	Positive impact	Actual	ESRS S3 - Communities Affected	S3 Economic, social and cultural rights of communities	Own activities	Short - Medium - Long
29	The acceleration of fiber roll-out and 5G can promote digital transformation and the enablement of new services and applications, contributing to greater customer satisfaction and the consolidation of market leadership	Opportunity		ESRS S4 - Consumers and End Users	S4 Information-related impacts for consumers and/or end-users, S4 Social inclusion of consumers and/or end-users	Own activities, downstream	Short - Medium - Long
30	The development of new business models that use advanced digital technologies (e.g. 5G, AI) can improve the company's operational efficiency, with consequences on economic-financial flows and benefits for consumers.	Opportunity		ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities	Short - Medium - Long
31	The inability to effectively involve suppliers in the reduction of emissions can cause the failure to achieve the climate objectives, with an impact on economic and financial results as well as reputational damage.	Risk		ESRS E1 - Climate Change, ESRS G1 - Business Conduct	E1 Climate change mitigation, G1 Supplier relationship management, including payment practices	Upstream, downstream activities	Long

32	Digital illiteracy widens socioeconomic gaps and does not allow full participation of customers in the economy	Negative impact	Actual	ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities	Short
33	Gender inequalities in terms of pay and positions of responsibility and non-transparent career paths can have consequences on the attraction and retention of talent	Risk		ESRS S1 - Own Workforce	S1 Equal treatment and opportunity for all	Own activities	Short - Medium - Long
34	The inability of the company or supply chain to conduct a responsible business, which responds to ethical social demands and transparent business practices, may limit competition and consumers' informed choices	Negative impact	Potential	ESRS G1 - Business Conduct, ESRS S4 - Consumers and End Users	G1 Corporate culture, S4 Social inclusion of consumers and/or end users	Own activities, upstream	Short - Medium - Long
35	Flexible and hybrid working models can improve employee productivity and well-being, while reducing operating costs	Opportunity		ESRS S1 - Own Workforce	S1 Working conditions	Own activities	Short - Medium - Long
36	The enhancement of employer branding, professional refresher programs and talent management strategies can help attract and maintain a highly qualified and diversified workforce	Opportunity		ESRS S1 - Own Workforce	S1 Equal treatment and opportunity for all	Own activities	Short - Medium - Long
37	The spread of pandemics or the occurrence of geopolitical conflicts can lead to potential shortages in the supply of goods and services and price increases, with consequences on the continuity of business activities and on the company's economic-financial flows	Risk		ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities, upstream	Medium - Long
38	The definition of attainable performance objectives for employees promotes company productivity	Opportunity		ESRS S1 - Own Workforce	S1 Working conditions	Own activities	Medium - Long
39	Extreme weather events due to climate change can create discontinuity in business activities, damage infrastructure and consequently affect the company's economic and financial flows	Risk		ESRS E1 - Climate Change	E1 Adaptation to climate change	Own activities, upstream, downstream	Medium - Long
40	The lack of technological transformation of legacy infrastructures and platforms can reduce the quality of service offered to customers and increase the vulnerability of systems, with consequences on business reputation	Risk		ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities	Short - Medium - Long
41	Failure to achieve coverage objectives may limit the offering of high-speed connectivity, with consequences on the customer experience and on economic-financial flows	Risk		ESRS S4 - Consumers and End Users	S4 Information-related impacts for consumers and/or end-users, S4 Social inclusion of consumers and/or end-users	Own activities, downstream	Short - Medium - Long

42	The incorrect management of waste by TIM (e.g. electronic waste) and its supply chain (e.g. network components) can contribute to environmental pollution and affect the transition to the circular economy	Negative impact	Potential	ESRS E5 - Resource use and circular economy	E5 Resource outflows related to products and services, E5 Waste	Own activities, upstream	Short - Medium - Long
43	Regulatory changes to energy and environmental policies may affect the profitability of energy efficiency actions and the use of renewable sources, with a possible increase in compliance costs	Risk		ESRS E1 - Climate Change	E1 Energy	Own activities	Short - Medium - Long
44	Failure to implement digital inclusion actions aimed at the accessibility and continuity of the services offered may result in customer dissatisfaction, potential sanctions and economic and financial losses	Risk		ESRS S4 - Consumers and End Users	S4 Information-related impacts for consumers and/or end-users, S4 Social inclusion of consumers and/or end-users	Own activities	Short - Medium - Long
45	Potential legal liabilities and financial sanctions deriving from antitrust investigations (e.g. incorrect business practices) can damage corporate reputation, with consequences on the company's economic and financial flows	Risk		ESRS S4 - Consumers and End Users	S4 Social inclusion of consumers and/or end users	Own activities	Short - Medium - Long
46	Failure to adapt to regulatory developments in the use of generative AI can cause reputational damage and sanctions and can harm the economic sustainability of the company	Risk		ESRS G1 - Business conduct	G1 Corporate culture	Own activities	Medium - Long

**[48 c i, ii]:** The following table shows the positive and negative, actual or potential impacts of TIM activities on people and the environment, which emerged as significant in the double materiality analysis. Specifically, it indicates the connection between each impact and the business strategy and business model is indicated to show how the company operates on a daily basis to achieve the designated goals.

**[48 c i,ii]: List of material impacts: scope of incidence and connection with strategy and business model**

Size	Description of Impact	Type of Impact	Actual/ Potential Impact	Scope of incident (Environment/People)	Linking impact to enterprise strategy or model
E	Artificial intelligence and digital technologies allow better management of projects with a significant impact on the environment, such as the monitoring of environmental parameters (e.g. smart cities, smart agriculture) and the management of early warning systems	Positive impact	Actual	Environment	Strategy/Business Model Technology Transformation
E	The construction and use of infrastructures (e.g. data centres) requires a high consumption of energy that can increase emissions with consequences on climate change	Negative impact	Actual	Environment	Strategy/Business Model Efficient and sustainable infrastructure
E	The use of fossil energy sources helps to increase emissions with consequences on climate change	Negative impact	Actual	Environment	Strategy/Business Model Efficient and sustainable infrastructure
E	The greater computing and data processing power required by the use of AI and digital technologies in business processes can increase energy consumption and the carbon footprint of the company or supply chain, affecting climate change	Negative impact	Actual	Environment	Strategy/Business Model technological transformation
E	The investments in infrastructure and the purchase of energy necessary for 5G, fibre optics and the cloud can affect climate change	Negative impact	Actual	Environment	Strategy/Business Model Efficient and sustainable infrastructure

E	The incorrect management of waste by TIM (e.g. electronic waste) and its supply chain (e.g. network components) can contribute to environmental pollution and affect the transition to the circular economy	Negative impact	Potential	Environment	Business Model Circular waste and resource management
S	The engagement of employees results in greater leadership capacity and professional development, improving job satisfaction	Positive impact	Actual	People	Strategy/Business Model Human capital development
S	Potential cybersecurity threats may involve the leak of sensitive customer and/or employee data	Negative impact	Actual	People	Strategy/Business Model Cybersecurity
S	A flexible organizational environment that promotes the well-being of employees and their families can generate benefits in terms of work-life balance	Positive impact	Actual	People	Strategy/Business Model Well-being in the workplace
S	Insufficient safety measures, lack of training and inadequate protective equipment can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain	Negative impact	Actual	People	Strategy/Business Model Well-being in the workplace
S	Training and reskilling programs on the subject of digital transformation generate new skills to support the professionals of the future	Positive impact	Actual	People	Strategy/Business Model Human capital development
S	The adoption of digital technologies in business processes can improve the quality of service to customers and the ability to manage unexpected events that may interfere with the continuity of the service	Positive impact	Actual	People	Strategy/Business Model Technological transformation
S	An inadequate incentive system can affect employee satisfaction	Negative impact	Actual	People	Strategy/Business Model Human capital development
S	Inadequate development, inclusion, and work-life balance initiatives can affect employee satisfaction	Negative impact	Actual	People	Strategy/Business Model Human capital development
S	Incentive mechanisms that encourage employees to adopt sustainable practices promote a culture of responsibility towards environmental and social impact.	Positive impact	Actual	People	Strategy/Business Model Human capital development
S	The expansion in the offering of technologies and digital access (for example, PEC, digital signature, SPID) can lead to more inclusive connectivity for consumers	Positive impact	Actual	People	Strategy/Business Model Technological transformation
S	A working environment that does not provide employees with the “right to disconnect” results in increased work stress and burnout, with consequences on employee well-being	Negative impact	Actual	People	Strategy/Business Model Well-being in the workplace
S	Connectivity solutions that use digital technologies such as IoT, Big Data and AI ensure better data traffic planning for the benefit of customers	Positive impact	Actual	People	Strategy/Business Model Technological transformation
S	The absence of equal pay at executive, managerial and employee levels may require corrective action to encourage the attraction of talent	Negative impact	Actual	People	Strategy/Business Model Human capital development
S	Projects that promote social inclusion, including through cultural and artistic programs, can help spread awareness in the community and in the new generations	Positive impact	Actual	People	Strategy/Business Model Technological Transformation
S	Digital illiteracy widens socio-economic gaps and does not allow full customer participation in the economy	Negative impact	Actual	People	Strategy/Business Model Technological Transformation
G	Involving stakeholders in strategic initiatives helps create long-term value for customers and the supply chain	Positive impact	Actual	People	Strategy/Business Model Business Conduct
G	The inability of the company or supply chain to conduct a responsible business, which responds to ethical social demands and transparent business practices, may limit competition and consumers' informed choices	Negative impact	Potential	People	Strategy/Business Model Business Conduct

[48 b], [48 d]: The double materiality analysis identified risks and opportunities that could affect the Group's economic and financial results and competitive position (financial materiality) and the Group's impacts on the environment, society and other stakeholders, regardless of financial implications (impact materiality).

The impacts, risks, and opportunities identified were the basis for identifying the material issues to be included in the 2024 Sustainability Report.

The assessment of ESG risks, impacts and opportunities has also helped to define the four pillars of the ESG strategy of the 2025-27 Plan:

- Develop efficient and sustainable infrastructure (5G, fiber, data center);
- Ensure cybersecurity and prevent attacks on customer infrastructure and data;

- Addressing the challenges and opportunities related to technological transformation;
- Create a work environment that values skills and merit, ensuring fairness and integrity.

With regard to the possible current financial effects of significant risks and opportunities, the following should be noted.

#### Environment

- Extreme weather events caused by climate change can interrupt business activities and damage infrastructure, affecting economic-financial flows. To mitigate possible risks from these extreme events:
  - In Italy, the Group took out an All Property policy for 6.2 million euros. In 2024, there were no extreme weather events that resulted in significant economic losses beyond the deductible threshold under the insurance coverage;
  - In Brazil, TIM S.A. has insurance contracts that cover operational risks, civil liability and IT risks. The policies cover damage to infrastructure resulting from extreme weather events such as earthquakes, tsunamis, floods, storms, hurricanes, cyclones, tornadoes, hail, smoke, and landslides and provide compensation limits for a total of R\$800 million (800 million reais). In 2024, a catastrophic climate event hit Rio Grande do Sul. TIM S.A. responded on four fronts: re-establishing network connections, supporting customers with roaming and 10GB of bonus data, assisting employees in affected regions, and donating basic necessities to communities in cooperation with local institutions. The crisis affected hundreds of cities and millions of people, representing an unprecedented event in Brazil. Restoration activities, which include reconstruction of telecommunications networks and planning for future similar events, are being managed by a specially created task force of more than 180 professionals (employees and suppliers) that will continue to operate on a permanent basis throughout the reconstruction phase. The cost estimate for the company is not yet available.

#### Social

- In the **area of privacy**, unauthorized access to the personal data of customers or employees can result in legal liability, regulatory sanctions, economic and financial damage and reputational damage. During 2024, the Data Protection Authority (GDPR) did not carry out any inspection activities at TIM or its Italian Group Companies, nor did it take any prescriptive or sanctioning measures against them. The Privacy Protection Authority, on the other hand, initiated proceedings in November 2024, with the possible adoption of prescriptive measures or sanctions, with reference to inaccuracies in customer contact details. TIM has sent a defensive statement and is awaiting the Authority's determinations;
- In the area of **cybersecurity**, cyber attacks and sabotage of physical infrastructure can disrupt the business continuity of services, worsening economic and financial performance and damaging the reputation of the Company. No security incidents classified as "major" occurred in 2024. There was only one incident with a medium impact, caused by a DDOS attack (which targets websites and servers by interrupting network services) characterized by unusually aggressive methods. Specifically, the disruption was related to the partial inability to reach some business services, including [www.tim.it](http://www.tim.it) and [www.gruppotim.it](http://www.gruppotim.it). The attack was quickly mitigated with the implementation of appropriate countermeasures to avoid similar episodes in the future. The public network delivery services were not impacted, as were the internal services, and there were no data losses or compromise. Finally, there are two other incidents with a low impact, caused by process or system vulnerabilities; they too have not led to the compromise or loss of data or to economic impacts;
- In connection with **improper commercial practices** in 2024 in Italy, the AGCM (Competition and Market Authority) did not initiate any proceedings against TIM in this area that produced financial effects during the year.
- With regard to **consumer protection**, AGCOM (the Communications Authority) has not ordered any proceedings against TIM aimed at ascertaining the violation of sector regulations and which produced financial effects during the year. In Brazil regarding processes related to consumer rights, TIM S.A. reports 23 cases of non-compliance with significant laws and regulations with 7 non-monetary penalties and 16 fines, totaling R\$4.4 million, related to customer services and the blocking of telemarketing calls.

#### Governance

- On the subject of **business conduct**, in 2024, the Group in the Domestic area did not encounter any significant incidents of non-compliance with applicable laws and regulations. Consequently, there were no penalty consequences. In Brazil, TIM S.A. faced 87 administrative proceedings in environmental matters in 2024, most of which involve the applicability of state and/or municipal legislation, depending on the jurisdiction. Of the pending cases, 26 have no monetary penalties and 23 cases have no possible financial impacts of significant value (less than 500,000 reais). The remaining 38 administrative proceedings were completed in 2024. With regard to Anatel (the Brazilian Government Telecommunications Agency), there are two significant ongoing proceedings relating to non-compliance with certain obligations, such as the quality of the service and the rights and guarantees of users (Procedure for determining non-compliance with obligations - PADO - with Anatel and Procedure for determining a program item - PADIC). In 2024, fines of R\$1.5 million were paid, including one for the previous years and seven for the period under review.
- Regarding **tax matters**, during the reporting period, no significant tax penalties exceeding €100,000 were paid relating to the Domestic BU.

**[48 f]:** The TIM Group adopts a resilient strategy and business model, able to face impacts and risks and to seize opportunities. The assessment of business resilience is carried out already during the definition of the Strategic Plan, through scenario projections, strategic and competitive analyses, to define strategy and competitive positioning, identify consistent objectives and actions in the short and medium-long term, and verify their implementation through performance measurement.



In addition, the Enterprise Risk Management (ERM) function provides an overall view of the main business risks, including those related to sustainability issues, and of the evaluation of mitigation actions.

Specifically, with regard to the environmental dimension, ERM monitors and assesses environmental risks related to climate change, proposing mitigation actions to strengthen the resilience and efficiency of assets and continue the energy transition process (see disclosure requirement E1 IRO-1 “Description of processes to identify and assess material climate-related impacts, risks, and opportunities”).

In the social sphere, on the other hand, the Group implements processes in accordance with industry best practices, allowing the company to identify and manage potential negative impacts deriving from its operations, the value chain, the products or services offered and from business relationships.

Finally, from the point of view of governance, the Group constantly monitors regulations and its business conduct, identifying possible corrective actions to address risks and negative impacts generally attributable to issues related to compliance and business ethics.

**[48 g]:** In the previous financial year, TIM focused mainly on the effects of the company’s activities externally, that is, the positive and negative impacts. Compared with what was inferred from the 2024 double materiality analysis, no significant changes were identified. The risks and opportunities, resulting from the new approach that has integrated the perspective of financial materiality, are all attributable to issues mapped by business processes and/or governed by the Risk Management model.

## Impact, risk, and opportunity management

### Disclosure Requirement IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities

**[53 a]:** In line with the regulations of the Corporate Sustainability Reporting Directive (CSRD), the TIM Group conducted a double materiality analysis to identify material impacts (Impact Materiality) and material risks and opportunities (Financial Materiality), while also following the indications in Implementation Guidance 1 “Materiality Assessment” published by EFRAG. To identify the list of material IROs, TIM used a dynamic semantic engine that, based on information extracted from public documents such as regulations, financial, and sustainability reports, and online news from peers in the “Technology & Telecommunication” sector, generated an initial list of potentially material positive and negative impacts, risks, and opportunities (IROs). The list was then subjected to evaluation by internal and external stakeholders and finally to an analysis to define the significance threshold that led to the identification of material IROs.

The double materiality analysis together with the list of material impacts, risks and opportunities was presented to the Sustainability Committee and the Audit and Risk Committee on October 11, 2024, and subsequently, to the Board of Directors on December 11, 2024.

The **double materiality analysis activity was carried out involving the main companies in the Group’s perimeter, including TIM S.p.A, TIM S.A, Noovle, Olivetti and Sparkle.** TIM S.A. conducted its own double materiality analysis, the results of which showed no significant differences from the analysis conducted at the Group level. Although the degree of detail in the description of IROs varies, the aspects covered are broadly similar. The distinguishing features of TIM S.A.’s analysis involve the identification of a positive impact associated with ESRS Theme E4 “Biodiversity and Ecosystems” and a risk associated with ESRS Theme E3 “Water and Marine Resources”, both of which are considered to be non-material at the Group level.

**[53 b i, ii]:** Potentially material impacts were identified by considering the general and specific dynamics of the Technology & Telecommunication sector, whether generated directly by the TIM Group or indirectly through relationships with suppliers and customers. This assessment takes into account the peculiarities of the value chain in the Italian and Brazilian context and the impacts on people or the environment, both positive and negative, both current and future, in a short-, medium-, or long-term time horizon. The list of positive and/or negative impacts submitted for evaluation includes those in which the TIM Group is involved through its activities or business relationships.

**[53 b iii]: Impacts were assessed** by administering a survey to external stakeholders and board directors; while for **internal stakeholders**, such as C-level and key function/company managers, one-on-one interviews were held.

Regarding **external stakeholders**, a significant sample was selected for each of the categories surveyed covering: TIM’s people; Customers; Media; industry Business Community; Institutions and regulatory bodies; Suppliers; Civil Society; the Financial Community. Overall, **a sample of about 11,000 stakeholders was involved with a redemption of about 37%.**

**[53 b iv]:** Material impacts were identified by rating their importance on a scale of 1 to 5, considering factors such as severity (average of magnitude, extent and irretrievable nature) and likelihood (for potential impacts) for negative impacts. For positive impacts, the assessment was made on a scale of 1 to 5 for magnitude, extent, and likelihood. The total score for each impact can range from 1 to 25, based on the product of the factors mentioned. Impacts considered material exceeded the threshold of 12.

**[53 c i, ii]:** Like the impacts, risks and opportunities were also identified through the semantic platform’s extraction of data from documentary sources related to peers and actors in the TIM Group value chain, both upstream and downstream.

From this extraction, a **list of potentially material risks and opportunities** was then created and **shared with the ERM function**, which is responsible for risk management in the company. Next, the list was **evaluated by internal stakeholders**, who assigned a score from 1 to 5 to each risk and opportunity in terms of likelihood and impact. The materiality of each risk and opportunity was determined based on the product of these two drivers, selecting those with a score above 12. Finally, the assessment of risks and opportunities and the



related possible economic and financial impacts on Plan objectives was carried out by ERM according to the adopted risk management methodology.

**[53 c iii]:** The TIM Group attaches strategic priority to risks related to sustainability, integrating them into overall risk management processes. These risks are evaluated through the double materiality analysis process that takes into account the viewpoint of stakeholders and the actual or potential impact on business performance. In addition, TIM uses advanced quantitative and qualitative analysis tools, such as probabilistic models and scenario analysis, such as environmental risks, in line with best market practices and international standards (including TCFD). These tools make it possible to assess the urgency and impact of sustainability risks compared to other risk categories, ensuring integrated and proactive management. Based on the outcome of the assessment of the various risks, the company implements prioritized mitigation actions according to their riskiness.

**[53 d]:** The TIM Group's decision-making process is based on structured governance involving the Board of Directors, the appropriate committees (such as the Control and Risk Committee and the Sustainability Committee) and the company's operational functions.

With regard to the double materiality activity, in addition to the involvement of various stakeholders, the list of impacts, risks, and opportunities was presented to the Sustainability Committee, the Audit and Risk Committee, and then to the Board of Directors. In reference to internal control procedures, please refer to the section on GOV-5 disclosure requirement "Risk management and internal controls over sustainability reporting".

**[53 e]:** The process of identifying, assessing and managing sustainability-related risks is integrated into TIM's Enterprise Risk Management (ERM) framework, enabling a unified view of business risks. The information gathered is used to identify the company's risk profile, while also ensuring that the mitigation measures identified are consistent with the company's long-term strategies and with Business Plan objectives.

**[53 f]:** With regard to opportunities, the approach adopted by the TIM Group, integrated with the ERM process, aims to identify, evaluate and manage opportunities related to sustainability, including them in the overall decision-making process. The opportunities related to sustainability are then evaluated both from the point of view of their economic potential and for their contribution made to the objectives indicated in the Group's strategic plan. The process is supported by continuous monitoring through specific KPIs, which make it possible to measure the effectiveness of the actions taken and to realign strategic priorities based on the results achieved.

**[53 g], [53 h]:** The double materiality analysis conducted with reference to the current Sustainability Report made use of a dynamic semantic engine, benchmarking analysis and integrated with inputs from ERM analysis.

Through extrapolation of data from peers and best practices obtained by drawing on a variety of documentary sources (such as significant mandatory and voluntary regulations, financial and sustainability reports, and online news), it was possible to identify the most stringent topics from which the TIM Group started to determine the list of potentially material IROs and then subsequently, the topics associated with them.

The process has undergone a change from the approach taken in previous years, which was limited to the impact materiality perspective only. The approach to the materiality analysis carried out in this Sustainability Report follows the dual perspective of Impact Materiality and Financial Materiality, evaluating and identifying material impacts, risks and opportunities according to the metrics suggested by the regulations.

**[E1 IRO-1, 20]:** To identify, evaluate and manage the risks and opportunities related to climate change in the short (0-3 years), medium (3-10 years) and long term (10-20 years), the TIM Group implements a climate risk management process on an interim basis (more than once a year) integrated into the wider business risk management process, providing full disclosure of the correlations between risks and opportunities related to climate change and to the entire the Group's value chain (own transactions, downstream and upstream), for a correct formulation of business strategies.

In particular, within the structure of the Chief Finance Office Department, the Enterprise Risk Management & Insurance (ERM) function collaborates and supports risk owners in identifying and evaluating risks, accordingly updating the risk register (the so-called Risk Universe), identifying risk mitigation plans and initiating constant monitoring of their implementation.

The ERM function conducts specific Risk Assessments on company management in order to evaluate and quantify risks or opportunities with respect to the Plan's objectives, providing a summary view to the Control and Risk Committee (CCR) according to the dimensions of economic impact and probability of occurrence, highlighting the detail by macro-category of risk with respect to the defined Tolerances. Possible reputational and criminal impacts are also considered. In addition, the Enterprise Risk Management function, in collaboration with the Sustainability function, has developed a methodology for the assessment and monitoring of ESG risks with an approach based on Key Risks.

**[E1 IRO-1, 20 a]:** The activities of telecommunications companies and their value chain can have a material impact on the global climate system due to the release of greenhouse gases or gases with high warming potential into the atmosphere. TIM in 2024 produced 2,427,883.42 tons of CO<sub>2</sub> equivalent (tCO<sub>2</sub>eq) of total Location-Based GHG emissions and 2,181,176.72 tCO<sub>2</sub>eq of total Market-Based GHG emissions (see "Environmental Information" section, disclosure requirement E1-6 "Gross Scope 1, 2 and 3 GHG emissions and total GHG emissions").

**[E1 IRO-1, 20 b], [E1 2 IRO-1, 21]:** In the Enterprise Risk Management process, **TIM has identified and evaluated in the short, medium and long term, physical risks related to rising temperatures**, which cause extreme weather events such as landslides, floods and overflows. These hydrogeological hazards can damage real estate and network assets, increase Assurance costs, and reduce production capacity due to thermal stress. TIM used qualitative and quantitative scenario analysis at the Group level to assess its climate strategy.

Specifically, among the scenarios proposed by NGFS (Network for Greening the Financial System), the scenario based on RCP 1.9 (1.5°C) (Representative Concentration Pathway - scenario with which an increase in emissions and consequent rise in temperature is associated) and RCP 4.5 (2.1°C-3°C) was considered.

The Group has chosen a scenario analysis for its climate strategy that assesses climate change risks as part of the Risk Management (ERM) framework. Risks to business assets, such as floods and inundations, and business continuity were considered. The analysis focused on hydrogeological risk and job performance.

With respect to hydrogeological risk (Net Zero Scenario by 2050), using Climada's hydrogeological risk maps, it was possible to correlate TIM assets with climate risk scenarios and quantify the impact based on reconstruction/rehabilitation costs. From the correlation between the value of exposure to risk and the vulnerability of the Assets, it was possible to quantify the increase in the risk value by 2030.

Regarding the risk of work performance disruption, the analysis shows that hot and humid weather conditions reduce overall work productivity by 9.84%. For TIM, the impact on job performance can translate into a reduction ranging from 0.8% (with a risk of 16 million euros) in the best case scenario of +1.4°C to a reduction of 2.4% (with a risk of 50 million euros) in the worst case scenario of +2°C.

TIM also assessed significant weather events in the ICT sector that may affect business operations and disrupt service business continuity, putting financial results at risk. It conducted a climate risk assessment to monitor potential damage to assets and the evolution of mitigation actions over time.

To ensure the continuity of Essential Communication Services during critical events or emergencies, TIM has carried out exercises to test and simulate, for example, the management of natural disasters, civil defense events, and computer failures. Vulnerability assessment tests are also conducted periodically for risks associated with IT systems, verifying the efficiency of implemented security countermeasures.

**[E1 IRO-1, 20 c i, ii], [E1 IRO-1 21]:** Transition risks from the introduction of a carbon tax on CO<sub>2</sub> emissions and increased spending on the purchase or production of renewable energy to curb emissions (Energy Overspending) were also considered in the Enterprise Risk Management process.

TIM has adopted Group-wide qualitative and quantitative scenario analyses to assess its climate strategy. In particular, the following scenario was considered among those proposed by NGFS (Network for Greening the Financial System) aligned with keeping the global temperature below 1.5°C: quantitative analysis with respect to the Net Zero target by 2040 focused on: a) potential regulatory obligations aimed at offsetting non-reducible CO<sub>2</sub> emissions, such as, for example, the introduction of the carbon tax; b) increased costs associated with the introduction of the carbon tax.

In the period up to 2040, a linear estimate of the gradual reduction of CO<sub>2</sub> emissions was made, with ten-year intervals. Possible failure to meet targets with hypothetical deviations of 10%, 20%, and 30%, and the associated economic impact were also estimated.

TIM also assessed significant weather events in the ICT sector that could affect business operations and disrupt service business continuity, putting financial results at risk.

Regarding the transition scenario and the introduction of a potential carbon tax in this decade, the impact on business strategy was immediate. An annual carbon tax was estimated based on the Group's total emissions, with a unit price of €83.50 per tCO<sub>2</sub> (average price 2024). To avoid this annual cost, TIM has brought forward the goal of using 100% renewable electricity for its Italian operations to 2025, while for Brazil the goal has already been met.

TIM has assessed transition risk, which could result in higher costs for business operations, particularly for initiatives to reduce emissions, as described in Disclosure Requirement E1-3 "Actions and Resources Related to Climate Change Policies".

The company conducted an in-depth analysis to identify assets and activities that may be incompatible with the transition to a zero-emission economy or require significant adjustment efforts. This assessment was conducted in accordance with Delegated Regulation (EU) 2021/2139 and the principles of the EU Taxonomy. Critical issues identified include data center and network infrastructure management, energy consumption, and dependence on fossil sources in the supply chain. To address these critical issues, TIM invests in data centers with environmentally-friendly cooling systems that use renewable energy. In addition, the company works with suppliers to reduce indirect emissions (Scope 3) by implementing more stringent ESG criteria in production processes.

**[E5 IRO-1, 11 a]:** The TIM Group has implemented a double materiality analysis process aimed at identifying the material impacts, risks, and opportunities associated with the use of resources and the circular economy, with particular reference to issues related to incoming resource flows, outgoing resource flows, and waste, carrying out an assessment that would take into account the effects produced by these IROs along the entire value chain, both upstream and downstream.

The analysis was conducted starting from the context in which the Group operates, its assets, its activities, and from an external analysis through the support of the Datamaran dynamic semantic engine, which, through the analysis of public documents, relevant regulations and sustainability reports of a representative sample of companies in the "Technology & Telecommunication" sector in Italy and Brazil, identified material issues related to the use of resources and the circular economy (ESRS E5). Following the materiality analysis, a single IRO associated with the ESRS E5 topic emerged as material, specifically a negative impact. This impact was attributable to the sub-topics "flows of outgoing resources" and "waste", thus making the sub-topic "flows of inbound resources" non-material.

**[E5 IRO-1, 11b]:** The materiality of the impacts, risks and opportunities associated with the use of resources and the circular economy was determined through one-to-one interviews with internal stakeholders and the administration of surveys to external stakeholders, including civil society in the latter category.

**[G1 IRO-1, 6]:** In considering the criteria used in the process to identify material IROs in relation to business conduct issues, the following were considered: the location of the Company, as TIM considers the geographic context of its operations, with a focus on areas where there are greater risks of negative impacts related to ethical issues, human rights, and regulatory compliance; its business, analyzing different business areas and operational activities, assessing exposure to risks of misconduct; the telecommunications sector in which it operates, as it is subject to stringent regulations as well as specific challenges in terms of privacy, data security and social responsibility; the structure of the operation, as the process considers corporate governance, how

subsidiaries and joint ventures are managed, and compliance and internal control policies designed to prevent unethical behavior.

## Index of ESRS contents and contents from other EU legislative acts

### Disclosure Requirement IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement

[56]: In line with regulatory requirements, the following is the list of disclosure requirements represented in the Sustainability Report 2024, based on the results of the double materiality analysis. For the purpose of selecting the reported disclosure requirements, the following were excluded:

- requests related to the topics "ESRS E2 - Pollution," "ESRS E3 - Water and Marine Resources," and "ESRS E4 - Biodiversity and Ecosystems," which emerged as not material;
- additional requests for details related to the issues that emerged as material but for which, after a subsequent evaluation considering the Group's operational context and actual applicability, were considered as not material.

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**Phase-in:** Disclosure requirements/paragraphs (datapoints) for which TIM does not provide disclosure as they are subject to the possibility of gradual introduction

Instead, the following table maps all the paragraphs (datapoints) with related disclosure requirements that, in addition to CSRD, respond to other EU regulations, such as the "Sustainable Finance Disclosure Regulation" (SFDR), the "Capital Requirements Regulation" (Pillar 3), the "Benchmark Indices Regulation," and the "European Climate Act." If the paragraph is reported by TIM as relevant, the reference page where to find the information is given. On the other hand, if the paragraph is not accounted for, the number is not specified.



Paragraph and corresponding Disclosure Requirement.	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page number
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Annex 1, Table 1, Indicator number 13		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II		129
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		130
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Annex 1, Table 3, Indicator number 10				135
ESRS 2 SBM-1 Engagement in activities related to fossil fuel activities, paragraph 40 (d) i	Annex 1, Table 1, Indicator number 4	Article 449-bis of Regulation (EU) no. 575/2013; implementing regulation (EU) 2022/2453 of the Commission (6), Table 1 - Qualitative information on environmental risk and Table 2 - Qualitative information on social risk	Commission Delegated Regulation (EU) 2020/1816, Annex II		-
ESRS 2 SBM-1 Engagement in activities related to chemical production paragraph 40 (d) ii	Annex 1, Table 2, Indicator number 9		Commission Delegated Regulation (EU) 2020/1816, Annex II		-
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Annex 1, Table 1, Indicator number 14		Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818 (7) and Annex II of Delegated Regulation (EU) 2020/1816		-
ESRS 2 SBM-1 Engagement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816		-
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Article 2(1) of Regulation (EU) 2021/1119	-
ESRS E1-1 Companies excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 1: Bank portfolio — Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and remaining duration	Article 12, paragraphs 1 d) to g), and paragraph 2, of Delegated Regulation (EU) 2020/1818		-
ESRS E1-4 GHG emission reduction targets, paragraph 34	Annex 1, Table 2, Indicator number 4	Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 3: Bank portfolio — Indicators of potential transition risk related to climate change: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		190

ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Annex 1, Table 1, Indicator number 5 and Annex 1, Table 2, Indicator number 5				192
ESRS E1-5 Energy consumption and mix, paragraph 37	Annex 1, Table 1, Indicator number 5				191
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Annex 1, Table 1, Indicator number 6				192, 193
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Annex 1, Table 1, Indicator numbers 1 and 2	Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 1: Bank portfolio — Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and remaining duration	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		193
ESRS E1-6 Intensity of gross GHG emissions, paragraphs 53 to 55	Annex 1, Table 1, Indicator number 3	Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, model 3: Bank portfolio — Indicators of potential transition risk related to climate change: alignment metrics	Article 8(1) of Delegated Regulation (EU) 2020/1818		197
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Article 2(1) of Regulation (EU) 2021/1119	197
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		phase-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		Article 449-bis of Regulation (EU) no. 575/2013; points 46 and 47 of the Commission's Implementing Regulation (EU) 2022/2453; Model 5: Bank portfolio — Indicators of potential transition risk related to climate change: exposures subject to physical risk			phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)		Article 449-bis of Regulation (EU) no. 575/2013; point 34 of the Commission's Implementing Regulation (EU) 2022/2453; Model 2: Bank portfolio — Indicators of potential transition risk related to climate change: loans secured by real estate — Energy efficiency of collateral			phase-in

ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Annex 1, Table 1, Indicator number 8; Annex 1, Table 2, Indicator number 2; Annex 1, Table 2, Indicator number 1; Annex 1, Table 2, Indicator number 3				-
ESRS E3-1 Water and marine resources, paragraph 9	Annex 1, Table 2, Indicator no. 7				-
ESRS E3-1 Dedicated policy, paragraph 13	Annex 1, Table 2, Indicator number 8				-
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Annex 1, Table 2, Indicator number 12				-
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Annex 1, Table 2, Indicator number 6.2				-
ESRS E3-4 Total water consumption in m3 compared to net revenue on own operations, paragraph 29	Annex 1, Table 2, Indicator no. 6.1				-
ESRS 2 IRO-1 - E4 paragraph 16 (a) i	Annex 1, Table 1, Indicator no. 7				-
ESRS 2 IRO-1 — E4 paragraph 16, letter b)	Annex 1, Table 2, Indicator no. 10				-
ESRS 2 IRO-1 — E4 paragraph 16, letter c)	Annex 1, Table 2, Indicator no. 14				-
ESRS E4-2 Sustainable land / agriculture practices or policies, paragraph 24 (b)	Annex 1, Table 2, Indicator no. 11				-
ESRS E4-2 Sustainable oceans / seas practices or policies, paragraph 24 (c)	Annex 1, Table 2, Indicator no. 12				-
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Annex 1, Table 2, Indicator no. 15				-
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Annex 1, Table 2, Indicator no. 13				204
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Annex 1, Table 1, Indicator no. 9				205
ESRS 2 – SBM3 – S1 Risk of incidents of forced labor, paragraph 14 f)	Annex 1, Table 3, Indicator number 13				206
ESRS 2 – SBM3 – S1 Risk of incidents of child labor, paragraph 14 g)	Annex I, Table 3, indicator no. 12				206
ESRS S1-1 Human rights policy commitments, paragraph 20	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator no. 11				212

ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 21			Commission Delegated Regulation (EU) 2020/1816, Annex II		212
ESRS S1-1 processes and measures for preventing trafficking in human beings, paragraph 22	Annex 1, Table 3, Indicator no. 11				213
ESRS S1-1 workplace accident prevention policy or management system, paragraph 23	Annex 1, Table 3, Indicator no. 1				213
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	Annex I, Table 3, indicator no. 5				215
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 b) and c)	Annex I, Table 3, indicator no. 2		Commission Delegated Regulation (EU) 2020/1816, Annex II		229, 230
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Annex I, Table 3, Indicator no. 3				230
ESRS S1-16 Unjust gender pay gap, paragraph 97 a)	Annex I, Table 1, Indicator no. 12		Commission Delegated Regulation (EU) 2020/1816, Annex II		230
ESRS S1-16 Excess pay gap in favor of the CEO, paragraph 97 b)	Annex I, Table 3, Indicator no. 8				231
ESRS S1-17 Incidents related to discrimination, paragraph 103 a)	Annex I, Table 3, Indicator no. 7				231
ESR S1-17 Failure to observe the United Nations and OECD guiding principles on business and human rights, paragraph 104 a)	Annex 1, Table 1, Indicator number 10 and Annex 1, Table 3, Indicator no. 14		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818		231
ESRS 2 SBM-3 – S2 Severe risk of child labor or forced labor in the value chain, paragraph 11 b)	Annex I, Table 3, Indicators 12 and 13				232
ESRS S2-1 Human rights policy commitments, paragraph 17	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator no. 11				234
ESRS S2-1 Policies related to value chain workers, paragraph 18	Annex I, Table 3, Indicators 11 and 4				235
ESRS S2-1 Failure to observe the United Nations and OECD guiding principles on business and human rights and the OECD guidelines, paragraph 19	Annex I, Table 1, Indicator no. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818		235
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		235

ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Annex I, Table 3, Indicator no. 14				238
ESRS S3-1 Human rights policy commitments, paragraph 16	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator no. 11				241
ESRS S3-1 Failure to observe the UNGPs on Business and Human Rights, ILO principles or and OECD guidelines, paragraph 17	Annex I, Table 1, Indicator no. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818		241
ESRS S3-4 Human rights issues and incidents, paragraph 36	Annex I, Table 3, Indicator no. 14				243
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Annex 1, Table 3, Indicator number 9 and Annex 1, Table 1, Indicator no. 11				249
ESRS S4-1 Failure to observe the United Nations and OECD guiding principles on business and human rights and the OECD guidelines, paragraph 17	Annex I, Table 1, Indicator no. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12 (1), of Delegated Regulation (EU) 2020/1818		249
ESRS S4-4 Human rights issues and incidents, paragraph 35	Annex I, Table 3, Indicator no. 14				256
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 b)	Annex I, Table 3, Indicator no. 15				-
ESRS G1-1 Protection of whistleblowers, paragraph 10 d)	Annex I, Table 3, Indicator no. 6				-
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 a)	Annex I, Table 3, Indicator no. 17		Annex II of Delegated Regulation (EU) 2020/1816		266
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 b)	Annex I, Table 3, Indicator no. 16				266

[57]: Climate change has been considered significant and therefore the disclosure requirements of ESRS E1 “Climate Change” will be reported.

[59]: Material impacts, risks, and opportunities, identified according to the criteria and thresholds outlined in IRO 1 “Description of the process for identifying and assessing material impacts, risks, and opportunities” datapoints [53 b iv) and [53 c ii)], in order to determine the material information to be disclosed were associated with the topics, sub-topics, and sub-sub-topics consistent with what is in ESRS 1, Section 3.2 Material Issues and Materiality of Information and Appendix A.

## 2. ENVIRONMENTAL INFORMATION

### Taxonomy

#### Implementation of the European Taxonomy in the TIM Group

The European Taxonomy, pursuant to Regulation 2020/852 of June 20, 2020 and Delegated Regulation 2021/2178 of 6 July 2021, is a classification system that aims to provide a clear and consistent picture of economic activities that can be considered environmentally sustainable.

In this section, the TIM Group's economic activities that fall under the definitions of environmentally sustainable activities contained in the legislation and, therefore, are likely to contribute substantially to one, or more, of the six environmental objectives pursued by the European Union are explained:

1. climate change mitigation
2. adaptation to climate change
3. sustainable use and protection of water and marine resources
4. transition to a circular economy
5. pollution prevention and reduction
6. protection and restoration of biodiversity and ecosystems.

Economic activities are defined as sustainable, that is, "aligned" with the Taxonomy, if they simultaneously meet the following conditions:

- contribute substantially to one or more of the EU's six environmental objectives;
- do not cause significant harm to any of the other taxonomic objectives, the principle of "Do No Significant Harm" - DNSH;
- are carried out in compliance with the Minimum Safeguards adopted by companies to ensure responsible business conduct;
- comply with the Technical Screening Criteria-TSC established by the European Commission.

The TIM Group conducted the eligibility analysis and alignment of its activities with the European Taxonomy with regard to all six environmental objectives, but, compared to previous years, it had a different business scope as a result of the contribution to FiberCop of the business unit including the fixed network infrastructure and wholesale activities on July 1, 2024. The results reflect the new business perimeter, thus determining a discontinuity in the comparability of values compared to the previous year.

The economic activities identified belong to the following Group companies: TIM S.p.A., Noovle S.p.A., Olivetti S.p.A., TI Sparkle S.p.A. and TIM S. A. (Brazil business unit).

#### The scope of eligibility of the TIM Group<sup>5</sup>

The identification of eligible economic activities consisted of four phases:

- **a desk analysis** to compare the TIM Group's business with the classification of sustainable economic activities provided by the regulations;
- **the preparation of the list** of potentially eligible activities;
- **validation of the list** through interaction with the business functions in charge of the activities;
- **collection of information acquired** through the ESG Platform to formalize the process.

At the end of this process, **78 activities** were mapped.

Below is a table with a summary of the economic activities included in the scope of eligibility of the TIM Group.

<sup>5</sup> Delegated Regulation 2021/2178, paragraph 1.2.2. — Assessment of compliance with Regulation (EU) 2020/852



Economic activities	Description of TIM activities	Objective	Company
4.1 Power Generation by Photovoltaic Solar Technology	<ul style="list-style-type: none"> <li>• <b>Powering of the network</b> with electricity generated by photovoltaic solar technology. Energy is produced by 113 power plants.</li> <li>• <b>4G mobile connectivity</b> generated by solar-powered antennas from satellite-connected solar panels. This activity makes it possible to bring coverage even to remote areas of the country that are more difficult to reach and connect.</li> </ul>	Mitigation to climate change/ Adaptation to climate change	TIM S.A.
4.5 Power generation starting from hydroelectric energy	<ul style="list-style-type: none"> <li>• <b>Powering the network</b> with electricity generated from hydroelectric energy. Energy is produced by 14 power plants.</li> </ul>	Mitigation to climate change/ Adaptation to climate change	TIM S.A.
4.8 Power generation from bioenergy	<ul style="list-style-type: none"> <li>• <b>Powering the network</b> with electricity generated from bioenergy. Energy is produced by 2 power plants.</li> </ul>	Mitigation to climate change/ Adaptation to climate change	TIM S.A.
4.30 High-performance cogeneration of heat/cold and electricity from gaseous fossil fuels	<ul style="list-style-type: none"> <li>• <b>Operation and maintenance of three high-efficiency cogeneration plants</b> in data centers for combined heat/cool and power generation, with benefits in terms of reduced losses from separate power generation and fuel savings.</li> </ul>	Mitigation to climate change/ Adaptation to climate change	Noovle S.p.A.
5.1 Construction, expansion and management of water collection, treatment and supply systems	<ul style="list-style-type: none"> <li>• <b>Implementation of a remote water monitoring system</b> to monitor and report water consumption in Core and Public Cloud Data Centers using the Water Usage Effectiveness (WUE) indicator</li> </ul>	Mitigation to climate change/ Adaptation to climate change	Noovle S.p.A.
7.3. Installation, maintenance and repair of energy efficiency devices	<p><b>Extraordinary or evolutionary maintenance for Data Centers</b> that consists of:</p> <ul style="list-style-type: none"> <li>• repair and efficiency improvement of industrial assets or ancillary services serving the Data Center;</li> <li>• technological refresh for obsolescence with the installation of more performing industrial equipment in terms of energy efficiency</li> </ul>	Mitigation to climate change/ Adaptation to climate change	Noovle S.p.A.
7.5 Installation, maintenance and repair of tools and devices for measuring, regulating and controlling the energy performance of buildings	<ul style="list-style-type: none"> <li>• <b>Implementation of new energy meters</b> in the data centers used by the National Strategic Plan (NSP) to improve the monitoring and efficiency of energy consumption;</li> <li>• <b>Installation of new meter for monitoring the remaining autonomy of uninterruptible power supplies (UPSs)</b> to check load and unload levels;</li> <li>• <b>Installation of new probes for temperature and humidity detection;</b></li> <li>• <b>Implementation of temperature monitoring sensors</b> in building management systems and refrigeration units, to optimize climate control and energy efficiency.</li> </ul>	Mitigation to climate change/ Adaptation to climate change	Noovle S.p.A.
7.6 Installation, Maintenance, and Repair of Renewable Energy Technologies	<ul style="list-style-type: none"> <li>• <b>Construction of two new photovoltaic systems</b>, one at the West Milan site and one at the West Turin site.</li> </ul>	Mitigation to climate change/ Adaptation to climate change	Noovle S.p.A.

8.1 Data processing, hosting and related activities	<p><b>Data processing, hosting and related activities carried out in TIM Group Data Centers.</b> Specifically:</p> <ul style="list-style-type: none"> <li>cloud infrastructure services that enable TIM to implement digital solutions characterized by maximum efficiency, modularity, scalability, and security;</li> <li>data center services, i.e. colocation solutions, housing and value-added infrastructure services.</li> </ul> <p><b>Noovle Data Centers</b> They are distributed throughout the country for a total of 50,000 square meters of systems rooms and approx. 100.8 MW of power available at the Points of Delivery (POD) of the electrical cabinets. There are 7 Core Data Center offering maximum-performance cloud and colocation services; 6 Public Cloud Data Centers, where the platforms of the largest international public cloud providers operate with the highest levels of performance; 3 Service Centers i.e., secure and reliable micro-data centers near customer locations. A high-speed network connects Data Centers to provide low-latency business continuity and disaster recovery solutions between Noovle Data Centers or between Noovle Data Centers and the customer's site. Noovle Data Centers host both "market solutions," that is, digital services offered in the market by TIM and other Group companies, including Olivetti; and "captive solutions," i.e., digital services that support the business and operations of TIM itself and other TIM Group companies. This is complemented by Disaster Recovery and Proximity solutions to ensure security and territorial coverage.</p> <p><b>Sparkle Data Centers</b> They offer colocation services on a global scale. Data centers in Greece include a total area of 14,000 square meters; three are located in Athens in the areas of Koropi and Metamorfosis (Tier III certificate) and one in Chania on the island of Crete. Data Center in Turkey, located in Yenibosna, is one of the largest and most important colocation facilities in Turkey. Thanks to its neutrality, it houses the majority of national and international suppliers. Data Center in Panama is located in Corozal and is one of the largest and most important open colocation facilities in Panama. The New Generation Data Center platform is designed to meet the needs of customers looking to expand their presence in Central America. Data Centers occupy a total area of about 1,750 square meters and the total installed power is 4.7 MW between the Milan and Palermo Data Centers. The last-named center, Sicily Open Data Center, is a Data Center that allows customers to be managed in colocation through state-of-the-art data security technologies. In addition, there are other Landing Hubs for submarine cable systems in the Italian territory.</p> <p><b>TIM S.A. Data Center in Brazil</b> Certifications: data centers are certified to ABNT NBR 15247 offering the highest level of physical security for rooms, considering fire resistance and other levels of protection not covered by other certifications, such as: protection against fire, heat, humidity, water, improper access and breaking and entering - as well as redundant electrical and air conditioning facilities. 30% of TIM S.A.'s Data Centers. (100% of IT DCs) are covered by ISO 14001 certification. Security: buildings where data centers are located have an Atmospheric Discharge Protection System (ADPS). The rooms have fire fighting systems (SDAEI) and raised floors. Water management: the air-conditioning system has sensors that warn of low water levels and cut off the supply. Energy consumption: the average PUE in 2024 was 1.64, achieving the goal of keeping this parameter below 1.66.</p>	Mitigation to climate change/ Adaptation to climate change	TIM S.p.A. Olivetti S.p.A. Telecom Italia Sparkle S.p.A. TIM S.A. Noovle S.p.A.
8.3 Programming and broadcasting activities	<ul style="list-style-type: none"> <li><b>Programming and broadcasting of audiovisual content</b> delivered through the marketing of the TIMVISION offering. The offer includes movies, TV series, sports and other entertainment programs that can be enjoyed by taking out a monthly subscription, which also includes a range of content that can be purchased (thus enjoyed countless times) or rented (thus enjoyed for a limited period).</li> </ul>	Adaptation to climate change	TIM S.p.A.
5.3 Preparing for reuse of end-of-life products and product components	<ul style="list-style-type: none"> <li><b>Reuse of "decommissioned equipment" located at the customer's premises</b> (Customer Premises Equipment) such as modems and routers. The initiative envisages that the material is collected, evaluated and, depending on the conditions, put through the reconditioning process for a new use.</li> <li><b>Trade-in program on mobile phones and smartwatches</b> where customers can return their old devices and obtain a discount on the purchase of new models. All devices undergo a detailed evaluation and/or repair process to be reused/resold. Equipment that cannot be reused or reconditioned is sent for recycling.</li> </ul>	Transition to a circular economy	TIM S.A.
5.4. Sale of second-hand goods	<ul style="list-style-type: none"> <li><b>Offering of reconditioned smartphones (TIM).</b> In 2024, five grade A reconditioned models were in the price list, which guarantee customers high-quality devices at an affordable price and with a lower environmental impact. Smartphones, which can be purchased with immediate payment or installment solutions, are available at TIM outlets and on digital channels. TIM purchases products from specialized suppliers that perform reconditioning through a rigorous process of repairing, replacing and updating damaged or worn components.</li> <li><b>Supply of regenerated toners (Olivetti).</b> Regenerated cartridges are empty original cartridges that are refilled with toner and, if necessary, repaired before being reintroduced into the market. This process reduces waste and environmental impact while maintaining high print quality.</li> </ul>	Transition to a circular economy	TIM S.p.A. Olivetti S.p.A.

5.5. Product-as-a-Service and other service models geared towards circular use and results	<ul style="list-style-type: none"> <li>• <b>Rental of mobile devices, for Multibusiness customers.</b> The formula involves the rental of a number of smartphones equal to the users activated with the contract concluded with TIM, at the end of which, unless there are any renewals, the customer is required to return the rented devices. The initiative guarantees greater flexibility in the management of corporate devices, optimizing technological resources and contributing to the reduction of the environmental impact associated with the production and disposal of equipment.</li> </ul>	Transition to a circular economy	TIM S.p.A.
4.1. "Provision of solutions based on IT/OT (information technology/operational technologies) data for the reduction of losses	<p><b>Solutions for water network operators</b> that provide:</p> <ul style="list-style-type: none"> <li>• <b>Implementation of advanced telecontrol systems</b> for monitoring and management of water infrastructure. The initiative involves the use of an advanced technology, Supervisory Control and Data Acquisition (SCADA), which allows real time data collection from the various sensors, sending commands to devices to control and optimize operations and store the data collected, allowing historical analyses that can be used to improve operational efficiency;</li> <li>• <b>Maintenance of remote control systems</b> in the water sector, with monitoring of water pressure and flow to promptly identify any leaks and activate rapid actions.</li> </ul>	Sustainable use and protection of water and marine resources	Olivetti S.p.A.

## Verification of alignment of technical screening criteria and DNSH

The verification activity required identification of the relevant technical functions. In some cases, the verification was the responsibility of a single function, in other cases it was necessary to involve multiple functions and/or even third parties that collaborate with the TIM Group in the management of eligible economic activities. Technical and DNSH criteria alignment analysis information has been consolidated on the ESG Platform to ensure accountability of the verification process. The analysis of the TIM Group's business activities showed that they are not aligned with the technical and DNSH criteria, but at the same time identified future investments needed to ensure regulatory compliance.

In relation to Activity 8.3 for the CCA objective, the TIM Group verified compliance with the eligibility criteria, including the analysis of climate risks on assets and the resulting adaptation plan.

## Verification of compliance with the Minimum Safeguard Guarantees

The TIM Group conducts its economic activities in compliance with the minimum safeguards set forth in Article 18 of EU Regulation 2020/852. In fact, the company's operations are subject to compliance with numerous policies and control tools in line with regulations.

### Human Rights

- membership of the United Nations Global Compact;
- adoption of the "Human Rights Policy" that applies to all employees and partners, at home and abroad, which includes issues such as human trafficking, forced labor, child labor, discrimination, freedom of association, collective bargaining, equal pay, and health and safety. It is inspired by the Group's "Code of Ethics" and referred to by the main corporate documents. In Brazil, TIM S.A. complements its commitment to human rights with its "Social Responsibility Policy."

### Corruption

- Compliance with the values expressed in the "Code of Ethics and Conduct."
- Adoption of the "Anti-Corruption Policy" that defines standards and rules to prevent corruption. In addition, in Brazil, TIM S.A. has implemented an "Anti-Corruption Management Manual" with related training for employees.
- Adoption of an Anti-corruption Management System in accordance with the UNI ISO 37001 standard.

### Taxation

- Tax strategy based on honesty, fairness and compliance, including cooperative and transparent behavior towards tax authorities and third parties in order to reduce impacts in terms of tax or reputational risk ("TIM Tax Strategy").
- Tax risk management and control system with stringent governance;
- Involvement of Top Management and the Tax Function in business decisions;
- Periodic review of the control system by the Board of Directors;
- Audit in accordance with Brazilian and international standards by TIM S.A.

### Fair Competition

- "Antitrust Code of Conduct" approved by the Board of Directors.
- Antitrust Compliance Program aimed at all employees;
- Regular training in antitrust matters;
- Adoption of the "Competition Defense Policy" by TIM S.A.

## Criteria for calculating the required KPIs for eligible and aligned activities

Below are the accounting criteria adopted for calculating the three KPIs required for eligible and aligned economic activities. The definition of these indicators was carried out in accordance with the provisions of Annex I of Delegated Regulation (EU) 2021/2178.

KPI	Description	References to the Consolidated Financial Statements
<b>Turnover</b>	<p>The <b>numerator</b> is the net revenues associated with the sale of Group products and services related to activities eligible and/or aligned with the EU Taxonomy, as explained in point 1.1.1 of the Delegated Act.</p> <p>The <b>denominator</b> is identified by referring to the item “revenues” of the Consolidated Overall Income Statement as at 2024, drawn up in accordance with the provisions of accounting standard IAS 1.82(a).</p>	Note 26: Revenues
<b>CapEx</b>	<p>The <b>numerator</b> indicates the share of capital expenses recognized in the assets of the consolidated financial statements, associated with eligible activities and defined on the basis of the criteria pursuant to point 1.1.2.2 of the Delegated Act.</p> <p>The <b>denominator</b> includes increases in tangible and intangible assets during the year considered before depreciation, amortization, impairment and any revaluation, including those arising from restatements and reductions in value and excluding changes in fair value. The denominator also includes increases in tangible and intangible assets resulting from business combinations.</p>	Note 5, 6 and 7: Intangible assets with finite useful life, tangible assets and rights of use assets
<b>OpEx</b>	<p>The <b>numerator</b> refers to the share of operating expenses associated with eligible activities and defined based on the criteria set out in point 1.1.3.2 of the Delegated Act. To avoid the risk of double-counting, only eligible and aligned operating expenses directly linked to economic activities that meet the Taxonomy criteria were considered.</p> <p>The <b>denominator</b> shows the total operating expenses quantified based on the criteria set out in point 1.1.3.1 of the Delegated Act and is the proportion of direct non-capitalized costs related to research and development, building renovation measures, short-term rental, maintenance and repair as well as to any other direct expense related to the daily maintenance of buildings, plants and machinery of the Delegated Act.</p>	The OpEx defined by the European Taxonomy differs from that indicated in the consolidated financial statements, since it includes only the direct costs of maintaining and repairing tangible assets, excluding many other corporate operating expenses. This aspect makes direct reconciliation difficult, since these costs can be distributed across different accounting items in the consolidated financial statements.

The data relating to turnover, operating expenses and capital expenses for eligible activities aligned with the Taxonomy, used for the calculation of performance indicators (KPIs) was extracted from the general accounting and analytical systems of the Group's consolidated companies. Where it was not possible to break down the economic amounts in a precise manner, a management estimate was used. Where necessary, the accounting data has been adjusted to ensure compliance with the IFRS adopted in the TIM Group's consolidated financial statements, also applying appropriate consolidation deletions (intercompany transactions, elimination of internal profits, etc.).

### Contextual information on the KPI related to turnover<sup>6</sup>

With regard to the Turnover KPI, the eligible net revenues of €107,652.48k which contribute to this indicator, are broken down as follows:

- Activity 5.3 CE - preparing for reuse of end-of-life products and product components: €567.69k
- Activity 5.4 CE - sale of second-hand goods: €244k
- Activity 5.5 CE - rental of mobile devices: €3,736k
- Activity 8.1 CCM - data processing, hosting, and related activities: €102,926k
- Activity 4.1. WTR - provision of solutions based on IT/OT (information technology/operational technologies) data for the reduction of losses: €178.79k

### Contextual information on the KPI related to operating expenses<sup>7</sup>

With regard to the CapEx KPI, capital expenditures and asset increases that form the KPI numerator equal to €78,799,07k are broken down as follows:

- Activity 5.1 CCM - construction, expansion and management of water collection, treatment and supply systems: €250.17k
- Activity 5.5 CE - rental of mobile devices: €2,757k
- Activity 7.3. CCM - Installation, maintenance and repair of energy efficiency devices: €176.43k

<sup>6</sup> Del. Reg. 2021/2178 — paragraph 1.2.3.1.

<sup>7</sup> Del. Reg. 2021/2178 — paragraph 1.2.3.2.

- Activity 7.5 CCM - Installation, maintenance and repair of tools and devices for measuring, regulating and controlling the energy performance of buildings: €360.66k
- Activity 7.6 CCM - installation, maintenance, and repair of renewable energy technologies: €333.90k
- Activity 8.1 CCM - data processing, hosting, and related activities: €45,922.91k
- Activity 8.3 CCA - programming and broadcasting activities: €28,998.00k

### Contextual information on the KPI related to operating expenses<sup>8</sup>

With regard to the OpEx KPI, the operating expenses that form the KPI numerator equal to €106,513.63k, are broken down as follows:

- Activity 4.1 CCM - power generated by photovoltaic systems: €18,663.65k
- Activity 4.5 CCM - power generated by hydroelectric systems: €5,415.20k
- Activity 4.8 CCM - power generated from bioenergy: €4,027.78k
- Activity 4.30 CCM - power generated from gaseous fossil fuels: €705.60k
- Activity 5.3 CE - preparing for reuse of end-of-life products and product components: €2,410.14k
- Activity 5.4 CE - sale of second-hand goods: €300.50k
- Activity 8.1 CCM - data processing, hosting, and related activities: €74,961.78k
- Activity 4.1. WTR - provision of solutions based on IT/OT (information technology/operational technologies) data for the reduction of losses: €28.98k

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<sup>8</sup> Del. Reg. 2021/2178 — paragraph 1.2.3.3

## Models for fundamental performance indicators (KPIs) of non-financial firms

### Model — Share of turnover deriving from products or services associated with economic activities aligned with the taxonomy — Disclosure for the year 2024

2024 financial year	2024			Criteria for substantial contribution						DNSH ("Do No Significant Harm") criteria									
Economic activities	Code	Turnover	Turnover share, 2024	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Share of Taxonomy aligned (A.1) or eligible (A.2) turnover 2023	Enabling activity category	Transitional activity category
Text		€000	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T

#### A. ACTIVITIES ELIGIBLE FOR TAXONOMY

##### A.1 Environmentally sustainable activities (taxonomy-aligned)

aligned) (A.1)		0%	0%	0%	0%	0%	0%	0%	0%	No	No	No	No	No	No		0.023%		
Of which enabling		0%	0%	0%	0%	0%	0%	0%	0%	No	No	No	No	No	No		0.023%		
Of which transitional		0%	0%							No	No	No	No	No	No		0%		

##### A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned)

				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
4.1. "Provision of solutions based on IT/OT (information technology/operational technologies) data for the reduction of losses	WTR 4.1	178.79	0.001%	N/EL	N/EL	EL	N/EL	N/EL	N/EL										
5.3 Preparing for reuse of end-of-life products and product components	CE 5.3	567.69	0.004%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
5.4. Sale of second-hand goods	CE 5.4	244.00	0.002%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.01%		
5.5. Product-as-a-Service and other service models geared towards circular use and results	CE 5.5	3,736.00	0.03%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0.03%		
8.1 Data processing, hosting and related activities	CCM/CCA 8.1	102,926.00	0.71%	EL	EL	N/EL	N/EL	N/EL	N/EL								4.31%		
Turnover from activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		107,652.48	0.75%	0.71%	0.00%	0.001%	0.00%	0.04%	0.00%								5.84%		
A. Turnover of activities eligible for the taxonomy (A.1 + A.2)		107,652.48	0.75%	0.71%	0.00%	0.001%	0.00%	0.04%	0.00%								5.86%		

#### B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY

Turnover of activities not eligible for taxonomy	14,333,896.52	99.3%
Total	14,441,549.00	100.0%

	Share of turnover/Total turnover	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	0.00%	0.71%
CCA	0.00%	0.71%
WTR	0.00%	0.001%
CE	0.00%	0.04%
PPC	0.00%	0.00%
BIO	0.00%	0.00%



**Model — Share of capital expenditure (CapEx) deriving from products or services associated with economic activities aligned with the taxonomy — Disclosure relating to the year 2024**

2024 financial year	2024			Criteria for substantial contribution						DNSH ("Do No Significant Harm") criteria									
Economic activities	Code	CapEx	Share of CapEx, 2024	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Share of CapEx aligned with (A.1) or eligible (A.2) for the taxonomy, 2023	Enabling activity category	Transitional activity category
Text		€000	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes/ No	Yes/ No	Yes/ No	Yes/ No	Yes/ No	Yes/ No	Yes/ No	%	A	T

**A. ACTIVITIES ELIGIBLE FOR TAXONOMY**

**A.1 Environmentally sustainable activities (taxonomy-aligned)**

(A.1)		0%	0%	0%	0%	0%	0%	0%	0%	No	No	No	No	No	No		0.013%		
Of which enabling		0%	0%	0%	0%	0%	0%	0%	0%	No	No	No	No	No	No		0.013%		
Of which transitional		0%	0%							No	No	No	No	No	No		0%		

**A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned)**

				EL; N/ EL	EL; N/ EL	EL; N/ EL	EL; N/ EL	EL; N/ EL	EL; N/ EL										
5.1 Construction, expansion and management of water collection, treatment and supply systems	CCM/CCA 5.1	250.17	0.01%	EL	EL	N/EL	N/EL	N/EL	N/EL										
5.5. Product-as-a-Service and other service models geared towards circular use and results	CE 5.5	2,757.00	0.10%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
7.3. Installation, maintenance and repair of energy efficiency devices	CCM/CCA 7.3	176.43	0.01%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.60%		
7.5 Installation, maintenance and repair of tools and devices for measuring, regulating and controlling the energy performance of buildings	CCM/CCA 7.5	360.66	0.01%	EL	EL	N/EL	N/EL	N/EL	N/EL										
7.6 Installation, Maintenance, and Repair of Renewable Energy Technologies	CCM/CCA 7.6	333.90	0.01%	EL	EL	N/EL	N/EL	N/EL	N/EL										
8.1 Data processing, hosting and related activities	CCM/CCA 8.1	45,922.91	1.61%	EL	EL	N/EL	N/EL	N/EL	N/EL								2.21%		
8.3 Programming and broadcasting activities	CCA 8.3	28,998.00	1.02%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.31%		
CapEx of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		78,799.07	2.77%	1.65%	1.02%	0.000%	0.00%	0.10%	0.00%								5.96%		
A. CapEx of taxonomy-eligible for activities (A.1 + A.2)		78,799.07	2.77%	1.65%	1.02%	0.000%	0.00%	0.10%	0.00%								5.97%		

**B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY**

CapEx of activities not eligible for taxonomy	2,769,443.93	97.23%
Total	2,848,243.00	100.00%

	Share of CapEx/Total CapEx	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	0.00%	1.65%
CCA	0.00%	2.67%
WTR	0.00%	0.00%
CE	0.00%	0.10%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

**Model — Share of operating expenses (OpEx) deriving from products or services associated with economic activities aligned with the taxonomy — Disclosure relating to 2024**

2024 financial year	2024			Criteria for substantial contribution						DNSH ("Do No Significant Harm") criteria									
Economic activities	Code	OpEx	Share of OpEx, 2024	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Share of OpEx aligned with (A.1) or eligible (A.2) for the taxonomy, 2023	Enabling activity category	Transitional activity category
Text		€000	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T

**A. ACTIVITIES ELIGIBLE FOR TAXONOMY**

**A.1 Environmentally sustainable activities (taxonomy-aligned)**

Operating expenses of environmentally sustainable activities (taxonomy-aligned) (A.1)			0%	0%	0%	0%	0%	0%	0%	No	No	No	No	No	No		0%		
Of which enabling			0%	0%	0%	0%	0%	0%	0%	No	No	No	No	No	No		0 %		
Of which transitional			0%	0%						No	No	No	No	No	No		0 %		

**A.2 Activities eligible for taxonomy but not environmentally sustainable (activities not taxonomy-aligned)**

				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
4.1 Power generation by solar and photovoltaic technology	CCM/CCA 4.1	18,663.65	1.32%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.78%		
4.1."Provision of solutions based on IT/OT (information technology/operational technologies) data for the reduction of losses	WTR 4.1	28.98	0.002%	N/EL	N/EL	EL	N/EL	N/EL	N/EL										
4.30 Mitigation High-performance cogeneration of heat/ cold and electricity from gaseous fossil fuels	CCM/CCA 4.30	705.60	0.05%	EL	EL	N/EL	N/EL	N/EL	N/EL										
4.5 Power generation from hydropower	CCM/CCA 4.5	5,415.20	0.38%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.33%		
4.8 Power generation from bioenergy	CCM/CCA 4.8	4,027.78	0.29%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.16%		
5.3 Preparing for reuse of end-of-life products and product components	CE 5.3	2,410.14	0.17%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
5.4. Sale of second-hand goods	CE 5.4	300.50	0.02%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
8.1 Data processing, hosting and related activities	CCM/CCA 8.1	74,961.78	5.31%	EL	EL	N/EL	N/EL	N/EL	N/EL								11.44%		
Operating expenses of activities eligible for the taxonomy but not environmentally sustainable (activities not taxonomy-aligned) (A.2)		106,513.63	7.55%	7.35%	0.00%	0.002%	0.00%	0.19%	0.00%								12.71%		
A. OpEx of taxonomy-eligible activities (A.1 + A.2)		106,513.63	7.55%	7.35%	0.00%	0.002%	0.00%	0.19%	0.00%								12.71%		

**B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY**

Operating expenses of activities not eligible for taxonomy	1,305,043.37	92.45%
Total	1,411,557.00	100.00%

	Share of OpEx/Total OpEx	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	0.00%	7.35%
CCA	0.00%	7.35%
WTR	0.00%	0.002%
CE	0.00%	0.19%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

**Model 1 - Nuclear and fossil gas related activities**

Line	Activities related to nuclear energy	
1	The company carries out, finances or has exposure to research, development, demonstration and construction of innovative plants for the generation of electrical energy that produce energy from nuclear processes with a minimum amount of waste from the fuel cycle.	No
2	operation of new nuclear plants for the generation of electrical energy or process heat, also for district heating purposes or for industrial processes such as the production of hydrogen, and improvements to their safety, with the aid of the best available technologies.	No
3	The company carries out, finances or has exposure to the safe operation of existing nuclear plants that generate electrical energy or process heat, including for district heating or for industrial processes such as the production of hydrogen from nuclear energy, and improvements in their safety.	No
<b>Activities related to fossil gases</b>		
4	The company carries out, finances or has exposure to the construction or management of plants for the production of electricity that use gaseous fossil fuels.	No
5	The company carries out, finances or has exposure to the construction, redevelopment and management of combined heat/cold and electricity generation plants that use gaseous fossil fuels.	Yes
6	The company carries out, finances or has exposure to the construction, redevelopment and management of heat generation plants that generate heat/cold using gaseous fossil fuels.	No

**Model 2 - Economic activities aligned with the taxonomy (denominator)**

Line	Economic activities	Turnover						CapEx						OpEx					
		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and share of economic activity aligned with the taxonomy referred to in section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
2	Amount and share of economic activity aligned with the taxonomy referred to in section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
3	Amount and share of economic activity aligned with the taxonomy referred to in section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
4	Amount and share of economic activity aligned with the taxonomy referred to in section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
5	Amount and share of economic activity aligned with the taxonomy referred to in section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %
6	Amount and share of economic activity aligned with the taxonomy referred to in section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
7	Amount and share of other economic activities aligned with the taxonomy not included in lines 1 to 6 in the denominator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %
8	<b>Total applicable KPI</b>	14,441,549.00	100 %	14,441,549.00	100 %	14,441,549.00	100 %	2,848,243.00	100 %	2,848,243.00	100 %	2,848,243.00	100 %	1,411,557.00	100 %	1,411,557.00	100 %	1,411,557.00	100 %

**Model 3 - Economic activities aligned with the taxonomy (numerator)**

Line	Economic activities	Turnover						CapEx						OpEx					
		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and share of economic activity aligned with the taxonomy referred to in section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
2	Amount and share of economic activity aligned with the taxonomy referred to in section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
3	Amount and share of economic activity aligned with the taxonomy referred to in section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
4	Amount and share of economic activity aligned with the taxonomy referred to in section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
5	Amount and share of economic activity aligned with the taxonomy referred to in section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %
6	Amount and share of economic activity aligned with the taxonomy referred to in section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the numerator of the applicable KPI																		
7	Amount and share of other economic activities aligned with the taxonomy not included in lines 1 to 6 in the numerator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %
8	Total amount and share of economic activities aligned with the taxonomy in the numerator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %



**Model 4 — Eligible economic activities not aligned with the taxonomy**

Line	Economic activities	Turnover						CapEx						OpEx					
		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		CCM+CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
2	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
3	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
4	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
5	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %	0.00	0 %
6	Amount and share of economic activity eligible for but not aligned with the taxonomy referred to in section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI																		
7	Amount and share of other economic activities eligible for but not aligned with the taxonomy not included in lines 1 to 6 in the denominator of the applicable KPI	102,926.00	100 %	102,926.00	100 %	0.00	100 %	76,042.07	100 %	47,044.07	100 %	28,998.00	100 %	103,774.01	100 %	103,774.01	100 %	0.00	100 %
8	Total amount and share of economic activities eligible for but not aligned with the taxonomy in the denominator of the applicable KPI	102,926.00	100 %	102,926.00	100 %	0.00	100 %	76,042.07	100 %	47,044.07	100 %	28,998.00	100 %	103,774.01	100 %	103,774.01	100 %	0.00	100 %

Model 5 — Economic activities not eligible for taxonomy							
Line	Economic activities	Turnover		CapEx		OpEx	
		Amount	Percentuale	Amount	Percentuale	Amount	Percentuale
1	Amount and share of economic activity referred to in line 1 of model 1 that is not eligible for the taxonomy in compliance with section 4.26 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
2	Amount and share of economic activity referred to in line 2 of model 1 that is not eligible for the taxonomy in compliance with section 4.27 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
3	Amount and share of economic activity referred to in line 3 of model 1 that is not eligible for the taxonomy in compliance with section 4.28 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
4	Amount and share of economic activity referred to in line 4 of model 1 that is not eligible for the taxonomy in compliance with section 4.29 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
5	Amount and share of economic activity referred to in line 5 of model 1 that is not eligible for the taxonomy in compliance with section 4.30 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0 %	0.00	0 %	0.00	0 %
6	Amount and share of economic activity referred to in line 6 of model 1 that is not eligible for the taxonomy in compliance with section 4.31 of Annexes I and II of delegated regulation (EU) 2021/2139 in the denominator of the applicable KPI						
7	Amount and share of other economic activities not eligible for the taxonomy not included in lines 1 to 6 in the denominator of the applicable KPI	14,333,896.52	100 %	2,769,443.93	100 %	1,305,043.37	100 %
8	Total amount and share of economic activities not eligible for the taxonomy in the denominator of the applicable KPI	14,333,896.52	100 %	2,769,443.93	100 %	1,305,043.37	100 %

## Climate Change [ESRS E1]

### E1- Strategy

#### Disclosure Requirement E1-1 – Transition plan for climate change mitigation

**[17]:** The TIM Group, leader in telecommunications and ICT solutions in Italy and Brazil, intends to promote technological innovation and responsible digitalization, contributing to the well-being of people and communities. This approach is part of a framework that takes advantage of the opportunities of low-impact technologies and the circular economy, while helping to reduce the risks and impacts associated with climate change and the rapid increase in voice and data traffic, a phenomenon typical of the ICT sector.

In this scenario, **the Group's environmental strategy focuses on the progressive decarbonization of its activities and those related to the supply chain, both in Italy and Brazil**, through levers that include: the adoption of innovative technologies and resilient assets that guarantee high performance and the containment of energy consumption; the complete use of renewable energy, also through investment in self-production plants and in distributed generation projects; the promotion of circular models to reduce waste; the purchase of solutions and products with a certified carbon footprint.

2023 and 2024 were years of significant discontinuity in the measurement of the company's emissions. In 2023, TIM made a significant effort to improve the Scope 3 calculation methodology, which produced more reliable results, but at the same time, made it impossible to compare the emission performance with those of previous years.

Furthermore, on July 1, 2024, the completion of TIM's delayering plan through the sale of fixed network infrastructure assets to Kohlberg Kravis Roberts & Co. L.P. ("KKR") determined not only a different corporate structure, but also a significant change in the operating perimeter in terms of consistency of both infrastructure assets and personnel.

These significant changes in the company's structure and activities not only no longer allow the comparison of emission performance with those of previous years, requiring a new starting point from which to calculate progress, but they also affect the Group's decarbonization process, making it necessary to define a new Transition Plan. This will also involve a new validation of environmental objectives by the SBTi as required by the institution's recommendations in such cases.

However, the new structure of the company does not change the long-term strategic direction in environmental matters undertaken five years ago. In fact, as early as 2020, the Group identified specific long-term environmental targets aimed at ensuring the transition to a low carbon economy, such as the target of "100% purchase of renewable energy" to be reached by 2025 and "Carbon Neutrality" target, which, in addition to the mitigation of Scopes 1 and 2, also includes the use of neutralization actions for residual emissions to be reached by 2030.

In 2022, to accelerate the process of reducing greenhouse gas emissions, TIM also included in the ESG Plan the "Net zero" target by 2040 and an intermediate target relating to the reduction of supply chain emissions (deriving from the acquisition of goods and services and the use of the products sold) by 2030.

In the same year, the climate strategy was validated by the Science Based Targets initiative (SBTi), which confirmed its consistency with the objective of keeping global warming under 1.5°C, as established by the Paris Agreement on climate change.

On this occasion, the TIM Group committed itself to reducing absolute Scope 1 and 2 GHG emissions by 75% by 2030 compared to the 2019 reference year, in addition to confirming the supply of 100% renewable electricity by 2025 and the intermediate target relating to the reduction of supply chain emissions.

The announced commitments take into account the SBTi Criteria and Recommendations (version 4.2, April 2021), and have been defined on the basis of a structured transition plan to guarantee an annual emission reduction percentage in order to maintain the 1.5°C commitment.

Also in the 2025-27 Strategic Plan, TIM confirmed all the previous main emission targets, inserting a new intermediate target that consists in the drafting of a new transition plan for the 2025-2030 five-year period and which will have to set the decarbonization levers to be put in place in order to achieve the long-term environmental targets.

The plan will be presented and approved by the Group BOD in time for the 2025 Report. Starting from an assessment of the Company's current situation, including the analysis of risks and opportunities related to sustainability, the plan will contain evidence of the measures and initiatives necessary to achieve the long-term targets for decarbonization, as well as a rough indication of the indicators to measure progress and the financial, human and technical resources necessary for the implementation of the plan.

#### Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

**[E1 SBM-3, 18]:** In relation to the material risks connected to climate change that have been identified through the double materiality analysis, the following are the risks divided between transition risks and physical risks related to the climate.

### Transition risks

- *The inability to effectively involve “suppliers in the reduction of emissions can cause the failure to achieve the climate objectives, with an impact on economic and financial results as well as reputational damage”*
- *“Regulatory changes to energy and environmental policies may affect the profitability of energy efficiency actions and the use of renewable sources, with a possible increase in compliance costs”*

### Physical risks

- *“Extreme weather events due to climate change can create discontinuity in business activities, damage infrastructure and consequently affect the company's economic and financial flows”.*

**[E1 SBM-3, 19 a]:** The TIM Group assesses the resilience of its strategies regarding climate change through the analysis of physical and transition risks, involving Fibercop and all suppliers undergoing ESG assessments.

The Enterprise Risk Management process identifies and assesses risks related to rising temperatures and extreme weather events in the short, medium and long term, as further detailed in the IRO-1 disclosure requirement "Description of the process to identify and assess material impacts, risks and opportunities," to which reference is made for detail.

In addition, the Enterprise Risk Management function, in collaboration with the Sustainability function, has developed a methodology for the assessment and monitoring of ESG risks with an approach based on Key Risks. For risks that are judged as strategic, the assessment uses a probabilistic framework supplemented by statistical-mathematical models to measure risks at both the individual factor and portfolio levels, considering correlations among them. The results provide probability distributions over multiple scenarios and a view of the economic impact in the worst (5th percentile) and best (95th percentile) scenarios.

Climate risks, both transitional and physical, are assessed against climate trends to identify potential business risks and opportunities that may have a financial or strategic impact for the organization in the short, medium, and long term.

The climate changes recorded in recent years have generated extreme weather situations, including intense rain phenomena (flash floods) and storms with strong winds. The nationwide distribution of assets thus exposes the company to possible direct and indirect damage. In order to assess the potential damage to assets and manage their risks, TIM uses specific tools (for example CLIMADA) to assess the risk profile of the plants and to monitor their evolution over time. On plants considered strategic or critical, in addition to desk evaluations, on-site analyses are also carried out.

The company also conducts periodic probabilistic analyses to estimate the potential direct loss (damage to assets) deriving from the occurrence of adverse weather phenomena such as storms/floods/rivers bursting their banks, also in order to assess the transfer of this risk to the insurance market.

The Company has conducted specific risk analyses taking into consideration two scenarios aligned with keeping global temperature below 1.5°C, from among those proposed by the “Network for Greening the Financial System, (NGFS) (see disclosure requirement E1 IRO-1 “Description of processes to identify and assess material climate-related impacts, risks, and opportunities” where the narratives, time horizons, parameters used, key forces and drivers of each scenario, and key inputs and constraints of the scenarios are provided).

In order to ensure the continuity of the services provided and limit damage, the Company implements specific risk prevention actions such as flood protection systems, the geographical location of the plants and their redundancy.

Scenario-based risk analyses assess both the direct impact on assets (buildings and their technological content) and the potential damage deriving from the interruption of the service, with effects on the reduction of revenues and indirect damages related to the repercussions on end customers (claims).

Analyses on the estimation of climate change impacts (acute and chronic risks) do not currently take into account lightning and coastal flooding risks.

**[E1 SBM-3, 19 b]:** In conjunction with the establishment of the Strategic Plan, the TIM Group also cyclically initiates climate risk scenario analysis to support resilience strategies.

The latest available update is the one relating to the 2024-26 Plan carried out through the use of the simulation tool CLIMADA, which makes it possible to evaluate the economic risk associated with the risks of natural disasters such as earthquakes, floods, landslides, fires and extra-tropical storms, using numerous input data.

In a context of strong climate change, the use of risk assessment tools becomes crucial to allow companies to identify, quantify, and manage the risks associated with natural catastrophic events. That is why TIM decided to use one of the most advanced and widely used tools for this purpose. CLIMADA is an open-source model developed by the Swiss Center of Expertise for Climate Change Research and Disaster Prevention (C2SM) and the Center for Climate Risk and Resilience (OCCR) that enables the calculation of the probability and potential impact of natural catastrophic events, providing a scientific basis for climate-related risk assessment and management. With CLIMADA, TIM aims to improve its ability to calculate the probability of natural disasters, to assess their potential impact, to improve adaptation and mitigation strategies and to guide decisions regarding insurance coverage. The process of customizing this tool involves several phases including: data collection/analysis and adaptation to the TIM context; the simulation of the different scenarios; strategic planning and optimization of risk transfer plans to the insurance market.

In reference to mitigation actions and related resources put in place, see Environmental Information - disclosure requirement E1-3 “Actions and resources related to climate change policies”.

**[E1 SBM-3, 19 c]:** The resilience analyses carried out in the field of climate change help define the Group's action plans and, if necessary, cover residual risks through specific insurance coverage.

Below are the four main areas of action of the TIM Group identified by the ERM model to support risk mitigation and to seize opportunities related to climate change.

#### Products and services

The TIM Group:

- makes investments in ultra-broadband connectivity, to reduce the digital divide;
- develops and markets digital solutions that enable the ecological transition, such as cloud computing, smart working, telemedicine and smart agriculture.

The adoption of the cloud, in particular, makes it possible to optimize resources and reduce energy consumption, becoming one of the strategic levers for digitalization and economic development, as highlighted in the DESI Report on the digital transformation of Italy. For this reason, TIM has reinforced its commitment to the growth of the cloud business, focusing on scalable, secure and sustainable solutions.

#### Supply chain

TIM collaborates with suppliers to develop products with a low energy impact that allow customers to reduce their carbon footprint. This commitment is reflected in the following initiatives:

- insertion of ESG parameters and certifications related to the carbon footprint in the context of tenders for new products and services;
- integration and verification of environmental aspects in supplier audits, conducted as part of the Joint Alliance for CSR;
- escalation and follow-up procedures for non-compliant suppliers on aspects such as waste management, use of hazardous substances, energy consumption and regulatory compliance.

#### Investments in research and development

TIM invests in the search for innovative solutions that can improve energy efficiency, reduce emissions, promote the circular economy and environmental sustainability to consolidate the role of digitalization in the ecological transition, improving the quality of life through innovative resource management models.

#### Operations

TIM plans actions aimed at reducing the emission impact of its network infrastructure elements and data centers through the use of innovative technologies that allow improved performance with the same energy resources.

Without prejudice to the long-term direction of the Group's environmental strategy, the Company annually reviews the consistency of the adopted business model and evaluates any changes, with respect to the evolution of the climate scenario, through a review of the decarbonization levers.

## Impact, risk, and opportunity management

### Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation

**[24], [MDR-P, 65 a]:** The aspects of the IROs that emerged as significant from the dual relevance analysis for the topic "Climate Change" are covered in the policy "**Commitment to environmental sustainability in the TIM Group**", in the "**Product and Service Procurement Policy**" and in the "**Code of Ethics and Conduct of the TIM Group**".

All policies are linked to the following material impacts, risks and opportunities that emerged from the double materiality analysis:

#### Positive impact

- "Artificial intelligence and digital technologies allow better management of projects with a significant impact on the environment, such as the monitoring of environmental parameters (e.g. smart cities, smart agriculture) and the management of early warning systems".

#### Negative impacts

- "The construction and use of infrastructures (e.g. data centers) requires a high consumption of energy that can increase emissions with consequences on climate change";
- "The use of fossil energy sources helps to increase emissions with consequences on climate change".
- "The greater computing and data processing power required by the use of AI and digital technologies in business processes can increase energy consumption and the carbon footprint of the company or supply chain, affecting climate change";
- "The investments in infrastructures and the purchase of energy necessary for 5G, fiber optics and the cloud can affect climate change".

## Risks

- *"The inability to effectively involve "suppliers in the reduction of emissions can cause the failure to achieve the climate objectives, with an impact on economic and financial results as well as reputational damage";*
- *"Extreme weather events due to climate change can create discontinuity in business activities, damage infrastructure and consequently affect the company's economic and financial flows";*
- *"Regulatory changes to energy and environmental policies may affect the profitability of energy efficiency actions and the use of renewable sources, with a possible increase in compliance costs".*

The **"Commitment to environmental sustainability in the TIM Group"** Policy has the following main objectives:

- Ensure full compliance with current environmental laws and regulations;
- Adopt management systems and procedures that promote greater energy and resource efficiency and a lower emissive impact in infrastructure management, also thanks to advanced technologies that consider environmental sustainability aspects;
- Reduce greenhouse gas emissions through the adoption of environmentally sustainable technologies and the use of renewable energy; this includes both direct emissions (coming from its operations) and indirect emissions (related to energy purchased and used);
- Progressively reduce the consumption of energy deriving from fossil fuels, promoting the increasing use of energy from renewable sources;
- Invest in the development of low-carbon solutions, products and services, contributing to the energy transition towards a low-carbon economy;
- Choose suppliers and partners based on environmental sustainability criteria;
- Identify and evaluate the environmental risks of its supply chain, in collaboration with its suppliers and also through partnerships at national and international levels, taking appropriate corrective actions and implementing improvement plans to reduce the environmental impact of the products and services purchased.

The TIM Group also recognizes its role and responsibilities with regard to the UN Sustainable Development Goals, committing itself to applying policies, initiatives and behaviors consistent with the provisions, among others, of the objectives:

- **SDG 7:** ensure access to clean, cheap and sustainable energy for all;
- **SDG 9:** promote sustainable investments in the infrastructures necessary for the dissemination of communication technologies;
- **SDG 11:** disseminate the smart city model to make cities inclusive, safe, resilient and sustainable;
- **SDG 12:** promote efficiency in the use of resources and energy;
- **SDG 13:** act quickly to combat climate change and its impacts.

The **"Product and Service Procurement Policy"** defines the objectives and general principles of the TIM Group's purchasing process, including regulatory, contractual and control guidelines, and procurement commitments to environmental and social responsibility. Regarding IROs relevant to "Climate Change", the policy promotes environmental protection by valuing technical operational solutions in the procurement process that minimize impacts on the ecosystem. During the contracting phase, it is necessary to ensure that the parties' environmental obligations and responsibilities are clearly defined, with the goal of continuous improvement and alignment with industry best practices.

The **"Code of Ethics and Conduct"** guides TIM's actions in carrying out its business, in the belief that a common vision of ethics in the daily conduct of business is the essential prerequisite for responsible and sustainable growth. Specifically, the document includes:

- the distinguishing values of the Group's culture;
- the rules of ethical behavior for people in the Group and the guidelines for the conduct to be pursued in dealings with third parties;
- the objectives and good practices relating to sustainability and social responsibility, in order to conduct business activities in a way that safeguards the various aspects of the environmental, social and governance-related affairs of the Group;
- the methods of complying with the Code through the description of the commitment of corporate boards and management teams, as well as the approach to managing violations, whistleblowing, and the methods of disseminating and adopting of the document.

In relation to the IROs material to the subject of "Climate Change", the document highlights TIM's commitment to:

- Promote the energy transition, developing the business with the utmost respect for the environment, the rights of future generations and the applicable reference regulations;
- Reduce the negative impacts on the ecosystem that may be generated by activities, through the offering of services and solutions that promote new sustainable lifestyles.

To contextualize the Group's policies in the Brazilian business context, TIM S.A. has also defined the **"Climate Change Management" policy that addresses the aspects of climate change** adaptation and mitigation, energy efficiency and renewable energy. The policy aims to establish the principles to be applied in business activities to ensure the correct and efficient management of greenhouse gas emissions in accordance with current legislation, regulatory agencies and Group guidelines.

All indicated policies are subject to a constant monitoring process in order to ensure the constant pursuit of the principles and contents mentioned therein.

[24], [MDR-P, 65 b]: The "Commitment to Environmental Sustainability" Policy is valid at the Group level. In particular, the recipients of the document are all the Italian and foreign TIM Group companies, the TIM Foundation, Instituto TIM, the operating structures and corporate departments whose business may also have potentially significant impacts on the environment.

The Product and Service Procurement Policy is valid for all Group Companies and is directly applicable to purchases made by the Procurement Department, the purchasing functions, the function.

The Code of Ethics and Conduct applies to all people in the Group, with particular reference to the members of the Corporate Boards, management, employees of all Group Companies, external collaborators, and, where required by the company's procedural system, to third parties in business relationships with the Group.

[24], [MDR-P, 65 c]: The implementation of the "Commitment to Environmental Sustainability" Policy is entrusted to the head of the Corporate Communication and Sustainability Department who reports directly to the Chief Executive Officer.

The implementation of the 'Product and Service Procurement Policy' is guaranteed: by the Procurement Department in all its branches and responsibilities; by the Chief Financial Office Department that ensures, at the Group level, the oversight of financial, administrative and economic-management processes; by the Legal and Tax Department that ensures, at the Group level, legal protection, corporate compliance and the application of the governance model, as well as, the definition of tax policies.

The adoption of the Code of Ethics and Conduct was decided by a resolution of the TIM Board of Directors on March 15, 2023. A periodic review of the Code is also carried out to implement any necessary updates.

[24], [MDR-P, 65 d]: The "Commitment to Environmental Sustainability" Policy is in line with the main international reference standards such as ISO 14001, ISO 14064, ISO 50001 and the GHG Protocol.

For the "Product and Service Procurement" Policy, the external references are:

- Italian Legislative Decree 231/01 of 8/06/2001 - Regulations governing the administrative responsibility of legal persons, companies and associations with no legal status. (DC-2018-00498);
- Italian Legislative Decree 196/2003 - Data Protection Law. Data Protection Law (DC-2018-00069) and the Regulation (EU) 2016/679 General Data Protection Regulation (so-called. 'GDPR'), (DC-2018-00235);
- Presidential Decree 313/2002 Consolidated text of the legislative and regulatory provisions on criminal records, the register of administrative sanctions imposed due to a crime and related pending charges. (DC-2018-00559);
- Italian Legislative Decree 81/2008 - Consolidated Law on the protection of health and safety in the workplace and subsequent amendments. (DC-2018- 00556);
- Italian Legislative Decree 152/2006 'Consolidated Law on the Environment', as amended (DC-2018-00377);
- Consob Resolution no. 17221 of 12.3.2010-Regulation containing provisions on related-party transactions (DC-2018-00468);
- Italian Law no. 262 of December 28, 2005 - 'Provisions for the protection of savings and the regulation of financial markets' (DC-2018-00585). With regard to the Product and Service Procurement Policy, TIM operates within the framework of the Joint Alliance for Corporate Social Responsibility — JAC initiative (<http://jac-initiative.com>) of which the Group is a founding member. (1) JAC is a collective of telecommunications companies that aim to promote safe and fair working conditions, as well as responsible business, social and environmental management.

The Code of Ethics and Conduct is in line with the principles of the United Nations Global Compact with which TIM complies.

[24], [MDR-P, 65 e]: The Group policies specifically take into account aspects identified as being fundamental and high priority by analyses conducted internally and with external stakeholders. These aspects are strongly linked to the operations of the TIM Group Companies.

[24], [MDR-P, 65 f]: To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group's company website [www.gruppotim.it](http://www.gruppotim.it), in compliance with "least privilege" and "need to know" principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some of the documents, such as the Code of Ethics.

Information on TIM S.A.'s Policies, on the other hand, can be found on its institutional website <https://ri.tim.com.br> in the dedicated "Regulations and Policies" section.

[25]: In TIM's "Commitment to Environmental Sustainability" policy, TIM reaffirms its commitment to:

- Mitigation of climate change, with the objective of reducing or preventing greenhouse gas emissions to limit the magnitude of global warming. In line with the Policy, TIM defines long-term emission reduction targets in the business plan, promotes actions that reduce the amount of greenhouse gases and selects its suppliers and partners also based on environmental sustainability criteria;



- Adaptation to climate change, with the aim of reducing the vulnerability of the ecosystem to extreme weather events. With this in mind, TIM envisages measures to ensure the operational continuity of its infrastructures in the face of risks deriving from extreme weather events;
- Energy efficiency, implementing measures to improve the energy efficiency of its infrastructures and operations, thanks to the adoption of advanced technologies and sustainable management practices;
- The spread of renewable energy, promoting the use of sustainable energy sources in its operations and supply chain.

In the "Product and Service Purchasing" policy, TIM emphasizes, among the different phases of the purchasing process, the supplier qualification phase that also focuses on ESG aspects and the verification phase on contract execution where checks are made on the compliance of the specifications included in them with effects on the Vendor Rating index. Both phases are aimed at acquiring and retaining suppliers that contribute to climate change mitigation through the application of sustainable practices

## Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies

[28], [MDR-A, 68 a,b,c,d,e], [29 a] [MDR-A, 69 b, c], [29 c i,ii,iii], [16 c]: In addition to the climate change policies that provide the framework for the coherent and informed management of business activities, the Group implements actions and resources related to the mitigation of and adaptation to climate change and energy focused on:

1. use of energy from renewable sources;
2. reduction of energy and fuel consumption;
3. low-emission transport;
4. decarbonization of the supply chain;
5. additional emission mitigation initiatives.

The actions are aimed at various civil (such as offices) and industrial (such as Data Centers) business assets both in Italy and in Brazil, and involve internal operations and the value chain, especially in terms of the supply of electricity and the development of technological solutions for customers that make it possible to reduce emissions.

Although the TIM Group does not have a formal climate transition plan, the actions taken are consistent with strategies to reduce energy consumption and CO<sub>2</sub> emissions.

### 1. Use of energy from renewable sources

The actions described below in relation to 2024 aim to increase the use of renewable energy sources in order to reduce and mitigate the following impact of the company identified by the double materiality analysis: *"The use of fossil energy sources helps to increase emissions with consequences on climate change"*.

#### Domestic BU

- **Acquisition of guarantees of origin (GO)** with attention paid to the use of Power Purchase Agreements (PPA). At the end of 2024, 84% of the total energy supply comes from renewable sources. The goal is to reach 100% by 2025. The financial resources committed to the budget in 2024 for the purchase of GO amounted to: OpEx approx. €911.00k;
- **Self-generation of electricity from photovoltaic systems**
  - the plant at the West Milan data center produced more than 520 MWh;
  - the photovoltaic system at the West Turin data center has been completed and will begin producing renewable energy as from 2025.

#### TIM S.A.

- **Use of totally renewable energy** since 2021;
- **Supply of the TIM grid with electricity generated from renewable sources.** By the end of 2024, more than 60% of the energy used by the Company will come from the Company's own renewable power generation projects. The energy is produced by small power plants in order to optimize operational management and reduce greenhouse gas emissions. TIM S.A. has 129 active plants producing renewable energy, of which 113 are solar photovoltaic, followed by 14 hydroelectric and 2 with bioenergy;
- **Installation of 134 solar-powered antennas** in remote and hard-to-reach areas, ensuring connectivity in vulnerable regions and strengthening adaptation to the climate scenario.

Carrying out this activity involved the use of the following financial resources: OpEx €18,663.65k referred to taxonomic activity 4.1 "Power generation by solar and photovoltaic technology"; OpEx €5,415.20k referred to taxonomic activity 4.5 "Power generation from hydropower"; OpEx €4,027.78k referred to taxonomic activity 4.8 "Power generation from bioenergy".

These actions reflect the company's strategy to diversify its energy sources and reduce dependence on the conventional grid, promoting greater energy resilience and mitigating risks associated with climate change.

## 2. Reduction of energy and fuel consumption

The actions described below aim to improve energy efficiency thanks to the use of technologies that allow better performance in order to reduce and mitigate the significant negative impacts identified by the double materiality analysis:

- *"The construction and use of infrastructures (e.g. data centers) requires a high consumption of energy that can increase emissions with consequences on climate change";*
- *"The investments in infrastructures and the purchase of energy necessary for 5G, fiber optics and the cloud can affect climate change";*
- *"The greater computing and data processing power required by the use of AI and digital technologies in business processes can increase energy consumption and the carbon footprint of the company or supply chain, affecting climate change."*

### Domestic BU

#### Data Center

In Italy, the TIM Group has **16 data centers in 8 cities** that guarantee the highest levels of operation, security and energy efficiency, divided as follows:

- **7 x Core data centers** offering maximum-performance cloud and co-location services;
- **6 x public cloud data centers** where the platforms of the most important public cloud providers operate;
- **3 Service Centers** i.e., secure and reliable micro-data centers near customer locations.

Below are the efficiency actions carried out in 2024.

- **Extraordinary or evolutionary maintenance** consisting of:
  - repair of industrial components and auxiliary services such as:
    - relamping, free cooling in the North Rome and South Rome DCs;
    - Replacement of sensors, replacement of air conditioners in the South Rome DC.
  - Technological refresh due to obsolescence with the installation of:
    - 4 refrigerator units distributed in the West Rome, South Milan and South Rome data centers;
    - air conditioners in the Padua data center;
    - Uninterruptible power supplies (UPS) in the Bologna and South Milan data centers and batteries in the South Milan data center.

The above maintenance work involved the use of: CapEx €176.43k, referring to the taxonomic activity 7.3 "Installation, maintenance and repair of energy efficiency devices."

- **Installation, maintenance and repair of tools and devices for measuring**, regulating and controlling the energy performance of buildings. Specifically, the installation involved:
  - sensors monitoring the remaining autonomy of uninterruptible power supplies (UPS) at the East Milan site;
  - temperature and humidity detection probes at the South Rome site;
  - sensors for monitoring temperature in building management systems (BMS) and cooling units (CU) at the West Milan site;
  - energy meters at the West Rome site for activities related to the National Strategic Hub.

These actions involved the use of: CapEx €360.66k, attributable to taxonomic Activity 7.5 "Installation, maintenance and repair of tools and devices for measuring, regulating and controlling the energy performance of buildings".

There are also **7 high-efficiency cogeneration (CAR) plants** for heat/cooling and power generation at five locations in 2024: West Rome, South Rome, Bologna, Padua, South Milan.

Carrying out this activity involved the use of the following financial resources: OpEx €705.60k, attributable to taxonomic activity 4.30 "High-efficiency cogeneration of heat/cool and electricity from gaseous fossil fuels".

In 2024, all efficiency actions led to an energy saving of 0.59 GWh/year, an average **PUE<sup>9</sup>** (Power Usage Efficiency) of **1.52** out of the total number of Core data centers (an improvement compared to 2023 equal to 1.56) and an average 1% deviation from the project PUE of Public Cloud data centers<sup>10</sup>.

<sup>9</sup> It is the ratio of the total energy consumed by the data center to the energy used specifically by IT equipment. The closer the value of PUE is to 1, the more energy efficient the data center is

<sup>10</sup> The PUE varies depending on the power engaged by the equipment and the external climatic conditions. Public Cloud data centers are designed with a project PUE of <1.3 at full load. Therefore, with a minimum threshold of 1, the more the data center is filled with IT equipment, the closer it will approach a value near 1.3. In this case, with a Public Cloud data center fill rate between 20% and 30%, the deviation from the project PUE is 1%.

## TIM Stores

The TIM network has 653 stores dedicated exclusively to the marketing of TIM fixed-line and mobile offers, including 206 directly owned TIM Retail, 300 franchised and 147 single brand. Below are the actions carried out at the stores in 2024.

### ■ Energy efficiency of TIM Retail stores:

- relamping: replacement of halide light fixtures with LED panels with an estimated energy saving of about 3,010 kWh/year per store. The actions affected 10 stores, adding to the previous 29 in 2023;
- building automation: installation of devices for remote monitoring and control of lights, air conditioning, storefronts, signs, and monitors, with alarms for out-of-threshold parameters and remote controls (work done on 5 stores);
- energy monitoring: sample monitoring of energy consumption to identify improvement actions (interventions carried out on 6 stores).

The actions are part of an energy efficiency project that involved a total of 50 stores (39 for the relamping project, 5 for automation building project, 6 for consumption monitoring project) and that in 2024, generated a 15% energy saving compared to 2023, or 152,330 kWh/year.

### ■ New TIM store layout (Blue Vision Project).

The project involves the entire sales network and aims to reconcile the brand positioning with environmental sustainability, acting on various aspects:

- lighting with energy savings of up to 15%, additional at night;
- replacement of air conditioning systems using environmentally-friendly refrigerant gases, improving efficiency by up to 15%;
- installation of LED monitors with up to 20% reduction in power consumption;
- furniture designed with FSC- and EPD-certified materials;
- digital product labels through E-ink screens updated in real time to reduce paper use.

In 2024, the action was carried out on 8 stores. The goal is to reach 200 stores by 2026.

The financial resources used in 2024 for the new layout of TIM Stores (Blue Vision) amounted to: CapEx €3,827k (for the construction and opening of 8 stores in 2024 and for the design of 35 stores scheduled for 2025); OpEx €9k (a fee that TIM pays to business owners for the lease of the premises. The Partner will finance the expenses for the new layout).

## TIM S.A.

TIM S.A. reinforces its commitment to contain energy consumption thanks to the use of technologies that allow better performance with the same energy resources, with the aim of improving eco-efficiency in data traffic, or the relationship between the data service offered to the customer (bit) and energy consumption (Joules of energy consumed).

In 2024, eco-efficiency was 24,325 bits/joules (-5% from the 2023 figure of 32,883 bits/joules), notwithstanding the result already achieved compared to the 2019 baseline (+148%).

The following are the main efficiency measures:

### Network infrastructures

- Optimization of operational processes (RAN Sharing Project): The project involves a partnership between TIM and Vivo for the sharing of infrastructures, allowing the closure of redundant sites, with a significant reduction in operating costs and emission impact.

### Data Centers

- The buildings in which the data centers are located are equipped with an Atmospheric Discharge Protection System (SPDA). The rooms are equipped with fire and alarm systems (SDAEI) and certified according to ABNT NBR 15247, which ensures the highest level of physical security for the rooms, considering fire resistance, protection from heat, humidity, water, improper access and break-ins, and also redundant electrical and air conditioning facilities.
- The energy efficiency expressed by the average PUE (Power Usage Effectiveness) in 2024 is 1.64, below the set target value of 1.66. In 2023, the PUE was 1.46 (the increase from the previous year is mainly due to ongoing migration projects and the need to adjust room air conditioning)

## 3. Low-emission transport

The following interventions are aimed at reducing operating costs, optimizing fuel consumption, and introducing environmentally friendly ways of commuting.

### Domestic BU

The company fleet in Italy has a total of 2,357 vehicles, including 224 operational cars, 2,039 mixed-use cars and 94 car-sharing cars, while there are 12 electric columns located in 4 company sites.

Within TIM S.p.A. in 2024, the following actions were carried out:

- **electrification of the car sharing fleet:** out of a total of 94 vehicles, 17% are hybrid and full electric models. The financial resources used in 2024 for electric cars amounted to: OpEx €56.849k;
- **electrification of the mixed-use car fleet:** out of a total of 1791 vehicles, 44% are hybrid and full electric models. The financial resources used in 2024 amounted to: OpEx €4,789.96k;
- **carpooling service** via dedicated app (JO-JOB). In 2024, the service was used by 5% of the employees of the 6 sites involved, populated by a total of 5,900 people. The financial resources used in 2024 amounted to: OpEx €20.5k;
- **shuttle service.** In 2024, the service was used by 25% of the employees of the 12 sites involved, populated by a total of 7,600 people. The financial resources used in 2024 amounted to: OpEx €1,465.29k.

#### 4. Decarbonization of the supply chain

Supply chain management is essential to reduce greenhouse gas emissions associated with the purchase of goods and services. With this in mind, TIM in **Domestic**, has identified a number of activities on an ongoing basis.

- **ESG assessment during enrolment in the Register** for suppliers at risk in terms of geographical origin (Asia, Central and South America, North Africa, Eastern Europe) and potential violations on the environment, human rights and labor. The assessment is carried out based on the drafting of an ESG questionnaire that requires the achievement of a minimum compliance threshold of 40% for access to the register. All qualified suppliers are also required to sign TIM's Code of Ethics and Conduct. In 2024, 217 suppliers were qualified, of which 18% were subject to ESG assessment.
- **Sustainable procurement:** The sustainability envelope with up to 10% weight is used in tenders, which involves applying a check list of 30 parameters (eco standard guideline) to the purchase of products and services. In 2024, more than 12,200 purchases were made for a value exceeding €4 billion. The sustainability envelopes applied came to about 80;
- **Checks on execution of ESG contracts:** checks are made on the compliance of the specifications included in the contracts with effects on the Vendor Rating index. If negative, orders are rescheduled, or suppliers cannot take part in tender processes.
- **ESG performance assessment** of suppliers on Open-es platform. TIM accompanies suppliers toward continuous improvement on ESG issues through screening and assessment activities. Since 2022, TIM has been a value-chain partner of the Open-ES alliance, which provides ESG performance analysis tools based on international standards. At the end of 2024, there were 1,282 TIM suppliers profiled on the platform, with support through workshops, seminars and a community for sharing best practices. The financial resources used in 2024 amounted to: OpEx €147k.
- **ESG auditing through the JAC alliance:** TIM verifies, evaluates and promotes Corporate Social Responsibility (CSR) principles and best practices through membership in the JAC, a joint initiative among telecom operators for a sustainable supply chain, which includes audits to shared suppliers, among other initiatives. Through such audits, certifying bodies ensure the application of CSR principles in the supply chain, including principles aimed at climate change protection. In 2024, TIM conducted 11 onsite audits, with an investment of €52k. Future OpEx are estimated at €60k for 5 audits in 2025 and 3 remaining audits in 2024.

#### 5. Additional climate change mitigation initiatives

##### Domestic BU

##### ■ Nature-based solutions

- **Tree planting:** in 2024, an urban greening project was carried out at the Stura Sud Park in Turin where 400 new trees and shrubs were planted with the innovative Tiny Forest or Miyawaki Forest technique<sup>11</sup>. This approach involves planting native trees and shrubs, arranged with high density to promote rapid growth and contribute to the regeneration of the local ecosystem. The new plants planted will be able to absorb, over their entire life cycle (30 years), about 160 tCO<sub>2</sub>, or the equivalent of the emissions of about 1,780,000 PET plastic bottles<sup>12</sup>;
- **Offsetting the emissions of websites:** in order to offset the emissions generated by consulting its websites, TIM has decided to support an environmental project geared toward carbon reduction for the third consecutive year. In 2024, visits to the Group's 21 main commercial and institutional websites in Domestic generated more than 551,700 kg of CO<sub>2</sub>eq. To offset these emissions, TIM purchased 552 carbon credits through The Envira Amazonia Project, a forest conservation initiative in Brazil, certified by the Verra Standard (VCS), among the leading international quality standards for carbon credits. The project aims to preserve existing forests by preventing deforestation and thereby preventing the release of greenhouse gases (GHGs), particularly carbon dioxide (CO<sub>2</sub>), resulting from logging actions. The Envira Amazonia Project is considered a "Nature-based Solution" project, as it is aimed at conserving natural ecosystems to mitigate climate change while generating environmental, social and economic benefits for local communities.

<sup>11</sup> The planting initiative is part of Rete Clima's "Foresta Italia" national afforestation campaign, an organization that accompanies companies on sustainability and decarbonization paths, as part of the Foresta Italia® National Campaign, in partnership with Coldiretti and PEFC Italia.

<sup>12</sup> The calculation was carried out thanks to the CO<sub>2</sub>Web® methodology developed by Rete Clima, a non-profit organization specialized in promoting sustainability in organizations, and verified by the ICMQ Certification Body

**[MDR-A, 69 a]:** To field the plan of actions related to the mitigation of impacts and risks in environmental issues, the enterprise appropriately plans the necessary financial resources.

In addition, the Group has developed a sustainable financing plan, including through the issuance of Sustainability Bonds, which enables it to raise resources for ESG (environmental, social, and governance) initiatives, and ensures access to the capital market with favorable terms, particularly for research-intensive projects and technological innovation.

In Italy, the Group issued a Sustainability Bond in 2021 with a term of 8 years, which to date has a remaining notional amount of €499 million. The net proceeds of this bond were fully allocated after the first year, as reported in the Sustainability Bond Report 2021, to eligible categories as provided in the Sustainability Financing Framework 2020.

In Brazil, TIM S.A. made a similar commitment, issuing R\$1.6 billion in Sustainability-Linked Bonds (SLBs) in 2021, bonds linked to social and sustainability goals.

In addition, TIM continues to collaborate with investors and partners to promote long-term sustainability, ensuring that ecological and digital transition objectives are supported by adequate capital flows. The Group's financial strategy also integrates the management of risks related to fluctuations in capital costs, with the aim of optimizing resources and maximizing the social and environmental impact of its actions.

**[29 b]:** Mitigation actions implemented by the Group contribute to the reduction of Scope 1 and Scope 2 emissions as defined in the Business Plan targets.

TIM's ability to implement strategic actions depends significantly on the availability and allocation of resources, including financial resources. Continuous access to affordable finance is crucial to support initiatives to adapt to market developments, such as managing changes in demand and supply, and to support strategic investments, such as acquisitions and research and development (R&D) activities.

To this end, TIM has a strong financial structure that enables it to access diversified sources of capital on competitive terms and using ESG criteria, facilitating the implementation of long-term projects.

Indeed, in the Company's current €4 billion revolving syndicated credit facility (RCF), there is a margin adjustment mechanism based on TIM's achievement of certain previously identified ESG KPIs.

## Metrics and targets

### Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation

[32], [MDR-T, 80 a, b, c, d, e]: The TIM Group, in its new 2025-27 Plan, has identified the following targets aligned with the content and principles expressed within its policies:

1. **100% Renewable Energy by 2025;**
2. **Carbon Neutrality (Scopes 1+2) by 2030;**
3. **New Transition Plan (Scope 3) by 2030;**
4. **Net Zero (Scopes 1+2+3) by 2040.**

Through these long-term targets, the progress of which is monitored periodically, the Group aims to significantly reduce the environmental impact of its own operations and those of the value chain.

Targets 1), 2), and 4) are expressed as absolute reduction targets, as the goal is to achieve zero emissions, regardless of initial levels, although forms of offsets are included to achieve neutrality. Target 3), on the other hand, is expressed in relative values, as the transition plan will be defined from 2024, the base year following the new organizational structure. In all cases, progress in emission performance against targets will be represented in relative terms as YoY progress relative to the base year. The introduction of intermediate targets appropriate to the new arrangement will be evaluated after the new transition plan is redefined.

The targets cover the entire TIM Group (see disclosure requirement BP-1 "General Criteria for Drafting Sustainability Statements" for details on the reporting perimeter) and include its own and value chain activities, upstream and downstream.

[32], [MDR-T, 80 f]: The objectives set by the TIM Group are aligned with national, EU and international political scenarios, and generally take into account the impacts and analyses carried out on the company's environmental data. In addition, the targets set are aligned with the following Sustainable Development Goals (SDGs):

- **SDG 7:** ensure access to clean, cheap, and sustainable energy for all;
- **SDG 9:** promote sustainable investments in the infrastructures necessary for the dissemination of communication technologies;
- **SDG 11:** disseminate the smart city model to make cities inclusive, safe, resilient, and sustainable;
- **SDG 12:** promote efficiency in the use of resources and energy;
- **SDG 13:** act quickly to combat climate change and its impacts.

[32], [MDR-T, 80 g]: The Group attaches considerable importance to the validation of its emission reduction commitments by the Science Based Targets initiative (SBTi). Therefore, starting in 2022, the climate strategy was validated by the Science Based Targets initiative (SBTi), which confirmed its consistency with the objective of keeping global warming under 1.5°C, as established by the Paris Agreement on climate change.

However, as a result of the major change in the scope of the company occurred from July 1, 2024 as provided by SBTi itself, it will be necessary to resubmit these objectives.

[32], [MDR-T, 80 h]: Stakeholder engagement is crucial in defining sustainability goals, as demonstrated by the double materiality analysis, which, starting with the identification of impacts, risks and opportunities for the Company, contributes to the definition of the Group's priorities (for more details, see Disclosure Requirement SBM-2 "Stakeholder Interests and Views").

[32], [MDR-T, 80 i], [MDR-T, 80 j]: To monitor the effectiveness of the Group's actions put in place and to track progress against CO<sub>2</sub> emission reduction targets, TIM has activated monitoring processes and KPIs and since 2023 and has implemented an ESG platform that enables monitoring of performance against target goals. The redefinition of the organizational perimeter and a new base year to evaluate business performance following the spin-off operation does not make it possible to compare the data set out in the sustainability statements prior to 2024. As a result, progress on targets will be displayed from the next reporting year.

[33]: All environmental targets defined in the Plan cover the relevant climate-related impacts, risks, and opportunities revealed in the dual significance analysis (see ESRS 2 SBM-2 disclosure requirement "Stakeholder Interests and Views").

[34 a, b]: The significant change in the company's structure and activities requires a redefinition of the base year against which the TIM Group will measure its improved emissions performance. Reduction targets are expressed either in a combined way, such as in the case of Carbon Neutrality, or separately in the case of 100% renewable energy, which focuses on Scope 2 (for details see the data point [49 a, b]).

For Scope 2, the TIM Group uses the Market Based method. The scope of the GHG emission reduction target does not differ from the scope of GHG emissions reported under the E1-6 reporting requirement "Gross scope 1, 2, 3 GHG emissions and total GHG emissions." For Scope 3, the total GHG emissions covered by the target are related to categories 3.1 (purchased good and services), 3.2 (capital goods) and 3.11 (use of sold products), as defined within the GHG Protocol.

[34 e], [16 a]: The primary environmental targets for the TIM Group, i.e., Carbon Neutrality by 2030 and Net zero by 2040, follow a sectoral decarbonization approach and refer to climate scenarios provided by



institutions such as the IPCC (Intergovernmental Panel on Climate Change) of the IEA (International Energy Agency).

The climate strategy was validated by the Science Based Targets initiative (SBTi) in 2022 consistent with the goal of keeping global warming within 1.5°C, but the significant change in the Group's organizational scope will require a new submission of targets. In defining the objectives, future developments were also considered, including the evolution of European climate regulations, the growth in demand for low-emission digital solutions and the adoption of emerging technologies for energy efficiency, but following the spin-off of the fixed network, the TIM Group will have to adjust the intermediate objectives and set a new base year.

[34 f], [16 b]: To identify developments or make assessments of environmental strategy and its own decarbonization levers, TIM adopts, qualitative and quantitative scenario analyses with Group-wide coverage. In particular, the analyses considered two scenarios aligned with maintaining the global temperature below 1.5° C, among those proposed by NGFS (Network for Greening the Financial System):

- NGFS Transition Scenario - 1.5°C: quantitative analysis with respect to the Net Zero target by 2040 focused on:
  - potential regulatory obligations aimed at offsetting non-reducible CO<sub>2</sub> emissions, such as, for example, the introduction of the carbon tax;
  - increased costs associated with the introduction of the carbon tax. In a time frame up to 2040, a linear estimate of the gradual reduction of CO<sub>2</sub> emissions was made with time intervals of ten years. The possible failure to meet the target with hypothetical deviations of 10%, 20%, 30% and the related potential economic impact was also estimated.
- Physical climate scenario based on the RCP 1.9 (1.5°C) and RCP 4.5 (2.1°C – 3°C) scenarios, the Group has chosen a scenario analysis that can be effectively applied to the company's climate strategy in the coming years. Analysis of climate change risks is included in the Group's Risk Management (ERM) framework. In particular, climate-related risks that may affect the Company's assets (such as river flooding and flooding) and, more generally, the Group's business continuity were assessed. The analysis focused on hydrogeological risk and risk on work performance. With respect to the hydrogeological risk (Net Zero scenario by 2050), with the help of the TIMgis system, the hydrogeological risk maps created by ISPRA (the public body subject to the supervision of the Ministry of Ecological Transition) have been linked to the TIM georeferenced databases of buildings and the network valued at the cost of reconstruction/replacement.

For more details with respect to climate change mitigation actions and decarbonization levers adopted by the Group in this area, please refer to disclosure requirement E1-3 "Actions and resources related to climate change policies". It is also specified that the emission quantifications of the levers will be outlined when the Group transition plan is formalized.

## Disclosure requirement E1-5 - Energy consumption and energy mix

[MDR-M, 77 a], [37 a, b]: All metrics related to the Group's energy consumption refer to the companies in the environmental perimeter (for details see Disclosure Requirement BP-1 "General Criteria for Preparing the Sustainability Statement"). Due to the organizational discontinuity that occurred on July 1, 2024, no comparative information from previous years is reported.

TIM subjects its energy management processes to internationally recognized certifications, such as ISO 50001, which specifies requirements for an effective energy management system.

TIM uses standard methodologies to measure energy consumption and its mix. The total consumption, expressed in megawatt hours (MWh), is divided into energy from fossil, renewable and nuclear sources.

Energy from fossil sources includes fuels such as coal, oil and natural gas, as well as purchased energy from fossil sources.

Renewable energy includes renewable fuels (biomass, biogas, renewable hydrogen), purchased renewable energy (electricity, heat, steam) and self-generated renewable energy.

Nuclear power, i.e., the share of electricity generated by nuclear power plants, was calculated based on the Residual Mix, using the figure published by AIB 2023 (Association of Issuing Bodies) to ensure consistency with the emission factors adopted in the emission calculations. For the reporting year, the share of nuclear power in the Italian Residual Mix of 4.40% was applied to total electricity consumption from mixed sources.

Self-produced and internally consumed energy is counted only once in the relevant category.

As a Telecommunications company, TIM is not among the companies subject to the disclosure requirements for high climate impact industries. However, considering the Group companies individually, TIM Retail S.r.l. and Olivetti S.p.A. fall within sectors considered to have a high climate impact. For these companies, energy consumption is disaggregated by fossil source categories. In addition, energy intensity is calculated for these companies as the ratio of total energy consumption to net revenues to assess energy efficiency in relation to financial performance, excluding materials and fuels used as raw materials not intended for energy purposes.

TIM's consumption refers to the entire Fiscal Year 2024. Consumption data for the second half of the year for the assets in use by TIM (colocation and offices) and transferred to NetCo, were estimated linearly from the first half of the year, due to unavailability of primary data.

For consumption reported for NetCo alone in the first half of the year, see the section "Information on NetCo's Performance," Disclosure Requirement E1-5 "Energy Consumption and Energy Mix."

The consumption and energy mix at the Group level are shown below.

**[37]: Energy consumption and mix - TIM Group**

	UOM	2024
<b>Total energy consumption from fossil sources</b>	<b>MWh</b>	<b>349,240.98</b>
Percentage of fossil sources in total energy consumption	%	15.77
<b>Total energy consumption from nuclear sources</b>	<b>MWh</b>	<b>8,626.89</b>
Percentage of energy consumption from nuclear sources in total energy consumption	%	0.39
<b>Fuel consumption from renewable sources</b>	<b>MWh</b>	<b>134,243.97</b>
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	1,351,332.71
Consumption of self-generated renewable energy without relying on fuels	MWh	370,561.87
<b>Total energy consumption from renewable sources</b>	<b>MWh</b>	<b>1,856,138.55</b>
Percentage of renewable sources of total energy consumption	%	83.84
<b>Total energy consumption related to own operations</b>	<b>MWh</b>	<b>2,214,006.42</b>

[38], [42]: For the companies TIM Retail S.r.l., Olivetti S.p.A. that are part of the high climate impact sectors, the representation of energy consumption and mix is provided below with details of the breakdown of energy consumption from fossil sources.

**[38]: Energy consumption and mix of High Climate Impact Companies (TIM Retail S.r.l. and Olivetti S.p.A.)**

	UOM	2024
Fuel consumption from coal and coal products	MWh	0.00
Fuel consumption from crude oil and petroleum products	MWh	591.63
Fuel consumption from natural gas	MWh	160.61
Fuel consumption from other fossil sources	MWh	0.00
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	MWh	0.00
<b>Total energy consumption from fossil sources</b>	<b>MWh</b>	<b>752.24</b>
Percentage of fossil sources in total energy consumption	%	17.58
<b>Total energy consumption from nuclear sources</b>	<b>MWh</b>	<b>0.00</b>
Percentage of energy consumption from nuclear sources in total energy consumption	%	0.00
Fuel consumption from renewable sources	MWh	0.00
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	3,525.69
Consumption of self-generated renewable energy without relying on fuels	MWh	0.00
<b>Total energy consumption from renewable sources</b>	<b>MWh</b>	<b>3,525.69</b>
Percentage of renewable sources of total energy consumption	%	82.42
<b>Total energy consumption related to own operations</b>	<b>MWh</b>	<b>4,277.93</b>

[39]: The following are Group data on energy production from nonrenewable sources and energy production from renewable sources.

**[39]: Non-renewable and renewable energy production - TIM Group**

	UOM	2024
Non-renewable energy production	MWh	100,081.42
Renewable energy production	MWh	370,561.88

[40], [41]: Below are energy intensity figures for TIM Retail S.r.l. and Olivetti S.p.A. operating in high climate-impact sectors, calculated on revenues before elisions.



**[40], [41]: Energy intensity of activities in high-impact climate sectors (TIM Retail, Olivetti)**

	UOM	2024
Total energy consumption from activities in sectors with a high climate impact	MWh	4,277.93
Net revenues from activities in high climate impact sectors used to calculate energy intensity	€ million	229.27
<b>Energy intensity associated with activities in sectors with high climate impact</b>	<b>MWh/€ million</b>	<b>18.66</b>

Below is a quantitative reconciliation of net revenues from activities in high climate impact sectors.

**[43]: Net revenues from activities in high climate impact sectors used to calculate energy intensity**

	€ million
Net Revenues from Activities in Sectors with High Climate Impact Used to Calculate Energy Intensity	229
Net Revenues (Other, Activities in Sectors Not with High Climate Impact)	14,213
<b>Total Net Revenues as per Consolidated Balance</b>	<b>14,442</b>

**Disclosure requirement E1-6 - Gross Scope 1, 2, and 3 GHG emissions, as well as total GHG emissions**

**[MDR-M, 77 a], [44], [47]]:** Gross GHG emissions refer to the Group's environmental perimeter (see Disclosure Requirement BP-1 "General Criteria for Preparing the Sustainability Statement") and are expressed in metric tons of CO<sub>2</sub>eq.

In line with current regulations, the **methodology** adopted for carbon inventory calculation refers to the **Greenhouse Gas Protocol**. Specifically, the guidance contained in the "Corporate Accounting and Reporting Standard" for general reporting and the "Corporate Value Chain Accounting and Reporting Standard" for Scope 3 emissions are followed.

Due to the organizational discontinuity that occurred on July 1, 2024 which resulted in significant changes in the circumstances affecting GHG emissions, it is not possible to provide comparative information with respect to previous years

TIM's emissions refers to the entire Fiscal Year 2024. The emissions reported to NetCo alone in the first half of the year are in the section "Information on NetCo's Performance," disclosure requirement E1-6 "Gross Scope 1, 2, 3 GHG Emissions and Total GHG Emissions."

**[44], [52 a, b]: Gross Scope 1, 2, 3 GHG Emissions - TIM Group**

	UOM	2024
Gross Scope 1 GHG emissions	tCO <sub>2</sub> eq	52,402.12
Gross Scope 2 Location-Based GHG emissions	tCO <sub>2</sub> eq	350,081.45
Gross Scope 2 Market-Based GHG emissions	tCO <sub>2</sub> eq	103,374.75
Gross Scope 3 GHG emissions	tCO <sub>2</sub> eq	2,025,399.85
<b>Total Location Based GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>2,427,883.42</b>
<b>Total Market Based GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>2,181,176.72</b>

**[MDR-M, 77 a], [44], [50 a, b]:** The following are the Scope 1 and Scope 2 emissions of the TIM Group with reference to the environmental scope for activities where the Company has financial and operational control.

TIM exercises financial control over owned buildings and infrastructure. Instead, it exercises operational control over the real estate and infrastructure it uses, which it does not own, over which it has energy utilities in its name, where it has the ability to purchase energy (including renewable energy) directly or indirectly, and where it has the ability to influence investments related to the property or the definition of the activities carried out therein.

**[44], [50 a, b]: Gross GHG emissions disaggregated by control type - Scope 1 and 2 - TIM Group**

	UOM	2024
<b>Gross Scope 1 GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>52,402.12</b>
From activities with financial control	tCO <sub>2</sub> eq	45,121.91
From activities with operational control	tCO <sub>2</sub> eq	7,280.21
<b>Gross Scope 2 Location-Based GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>350,081.45</b>
From activities with financial control	tCO <sub>2</sub> eq	112,462.22
From activities with operational control	tCO <sub>2</sub> eq	237,619.23
<b>Gross Scope 2 Market-Based GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>103,374.75</b>
From activities with financial control	tCO <sub>2</sub> eq	5,230.99
From activities with operational control	tCO <sub>2</sub> eq	98,143.76
<b>Total GHG Scope 1 and 2 emissions based on Location-Based financial control</b>	<b>tCO<sub>2</sub>eq</b>	<b>157,584.13</b>
<b>Total GHG Scope 1 and 2 emissions based on Market-Based financial control</b>	<b>tCO<sub>2</sub>eq</b>	<b>50,352.90</b>
<b>Total Scope 1 and 2 GHG emissions based on Location-Based operational control</b>	<b>tCO<sub>2</sub>eq</b>	<b>244,899.44</b>
<b>Total GHG Scope 1 and 2 emissions based on Market-Based operational control</b>	<b>tCO<sub>2</sub>eq</b>	<b>105,423.97</b>

Below are the TIM Group's gross GHG emissions disaggregated by Scope 1, 2 and 3 with reference to the Domestic BU and Brazil BU (TIM S.A.).

**[RA 41] Gross Scope 1, 2 and 3 GHG emissions by Business Unit**

	UOM	Gross Scope 1 GHG emissions	Gross Scope 2 Location-Based GHG emissions	Gross Scope 2 Market-Based GHG emissions	Gross Scope 3 GHG emissions	Total Location Based GHG emissions	Total Market Based GHG emissions
Domestic BU	tCO <sub>2</sub> eq	33,750.35	333,801.94	103,374.75	1,439,960.93	1,807,513.22	1,577,086.03
Brazil BU	tCO <sub>2</sub> eq	18,651.77	16,279.51	—	585,438.92	620,370.20	604,090.69
<b>Group Total</b>	<b>tCO<sub>2</sub>eq</b>	<b>52,402.12</b>	<b>350,081.45</b>	<b>103,374.75</b>	<b>2,025,399.85</b>	<b>2,427,883.42</b>	<b>2,181,176.72</b>

**[MDR-M, 77 a], [48a]:** The **Group's gross Scope 1 GHG emissions** are reported in metric tons of CO<sub>2</sub>eq and are generated almost exclusively from fossil fuels for heating, automotive, and power generation.

Also included in the calculation and converted to CO<sub>2</sub> are leaks of hydrochlorofluorocarbon (HCFC) gases, hydrofluorocarbon (HFC) gases, and other gases when present in air-conditioning and fire-fighting systems.

Valuation of CO<sub>2</sub> equivalent emissions of HCFC, HFC and other refrigerant gases is done by considering global warming potentials (GWP): the index is based on a relative scale that compares the gas considered with an equal mass of carbon dioxide whose GWP is 1 and the calculation used the IPCC's Sixth Assessment Report (VI Report).

The **emission factors** used, expressed in CO<sub>2</sub>eq are published by **DEFRA 2024** (Department For Environment, Food and Rural Affairs).

For TIM S.A., emissions from effluents, from the consumption of fuels used for the maintenance of electricity generation plants and from fugitive CO<sub>2</sub> emissions deriving from the recharging of fire extinguishers, have been reported in detail. In addition, biogenic emissions are reported separately.

The calculation of the Scope 1 GHG emissions excludes absorptions, and any shares of GHG or carbon credits purchased, sold or transferred. Furthermore, the TIM Group is not included in the scope of activities for the EU Emissions Trading System (EU ETS).

Scope 1 GHG emissions are calculated by distinguishing the origin from stationary combustion, mobile combustion, process emissions and fugitive emissions using suitable data on activities that include consumption of nonrenewable fuels.

**[48a] Type of GHG emissions included in Scope 1 - TIM Group**

	UOM	2024
<b>Emissions by stationary combustion:</b>	<b>tCO<sub>2</sub>eq</b>	<b>22,691.04</b>
emissions from trigeneration	tCO <sub>2</sub> eq	16,821.22
heating emissions	tCO <sub>2</sub> eq	3,734.21
emissions from the self-generation of electricity from mixed sources <sup>13</sup>	tCO <sub>2</sub> eq	2,135.61
biogas emissions	tCO <sub>2</sub> eq	0.00
<b>Mobile combustion emissions:</b>	<b>tCO<sub>2</sub>eq</b>	<b>9,827.48</b>
emissions from haulage	tCO <sub>2</sub> eq	7,911.47
emissions from machinery used for the maintenance and cleaning of plants	tCO <sub>2</sub> eq	1,916.01
<b>Process emissions:</b>	<b>tCO<sub>2</sub>eq</b>	<b>0.00</b>
Emissions from tributaries	tCO <sub>2</sub> eq	0.00
<b>fugitive emissions:</b>	<b>tCO<sub>2</sub>eq</b>	<b>19,883.61</b>
emissions from the dispersion of ozone-depleting gases	tCO <sub>2</sub> eq	19,883.61
<b>Total Scope 1 emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>52,402.12</b>

**[RA 43c] Biogenic emissions not included in Scope 1 - TIM Group**

	UOM	2024
Biogenic emissions of CO <sub>2</sub> from the combustion or bio-degradation of biomass separately from the Scope 1 GHG emissions	tCO <sub>2</sub> eq	166.02

**[48 b]:** In the calculation of Scope 1 GHG emissions, the TIM Group does not use and therefore does not consider emissions covered by regulated quota trading systems.

**[MDR-M, 77 a], [49 a, b], [52 a, b], [RA 45 d]:** : **TIM Group's gross Scope 2 GHG emissions**, expressed in metric tonnes of CO<sub>2</sub>eq, are reported in a disaggregated manner, distinguishing between emissions measured by the Location Based method and those measured by the Market Based method.

For the **Location-Based methodology**, the Domestic BU uses the average emissions associated with the power grid of the country where the energy is consumed, applying **national emission** factors. The databases that have been used include **ISPRA 2023** (published on 22/05/24) for Italy, **Terna 2019** for Turkey and Panama. This approach reflects the indirect emissions deriving from purchased energy based on the composition of the local power grid. For TIM S.A., quantification of emissions is based on the average emission factor for electricity generation in a given power system, using the National Interconnected System (NIS), under the responsibility of Ministries of Science and Technology (MCTi). This mandatory approach is traditionally adopted by the PBGHGP (Brazilian Greenhouse Gas Emissions Management Program).

For the **Market-Based methodology**, specific energy supply contracts were considered, such as green energy purchase contracts or renewable energy certificates. The Domestic BU uses **AIB 2023** (published 4/06/24) **emission factors** for residual mix and location-based methodology for countries outside the European Union where residual mix could not be obtained. There are no biogenic CO<sub>2</sub> emissions from combustion or biodegradation of biomass for Scope 2 GHG emissions. For **TIM S.A.**, the emission factor specific to the electricity generation sources chosen by the Company for purchase is considered.

For the Domestic BU, "Market Based" emissions are covered by Guarantees of Origin for about 75% and Power Purchase Agreements, with ERG for the supply of energy from wind farms, for 9%, covering in total 84% of the total energy purchased. Instead, TIM S.A. uses Renewable Energy Certificates (I-RECs) covering 100% of the energy purchased.

**[49a, b]: Gross Scope 2 GHG Emissions - TIM Group**

	UOM	2024
Gross Scope 2 Location-Based GHG emissions	tCO <sub>2</sub> eq	350,081.45
Gross Scope 2 Market-Based GHG emissions	tCO <sub>2</sub> eq	103,374.75

**[MDR-M, 77 a], [51]:** The TIM Group's **gross Scope 3 GHG emissions** are in line with the principles of the Corporate Value Chain (Scope 3) Accounting and Reporting Standard of the Greenhouse Gas Protocol (2011 version, pp. 61 and 65-68) and include reporting on the following emission-relevant categories: 1. "Purchased goods and services"; 2. "Capital goods"; 11. "Use of products sold".

An effort was also made to expand the disclosure of its emissions to include the following additional categories: 3. "Fuel and energy-related activities"; 12. "End of life treatment of sold products".

<sup>13</sup> Emissions from self-generated electricity from mixed sources in the table include both emissions from diesel for generator sets and emissions from natural gas for the self-generation of energy

The reporting boundary includes companies in the environmental perimeter. Offsets and any GHG allowances or carbon credits purchased, sold or transferred are excluded from the calculation of Scope 3 emissions. The Scope 3 categories were measured using inputs from specific activities along the upstream and downstream value chain, but were not calculated based on raw data obtained from suppliers or other partners along the value chain.

Below are the **calculation methodologies** for the different Scope 3 categories:

■ **Category 1 - Purchase of products and services**

- **BU Domestic:** an **expenditure-based methodology** was adopted that uses the purchase items by commodity group (confirmed expenditure net of intercompany), of the companies included in the environmental perimeter surveyed by SAP<sup>14</sup>. Operating expenses for telecommunication services, including rental and management of space and infrastructure provided by third parties and colocation expenses, were also considered. For the conversion of the monetary value into emissions, the **NACE-Eurostat emission factors** were used. For the other companies in the environmental perimeter<sup>15</sup>, subject to reporting, the items in the Consolidated Financial Statements related to expenditures for "Purchase of goods and services" were used to which average emission factors taken from the sample of available data were applied.
- **TIM S.A.:** an **expenditure-based methodology** was adopted using commodity group purchase items (net of intercompany expenditure) and audited accounting items. For the conversion of the monetary value into emissions, the **NACE-Eurostat emission factors** were used.

■ **Category 2 - Purchase of capital goods:**

- **Domestic BU:** an **expenditure-based methodology** was adopted using the investment items by commodity group (well-extended amounts net intercompany) of companies in the environmental perimeter surveyed by SAP (see Note 14). This includes investment in the operation of its own telecommunications services provided by third parties. For conversion of monetary value to emissions, **emission factors** published by **Eurostat** were used. For the other companies in the perimeter (see Note 15) being reported, investment data were taken from the items in the Consolidated Financial Statements in relation to Investments (CapEx) to which average emission factors taken from the sample of available data were applied.
- **TIM S.A.:** an **expenditure-based methodology** was adopted, which took audited investment items (net of intercompany investment) as a reference. **Emission factors** related to the type of purchase published by **Eurostat** were used to convert the monetary value to emissions.

- **Category 3 - Fuels and energy-related activities (not included in Scope 1 or 2):** the calculation was made by multiplying the fuel consumption and electricity purchase data of Scope 1 and Scope 2 by their respective emission factors. These factors include the impact generated by the production of the energy carrier and the losses associated with transportation and distribution. For fuels, the **DEFRA 2024** database was used; For non renewable electricity, however, **DEFRA 2021** emission factors were used, as those for the 2024 database were no longer available.

- **Category 11 - Use of goods and services:** the calculation methodology considers the use phase of products sold by the Group. Given the wide variety of products marketed, the average weighted emission impact for the different product categories was initially assessed, then focusing on those with the greatest impact in terms of sales volume. The calculation has considered the **average energy consumption during the average useful life of the product**. The consumption is then multiplied by the corresponding location-based emission factor of electricity. For the **Domestic BU**, the **ISPRA 2023 emission factor** (published on May 22, 2024) was applied, while for **TIM S.A.**, the average emission factor for electricity generation in the **National Interconnected System (SIN)** under the responsibility of the Ministries of Science and Technology (MCTI) was used.

- **Category 12 - End-of-life treatment of products sold:** the methodology considers the disposal stage of products sold by the Group and adopts the **average data method**. Given the large quantity of products marketed, average weights were calculated for each product category, considering sector estimates based on the type of disposal expected for each good. For both the Domestic BU and TIM S.A., **emission factors** based on the **DEFRA 2024** database were used.

No biogenic emissions of CO<sub>2</sub> from the combustion or biodegradation of biomass that occur in its upstream and downstream value chain were registered.

The calculation of the Scope 3 GHG emissions excludes absorptions, and any shares of GHG or carbon credits purchased, sold or transferred.

**[51]: Gross Scope 3 GHG Emissions - TIM Group**

	UOM	2024
Category 1 Purchased goods and services	tCO <sub>2</sub> eq	1,507,169.99
Category 2 Capital goods	tCO <sub>2</sub> eq	303,900.22
Category 3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	tCO <sub>2</sub> eq	28,255.83
Category 11 Use of sold products	tCO <sub>2</sub> eq	186,054.21
Category 12 End of life treatment of sold products	tCO <sub>2</sub> eq	19.60
<b>Total Gross Scope 3 GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>2,025,399.85</b>

<sup>14</sup> TIM S.p.A., Telecontact Center S.p.A., Telecom Italia Sparkle S.p.A., TI Sparkle Turkey, Olivetti S.p.A and Noovle S.p.A..

<sup>15</sup> TI Sparkle Greece S.A., Telsy S.p.A., Panama Digital Gateway S.A. and TIM Retail S.r.l..

[MDR-M, 77 a], [53]: Below is the value of the TIM Group's GHG intensity (environmental perimeter) in metric tons of CO<sub>2</sub>eq determined by relating total GHG emissions by both Location Based and Market Based methods to net revenues.

#### [53] GHG Intensity - TIM Group

	UOM	2024
Total Location Based GHG emissions	tCO <sub>2</sub> eq	2,427,883.42
Total Market Based GHG emissions	tCO <sub>2</sub> eq	2,181,176.72
Net revenues used to calculate GHG intensity	€ million	14,207
<b>Intensity of Location Based GHG emissions</b>	<b>tCO<sub>2</sub>eq/million €</b>	<b>170.89</b>
<b>Intensity of Market Based GHG Emissions</b>	<b>tCO<sub>2</sub>eq/million €</b>	<b>153.52</b>

#### [55] Reconciliation with financial statements - TIM Group

	UOM	2024
Net revenues used to calculate GHG intensity	€ million	14,207
Net Revenues (other, not related to environmental perimeter)	€ million	235
<b>Total Net Revenues as per Consolidated Balance</b>	<b>€ million</b>	<b>14,442</b>

For key information related to NetCo, please refer to the section "NetCo Performance Information", Disclosure Requirement E1-6 "Gross Scope 1, 2, 3 GHG Emissions and Total GHG Emissions".

### Disclosure Requirement E1-7 - GHG removals and GHG mitigation projects financed through carbon credits

[MDR-M 77 a], [56 a, b], [58 a, b]: TIM provides transparency on GHG offsetting activities carried out outside its value chain through the purchase of certified carbon credits. Specifically, in order to offset the more than 551 tCO<sub>2</sub>eq generated in 2024 from consulting the main commercial and institutional websites of the Domestic BU, TIM purchased 552 carbon credits, through "The Envira Amazonia Project," a forest conservation initiative in Brazil, which aims to preserve existing forests by preventing deforestation as a result of logging actions and the consequent release of greenhouse gases (GHGs), particularly carbon dioxide (CO<sub>2</sub>). The calculation of avoided emissions and carbon credits to be purchased follows the CO<sub>2</sub>web® calculation methodology owned by Rete Clima, a nonprofit technical body specializing in promoting sustainability in organizations, and is verified by the ICMQ Certification Body.

In Brazil, TIM S.A. provides transparency on GHG offsetting activities carried out outside its value chain through the purchase of certified carbon credits. In 2024, 16,619 carbon credits were purchased for the neutralization of direct GHG emissions. The decision to invest in a certified project was driven by the need to also ensure support for local communities and stimulate positive social-environmental aspects.

[MDR-M, 77 a], [58 e, f], [60], [61 a, b, c]: The TIM Group has given public disclosure of its website neutralization activity through the use of carbon credits. However, this activity falls outside the broader targets set by the company (specifically "Carbon Neutrality" and "Net Zero") communicated in the Disclosure Requirement. "E1-4 Targets related to climate change mitigation and adaptation."

"The Envira Amazonia Project" is certified according to the following internationally recognized quality standards:

- Verified Carbon Standard (VCS) - Verra: the VCS standard ensures that the project generates real, verifiable, and permanent CO<sub>2</sub> reductions. It is one of the most internationally recognized standards for GHG emission reduction and absorption projects;
- CCB Standards (Climate, Community & Biodiversity Alliance): the project is also certified to the CCB standard, which attests to the environmental, social, and biodiversity benefits generated by the initiative.

The project ensures a measurable positive environmental impact through reduced emissions from avoided deforestation in support of sustainable economic development projects and uses a biogenic sink, as it relies on the conservation of natural forests that store CO<sub>2</sub> in plant biomass and soil. As the project is located in Brazil, no purchased carbon credits were generated within the European Union.

There are no reported activities, related to the absorption and storage of GHG from its own operations and its upstream and downstream value chain.

## Resource use and circular economy [ESRS E5]

### Impact, risk, and opportunity management

#### Disclosure Requirement E5-1 – Policies related to resource use and circular economy

[14], [MDR-P, 65 a]: IROs that emerged as significant from the dual relevance analysis to the theme "Resource Use and Circular Economy" are addressed in the Policy "**Commitment to Environmental Sustainability in the TIM Group**" and the "**Waste Management Procedure**." All policies link to the following significant negative impact revealed by the double materiality analysis:

- *"the incorrect management of waste by TIM (e.g. electronic waste) and its supply chain (e.g. network components) can contribute to environmental pollution and affect the transition to the circular economy".*

With respect to the considered IRO, the Policy "**Commitment to Environmental Sustainability in the TIM Group**" emphasizes TIM's commitment to:

- manage the waste generated through its business in order to favor the reuse and recycling of materials, reducing the use of dangerous substances to a minimum;
- invest in the development of low-carbon solutions, products and services, contributing to the energy transition towards a low-carbon economy;
- choose suppliers and partners based on environmental sustainability criteria.

The "**TIM Waste Management Procedure**" aims to identify general rules, roles and responsibilities for the correct management of waste produced by all business activities in line with mandatory legislative provisions, and with the provisions set out in Legislative Decree 231, considering that the possibilities of prevention, reuse and recycling of the waste produced have already been verified.

In addition, in order to strengthen its commitment to the circular economy, the Group has defined additional guiding principles on the management of resources and waste, which include, among other things:

- the implementation of action plans aimed at reducing the production of waste and increasing the useful life of goods through, for example, the supply of regenerated products for customer service and the sale of reconditioned products;
- the promotion of programs for the recycling of business equipment such as PCs and mobile phones as well as business furniture that is reused internally or donated for social purposes;
- the selection of suppliers who maximize the recovery of the waste sent for disposal and who favor the reuse of rare resources and precious materials;
- the preparation of training and awareness programs for employees in order to spread responsible behavior within the Organization.

To contextualize the Group's policies in the Brazilian business context, TIM S.A. has also defined the "**Environmental Policy**" in which the company sets out its commitment to:

- promoting the continuous improvement of its environmental performance;
- mitigating environmental risks associated with the company's business;
- compliance with the relevant regulations and the Group's guidelines.

With reference to the specific impact identified for the "circular economy" theme, the policy also aims to manage waste with a view to adopting best practices to reduce production and promote its separate collection, recovery and recycling and the intelligent distribution and reverse logistics of products for an ecologically correct final destination.

[14], [MDR-P, 65 b]: The "Commitment to Environmental Sustainability" Policy is valid at the Group level. In particular, the recipients of the document are all the Italian and foreign TIM Group companies, the TIM Foundation, Instituto TIM, the operating structures and corporate departments whose business may also have potentially significant impacts on the environment.

TIM's Waste Management Procedure is intended for all TIM's business functions and companies in Italy that, for different reasons, participate in the management of the waste deriving from their activities within the national territory.

[14], [MDR-P, 65 c]: The implementation of the "Commitment to Environmental Sustainability" Policy is entrusted to the head of the Corporate Communication and Sustainability Department who reports directly to the Chief Executive Officer.

TIM's Waste Management Procedure is approved by the Human Resources Department and by all the main business functions involved in waste management.

[14], [MDR-P, 65 d]: The "Commitment to Environmental Sustainability" Policy is in line with the main international reference standards such as ISO 14001, ISO 14064, ISO 50001 and the GHG Protocol.

For TIM's Waste Management Procedure, the list of the main regulatory references is provided below:

- Community Directive 2008/98/EC on waste and decision 2014/955/EU.
- Legislative Decree no. 152 of April 3, 2006 (and subsequent amendments) - Environmental regulations - Part IV.
- Ministerial Decree of December 17, 2009 - Establishment of the waste traceability control system, pursuant to Article 189 of Legislative Decree no. 152 of 2006 and Article 14-bis of Decree-Law no. 78 of 2009 converted, with amendments, by Law no. 102 of 2009 and subsequent amendments.



- Ministerial Decree no. 145 of April 1, 1998 - Regulation defining the model and the contents of the waste accompanying form pursuant to articles 15, 18, paragraph 2, letter e), and paragraph 4, of Legislative Decree no. 22 of February 5, 1997.
- Ministerial Decree no. 148 of April 1, 1998 - Regulation approving the model of the incoming and outgoing waste records pursuant to articles 12, 18, paragraph 2, letter m), and 18, paragraph 4, of Legislative Decree no. 22 of February 5, 1997.
- Commission Regulation (EU) no. 1357/2014 of December 18, 2014, which replaces Annex III of Directive 2008/98/EC of the European Parliament and of the Council on waste and which repeals certain directives, having entered into force on June 1, 2015.
- Offences provided for by the Criminal Code pursuant to Italian Law no. 68 of May 20, 2015 ("Provisions on crimes against the environment"): Articles 452 and subsequent amendments.

[14], [MDR-P, 65 e]: The Group Policies take into account aspects identified as fundamental and priority by analyses conducted internally and with external stakeholders. These aspects are strongly linked to the operations of the TIM Group Companies.

[14], [MDR-P, 65 f]: To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group's company website [www.gruppotim.it](http://www.gruppotim.it), in compliance with "least privilege" and "need to know" principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some, such as the Code of Ethics.

Information on TIM S.A.'s policies, on the other hand, can be found on its institutional website <https://ri.tim.com.br/> in the "Regulations and Policies" section

[15 a]: In the "Commitment to environmental sustainability in the TIM Group" Policy, the company emphasizes its focus on:

- the management of waste generated in the course of its business, which is carried out focusing on the reuse and recycling of objects, substances and materials to minimize the use of hazardous substances;
- the management of infrastructures and company offices, paying particular attention to technological systems, their design, operation and maintenance, to minimize the use of virgin resources such as paper, water, gas and fuels.

[15 b]: In the Policy "Commitment to environmental sustainability in the TIM Group", the Company recognizes the importance of ensuring that, in its business and in those of the supply chain, renewable resources are managed in such a way as to preserve the environment and to implement circular economy models. Specifically, TIM:

- when choosing suppliers, give priority to the adoption of recognized certification standards, such as the FSC for paper or the Environmental Product Declaration (EPD) and the carbon footprint for products, to ensure that the supply is managed in a sustainable way;
- promotes the recovery of raw materials, the regeneration of products, for example, for service management, as well as the sale of reconditioned devices.

## Disclosure Requirement E5-2 – Actions and resources in relation to resource use and circular economy

[19], [MDR-A 68 a, b, c, e], [MDR-A, 69 a, b, c]: In addition to circular economy policies that provide the framework for consistent and informed management of business activities, the Group deploys actions and resources related to:

1. **Waste Management**
2. **Resource outflows related to products and services**

Actions are targeted to benefit TIM's customers and employees, both in Italy and Brazil, and involve internal operations and the value chain. In addition, these actions are continuous in order to ensure efficiency in the use of output resources and incentive in the adoption of circular processes.

Financial resources in terms of significant operating expenditures (OpEx) and capital expenditures (CapEx) are also reported in the description of the actions.

### 1. Waste Management

The following actions aim to reduce the consumption of resources such as paper, plastic and encourage the spread of circular models.

#### Domestic BU

- **Installation of water dispensers:** in 2024, there were 10 dispensers in TIM's wholly owned locations, which distributed about 14,400 liters of water with an annual emission savings of about 0.65 tCO<sub>2</sub>eq equal to about 7,200 0.5l plastic bottles.
- **monitoring of paper purchases,** achieved by periodic tracking of purchases. In 2024, about 1,030 t of paper was purchased, including 1,022 t for commercial use and 8 t for office use.
- **monitoring paper consumption for bills, payment reminders and contract termination notices.** Specifically, monitoring activities included:

- bills issued to customers (Consumer fixed and mobile, Enterprise and Server Message Block (fixed and mobile). About 96.5 million bills were issued in 2024, of which about 54.3 million were digital, accounting for 56% of the total (an improvement of 20 percentage points over 2023). OpEx related to this activity amounted to €4,668.482k;
- payment reminders and contract termination notices issued to customers (consumer fixed and mobile, enterprise and smb fixed and mobile). In 2024, 4.3 million payment notices were issued of which 1.6 million were digital or 39% of the total, (an improvement of 28 percentage points over 2023). OpEx related to this activity amounted to €5,942.844k;
- The digitization of customer contracts at the physical sales network. In 2024, implementation of the new mode involving digital contract signing via One Time Password (OTP) was completed, resulting in paper savings of 10 A4 sheets per fixed line contract (NIP/LLU), and 3 A4 sheets per mobile line contract (AL/MNP). The implementation has been enabled across the entire physical sales network, which includes more than 4,000 Points of Sale, both single brand and multibrand. Digital contracts will be effectively operational from 2025. OpEx related to this activity amounted to €438k and CapEx amounted to €412k.

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- **digital invoicing:** in 2024, with the issuance of digital invoices and collections, TIM S.A. avoided the use of 8,142 tonnes of paper and the consequential generation of waste, saving R\$ 471,298,666.13. The initiative also avoids the emission of 10,735 tCO<sub>2</sub>e.

## 2. Resource outflows related to products and services

The initiatives described below are aimed at recovering materials and resources to reduce waste generation and extend the useful life of products.

#### Domestic BU

- **Recovery and reuse of corporate IT equipment and smartphones** (such as PCs, Videos). The collected assets are regenerated for reuse within the company or donated. In 2024 out of nearly 12,000 pieces of IT equipment collected, 7,500 pieces or 64% were recovered while the remainder were disposed of. Of the 7,500 pieces of reconditioned computer equipment, 42% were reused, 7% were donated, and the remaining 51% are available for reuse. This activity resulted in emission savings of about 1,520 tCO<sub>2</sub>eq in the year, equal to about 19,500 Milan-Rome flights. The OpEx related to these activities amounted to €92.7k
- **Trade-in initiatives** aimed at extending the useful life of products and encouraging the recovery of raw materials. In Italy, with the "TIM Rivaluta Smartphone" service aimed at Consumer customers, customers return their old smartphone and receive a discount on a new purchase. The old device is either regenerated or disposed of sustainably. More than 5,500 smartphones were collected in 2024, of which about 80% were reconditioned, with 0.9 t of e-waste diverted from landfills and 0.03 t of rare resources recovered.<sup>16</sup>
- **Replacement of failed products with remanufactured products.** In particular, the following initiatives are highlighted:
  - smartphone replacement service in case of failure or refund in case of theft or loss, aimed at Business customers ("All Risk Assistance" service): in 2024, about 22,000 reconditioned smartphones were given for replacement, accounting for 77% of the total replacements made. The OpEx related to these activities amounted to €2,498k and CapEx €3,594k
  - replacements of failed modems with reconditioned modems for Consumer customers: in 2024, 33,000 replacements were made with reconditioned parts, accounting for 33% of total replacements;
  - modem regeneration through collaboration with inmates of Turin Prison<sup>17</sup>: in 2024, 46,000 modems were reconditioned of which 33,000 were reused. The OpEx related to these activities amounted to €322k
- **Reconditioned smartphones for sale.** TIM offers reconditioned grade-A Apple smartphones to ensure high quality devices at affordable and environmentally friendly prices. Smartphones are purchased from specialized suppliers who recondition the products through a rigorous process of repairing, replacing, and upgrading damaged or worn components. In 2024, 5 different models of Apple smartphones were listed and more than 800 phones were sold. OpEx related to this activity amounted to €226k;
- **Production of physical SIMs with reduced environmental impact:** SIM cards for TIM and KENA customers are made from 100% recycled and recyclable plastic, use flyers made from FSC-certified paper and 100% recyclable plastic bags;
- **Activation of e-SIMs in place of physical SIMs,** to promote material savings associated with physical SIM production and reduce e-waste: an analysis performed on the carbon footprint of e-Sim toward physical SIM<sup>18</sup> showed a unit emission savings of 98%. In 2024, e-SIMs were activated on 77,000 lines with an estimated saving of 9.9 tCO<sub>2</sub>eq. The e-SIM implementation activity involved CapEx of €55k.

<sup>16</sup> Numbers provided by Assurant, partner of TIMFin

<sup>17</sup> Contracted through TIM Service Trade provider

<sup>18</sup> Life Cycle Assessment (LCA) study, performed by Rete Clima, a specialized nonprofit, aimed at assessing the reduction in greenhouse gas emissions of an e-SIM compared to a Physical SIM over the entire product life cycle (from production to disposal)



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- **Trade-in program for mobile phones and smartwatches** where customers can return old devices and obtain a discount on the purchase of new models. All devices undergo a detailed evaluation and, where possible, a repair process in order to be reused/resold. Equipment that cannot be reused or reconditioned is sent for recycling. In 2024, around 3,860 smartphones were collected, of which about 93% were reconditioned.
- **Reuse of abandoned “customer equipment”** (CPM - Customer Premises Equipment) such as modems and routers: the equipment is collected, evaluated, and, depending on its condition, subjected to the reconditioning process for new use. 163,404 modems were reconditioned in 2024.

OpEx related to these two activities amounted to €2,410.14k

[19], [MDR-A 68 d]: With respect to the theme "resource use and circular economy," the double materiality analysis identified the following negative impact: *“the incorrect management of waste by TIM (e.g. electronic waste) and its supply chain (e.g. network components) can contribute to environmental pollution and affect the transition to the circular economy”*.

The aforementioned impact is mitigated through initiatives to optimize and reduce the consumption of resources, such as water and plastic, and to recondition products in order to extend their useful life and limit the waste generation, limiting the damage that the Group's activities can cause to the environment.

## Metrics and targets

### Disclosure Requirement E5-3 - Targets related to resource use and circular economy

[23], [MDR-T, 80 a - j]: Without prejudice to the company's ongoing commitment to adopting circular models in its operations and value chain, TIM has not defined a specific target on resource use at the Group level, defining specific targets that take into account the country context.

In Italy, the different organizational structure has resulted in a substantial change in the size of the infrastructure and population of the Domestic BU, drastically reducing the production of industrial waste related, for example, to network decommissioning activities and the recovery of network equipment and materials.

In this context, the focus has been on products, introducing a specific target of an absolute nature, **“100% TIM brand products with carbon footprint”**, which envisions, by 2026, having the carbon footprint of 100% of TIM brand modems marketed.

The target covers the range of TIM-branded modems and involves suppliers being asked for internationally recognized third-party certifications such as EPD or Carbon Footprint.

In the new 2025-2027 Plan, the goal will become an integral part of the transition plan, further strengthening TIM's commitment to environmental sustainability.

In Brazil, on the other hand, **TIM S.A.** has set a goal to **reuse and recycle 95% of solid waste by 2025**, given the amount of waste generated and commitments made to Brazilian stakeholders. In 2024, the base year of the target, total waste of 2,292.11 tons by eliminating class C and D organic and construction waste was 99.93% reused or recycled. To ensure the scientific soundness of the objective, TIM S.A. has adopted internationally recognized methodologies for waste management, following ISO 14001 standards for environmental management systems.

[24 a, b, d, e, f], [25], [27]: In reference to the Domestic BU, in order to achieve the goal, the Company requires specific ESG parameters and also a certification of the product's carbon footprint in tenders and contracting to give customers a transparent and comparable assessment of the environmental impact. The goal, which translates into a voluntary commitment, not imposed by law, is mainly related to the aspect of circular design, on the use of sustainable materials and the reduction of energy consumption.

In reference to TIM S.A., the company has a goal to dispose of at least 95% of solid waste for reuse or recycling by 2025. This target represents a voluntary commitment, not mandated by legislative obligations, is within the waste hierarchy in the following levels:

- preparation for reuse, ensuring that the products or components can be reused for the same purpose for which they were generated;
- recycling, turning waste into new materials or products, thus promoting the circular economy.

[81 a], [81 b i, ii]: Although it does not have a Group level target, TIM monitors the effectiveness of policies and actions related to impacts to risks on resource use and the circular economy through the following metrics that it monitors on a periodic basis:

- total amount of waste produced;
- total amount, in weight, of waste not directed to disposal;
- the quantity, in weight, of waste destined for disposal by type of treatment.

In addition, the group has the above mentioned international-level ISO 14001 certification for environmental management systems that requires companies to develop processes to reduce waste, improve recycling, and effectively manage disposal.

## Disclosure Requirement E5-5 - Resource outflows

[35], [36 a, b]: In the Domestic sphere, the TIM Group collaborates with a specialized network of suppliers to make products that increasingly respond to circular principles, paying particular attention to TIM-branded products. On modems, which account for about 90% of the total products marketed under the TIM brand, the first model<sup>19</sup> with EPD (Environmental Product Declaration) certification validated by a third party, which provides transparent and comparable information on the environmental impact of the product while also specifying the carbon footprint, was introduced in 2024.

Modems respect the following circularity principles:

- **durability:** modems are designed to guarantee a long operating life, limiting the use of frequent replacement of their individual components, containing the production and generation of electronic waste;
- **reusability and reconditioning:** discarded modems are reconditioned or disposed of in a sustainable manner, promoting reuse and reconditioning of materials wherever possible;
- **repairability and disassembly:** modems are designed to be easily disassembled allowing easier repair work and extending the useful life of the device;
- **recycling:** TIM uses eco-friendly, recycled and recyclable materials for the production of its modems, reducing environmental impact and promoting sustainable resource management. When awarding supplies, TIM requires that the plastics used be recyclable;
- **energy efficiency:** TIM modems are designed to ensure low energy consumption during their use, contributing to a reduced carbon footprint;
- **sustainable packaging:** modem packaging is made from 100% recycled and recyclable cardboard, reducing the use of plastic and other unsustainable materials.

The average lifespan of modems is about 10 years, given the specific technology used by the device, systematic and non-systematic failures, and the availability of replacement parts. In addition, it was required in the bidding process that the Mean Time Between Failures (MTBF) be more than 300,000 hours.

TIM guarantees service and repair of modems, also using reconditioned products. The reconditioning of failed modems is accomplished by retrieving devices returned by customers, checking the status to assess the feasibility of remanufacturing, replacing standardized functional blocks or components, and re-entering the technical service cycle to replace other failed devices.

There is also a special focus on circularity principles on the SIM cards as these products are made of 100% recyclable and recycled plastic (TIM and KENA), while the flyers are all made of FSC-certified paper and the plastic bags are 100% recyclable.

[MDR-M, 77 a], [36 c], [40]: The rate of recyclable content in products and their packaging is expressed in the table below. Specifically, the recyclable content rate in products is 93.17%, while the recyclable content rate in product packaging is 29.94%.

### [36 c] Recyclable content - TIM Group

	UOM	2024
Recyclable content rate in products	%	93.17
Total weight of recyclable content in product packaging	%	29.94

The recyclable content rate of products is calculated using the weight of the TIM HUB+ modem as a reference and applying the same weight to TIM-branded modems. The weight of the modem is 860g, while the weight of the packaging is 360g.

Outbound flows of TIM-branded products are recorded on dedicated management systems, and control over quantities is carried out directly.

[MDR-M, 77 a], [37 a, b, c, d], [38 a, b], [40]: To monitor waste production and improve recovery and reuse activities, the Group collects and analyses waste production data on a periodic basis.

In Domestic, waste is classified according to the European Waste Catalogue (EWC) and is obtained through direct measurements and tracked on dedicated management systems. Waste classification, management and delivery methods are in accordance with Directive 2008/98/EC of the European Parliament and Council, also known as the "Waste Framework Directive."

In Brazil, TIM S.A. to classify and manage waste follows a management approach that tracks the inflow and outflow of resources, which provides an overview of resource consumption, waste generation, and recycling activities. Hazardous and non-hazardous wastes are classified following ISO 14001 to ensure validation and comparability.

Relative to its own operations, the TIM Group produces:

- non-hazardous waste such as mixed packaging and electrical and electronic waste, cables and metals;
- hazardous waste such as batteries and accumulators.

These types of waste are in line with the TLC sector. In addition, materials in the main types of waste generated by the Group include mainly paper, wood and plastic, and metal scraps, consisting mainly of iron, steel and copper.

<sup>19</sup> Model "TIM HUB Pro"

In 2024, the TIM Group generated 5,395.22 tonnes of waste from business operations. The table below provides details of the total amount, by weight, of waste destined and diverted for disposal, distinguished between hazardous and non-hazardous waste, with evidence of the type of treatment.

**[37 a, b, c,d] Waste generated - TIM Group**

	UOM	2024		Total
		Hazardous waste	Non-hazardous	
<b>Total waste generated</b>	<b>t</b>	<b>956.64</b>	<b>4,438.58</b>	<b>5,395.22</b>
<b>Waste not directed to disposal</b>	<b>t</b>	<b>946.33</b>	<b>4,294.17</b>	<b>5,240.50</b>
Waste diverted from disposal for preparation for reuse	t	0.00	87.24	87.24
Waste diverted from disposal through recycling	t	522.95	1,734.84	2,257.79
Waste diverted from disposal for other recovery operations	t	0.00	0.00	0.00
<b>Total waste directed to disposal</b>	<b>t</b>	<b>10.31</b>	<b>144.41</b>	<b>154.72</b>
Waste directed to disposal for incineration	t	5.16	11.16	16.31
Waste directed for disposal for landfill	t	5.16	133.26	138.41
Waste directed for disposal for other disposal operations	t	0.00	0.00	0.00
of which non-recycled waste	t	10.31	144.41	154.72
<b>Percentage of waste not recycled</b>	<b>%</b>	<b>1.08</b>	<b>3.25</b>	<b>2.87</b>

With reference to the information on the amount of waste destined for disposal, the Group assumed that 50% of waste is disposed of in landfills and the remaining 50% is destined for incineration, in line with the "Urban Waste Reports 2023-ISPR" study.

For waste not intended for disposal, specific details cannot currently be provided at the Group level. The only company that currently has this evidence is TIM S.A.. Therefore, the data shown in the table under the headings "waste diverted from disposal through preparation for reuse" and "waste diverted from disposal through recycling" refer to TIM S.A. alone.

In general, the data collection process will be refined in order to provide missing disclosures for all Group companies.

The company takes a structured approach to proper waste disposal, including annual audits that ensure compliance with environmental regulations and ESG commitments.

**[39]:** The following is a breakdown of the total amount of hazardous waste and radioactive waste generated by the Group.

**[39] Hazardous and radioactive waste - TIM Group**

	UOM	2024
Total amount of hazardous waste	t	956.64
Including total amount of radioactive waste	t	0.00

For key information on the subject related to NetCo, please refer to the section "NetCo Performance Information", disclosure requirement E5-5 "Outgoing resource flows".

### 3. SOCIAL INFORMATION

#### Own workforce [ESRS S1]

##### S1-Strategy

##### Disclosure Requirement SBM-2 – Interests and views of stakeholders

[S1 SBM-2, 12]: In setting the strategy and business model, the TIM Group takes into account the interests, opinions and rights of its own workforce. The company collects workers' needs directly through interviews, questionnaires, meetings and indirectly through workers' representatives by implementing policies and actions to meet them.

##### Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

[S1 SBM-3, 14 a]: In identifying the types of workers subject to material impacts as a result of its operations, the TIM Group includes the following definitions:

- **employees** with whom the Group has a direct contractual relationship that can be for a fixed or indefinite period, full time or part-time.
- **non-employee workers** with whom the Group has an indirect contractual relationship through TIM's suppliers. This category includes:
  - workers contracted through the intermediation of temporary employment agencies and/or staffing agencies by including staff with administered contracts, mainly in staff leasing mode (with reference mainly to TIM Retail);
  - self-employed workers, understood as independent professionals who provide services or skills to the company without an employment contract, typically with project collaboration contracts, linked, for example, to business consulting or health care activities for the Assilt institution.

[S1 SBM-3, 14], [S1 SBM-3, 14 b]: The TIM Group double materiality analysis identified significant impacts on its own workforce related to both its own operations, in terms of cybersecurity, sensitive data leakage, incentive systems and training and inclusion initiatives, and value chain operations such as, for example, in relation to worker health and safety.

Specifically, the analysis identified the following **six material negative impacts**, two of which were found to be related to specific incidents, namely:

- “potential cybersecurity threats may involve the leak of sensitive customer and/or employee data”. In 2024, there were only 3 low-impact episodes that did not lead to any data compromise or loss
- “Insufficient safety measures, lack of training and inadequate protective equipment can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain”, taking into account the 25 episodes of injury.

The remaining negative impacts, on the other hand, appear to be of a general nature:

- “Inadequate incentive system can affect employee satisfaction”
- “Inadequate development, inclusion, and work-life balance initiatives can affect employee satisfaction”;
- “A working environment that does not provide employees with the “right to disconnect” results in increased work stress and burnout, with consequences for employee well-being”;
- “The absence of equal pay at executive, managerial and employee levels may require corrective action to encourage the attraction of talent”.

[S1 SBM-3, 14 c]: The TIM Group's double materiality analysis identified **four material positive impacts** related to the TIM Group's own workforce, which are the result of the set of policies, actions and goals that the TIM Group has set for itself in the areas of inclusion, gender equality, training and well-being:

- “The engagement of employees results in greater leadership capacity and professional development, improving job satisfaction”;
- “A flexible organizational environment that promotes the well-being of employees and their families can generate benefits in terms of work-life balance”;
- “Training and reskilling programs on the subject of digital transformation generate new skills to support the professionals of the future”;
- “Incentive mechanisms that encourage employees to adopt sustainable practices promote a culture of responsibility towards environmental and social impact”.

[S1 SBM-3, 14 d, f, g], [S1 SBM-3, 16]: The TIM Group's double materiality analysis found the following **three material risks** related to its own workforce:

- “Human rights violations within the company and along the supply chain may result in legal liability and consequent reputational damage”;

- *"Unauthorized access to the personal data of customers or employees can result in legal liability, regulatory sanctions, economic and financial damage and reputational damage";*
- *"Gender inequalities in terms of pay and positions of responsibility and non-transparent career paths can have consequences on the attraction and retention of talent".*

No material risks referred to forced labor, bonded labor or child labor were found.

The following **three material opportunities** related to the own workforce were then found:

- *"Flexible and hybrid working models can improve employee productivity and well-being, whilst reducing operating costs";*
- *"The enhancement of employer branding along with the provision of professional refresher programs and talent management strategies can help attract and maintain a highly qualified and diverse workforce";*
- *"The establishment of achievable performance objectives for employees promotes company productivity".*

Some risks and opportunities may affect specific groups of people. In particular, the inequalities that could have consequences on the attraction and retention of talent, historically concern the female population despite the company's constant commitment to reduce the pay gap, while employer branding and talent management particularly impact young people and women.

Below is the detail of the risk and opportunity considered to have an impact on these groups of people:

- Risk: *"Gender inequalities in terms of pay and positions of responsibility and non-transparent career paths can have consequences on the attraction and retention of talent";*
- Opportunities: *"The enhancement of employer branding along with the provision of professional refresher programs and talent management strategies can help attract and maintain a highly qualified and diverse workforce".*

[S1 SBM-3, 14 e]: The significant changes in the Group's structure and activities during 2024 make it necessary to define a new Transition Plan (for more details, see the Disclosure Requirement E1-1 "Transition plan for the mitigation of climate change"). However, the Company's long-term strategic direction in environmental matters, aimed at ensuring the progressive decarbonization of operating activities and the supply chain, while respecting workers' rights and in line with international agreements, does not change. Below are the impacts on workers generated by actions taken by the company also to reduce carbon emissions:

- Positive impact: *"A flexible organizational environment that promotes the well-being of employees and their families can generate benefits in terms of work-life balance";*
- Positive impact: *"Incentive mechanisms that encourage employees to adopt sustainable practices promote a culture of responsibility towards environmental and social impact".*

[S1 SBM-3, 15]: Through the double materiality analysis, conducted with engagement initiatives on all categories of its stakeholders and to periodic internal surveys on the level of worker satisfaction, the TIM Group pays particular attention to the female population and that of young people, who are more exposed to possible negative impacts that may result from professional development limitations and issues of gender inequality.

## S1-Impact, risk and opportunity management

### Disclosure requirement S1-1 - Policies related to own workforce

[19], [MDR-P, 65 a]: The aspects of the IROs that emerged as significant from the double materiality assessment for the topic **"Own workforce"** are covered in the **"Code of Ethics and Conduct of the TIM Group"**, in the **"Human Rights Policy"**, in the **"Human Resources and Equal Opportunities Policy"**, in the **"Policy for the management of episodes of gender-based and sexual harassment and bullying"**, in the **"Health and Safety Policy"**, in the **"Information Security Policy"** and in the **"System of rules for the application of personal data protection regulations in the TIM Group"**.

All policies are linked to the following material impacts, risks and opportunities that emerged from the double materiality analysis:

#### Negative impacts

- *"A working environment that does not provide employees with the 'right to disconnect' results in increased work stress and burnout, with consequences for employee well-being";*
- *"Inadequate development, inclusion, and work-life balance initiatives can affect employee satisfaction";*
- *"An inadequate incentive system can have an effect on employee satisfaction";*
- *"The absence of equal pay at executive, managerial and employee levels may require corrective action to encourage the attraction of talent";*
- *"Insufficient safety measures, lack of training and inadequate protective equipment can lead to accidents at work, injuries and damage to the health of employees";*
- *"Potential cybersecurity threats may involve the leak of sensitive employee data".*

### Positive impacts

- "A flexible organizational environment that promotes the well-being of employees and their families can generate benefits in terms of work-life balance";
- "Training and reskilling programs on the subject of digital transformation generate new skills to support the professionals of the future";
- "The engagement of employees leads to a growth in leadership capacity and professional development, improving job satisfaction";
- "Incentive mechanisms that encourage employees to adopt sustainable practices promote a culture of responsibility towards environmental and social impact".

### Risks

- "Gender inequalities in terms of pay and positions of responsibility and non-transparent career paths can have consequences on the attraction and retention of talent";
- "Human rights violations within the company and along the supply chain may result in legal liability and consequent reputational damage";
- "Unauthorized access to the personal data of employees can result in legal liability, regulatory sanctions, economic and financial damage and reputational damage".

### Opportunities

- "The enhancement of employer branding along with the provision of professional refresher programs and talent management strategies can help attract and maintain a highly qualified and diverse workforce";
- "Flexible and hybrid working models can improve employee productivity and well-being, whilst reducing operating costs";
- "The establishment of achievable performance objectives for employees promotes company productivity".

The **Code of Ethics and Conduct** guides TIM's actions in carrying out its business, in the belief that a common vision of ethics in the daily conduct of business is the essential prerequisite for responsible and sustainable growth. Specifically, the document includes:

- the distinguishing values of the Group's culture;
- the rules of ethical behavior for people in the Group and the guidelines for the conduct to be pursued in dealings with third parties;
- the objectives and good practices relating to sustainability and social responsibility, in order to conduct business activities in a way that safeguards the various aspects of the environmental, social and governance-related affairs of the Group;
- the methods of complying with the Code through the description of the commitment of corporate boards and management teams, as well as the approach to managing violations, whistleblowing, and the methods of disseminating and adopting of the document.

In relation to the IROs material to the "Own Workforce" theme, the document underlines TIM's commitment to:

- ensuring a safe, inclusive, fair and stimulating working environment, within a framework of respect for workers' rights and trade union freedoms, focusing on the dignity of the individual and the championing of all types of diversity;
- combating all forms of discrimination based on gender, sexual orientation, gender identity, ethnic or social origin, citizenship, language, religion, political or other opinions, membership of a national minority, disability or age, ensuring that employment relationships are characterized by fairness, equality and equity;
- ensuring equal opportunities at every stage of the collaborative relationship, from hiring to development to career progression, basing every decision solely on the criteria of merit;
- promoting initiatives designed to ensure the work-life balance of employees, the result of a well-established, widely-recognized philosophy of caring and corporate welfare;
- encouraging flexible working and guaranteeing the right to disconnect, thanks to a series of technological tools and IT work platforms.

The **'Human Rights Policy'** aims to make respect for human rights an essential requirement when engaged in the Group's activities, and also concerns third parties who enter into relationships with the company.

The Policy identifies Human Rights that may be affected, directly or indirectly, by activities.

In relation to the IROs material to the "Own Workforce" theme, the protection includes fundamental human rights such as working hours, fair wages, minimum working age, workplace conditions, the protection of maternity rights, the prohibition of harassment; the rights relating to health and safety; the rights designed to safeguard diversity and prevent discrimination based on religion, age, gender, sexual orientation or gender identity, political opinion, social status and origin, race or ethnicity, color, language, physical or mental disability; the rights agreed with the unions and included in the National Employment Contracts; the privacy rights of Group employees.

The policy also sets out the processes through which the Company undertakes to respect human rights. Specifically, all activities within the scope of the policy are subject to periodic internal due diligence inspired by the Guiding Principles of the United Nations Global Compact, which aims to:



- identify and map the human rights risks arising from the Group's operational activities;
- confirm that each topic is governed by a specific internal regulatory framework (for example, policies, procedures), is monitored and tracked (where possible through appropriate indicators) and has had the related responsibilities assigned to it;
- establish a gradual improvement strategy which, beginning with simple compliance with local laws, steers human rights policies and processes towards engagement with the relevant stakeholders, through appropriate initiatives designed to engage them.

The "**Human Resources and Equal Opportunity Policy**" includes the following key content and objectives:

- to improve the management and promotion of human resources in TIM;
- to illustrate the principles behind the actions carried out by all the companies of the Group, so that they become current practice within the company and for external partners with whom the Group enters into business relationships.

With regard to the IROs of reference, the policy underlines the commitment to:

- ensuring engagement, respect and inclusion, fostering an inclusive working environment, not allowing any form of discrimination in recruitment, remuneration, access to training, promotion or retirement, and safeguarding the right to accessibility of systems, equipment and workstations for all employees with disabilities;
- fostering a good work-life balance, including flexible working as an integral part of the new organizational model;
- delivering development and training, establishing career routes for individuals for career management and targeted and diverse training courses to consolidate professional skills, upgrade or retrain;
- adopting a fair and balanced system of remuneration, with fixed and variable components for the short and long term, which also includes a sustainability component, to attract, retain and motivate people;
- protecting the health and safety of employees and preventing occupational diseases, assessing safety risks and adopting the principles, standards and solutions that constitute 'best practices' for prevention, both in terms of appropriateness and effectiveness;
- protect freedom of association and the right to collective bargaining, recognizing and respecting the right of workers to form and/or join trade unions for the protection of individual and collective interests;
- protect personal data, adopting a well-structured organizational model that can ensure the correct application of the relevant legislation.

With the '**Policy for the management of episodes of gender-based or sexual harassment and bullying**', the company is committed to showing zero tolerance for gender-based or sexual harassment, bullying or similar behaviors, promoting respect between people and creating opportunities to raise awareness on the issue of harassment, in all its forms, as well as disseminating information on the tools available to everyone to prevent, limit and manage harassment.

Specifically, the commitments regard:

- the raising of employee awareness and the training of people;
- the provision of an anonymous process for reporting and managing episodes of harassment, which can be accessed by individuals without company mediation;
- the provision of free legal advice, psychological assistance for the victim and a "Person of Trust", an external, impartial figure with experience with harassment, bullying or on sexually inappropriate behavior, who can provide clarification on company policy or on the channels available to address problematic situations.

The '**Health and Safety Policy**', drafted in accordance with UNI EN ISO 45001 provisions, aims to:

- foster the reduction of accidents, occupational diseases and other accidental events, through the implementation of appropriate prevention and control measures;
- ensure full compliance with legal requirements and mandatory safety requirements on the design, construction and management of buildings;
- guarantee the best living conditions for working environments and services for people;
- assess risks to the safety and health of workers, with a view to gradually eliminating these or reducing them to a minimum through the adoption of best practices.

In relation to the IROs material to the "Own Workforce" theme, the document also underlines TIM's commitment to:

- empowering the organization, on the basis of specific skills, to manage safety in a proactive manner, where each worker plays an active role in improvement and prevention initiatives;
- promote a transparent dialogue with workers and their safety representatives with regard to activities, performance and goals related to health and safety.

The '**Information Security Policy**' focuses on the protection of information and all related assets, as a fundamental element for the safeguarding and continuity of business processes.

The Group undertakes to:

- establish processes, roles and responsibilities to ensure information security;
- guarantee a level of confidentiality, integrity and availability of information that is proportional to the respective business value, or to the direct or indirect losses that a security incident may have with regard to the services provided to customers.

In relation to the IROs of reference, the policy also aims to:

- guarantee the security of personal information pertaining to employees, in compliance with the legislation in force, and in order to protect the employee;
- raise awareness and train staff on the safety of information.

In order to achieve the objectives set out in the policy, TIM has adopted an Information Security Management System designed to ensure the correct governance of specific processes and activities for the security of information assets.

Finally, the **“System of rules for the application of personal data protection regulations in the TIM Group”** sets out the norms and operating rules for the TIM Group that govern the processing of personal data, in accordance with the applicable legal and regulatory provisions on personal data protection.

This document concerns the correct processing of personal data of all the company's stakeholders, defining the methods of corporate monitoring and the corresponding responsibilities, as well as the technical/administrative measures for data protection.

With regard to TIM workers (employees and those treated as such), the document draws attention to the regulations and procedures to be observed when processing the personal data of the abovementioned parties during the phase prior to the establishment of the working relationship, during the course of the same, and in the termination phase.

To place the Group's policies in context within the Brazilian business world, TIM S.A. has also established a series of policies to guide and manage the impacts on its workforce. The following are of particular note:

- The **“Diversity and Inclusion”** policy, which aims to set out guidelines for managing diversity and inclusion issues in processes related to managing people at TIM S.A. at all hierarchical levels, including the presence of social groups (gender, race/ethnicity, generations) on the company's Board of Directors. TIM S.A. also encourages its partner companies and suppliers to foster inclusive working environments and relationships, with a particular focus on improving diversity and implementing policies and programs designed to promote inclusion.
- The **“Health and safety at work”** policy, which sets out the principles to be applied across all TIM activities in Brazil with a view to promoting continuous improvement in terms of carrying out health and safety-related actions at work. Among other things, TIM Group's commitments include compliance with the relevant regulations, risk management, activities to provide training and raise awareness, and the analysis of accidents or injuries, with a view to preventing these or minimizing the effects thereof.
- The goal of the **“Corporate Development and Learning”** policy is to establish guidelines and criteria for offering individual or collective development and learning opportunities, in line with the strategy and the corporate culture of the Group, and in a manner that values the contribution of each individual. The policy sets out the model, plan and actions for development and learning.

**[19], [MDR-P, 65 b]:** The Code of Ethics and Conduct applies to all people in the Group, with particular reference to the members of the Corporate Boards, management, employees of all Group Companies, external collaborators, and, where required by the company's procedural system, to third parties in business relationships with the Group. The Human Rights, Human Resources Policy and Equal Opportunity Policy covers all people in the TIM Group and aims to protect the rights of all third parties who enter into business relations with the company.

The Information Security Policy is for all Group functions and companies that, within the scope of their specific responsibilities, operate in various ways using company information and data. The policy for the management of episodes of gender-based or sexual harassment and bullying and the system of rules for the application of personal data protection regulations in the TIM Group are aimed at TIM's employees.

**[19], [MDR-P, 65 c]:** The adoption of the Code of Ethics and Conduct was decided by resolution of the TIM Board of Directors on March 15, 2023. A periodic review of the Code is also ensured to implement any necessary updates.

The adoption of the Human Rights Policy was implemented from the first levels of the main company functions affected, including Corporate Communication & Sustainability, Human Resources & Organization, Compliance, Legal & Tax as well as the other business functions. Specifically then, the Corporate Communication & Sustainability Department is responsible for updating the policy; the Human Resources & Organization department is responsible for complying with the policy with respect to TIM's people, while the Procurement department is responsible for complying with the policy in relation to the involvement of the Group's suppliers; the Compliance department oversees the risk of non-compliance with applicable regulations.

The Human Resources and Equal Opportunities Policy was drafted and approved in collaboration with the Human Resources Department and the Gender Equality Steering Committee.

The Policy for the management of episodes of gender-based or sexual harassment and bullying has been drafted and approved in collaboration with the Compliance department and the Human Resources & Organization department.

The adoption of the ‘TIM Health and Safety Policy’ is guaranteed by the Health, Safety & Environment department, which ensures the monitoring of issues relating to prevention, safety and health for workers, and by the Real Estate department, which is responsible for implementing compulsory occupational health and safety measures in company buildings.



The Information Security Policy is approved by the Compliance, Public Affairs, Security & International Business Office and Human Resources & Organization departments, in order to ensure consistency between TIM's strategy and the policy content.

The adoption of the "System for the application of personal data protection regulations in the TIM Group", is ensured both within TIM and in the Group companies by internal privacy officers, with any necessary support and advice provided by the Privacy department (TIM) and the Privacy Coordinators (Group companies). In fact, the Privacy department is responsible, within the context of the role of TIM's Data Protection Officer (DPO), for steering, coordinating and overseeing the correct application of privacy legislation at Group level; in the Group's companies, this role is held by the Privacy Coordination figure, in conjunction with TIM's DPO.

**[19], [MDR-P, 65 d]:** The Code of Ethics and Conduct and the Human Resources and Equal Opportunities Policy are in line with the principles of the United Nations Global Compact, which TIM has joined.

As far as the Human Rights Policy is concerned, the key third-party references used to draft this document are as follows:

- UN Universal Declaration of Human Rights, 1948
- UN International Covenant on Civil and Political Rights, 1976
- UN International Covenant on Economic, Social and Cultural Rights, 1976
- UN Human Rights Council, Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, A/HRC/17/31, 2011
- UN High Commissioner for Human Rights, Guiding Principles on Business and Human Rights, Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011
- UN Global Compact Office and Office of the United Nations High Commissioner for Human Rights, A Guide for Business: How to Develop a Human Rights Policy (2011 e 2015)
- UNICEF and The Danish Institute for Human Rights, Children's Rights in Impact Assessments, December 2013
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998
- International Labor Organization, Conventions 1, 29, 30, 87, 98, 100, 105, 111, 135, 138, 144, 155, 161, 171, 175, 182, 183
- International Labor Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy
- Amnesty International — Italian chapter, Universal Declaration of Human Rights
- CSR Europe Assessing the effectiveness of company grievance mechanisms, 2013
- European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, 2013
- OECD, Guidelines for Multinational Enterprises, 2011
- Charter for Equal Opportunities and Equality at Work, signed by Telecom Italia in 2010.

For the "Policy for the management of episodes of gender-based or sexual harassment and bullying", the main third-party references used when drafting the policy are as follows:

- Communication from the Commission of the European Communities to the Council and the European Parliament, dated November 8, 2007, to present the European Framework Agreement on workplace harassment and violence signed on April 26, 2007 by CES, BUSINESSEUROPE, UEAPME and CEEP
- CCNL TLC February 1, 2013: Art.45 — Company relationships (see points 1, 2 and 4) and Art. 48 — Dismissal for misconduct: A) Dismissal with notice — point 2 - letter g); B) Dismissal without notice — point 4 - letter o)
- Interconfederal Agreement of January 25, 2016. Framework Agreement on Harassment and Violence in the Workplace by Confindustria and CGIL, CISL and UIL
- Framework Agreement on harassment and violence in the workplace signed between Assotele — Asstel and the SLC CGIL, FISTEL CISL, UILCOM UIL on January 16, 2019
- Italian Civil Code: Article 2043: Non-contractual liability
- Criminal Code (Art. 594: Injuria (insult), Art. 595: Defamation, Art. 604 bis: Propaganda and incitement to commit crimes on grounds of racial, ethnic and religious discrimination, Art. 609 bis: Sexual violence, Art. 612: Threat, Art. 612 bis: Persecuting acts, Art. 660: Harassment or disturbance to people)
- Legislative Decree May 30, 2005, n. 145 "Implementation of Directive 2002/73/EC on equal treatment between men and women, with regard to access to work, training and professional promotion
- Italian Law no. 38 of April 23, 2009 "Conversion into law, with amendments, of Decree-Law no. 11 of February 23, 2009, containing urgent measures in the field of public safety and the fight against sexual violence, as well as with regard to acts of persecution"
- Legislative Decree no. 81 of June 15, 2015, "Organic regulation of employment contracts and revision of the legislation on professional duties, in accordance with Article 1, paragraph 7 of the Italian Law no. 183 of December 10, 2014" ("Jobs Act")

- Italian Law no. 179 of November 30, 2017, “Provisions for the protection of whistleblowers reporting offences or irregularities that have come to their knowledge as part of public or private employment”
- Budget Law 2018 (Italian Law no. 205 of December 27, 2017)
- Italian Law no.69 of July 19, 2019, “Amendments to the Criminal Code, the Code of Criminal Procedure and other provisions regarding the protection of victims of domestic and gender-based violence.”

The Health and Safety Policy is inspired by the international standard on occupational health and safety management systems, ISO 45001.

For the Information Security Policy, the main external references of the document refer to:

- ISO/IEC 27000:2018 - Information technology - Security techniques - Information security management systems - Overview and vocabulary
- ISO/IEC 27001:2022 - Information security, cybersecurity and privacy protection – Information security management systems - Requirements
- ISO/IEC 27002:2022 - Information security, cybersecurity and privacy protection — Information security controls
- ISO/IEC 27035-1:2023 Information technology - Information security incident management - Part 1: principles and process
- ISO/IEC 27035-2:2023 Information technology - Information security incident management - Part 2: Guidelines to plan and prepare for incident response
- ISO/IEC 27035-3:2020 Information technology - Information security incident management - Part 3: Guidelines for ICT incident response operations.

For the ‘System of rules for the application of personal data protection regulations in the TIM Group’, the main regulatory references are as follows:

- General Data Protection Regulation (GDPR)
- Personal data protection code (Legislative Decree 196/2003 as amended)
- Data Protection Authority Orders

**[19], [MDR-P, 65 e]:** The Group Policies specifically take into account aspects identified as fundamental and priority by analyses conducted internally and with internal stakeholders through questionnaires and interviews. These aspects are strongly linked to the operations of the TIM Group Companies.

**[19], [MDR-P, 65 f]:** To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group’s company website, in compliance with “least privilege” and “need to know” principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some of the policies, such as the Code of Ethics.

Information relating to TIM S.A.’s policies is instead available on the relevant institutional website in the dedicated “Regulations and Policies” section <https://ri.tim.com.br/en/esg/regulations-and-policies/>

**[20 a, b]:** TIM Group’s Human Rights Policy explicitly recalls the OECD Guidelines for Multinational Enterprises, the Declaration on Fundamental Principles and Rights at Work issued by the International Labor Organization, and is in line with the principles of the United Nations Global Compact (TIM is among the founders and active participants of the Global Compact Networks in Italy and Brazil).

In order to identify and address potential negative impacts on human rights, Tim conducts regular due diligence to identify and map the potential risks that derive from the Group’s operational activities, and to establish measures for improvement.

The Policy, which is referred to in the majority of company policies, operating procedures, and management systems, involves all its own workers, explicitly encouraging feedback with a view to achieving improvement.

**[21]:** The Group’s Human Rights Policy is aligned with all the guiding principles of the United Nations, the OECD and the International Labor Organization, as can be seen from the following references explicitly mentioned in the document:

- UN Universal Declaration of Human Rights, 1948
- UN International Covenant on Civil and Political Rights, 1976
- UN International Covenant on Economic, Social and Cultural Rights, 1976
- UN Human Rights Council, Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, A/HRC/17/31, 2011
- UN High Commissioner for Human Rights, Guiding Principles on Business and Human Rights, Implementing the United Nations “Protect, Respect and Remedy” Framework, 2011
- UN Global Compact Office and Office of the United Nations High Commissioner for Human Rights, A Guide for Business: How to Develop a Human Rights Policy (2011 e 2015)
- UNICEF and The Danish Institute for Human Rights, Children’s Rights in Impact Assessments, December 2013
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998

- International Labor Organization, Conventions 1, 29, 30, 87, 98, 100, 105, 111, 135, 138, 144, 155, 161, 171, 175, 182, 183
- International Labor Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy
- OECD, Guidelines for Multinational Enterprises, 2011.

[22]: In its Policy on Human Rights, TIM explicitly condemns any form of forced or bonded labor, as well as any form of exploitation of children and young people, specifying also that people under 18 years of age are not employed.

[23]: TIM operates a Health and Safety management system (SSL) that includes procedures and policies designed to ensure that the working environment is safe and that measures are implemented to prevent injuries and occupational diseases.

In accordance with the provisions of the UNI EN ISO 45001 standard, the 'Health and Safety Policy' establishes the principles at the core of the management system with regard to the prevention and reduction of injuries, occupational diseases and other accidental events, through the implementation of appropriate prevention measures and checks. There are also specific internal procedures that govern the management of injuries and accidents. Within Italy, the procedure relating to the "management of injuries in workers" specifies that occupational accidents must be subject to specific investigations designed to examine the causes of the event, in order to implement any corrective measures and actions for improvement with the direct involvement of the lines concerned and the Human Resources department. In Brazil, the internal procedure entitled "Management of work events" stipulates that all accidents or injuries must be analyzed by the team of occupational health and safety professionals, that the causes must be identified, and that action plans are drawn up with a view to preventing further events of the same nature in the future.

TIM S.A. also adopts an occupational health and safety management system within the Brazilian context, with essential processes and initiatives to maintain a healthy, safe environment for its workers. The key elements of this system include compliance with reference standards; risk management; training and awareness activities; accident prevention and mitigation; process of continuous improvement.

[24 a, b]: When addressing the issue of discrimination within its policies, TIM takes race and ethnic origin, skin color, gender, sexual orientation, gender identity, disability, age, religion, political opinions, national ancestry or social background into consideration, as well as any other form of discrimination.

TIM implements a number of policies designed to promote equal opportunities and inclusion, including those related to the prevention and management of episodes of gender-based and sexual harassment and bullying. Specifically:

- in the Code of Ethics and Conduct, TIM prohibits any form of discrimination or harassment
- in the Human Rights Policy, TIM sets out its commitment to being a proactive promoter and leader of these rights
- in the Human Resources and Equal Opportunities Policy, TIM condemns all forms of discrimination, harassment and mobbing
- In the Policy for the management of episodes of gender-based and sexual harassment and bullying, TIM undertakes not to tolerate gender-based or sexual harassment or bullying, or any similar behavior.

[24 c]: In its policies, the TIM Group demonstrates a particular focus on employees who belong to groups that are particularly at risk of vulnerability, such as women, people with disabilities, older workers, workers with health problems and workers belonging to racial, ethnic or religious minorities.

[24 d]: To ensure that discrimination is prevented, mitigated and addressed once detected, TIM has adopted a specific whistleblowing procedure that allows workers to report illegal behavior and violations of the code of ethics within the organization, without fear of reprisals.

## Disclosure Requirement S1-2 - Processes for engaging with own workforce and workers' representatives about impacts

[27 a, b, c]: The Group is dedicated to constantly engaging and dialoguing with its workforce, both directly and through employee representatives. For example, in 2024, the Group involved a sample of 463 people from the "People of TIM" category (one of the Group's 8 main stakeholder categories) in the double relevance analysis designed to identify the relevant impacts of TIM activities on the environment, people and governance.

In the Domestic sphere, the company also sought the constant involvement of employee representatives, organizing more than 80 meetings at national and regional level in 2024. Themes such as supplementary corporate bargaining (performance-related bonus), the safeguarding of employment boundaries (solidarity contract) and organizational developments were discussed.

In addition, several meetings of the joint commissions (bodies within the area of consultation) were held, as provided for by the TIM industrial relations model - essential for maintaining a dialogue between the social partners and the company. These committees, composed of representatives from the company and labor organizations, are tasked with taking a technical look at specific subjects, including training, occupational health and safety, welfare and equal opportunities.

During trade union meetings, any general demands expressed by workers can also be discussed, which can then be highlighted to the company (such as but not limited to: work-life balance, training, working hours). Provided that they are sustainable and compatible with the business choices, these instances can be finalized through union agreements.

TIM's industrial relations model also aims to promote information, consultation and negotiation within the framework of legal and contractual provisions, which includes representation at both national and regional levels.

In particular, Unitary Trade Union Representations (RSUs) are present at regional level, in order to encourage adequate participation in the grass-roots discussion. In addition to the protections and rights afforded by law and by the collective bargaining agreement, TIM also recognizes specific additional prerogatives for the trade union representatives in the company. Employees can use the company intranet to view any news related to the contents of the main trade union agreements. With regard to the involvement of the representatives, the resources are established in the budget, in accordance with the projects and agreements that the company intends to implement. The Industrial Relations function within the Human Resources & Organization Department has oversight of the involvement of representation, within the legal and contractual frameworks applied, while for the double relevance analysis, the involvement of own workers is in charge of the Sustainability function within the Corporate Communication & Sustainability Department.

TIM S.A., in managing its actual and potential impacts, also involves employee representation at the national and territorial levels, particularly in situations involving collective bargaining agreements and their respective negotiations, the profit-sharing program, and any internal reorganizations that could result in massive employee layoffs. As in Italy, collective bargaining is applied to all employees.

In TIM S.A., the People, Culture & Organization function has within it the Trade Union & Labor Relations function, which is responsible for and monitors relations and negotiations with trade unions.

**[27 d]:** The TIM Group operates in full compliance with the relevant legislation on human rights, and is committed to preventing any violations related to its activities in accordance with the UN guidelines. Accordingly, even in the absence of a global framework agreement between the company and the workers' representatives regarding respect for the human rights of its own workforce, the company has adopted a specific policy on Human Rights which is aimed at all of its stakeholders. Furthermore, when establishing trade union agreements and the regulations governing the employment relationship, TIM takes all fundamental human rights into account, with the commitment to ensuring that they do not affect freedom, dignity, equality and justice.

**[27 e], [28]:** The TIM Group assesses the effectiveness of its own worker involvement by monitoring worker participation in the relevance analysis and through analysis of responses received to the survey on the Climate and Welfare Survey.

In particular, the views gathered through interviews and questionnaires, contribute to the construction of the Group's inclusion plan that values the uniqueness of each individual, ensuring flexibility and customization of corporate initiatives, policies and projects. The main areas of intervention include disability, sexual orientation, gender identity, ethnicity and religion. TIM actively promotes an inclusive culture both inside and outside the organization. In Brazil, TIM S.A. promotes a Diversity and Inclusion program that values vulnerable categories of the workforce through the Affinity Groups initiative, which includes Women+, +Colors, Pride+, We Are+ and Generations+, with the aim of promoting an inclusive dialogue and culture and implementing meaningful projects to enhance differences in the company.

## Disclosure Requirement S1- 3 - Processes to remediate negative impacts and channels for own workers to raise concerns

**[32 a, b]:** TIM monitors significant negative impacts that have arisen for its own workforce with specific policies, processes, actions and reporting channels if workers wish to communicate concerns or needs directly to the Company and have these addressed.

With reference to this last point, TIM and the Group companies provide internal channels to report any information regarding TIM Group Staff and/or third parties to the Supervisory Body, regarding violations of laws and regulations, the Group's Code of Ethics and Conduct, the 231 Organizational Model, as well as the system of rules and procedures in force in the TIM Group.

In the **Domestic**, the **main reporting channels** are noted below:

### ■ Whistleblowing

- Whistleblowing Portal, which is designed to guarantee the confidentiality of the whistleblower's identity through the use of secure protocols and encryption tools. After entering the report, the portal provides a Unique Identifier Code, which can then be used to check the processing status of the report and to send and receive communications (including anonymously). This channel is available to employees, former employees, job candidates, partners, customers, suppliers, consultants, collaborators, partners and, more generally, anyone who has a legitimate interest in the business activities of the TIM Group. The reports are received by the TIM Supervisory Body or the TIM Group company concerned, which then uses TIM's Audit department to carry out in-depth investigations;
- voicemail of the toll-free number 800664411 of the Whistleblowing service;
- standard mail to the Supervisory Body of TIM or the TIM Group company concerned, addressed to the company's registered office.

### ■ Health, safety and environment

- an internal reporting channel, accessible to each department manager within the company, in relation to the Health, Safety and Environment component, implementing the regulation "Employer responsibilities regarding health and safety in the workplace and environmental protection - checks on the work of delegated persons";

- internal reporting channel for complaints relating to construction activities and network maintenance (noisy manhole covers, damage to underground services on site, etc.).

#### ■ Security

- internal email reporting channel that employees can use if they become aware of a security vulnerability in systems, corporate applications or TIM-branded products accessible from the internet;
- an intranet portal for reports of security incidents, which concern human, material and immaterial resources;
- an internal channel that ensures 24-hour monitoring of critical events and the management of IT security incidents in conjunction with the relevant functions;
- a form dedicated to reports relating to episodes of "abuse", to be understood as "any activity committed on the network and/or through the use of TIM Group assets for the purpose of committing crimes or causing damage to third parties, in violation of company rules and/or legislative provisions";
- in internal channel for reporting spam/phishing emails, accessible from employee inboxes: spam@telecomitalia.it.

In Brazil, TIM S.A. in addition to the **Whistleblowing** channel, provides its employees with an additional anonymous reporting channel for workplace accidents, within the corporate intranet. In addition, employees can directly contact the Health, Safety and Environment team and the People, Culture and Organisation team through the Meu RH channel, to report any specific concerns or needs.

**[32 c]:** Within the Group, the Supervisory Board, of TIM and its respective subsidiaries oversees the process of handling complaints and grievances concerning personnel, maintaining the responsibilities and prerogatives of the Board of Statutory Auditors for reports addressed to it, including complaints under Article 2408 of the Civil Code.

In order to follow up on reports, the TIM Supervisory Bodies and those of the Group's subsidiaries rely on the assistance provided by TIM's Audit Department, which carries out the investigation, acquiring the necessary information from the departments concerned and engaging the relevant business functions, whilst also making use of experts or advisors external to TIM, where deemed necessary.

The investigative phase of the Report verifies the merits of the reported circumstances, reconstructs the management and decision-making processes based on available evidence, and provides guidance for corrective actions to resolve the detected irregularities. Evaluations of the merits or appropriateness of decision-making and management aspects are not included in the inquiry analysis unless they are manifestly unreasonable.

At the end of each investigation, the results are communicated to TIM's supervisory body, and, for reports on subsidiaries, also to the supervisory body of the relevant subsidiary company. The Supervisory Body then decides whether or not to close the report, highlighting any failure to comply with rules/procedures, without prejudice to the exclusive competencies of the Chief Human Resources & Organization Office function, with regard to disciplinary actions.

The results of the investigations are summarized in a report or, for significant and/or complex cases, in a preliminary note. This includes a judgment based on the facts reported, the outcome of the activities carried out and the results of any previous investigative activities, as well as any indications for corrective actions in the areas and business processes examined.

The Supervisory Body must track the progress of the corrective actions via the information periodically provided by the Audit Department.

In Brazil, TIM S.A. has implemented a periodic monitoring system for employee health and safety risks, which includes direct observations, document analysis, inspections, and internal and external audits. The company conducts periodic simulations of emergency cases and has an Emergency Response Plan (ERP) for handling critical scenarios.

To ensure a fair and safe working environment, TIM S.A. provides mechanisms for reporting and handling complaints related to personnel issues. In accordance with the Collective Bargaining Agreement 2024/2026, employees have access to free legal aid for criminal proceedings related to their functions, except in cases of negligence or willful misconduct.

The company also offers specific tools for handling reports of discrimination, harassment or other forms of intolerance in the workplace (LGBTI+phobia, racism, misogyny, ageism, religious intolerance, moral or sexual harassment). Employees who are victims of such situations can seek legal support and benefit from the company's guaranteed criminal defense.

TIM S.A. provides a social worker and/or psychologist for psychological support to employees in vulnerable situations. This service is part of the Bem+Estar Conception Program, aimed at promoting the well-being of employees and their families.

The company guarantees the confidentiality of reports and has set up dedicated communication channels for handling complaints and grievances, ensuring an appropriate intake and response process in compliance with current regulations and company best practices.

**[32 d]:** In reference to reporting channels for the workforce, at the Group level TIM provides various tools and initiatives integrated into the work environment:

- Corporate intranet platform, which serves as a central hub for internal communications and includes a section dedicated to reporting channels, including the Whistleblowing channel.
- TIM Academy training platform, accessible from the Corporate Intranet, offering training courses on corporate issues, including modules dedicated to Whistleblowing, sexual harassment prevention and anti-bullying.

- Internal events with Q&A sessions, available both live and offline, to provide clarification on reporting processes and to collect questions, evaluations and suggestions through feedback questionnaires.

With reference to TIM S.A. alone, the Whistleblowing channel is made available to all employees through structured and continuous communication, which includes:

- The dissemination of corporate policies and procedures in official regulatory documents.
- The inclusion of information in the company's Code of Ethics.
- Mandatory online training to make employees aware of the use of reporting channels.
- The publication of informative posts on the company intranet homepage.
- Participation in live sessions and other outreach initiatives aimed at enhancing awareness and accessibility of reporting mechanisms.

[32 e]: The company controls and monitors the issues raised through the supervisory bodies of TIM and the subsidiary companies, making use of the support of TIM's Audit department and ensuring the effectiveness of the various channels, following up on reports and analyzing these in a detailed and timely manner.

At TIM S.A., the Whistleblowing channel is managed by the company's Internal Audit department, which reports directly to the Board of Directors. Complaints are submitted during regular meetings of the Internal Control Committee (CAE) and the Control and Risk Committee (CCR). The effectiveness of the whistleblowing channel is assessed annually through independent evaluations (external and internal), with regard to the way that it is managed, as well as to the management systems in place. In addition, it is monitored and measured through key performance indicators. Employee feedback is also collected through surveys conducted after presentations given to different functions of the Company.

[33]: TIM monitors the degree of awareness and reliability of reporting channels through employee feedback, collected through:

- Analysis of interaction with information materials on the intranet;
- Feedback questionnaires in online training courses;
- Internal events with question and comment sessions;
- Business climate surveys, which include assessments of trust in reporting channels.

To protect workers, including their representatives, from retaliation, TIM has adopted specific policies, such as the Whistleblowing Procedure and the Policy on Handling Gender, Sexual Harassment and Bullying Incidents. These documents guarantee anonymity of reports, confidentiality of information, and a zero-tolerance policy toward any form of retaliation.

In TIM S.A., the Whistleblowing channel is supported by an ongoing awareness and training program, while the results of business climate surveys guide any improvement actions.

## 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

[37], [MDR-A, 68 a, b, c, e], [MDR-A, 69 a, b, c]: In addition to the policies on "own workers", which provide the framework for the coherent and informed management of business activities, the Group also implements measures and resources related to the following issues:

1. **working conditions:** adequate wages; working hours, work-life balance; health and safety;
2. **equal treatment and opportunity:** training and skill development, gender equality and equal pay for equal value work; diversity, gender equality and equal pay for work of equal value;
3. **other labor-related rights collective bargaining:** social dialogue; freedom of association; confidentiality.

The actions are aimed at both own workers in Italy and Brazil and, where not specified they constitute an ongoing nature and are repeated annually.

Due to the corporate discontinuity that occurred on July 1, 2024, it is not possible to provide comparative information on the activities compared to those of previous years.

### 1. Working conditions

The main, ongoing actions in the areas of adequate wages, working hours, work-life balance, and health and safety are highlighted below.

#### Domestic BU

##### ■ Adequate wages

- Adoption of remuneration policies aimed at ensuring adequate remuneration for the entire corporate population and resulting in individual and collective short- and long-term incentive systems (Result Bonus, Sales Incentive Plans, Short Term and Long Term) for the achievement of corporate objectives of a commercial, economic-financial and ESG scope.



- Definition of indicators in managerial incentive systems with targeted targets aimed at reducing the Gender Pay Gap.

#### ■ Work-life balance

- Continued implementation of Agile working. The agreement, which was entered into on November 22, 2022 and is currently being extended until March 16, 2025, provides for three days of work at home and two at headquarters. Membership is voluntary and there is provision for expansion of flexible working days for certain personal situations such as pregnancy, maternity/paternity, and medical treatment. In 2024, the take-up rate was 93.48% of eligible employees.

#### ■ Health and Safety

- Management and verification of measures to protect the health and safety of workers, in line with Legislative Decree 81/08 through the preparation of the Risk Assessment Document (DVR) by the Health Safety Environment (HSE) function, which contains all prevention measures in order to manage and reduce risks in the workplace.
- Preparation of investigations by the local safety departments, which deal with emergency plans, the appointment of firefighters, the management of first aid, the planning of evacuation tests and the conduct of inspections necessary for the selection of risk reduction measures in extraordinary situations;
- Periodic redefinition of environmental requirements necessary for the mitigation of hazards in the work environment. The activity provided OpEx of €68k.
- Management and organizational engagement actions to develop an organizational culture that include semi-annual participation of the Head of Prevention and Protection (RSPP) in the Safety Steering Committee;
- Informational activities through the company intranet or in person to collect reports of employee concerns when verifying the application of the rules.
- Preparation of visit protocols that covered about 4,600 TIM workers for the following risks: VDU work, risk of manual handling of loads for technical roles, risk of working at height, risk of electromagnetic fields, chemical risk.
- Dedicated training: 25,681 hours of health and safety training were conducted during 2024, including on first aid and environmental emergency management.

Financial resources used for health protection activities amounted to an OpEx of €425.98k.

#### TIM S.A.

#### ■ Work-life balance

TIM S.A. provides its employees and family members with a health care program that includes:

- social service and personal support: free support for employees and family members in sensitive social situations, available 24/7 via phone or e-mail, with remote services included.
- Women's Versions program: free consultations for menopausal women, with opportunities to participate in group meetings and lectures on the topic.
- Sintonize em Você: promotion of emotional well-being through conversation circles, workshops, and psychological support to cope with difficult moments and know when to ask for help.

#### ■ Health and Safety

- Projects and campaigns to promote health and safety culture: Each year, Bem+Estar Week offers safety, health and environmental initiatives for employees. In 2024, the main topics covered were physical and mental health care and awareness of diseases such as hypertension and sexually transmitted diseases.

## 2. Equal treatment and opportunity

The following highlights the main, ongoing actions in training and skills development, gender equality and equal pay; diversity and inclusion.

#### Domestic BU

#### ■ Training and development

- Onboarding program dedicated to more than 300 newly-hired employees, with training, work experience visits and meetings with members of the management team.
- “Women Empowerment” path dedicated to 200 women with high potential for growth in managerial roles. The financial resources used in 2024 amounted to OpEx of €1125k.
- Individual development plans through coaching paths. In 2024, 400 people were involved with a total of 4,000 hours provided. The financial resources used in 2024 amounted to OpEx of €25k.
- Collective development plans, such as the “Red Card” project dedicated to 25 new managers, with a view to providing them with the tools they need to address complex issues within the environment and to manage resources. The financial resources used in 2024 OpEx were €24k.
- A “reskilling and upskilling” project focused on technological skills and soft skills to support digitalization. In 2024, the initiative recorded 280,000 hours of training and the involvement of 14,400 people. The financial resources used in 2024 amounted to OpEx of €1,300k.



- Initiatives for 1,100 colleagues Under 35 including: participation in Mentoring Academy to enhance engagement and strengthen strategic skills; enrollment in the LinkedIn Learning platform, with an ecosystem of more than 30,000 useful training modules to boost continuing education; the Young Generation with Higher Education Engagement activities and the Ideathon.
- Age Empowerment Program: initiatives to improve motivation and employability with special emphasis on senior employees.
- Staff assessment: 170 assessments were conducted in 2024 dedicated to entry-level management positions (agile assessment) and leadership roles with executive weight (Managerial assessment).
- Performance Management involves continuous annual evaluation of the performance and behavior of the entire corporate population. The financial resources used in 2024 amounted to OpEx of €112k.

#### ■ Diversity and Inclusion

- Disability Management Plan with the goal of empowering colleagues to enable them to go about their working day peacefully. The financial resources used in 2024 amounted to OpEx of €26.7k.
- “Deaf Inclusive” program to enable colleagues to communicate more easily through supplementary technological equipment.
- “Nobody Excluded” project with the goal of providing specific computer equipment to people with disabilities;
- Annual awareness and training programs on dyslexia and neuro-diversity, designed to increase awareness within the company.

#### TIM S.A.

#### ■ Training and development

- “Black Pearls” program to enhance and accelerate the careers of “black professionals” with potential so that they can assume leadership positions in the Company.
- “TIM 50+” program for employees over 50 years old designed to promote development and encourage participants to keep an open mind towards change and new technologies.
- Partnership with “Todas Group,” a platform that aims to develop women's leadership.

#### ■ Diversity and Inclusion

- Diversity & Inclusion program which, in 2024 focused on the five pillars of Diversity and Inclusion: Gender, People with Disabilities, LGBTI+ People, Race/Ethnicity and Generations.

### 3. Other work-related rights

#### Domestic BU

#### ■ Data protection

- TIM Group privacy operating model: ensures the proper implementation of data protection regulations, developed according to the principle of privacy-by-design and subject to periodic improvements. It is based on the: transposition of legal provisions, that is, on the constant study and interpretation of regulations; clear definition of roles and responsibilities regarding personal data processing compliance; provision of information to various categories of data subjects (e.g., employees/workers) on the processing of their personal data; assessment of the risk associated with processing activities, recorded in the appropriate Registries (under the GDPR); taking of appropriate technical and organizational measures to ensure an adequate level of security.

#### TIM S.A.

- TIM S.A. invests in and promotes various actions aligned with global cybersecurity practices and in compliance with the General Data Protection Law (LGPD), no. 13.709/2018. In addition, TIM S.A. has been ISO 27001 certified since 2022. The main actions of the information security team include: appointment of the figure of the Data Protection Officer (DPO); creation of the Data Protection Committee; employee training, review of internal regulatory documents, hiring of a digital tool to assist and manage Holder's Rights, creation of the Privacy Center on TIM's website, among others.

[37], [MDR-A, 68 d]: Within the context of **IT security**, in 2024, there were no security incidents that had the characteristics of a “material event”, with the corresponding reporting obligation in accordance with the relevant company process. There was only one incident with a medium impact, caused by a DDOS attack characterized by unusual attack methods; this was promptly mitigated with the implementation of appropriate countermeasures designed to prevent similar situations in the future, or mitigate these before they generate significant impacts. Only two incidents (caused by process or system vulnerabilities but which in any case had a low impact) out of a total of 8,265 were worth reporting.

[38 a,b], [39], [43]: With regard to the material impacts identified for the Group's own workforce, the following actions are implemented or planned to mitigate or prevent any significant negative impacts on the Group's own workforce:

- To prevent or mitigate the negative impact “Potential cyber security threats may result in the leakage of sensitive customer and/or employee data”, the enterprise identifies the necessary and appropriate actions to deal with it as part of the Cyber Security process that ensures the logical security and protection of IT

and infrastructure resources, ICT assets as well as information. A central role is also played by the Data Protection Officer (DPO) of TIM and TIM Group companies, with advisory, training, informational, and oversight functions in compliance with the GDPR. DPO activities include, among others: the management of issues with the Data Protection Authority; specialized support to Corporate Functions and Group Companies for the proper processing of personal data; the provision of opinions to assess the risk to the rights and freedoms of the people concerned; the coordination of obligations relating to the management of data breaches. TIM assesses the effectiveness of actions through the DPO who informs and advises the organization and its employees about their data protection obligations under the GDPR and monitors the organization's compliance with the Regulation and internal data protection policies and procedures. To manage the impact, TIM employs 82 FTE (full-time equivalent) staff.

- To prevent or mitigate the negative impact of "insufficient safety measures, lack of training and inadequate protective equipment, which can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain", TIM takes the following actions (see MDR-A 68 a, b, c, d).

#### Domestic BU

- Adoption of Safety Management Model according to the UNI ISO 45001 standard for all processes related to offices and mixed-use buildings.
- Establishment of the Safety Steering Committee, chaired by the Chief Executive Officer, to ensure compliance of the Management System with relevant standards, foster integration among business functions and share improvement measures.
- Information, awareness and training campaigns for all staff.
- Implementation of an "identity card" for each employee indicating the risk profile of the work task and the information needed to perform the task safely. For employees at risk, personal protective equipment and protocols to be followed are also indicated. Information is available on the corporate intranet.
- Internal reporting channel for facility managers, related to Health, Safety and Environment, in implementation of the "Employer's Delegation of Powers in Occupational Safety and Health and Environmental Protection" Regulations.
- Computerized warning system to report hazards.

TIM monitors and evaluates the effectiveness of actions through the Safety Steering Committee, chaired by the CEO, which ensures that the Management System complies with relevant standards; promotes integration between different business functions; shares improvement measures.

To manage the impact TIM allocates significant resources to the following areas: safety training, with mandatory courses and periodic updates on emergency procedures, use of Personal Protective Equipment and risk management; supervision and implementation of security measures with a team of 27 experts; monitoring and collecting feedback from employees to improve security policies and practices.

#### TIM S. A.

- Implementation of the "Safety and health at work" Policy, which includes: prevention of accidents at work and protection of health; compliance with legal and other requirements of the organization; continuous improvement of the management system to increase safety and health performance.
- Occupational safety and health management system with essential processes and initiatives to maintain a healthy environment for all. The main aspects of this system are: legal compliance and other requirements; risk management; training, education and outreach; safety, health and emergency programs; prevention and mitigation of accidents and incidents; and process of continuous improvement.
- To prevent or mitigate the following negative impacts:
  - "An inadequate incentive system can have an effect on employee satisfaction".
  - "The absence of equal pay at executive, managerial, and employee levels may require corrective action to encourage the attraction of talent".

The TIM Group adopts compensation policies aimed at remunerating the entire corporate population appropriately as described in MDR-A 68 a, b, c, section "Adequate wages, also providing for specific indicators in managerial incentive systems", which are monitored periodically, to assess the effectiveness of actions. Management requires dedicated economic budgets to foster fair pay.

- To prevent or mitigate the negative impact of "Inadequate development, inclusion and work-life balance initiatives can affect employee satisfaction," TIM has consolidated over the years a very rich welfare plan aimed at the physical, psychological and social well-being of employees and their families, with a view to creating a good corporate climate, which also has a positive impact on productivity and attendance.

#### Domestic BU

TIM's **welfare plan** in 2024 has seven strands:

- **Personal Services** that include: partnership with WellHub for free or discounted services for physical exercise; psychological service offering 8 free online psychotherapy sessions (used by over 200 colleagues in 2024); mindfulness and autogenic training courses; courses on prevention on certain categories of diseases and programs on healthy lifestyles.

- **Family Services** including: "TIM Summer", 2-week summer vacation for employees' minor children (1,194 participants in 2024); "TIM Study", study Assistance and School and Academic Guidance Programs (485 enrolled in 2024) and Interculture Scholarships (8 scholarships); "TIM Care", caregiver employee program with guidance and caregiver/baby-sitter search; "TIM Childhood", the service that provides financial support for expenses incurred for nursery, childcare or baby-sitting services (for the 2023/2024 school year, there were 594 beneficiaries).
- **Merit and Justice** includes programs to develop the talent and performance of all employees with specific focus on bridging the gender gap and specific attention to the younger generation (see section [37] [MDR-A, 68 a, b, c, e] "Training and development").
- **Health:** discounted health insurance policies, care, check-ups, free vaccination campaigns. TIM My Health, the free medical care policy for all employees with emergency care for the family, 24/7 medical support available, prescription issuance and home medication delivery; Free check-up for everyone over 45 every 2 years (about 5,000 invited in 2024) and Flu Vaccination Campaign: Total refund, with over 300 participants; Insurance that provides health benefits supplementary to those of the National Health Service.
- **Economic support:** company smartphones and SIMs with mixed use; Flexible and Fringe Benefits platform, which enables employees to convert their performance bonuses into welfare services, taking advantage of tax breaks; financial education programs, attended by more than 1,000 people; More than 300 deals offering favorable conditions for employees.
- **Well Working:** tools and solutions to help employees work to the best of their ability, from IT equipment to mobility tools (such as shuttles or car sharing), to flexibility tools and special permissions (such as those relating to flexible working).
- **Equal Opportunities:** programs and training to promote inclusion of people with disabilities and LGBT+, to combat gender-based harassment, and to incentivize shared parenting by doubling mandatory paternity leave. In 2024, awareness programs on harassment and bullying (over 90% participation) and equal gender opportunity (31% participation) were delivered. The plan includes a dedicated Steering Committee, a dashboard of KPIs according to PDR:125, a policy on harassment and bullying, and gender equality awareness activities. Furthermore, the Disability Management plan is based on an innovative policy for special equipment.

The company monitors and evaluates the effectiveness of all actions taken through the Climate Survey and the Welfare, Training and Development Survey. To manage the impact TIM provides 9 people and a budget of about €6,000k.

#### TIM S.A.

TIM S.A.'s **healthcare plan** in 2024 includes several initiatives to promote development and inclusion programs and work-life balance, including:

- **Well+Being program** to improve the well-being of employees and their families.
  - **Social Service and Personal Support:** the objective is to provide support in delicate social situations that require acceptance and proper guidance. This service is offered to all employees and their respective legal dependents through social, legal, financial, and psychological guidance, in a confidential and discreet manner, 24 hours a day, seven days a week, via telephone or e-mail.
  - **Reconnecting with TIM:** offers a welcome and, if necessary, specific psychosocial support for people returning from maternity leave, as well as mentoring and professional development courses, and support and awareness groups for leaders.
- To prevent or mitigate the negative impact, "A working environment that does not provide employees with the 'right to disconnect' results in increased work stress and burnout, with consequences for employee well-being" the following actions are planned:

#### Domestic BU

TIM has included measures to promote well-being and work-life balance in the **Agile working agreement**. These measures include "good virtual coexistence" behaviors such as using the "late delivery" option, scheduling meetings around work hours, and managing your schedule well. Disconnection arrangements are based on individual responsibility, with no automatic mechanisms, and during authorized breaks (e.g., lunch breaks) workers are not required to receive or view company communications. This right is further referred to in the individual agreements of workers who have voluntarily joined the flexible working scheme. The company monitors and evaluates the effectiveness through dialogue with the trade union representatives and any legal proceedings. To manage the impact, the company provides: training for employees and managers on the importance of the right to disconnect and stress management techniques; psychological support; for the promotion of company policies that foster respect for the right to disconnect.

#### TIM S.A.

- "Modo Você" campaign, active throughout the year to encourage offline leisure time and improve employees' health and self-esteem.
- Specific program for pregnant women: program dedicated to pregnant women and extends up to 12 months of the child's life, offering comprehensive support through telemonitoring and providing assistance on any topic related to pregnancy, puerperium and the first year of the child's life, always with a focus on prevention and physical and psychological well-being.

**[38 c, d], [43]:** In relation to the positive impact of *“a flexible organizational environment that promotes the well-being of employees and their families, which can generate benefits in terms of work-life balance”*, in the Domestic Area, TIM implements a variety of measures that help employees to better manage family and personal responsibilities, including:

- Agile work, according to current agreements and with specific arrangements for employees with special conditions;
- leaves and permits, according to different personal, family and study needs;
- additional tools for flexibility in the performance of work such as flexible entry for normal staff and management of delays for shift workers.

To manage the impact, TIM has a team dedicated to the implementation and monitoring of labor policies; training programs; Develops and manages the flexible work platform.

- In relation to the positive impact *“Digital Transformation Training and Reskilling Programs Generate New Skills to Support the Jobs of the Future,”* in 2024 TIM offered training and reskilling courses by delivering 280,000 hours of digital transformation training to a cluster of 14,400 employees of major companies in Domestic perimeter<sup>20</sup>. The effectiveness of the training activity is measured through a post-course questionnaire in order to verify content learning. These training programs engaged a team of 11 people, and involved a total expenditure of €1,300k.
- In relation to the positive impact *“Employee engagement leads to growth in leadership skills and professional development, improving job satisfaction”*, in the Domestic area, TIM has implemented several actions, described in paragraph 38 a, the effectiveness of which it monitors and evaluates both through the climate survey, which explores various aspects of the Employee Journey, including work-life balance issues, and through a specific survey of welfare, training and development activities. To manage the impact TIM employed a team of 9 people and a budget of about €6,000 k.

**[40 a]:** In relation to the material risks identified for the Group’s own workforce, below are the actions taken or planned to mitigate or prevent the material effects on the Group’s own workforce.

- Regarding the risk of *“Phenomena of human rights violations in the company and along the supply chain that may lead to legal liability and consequent reputational damage,”* the TIM Group implements monitoring actions so that policies, procedures and regulations, as well as the values of the Code of Ethics and Conduct, are respected. Reporting systems through the whistleblowing portal and sanctions for violations are provided. Since 2020, a policy for handling incidents of gender, sexual, and bullying harassment has been in place, including a dedicated channel in the Whistleblowing portal, a harassment committee in the Human Resources Department, and support tools for victims such as the psychological service, legal assistance, and the Person of Trust scheme.
- Regarding the risk *“Unauthorized access to personal data of customers or employees may result in legal liability, regulatory sanctions, economic-financial and reputational damage,”* the TIM Group has implemented security policies and procedures to protect employees’ personal data, preventing unauthorized access and unlawful processing. In the Domestic area, the relevant business departments, such as the Chief IT Group Office and the Chief Public Affairs, Security and International Business Office, are responsible for implementing preventive and corrective measures to mitigate cyber threats. The company has a specific procedure for handling data breaches in accordance with the GDPR. The control system on privacy compliance includes periodic self-assessments, spot checks, and second-level checks planned by the Compliance Department in collaboration with the Data Protection Officer (DPO).
- Regarding the risk *“Gender inequalities in terms of pay and positions of responsibility and non-transparent career paths can have consequences on the attraction and retention of talent”*, the TIM Group oversees the development of career paths through: retention plans aimed at retaining their employees and reducing turnover; specific tools such as replacement boards, which plan and manage the future of key positions within the organization.

**[40 b]:** Related to the relevant opportunities identified for the Group’s own workforce below are the actions taken or planned to strengthen the effects on the Group’s own workforce.

- To pursue the opportunity *“Flexible and hybrid working models, which can improve employee productivity and well-being, while reducing operating costs”*, in the Domestic area, the Company adopts the flexible working model to improve employee productivity and well-being while reducing operating costs. This approach optimizes work organization, improves work-life balance and employee personal satisfaction, and also helps reduce CO<sub>2</sub> emissions.

To pursue the following opportunities:

- *“The enhancement of employer branding along with the provision of professional refresher programs and talent management strategies can help attract and maintain a highly qualified and diverse workforce”.*
- *“The establishment of achievable performance objectives for employees promotes company productivity”.*

TIM creates collective and individual pathways to enhance people’s talent and employability. The Human Resources & Organization Department, in collaboration with each person’s line manager, establishes growth plans based on assessments to identify areas for improvement. Actions include training, coaching, mentoring, special projects and networking, in line with the company’s medium- and long-term strategic goals. Incentive systems include challenging and sustainable goals to improve business productivity.

<sup>20</sup> The persons hired belong to the companies TIM S.p.A., Noovle S.p.A. TI Sparkle S.p.A. Olivetti S.p.A, Telecontact Center S.p.A, Telsy S.p.A., TI Trust Technologies S.R.L., TIM RETAIL, TI San Marino, TIM Sparkle Estero

[41]: TIM ensures that its practices do not cause or contribute to causing significant negative impacts on its workforce, engaging in constant dialogue through corporate climate analyses, monitoring of voluntary participation in flexible working, the presence during delivery of training of modules dedicated to health and safety, as well surveys to glean feedback regarding these.

The Company has not identified any negative impacts on its own workforce deriving from the transition to a greener and more climate-neutral economy.

## Metrics and targets

### Disclosure Requirement S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

[46], [MDR-T, 80 a, b, c, d, e, f, g, h, i]: TIM, in its new Plan 2025-27, has identified the following Group targets:

1. **Leadership position:** % women 35,5 % by 2027
2. **Hiring:** % women 50% by 2027

The "Women in Leadership Position" target is given by the ratio of the total number of women in leadership positions to the total number of leadership positions in the Company and formalized by the Human Resources & Organization functions of the Group Companies. The target includes positions held by executive and non-executive officers (managers and directors).

The "Hiring" target is given by the ratio of total female hires to total hires in the Company. Recruitment refers to both permanent and temporary staff.

Through these long-term targets, the progress of which is monitored periodically, the Group confirmed its commitment to creating a work environment that values skills and merit, ensuring fairness and integrity as fundamental principles for growth.

Targets are expressed as relative objectives with respect to an initial reference point, represented by the base year 2024; they concern the entire TIM Group (for details on the reporting scope, please refer to the BP-1 Disclosure Requirement) and include only own activities.

Intermediate targets are provided for both targets. Specifically, the following values are provided for target 1): 34.5% in 2025; 35% in 2026. Target 2) provides the following values: 49% in 2025; 49.5% in 2026.

The defined targets are consistent with national, European and international sustainable development goals, embodying UN SDG Goal 5, which promotes gender equality and empowerment of all women as a basic human right. Targets are not based on firm scientific data.

In defining the Group's target, own workers were involved through the double materiality process, which identified material impacts, risks and opportunities and helped to outline the plan targets.

The methodology adopted to define target 1) has not changed from the previous year, but the redefinition of the organizational scope following the spin-off operation makes it impossible to compare the data shown in sustainability statements prior to 2024. Instead, target 2) was introduced with the new Plan 2025-2027.

[46], [MDR-T, 80 j]: In 2023, TIM formed the **Gender Equality Steering Committee** to adopt and implement gender equality and monitor the progress of ESG Plan targets. TIM has also obtained Gender Equality Certification (UNI/PdR 125:2022) of the organization's compliance with the gender equality management system. Progress is in line with what was initially planned, and the Company is adopting behaviors and actions that will support the achievement of the target.

[MDR-T, 81 b i, ii]: In addition to the targets set in the business plan, the TIM Group, in order to monitor the effectiveness of policies and actions related to material impacts, risks and opportunities on its own workforce, adopts monitoring processes in accordance with regulations and in line with best practices, based on performance measurement systems. Specifically, the Company:

- with reference to health and safety aspects, monitors progress regarding the number of injuries;
- with reference to aspects concerning the adequacy of wages, the company monitors whether the salary received by all employees is in line with applicable reference parameters;
- with reference to diversity aspects, monitors the gender distribution by occupational and age groups within the corporate population;
- with reference to aspects related to the work-life balance, monitors the percentage of employees entitled to take leave for family reasons and those who have subsequently taken it;
- with reference to aspects related to training and skill development, monitors the percentage of employees who have participated in regular performance and career development reviews and the average number of hours of training given to its employees;
- with reference to aspects related to equal pay, monitors progress on the gender pay gap.



[47 a, b, c]: The ESG objectives present in the corporate strategic plan are defined through the involvement of relevant functions. Specifically, for the two gender equality targets, the Corporate Communication & Sustainability Department worked jointly with the Human Resources & Organization Department to present them to the CEO.

Targets are monitored periodically, including through the adoption of a digital platform that tracks all ESG data.

Thanks to the monitoring activities and numerous initiatives implemented by the company, a continual improvement in performance can be noted, for the benefit of employees.

## Disclosure Requirement S1-6 - Characteristics of the undertaking's employees

### [50 a] Employees by gender - TIM Group

	UOM	2024				
		Women	Men	Other	Not reported	Total
<b>Total employees - at the end of the period (head count)</b>	<b>n</b>	<b>13,181</b>	<b>13,643</b>	—	—	<b>26,824</b>
Employee breakdown by gender - at the end of the period	%	49.14	50.86	—	—	<b>100.00</b>
<b>Total employees - period average (head count)</b>	<b>n</b>	<b>13,280</b>	<b>13,797</b>	—	—	<b>27,077</b>
Employee breakdown by gender - period average	%	49.04	50.96	—	—	<b>100.00</b>

### [50 a] Employees by country

	Total employees at the end of the period	Total employees period average
Italy	17,458	17,683
Brazil	9,123	9,152

[MDR-M, 77 a]: The view of employees by country takes into account only those countries where Group companies have 50 or more employees and account for at least 10% of the Group's total number of employees. Included in "Italy" are: TIM S.p.A., TIM Sparkle Italia, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies, TS Way, QTI S.r.l., Mindicity. In "Brazil" only TIM S.A. is considered.

### [50 b] Employees by type of contract and gender - end of period - TIM Group

	UOM	2024				
		Women	Men	Other	Not reported	Total
<b>Total employees</b>	<b>n</b>	<b>13,181</b>	<b>13,643</b>	—	—	<b>26,824</b>
Permanent employees	n	13,090	13,533	—	—	<b>26,623</b>
Fixed-term employees	n	91	110	—	—	<b>201</b>
Non-guaranteed hours employees	n	0	0	—	—	—

### [50 b] Employees by type of contract and gender - period average - TIM Group

	UOM	2024				
		Women	Men	Other	Not reported	Total
<b>Total employees</b>	<b>n</b>	<b>13,280</b>	<b>13,797</b>	—	—	<b>27,077</b>
Permanent employees	n	13,177	13,721	—	—	<b>26,899</b>
Fixed-term employees	n	102	76	—	—	<b>178</b>
Non-guaranteed hours employees	n	0	0	—	—	—

## [50 c] Employee turnover - TIM Group

	UOM	2024				Total
		Women	Men	Other	Not reported	
<b>Total employees</b>	<b>n</b>	<b>13,181</b>	<b>13,643</b>	—	—	<b>26,824</b>
Employees who have left the company	n	1,357	1,582	—	—	2,939
Employee turnover rate	%	10.30	11.60	—	—	10.96

**[MDR-M, 77 a]:** The turnover rate is calculated as the ratio of the number of employees terminated during the reporting year to the total number of employees at the end of the reporting period. Employees who have terminated employment due to retirement, incentive termination, spontaneous resignation, layoff, and death in service are considered.

**[50 d i, ii], [MDR-M, 77 a]:** Data on employee stocks for TIM S.p.A., Telsy, Telecontact, TI Sparkle, TI Trust Technologies, Olivetti, and Noovle were extracted from the Group's IT systems, while for other Group companies they were provided directly.

Data are expressed in whole heads, do not consider administered employees, and are extracted at the end of the period (2024).

From the company's systems it is possible to directly calculate the average consistencies of permanent and fixed-term employees, as well as the average male/female consistencies at the total level. However, the male/female mix by contract type is not available. Therefore, to calculate the average male/female size by contract type, the male/female proportion of the total was applied to the average fixed-term and permanent size.

**[50 e]:** Changes in the average number of employees are affected by terminations and hires that occurred during the year. Terminations are mainly linked to spontaneous resignations and to resignations with financial bonuses. The impact of temporary contracts is minimal in the TIM Group and is mainly associated with the management of business volumes regarding TIM Retail stores.

**[50 f]:** The figure on the number of employees is also shown in Consolidated Financial Statements in the "Detailed Tables - Consolidated Data" section of the report on operations. The figures differs by 63 in the consistency of the head-counts at the end of the period because the number administered is also counted in the financial statement.

For information on NetCo, please refer to the section "Information on NetCo's Performance", Disclosure Requirement S1-6 "Characteristics of Company Employees".

## Disclosure Requirement S1-8 Collective bargaining coverage and social dialogue

### [60 a] Employees covered by collective agreements - TIM Group

	UOM	2024
<b>Total employees</b>	<b>n</b>	<b>26,824</b>
Employees covered by collective bargaining agreements <sup>21</sup>	n	26,824
	%	100.00

**[MDR-M, 77 a], [60 b]:** Within the European Economic Area (EEA), the Group applies specific types of National Collective Bargaining Agreements (CCNL) based on the professional category:

**Executive employees:** this category is covered by two types of contracts that concern 100% of the executives of the Group's Italian companies.

The same CCNL is applied to Executive personnel In each company, as indicated below:

- National Collective Bargaining Agreement for Executives of Companies Producing Goods and Services (CCNL Industrial Executives), applied to 272 people out of the total number of companies in the perimeter
- National Collective Bargaining Agreement for Executives of sector tertiary, distribution and service companies, applied to 2 people in total

**White-collar and middle manager employees:** these categories are covered by two types of contracts that concern 100% of the personnel of the Group's Italian companies.

The same CCNL is applied to white collars and middle managers in each company, as indicated below:

- National Collective Bargaining Agreement for personnel employed by companies operating Telecommunication Services (CCNL TLC), which covers 16,089 people in total, including White collars and Middle Managers

<sup>21</sup> All TIM Group employees are covered by specific contractual agreements, depending on the legislation in each country in which it operates.



- National Collective Bargaining Agreement for employees of Tertiary Sector, Distribution and Service companies, which covers 1,095 people in total between White Collars and Middle Managers

[60 c]: The percentage of own employees covered by collective agreements, in Group companies operating outside the EEA, is 100%.

#### [63 a] Employees covered by employee representatives - TIM companies in EEA countries.

	UOM	2024
<b>Total employees</b>	<b>n</b>	<b>17,458</b>
Employees covered by employee representatives	n	17,115
	%	98.04

[MDR-M, 77 a]: The total number of employees in the table refers to companies operating in the countries of the European Economic Area with at least 50 employees and representing at least 10% of the total number of employees of the Group. The companies considered are: TIM S.p.A., TIM Sparkle Italia, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telsy S.p.A., TIM Retail S.r.l., TI Trust Technologies, TS Way, QTI S.r.l., Mindicity.

[63 b]: The Group's companies operating in the European Economic Area have not entered into any agreement with their employees for representation by a European Works Council (CAE), a works council of a European Company (SE) or a works council of a European Cooperative Company (SCE).

#### [RA 70] Coverage of collective bargaining and social dialogue

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees - EEA (for countries with > 50 empl. representing > 10% total employees)	Employees - non-EEA (estimate for regions with >50 empl. representing >10% total employees)	Workplace representation (only EEA) for countries with > 50 empl. representing > 10% total employees)
0-19%	—	—	—
20-39%	—	—	—
40-59%	—	—	—
60-79%	—	—	—
80-100%	Italy	Brazil	Italy

### Disclosure requirement S1-9 - Diversity metrics

#### [66 a] Distribution of employees by gender at Top management level - TIM Group.

	UOM	2024				
		Women	Men	Other	Not reported	Total
<b>Total employees at Top management level</b>	<b>n</b>	<b>3</b>	<b>14</b>	<b>—</b>	<b>—</b>	<b>17</b>
Gender distribution at senior management level	%	17.65	82.35	—	—	100.00

[MDR-M, 77 a]: The TIM group defines “**Top Management**” as people who play a key role in the development of business strategies and who report directly to the Management and Control bodies or to the Group's Chief Executive Officer. Top management is shown on the first page of the company's organizational chart, called "Organizational Macro Chart."

# Macro organizational structure as of 12/31/2024



#### [66 b] Employee distribution by age group - TIM Group

	UOM	2024				
		Women	Men	Other	Not reported	Total
Total employees	n	13,181	13,643	—	—	26,824
Employees under 30 years old	n	995	1,012	—	—	2,007
	%	7.55	7.42	—	—	7.48
Employees between the ages of 30 and 50	n	7,173	6,135	—	—	13,308
	%	54.42	44.97	—	—	49.61
Employees over the age of 50	n	5,013	6,496	—	—	11,509
	%	38.03	47.61	—	—	42.91

[MDR-M, 77 a]: In this table, the percentage of employees by age group is calculated by relating the number of employees by age group and gender to the total number of employees by gender.

#### [66 b] Percentage distribution of employees by age group - TIM Group

	UOM	2024				
		Women	Men	Other	Not reported	Total
Percentage of employees under 30	%	3.71	3.77	—	—	7.48
Percentage of employees between 30 and 50 years old	%	26.74	22.87	—	—	49.61
old	%	18.69	24.22	—	—	42.91

[MDR-M, 77 a]: This table shows the percentage of employees by age group and gender, out of the total number of employees.

For information on NetCo, please refer to the section “Information on NetCo’s Performance”, Disclosure Requirement S1-9 “Diversity Metrics”.

### Disclosure Requirement S1-10 - Adequate Wages.

[69]: All employees in the TIM Group receive an appropriate salary in line with the relevant national collective bargaining agreements, (see what is stated in Disclosure Requirement S1-8 paragraph 60 a).

#### [70] Employees who do not receive wages in line with applicable benchmarks.

	%
Italy	0.00
Brazil	0.00

[MDR-M, 77 a]: The country perimeter takes into account only those countries where the company has 50 or more employees representing at least 10% of the Group’s total number of employees. Included in “Italy” are: TIM S.p.A., TIM Sparkle Italia, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A, Telsy S.p.A., TIM Retail S.r.l, TI Trust Technologies, TS Way, QTI S.r.l., Mindicity. In “Brazil” only TIM S.A. is considered.

### Disclosure requirement S1-12 - Persons with disabilities.

#### [79] Employees with disabilities - TIM Group

	UOM	2024
Total employees	n	26,824
Employees with disabilities	n	995
	%	3.71

[MDR-M, 77 a]: The TIM Group, in classifying employees having “disabilities”, aligns itself with the laws of the countries in which it operates.

For Italian companies, employees that come under the categories described in Article 1 of Law 68 of March 12, 1999 ‘Rules for the right to work of people with disabilities’ are considered as having ‘disabilities’.

More generally, the “condition of disability” as per the provisions of Legislative Decree 62/2024 is defined as “a lasting physical, mental, intellectual, neurodevelopmental or sensory impairment that, in interaction with barriers of a different nature, may hinder full and effective participation in different life contexts on the basis of equality with others”.

In Brazil, federal law defines a person with a disability if he or she has a permanent and irreversible impairment of a physical, or hearing, or visual or intellectual/mental, or multiple nature, or an infirmity recognized by the health welfare service. When it interacts with one or more barriers, this deficit hinders its full and effective participation in society on a par with others. The process of classifying a person as a "PCD" (Person with Disability) also involves a detailed medical evaluation. First, the health department reviews the person's International Classification of Diseases (CID), a system used to classify diseases and health conditions. The assessment then confirms whether the individual has a disability that falls within the casuistry of the above law, ensuring the permanence and irreversibility of the deficit.

## Disclosure requirement S1-13 - Training and skill development metrics

### [83 a] Training and skills development by gender - TIM Group

	UOM	2024				Total
		Women	Men	Other	Not reported	
Employees that participated in regular performance and career development reviews	n	10,434	10,264	—	—	20,698
	%	38.90	38.26	—	—	77.16

[MDR-M, 77 a]: The percentage of employees who have participated in periodic performance and career development reviews is given by the ratio of the number of employees who have participated in such reviews to the total number of employees in the Group, by gender and at total, set forth in Disclosure Requirement S1-6 "Characteristics of the undertaking's employees."

### [83 b] Hours of training by gender - TIM Group

	UOM	2024				Total
		Women	Men	Other	Not reported	
Total training hours	h	482,628.26	396,292.78	—	—	878,921.04
Average hours of training per employee	h	36.62	29.05	—	—	32.77

[MDR-M, 77 a]: Average hours of training are the result of the ratio of the total number of training hours offered and completed by employees by gender in the reporting year to the total number of Group employees by gender as of 12/31/2024, as per Disclosure Requirement S1-6 "Characteristics of the undertaking's employees."

## Disclosure Requirement S1-14 - Health and Safety Metrics

### [88 a] Workers covered by the health and safety management system - TIM Group

	UOM	2024		Total
		Employees	Non-employees	
Own workers covered by the health and safety management system	n	26,634	—	26,634
	%	99.29	—	99.29

[MDR-M, 77 a]: The percentage of workers covered by the health and safety management system refers to the total own workforce.

### [88 b] Fatalities from work-related injuries and illnesses - TIM Group

	UOM	2024			Total
		Employees	Non-employees	Other workers	
Fatalities from work-related injuries and illnesses	n	0	—	—	0

It should be noted that in Brazil, in 2024, there was a death of a worker in the TIM S.A. value chain in the course of carrying out some technical activities pertaining to company assets.

### [88 c] Recordable Workplace Injuries - TIM Group

	UOM	2024	
		Employees	Non-employees
Recordable work-related accidents	n	25	—
Rate of recordable work-related accidents	%	0.6	—
			Total
			25
			0.6

[MDR-M, 77 a]: The number of recordable occupational injuries corresponds to the recorded injuries that resulted in at least one day off work. The figure does not include injuries caused by passive accidents.

The work injury rate is calculated as the ratio of the number of recorded work injuries to the total hours worked in the year (given by the sum of hours worked, overtime hours, training hours and travel hours), which is 39,850,276, multiplied by 1,000,000.

### [88 d, e] Cases and days lost due to occupational injuries, accidents and deaths - TIM Group

	UOM	2024
Recordable cases of work-related illness	n	0
Work days lost due to work-related injuries and fatalities due to work-related injuries and illnesses and fatalities due to illnesses	n	367

[MDR-M, 77 a]: Days lost due to injury do not consider days not worked for commuting accidents, unless transportation was arranged by the Company, or for injuries caused by passive accidents. In the case of an injury with absences spanning two reporting years, the injury is recorded in the year in which it occurs, while the days of absence are counted in the year in which they are actually used.

For information on NetCo, please refer to the section “Information on NetCo’s Performance”, Disclosure Requirement S1-14 “Health and Safety Metrics”.

## Disclosure requirement S1-15 - Work-life balance metrics

### [93 a] Employees entitled to family-related leave - TIM Group

	UOM	2024			
		Women	Men	Other	Not reported
Total employees	n	13,181	13,643	—	—
Employees entitled to take family-related leave	n	13,181	13,643	—	—
	%	100.00	100.00	—	—
					Total
					26,824
					26,824
					100.00

### [93 b] Employees who have taken family-related leave - TIM Group

	UOM	2024			
		Women	Men	Other	Not reported
Total employees	n	13,181	13,643	—	—
Employees who have taken family leave	n	2,020	1,083	—	—
	%	15.33	7.94	—	—
					Total
					26,824
					3,103
					11.56

[MDR-M, 77 a]: The data in the table refer to the number of employees who took family-related leave at least once during the reporting year.

[94]: All Group employees are entitled to family leave as provided for in the applicable collective bargaining agreements (for collective bargaining coverage see ESRS Disclosure Requirement S1-8 “Collective Bargaining Coverage and Social Dialogue”).

## Disclosure requirement S1-16 - Remuneration metrics (pay gap and total remuneration)

[97 a], [MDR-M, 77 a]: The TIM Group has a **gender pay gap between men and women of 24.41%**, of which 19.8% at the Domestic level.

These figures are influenced by the strong concentration of women in the Customer Care sector (about 80% of Caring operators are women), where there is the highest incidence of the lowest job classifications than in other functions of the Group, in view of the tasks performed.

TIM S.A takes into account gender representation at the professional and geographical levels in its reports.

The gender pay gap, net of the Customer Care sector is 18.6% at the Group level, while at the Domestic level it drops to 13.6%.

TIM S.A, moreover, in its report measures a Gender Pay Gap of 1.8 percent, which weights in Brazil the female representation on professional profiles with very low pay and the wage disparity that is recorded at the level of states/regions of the federation.

The calculation of the pay gap is in line with the methodology stipulated in the CSRD regulations.

**[97 b, c]:** At the Group level, the ratio of the annual total remuneration of the highest paid person to the median annual total remuneration of all employees is 92.86.

In the calculation of the ratio, fixed and variable remuneration are considered (the latter at the target value, as official company kpi summaries are not yet available), and non-monetary benefits (mixed-use car, life insurance, meal vouchers), which represent an absolutely minor part of remuneration, in the order of a few percentage points, are not considered. Variable compensation concerns the entire company population in the form of managerial (MBO, Management by Objectives), commercial (PIV, Sales Incentive Plans) and collective (PdR, Results Bonus) incentives, as well as specific collective incentive tools (Canvass) for specific professional positions, usually in contact with Customers. The calculation of the median value of remuneration at the Group level was approximated through a calculation algorithm that considers the weighted average over the number of employees of the median values of each Group Company.

## **Disclosure Requirement S1-17 - Incidents, complaints and severe human rights impacts**

**[MDR-M, 77 a], [103 a, b, c, d]:** During 2024, the TIM Group through the Whistleblowing channel received 43 total reports regarding Human Rights, of which 30 were related to discrimination/harassment aspects and 13 related to other issues.

With respect to the 30 reports of discrimination/harassment incidents, 3 were substantiated, 1 partially substantiated, 4 unfounded, 6 inconclusive, 7 inadmissible, 6 closed as unassessable, and 3 with further investigation in progress. Corrective actions put in place by the company resulted in 7 layoffs, one disciplinary action and 3 pieces of feedback.

Of the 13 reports attributable to other issues, 9 were found to be unsubstantiated, 2 inconclusive, and 2 with ongoing investigations.

The TIM Group did not pay fines or penalties for compensation for damages resulting from complaints and incidents related to episodes of harassment and human rights' violations.

It is specified that in order to track reports of discrimination cases, the TIM Group refers to the definition given in the ESRS.

**[104 a, b]:** During 2024, the TIM Group did not record any reports regarding serious human rights violations related to its workforce, which can be traced to the cases listed in the ESRS.

## Workers in the value chain [ESRS S2]

### S2-Strategy

#### Disclosure Requirement SBM-2 - Interests and views of stakeholders

[S2 SBM-2, 9]: In defining its business strategy, workers in the value chain could be materially impacted by TIM regarding policies and certifications to be adopted and obtained. To avoid this, the Group interfaces with workers in the value chain, including through the Open-es platform, to ensure that its business model is in line with the needs of relevant stakeholders.

#### Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model

[S2 SBM-3, 10 a, b], [S2 SBM-3, 11]: In the double materiality analysis, the TIM Group considered all potentially impacted workers, both internal and in the value chain. Impacts arise from the business model and corporate strategy. TIM uses a complex supply chain that includes network operators, ICT service providers, manufacturing companies, and outsourcing partners. This pattern affects working conditions, safety, and human rights, especially in countries at risk of fundamental rights violations.

The assessment of social impacts in the value chain guides TIM's strategic decisions toward a sustainable business model, while also managing reputational risks arising from inadequate management of working conditions in suppliers.

[S2 SBM-3, 11 a, i, ii, iii]: Within the value chain, the TIM Group considers as relevant in terms of impact mainly the workers upstream of the supply chain, that is the employees of the suppliers that offer the TIM Group products and services, such as network services (Fibercop), components for telecommunications and devices, or programming services, as material in terms of impact. Within the offices of the TIM Group, it is expected that there will be workers who are not part of their own workforce, such as workers in technical assistance services companies, and providers of professional services (such as, for example, consulting firms).

With regard to workers downstream of the value chain, the TIM Group mainly considers the workers of the companies that offer TIM logistics services, distributors and dealers, as well as the workers of companies that build and manage plants for customers.

There are workers who carry out operations as part of joint ventures with the Group. For example, in Italy, TIM is involved in a joint venture with TimFin S.p.A. and with the National Strategic Hub.

[S2 SBM-3, 11 a v], [S2 SBM-3, 11 c, d], [S2 SBM-3, 12]: The double materiality analysis highlighted a single negative impact in relation to workers in the value chain:

- *"Insufficient safety measures, lack of training and inadequate protective equipment can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain".*

The negative impact is generalized in nature, not being related to a specific incident encountered.

That said, generally speaking, among the value chain workers most likely to be negatively impacted may be women, young people, people with disabilities and supplier workers in at-risk geographic areas (Asia, Central and South America, North Africa and Eastern Europe).

Finally, the double materiality analysis showed no material positive impacts in relation to workers in the value chain.

[S2 SBM-3, 11 b, e], [S2 SBM-3, 13]: The double materiality analysis revealed the following risk:

- *"Phenomena of violation of human rights in the company and along the supply chain may result in legal liability and consequent reputational damage";*

The risk may involve specific groups of workers who work for suppliers operating in ESG-risk geographic areas such as Asia, Central and South America, North Africa, and Eastern Europe. In particular, the risk in these areas could involve child labor, forced labor or bonded labor.

For this reason, in so-called "ESG risk" areas, these suppliers are administered an ESG qualification questionnaire at the time of registration to check the company's compliance with certain standards, including respect for human rights.

Finally, the double materiality analysis showed no opportunities in relation to workers in the value chain.

### S2-Impact, risk and opportunity management

#### Disclosure requirement S2-1 - Policies related to value chain workers

[16], [IMDR-P, 65 a]: The aspects of the IROs that emerged as material from the double materiality assessment of the topic "Workers in the value chain" are covered in the "Human Rights Policy", in the "Product and Service Procurement Policy" and in the "TIM Health and Safety Policy". All policies link to the following material impact and risk:



## Negative impact

- *"Insufficient safety measures, lack of training and inadequate protective equipment can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain"*

## Risk

- *"Human rights violations within the company and along the supply chain may result in legal liability and consequent reputational damage"*

The "Human Rights Policy" aims to make respect for Human Rights an essential requirement in carrying out the Group's activities and also concerns third parties who enter into relationships with the company.

The Policy identifies Human Rights that may be influenced, directly or indirectly, by Group activities, including fundamental Human Rights (e.g., working hours, fair wages, minimum working age, workplace conditions) rights concerning health and safety, rights to protect diversity and discrimination.

In relation to the IROs material to the topic "Workers in the Value Chain", the protection of rights also concerns the human resources of Suppliers.

The policy also sets out the processes through which the company undertakes to respect human rights. Specifically, all activities within the scope of the policy are subject to periodic internal due diligence inspired by the Guiding Principles of the United Nations Global Compact, which aims to:

- identify and map the human rights risks arising from the Group's operational activities;
- confirm that each topic is governed by a specific internal regulatory framework (for example, policies, procedures), is monitored and tracked (where possible through appropriate indicators) and has had the related responsibilities assigned to it;
- establish a gradual improvement strategy which, beginning with simple compliance with local laws, steers human rights policies and processes towards engagement with the relevant stakeholders, through appropriate initiatives designed to engage them.

The "**Product and Service Procurement Policy**" defines the objectives and general principles of the TIM Group's purchasing process and the related regulatory, contractual and control guidelines, as well as the procurement commitments in terms of environmental and social responsibility.

With reference to the IROs material for "Workers in the value chain", the policy ensures compliance, throughout the supply chain, with the Group's ethical and sustainability values at all times, requiring a similar formal commitment from suppliers and promoting, through the latter (and any subcontractors), respect for lawfulness, human rights and the rights of the person, environmental sustainability, health and safety at work and the provisions of TIM's Anti-Corruption Management System.

To this end, supply contracts provide for TIM and TIM Group Companies to have the possibility to carry out controls and audits on suppliers and their performance, in compliance with the current regulatory and procedural framework.

The "**Health and Safety Policy**", drafted in accordance with UNI EN ISO 45001 provisions, aims to:

- foster the reduction of accidents, occupational diseases and other accidental events, through the implementation of appropriate prevention and control measures;
- ensure full compliance with legal requirements and mandatory safety requirements on the design, construction and management of buildings;
- guarantee the best living conditions for working environments and services for people;
- assess risks to the safety and health of workers, with a view to gradually eliminating these or reducing them to a minimum through the adoption of best practices.

In relation to the IROs material for the topic "Workers in the value chain", the document also sets out TIM's commitment to promoting a careful selection and management of contractors and suppliers, with the support of other responsible business functions, also concerning the adoption of best health and safety standards, promoting engagement with contractors and suppliers for the exchange and dissemination of good practices.

To contextualize the Group's policies in the Brazilian business dimension, TIM S.A. has also defined three additional policies related to the topic "Workers in the value chain" that concern:

- "**Supplier Relations**", in which it requires from its suppliers, including subcontractors, and encourages respect for the principles relating to child and forced labor, health and safety, freedom of association, discrimination and harassment, disciplinary procedures, enhancement of diversity, working hours and salaries.
- The "**Social Responsibility Policy**", in which TIM S.A. confirms its commitments to national and international standards and principles to defend human rights, decent work practices, protect the environment and combat corruption.
- The "**Health and Safety in the Workplace**" Policy applied to all TIM Group facilities in Brazil, including the TIM Institute, which establishes guidelines and principles to be applied in all activities, with the aim of promoting the continuous improvement of working conditions. The policy includes key commitments also aimed at workers of service providers in relation; to the prevention of accidents at work and protection of health; to compliance with legal and other requirements of the organization; to continuous improvement of the management system, with the aim of increasing safety and health performance.

[16], [MDR-P, 65 b]: The “Human Rights Policy” and the “TIM Health and Safety Policy” apply to all people in the TIM Group, extending the commitment to the TIM Group’s activities and related value chain.

The “Product and Service Procurement” Policy is valid for all Group Companies and is directly applicable to purchases made by the Procurement Department and functions who make purchases.

[16], [MDR-P, 65 c]: The implementation of the Human Rights Policy is ensured by the first levels of the main relevant business functions, including: the Sustainability Function, which is responsible for updating the contents of the Policy; the Human Resources Department, responsible for complying with the Policy with respect to TIM’s people; the Procurement Department, responsible for complying with the policy in relation to the involvement of the Group’s suppliers; the Compliance department oversees the risk of non-compliance with applicable regulations.

The implementation of the ‘Product and Service Procurement Policy’ is guaranteed by the Procurement Function in all its branches and responsibilities; by the Chief Financial Office function that ensures, at the Group level, the oversight of financial, administrative and economic-management processes; by the Legal and Tax function that ensures, at the Group level, legal protection, corporate compliance and the application of the governance model, as well as the definition of tax policies.

The adoption of the ‘TIM Health and Safety Policy’ is guaranteed by the Health, Safety & Environment department, which ensures the monitoring of issues relating to prevention, safety and health for workers, and by the Real Estate department, which is responsible for implementing compulsory occupational health and safety measures in company buildings.

[16], [MDR-P, 65 d]: The main international references guiding the drafting of the Human Rights Policy are:

- UN Universal Declaration of Human Rights, 1948
- UN International Covenant on Civil and Political Rights, 1976
- UN International Covenant on Economic, Social and Cultural Rights, 1976
- UN Human Rights Council, Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, A/HRC/17/31, 2011
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998
- OECD, Guidelines for Multinational Enterprises, 2011
- For the ‘Product and Service Procurement’ Policy, the external references are:
- Italian Legislative Decree 231/01 of 8 June 2001 - Regulations governing the administrative responsibility of legal persons, companies and associations with no legal status. (DC-2018-00498)
- Italian Legislative Decree 196/2003 - Data Protection Law. Data Protection Law (DC-2018-00069) and the Regulation (EU) 2016/679 General Data Protection Regulation (so-called. ‘GDPR’), (DC-2018-00235)
- Presidential Decree 313/2002 Consolidated text of the legislative and regulatory provisions on criminal records, the register of administrative sanctions imposed due to a crime and related pending charges. (DC-2018-00559)
- Italian Legislative Decree 81/2008 - Consolidated Law on the protection of health and safety in the workplace and subsequent amendments. (DC-2018- 00556)
- Italian Legislative Decree 152/2006 ‘Consolidated Law on the Environment’, as amended (DC-2018-00377)
- Consob Resolution no. 17221 of Mar 12, 2010 - Regulation containing provisions on related party transactions (DC-2018-00468)
- Italian Law no. 262 of December 28, 2005 - ‘Provisions for the protection of savings and the regulation of financial markets’ (DC-2018-00585). With regard to the Product and Service Procurement Policy, TIM operates within the framework of the Joint Audit Cooperation — JAC initiative (<http://jac-initiative.com>) of which the Group is a founding member. (1) JAC is a collective of telecommunications companies that aim to promote safe and fair working conditions, as well as responsible business, social and environmental management.

The Health and Safety Policy is inspired by the international standard ISO 45001 on occupational health and safety management systems.

[16], [MDR-P, 65 e]: Group Policies always consider aspects that have emerged as priorities following discussions with management and with the company’s main external stakeholders and have a strong influence on business activities and processes.

[16], [MDR-P, 65 f]: To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group’s company website [www.gruppotim.it](http://www.gruppotim.it), in compliance with “least privilege” and “need to know” principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some of the policies, such as the Code of Ethics and Conduct.

Information on TIM S.A.’s policies, on the other hand, can be found on its institutional website <https://ri.tim.com.br/en> in the dedicated “Regulations and Policies” section.

[17 a, b]: The TIM Group describes its human rights policy commitments in the Human Rights Policy, also with reference to workers in the value chain, referring to their fundamental Human Rights such as working hours, fair salaries, minimum working age, workplace conditions, accessibility to people with disabilities, protecting maternity, prohibiting harassment, forced/compulsory/bonded labor.

[18]: In its Policy on human rights, TIM explicitly condemns any form of forced or bonded labor, as well as any form of exploitation of children and young people, specifying also that people under 18 years of age are not employed.

[19]: The Human Rights Policy is in line with the principles promoted in the United Nations Global Compact, of which TIM is a member. Specifically, this Policy is in line with the United Nations guiding principles on business and human rights, with the ILO declaration on fundamental principles and rights at work and with the OECD guidelines for multinational enterprises.

## Disclosure Requirement S2-2 - Processes for engaging with value chain workers about impacts

[22 a, b, c, e]: As part of its activities, the TIM Group considers the views of workers in the value chain to guide its decisions and activities. The Company mainly indirectly involves such supply chain workers through consultation, dialogue, information and collaboration activities throughout the year. Specifically, involvement occurs:

- in the supplier qualification stage, with the collection of information and data and the request to sign the Code of Ethics and Conduct and the request for 45001 (occupational health and safety management system) certification or equivalent;
- during the double materiality analysis to define the impacts, risks and opportunities material to the company. In 2024, TIM involved 1,282 suppliers in the stakeholder engagement process;
- on an ongoing basis throughout the year by offering training and participation in ESG events through the Open-es platform, an open cross-industry ecosystem that engages companies in a common path of growth on sustainability performance.

TIM Group's policies, commitments, and strategies on stakeholder engagement, including value chain workers, are overseen at the executive level by the Corporate Communication & Sustainability Department and the Procurement & Logistics Department with regard to the path of improving the ESG performance of value chain workers through participation in Open-es.

The TIM Group assesses the effectiveness of worker involvement in the value chain by ensuring the participation of its supply chain in the double relevance analysis. In addition, the company monitors the registration of its suppliers on the Open-es platform, on which there is an increase of more than 5% year-on-year. Registered suppliers are involved in training and engagement activities for the adoption of tools to improve ESG performance.

[22 d]: The TIM Group is committed to upholding Human Rights beyond its own operations, aiming to be a proactive leader in initiatives and networks regarding Human Rights locally and internationally. The Company with respect to the value chain of the countries in which it operates, aims to prevent any form of abuse through:

- the respect, support and promotion of all internationally recognized Human Rights, even in the absence of national laws and regulations;
- the encouragement of partners to become advocates for Human Rights;
- the provision of whistleblowing mechanisms to report violations.

The Group is a founder and active participant of the local Global Compact networks in Italy and Brazil, and the Joint Alliance for CSR, the alliance promoted among ICT companies that aims to raise Human Rights standards within the supply chain.

In Brazil, TIM S.A. supports and encourages its partners to endorse the Universal Declaration of Human Rights and international conventions on civil, political, economic, social and cultural rights, as well as the policies of the International Labor Organization (ILO), the United Nations Human Rights Council, the Organization for Economic Cooperation and Development (OECD) and ISO 26000.

[23]: The TIM Group, in order to better understand the views of its own and value chain workers who may be vulnerable to impacts or marginalized, is actively involved in cross-company associations aimed at developing diversity-friendly strategies and best practices

For example, TIM is among the founding members of "**Parks - Free and Equal**," an association that promotes Diversity Management as a source of value and competitive advantage, exclusively dedicated to employers created to help member companies achieve an inclusive culture through training, organizational consulting, research, events and networking.

TIM also supports "**Valore D**", an association of companies in Italy that since 2009 has been a pioneer in the field of gender equity and the culture of inclusion, with a network that includes companies of different sizes and sectors, committed to creating more inclusive work environments.

Finally, TIM is a Platinum partner of the "**4 Weeks for Inclusion**" (4W4I) initiative, an alliance of 400 partners who alternate in a series of webinars and events focused on the enhancement of diversity and inclusion.

## Disclosure Requirement S2-3 - Processes to remediate negative impacts and channels for value chain workers to raise concerns

[27 a]: TIM Group, where it has caused or contributed to a material adverse impact on workers in the value chain such as in the case of possible workplace accidents, acts in accordance with the OECD Guidelines for Multinational Enterprises; with the United Nations Guiding Principles on Business and Human Rights; with the principles established by the eight core conventions of the International Labor Organization (ILO) on fundamental principles and rights at work; with the International Bill of Human Rights, including workers' rights. Through a subsequent direct or indirect discussion with workers in the value chain, it evaluates and monitors the effectiveness of the implemented remedy.

[27 b, c, d], [28]: In order for workers in the value chain to communicate their concerns or needs directly to the company and receive assistance on the matter, the TIM Group has equipped itself with the "Whistleblowing" channel (<https://portalessegnalazioni.telecomitalia.it/>) that can be accessed from the institutional website of TIM and Subsidiaries (where activated). The portal, in accordance with the relevant policy, ensures the confidentiality of the whistleblower's identity through the use of secure protocols and encryption tools. After entering information, the Portal provides a Unique Identifier Code, which can then be used to check the processing status and to send and receive communications (even anonymously). Alternatively, the following contacts are available:

- toll-free at 800664411;
- by standard mail to the Supervisory Body of TIM or the TIM Group company concerned, addressed to the company's registered office. Anyone who receives a report, in any form (written or oral), must forward it within 7 days of receipt to the Supervisory Body concerned, including through TIM's Audit Function, guaranteeing absolute confidentiality.

TIM Group then monitors reports from the Whistleblowing channel and conducts, periodically monitoring activities through measurement systems that consider particular performance indicators.

In Brazil, TIM S.A. has its own telephone reporting channel (at 0800 900 8007), operating 24 hours a day, 7 days a week. Full information is available at the link: [www.tim.com.br/sp/canal-de-denuncias](http://www.tim.com.br/sp/canal-de-denuncias). In addition, TIM's supply and service contracts include a specific clause in which the "contracting party" (suppliers and business partners) acknowledges TIM's Whistleblowing Channel and how it can be accessed, committing to use it if needed.

In TIM S.A., the Whistleblowing channel is managed by the Audit Department, which reports directly to the Board of Directors. Complaints are submitted during regular meetings of the Legal Review Committee (CAE) and the Control and Risk Committee (CCR).

The TIM Group monitors value chain workers' awareness of reporting channels by monitoring views and consultations. The effectiveness of the channel is also assessed annually through independent evaluations and monitored with key performance indicators such as the number of complaints received and the percentage of new suppliers adhering to the Code of Ethics and Conduct. In 2024, 31 reports were received through the whistleblowing channel and 100% of the newly qualified suppliers in Italy signed the behavioral principles of the Group's Code of Ethics and Conduct.

The Whistleblowing process ensures that the identity of the whistleblower remains confidential, to protect the whistleblower from retaliation, except when there is a law or court decision to the contrary. Suspicion of retaliation against the whistleblower may also be investigated.

## 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

[31], [MDR-A, 68 a,b,c], [MDR-A, 69 a, b, c, e], [32 a, b, c, d]: The TIM Group deploys actions and resources related to workers in the value chain, differentially in the Italian territory and in the Brazilian territory with respect to the following issues:

1. **Working conditions: health and safety;**
2. **Other work-related rights: forced labor, child labor.**

All actions are continuous, they are dedicated to workers in the value chain and have the goal of achieving continuous improvement of processes and the well-being of workers.

### 1. Working conditions

The actions described below in terms of health and safety mitigate the following negative impact inferred from the double materiality analysis "Insufficient safety measures, lack of training and inadequate protective equipment, which can cause accidents at work, injuries and damage to the health of employees and workers in the supply chain".

Actions are implemented periodically and continuously, with the understanding that the Company aims to minimize risks and ensure a healthy work environment for both employees and external workers. Activities are inspired by best practices and refer to national and international standards (ISO 45001).

The Group monitors and evaluates the effectiveness of actions taken through constant engagement with its suppliers, with whom it ensures that prevention and information measures are adopted and observed.

#### Domestic BU

The Company deploys a series of control measures to eliminate or contain risks in the workplace.

All suppliers of products and services are registered in an internal register that requires prior qualification and periodic checks to ensure competence and quality. In the contractual agreements governing relations with supplier companies, clauses are then included that make it mandatory to adopt specific workplace safety protocols.

Health and safety training programs are provided, and the use of advanced protective equipment is required in the performance of activities. In Italy, there is mandatory training for activities in confined or suspected polluted environments. Providers must demonstrate that they have acquired the necessary information to minimize the likelihood of accidents. Although the contracts do not provide specific training hours, sharing of tools and best practices for network contractors and office maintenance contractors are promoted.

Annually, monitoring campaigns for worker health and safety are carried out, with surveys of noise, electromagnetic fields, radiation, vibration and microclimate parameters, and the chemical and biological substances used are also checked. The commitment extends to network and sole proprietorships, which must comply with occupational medicine regulations.

Finally, periodic inspections of workplaces are conducted to ascertain compliance with applicable regulations. In 2024, audits were conducted on temporary construction sites with the support of an external certification company, which will continue in 2025.

#### **TIM S.A.**

The company identifies hazards and risks related to activities and products and services, considering the life cycle, through direct observations, document analysis, occupational health and safety (OSH) inspections and audits. Activities with potentially hazardous risks are carried out by qualified professionals, and in any case, according to occupational risk management analyses, no unsanitary conditions were found. Risk management programs are carried out by health, safety and environmental experts, providing input for control measures that reduce risks and ensure a healthy work environment.

For non-employee workers, the occupational safety system is directly implemented by supplier companies, based on the guidelines in the 'Regulatory Standard NR-05'.

## **2. Other work-related rights: forced labor, child labor**

### **Domestic BU**

The company puts in place controls and/or audits to ensure that the human rights of workers in the value chain are respected, in particular that people under 18 years of age are not employed, unless different legal limits are set in individual countries and in any case in compliance with relevant European policies. In any case, minors under the age of 18 should not be employed in hazardous work or during night hours.

Moreover, at companies in Italy, no activity is at risk of episodes of forced labor. TIM complies with regulations in all countries where it operates and adopts a Human Rights policy to prevent violations, following UN guidelines.

The following actions have been taken:

- **ESG assessment questionnaire at the qualification stage** for suppliers at risk (by geographic area, commodity group, economic impact) that requires a number of certifications including:
  - Ethical-Social Management System or SA8000
  - ISO 45001 "Occupational health and safety management systems."
  - ISO 37001 "Management Systems for the Prevention of Corruption."
  - ISO 30415 (Diversity & Inclusion)
  - programs or organization, management and control models suitable to prevent bribery
  - confidential procedure for reporting behavior that does not comply with the principles of the Code of Ethics

In 2024, out of a total of 217 qualified suppliers, about 18% are undergoing ESG assessment.

- **Audit with the Joint Alliance for Corporate Social Responsibility.** This alliance, which promotes cooperation among companies in the ICT sector, and of which TIM is one of the founding members, was created with the aim of improving the quality of audit and review practices. Each year, in accordance with the JAC, TIM plans at least five audits, to be conducted on-site, or on-desk and outsourced, involving possible suppliers at risk (by geographic area, commodity group, economic impact). The areas analyzed concern child labor; forced labor; health and safety; freedom of association; discrimination; disciplinary practices; working hours; wages and compensation; environment; business ethics. In 2024, 11 Audits were conducted.

#### **TIM S.A.**

The company evaluates suppliers according to Brazilian labor laws, consulting the databases of the "Business Pact for Integrity and Against Corruption" and the "Brazilian National Pact for the Elimination of Forced Labor." Suppliers who do not comply with labor laws may not provide services or products to the company. In addition, TIM does not hire suppliers at risk of child labor.

**[31], [MDR-A, 68 d]:** The TIM Group, in case of material adverse impacts on workers in the value chain, acts in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. This includes respect for the principles and rights set forth in the eight core conventions of the International Labor Organization and the International Bill of Human Rights.

**[33 a, b, c]:** To mitigate the detected negative impact on the health and safety of value chain workers, the TIM group takes an integrated and proactive approach that focuses on:

- **social due diligence:** analysis of impacts on workers (including workers' rights, occupational safety and health), working conditions, human rights protection and compliance with international standards);
- **supplier qualification and selection:** strict procedures with a focus on ISO 45001 certification and adherence to the TIM Code of Ethics;
- **continuous monitoring:** audits and field checks to ensure compliance with TIM standards and international regulations;
- **capacity building and engagement:** training and awareness-raising initiatives for suppliers, promotion of best practices related to health, safety and workers' rights, and participation in sector and cross-sector collaborations;
- **corrective actions and improvement plans:** development of improvement plans with suppliers to address significant issues and, if necessary, initiation of corrective actions, including change of supplier.

To report any security incidents or violations, TIM provides a process for receiving reports through the Supervisory Board of TIM or the Group company concerned, supported by the Audit Function. Within 7 days of receipt, an acknowledgement is given, and within 3 months, feedback is provided on the follow-up to the report.

TIM also ensures that processes to remedy negative impacts are available and effective by communicating them through the supplier portal and institutional website.

**[34 a]:** To mitigate the risk related to possible human rights violations in the company and along the supply chain, TIM adopts internal policies, procedures and regulations to ensure compliance with the Code of Ethics and Conduct. There are reporting and sanction systems for violations, accessible through the Whistleblowing portal. For suppliers in ESG risk areas, TIM conducts audits and requires specific certifications during qualification.

**[35]:** The TIM Group adopts a number of practices in order to avoid causing or contributing to causing material negative health and safety impacts on workers in the value chain. These include TIM's request to its suppliers to adopt the principles outlined in the Health and Safety Policy, the provision of criteria for selecting suppliers based on health and safety requirements and further initiatives detailed in section MDR-A 68 a-e.

**[36]:** In 2024, the TIM Group received no reports of serious human rights problems and incidents along the value chain.

**[38]:** In order to manage the material impacts that may affect workers in the value chain, the Group makes available resources from the Procurement, Audit, Legal, Health, Safety & Environment departments and the Supervisory Body, for the areas under their responsibility.

## S2-Metrics and targets

### Disclosure Requirement S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

**[41], [MDR-T, 81 b i, ii]:** To monitor the effectiveness of policies and actions related to the impacts, risks and opportunities of workers in the value chain, TIM adopts the following monitoring processes, consistent with standards and best practices, and performance indicators:

- **Health and safety:** Monitoring of suppliers' compliance with Group procedures and policies.
- **Human rights:** Monitoring the number of reported incidents involving workers in the value chain.



## Affected communities [ESRS S3]

### S3-Strategy

#### Disclosure Requirement SBM-2 – Interests and views of stakeholders

[S3 SBM-2, 7]: In setting its business strategy, TIM takes into account the opinions, interests and rights of the affected communities by implementing numerous initiatives and projects to promote their welfare and development. Through these moments of sharing, the Group also has a way to gather needs to develop and improve future initiatives. In addition, regarding indigenous peoples, TIM S.A. preliminarily consults these communities to identify their legitimate expectations before making investments in their areas.

#### Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

[S3 SBM-3, 8], [S3 SBM-3, 9 a,b,c,d], [S3 SBM-3, 10], [S3 SBM-3, 11]: As a leading telecommunications operator, TIM plays a key role in the country's digital infrastructure, with direct impacts on local communities through improved access to connectivity and digital services.

From the analysis conducted, there were no material negative impacts, risks or opportunities for the company related to the affected communities, while the following positive impact was identified:

- *“Projects that promote social inclusion, including through cultural and artistic programs, can help spread awareness in the community and in the new generations.”*

This impact is an expression of the projects that The TIM Group deploys to strengthen its role in the social context, including in the cultural and artistic spheres. Through innovative technologies and services, TIM facilitates the connection and activities of the community and the younger generation, contributing to the inclusive growth of society. Examples of cultural and arts programs include collaboration with IDMO to counter misinformation and facilitate the dissemination of best practices in the use of digital media, and collaborations with OPGE to foster training and education in digital citizenship, such as the “Technology - Digital literacy” program.

In conducting the double materiality analysis, the TIM Group took into account all the interested communities that may suffer material impacts from the company, including those directly related to its own operations and the value chain, including through products or services and business relationships. It also includes entities, regions and central institutions that operate in the reference territory, in Italy and Brazil.

The activities that the TIM Group implements to improve the quality of life of the reference community and to raise its awareness of issues of social inclusion, by their nature, impact the entire reference community without a specific geographical location or proximity to the company's headquarters.

### S3-Impact, risk and opportunity management

#### Disclosure requirement S3-1 - Policies related to affected communities

[14], [MDR-P, 65 a]: The aspects of the IROs that emerged as significant from the double materiality assessment for the topic ‘affected communities’ are covered in the “**Code of Ethics and Conduct of the TIM Group**” and in the “**Human Rights Policy**”. Both policies are linked to the following positive impact:

- *Projects that promote social inclusion, including through cultural and artistic programs, can help spread awareness in the community and in the new generations.*

The “**Code of Ethics and Conduct**” guides TIM's actions in carrying out its business, in the belief that a common vision of ethics in the daily conduct of business is the essential prerequisite for responsible and sustainable growth. Specifically, the document includes:

- the distinguishing values of the Group's culture;
- the rules of ethical behavior for people in the Group and the guidelines for the conduct to be pursued in dealings with third parties;
- the objectives and good practices relating to sustainability and social responsibility, in order to conduct business activities in a way that safeguards the various aspects of the environmental, social and governance-related affairs of the Group;
- the methods of complying with the Code through the description of the commitment of corporate boards and management teams, as well as the approach to managing violations, whistleblowing, and the methods of disseminating and adopting of the document.

In relation to the IRO material for the topic ‘Affected Communities’, the TIM document underscores its commitment to:

- supporting the economic wellbeing and development of the communities where it operates by providing quality services and introducing technologies to ensure an effective and sustainable digital transition
- responding to the community's needs, with particular attention paid to the needs of the most vulnerable groups, compatible with the objectives of economically efficient management.



The “**Human Rights Policy**” aims to make respect for Human Rights an essential requirement in carrying out the Group’s activities and also concerns third parties who enter into relationships with the company.

The Policy identifies Human Rights that may be influenced, directly or indirectly, by our activities, including fundamental Human Rights (e.g., working hours, fair wages, minimum working age, workplace conditions) rights concerning health and safety, rights protecting diversity and discrimination, rights agreed with unions, also including a number of personal rights related to our core business, such as the rights to access telecommunications services and innovation (e.g., digital, social and geographical inclusion). In relation to the IRO material for the topic “Affected Communities”, protection includes the rights of communities where TIM carries out its activities, with particular attention paid to vulnerable groups of people, such as the rights of children and young people to be protected from bullying or harassment and the rights to freedom of expression, supported by access to telecommunication technology.

The policy also sets out the processes through which the company undertakes to respect human rights. Specifically, all activities within the scope of the policy are subject to periodic internal due diligence inspired by the Guiding Principles of the United Nations Global Compact, which aims to:

- identify and map the human rights risks arising from the Group’s operational activities;
- confirm that each topic is governed by a specific internal regulatory framework (for example, policies or procedures), is monitored and tracked (where possible through appropriate indicators) and has had the related responsibilities assigned to it;
- establish a gradual improvement strategy which, beginning with simple compliance with local laws, steers human rights policies and processes towards engagement with the relevant stakeholders, through appropriate initiatives designed to engage them.

**[14], [MDR-P, 65 b]:** The Code of Ethics and Conduct applies to all people in the Group, with particular reference to the members of the corporate bodies, management, employees of all Group Companies, external collaborators, and, where required by the company’s procedural system, to third parties in business relationships with the Group. The Human Rights Policy covers all people in the TIM Group and aims to protect all third parties who enter into business relationships with the company, including affected communities.

**[14], [MDR-P, 65 c]:** The adoption of the Code of Ethics and Conduct was decided by resolution of the TIM Board of Directors on March 15, 2023. A periodic review of the Code is also ensured to implement any necessary updates.

The implementation of the Human Rights Policy is ensured by the first levels of the main relevant business functions, including: The Sustainability Function, which is responsible for updating the policy; the Human Resources Department, responsible for complying with the Policy with respect to TIM’s people, the Procurement Department, responsible for complying with the policy in relation to the involvement of the Group’s suppliers; the Compliance department oversees the risk of non-compliance with applicable regulations.

**[14], [MDR-P, 65 d]:** The Code of Ethics and Conduct is in line with the principles of the United Nations Global Compact with which TIM complies.

As far as the Human Rights Policy is concerned, the key third-party references used to draft this document are as follows:

- UN Universal Declaration of Human Rights, 1948
- UN International Covenant on Civil and Political Rights, 1976
- UN International Covenant on Economic, Social and Cultural Rights, 1976
- UN Human Rights Council, Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework, A/HRC/17/31, 2011
- UN High Commissioner for Human Rights, Guiding Principles on Business and Human Rights, Implementing the United Nations “Protect, Respect and Remedy” Framework, 2011
- UN Global Compact Office and Office of the United Nations High Commissioner for Human Rights, A Guide for Business: How to Develop a Human Rights Policy (2011 e 2015)
- UNICEF and The Danish Institute for Human Rights, Children’s Rights in Impact Assessments, December 2013
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998
- International Labor Organization, Conventions 1, 29, 30, 87, 98, 100, 105, 111, 135, 138, 144, 155, 161, 171, 175, 182, 183
- International Labor Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy
- Amnesty International — Italian chapter, Universal Declaration of Human Rights
- CSR Europe Assessing the effectiveness of company grievance mechanisms, 2013
- European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, 2013
- OECD, Guidelines for Multinational Enterprises, 2011
- Charter for Equal Opportunities and Equality at Work, signed by Telecom Italia in 2010.

**[14], [MDR-P, 65 e]:** Group Policies always consider aspects that have emerged as priorities following discussions with management and with the company’s main external stakeholders and have a strong influence on business activities and processes.

[14], [MDR-P, 65 f]: To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group's company website, in compliance with "least privilege" and "need to know" principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some of the policies, such as the Code of Ethics.

[15]: TIM has not identified material impacts related to indigenous peoples; therefore, it does not provide disclosure on specific provisions relating to policies intended to prevent and manage such impacts.

[16 a]: The TIM Group describes its commitments regarding human rights policy, including community rights, in its Human Rights Policy (with reference to the latter, as referred to ESR5 S1-1 20 a). This Policy is for all the Group's stakeholders and is in line with the principles promoted in the United Nations Global Compact, which TIM endorses. Specifically, this policy is in line with the United Nations guiding principles on business and human rights, with the ILO declaration on fundamental principles and rights at work and with the OECD guidelines for multinational enterprises.

[16 b]: In Italy, TIM engages with its reference communities through: intraoperative work panels; participation in working groups organized by trade associations such as ASSTEL, Anitec-Assinform, Confindustria Digitale Federazione; collaboration with public and local bodies; the organization of and/or participation in meetings and events in the area. At European level, TIM is also a member of the "Large Scale Partnership" with the objective, thanks to its digital skills, of encouraging the development and implementation of innovative solutions on a large scale for individuals and businesses for the purposes of the digital transition (for more details on engagement channels, see the disclosure requirement ESR52 -SBM2).

In Brazil, TIM S.A. steers its engagement actions on the basis of the principles defined in the "Engagement Policy" in which it defines, among other things, the communication and engagement channels for its reference communities.

[17]: The Human Rights Policy is in line with the principles promoted in the United Nations Global Compact, which TIM endorses. The same policy is in line with the United Nations guiding principles on business and human rights and the OECD guidelines for multinational enterprises (with reference to the latter, as referred to ESR5 S1-1 20 a). Although the Policy does not contain specific references to compliance with internationally recognized standards for indigenous peoples, the TIM Group conducts its activities in compliance with all applicable human rights standards, regardless of ethnic, religious, gender and other aspects that may characterize the communities concerned, ensuring consistency with the provisions of the United Nations and the Global Compact, in its capacity as an endorsing member. Lastly, it should be noted that TIM has not reported cases of non-compliance with the guiding principles inspiring the Policy.

## Disclosure Requirement S3-2 - Processes for engaging with affected communities about impacts

[21 a, b]: The TIM Group guides its decisions and activities by directly involving affected communities through regular consultations, dialogues, information, and collaboration. For example, in 2024, to promote the importance of culture in environmental sustainability, TIM launched the "Mission Environment - Generations at School for Sustainability" project in collaboration with ERG, fostering dialogue between school and company. It also produced the podcast "Equality Can't Wait" to discuss issues of social inclusion, gender equality, and the role of women in society and the world of work.

The TIM Group periodically involves affected communities in varying times and ways depending on the activity. For example, for the double materiality analysis, stakeholders are involved at the beginning of the process through e-mail, while for the 4 Weeks 4 Inclusion project, involvement occurs annually through video calls and e-mail exchanges.

Policies and strategies for stakeholder engagement, including local communities, are overseen at the executive level by the Chief Public Affairs, Security & International Business Office, the Chief Human Resources & Organization Office, the Corporate Communication & Sustainability Office, as well as the TIM Foundation in Italy and the Instituto TIM in Brazil which fund and support community projects.

The TIM Group evaluates the effectiveness of involving affected communities in various ways, depending on the current activity. In the case of double materiality assessment, for example, it monitors it with the active participation of stakeholders in answering the questionnaire. In the case of other projects, however, it monitors community participation and their propensity for involvement through questionnaires.

[22]: In order to better understand the points of view of affected communities, TIM adopts an inclusive approach in listening to and involving communities, with particular attention paid to groups that may be more vulnerable, such as women and young people. When designing social responsibility initiatives and digital inclusion programs for local areas, the company partners associations and non-governmental organizations that work closely with these groups, including, for example, the Onda Foundation. The collaboration focuses on participation and support in projects to prevent and combat violence against women, with a particular focus on education for non-violence. This synergistic approach aims to promote female empowerment, especially among younger women, while promoting a greater collective awareness of the importance of counteracting all forms of discrimination.

[23]: TIM S.A.'s social responsibility policy is committed to contributing to the economic well-being and growth of local communities, including traditional communities, indigenous peoples and quilombolas, through the provision of efficient services and advanced technologies. In addition, TIM S.A. preliminarily consults these communities to identify their legitimate expectations before making investments in their areas. Finally, it supports socio-environmental actions in the communities where it operates through sponsorships and institutional support.

## Disclosure Requirement S3-4 - Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

[31], [MDR-A, 68 a, b, c, e], [MDR-A, 69 a, b, c]: As part of its activities, the TIM Group deploys actions and resources that promote social inclusion, including through cultural and artistic programs, which help to foster an awareness in the community and in the new generations and confirm the TIM Group's commitment to supporting innovative activities with a social impact. Most projects, especially those involving partnerships with other bodies and companies, are repeated annually in order to give continuity to the positive impact the Group has on communities. For each project, the Group hopes to increase participation and make an increasingly material positive impact.

Due to the corporate discontinuity that occurred on July 1, 2024, it is also not possible to provide comparative information on the activities compared to those of previous years.

### Domestic BU

- **Women Plus:** The program is focused on the empowerment and professional development of women inside and outside the company. The initiative is based on:

- engagement with representatives of the local community (women's associations, schools, universities) to promote the meeting between talents and opportunities in the area.
- Awareness-raising and Sharing: communication projects dedicated to breaking gender stereotypes, promoting positive messages and success stories.

By constantly listening to the needs of communities and through the involvement of stakeholders, Women Plus helps to create an environment in which the values of equal opportunities are effectively protected and pursued.

The initiative is monitored by looking at the final data on app downloads, which totaled 15,000 downloads at December 31, 2024. The financial resources used amounted to: OpEx: €2,491k, future OpEx: €200k.

- **"Equality Can't Wait" podcast:** is a TIM project that addresses gender equality and is part of the Women Empowerment initiatives. The episodes, 4 released in 2024 and 2 coming in 2025, are based on true stories, include exciting interviews and useful data to promote a culture of equality. Produced by Storie Libere, the podcast was previewed for TIM Group employees on the TIM Academy internal training platform and then made available on major podcasting platforms. As of December 31, 2024, it recorded 3,900 external views and 5,338 internal views. The financial resources used in 2024 were €24,875k, with a future budget of €10k.
- **ITS Maria Gaetana Agnesi:** TIM is among the founding partners of the Maria Gaetana Agnesi Higher Technological Institute, with the goal of training new generations of digital professionals. The ITS, hosted at the TIM Academy in Rome, offers specialized training paths for young graduates in strategic areas such as Data Analysis and Artificial Intelligence.
- **Italian Digital Media Observatory (IDMO):** TIM, is a partner in the second edition of IDMO, the Italian hub of the EDMO Consortium, which is committed to countering misinformation on the Web and educating young people to recognize trustworthy content. In the first edition of the project, which ended in the first quarter of 2024, e-learning courses were produced and webinars delivered on digital literacy, privacy, information disorder and content creation, which reached 18,000 participations among students and teachers from 60 educational institutions.
- **Technology Digital Literacy Project with OPGE:** the project, born in 2019 from the collaboration between TIM and the Permanent Youth-Editor Observatory, aims to foster digital literacy among the younger generation. Aimed at secondary schools enrolled in the "Newspaper in the Classroom" initiative, the project combines media literacy and digital literacy to help students develop critical awareness and digital skills needed to properly use digital tools. The financial resources included CapEx of €480k.
- **Distretto Italia:** TIM is a partner in Distretto Italia, a program of the ELIS Consortium established in 2023 to bridge the gap between the demand for technical profiles and youth training. Supported by more than 50 companies, the project offers free orientation and training activities throughout the country in cooperation with schools, training centers and universities. TIM promotes the program through its communication channels: social, website and intranet.
- **Mission Environment - Generations at sustainability school:** the project was realized in 2024 through a collaboration between TIM and ERG to spread the culture of sustainability in schools through intergenerational dialogue. Organizing partner was ELIS, a nonprofit educational organization. The project is recognized by the Ministry of Education and Merit as a Pathway for Transversal Skills and Orientation (PCTO) for third and fourth grade secondary school classes. The financial resources used in 2024 amounted to €34.8k.
- **Vivere Il Prossimo:** the call launched by the TIM Foundation focuses on social inclusion, supporting projects that help families with people with disabilities, particularly minors, in their social, relational, and employment needs. More than 300 applications were received from all over Italy. The grant was awarded €113,503k to the "Bread and More" project of the Opera Sacra Famiglia Foundation and €113,121k to the "Caregiver fatigue - disability and oncological poverty in Taranto" project of the Soleterre Foundation.
- **Vivere l'Arte:** the TIM Foundation's call for proposals focuses on innovative visitor routes and tools in cultural institutions, museums, galleries, collections, monuments and archaeological areas. With more than 300 applications received from all over Italy, the call was awarded €130k to the "Galileo Live Museum" project (Galileo Museum in Florence), €147,276k to the "Vittoriale da vivere" project (Il Vittoriale degli Italiani Foundation), and €214,520k to the "Vivere il design" project (ADI Compasso d'Oro Foundation).

- **Vivere il Talento:** the TIM Foundation's call for proposals concerns the field of scientific research and education and is dedicated to discovering and promoting steering solutions to prevent the phenomenon of NEET. The project was very successful, receiving more than 300 applications from all over Italy, with winning participants located throughout the country, and saw the award of €159.22k for the project by Federico II University of Naples 'Talento in gioco' ('Talent at play').

The company has prepared additional initiatives with the aim of producing positive impacts for affected communities:

- **Accelerating Sustainability in Telecoms (AST):** a collaboration between Connect Europe (association of European telco operators) and Uni Europa ICT, (European ICT union association), aimed at understanding the impact of new digital technologies on skills and the labor market. The goal is to identify best practices and business cases of telecom operators and disseminate them through Policy Guidelines translated into 5 languages.
- **4 Weeks 4 Inclusion:** conceived by TIM, this is a four-week interagency program with events, webinars and workshops dedicated to diversity and inclusion. Aimed at TIM people and the public, the program addresses topics such as gender equality, inclusion of people with disabilities, multiculturalism, and sexual orientation. Promotes dialogue and exchange of best practices, creating a network of businesses and organizations committed to supporting local communities and preparing new generations for a more inclusive future.
- **Fondazione Onda:** TIM and Fondazione Onda work together to combat violence against women by promoting a culture of nonviolence through social and digital projects that address the needs of women, particularly younger women, and vulnerable communities, with the aim of fostering women's empowerment and raising collective awareness against all forms of discrimination.
- **42 ROMA Luiss:** TIM is a strategic partner of 42 ROMA Luiss, a free coding school based on the French Ecole 42 model. The innovative teaching program is based on peer-to-peer learning and coopetition, without lecturers. Launched in 2021, the partnership involves TIM organizing workshops and internships for students, while LUISS launches calls for ideas on topics of interest to TIM.
- **Career Days and Company visits:** In 2024, TIM participated in the Career Days and Job Fair of major Italian universities, with a focus on STEM events. It also organized a company visit for female students from the Turin Polytechnic University at the Customer Innovation Center, where they attended demos on TIM's new technology products.

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- **Bateria do Instituto TIM (Drum Group):** inclusive initiative in Rio de Janeiro organized by Instituto Tim that offers music education to children, youth, and adults, with and without disabilities, to promote inclusion and develop musical skills. The program involved 250 participants, including 56% with disabilities and 30% living in favelas, producing 56 performances.
- **Exponential Education:** the project implemented by Instituto TIM and the NGO One By One, offers a technology literacy and digital entrepreneurship course to socially vulnerable people with and without disabilities. It involved 82 participants in 2024 and generally contributes to the digital inclusion of nearly 100 people a year.
- **Edital Fortalecendo Redes:** the initiative strengthens non-governmental organizations in the Gerando Falcões network, which are active in the areas of culture, sports, leisure and education. The project aims to support organizations working with children, adolescents and youth in socially vulnerable situations by promoting their human development. The goal is to help about 9,000 people.

All activities conducted by Instituto TIM during 2024 had an OpEx equal to €446k.

[32 d]: The Group monitors the effectiveness of actions taken through people's participation and to the results achieved. For example, in the case of Distretto Italia, 37 courses were held during 2024 and 421 people were trained, with a placement rate of 96.8%; while in the case of the Technology Digital Literacy project with OPGE, the 2024/2025 edition has 3,003 enrolled classes, with 353 trainers and 78,078 students.

[36]: As part of the proposed initiatives, no serious human rights problems and incidents were reported during 2024 in relation to affected communities.

[38]: In order to manage the positive impact related to the affected communities, the Group: employs economic resources to finance projects and partnerships, and internal human resources to ensure their proper execution; provides information dissemination through channels inside and outside the company.

## S3- Metrics and targets

### Disclosure Requirement S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

[41], [MDR-T, 81 b i, ii]: To monitor the effectiveness of policies and actions related to the impacts, risks and opportunities of affected communities, TIM adopts the following monitoring processes, which comply with standards and best practices and performance indicators:

- with reference to community social inclusion aspects, the Group monitors the number of initiatives involving institutes, schools and research organizations;
- with reference to aspects related to the production of positive impacts for the community, the Group monitors the satisfaction of the participants in the proposed initiatives through the satisfaction questionnaires that it administers at the end of each activity or project carried out.

## Consumers and end-users [ESRS S4]

### S4-Strategy

#### Disclosure Requirement SBM-2 – Interests and views of stakeholders

[S4 SBM-2, 8]: In setting its business strategy, TIM considers the interests, opinions and rights of consumers and/or end users as a priority. Feedback and active involvement of consumers and the organizations that represent them in various capacities are used to monitor the level of satisfaction and response to new offerings or projects and initiatives launched, guiding the company's future actions.

#### Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

[S4 SBM-3, 9 d], [S4 SBM-3, 10 a]: The TIM Group, as a leading operator in telecommunications and digital services, recognizes that impacts on consumers and end users arise directly from its business model and guide strategic decisions. Network reliability, data protection, and cybersecurity, as well as the deployment of new technologies (5G, cloud computing, IoT, AI) are essential to ensure a safe and quality user experience and to improve consumers' lives, but they require careful management of potential impacts, such as technological obsolescence and the risk of misinformation.

From a risk perspective, TIM considers, for example, possible cyber attacks or privacy breaches that could undermine consumer confidence and lead to regulatory sanctions. Precisely for this reason, the Company constantly invests in resilient infrastructure, data protection, and digital education initiatives to raise users' awareness of the conscious use of technology.

The impacts, risks and opportunities that emerged from the **double materiality analysis for consumers and end users**, related to own operations and the value chain, show how:

- the types of end users considered are: customers who purchase TIM products and services and interact directly with the Company; consumers, i.e., end users who use the acquired products/services;
- No material risks have been identified with regard to the use of products that may harm the health of consumers and end users;
- Consumers and/or end users of TIM services may be exposed to negative impacts in relation to privacy rights and the possible violation of personal data;
- All those considered end users need accurate and accessible information on products or services for conscious use and transparent business practices that can promote informed choices.
- Among the end users of the TIM Group, minors may be among those who are particularly vulnerable to privacy impacts.

[S4 SBM-3, 10 b]: Compared to the **three material negative impacts** that emerged from the double materiality analysis, two appear to be general in nature, namely:

- *"Digital illiteracy widens socio-economic gaps and does not allow full customer participation in the economy".*
- *"The inability of the company or supply chain to conduct a responsible business, which responds to ethical social demands and transparent business practices, may limit competition and consumers' informed choices".*

The negative impact associated with the individual non-material incidents recorded during 2024, on the other hand, appears to be as follows:

- *"Potential cybersecurity threats may involve the leak of sensitive customer and/or employee data".*

[S4 SBM-3, 10 c]: The TIM Group, through the offerings of voice and internet services and products managed and developed in fixed and mobile, the offerings of connectivity services and products and ICT solutions, the offering of international voice, data and internet services, generates the following **three material positive impacts** on consumers who can be individuals, families, small and medium-sized businesses, or large national and international companies:

- *"The adoption of digital technologies in business processes can improve the quality of service to customers and the ability to manage unexpected events that may interfere with the continuity of the service";*
- *"The expansion in the offering of technologies and digital access (for example, PEC, digital signature, SPID) can lead to more inclusive connectivity for consumers";*
- *"Connectivity solutions that use digital technologies such as IoT, Big Data and AI ensure better data traffic planning for the benefit of customers".*

[S4 SBM-3, 10 d]: The double materiality analysis found the following **eight material risks** from impacts on consumers and/or end users:

- *"Cyber attacks and sabotage to physical infrastructure can cause an interruption in the operational continuity of services, causing a deterioration in economic and financial performance and reputational damage";*
- *"Unauthorized access to the personal data of customers or employees can result in legal liability, regulatory sanctions, economic and financial damage and reputational damage";*



- "Risks related to online security, such as cybercrime, cyberbullying and inappropriate content can result in legal liability, economic and financial losses and damage to reputation";
- "The spread of pandemics or the occurrence of geopolitical conflicts can lead to potential shortages in the supply of goods and services and price increases, with consequences on the continuity of business activities and on the company's economic-financial flows";
- "Failure to implement digital inclusion actions aimed at the accessibility and continuity of the services offered may result in customer dissatisfaction, potential sanctions and economic and financial losses";
- "Potential legal liabilities and financial sanctions deriving from antitrust investigations (e.g. incorrect business practices) can damage corporate reputation, with consequences on the company's economic and financial flows";
- "The lack of technological transformation of legacy infrastructures and platforms can reduce the quality of service offered to customers and increase the vulnerability of systems, with consequences on business reputation";
- "Failure to achieve coverage objectives may limit the offering of high-speed connectivity, with consequences on the customer experience and on economic-financial flows".

Instead, below are the **three material opportunities** arising from impacts on consumers and/or end users:

- "Personalized and transparent offerings and seamless connectivity improve the customer experience, encouraging customer loyalty with consequences on the company's economic and financial flows";
- "The acceleration of fiber roll-out and 5G can promote digital transformation and the enablement of new services and applications, contributing to greater customer satisfaction and the consolidation of market leadership";
- "The development of new business models that use advanced digital technologies (e.g. 5G, AI) can improve the company's operational efficiency, with consequences on economic-financial flows and benefits for consumers".

[S4 SBM-3, 11], [S4 SBM-3, 12]: The main types of consumers and/or end users negatively affected by the material impacts of the TIM Group include weaker customer groups with lower levels of literacy, such as children, the elderly and people who are not aware of IT risks, in particular for privacy and cybersecurity.

On the occasion of the double materiality analysis, the materiality of the impacts on the part of the category of customer stakeholders was evaluated, being able to identify the impacts that negatively influence them and the risks associated with them.

The material opportunities identified, on the other hand, concern all types of customer and consumer as they relate to the potential offered to the dissemination of new technologies and the use of digital services.

## S4-Impact, risk and opportunity management

### Disclosure requirement S4-1 - Policies related to consumers and end users

[15], [MDR-P, 65 a]: The aspects of the IROs that emerged as significant from the double materiality assessment for the topic "Consumers and End-Users" are covered in the "Human Rights Policy", the "Code of Ethics and Conduct", the "Information Security Policy", the "System of rules for the application of personal data protection regulations" and the "Services Charter". All documents are linked to the following material impacts, risks and opportunities that emerged from the double materiality assessment:

#### Negative impacts

- "Digital illiteracy widens socio-economic gaps and does not allow full customer participation in the economy"
- "Potential cybersecurity threats may involve the leak of sensitive customer and/or employee data";
- "The inability of the company or supply chain to conduct a responsible business, which responds to ethical social demands and transparent business practices, may limit competition and consumers' informed choices".

#### Positive impacts

- "Connectivity solutions that use digital technologies such as IoT, Big Data and AI ensure better data traffic planning for the benefit of customers";
- "The adoption of digital technologies in business processes can improve the quality of service to customers and the ability to manage unexpected events that may interfere with the continuity of the service";
- "The expansion in the offering of technologies and digital access (for example, PEC, digital signature, SPID) can lead to more inclusive connectivity for consumers".

#### Risks

- "The lack of technological transformation of legacy infrastructures and platforms can reduce the quality of service offered to customers and increase the vulnerability of systems, with consequences on business reputation";

- "Failure to achieve coverage objectives may limit the offering of high-speed connectivity, with consequences on the customer experience and on economic-financial flows";
- "Failure to implement digital inclusion actions aimed at the accessibility and continuity of the services offered may result in customer dissatisfaction, potential sanctions and economic and financial losses";
- "The spread of pandemics or the occurrence of geopolitical conflicts can lead to potential shortages in the supply of goods and services and price increases, with consequences on the continuity of business activities and on the company's economic-financial flows";
- "Risks related to online security, such as cybercrime, cyberbullying and inappropriate content can result in legal liability, economic and financial losses and damage to reputation";
- "Cyber attacks and sabotage to physical infrastructure can cause an interruption in the operational continuity of services, causing a deterioration in economic and financial performance and reputational damage";
- "Unauthorized access to the personal data of customers or employees can result in legal liability, regulatory sanctions, economic and financial damage and reputational damage";
- "Potential legal liabilities and financial sanctions deriving from antitrust investigations (e.g. incorrect business practices) can damage corporate reputation, with consequences on the company's economic and financial flows".

### Opportunities

- "Personalized and transparent offerings and seamless connectivity improve the customer experience, encouraging customer loyalty with consequences on the company's economic and financial flows";
- "The development of new business models that use advanced digital technologies (e.g. 5G, AI) can improve the company's operational efficiency, with consequences on economic-financial flows and benefits for consumers";
- "The acceleration of fiber roll-out and 5G can promote digital transformation and the enablement of new services and applications, contributing to greater customer satisfaction and the consolidation of market leadership".

The **Code of Ethics and Conduct** guides TIM's actions in carrying out its business, in the belief that a common vision of ethics in the daily conduct of business is the essential prerequisite for responsible and sustainable growth. Specifically, the document includes:

- the distinguishing values of the Group's culture;
- the rules of ethical behavior for people in the Group and the guidelines for the conduct to be pursued in dealings with third parties;
- the objectives and good practices relating to sustainability and social responsibility, in order to conduct business activities in a way that safeguards the various aspects of the environmental, social and governance-related affairs of the Group;
- the methods of complying with the Code through the description of the commitment of corporate boards and management teams, as well as the approach to managing violations, whistleblowing, and the methods of disseminating and adopting of the document.

In relation to the IROs material for the topic "**Consumers and End-Users**", the TIM document underscores its commitment to:

- operating with a view to the excellence of the service offered, with dedication and professionalism, in order to meet the expectations and needs of customers;
- basing contracts on transparency, professional fairness, compliance with sector regulations, and courtesy and collaboration, in line with our commitment to the importance of our customers;
- protecting information generated or acquired within the Company or in the course of business relationships, safeguarding the confidentiality required in conducting business, in compliance with the appropriate regulations.

The "**Human Rights Policy**" aims to make respect for Human Rights an essential requirement in carrying out the Group's activities and also concerns third parties who enter into relationships with the company.

The Policy identifies Human Rights that may be influenced, directly or indirectly, by our activities, including fundamental Human Rights (e.g., working hours, fair wages, minimum working age, workplace conditions) rights concerning health and safety, rights to protect diversity and discrimination, trade union rights. In relation to IROs material for the topic "Consumers and End-Users", protection includes a number of personal rights related to our core business, such as: rights to access telecommunication services and innovation (for example, digital, social and geographical inclusion) or rights to the needs of the individual in developing services and products; rights to privacy of the Group's customers, as well as to their security; rights potentially violated by value-added services (including services with content reserved for adults and gambling); Customers' rights to responsible advertising.

The policy also sets out the processes through which the company undertakes to respect human rights. Specifically, all activities within the scope of the policy are subject to periodic internal due diligence inspired by the Guiding Principles of the United Nations Global Compact which aims to:



- identify and map the human rights risks arising from the Group's operational activities;
- confirm that each topic is governed by a specific internal regulatory framework (for example, policies, procedures), is monitored and tracked (where possible through appropriate indicators) and has had the related responsibilities assigned to it;
- establish a gradual improvement strategy which, beginning with simple compliance with local laws, steers human rights policies and processes towards engagement with the relevant stakeholders, through appropriate initiatives designed to engage them.

The **'Information Security Policy'** focuses on the protection of information and all related assets, as a fundamental element for the protection and continuity of business processes.

The Group undertakes to:

- establish processes, roles and responsibilities to ensure information security;
- guarantee a level of confidentiality, integrity and availability of information proportional to the respective business value, or to the direct or indirect losses that a security incident may have regarding the services provided to customers;
- guarantee the security of services provided to its customers and the levels of business continuity provided for in contracts.

TIM has an Information Security Management System in place that guarantees the governance of specific processes and activities for the security of information assets.

The **'System of rules for the application of personal data protection regulations in the TIM Group'** sets out the norms and operating rules for the Group that govern the processing of personal data, in accordance with applicable legal and regulatory provisions on personal data protection.

The document concerns the processing of personal data of all the company's stakeholders, defining the methods of corporate oversight and related responsibilities, as well as the technical/organizational measures for data protection.

Regarding customers, the document refers to the regulations and procedures to be observed in the processing of their personal data with reference, among other things, to marketing and sales activities, profiling, loyalty, market research, trials, prevention and combating late payments and fraud, as well as to the specific provisions provided for electronic communications (e.g. regarding traffic data and geolocation data, cookies).

Lastly, TIM publishes the **'Services Charter'**, for fixed and mobile phone services, with the aim of establishing a transparent relationship with its customers. The document summarizes the company's main services, terms of service, complaint procedures, service quality standards, and contractual information.

To contextualize the Group's policies in the Brazilian business context, TIM S.A. has set out a **'Privacy Policy'** that defines how the company collects, uses and protects the personal data of its customers, in line with the General Law on the Protection of Personal Data (LGPD), 13709/2018. The policy also states that the company does not allow minors to take out contracts for TIM Products/Services, nor does it process Personal Data of individuals under 18 years of age, in the provision of TIM Services, even if paid for by adults.

The **"Cybersecurity Policy"** is another material policy, which defines guidelines to promote the IT security of telecommunications networks and services and protect the critical telecommunications infrastructures of the Group's companies, in accordance with current legislation, with the aim of preventing and minimizing impacts related to cyberattacks. In its policy, TIM is committed, among other things, to fostering a culture of cyber prevention, to ensuring a prompt response to incidents, and to securely storing the data of employees, suppliers, business partners and customers.

**[15], [MDR-P, 65 b]:** The Code of Ethics and Conduct applies to all people in the Group, with particular reference to the members of the Corporate Boards, management, employees of all Group Companies, external collaborators, and, where required by the company's procedural system, to third parties in business relationships with the Group.

The Human Rights Policy concerns all the people of the TIM Group and aims to protect all third parties who enter into business relationships with the company.

The Information Security Policy is for all Group functions and companies that, within the scope of their specific responsibilities, operate in various ways using company information and data.

The **'System of rules for the application of personal data protection regulations in the TIM Group'** is aimed at all companies in the TIM Group, and in particular their respective internal privacy delegates, who must ensure the correct application of the system by their respective business functions.

Lastly, the **'Services Charter'** is for all TIM fixed network and mobile network customers.

**[15], [MDR-P, 65 c]:** The adoption of the Code of Conduct was decided by resolution of the TIM Board of Directors on March 15, 2023. A periodic review of the Code is also ensured to implement any necessary updates.

The implementation of the Human Rights Policy is ensured by the first levels of the main relevant business functions, including: The Sustainability Function, which is responsible for updating the policy; the Human Resources Department, responsible for complying with the Policy with respect to TIM's people, the Procurement Department, responsible for complying with the policy in relation to the involvement of the Group's suppliers; the Compliance department oversees the risk of non-compliance with applicable regulations.

The Information Security Policy is approved by the Compliance, Public Affairs, Security & International Business Office and Human Resources & Organization departments, in order to ensure consistency between TIM's strategy and the policy content.

The adoption of the 'System for the application of personal data protection regulations' is ensured, in TIM and in the Group Companies, by internal privacy officers, with necessary support and advice from the Privacy Department (in TIM) and the Privacy Coordinators (in the Group Companies). In fact, the Privacy department is responsible, within the context of the role of TIM's Data Protection Officer (DPO), for steering, coordinating and overseeing the correct application of privacy legislation at Group level; in the Group's companies, this role is held by the Privacy Coordination figure, in conjunction with TIM's DPO.

Lastly, the application of the Services Charter is overseen by the various business functions, that work together to ensure compliance with the service standards described.

**[15], [IMDR-P, 65 d]:** The Code of Ethics and Conduct is in line with the principles of the United Nations Global Compact with which TIM complies.

As far as the Human Rights Policy is concerned, the key third-party references used to draft this document are as follows:

- UN Universal Declaration of Human Rights, 1948
- UN International Covenant on Civil and Political Rights, 1976
- UN International Covenant on Economic, Social and Cultural Rights, 1976
- UN Human Rights Council, Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, A/HRC/17/31, 2011
- UN High Commissioner for Human Rights, Guiding Principles on Business and Human Rights, Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011
- UN Global Compact Office and Office of the United Nations High Commissioner for Human Rights, A Guide for Business: How to Develop a Human Rights Policy (2011 e 2015)
- UNICEF and The Danish Institute for Human Rights, Children's Rights in Impact Assessments, December 2013
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998
- International Labor Organization, Conventions 1, 29, 30, 87, 98, 100, 105, 111, 135, 138, 144, 155, 161, 171, 175, 182, 183
- International Labor Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy
- Amnesty International — Italian chapter, Universal Declaration of Human Rights
- CSR Europe Assessing the effectiveness of company grievance mechanisms, 2013
- European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, 2013
- OECD, Guidelines for Multinational Enterprises, 2011
- Charter for Equal Opportunities and Equality at Work, signed by Telecom Italia in 2010.

For the Information Security Policy, the main external references of the document refer to:

- ISO/IEC 27000:2018 - Information technology - Security techniques - Information security management systems - Overview and vocabulary
- ISO/IEC 27001:2022 - Information security, cybersecurity and privacy protection - Information security management systems - Requirements
- ISO/IEC 27002:2022 - Information security, cybersecurity and privacy protection — Information security controls
- ISO/IEC 27035-1:2023 Information technology - Information security incident management - Part 1: principles and process
- ISO/IEC 27035-2:2023 Information technology - Information security incident management - Part 2: Guidelines to plan and prepare for incident response
- ISO/IEC 27035-3:2020 Information technology - Information security incident management - Part 3: Guidelines for ICT incident response operations.

For the "System of Rules for the application of personal data protection regulations in the TIM Group", the main regulatory references are:

- the General Data Protection Regulation (Regulation (EU) 2016/679, aka the GDPR)
- Personal data protection code (Legislative Decree 196/2003 as amended)
- Data Protection Authority provisions.

Lastly, the TIM Services Charter is drawn up based on the guidelines established by the National Telecoms Regulator (Resolution 179/03/CSP as amended).

[15], [MDR-P, 65 e]: The Group Policies take into account aspects identified as fundamental and priority by analyses conducted internally and with external stakeholders. These aspects are strongly linked to the operations of the TIM Group Companies.

[15], [MDR-P, 65 f]: To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group's company website, in compliance with "least privilege" and "need to know" principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some of the policies, such as the Code of Ethics and Conduct.

[16 a]: The TIM Group describes its commitments regarding human rights policy, including the rights of consumers and end-users, in its Human Rights Policy. The Policy, aimed at all the Group's stakeholders and in line with the principles promoted in the United Nations Global Compact, of which TIM is a member, explicitly refers to the United Nations guiding principles on business and human rights, the ILO declaration on fundamental principles and rights at work and the OECD guidelines for multinational enterprises.

[16 b]: In its Human Rights Policy, TIM specifically encourages its stakeholders, including consumers and end-users, to provide feedback on the Policy itself with a view to continuous improvement.

[16 c]: To remedy the impacts on human rights, TIM, through the "Whistleblowing Procedure", governs the process of managing reports, referring to Group employees and/or third parties, concerning breaches of laws and regulations of Group Conduct, including potential violations of Human Rights.

[17]: TIM is one of the founders of and active participants in the local networks of Global Compact Italy and Brazil and in the JAC, an initiative in the ICT sector that has the common objective of raising Human Rights standards (social, environmental and ethical) within the supply chain.

In line with principles also promoted in the United Nations Global Compact, TIM has drafted the Human Rights Policy, also referring to consumers and end-users. This policy is in line with:

- the United Nations Guiding Principles on Business and Human Rights;
- the ILO declaration on fundamental principles and rights at work;
- OECD guidelines for multinational enterprises;
- the International Charter of Human Rights.

In the value chain downstream of TIM, no cases of non-compliance with these guiding principles inspiring the policy have been reported. This result reflects the Group's commitment to the promotion and protection of Human Rights, achieved through respect for international standards, a broad interpretation of rights, the involvement of partners, the management of negative impacts and the availability of complaint mechanisms.

The TIM Group explains its policies to its reference stakeholders in compliance with 'least privilege' and 'need to know' principles, through its institutional website, the corporate intranet, the supplier portal, as well as, in some cases, through appropriate reference in contractual clauses to be familiar and/or comply with the Group's policies. To increase the accessibility of the information contained in the policies, the documents are written in Italian, English and Portuguese.

## Disclosure Requirement S4-2 -Processes for engaging with consumers and end-users about impacts

[20 a, b]: The company takes into account the expectations and opinions of consumers, in the belief that robust and satisfactory relationships are the only way to guarantee long-term value. The feedback and active involvement of consumers and the organizations that represent them in various capacities are fundamental to guide the company's actions and improve its business strategies. TIM directly confronts the issues most material to its business through the consultation, dialogue, information and collaboration activities that are organized periodically.

Quality and customer experience are monitored by an extensive continuous system of listening to end consumers during all stages of their Customer Journey (from acquisition to possible termination), which is one of the inputs used for defining improvement actions. This system includes, among other things, market insights, customer satisfaction monitoring activities, satisfaction surveys on the occasion of the launch of new products/services.

Another important moment of engagement with consumers is the double materiality analysis, which aims to identify and evaluate the impacts, risks and opportunities material to the company and preparatory to preparing its sustainability report. During this analysis, all classes of stakeholders identified, including end consumers, are involved in a survey where they have to evaluate the impacts of the company's activities on the environment and society. As many as 3,000 consumers were surveyed in 2024.

TIM cooperates with consumer associations to ensure their rights are protected, improve the quality of services offered, and promote information. In 2024, for example, the "Fiber" training course for Consumer Associations was completed to provide an in-depth understanding of the technical characteristics of fiber optics and its advantages over other connection technologies. Also in 2024, a meeting was held with all Consumer Associations to announce and share the logic of the TIM Plan for decommissioning its copper access network.

With respect to Enterprise customers, TIM Enterprise takes a structured approach to directly engaging customers through:

- digital factories for specific business areas (Cloud, IoT, Cybersecurity, Digital Identity), ensuring direct and personalized relationships with customers;

- quarterly surveys conducted by third parties on key touchpoints and processes, using certified metrics such as CSI and NPS to measure satisfaction.

#### **TIM S.A.**

TIM S.A. also takes into account consumer expectations and opinions through customer engagement that takes place at different times and in different ways during the year through various channels:

- Multichannel service: App Meu TIM; Virtual assistant; Social media; WhatsApp; Online chat; Call Center: 144\* and 1056\*; Meu TIM website;
- Ombudsman: a second-instance channel that provides assistance to customers who have already used TIM's service channels;
- Specialized service for the deaf;
- Surveys on experience and satisfaction, such as consumer profiles and habits, the attractiveness of services and products and the image;
- Branding initiatives that aim to bring the Company closer to customers, including actions created as part of major events, such as Rock in Rio.

In addition to the aforementioned channels, another consumer engagement initiative of TIM S.A. involves the establishment of the TIM Users' Council, which aims to bring the company closer to customers and consumer protection associations. The Council promotes social participation in service delivery, contributing to a more engaged society on telecommunications issues. It also provides input for continuous improvement of the customer experience.

**[20 c]:** Operational responsibility for ensuring the engagement and satisfaction of consumers and end-users and enterprise results lies with the two main business lines such as the Chief Enterprise and Innovative Solutions Office and the Chief Consumer, Small & Medium and Mobile Wholesale Market Office, with support from the Data Analytics, Artificial Intelligence & Customer Insight function within the Chief Strategy & Business Development Directorate.

With regard to double materiality, the TIM Group's policies, commitments and strategies on stakeholder involvement are monitored at executive level by the Corporate Communication & Sustainability Department under the supervision of the Sustainability Committee, which operates at the level of the Board of Directors. In the context of TIM's more institutional initiatives, supervision with consumer associations is overseen by the Customer Protection & Transparency function within the Legal, Regulatory & Tax Department.

In Brazil, TIM S.A.'s Chief Revenue Officer (CRO) and Customer Experience & Ombudsman are dedicated to ensuring that customer engagement takes place. The latter function ensures the definition of strategy, customer experience improvement initiatives, and provides methodological support to business segment lines for conducting market research, monitoring satisfaction indicators, and generating insights to ensure implementation of best practices, as well as actions to develop a Caring for the Customer culture.

**[20 d]:** The TIM Group evaluates the effectiveness of consumer and/or end-user involvement in the following ways:

#### **Domestic BU**

TIM oversees the effectiveness of consumer engagement, quality and customer experience, through an extensive engagement system that detects the customer's journey at the various touch points and allows us to define specific improvement plans to give value to customer feedback. Italian market surveys include the monitoring of the 'Customer Satisfaction Index' based on the ACSI standard (American Customer Satisfaction Index), which was particularly important, measuring the quality perceived by TIM customers and customers of main competitors. In 2024, the CSI value for consumer customers in the Italian perimeter fell slightly compared to 2023 figures. The Small and Medium Business segments, on the other hand, reported an increase, compared to the previous year, in the CSI value, reaching the assigned targets. In addition, TIM Enterprise evaluates the effectiveness of engagement through the continuous monitoring of perceived quality and the creation of personalized SLAs with customers.

#### **TIM S.A.**

The company maintains an open dialogue with its customers by means of research and the declarations registered with consumer protection agencies, such as Procons, the website Consumidor.gov.br, the Special Civil Courts and Anatel. In this way, it can constantly evaluate and monitor customer needs.

Regarding surveys to assess customer experience and satisfaction, TIM S.A. has been conducting "Experience" and "Net Promoter Score (NPS)" surveys on its customers and competitors through continuous interviews since June 2017. It also assesses customer satisfaction after contact with the call center. Anatel conducts an annual survey on satisfaction and perceived quality of telecommunication services.

The Company has a team dedicated to monitoring transactional NPS in the mobile and Ultra Fiber segments, which develops plans to improve service experience and satisfaction in collaboration with different business lines.

**[21]:** To better understand the point of view of consumers and/or end-users, TIM has always maintained relationships with trade associations that also advocate for the most vulnerable. TIM has always been on the consumer protection front to counter particularly aggressive commercial actions and policies or commercially unfair practices.

In Brazil, TIM S.A. offers an accessible online space for people with visual, hearing and speech disabilities, following WCAG and W3C guidelines. Among the resources available, the Libras Center allows customers

using Brazilian Sign Language to communicate via video call with a 24/7 specialized intermediary. Starting in 2022, the company will also offer a WCAG-compliant keyboard navigation experience.

### **Disclosure Requirement S4-3 - Processes to remediate negative impacts and channels for consumers and end-users to raise concerns**

**[25 a]:** In line with the OECD guidelines that require companies to protect human rights, including those of consumers, TIM ensures accessible and fair remedy mechanisms in order to resolve any disputes in an appropriate and transparent manner.

**[25 b, c]:** The TIM Group makes available to its consumers and/or end-users multiple reporting channels so that they can communicate their concerns or needs and receive assistance.

Within the **Domestic BU**, the following channels are available:

- Whistleblowing Channel;
- Human and non-human Customer Care channels to report malfunctions on the network and/or other services as well as to file commercial and administrative complaints such as: 187 fixed line Customer Service; 119 mobile Customer Service; 119 business Customer Service; the My TIM app (residential customers) and the MyTIM business app (business customers); TIM's commercial site with business and technical support sections and with the possibility of filling out a form to report needs thanks to the virtual assistant Angie (chatbot, also present on the MyTIM APP);
- Social channels (Facebook, Instagram, X, LinkedIn);
- The Group's institutional website [www.gruppotim.it](http://www.gruppotim.it) for reports of behavior or events attributable to cases of abuse in the use of network services offered by Telecom Italia;
- TIM AI Customer Assistant: the artificial intelligence-based virtual assistant, revolutionizes business interactions by offering advanced digital assistance. By analyzing customer data, it can offer tailored answers and solutions, improving the customer experience and increasing customer loyalty.

In Brazil, **TIM S.A.** provides the following specific channels: App Meu TIM; Virtual assistant; Social media; WhatsApp; Online chat; Call Center: 144\* and 1056\*; the Meu TIM website, the Ombudsman's Office, meetings of the User Council and the Whistleblowing Channel.

**[25 d]:** The TIM Group through the Customer Care function, in Italy and Brazil, ensures caring activities, addressing and managing the reports raised by end consumers. In particular, this function ensures that the technical and administrative assistance process is properly managed and monitored on an ongoing basis. In this process, end-consumers are involved in satisfaction surveys in which they have the opportunity to give feedback on the level of care they receive.

With reference to IT security, TIM ensures the effectiveness of processes aimed at mitigating risks and negative impacts by measuring the number of incidents occurring on the systems perimeter, employee workstations, public network service nodes and data center infrastructure.

**[26]:** The TIM Group informs consumers of the channels and processes for expressing concerns and receiving assistance through commercial sites and the corporate site, handling each report in a timely manner and monitoring the effectiveness of reports. The Whistleblowing procedure guarantees anonymity and protection of the identity of the whistleblower, revealed only with express consent and to authorized persons. TIM Enterprise uses digital tools and information activities to inform users on how to report, providing protections against retaliation through secure and confidential mechanisms.

### **Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions**

**[30], [MDR-A, 68 a,b,c,e], [29 a], [MDR-A, 69 a, b, c]:** In relation to the IROs that have emerged from the double materiality analysis regarding “consumers and end users”, the Group deploys actions and resources regarding aspects related to the following issues:

1. **Information-related impacts for consumers and/or end-users;**
2. **Personal safety of consumers and/or end-users;**
3. **Social inclusion of consumers and/or end users.**

Actions are targeted at customers both in Italy and in Brazil, and involve internal operations and the value chain, especially in terms of providing technological solutions.

Due to the corporate discontinuity that occurred on July 1, 2024, it is also not possible to provide comparative information on the activities compared to those of previous years.

#### **1. Information-related impacts for consumers and/or end-users**

The following describes actions aimed at preventing cyber attacks and sabotage on company systems, which can disrupt business continuity of services and/or cause the leakage or unauthorized access of sensitive customer data.



## Domestic BU

TIM ensures the logical security and protection of IT and infrastructure resources through the Cyber Security process, which includes the following activities:

- **ICT Risk Management:** The process focuses on technology assets to ensure Confidentiality, Integrity and Availability (RID) of information. This process identifies security and compliance requirements to reduce the vulnerability of ICT assets, defines security countermeasures validated by technical controls, and verifies their effectiveness. Where necessary, re-entry plans are defined for risk treatment, the results of which are formalized in the ICT Asset Security Plan.
- **Cyber Threat Intelligence (CTI):** the process includes several key steps: the collection of data from various internal and external sources to acquire data on threats or threat actors (TAs) and the techniques they use; threat analysis to identify patterns and trends; the sharing of relevant information within the organization to prepare for countering threats; the implementation of security measures to prevent, detect and respond to attacks (includes the management of Indicators of Compromise (IoC); continuously monitoring and reviewing security strategies to adapt to new threats and improve the effectiveness of defenses.
- **Vulnerability Assessment:** Two main activities are carried out in the field inspection phase, which allows for the verification of the gap between the security requirements of the Security Plan and their implementation in the IT infrastructure: The Vulnerability Assessment and Penetration Test. Vulnerability Assessment is an automated activity that identifies vulnerabilities in IT systems, while Penetration Test is a manual activity performed by experts in ethical hacking to test the resilience of IT infrastructures. The objective is to assess the security level of ICT Assets by identifying vulnerabilities and attack vectors in the operating environment and assessing the risk.

This activity is integrated into a continuous security cycle and can be performed periodically or after changes to the IT infrastructure. The process includes a monthly scan of exposed resources on the Internet that are considered high risk. Upon completion, the Safety Plan (PDS) is updated with the information gathered, providing a more realistic risk picture.

- **Cyber Security Engineering and operations services:** these activities involve the engineering, development and testing of centralized security solutions that enable the identification, protection, detection and response processes outlined by the National Institute of Standards and Technology (NIST) Cybersecurity Framework. In particular, the activities focus on:
  - data security: identity and access management, authentication, authorization and accounting platforms for business applications, databases and operating systems (e.g. IAM, PAM, 2FA, MOTP);
  - application security: solutions to protect business applications and processes (e.g., key management, web application firewalls, ICT vulnerability and risk management);
  - network and cloud security: platforms to protect the network from external and internal threats (e.g., FW, IPS, IDS, Anti DDoS); platforms for authentication, authorization and network element accounting (AAA) and remote access solutions (VPN, ZTNA);
  - security monitoring and management: platforms for log management, monitoring, analysis and management of security events (e.g. SIEM, Security Log Analytics, Log Management), Risk Management, Cyber Threat Intelligence, Vulnerability Assessment etc.;
  - endpoint security: solutions to protect mobile devices, PCs and servers (e.g. EPP, XDR, Web Proxy, Antispam).

In addition to these activities are those needed to ensure:

- efficient, reliable, and secure operation of security platforms and applications, includes delivery, installation, configuration, continuous tuning, performance monitoring, early detection of anomalies, troubleshooting, update management, and end-user support;
- Digital Identity management, which includes configuration, centralized management and periodic verification of accounts for network and ICT resources, in accordance with applicable regulations and policies (e.g., Legislative Decree 196/03, Resolution 152/02/CONS, Regulation (EU) 2016/679 - GDPR).
- **Security Monitoring and Incident Management:** the activities ensure continuous monitoring of IT infrastructure and business systems to detect suspicious behavior, vulnerabilities, emerging threats, and abnormal activity, using real-time network monitoring tools that collect and analyze useful information, identify intrusions or cyber attacks, and respond in a timely manner. Activities are overseen by the Security Operations Center (SOC), a team of IT security experts who constantly monitor network security, 24/7. In parallel, Incident Management manages and resolves security incidents to minimize damage and prevent recurrence. These processes, which conform to ISO/IEC 27001:2022 and ISO/IEC 27035 standards, are divided into four sub-processes: 1. event identification; 2. classification; 3. analysis and technical management; 4. follow-up. Measures are repeated and continuous throughout the year, preventing cyber security risks and continuously improving processes.

Overall, the annual expenditure for 2024 for Cyber Security activities directly overseen by the corporate function stands, net of those directly addressed by the other technical lines for specific vertical actions, at about €30,000k in CapEx and €10,000k in OpEx.

## TIM S.A.

The company seeks to ensure customer cybersecurity by implementing policies, monitoring systems, training employees and adopting advanced technologies to prevent, detect and respond to incidents. Cyber attacks, mapped in the enterprise risk matrix, can cause damage to systems, unavailability of services, and infiltration

of malware. Since 2022, the company has been ISO 27001 certified, the international standard for information security management, which attests to how it manages the ICT risks, prevents information leaks and cyber attacks, monitors and responds to security incidents, and implements new cybersecurity solutions. Therefore, we have a committee dedicated to satisfying security controls in internal and external audits of our operations.

The company also monitors and manages “data holders” in addition, to ensure a better experience for customers in handling their personal data. In 2024, more than 600 requests were received from the data holder mainly related to: revocations of consent; Information on data sharing; data deletion request.

## 2. Personal safety of consumers and/or end-users

Consumer safety is a top priority for the TIM Group. In fact, risks relating to cybercrime, cyberbullying and inappropriate content can affect user security and business reputation. In this regard, the Company responds with:

- Cybersecurity Awareness solutions and programs for safe and responsible browsing;
- collaboration with institutions and public bodies to raise awareness among companies and citizens of digital risks and advanced AI-based Threat Detection systems so as to protect the digital ecosystem;
- solutions and services geared toward the online safety of consumers, including minors that include: child protection tools that can be activated on fixed or mobile connections; security services that protect against cyber attacks such as malware and phishing; parental control functions.

## 3. Social inclusion of consumers and/or end users

To lead the country's technological transformation and ensure the social and digital inclusion of families, businesses and institutions, the TIM Group develops and offers affordable services and advanced technology solutions in Connectivity, Cloud, IoT, and Cybersecurity.

**For families,** TIM offers:

- **connectivity solutions** based on Fixed Wireless Access (FWA) Technology, including with 5G coverage, to provide stable, high-speed Internet access even in areas without physical cabling or underserved by fiber, including rural and suburban settings, supporting the digital inclusion of families;
- **digital identity tools** such as PEC, digital signature and SPID facilitate access to public, health and financial digital services, simplifying use for users with difficulties in providing physical documents or in-person identification, while ensuring greater protection of personal data and security of online transactions;
- **subsidized prices** for customers with disabilities on voice and internet offerings (in compliance with Resolution 290/21/CONS) and for customers with low income on voice offerings (in compliance with Universal Service ex Resolution 258/18/CONS) by extending on our initiative the facilitation also to internet offerings.

**For large enterprises and public administrations,** TIM Enterprise offers advanced technology solutions in Cloud, IoT, Cybersecurity that address the needs of businesses and institutions, helping to mitigate the risks and negative impacts associated with digital transformation, and enhancing opportunities for sustainable and inclusive growth. TIM Enterprise adopts a dedicated organizational model with the Group's digital factories, such as Noovle for Cloud, Olivetti for IoT, Telsy for Cybersecurity, and Trust Technologies for Digital Identity, ensuring a direct and personalized relationship with customers. Below is a summary of the main strands of offerings:

- **Cloud Offerings:** TIM Enterprise's Cloud solutions reduce operational risks by ensuring integrity, availability, protection and confidentiality of corporate data, while also offering regulatory compliance (GDPR). Integrated with digital identity services such as PEC, digital signature and SPID, the solutions simplify access to public and private services and support inclusive and sustainable work models through smart working and digital collaboration platforms. Integration with next-generation networks such as fiber and 5G offers higher speed and lower latency for Cloud applications, creating innovative digital ecosystems in areas such as smart industry, digital health, and smart infrastructure management.

Finally, the Cloud offering supports the adoption of innovative technologies such as Artificial Intelligence, transforming business operations, and improving customer interaction. Below are some cloud-based solutions:

- **Digital School** is the solution that promotes digital education for schools, including in remote areas, which includes access to fast connections via fiber optics and 5G, use of platforms for innovative teaching, provision of digital devices and cybersecurity services for safe use of technology. The offering promotes social inclusion as it is also designed to support students with disabilities by offering accessibility tools such as voice readers, automatic subtitles, and intuitive interfaces.
- **AI Customer Assistant** is the solution that provides an AI-based virtual assistant and automates repetitive tasks, improving operational efficiency and allowing employees to focus on strategic tasks. Available 24/7, the assistant simultaneously manages and personalizes interactions on different communication channels (chat, email, phone), improving customer experience and satisfaction. It also collects valuable data to improve products, services, and marketing strategies.
- **IOT offers:** IoT technology enables real-time monitoring of critical infrastructure, machinery, and networks, reducing the risk of failure, sabotage, and cyber attacks. The expansion of the 5G network and fiber optics enables such technology and enhances it, offering greater real-time data processing capacity and a more secure interconnection between devices and infrastructure. TIM Enterprise offers advanced monitoring



systems, predictive maintenance, physical security solutions, and smart land platforms for monitoring environmental risks that optimize energy, water, and reduce waste.

In addition, the integration of IoT platforms with AI and Big Data offers applications that improve the quality of life in communities and government services through smart city, smart land, smart mobility, and smart agriculture solutions that promote equitable and sustainable digitalization, and reduce the social divide.

Innovative IoT projects with 5G and Virtual Reality also aim to enhance the country's cultural and artistic heritage. Here are some examples:

- **VisitAR Bologna** app offers an immersive and interactive experience through augmented reality, guiding visitors to discover places related to Guglielmo Marconi and the city of Bologna. The app enhances and personalizes the visitor experience, offering personalized and interactive content, providing stable connectivity, while helping to valorize the city's historical and musical heritage.
- **Taobuk 2024.** TIM is a partner of the international festival in Taormina, which celebrates the meeting of literature, art, science, and technology. TIM's contribution aims to highlight how a smart city can also be a place that preserves beauty and culture, creating new opportunities for Italy's artistic and cultural heritage through digital innovation. During the event, visitors were able to enjoy an immersive experience made possible by an eXtended Reality platform combining the technologies of Cloud, Artificial Intelligence, and 5G, and Virtual Reality viewers, discovering Taormina's iconic places, accompanied by the reading of texts from famous works.

- **Cybersecurity offerings.** TIM Enterprise's cybersecurity solutions protect Italian companies from cyber risks, ensuring a secure and reliable digital environment. Thanks to the expertise of Telsy, the TIM Group's center of excellence with more than 200 certified experts, the portfolio of offerings includes: Threat Intelligence, Incident Response, and Business Continuity solutions that identify and prevent threats, ensure rapid recovery times, and reduce the risk of disruptions; Data Protection and Compliance solutions that provide advanced encryption, secure access management, and regulatory compliance (e.g., GDPR); Cybersecurity Awareness solutions, to counter risks related to cybercrime, cyberbullying, and inappropriate content. TIM Enterprise ensures that these services are secure, accessible to all, and integrated with cybersecurity technologies to protect identities and online transactions. In 2024, TIM Enterprise took significant steps to spread the culture of cybersecurity and maximize the accessibility and adoption of these services.

Key Cybersecurity actions during 2024 reflect TIM Enterprise's commitment to spreading a culture of cybersecurity:

- **NIS2 (Network and Information System Directive).** TIM Enterprise, in collaboration with Telsy, supports companies and public administration in compliance with the NIS2 Directive, which aims to strengthen the security of networks and information systems. Initiatives include: the "Cyber Risk Evaluation & Management" offering; organizing roadshows with Confindustria in various Italian cities to offer practical insights into technological solutions for regulatory compliance; drafting a white paper to offer practical guidance for companies and the public administration, illustrating the technology solutions needed to achieve regulatory compliance;
- **TIM Guardian** is an IT security solution for small and medium-sized businesses and public administrations, designed to protect Mobile, Fixed, MPLS and SDWAN connectivity without the need for additional software or equipment. Using artificial intelligence-based controls, the solution protects customer privacy and mitigates Cyber threats, ensuring safe browsing. As of December 2024, 152,785 mobile lines and 20,172 fixed lines have been activated on this offering;
- **Check & Support** is a standard package for SMBs, small municipalities, and schools, offering operational support through Telsy in case of an attack, insurance for legal fees, and a tool to identify security problems. In 2024, 273 customers adopted this solution;
- **Telsy skills** is an offering that helps companies train their employees and monitor awareness levels to prevent cyber solicitations. More than 50 companies have adopted this offering, involving more than 10,000 employees in the training.
- **Connectivity:** TIM Enterprise offers high-performance, flexible, and reliable fixed and mobile connectivity services that support businesses and Public Administration in the digital transition with nationwide coverage. The offering is distinguished by the customization of services, with scalable options and clear pricing packages that optimize costs. One of TIM Enterprise's priorities is to ensure continuity of service. The SD-WAN offering optimizes and monitors network performance in real time, enabling rapid recovery in case of failures, and improving the reliability of connections between business locations. TIM Enterprise also promotes digital inclusion with solutions such as FWA technology, which offers high-speed Internet services even in areas underserved by fiber, enabling small and medium-sized businesses, schools, and other entities to access modern, high-performance connectivity.

#### TIM S.A.

In Brazil, TIM S.A. is part of the "Conectividade em Escolas Rurais" Program, sponsored by Anatel Agência Nacional de Telecomunicações, the Brazilian government agency responsible for regulating and supervising the telecommunications sector, which aims to ensure coverage of rural areas in the country, including public schools. TIM S.A. also positively impacts connectivity-based rural productivity through the "Rural connectivity and digital inclusion" program. Currently, more than 20 million hectares are covered by 4G and more than 42.4 million hectares by NB-IoT, impacting more than 1.9 million people in rural areas.

[30], [MDR-A, 68 d], [31 a, b, d]: In relation to consumers and end users:

- to mitigate the negative impact *"Digital illiteracy widens socio-economic gaps and does not allow full participation of customers in the economy,"* in **Domestic BU**, TIM offers voice and internet offers at subsidized prices to low-income customers, in compliance with Resolution 290/21/CONS.

In Brazil, **TIM S.A.** invests in remote areas to boost the economic and social development of these regions in infrastructure expansion. TIM S.A., in fact, is the first operator to reach a 100% nationwide presence with 2G, 3G or 4G technologies. Specifically, 4G will serve all 5,570 Brazilian municipalities from December 2023. In addition, it has been a pioneer in the activation of 5G networks in the country, a segment in which it has been the coverage leader since 2023. TIM S.A. has a Conduct Adjustment Agreement with Anatel, with which it is committed to expanding mobile broadband technology to around 350 municipalities numbering fewer than 30,000 inhabitants (target already achieved).

In general, the Company monitors the effectiveness of its actions by ensuring a connection service in the most remote areas where it operates so that consumers and end users are not socially and economically excluded.

- To mitigate the negative impact, *"The inability of the company or supply chain to conduct responsible business that meets ethical social demands and transparent business practices can limit competition and informed consumer choices,"* the Company has policies and procedures in place to ensure transparency of services offered, respect for human resources and consumer protection.

The company verifies the application of and compliance with the policies cited in ESRS S4 MDR-P, datapoint 65 a in all processes.

- With reference to the impact *"Potential cybersecurity threats may result in the leakage of sensitive data of customers and/or employees"* in **Domestic BU**, only one incident with medium impact was reported, caused by a DDOS (Distributed Denial of Service) type attack characterized by unusual attack methods, which was promptly mitigated by the deployment of appropriate countermeasures, which were then made structural. The incidents worthy of reporting, which still remain with low impact, were two (caused by process or system vulnerabilities) out of a casement of 8265, while the others had no impact. To mitigate this impact, since 2003, TIM has implemented a comprehensive "Privacy Operating Model" to ensure the proper application of data protection regulations at the Group level. This model, developed on the principle of privacy-by-design, is constantly being improved and is based on:

- transposing legislation and the indications of the Privacy Authority;
- the assigning of roles and responsibilities for personal data processing obligations;
- the drafting of disclosures for various categories of stakeholders (e.g., employees, customers);
- the assessment of the risk associated with processing activities, recorded in the appropriate Registries (pursuant to the GDPR);
- the implementing of appropriate technical and organizational measures to ensure a level of security appropriate to the risks.

TIM monitors and evaluates the effectiveness of the Privacy Operating Model through the figure of the Data Protection Officer (DPO) with advisory, training, informational and supervisory functions regarding the application of privacy regulations, who informs and advises the organization and its employees about data protection obligations under the GDPR and monitors the organization's compliance with the Regulations and internal data protection policies and procedures.

In addition, another method of evaluating the effectiveness of the actions implemented relate to measuring customer satisfaction and reducing security incidents.

In Brazil, **TIM S.A.**, to prevent adverse impacts related to potential cybersecurity threats, seeks to continuously protect the cybersecurity of its customers by implementing policies, monitoring systems and employee training, and adopting advanced technologies, to prevent, detect and respond to incidents. In this regard, TIM S.A. has:

- adopted and reinforced measures such as hiring a digital tool for the assistance service and the management of the Data Controller's Rights, thus providing a better customer experience in exercising their rights;
- continuously and constantly implemented the processes and actions under the ISO 27001 (Information security management system) certification obtained in 2022;
- created the Privacy Center on the institutional website;
- created an internal security flow for incidents or personal data leaks.

In Brazil, TIM S.A. maintains an open dialogue with its customers by means of research and the declarations registered with consumer protection agencies, such as Procons, the website Consumidor.gov.br, the Special Civil Courts, and Anatel. In doing so, it constantly tracks its actions and customer needs. Anatel also evaluates operators' services annually by way of a survey on satisfaction levels and the perceived quality of telecommunications services.

The company also has a dedicated team tracking the transaction NPS for various customer journeys, both in the mobile and Ultra Fibra segments. The team develops plans to improve the experience and satisfaction with services, together with the different business areas.

TIM S.A. tracks the service and the management of Data Controllers' Rights, thus offering customers a better experience in exercising their rights. Due in part to the aforementioned methods of evaluating performance effectiveness, no complaints about privacy violations and/or loss of client data were brought to the attention of the DPO.

[31 c]: With respect to the goal of making a positive contribution to improving social outcomes for consumers, within the Italian territory, all the actions implemented by the company have been extensively described and refer to ESRS S4 datapoint 31, letters a, b, d.

[32 a, b, c ]: To mitigate negative impact "Potential cybersecurity threats may result in leakage of sensitive customer and/or employee data" see actions for BU Domestic and TIM S.A extensively described in ESRS S4 datapoint 30.

[33 a]: In relation to material risks relating to online security (such as cybercrime and cyberbullying), cyberattacks and sabotage of physical infrastructure, and unauthorized access to customers' personal data, TIM applies its wide-ranging Cyber Security process, which safeguards logical security and protects IT and infrastructure resources, as noted in MDR-A in the section "Information-related impacts for consumers and/or end-users".

The goal is to avoid incidents that could compromise customers' cybersecurity, with consequences in terms of loss of trust in the company. The effectiveness of the cybersecurity process is evaluated through constant monitoring of individual process steps and results in risk management. Risks related to cybersecurity and sabotage of physical infrastructure are also monitored within the Enterprise Risk Management (ERM) model adopted by the TIM Group, which takes into account the reference context.

[33 b]: On the relevant opportunity "The development of new business models using advanced digital technologies (e.g., 5G, AI) can improve the company's operational efficiency, with consequences for economic and financial flows and benefits for consumers", the TIM Group adopts advanced technologies such as 5G and AI to improve operational efficiency and generate benefits for consumers. In the short run, these technologies improve resource management and generate value for the enterprise and consumers. In the long run, they foster the development of new business models, the acquisition of new market segments and the consolidation of consumer relationships.

5G technology offers numerous opportunities for the development of new business models in various sectors and is the basis for the many solutions offered by TIM. 5G is being used in the application of the Internet of Things to smart cities, telemedicine, automation and industry 4.0, augmented and virtual reality, and remote working. These models help to improve the quality of life for consumers, make core services more accessible and personalized, while providing companies with innovation and reduced operating costs.

In these models, IoT technology is increasingly integrated with AI to improve operational efficiency and customer experience. For example, the TIM Smart Home offering dedicated to families offers home automation solutions that integrate IoT devices with smart applications to optimize energy consumption, monitor security, and automate different functions in the home. In TIM Enterprise, most of the solutions dedicated to companies use AI applications.

AI also offers opportunities within the company, thanks to a growing number of areas in which it is being applied as below:

- **Optimization of Customer Service** through: analysis of customer-operator conversations using speech recording algorithms to better understand customer needs and propose effective solutions; Use of virtual assistants available 24/7 to customize answers and solve problems in real time; Implementation of chatbots to provide concise answers on procedures and bid content to front-end and back-office operators; application of generative AI to improve understanding of customer dialogues and provide relevant and personalized responses.
- **Predictive analytics:** AI can analyze customer data to predict trends and behaviors thus enabling personalization of offers and services.
- **Network infrastructure management:** AI can optimize infrastructure management by monitoring services in real time that detect malfunctions or congestion, allowing timely actions and reducing downtime.
- **IT Security:** AI can improve the security of IT networks and systems to identify anomalous behavior and potential threats, helping to prevent cyber attacks.
- **Simplification of internal processes:** the use of algorithms can automate internal operational processes, reducing the workload and increasing the overall efficiency of business activities.

[34]: Through constant monitoring of reporting channels and Customer Care activities dedicated to technical and administrative customer support, TIM acknowledges, analyzes the reports received. In a preventive form, all actions, processes, and actions that the company puts in place are aimed at avoiding any possible negative effects on consumers and/or end users. In addition, through the broader Cyber Security process, the company ensures responsible and secure management of consumer data and ensures that its marketing and sales practices are designed to prevent negative impacts.

[35]: As far as the TIM Group companies in Italy are concerned, at the date of publication of this sustainability statement, the TIM Group had received no reports for 2024 relating to serious human rights' issues and incidents related to consumers and end users.

[37]: To manage material impacts on consumers and end users, different business functions develop Business Plans, define actions and dedicate associated budgets, activating dedicated working groups where necessary to finalize the material activities.

## S4-Metrics and targets

### Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

**[MDR-T 80 a, b, c, d, e, f, i]:** TIM, in the 2025-27 Plan, has identified the following specific targets for the Domestic BU perimeter:

1. **Advanced digital solutions** +17% YoY in the period 2025-27
2. **Digital Identity Services** +30% CAGR by 2025

Through these long-term targets, the progress of which is monitored periodically, the Group confirms its commitment to addressing the challenges and opportunities associated with technological transformation.

Targets are expressed as relative goals relative to an initial reference point.

Specifically, target 1 refers to revenues from sales of IoT, Cloud & Security services and is represented as a YoY percentage increase starting from the base year 2024. Consolidated TIM Enterprise revenues are considered, which also include Olivetti, Telsy, and Noovle net of inter-company items. The target being constructed as a % YoY increase, already presents de facto intermediate targets.

The target did not change in terms of slopes compared to the previous year, also as a result of changes in the organizational scope, as it relates to the company's core activities. An alignment was made in terms of the mode of summarization, moving from CAGR to YoY. The results confirm a 26% increase in revenues at the end of 2024 compared to 2023 with an over performance of Cybersecurity solutions revenues that recorded +50%, while cloud revenues reached +22%.

Target 2 refers to PEC, SPID, and Digital Signature digital services and is expressed as the percentage growth of active services as from the base year 2022 (CAGR). The target, specifically, is given by the sum of the number of active PEC boxes, the number of active SPID digital identities, and the number of Digital Signature certificates issued. There are no intermediate targets for this target.

This target also did not change from the previous year as it focused on core activities of the company. By year-end 2024 there was an increase of 35% (CAGR 2023-24). The growth is almost entirely related to digital signatures, which account for 97% of total services.

These targets are in line with the Sustainable Development Goals, particularly Goal no. 9 "Industry, Innovation and Infrastructure".

**[MDR-T, 80 h]:** Consumers and/or end users were not involved in the target-setting process.

**[MDR-T, 80 j]:** Plan targets are monitored periodically by the Chief Enterprise and Innovative Solutions Office. Progress is in line with what was initially planned, and the company is taking behaviors and actions that will further the achievement of the goal.

**[41], [MDR-T, 81 b i, ii]:** In order to monitor and track the effectiveness of its policies and actions put in place with regard to consumer and end-user IROs, the TIM Group adopts monitoring processes in accordance with standards and best practices, based on performance measurement systems. Specifically, the Company:

- in terms of aspects relating to network threats, the Group tracks and mitigates these threats;
- in terms of aspects relating to consumers' personal security, the Group tracks risks related to cybercrime, cyberbullying and inappropriate content;
- in terms of aspects relating to the social inclusion of consumers, the Group tracks the ability of consumers to access the benefits of modern and high-performance connectivity, even in challenging environments.

**[41 a, b, c]:** TIM has undertaken various initiatives to set and track revenue targets in the Cloud, IoT, Security and Digital Identity Services sectors, which have required the direct involvement of consumers and/or end users. In particular, as part of the double materiality process, end consumers have identified issues relating to cybersecurity and digital inclusion as material. This process required consumer involvement through questionnaires and/or interviews, and their preferences were critical in defining the relevant IROs but also the targets that the Domestic BU sets for itself. Thanks to the ongoing tracking of its own performance and the "Customer Satisfaction Index", TIM has been able to better contextualize the significant growth recorded in Cloud, IoT and Security services revenues and in Digital Identity services revenues and to guarantee continuous improvement in its performance.

## 4. GOVERNANCE DISCLOSURES

### Business conduct [ESRS G1]

#### Impact, risk, and opportunity management

##### Disclosure Requirement G1-1 – Business conduct policies and corporate culture

[7], [MDR-P, 65 a]: IROs that emerged as significant from the analysis of dual relevance to the topic of "Business Conduct" are addressed within the "Code of Ethics and Conduct," the "231 Organizational Model," the "Anti-Corruption Policy," the "Tax Strategy," the "Report on TIM Group's Remuneration Policy and Compensation Paid," and the "TIM Group Artificial Intelligence Guidelines". All documents are linked to the following material impacts, risks and opportunities that emerged from the double materiality assessment:

##### Positive impacts

- *"Involving stakeholders in strategic initiatives helps create long-term value for customers and the supply chain";*
- *"Incentive mechanisms that encourage employees to adopt sustainable practices promote a culture of responsibility towards environmental and social impact".*

##### Negative impact

- *"The inability of the company or supply chain to conduct a responsible business, which responds to ethical social demands and transparent business practices, may limit competition and consumers' informed choices".*

##### Risks

- *"Potential non-compliance with anti-bribery regulations in the conduct of business increases the likelihood of legal liability and financial sanctions, as well as reputational damage";*
- *"The inability to effectively involve suppliers in the reduction of emissions can cause the failure to achieve the climate objectives, with an impact on economic and financial results as well as reputational damage";*
- *"Failure to adapt to regulatory developments in the use of generative AI can cause reputational damage and sanctions and can harm the economic sustainability of the company".*

##### Opportunities

- *"Strong ethical practices and transparent codes of conduct can improve brand reputation, attract ethical investors, and improve customer relationships";*
- *"Voluntary compliance with the Revenue Agency can bring benefits in terms of reputation and operational management".*

The "Code of Ethics and Conduct" guides TIM's actions in carrying out its business, in the belief that a common vision of ethics in the daily conduct of business is the essential prerequisite for responsible and sustainable growth. Specifically, the document includes:

- the distinguishing values of the Group's culture;
- the rules of ethical behavior for people in the Group and the guidelines for the conduct to be pursued in dealings with third parties;
- the objectives and good practices relating to sustainability and social responsibility, in order to conduct business activities in a way that safeguards the various aspects of the environmental, social and governance-related affairs of the Group;
- the methods of complying with the Code through the description of the commitment of corporate boards and management teams, as well as the approach to managing violations, whistleblowing, and the methods of disseminating and adopting of the document.

In relation to the IRO material for the topic "Business Conduct", TIM emphasizes its commitment to:

- managing relationships with all Third Parties in a responsible, transparent and correct manner by condemning the use of any illegal or incorrect behavior and constantly promoting compliance with applicable legislation;
- conducting activities in accordance with a "zero tolerance" to corruption by adopting the voluntary UNI ISO 37001 "Anti-bribery Management Systems" standard;
- believing in free and fair competition in the interests of all market operators, consumers and stakeholders in general, by avoiding prohibited, collusive, restrictive and abusive behavior and ensuring compliance with relevant regulations;
- not allowing the pursuit of personal or third party interests to the detriment of business interests by asking the Group's personnel to report the onset of potential conflict situations;
- selecting our suppliers in accordance with principles of fairness and impartiality and on the basis of rules established to verify their professionalism, integrity and sustainability, in line with applicable regulations;

- complying with applicable regulations on Artificial Intelligence and in complying with the best guidelines on the subject at national and international levels, fully aware that using this technology undoubtedly represents a factor of development and innovation, but at the same time may have ethical implications if not regulated.

The “**231 Organizational Model**” aims to prevent crimes being committed in the interests of the undertaking which may entail administrative liability. The model has the following purposes:

- to prevent and limit the risks associated with business activities, with particular regard to any illegal conduct that may result in liability on the part of the Company and consequent sanctions;
- to raise awareness of those operating in the name and on behalf of the Company in high-risk activities that the committing any unlawful conduct may result in criminal and administrative sanctions against them and the Company;
- to combat illegal behavior of any kind and regardless of purpose, since they violate applicable legislation laws are in any case contrary to the ethical principles to which the Company adheres;
- to raise awareness among the Company's employees and applicable third parties of the behavior required under the 231 Organizational Model to prevent the risk of committing crimes.

In accordance with best practice, TIM's 231 Organizational Model has been set out from a cross-compliance perspective, taking into account the adoption of the specific control models developed by the Company.

The “**Anti-Corruption Policy**” has the following main objectives:

- to manage the risk of corruption in accordance with a “zero tolerance” approach;
- to guarantee compliance with the anti-corruption laws;
- to protect the Company from the harmful consequences of non-compliance with the anti-bribery laws applicable to the TIM Group, including in terms of reputation and image;
- to encourage the use of instruments for the reporting of acts of Corruption, including those of third parties doing business with the Company;
- to strengthen awareness of the rules in order to ensure the active, responsible involvement of all addressees in the pursuit of the Anti-corruption Management System's objectives.

The “**Tax Strategy**” policy lays down the general objectives and the direction adopted by TIM in managing taxation. The Strategy has the following purposes:

- to disseminate the values and codes of conduct in tax matters to top management and to all the employees involved;
- to develop and promote ongoing relationships with the Tax Authorities in a professional, transparent and timely manner;
- to set out TIM's tax risk tolerance (propensity for tax risk) with a view to promptly resolving potential disputes while at the same time reserving the right not to adhere to the positions of the Tax Authorities when the Company's grounds appear to be adequately supported;
- to set out appropriate control and monitoring tools to achieve the selected level of risk;
- to operate in compliance with the tax laws and regulations of the countries in which it is present by managing the monitoring of legislative developments, application management, information and in-house training;
- to continuously monitor business activities and processes so as to ensure compliance with the standards required by current tax regulations by means of involving all bodies and functions responsible for internal and external controls;
- to adapt – based on the needs and criteria of rationality and appropriateness – the organizational structures, business systems and processes affected by legislative changes.

The **TIM Group's Report on the remuneration policy and compensation paid** supports the achievement of the objectives set out in the Strategic Plan and a focus on the different business sectors, promoting the alignment of management interests with the goals of creating value for shareholders and a sustainable success for the company in the long term. The remuneration structure provides for a balance between the monetary component of remuneration (fixed and variable remuneration) and the enhancement of the non-monetary component (benefits and welfare), with a view to pursuing sustainable results over time.

The inclusion of ESG components in the incentive system is aimed at promoting sustainable behavior within the undertaking and aligning management interests with the Plan objectives.

The “**Artificial Intelligence Guidelines**” define the regulatory framework for the development, use and purchase of Artificial Intelligence Systems by TIM. This ensures that ethical principles translate into day-to-day operations in the interest of the Company and all its Stakeholders.

In particular, the Guidelines lay down:

- the ethical principles giving rise to the development, use and purchase of AI Systems within the TIM Group;
- the external and internal regulatory framework relating to AI Systems;
- the organizational and governance structure for managing AI issues, which sets out behavioral guidelines in relation to the development, use and purchase of AI Systems.



[7], [MDR-P, 65 b]: The Code of Ethics and Conduct applies to all people in the Group, with particular reference to the members of the Corporate Boards, management, employees of all Group Companies, external collaborators, and, where required by the company's procedural system, to third parties in business relationships with the Group.

TIM's 231 Organizational Model applies to: personnel holding representative, administrative and management functions within the Company; members of the Corporate, Management and Supervisory Bodies; all employees; and all third parties acting in the name and on behalf of the Company. The Model is to be considered as a guideline to which the Subsidiaries adhere in structuring their own Organization, Management and Control Model, without prejudice to the specifics of the activities of interest that will necessarily have to be represented and compliance with the applicable regulations on the liability, including criminal liability, of legal persons and companies in the countries where they are based or operate, as well as a suitable internal control and risk management system that provides for appropriate safeguards to verify its practical implementation.

The Anti-Corruption Policy applies to TIM S.p.A. and to members of the corporate bodies, employees and external staff engaging in various capacities with the Company. The Policy applies to Subsidiaries of the TIM Group and to the TIM Foundation: listed domestic and foreign companies and companies certified in accordance with UNI EN ISO 37001 may transpose the Policy by defining their own policies in compliance with the principles set out therein.

The Tax Strategy Policy applies to all companies in the TIM Group; Brazil has adopted its own policy based on the contents of the Group's policy.

The Report on remuneration policy and remuneration paid applies to the TIM Group.

The TIM Group's Artificial Intelligence Guidelines apply to: the members of the Corporate Bodies; management; employees of all Group companies; external workers; and, where required by the company's procedures, third parties in business relationships with the Group.

[7], [MDR-P, 65 c]: The adoption of the Code of Conduct was decided by resolution of the TIM Board of Directors on March 15, 2023. A periodic review of the Code is also ensured to implement any necessary updates.

The adoption of the 231 Organizational Model was also ordered by resolution of the Group's Board of Directors, after receiving the opinion of the Supervisory Body.

The Group's Anti-Corruption Policy was approved by the Board of Directors, after a prior review by the Control and Risks Committee. Within the company organization, the Compliance Department is in charge of overseeing the implementation and monitoring of the Anti-Bribery Management System and, more in general, the compliance of the Anti-Bribery Management System (ABMS) with ISO 37001:2016 requirements.

The Tax Strategy is approved by the Group's Board of Directors, following preliminary assessment by the Control and Risk Committee, and is promptly updated in the event of changes at the strategic and/or operational level.

The TIM Group's Report on the compensation policy and compensation paid was prepared by resolution of TIM's Board of Directors on March 2, 2022, based on the findings of the Nomination and Remuneration Committee.

The TIM Group's Artificial Intelligence Guidelines have been approved by the Board of Directors, which ensures that they are in line with TIM's strategy.

[7], [MDR-P, 65 d]: The Code of Ethics and Conduct is in line with the United Nations Global Compact with which TIM complies, while TIM gives effect to Italian Legislative Decree no. 231/2001 by means of the Organizational Model 231.

With the Anti-Corruption Policy, TIM undertakes to comply with the ISO 37001:2016 "Anti-Bribery Management Systems" standard published on October 15, 2016 by the International Organization for Standardization.

The Tax Strategy document makes reference to the OECD report "Co-operative Compliance - A Framework: From Enhanced Relationship to Co-operative Compliance"; OECD GUIDELINES "Building better tax control frameworks".

The TIM Group's Guidelines on Artificial Intelligence take into account the following external regulations:

- Charter of Fundamental Rights of the European Union;
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of June 13, 2024 laying down harmonized rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act - AI Act) (Text with EEA relevance);
- European Commission Guideline of November 25, 2021 Ethics By Design and Ethics of Use Approaches for Artificial Intelligence;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR);
- Directive 2002/58/EC of the European Parliament and of the Council of July 12, 2002 concerning the processing of personal data and the protection of privacy (e-Privacy Directive);
- UNESCO "Recommendation on the Ethics of Artificial Intelligence";
- GSMA "The AI Ethics Playbook Implementing ethical principles into everyday business";



- Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law.

[7], [MDR-P, 65 e]: The Group Policies take into account aspects identified as fundamental and priority by analyses conducted internally and with external stakeholders. These aspects are strongly linked to the operations of the TIM Group Companies.

[7], [MDR-P, 65 f]: To ensure the contents of the Policies are shared, the TIM Group makes documents available to its stakeholders on its corporate intranet and on the Group's company website, in compliance with "least privilege" and "need to know" principles. Where appropriate, for relations with third parties, specific contractual clauses will be added relating to the acceptance and/or compliance with some of the policies, such as the Code of Ethics.

[9]: Issues relating to business conduct are periodically discussed and reviewed by the Group's Board of Directors and Supervisory Bodies in order to provide appropriate guidance. With this in mind, all policies mentioned in this topic – namely the Code of Ethics and Conduct, the 231 Organizational Model, the Anti-Corruption Policy, the Tax Strategy Policy and the TIM Group's Report on the remuneration policy and compensation paid – have been established by specific resolution of the Board of Directors.

The Group also promotes its business culture among stakeholders by publishing its policies on the corporate website and on the Group's intranet site and by encouraging specific sharing and training instances.

[10 a]: TIM has a Whistleblowing Portal through which all relevant stakeholders can report concerns regarding conduct that is illegal or in breach of the Code Of Business Conduct. Specifically, the following may submit whistleblowing reports: employees, former employees and candidates for employment; partners; customers; partners; suppliers (including contractors/subcontractors); self-employed workers or those in a collaborative relationship with the Group; freelancers; consultants; agents and intermediaries; volunteers and trainees (paid or unpaid); and anyone who has a legitimate interest in the Group's business.

[10 c]: The TIM Group makes reporting channels available to allow you to transmit, even anonymously, a report of your own or a third party, after having read the "Privacy Policy" published on the "Whistleblowing" page. On the above-mentioned sites and intranet pages dedicated to Whistleblowing, information is available on the conditions for making a Report. A FAQ section is also available with answers to the most frequently asked questions useful to ensure Reports are sent correctly.

In Italy, a report may be sent via:

- the Whistleblowing Portal, also present in TIM S.A., suitable for guaranteeing the confidentiality of the identity of the whistleblower through the use of secure protocols and encryption tools. After entering information, the Portal provides a Unique Identifier Code, which can then be used to check the processing status and to send and receive communications (even anonymously);
- voicemail at the Toll-Free Number 800664411;
- ordinary mail to the Supervisory Body of TIM or the TIM Group company concerned, addressed to the company's registered office. Whoever receives a report, in any form (written or oral), must send it promptly, and in any case within 7 days of receipt, through the above-mentioned channels to the Supervisory Body concerned, also through the TIM Audit Department, informing the reporting person at the same time (if known) that the report has been sent, and guaranteeing absolute confidentiality.

[10 e]: All reports received through the Whistleblowing Portal, including those relating to cases of bribery and corruption, are initially analyzed by the Audit Department in view of investigations potentially being instigated under the Whistleblowing Procedure. In addition, TIM has in place an Internal Control and Risk Management System (ICRMS) consisting of all organizational structures, rules and business procedures to ensure an effective and effective process to identify, measure, manage and monitor primary risks, which also includes adequate information flows aimed at facilitating the coordination of information between the various actors of the ICRMS.

[10 g]: The TIM Group delivers specific training and information sessions to its employees to ensure adequate dissemination of its business culture. In particular, the training touched on the following key topics:

- **Whistleblowing:** employee training on using the reporting system and whistleblower protection;
- **Anti-Corruption:** periodic employee training on the main regulations, the Group's Anti-Corruption Policy and related implementation procedures to enhance knowledge and raise awareness of the matter;
- **Corporate governance and Code of Ethics:** training delivered to all employees with the aims of disseminating the values and principles laid down in the Code of Ethics and understanding their ethical and operational responsibilities. Managers, on the other hand, follow specific pathways to strengthen ethical leadership and responsible management.

The modes of use include dedicated training courses that take place on specific days, videos posted on the company intranet that allow, instead, the course to be enjoyed in streaming mode, periodic newsletters. This is complemented by day conferences on compliance and values in the Code of Ethics and Conduct and dedicated Webinars.

[10 h]: The functions within the company that are most at risk of bribery and corruption are identified according to a risk-based approach. Specifically, this concerns "Personnel in a Significant Position", (i.e. figures exposed to risk, as they are in contact with third parties, such as public entities or private entities, other than customers/end users of the products/services sold by TIM). Personnel in a Significant Position include:

- first-level departmental managers;

- second-level departmental managers with powers of signature;
- personnel with powers of signature, where their responsibility is enshrined in the organization chart, in particular belonging to the following functions: Procurement & Logistics; Chief Financial Office; Chief Human Resources & Organization Office; Judicial Authority Services and Corporate Security & Fraud Management (Chief Public Affairs, Security and International Business Office);
- personnel with powers of signature, even where their responsibility is not enshrined in the organization chart, for the Chief Enterprise and Innovative Solutions Office function;
- individuals in the corporate function who work in the area of regulation and institutional relationships and who are mandated by the Company to maintain the relationships defined above;

Third parties that may present potential risks are divided into “Significant Relationships” (according to the nature of the relationship) and “Significant Third Parties” (according to the characteristics of the counterparty). Significant Relationships include relationships with public bodies, customers and suppliers, and private entities. Significant Third Parties include beneficiaries of sponsorships/ contributions; consultants, brokers, business partners and external workers; suppliers of goods and services; participants in extraordinary transactions (mergers, acquisitions); partners in joint ventures; recruitment candidates (evaluated for reputation and conflicts of interest).

Finally, TIM has identified the main business areas at risk of corruption. These include procurement, investments, budget, sales, logistics, human resources, finance and taxation, as well as the area pertaining to the control-governance environment in general (in particular management of gifts, representation fees, events and sponsorships, gratuities, membership fees, relations with Institutions/Authorities, authorizations and concessions, judicial and arbitration proceedings, occupation health and safety obligations, environmental protection obligations, and top management operations).

In TIM S.A., the result of the annual Anti-Corruption Risk Assessment identifies the relations, third parties, roles and activities with a medium to high level of exposure to corruption risk. In general, the assessment of the risk of corruption depends on:

- the type or nature of the relationship (sensitive relationships);
- the characteristics of third parties or the activities they carry out (sensitive third parties);
- the role played by the employee (sensitive roles);
- the activities considered sensitive.

Following the risk assessment process, TIM S.A. has identified the following sensitive activities: agreements; judicial, administrative, and arbitration proceedings; authorizations and licenses; relations with public officials, institutions, authorities, trade unions and associations; receiving and/or offering goods, services and/or invitations to events as representation fees; events; commercial and institutional sponsorships; donations to non-profit organizations; subsidized loans and financing; purchasing of goods and services; sales of goods and services; hiring of employees; management of employees' variable compensation incentives; health, safety and environment; investments; business partners.

[MDR-A 68 a, b, c, e], [MDR-A, 69 a, b, c]: In implementing the aspects related to IROs that emerged from the double materiality analysis linked to the identified policies on “business conduct”, which provide the framework for the coherent and informed management of business activities, the Group implements actions that enable the management of aspects related to:

1. **Business culture and active and passive bribery**
2. **Management of relationships with suppliers including payment practices**

The actions, applied in both Italy and Brazil, involve internal operations and the value chain and aim to ensure transparency and reduce risks related to anti-corruption and regulatory compliance. Where available, financial resources are also reported in terms of operating expenses (OpEx) and material capital expenses (CapEx). These particularly include:

### 1. Business culture and active and passive bribery

- **Training on Anti-corruption:** the activity, which covers the policies and related implementation procedures, is aimed at all employees of TIM S.p.A. and subsidiaries in the Domestic perimeter. Anti-corruption policies are accessible through company portals and internal communication channels.
- **Anti-Corruption Management System (EMS):** The TIM Group has adopted an Anti-Corruption Management System aimed at preventing, detecting and managing corruption risks. This system, also required of subsidiaries, includes due diligence activities, conflict of interest analysis, reputational audits, and internal controls over risk processes. The implementation of the system complies with the ISO 37001:2016 standard, which provides guidance for establishing, implementing, and improving the anti-corruption system. The system is certified for Olivetti, Telecontact Center, TI Trust Technology, TI Sparkle and TIM S.A. It involves employees, corporate bodies, collaborators, suppliers and business partners through audits and reputational reviews. TIM S.A. also adopts the “Integrity Program”, which establishes rules and actions to ensure compliance with Brazilian anti-corruption legislation, preventing and mitigating the risks of corruption and payment of bribes. For TIM S.p.A., the OpEx amounted to €178.5k.
- **231 Organizational model:** TIM continuously updates its 231 Organizational Model for the prevention of corporate crimes. Version 7.4, adopted on July 31, 2024, includes regulatory updates relating to bid rigging, fraudulent transfers, copyright, and preventive measures. The internal control system provides for constant monitoring through analysis of information flows covered by the 231 Model, as well as “red flag” reports. Findings are reported directly to the Supervisory Body. The Model is adopted by TIM S.p.A. and the

Group's main subsidiaries, covering all corporate functions, ensuring they comply with compliance and anti-corruption regulations. For TIM S.p.A., the OpEx amounted to €24.7k.

- **Tax Control Framework:** TIM has adopted a structured tax risk management system (Tax Control Framework) to ensure compliance with tax regulations and prevent avoidance and litigation risks. The company takes a prudent and transparent line of interpretation, maintaining a constant dialogue with the Italian Tax Agency to avoid interpretative uncertainties. The framework provides for internal monitoring processes to ensure the correct application of tax regulations and minimize reputational and financial risks. The company monitors tax activities nationwide, ensuring regulatory compliance and tax risk prevention. The framework involves the company's financial and administrative functions, with constant discussion with tax authorities.
- **Tax Risk Awareness:** the Tax Office function provides ongoing support to business functions involved in financial management to ensure that every decision is aligned with the current regulatory framework, reducing the risk of non-compliance, and improving the transparency of financial transactions.
- **Artificial Intelligence Guidelines:** The company has adopted Artificial Intelligence Guidelines defining the regulatory framework for the development, use, and procurement of Artificial Intelligence Systems by translating ethical principles into actions in the interest of the Company and Stakeholders. Constant monitoring of guidelines ensures regulatory compliance, with risk assessment activities and continuous monitoring to incorporate any regulatory changes.

Regulatory tools, as well as risk assessment and monitoring activities, are also continuously carried out to reflect any regulatory changes.

Particularly with regard to the corporate administrative responsibility, the 231 Organizational Model of TIM S.p.A. was updated and adopted by the Company's Board of Directors on July 31, 2024. This new version incorporates regulatory changes regarding bid rigging (Law no. 137, of October 9, 2023), fraudulent transfers (Law no. 56, of April 29, 2024), copyright (Law no. 93, of July 14, 2023), sale of industrial products bearing false marks (Law no. 206, of December 27, 2023) and prohibitive protective measures (Law no. 17, of March 3, 2023 17).

## 2. Management of relationships with suppliers including payment practices

- **Joint Alliance for Corporate Social Responsibility (JAC):** TIM is among the founding members of the alliance of telecom operators to promote the application of sustainability principles along the supply chain. In carrying out this initiative, suppliers in the highest risk classes are audited to identify any non-compliance with the requisite standards and to define corrective action plans.
- **Supplier management**
  - **Payment terms.** To ensure a balance between TIM's operational needs and the economic stability of suppliers, standard payment terms are defined within the contracts for each Merchandise Group that take into account market criteria and business needs.
  - **Reverse Factoring.** TIM offers suppliers this financial option that gives them a choice of whether to advance the collection of receivables through contracted banking institutions to avoid liquidity risks, or to wait until the natural expiration of contract terms.

Supplier relationship management and payment management initiatives are applied within the TIM S.p.A. perimeter. These actions are of an ongoing nature.

**[MDR-A, 68 d]:** With respect to the negative impact identified during the double materiality analysis, "The inability of the company or supply chain to conduct a responsible business, which responds to ethical social demands and transparent business practices, may limit competition and consumers' informed choices", the Group has adopted an Anti-Bribery Management System (ISO 37001) that provides for due diligence of suppliers and audits on at-risk processes. Meanwhile, the 231 Organizational Model and the Code of Ethics ensure the monitoring of at-risk processes and the promotion of values such as transparency and compliance in business processes.

## Disclosure Requirement G1-2 - Management of relationships with suppliers

**[14]:** The TIM Group Product and Service Purchasing Policy governs the objectives and general principles of the purchasing process, including the stages of payment to suppliers. Specifically, payment to suppliers occurs after the service is completed or the products/services have been delivered. At this point, the User Business Function records the entry of goods in the SAP system by referring to the purchase order issued to the supplier. This entry formalizes the acceptance of the supply/performance, authorizing the supplier to issue the invoice, and allowing payment within the terms stipulated in the contract.

It is the responsibility of the User Function to notify the supplier without delay via the supplier portal or by email of the amount of the goods entry, to prevent the supplier from issuing invoices for amounts other than those reported. The Accounting Operations Function within the Chief Financial Office registers the invoice and, after checking for approval, initiates the payment process.

TIM's business practices designed to avoid or minimize the effects of supply chain disruptions include the following operational measures:

- assessment about supply diversification to mitigate risks related to external factors;

- proactive supplier management, which includes continuous performance evaluation, conducting audit plans, and establishing shared contingency plans to strengthen supply chain resilience;
- definition of business continuity and crisis management plans to deal with any disruptions, including the use of alternative sources of supply or temporary reorganization of operations to minimize financial and operational impacts;
- adoption of sustainable and responsible practices within the supply chain to reduce reputational risk and build stable and lasting relationships with suppliers;
- ongoing training of purchasing officers to make them aware of supply chain risks and direct them to best management practices.

Within the Domestic BU, all suppliers operating in the geographic areas of Asia, Central and South America, North Africa, and Eastern Europe with order amounts greater than or equal to €250k and, more generally, all those with order amounts greater than €500k are considered to be at ESG risk. These suppliers are subjected to an ESG questionnaire with more than 30 questions that also includes the following certifications:

- SA8000
- ISO 45001 “Occupational health and safety management systems”
- ISO 37001 “Management Systems for the Prevention of Corruption”
- ISO 30415 “Diversity & Inclusion”
- confidential procedure for reporting behavior that does not comply with the principles of the Code of Ethics

Access to the register requires passing a minimum threshold, which is binding for membership.

**[15 a]:** The TIM Group to prevent sustainability risks and impacts related to the supply chain and purchased products and services, implements the following activities with the aim of reducing emissions aimed at achieving climate targets:

- encourages and engages suppliers to develop a proactive approach toward sustainable development;
- works with TIM suppliers to continuously improve collective sustainability performance;
- incorporates sustainability into the tender documents, ensuring that they are a proportionate part of the evaluation criteria for contracts with a significant impact, where applicable;
- builds and develops practical tools to increase awareness, knowledge and understanding of relevant sustainability issues;
- promotes solutions that allow significant reductions in greenhouse gas emissions in the supply chain;
- works with suppliers/partners to reduce the risk of security incidents in all activities carried out with the ultimate aim of eliminating such incidents;
- promotes fair labor practices, including non-discrimination;
- verifies through Audits the level of respect for human rights in the production facilities of key suppliers located in areas with significant level of socio-environmental risk.

TIM also evaluates its suppliers based on their environmental and social performance. This occurs both during the acquisition phase, through the qualification and listing process, and during the ongoing relationship with TIM. Evaluation and monitoring of ESG performance is done through the Open-es platform, which also offers training, development and capacity-building tools on sustainability issues. The platform also encourages the exchange of best practices among suppliers within the community. TIM has set a goal of a 5% YoY increase in subscribers to the platform. At the end of 2024, the number of subscribers is more than 1,200 compared with about 1,000 in 2023.

In addition, TIM participates in the **Joint Alliance for CSR (JAC)** a joint initiative among telecommunications operators, of which the company is also a founding member, whose main objective is to verify, assess about the application of corporate social responsibility principles in the production centers of the main multinational suppliers in the industry. Through the JAC, audits are also conducted on the suppliers with higher CSR risk with specialized third-party companies. The audit, if successful, verifies the maintenance of the supplier's level of performance against the required standards over time; in the case of non-conformity, the audit instead commits the supplier to resolve the finding with a Corrective Action Plan (CAP) within agreed deadlines. During 2024, through the JAC, 139 audits were conducted that found a total of 675 non-compliances. TIM conducted a total of 11 audits during the year.

**[15 b]:** Confirmation of suppliers' inclusion in the TIM Group's register is subject to a pre-contract qualification, aimed at assessing their economic-financial, technical-organizational, and sustainability characteristics.

In 2024, 100% of newly qualified suppliers qualified by the **Domestic BU** undertook in writing in their own name and on behalf of any authorized subcontractors, collaborators, and employees, to comply with the principles of conduct of the Group's Code of Ethics and Conduct. In 2024, 217 suppliers were qualified, of which more than 18% were assessed by questionnaire on socio-environmental issues.

In Brazil, **TIM S.A.** has implemented a socio-environmental qualification process to reduce the risks associated with critical supplier activities. This process is part of selecting new providers and upgrading existing ones. During this phase, the social, environmental, health, and safety aspects of suppliers' activities are assessed. In 2024, 298 suppliers were evaluated, accounting for 14% of the total of 2,176 suppliers undergoing the

qualification process. Of these, 93 are still under evaluation, 123 have been approved to provide services with low or medium socio-environmental risk, and 82 have been excluded without the need for improvement plans.

### Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery

**[18 a]:** To prevent, identify and address situations where acts of active and passive corruption occur TIM S.p.A. has implemented an Anti-Corruption Management System (EMS) in accordance with ISO 37001:2016, applicable to the Company, members of corporate bodies, employees, and collaborators. The UNI ISO 37001:2016 certification, obtained in 2019, was reaffirmed until October 13, 2025.

Subsidiaries are required to adopt EMS or equivalent safeguards based on corruption risks. In addition, the following are certified according to the ISO 37001 standard: TIM S.A. (March 15, 2021), Olivetti S.p.A. (May 11, 2022), TI Trust Technology S.r.l (June 6, 2022) Telecontact S.p.A. (July 21, 2022) and TI Sparkle S.p.A. (December 15, 2023).

Each year, TIM defines an EMS verification and monitoring plan, submitted for evaluation by the external Certifying Body to maintain certification.

In 2024, downstream of network separation, TIM S.p.A. has assessed about 100 business units that fall under the corruption risk assessment, in accordance with UNI ISO 37001:2016 certification. To combat corruption, it is essential to pay special attention to and constantly monitor certain sensitive activities. TIM S.p.A. then carried out a risk assessment, analyzing significant risk scenarios related to both active and passive bribery to both public and private entities. The Anti-Corruption Risk Assessment has identified areas and job positions at risk of corruption, as well as Third Parties and relationships that may present risk profiles in relation to anti-corruption regulations.

The Company has also implemented an IT system to support Third Party Risk Assessment, which is currently operational for suppliers and business and consumer business partners in the indirect sales network, through Anti-corruption Due Diligence activities.

In Brazil, TIM S.A. adopts a Corporate Risk Management (ERM) process according to the Corporate Risk Management Policy to identify and manage risks that may compromise business objectives and to take mitigation measures. The Audit and Risk Committee is involved in the process of identifying and assessing risks, including corruption risks, and the respective mitigation controls and continuous monitoring of sensitive activities. In Brazil, the Risk & Compliance area conducts an annual risk assessment of Sensitive Activities, linking them to material processes, responsible areas and functions, stakeholders involved, risk scenarios, and mapped controls.

The objective is to establish the basis for the Anti-Corruption Management System (AMS) through the identification and assessment of key corruption risks and the controls implemented to mitigate them.

In assessing corruption risks, factors such as the location and sectors of activities, the nature and complexity of activities, third parties involved, and relationships are considered. TIM S.A. identifies foreseeable corruption risks, maps the processes at risk, documents the methodologies used, and assesses the adequacy and effectiveness of existing controls to mitigate these risks.

The Company defines the criteria for assessing corruption risk, considering TIM's policies and objectives. This assessment is performed and verified by the Risk & Compliance Function in the context of risk assessment, both periodically (to adequately assess changes and new information within established deadlines and timeframes) and in the event of significant changes in TIM S.A.'s structure or activities. To combat corruption, it is essential to pay special attention to and constantly monitor certain activities that are considered sensitive. The annual Anti-Corruption Risk Assessment activity identifies relationships, third parties, roles, and activities with a medium- to high-level of exposure to corruption risk.

**[18 b]:** Reports of possible cases of active or passive corruption are received by the Supervisory Board of TIM or the TIM Group company concerned. This body, with the support of TIM's Audit Function, conducts an investigation by gathering the necessary information from the structures involved. These bodies are independent of the management that deals with the prevention and detection of corruption. After investigation and reporting to the Supervisory Board, TIM's Audit Function notifies the Compliance Function of any findings of suspected fraud with potential anti-corruption impacts. If recommendations for corrective actions emerge from the analyses, the management of the audited areas/processes must: define a corrective action plan to resolve critical issues, ensure its implementation within the stipulated time frame, report to the Audit Function on the status of implementation of actions. The Supervisory Board monitors the progress of corrective actions through periodic information provided by the Audit Function.

**[18 c]:** The TIM Board of Directors (BoD) approves the Anti-Corruption Policy, Code of Ethics and Conduct, 231 Organizational Model, and Compliance Management Activity Plan related to the Anti-Corruption Management System (AMS), receiving updates on the progress of the latter.

Likewise, the Boards of Directors of domestic subsidiaries approve the Group's Code of Ethics and Conduct, its 231 Organizational Model, the EMS for ISO 37001-certified companies, and the Anti-Corruption Policy.

The Board of Directors of TIM S.A. approves the Company's Code of Ethics and Conduct, a foreign version of the 231 Organizational Model in accordance with local regulations, and the Anti-Corruption Management System in accordance with ISO 37001. Finally, the Boards of Directors of the main foreign companies of the Sparkle Group adopt an international version of the 231 Organizational Model, in line with relevant local regulations.

**[20]:** The Anti-Corruption Policy, Code of Ethics and Conduct and 231 Organizational Model (General Part) are available on the corporate website, corporate intranet, and Group Supplier Portal, together with the Anti-Corruption Manifesto.

Contracts with business partners include an "anti-corruption clause" that requires acknowledgement of the Code of Ethics and Conduct, the Anti-Corruption Policy, and the 231 Organizational Model. Order Vouchers are issued with the acceptance clause of these documents.



In addition, since 2023 a video interview has been made available to third parties regarding the Code of Ethics and Conduct, the 231 Organizational Model and the Anti-Corruption Policy. In 2024, this was viewed by 34 business and consumer business partners from the indirect sales network.

TIM S.A. does not provide appropriate communication to third parties about its Anti-Corruption Policies, however, all suppliers are informed about the Anti-Corruption Policies at the time they sign a Service Supply Agreement with TIM S.A.

**[21 a, b, c]:** TIM's Anti-Bribery Policy provides for a Due Diligence check for resources who hold or are destined to hold roles identified as Significant Positions (job positions with non-low corruption risk) according to the Internal Guidelines.

This verification includes various aspects, including: The reputation and reliability of resources; The presence of any conflicts of interest, such as economic and financial interests in Third Party activities; relations with the public administration; the organizational position and the conferral of powers/proxies; participation in training initiatives on anti-corruption, the 231 Organizational Model and the Code of Ethics and Conduct.

The same Policy specifies that TIM conducts training and information activities to corporate bodies and employees, on the application of the 231 Organizational Model, anti-corruption issues, the Anti-Corruption Policy, implementation procedures, the Anti-Corruption Management System (AMS), and relevant regulations. The Anti-Corruption Policy and implementation procedures are communicated to respective stakeholders through publication on specific web portals or through dedicated communication initiatives.

The Compliance Department's Activity Plan includes Compliance Management Training and Communication initiatives (document for internal use of the Compliance Department). This document, approved by the BoD, provides, with regard to Training and Communication, different types of initiatives tailored to the target audience.

In particular, there are initiatives aimed at specific targets (such as managers, specific corporate functions, new hires, etc.) and mass awareness initiatives aimed at the entire corporate population. As a result, 100% of risk functions are covered by anti-corruption training programs. In 2024, 38,439 hours of anti-corruption training were provided. In addition, the Compliance Department has delivered an induction on compliance issues to the Chairman and the Sustainability Committee.

## G1-Metrics and targets

### Disclosure Requirement G1-4 – Incidents of corruption or bribery

**[24 a, b]:** No cases of corruption or bribery were identified in 2024. The Rome Public Prosecutor's Office is currently investigating alleged bribery between private individuals who reported to a former Group executive. The Company declares that it had no involvement in the incident and that it is an injured party.

The Company has taken action against those involved, both employees and external counterparties.

The TIM Board of Directors, having taken note of investigation by the Rome Public Prosecutor's Office into alleged bribery between private individuals, has declared that it will work fully with the investigating authorities, also in terms of identifying any liability against the Group, which had no involvement in the incident and should be regarded as an injured party. In this context, the Company had already launched specific auditing activities in the light of press rumors about the incident (referred to as the "Sogei" affair).

In addition to the above, further steps have been taken with the involvement of the Supervisory Bodies and management.

In the past 3 years, TIM S.p.A. has taken specific adjustment measures in its relations with suppliers for situations attributable to corruption.

### Disclosure Requirement G1-6 - Payment practices

**[33 a, d]:** In line with company procedures, invoices are paid within the contractual terms, except for residual and insignificant cases, such as invoices under dispute for which payment approval is suspended or cases subject to different payment practices. Average payment term in days is calculated as a weighted average based on the volume of trade payables, separated by payables covered by finance agreements and payables not covered by such agreements.

**[33 b]:** TIM's standard contractual payment terms provide for payment against invoice at 120 days for 95% of the commodity groups classified in the company, while 60 or 90 days apply for the remaining 5% of commodity groups. There are additional cases that may deviate from standard payment terms, such as to specific framework agreements or lease purchases.

**[33 c]:** For TIM S.p.A., the number of pending disputes with suppliers for non-payment is 14<sup>22</sup>.

<sup>22</sup> Figure subject to possible change given the recent migration to a later release of the software system used by legal functions still undergoing assessment and verification.

## 5. NETCO PERFORMANCE INFORMATION

### Introduction

In line with what is set out in the section “The Sale of NetCo” of the Report on Operations, to which reference is made for more details, the Board of Directors of TIM S.p.A. on November 3, 4 and 5, 2023, reviewed and approved the binding offer submitted by Kohlberg Kravis Roberts & Co. L.P. (“KKR”) for the acquisition of the entire share capital of FiberCop S.p.A. following the contribution by TIM S.p.A. of a business unit consisting of the activities related to the primary network, the wholesale business and the entire stake in the subsidiary Telenergia S.r.l. (the “NetCo Branch”).

The transaction was governed by a transaction agreement, signed on November 6, 2023, between TIM S.p.A., Optics Bidco S.p.A., Teemo Bidco S.à r.l. (subsidiaries of KKR) and FiberCop S.p.A., which provided, among other things, for the contribution by TIM S.p.A. of the NetCo Branch to FiberCop S.p.A., a company already operating in the management of the secondary fiber and copper network, and the simultaneous purchase by Optics BidCo S.p.A. of TIM S.p.A.'s entire stake in FiberCop S.p.A.

The transaction agreement also governed the terms of a master services agreement between the new Entity “NetCo” (i.e. FiberCop S.p.A. following the transfer of the NetCo Branch) and TIM S.p.A., which was signed upon completion of the transaction.

The transaction was finalized on July 1, 2024.

In this section, to offer maximum transparency to the market and to users of its Sustainability Report, the TIM Group therefore discloses the main sustainability indicators of the NetCo component in the portion of the year in which it was part of the Organization, i.e. between January 1 and June 30, 2024. The indicators disclosed were selected based on two main drivers:

- sustainability aspects potentially material to NetCo’s business (fixed network);
- the choice of flow indicators at the expense of stock <sup>23</sup> indicators.

The analysis conducted identified the following ESRS disclosure requirements as material:

- **E1-5: Energy consumption and mix**
- **E1-6: Gross Scope 1, 2, 3 and Total GHG emissions**
- **E5-5: Resource outflows**
- **S1-6: Characteristics of the undertaking’s employees**
- **S1-9: Diversity metrics**
- **S1-14: Health and safety metrics**

Based on the information available to the TIM Group, the section below discloses all information required by the ESRS Standards with reference to the above-mentioned requirements.

<sup>23</sup> A stock indicator measures the quantity of a thing at a given time (e.g. number of company sites at a given time - December 31). A flow indicator, on the other hand, measures quantity over an interval of time (e.g. tCO<sub>2</sub> emissions over a certain time interval — January 1, 2024 to June 30, 2024).



## Sustainability performance

### E1 - Climate change

#### E1 - Metrics and targets

##### Disclosure requirement E1-5 - Energy consumption and energy mix

**[MDR-M, 77 a], [37 a, b]:** Below are metrics related to the energy consumption and energy mix of the NetCo business, which is not among the companies subject to the reporting requirements of high climate impact industries.

TIM uses standard methodologies to measure energy consumption and its mix. Total energy consumption, measured in megawatt hours (MWh), is divided into energy from fossil, renewable and nuclear sources. Energy from fossil sources includes fuels such as coal, oil and natural gas, as well as purchased energy from fossil sources.

Nuclear power, i.e., the share of electricity generated by nuclear power plants, was calculated based on the Residual Mix, using the figure published by AIB 2023 (Association of Issuing Bodies) to ensure consistency with the emission factors adopted in the emission calculations. For the reporting year, the share of nuclear power in the Italian Residual Mix of 4.40% was applied to total electricity consumption from mixed sources.

Self-produced and internally consumed energy is counted only once in the relevant category.

Finally, renewable energy is detailed in three categories: renewable fuels (biomass, biogas, renewable hydrogen), purchased renewable energy (electricity, heat, steam) and self-generated renewable energy.

##### **[37]: Energy consumption and mix - NetCo**

	UOM	2024
<b>Total energy consumption from fossil sources</b>	<b>MWh</b>	<b>670,017.62</b>
Percentage of fossil sources in total energy consumption	%	82.69
<b>Total energy consumption from nuclear sources</b>	<b>MWh</b>	<b>25,640.44</b>
Percentage of energy consumption from nuclear sources in total energy consumption	%	3.16
<b>Fuel consumption from renewable sources</b>	<b>MWh</b>	<b>0.00</b>
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	114,303.91
Consumption of self-generated renewable energy without relying on fuels	MWh	275.08
<b>Total energy consumption from renewable sources</b>	<b>MWh</b>	<b>114,578.98</b>
Percentage of renewable sources of total energy consumption	%	14.14
<b>Total energy consumption related to own operations</b>	<b>MWh</b>	<b>810,237.04</b>

**[39]:** The following are data from NetCo's business unit on power generation from nonrenewable sources and power generation from renewable sources.

##### **[39] Non-renewable and renewable energy production - NetCo**

	UOM	2024
Non-renewable energy production	MWh	58,313.45
Renewable energy production	MWh	275.08

##### Disclosure requirement E1-6 - Gross GHG emissions for Scope 1, 2, and 3, as well as total GHG emissions

**[MDR-M, 77 a], [44]:** Below are the gross Scope 1, 2 and 3 GHG emissions attributed to the NetCo business unit in metric tons of CO<sub>2</sub>eq. The emissions refer to the first half of 2024.

##### **[44] [52 a, b] Gross Scope 1,2,3 GHG emissions - NetCo**

	UOM	2024
Gross Scope 1 GHG emissions	tCO <sub>2</sub> eq	27,557.09
Gross Scope 2 Location-Based GHG emissions	tCO <sub>2</sub> eq	183,454.93
Gross Scope 2 Market-Based GHG emissions	tCO <sub>2</sub> eq	291,698.40
Gross Scope 3 GHG emissions	tCO <sub>2</sub> eq	358,053.98
<b>Total Location Based GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>569,066.00</b>
<b>Total GES Market Based emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>677,309.46</b>

**[MDR-M, 77 a], [48 a]: NetCo's gross Scope 1 GHG emissions** are reported in metric tons of CO<sub>2</sub>eq and are generated almost exclusively from **fossil fuels for heating, automotive, and power generation**.

Also included in the calculation and converted to CO<sub>2</sub> are leaks of hydrochlorofluorocarbon (HCFC) gases, hydrofluorocarbon (HFC) gases, and other gases when present in air-conditioning and fire-fighting systems.

Valuation of CO<sub>2</sub> equivalent emissions of HCFC, HFC and other refrigerant gases is done by considering global warming potentials (GWP): the index is based on a relative scale that compares the gas considered with an equal mass of carbon dioxide whose GWP is 1 and the calculation used the IPCC's Sixth Assessment Report (VI Report).

The emission factors used, expressed in CO<sub>2</sub>eq are published by DEFRA 2024 (Department For Environment, Food and Rural Affairs).

The calculation of the Scope 1 GHG emissions excludes absorptions, and any shares of GHG or carbon credits purchased, sold or transferred. Furthermore, NetCo is not included in the scope of activities for the EU Emissions Trading System (EU ETS).

Scope 1 GHG emissions are calculated by distinguishing the origin from stationary combustion, mobile combustion, process emissions and fugitive emissions using suitable data on activities that include consumption of nonrenewable fuels.

There are no biogenic emissions not included in Scope 1 attributable to the NetCo business unit.

#### **[48a] Type of GHG emissions included in Scope 1 - NetCo**

	UOM	2024
<b>Emissions by stationary combustion:</b>	<b>tCO<sub>2</sub>eq</b>	<b>13,869.09</b>
emissions from trigeneration	tCO <sub>2</sub> eq	11,643.27
heating emissions	tCO <sub>2</sub> eq	1,988.26
sources* <sup>24</sup>	tCO <sub>2</sub> eq	237.56
biogas emissions	tCO <sub>2</sub> eq	—
<b>Mobile combustion emissions:</b>	<b>tCO<sub>2</sub>eq</b>	<b>12,023.80</b>
emissions from haulage;	tCO <sub>2</sub> eq	12,023.80
emissions from machinery used for the maintenance and cleaning of plants;	tCO <sub>2</sub> eq	—
<b>Process emissions:</b>	<b>tCO<sub>2</sub>eq</b>	<b>—</b>
Emissions from tributaries;	tCO <sub>2</sub> eq	—
<b>fugitive emissions:</b>	<b>tCO<sub>2</sub>eq</b>	<b>1,664.20</b>
emissions from the dispersion of ozone-depleting gases	tCO <sub>2</sub> eq	1,664.20
<b>Total Scope 1 emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>27,557.09</b>

**[48 b]:** For Scope 1 GHG emissions, the NetCo business unit (in line with the Group) does not use and therefore does not consider emissions regulated by ETS.

**[MDR-M, 77 a], [49 a, b], [52 a, b], [RA 45 d]:** NetCo's **gross Scope 2 GHG emissions**, expressed in metric tonnes of CO<sub>2</sub>eq, are reported in a disaggregated manner, distinguishing between emissions measured by the Location Based method and those measured by the Market Based method.

For the **Location-Based methodology**, NetCo uses the average emissions associated with the electricity grid of the country where the energy is consumed, applying national emission factors. Databases used include ISPRA 2023 (published on 5/22/24). This approach reflects the indirect emissions deriving from purchased energy based on the composition of the local power grid.

For the **Market-Based methodology**, specific energy supply contracts such as green power purchase agreements were considered. NetCo uses the AIB 2023 emission factors (published 4/06/24) for the residual mix. No biogenic CO<sub>2</sub> emissions from the combustion or biodegradation of biomass are recorded for Scope 2 GHG emissions.

"Market Based" emissions are covered by Power Purchase Agreements with ERG for the supply of energy from wind power plants, covering 17% of the total energy purchased. The percentage coverage is for the first half of 2024 which reports energy consumption and the share of PPA available to NetCo as of June 30, 2024.

Below are the gross Scope 2 GHG emissions attributed to the NetCo business unit in metric tons of CO<sub>2</sub>eq.

<sup>24</sup> Emissions from self-generated electricity from mixed sources in the table include emissions from diesel fuel for generators

#### [49 a, b] Gross Scope 2 GHG emissions - NetCo

	UOM	2024
Gross Scope 2 Location-Based GHG emissions	tCO <sub>2</sub> eq	183,454.93
Gross Scope 2 Market-Based GHG emissions	tCO <sub>2</sub> eq	291,698.40

[MDR-M, 77 a], [51]: NetCo's **gross Scope 3 GHG emissions** are in line with the principles of the Corporate Value Chain (Scope 3) Accounting and Reporting Standard of the Greenhouse Gas Protocol (2011 version, pp. 61 and 65-68) and include reporting on the following emission-relevant categories: 1. "Purchased goods and services"; 2. "Capital goods"; 3. "Fuel and energy-related activities".

Offsets and any GHG allowances or carbon credits purchased, sold or transferred are excluded from the calculation of Scope 3 emissions.

The Scope 3 categories were measured using inputs from specific activities along the upstream and downstream value chain, but were not calculated based on raw data obtained from suppliers or other partners along the value chain.

Below are the calculation methodologies for the different Scope 3 categories:

- **Category 1 - Purchase of products and services.**: consistent with the Greenhouse Gas Protocol (GHGP), an expenditure-based methodology was adopted using the purchase items (expenditure approved), by commodity group. For the conversion of the monetary value into emissions, the NACE-Eurostat emission factors were used.
- **Category 2 - Purchase of capital goods**: an expenditure-based methodology was adopted that used investment items (expenditure approved, relative to the purchase value of the asset) by commodity group. Emission factors related to the type of purchase published by Eurostat were used to convert the monetary value to emissions.
- **Category 3 - Fuels and energy-related activities (not included in Scope 1 or 2)**: the calculation was made by multiplying the fuel consumption and electricity purchase data of Scope 1 and Scope 2 by their respective emission factors. These factors include the impact generated by the production of the energy carrier and the losses associated with transportation and distribution. For fuels, the DEFRA 2024 database was used; For nonrenewable electricity, however, DEFRA 2021 emission factors were used, as those for the 2024 database were no longer available.

The calculation of the Scope 3 GHG emissions excludes absorptions, and any shares of GHG or carbon credits purchased, sold or transferred.

#### [51]: Gross Scope 3 GHG emissions - NetCo

	UOM	2024
Category 1 Purchased goods and services	tCO <sub>2</sub> eq	262,348.15
Category 2 Capital goods	tCO <sub>2</sub> eq	38,588.40
Category 3 Fuel- and energy-related activities not included in Scope 1 or Scope 2	tCO <sub>2</sub> eq	57,117.43
<b>Gross Scope 3 GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>358,053.98</b>

[MDR-M, 77 a], [47]: Due to the organizational discontinuity that occurred on July 1, 2024 and resulted in significant changes in the circumstances affecting GHG emissions, it is not possible to provide comparative information with respect to previous years

In addition, there were no biogenic emissions of CO<sub>2</sub> from the combustion or biodegradation of biomass that occur in its upstream and downstream value chain.

[MDR-M, 77 a], [53]: Below is expressed the value of GHG Intensity in metric tons of CO<sub>2</sub>eq by relating NetCo's net revenues to total GHG emissions by both the market-based and location-based method.

#### [53] GHG intensity relative to net revenues - NetCo

	UOM	2024
Total Location Based GHG emissions	tCO <sub>2</sub> eq	569,066.00
Total Market Based GHG emissions	tCO <sub>2</sub> eq	677,309.46
Net revenues used to calculate GHG intensity	€ million	2,317.00
<b>Intensity of Location Based GHG emissions</b>	<b>tCO<sub>2</sub>eq/million €</b>	<b>245.60</b>
<b>Intensity of Market Based GHG Emissions</b>	<b>tCO<sub>2</sub>eq/million €</b>	<b>292.32</b>

## [55] Reconciliation with financial statements

	UOM	2024
Net revenues used to calculate GHG intensity (E1-6)	€ million	2,317.00
Net revenues (other)	€ million	—
<b>Total net revenues (in financial statements)</b>	<b>€ million</b>	<b>2,317.00</b>

## E5-Resource use and circular economy

### E5\_Metrics and targets

#### Disclosure Requirement E5-5 - Resource outflows

[MDR-M, 77 a], [37 a, b, c, d]: Waste is classified according to the European Waste Catalogue (EWC) and is obtained through direct measurements and tracked on dedicated management systems. Waste classification, management and delivery methods are in accordance with Directive 2008/98/EC of the European Parliament and Council, also known as the "Waste Framework Directive."

#### [37] Waste generated - NetCo

	UOM	2024		
		Hazardous waste	Non-hazardous waste	Total
<b>Total waste generated</b>	<b>t</b>	<b>36.71</b>	<b>868.16</b>	<b>904.87</b>
<b>Waste not directed to disposal</b>	<b>t</b>	<b>36.71</b>	<b>868.16</b>	<b>904.87</b>
Waste diverted from disposal for preparation for reuse	t	0.00	0.00	0.00
Waste diverted from disposal through recycling	t	0.00	0.00	0.00
Waste diverted from disposal for other recovery operations	t	0.00	0.00	0.00
<b>Total waste directed to disposal</b>	<b>t</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
Waste directed to disposal for incineration	t	0.00	0.00	0.00
Waste directed for disposal for landfill	t	0.00	0.00	0.00
Waste directed for disposal for other disposal operations	t	0.00	0.00	0.00
of which non-recycled waste	t	0.00	0.00	0.00
<b>Percentage of waste not recycled</b>	<b>%</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

[38 a, b]: Relative to its own operations, NetCo produces:

- Non-hazardous waste such as mixed packaging, inks and toners, discarded equipment, and electrical and electronic waste;
- hazardous waste such as batteries and accumulators.

These types of waste are in line with the TLC sector.

In general, the materials in the main types of waste generated by NetCo include mainly biomass (paper, wood, and cardboard); plastic; glass; mixed metals (iron, steel and copper).

[39]: The total amount of hazardous and radioactive waste in tons attributed to NetCo is shown below.

#### [39] Hazardous and radioactive waste - NetCo

	UOM	2024
Total amount of hazardous waste	t	36.71
Including total amount of radioactive waste	t	0.00

[MDR-M, 77 a], [40]: The ways in which waste is classified, managed and delivered are identified in accordance with Directive 2008/98/EC of the European Parliament and Council, also known as the "Waste Framework Directive".

Data pertaining to waste type follow the European Waste Catalogue (EWC) classification and are obtained through direct measurements and tracked on dedicated management systems.

## S1-Own workforce

### S1 - Metrics and targets

#### Disclosure Requirement S1-6 - Characteristics of the undertaking's employees

##### [50 a] Employees by gender - NetCo.

	UOM	2024				
		Women	Men	Other	Not reported	Total
Total employees - at the end of the period (head	n	4,479	15,392	—	—	19,871
Employee breakdown by gender - at the end of the	%	22.54	77.46	—	—	—
Total employees - period average (head count)	n	—	—	—	—	—
Employee breakdown by gender - period average	%	—	—	—	—	—

##### [50 b] Employees by contract type and gender at end of period - NetCo

		2024				
	UOM	Women	Men	Other	Not reported	Total
Total employees	n	4,479	15,392	—	—	19,871
Permanent employees	n	4,479	15,391	—	—	19,870
Fixed-term employees	n	0	1	—	—	1
Non-guaranteed hours employees	n	0	0	—	—	0

##### [50 c] Employee turnover - NetCo

	UOM	Women	Men	2024 Other	Not reported	Total
Total employees	n	4,479	15,392	—	—	19,871
Employees who have left the company	n	20	51	—	—	71
Employee turnover rate	%	0.45	0.33	—	—	0.36

[MDR-M, 77 a]: The turnover rate is calculated as the ratio of the number of employees terminated during the reporting year to the total number of employees at the end of the reporting period. Employees who have terminated employment due to retirement, incentive termination, spontaneous resignation, layoff, and death in service are considered. It is specified that all data are calculated as of 06/30/2024.

[MDR-M, 77 a], [50 d]: The data collection of employee numbers for the first half of 2024 for the NetCo business unit was carried out by extrapolating data from the Group's IT systems. The data are expressed in headcount and at the end of the period.

[MDR-M, 77 a], [50 e]: To understand the data it is necessary to refer to the introduction in the same section. In addition, with reference to the total number of employees, the NetCo perimeter reported is photographed as of June 30, 2024, and includes 7 headcounts terminated on the same day and thus not included in the headcount to be transferred to NetCo.

[50 f]: The reference to the number of NetCo employees cannot be consulted in the 2024 Consolidated Financial Statements as this figure is no longer reported following the sale of NetCo.

#### Disclosure requirement S1-9 - Diversity metrics

##### [66 a] Employees at Top management level by gender - NetCo

	UOM	Women	Men	2024 Other	Not reported	Total
Total employees at Top management level	n	1	2	—	—	3
Gender distribution amongst employees at top management level	%	33.30	66.70	—	—	100.00

[MDR-M, 77 a]: NetCo defines “**Top Management**” as people who play a key role in the development of business strategies and who report directly to the Management and Control bodies or to the Chief Executive Officer. It is specified that NetCo data are calculated as of 06/30/2024.

#### [66 b] Employee distribution by age group - NetCo

	UOM	2024				
		Women	Men	Other	Not reported	Total
<b>Total employees</b>	<b>n</b>	<b>4,479</b>	<b>15,392</b>	<b>—</b>	<b>—</b>	<b>19,871</b>
Employees under 30 years old	n	32	295	—	—	327
	%	0.71	1.92	—	—	1.65
Employees between the ages of 30 and 50	n	1,326	3,187	—	—	4,513
	%	29.60	20.71	—	—	22.71
Employees over the age of 50	n	3,121	11,910	—	—	15,031
	%	69.68	77.38	—	—	75.64

[MDR-M, 77 a]: In this table, the percentage of employees by age group is calculated by relating the number of employees by age group and gender to the total by gender. It is specified that for NetCo, data are calculated as of 06/30/2024.

#### [66 b] Percent distribution of employees by age group - NetCo

	UOM	2024				
		Women	Men	Other	Not reported	Total
Percentage of employees under 30	%	0.16	1.48	—	—	1.65
Percentage of employees between 30 and 50 years	%	6.67	16.04	—	—	22.71
Percentage of employees over 50 years old	%	15.71	59.94	—	—	75.64

[MDR-M, 77 a]: This table shows the percentage of employees by age group and gender, out of the total number of employees. It is specified that for NetCo, data are calculated as of 06/30/2024.

## Disclosure Requirement S1-14 - Health and Safety Metrics

#### [88 a]: Workers covered by the health and safety management system - NetCo

	UOM	2024		
		Employees	Non-employees	Total
Own workers covered by the health and safety management system	n	19,871	—	19,871
	%	100.00	—	100.00

#### [88 b]: Fatalities from work-related injuries and illnesses - NetCo

	UOM	2024			
		Employees	Non-employees	Other workers	Total
Fatalities from work-related injuries and illnesses	n	0	0	0	0

From January 1, 2024 to June 30, 2024, there have been no deaths due to work-related injuries.

#### [88 c] Recordable Occupational Injuries - NetCo

	UOM	2024		
		Employees	Non-employees	Total
Recordable work-related accidents	n	108	—	108
Rate of recordable work-related accidents	%	6.99	—	6.99



**[MDR-M, 77 a]:** The number of recordable occupational injuries corresponds to the recorded injuries that resulted in at least one day off work. The figure does not include injuries caused by passive accidents.

The work injury rate is calculated as the ratio of the number of recorded work injuries to the total hours worked in the year (given by the sum of hours worked, overtime hours, training hours and travel hours), which is 39,850,276, multiplied by 1,000,000. It is specified that the data are calculated as of 06/30/2024.

**[88 d, e] Cases and days lost due to occupational injuries, accidents and deaths - NetCo**

	UOM	2024
Recordable cases of work-related illness	n	3
Work days lost due to work-related injuries and fatalities due to work-related injuries and illnesses and fatalities due to illnesses	n	3,703

**[MDR-M, 77 a]:** The number of cases involving recordable work-related illnesses refers to complaints filed during the reporting period. Days lost due to injury do not consider days not worked for commuting accidents, unless transportation was arranged by the Company, or for injuries caused by passive accidents. In the case of an injury with absences spanning two reporting years, the injury is recorded in the year in which it occurs, while the days of absence are counted in the year in which they are actually used. It is specified that all data are calculated as of 06/30/2024.

# Certification of the sustainability report pursuant to Article 81-ter of CONSOB Regulation no. 11971, of May 14, 1999, as amended

The undersigned Pietro Labriola, in his capacity as Chief Executive Officer of TIM S.p.A., and Enrica Danese, in her capacity as Sustainability Reporting Manager of TIM S.p.A., certify, pursuant to Article 154-bis, paragraph 5-ter, of Legislative Decree No. 58 of February 24, 1998, that the sustainability reporting included in the Report on Operations has been prepared:

- in accordance with the reporting standards applied pursuant to Directive 2013/34/EU of the European Parliament and of the Council of June 26, 2013, and Legislative Decree No. 125 of September 6, 2024;
- with the specifications adopted under Article 8(4) of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020.

March 5, 2025

**Chief Executive Officer**

/ signed /

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Pietro Labriola

**Manager in charge of  
Preparing the Sustainability  
Report**

/ signed /

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Maria Enrica Danese