

# Sustainability Report 2022

Consolidated non-financial  
statement 2022 pursuant to  
Legislative Decree 254/2016

# Letter to Stakeholders

*The strength of connections represents our vision:  
having the courage to create value by leading change*

The digital sector is the engine of economic and social growth, but it risks being just a slogan if we do not create the conditions for its development.

The evolution of the competitive scenario has made the rules system obsolete and the uncertainty of the macroeconomic scenario has accentuated the difficulties of our sector. This drives me to be determined in seeking solutions to the key problems of the Group and promoting change. Inaction is not an option!

It is necessary to enable the industry consolidation, incentivize the leap towards new technologies, and introduce new mechanisms for a more equitable redistribution of costs related to the growth of data traffic, such as the “fair share” approach. The renewal of the regulatory framework for telecommunications is a fundamental piece of the puzzle to be put together to achieve a more balanced digital ecosystem.

With the Industrial Plan presented in July 2022, we have outlined the path towards the transformation of our Company and the entire sector.

We have chosen to move beyond the vertically integrated model, as it no longer meets the needs of a market as the Italian one. Infrastructure and services are two worlds that can perform better if managed separately, to focus on their respective strengths and potential growth, and to ensure better capital allocation. And I don't believe this necessarily applies to Italy only.

Companies and Public Administration look for digital solutions that help them to transform and offer their customers accessible and to reliable services with a lower environmental impact. Solutions must be simple and secure, which is why we have brought all cloud, IoT, and security activities and services under a single business unit: TIM Enterprise, which uses the largest network of designers, sellers, and customer care in the ICT market.

In 2022, its revenues grew more than those of the market and we expect further growth, thanks to greater efficiency resulting from organizational integration and the increasing customization of our products and services.

With more than 90 million mobile lines and about 16 million fixed lines, our products and services can help promote sustainable lifestyles. Our TIM Green line is useful in concretely stimulating a change in the behavior of our customers because it includes products and accessories with low environmental impact and services to extend the useful life of devices, through regeneration, recycling, and recovery of materials.

Infrastructure requires significant investments to ensure technological evolution, but when the cost of capital increases and the return on investment is uncertain, we must overcome the constraints determined by vertical integration of the business and seek economies of scale through market consolidation. The value of this model is supported by the interest of

investors, both national and international, who want to focus on infrastructure business.

However, we have implemented specific actions on all Group infrastructure including data centers, to contain energy, water and cooling consumption, and to reduce CO<sub>2</sub> emissions by making increasing use of renewable energy, in terms of efficiency and environmental impact.

The evolution of the technological and economic scenario also requires to operate on our organization. With approximately 50,000 colleagues and an average age of 49 years, we need a deep transformation. First of all, we have decided to protect jobs by continually improving and redeveloping skills. And this is not just a slogan, think about other companies in better financial condition, that plan to substantially reduce their workforce. We have adopted flexible working models and we have made our workplaces increasingly sustainable. Each year, we significantly invest in welfare to support the well-being of our employees and their families through initiatives that promote, for example, work-life balance, family care, education, health, and financial support.

Inclusion and talent enhancement are important ethical values, but also a point of contact with the new generations. We are taking actions to eliminate the gender gap and ensure equal opportunities

and professional growth. Gender equality is indeed a resource on which to build a more solid world of work and a more equal society. In 2022, we reached 43% of women on the Group's board of directors and over 28% of women's presence in managerial roles, in addition to carrying out development and empowerment projects. To this is added the 4Weeks4Inclusion initiative, the marathon that we carry out together with our partners to promote the values of inclusion also outside the company.

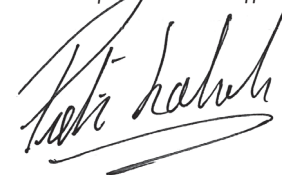
The projects and actions we have put in place run through our entire business because they intercept what is relevant for the sector and the Group in the medium/long-term and what can determine significant changes both in terms of opportunities and risks. For example, the increasing purchase of renewable energy has partially protected our income statement from sudden increases in fossil fuel prices. Through network and data center efficiency, we have contained the consumption resulting from data growth. With the circular economy we have transformed waste reduction and recovery into an economic resource. Our green data centers allowed us to win the tender for the establishment of the National Strategic Hub will provide cloud services based on our infrastructure to the entire Public Administration.

These facts show that we are moving in the right

direction, carrying out actions that benefit both our Group and the community. We are experiencing that sustainability does not represent a trade-off between the costs to support it and the environmental and social impact. And we are convinced that our change will concretely contribute to the objectives of the 2030 Agenda and the guidelines of the United Nations Global Compact to which we have long adhered.

A year ago, few people believed that we would achieve the ambitious goals we set for ourselves. The first results are now evident to everyone, even though the road is still long. We will continue to walk it with determination and courage, committing ourselves everyday because sustainability for us is a lifestyle. We are part of an ecosystem that goes beyond competition, regulation and profits. Everyone must do their part.

**Pietro Labriola**  
Chief Executive Officer



# Index

TIM Group at a glance .....	5
Sustainability for TIM .....	7

## ENVIRONMENT ..... 13

Environmental strategy .....	14
Greenhouse gas emissions .....	16
Energy efficiency .....	18
Electricity .....	23
Circular economy and resource efficiency .....	25
TIM Green .....	29
Sustainable Supply Chain .....	32
Employee mobility .....	36
Biodiversity .....	38

## SOCIAL ..... 39

DIGITAL GROWTH .....	40
Development of ICT infrastructure .....	41
Digital solutions for business growth and sustainability .....	42
Digital identity services .....	44
Public sector transformation projects .....	45
Tools to support digital innovation .....	48
TIM PEOPLE .....	49
Value of our people .....	50
Our training and reskilling programs .....	51
People Caring .....	53
Smart working .....	54
Inclusion .....	55
Gender GAP .....	59
Health and Safety protection .....	60

## ACTIVITIES IN THE SOCIAL FIELD ..... 61

Collaboration with Institutions .....	62
Solidarity fundraising .....	63
Foundations .....	64

## GOVERNANCE ..... 66

Corporate Governance Structure.....	67
Internal control system .....	69
ESG Governance tools .....	71
Business Integrity .....	79

## FURTHER INFORMATION ON GLOBAL REPORTING INITIATIVE (GRI) AND EU TAXONOMY (Regulation 2020/852) ..... 84

Methodological note .....	85
GRI 2 - General Disclosures .....	87
GRI 3 - Material Topics .....	126
Correlation Material Topics - Enterprise Risk Management .....	205
Environment .....	212
Human Rights - Discrimination .....	228
Employees .....	231
Suppliers .....	257
Customers.....	263
Civil Society .....	271
Sector business community .....	289
Legislative Decree 254/2016 Connection .....	290
GRI Content Index .....	291
European Taxonomy .....	300
Independent Auditors' Report .....	320



# TIM Group at a glance

*We are the first telecommunications Italian operator and with innovative technologies and services we drive digital transition in Italy<sup>(1)</sup> and Brazil*

(1) In this document, the "Italy" perimeter refers to TIM S.p.A. and companies controlled and fully consolidated by it as of December 31, 2022. This perimeter corresponds to "Domestic BU" indicated in the non-financial report.

We offer individuals and families fixed and mobile telephony services and products for communication and entertainment, we support small and medium-sized enterprises towards digitalization with a portfolio tailored to their needs.

**Cloud, IoT and Cybersecurity** are at the center of **TIM Enterprise's** end-to-end solutions for businesses and Public Administration, which realize the country's digital transformation using the largest network of data centers in Italy, the expertise of Group companies such as **Noovle, Olivetti and Telsy**, and partnerships with leading groups.

We develop **fiber fixed network infrastructures** which we make available to the entire market, both through a widespread presence throughout the national territory and through Sparkle at the international level. In Brazil, TIM Brasil is one of the main players in the South American communications market and a leader in 4G coverage.

Through **Fondazione TIM**, we also support projects of high social interest.



## KEY 2022 NUMBERS

€ **4.0** Bln€  
capital expenditures

€ **15.8** Bln€  
revenues

 **6.0** Bln€  
organic EBITDA

## ITALY

**30.4** Mln  
mobile lines

**99%**  
population covered by 4G

**388** municipalities  
covered by 5G

**15.8** Mln  
fixed lines

**10.6** Mln  
ultra-broadband lines

**40,737**  
people

## BRAZIL

**62.5** Mln  
mobile lines

**Leader in 5G**  
the only operator in all municipalities

**9,395**  
people

## SHAREHOLDING STRUCTURE



## BENEFIT CORPORATION

since 2021 **Noovle**

since 2022 **Olivetti**

purchased in 2022 **Mindicity**

## MAIN BRANDS

 **TIM**

 **TIM ENTERPRISE**

 **noovle** | A TIM ENTERPRISE BRAND

 **olivetti** | A TIM ENTERPRISE BRAND

 **Telsy** | A TIM ENTERPRISE BRAND

 **SPARKLE**

 **FiberCop**

FONDAZIONE  
 **TIM**

# Sustainability for TIM

## ESG targets of the Industrial Plan

In defining the ESG targets of our Plan, we have considered four main areas of intervention that also guide our projects: environmental protection, digital growth of Italy, enhancement of employees skills, and governance strengthening.

As for **environmental protection** we aim for efficient infrastructure with increasing use of renewable energy, circular models for recycling and recovery of waste, ESG suppliers and a green commercial offer.

For the **digital growth of Italy** we bring ultra-fast connectivity throughout the territory and offer innovative digital services for individuals, businesses and Public Administrations.

As for the enhancement of **TIM people** we develop their skills, foster talent growth and reduce the gender gap.

To **strengthen Governance** we consolidate organizational levers and tools to minimize risks and company costs, integrating ESG into processes and business systems.

In the 2022-2024 Plan, we have set **12 specific and measurable targets, 5** for the **Group** and **7** for the **Italy** perimeter, which give substance to our commitments.

In the 2023-2025 Plan, we made some changes to consider the 2022 performance, and we aligned the main targets to 2025 to ensure a more homogeneous reading, net of long-term goals.



## ESG TARGETS OF THE INDUSTRIAL PLAN AND 2022 CLOSING

		Target 22-24		Closing 2022	Target 23-25	
GROUP	<b>E</b> Net Zero (Scope 1+2+3) <sup>(1)</sup>	2040		-13%	2040	
	<b>E</b> Carbon Neutrality (Scope 1+2) <sup>(1)</sup>	2030		-43%	2030	
	<b>E</b> Scope 3 Reduction <sup>(1)</sup>	-47%	2030	-8%	-47%	2030
	<b>E</b> Renewable energy on total energy	100%	2025	61%	100%	2025
	<b>S</b> Women in leadership position <sup>(2)</sup>	29%	2024	28%	≥29%	
ITALY	<b>E</b> Green Products & Smartphones	≥50%	2024	60%	≥70%	
	<b>E</b> Circular Economy Ratio <sup>(3)</sup>	+11% from 0.04€/kg		0.3€/kg	2€/kg	
	<b>S</b> Cloud, IoT & Security service revenues <sup>(4)</sup>	+20% CAGR 22-24		+21% vs 21	+21% CAGR 23-25	
	<b>S</b> Digital Identity Services <sup>(5)</sup>	+15% CAGR 22-24		+31% vs 21	+30% CAGR 23-25	
	<b>S</b> People trained on ESG skills	90%		69% <sup>(6)</sup>	≥90%	
	<b>S</b> Young Employees Engagement	≥78%		77%	≥78%	
	<b>S</b> FTTH Coverage (% of technical units)	~60%	2026	32%	48%	

(1) Baseline 2019 (2) Weighted average of target 23-25 Italy ≥27% made up of "Italian women managers" and target Brazil ≥35% made up of "Brazilian women managers" (3) Average revenue from resale of waste, materials, and goods no longer used per kg of waste produced (4) Target 22-24 excludes revenue from cloud services (5) PEC, SPID, Digital Signature (active services) (6) Population involved in the "Sustainability Scenarios" pathway

Scope 1: emissions from production activities (trigeneration, transport, ozone depleting gases, heating and generator sets)

Scope 2: emissions from purchased electricity

Scope 3: upstream and downstream emissions occurring in the value chain (cat.1-purchase of goods; cat.2; capital goods; cat 11-use of sold goods)

— New



## Main 2022 ESG results

In Italy, in 2022, we implemented more than **40 projects** that allowed us to record progress against Plan targets and achieve important results in the environmental, social, and governance fields. Below are some of the main results.

### ENVIRONMENT

- Successfully managed growth in Data Center traffic through **infrastructure efficiency interventions**
- **Shutdown of the 3G** mobile network resulting in savings of approximately 20 GWh
- **More than 900 TIM suppliers on the Open-es platform** to create an ecosystem of sustainable partners
- Alliance with the **European Green Digital Coalition** to promote the role of digitalization in reducing CO<sub>2</sub> emissions
- Accession to the international initiative **Eco Rating** to measure the environmental impact of smartphones

### SOCIAL

- **94.5 % of TIM's fixed customer's in Italy reached by FTTH/FTTC; 76.4% in white areas**
- More than 99% of the national population covered by 4G network and **388 municipalities reached with 5G**
- Launched the **first 10Gbps quality offer** available on the Italian market
- "Connected Schools" and "Connected Health" projects financed by the PNRR for a total of 6 lots and approximately 177 million euros.
- **Establishment of the National Strategic Hub**, with Leonardo, Cassa Depositi e Prestiti, and Sogei to promote the digitization of Italian Public Administrations
- **Olivetti** becomes the **second Benefit Corporation** of TIM Group after Noovle and Mindicity (already Benefit upon acquisition)













### GOVERNANCE

- Starting digitization of the **ESG reporting process**
- **Adjustment of the materiality process and non-financial reporting** to the new GRI (Global Reporting Initiative) standards
- Implementation of **European Taxonomy** according to the modalities provided by European working table

## Alliances and partnerships to adopt the best ESG standards

We have long collaborated with various national and international organizations to promote sustainable development and disseminate universally recognized values. In 2022, we intensified alliances and collaborations in the ESG field to share and adopt the best environmental and social standards.

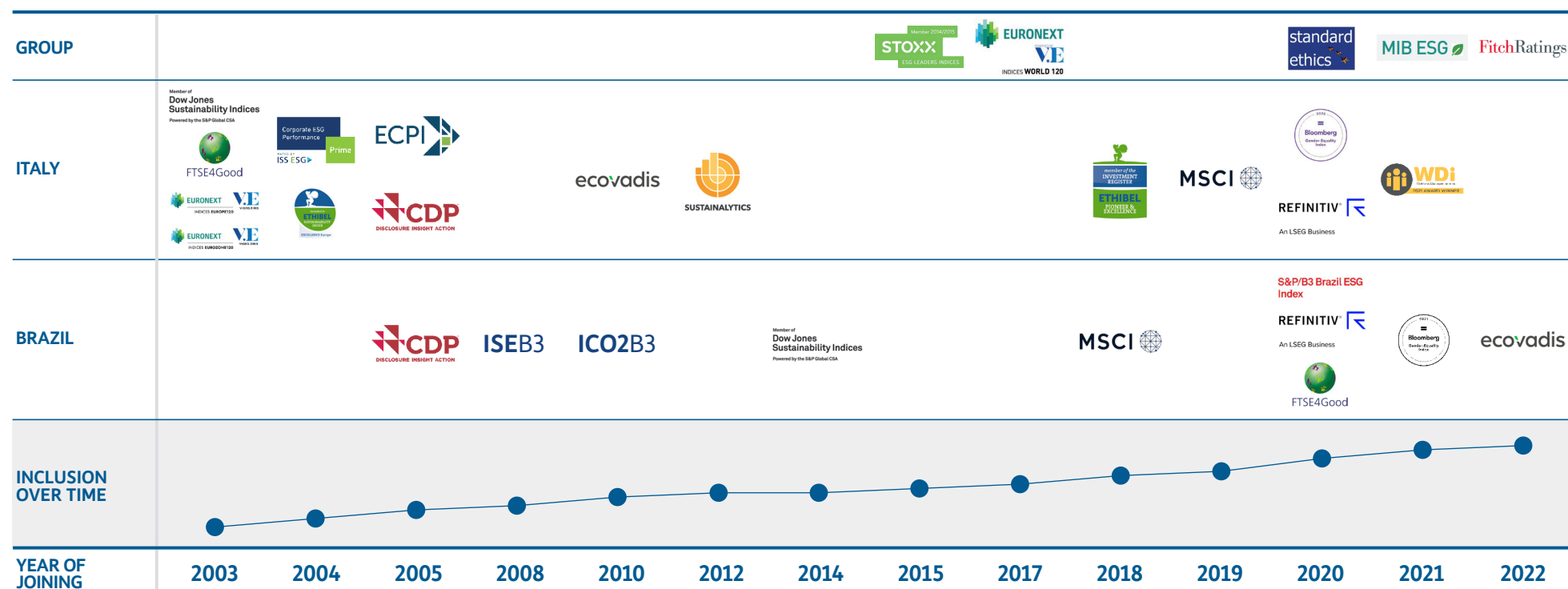
### TIM'S MAIN COLLABORATIONS

From December 2022		Eco Rating	We support the initiative of international mobile operators that <b>assess the environmental impact of smartphones</b> to help customers make informed and more sustainable choices and to encourage suppliers to reduce the environmental impact of their devices
From September 2022		European Green Digital Coalition	We are part of the alliance formed by leading European companies in the ICT sector to <b>promote the role of digitalization in reducing CO<sub>2</sub> emissions</b> through innovative technologies with a low environmental impact
From September 2022		Open-es	In Italy, we are partners of the system alliance that <b>aims to measure the sustainability performance of suppliers, strengthen the qualification process</b> with market ESG standards, and build shared growth paths
June 2022		SBTi (Science Based Targets initiative)	We obtain <b>scientific validation of our environmental strategy</b> from the international organization that promotes the definition of measurable goals for reducing the carbon footprint and independently validates them
Since 2020		ASVIS (Alliance for Sustainable Development)	We are a sponsor of the Italian alliance created to <b>increase awareness</b> among Italian economic entities and institutions of the <b>importance of the commitments of the 2030 Agenda</b> for sustainable development
Since 2010		JAC (Joint Audit Cooperation)	We are founders, together with Orange and Deutsche Telekom, of the international association of telecommunications operators that <b>verifies, evaluates, and develops sustainability in the supply chain of the information and communication technology industry</b>
Since 2008		GeSI (Global Enabling Sustainability Initiative)	We are a partner of the <b>International Association for Digital Transformation</b> that provides a unified voice for its ICT members towards Stakeholders, policymakers, and institutional communities in the sector
Since 2002		Global Compact	We are members of the Global Compact Network Italy, which <b>promotes a sustainable global economy</b> that respects human and labor rights, environmental protection and fights against corruption
Since 1995		GSMA (Global System for Mobile Communications Association)	We are members of the international association that brings together the main mobile telecommunications operators and <b>develops studies on the positive contribution of technology in reducing greenhouse gas emissions</b> and achieving sustainable development goals
Since 1992		ETNO (European Telecommunications Network Operators' Association)	We are part of the European Association of Telecommunications Network Operators <b>whose mission is to develop a regulatory environment conducive to the provision of services for citizens and businesses</b>
Since 1988		ETSI (European Telecommunications Standards Institute)	We are a member of the leading European <b>telecommunications standardization</b> organization
Since 1970		ITU (International Telecommunication Union)	We are a member of the United Nations Agency that aims to <b>coordinate global telecommunications activity</b>

## ESG indices and ratings to confirm our sustainability performance

As TIM Group we have been present, since 2003, in the sustainability indices of the main international rating agencies and, to date, we are **included in over 20 ESG indices and ratings**, getting notable scores which denote high performance and low levels of risk. Continuous dialogue with rating agencies supports us in analyzing the results achieved and in planning new actions to be implemented in the ESG field.

### THE MOST RELEVANT ESG INDICES AND RATINGS WHERE TIM GROUP IS INCLUDED



The performance recorded in 2022 led to significant recognition by ESG rating agencies.

## MAIN RECOGNITIONS



The Group has been included in the indices for Italy since 2003 and for Brazil since 2014. In 2022, we confirmed our position as the **only Italian telecommunications Company** in the **Dow Jones Sustainability Europe Index**, and we were also distinguished in the **Top 10% of the S&P Global ESG Score** in the S&P Global Sustainability Yearbook 2023.



The Group has been included in Moody's ESG Solutions Global Index (formerly Vigeo Eiris) since 2017. In 2022, we **ranked first among telecommunications companies** with an ESG performance above the sector average, and in the "advanced" category of the overall ranking.



The Group has been in the index since 2020 for Italy and 2021 for Brazil. In 2022, we had a scoring higher than the industry average and all companies included in the index, positioning us among the **world leaders for gender diversity and equality** in Bloomberg Gender Equality Index 2023.



The Group has been in the index since 2020 for both Italy and Brazil. In 2022, we also **confirmed our position among the top 100 companies and the first Company in Italy and South America in the telecommunications sector.**



The Group has been participating in the CDP (formerly the Carbon Disclosure Project) questionnaire since 2010. In 2022 we are **on the B list for Climate Change** for both Italy and Brazil, confirming our environmental commitment in terms of actions, objectives, and governance.



The Group has been included in the rating since 2010 for Italy and since 2022 for Brazil. In Italy, in 2022, TIM is **in the top list of companies** achieving the "platinum" level for ESG performance in terms of labor, human rights, environment, ethics, and supply chain, while TIM Brazil achieves the "gold" level.



In Italy, in 2022, TIM was awarded as the **best Company** for LGBT+ inclusion by the **Parks LGBT+ Diversity Index**, which identifies the most inclusive Italian companies in this area.



# ENVIRONMENT

Environmental strategy .....	14
Greenhouse gas emissions .....	16
Energy efficiency .....	18
Electricity .....	23
Circular economy and resource efficiency .....	25
TIM Green .....	29
Sustainable Supply Chain .....	32
Employee mobility .....	36
Biodiversity .....	38

# Environmental strategy

*We work to achieve  
“zero-emissions” and maximum  
efficiency in the use of resources*

The ICT sector relies on fixed and mobile network infrastructures and data centers that require **significant amounts of energy** and, therefore, generate considerable CO<sub>2</sub> emissions. An environmental issue that, with the increase in energy costs resulting from the recent crisis, also translates into a business issue.

To curb the effects of climate change, as early as 2020 we have started a program to progressively decarbonize the activities of the supply chain, to make the energy consumption of assets more efficient,

to increase the use of renewable energy sources, including self-production, and to promote circular models to reduce waste and valorize resources.

From **2022**, to accelerate the reduction of greenhouse gas emissions, we have included two new targets in the ESG Plan: a **47% reduction** in upstream and downstream emissions occurring in the value chain (**Scope 3**) by 2030, and **Net Zero emissions (Scope 1+2+3)** by 2040. Also, in 2022, our **climate strategy** was **validated by the Science Based Targets initiative (SBTi)**, which has confirmed the

coherence of this strategy with the goal of keeping global warming within 1.5°C as established by the Paris Agreement on climate change.

The strategy is complemented by the inclusion of:

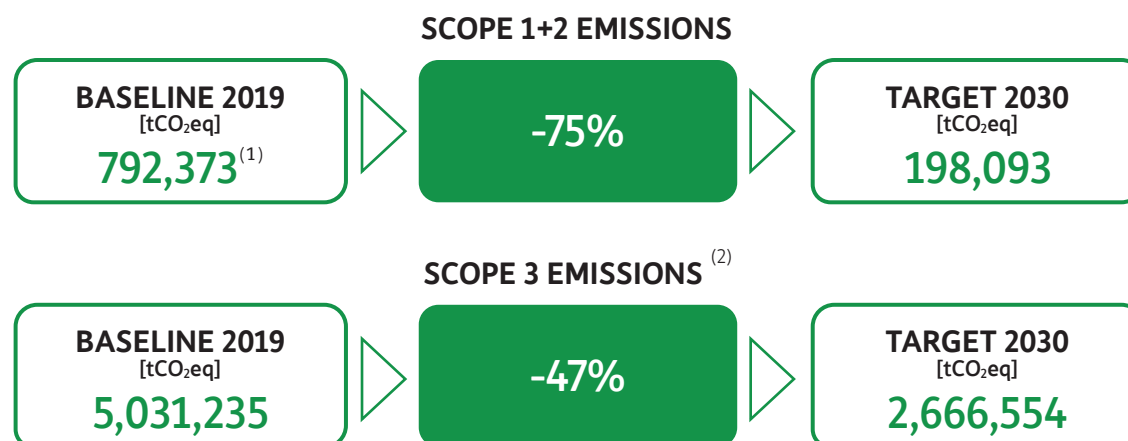
- **a circular economy target** to reduce and valorize waste (**Circular Economy Ratio 2€/kg by 2025**);
- **a target for green products and smartphones** to encourage customers towards more sustainable choices (**≥70% green products and smartphones by 2025**).

## OUR GROUP TARGETS AND COMMITMENT WITH THE SCIENCE BASED TARGETS INITIATIVE

### Environmental targets in the 2023-2025 Plan

- 1 **100% RENEWABLE ENERGY**  
BY 2025
- 2 **CARBON NEUTRALITY (SCOPE 1+2)**  
BY 2030
- 3 **-47% SCOPE 3**  
BY 2030
- 4 **NET ZERO (SCOPE 1+2+3)**  
BY 2040

### Environmental targets validated by the Science Based Targets initiative (SBTi)



(1) The 2019 emissions were re-determined to submit the objectives to the SBTi. The re-determination differs by less than 1% from the 2019 baseline.

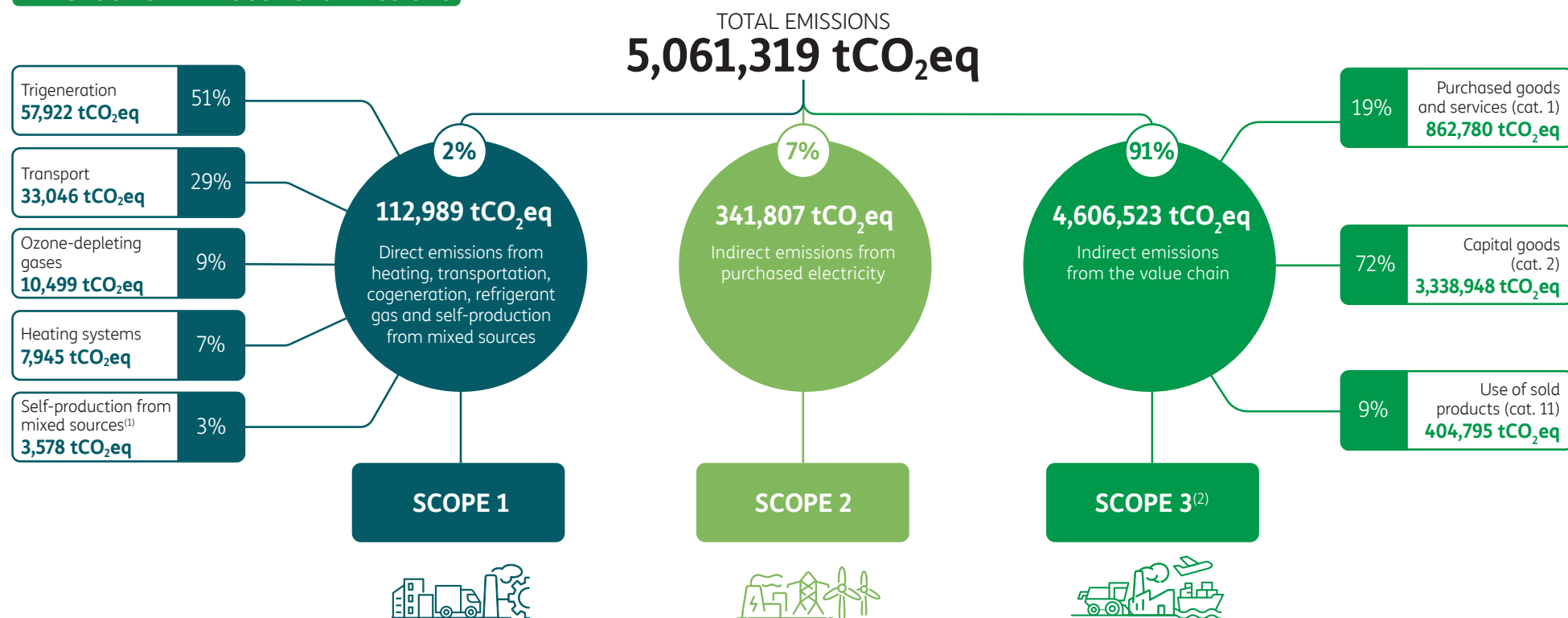
(2) The target includes categories 1 (purchased goods and services), 2 (capital goods), and 11 (use of sold products).

# Greenhouse gas emissions

*We analyze our activities to structure the path to emission reduction*

To measure our Company's CO<sub>2</sub> emissions, we apply the **"GHG Protocol"**, which distinguishes between direct emissions (Scope 1), indirect emissions (Scope 2) and other indirect emissions (Scope 3).

## TIM GROUP GREENHOUSE GAS EMISSIONS

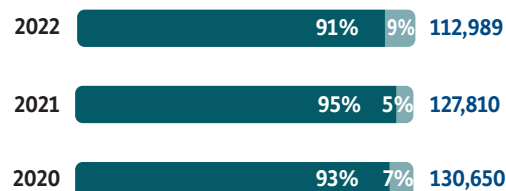


The figures shown have been rounded up; as a result, the amounts may not correspond to the totals reported.

(1) They include both diesel emissions for generating sets and natural gas emissions for energy self-production.

(2) Scope 3 includes measurement and certification of 3 out of 15 emission categories.

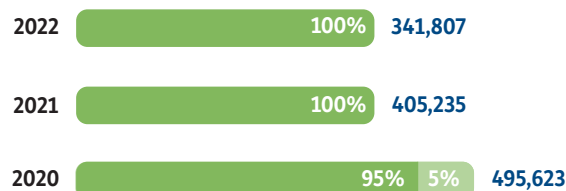


**SCOPE 1 EMISSIONS - GROUP**(tCO<sub>2</sub>eq)

■ Italy ■ Brazil ■ Group

Our **Scope 1 emissions** are generated by productive activities and regard **fossil fuel consumption** to power heating and trigeneration plants in the exchanges and Data Centers, generators sets and the company fleet. For Brazil, emissions also concern those arising from natural gas consumption for electricity self-production.

In 2022, we reduced these emissions by **12% compared to 2021** and by **27% compared to 2019** thanks to consumption curbing activities and energy efficiency projects.

**SCOPE 2 EMISSIONS - GROUP**(tCO<sub>2</sub>eq)

■ Italy ■ Brazil ■ Group

Our **Scope 2 emissions<sup>(1)</sup>** derive from the purchase of electricity needed to power our infrastructure and offices. In 2022, we reduced these emissions by **16% compared to 2021 and by 47% compared to 2019**, thanks to the increasing use of renewable energy sources. In Italy, we will reach 100% renewable energy by 2025, while Brazil has already achieved zero emissions in this area since 2021.

**SCOPE 3 EMISSIONS - GROUP**(tCO<sub>2</sub>eq)

■ Italy ■ Brazil ■ Group

Our **Scope 3 emissions** are generated upstream and downstream of our production activities and mainly relate to the **purchase of goods and services** (cat. 1), the **purchase of capital goods** (cat. 2) and the **use of sold products** (cat. 11 calculated only for TIM S.p.A). For these three categories, for which we have a target of reducing emissions by 47% by 2030, **we record a 13% reduction compared to 2021 and a 8% reduction from 2019**. In 2023, the measurement system will be revised to include additional Scope 3 categories.

(1) Emissions were calculated using market based methodology.

(2) The figure differs from that reported in the 2021 Sustainability Report, which also included cat. 6-7.

# Energy efficiency

*We contain consumption through the efficiency of infrastructures and the use of eco-efficient technologies*

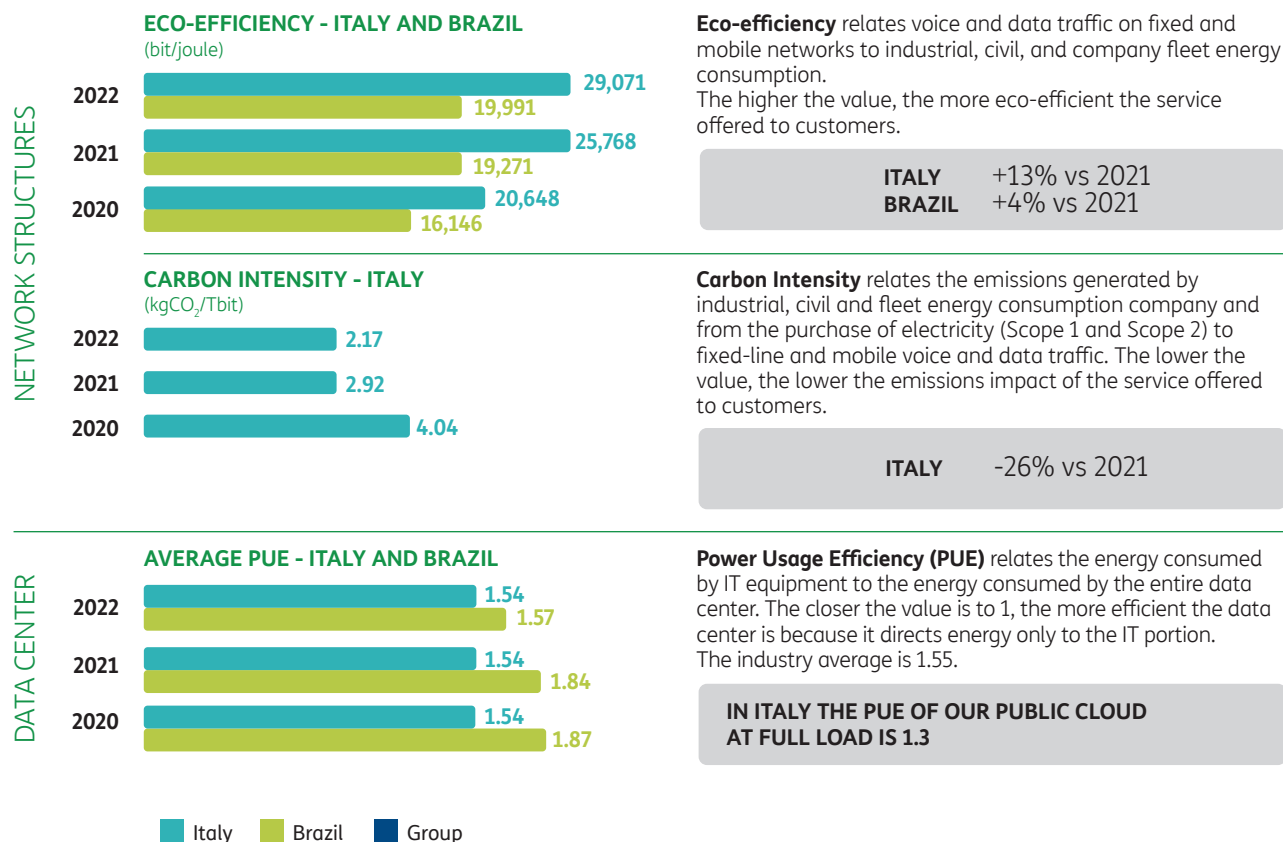
In 2022, we kept the increase in total consumption of energy from fuels, gas, and electricity under control despite the growth in fixed and mobile voice and data traffic and the activity of data centers.

A milestone that we have achieved thanks to the use of technologies that have allowed better performance with the same amount of energy resources.

## INTERNAL ENERGY CONSUMPTION - GROUP (GWh)



## THE EFFICIENCY INFRASTRUCTURE INDICATORS



## Efficiency interventions on infrastructure

Our offices, industrial sites and Data Centers have been structurally rethought to divest spaces and technologies that are no longer functional and to reduce maintenance costs and energy consumption.



### FOCUS ITALY

## OFFICES

We manage around **80 office spaces** with over 50 people in about **50 Municipalities**.

In 2022, the plan for organizing and restructuring the company spaces continued thanks to the **consolidation of Smart working and the Desk Sharing work model**, which rationalized workstations and the use of locations, reducing management costs and energy consumption.

For the **renovation interventions**, we chose sustainable materials such as **100% recyclable flooring used for over 100,000 square meters**, which can be reused at the end of their life, avoiding waste production. As efficiency measures, we began installing sensors to monitor office temperatures



### 10 HABITS FOR A SUSTAINABLE OFFICE

Our behaviors also count toward achieving the 0 emissions goal by 2030! By adopting good office habits all together, in one year we can save up to 540t of CO2 equal to the absorption of about 11,000 trees. \*Estimated value not countable



#### CORRECTLY SEPARATES WASTE

Help us to reduce, reuse, and better dispose of what is not needed

#### DO NOT PRINT UNLESS NECESSARY

Limit paper and toner use as much as possible and use front/back when possible



#### ACTIVATE STANDBY WHEN YOU ARE NOT AT YOUR PC

Use PC Sleep mode and help us minimize energy consumption

#### TURN OFF THE LIGHT WHEN YOU DON'T USE IT

Whenever you can take advantage of natural light and delay turning on the electric light



#### SHUT OFF WATER WHEN IT IS NOT NECESSARY

Be careful to turn off water taps properly, for example, in bathrooms and break rooms

#### REDUCE THE USE OF HAND TOWELS

Protect the environment. Hand towels are not intended for recycling



#### PREFER THE STAIRS TO THE ELEVATOR

Going up the stairs is a good activity that also helps to save energy

#### TURN OFF SCREENS IF YOU ARE NOT USING THEM

Check that they are turned off at the end of each meeting



#### CLOSE WINDOWS IN AIR-CONDITIONED ROOMS

Open windows the minimum time necessary for air exchange

#### TURN OFF THE HEATING WHEN NOT IN USE

Where possible, intervene on the thermostat to turn off the system (e.g., meeting rooms)



BECOME A PROMOTER OF SUSTAINABILITY  
ENCOURAGE COLLEAGUES TO HAVE VARIOUS BEHAVIORS

and more efficient air conditioners. Finally, to promote **sustainable office behaviors**, we launched a **decatalogue with the ten good habits for a sustainable office**.

## FOCUS ITALY

## FIXED AND MOBILE NETWORK

We have about **10,500 industrial sites for our fixed and/or mobile network** in over **6,900 Municipalities**.

In 2022, the energy-saving plan continued, resulting in an overall saving of **approximately 100 GWh/year**.

**Decommissioning** activities led to:

- the switch-off of the 3G network which saved about **20 GWh**;
- the shutdown of obsolete technologies and services (wire broadcasting, dial-up, power feeding of the FTTCab network);
- the rationalization of obsolete Data and Transport Networks and the consolidation of switching centers.

The **energy efficiency** interventions provided for:

- the implementation of a **Building Energy Management System** (BEMS) for the

monitoring of the technological systems of **35 strategic exchanges**. A total of **358 probes** for monitoring micro-climatic conditions, **126 power meters** for energy consumption, and about **150 machines** for powering and conditioning rooms were installed;

- the signing of **“Energy Performance Contracts”** (EPCs) to optimize the management of technological facilities in **48 exchanges**;
- the improvement of energy performance of over **458 air conditioners** in **53 exchanges**;
- the use of **high-efficiency cogenerators** for self-production of energy for refrigeration and air conditioning units.

Thanks to the energy savings produced, about **14,000 Energy Efficiency Certificates** have been issued with an economic value of about 3.8 Mln€.

## 2022 SAVING

## DECOMMISSIONING

	Fixed	Mobile
ENERGY	<b>-30 GWh</b>	<b>-20 GWh</b>
COSTS	<b>5.8 Mln€</b>	<b>3.9 Mln€</b>
EMISSIONS	<b>-12,639 tCO<sub>2</sub>eq</b>	<b>-8,426 tCO<sub>2</sub>eq</b>

## EFFICIENCY

ENERGY	<b>-50 GWh</b>
--------	----------------

## ENERGY EFFICIENCY CERTIFICATES

No.	<b>about 14,000</b>
REVENUES	<b>3.8 Mln€</b>



## FOCUS ITALY

## DATA CENTERS

We manage **16 Data Centers in 8 cities** that guarantee the maximum levels of operation, security and energy efficiency.

**Design criteria**

The “Public Cloud” Data Centers built in 2021-2022 are designed with eco-sustainable criteria, including building materials that are free of pollutants, lighting systems that reduce light pollution, and eco-friendly paints.

**Efficient management**

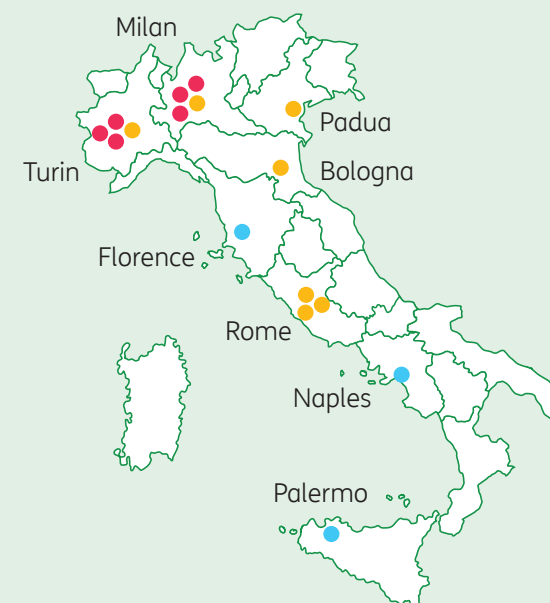
In the “Core” Data Centers, interventions continue to optimize room cooling and lighting, to renovate continuity systems (UPS) and conditioning systems,

with an average energy saving of about **2.8 GWh/year**.

In addition, interventions were carried out on the **IT infrastructure**, resulting in an average energy saving of about **13.5 GWh/year**.

**Certifications**

Overall, more than 100 certifications **attest to the efficiency, sustainability, and safety** of the sites. These include ISO 50001 for the energy management system, ISO 14001 for the environmental management system, ISO 27001 for information security management, and LEED Gold for the eco-sustainability of building design and construction.

**6 Data Center Core**

that offer cloud and collocation services with the highest performance

**7 Data Center Public Cloud**

where platforms of the most relevant public cloud providers operate

**3 Service centers**

i.e., secure and reliable micro data centers located near customer sites



## The company fleet

The interventions on our company vehicle fleet focus on optimizing management costs and reducing fuel consumption.

### FOCUS ITALY

We manage **12,500 vehicles** including **10,000 work vehicles**, **2,300 cars for mixed-use**, and **200 cars in car sharing**.

**Work vehicles:** are used by technicians for maintenance and fiber installation interventions. In 2022, a project was launched to optimize the vehicle fleet, which will continue in 2023 with the **reduction of 1,000 vehicles**.

**Cars for mixed-use:** demand for electric/hybrid cars grew to **22%** with a six-monthly renewal of

the Car List to have cars that comply with the latest European emission regulations.

**Vehicles in car sharing:** replacement plan with Full Electric powered cars continued, involving **13 cities** and **25 corporate locations** for a total of **50 vehicles**.

To encourage the use of electric/hybrid cars, in 2022 we installed **47 electric charging stations** in **13 cities** and **31 locations**, with an increase of **24% compared to 2021**.

### TYPES OF VEHICLES

#### WORK VEHICLES

19%

81%

#### VEHICLES FOR MIXED-USE

16%

22%

62%

#### VEHICLES IN CAR SHARING

75%

25%

■ Petrol  
■ Electric/hybrid  
■ Diesel



# Electricity

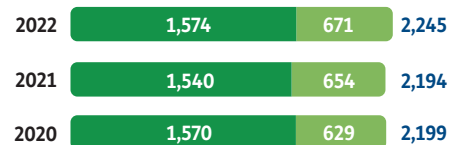
*We increase the purchase of electricity from renewable sources and invest in self-production*

The electricity that powers our exchanges and data centers is mostly purchased and to a small extent self-produced by trigeneration, generator sets and photovoltaic plants.

We increasingly rely on the use of energy from renewable sources, both purchased and self-produced, with the goal of achieving 100% green electricity by 2025. In 2022, electricity from renewable sources accounted for **61% of the Group's total electricity**. In Italy, the percentage reached **45%**, while in Brazil arrived to **98%**.

## PURCHASE AND SELF-PRODUCTION OF ELECTRICITY - GROUP

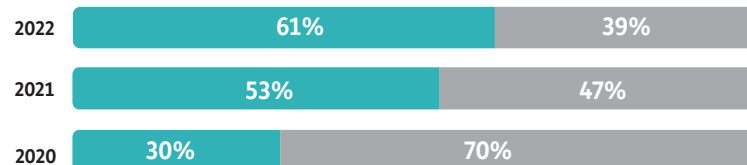
(GWh)



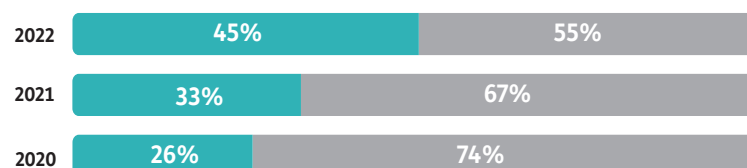
■ Italy ■ Brazil ■ Group

## ELECTRICITY MIX

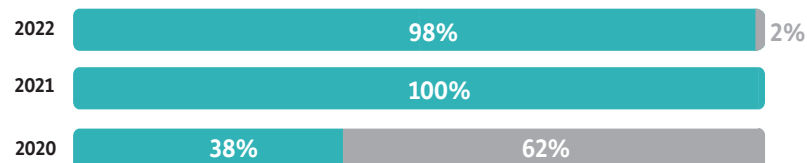
### GROUP



### ITALY



### BRAZIL



■ Renewable sources ■ Mixed sources



## FOCUS ITALY

## RENEWABLE ENERGY SOURCES

## ENERGY PURCHASE

In 2022, renewable energy from **Guarantees of Origin<sup>(1)</sup>** (GO) and from **Power Purchase Agreements** (PPA) covered 45% of TIM's total electricity consumption amounting to approximately **710 GWh<sup>(2)</sup>**.

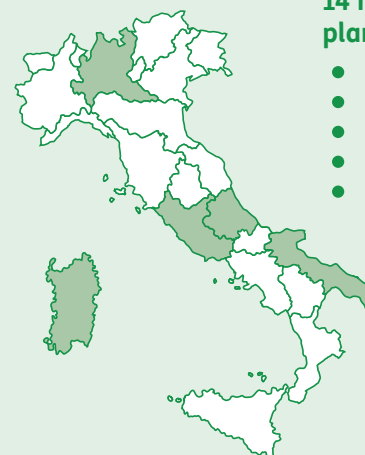
In 2021, we signed a ten-year **corporate Power Purchase Agreement (PPA)** with ERG for the supply of **340 Gwh/year** of renewable energy from wind farms.

## SELF-PRODUCTION

In 2021, we also launched a plan to install **14 photovoltaic plants** with a capacity of about **0.7 GWp**. We also started **the restoring of 101 existing small-scale plants** in the country with a capacity of about **0.9 GWp**. For these plants, self-production will be calculated starting from 2023.



- Noovle Data Centers
- Offices
- TIM Retail Stores
- Sparkle Plants in Italy



## 14 new self-production plants

- 1 in Lombardy
- 6 in Lazio
- 3 in Abruzzo
- 3 in Apulia
- 1 in Sardinia

(1) Guarantees of Origin are electronic certificates that attest to the renewable origin of the sources used.

(2) The data refers to energy calculated at the PoW (Point of Withdrawal) and corresponds to 757 GWh at the PoI (Point of Injection).

(3) An equal quantity of Guarantees of Origin has been allocated for the energy consumed by the indicated perimeters.

# Circular economy and resource efficiency

*We adopt processes to avoid waste and transform it into value*

## Waste reduction and valorization

The company's environmental impact also depends on responsible use of products and materials, waste reduction, and their transformation into **economic resources**. To measure our ability to transform waste into value, we have introduced the **"Circular Economy Ratio"**, an index that relates revenues from waste recovery and resale of unused goods and materials to the total waste production<sup>(1)</sup>.

In 2022, the indicator reached a value of **0.3€/kg**, an increase of **0.26€/kg** compared to 2021, thanks to lower waste production and an increase in the resale of waste and unused goods, which generated **2.4 million euros in revenues** (2 million euros more than in 2021).

### THE CIRCULAR ECONOMY RATIO (€/kg)

Revenues from waste recovery + Revenues from resale of unused goods and materials

Total amount of waste produced

**2022 Closing**  
0.3€/kg

**Tgt 23-25**  
2€/kg

(1) The reference scope for the calculation of the Circular Economy Ratio includes the following companies: TIM SpA, Sparkle Italia, TIM Digital Services, Noovle and Olivetti.



Our waste production shows a variable trend over time linked to the cyclical nature of some activities such as the decommissioning of network infrastructures and data centers or office reorganization. However,

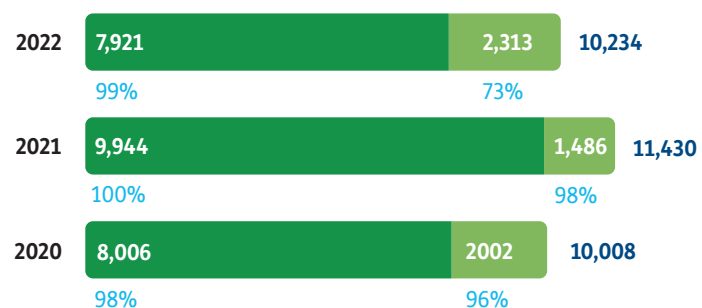
the percentage of products and materials sent for recovery remains high and stable.

Our commitment is to strengthen the control of the production chain. That's why, in 2022, we reviewed

the main waste management contracts, requiring our suppliers to have EoW (End of Waste) certification and a report with evidence of the percentage of recycled waste.

### WASTE PRODUCTION - GROUP

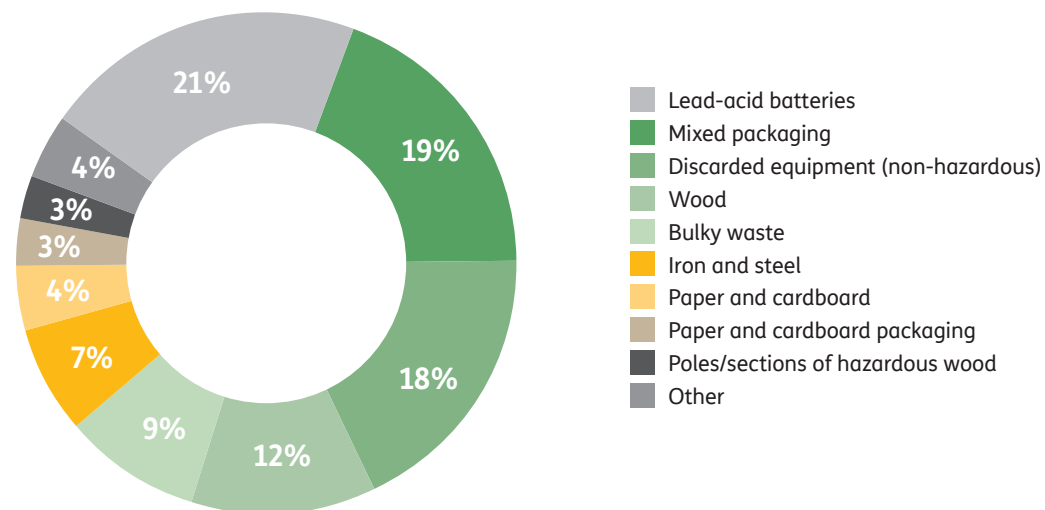
(tons)



■ Italy ■ Brazil ■ Group ■ % Waste sent to recycling/recovery

### FOCUS ITALY

#### MAIN TYPE OF WASTE



The graph considers the perimeter adopted for the Circular Economy Ratio, which differs slightly from that adopted by the GRI 306-3 for Italy.



## Donation of unused company goods and resale of materials

### FOCUS ITALY

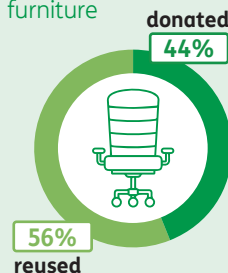
#### DONATIONS OF COMPANY FURNITURE AND EQUIPMENT

The evolution of smart working and desk sharing has made a part of the furnishings and IT equipment no longer essential.

In 2022, we recovered **about 5,400** pieces of furniture and company equipment, donating over **1,200** items to non-profit organizations that allowed us, among other things, to set up a nursing school in Dakar, Senegal and provide IT equipment for educational support of low-income families.

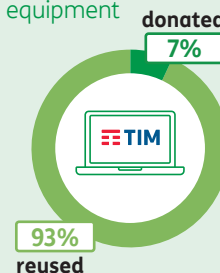
We donated one of our disused pylons to the **National Alpine and Speleological Rescue Corps** of Belluno for the construction of a radio bridge and a parking area for hikers and specialized personnel. The sale also allowed us to avoid the costs of decommissioning and disposal of the supporting structure which, among other things, would have involved the use of a helicopter for transportation.

Over **2,400** pieces of recovered furniture



**-83t** of waste thanks to the regeneration and reuse of goods

**3,000** pieces of recovered computer equipment



Over **1,200** donated goods to non-profit organizations

**-1,200 tCO<sub>2</sub>eq** correspond to a car that travels around the world about 170 times

### FOCUS ITALY

#### RECOVERY OF NETWORK EQUIPMENT AND MATERIALS

In 2022, we started a path **of valorization** of technological waste through the resale of equipment and materials through specialized brokers. The sale concerned:



##### DISUSED NETWORK EQUIPMENT

(exchanges, base stations) for the recovery of precious metals and other raw materials. Approximately **1,500 tons** of material were recovered, with **600,000 euros** in revenue.



##### DISUSED COPPER CABLES

generated a total revenue of **1,250,000 euros**.



##### SERVERS AND TELECOMMUNICATIONS EQUIPMENT

generated a revenue of about **150,000 euros**.

## Attention to resource consumption

We reduce the consumption of natural resources such as water and materials such as paper and plastic to contain waste and promote sustainable behaviors in the Company.

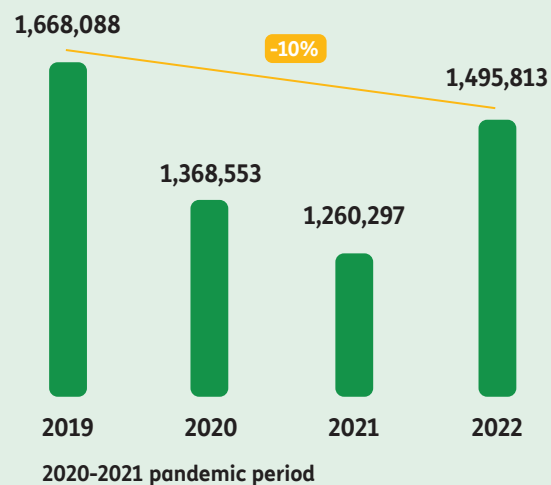
### FOCUS ITALY

#### WATER

In 2022, we consumed 1,495,813 m<sup>3</sup> of water, **80%** of which was allocated for **civil use** and 20% for **industrial use** (trigeneration and cooling).

#### WATER CONSUMPTION

(m<sup>3</sup>)



#### PAPER

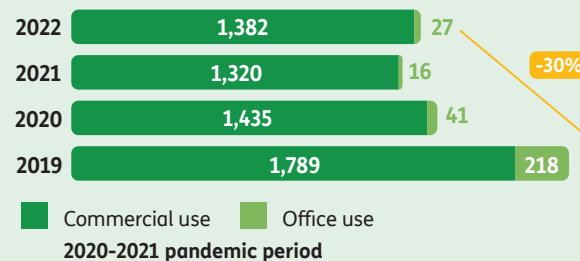
We purchase paper for office and commercial use. On the commercial front, we aim at a progressive digitization of bills, commercial contracts and our archives.

In 2022 we collected **about 5 tons of high-quality and mixed paper** following the reorganization of our offices, which was then recovered as a secondary raw material. We use paper produced according to the requirements of the **Forest Stewardship Council (FSC)**.



#### PAPER CONSUMPTION

(tons)



#### PLASTIC

In 2022 the plastic waste generated by our activities amounted to approximately **59 tons**. To reduce the environmental impact of plastic, we added **Sustainable SIM CARDS** to our product range, saving about **8 tons** of plastic in 2022.



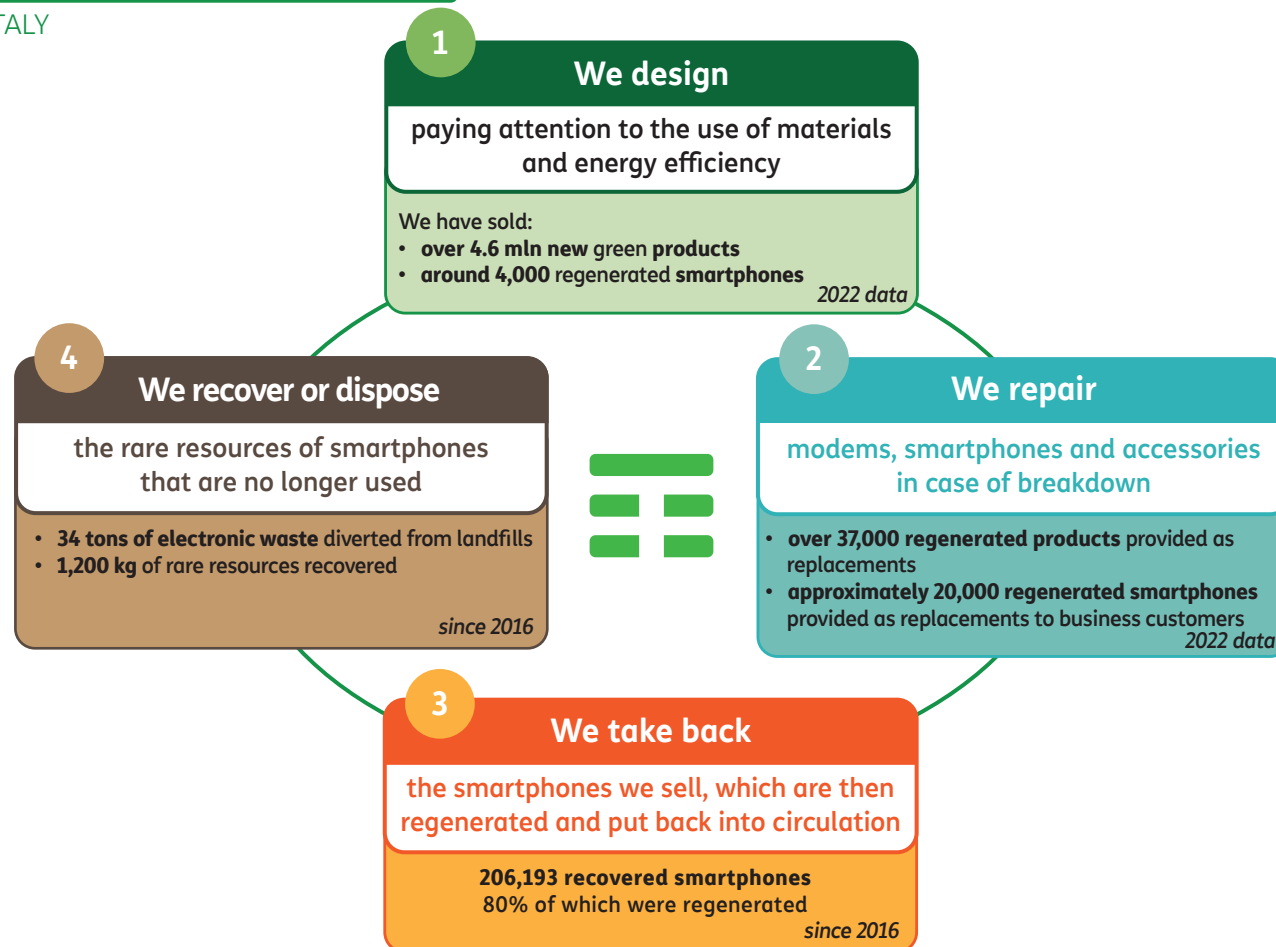
We installed **25** water dispensers in **9** corporate locations to reduce the use of plastic bottles. Water dispensers will also be gradually installed in the corporate canteens.

# TIM Green

*We offer products and services with a low environmental impact*

## TIM GREEN CIRCULAR APPROACH

ITALY



## All-Risk Assistance Service

2

This service allows business customers to replace their device in case of failure or malfunction, or request its replacement in case of theft or loss.

## TIM Next

3

4

With this service, you buy a smartphone in installments and, after one year, you can choose to either keep or return it. The device is regenerated to be put back on the market or disposed of by recovering its parts.

## TIM Smartphone Revalue

3

4

With this service, you replace your smartphone getting a discount on financing for the purchase of a new one. The old smartphone is regenerated or disposed of by recovering useful parts.

## PRODUCTS SOLD AND REPLACED

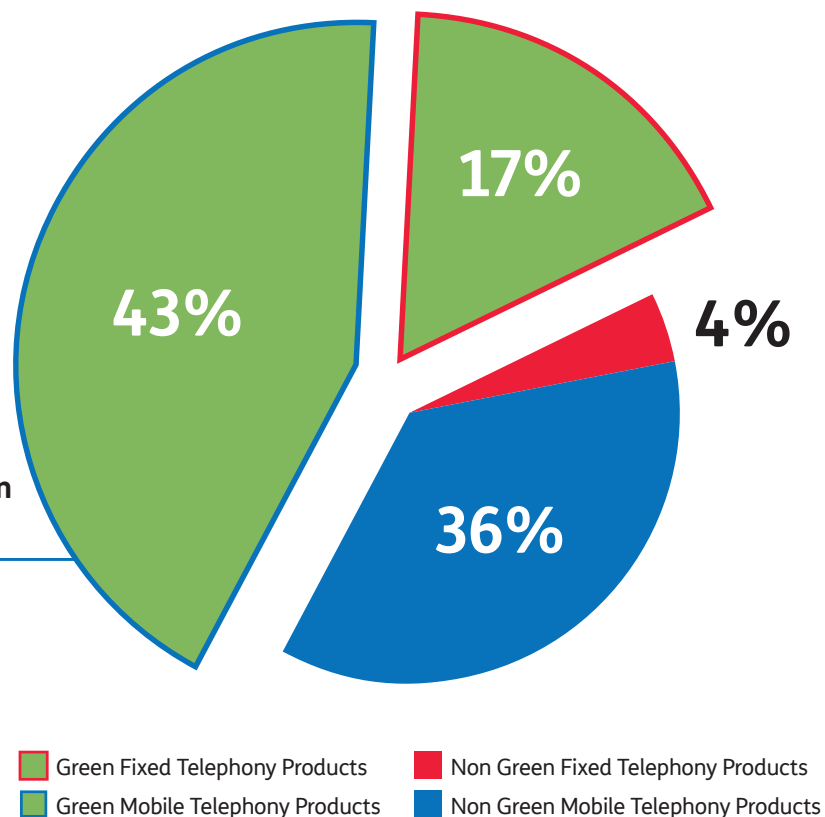
ITALY (number of pieces)

**7.7** million products,  
of which:

**1.6** millions of fixed  
phones products

**6.1** millions of mobile  
phone products

includes **3.2 million**  
Green SIMs



**2022 CLOSING**  
**60%**  
Green products

**TGT 23-25**  
**≥ 70%**  
Green products by 2025

2022 data

To encourage environmentally conscious purchasing choices we have dedicated a section on our commercial website, TIM.it, to the TIM Green products and service range. Sustainability is also relevant for the management of our **216 proprietary stores**. Today, our stores manage customers digitally, use recyclable and recycled paper shopping bags, and are powered by 100% renewable energy<sup>(1)</sup>.

(1) Guarantees of Origin have been allocated for the energy consumed by TIM Retail stores.

## FOCUS ITALY

## WE OFFSET THE EMISSIONS GENERATED BY THE USE OF OUR WEBSITES

In 2022, we continue to neutralize the CO<sub>2</sub> emissions generated by **over 680 million page views** on our main commercial and institutional **websites** in collaboration with **Rete Clima**, a non-profit organization.

We have compensated for **554 tCO<sub>2</sub>eq**, equivalent to approximately **78 trips** around the world by car, corresponding to the energy consumption of the servers hosting the websites and the services that make them work.

We offset CO<sub>2</sub> emissions with the international project “**The Envira Amazonia**” REDD+ for the

conservation of an area of about 39,000 hectares of Amazon rainforest in Brazil. The project promotes the protection of local flora and fauna biodiversity and supports local communities with social programs for the collection, transportation, and sale of medicinal plants.

*The CO<sub>2</sub>web® calculation methodology is verified by the ICMQ Certification Body.*

*The project is certified according to the VCS-Verra standard, validated and verified according to the CCBS-The Climate Community and Biodiversity Standards with Triple Gold Level Distinction.*





# Sustainable Supply Chain

*We select suppliers by evaluating their commitment to sustainability*

Transparency, cooperation, free competition, respect for human rights and quality are the values underlying relationships with our suppliers.

We have also embarked on the path toward a Sustainable Supply Chain with the intention of growing over time the environmental economic and social value of this relationship.

## TIM SUPPLY CHAIN KEY NUMBERS

ITALY

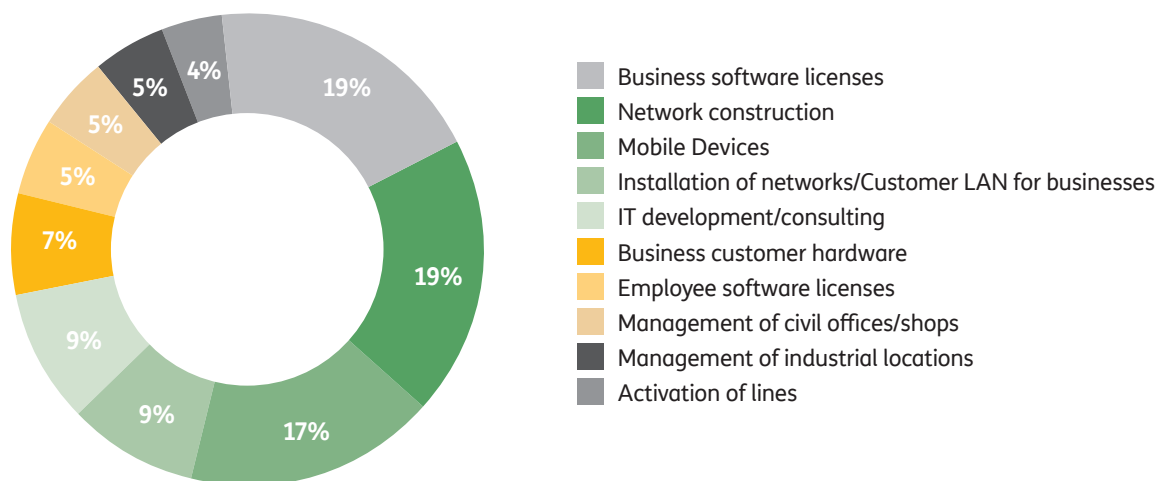
**2,813**
TIM Suppliers<sup>(1)</sup>
**632**

newly acquired suppliers in 2022

**16,100**
number of purchase transactions<sup>(2)</sup>
**5,749** MLN€

value of purchases

## THE TOP 10 CATEGORIES OF PURCHASED PRODUCTS AND SERVICES



(1) Active suppliers with ordered and expected delivery in 2022.

(2) Orders and contracts.

The sustainability of the supply chain reduces Scope 3 emissions, considering that purchases account for over 80% of the company's total emissions, and **improves market performance** by stimulating suppliers to seek efficient, innovative, and low-emission impact solutions. We have included **ESG control elements** in all phases of the purchasing process.



## SUPPLY CHAIN PROCESS

2

## SUPPLIER QUALIFICATION

In the management of our **suppliers**, we identify those at **ESG risk** based on the geographical areas where they operate (Asia, Central and on the South America, North Africa, Eastern Europe) and potential violations related to the environment, human rights, and labor. These suppliers fill out an ESG questionnaire to access our registry.

In 2022, we became a **Value Chain Partner** of the **Open-es** alliance, which, through a platform and an ESG evaluation system based on international standards, will allow us to extend ESG evaluation to all suppliers using shared sustainability criteria.

Suppliers at ESG risk  
% on total suppliers

**690**  
**19%**



TIM suppliers registered with questionnaire

**921**

## SUPPLY CHAIN PROCESS

3

4

## MANAGEMENT OF PURCHASE REQUESTS AND TENDERS

We have introduced a checklist of **30 parameters (eco-standard guidelines)** to include sustainability purchase requests of products and services. In tenders, in addition to technical and price evaluations,

we have included **a sustainability grid with a weight of up to 10%**, which considers the ESG parameters of the product/service included in the purchase request.

## EXAMPLE - PURCHASE REQUEST FOR RADIO BRIDGES

✓ 26 out of 30  
parameters applied

✓ Tender weight 10%

CERTIFICATIONS/  
ENVIRONMENTAL  
LABELS

ISO14001 certification or EPD (Environmental Product Declaration) for the product

## PACKAGING

Packaging made from 100% recycled material and which is 100% recyclable

MODULARITY  
AND MARKING

Modularity and marking of 100% of components to maximize the product's lifespan

ENERGY  
PERFORMANCE

Low energy consumption (e.g., during the night) and product power supply with efficiency not lower than 97% at full load

## END OF LIFE

Product Take-Back program for the recovery of materials and resources at the end of life

## SUPPLY CHAIN PROCESS

5 6

## CONTRACT FORMALIZATION AND EXECUTION

In contracts, we include standard clauses that require suppliers to comply with the **TIM Code of Ethics**. In addition, we are starting to include specific **ESG clauses** for the purchased product/service.

## EXAMPLES OF ESG CONTRACTUAL CLAUSES FOR TECHNOLOGICAL WASTE

We request EoW (End of Waste) certification, recyclability percentage, and recycling reports

We reserve the right to terminate the contract in case of non-compliance with even one of the environmental protection clauses

We evaluate supplier performance based on audits to verify the technical compliance of technical characteristics of products or service performance. The results are summarized in Vendor Rating indicators that, if negative, result in order modulations or exclusion from tenders.

## EXAMPLES OF ESG ELEMENTS FOR VENDOR RATING

Contract for Access and Transport Network Works in copper and fiber optic: **safety and environmental** aspects are taken into account

Contracts for fixed and mobile products: are checked to verify the **energy consumption** parameters

## SUPPLY CHAIN PROCESS

7

## EXTERNAL AUDITS

Thanks to the Joint Audit Cooperation (JAC), a voluntary association founded in 2010 by TIM, Orange and DeutscheTelekom<sup>(1)</sup>, we address and monitor the applicability of the principles of Corporate Social Responsibility in the telecommunications supply chain, with a win-win approach for suppliers and operators.



(1) The alliance was subsequently joined by: 2011 Proximus, KPN, Swisscom, Vodafone Group; 2012 Telenor and Telia Company; 2013 Verizon; 2016 AT&T Telefonica; 2018 Mobile Tele System and Telstra; Telstra; 2019 Elisa OYJ; 2021 TDC, MTN British Telecom; 2022 NTT.

## MAIN ACTIVITIES

- **Social and environmental audits** on the supply chain of common suppliers
- **Workshops on Scope 3, zero waste, circular economy, and human rights** to implement shared solutions
- **Capacity building** activities for suppliers

## KEY NUMBERS

- **27 members from 16 different countries**, representing over 51% of the Top 50 worldwide
- On-site verifications in **45 countries** since 2010
- **910 Audits<sup>(2)</sup>** conducted (including 98 in 2022)
- Over **1.5 Mln workers** in total are involved

(2) It includes Audits 3rdparty, VAP Audits, Workers' Surveys and Remote Audits

# Employee mobility

*We implement solutions to reduce the impact of travel*

Over **40,000** TIM employees located in over **650 offices in 200 Italian Municipalities** generate daily commutes comparable to those of a small Italian city, with consequent impacts in terms of CO<sub>2</sub> production.

The obligation since 2021<sup>(1)</sup> to draw up a Home-Work Commuting Plan (PSCL) has involved administering a questionnaire to employees to collect data on their commuting habits, offering at the same time the opportunity to identify interest in sustainable transportation modes and evaluate initiatives for mobility management. Thanks to the input received from our colleagues in 2021, we have restored shuttle services to corporate locations that are difficult to reach, installed **75 bike and scooter racks** in **26 offices** and tested a carpooling service.

## THE MOBILITY SURVEY

ITALY

**38.4%**

responses to the survey

### FINDINGS FROM THE SURVEY

**40.8**  
Average Km

traveled per day per employee

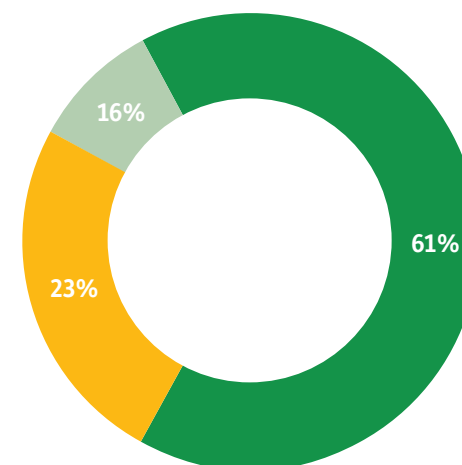
**78,000**  
tCO<sub>2</sub>eq

issued in 1 year for travel

**19,300**  
acres of forest

needed to offset emissions

## MEANS OF TRANSPORT USED FOR HOME-WORK COMMUTE



- Private transportation**  
(private or shared car, private or shared scooter, motorcycle, company car)
- Public transportation**  
(one or more public transport solutions, combination of public and private means, company shuttle)
- Soft mobility**  
(traditional and electric bicycle, scooter, walking, carpooling)

(1) The activity is provided by the Interministerial Decree No. 179 of May 12, 2021, issued by the Ministry of Ecological Transition in synergy with the Ministry of Infrastructure and Sustainable Mobility, and provides for the drafting of a survey for all companies with more than 100 employees located in Municipalities with more than 50,000 inhabitants.



## FOCUS ITALY

## CARPOOLING PROJECT

At the end of 2022, we launched a pilot project for the use of carpooling services in **Naples, Rome, Florence and Milan**, with the goal of making **urban transportation more intelligent and greener**.

The service was developed by the **startup BringMe**, the winner of the **TIM Challenge for Circular Economy**, with the aim of promoting behaviors based on a circular economy model.

With the **“JOJOB Real Time Carpooling” App**, users can view people who have a compatible route and book carpool rides, sharing the expenses.

We also associated the service with a **cashback campaign** that awards credits to the users for each carpool ride taken, which can be used for new trips or to obtain vouchers for shopping or fuel.



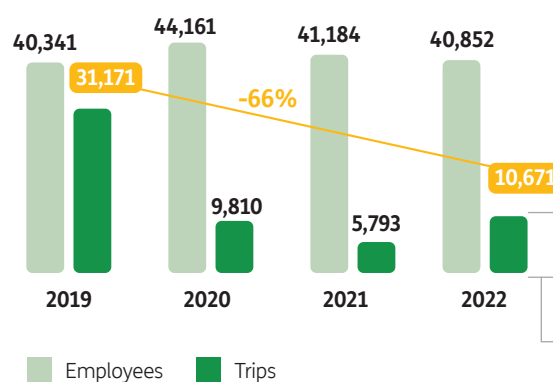
## Business trips

In 2022, there were more than **10,600 business trips**, representing a **66% decrease** compared to the pre-pandemic year of 2019.

The result is the outcome of the new policy on travel, which discourages non essential trips and favors the use of trains over planes.

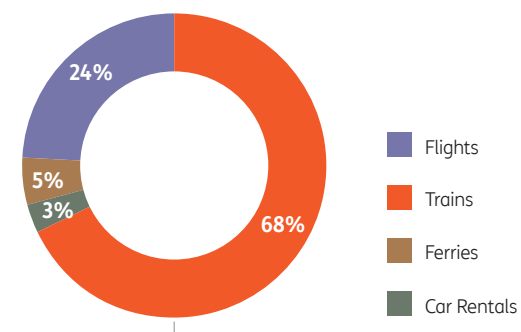
## TRIPS

ITALY



## MEANS OF TRANSPORT USED

ITALY



# Biodiversity

*We collaborate on projects for the preservation of the natural environment*

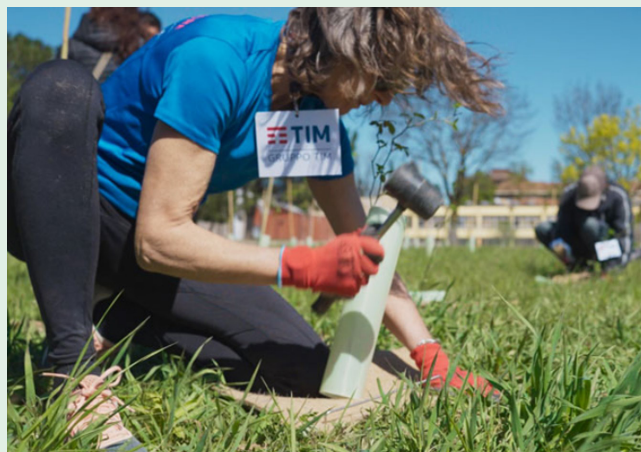
In 2022, we launched projects for the preservation of biodiversity in Italy through a partnership with Rete Clima<sup>(1)</sup>.

(1) Rete Clima, a non-profit organization specialized in promoting sustainability in companies.

## FOCUS ITALY

### SUSTAINABLE FOREST MANAGEMENT

In the **Parco Nord of Milan**, **150 new plants and shrubs** typical of the Po Valley<sup>(2)</sup> were planted to contribute to the increase of green areas in the city. The planted trees will absorb around **50 tCO<sub>2</sub>eq** in their average lifespan of 30 years.



In **Città della Pieve-Piegara** in Umbria, we implemented the **“Elite Plants”** project to **preserve forest biodiversity**, which allowed us to identify and map rare and valuable plants through GPS and promote their growth through specific management techniques.



(2) Projects carried out according to the Foresta Italia® Protocol of Rete Clima and with the moral patronage of the Ministry of Ecological Transition and the Ministry of Agriculture, Food and Forest Policies.

# SOCIAL

DIGITAL GROWTH .....	40
TIM PEOPLE .....	49
ACTIVITIES IN THE SOCIAL FIELD .....	61



# DIGITAL GROWTH

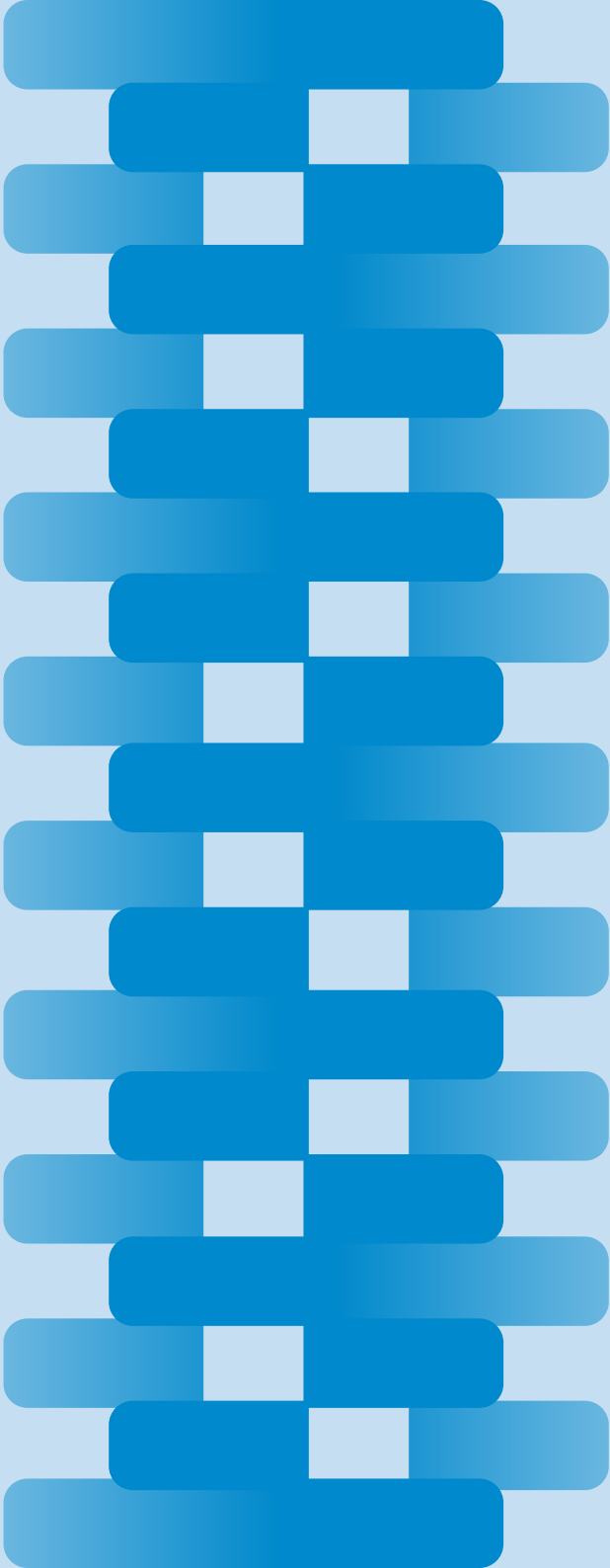
Development of ICT infrastructures ..... 41

Digital solutions for business growth  
and sustainability ..... 42

Digital identity services ..... 44

Public sector transformation projects ..... 45

Tools to support digital innovation ..... 48





# Development of ICT infrastructures

## *We enable connectivity and digitization with ultra-broadband networks and Data Centers*

Digital growth produces benefits for the economy, society and the environment. For this reason, we are focused on building a **digitalized and sustainable Italy** through innovative infrastructures and digital solutions that make people's lives easier and transform the way that businesses and public administration operate. This vision, which is reflected in our Industrial Plan, contributes to creating a more livable and inclusive society.

### THE FIXED ULTRABROADBAND NETWORK

**94.5%**

of the fixed lines  
FTTC and/or  
FTTH-enabled

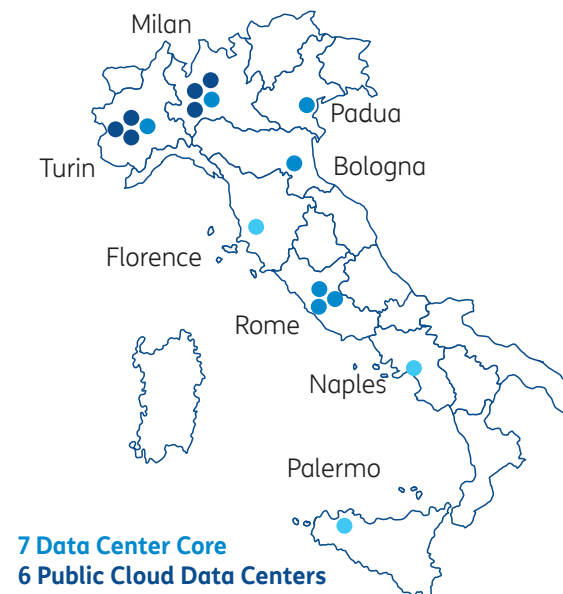


**76.4%**

of households with an  
FTTC-enabled fixed network  
in white areas



### DATA CENTERS



**7 Data Center Core**  
**6 Public Cloud Data Centers**  
**3 Service Centers**

50,000 square meters of system rooms  
IT available power of around 50MWh

### THE MOBILE ULTRABROADBAND NETWORK

**99%** of the population  
covered by 4G

**5G** ITALY'S FASTEST  
NETWORK IN THE 5G  
EXPERIENCE ACCORDING  
TO OPEN SIGNAL



# Digital solutions for business growth and sustainability

*Revenues from digital services and connectivity grew more than the market average*

Through **TIM Enterprise**, we lead companies and Public Administration towards digital transformation, offering services that improve the efficiency, safety and resilience of their business while reducing their environmental impact. A growth opportunity for the economy of Italy as a whole.

- **Cloud services: to get the most out of IT while minimizing the environmental impact**

With the Cloud, companies and Public Administration get maximum computing power and security, but also lower energy consumption and CO<sub>2</sub> emissions, thanks to economies of scale and optimized energy use in our Data Centers.

## TIM ENTERPRISE REVENUES

	2022 VS 2021	MARKET TRENDS
Connectivity	-2%	-4%
Cloud & Smartworking	+54%	+23%
IoT	+11%	+9%
Security	+41%	+14%
Other services	-11%	-4%
<b>Total Revenues</b>	<b>+8%</b>	<b>+5%</b>

For these services there is a target in the 23-25 Plan



- **Smart Working & Collaboration services: more efficiency for companies and more time for people**

Thanks to Smart working, companies reorganize spaces by reducing lighting, heating and air conditioning consumption. It decreases CO<sub>2</sub> production related to energy consumption and home-office travel. People have greater flexibility in organizing their time.

- **Security services: safety for a solid economy**

Companies that invest in the security and resilience of their IT networks protect themselves from potential financial and reputational costs and contribute to the solidity of the national economy.

- **IoT services for the Smart City: smart data for a more livable, safe and sustainable city**

Digital technology can transform cities into places that are more welcoming and safe for citizens, and simpler and more efficient for administrators. In 2022, through Olivetti, we acquired the **Urban intelligence Mindicity platform**, which provides digital solutions for Italian municipalities.

- **IoT services for Smart Agriculture and Smart Industry: improving productivity and minimizing environmental impact**

Data collection from the ground and the air using IoT sensors, enrichment with data from other sources and analysis using Artificial Intelligence, allow you to decide, for example, if and when to irrigate or use pesticides.

The same methodology is applied in industry to control production factors.

- **IoT services for E-Health: more accessible treatments for patients and more sustainable costs for the healthcare system**

With digital health solutions, **medical checkups** become simpler and faster for patients and more **sustainable** for healthcare facilities by reducing time and optimizing the use of space.

# Digital identity services

*We simplify the relationship between citizens and Public Administration*

We develop **digital identity and validation solutions** for people and things, including SPID, PEC and Digital Signature.

- The public digital identity system **SPID** (Sistema Pubblico di Identità Digitale) provides all citizens and businesses with a single, safe and secure access to the digital services offered by Public Administration and associated private operators, allowing them, for example, to recover their documents online or to carry administrative formalities remotely;
- Certified electronic email or **PEC** (Posta Elettronica Certificata) allows the sending of e-mail with the same legal value as a registered letter with return receipt;

- **Digital Signature** is the electronic equivalent of the traditional handwritten signature on paper and allows documents to be exchanged online with full legal validity, guaranteeing the integrity, authenticity and non-refusal of the electronic document on which it is affixed.

The services are provided by **Trust Technologies**, a Group company accredited as a provider of qualified trust services according to European legislation.

In 2022, active digital identity services grew by 31% compared to 2021, more than expected by the Plan target (+15% CAGR as of 2024).

2022 Closing  
**+31%**  
active services  
vs 21

Tgt 23-25  
**+30%**  
active services  
by 2025 - CAGR

**over 5 million**  
of SPID Authentications  
made in one year

**over 1.2 million**  
Digital Identity Users

**more than 2.5 million**  
certified electronic e-mail  
per day

**more than 200 million**  
Digital Signatures  
affixed per year

# Public sector transformation projects

*We enable more efficient and inclusive management of public services*

In 2022, we took part in public tenders funded by the **NRRP** (National Recovery and Resilience Plan) to complete the fiber coverage of the country by winning:

- Six lots in the **“Italia 1 Giga”** tender process, corresponding to **1.2 million real estate units** to be provided with fiber optic connections in gray areas<sup>(1)</sup>;
- all the lots in the **5G Backhauling** tender which will enhance 5G technology by providing a fiber optic connection for more than **11,000 mobile**.

We were also awarded four lots in the **“Connected Schools”** tender, two lots of the **“Connected Healthcare”** tender and, lastly, the tender to create the **National Strategic Hub**, the Cloud infrastructure of the Public Administration.

<sup>(1)</sup> Areas in which an operator providing super-fast broadband connectivity services invests or will invest in the next three years.

## CONNECTED SCHOOLS WITH AT LEAST 1 GBIT/S



*Project for digitization, innovation and security in Public Administration funded by the National Recovery and Resilience Plan*

In June 2022, we were awarded **four lots of the “Connected Schools” tender** to provide fiber coverage and supply connectivity to approximately **5,900 schools** with symmetric speeds of at least 1 Gbps by June 30, 2026.

The call for tenders targeted nearly 10,000 school sites throughout Italy including lower and upper secondary schools and, in “white areas”, also primary schools and kindergartens.



1. Piedmont	4. Tuscany	7. Calabria
2. Liguria	5. Lazio	8. Sicily
3. Aosta Valley	6. Campania	9. Sardinia

## CONNECTED HEALTHCARE WITH AT LEAST 1 GBIT/S AND UP TO 10 GBPS



*Project for digitization, innovation and security in Public Administration funded by the National Recovery and Resilience Plan*

In June 2022, we were awarded **two lots** of the “**Connected Healthcare**” tender for fiber coverage and the supply of connectivity to approximately **3,100 diversified healthcare facilities** (from outpatient clinics to hospitals) with symmetrical speeds of at least 1 Gbps and up to 10 Gbps.

The work involves the supply and installation of the access network and operation, technical assistance and maintenance services.

Infrastructure work must be completed by June 30, 2026, guaranteeing connectivity services for at least the next five years.

The call for tenders targeted more than 12 thousand public health service facilities nationwide.



1. Lombardy

2. Emilia  
Romagna

3. Marche

## PUBLIC ADMINISTRATION IS MORE EFFECTIVE AND SECURE WITH THE CLOUD



*Project for digitization, innovation and security in Public Administration funded by the National Recovery and Resilience Plan*

In August 2022, through the **National Strategic Hub** set up with Sogei, Leonardo and Cassa Depositi e Prestiti, we signed the Convention for the design, implementation and management of the **Cloud infrastructure that will host the critical and strategic data of Central Public Administrations, Local Health Authorities (ASL) and local Public Administrations**. The goal is to have 75% of Italian administrations using Cloud services by 2026. We will provide 4 Data Centers powered by 100% renewable energy, interconnected through the new Virtual Data Center Network (VDCN) and built to the highest security and business continuity standards. In collaboration with Leonardo, we will develop advanced technology solutions for the Public Administration on this IT infrastructure.

## DIGITAL SOLUTIONS TO ENHANCE CULTURAL HERITAGE

We collaborate with Italian museums and archaeological parks to build **new models of operational and economic management of cultural heritage** by combining different digital tools:

- **monitoring** control room to prevent and manage critical events such as fires, flooding and vandalism;
- digital platforms for the **end-to-end management of services** for visitors (ticketing, digital shopping, feedback collection);
- technologies to **amplify visitor engagement** with three-dimensional reconstructions of places, integration of missing architectural or artistic elements, geo-referenced audio and video narratives, and visual and sound effects;
- **platforms** for **streaming** digital events and exhibitions to provide barrier-free enjoyment.

### TIM AND THE ARCHAEOLOGICAL PARK OF POMPEII



We are collaborating with the Archaeological Park of Pompeii to digitize the artistic and cultural heritage.

In October 2022 with a **concert-event dedicated to Pink Floyd**, we realized a new way of enjoying the archaeological site, offering spectators an artistic performance that combines the past with the present and an **Extended Reality experience** thanks to 5G technology.



# Tools to support digital innovation

*We pursue technological innovation to increase the value offered to our customers*

As at December 31, 2022, our portfolio contains approximately **2,800 patents**.

Throughout the year, we deployed our innovation efforts through a multitude of instruments:

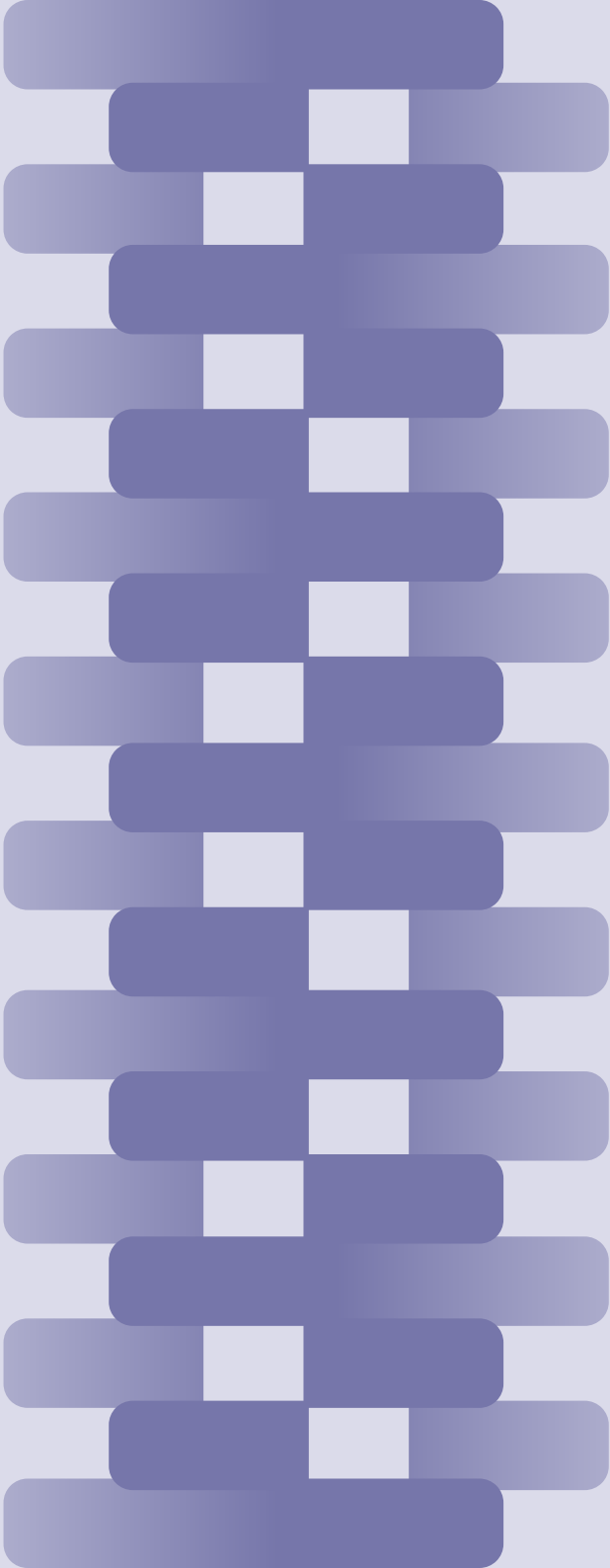
- more than **20 projects** managed by our four **TIM Innovation Labs** focused on the evolution of the 5G standard, Open Ran, Edge Cloud, Quantum Technologies and Optical Technologies;
- **research contracts with 5 Italian universities** (University of Turin, Polytechnic University of Turin, Scuola Superiore Sant'Anna of Pisa, State University of Milan, University of Catania);
- **30 PhD scholarships** financed at several universities scattered throughout the country;
- **16 European research projects** (Horizon 2020, Horizon Future, DEP-Digital European Platform, CEF-Connected European Facilities programs);
- **3 innovation challenges** to scout innovative solutions in cloud and artificial intelligence, smart tourism and the smart city;
- **30 memberships** of major national technical standardization bodies and associations and

international, both in the field of TLC and in sectors converging with ICT, including the automotive industry and Industry 4.0;

With **TIM Ventures**, we made direct and indirect investments for **11.3 million** in startups and SMEs.

# TIM PEOPLE

- Value of our people .....50
- Our training and reskilling programs ..... 51
- People Caring ..... 53
- Smart working ..... 54
- Inclusion ..... 55
- Gender GAP ..... 59
- Health and Safety protection ..... 60



# Value of our people

## *We are committed to enhancing skills and experiences in an evolving scenario*

The ongoing evolution of the technological and economic scenario presents ICT companies with the challenge of managing organizational changes and adapting professional skills.

Our company employs over 40,000 people in Italy, with an average age of 51. To protect the wealth of experience of senior workers, in 2022 we launched the **Longevity Program**, a comprehensive plan of interventions to enhance their contributions and overcome age-related stereotypes.

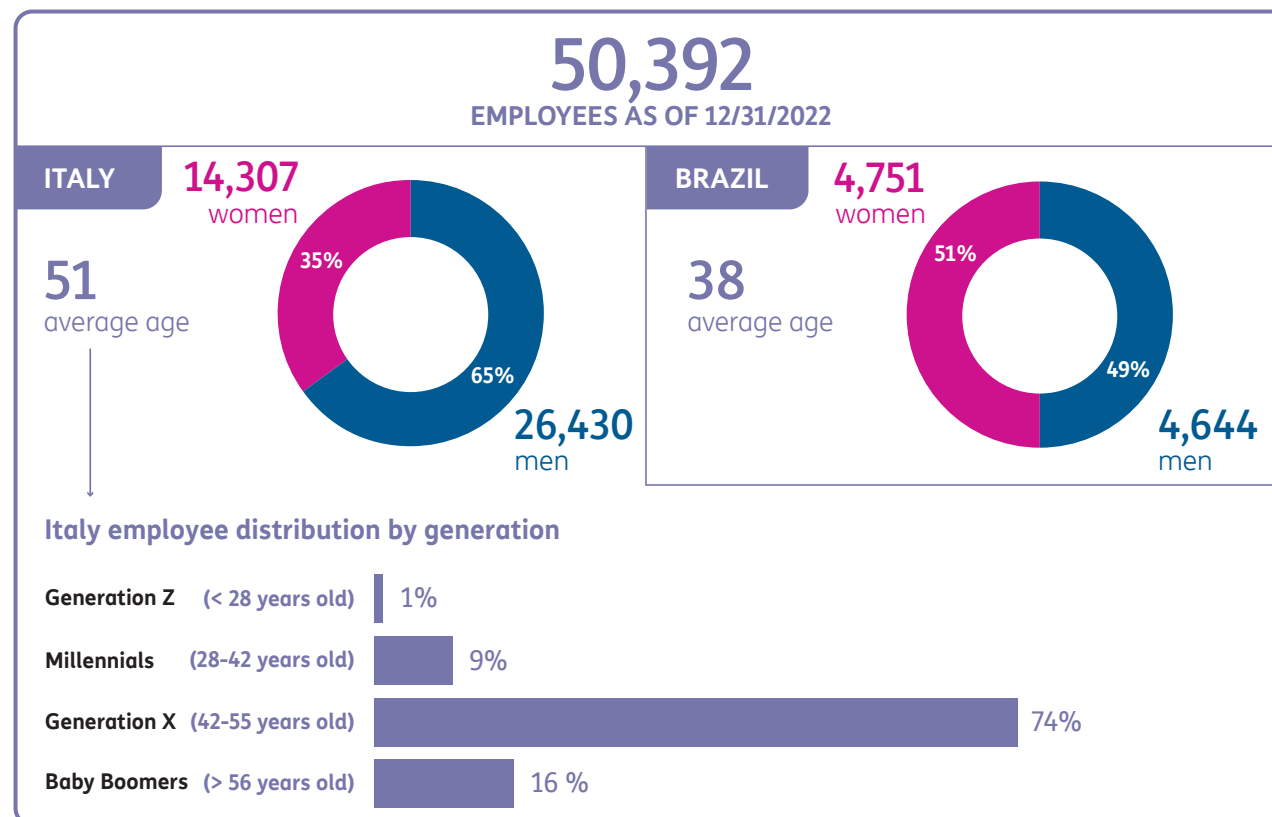
At the same time, to foster generational turnover, we signed an **Expansion Contract for the two-year period 22-24** which provides for:

- a **reduction in working hours** for around 30,000 workers, depending on their organizational area for three distinct percentages (10%, 15% and 25%) supplemented by a balancing payment and the provision of **training and retraining programs**;

- a **voluntary early retirement plan** for 2,200 workers;
- a targeted **recruitment campaign** focused on

key skills (1 new hiring planned for every 3 workers departing).

### TIM PEOPLE



# Our training and reskilling programs

## We grow the skills required in the ICT industry

We have set up a **continuous training plan** to improve the skills required by the ICT market which, during 2022, involved all employees in Italy in courses divided into four clusters:

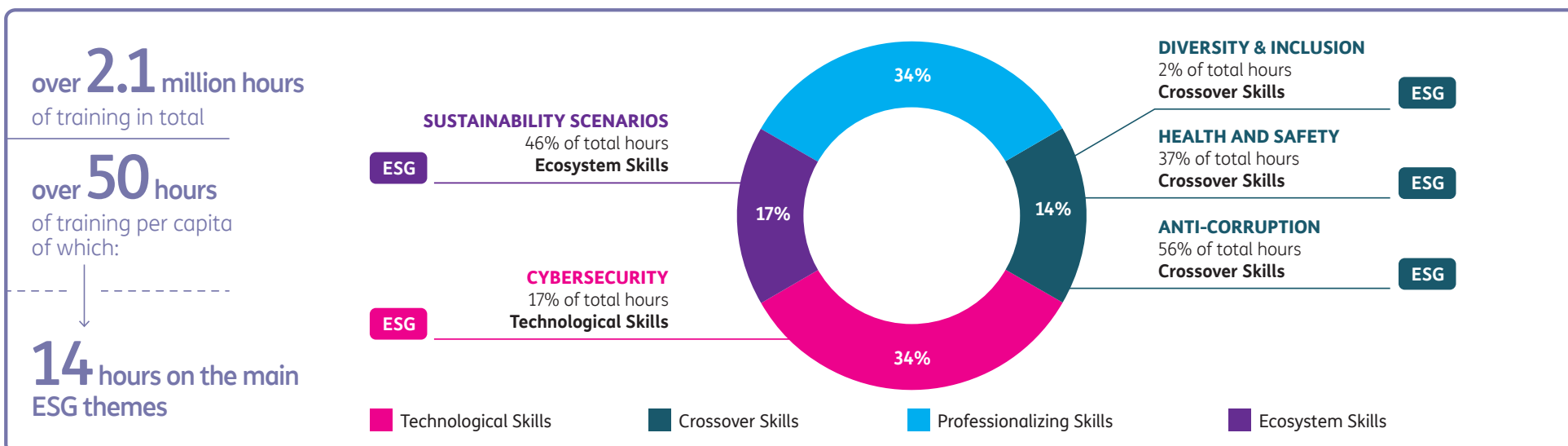
- **technological skills:** courses on core business technologies, such as 5G, Cloud and Cybersecurity;
- **crossover skills:** course to improve knowledge of company processes, including those relating to anti-corruption and health and safety;
- **professionalizing skills:** course on business with a focus on the digital transformation;
- **ecosystem skills:** courses on the telecommunications and ICT industry, business

scenarios and top trends such as that related to sustainability scenarios.

Also in Brazil, training activities have involved all employees, totaling about 0.6 million hours (62 hours per capita), with an increase of 24% over 2021 and with priority focus on the development of skills associated with technological and market and on strengthening ESG culture.

### HOURS OF TRAINING PROVIDED BY SKILL TYPE IN 2022

#### ITALY



In addition to internal training, we are actively committed to reducing the gap between the skills required and those existing in the labor market. For this reason, we are contributing to the work of educational establishments with the experiences and teachings of our professionals on digital innovation topics, promoting the development of digital professions with training programs created with our technology partners, and working with highly specialized skills development centers to create innovative projects.

### ITS MARIA GAETANA AGNESI

We are among the founding members in Rome of the Higher Technical Institute "Maria Gaetana Agnesi - Tech & Innovation Academy", a postgraduate **high-tech school of excellence** that trains Data Analysts and Digital Transformation Specialists.

37

founding  
members and  
participants

2

courses

50

students

1,800

annual  
training  
hours

### GOOGLE CLOUD PRO

In collaboration with Google Cloud we have developed a **free training program** to enhance digital skills and guide **Italian developers** (freelancers and IT business teams) to the Google Cloud Platform (GCP) certification.

7,000

developers  
trained

3,000

skill  
badges

### HOUSE OF EMERGING TECHNOLOGIES

As a partner and associate of some of the National Industry 4.0 Competence Centers, we have supported **6 winning proposals** of the MIMI "Houses of Emerging Technologies" call for tenders on topics covering **Blockchain** and **Crypto Asset, Internet of Things (IoT), Artificial Intelligence, 6G, quantum technologies**.

The interventions are aimed at municipalities where there is an ultra-broadband network using 5G mobile technology.

The municipalities benefiting from the proposals are Bologna, Naples, Taranto, Genoa, Pesaro and Cagliari.

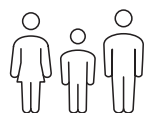


# People Caring

*We create the conditions to increase the well-being of our people*

In 2022, we repeated all the main initiatives for the well-being of people and families that we had already implemented in the past.

## 2022 WELFARE INITIATIVES ITALY



### FOR FAMILY

#### TIM Studio

**140 children** (sons and grandsons of our employees) have benefited from study assistance to improve school readiness. The project was carried out in cooperation with ALATEL, the Association of retirees and workers of the Group.

#### Mio Rimborso

We reimburse expenses incurred for daycare, preschool or **baby-sitting** services in order to support parenting and the work-life balance of colleagues.

**Around 1,200 applications granted.**

#### 17 Foreign study bursaries

For the most deserving children of our employees.

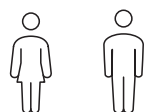
#### Subsidies

We have disbursed **20 financial assistance packages** to employees who found themselves in particularly difficult financial situations.

#### TIM Summer

For more than 50 years, we have been offering our employees' minor children a summer stay of **fifteen days**. An important change was introduced in the TIM Summer 2022 catalog: each stay was inclusivity-oriented, with targeted educational and training initiatives.

**3,000 children and young people involved.**



### FOR PEOPLE

#### Prevention

A catalog of materials offering insights into the prevention of certain diseases and proper lifestyles.

#### TIM myHealth

A free Healthcare Policy for all our employees that provides comprehensive healthcare for the whole family, offers a telemedicine service, ensures the support of a doctor who is always available online, issues prescriptions and delivers medications to the home.

**Enabled for all of the Group's people.  
Used in 2022 by more than 500 people.**

#### Movement and physical activity

Since 2019, we provide our employees with a partnership with Gympass at subsidized costs which gives them access to over **2,200 sports centers**, helping to reduce sedentariness, the fourth leading mortality risk factor worldwide.

**12,000 enrolled in free programs.  
Over 2,000 subscriptions activated.**

#### Stress reduction: Paths of Resilience

Personal support desk with a package of 8 free online meetings and up to 20 optional meetings at a subsidized rate. 4 webinars to raise energy levels, manage emotions, plan for the future and 2 e-learning paths for the well-being of mind and spirit.

**125 psychological support programs completed.  
300 training course users.**

# Smart working

*We implement a work model that integrates productivity, well-being and sustainability*

In Italy, we tested Smart Working with 9,000 employees for the first time in 2016, a year before the law that governs its operation came into force.

By 2018 there were already 13,000 workers and by 2019 they had increased to 21,000. During the pandemic emergency, over 30,000 employees were able to work remotely.

## SMART WORKING IN 2022

### ITALY

approximately  
**25,000**  
employees involved

**60** Smart working days per capita related to the pandemic context  
+  
**78** days per capita of Smart working thanks to our organizational model

**235**  
hours per capita of home-office travel avoided

In 2022, the model was **flexibly applied** to meet the needs of the context (e.g., closing offices from January to March and in August 2022 and varying number of Smart working days in other months).

The **choice to sign-up** is **voluntary** to protect specific personal situations. In 2022, the sign-up rate was **96% of those eligible**.

The model guarantees the **right to disconnection** and provides for **flexible hours from 8 a.m. to 8 p.m.** with two hours of co-presence in the morning and two in the afternoon.

The reorganization of office workspaces follows the **desk sharing** by reservation model and includes "relaxation" areas and shared meeting rooms.

**50,100**  
tCO<sub>2</sub>eq  
total emissions avoided<sup>(1)</sup>

corresponding to



**7,000**  
Trips around the earth

or



**Over 97,600**  
Trees that absorb CO<sub>2</sub> for 30 years of life

(1) For the calculation were used the following data: number of employees (TeleContact Center is out of calculation), number of days the offices were open, number of Smart working days, utility data (electricity, methane gas, diesel, water, cleaning services), and the home-to-work mobility of employees (results of an internal survey). The calculation was carried out by Rete Clima, a non-profit entity specializing in promoting sustainability in companies, through the use of emission factors from the Ecoinvent 3.9 database.

# Inclusion

## *We value people over differences*

For many years we have paid particular attention to the topics of inclusion and the enhancement of diversity, in the knowledge that **these aspects not only represent ethical values, but are also a formidable driver** for enhancing the company's **performance**, as they are closely related to **engagement** and people's **satisfaction**.

### THE PILLARS OF INCLUSION

- Culture of Inclusion
- “Progetto Donna” [Woman Project]
- Disability
- Sexual orientation and gender identity
- Ethnicity and Religion

## Culture of inclusion

Every year, we promote numerous events intended to disseminate inclusion issues, with the active contribution of employees. The most successful initiative is 4Week4Inclusion, an inter-company marathon organized by TIM for the third consecutive year.

### FOCUS ITALY

4WEEK4INCLUSION  
16 NOVEMBER - 6 DECEMBER  
2022



Hundreds of guests and speakers took turns for four consecutive weeks **telling stories of inclusion, best practices, models and tools for valuing all diversity**: from disability to intergenerational comparison, valuing women's contributions, sexual orientation and gender identity, ethnicity and religion.

**The central theme of this edition was the Gender Gap**, with daily events and an entire day dedicated to it (November 25 - International Day for the Elimination of Violence against Women).

**+300**  
companies  
partner

**20**  
days  
for 190  
events

**3Mln**  
views  
of content  
produced

## “Progetto Donna” [Woman Project]

We implement actions to effectively guarantee the equality of women in terms of equal opportunities and professional growth. Gender difference is in fact a resource on which to build a more solid world of work and a fairer society. Progetto Donna aims to overcome the gender gap by tackling cultural aspects such as reducing gender bias, promoting shared family and parenting roles, and empowerment.

### CLIMATE AND CULTURE

#### Gender and sexual harassment and bullying

We have an ad hoc policy and legal, psychological and Person of Trust counseling services to support it. Since 2022 we have introduced a training course (on demand) on harassment and bullying.

#### Gender bias

We engaged the entire corporate population in the Harvard Implicit Test, in partnership with Harvard University, to measure unconscious biases related to gender.

#### Shared parenting

Since 2021, we have introduced the new additional parental leave, which doubles the number of days available for mandatory paternity leave. A Psychological Desk is also available to support parenting, which is free of charge to support new parents in moments of difficulty.

### CAREER DEVELOPMENT

#### Female LeadHERship

We highlight the value of female leadership with cycles of role modeling meetings to combat gender bias and prejudice.

#### Partnership with Young Women Network

224 female colleagues under 35 years old involved in networking, mentoring and empowerment meetings to support their personal growth journey and fostering the creation of a network to exchange ideas, experiences and design common paths.

#### Coaching and mentoring programs:

- 393 Individual Coaching programs and 1 group Coaching started
- 58 Mentoring Programs for female colleagues under 37 years old

## FOCUS ITALY



Since 2010, we have been a supporting partner of **Valore D**, the first **business association in Italy** - there are currently more than 330 - which since 2009 has been a pioneer in addressing the gender balance issue and the spread of a culture of inclusion to support innovation, progress and the growth of organizations and of our country.

**Valore D** supports member companies by providing know-how and effective tools for the Diversity, Equity and Inclusion strategy. **Valore D** also offers the opportunity for intercompany comparison through the exchange of best practices and ongoing dialogue among members, and is a point of contact for institutions.

## FOCUS BRAZIL



Since July 2021, we have partnered with **Mulheres Positivas**, an ambitious project that, through a **digital platform**, promotes the **employability and empowerment of Brazilian women**.

We led the development of the initiative, which in 2022 grew into an intercompany program.

135

participating  
companies

200

courses

80,000

job  
opportunities



## Disability

Over **1,500 of our male and female colleagues** at TIM, equal to around 3% of the workforce, **have a disability**. To allow them to live their working day comfortably, we have made available:

- solutions to improve communication between deaf and hearing employees;
- the **“Sordi Inclusi”** [Deaf Included] program, which provides additional technological equipment to allow deaf colleagues to communicate with the rest of the company;
- the dyslexia awareness and training programs;
- the **“Nessuno Escluso”** [None Excluded] project aimed at providing specific IT equipment for everyone with a disability.

## Sexual orientation and gender identity

We are among the first Italian companies to provide **specific inclusion programs for LGBT people**. Based on our **extended view of the family**, we offer cohabiting partners all the benefits provided for family units, regardless of gender or blood ties. We therefore give homosexual families and their children the opportunity to access company caring services. For colleagues undergoing gender transition, we recognize self-perceived identity before the sentence is passed and prepare the working environment for the colleague's transition.



We are among the founding members of **“Parks - Liberi e uguali” [Parks - Free and Equal]**, a non-profit association that promotes Diversity Management as a source of value and a competitive advantage. Parks supports member companies in building a culture of inclusion through training, organizational consulting, research, event organization and networking activities.

## Ethnicity and religion

Although in Italy less than 1% of people in the Company belong to an ethnicity and/or religion other than the one prevailing in the country, we keep this aspect in mind in our actions. In 2022, a policy was published that gives people of religions other than Catholicism the opportunity to celebrate the holidays stipulated by their beliefs with ad hoc permits, and to be able to organize times of worship at corporate workplaces.

In Brazil, around 38% of TIM's workforce belong to ethnic minorities. In November 2022, we launched the **“Black People Development Program”** project to provide development paths for all of TIM's black professionals.

# Gender GAP

*We aim for fair treatment between genders as an element of equity and meritocracy*

Gender balance is the basis for building a meritocratic organization and is generally recognized as instrumental in achieving business results. The gender gap is represented by the difference between the percentage of women in the Company and the percentage of those women in **positions of responsibility**. In both Italy and Brazil, we fight

this gap with an Industrial Plan target that guides organizational transformations over time and with a short and long-term incentive plan.

In 2022, the **pay gap** targets set with the variable remuneration system were achieved: zeroed in management and reduction of the gap in middle management.

## GENDER GAP NUMBERS

	Italy		Brazil		Group	
	2021	2022	2021	2022	2021	2022
% Women	35%	35%	50%	51%	38%	38%
% Women in leadership position <sup>(1)</sup>	22%	24%	32%	34%	25%	28%
% Average Women on the Group's Boards	23%	45%	25%	25%	23%	43%

(1) Italian and Brazilian women managers.

# Health and Safety protection

*We apply the highest standards and pursue continuous improvement of our management model*

Our **Safety Management Model** complies with the main recognized standards (UNI ISO 45001) and applies to all processes connected with offices and mixed use buildings.

In addition to the specific policy, which encompasses the safety management principles and guidelines, we have set up a **Safety Steering Committee**, chaired by the Chief Executive Officer, with the aim of:

- ensuring that the Management System complies with the reference standards;
- promoting integration between the various company functions;
- reporting on the performance of the Management System and sharing improvement measures.

In 2022, in addition to the mandatory activities, we carried out information and awareness campaigns aimed at all employees.

## THE NEAR MISS PROJECT

**Near misses** (or "near accidents") are events that did not result in injury to the person only because of favorable conditions and/or chance.



Sample  
of more than 3,500  
on-field technicians  
and workers in the Real  
Estate sector

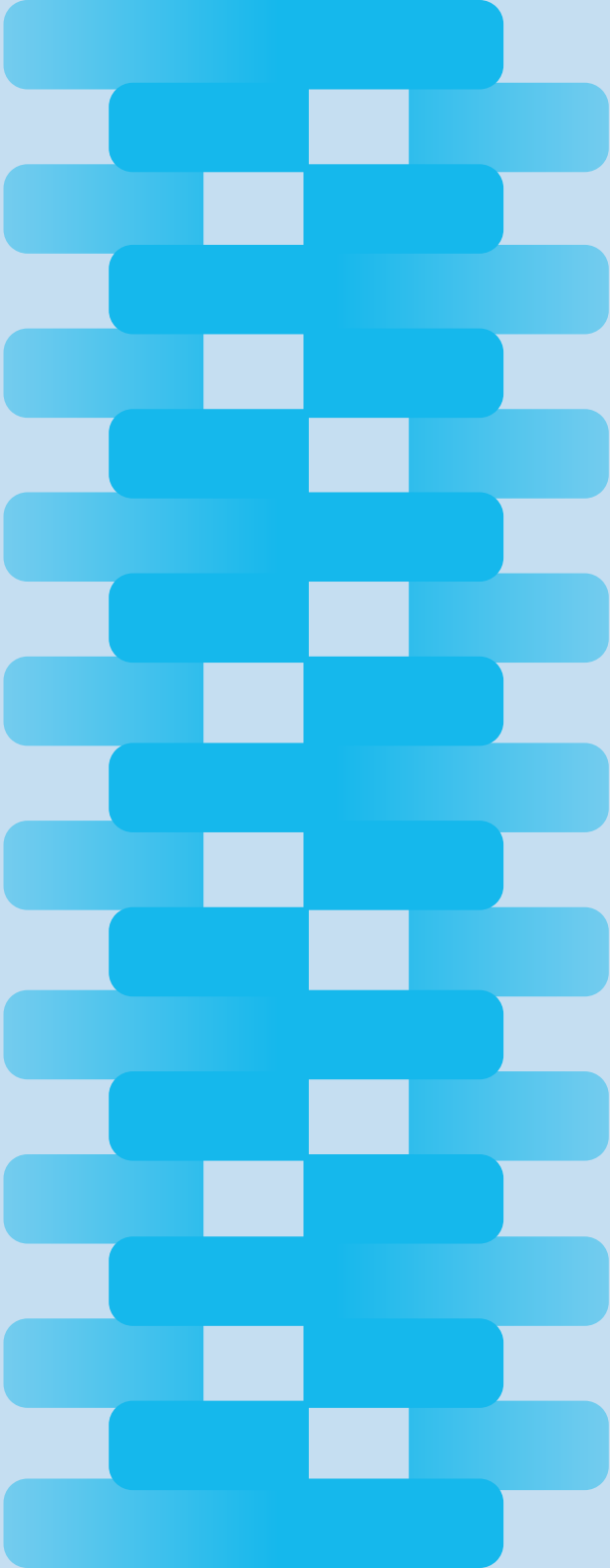


Near-miss  
reports

Thanks to the reports received, we have identified the highest risk areas on which to **intervene with increasingly efficient prevention activities**.

# ACTIVITIES IN THE SOCIAL FIELD

Collaboration with Institutions .....	62
Solidarity fundraising.....	63
Foundations .....	64



# Collaboration with Institutions

## *We cooperate with Institutions and associations*



We work together with the Italian Civil Protection Department and all national and local institutions, state administrations, the Armed Forces, private companies, research centers and local communities to protect human lives, settlements, animals, artistic heritage and the environment, both when disasters and emergencies strike and at major events such as concerts. To date, there are **14 emergency vehicles designed and engineered to build mobile exchanges** throughout the country.

We ensure prompt intervention by the Italian Coast Guard through our operational centers in Rome and Palermo, where over 130 people work, which ensure continuity of the maritime and satellite radio network services and therefore thus assisting the navigation.

### FOCUS ITALY

## NATIONAL “VULCANO 2022” EXERCISE

In April 2022, we participated in a real test evacuation of the population of the island of Vulcano due to volcanic risk by testing for the first time the public warning system providing information to the population, “**It-alert**” commissioned by the Department of Civil Protection of the Presidency of the Council of Ministers and implemented by TIM together with other telecommunications operators.





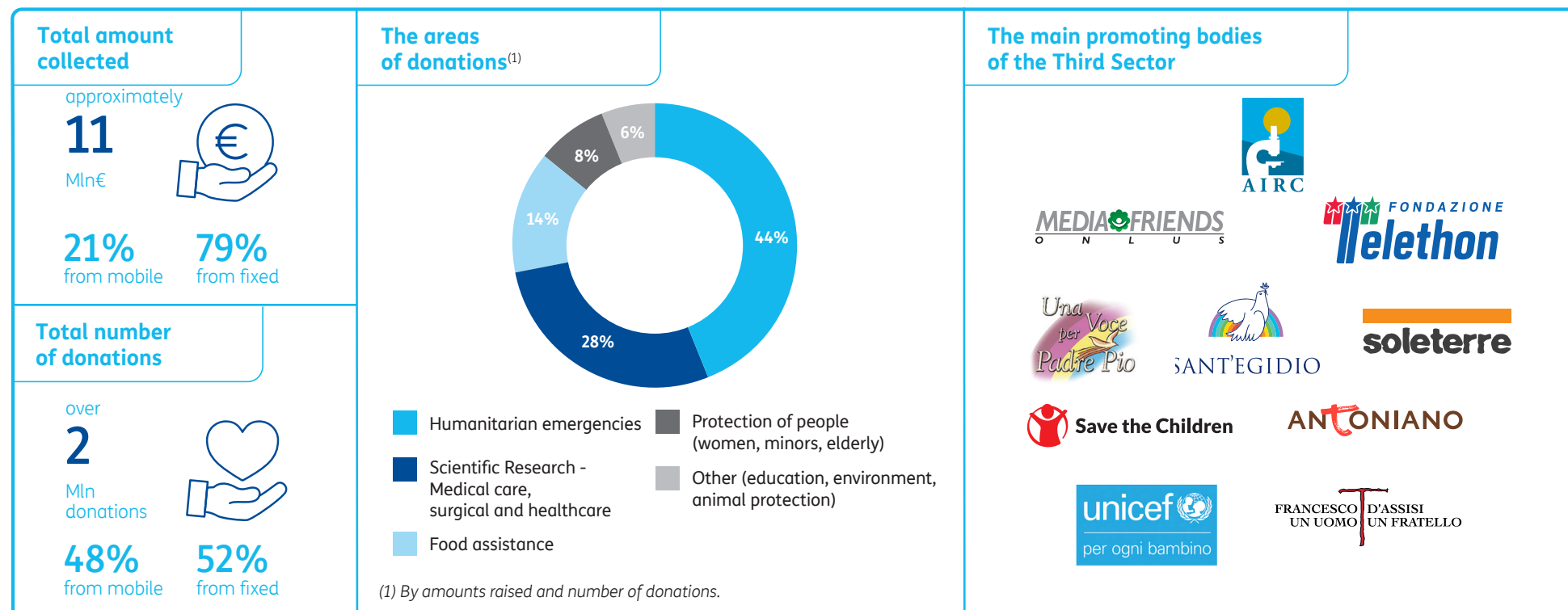
# Solidarity Fundraising

*We are an active part of the solidarity chain*

For over 20 years, through text messages and land line calls, **we have been raising solidarity funds** to support humanitarian, scientific, social and environmental protection projects of the Third Sector Entities, as well as those in favor of national and international emergencies sponsored by the Italian Civil Protection Department. We offer the possibility of making donations via SMS for the value of 2 euros and calls from a landline to a dedicated number for the amount of 5 or 10 euros, then paying entirely the donated amounts to the sponsoring bodies.

## DONATIONS FROM OUR CUSTOMERS IN 2022

ITALY



# Foundations

*We fund community projects*

## Fondazione TIM

Since 2009, we have promoted the economic and social growth of the country through Fondazione TIM. In 2022, the organization disbursed around 3 million euros in donations and public tenders.

### Donations

- **1,894,000 euros** to the **World Health Organization for the health of Ukrainian migrants and refugees**;
- **300,000 euros** to the university-hospital polyclinic **Azienda Ospedaliero-Universitaria Policlinico Umberto I** for implementation of the “2022 Oncology Project”;
- **80,000 euros for artistic and cultural initiatives**, for the protection and enhancement of the historical and artistic heritage, for the development of ways and forms of enjoyment and dissemination of knowledge of the heritage itself, and to support the world of culture, entertainment and music;
- **300,000 euros** to the “**Corinaldesi-Padovano**” **State Higher Education Institute** for restoration of the Senigallia Institute's laboratories and professional equipment, which were severely damaged by the flood that hit the Marche Region in September 2022.

### 2022 "Education and Scientific Research" calls for tenders

- “**Ti-riuso mascherina!**” **300,000 euros** allocated to the **call for tenders aimed at universities and research centers** to find innovative, technology-supported solutions to propose methods of recycling and processing protective masks of all kinds;
- “**Studiamoci su**”: **two grants worth 50,000 euros each**, for research projects and proposals for therapeutic interventions on the psychosocial impacts that the pandemic has brought about in the youth population.

## Instituto TIM

In Brazil, TIM promotes the social inclusion of children and teenagers through education programs in Science, Technology and Innovation (STI).

Since 2013, over 700,000 people have been involved in all 26 Brazilian states and the Federal District. In 2022, the “Exponential Education” initiative was launched with One By One ONG to prepare young people for the labor market.

### Exponential education

July 2022

**36**  
certificates  
issued

**75%**  
young  
people

**25%**  
mothers  
or fathers

December 2022

**44**  
certificates  
issued

**80%**  
young  
people

**20%**  
mothers  
or fathers

## The Olivetti Historical Archives Association

Since 1998, with the Olivetti Historical Archives Association, we have collaborated with private and public entities to organize exhibitions, conferences, research, and publications.

In addition, we guard and manage a unique documentary heritage, enhanced in an innovative way using a digital approach that reaches new generations and an international target audience.



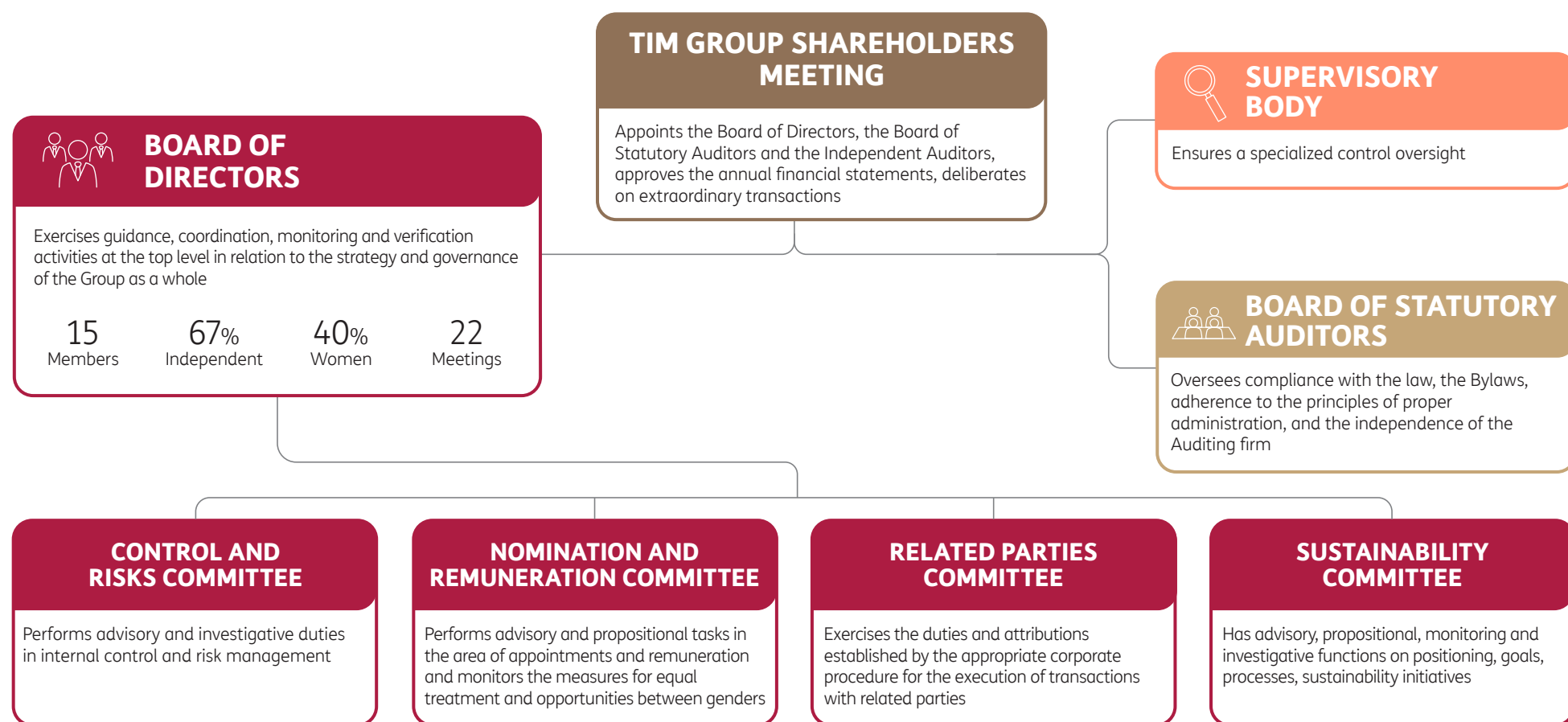
In 2022, we created the “Olivetti e la cultura nell’impresa responsabile” exhibition, a series of 6 exhibits at the P.A. Garda Museum in Ivrea. The Olivetti Historical Archives Association was among the sponsors of the UNESCO recognition of Ivrea Industrial City of the 20th Century (2018) and Ivrea Italian Book Capital (2022).

# GOVERNANCE

Corporate Governance Structure.....	67
Internal control system.....	69
ESG Governance Tools.....	71
Business Integrity.....	79

# Corporate Governance Structure

*Our corporate governance system to minimize business risks and costs*





The Board of Directors in its activities is supported by four **Internal Committees with advisory, proposal-making, 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 rules of procedure which describe the composition of its members, how they are appointed and how they operate.

The Sustainability Committee, established in 2021, oversees the Group's ESG positioning, targets, processes and initiatives, interacting with:

- the Nomination and Remuneration Committee, in order to include ESG targets in the Remuneration Policy and to adopt measures for equal treatment and opportunities between genders;
- the Control and Risk Committee for the preliminary procedures for the non-financial statement and for the analysis of corporate ESG risks.

Moreover, in Italy, the **Sustainability Department**, in collaboration with other Company Departments, defines the ESG targets for the Industrial Plan, identifies sustainability initiatives to support the Plan, drafts the Non-Financial Reporting and monitors the sustainability ratings in coordination with the CFO.

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

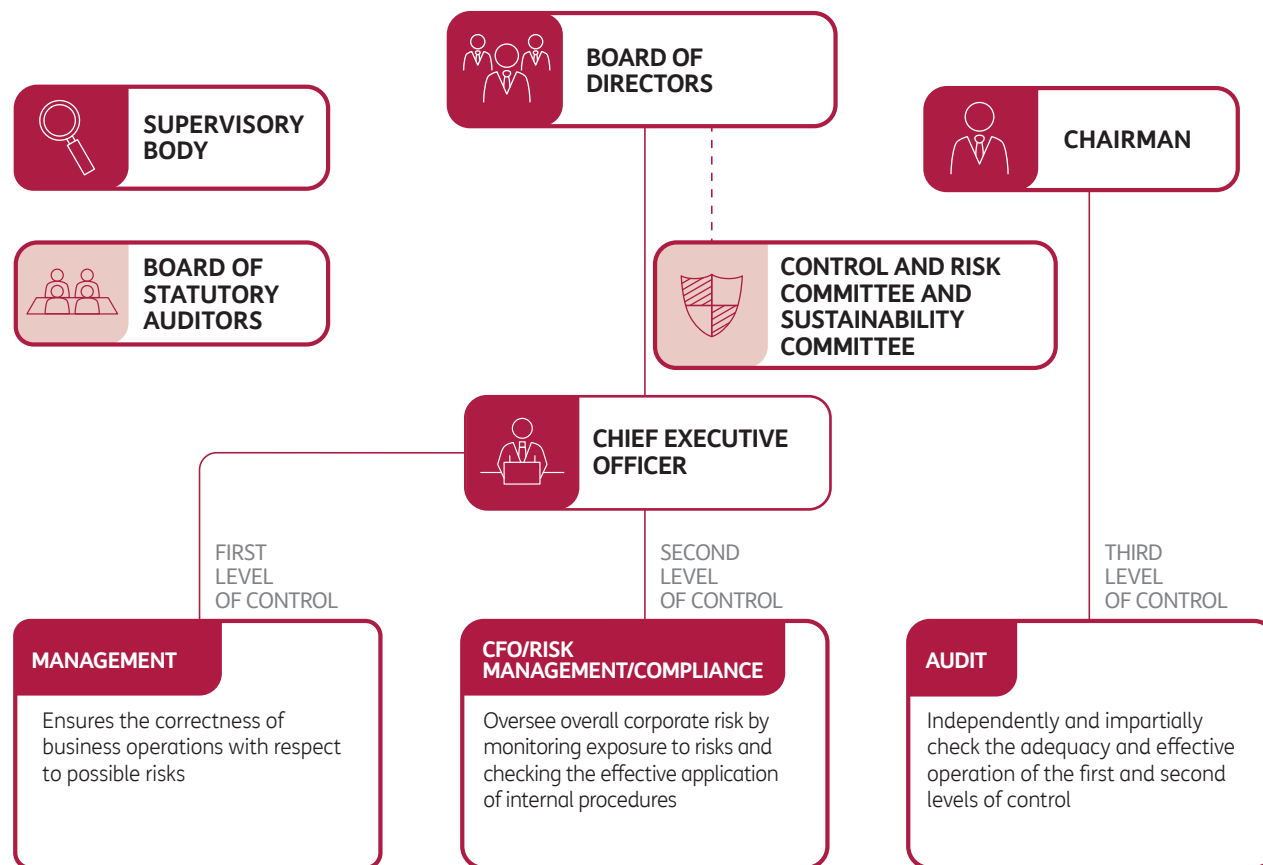
Sustainability issues are managed by a Sustainability Department, and at the strategic level by the ESG Committee, which interacts with the Remuneration Committee and the Control and Risk Committee.



# Internal control system

*We monitor compliance of the rules for the proper management of the business*

The internal control system is structured into three levels, and is applied in the various Group companies taking account of their specific individual operational characteristics.



The system is completed by:

- **“Whistleblowing Procedure”**, for the reporting of alleged wrongdoing by our employees, also anonymously. The procedure covers TIM and its Italian subsidiaries. For TIM Brasil a customized procedure has been set up;
- The **“Anti-corruption Management System”** (AMS), which supports us in preventing, recognizing and responding to actions of corruption, in compliance with the reference laws and the commitments voluntarily assumed. The AMS, which obtained UNI ISO 37001 “Anti-

Bribery Management Systems” certification, applies to the members of our corporate bodies, employees and various types of workers, and includes the following instruments:

- the **Code of Ethics and Conduct**, which indicates the targets and values underlying our organizational model and internal control system;
- the **“Organizational Model 231”** which prevents the commission of crimes and administrative offenses that could be committed in our businesses;
- the **Anti-corruption Policy**, which provides a systematic reference framework for managing and preventing corruption;
- the document **“Anti-corruption Management System of TIM S.p.A.”** which applies to TIM. TIM Brasil and the national subsidiaries with ISO 37001 certification have their own reference document;
- TIM’s **Procedural system**, which defines roles and responsibilities in the processes of interest, in compliance with the principles of transparency, accountability and separation of roles.



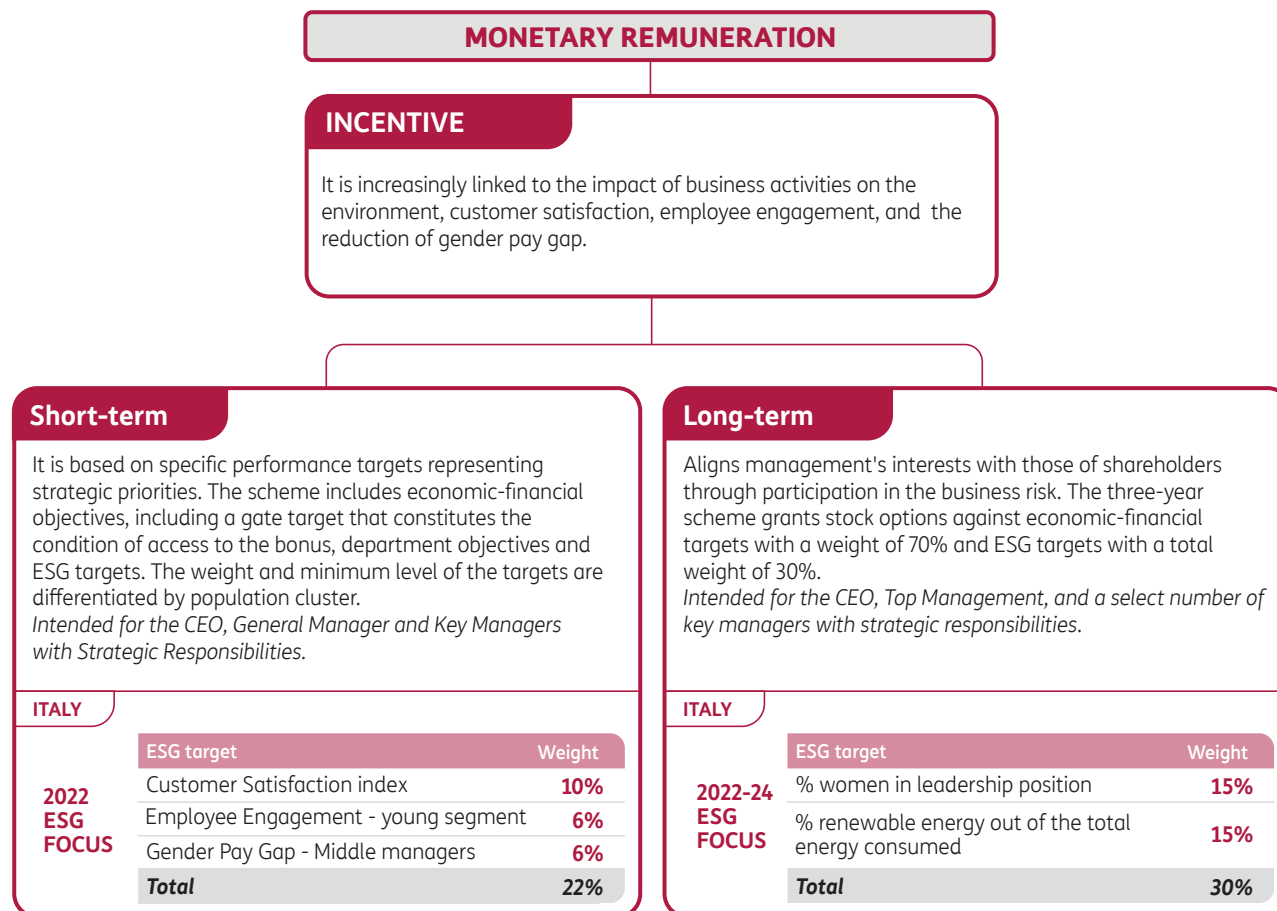
# ESG Governance Tools

*We implement processes, policies, certifications to manage our business according to sustainability criteria*

## The ESG incentive system

The variable remuneration policy is another important lever for achieving ESG targets within the set timeframes<sup>(1)</sup>.

(1) Further information on remuneration can be found in the “Report on Remuneration Policy and Compensation Paid” on the website [www.gruppotim.it](http://www.gruppotim.it) and the “Management Compensation Policy” at [www.tim.com.br](http://www.tim.com.br)





## Stakeholder Engagement

We engage with our stakeholders on the most relevant issues to our business through the consultation, dialogue, information and collaboration activities we organize throughout the year, to better target our operational and strategic

activities. A recurring event is the materiality analysis, conducted in preparation for drawing up the non-financial reporting, which, with a specific survey, allows us to discuss the most relevant materiality topics in terms of impact.

We update the list of stakeholders every year following the AA1000SES global standard, the most widely applied in this field. We identify our stakeholders starting with a list generated by an application that leverages semantic analysis and big data, which is then consolidated and weighed in terms of materiality by the company management.

In 2022, we identified **eight categories of stakeholders** with whom we have constant dialogue and confrontation.



## MAIN CHANNELS AND ACTIVITIES FOR STAKEHOLDER ENGAGEMENT

**TIM PEOPLE***Includes trade union organizations*

- Over **16 million views** on the intranet portal.
- **190 news stories** created that generated more than **3,700 comments**
- 78.7% of Group employees received **direct feedback** on performance
- **Monthly trade union meetings**

**INDUSTRY BUSINESS COMMUNITY***Includes peers, over the top, industry associations*

- **Intra-operator working tables** in the Trade Associations Working Groups (ASSTEL and Anitec-Assinform) and in the Confindustria Digitale Federation
- **Participation at over 400 conferences/events** in Italy

**SUPPLIERS AND BUSINESS PARTNERS**

- **250** suppliers participating to the first Open-es meeting
- **98 JAC Audits** including 5 by TIM
- **2,700** suppliers logged into the Vendor Hub portal at least once

**FINANCIAL COMMUNITY***Includes shareholders and banks*

- **Quarterly** financial reports
- **Quarterly** presentations/webinars
- Participation in the compilation of questionnaires and surveys of **over 20 ESG rating agencies**
- **Individual calls** with leading industry analysts

**CIVIL SOCIETY***Includes consumer associations*

- Active participation in the **Consumers' Forum**
- Periodic meetings with the 6 **Consumer Associations** participating in the Memorandum of Understanding
- Participation as a partner in the work of the **National Industry 4.0 Competence Centers**
- Survey

**BODIES AND INSTITUTIONS***Includes public administrations, national and international institutions*

- Participation in working tables with the Ministry of Industry and Made in Italy on industrial policies, labor and simplification
- Participation in European Commission Meetings/Working Tables

**CUSTOMERS**

- Listening plan with **more than 5 million interviews**
- **4.2 million instant messaging conversations**
- **390 thousand conversations** on WhatsApp (human and bot)
- **276 thousand caring conversations** on Facebook and Twitter
- **221 thousand reports** in the MyTIM private area of the TIM.it website

**MEDIA***Includes opinion makers*

- **485 Press Releases** (300 Italy; 185 TIM Brasil)



## Materiality analysis

The process is the basis of the Non-Financial Reporting and constitutes input for strategic planning and the management of company risk.

In 2022, following the International Standards of the Global Reporting Initiative, we have adopted the

criterion of the relevance of impact according to a “single materiality” approach, i.e. assessing the actual or potential impact that TIM can generate for each topic on society and on the surrounding environment (inside-out approach).

The analysis involved both TIM’s stakeholders and top management, who were asked to assess the relevance for TIM of the material topics based on their impacts.

Specifically, at TIM, **the materiality analysis involves six steps:**

### STEPS OF MATERIALITY ANALYSIS IN TIM



In 2022, **16 material topics** were identified. Below is the list of material topics sorted by impact relevance with evidence of the type and intensity of the impact.

Compared to 2021, we did not detect any substantial changes, but we have qualified the topics in more detail according to the relevance of their impact on the outside world, increasing from 12 in 2021 to the current 16.

**New material topics are overseen by the Plan targets and ESG projects.** Those with medium-high impact are overseen in terms of risk by our risk control system (ERM)<sup>(1)</sup>.

### LIST OF MATERIAL TOPICS 2022

Material topics		Impact level	Type of impact	
1	Privacy and cybersecurity		POTENTIAL	NEGATIVE
2	Digital inclusion		ACTUAL	POSITIVE
3	Infrastructures and emerging technologies		ACTUAL	POSITIVE
4	Customer interaction and service transparency		ACTUAL	POSITIVE
5	Employee health and safety		ACTUAL	NEGATIVE
6	Development and motivation of TIM employees		ACTUAL	POSITIVE
7	Climate change		ACTUAL	NEGATIVE
8	Energy transition		POTENTIAL	POSITIVE
9	Legal and regulatory context management		POTENTIAL	NEGATIVE
10	Equal pay and opportunity		POTENTIAL	NEGATIVE
11	Community and stakeholder relations		ACTUAL	POSITIVE
12	Resilience to physical, public health and sociopolitical risks		ACTUAL	POSITIVE
13	Sustainable supply chain		ACTUAL	POSITIVE
14	Human rights defense		POTENTIAL	NEGATIVE
15	Cyberbullying, child pornography, online gambling		POTENTIAL	NEGATIVE
16	Circular economy and waste production		POTENTIAL	NEGATIVE

environment
 social
 governance
 low
 medium
 high

(1) See the section on the risk management system.

## The system of listening to our customers

We oversee quality and customer experience through an extensive listening system that allows us to detect the customer journey at different touch points and to define specific improvement plans to give value to our customers' feedback. Of particular importance among the surveys of the Italian market is the monitoring of the **"Customer Satisfaction Index"** based on the American Customer Satisfaction Index (ACSI) standard, which aims to survey the quality perceived by TIM customers and the customers of main competitors.

In 2022, the value of the **CSI** for the **Consumer customer base** of the **Italy perimeter** was **75.01** (vs 74.29 in 2021<sup>(1)</sup>) compared to a target value of 75.63 confirming a stable performance. Also in the Small and Medium Business segment, CSI improvement targets were set and fully achieved. With reference to the customer satisfaction indicators monitored by TIM Brasil, an improvement in the average Consumer Customer Satisfaction Index was recorded in 2022 with +7.5% vs 2021. The remaining satisfaction indicators were essentially unchanged.

(1) Updated data based on revenues for the reporting year.



MORE THAN **5 MLN**  
**FEEDBACK**  
COLLECTED IN 2022  
IN ITALY AND BRAZIL

## Certifications demonstrating our commitment to value creation

The certifications we have obtained objectively demonstrate the creation, application and maintenance of a management and organizational system that follows national and international reference standards, providing assurance to our stakeholders while ensuring compliance with standards increasingly demanded in the tenders we participate.

In 2022 we count **9 major certifications with a specific focus on ESG issues**.

		TIM S.P.A. DEPARTMENTS	NOOVLE	OLIVETTI	TELSY	TELECOM ITALIA TRUST TECHNOLOGIES	TIM DIGITAL SERVICES	SPARKLE	TIM BRASIL
E	<b>ISO 14001:</b> sets the requirements of the Company's <b>environmental management system</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>ISO 14064:</b> certifies the <b>quality of the reporting process</b> and monitoring of <b>greenhouse gas emissions</b> of the Company	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>ISO 50001:</b> certifies the development of an <b>efficient energy management</b> system	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
S	<b>ISO 45001:</b> standard for the <b>occupational health and safety</b> management system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<b>ISO 30415:</b> certifies the presence and quality of <b>inclusive and sustainable corporate programs</b> in the workplace	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
G	<b>ISO 22301:</b> certifies the presence of a management system for <b>business continuity</b> under adverse conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>ISO 9001:</b> specifies the requirements for a <b>quality management</b> system certifying the quality level of the Company's products and services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>ISO/IEC 27001:</b> reference standard for the management of <b>information security</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>ISO 37001:</b> certifies the presence of a <b>management system for preventing bribery</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Policies to address operations

To direct the correct operation of the business, we establish and constantly update the internal and external policies and organizational procedures that clearly define the rules and norms we intend to refer to. All policies are available on the internal and external channels of the Group companies. Among them we point out the **14 most relevant ESG policies**.

### MAIN ESG POLICIES

E	Environmental Policy	Group
	Climate Change Policy	Brazil
S	Human Rights Policy	
	Health and Safety Policy	Group
	Human Resources Policy	
	Gender Harassment Policy	Italy
	Social Responsibility	Brazil
G	Diversity and Inclusion Policy	
	Information Security and Cybersecurity Governance Policy	
	Whistleblowing Procedure	
	Tax Strategy Policy	Group
	Purchasing Policy for Products and Services	
	Crisis management policy	
	Anti-corruption Policy	

# Business Integrity

*We promote a culture of fairness and transparency*

## Risk management system

Our Group adopts an **Enterprise Risk Management** model (hereinafter **ERM**) that follows the international reference regulations and standards and integrates with the strategic and operative planning processes. The ERM model is designed to identify the potential events that may affect the business, identify and manage the connected risks within acceptable limits and provide awareness to Top Management.

We conduct a periodic review of the risk scenarios, not only when defining the Industrial Plan, but also upon the occurrence of significant changes in the internal and external context or new risk scenarios.

### TIM'S ENTERPRISE RISK MANAGEMENT MODEL










ERM has identified and mapped the risks of our Group into **12** continuously evolving **clusters**<sup>(1)</sup>.

The risks included in the ESG area are an integral part of the clusters identified.

#### TIM RISK MAP

	Climate		Energy		Legal & Regulatory
	Commercial Credit		Financial		Market
	Compliance		Fraud		Supply Chain
	Cyber		Health & Safety		Technology

(1) For ERM, risk is defined as a possible event that can jeopardize the achievement of the Industrial Plan targets or the proper functioning of business processes and that, if identified and assessed well in advance, can generate value. The level of low, medium, and high ERM risk is based on the impact on Industrial Plan targets and processes as well as the probability of the event occurring ( $Risk = Impact \times Probability$ ). The impact on Plan targets is assessed for current risk as Equity Free Cash Flow at risk.

ESG risks are assessed annually in the materiality analysis, which selects and assesses the impacts and risks connected with material topics.

Also for 2022, the analysis shows that **risks linked to the most relevant material topics in terms of impact are mapped and overseen by the ERM**

**model** through specific mitigation activities defined by the Risk Owners with the support of the Risk Management Department.

### ERM MONITORING OF MATERIAL TOPICS

Material topics	ERM risk level <sup>(1)</sup>	ERM Risk Area	ERM activities
1 Privacy and cybersecurity	low	Privacy / Cyber	
2 Digital inclusion	low	Technological	
3 Infrastructures and emerging technologies	low	Technological	
4 Customer interaction and service transparency	low	Market	
5 Employee health and safety	low	Health and Safety	
6 Development and motivation of TIM employees			
7 Climate change	low	Climate	
8 Energy transition	low	Climate	
9 Legal and regulatory context management	low	Regulatory / Privacy	
10 Equal pay and opportunity			
11 Community and stakeholder relations			
12 Resilience to physical, public health and sociopolitical risks	low	Climate / Regulatory <sup>(2)</sup>	
13 Sustainable supply chain	low	Supply Chain	
14 Human rights defense			
15 Cyberbullying, child pornography, online gambling			
16 Circular economy and waste production			

■ environment 
 ■ social 
 ■ governance

■ low 
 ■ ■ medium 
 ■ ■ ■ high

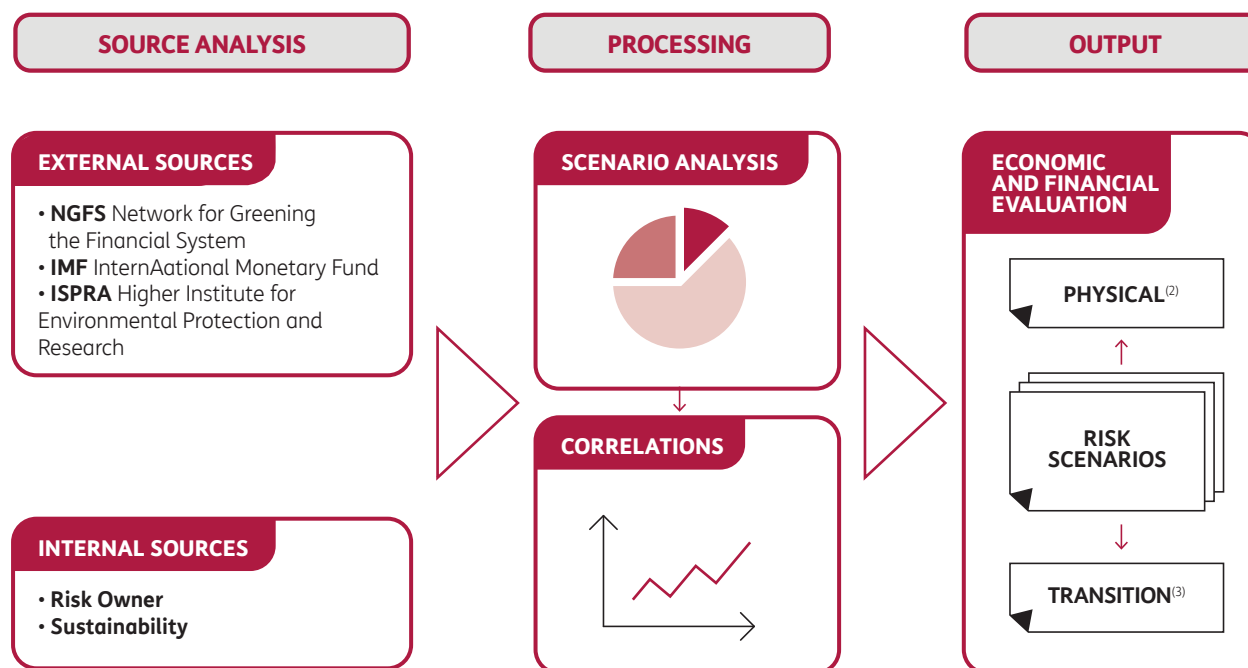
(1) Inherent ERM risk level assessed gross of mitigation actions already implemented in the Company.

(2) For the "Regulatory" risk area, ERM activity is being analyzed.

Among the mapped company risks, **“Climate” risk is managed in line with the model proposed by the Task Force on Climate-related Financial Disclosures<sup>(1)</sup>**, which recommends disclosure by the company of the metrics and targets used to assess and monitor risks and opportunities linked to the climate, including Scope 1, 2 and, where possible, Scope 3 emissions.

To measure the actual and potential impact of this risk, we use a short, medium and long-term assessment model that provides an economic-financial risk output.

### APPLICATION OF ERM METHODOLOGY TO "CLIMATE" RISK



(1) The Task Force on Climate-related Financial Disclosures (TCFD) is created by the Financial Stability Board (FSB), the international body that monitors and makes recommendations on the global financial system to improve and increase climate-related financial disclosure.

(2) Derive from climate change impacts.

(3) Derive from actions associated with a transition towards a low-carbon economy, e.g., the introduction of new low-carbon climate or technology policies.

## The protection of privacy and the protection of personal data

In 2022, we adapted the Group's Organizational Model overseeing personal data protection to the principle of **privacy-by-design**, which requires the data controller to implement effective technical and organizational measures to protect personal data, such as the introduction of new IT tools, including the one for managing Information Notices and the one for managing the Registers, which enable the integration of managed information.

In the cybersecurity area, we constantly upgrade the protection measures for the public telecommunications network and our network and data center infrastructures, in addition to having a robust IT security incident management process reinforced by operational policies and procedures on crisis management.

## Minors protection

The curiosity and lack of experience of young people using chat services, email, instant messaging and more generally the Internet can make web surfing unsafe.

Our goal is to protect minors from these virtual places first and foremost through **offers dedicated to younger people (TIM Junior)** that protect them when surfing from smartphones or PCs, which have features such as parental control, antivirus and anti-malware, protection and privacy.

## Human rights

Our commitment to Human Rights goes beyond "basic" rights and considers the specificity of our business activities, recognizing the right to access

information, freedom of expression, protection of online privacy and security, the protection of minors from the risks associated with the use of new technologies.

From this perspective, we have adopted a Policy, reported in our Code of Ethics and in all the **most relevant policies**, which encompasses TIM's entire value chain, including our people, suppliers, business partners and customers, with particular regard to vulnerable groups.

Regarding our people, in 2021 we introduced a Policy that establishes complete intolerance of gender and sexual harassment and bullying, also promoting activities of awareness and preventive training by introducing psychological legal support tools to possible victims.

### FOCUS

#### "DIGITAL MEDIA APPOINTMENT"

We have carried out a free training program **"Digital Media Appointment"** in collaboration with **IDMO** (Italian Digital Media Observatory), the European Union's Italian observatory for combating disinformation and disseminating good practices in the use of digital media.

The program designed for middle and high school teachers and students includes: video shorts, virtual and live classrooms, interactive games and a sign language service (Italian Sign Language) to understand the opportunities of the media world, at the same time gaining awareness of the possible risks.

# INSIGHTS GLOBAL REPORTING INITIATIVE (GRI) AND EU TAXONOMY (Regulation 2020/852)

Methodological note .....	85
GRI 2 - General Disclosures .....	87
GRI 3 - Material Topics .....	126
Correlation Material Topics - Enterprise	
Risk Management .....	205
Environment .....	212
Human Rights   Discrimination .....	228
Employees .....	231
Suppliers .....	257
Customers .....	263
Civil Society .....	271
Industry Business Community .....	289
Linkage Legislative Decree 254/2016 .....	290
GRI Content Index .....	291
European Taxonomy .....	300
Independent Auditor's Report .....	320

# Methodological note

## Perimeter and criteria

The Consolidated Statement of Non-Financial Nature (hereinafter “Statement”) fulfills the obligations under Legislative Decree 254/2016 regarding the disclosure of non-financial information. The Statement presents the data and information that relate to TIM S.p.A. and its subsidiaries and fully consolidated companies as of December 31, 2022 (hereinafter “the TIM Group” or “the Group”), as presented in the Annual Financial Report<sup>(1)</sup>.

Environmental performance data are presented with scope limitations, based on significance criteria<sup>(2)</sup>. More generally, in each chapter and/or paragraph, if necessary, the scope is specified. These limitations are not relevant to the understanding of the company's activities, its performance, results, and the impact produced by the Group.

The Statement is a separate report from the Group Management Report and represents TIM's follow-up to its commitment to communicate its sustainability performance and achievements to its stakeholders, already started in previous years.

The 2022 Statement, prepared annually on the calendar year, meets the same deadlines as the Group Annual Financial Report and is published on March 30, 2023. For any information regarding the published document, the e-mail box is available: [Sustainability.Reporting@telecomitalia.it](mailto:Sustainability.Reporting@telecomitalia.it).

The Statement is prepared according to the Global Reporting Initiative (GRI) Sustainability Reporting Standards (in accordance with).

References to GRI disclosures are given within the text highlighted with the symbol [GRI No. disclosure].

In terms of internal control of the contents presented in the Statement, the Company has set up a system that provides:

- an internal control system, implemented on the digital platform used for data collection, designed to ensure the proper tracking and reporting of non-financial information;

(1) For BU Brazil, the KPIs that include Oi/Cozani are as follows: GRI 302-1; GRI 302-3; GRI 305-1; GRI 305-2; GRI 305-4.

(2) The reporting boundary of the Non-Financial Statement coincides with the Annual Financial Report, with the exception of environmental data for which, starting from the consolidation boundary of the Domestic BU, as reported in the Financial Report '22, threshold values were applied to the following items of the Domestic BU '21:

turnover (k€): 0.5% of turnover;

number of employees (no.): 0.5% of no.;

expenditure on energy and fluids (k€): 0.1% of expenditure.

The TIM Group companies included in the '22 environmental scope are listed below: TIM S.p.A., Sparkle Group (companies that meet the criteria), Fibercop S.p.A., Noovle S.p.A., Olivetti S.p.A., T elecontact Center S.p.A., Telenergia S.r.l., Telsy S.p.A., TIM Retail S.r.l., TIM Servizi Digitali S.p.A., as well as BU Brazil.



- the signing of a letter of attestation by the top individuals concerning the data constituting the paragraphs of the Statement under their responsibility.

Finally, at the end of the Statement there is information regarding the European Taxonomy.

In terms of external audit, the Statement is subject to limited examination (“limited assurance engagement”) by EY S.p.A., the Group's auditing firm, whose Report is available at the end of this Report.

Quantitative indicators not referring to any general or topic-specific disclosures of the GRI Standards, shown at the pages indicated in the Content Index, are not subject to limited examination by EY S.p.A.

This document was approved by the Board of Directors of TIM S.p.A. on March 15, 2023.

## GRI 2 - General Disclosure

**GRI 2-1** | Organization details

**GRI 2-2** | Entities included in the organization's sustainability reporting

**GRI 2-3** | Reporting period, frequency and contact point

**GRI 2-4** | Restatement of information

**GRI 2-5** | External assurance

**GRI 2-6** | Activities, value chain and other business relationships

**GRI 2-7** | Employees

**GRI 2-9** | Governance structure and composition

**GRI 2-10** | Nomination and selection of the highest governance body

**GRI 2-11** | Chair of the highest governance body

**GRI 2-12** | Role of the highest governance body in overseeing the management of impacts

**GRI 2-13** | Delegation of responsibility for managing impacts

**GRI 2-14** | Role of the highest governance body in sustainability reporting

**GRI 2-15** | Conflicts of Interest

**GRI 2-16** | Communication on critical concerns

**GRI 2-17** | Collective knowledge of the highest governance body

**GRI 2-18** | Evaluation of the performance of the highest governance body

**GRI 2-19** | Remuneration policies

**GRI 2-20** | Process to determine remuneration

**GRI 2-23** | Policy commitments

**GRI 2-24** | Embedding policy commitments

**GRI 2-25** | Processes to remediate negative impacts

**GRI 2-26** | Mechanisms for seeking advice and raising concerns

**GRI 2-27** | Compliance with laws and regulations

**GRI 2-28** | Membership associations

**GRI 2-29** | Approach to stakeholder engagement

**GRI 2-30** | Collective bargaining agreements

## GRI: 2-1 Organization details

**[GRI 2-1a]** Telecom Italia S.p.A., also referred to as TIM S.p.A.

**[GRI 2-1b]** The Parent Company is TIM S.p.A., joint-stock company organized under the laws of the Republic of Italy and listed on the Italian stock exchange.

**[GRI 2-1c]** TIM S.p.A. has its registered office in Milan and branch office and general management in Rome.

**[GRI 2-1d]** The TIM Group operates mainly in Europe, Brazil and, to a limited extent, Asia as reported in the Annual Financial Report available on the Group website.

## GRI: 2-2 Entities included in the organization's sustainability reporting

**[GRI 2-2a]** The Sustainability Report presents data and information that relate to the TIM Group.

**[GRI 2-2b]** In the Sustainability Report 2022, environmental performance data are presented excluding the following TIM Group companies: Olivetti Deutschland

GmbH, Noovle International SAGL, Noovle Malta Ltd, Noovle Sicilia S.c.a.r.l., Panama Digital Gateway S.A., Staer Sistemi Srl, Mindcity, Trust Technologies, Telecom Italia San Marino S.p.A., Telefonía Mobile Sammarinese S.p.A.

**[GRI 2-2c.i]** The Sustainability Report presents the data and information that relate to TIM S.p.A. and its subsidiaries and fully consolidated companies as of December 31, 2022, as presented in the Annual Financial Report. The Consolidated Financial Statements as of December 31, 2022 of the TIM Group have been prepared in compliance with the recognition and measurement criteria of the International Financial Reporting Standards issued by the International Accounting Standards Board and endorsed by the European Union (referred to as "IFRS"), as well as with the laws and regulations in force in Italy.

**[GRI 2-2c.ii]** The Sustainability Report, like the Consolidated Financial Statements, does not report changes regarding minority interests. April 2022 saw the consolidation of the mobile assets of the Oi Group, into TIM S.A. (Brazil), following the completion of the acquisition for a total consideration of approximately 7 billion reais (1,741 million euros).

**[GRI 2-2c.iii]** Environmental performance data are presented excluding companies reported in **[GRI 2-2b]** that do not meet the materiality criteria. The list of material issues of economic, environmental and social impact is derived on the full scope of the TIM Group as reported in the Consolidated Financial Statements.

## GRI: 2-3 Reporting period, frequency and contact point

**[GRI 2-3a]** The TIM Group's Sustainability Report, prepared on an annual basis, corresponding to the calendar year, respects the same period as the Group's Consolidated Financial Statements.

**[GRI 2-3b]** The Group Consolidated Annual Report, like the Sustainability Report covers the period from January 1, 2022 to December 31, 2022.

**[GRI 2-3c]** The TIM Group Sustainability Report is published following its approval by the Board of Directors on 3/15/2023, at the same time as the Consolidated Financial Statements. The punctual date of publication is reported in the Methodological Note of this document.

**[GRI 2-3d]** The contacts are: Institutional Communication, Sustainability & Sponsorship of TIM S.p.A. Via G. Negri 1 10123 Milan, Italy Tel: +39 06 3688 5092; e-mail address: [Sustainability.Reporting@telecomitalia.it](mailto:Sustainability.Reporting@telecomitalia.it), Web site: [www.telecomitalia.com](http://www.telecomitalia.com), Brazil: [respsocialcorp@timbrasil.com.br](mailto:respsocialcorp@timbrasil.com.br).

## GRI: 2-4 Restatements of information

**[GRI 2-4a.i] [GRI 2-4a.ii]** There were no significant changes in the information reported in the years 2020 and 2021.

April 2022 saw the consolidation of Oi Group's mobile assets into the BU Brazil.

## GRI: 2-5 External assurance

**[GRI 2-5a, b]** The selection of the auditor Ernst & Young ("EY") took place in 2018, based on the opening of a bidding process, following the applicable regulatory framework and taking into account that TIM S.p.A., as an Entity of Public Interest ("EIP"), is responsible for determining the selection process and preparing the bidding documents containing, among other things, the selection criteria. The Audit and Risk Committee, i.e., the Board of Statutory Auditors of TIM S.p.A. is responsible for the auditor selection procedure and validates the report prepared by TIM S.p.A. on the conclusions of the tender process. The auditor's appointment was endorsed by the TIM S.p.A. Shareholders' Meeting on March 29, 2019.

The current legislation (Legislative Decree 254/2016 transposing EU Directive 2013/34) requires the statutory auditor to verify the preparation of the Non-Financial Statement ("NFS") and the statutory auditor or other person authorized to perform statutory audits to verify the preparation of the Non-Financial Statement ("NFS") and to express his or her opinion about the compliance of the non-financial information with the prescribed methodologies and principles of preparation.

Bearing in mind that the subject of the audit service is the limited examination of the Consolidated Non-financial Statement of the TIM Group, the main audit procedures that the Auditor performs, both at the consolidated level and at the level of individual companies or divisions, are described within the section Responsibilities of the Auditor of the Audit Report.

In terms of the Company's responsibility, TIM S.p.A. proceeds to the preparation of the NFS and defines the design, implementation, and maintenance of an adequate internal control system for the preparation of a NFS that is not marred by significant errors due to fraud or unintentional behavior or events. It also issues, for each year of the audit, a certification letter, signed by the legal representative of TIM S.p.A., on the NFS compliance with the requirements of Articles 3 and 4 of Legislative Decree 254/2016 and the GRI Standards, on the reliability and completeness of the information and data contained therein, and on the truthfulness, completeness, and correctness of the documentation made available to the Auditors for their audits. The work is carried out by the Auditor in accordance with the provisions of the "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This principle requires planning and carrying out procedures in order to gain a limited level of confidence that the NFS will not contain significant errors. Therefore, the independent auditors, on the basis of the verification activities carried out and indicated in the Report itself, issue an audit report in which they state whether or not elements have come (or not) to their attention that suggest that the TIM Group NFS has not been prepared, in all significant aspects, in accordance with the requirements of Articles 3 and 4 of Legislative Decree 254/2016 and GRI Standards. This report is included in the Sustainability Report or NFS.

Finally, it should be noted that Legislative Decree 39/2010 in Art. 10 par. 1 "Independence and Objectivity" states that "The statutory auditor and the statutory auditing firm performing the statutory audit of a company must be independent of the company and must not be involved in any way in its decision-making process."

In this regard, it is confirmed that the TIM Group's auditing firm, EY, warrants that it is independent in accordance with the ethics and independence principles of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is based on the fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior.

Finally, it should be noted that, based on the Guidelines for the Appointment of the Group's Single Auditor, TIM S.p.A., in order to protect the independence of the Auditors, restricts the appointment of further appointments to the same Single Auditor to services and activities strictly related to the audit of financial statements/reporting packages.

## GRI: 2-6 Activities, value chain and other business relationships

**[GRI 2-6a]** TIM is the leading ICT group at the forefront of digital technologies in Italy and in Brazil. It develops fixed fiber network infrastructure that it makes available to the entire market, both through a widespread presence throughout the country and through Sparkle internationally. More information is available at the link: <https://www.gruppotim.it/en/group/about-us.html>

**[GRI 2-6b.i]** The TIM Group offers individuals and households fixed-line and mobile services and products for communication and entertainment, and accompanies small and medium-sized enterprises toward digitalization with a portfolio tailored to their needs. Cloud, IoT and Cybersecurity are at the heart of TIM Enterprise's end-to-end solutions for businesses and Public Administration, which realize the country's digital transformation by taking advantage of the largest Data Center network in Italy, the expertise of Group companies such as Noovle, Olivetti and Telsy, and partnerships with leading groups.

In Brazil, TIM Brasil is a major player in the South American communications market and a leader in 4G coverage.

Group companies have implemented numerous initiatives to protect minors from content that may harm their mental and physical development (e.g.,

content that is violent, pornographic, racist, offensive to religious feelings, etc.). For BU Domestic, there were no revenues from the sale of adult-only services or gambling-related revenues in the year 2022.

In addition, through Fondazione TIM in Italy and Instituto TIM in Brazil, the Group supports projects of high social interest.

**[GRI 2-6b.ii]** The TIM Group's purchases take place mainly in the two geographic areas where the Group's main activities are based, Italy and Brazil, and are mostly directed towards the categories of products and services listed below:

- Telecommunications Networks;
- Telecommunications Products;
- Information Technology;
- Professional and Technical Services;
- Electrical Power Systems.

The TIM Group, to its suppliers, recorded payments of a commercial nature, excluding payments made to Other Licensed Operators, of approximately 10 bn euros in 2022. In the Domestic BU, there are nearly 2,800 tier 1 suppliers in the supply chain (of which about 2,500 are local) and 1,800 tier 2 suppliers, for a total of about 4,600 suppliers<sup>(1)</sup>.

*(1) Supply chain data in BU Domestic pertains to the following companies: Telecontact Center S.p.A. - Olivetti S.p.A. - TI Sparkle S.p.A. - TI Trust Technologies S.r.l. - TI Ventures S.r.l. - Fibercop S.p.A. - TIM MY BROKER S.r.l. - TIM Servizi Digitali S.p.A. - Telecom Italia S.p.A. - Noovle S.p.A. - TI Sparkle Germany GmbH - TI Sparkle Netherlands BV - TI Sparkle France S.a.s. - TI Sparkle Austria GmbH - TI Sparkle Turkey - TI Sparkle Israel Ltd.*

*Regarding Tier 2 suppliers, the value shown refers to the total number of subcontracted suppliers, within BU Domestic, for the Network, IT, TLC and IS perimeters.*



**[GRI 2-6b.iii]** Domestically, TIM represents the largest network infrastructure in the Country with FTTx network coverage of Real Estate Technical Units exceeding 94%, of which 32% is Fiber to the Home (FTTH). TIM operates its mobile network and it develops wholesale network infrastructure that it makes available to other TLC operators.

Internationally, TIM offers global services to fixed/mobile operators, media and contents, OTTs, ISPs and enterprises through its subsidiary Sparkle, which is present in 32 countries with 164 PoPs and more than 600,000 km of fiber.

By the end of 2022, in the consumer and business market in Italy, TIM is positioned as a “premium brand” in terms of quality and offerings, serving more than 8 million retail users on fixed-line access and reaching more than 30 million mobile lines.

Thanks to Noovle, Olivetti and Telsy factories, TIM Enterprise realizes end-to-end solutions for Top customers and Public Administration companies in Italy, providing Connectivity, Cloud, IoT and Cybersecurity services.

TIM Brasil, as of December 2022, reaches a mobile customer base of more than 62 million with 100% coverage in 5,570 cities.

**[GRI 2-6c]** Polo Strategico Nazionale ([www.polostrategiconazionale.it](http://www.polostrategiconazionale.it)) is the company owned by TIM (45%), Leonardo (25%), CDP (20%) and Sogei (10%) whose mission is to build and manage a technologically innovative and independent cloud infrastructure to ensure security and economic and environmental sustainability in the management of data and applications of the Italian Public Administration.

**[GRI 2-6d]** TIM, in the domestic market, has decided to move from a vertically integrated operator structure to a new horizontal structure, divided into separate business entities: NetCo, the network that will also include domestic and international wholesale assets and activities; TIM Enterprise, dedicated to the segment of large Italian companies and the Italian Public Administration; and TIM Consumer, serving Italian households, individuals and small and medium-sized enterprises.

Such a strategy would mitigate risks related to regulatory constraints, reduce the level of debt, and optimize the focus on target markets.

In Brazil, as previously reported, there is the purchase of the mobile assets of the Oi S.A. Group.

## GRI: 2-7 Employees

### [GRI 2-7a]

	2022			2021			2020		
Total number of employees by gender and geographical area of the Group	Men	Women	Total	Men	Women	Total	Men	Women	Total
Italy	26,430	14,307	40,737	27,460	14,871	42,331	27,702	14,965	42,667
Brazil	4,644	4,751	9,395	4,629	4,696	9,325	4,736	4,673	9,409
More	185	60	245	195	62	257	197	60	257
Total personnel to payroll	31,259	19,118	50,377	32,284	19,629	51,913	32,635	19,698	52,333
Personnel under contract of employment	9	6	15	9	7	16	9	5	14
Total personnel	31,268	19,124	50,392	32,293	19,636	51,929	32,644	19,703	52,347

### [GRI 2-7b.i, b.ii, b.iv, b.v]

	2022		2021		2020	
Total number of employees by type of employment contract and gender in the Group	Men	Women	Men	Women	Men	Women
Total number of employees	31,259	19,118	32,284	19,629	27,891	15,020
of which fixed-term	111	93	111	87	71	68
of which permanent	31,148	19,025	32,173	19,542	27,820	14,952
of which full time	30,076	13,442	31,130	13,954	27,154	10,128
of which part time	1,183	5,676	1,154	5,675	737	4,892

2022

Total number of employees by type of employment contract and geographic area of the Group	Italy	Brazil	Other
Total number of employees	40,737	9,395	245
of which fixed-term	203	1	0
of which permanent	40,534	9,394	245
of which full time	35,633	7,643	242
of which part time	5,104	1,752	3

The new breakdown by geographical area is available from 2022; employees in Italy in 2021 were 42,331 and in 2020 42,667; abroad 9,582 in 2021 and 9,666 in 2020.

**[GRI 2-7b.iii]** There are no employees with discontinuous employment contracts in the Group.

**[GRI 2-7c]** For TIM S.p.A., Telsy, Telecontact, TI Sparkle, TI Trust Technologies, Olivetti, Noovle, and Fibercop, the survey was conducted by extrapolating data from the Group's IT systems. Data from other companies in the Group are provided directly by the companies themselves.

Data are expressed in head count. The average annual whole-head count was calculated by applying the arithmetic mean, for each type of staff, to the number of heads present at the end of each month of the year.

**[GRI 2-7d]** The data shown refer to head count present as of December 31, 2022 in TIM Group companies, broken down by each cluster and type of survey (by gender, contract type, hourly type, and territorial breakdown).

**[GRI 2-7e]** Compared to December 31, 2021 (51,913 heads), there is an overall decrease of 1,536 heads, of which 5,416 heads left the Group and 3,583 heads entered.

## GRI: 2-9 Governance structure and composition

**[GRI 2-9a]** The TIM Group's governance system is organized according to the traditional model and provides for a governing body (Board of Directors - BoD) which, as a rule, is organized through the establishment of internal committees, either stable or set up for specific operations. There is also a control body (Board of Statutory Auditors).

**[GRI 2-9b]** The BoD approved the establishment of the following internal committees:

- Nominating and compensation committee
- Audit and risk committee
- Related parties committee
- Sustainability committee

Each committee has its own regulations, approved by the BoD, in which the rules for its composition and appointment, operating rules, duties, powers are defined. Regulations of committees are available on the Group website.

**[GRI 2-9c.i]** As of December 31, 2022, the BoD consists of 1 executive member (CEO) and 14 non executive members (including the Chairman of the BoD). Please refer to the Group website ([www.gruppotim.it](http://www.gruppotim.it)) for any updates.

**[GRI 2-9c.ii]** As of December 31, 2022, the Board of Directors consisted of 15 members, 10 of whom were independent. On January 16, 2023, Arnaud Roy de Puyfontaine resigned as Director of the Company. As of the date of publication of this report, the BoD thus consists of 14 members, 10 of whom are independent. For any updates, please refer to the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

**[GRI 2-9c.iii]** On March 31, 2021, the Shareholders' Meeting renewed the administrative body for the three-year period 2021-2023. Detailed information is available on the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

**[GRI 2-9c.iv]** According to TIM's Corporate Governance Principles, it is not considered compatible with serving as a Director of TIM to hold directorships or supervisory positions in more than five companies, other than those subject to TIM's management and coordination or controlled by or affiliated with TIM, when they are (i) listed companies included in the FTSE/MIB index, or (ii) companies operating predominantly in the financial sector dealing with the public sector, or (iii) companies that perform banking or insurance activities.

In the case of Executive Directors in companies with the characteristics listed above, the limit is reduced to three of which under (i), (ii) and (iii).

There are no diversified thresholds to account for Directors' participation in board committees. If a Director holds offices in more than one company belonging the same group, only one appointment held within that group shall be taken into account when calculating the number of appointments.

More detailed information is available in the Report on Corporate Governance and Ownership Structure, published on the Group's website.

**[GRI 2-9c.v]** Article 9.1 of the Bylaws was applied in the appointment of Board members last March 31, 2021, which requires the presence on the BoD of members of the least represented gender in an amount of at least two-fifths of the total. As of December 31, 2022, female representation on the Board is six out of 15 Directors. Please refer to the Group website ([www.gruppotim.it](http://www.gruppotim.it)) for any updates.

In view of the preparation of the lists, a special guidance document to TIM shareholders on the composition of the BoD has been published (available on the Group's website), which sets as a priority objective the adequate competence and professional path of the members of the administrative body.

**[GRI 2-9c.vi]** TIM is in favor of diversity in the composition of the BoD, including the overriding goal of adequate competence and professional path of its members. Discrimination on the basis of ethnicity, nationality, country of origin, gender, sexual orientation, religion, political or other views is excluded.

No specific diversity policies have been adopted in relation to the composition of the BoD, the matter being deemed to be devolved to the shareholders, in the exercise of the rights of candidacy attributed to them by law and the Statute, with respect to the lists submitted by them, or to the responsibility of the outgoing Board, in the event of the exercise of the right to submit its own list, with disclosure of the selection process and the criteria by which it was governed.

**[GRI 2-9c.vii]** Curricula vitae and detailed information on current Directors of the Board are available on the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

**[GRI 2-9c.viii]** The only stakeholders represented on the BoD are the shareholders.

## GRI: 2-10 Nomination and selection of the highest governance body

**[GRI 2-10a]** Pursuant to TIM's Statute and Corporate Governance Principles, the BoD is appointed by the Shareholders' Meeting. Appointments are made in accordance with applicable statutory and regulatory provisions on the basis of lists submitted by shareholders or the outgoing BoD. The BoD establishes committees from among its members, composed of non executive Directors, the majority of whom are independent, with advisory and proposal-making functions, determining their powers and responsibilities.

**[GRI 2-10b.i]** Pursuant to the Statute, only shareholders who alone or together with other shareholders hold a total of shares representing at least 0,5% of the share capital entitled to vote at the Ordinary Shareholders' Meeting, or the lesser amount required by the regulations issued by the National Commission for Companies and the Stock Exchange, are entitled to submit lists.

**[GRI 2-10b.ii]** Article 9.1 of the Statute was applied for the appointment of the members of the Board last March 31, 2021, which requires the presence on the Board of members of the least represented gender to be at least two-fifths of the total. As of December 31, 2022, female representation on the Board is six out of 15 Directors. Please refer to the Group website ([www.gruppotim.it](http://www.gruppotim.it)) for any updates.

**[GRI 2-10b.iii]** Pursuant to the Statute, at least half of the directors drawn from each list must meet the independence requirements of Article 148 of Legislative Decree 58/1998 and/or the Corporate Governance Code of Borsa Italiana.

**[GRI 2-10b.iv]** The curricula vitae and skills summary (skill matrix) of Board members can be viewed on the Group website ([www.gruppotim.it](http://www.gruppotim.it)).

## GRI: 2-11 Chair of the highest governance body

**[GRI 2-11a]** The Chairman of the BoD does not hold executive positions within the organization.

**[GRI 2-11b]** Not Applicable

## GRI: 2-12 Role of the highest governance body in overseeing the management of impacts

**[GRI 2-12a]** The BoD plays a strategic guidance and oversight role, pursuing the overriding objective of shareholder value creation over a medium- to long-term horizon, while also taking into account the legitimate interests of the remaining stakeholders, with a view to the sustainable success of the Company.

The BoD has established the Sustainability Committee with advisory, propositional,

monitoring and investigative tasks to support and guide the activities of the board plenum and management, on the environmental, social and governance (ESG) aspects in terms of positioning, objectives, processes, and specific initiatives of the Group. In addition, as per the regulations, with respect to board processes, in addition to operating in direct support and direction of the activities of the board plenum, the Sustainability Committee is promptly involved with reference to the ESG profiles of the activities overseen by the remaining committees.

Specifically, the Committee interacts:

- a. with the Nomination and Remuneration Committee in relation to the possible inclusion in the Company's remuneration policy of ESG KPIs (including in the form of incentive parameters and targets), as well as in monitoring the adoption and implementation of measures to promote equal treatment and opportunities between genders within the corporate organization;
- b. with the Audit and Risk Committee in the investigation of non-financial disclosure (i.e. Sustainability Report/NFS) and in the analysis of ESG business risks.

**[GRI 2-12b]** The BoD, through the Sustainability Committee, assesses ESG oversight, defines the materiality/impact matrix, monitors ongoing corporate initiatives on the sustainability front, and defines ESG goals (starting with environmental ones, with specific focus on energy), according to overall corporate planning.



**[GRI 2-12b.i]** The Sustainability Committee, as a result of the reorganization of sustainability activities within the Group that took place during 2022, oversaw the new process for defining material issues of impact that redesigned the Group's stakeholder engagement.

More generally, TIM adopted in December 2020 the Engagement Policy by which the dialogue with the generality of stakeholders (customers, suppliers, Public Administration, employees, business community) was formalized; the Policy is consistent with the recommendations of the Corporate Governance Code of Borsa Italiana.

**[GRI 2-12b.ii] [GRI 2-12c]** The outcome of the processes are evaluated by the BoD periodically, and at least, for each financial year, when planning and reporting on ESG objectives as well as when preparing the annual NFS (Sustainability Report). The set of principles and rules that guide the execution of activities aimed at the pursuit of corporate objectives, the management of associated risks, and control and monitoring activities are defined within the regulatory tools (Policies, Procedures and Operating Instructions) that the Group adopts and disseminates to the entire organization, considering them fundamental knowledge management tools. In addition, roles and responsibilities related to the planning, execution and control of business activities are assigned to TIM personnel ensuring the necessary information flows, in accordance with defined hierarchical lines, role diversity and corporate mission.

## GRI: 2-13 Delegation of responsibility for managing impacts

**[GRI 2-13a.i]** Responsibility relating to the overall governance of the Company and the Group is assigned to the Chief Executive Officer, subject to the prerogatives reserved to the BoD by law, by TIM's Corporate Governance Principles, or by specific Board determinations.

Sustainability matters are handled by the Institutional Communication, Sustainability & Sponsorship Function, which reports directly to the CEO. The oversight of sustainability issues is also present in the mandate of the Functions that have the management of the organization's impacts on the economy, environment and people (Chief Human Resources & Organization Office, Procurement, Chief Network, Operations & Wholesale Office, etc.).

**[GRI 2-13a.ii]** As part of the Institutional Communication, Sustainability & Sponsorship Function, the new organizational structure 'Sustainability' was established in April 2022, representing a single function dedicated to the guidance, management and monitoring of the Group's sustainability policies and enabling to overview all aspects into which sustainability is declined - sustainability plan, projects and reporting - to be addressed organically, making the relationship between ESG planning and reporting continuous and fluid.

**[GRI 2-13b]** During 2022, the Sustainability Committee met with the head and the Institutional Communication, Sustainability & Sponsorship team at all meetings, regarding which the Chairman provided specific briefings to the BoD. The latter met with the Sustainability team at the approval of the NFS 2021.

## **GRI: 2-14 Role of the highest governance body in sustainability reporting**

**[GRI 2-14a]** The BoD annually approves the Sustainability Report based on the Sustainability Reporting Guidelines of the Global Reporting Initiative (GRI), bearing TIM's Consolidated Non-financial Statement, pursuant to Legislative Decree 254/2016.

This approval is preceded by a special investigation by the Audit and Risk Committee-which instructs financial and non-financial reporting for the period-and the Sustainability Committee.

For 2022 reporting, the process, carried out under the supervision of the endoconsiliar committees, led to the definition of a new NFS structure that better correlates sustainability projects with the Group's ESG Plan.

At its meeting on October 14, 2022, the Audit and Risk Committee approved the 2022 materiality/impact matrix, the basis for 2022 reporting.

**[GRI 2-14b]** Not Applicable

## **GRI: 2-15 Conflicts of interest**

**[GRI 2-15a]** As per the Company's Corporate Governance Principles, the members of the corporate bodies take their decisions independently, in the interest of the issuer and the generality of shareholders, giving timely disclosure of any extra-social interest they may have with respect to the transactions submitted to their examination for deliberative, propositional, investigative, advisory or control purposes. The Rules of the Board of Directors, published on the Group's website, regulate how to handle situations in which a Director has an interest, on his own behalf or on behalf of third parties, in a given transaction, in terms of information segregation, abstention from taking part in the board discussion and voting on the same. In compliance with the Consob Related Parties Regulations, the Company has, in addition, adopted a procedure for conducting transactions with related parties, which can be consulted on the Group website.

**[GRI 2-15b]** Disclosure of related party transactions in the reporting period is included in the Annual Financial Report, under Related Party Transactions.

## **GRI: 2-16 Communication of critical concerns**

**[GRI 2-16a]** The Board of Statutory Auditors and the Audit and Risk Committee of TIM S.p.A. are periodically informed about the whistleblowing activity carried out

through a summary report. Each semester, the Supervisory Board of TIM S.p.A. prepares a report, sent to the Company's Top Management and Control Bodies, summarizing the activities carried out, as well as a summary report of the reports received and the main initiatives taken.

**[GRI 2-16b]** In 2022, 100 reports were received in Italy and 1,291 in Brazil. As for Italy, the 100 complaints, including 24 anonymous and 76 non-anonymous, are grouped as follows:

- 40 within the scope of the whistleblowing procedure (e.g., supplier relations, worker health and safety, alleged harassing or discriminatory behavior, inadequate procedures or controls);
- 60 not within the scope of the procedure (complaints, requests for information and clarifications), sent in any case to the relevant functions for the relevant checks with communication to the Audit Department of the outcome.

Information on historical data is available at the following link:

<https://www.gruppotim.it/en/group/governance/governance-tools/whistleblowing.html>.

In addition to the above numbers (i.e., whistleblowing numbers), during FY2022, the Board of Statutory Auditors received 15 reports directly, mostly complaining about technical inefficiencies and deficiencies of a commercial and administrative nature, as well as 4 complaints under Article 2408 of the Civil Code. On all such reports and complaints, the Board of Statutory Auditors carried out, with the support of the relevant offices of the Company, the appropriate investigations.

In the case of Brazil, of the 1,291 reports, 635 were anonymous and 656 were non-anonymous, classified as follows:

- 806 in the context of the whistleblowing procedure<sup>(2)</sup>;
- 330 customer reports (disservices);
- 155 not inherent to the objective of the procedure.

## GRI: 2-17 Collective knowledge of the highest governance body

**[GRI 2-17a]** The Institutional Communication, Sustainability & Sponsorship Function constantly updates the Sustainability Committee on sustainable development issues, which reports to the board plenum.

## GRI: 2-18 Evaluation of the performance of the highest governance body

**[GRI 2-18a]** The Board assesses annually, through formalized procedures, its effectiveness and the contribution of individual Directors including with regard to ESG issues. The results of this assessment are reported in the Annual Report on Corporate Governance and Ownership published on the Company's website ([www.gruppotim.it](http://www.gruppotim.it)).

(2) Of which 559 were “managerial” (processes that can be improved, etc.) and 247 from TIM S.A. (employees in crisis situations).

**[GRI 2-18b]** For the annual self-assessment of the Board and its Committees, the Society uses an independent external advisor.

**[GRI 2-18c]** Based on the evidence, the BoD identifies specific follow-up initiatives. As an example, a specific induction session on corporate governance issues was organized.

## GRI: 2-19 Remuneration policies

**[GRI 2-19a]** The policy on Directors' remuneration is defined in line with legal regulations and statutory provisions under which:

- the Shareholders' Meeting determines the gross annual global remuneration of the BoD (with the exception of the Directors holding special offices), the Statutory Auditors and the Chairman of the Board of Statutory Auditors; expresses itself - with a binding vote - on the first section of the Remuneration Report and with a non-binding vote on the second section of the same Report; resolves on compensation plans based on the allocation of financial instruments;
- the BoD decides, on the proposal of the Nomination and Remuneration Committee, on the distribution of the compensation determined by the Shareholders' Meeting; it defines, again on the proposal of the Committee, the remuneration policy for Executive Directors and executives with strategic responsibilities. The BoD is also responsible for making proposals to the

Shareholders' Meeting on compensation plans based on the award of financial instruments to directors and employees and for preparing the Remuneration Report.

**[GRI 2-19a.i]** Except for the CEO, directors receive only fixed compensation. More details at the following link:

<https://www.gruppotim.it/en/group/governance/remuneration/policy.html>.

Details of the components of fixed and variable remuneration (including any equity component), benefits and termination treatment awarded to the CEO and key management personnel are detailed in the Remuneration Report (for key management personnel the figure is in aggregate form) and available, in summary form, at the following link:

<https://www.gruppotim.it/en/group/governance/remuneration/policy.html>.

**[GRI 2-19a.ii]** For key management personnel, the awarding of bonuses untied by performance conditions is excluded. TIM exceptionally reserves the right to pay lump sums at the hiring stage in order to encourage the acquisition of resources possessing specific skills deemed essential for the achievement of strategic business objectives and who have accrued the right to specific deferred compensation from the Companies of origin.

**[GRI 2-19a.iii]** There are no notice/termination treatments for Board members. This is without prejudice to what may be provided in relation to the office of General Manager, held by the Chief Executive Officer.

The notice period for senior executives is set in the national collective bargaining agreement and differentiated according to seniority; it can be up to a maximum of 12 months.

Severance payments for senior executives are determined by law and the national collective bargaining agreement, with a maximum of 24 months' additional monthly payments.

Any mitigation clauses are included in the termination agreements.

As per policy, for Executive Directors, in the event of termination without just cause, an indemnity equal to the remuneration due for the office is paid until the natural expiration of the term of office, with a maximum of 24 monthly payments (calculated as the sum of the fixed and MBO component). With respect to the termination of the employment contract, the severance payment established by law and the national collective bargaining agreement is provided, with recognition of additional monthly payments in the maximum number of 24 (calculated on the fixed component). In the event of termination of the employment relationship of executives with strategic responsibilities, in the absence of just cause for dismissal, it will be the responsibility of the CEO to identify the resources that - due to the relevance and strategic nature of the role held - may be recipients of severance pay, to which a non-competition agreement may be associated, depending on the relevance and strategic nature of the role held, for a maximum period of one year calculated on the fixed remuneration.

**[GRI 2-19a.iv]** In the three years following the payment of the variable compensation component award, the clawback clause of the disbursed amounts may be activated, as per policy.

**[GRI 2-19a.v]** Details of the components of fixed and variable remuneration (including any equity component), benefits and termination treatment awarded to the CEO and key management personnel are detailed in the Remuneration Report (for key management personnel the figure is in aggregate form) and available, in summary form, at the following link:

<https://www.gruppotim.it/en/group/governance/remuneration/policy.html>.

**[GRI 2-19b]** The goals assigned to the CEO, for 2022, are economic-financial and ESG. Details are available at the link:

<https://www.gruppotim.it/en/group/governance/remuneration/policy.html>.

The TIM Group's remuneration policy is aimed at supporting the achievement of the guidelines set out in the Company's Strategic Plan by adopting an appropriate balance of performance parameters of the short-term and long-term incentive systems for the achievement of strategic objectives.

The short-term and long-term incentive systems include both economic-financial targets derived from the three-year Business Plan for the period, targets linked to share performance, and ESG targets.

With regard to the MBO system, for 2022, the ESG target was confirmed with a weight of 22%, both for the CEO, for key executives and for all incentivized personnel, highlighting the centrality of the two essential stakeholders for the

Company, external customers (with Customer Satisfaction goals) and employees (with Employee Engagement and Gender Pay Gap goals).

Like the long-term incentive plans launched in 2020 and 2021, the 2022-2024 stock option plan also combines macroeconomic and equity targets with two growth targets on the gender gap and renewable energy consumed, with a combined weight of 30%.

**[GRI 2-19a.iii]** There are no notice/termination treatments for the BoD (this is without prejudice, of course, to what may be provided in relation to the position of General Manager, held by the CEO).

## GRI: 2-20 Process to determine remuneration

**[GRI 2-20a.i]** The Remuneration Policy is approved by the Board, upon the proposal of the Nomination and Remuneration Committee, which is composed exclusively by independent directors, and is submitted to the Shareholders' Meeting, which is called upon to express a binding vote on the matter.

**[GRI 2-20a.ii]** TIM values dialogue with its shareholders and institutional investors on compensation issues, aware of the importance of shareholder involvement in both the definition and verification of the implementation of the Policy for the Remuneration of Directors and Executives with strategic responsibilities.

Of particular importance is the analysis on assembly voting. Dialogue with its shareholders and institutional investors is conducted through various communication tools and channels, including meetings, conference calls, and the concluding shareholders' meeting event supported by the provision of detailed and complete information.

**[GRI 2-20a.iii]** In order to carry out its functions, the Committee (whose meetings are attended by the Chairman of the Board of Statutory Auditors or, in the event of his inability, another Statutory Auditor designated by him) avails itself of the collaboration of the competent structures of the Company (mainly Chief Human Resources & Organization Office, Chief Financial Office) and may avail itself of the support of external consultants independent of the members of the BoD and of the Top Management. Details of activities, broken down by quarters are available at the following link:

<https://www.gruppotim.it/en/group/governance/remuneration/policy.html>.

**[GRI 2-20b]** The summary report of Shareholders' Meeting voting on agenda items, including Remuneration Policy, can be found on the Group website. In particular, the findings of the last Shareholders' Meeting - on remuneration policies and proposals - are available at the following link:

<https://www.gruppotim.it/en/investors/shares/agm/assembly-7-04-22.html>.



## GRI: 2-23

### Policy commitments

	[GRI 2-23a.i]	[GRI 2-23a.ii]	[GRI 2-23a.iii]	[GRI 2-23a.iv]	[GRI 2-23b.i]	[GRI 2-23b.ii]
	The intergovernmental reference instruments	Due diligence	Application of the precautionary principle	Respect for Human Rights	Internationally recognized human rights	Stakeholders to whom TIM pays special attention
Code of Ethics and conduct of the Group	Global Compact: TIM has joined the Global Compact sponsored by the Organization for the United Nations.	Based on risk assessment, the Company provides specific due diligence processes with respect to commitments made.	Application of the precautionary principle not explicitly stated.	Yes.	TIM S.p.A. has adhered to the Global Compact promoted by the United Nations Organization on human rights, labor standards, environmental protection and anti-corruption, and ensures full implementation of this institutional commitment through the implementation of timely initiatives on environmental and social issues.	The Group's Code of Ethics and Conduct addresses the following stakeholders: People, Third Parties, Customers, Suppliers, Business Community, Institutions and Regulatory Bodies, Financial Community and Civil Society.

*continued*

## Policy commitments

	[GRI 2-23a.i]	[GRI 2-23a.ii]	[GRI 2-23a.iii]	[GRI 2-23a.iv]	[GRI 2-23b.i]	[GRI 2-23b.ii]
	The intergovernmental reference instruments	Due diligence	Application of the precautionary principle	Respect for Human Rights	Internationally recognized human rights	Stakeholders to whom TIM pays special attention
Policy Respecting Human Rights in the TIM Group	<ul style="list-style-type: none"> <li>- UN Universal Declaration of Human Rights, 1948;</li> <li>- UN International Covenant on Civil and Political Rights, 1976;</li> <li>- UN International Covenant on Economic, Social and Cultural Rights, 1976;</li> <li>- 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;</li> <li>- UN Global Compact, 1999;</li> <li>- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998;</li> <li>- International Labor Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy;</li> <li>- European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights; 2013;</li> <li>- OECD, Guidelines for Multinational Enterprises, 2011.</li> </ul>	TIM carried out due diligence on Human Rights using the OCAI (Organisational Capacity Assessment Instrument) tool created by Twentyfifty Ltd. with funding from the Global Compact Network Germany Foundation.	Application of the precautionary principle not explicitly stated.	Yes, basically all of them (with high attention to those impacted by virtue of TIM's core-business, i.e., the protection of privacy of customers and employees, the right to freedom of expression-especially online freedom of expression-the rights potentially violated by value-added services-including services with adult-only content and gambling).	All internationally recognized Human Rights.	All stakeholders, including vulnerable groups (e.g., minors, elderly, disabled, supplier workers, etc.).

*continued*

## Policy commitments

	[GRI 2-23a.i]	[GRI 2-23a.ii]	[GRI 2-23a.iii]	[GRI 2-23a.iv]	[GRI 2-23b.i]	[GRI 2-23b.ii]
	The intergovernmental reference instruments	Due diligence	Application of the precautionary principle	Respect for Human Rights	Internationally recognized human rights	Stakeholders to whom TIM pays special attention
Anti-Corruption Policy	National and international regulations such as FCPA and UK Bribery Act.	Yes, TIM S.p.A. carries out due diligence activities on third parties, and during 2022, no red flags attributable to bribery hypotheses were revealed.	Application of the precautionary principle not explicitly stated.	The Anti-Corruption Policy does not deal with issues related to Human Rights, which are dealt with in the separate Policy “Respecting Human Rights in the TIM Group.”	The Anti-Corruption Policy does not deal with issues related to Human Rights, which are dealt with in the separate Policy “Respecting Human Rights in the TIM Group.”	The Anti-Corruption Policy does not deal with issues related to Human Rights, which are dealt with in the separate Policy “Respecting Human Rights in the TIM Group.”
Fiscal Strategy	OECD “Co-operative Compliance - A Framework; From Enhanced Relationship to Co-operative Compliance”; OECD GUIDELINES “Building better tax control framework.	Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.
Whistleblowing procedure	- Legislative Decree No. 231/01 “Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of Law No. 300 of September 29, 2000” - Regulation (EU) No. 2016/679 on the protection of personal data (c.d. GDPR) - Legislative Decree 196/03 and subsequent amendments and additions, as well as related legislative provisions - Law No. 179 of November 30, 2017 “Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship.”	The procedure does not include due diligence processes by external agencies.	Not applicable.	The whistleblowing procedure governs the process of receiving and handling reports also inherent in the failure to respect human rights.	The procedure covers the following types of human rights as defined in the Group Human Rights Policy: * human rights in general * non-discrimination * labor issues.	The whistleblowing procedure applies to all stakeholders.

continued

## Policy commitments

	[GRI 2-23a.i]	[GRI 2-23a.ii]	[GRI 2-23a.iii]	[GRI 2-23a.iv]	[GRI 2-23b.i]	[GRI 2-23b.ii]
	The intergovernmental reference instruments	Due diligence	Application of the precautionary principle	Respect for Human Rights	Internationally recognized human rights	Stakeholders to whom TIM pays special attention
Policy Human Resources, Organization & Real Estate TIM Group	The Group's commitment to the respect and protection of Human Rights and labor standards is reaffirmed in the Code of Ethics, the Human Rights Respect Policy and the Group Organizational Model, which are inspired by the ten Principles of the UN Global Compact on Human Rights, Labor Standards, Environmental Protection and Anti-Corruption.	Yes, the commitments include due diligence because all activities that may adversely affect compliance with Human Rights are subject to periodic internal due diligence, carried out on the basis of the Guiding Principles on Business and Human Rights, approved by the UN Human Rights Council in June 2011.	Should the self-assessment process reveal a situation of potential risk with reference to the Human Rights issue, the function concerned is required to communicate the relevant action plan for the purpose of monitoring its progress.	The TIM Group is committed to being a proactive leader in Human Rights-related initiatives and networks at both local and international levels, both sectoral and cross-sectoral.	The TIM Group applies the "Code of Ethics and Conduct of the TIM Group," the policy "Respecting Human Rights in the TIM Group," the policy "Managing Incidents of Gender, Sexual and Bullying Harassment," and the operating procedure "Adaptation of Workstations and Work Environments for Persons with Disabilities or Chronic Illnesses - Disabling," and also adheres to the United Nations Global Compact.	The Group's commitment to Human Rights is stated in the Code of Ethics and Conduct and in all relevant policies, such as those concerning Human Resources, Sustainability in the TIM Group, suppliers, and customers, particularly the most vulnerable (e.g., minors and the disabled).

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## Policy commitments

	[GRI 2-23a.i]	[GRI 2-23a.ii]	[GRI 2-23a.iii]	[GRI 2-23a.iv]	[GRI 2-23b.i]	[GRI 2-23b.ii]
	The intergovernmental reference instruments	Due diligence	Application of the precautionary principle	Respect for Human Rights	Internationally recognized human rights	Stakeholders to whom TIM pays special attention
Products and services purchasing policy	Internal references such as: Code of Ethics and Conduct, in the 231 Organizational Model, TIM's Anti-Corruption Management System, the Group Anti-Corruption Policy and the Policy "Respecting Human Rights in the TIM Group."	Application of sustainability principles in supplier selection and monitoring processes. The level of compliance with the principles is assessed and measured in the supplier evaluation/control processes and in the selection of services/products, with specific operational methods for each acquisition/supplier category. Also in cooperation and through agreements with partners or other telecom operators, such as under the Joint Audit Cooperation - JAC initiative ( <a href="http://jac-initiative.com">http://jac-initiative.com</a> ) of which TIM is a founding member.	Application of the precautionary principle not explicitly stated.	Yes.	The purchasing process aims to ensure, throughout the supply chain, constant compliance with TIM Group's values of ethicality and sustainability, requiring similar formal commitment from suppliers and promoting, through them, respect for legality, human and personal rights, environmental sustainability and occupational health/safety and the provisions of TIM's Anti-Corruption Management System. To this end, contracts must always provide that TIM and the TIM Group Companies reserve the right to carry out verification and audit activities on suppliers and the services they are responsible for, in compliance with the regulatory and procedural framework in force.	The Code of Ethics and Conduct, Organizational Model 231, TIM's Anti-Corruption Management System, Group Anti-Corruption Policy, and the Policy "Respecting Human Rights in the TIM Group" set out the basic principles underlying the TIM Group's commitment to respecting the environment, protecting human rights and labor standards, and fighting corruption.

## Commitment in terms of Policy

	[GRI 2-23c]	[GRI 2-23d]	[GRI 2-23e]	[GRI 2-23f]
	Link	Approval or last update	Extension of commitment	Communication of commitment
Telecom Italia Group Code of Ethics and Conduct	<a href="#">code-ethics.html</a>	BoD - October 3, 2013. It should be noted that the Company is in the process of adopting a new version of the Code of Ethics and Conduct, which is soon to be approved by the Board of Directors.	Commitments cover all TIM Group activities for which the Code of Ethics and Conduct is directly applicable.	Commitments are communicated to all stakeholders through: the institutional website, the corporate intranet, as well as the appropriate inclusion of contractual clauses regarding the acknowledgment and/or compliance with the Group Code of Ethics and Conduct.
Policy Respecting Human Rights in the TIM Group	<a href="#">policy-diritti-umani.pdf</a>	Chairman of the Board, September 29, 2015.	TIM Group activities and related value chain.	The policy-drafted in Italian, English and Portuguese-was communicated to the Group's people, suppliers and partners through the TIM website, and was discussed within the German and Italian networks of the UN Global Compact.
Anti-Corruption Policy	<a href="#">anti-corruption-system.html</a>	The latest version of the Anti-Corruption Policy was approved by the Board of Directors of TIM S.p.A. on February 14, 2022.	The Anti-Corruption Policy applies to TIM S.p.A. and members of corporate bodies, employees and collaborators in various capacities of the Company. The Policy applies to TIM Group Subsidiaries and TIM Foundation: domestic and foreign listed companies and companies certified under UNI EN ISO 37001 may implement this Policy by establishing their own policies in compliance with the principles stated in the Policy. In relation to joint ventures and Subsidiaries, TIM will use its influence, to the extent reasonable under the circumstances, to ensure that these companies and entities comply with the standards and rules of conduct set out in the Anti-corruption Policy. The Policy is intended to be known by: - TIM's employees, management and members of corporate bodies - Subsidiaries and/or Subsidiaries - Third Parties - Certification Bodies.	Commitments are communicated through: the institutional website, the corporate intranet, as well as the appropriate inclusion of contractual clauses regarding acknowledgment and/or compliance with the Group Anti-Corruption Policy. In addition, TIM S.p.A. publishes on the Group Supplier Portal the Code of Ethics and Conduct, the Anti-Corruption Policy and the Anti-Corruption Manifesto.

continued



## Commitment in terms of Policy

	[GRI 2-23c]	[GRI 2-23d]	[GRI 2-23e]	[GRI 2-23f]
	Link	Approval or last update	Extension of commitment	Communication of commitment
Fiscal strategy	Not applicable.	BoD December 15, 2022.	TIM Group.	It is made public on the Group's website.
Whistleblowing procedure	<a href="#">Whistleblowing-Procedure.pdf</a>	The current whistleblowing procedure (currently under review) was approved by the TIM Board of Directors on November 10, 2020.	The procedure applies to any business relationship.	When a new version is issued, notice is given, including by e-mail, to employees.
Policy Human Resources, Organization & Real Estate TIM Group	<a href="#">Policy-Human-Resources-ENG.pdf</a>	The policy Policy HRO - TIM Group was approved by the Head of HRO Function in April 2021.	All TIM Group people and “workers” in its value chain.	The policy under review has been communicated to Group people, suppliers and partners, and has been discussed in the German and Italian UN Global Compact Networks and is on the institutional website.
Products and services purchasing policy	<a href="#">Suppliers-policy-2019.pdf</a>	The following first management carryovers: Procurement, Human Resources, Compliance and Legal Departments.	Group companies and TIM Foundation.	Addressees of the Policy are TIM S.p.A., the TIM Foundation and TIM Group Companies.

## GRI: 2-24

## Embedding policy commitments

	[GRI 2-24a.i]	[GRI 2-24a.ii]	[GRI 2-24a.iii]	[GRI 2-24a.iv]
	Responsibility for the implementation of commitments	Integration of commitments into organizational strategies, policies, and operating procedures	Implementation of commitments with and through business relationships	Training
Group Code of Ethics and Conduct	TIM S.p.A. and the companies of the TIM Group have an efficient and effective internal control and risk management system, in which the correct definition of tasks and responsibilities, the separation of roles with a consistent approach to operational delegations, the traceability of acts and transactions, the reliability of financial information, as well as compliance with laws, regulations and internal procedures are particularly important.	Policies, procedures, regulations and internal instructions, adopted at the company level and defined according to a specific procedural system structure, are aimed at ensuring that the values of the Code of Ethics and Conduct are reflected in the behavior of Group Companies and all its recipients. To this end, penalty systems for possible violations of the aforementioned Code shall be provided for and applied- where appropriate and subject to compliance with the regulations in force.	TIM S.p.A. inserts a special clause dedicated to taking vision/ observance of the Group's Code of Ethics and Conduct in stipulated contracts and carries out due diligence activities on Third Parties.	A specific section devoted to the Code of Ethics and Conduct was included in the training course on Organizational Model 231. As of December 31, 2022, this course has been completed by 29,343 employees of TIM S.p.A. and domestic subsidiaries and is being completed by the remaining employees (on target). In addition, planning has begun for specific training on the new Code of Ethics and Conduct (in the process of being approved) to take place in 2023.
Policy Respecting Human Rights in the TIM Group	The Human Resources & Organization Function is responsible for compliance with this document as it relates to the involvement of TIM people, the Procurement Function is responsible for compliance with it as it relates to the involvement of TIM suppliers, the Compliance Function oversees the risk of non-compliance with relevant regulations, and the Sustainability Function is responsible for updating the policy, involving stakeholders.	All TIM Group functions are encouraged to explicitly refer to this policy (and Human Rights) in their operating policies and procedures and management systems (e.g., with respect to the environment, health and safety, and nondiscrimination).	The TIM Group supports and encourages its partners to approve: - UN International Charter of Human Rights; - the Declaration on Fundamental Principles and Rights at Work, issued by the ILO; - the Guiding Principles on Business and Human Rights approved by the UN Human Rights Council; - the Guidelines for Multinational Enterprises, issued by the OECD; - the ISO 26000 Guidelines.	Online (In)training course on Human Rights and more.

continued

## Embedding policy commitments

	[GRI 2-24a.i]	[GRI 2-24a.ii]	[GRI 2-24a.iii]	[GRI 2-24a.iv]
	Responsibility for the implementation of commitments	Integration of commitments into organizational strategies, policies, and operating procedures	Implementation of commitments with and through business relationships	Training
Anti-corruption Policy	<p>The BoD has identified the Compliance Department as the Compliance Function for the prevention of corruption, which is responsible for implementing and monitoring the Anti-Corruption Management System within the corporate organization and, more generally, for ensuring that the Anti-Corruption Management System complies with the requirements of the ISO 37001:2016 Standard. In particular, the Compliance Function supports the 231 Steering Committee and TIM Management in the implementation of the Anti-Corruption Management System. In addition to the aforementioned Compliance Function, TIM S.p.A., in order to ensure the effectiveness of its activities in preventing and combating Bribery, has assigned the leadership of its Anti-corruption Management System to the following corporate entities:</p> <p>1) the Board of Directors and the Audit and Risk Committee play the role of the Governing Body according to ISO 37001</p> <p>2) the 231 Steering Committee plays the role of Senior Management according to ISO 37001 and has overall responsibility for the operation of the Anti-Corruption Management System, ensuring the definition of initiatives for the effective adoption of the Anti-Corruption Management System by the relevant business functions.</p> <p>3) Management ensures that the requirements of the Anti-Corruption Management System are implemented and complied with in the areas of responsibility.</p>	<p>The Anti-Corruption Management System includes an organic set of objectives with three levels:</p> <p>1) Strategic Objectives: these are the general objectives of the Anti-Corruption Management System, referable to the Code of Ethics and Conduct and declined in the Anti-Corruption Policy, the pursuit of which is the responsibility of the corporate bodies, all TIM personnel and Third Parties in business relations with the Company.</p> <p>2) Organizational objectives: these objectives, identified in the Anti-Corruption Policy in relation to the processes at risk, consist of the implementation of all the organizational measures provided therein</p> <p>3) Operational objectives and planning: these are the objectives reflected in the Anti-Corruption Management System Plan prepared by the Compliance Department, which considers the balance of the activity carried out during the year and plans the activities to be carried out in the following year.</p>	<p>TIM publishes the Group's Code of Ethics and Conduct, Anti-Corruption Policy and Anti-Corruption Manifesto on the Group's supplier portal and includes a special "anti-corruption clause" in the contracts it enters into, under which it requires compliance with both anti-corruption regulations (including U.S.- FCPA - and British - Bribery Act - regulations) and adopted Anti-Corruption Policies. Finally, the Company carries out due diligence activities on Third Parties.</p>	<p>Anticorruption training is provided through an e-learning course open on the internal training platform "TIM Academy" and accessible to all employees of TIM S.p.A. and the Group's domestic subsidiaries. In addition, specific training on the subject is provided in the webinar track dedicated to new hires. As of December 31, 2022, e-learning training on the 231 Organizational Model has been completed by 29,343 employees of TIM S.p.A. and domestic subsidiaries and is being completed by the remaining employees (in target).</p>

continued

## Embedding policy commitments

	[GRI 2-24a.i]	[GRI 2-24a.ii]	[GRI 2-24a.iii]	[GRI 2-24a.iv]
	Responsibility for the implementation of commitments	Integration of commitments into organizational strategies, policies, and operating procedures	Implementation of commitments with and through business relationships	Training
Fiscal strategy	The TIM Group has adopted a tax risk management and control system that provides for a governance model designed to ensure that: i. top management is informed of the tax impacts related to all strategic and operational business operations, planned and to be implemented, in order to ensure the consistency of business decisions with the defined tax strategy; ii. the Tax Function is involved in the performance of ordinary and extraordinary business activities, in order to ensure a prior assessment of the tax implications of the aforementioned activities, to ensure the proper management of the tax variable.	To ensure effective tax risk management, the TIM Group has equipped itself with a system for the detection, measurement, management and control of tax risk (Tax Control Framework), governed by a specific Tax Policy, which provides: 1. a clear assignment of roles and responsibilities; 2. effective procedures for the detection, measurement, management and control of tax risks; 3. effective internal procedures aimed at ensuring, at all levels of the company, compliance with tax obligations; 4. effective procedures to remedy any deficiencies found in the functioning of the system and to activate the necessary corrective actions; and 5. reporting to the management bodies, through the provision of a report, at least annually, on the activities carried out.	The TIM Group does not implement operations that primarily pursue a tax advantage and do not respond to business logic, i.e., operations carried out “artificially” for the sole purpose of reducing taxation. In addition, TIM, as part of its business activities, has adopted procedures for qualifying its counterparties (customers and suppliers), including for the purpose of preventing the commission of tax offenses.	The TIM Group trains and supports all personnel involved in the management of tax-relevant activities, not limiting itself to resources specifically dedicated to tax matters, in order to ensure that all employees have the right skills and experience to fulfill their responsibilities. In order to achieve the above goal, TIM also invests in the professional growth of staff through specific voluntary online training plans.

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## Embedding policy commitments

	[GRI 2-24a.i]	[GRI 2-24a.ii]	[GRI 2-24a.iii]	[GRI 2-24a.iv]
	Responsibility for the implementation of commitments	Integration of commitments into organizational strategies, policies, and operating procedures	Implementation of commitments with and through business relationships	Training
Audit - Policy Commitments	<p>The whistleblowing procedure governs the process of receiving, analyzing and managing reports concerning the TIM Group, the ownership of which is attributed to the Supervisory Bodies of each of the Group companies, without prejudice to the responsibilities and prerogatives of the Boards of Statutory Auditors for reports addressed to them. The handling of reports is carried out with the support of TIM's Audit Department.</p> <p>Commitments defined as a result of in-depth investigations of reports are attributed to the heads of the relevant functions, whose objectives include meeting agreed deadlines for resolving critical issues.</p>	<p>The whistleblowing procedure cuts across all organizational strategies, policies, and operating procedures.</p>	<p>The whistleblowing procedure cuts across all business relationships.</p>	<p>As part of the periodic training refreshments conducted on the subject of Organizational Model 231, there is a reference to the whistleblowing procedure.</p> <p>In addition, a specific video pill was published on the corporate intranet in 2022, and all Group employees were informed about it via e-mail.</p>

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## Embedding policy commitments

	[GRI 2-24a.i]	[GRI 2-24a.ii]	[GRI 2-24a.iii]	[GRI 2-24a.iv]
	Responsibility for the implementation of commitments	Integration of commitments into organizational strategies, policies, and operating procedures	Implementation of commitments with and through business relationships	Training
Policy Human Resources, Organization & Real Estate TIM Group	Although responsibility for the policy resides with the HRO Director, who reports directly to the CEO, managers are responsible for building and sustaining an environment in which People can best express their human and professional qualities to ensure the success of the Group.	TIM promotes work-life balance by bringing agile working as an integral part of the new organizational model. Group Companies ensure full compliance with the legislative provisions on occupational diseases, health and safety in the workplace aimed at preventing possible accidents and damage to health in any way related to the performance of work. TIM assesses risks to worker safety and health with a view to their progressive minimization by adopting the principles, standards and solutions that constitute “best practices.” Awareness and involvement on health and safety policies and objectives and related to internal control systems, as well as training and information on the risks and control measures taken, are considered key tools for achieving the expected results.	TIM maintains open and transparent relations with labor unions and employee representatives, believing that only through continuous and constructive discussion can we arrive at the best balanced solutions with respect to the expectations of all stakeholders. The Group Companies widely recognize the role of workers' union representatives, who are not subject to any form of discrimination, and also guarantee paid leave and necessary means of communication with workers in the workplace to carry out their union activities. The signed union agreements provide for joint review sessions on the contents defined in the understandings. In addition, consistent with the system of industrial relations, special joint bodies are established to discuss the state of the art of the programs defined in the relevant agreements.	The Group encourages all its stakeholders to provide feedback on the policy in order to improve it. Following the publication of the Policy, an online course was created for the entire corporate population, which has been available since the end of 2015. The course, which was updated in fall 2018, was included in the TIM Academy e-learning platform for Group employees.

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## Embedding policy commitments

	[GRI 2-24a.i]	[GRI 2-24a.ii]	[GRI 2-24a.iii]	[GRI 2-24a.iv]
	Responsibility for the implementation of commitments	Integration of commitments into organizational strategies, policies, and operating procedures	Implementation of commitments with and through business relationships	Training
Products and services purchasing policy	Recipients are TIM S.p.A., the TIM Foundation and TIM Group Companies. Specifically, within TIM S.p.A. the Functions concerned are: Procurement Function, User Functions, Chief Financial Office and Legal & Tax.	What is set out in the Policy applies to all Group Companies and is directly applicable to purchases made by the Procurement Function for itself and for Italian and foreign Group companies that have given the latter a suitable purchasing mandate. For Group Companies that have not mandated TIM to purchase or have mandated it partially, this document is a “framework” and it is therefore the responsibility of the Companies to have their own specific policy for deploying this document.	TIM ensures, throughout the supply chain, constant compliance with the Group's values of ethicality and sustainability, requiring similar formal commitment from suppliers and promoting, through them (and any subcontractors), respect for legality, human and personal rights, environmental sustainability and occupational health/safety and the provisions of TIM's Anti-Corruption Management System. To this end, contracts must always provide that TIM and the TIM Group Companies reserve the right to carry out verification and audit activities on suppliers and the services they are responsible for, in compliance with the regulatory and procedural framework in force.	Where appropriate, and without prejudice to the independent responsibility of the supplier/partner, TIM may allow them access to specific training activities, with a view to a relationship of mutual cooperation  Specifically, under the initiative called JAC, there is the JAC Academy project, which through a “supplier development program” contributes to the training of suppliers on ESG issues, and provides tools for tier 2 and 3 involvement and evaluation.  In addition to the training initiative provided by the JAC Academy, there is the approach provided by the Open-es platform, which supports and guides providers in defining a plan to grow their ESG performance.

## GRI 2-25: Processes to remediate negative impacts

**[GRI 2-25a, b, c, d, e]** TIM S.p.A. and/or TIM Group provide reporting channels other than the whistleblowing channel, such as the following:

(i.) in health, safety and environment:

- (a) internal reporting channel, accessible to every facility manager of the Company, regarding the Health, Safety and Environment component in implementation of the Regulation “Employer's delegations of authority in

the field of occupational safety and health and environmental protection - checks on the work of delegates” code 2019-00035;

- (b) reporting channels that can be activated by ARPA and/or ASL to TIM S.p.A. regarding any episodes of environmental pollution (acoustic, atmospheric, electromagnetic, soil, subsoil and waste, etc.)
- (c) internal reporting channel for complaints arising from construction site and network maintenance activities (noisy manhole covers, broken sub-services at construction site, etc.);

(ii.) in the area of security:

- a) Internal reporting channel through which employees, who become aware of a security vulnerability on TIM-branded systems, business applications or products that can be used from the Internet, can send a report to the segnalaci-una-vulnerabilita@telecomitalia.it box following the procedures and constraints specified in Useful Links of the TIM S.p.A. Intranet;
- (b) The TIM Group has equipped itself with the E.R.M.E.S. portal related to security incident reports, affecting human, tangible and intangible resources;
- (c) channel c.d. SOC (Service Operations Center) that ensures H24 monitoring of critical events and management of cybersecurity incidents in conjunction with the appropriate functions;
- d) the TIM Group provides a special form dedicated to reporting incidents 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 unlawful acts or causing damage to third parties, in violation of company rules and/or legislative provisions.”
- (e) reporting channel with regard to spam emails accessible through employees' inboxes;

(iii.) in customer care:

- reporting channels (human and not human) for network malfunction and/or other disruptions.

## GRI 2-26: Mechanisms for seeking advice and raising concerns

**[GRI 2-26a.i]** The procedures for requesting clarification are provided in the whistleblowing procedure<sup>(3)</sup>.

**[GRI 2-26a.ii]** Methods of requesting clarification are provided within the Reporting Portal (available at <https://portalesegnalazioni.telecomitalia.it/>).

In Brazil, TIM S.A. makes available the “whistleblowing channel,” in two languages (Portuguese and English), accessible via the Internet or through the company's intranet ([tim.com.br](http://tim.com.br) and [ri.tim.com.br](http://ri.tim.com.br) > ESG > Governança > Canal de Denúncias), or at the number (0800 900 8007), available 24/7. The full policy is available at the link: [site.tim.com.br/sp/canal-de-denuncias](http://site.tim.com.br/sp/canal-de-denuncias).

<sup>(3)</sup> Page 3 of the whistleblowing procedure (regarding its “purpose and scope”) states the following: “The Procedure applies to TIM and the TIM Entities, which ensure its correct and constant application, as well as its maximum dissemination internally, while respecting the obligations of confidentiality and the prerogatives of autonomy and independence of each Company. The Procedure also serves as a reference for TIM subsidiaries other than TIM Entities, which may implement it, subject to regulatory adaptation to specific and/or local processes and organizational arrangements.” In addition, on page 4 of the procedure in question (concerning the “Glossary”), the following is stated: “TIM Entities: means the domestic subsidiaries of the TIM Group, the TIM Foundation, Telecom Italia San Marino S.p.A. and Telefonía Mobile Sammarinese S.p.A, to which the Procedure applies directly.”

## GRI 2-27: Compliance with laws and regulations

### [GRI 2-27a] Non-compliance with laws and regulations

TIM S.p.A.	2022
Cases in which TIM has incurred a monetary penalty	3
Cases in which TIM received a non-monetary penalty	0
Total number of cases of noncompliance with laws and regulations	3

### Non-compliance with laws and regulations

BU Brazil	2022
Cases in which TIM has incurred a monetary penalty	93
Cases in which TIM received a non-monetary penalty	13
Total number of cases of noncompliance with laws and regulations	106

### [GRI 2-27b] Sanctions

TIM S.p.A.	2022	2021	2020
Total number of fines paid for cases of noncompliance with laws and/or regulations	3	3	9
Monetary value of fines paid in Euro	1,794,000	1,715,333	242,102,263

BU Brazil	2022
Total number of fines paid for cases of noncompliance with laws and/or regulations	6
Monetary value of fines paid in Reais	820,000

In Brazil, in 2022, TIM S.A. recorded 106 significant cases of non-compliance with laws and regulations, with a total amount of 820 thousand Reais:

- 47 cases involved administrative penalties related to environmental liabilities associated with permitting processes by municipal or state authorities, another 14 cases classified as potential legal losses. Of this total, fines have been applied to 59 cases, which are still awaiting a final administrative decision. Two fines were paid in 2022 (in the amount of 10 thousand Reais) and two cases generated non-monetary penalties;
- 21 significant administrative procedures at Anatel related to non-compliance with laws and regulations. 15 procedures resulted in fines and are being appealed to the Anatel Board of Directors and 2 others with non-pecuniary penalties. 4 procedures ended in 2022 with the payment of about 810 thousand Reais;
- 24 significant cases related to consumer rights:
  - 15 cases are still at the trial stage regarding the amount of the fine levied or the legal obligation for collective repayment;
  - 9 cases involve other legal obligations.

TIM, in Brazil, considers cases as significant based on the impact on business and fines exceeding 500 thousand Reais.

**[GRI 2-27c]** For TIM S.p.A., the total number and monetary value of fines by the AGCM<sup>(4)</sup> for non-compliance with laws and regulations regarding the provision and use of products and services in Italy with reference to unfair trade practice proceedings:

(4) Competition and Market Authority.

TIM S.p.A.	2022	2021	2020
number of fines	1	0	3
total value in Euro	1,000,000	0	7,100,000

Number and total monetary value of fines by AGCM for non-compliance with laws and regulations regarding the provision and use of products and services in Italy with reference to Antitrust proceedings:

TIM S.p.A.	2022	2021	2020
number of fines	0	0	2
total value in Euro	0	0	230,498,263

Number and total monetary value of fines by AGCOM<sup>(5)</sup> per le Garanzie nelle Comunicazioni for non-compliance with laws and regulations concerning the provision and use of products and services in Italy with reference to consumer protection proceedings:

TIM S.p.A.	2022	2021	2020
number of fines	2	3	4
total value in Euro	794,000	1,715,333	4,504,000

For 2022, a description is given below for each proceeding according to the year in which it related final deliberation:

- with reference to unfair business practice proceedings at AGCM, two resolutions concluding the following proceedings are noted. PS 10888, concerning the alleged activation of unsolicited services, concluded without imposition of the penalty. PS 12231, concerning the deceptiveness of web channel communication of the fixed telephony offer “TIM Magnifica,” concluded with the imposition of a penalty of 1 million Euro;
- with reference to antitrust proceedings at AGCM, no conclusive resolutions are reported;
- with reference to consumer protection proceedings at AGCOM, two resolutions concluding the following proceedings are noted. Resolution 91/22/Cons, regarding Premium Subscription Services for failure to activate appropriate tools for collecting consumer consent at the purchase stage, concluded with the imposition of a penalty of 754 thousand Euro. Dispute 2/21/DRS for failure to provide prior notice of a fixed network offer, concluded with the imposition of a penalty of 40 thousand Euro (Resolution No. 192/21/CONS).

In 2022, the following proceedings appear to be in progress:

- for unfair business practices at AGCM PS 12304 relating to the process of termination of the contractual relationship, with conclusion expected in March 2023, and PS 12384 relating to a maneuver of tariff reshaping of mobile offers, with conclusion expected in March 2023;
- Antitrust at AGCM: 1857 related to agreements with DAZN, and A556, related to the CONSIP tender for mobile phone services;

(5) Communications Guarantee Authority.

- for consumer protection at AGCOM there are no pending cases reported.

In addition, with reference to the A514 antitrust proceeding at AGCM that concluded in 2020, with a sanction on TIM of approximately 116 million of Euro, it should be noted that TIM appealed the final measure before the Lazio Regional Administrative Court, contesting both the lawfulness of the conduct challenged by AGCM and, in any case, the quantification of the sanction imposed. In ruling 1963/22 dated February 28, 2022, the appeal was dismissed by the Regional Administrative Court. TIM has, however, appealed to the Council of State whose hearing is scheduled for May 25, 2023. With reference to the I850 antitrust investigative proceeding at AGCM concluded in 2022 with the assumption of commitments by TIM, it should be noted that Open Fiber in April 2022 challenged before the Lazio Regional Administrative Court, after requesting the adoption of precautionary measures, the final measure of AGCM that made mandatory the commitments proposed by TIM, which according to the plaintiff would not be suitable to remove the anticompetitive profiles. As a result of the precautionary hearing on June 1, 2022, the TAR rejected Open Fiber's request and set the merits for January 25, 2023; following that hearing, a decision is pending.

During 2022, the Garante per la protezione dei dati personali did not conduct any inspection activities at TIM S.p.A., nor did it adopt any sanction measures considered “material” (i.e., exceeding one million Euro). In the past 3 years, the Garante per la protezione dei dati personali has adopted only one prescriptive and sanctioning “material” measure against TIM S.p.A: Measure 7/2020 of January

15, 2020. This Measure mainly concerned activities related to telemarketing to consumer customers; additional issues considered were the management of certain applications, the TIM Party program, data breaches, and data retention of OLO (Other Licensed Operators) customers. The total amount of the penalty was 27,8 million Euro, of which TIM S.p.A. paid 13,9 million Euro, having settled the dispute without recourse under current Italian law by paying, within the 30-day period, the amount equal to half of the penalty imposed. In addition, in compliance with the Garante's order, TIM S.p.A. has implemented the requirements of the order, especially with regard to the improvement of telemarketing processes and the system of internal controls, in compliance with the deadlines set by the Privacy Guarantor.

For the sake of completeness, it is represented that in the years 2022, 2021 and 2020 there were other sanctioning measures towards TIM S.p.A. of “not material” amounts.

Over the past three years, the Data Protection Supervisor has not adopted any sanctions against the other BU Domestic companies on which the information collection process was carried out.

**[GRI 2-27c]** The measure taken by the Data Protection Authority toward TIM S.p.A. in 2020 is considered “material” (i.e., amounting to more than one million euros); in the years 2021 and 2020 there were other measures of several tens of thousands of Euro.

In the three-year period 2020-2022, no tax penalties related to BU Domestic were paid in excess of 100,000 Euro.

**[GRI 2-27d]** For completeness of information, all proceedings concluded before the AGCM and AGCOM have been reported.

**[GRI 2-27a] [GRI 2-27b]** In BU Brazil, there were no complaints regarding privacy breaches and/or loss of customer data during 2022, according to local regulations.

In Brazil, the Data Protection Officer (DPO) has not become aware of any specific complaints related to privacy breaches and/or loss of customer data. In 2022 TIM S.A. received more than 600 inquiries from customers regarding holder rights. Among the requests for privacy rights received so far, the most frequent include:

- right of access;
- request for deletion of data;
- request for discontinuation of advertising messages.

## GRI: 2-28 Membership associations

**[GRI 2-28a]** ETSI (European Telecommunications Standards Institute): the main European standardization organization for telecommunications.

GSMA (Global System for Mobile Communications Association): of which TIM S.A. is also a member, an international association that brings together the major mobile phone operators and develops studies on the positive contribution of technology in reducing greenhouse gas emissions and achieving sustainable development goals.

Open-es: a system alliance that aims to survey the sustainability performance of its suppliers, strengthen the qualification process with market ESG standards, and build shared paths to growth.

JAC (Joint Audit Cooperation): TIM is among the founders of the international association of telecom operators that audits, evaluates and develops the implementation of sustainability in the supply chain of the information communication technology industry.

Ecorating: a consortium of international TLC operators that assesses the environmental impact of smartphones to help customers make sustainable choices and encourage suppliers to reduce the environmental impact of their devices.

Parks Free and Equal: an association that brings together employers to develop Diversity & Inclusion strategies and practices with a prevalent focus on the area related to sexual orientation and gender identity.

Valore D: an association of companies in Italy that has pioneered issues of gender equity and a culture of inclusion since 2009.



In addition, in Brazil, TIM S.A. has roles in the governance of:

ABR-[www.abrtelecom.com.br](http://www.abrtelecom.com.br)

Conexis-[www.conexis.org.br](http://www.conexis.org.br)

Telebrasil-[www.telebrasil.org.br](http://www.telebrasil.org.br)

ConectarAgro-[www.conectaragro.com.br](http://www.conectaragro.com.br)

## GRI: 2-29 Approach to stakeholder engagement

**[GRI 2-29a.i]** In 2022 the Domestic BU identified eight main categories of stakeholders with each of which different modes of engagement were employed:

1. TIM's People (employees) and Trade Unions
2. Financial Community
3. Customers
4. Industry business community
5. Bodies and Institutions
6. Suppliers and Business Partner
7. Community
8. Media

BU Domestic reviews the stakeholder list annually to keep up with organizational and market changes. In identifying and engaging stakeholders, TIM follows the AA1000SES global standard, the most widely applied standard in this area.

**[GRI 2-29a.ii]** As a Company that is strongly integrated in the territory and in the social and economic-productive fabric, the Domestic BU considers it essential to have a constant relationship with its stakeholders, that is, with all the people and organizations that are involved in various ways in the Company's activities. Through consultation, dialogue, information, and partnership activities, TIM has a way to keep its understanding of their expectations up-to-date and at the same time have a forward-looking view of possible scenario developments.

**[GRI 2-29a.iii]** The engagement standard used (AA1000SES), with a view to continuous improvement, involves a circular model that starts with defining the goals of engagement and arrives with translating what emerges from discussions with stakeholders into actions. Below are the main ways of involvement in BU domestic:

- Employees. Survey - on a voluntary basis - to the entire corporate population. Meetings with labor organizations. Intranet channel with over 16 million views. In 2022, 190 news items were published that generated 3,710 comments;
- Customers. Please refer to the information reported in the next page and the material topic "Customer Interaction and Service Transparency" in this report;
- Suppliers and Business Partners. The Vendors Hub portal where useful information and documentation to develop business opportunities and improve relationship effectiveness are featured. In addition, training activities on the Open-es platform have been organized in 2022 to stimulate the path to creating a sustainable supply chain;

- Local, national and supranational Institutions, the Regulatory Bodies and Supervisory Authorities. Meetings, participation in working tables, memorandum of understanding;
- Financial Community. Quarterly, the TIM Group presents key results and publishes related financial reports;
- Media. They are constantly informed about the Group's main economic and financial activities and results: in 2022, 300 press releases were issued in Italy and 285 in Brazil;
- Civil Community. Memorandum of understanding, working tables, surveys.

On the customer side, TIM confirms its strategy strongly oriented toward digitization and innovation, offering its digital caring channels dedicated to existing customers and prospects who receive personalized and fast responses.

In 2022 TIM handled about 276 thousand caring conversations between the public page and private messages on facebook and twitter, about 221 thousand alerts in the MyTIM private area, and handled about 4,2 million instant messaging conversations of which 83% were through the chatbot Angie and 17% with phone operator. In addition, through the whatsapp channel (human and bot) 390 thousand conversations were handled. In addition to the whatsapp channel, in 2022 deaf customers were also able to make use of the Pedius service, which allows access to TIM call centers, adding to the usual channels. The service,

which was launched in 2014, aims to ensure that inbound contact is accessible to hearing-impaired customers through an application that allows them to make normal phone calls using speech recognition and text-to-speech technologies.

TIM S.p.A. has adopted a model of presiding over and improving quality and customer experience (customer experience) with principals dedicated to the definition and evolution of customer journeys, to define improvement plans and give value to its customers.

Of particular importance among the surveys is the monitoring of the Customer Satisfaction Index (CSI)-based on the American Customer Satisfaction Index (ACSI) standard-which aims to survey the perceived quality of TIM customers and the customers of major competitors. Monitoring of the CSI has achieved certification of compliance with UNI 11098:2003 and is included in the managerial (Management By Objectives) and collective incentive system.

The indicator for 2022, for consumer customers is 75.02, up from 74.29 in 2021<sup>(6)</sup>.

See GRI Scope 3 of this report for issues related to Relations with Consumer Associations.

In Brazil, TIM S.A. orients its engagement and relationship actions with its key audiences based on the engagement policy, which provides a set of principles that seek to enhance dialogue and transparent communication in order to

<sup>(6)</sup> Figure updated based on base year revenues.

build quality, solid and ethical relationships. In constructing its ESG agenda and materiality matrix, TIM S.A. follows these guidelines to dialogue with its stakeholders. The annual process of preparing the materiality matrix includes consultation with the Company's external and internal stakeholders: this process enables the periodic review of TIM's ESG strategies in Brazil, for the continuous improvement of the Company's practices and commitments.

In 2022 TIM S.A. revised the materiality matrix in light of new trends that consider financial and social-environmental impacts (so-called dual materiality), in line with the Global Reporting Initiative's Universal Standards. With the support of a consulting firm specializing in this activity, the construction of the new matrix consisted of five stages:

- Definition: purpose, scope, and tools to be used;
- Identification: stakeholder mapping and issue list refinement;
- Priority setting: survey of socio-environmental and financial impact perspectives;
- Analysis: verification of results, development of materiality matrix and recommendations;
- Validation: approval of topics and recommendations by top management.

After defining the areas and identifying the stakeholders, the twenty themes were reported, six on the environmental axis, six on the social axis, and eight on governance.

In setting priorities, TIM S.A. has divided 3 areas:

- Assessment of socio-environmental impacts by conducting five interviews and five online consultations with external experts and a focus group with 12 TIM S.A. employees.
- Assessment of financial impacts through one-on-one interviews with six vice presidents of TIM S.A., one external specialist as well as online consultations with seven Company executives, eight financial market specialists and two TIM Italia representatives.
- Perception of relevance through 1,000 online consultations in which participants indicated their perceptions of the five topics most relevant to TIM; the consultations involved various stakeholders including: employees, customers, suppliers, startups, hubs, and participants in Instituto TIM projects.

All the results obtained were analyzed and the information gathered was validated with the Company's top management. At the end of the process, eight material themes were identified for the TIM S.A.

## GRI: 2-30 Collective bargaining agreements

**[GRI 2-30]** All, then 100%, of TIM Group workers are covered by collective bargaining agreements.

All workers are covered by collective bargaining agreements between the employer and labor organizations: all staff are guaranteed the opportunity to participate in Trade Union meetings, in terms of hours of paid leave and company space or computer tools that enable them to be held, as well as to participate freely in

consultations to elect union representatives. In none of the Group's operations is the right to Trade Union participation at risk or challenged. The framework, among other things, specifies how the rights are to be enjoyed and establishes the supervisory bodies for their enforcement.

**[GRI 2-30a]** 100% TIM Group.

**[GRI 2-30b]** The relevant collective bargaining agreement applies to all employees.

## GRI 3 - Material Topics

**GRI 3-1** | Process to determine material topics

**GRI 3-2** | List of material topics

**GRI 3-3** | Management of material topics

## Process to determine material topics

**[GRI 3-1a.i]** During 2022, in accordance with the latest provisions of the Global Reporting Initiative's international standards, TIM adopted the impact relevance criterion by assessing the actual or potential impact that the Group can generate for each topic on society and the surrounding environment.

The topics were preliminarily selected through an analytics platform that, in real time, collects and analyzes a substantial number of documentary sources from the industry and every organization relevant to our business and monitors major social media, ensuring a solid and up-to-date information base. An initial risk analysis was also carried out at this stage to ensure that no topics considered relevant by the risk management system in relation to ESG topics were missed.

For each theme, thus mapped, the impacts (negative or positive, actual or potential) that the Group may have on the economy, the surrounding environment, and people were identified by analyzing the Group's activities, its business relationships, and the possible effects generated or induced directly or indirectly.

Top management identified key stakeholders to initiate the general engagement activity used to assess impacts associated with potentially relevant topics.

Based on the Accountability AA100SES standard, top managers made a qualitative assessment of the relevance of the relationship with each stakeholder category in terms of “dependence,” “influence,” and “urgency” with a scale of values between 0 (not relevant) and 5 (extremely relevant).

**[GRI 3-1a.ii]** The analysis was conducted with the direct involvement of both stakeholders and TIM's top management, who were asked to assess the relevance to TIM of material issues based on impact.

External and internal stakeholders were engaged in order to ask them to give an impact assessment for each topic, using a qualitative measurement criterion with a scale of values between 0 (not impactful) and 5 (extremely impactful) to then qualify the topics, according to their relevance, into topics for which a position of excellence is required, topics for which targeted action is required on aspects that are peculiar and of interest to TIM, and topics to be observed constantly to assess possible evolutions.

Material topics were consolidated based on the appropriately weighted findings of document analysis, survey results, and listening to stakeholders through media channels. Finally, the material topics were also validated downstream of a sensitivity analysis that tested whether and how the materiality of the topics varied as the weights assigned to the sources used changed. Finally, it was verified that the identified material topics included the medium/high level risks overseen in risk management. The synthesis of the corporate vision and external stakeholders returned a list of topics in order of impact relevance.

**[GRI 3-1b]** A significant sample of representatives of all stakeholder categories and Group Top Management was involved in a survey designed to identify and measure the impacts associated with each topic. Responses from external stakeholders are appropriately weighted according to the category relevance expressed by Top Management.



The process was carried out in constant interaction with the corporate risk management function and the use of a constantly updated information base both in relation to documentary sources and in relation to the media as a source of listening to stakeholders.

## List of material topics

**[GRI 3-2a]** The 2022 materiality analysis resulted in the identification of 16 material topics. Below is the list of material issues sorted by impact relevance with evidence of the type and intensity of impact.

Material Topics 2022	Impact level	Type of impact
Privacy and cybersecurity		- Potential
Digital inclusion		+ Actual
Infrastructures and emerging technologies		+ Actual
Customer interaction and service transparency		+ Actual
Employee health and safety		- Actual
Development and motivation of TIM employees		+ Actual
Climate change		- Actual
Energy transition		+ Potential
Legal and regulatory context management		- Potential
Equal pay and opportunity		- Potential
Community and stakeholder relations		+ Actual
Resilience to physical, public health, and sociopolitical risks		+ Actual
Sustainable supply chain		+ Actual
Human rights defense		- Potential
Cyberbullying, child pornography, online gambling		- Potential
Circular economy and waste production		- Potential



**[GRI 3-2b]** In 2022 there were no substantial changes from the previous year although the update of the GRI Standards, which requires the analysis of topics in relation to their relevance of impact to the outside world, required a more detailed qualification of the topics, raising them from 12 in 2021 to 16 now. By way of example, we cite the 2021 topic “Work and human capital”, which in 2022 was declined into “Employee health and safety” and “Development and motivation of TIM employees”; likewise, “Circular economy and waste production” was spun off from the topic “Climate change”, which in 2021 connoted with broader meaning. Finally, the topic “Resilience to physical, public health and sociopolitical risks” is mentioned, which is not present in 2021 because it is considered cross-cutting on various topics, especially in relation to Covid-19 management.

## Management of material topics

### Privacy e cybersecurity

**[GRI 3-3a]** Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights

The disruption or vulnerability of TIM's information systems and networks due to security breaches, which could disrupt core activities or lead to the accidental or illegal access, destruction, alteration, or disclosure of protected data, can generate a negative impact on people's privacy and the cybersecurity of data and information.

**[GRI 3-3b]** Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships

The Organization could be involved in the negative impacts through its core activities.

**[GRI 3-3c]** Describe its policies or commitments regarding the material topic

Privacy compliance, cybersecurity protection, and related potential negative impacts are a priority for TIM.

Regarding the issue of privacy in particular, TIM has had an articulated Operating Model since 2003 to safeguard the correct application of data protection regulations at the Group level. With these intentions, the company functions are committed to ensuring the proper processing of the personal data of data subjects, including customers and employees, in the performance of business activities, in line with the provisions of the General Data Protection Regulation (GDPR) in Italy, and the General Data Protection Law (LGPD in the Portuguese acronym), as far as BU Brazil is concerned.

The transposition of legal provisions and guidance from the Privacy Guarantor is ensured by the Privacy Function through the constant study and interpretation of regulations and the subsequent updating of Group regulations and policies and procedures on specific areas. Particularly significant among these is the “System of rules for the enforcement of personal data protection legislation in the TIM Group” (System of Rules), which defines the provisions and operational guidelines for each fulfillment of interest.

In the area of information security, the Cyber Security Function ensures the security monitoring of the public telecommunication network, data centers and network, and manages ICT security incidents in conjunction with the relevant functions. With these aims in mind, the TIM Group has equipped itself with a comprehensive body of regulations consisting of Procedures and Policies on cybersecurity governance, monitoring, cybersecurity incident management and crisis management.

In addition, in order to go beyond the normal transposition of regulations in the management of privacy and information security topics and generate value in this regard, some functions and/or companies in the Group with a significant impact on stakeholders have achieved and/or confirmed certifications in line with the main ISO standards on the subject (ISO/IEC 20000-1, ISO/IEC 27001, ISO 27035).

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

As a function of the material theme Privacy and cybersecurity, TIM has committed to carrying out multiple actions inherent in preventing and mitigating the negative impacts associated with it. In this regard, BU Domestic has taken the following actions:

- adaptation of the Privacy Operating Model in line with the principle of privacy-by-design, which involved updating the Registers of processing activities,

creating a heat map based on the calculation of privacy risk associated with each processing operation, and introducing new IT tools, including the one for managing the Notifications and the one for managing the aforementioned Registers, which enable the integration of the information managed;

- Data Protection Officer (DPO) oversight activities useful for ensuring compliance with privacy regulations, which ensured both specialized advice and support to Corporate Functions / Group Companies for the proper handling of personal data in business processes through the significant specialized support provided by the Privacy Function in the drafting of contracts with customers and suppliers, and opinions on privacy impact assessments (PIAs), aimed at helping to assess the risk to the rights and freedoms of data subjects;
- actions necessary to respond to multiple customer requests, such as, for example, aimed at knowing TIM's personal information and exercising other privacy rights;
- actions necessary to give effect to the requests of the Privacy Guarantor;
- IT security incident management activities, in order to detect events that could lead to the cybersecurity breaches on ICT Assets, contain the possible relevant negative consequences, improve the overall security conditions, and re-establish the previously defined security levels, contributing to the review process of the Corporate Information Security Management System;
- research and innovation activities for cybersecurity and, more generally, for information and network security;

- implementation of evaluation and testing campaigns on innovative security solutions to increase the level of protection of corporate assets and expand the business offerings of the Domestic BU;
- implementation of multiple security testing campaigns with the goal of assessing the level and adequacy, from a security perspective, of new equipment, tools and devices;
- identification of several new vulnerabilities as part of testing, penetration testing and vulnerability assessment activities.

With reference to the Brazil BU, in order to support the Group's action on privacy and cybersecurity, in full compliance with the General Data Protection Law (LGPD) and the Sarbanes-Oxley Act, TIM has initiated a series of strategic initiatives:

- obtaining, in 2022, ISO 27001 certification, as within the Domestic BU;
- establishment of a Data Protection Officer (DPO) and Privacy Committee, coordinated by the CEO and with the participation of the company's directors;
- updating the company's privacy and cookie policies, including to guide employees' handling of personal data;
- adaptation of all new contracts and some contracts entered into prior to the introduction of the LGPD to include updating related to data protection, particularly for business partners;
- fulfillment of data subjects' requests for rights, including providing for the procurement of a digital tool for compliance and management of the same rights and the assignment of a compliance team, with the purpose of

conducting the necessary measures for compliance with the new law and management of data subjects' requests for rights;

- creation of an internal security flow for incidents or cases of personal data leakage;
- conducting cybersecurity risk analysis in order to mitigate vulnerabilities that could be used to access confidential information;
- provision of training courses of varying degrees to all staff, managers and strategic employees, and vendors, with the aim of disseminating the provisions of the LGPD and best practices in security and privacy.

**[GRI 3-3d.ii, d.iii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; / actions to manage actual and potential positive impacts**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the potential negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of

ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at dealing with actual negative spillovers or bring about positive economic, social and environmental impacts.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to keep track of the effectiveness of actions taken to prevent and mitigate potential negative impacts, the Group has developed a set of processes in line with the relevant major ISO standards (ISO/IEC 20000-1, ISO/IEC 27001, ISO 27035).

With reference to privacy, BU Domestic identifies a control system based on three different levels:

- periodic self-evaluation procedures;
- spot checks conducted by the relevant central and territorial functions based on defined procedures and methodologies;
- second-level controls, which are planned and identified by the DPO structure because of the level of risk inherent in the treatments.

In addition, following the review of telemarketing processes that took place during 2020 and 2021, the internal controls performed on these processes were strengthened and expanded, consistent with the requirements of the Privacy Guarantor.

With respect to IT security, in Italy, the Cyber Security Function conducts security monitoring of the public telecommunications network, data centers and

network, the process of which is part of a broader macro-process of “security event” management and takes into account the principles contained in the company's policies on information security, Business Continuity Management, Crisis Management and personal data breaches.

As for BU Brazil, in order to assess the effectiveness of its actions, through the Cyber Security Operations Center (CSOC) it conducts constant monitoring with reference to a number of necessary aspects such as those related to data loss prevention (DLP), multi-factor authentication (MFA), identity management and content filtering.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

TIM aims to spread knowledge about privacy compliance, promote compliance, and increase awareness and attention of personnel in charge of processing personal data. This is the background against which the relevant training activities are framed. In particular, with reference to the Domestic BU, training sessions were organized in 2022 by the Privacy Function on the subject of processing requests related to access to traffic data stored for criminal purposes (following the regulatory change in late 2021 of article 132 of the Privacy Code) and commercial contacting, i.e., related to the subject of contacts for commercial purposes. With respect to BU Brazil, on the other hand, a training offering has been defined on the contents of the LGPD and the reference measures to be taken in the areas of privacy and cybersecurity. In addition, in order to track the effectiveness of its actions, the Domestic BU voluntarily monitors a number of specific indicators in this regard from year to year, outlined below:

- requests received from the Privacy Guarantor;
- responses to requests to exercise customer privacy rights addressed to TIM Customer Care or directly to the DPO;
- data breach characterized by loss of customer data.

Finally, for the Brazil BU, indicators are also monitored regarding the requests received regarding the processing of data subjects' data and the number of legal actions conducted by clients during the year.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

During 2022, fulfilling its training activities, the Domestic BU implemented training initiatives on privacy and cybersecurity issues, impacting 801 people for a total of 10,424 hours delivered, respectively, with respect to privacy-related notions, and 32,770 people for a total of 125,260 hours of training delivered, with respect to cybersecurity issues.

The training activities held by the Domestic BU in relation to issues related to commercial contactability covered more specifically the general requirements of the GDPR and the rules and instructions defined by TIM in accordance with the current regulations on commercial contactability, the processing of customer/prospect requests<sup>(1)</sup> related to the exercise of privacy rights and the detection and management of data breaches.

Regarding training initiatives conducted by the Brazil BU, 100% of employees (in 2022 amounting to 9,395) were involved in order to raise their awareness with respect to data protection and cybersecurity issues.

In relation to the annual monitoring of the indicators adopted by the Domestic BU, the effectiveness of the actions taken is demonstrated, for example, in the effective management of cybersecurity incidents involving the Domestic BU's TIM systems. In this regard, 3 incidents generated low impact, only 1 incident generated medium/high impact; all other incidents were contained/mitigated by the countermeasures in place.

Compared to the monitoring conducted by BU Brazil, 2022 shows a decrease of more than 14% (vs 2021) with reference to requests received related to the processing of data subjects' data.

Finally, further evidence of the effectiveness of the initiatives undertaken by the Group in this regard lies in the fact that some Functions and/or Companies of the Group with a significant impact on stakeholders have obtained certifications in line with the main ISO standards on the subject (ISO/IEC 20000-1, ISO/IEC 27001, ISO 27035).

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

TIM's efforts during 2022 on the ongoing application of the principles and policies governing the identified topic, and the related impact, has resulted in continuous improvement of the Group's privacy and information security management system.

<sup>(1)</sup> A prospect is a person who falls within the company's target audience of potential customers; in essence, he or she is a "candidate" who may possibly or likely turn into a customer.



In this regard, the monitoring activities conducted by the Group during 2022 made it possible to capture any critical aspects while enabling the Company to carry out assessments and actions with positive impact on its processes. In fact, the countermeasures put in place in order to prevent or mitigate any negative impacts related to the topic, allowed during 2022 to contain/mitigate 99.9% of cybersecurity incidents involving TIM systems in the Domestic BU.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The materiality analysis conducted in 2022 highlighted the extreme importance of this topic, consequently guiding the Group toward carrying out initiatives and identifying necessary safeguards for policy implementation with a higher degree of commitment and accountability.

With this in mind, during FY2022 the Domestic BU took part in several additional discussions with its stakeholders aimed at implementing privacy and information and network security policies, while also activating virtuous channels for cybersecurity research and innovation. With reference to the engagement activities instrumental to research in the field of e-security, the following are relevant, for example:

- membership in the new Telecommunication Information Sharing and Analysis Center (T-ISAC), which confidentially collects and disseminates information and recommendations on security incidents within the mobile community;
- participation in the work of the Coordinated Vulnerability Disclosure Subgroup

(CVD) to share information on new vulnerabilities and threats to mobile networks;

- the activities under 3GPP SA3, i.e., of the 3GPP-specified Systems Security and Privacy working group;
- chairing the security working group of the O-RAN ALLIANCE, an international alliance aimed at transforming and innovating mobile access networks;
- the continuation of active research collaborations with the Politecnico di Milano as part of 2 separate TIM-funded Ph.D.s, respectively, on the topics of malware and security analysis on equipment and devices; and the funding of a new Ph.D., to study the use of Natural Language Processing (NLP) technologies in the automatic processing of Cyber Threat Intelligence reports and the extraction of data of interest.

## Digital inclusion

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM can generate impacts by contributing to the development and deployment of useful technologies to bridge the digital divide, facilitating or providing digital hardware, software, content and service solutions to communities and individuals who lack them, and supporting the development of skills needed for effective use of technologies.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and implementing initiatives to manage potential and actual negative economic, social and environmental impacts.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The Group's strategy is embodied in multiple actions and commitments aimed at spreading an inclusive digital culture that can enable innovation and socio-economic development of communities. In particular, the Group's activities in the ICT sector, thanks to its coverage with broadband and its mobile network, offer the potential to ensure everyone's participation in digital evolutions, guaranteeing the overcoming of the digital divide through the definition of technological solutions and thematic initiatives that contribute to the determination of a

future that takes into account everyone's capabilities. With these aims in mind, the Domestic BU supported and endorsed the European Commission's proposal to adopt the Pathway to the digital decade, which can set concrete goals and targets for digital transformation in Europe to 2030, empowering businesses and citizens for a people-centered, sustainable and more prosperous digital future.

In addition, the Group is a member of the Telecom Infra Project (TIP), whose international initiative aims to develop innovative and sustainable solutions to expand telecommunications infrastructure around the world. As part of the same project, TIM has contributed to the development of open telecommunications solutions such as OOPT (Open Optical Packet Transport), DCSG (Disaggregated Cell Site Gateway), OpenRAN (Open Radio Access Network) and more recently TSS (Total Site Solution) and Open Field Program for 5G.

In continuation of previous years, BU Domestic is an active member of the Digital Skills and Jobs Coalition, a platform launched by the European Commission for the exchange of best practices in the field of digital skills, with the participation of multiple stakeholders at the European level.

Finally, in Italy TIM is committed to promoting digital culture in the country through specific practices that can train and/or increase the digital skills (upskilling and reskilling) of students, teachers and workers, with the aim of ensuring greater social inclusion and gender equality. Efforts to promote knowledge acquisition and exchange with universities are also carried out by the Group in Brazil through its open innovation program.

**[GRI 3-3d]** Describe actions taken to manage the topic and related impacts, including:

**[GRI 3-3d.i, d.ii]** actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;

(See point b)

**[GRI 3-3d.iii]** actions to manage actual and potential positive impacts

The Group is constantly engaged in defining actions to highlight, affirm and foster its commitment to digital inclusion, with the aim of managing the actual positive impacts associated with the topic of digital inclusion.

The following are the main actions carried out for this purpose:

- activation, at the Group level, of specialized projects aimed at the community of university students aimed at promoting the development of an ecosystem in which companies and academia can contribute to the achievement of the objectives of university attractiveness, company competitiveness, graduate employability, and the economic and social growth of territories - such as, for example, the TIM Academies active since 2020 with the main Italian Universities and the Roadshow at Universities activated in Brazil in 2022;
- BU Domestic's signing of the EU Skills Pact, an initiative launched by the EU Commission aimed at fostering partnerships with all stakeholders interested in implementing concrete actions to improve skills and retrain people of working age;

- subscription to DUFA (Digital Upskilling for All) by BU Domestic, a European project aimed at promoting best practices in digitally upskilling the workforce and empowering them to meet the challenges of gender, aging and diversity;
- membership in Italy in the European project "Digital Volunteers Program," which includes a commitment to accompanying SMEs on their digital transformation journey by providing specialized mentorship on the use of new technologies;
- development by the Domestic BU of high-tech immersive initiatives as part of major cultural events, including through constant guidance in the use of any technological supports adopted;
- search for flexible rural connectivity solutions in Brazil, through, for example, the partnership entered into in 2022 with Engie in order to implement a public lighting management solution for the city of Petrolina.

**[GRI 3-3e]** Report the following information about tracking the effectiveness of the actions taken:

**[GRI 3-3e.i]** processes used to track the effectiveness of the actions;

In relation to commitments and actions aimed at managing the actual positive impacts associated with the topic, the TIM Group constantly monitors their effectiveness throughout the year by adopting specific processes that take into consideration the recorded performance on digital inclusion.

In relation to the Domestic BU, all projects and actions undertaken are subject to a monitoring system capable of measuring in qualitative and quantitative terms

the feedback obtained. For example, with reference to the initiatives conducted with students, the monitoring process adopted by TIM in Italy takes the form of a system defined on the basis of the findings of entrance tests, learning tests and motivational interviews, aimed at measuring how much the training has contributed to closing the skills gap in the digital sphere.

In addition, for the different outreach and training initiatives, the Domestic BU tracks the effectiveness of the actions by measuring participation in the projects implemented and identifying the perceived quality of the users of the projects. In fact, to measure the latter, at the end of each action, BU Domestic first defined and then administered a satisfaction questionnaire.

Finally, in both the Italian and Brazilian territories, the Group conducts annual monitoring processes aimed at analyzing and verifying the degree of coverage of its network, with the aim of progressively expanding it in line with the objectives assumed in this regard as part of its 2023-2025 Business Plan.

#### **[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

The TIM Group has defined specific goals and indicators for monitoring them, which can quantify the effectiveness of the commitments and actions implemented associated with the active management of actual positive impacts on digital inclusion.

In particular, the Group has set ambitious goals inherent in the development of its ultra-broadband network on FTTH (Fiber To The Home) architecture-monitored on an ongoing basis, with the aim of bringing high-speed connectivity services

over fiber to most of the territories in which it operates, contributing to geographic digital inclusion:

- in Italy, TIM has the ambition to achieve FTTH coverage of 48% of the country's housing units by 2025.
- in Brazil, TIM has the ambition to achieve FTTH coverage of 4.8 (homes passed) by 2023.

In addition, with reference to the implemented projects aimed at the community of high school students and teachers, as well as the community of university students, the Domestic BU monitors the indicators of participation, which capable of determining the rate of increase/decrease of participation in the relevant initiatives, and of passing the learning tests, as well as the number of contacts and the results of the satisfaction questionnaires.

Finally, the Domestic BU has defined additional indicators capable of detecting, monitoring and ascertaining the results and progress achieved with respect to the initiatives activated as part of the cultural and musical events in which TIM took part and with respect to the initiatives implemented in collaboration with schools, monitoring, respectively, for example, the number of events manned and the indicators related to the involvement of schools in the Italian territory.

#### **[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions implemented by the TIM Group on digital inclusion is demonstrated, first and foremost, through the progress achieved against its digital inclusion targets:

- with reference to the Domestic BU, FTTH coverage of 32% of the country's housing units was achieved in 2022.
- regarding BU Brazil, FTTH coverage >4 (homes passed) was achieved in 2022.

With reference to the additional main indicators monitored, with respect to the indicators of participation and passing the learning tests, BU Domestic noted on the one hand a 2% year-on-year increase in participation in the projects implemented for the community of high school students and teachers and for the community of college students, and on the other hand it noted the efficiency of the same initiatives by noting a passing rate of more than 50% of the learning tests.

In contrast, with regard to the indicators monitored by TIM in Italy to measure the level of satisfaction with projects and the number of contacts from companies to university student users, in 2022 the Company found respectively on a scale of 1 to 5 a score of  $\geq 3$  in the questionnaires disbursed, as well as a 2% year-on-year increase in students contacted by companies operating in the market.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

The initiatives carried out by the Group and the important results achieved during the year, contribute to the digital growth of the territories and at the same time increase TIM's awareness of the crucial role assumed by the Organization in the pursuit of national and supranational goals of digital inclusion.

In fact, through its business, the Group contributes to the digital inclusion and growth of the territories in which it operates, learning useful insights from the performance of daily activities and engaging in a path of continuous improvement for the deployment of ultrafast connectivity, accessible and secure digital services for daily life and business, the strengthening of citizens' digital skills and the development of their technical and professional skills. In this light, the realization that one's digital expertise is an essential tool for the personal, social and professional development of the citizens and workers living in the communities where TIM is present underscores the importance attached to the topic and the commitment shown on these aspects, and qualifies as the most important lesson learned from the operational practices conducted. In this sense, only through a widespread and shared culture on digital skills, supported by the Group's actions, can the current and future challenges of sustainable development and, in particular, of breaking down social and geographic digital barriers be addressed.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The TIM Group carries on an ongoing dialogue with different stakeholders in order to develop virtuous initiatives aimed at positively impacting the spread of digital skills and overcoming all forms of social and geographical barriers in this regard. Such confrontation is crucial for the Group to pursue its goals, and identify instances of them.

With this in mind, during the year the Domestic BU carried out a continuous engagement capable of conveying the improvement of the effectiveness of its implemented initiatives, some of which by nature arise from the interaction with external partners; in fact, precisely through such engagement in the constant confrontation between the parties, TIM was able to initiate, develop and actively contribute to the implementation of the planned digital inclusion projects, ensuring positive spillovers associated with the theme.

### Infrastructures and emerging technologies

#### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM can generate impacts through the development of digital technologies such as robotics, IoT and artificial intelligence, thanks in part to the enablement of innovative infrastructure such as fiber and 5G, which transform business operations and contribute to the redefinition of the services market and the growth of innovation.

#### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was

provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and implementing initiatives to manage potential and actual negative economic, social and environmental impacts.

#### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group attaches strategic importance to the issue of investments aimed at upgrading infrastructure and adopting cutting-edge technologies in line with industry trends. Research and development of innovative infrastructure and emerging technologies, processes and business models is a key factor in keeping pace with the profound transformations of ICT, as well as a necessary and driving asset for the customers with whom the Group works, contributing to overcoming the socio-cultural barriers that limit the possibility of participating in the information society and enjoying its benefits.

The Group's technological evolution is based on the TIM Technology Plan, part of the Industrial Plan; in particular, the Technology Plan identifies the technology strategy in terms of guidelines, specific technologies, and adoption roadmaps over a multi-year period. The three-year technology plan is the reference document for the Group and also includes the technology development plans of

subsidiaries. Qualitative and/or quantitative objectives are declined on an annual basis and defined in such a way as to be objectively measurable in compliance with the standards of the quality (ISO 9001), environmental (ISO 14001) and innovation operational processes; in general, TIM's processes are based on the eTom reference standard of the Telemanagement Forum<sup>(2)</sup>.

In 2022, the Domestic BU continued to strengthen an innovation model that leverages the ecosystem concept, which is key to nurturing a virtuous circle for scouting, incubating, and planning innovative initiatives. This is realized, on the one hand, through labs as multi-site centers that are virtually open and connected in a single digital environment and, on the other hand, through collaboration with a number of Universities of excellence.

With this in mind, during the year the Domestic BU undertook specific engagements with the aim of giving relevance to the identified impact topic and, implicitly, to support innovation and in creating a synergy geared toward the company's digital transformation, which attests to TIM as a partner of reference in Italy.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

**[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

With reference to the efforts deployed in Italy by TIM according to topics related to infrastructure and emerging technologies, the Domestic BU has carried out multiple actions with the aim of attesting, fostering and managing the actual related positive impacts.

In particular, the Domestic BU introduced two new projects during 2022:

- implementation of the “Progetto Polveri Sottili” (Thin Dust Project), within the CTE Next project, already undertaken over the past few years with the City of Turin, together with other stakeholders including the Polytechnic University of TO, through which TIM is designing a solution aimed at the collection, dissemination and analysis of environmental pollution data through the measurement of the concentration of fine particles in the air;
- development of a smart mobility enabling platform in collaboration with Google Cloud on TIM's Edge Cloud 5G technology, which will make possible the development of new applications dedicated to connected cars and smart transportation.

<sup>(2)</sup> The Business Process Framework (eTOM) can be considered an operating model framework for telecommunications service providers; the model describes the required business processes, defines key elements and how they should interact. eTOM is a standard maintained by the TM Forum, an association for service providers and their suppliers in the telecommunications and entertainment industries.



In relation to the “Progetto Polveri Sottili”, TIM conducted the following actions in 2022:

- design of the solution in the CTE framework, developed with the understanding that it succeeds in supporting the City of Turin in its activities to implement policies to mitigate dust pollution, determined by vehicular traffic, through cross-data analysis of particulate matter and traffic flows, and aimed at supporting new city mobility management policies;
- architecture definition, jointly with other partners, and development of TIM platform modules for certification of the source of data received via 5G connectivity (via IoT Blockchain Gateway);
- development of TIM platform modules for scenario building to support policy choices, with a view to supporting the implementation of road interventions, such as analyses of the different environmental impact of using traffic circles versus traffic light intersections or the location of new bike lanes.

On the other hand, with reference to the first platform in Italy enabling smart mobility on TIM's Edge Cloud 5G technology, the Company has committed to carry out relevant actions in order to ensure the implementation and management of its associated actual positive impacts. Details of the main actions carried out are given below:

- defining the platform aimed at managing smarter mobility through the use of Artificial Intelligence (AI). Through these mechanisms, the platform developed by BU Domestic will influence and optimize vehicle routes and mobility in general, decreasing time and improving traffic patterns with positive impacts from a sustainability perspective;

- definition of edge computing that can offer the opportunity to process data more efficiently, close to the places of origin, reducing the amount of data transferred to centralized data centers and leading to a potential reduction in energy consumption and CO<sub>2</sub> emissions associated with the transmission of data to the centralized data centers themselves;
- local mobility management, thanks to the integration with applications provided by MASA (Modena Automotive Smart Area) partners, and TIM's technology, according to the implementation of an Edge Computing infrastructure.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In defining the processes used in order to monitor the effectiveness of the actions referable to the “Progetto Polveri Sottili”, TIM identified a joint process between ARPA (Regional Agency for Environmental Protection of Piedmont) and the Polytechnic University of Turin (POLITO) with a view to comparing the data collected by POLITO's sensor system with those collected by ARPA's fixed stations.

The process of monitoring the effectiveness of actions related to the smart mobility enabling platform, launched in 2022 by TIM and Google Cloud, on the other hand, is inherent within the system itself and in the actions conducted by the Domestic BU, aimed at highlighting the positive impact generated by the project.

In this regard, the monitoring process through which to verify the effectiveness of the implementation of the first Edge Computing solution lies in the development of the platform itself. In fact, the latter will allow MASA and the University of Modena and Reggio Emilia to test new solutions for self-driving and assisted cars as well as advanced cloud mobility applications, which require dynamic and ultra-secure communication between vehicles and road infrastructure and integration with smart city systems.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In relation to the actions taken in 2022 by TIM in Italy in order to generate positive impacts in terms of infrastructure and emerging technologies, the Company has pursued specific annual goals in the implementation of its projects, monitoring the progress achieved.

In particular, as part of the effort to identify innovative technological solutions for the management of environmental aspects, 2022 saw the birth of the “Progetto Polveri Sottili” - scheduling its full implementation in 2023, for which, as it is still in an experimental phase, the Domestic BU sought to pursue the Proof of Concept (PoC) goal, which is to validate the Blockchain-based E2E technology solution. Since this is, therefore, a solution aimed at the dissemination and data analysis of environmental pollution by measuring the concentration of fine particulate matter in the air, the type of sensors proposed by the Polytechnic and the overall system chain were subject to monitoring and validation, aiming to make the solution easily replicable especially in urban settings.

With respect to smart mobility technology solutions, in 2022 the Domestic BU

has set a target to build a platform enabling smart mobility on TIM's Edge Cloud 5G technology, with the aim of making it, according to its own development, a scalable and replicable solution to make its large-scale deployment manageable and ensure the sustainability of the Edge Computing platform.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The progress made in 2022 by the Domestic BU against its goals and targets, respectively, for the two different projects pursued during the fiscal year highlighted the capacity and importance attached to the material topic by TIM.

The effectiveness of the actions taken by the Domestic BU to manage the positive impacts generated and its objectives, in this case the “Progetto Polveri Sottili”, is demonstrated by the maturity achieved with respect to the development of the defined system, which has the capacity to enable new city mobility management policies, through the post-processing processes of the collected data related to the concentration of fine particles in the air. Specifically, both the methodological approach and the E2E technology solution were validated in 2022.

With reference to smart mobility solutions, in 2022 in Italy TIM in partnership with Google Cloud launched the platform for smart mobility enablement on Edge Cloud 5G technology, achieving its goal of making the platform a solution, in technological terms, scalable and replicable. In fact, the expertise employed in the design of Edge's infrastructure allowed the technology to be deployed according to these ambitions.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

The projects identified and the progress achieved with respect to them have enabled the Group to strengthen its awareness of the importance, for realities such as TIM's, of envisaging continued investment in smart, high-innovation solutions, with a view to looking forward.

With reference to 2022, while on the one hand the Domestic BU was able to follow up on its commitment to updating and gaining experience in the field inherent to environmental monitoring by adopting innovative technologies, such as Blockchain, for the certification of collected data ("Progetto Polveri Sottili"), on the other hand it was able to define a solution capable of enabling the creation of an ecosystem of actors and partners for the realization of Edge Cloud-enabled automotive applications and use cases (smart mobility platform).

In fact, it is understood that for TIM, the continuous updating of the solutions developed and the deployment of considerable effort in these areas, turns out to be a necessary condition in order to proactively manage the actual positive impacts associated with the topic itself.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The development of the actions taken during 2022 in the area of infrastructure

and emerging technologies by the Group showed the important role of continuous discussion with stakeholders in achieving the set goals.

In fact, through constant discussion with them, TIM in Italy has been able to follow up on its own initiatives and at the same time has been able to develop important synergies; suffice it to think of the remarkable progress and goals that the Domestic BU has achieved and targeted both in the "Progetto Polveri Sottili" and in the development of the smart mobility platform. All made possible thanks to the continuous discussion with stakeholders and the development of collaborations between TIM, Turin Polytechnic, LINKS Foundation, CSI, UNITO, 5T, Arpa and the City of Turin in the context of the "Progetto Polveri Sottili", as well as the cooperations between the Domestic BU and MASA, with particular reference to the University of Modena and Reggio Emilia, regarding the deployment of smart mobility solutions on Edge Cloud 5G infrastructure.

## Customer interaction and service transparency

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

The way TIM relates to and communicates with its customers - in terms of listening to their needs, offering quality services, resolving disputes, and providing clear and transparent information during commercial transactions - as well as

the way it promotes the most sustainable patterns of consumption and access to products and services without discrimination can have an impact on their level of satisfaction.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at managing potential and actual negative economic, social and environmental impacts.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

In the current business environment and consistent with corporate strategy, the entire Organization is focused on improving the customer experience, increasingly a central lever to compete and gain market leadership.

In Italy, TIM is constantly committed both to improving quality and regulatory

compliance standards with regard to all contractual materials and advertising communication of the services offered to consumers, and to adopting a model of presiding over and improving quality and customer experience with specific garrisons dedicated to the definition and evolution of customer journeys in the logic of “quality by design”, providing for the effective management of disputes as well. Transparency, simplicity and respect for the customer are foundational elements in delivering an excellent customer experience.

In addition, in order to better focus on customer needs, within the Group it defines technology and skills practices formed for homogeneous business strands: cloud (Noovle), IoT/digital Identity (Olivetti-Trust Technologies), Cybersecurity (Telsy). In doing so, TIM Enterprise ensures uniformity of access and delivery of service quality to all wallet customers by offering the ability to negotiate and customize solutions and contract standards. At the same time, in Italy TIM is also committed to guaranteeing specific Service Levels defined at the contractual level as well as providing monitoring and support services.

Finally, in relation to this topic, in order to ensure effective management of related impacts, some functions and/or companies in the Group with a significant impact on stakeholders have achieved and/or confirmed certifications in line with the main relevant ISO standards such as ISO 9001 and ISO 22301, as well as ISO 14001, ISO/IEC 20000-1, and ISO/IEC 27001.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

**[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

In Italy, TIM has implemented a series of interventions aimed at managing actual positive impacts, targeting both Small Business and Consumer customers. The main actions in the area are given below:

- updating customer communications that are more complete, consistent, immediately traceable to the Company, and homogeneous in style and layout;
- introducing initiatives to facilitate interaction between Small Business and TIM customers through digital channels, enhancing self-caring features and without eliminating human touch. Similarly, with reference to the TIM website, the Brazil BU developed a new keyboard navigation experience that complies with the Web Content Accessibility Guidelines (WCAG) accessibility standards, improving the loading times of the most visited pages in order to intensify the user experience and facilitate access to Portal content in search engines;
- completion of self features on the dedicated customer app within digital caring initiatives. With respect to the topic of the dedicated customer app, important evolutions were also introduced by the Brazil BU, through the

adoption of new operational controls, a new testing process to become more stable, the introduction of new features, and a new approach to increase the app's popularity on app stores;

- centralized management of communications sent via sms and/or e-mail and introduction of the new Twitter channel “TIM4UAngie”;
- cadenced definition of Small customers' bill, expressed monthly and in line with the bill of Consumer customers, consistent with the offer communication and contract signing;
- introduction of an ongoing activity to revise the way of displaying the fee of the first bill for Consumer customers, with the aim of making the reading clearer and more transparent;
- continuation of caring campaigns aimed at Small Business customers to handle any administrative problems manifested by them, in order to prevent dissatisfaction upon receipt of the invoice;
- expansion of the “TIM UNICA” offer, in order to provide Consumer customers with a complete offer capable of covering every need, as well as creation of the new offer portfolio “TIM WIFI POWER” and “TIM 5G POWER” with the aim of guaranteeing the best data connectivity and dedicated support.

In addition, the Domestic BU has put in place a number of additional actions with a positive impact on customers, the main ones of which are listed below:

- update to the customer of diagnosis/restoration activities with notification of the expected resolution;
- initiation of the Crisis Team with possible participation of the client to manage the most critical cases;

- introduction of the possibility of returning the modem in case of termination earlier than the maturity of the installments of the modem;
- given direction to the Commercial and Communications Functions on the texts and graphic representation of promotional material related to the Premium, Executive and Magnifica offers, adapting such material to the commitments made by TIM to the Competition and Market Authority (AGCM) in the PS12231 proceeding;
- introduction of a series of awareness campaigns that accompany customers through the different stages of the customer journey and their relationship with TIM;
- collaboration and dialogue with the Consumer's Forum Associations and definition of memoranda of understanding aimed at strengthening the relationship of trust with Consumer Associations and renewing the relationship between TIM and its customers in terms of increasing transparency, clarity and completeness of information on services offered, commercial novelties, technological innovations and market developments (e.g., Adiconsum, Adoc, Cittadinanzattiva APS, Codacons, Federconsumatori and Udicon);
- revising the litigation management model with Consumer Associations, enhancing the development of a new process aimed at speeding up dispute resolution and preventing subsequent conciliatory actions.

Finally, with the aim of responding to the increasing sensitivity of certain customer segments, in 2022 the Domestic BU also confirmed its focus on promoting more sustainable consumption models; in fact, TIM pursued the sale of remanufactured

smartphones, exclusively Class A+, minimizing accessories and packaging materials and introducing the use of recycled plastics. At the same time, the Domestic BU completed the switch off of the 3G network, allowing it to focus its investments on 4G and 5G technologies, which are more energy efficient and perform better in terms of the quality of services offered to its customers.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to keep track of the effectiveness of the actions taken to positively impact its customers, the Domestic BU has developed a set of processes in line with the main relevant ISO standards (ISO 9001, ISO/IEC 20000-1, ISO 22301), as has the Brazil BU (ISO 9001).

In particular, in Italy TIM is able to deliver high levels of service by having structured internal process controls and adopting solutions that have undergone a multitude of certifications:

- ISO 9001 (also impacting BU Brazil) and ISO/IEC 20000-1 certifications for quality control of processes and services provided;
- Periodic checks on sensitive processes (L.262 and MOG 231);
- with a view to Business Continuity, where necessary, Business Continuity Plans (BCPs) are implemented with subsequent ISO 22301 certification by an accredited external body.

In addition, in order to monitor the effective implementation of the planned interventions during 2022, in Italy TIM has drafted and shared a customer experience improvement plan dedicated to Small customers with a focus on the segments to be garrisoned.

The Domestic BU, in line with previous exercises, has developed an extensive listening system capable of surveying the customer experience at different “moments of truth” of customer journeys and at different touch points. Among the processes, of particular importance is the one related to the monitoring of the Customer Satisfaction Index (CSI) - based on the American Customer Satisfaction Index (ACSI) standard - which aims to detect the quality perceived by TIM customers and customers of major competitors in different customer journeys and touch points. CSI's monitoring has achieved certification of compliance with the UNI 11098:2003 standard.

With respect to the processes adopted in order to ensure customer listening, which is instrumental in monitoring the effectiveness of the actions taken, the Brazil BU conducts two types of customer satisfaction surveys:

- the survey regarding consumer customers, own customers, and competitors' customers - conducted monthly, with data consolidation every quarter - which measures customers' experience, Net promoter Score, and overall satisfaction with the Company and its touchpoints;
- the Call Center Transactional Survey, the main channel for call center surveys as it covers all customer contact activities (front end). It is a transactional

survey because customers who contact TIM's call center evaluate immediately after “contact”, via IVR (Interactive Voice Response) or SMS.

#### **[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

To measure the effectiveness and progress of the actions taken, the TIM Group has defined specific indicators. Specifically, BU Domestic adopted the Customer Satisfaction Index, an indicator used in the managerial (Management By Objectives) and collective incentive system, setting a target for 2022 on the IVQ exit value of 75,63.

In addition, in relation to its services, the Company in Italy has adopted KPIs of infrastructure availability and service request support as well as standard indicators, monitored on a customer basis. In this regard, both the main KPI aimed at assessing infrastructure energy efficiency, Power Usage Effectiveness (PUE), was adopted, setting progressive containment targets, and a set of additional KPIs, of which the main ones are represented below:

- overall service availability, expressed as the percentage value of the Customer's network availability;
- restoration time, i.e., the time between the opening of the ticket related to the reporting/detection of the disservice, by the Customer and the restoration of the service (ticket closure);
- response time, the time between the reporting of the inefficiency, by the Customer (ticket opening), and the communication by Telecom Italia to the Customer of the outline diagnosis and restoration forecast;



- repetitiveness, that is, the number of occurrences of the same malfunction on the same SAP during the observation period.

In line with previous years and referring to litigation management activities, in Italy TIM has adopted specific indicators that decry the degree of transparency with which the Domestic BU communicates the channel for filing complaints to its customers.

As for BU Brazil, the Company monitors a number of effectiveness indicators, such as the average consumer customer satisfaction index, the average mobile consumer customer satisfaction index, the average mobile business customer satisfaction index, and the number of complaints received, in addition to the customer conversion rate.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

In 2022, the Domestic BU highlighted the effectiveness of its actions taken, highlighting on the Small customer segment an improvement in the CSI, as well as the following findings within the customer experience KPIs:

- increased satisfaction with billing and containment of billing complaints;
- decreased reporting rate for technical disservices on Fiber;
- improving the time for resolving technical disruptions.

The CSI value for the year 2022 achieved by the Domestic BU for Consumer customers is 75.01 (vs 74.29 in 2021 - updated figure based on the base year's

revenues); by doing so, the Company was able to maintain a stable performance in the current fiscal year. CSI improvement targets were also set for 2022 on the Small and Medium Business segment, which were fully achieved.

With reference to customer satisfaction indicators monitored by the Brazil BU, an improvement in the average consumer customer satisfaction index was noted in 2022. The remaining monitored satisfaction indicators remained largely unchanged. Compared with the customer conversion rate under the activation portal, in 2022 (January to October) this increased by 400%.

In relation, however, to actions taken to improve the energy efficiency of Data Centers within its services, TIM in Italy recorded an average PUE of 1.54, noting levels of absolute excellence in relation to current market standards.

With regard to litigation management activities with Consumer Associations and the Authority, the Domestic BU improved during 2022 the transparency with which it communicates the channel for filing complaints to customers. In 2022 in Italy TIM showed 10,455 Claims and Joint Conciliation cases with a percentage of positive agreements for the customer of 97.4% (vs 96.9% of Joint Conciliation applications discussed in 2021) and 39,168 cases at Co.Re.Com with a percentage of positive agreements for the customer of 89.3% (vs 88.7% in 2021).

On these issues, in Brazil, according to official SINDEC data, TIM S.A. emerges as the economic group with the lowest number of complaints in PROCONS (which are part of SINDEC), maintaining the fifth position in the complaints ranking for the third consecutive year. In this regard, 2022 saw a major decrease of about 34% (January-November 2022 data) in the number of complaints received (vs 2021).

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

Realizing that an excellent customer experience increases loyalty, enhances the perceived value of the brand, attracts new customers and is increasingly a central lever to compete and gain market leadership, TIM during the year has continuously carried out initiatives and actions that will allow the Group to ensure a path of continuous improvement with respect to customer experience indicators.

In fact, as a function of its profound commitment aimed at enhancing the customer experience, the Domestic BU has strengthened the omnichannel logic by including in the “offer profile” (Pdo) of Consumer customers the paragraph “Channels and modes of communication to the customer.” At the same time, consistent with the above, on the processes most significant to the Small customer experience, TIM has established cross-functional working groups in Italy with the goal of ensuring the best E2E quality, service level trends, and sharing of continuous improvement initiatives and best practices. At the same time, the insights that emerged in carrying out the activities led the Brazil BU to carry out improvement interventions with respect to its digital channels (e.g., website and dedicated apps), with the aim of initiating the development of a new version of the My TIM App, with new technologies, functions and features to improve the customer experience.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

With regard to the issue in question, during the year the Group initiated various projects and initiatives in order to follow up on an ongoing discussion with its stakeholders, as it is aware of the importance assumed by these moments in the monitoring and management of the positive impacts associated with the issue itself. In this regard, in Italy, the Operator Listening Project has enabled active involvement by caring operators in identifying possible actions to improve customer satisfaction and the daily activities of operators. In addition, to support the creation or modification of offers/processes, the Domestic BU made use of the “the Lighthouse” community for the Consumer segment, which features internal experimenters who are engaged to live the customer experience at all stages of the customer journey.

In addition, the Domestic BU, in response to the needs of its stakeholders (customers, institutions, investors, etc.), has been equipped with certifications and attestations that aim to keep operational processes under control and guarantee the services provided. In this way, TIM Enterprise - operating under the Domestic BU - is able to assure its stakeholders that the stated goals of ICT infrastructure resilience, availability and efficiency are real and verifiable. These needs are made explicit by stakeholders through various ways, such as, for example, in the context of calls for tenders.

Finally, on the issue of joint conciliation, a topic for which TIM chaired an event at CNEL in 2022 sponsored by Consumer's Forum, was released a new interface

platform with Consumer Associations, the MIRART AC, a platform that facilitated the relationship and simplified the management of the process through the possibility of monitoring with more transparency the data of the worked and the received.

## Employee health and safety

### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM can generate an impact on its employees' health and safety (occupational accidents and illnesses), well-being, and work-life balance.

### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The Organization may generate negative impacts in the performance of typical general & administration activities of its resources.

### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group has always been committed to ensuring a healthy and safe working environment through full compliance with relevant legislative provisions and by considering the safety and health of employees in the performance of their duties and activities a priority. In fact, the Group ensures full alignment with regulatory references on occupational diseases and occupational health and safety, with the aim of preventing possible accidents and damage to health in any way related to the performance of work.

The Domestic BU analyzes and evaluates risks to workers' safety and health with a view to their progressive reduction, adopting the principles, standards and solutions that constitute national and international best practices, and implementing appropriate prevention measures and verifying their adequacy and effectiveness.

In addition, in order to further strengthen internal management and control methodologies, and to complement the normal implementation of regulations in the management of occupational health and safety, an ISO 45001-compliant management system was implemented within the Domestic BU having all processes related to office and mixed-use real estate assets as its perimeter.

In Brazil, TIM is in the process of aligning its internal processes and regulations with the legislative changes that have taken place, while at the same time placing itself at the forefront, through participation in committees led by its union with other telecommunications companies, in reviewing laws that impact its industry, such as in the area of sizing of technical health and safety teams.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the preconditions for planning and implementing initiatives to deal with potential negative spillovers or result in positive economic, social and environmental impacts.

**[GRI 3-3d.ii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

As part of its activities, the TIM Group implements multiple actions to address negative impacts. In particular, the Company, inspired by the principles underlying the proper application of employee health, safety and welfare, has carried out and carries out numerous actions on a daily basis, the main ones of which are listed below:

- implementation of appropriate prevention measures and verification of their adequacy and effectiveness in order to promote the reduction of accidents, occupational diseases and other accidental events;
- carrying out, by the territorial Safety principals through specific investigations, in-depth investigations of the causes of accidents that have occurred in order to understand whether these are attributable to worker behavior, the work environment and/or external factors, in order to identify any critical areas for which intervention through improvement actions is necessary;
- actions for the encouragement of knowledge development, the promotion of technical-scientific research and collaboration with business associations, Authorities and Competent Bodies, in order to ensure increasingly effective management of processes and encouraging the application of Information Technology and new digital technologies in Health & Safety (H&S);
- promotion of initiatives aimed at ensuring the livability of work environments, preventing negative spillover into the employee's private sphere in terms of inadequate workloads, unorganized and unstructured environments and not able to make family management, home-work travel, and overall work-life balance easier;
- establishment of a careful system of selection, management and control of contractors and suppliers, including with respect to the adoption of the best standards, promoting discussion with them for the exchange and dissemination of good practices for accident reduction;
- representation of periodic information addressed to workers, trade unions, Authorities and other interested parties regarding health and safety activities,

performance and objectives to ensure a transparent dialogue aimed at promoting a culture of safety inside and outside the Organization.

Within the Domestic BU, the achievement of ISO 45001 certification and the establishment of the Safety Steering Committee is emphasized, with a view to directing and making corporate action on occupational safety and health issues more incisive. In particular, the Steering Committee Safety, chaired by the Chief Executive Officer, was established with the aim of intensifying the commitment on the subject and further structuring the Governance of the Organization on health and safety issues, as well as fostering the integration between the different business departments and execution.

With reference to BU Brazil, a new edition of the Bem+Estar Marathon and SIPAT, the Company's main annual health, safety and environment event, was held in 2022. In fact, in order to help provide a solution for negative impacts through fostering greater awareness of health and safety issues, TIM made a commitment during the period to follow up on this event, which in 2022 observed 12 conferences held online and spread over 2 weeks, with more than 4,000 participants. Topics such as mental health, happiness, longevity, healthy eating, physical activity, mindfulness, motivation, HIV/AIDS, and safety in the hybrid work model were addressed.

#### **[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

(See point d.i)

#### **[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

##### **[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to monitor and track the effectiveness of its actions, the TIM Group adopts monitoring processes in accordance with relevant standards, principles and good practices, based on systems for measuring recorded performance with reference to occupational health and safety. In this sense, in continuity with the previous year, in 2022 TIM in Italy conducted its monitoring in line with the provisions of ISO 45001, having as its perimeter all processes related to office and mixed-use real estate assets. Continuous monitoring of indicators related to the company's health and safety performance enables the Domestic BU to plan activities, resources and goals in order to provide for progressive elimination or minimization of risk elements and triggers.

##### **[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

The TIM Group adopts specific indicators useful for periodically monitoring progress against its initiatives implemented on the issue. In this regard, among the most significant performance indicators for measuring the effectiveness of the actions taken, TIM considers, for example, the number of accidents (excluding commuting) and the number of accidents per 100 workers.

In addition, in order to encourage the development of its employees' knowledge about the risk of occupational accidents and the negative impacts associated with the topic, TIM in Italy monitors the number of hours of training provided on health and safety, as well as the percentage of such training out of total hours.

Finally, in relation to monitoring the effectiveness of its actions aimed at providing useful solutions for improving working conditions and work-life balance, the Group monitors the turnover rate as an indicator capable of quantifying the degree of resilience of its initiatives aimed at ensuring the livability of the working environment.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions implemented by the Group in activities aimed at managing phenomena related to employee health and safety is evidenced by the following main results achieved:

- improvement in average duration of injury days (decreased by 9% vs 2021);
- stability in relative terms of the incidence of injuries per 100 workers (equal to 0.51). The slight increase from 2021 (0.47) can be attributed to the full recovery of the Group's activities after the pandemic;
- positive turnover rate in 2022 of 6% for men and 8% for women.

With regard, on the other hand, to the indicators related to health and safety

knowledge development, the Group observed a total number of hours provided to employees of 133,516, also associated with an improvement in the percentage of total hours, at 5% (vs 3% in 2021).

Finally, as further proof of the effectiveness of the activities implemented by TIM in Italy in order to conduct virtuous management of the issue, within the Domestic BU, management system certification in line with ISO 45001 was obtained.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

Over the years, the TIM Group has been committed to, and has been at the forefront of, ensuring the continuous updating of its body of legislation, and thus of its defined internal health and safety policies and procedures, in order to incorporate regulatory developments and ensure a healthy and safe workplace for its employees.

With this in mind, observing the insights emerging from the performance of activities and from the evidence of the analysis of accident phenomena, the Domestic BU over time has taken steps to update its management system, as well as has managed to follow up, by virtue of this, on particular experiments in this area, de facto introducing elements of Digital Safety in line with the activity carried out within its core business.

So, the awareness gained from its own actions and the day-by-day monitoring of the goodness of the progress made, have enabled the TIM Group to further understand the importance of its role in defining a healthy and safe working

environment; in fact, it is thanks to the adoption of such a commitment to the topic, declined in terms of policies and operating procedures, that the Company will be able to ensure the constant improvement of health and safety practices in the workplace, as well as to manage in the best way possible the impacts that occur.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

Constant discussion with the Group's stakeholders has enabled the pursuit of relevant actions useful in addressing actual negative impacts and providing solutions in the areas of employee health, safety and welfare.

In Italy, in fact, discussions with key stakeholders led to the establishment of the Steering Committee Safety making corporate action on H&S topics more pronounced; this strengthening of commitment will ensure the definition of strategic H&S policies and targets, ensuring their monitoring and control, the determination of transversal and vertical Action Plans and finally the promotion of a corporate safety culture.

In Brazil, on the other hand, through constant discussion with stakeholders and participation in committees led by its industry union, as part of the alignment of business processes and internal regulations with legislative changes, TIM has managed to record substantial progress in revising and adapting internal regulatory documents.

## Development and motivation of TIM employees

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM - through recruitment, retention and engagement policies and practices - can generate impacts on the development of the professional and personal skills and career growth of its people.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and implementing initiatives to manage potential and actual negative economic, social and environmental impacts.



**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group aims to be an increasingly inclusive company, capable of taking care of its People and improving the overall quality of living and working. Satisfaction and engagement are central pillars in the development of the strategy toward People. Demonstrating this commitment, the Group-wide Human Resources, Organization & Real Estate Policy was introduced, which governs all aspects affecting Human Resources, including engagement, development and training. In carrying out its activities, TIM places People at the center through defined paths designed on individuals for career management, the potential of which is useful to meet specific needs depending on roles, organizational positions and skills required in the long term.

Training, through targeted and diversified pathways, supports people in processes to consolidate skills for specific job profiles, soft skills independent of job role, and pathways aimed at upgrading or retraining. The training offer, accessible to the entire corporate population, intends to safeguard People's lifelong learning by encouraging self-training and empowerment on personal learning process useful for safeguarding their employability.

In this regard, over the years the Domestic BU has ensured the pursuit of its goals through policy and practice efforts and by committing to the introduction, within its Sustainability Plan, of the TIM People Plan. Specifically, the "TOGETHER" Plan encompasses all initiatives for people in the Domestic BU aimed at enhancing personal and organizational well-being to work and live better in the company. Starting in 2019, in fact, TIM has launched a major internal listening activity to get a snapshot of various aspects of the bond between the company and its people

in order to, among other things, better impact the development of its employees and enhance their capabilities.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:****[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

**[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

During 2022, the TIM Group identified specific actions to manage the actual positive impacts associated with the topic of employees development and motivation.

The following are the main actions carried out for this purpose in Italy:

- consolidation of training offerings aimed at safeguarding lifelong learning and employee employability through targeted and diversified pathways, including offering a choice of training paths on specific topics including architecture, operations, associate cloud engineer, cloud developer, collaboration, security, machine learning, and cloud digital leader;
- activation of retention actions for a group of young people in critical roles, including the economic incentive plan, dedicated higher education pathways, career developments and mentoring;

- articulated an overall Engagement Plan that aims to consider the well-being and satisfaction of the person throughout the employee journey and taking into account all needs, including those outside of work, by activating specific Engagement and Development plans for two clusters considered to be attentional: women and young people;
- preparation of a specific Engagement Plan for all young people Under 37, which included multiple initiatives, including: the redesign of the Onboarding Plan, a plan of meetings with Top Management, the activation of a “Young TIM” Community, generational comparison meetings, training paths dedicated to the target audience, and the design of a career policy;
- definition, within the framework of the Engagement Plan, of the Women's Project, articulated in 5 specific commitments that TIM makes to women and structured in 3 cross-cutting strands: Governance & Address, Climate & Culture and Empowerment & Career;
- completion of the Training and Retraining Project under the Expansion Contract that supported the business transformation process to ensure the necessary upgrading of technical and professional skills, starting with the strategic drivers of the business plan, including digital development, 5G/6G technologies, Cloud and Edge Computing, strategic and Business vision, Sustainability & value creation;
- activation of the “Apprendo” Training and Retraining plan, which provides each employee with the opportunity to build their respective training path by choosing courses to be included in their training plan within 4 areas of expertise: Technological, Vocational, Transversal, Ecosystem.

With reference to BU Brazil, some examples of actions implemented by TIM in order to manage its positive impact on the issue are represented below:

- launching the new work model to keep employee engagement high and strengthen employer branding;
- investment in training related to new knowledge and skills critical to business (e.g., Cloud, Data, Agile, CX, etc.) and operational efficiency (Sales, Customer Care);
- launching new editions of E-coaching and Corporate Mentoring to accelerate employees' growth and give them the tools to meet new managerial challenges;
- launch of the TIM + Conhecimento brand in the area of digital learning, understood as a new educational model that enhances the position and identity related to Education, thus contributing to the Company's Employee Value Proposition.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to evaluate and monitor the effectiveness of the actions taken in the area of employees development and motivation, the TIM Group has equipped itself with specific processes capable of quantifying the goodness of the initiatives and verifying the achievement of pre-established objectives and targets, through the use of performance indicators.

Through monitoring on an annual basis, the TIM Group adopts the Climate Survey as its main tool to get a holistic view, by business function and socio-demographic cluster, of employee engagement and satisfaction.

At the Domestic BU level, the effectiveness of actions put in place with respect to Welfare services is also monitored through Welfare Survey, which is also useful in identifying any gaps.

With reference to monitoring the effectiveness of the Domestic BU's efforts in relation to the performance development of its resources, TIM has adopted several additional processes, which are outlined below:

- Performance Management, through which job performance is evaluated annually and for which there are five specific steps: goal assignment, mid-year review, evaluator selection, evaluation and feedback;
- Potential Assessment process, redesigned during 2021, which allows resources

to be analyzed prospectively and independently of the role held, so as to ensure more effective organizational planning and enhance individual characteristics;

- the process related to the Work Drivers Map, a questionnaire useful for assessing Motivation and Employability of employees and capable of stimulating in them a greater awareness of their own characteristics, as well as developing dedicated action plans;
- Skill Assessment process, through which one is able to take a snapshot of the corporate population in terms of skills, knowledge and motivation, with the aim of identifying new development directions for individual and organizational performance.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In line with the 2023-2025 Business Plan, the enhancement of people and their development in terms of professional and personal skills is a priority for the TIM Group. With this in mind, the Group identifies objectives and reference targets, as well as related performance indicators to understand the effectiveness of the activities implemented.

Specifically, under the same Plan, the Group has defined two strategic goals and targets impacting the Domestic BU:

- Engagement of young employees: with a target  $\geq 78\%$  to be reached by 2025;
- People trained in ESG skills: with a target of  $\geq 90\%$  by 2025.

In order to keep track of the effectiveness of actions aimed at developing employees' skills, the Group voluntarily monitors a number of indicators, the main ones of which are given below:

- turnover rate, due to the retention and talent attraction policies undertaken;
- the percentage of employees who receive periodic performance and professional development evaluations to help them become aware of their own capabilities and areas for improvement;
- the average hours of annual training per employee, reflecting the Company's willingness to provide them with useful tools for their professional growth;
- hours of training provided in ESG to employees in order to enable them to support the Group in its sustainable development path.

Finally, the Domestic BU monitors the number of certifications related to both technological and methodological issues achieved by staff, attesting to the growth of employees' specialized skills.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions put in place by the Group, with reference to the development and motivation of its employees, is demonstrated by the following results achieved in 2022:

- Positive turnover rate in 2022 of 6% for men and 8% for women;

- recorded in 2022 a percentage of 97.5% with respect to the number of employees receiving periodic performance and development evaluations;
- +164,272 (vs 2021) hours of sustainability training provided to employees.

The following are the main achievements of the Domestic BU:

- consuntivation at 77% of Young Employees Engagement;
- reached 69% of the Company's people with ESG skills training activities;
- achievement of 110 certifications under the Google Training Project and 4800 certifications, related to both technology/vendor issues (e.g., Cisco, Juniper, Huawei, Google, VmWare, Oracle, Microsoft, etc.) and methodology (ITIL, PMP-PMI, Scrum). In addition, 540 certifications were renewed in the year 2022 and another 360 were obtained ex-novo;
- provision of 800 thousand hours under the Training and Retraining Project under the Expansion Contract, 300 thousand hours under the "Apprendo" Plan, 15 thousand hours of training through the Speex platform.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

In the highly evolving environment that has characterized the past few years, the evidence that has emerged in the course of conducting business activities has led the TIM Group to orient its outlook toward an increasingly systemic vision, attaching strategic importance to the needs of the new generations.

As a player operating in the ICT sector, the Group has become increasingly aware of how technological innovation cannot be a stand-alone variable, but must be integrated into the sphere of knowledge and tools available to the corporate population in order to respond to the social and environmental challenges faced by TIM.

With this in mind, the Group invests in its people, understood as a wealth of humanity, experience and expertise that constitutes a unique competitive lever, an element of corporate identity capable of driving the sustainable success of its business. These intentions, in fact, have led the Group to adopt in Italy a People Plan - Plan INSIEME, characterized by numerous initiatives aimed at their development and well-being, and a Group Policy dedicated to Human Resources, the Human Resources, Organization & Real Estate Policy, which aims to ensure the best management and promotion of human capital.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

In the context of employees development and motivation, continuous discussion with stakeholders has proven to be a key activity for the TIM Group in order to understand their instances and take the most effective actions to achieve important progress against the monitored indicators and targets set in the Business Plan.

Moreover, with this in mind, discussion with corporate Management has been essential. In fact, in Italy, this has been actively involved in the process of assigning goals in the different Engagement Plans and, specifically, for those related to the

clusters targeted by the Group, namely youth and women. The active participation of top management, on the one hand, has certainly enabled more effective actions to be taken that meet the needs of employees; on the other hand, at the materiality stage, it has contributed to the identification of a specific material topic focused on the issues of retention, engagement and development of human resources.

## Climate change

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM's activities and its value chain may have an impact on climate change in terms of greenhouse gas emissions and global warming as a result of fossil fuel consumption and refrigerant gas leakage.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The TIM Group can contribute to the negative impacts either directly, through its own activities, or also indirectly through the impacts recorded along the entire value chain, with particular reference to the supply chain, which includes, among the main business relationships, relationships with companies operating in the manufacturing, service, content producers sectors.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

As one of the leading players operating in the ICT sector, the TIM Group is keenly aware of its role in building a low-carbon future. In fact, the ICT sector structurally rests its business on fixed network, mobile, and data center infrastructures that are energy intensive, growing year by year, impacting the environment in terms of CO<sub>2</sub> emissions. The Group, therefore, has followed up with multiple initiatives to address this phenomenon.

The TIM Group's commitment to contributing to the resolution of negative climate change impacts in terms of emissions is reflected in its strategy, described and disseminated as part of the Group's broader Environmental Policy - structured in line with the main international reference standards (e.g., ISO 14001, ISO 14064, ISO 50001, GHG Protocol), which places, in relation to the issue, among the Organization's main objectives:

- the reduction of its own direct and indirect greenhouse gas emissions;
- the selection of sustainable suppliers in order to contain greenhouse gas emissions throughout the entire value chain;
- the efficient and low-emission management of infrastructure;
- the development of low-emission solutions, products and services for customers;
- transparent and systematic communication to its stakeholders of its climate strategy commitments.

In addition, in order to go beyond the normal transposition of regulations in the management of climate change issues, some functions and/or companies in the

Group with significant impact on stakeholders have achieved certifications in line with ISO 14001 and ISO 50001.

Further evidence of the Group's emphasis on the material topic is the validation of our emission reduction commitments by the Science Based Targets initiative (SBTi). Finally, the TIM Group is an active member of both specific industry associations and nonprofit organizations with environmental protection as their goal, the main ones of which are listed below:

- European Green Digital Coalition;
- Ecorating;
- GSMA Foundation;
- European Telecommunications Network Operators' Association (ETNO);
- European Telecommunications Standards Institute (ETSI);
- Global e-Sustainability Initiative (GeSI);
- International Telecommunication Union (ITU).

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:****[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and

fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at preventing or mitigating potential negative spillovers or bring about positive economic, social and environmental impacts.

**[GRI 3-3d.ii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

The TIM Group is committed to developing projects aimed at providing and helping to provide a solution to the actual negative impacts on climate change in terms of greenhouse gas emissions and global warming. The most significant actions at the Group level include:

- development of environmental targets in line with the requirements of the Science Based Target initiative;
- adoption of ISO 14001-certified environmental management systems (both in Italy and Brazil).

In relation to the initiatives carried out by BU Domestic, the main ones are listed below:

- implementation of projects aimed at saving energy and resources through the implementation of a Building Energy Management Systems, based on a

series of HW IoT devices for monitoring, control and advanced maintenance management of technological systems (power and air conditioning) serving the halls of fixed-line power plants;

- gradual modernization of technology assets in industrial properties according to a replacement plan that takes into account the age of the facilities based on the strategic nature of the sites, in order to strengthen the resilience of the assets in support of the business as well as bring about emission benefits;
- creation of a plan of interventions, at the national level, to upgrade the infrastructure and efficiency of air conditioning systems on power plants, in order to ensure a lower impact in terms of emissions;
- implementation of the plant modernization plan of specific Data Centers in the territory of Italy;
- increased use of renewable energy sources through Guarantees of Origin and a Power Purchase Agreement with ERG.

In addition, the Domestic BU continued the project undertaken in 2021 and starting from July 2023, aimed at implementing a plan to install 14 photovoltaic plants with a capacity of about 0.7 GWp, and also started an extraordinary maintenance work to improve the efficiency of 101 existing small-scale plants in the country with a capacity of about 0.9 GWp, with consequent benefits in terms of emissions.

With reference to the actions carried out by the Brazil BU, TIM over the past few years has implemented a number of initiatives aimed at managing its actual negative impacts, including:



- the definition of the SkyCoverage project, which aims to prioritize the use of simplified facilities and renewable energy, such as solar panels, to connect towers and antennas in remote areas of the country, thus contributing to the Group's environmental impact reduction goals;
- purchasing energy from renewable sources with medium-long-term contracts in order to lower its emissions impact.

**[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

(See point d.i)

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to monitor the effectiveness of the actions taken by the TIM Group, with the aim of proactively contributing to the resolution of the actual negative impacts on climate change, the Organization has defined a series of processes, incorporated in policies and operating procedures, which are declined into measurement systems, through indicators aimed at tracking the progress achieved with respect to its objectives and targets defined in this area, in the confirmation of ISO 14001 certification and in obtaining ratings on environmental matters from prestigious international organizations.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In line with what was disclosed as part of the 2023-2025 Business Plan, TIM has voluntarily set ambitious specific targets aimed at ensuring the Group's contribution to the transition to a low-carbon economy. Specifically, the TIM Group has adopted the following targets:

- Net Zero (Scope 1+2+3) by 2040;
- Carbon Neutrality (Scope 1+2) by 2030;
- 75% reduction in emissions from the Company's production activities (Scope 1) and power purchase (Scope 2) by 2030 (baseline 2019) - target validated in 2022 by SBTi;
- 47% reduction in Scope 3 emissions (categories 1, 2 and 11 - 2019 baseline) by 2030 - target validated in 2022 by SBTi.

Therefore, in order to assess progress against its objectives and targets, the Group conducts constant monitoring of the following indicators:

- amount of Scope 1 emissions generated by production (direct emissions);
- amount of Scope 2 emissions generated by the purchase of electricity;
- amount of Scope 3 emissions produced (categories 1, 2 and 11);
- Organization's GHG emission intensity rate (carbon intensity).

In addition, the Group monitors the achievement of awards and ratings that are representative of its environmental performance.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions taken by the Group to manage the actual negative impacts related to climate change is mainly demonstrated by:

- obtaining ISO 14001 certification (both in Italy and Brazil);
- inclusion of the Group in the “B-list” of the CDP organization (formerly the Carbon Disclosure Project) related to Climate Change, improving its performance from the previous assessment obtained (2021: B-);
- 12% vs 2021 reduction in Scope 1 emissions generated by production;
- the 16% vs 2021 reduction in Scope 2 emissions generated by power purchase;
- the reduction of about 43% vs 2019 in Scope 1+2 emissions generated in 2022;
- the reduction of Scope 3 emissions generated by 13% vs 2021 (categories 1, 2 and 11) and more than 8% vs 2019 (categories 1, 2 and 11);
- the 26% reduction (vs 2021) in BU Domestic's GHG emission intensity (carbon intensity).

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

The commitment of entities such as the TIM Group to ensure increasingly effective management of the actual negative impacts related to climate change appears to be necessary in light of its size and the specificity of business activities related to the ICT sector, which by its nature is highly energy intensive.

In fact, this awareness has led the Group to regulate in a timely manner the aspects related to the environmental impacts generated by its activities, strengthening

its body of legislation on the subject and adopting processes and procedures in line with the main standards on the subject (e.g., ISO 14001, ISO 50001 and SBTi), and paying particular attention to providing proper, transparent and systematic communication to stakeholders of its commitment.

In this regard, the TIM Group understood that reporting up to par, capable of clearly and transparently communicating the actions put in place, the targets adopted, and the progress achieved, can not only ensure the generation of value in terms of brand reputation at the sector level, but at the same time lead the ICT sector itself in the pursuit of national and international ambitions in terms of combating climate change.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The discussion that took place with stakeholders as part of the 2022 materiality analysis, compared to 2021, emphasized the need to assign two distinct strategic relevance to the topics “Climate change” and “Energy transition”, highlighting their relative specificities. In addition, the constant discussion conducted with stakeholders on the topic in the course of carrying out daily business activities has proven to be of primary importance in order to guide actions and define the Group's priorities on the issue, supporting the management of actual negative impacts.

In fact, the dialogue with stakeholders has incentivized the Organization in implementing the many initiatives aimed at reducing carbon emissions, and

in taking on important medium-long-term ambitions aimed at contributing to the transition path to a low-carbon economy of the communities in which TIM operates.

## Energy transition

### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM's activities may have environmental, social, and economic impacts associated with the transition from a predominantly fossil energy production and consumption system to one based on renewable and alternative sources.

### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is a potential positive one. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of

identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and implementing initiatives to manage potential and actual negative economic, social and environmental impacts.

### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group has always been aware of its role in facilitating the energy transition. Every ICT company can contribute concretely to the energy transition through efficient management of its core business activities (network management and data center) in addition to other characterizing solutions: smart working, telemedicine platforms, sharing and e-learning platforms, and videoconferencing systems are services that can promote more sustainable lifestyles and ensure the performance of activities while safeguarding the environment. The TIM Group is present and active in sector associations and nonprofit organizations whose objectives include environmental protection; in fact, the relevance for TIM of environmental topics and their impacts is highlighted in the materiality matrix, which incorporates the assumptions of the Sustainable Development Goals and is translated into the TIM Energy Transition Strategy, described and disseminated as part of the Group's broader Environmental Policy:

- establishment of management guidelines and procedures for optimizing the use of energy sources and natural resources;
- allocation of human, technological, economic resources for actions to protect the environment;
- progressive reduction of energy consumption from fossil fuels;

- development of solutions and products that contribute to the energy transition;
- variable remuneration for management upon achievement of goals with positive environmental impact;
- dissemination to employees and stakeholders of a correct approach to environmental issues.

In addition, again in order to go beyond the normal transposition of regulations in the management of energy transition topics and generate value in this regard, some functions and/or companies in the Group with significant impact on stakeholders have achieved and/or confirmed certifications in line with ISO 50001.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

**[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

TIM has always been committed to implementing energy efficiency and rational resource consumption programs: within the Network Operation & Wholesale Department operates the Real Estate - Energy Management & Procurement Function, focused on energy issues with a mandate to identify and finalize

appropriate interventions aimed at fostering energy transition. In addition, in liaison and functional coordination with the relevant structures of the Chief Technology Office, the function ensures design and implementation consistency of the adopted solutions with respect to the Company's efficiency plans.

Below are the specific areas on which the main actions put in place are focused:

- obtaining for some particularly representative sites of the Domestic BU, the Energy Management System in line with ISO 50001 certification;
- use of energy from renewable sources, with the Domestic BU continuing to operate by increasing the use of energy from renewable sources in business processes, through the purchase of energy from Guarantees of Origin, the development of on-site photovoltaic plants, and Power Purchase Agreements, such as the agreement between TIM and ERG to supply 3.4 Terawatt-hours (TWh) of green energy (from wind power plants) over ten years. With particular reference to the Brazil BU, in this regard the commitment is more about adopting Distributed Power Generation practices;
- energy efficiency projects on a number of industrial buildings in Italy, with interventions that focused particularly on the reengineering of cooling systems and related monitoring for the purpose of improving energy performance, and the replacement of obsolete CDZ fans for chilled water systems;
- trigeneration, a new plant was activated in 2022 at the Bologna Centralinista site for an installed capacity of 0.8 MW, bringing the total size of the trigenerator park present in Italy to 17 plants (including 3 Noovle plants) for a total capacity of about 19 MW;
- sustainable mobility interventions, through the development of initiatives to

facilitate the use of sustainable means of people in the Domestic BU, such as the plan to replace 25% of the cars in Car Sharing with Full Electric powered cars.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to monitor the effectiveness of the actions taken by the Group with the aim of generating positive impacts through its energy transition path, the Parent Company has implemented a series of processes, incorporated in operational policies and procedures, concerning measurement systems, including indicators aimed at tracking progress achieved against its objectives and targets defined in this area, and the achievement/confirmation of ISO 50001 certification for the most representative sites.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In continuity with the targets already set in 2021, TIM confirms for Plan 23-25 the target on renewable energy to cover 100% of domestic electricity needs by 2025, to which the Brazil BU also aligned with 100% share of renewable electricity by the same year. This target enables the Group to make its contribution to relevant

national and supranational goals, such as the United Nations Sustainable Development Goals.

In order to assess progress against its goals, TIM continuously monitors the percentage of green energy purchased out of total purchased energy, the increase in self-generated renewable energy use, the coverage of renewable energy by company in the Group, with the breakdown by asset or perimeter, and energy consumption based on non-renewable sources.

In addition, the Group measures its energy efficiency through the eco-efficiency indicator, declined for BU Domestic and BU Brazil, which relates the service offered to customers (transmitted bits) to the impact on the environment (joules of energy consumed).

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions taken by the Group to manage the positive impacts and its own goals and targets related to TIM's energy transition path<sup>(3)</sup> is mainly demonstrated:

- in obtaining certification related to the Energy Management System, in line

<sup>(3)</sup> The TIM Group companies included in the '22 environmental scope are listed below: TIM S.p.A, Sparkle Group (companies that meet the criteria as reported in the methodological note), Fibercop S.p.A, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telenergia S.r.l., Telsy S.p.A., TIM Retail S.r.l., TIM Servizi Digitali S.p.A., as well as BU Brazil.

- with ISO 50001, for the most representative sites;
- in the increase of about 16% (vs 2021) of purchased energy from renewable sources<sup>(4)</sup>;
- in the increase of about 8% (vs 2021) of purchased energy from renewable sources in total purchased energy;
- in the 13% (vs 2021) increase in the BU Domestic eco-efficiency indicator figure;
- in achieving in 2022, at the Group level, a 61% share of electricity from renewable sources in total electricity.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

TIM's commitment to addressing its energy transition journey has led to an understanding of how optimizing production processes and logistics flows help customers reduce energy consumption generated by physical travel and related emissions. Improved efficiency, savings in economic terms, and reduced impacts on the environment associated with the effective use of TIM services also represent a real business opportunity for the Company: stakeholder and citizen awareness of issues related to the energy transition is growing resulting in a focus on companies that can ensure a sustainable future for the planet and society. All this translates into the incorporation of insights that emerge in the course of carrying out activities within the company's processes and policies, with the aim

of achieving increasingly high-performing results in terms of consumption from year to year.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

Discussion with the Group's strategic stakeholders has particularly conditioned the actions taken related to the topic of energy transition. Specifically, the significance of the impact associated with it led to the separation of the discussion and assessment of impacts from the more generic "Climate change" topic into which it was originally subsumed, highlighting "Energy transition" as a separate topic. This initiative has led the Group to assume a stronger commitment to the topic, influencing planning and enabling more positive performance than in the past.

## Legal and regulatory context management

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

Any behaviors of the TIM Group contrary to laws and regulations as well as uncompetitive behaviors may impact both the market environment in which the

<sup>(4)</sup> Also via GO purchase in Italy and RES in Brazil.

Group operates and the stakeholders directly or indirectly related to its activities.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The Organization could be involved in the negative impacts in the operation of its activities.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group is committed to conducting its business in full compliance with the regulations and laws in force in the states in which it operates, and with universally accepted ethical principles inspired by transparency, fairness, legality and loyalty. Ensuring full compliance with the provisions inherent to TIM's industry, and to matters such as, for example, anti-corruption, fair competition and taxation, is of utmost importance to the Group, which is committed to doing so through the introduction of ad hoc policies, procedures and tools, as well as through the achievement of prestigious certifications (e.g., ISO 37001).

In particular, in confirmation of the Group's constant commitment to combating corruption in all its forms, TIM has adopted the Anti-corruption Management System (AMS) for which UNI ISO 37001 "Anti-bribery Management Systems" certification was obtained from an accredited body, both in Italy and Brazil.

Within the broader AMS, TIM has defined and periodically updated a number of tools, including, the Code of Ethics and Conduct, with the aim of condemning the use of illegitimate or unfair behavior, while refraining from the conduct, sharing or tolerance of any form of corruption and unfair competition.

The Group's Anti-Corruption Management System complements the broader anti-corruption compliance program, which also consists of the 231 Organizational Model (adopted in 2003 pursuant to Legislative Decree 231/2001 on the administrative liability of corporations) in which the area of corruption prevention is included, the latter adopted in Italy.

In addition, under the AMS, the Parent Company has adopted a Group Anti-Corruption Policy, updated in 2022, in order to represent the systematic framework in which the standards and rules of conduct to be adopted for the prevention of corruption throughout the Organization are defined.

As part of the management of corruption behaviors, the Domestic BU adopts the Whistleblowing Procedure which, where not expressly prohibited by local laws, encourages and allows employees and third parties to report in good faith or based on reasonable belief, behaviors (of any nature, including mere omissions) referable to TIM Personnel and/or Third Parties that are non-compliant/in violation of laws and regulations, the Code of Ethics and the 231 Organizational Model, as well as the system of rules and procedures in force in the Group, including but not limited to policies related to Human Rights, taxation, anti-corruption. As for the Brazil BU, similarly TIM S.A. adopts an ad hoc procedure in order to handle corrupt behavior in the area of whistleblowing.

With reference to the management of taxation, this is inspired by the principles



contained in the Group's Code of Ethics and Conduct, the latter believing that full transparency towards financial administrations is part of its duties as a taxpayer, also in terms of social responsibility. TIM is convinced that full compliance with tax obligations, by all businesses competing in the various markets, constitutes not only a duty of all taxpayers, but also a necessary condition for the establishment of an environment of fair competition, among businesses that compete, and compete, in the same markets. This commitment is reflected in the TIM Group's fiscal operations as outlined in the Fiscal Strategy document.

In relation, on the other hand, to the management of anticompetitive behavior, the Domestic BU over the years has implemented a comprehensive antitrust compliance program, engaging in multiple initiatives with the aim of ensuring more effective antitrust risk management. In addition, TIM in Italy has been committed to ensuring compliance with consumer protection regulations, thanks in part to commitments made in the Unfair Commercial Practices proceedings before the Italian Competition Authority (AGCM).

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

As part of the activities carried out by the Group in managing the legal and

regulatory environment, specific actions aimed at preventing and mitigating the potential negative impact associated with the topic have been implemented.

Among the most significant actions within the Group are:

- the adoption of an ISO 37001-certified Anti-Corruption Management System, whose underlying Anti-Corruption Policy was updated in 2022, further underscoring its commitment to averting unlawful or otherwise unethical behavior in order to achieve its economic goals;
- provision of specific anti-corruption training courses to the corporate population;
- training and support activities for all employees involved in fiscal activities to ensure that all employees attain the right skills and experience to meet their responsibilities.

In relation to the initiatives carried out by BU Domestic, the main ones are listed below:

- definition of e-mail analysis of certain executives who, in view of their functions, may be called upon to handle antitrust-sensitive issues;
- activation of an online antitrust training campaign, which launched in 2019 and concluded in FY2022, aimed at the provision of specific knowledge referring to the anticompetitive topics;
- introduction of the analysis on the organizational procedure ("Merger & Acquisition Process") to determine whether the M&A transactions in which

the Company is involved, coordinated by the Mergers & Acquisitions Function of Chief Financial Office during the period between July 1, 2021 and May 31, 2022, comply with antitrust regulations on restrictive agreements and abuse of dominant position and must be notified to the AGCM under the regulations on prior control of merger transactions;

- extension of the mode of acquiring consent through “Digital Confirmation” to the portfolio of its offerings, and implementation of the communication campaign on different channels for customer reimbursement, under the Unfair Business Practices proceeding at AGCM PS 10888;
- improvement of the commercial communication of its website in order to ensure that consumers are immediately informed about the essential elements of the offers in order to make an informed choice from the first contact, under the Unfair Commercial Practices proceeding at AGCM PS 12231;
- submission to AGCM of the proposed commitments in order to resolve the competitive concerns under investigation and reach the conclusion of the proceedings without the imposition of any sanctions, under the Antitrust Proceedings at AGCM I850 - FIBERCOP AGREEMENTS;
- closure of digital subscription services in “carrier billing” (so-called Premium Services) to the TIM brand impacted by Resolution 91/22/CONS, pursuant to consumer protection proceedings at AGCOM;
- implementation of specific actions taken, including the introduction of encryption of sensitive data on the systems concerned and the sending of detailed data to AGCOM on a periodic basis, in accordance with the commitments submitted to TIM by AGCOM in resolution 420/19/CONS

following the opening of the 3/18/DRS sanction proceedings for failure to take appropriate measures to ensure the confidentiality of OLOs' customer data when opening fixed-line fault or inefficiency tickets.

With reference, on the other hand, to the activity carried out by TIM S.A., the Brazil BU has carried out several actions aimed at mitigating the potential negative impact resulting from any behavior that does not comply with laws and regulations as well as non-competitive behavior. The main actions conducted in this regard are defined below:

- updating the TIM Integrity Program's institutional documents, including the Code of Ethics and Conduct, the Anti-Corruption Policy, and the Anti-Corruption System Manual;
- promotion of discussions and studies with academic institutions to support research activities on Brazil's competition policies.

**[GRI 3-3d.ii, d.iii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; / actions to manage actual and potential positive impacts**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the potential negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and

organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at dealing with actual negative spillovers or bring about positive economic, social and environmental impacts.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

With the aim of keeping track of the effectiveness of the actions taken to prevent and mitigate potential negative impacts, the Group has developed a series of processes that monitor the indicators adopted on multiple aspects, also taking into consideration the guidance of the main ISO standards on the subject (e.g., ISO 37001).

In addition, the TIM Group has adopted a process for monitoring reports from both internal and external sources (Whistleblowing). In this regard, in Italy TIM uses a single channel for the transmission of reports that can handle them with the maximum guarantee of confidentiality and protects those who adopt it from retaliation. In Brazil, on the other hand, TIM S.A. uses an automated end-to-end reporting management system, accessible via the intranet and from the company website, which can automatically record all reports received and allow status monitoring to the reporter.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In connection with its initiatives to prevent and mitigate the potential negative impact of the identified topic, the Group constantly monitors the occurrence of corruption incidents, the proceedings related to them against Group companies, as well as the annual rate of change in hours of training provided in the area of corruption.

At the same time, by virtue of the training programs provided in antitrust matters in Italy and the commitments achieved in the framework of the investigations with the Authorities, the Domestic BU has evaluated the monitoring of specific indicators capable of annotating the goodness of the actions, among which the main ones are listed below:

- percentage of utilization to anti-competitive training courses;
- effectiveness of the commitments made in connection with the resolving action of BU Domestic in the context of the competitive concerns of the Fibercop Agreement.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

In line with its commitment to increase and incentivize employees' knowledge of behavior inconsistent with laws and regulations, thereby preventing their implementation by employees, the Group noted a significant improvement in 2022 in terms of hours of anti-corruption training provided; in particular, TIM showed a 758% increase (174,475 hours in 2022 vs 20,315 in 2021).

In addition, in line with previous years, the Group also found no corruption incidents in 2022.

In relation to the indicators monitored by the Domestic BU, as part of its program carried out, TIM noted a wide coverage of the training courses provided on anti-competitive issues; in fact, the program, concluded in early 2022, showed a utilization rate of 91%, confirming TIM's commitment to preventing possible unfair behavior by developing awareness of it.

Finally, with reference to the current fiscal year, TIM in Italy noted the AGCM's approval of its commitments, which were deemed capable of eliminating the alleged anticompetitive profiles that were the subject of the investigation, and assessed as enabling an increase in the degree of infrastructural competition, causing the proceedings to conclude without the imposition of any sanctions.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

The TIM Group's considerable commitment to the proper implementation of behaviors aimed at fostering compliance with regulatory provisions is represented by the multiplicity of initiatives carried out in this regard, and the proper application of them, allows the Organization to be aware of its leading role in the market and the community for full compliance with legality, transparency, fairness and loyalty.

TIM, in fact, has increasingly realized over time that it can set an example for the market and the community at large, by virtue of its business and its importance in the ICT sector as a major player in terms of development, size and relevance. The TIM Group, therefore, will be able to proactively influence the market and

the community, both in the present and in the future, through the execution of preventive actions aimed at countering behavior that is not in line with laws and regulations, thus ensuring, at the same time, that the integration of its actions into the company's operating policies can ensure their lasting effectiveness, not only internally but also externally.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

Stakeholder engagement was of primary importance for the TIM Group, both in compliance with regulations and in relation to the initiatives conducted in order to prevent non-transparent, unfair and unfair behavior; in fact, the 2022 materiality analysis revealed the need to detect a specific negative and potential impact associated with the topic.

In particular, the managed confrontation with the Authorities was found to be necessary and relevant in order to ensure increasingly robust compliance with regulatory demands and commitments conducted in compliance with the deliberate proceedings against it.

At the same time, with a view to continuous improvement of its employees' compliance with relevant policies and best practices, constant discussion with stakeholders has fostered the adoption of tools aimed at regulating, controlling and monitoring the effectiveness of its actions in the area of anti-corruption, enabling the achievement of important results in line with its expectations.

## Equal pay and opportunity

### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM's processes (e.g., hiring, compensation, career development, financial and non-financial benefits) can impact the Group's diversity, equal pay and opportunity.

### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The Organization could be involved in the negative impacts through its resource management activities.

### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

Promoting a corporate culture marked by respect, inclusion and appreciation of diversity, ensuring equal opportunities on every aspect to all employees, is a matter of fundamental importance to the TIM Group. TIM's commitment to the topic is defined first and foremost within the Code of Ethics, where it is stated that for the Group one of the critical success factors is the contribution that each person can make to the Organization, where diversity is considered a strategic asset for long-term sustainable growth. TIM's commitment was also renewed through the Human resources, Organization & Real estate Policy, which makes

explicit the Group's principles aimed at ensuring an inclusive work environment, in the belief that there is a deep and positive relationship between inclusion and business performance. In fact, the Group guarantees equal opportunities in hiring, remuneration, access to training, promotion, retirement, in relation to race, class, nationality, religion, disability, sex, gender, sexual orientation, union membership or political affiliation, and age, taking into account the cultural and legal peculiarities of individual countries. Within the same Policy, discipline was given to compensation policies, among other aspects. TIM's Remuneration Policy, in fact, aims to support the achievement of the guidelines defined in the Business Plan, ensuring on the one hand, the competitiveness of the company in the market, and on the other hand, the protection of the principles of equity. The goal is to have a compensation architecture that provides for the balancing of the monetary component of compensation (fixed and variable pay) and the enhancement of the nonmonetary component (benefits and welfare).

In addition, TIM is a founding partner of "Valore D," an association of companies for the promotion of women's employment and leadership, the main initiative under its Diversity and Inclusion (D&I) program in Italy. In this regard, the Group has certified its practices in line with the UNI ISO 30415 "Human Resource Management Diversity and Inclusion" standard and, in 2023, will engage in the drafting of a Career Policy, including a specific affirmation on the gender gap, and will embark on the path of obtaining UNI PdR 125:2022 (Certification for Equal Gender Opportunity).

Finally, the company has committed, with the signing in 2017 of the Manifesto for Women's Employment and the publication in March 2020 of the TIM Manifesto for

Reducing the Gender Gap, to monitor company performance on certain areas such as gender quotas, the pay gap, succession and promotions, talent management, STEM subjects and professions, training, parenting, and flexibility tools.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

With respect to the material topic of equal pay and opportunity, TIM is committed to taking all necessary actions to prevent and mitigate potential negative impacts. In this regard, the Domestic BU, in order to ensure equal opportunity and enhance diversity and inclusion, has developed the Diversity & Inclusion program, which has 5 specific areas: dissemination of the Culture of Inclusion, Disability Management, Longevity Management, Gender Gap, and LGBT Management. Under the program, among others, TIM in Italy conducts the following actions:

- overall training events on D&I offered to both employees and business managers;
- publication on TIM Academy of training tracks on gender, language and age bias;
- involvement of the entire corporate population in the Harvard Implicit Test, in partnership with Harvard University, to measure unconscious gender bias;
- actions aimed at updating technological equipment and adapting workstations to the needs of people with disabilities, so as to break down all physical barriers

and adapt to the specific needs of this category of workers;

- organizing a series of role-modeling meetings, “Female LeadHERship,” to combat gender bias and prejudice;
- launch in 2023 of the Group Empowerment project, a development path aimed at 200 female colleagues;
- participation in the “4 Weeks 4 Inclusion”, an initiative designed by companies to raise awareness of the issues of inclusion and valuing diversity, which 250 partners joined in the 2022 edition.

Another strategic project carried out in D&I by the TIM Group in Italy is the Women's Project, developed in three areas: Climate & Nature, Empowerment & Career and Governance & Address, aimed first and foremost at reducing the gender gap and improving women's perceptions of equal opportunities in the Company. Included in the actions of this project are initiatives such as:

- introduction of additional parental leave, by which 10 additional days of paternity leave can be taken, compared to the 10 already provided in the Budget Law 2021;
- introduction of a psychological desk that can support a new parent's difficult times;
- development of a training course on parental and family roles.

With reference to the equal pay aspect, the Nominating and Remuneration Committee is in charge of establishing Variable Incentive Plans with predetermined

and measurable financial and non-financial objectives, consistent with the Strategic Plan, setting short and medium-long term incentive targets (MBOs and LTIs) in order to be able to guarantee equal treatment in this regard. In this regard, as part of its Remuneration Policy, the Group has adopted management incentive goals that promote, for example, equal pay and opportunity, particularly related to the gender pay gap and the percentage of women in senior positions.

With respect to BU Brazil, some main actions carried out by TIM S.A. are listed below:

- adoption of a Diversity & Inclusion (D&I) program aimed at encouraging equal opportunity;
- definition of the TODAS Group program, aimed at women in leadership positions in the Company, as well as positions below leadership;
- introduction of the Imagine That It Is Possible to be Heard project, featuring multiple social media actions and communications;
- introduction of Semana da Empregabilidade (Employability Week), with the aim of providing 500 job opportunities for women throughout Brazil;
- in the area of sexual orientation and gender identity, the Company has developed Transforma TIM, a program that offers job opportunities in its operational positions and 100% discounts in degree programs for transgender people;
- establishment of training paths for the development of all TIM S.A.'s black

professionals, as part of the activation of the Black People Development Program, offering them the opportunity to grow in their careers and gain a leadership position in the future;

- launch of the Crash Program, created to accelerate the hiring of people with disabilities and educate all staff on the inclusion of this segment.

**[GRI 3-3d.ii, d.iii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; / actions to manage actual and potential positive impacts**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the potential negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at dealing with actual negative spillovers or bring about positive economic, social and environmental impacts.



**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to keep track of the effectiveness of the actions TIM has taken with the aim of ensuring equal pay and equal opportunities, the Group adopts measurement systems aimed at the constant monitoring of diversity and inclusion and equal pay indicators, subjecting itself, in addition, to different assessment processes conducted by external agencies to receive an assessment with respect to its level of maturity in relation to Diversity, Inclusion and Gender Equality topics (e.g., Bloomberg, Refinitiv).

In addition, a Salary Review Rolling process is conducted annually at the Domestic BU level in order to progressively align fixed compensation with market practices, intended as a tool for attracting and retaining resources of high managerial ability, while respecting economically sustainable business management. In addition, the Nominating and Compensation Committee conducts specific analyses to monitor the Gender Gap & Inclusion over time.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In line with the TIM Group's ambitions regarding the enhancement of diversity and equal opportunities, each year the Group sets itself increasingly challenging goals, monitored through specific performance indicators that enable it to understand the effectiveness of the actions taken.

Specifically, as part of the new 2023-2025 Business Plan, the Group has a goal of achieving  $\geq 29\%$  women in leadership positions by 2025. In order to evaluate the goodness of the actions taken useful for the achievement of this objective, the Group monitors the percentage of female presence within the Collegiate Bodies.

Added to this is the monitoring of additional specific indicators such as:

- the percentage of female “Top Managers” out of the total number of “Top Managers.”
- the percentage of female executives in the total number of executives.

With reference to BU Domestic, targets have been set related to the short- and long-term variable incentive system intended for a part of the company management, such as:

- MBO 2022: decrease in Gender Pay Gap in the Managerial Cadre segment;
- LTI 2020-2022 (The Cycle 2021-2023): increase in the percentage of female executive population in the total executive population;
- SOP 2022-2024: Percentage increase of women in senior positions out of the total number of senior position holders.

With specific reference to the Brazil BU, in line with the ESG Plan, the Company has the ambition to achieve:

- 35% of women in leadership positions by 2023;
- 40% black employees by 2023.

In line with these objectives and, more generally, with the goal of ensuring equal pay and opportunities in the Company, the Group monitors, among others, the following performance indicators:

- presence of the Organization within prestigious thematic sustainability indices and obtaining relevant awards;
- ratio of basic salary and pay of women to men for each category of employees;
- the percentage of female executives in the total number of executives;
- the number of female cadres;
- the number of employees with disabilities.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions implemented by the Group with regard to equal pay and equal opportunity is demonstrated by the achievement of the following results:

- also confirmed for 2023 in the Bloomberg Gender Equality Index (GEI);
- entry into the Top 100 of the Refinitiv D&I Index, becoming the world's top telco in the ranking of companies that have excelled in diversity inclusion and promotion policies;
- obtaining UNI ISO 30415 "Human Resource Management Diversity and Inclusion" certification;
- achieved more than 28% of women in leadership positions;
- about 27% women participants in management committees (over +5% vs 2021);

- about +3% (vs 2021) compared with the number of female executives;
- achievement of Management's gender pay gap targets in the Domestic BU variable incentive systems;
- obtaining, in Brazil, WOB (Women On Board) recognition, a Brazilian initiative that certifies companies that have at least two women on the board.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

In a context in which attention to respecting and valuing diversity is increasingly high, for the TIM Group, the commitment made through initiatives aimed at communicating a strong sensitivity of the same to these topics leads to an improvement in its brand reputation but above all in its performance, enabling the definition, in this way, of an organization that is inclusive, attracts new talent and ensures the well-being of its resources in the performance of its activities.

This focus led TIM to be the first company, in the Italian panorama, to undertake an Equity & Inclusion Management program and, since 2009, to introduce the figure of the Diversity Manager.

The commitment put in place, has also led the Group to further structure its practices and processes, including introducing supporting Policies, in order to achieve increasingly relevant performance in this regard, to the point of becoming the first telco Group in the world to be included in the Top 100 of the Refinitiv D&I Index and to ensure its presence, for the third consecutive year, within the Bloomberg Gender Equality Index (GEI).

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

Achieving a work environment in which there are no distinctions of any kind, all physical and cultural barriers are broken down, and a culture of inclusion and valuing diversity is spread, is only possible if the Company has continuous moments of discussion with its stakeholders. The activities, in fact, of internal and external discussion with stakeholders make it possible to determine a widespread sensitivity on the topic and to collect different opinions, instances and ideas, which allow rethinking the initiatives aimed at inclusion and enhancement of diversity and to initiate projects that affect the areas in which deficiencies are detected.

This approach has enabled the Group to achieve very significant results, including the recent achievement of UNI ISO 30415 “Human Resource Management Diversity and Inclusion” certification.

## Community and stakeholder relations

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

The TIM Group - through communication mechanisms (reporting, systematic transmission of information related to corporate trends and performance), involvement and collaboration with its stakeholders - can generate impacts on local and non-local communities by supporting their development and fostering initiatives related to social, environmental and volunteer projects.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and

implementing initiatives to manage potential and actual negative economic, social and environmental impacts.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

TIM Group companies, insofar as they are fully integrated with the territory in which they operate and with the related social and economic-productive fabric, intend to contribute to the economic well-being and growth of communities, responding to the needs of the community, even in its weakest components, through communication, the development and delivery of services that are increasingly digitized and increasingly oriented toward fostering sustainable lifestyles, and support in the development of projects with a social-environmental impact.

The TIM Group has always stood out for its sensitivity and attention to the needs of society by also acting through its foundations. In particular, in Italy the Domestic BU introduced the TIM Foundation by promoting and spreading the culture of innovation through initiatives and projects that promote social inclusion, research and education, art and culture in all expressions, in ways and strategies that are in line with its statutory purposes and values.

In addition, the TIM Foundation pursues its mission through calls for proposals or by directly awarding grants, funding private and public nonprofit or religious entities, in line with the provisions of its Regulations.

BU Domestic also supports humanitarian, scientific, social promotion and environmental protection projects of Third Sector Entities, as well as those in support of national emergencies sponsored by the Civil Defense, by making

available solidarity numbers, such as solidarity text messages and landline calls, and by fully disbursing donated amounts to the sponsoring entities.

Regarding BU Brazil, the commitment implemented by TIM S.A. aims to promote the social inclusion of disadvantaged groups in Brazilian society, particularly children and adolescents, through the implementation of educational programs related to Science, Technology and Innovation (STI). In fact, Instituto TIM was founded with the goal of defining strategies and providing resources for the dissemination of science, technology and innovation to support community development in Brazil.

The TIM Group structures its activities on the continuous discussion and involvement of its stakeholders, both internal and external, communicating to them its environmental, social and governance performance through the publication of the Group's Sustainability Report, with a view to maximum transparency. Engaging them is considered essential in order to understand their views and achieve improvements with respect to the Organization's environmental, social and governance performance, aiming to maximize reputation and value.

With a view to constant involvement and collaboration with the Institutions, the TIM Group maintains a collaborative and transparent relationship with supranational, national and local Institutions, with the aim of facilitating dialogue on issues of common interest and ensuring proper representation of the Organization's position in Italy and Brazil, the main ones being:

- central national Institutions, such as Parliament, Government, Ministries and Public Administration;

- local Institutions and their representative associations;
- industry and non-industry authorities, such as AGCOM, AGCM, the Data Protection Authority, and the Energy Networks and Environment Regulatory Authority;
- authorities that oversee Brazil's ICT sector and market and legislation, respectively, such as ANATEL (Agência Nacional de Telecomunicações) and CADE (Conselho Administrativo de Defesa Econômica);
- European and international institutions such as, for example, the European Commission, European Council and Parliament, BEREC, OECD, UN, Global Compact, ITU and other UN agencies or programs, and other international platforms such as the G20;
- the Associations of the Confindustrial System, both central and territorial, and Trade Associations (ASSTEL and Anitec-Assinform) and Federazione Confindustria Digitale, with participation in intra-operator working tables.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

#### **[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

The TIM Group has carried out and continues to carry out specific actions aimed at managing actual positive impacts by virtue of its commitment to ensuring greater involvement and collaboration with institutions, better communication with its stakeholders, and the development of initiatives that can contribute to the economic well-being and growth of communities.

The most significant actions at the Group level include:

- provision of scholarships aimed at encouraging academic education and research;
- collaborations and constant partnerships with national and international Institutions in order to ensure continuous confrontation through presiding in working tables;
- definition of sustainable tools available to the community such as fundraisers through solidarity numbers to support individuals in need and emergency;
- constant dialogue with stakeholders in order to ensure proper and transparent ESG reporting to them (e.g., Sustainability Report), as well as provide results and awards received in this area (e.g., results of international rating agency assessments);
- presentation of the Group's industrial projects to the stakeholder community as part of the Capital Market Day. In this regard, the new Business Plan 2023-2025 was unveiled in February 2023, which defines financial and non-financial priorities for all business areas and operations, with the aim of providing stakeholders with vision with respect to the Group's future plans.

In relation to the initiatives carried out by BU Domestic, the main ones are listed below:

- disbursement of donations aimed at social inclusion, through educational and welfare initiatives dedicated to the least protected or otherwise disadvantaged categories and segments of the population, such as donations of large sums of money to the World Health Organization for the Health and Migration Program (PHM) for the health of migrants and refugees, or to the Policlinico Umberto I University Hospital for the implementation of the “Oncology 2022 Project”;
- awarding of calls aimed at scientific education and research, in the main fields of medical and natural sciences, economics and law, involving the provision of scholarships (Call “Studiamoci su”) and the allocation of money (Call “Ti-riuso mascherina!”) intended for Universities and Research centers;
- payment of donations aimed at artistic and cultural initiatives, for the protection and enhancement of the historical and artistic heritage, for the development of ways and forms of enjoyment and dissemination of knowledge of the heritage itself, and for the support of the world of culture, entertainment and music;
- fundraising through solidarity campaigns in favor of, among the main ones, scientific research initiatives and medical and social assistance;
- allocation of resources for extraordinary critical issues affecting the country in 2022.

With reference to the activity carried out by BU Brazil, TIM S.A. has implemented a series of initiatives aimed at managing actual positive impacts. The main actions are summarized below:

- collaboration with ANATEL in order to identify the most relevant issues and remove obstacles to the development of the sector, providing input into the evolution of key regulatory items such as frequency management, quality of service, network interconnection and sharing, rural coverage and the digital agenda;
- establishment and consolidation of the cooperative and transparent relationship with CADE;
- establishing training programs aimed at younger people in order to prepare them for the world of work and encouraging their entrepreneurial skills;
- launch of the book “Mathematics is freedom: the math circle and the circle of mathematics in Brazil,” in collaboration with UNESCO Brazil, with the aim of presenting the experiences accumulated by the Círculo da Matemática do Brasil project in schools in all regions of the country.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to keep track of the effectiveness of the actions taken by the TIM Group, which aim to generate real positive impacts on local and non-local communities,

the Organization has defined processes capable of quantifying the goodness of its initiatives.

In this regard, in fact, the Group has structured a series of processes that are translated both into measurement systems, through the monitoring of specific indicators, and into public performance reporting systems, through the publication of annual sustainability reports and assessments organized by prestigious rating agencies.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

As part of its own monitoring processes conducted by the Group in order to detect the effectiveness of the actions implemented to manage the positive impacts related to the topic, TIM monitors, for example, the economic magnitude and/or coverage and involvement of people within the initiatives carried out as a function of the efforts made through Fondazione TIM, in Italy, and Instituto TIM, in Brazil, as well as the number of solidarity campaigns activated by the Domestic BU and the collection, in economic terms, related to them.

In addition, in order to provide transparent and clear reporting of its ESG performance to stakeholders, the Group monitors certification by an independent third-party organization and subsequent publication of its annual Sustainability Report, and participation in assessments conducted by rating agencies and the subsequent obtaining of public ratings representative of its performance.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions taken by the Group in order to manage the actual positive impacts related to the topic can be demonstrated mainly by the following findings:

- as part of the initiatives carried out by the TIM Foundation, in 2022 the Organization disbursed about € 3 million in support of the projects undertaken, which highlight the significant commitment led by TIM in the development of initiatives aimed at ensuring support for communities. In relation, on the other hand, to the initiatives implemented in the course of its work by Instituto TIM in order to foster the development of Brazilian society and social inclusion, through them Instituto TIM has reached all 26 countries of the Brazilian states and the Federal District, involving more than 700,000 people to date;
- activation of more than 100 solidarity campaigns carried out during 2022, which ensured a total collection of about € 11 million, the funds of which were made available to support scientific research initiatives and medical and social assistance;
- obtaining certification of the Group's Sustainability Report 2022 by an independent auditing firm and publishing the same, demonstrating TIM's commitment to ensuring maximum transparency and quality in reporting to stakeholders on the Organization's ESG performance;
- participation in 2022 in numerous assessments conducted by international rating agencies, resulting in relevant ratings and entry into prestigious sustainability indices, such as:



- S&P Global, confirming its presence in the Dow Jones Sustainability Indices since 2013 for BU Domestic and since 2014 for BU Brazil, and achieving Top 10% S&P Global ESG Score recognition in the Sustainability Yearbook 2023 (BU Domestic);
- CDP (formerly Carbon Disclosure Project), achieving inclusion in the organization's "B-list";
- Moody's ESG Solutions, ranking first among telecommunications companies;
- Bloomberg, confirming its presence in the Bloomberg Gender Equality Index for the third consecutive year at the Group level;
- Refinitiv, confirming its presence in the Refinitiv Diversity & Inclusion Index and positioning itself once again as the leading company in Italy and South America in the TLC sector.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

Over the years, the TIM Group's commitment to ensuring clear and transparent communication to its stakeholders and to fostering the socio-economic development of the communities in which it operates has become even more evident through the increasing ESG disclosure activities it has put in place and the establishment and operation of its Non-Profit Organizations (TIM Foundation in Italy and Instituto TIM in Brazil), which have acted, and still act, to ensure greater sensitivity and attention to the needs of society.

The TIM Group, in fact, by virtue of its relevance in the sector and its market positioning, is aware that it has an important responsibility towards the community, since it is able to channel substantial resources, not only economic, towards projects and initiatives that contribute to the socio-economic well-being of the territories.

At the same time, the Group has realized that ESG topics are now a necessary area of disclosure to incentivize sustainable community development and progress; which is why, it has strengthened its ESG Reporting process over time, digitizing it and leading to an increasingly widespread involvement of its people. The same motivations, have also led the Group to take part in an increasing number of public sustainability assessments conducted by the world's leading rating agencies, ensuring clear and transparent outward reporting of its ESG performance.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The TIM Group annually conducts materiality analysis in order to incorporate stakeholder input into its sustainability priorities. In 2022, discussions with various stakeholders at the materiality stage revealed the increasing importance attached by Institutions and society at large to ESG indicators. In particular, it brought out how

the topic of community and stakeholder relations can have important feedback in terms of the TIM Group's positive impacts to the outside world.

In addition, ongoing discussion with the Group's stakeholders has proven to be crucial in order to pursue specific actions aimed at ensuring positive impacts on local and non-local communities. In fact, through continuous involvement and collaboration with them, the Group has been able to plan initiatives and monitor the progress of implemented actions aimed at communities.

Specifically, its presidium within important working groups that deal with topics close to both the Organization and the community has enabled the Group first to understand more clearly and comprehensively the needs of the community, and then to make their implementation possible through the development of calls for tenders and the provision of donations and economic resources capable of following up on its social commitment.

## Resilience to physical, public health, and sociopolitical risks

### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM can generate impact through useful activities to address major public health risks (including the spread of infectious diseases and possible pandemics), life-threatening noncommunicable diseases, and natural and human-induced disaster events.

### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and implementing initiatives to manage potential and actual negative economic, social and environmental impacts.

### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group has among its founding values the protection of human resources inside and outside the Organization, the safeguarding of the value of its own and third parties' tangible and intangible assets, and the continuity and quality of telecommunications services.

The communications network has always been a strategic infrastructure for the social and economic fabric; as such, it is interdependent on other critical infrastructures. Communication services are, in fact, essential services for

a community, and they become even more so in the emergency phase; for this reason, TIM is called upon to be part of any Crisis Units activated at the institutional level. Therefore, the Group prepares and maintains an efficient Crisis Management System aimed at preventing a state of emergency/crisis and, where not possible, managing and overcoming it as best it can.

The TIM Group's Crisis Management System is aimed at:

- contain direct and indirect tangible and intangible damage caused by exceptional adverse events on corporate resources (human, tangible and intangible);
- to guarantee, as much as possible, essential telecommunication services to stakeholders in emergency situations;
- to quickly restore ordinary processes and functionality of TLC infrastructure;
- to contribute to the sustainability of the Group.

The protection of communities and tangible and intangible resources, is also realized through the management of the plurality of risks so-called “non-competitive”, to which they are exposed. These risk scenarios are constantly evolving, due in part to, for example, the effects of climate change, cybersecurity threats, terrorism phenomena, and, more broadly, national and international socio-political events, and must be managed, to the extent possible, through positive-impact strategies, processes, and actions.

The “Group Policy for Crisis Management” defines responsibilities, processes, organizational and managerial dynamics that must be activated during emergencies/crises, in order to plan and apply suitable methodologies and techniques to cope, in a very short time, with events of high severity, minimizing their consequences, including the long-term ones, highlighting the Group's resilience to non-competitive risks. This Policy applies to:

- defense and civil defense emergencies/crises (e.g., natural disasters, man-made or accidental accidents, terrorist attacks, health emergencies), and is supplemented on these aspects by the provisions of the Civil Defense Organizational Procedure;
- emergencies/crises involving employees abroad (e.g., natural disasters, kidnapping, epidemics, pandemics, sabotage, war, terrorism);
- cybersecurity emergencies/crises, brought about by significant failures and malfunctions, including those induced by malicious actions.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including**

**[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

### **[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

In carrying out its activities, the TIM Group has identified specific actions aimed at managing the actual positive impacts associated with the material topic. The following are the main ones:

- adoption of a detailed organization model, with provision for specific actors:
  - the Crisis Management Committee (CMC), which establishes emergency/crisis management strategies;
  - the Operational Crisis Teams (OCTs), in charge of the operational coordination of management activities for different types of critical events and emergencies/crises, whose composition is kept constantly updated following internal organizational evolutions;
  - the Corporate Representative to Institutions;
- initiatives aimed at ensuring ongoing training, through the organization of refresher courses on crisis management issues; participation in exercises organized by institutions on specific risk scenarios; and dissemination, through communication campaigns, of a culture of protection and resilience;
- continuous updating of emergency planning, in relation to evolving risk scenarios and national planning issued by relevant national and local Institutions, so that it can be immediately applied in the management of unpredictable events occurring in ever-changing contexts;
- establishment of numerous Security, Network and Other Operations Centers intended to collect h24 reports on the status of infrastructure and operation of

services. Specifically, the Security Control Room (within the Chief Public Affairs & Security Office/Physical Security) is the unified collection and monitoring center for all reports of critical events and emergencies/crises;

- integration of climate change risks within the Group's risk matrix so that these are monitored, prevented and mitigated. Examples may be physical hazards related to rising temperatures causing extreme and unexpected atmospheric precipitation, landslides, floods or overflows, and transition hazards, with reference to BU Domestic; other examples related to physical hazards, concerning BU Brazil, are inherent in water shortages, storms and cyclones.

### **[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

#### **[GRI 3-3e.i] “processes used to track the effectiveness of the actions;**

In order to foster the continuous improvement of the practices adopted by the Group in managing the actual positive impacts generated with respect to the material topic, TIM monitors the effectiveness of its actions taken through specific processes that detect their quality in achieving the Organization's objectives, through the use of performance indicators. The same goals are also pursued through the processes aimed at obtaining relevant certifications for the highest impact sites from independent third parties (e.g., ISO 14001, ISO 27001, ISO 45001).

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

The Group's goal is to align itself with the provisions contained in the relevant regulations by addressing, through its positive impact actions, the main risks to public health, events related to natural disasters and socio-political phenomena, bringing value in this regard and fulfilling any requests received by the Company from institutions, especially during emergencies. Furthermore, in order to positively impact climate change by contributing to national and supranational climate change targets, the Group has taken on the ambitions of becoming Carbon Neutral (Scope 1+2) by 2030 and Net Zero (Scope 1+2+3) by 2040, making its contribution to averting the occurrence of natural disasters.

To this end, the TIM Group monitors a number of useful indicators to assess progress in this regard:

- obtaining certifications that increase the Group's resilience to socio-political, public health and climate-related risks;
- the number of requests, if any, received from institutions and then fulfilled;
- amount of total Group emissions (Scope 1+2 and Scope 1+2+3).

In addition, in case of emergencies, the heads of activated OCTs monitor the actions taken during the management of the specific emergency and share their results with other facilities, including in the post-emergency period in order to improve planning.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the efforts and actions put in place by the TIM Group is proven:

- in the achievement, within the Domestic BU, of ISO 14001, ISO 27001, and ISO 45001 certifications and, within the Brazil BU, of ISO 14001 and ISO 27001 certifications, which increase the degree of resilience of the Group's relevant management systems;
- in the 15% decrease in the Group's total Scope 1 + Scope 2 emissions (vs 2021);
- in the 13% decrease in the Group's total Scope 1 + Scope 2 + Scope 3 emissions (vs 2021).

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

Within the Crisis Management cycle, which consists of 4 phases (planning, pre-emergency/crisis, emergency/crisis, and post-emergency/crisis), the activities and studies conducted by the actors assigned to ensure the management of crises and emergencies in the Company have led the Group to give increasing attention to the planning (or re-planning) phase aimed at analyzing the findings of emergency/crisis management and improving the processes of the Crisis Management System. In addition, with the aim of speeding up the operation and synergy of the actions deployed among the corporate functions involved, the Group has agreed on the adoption of digital modes of organizing OCT meetings.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

Cooperation with institutions, both in the so-called “ordinary time” (also called “peacetime”) that in times of crisis, allows the Group:

- at the planning stage, to continuously improve the company's emergency plans, aimed at predicting and preventing, where possible, risk scenarios and preparing for their management, and to know and meet the needs of stakeholders, positively impacting the topic;
- during TIM's participation in national and local exercises organized by institutions, to test and improve the response of TIM's Crisis Management System to different types of emergencies;
- to facilitate, in the emergency phase, the synergy of interventions of all actors, public and private, operating in the activated Crisis Units.

Results useful for the improvement of the Crisis Management System are shared with the Crisis Management Committee and Operational Crisis Teams, who participated in the emergency management, through post-emergency and post-exercise debriefings conducted both within the Company and within the institutional tables activated.

Significant results for the entire Group are also shared with stakeholders through internal communication initiatives. Some of these initiatives are also aimed at supporting communication campaigns promoted by institutions and aimed at

increasing awareness of risks and developing a culture of prevention among citizens, creating shared value in this regard.

Finally, entering into agreements, partnerships and conventions has improved the processes of service delivery required by Institutions.

## Sustainable supply chain

**[GRI 3-3a] Describe the actual and potential, positive and negative impacts on the economy, the environment, and people, including impacts on their human rights**

TIM - through the activities of qualification, management of purchase requests and tenders, formalization and execution of contracts, and performance evaluation of its supply chain - can reduce the ESG impacts generated by its suppliers. In addition, procurement activities that employ local resources can stimulate economic growth and development while generating social, business and employment opportunities for local residents.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the actual positive type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it

should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the prerequisites for planning and implementing initiatives to manage potential and actual negative economic, social and environmental impacts.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The relationship and activities carried out with suppliers are governed by the Purchasing Policy for Products and Services, with the aim of governing the management of ESG topics within supply relationships, generating positive impacts on people and the environment.

The document, which can also be consulted and downloaded from the institutional website [www.gruppotim.it](http://www.gruppotim.it), helps guide the Group's purchasing policies in favor of products and services that have a low environmental impact, and that take workers' rights into account in their production and delivery.

In this regard, the Policy governs the Group's commitment to take into account and manage the environmental, social and economic impacts arising from its activities in its close relationships with its suppliers. In fact, the TIM Group's purchasing process is aimed at ensuring the procurement of products and services in line with the needs and timing appropriate to carry out its activities, ensuring the optimization of the overall cost and, at the same time, the

requirements of quality, safety and environmental protection of the products/ services purchased, in compliance with the current regulatory and procedural framework. Specifically, the process is implemented through the comparison of technical/economic bids from qualified suppliers, according to Group-wide company procedures that are based on, among other things, negotiating ethics, regulations and sustainable aspects.

In addition, TIM is committed to encouraging suppliers' continued pursuit of innovative technological solutions in the area of environmental sustainability, as well as social and economic sustainability, by promoting best practices and duly taking them into account in the Vendor Rating methodology.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i, d.ii] actions to prevent or mitigate potential negative impacts; / actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;**

(See point b)

**[GRI 3-3d.iii] actions to manage actual and potential positive impacts**

In the area of supply relationships, the TIM Group deploys a series of specific actions aimed at managing them virtuously and in line with best practices, generating positive impacts. The main ones are explained below:

- actions to encourage and engage suppliers to develop a proactive approach to



sustainability issues and provide sustainable solutions;

- actions involving collaboration with the same suppliers in order to determine more relevant collective ESG performance;
- actions to identify and review risks and impacts on sustainability, of purchased products and services;
- integration of sustainability topics within tender documents by ensuring that these are a proportionate part of the evaluation criteria for significant impact procurements, where applicable;
- development of practical tools to increase awareness, knowledge and understanding of relevant sustainability issues;
- promotion, within supplier relationships, of solutions that enable significant reductions in GHG emissions in the supply chain;
- collaborative initiatives with suppliers/partners to lower the risk of security incidents on all activities performed, with the desirable goal of zeroing them out;
- actions to promote fair labor practices among providers, including non-discrimination.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to monitor the effectiveness of the actions taken and principles adopted, with which suppliers must comply, the Group has established monitoring

processes that examine different specific indicators and evaluation/control of the economic operators with which it has supply relationships.

In particular, TIM conducts audits of suppliers, either directly or through external bodies, including in cooperation and through agreements with partners or other operators active in the telecommunications sector, such as within the framework of the Joint Audit Cooperation - JAC initiative (<http://jac-initiative.com>) of which TIM is a founding member. JAC is a collective of telecommunications companies that aim to promote safe and fair working conditions and responsible business, social and environmental management. If the checks yield negative results, appropriate corrective measures are taken in accordance with the provisions of the contracts to ensure that the sustainability requirements set out in the JAC guidelines and protocol are met, ensuring continuous performance improvement in this regard.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

As part of its environmental ambitions impacting the supply chain, the Group has taken on the Scope 3 emissions reduction target of 47% (categories 1, 2 and 11 GHG Protocol - 2019 baseline) by 2030. In order to assess progress against the same target, TIM monitors the amount of indirect emissions generated within the supply chain, specifically, through purchased products and services (GHG Protocol category 1) and purchased capital goods (GHG Protocol category 2).

In addition, the TIM Group monitors a number of additional indicators useful for assessing progress against its sustainable sourcing practices, including:

- the proportion of spending to local suppliers, at the BU Domestic and BU Brazil levels;
- the percentage of new suppliers evaluated according to environmental/social criteria;
- the number of audits conducted on the supply chain under the Joint Audit Cooperation (JAC) project;
- the percentage of new qualified suppliers in Italy who have signed the principles of the Group's Code of Ethics and Conduct.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions implemented by the TIM Group for the purpose of sustainable management of its supply chain is demonstrated through the results achieved during the period, including:

- 13% decrease (vs 2021) in Scope 3 emissions attributable to the Group's supply chain (GHG Protocol categories 1 and 2);
- 93% (+2% vs 2021) of BU Domestic's total order is made locally. The figure for BU Brazil is 98.8% (+0.8% vs 2021);
- 100% of new suppliers in the Domestic BU were evaluated according to environmental criteria;
- approximately 38% increase (vs 2021) over the number of audits conducted under the JAC project;
- 100% of new suppliers in the Domestic BU have signed up to the principles contained in the Group's Code of Ethics and Conduct.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

In carrying out its business activities, the TIM Group has become increasingly aware of how crucial it is to define a collaborative relationship with its suppliers and partners marked by sustainability values and practices in order to achieve continuous improvement in the purchasing process. In fact, the supply chain is considered an integral part of the business, whose actors play a crucial role in creating value both inside and outside the Organization.

With this in mind, TIM in 2022 became a value chain Partner of the Open-es alliance, which through a platform and ESG assessment system based on international standards, provides analytical tools to create a sustainable development ecosystem. At the end of 2022, there are 921 TIM suppliers registered in the platform, 360 of which belong to the ESG risk market.

TIM has also gradually introduced sustainability parameters at the line request phase and in tenders where, if applicable, a sustainability grid is included alongside the technical and economic one with a weight of up to 10%.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The Organization carries on an ongoing discussion with its stakeholders in order to understand their expectations with respect to the principles and good practices to be put into practice in the context of supply relationships.

This comparison has led the Group, over time, to define and update its policies governing procurement in a sustainable manner, summarized in the Product and Service Purchasing Policy, adjusting the Company's internal processes.

Confrontation with the market and increasingly demanded ESG requirements in tenders is leading to the incorporation of ESG criteria in supplier selection and in the choice of products/services to be purchased.

Finally, the discussion with stakeholders that took place as part of the 2022 materiality analysis highlighted the importance of the positive impacts generated by the Group through its sustainable sourcing practices, consequently confirming the goodness of the path taken in this regard, and further orienting the Company's focus toward the challenges of sustainable development that characterize supply chains.

## Human rights defense

### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

TIM's activities can have an impact on human rights, especially along the value chain. In particular, such impacts could involve violations of basic human rights, as well as legal rights and labor relations principles, and could affect freedom, dignity, equality and justice.

### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The TIM Group could contribute to the negative impacts both directly, through its own activities, but especially indirectly along the entire value chain, with particular reference to the supply chain, which includes, among its main business relationships, relationships with companies operating in manufacturing, services, and content producers.

### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group operates in full compliance with the relevant regulations to which it is subject in all the countries in which it operates, striving to prevent any human rights violations that might occur in the conduct of its operations and mitigating the associated potential negative impacts. The human rights identified by TIM include not only human rights common to all industries, such as respect for the right to fair remuneration, non-discrimination, no use of forced/compulsory/compulsory labor, etc., but also human rights peculiar to a telecommunications company, such as the right to access information, freedom of expression (especially online expression), protection of privacy and online safety, and protection of children (e.g., from cyberbullying).

In this regard, the Group's commitment to the respect and protection of human rights and labor standards is set forth in the Code of Ethics, in which document the prohibition is enshrined with respect to any form of discrimination or harassment,

whether based on sex, sexual orientation, race, ethnic origin, citizenship, language, religion, political or other opinions.

This principle is reiterated in all relevant Group Policies on the subject, first and foremost the Human Resources Policy in which not only all forms of discrimination but also harassment or bullying are condemned. More specifically, as part of the Human Rights Policy, the TIM Group defines its commitment to becoming a promoter of the same rights and a proactive leader in initiatives and networks concerning them, both nationally and internationally.

These reasons led the Group, in 2002, to become a signatory to the UN Global Compact, constantly encouraging its partners to commit to the protection of human rights through the adoption of specific international Declarations and Guidelines (e.g., the UN International Bill of Human Rights; the Declaration on Fundamental Principles and Rights at Work, issued by the International Labor Organization (ILO); the ISO 26000 Guidelines for private and public organizations of all sizes, etc.).

As a further demonstration of its commitment to the topic, TIM in Italy also introduced, in May 2021, the Policy Management of incidents of gender, sexual and bullying harassment, which enshrines the complete non-tolerance of behaviors assimilated to this type of episodes, through awareness-raising and training activities regarding both the functioning of the Policy itself and the tools for preventing and managing harassment, guaranteeing protection and privacy to possible victims.

Finally, the Group is one of the founders and active participants in the local Global Compact Italy and Brazil Networks and the Joint Audit Cooperation (JAC), an ICT sector-specific initiative that aims to raise human rights-related standards along the supply chain.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

In order to prevent or mitigate potential negative impacts related to the topic of human rights advocacy, the TIM Group has undertaken a number of initiatives and actions over time, such as:

- the adoption of a comprehensive body of legislation to support the topic, updated and supplemented over the years, including policies, principles and ways of handling human rights issues;
- the implementation of a human rights due diligence process, concluded in 2014, through the involvement of the Group's two main entities in terms of headcount and investments, namely BU Domestic (the percentage covered was 98%, as it did not include the companies Olivetti and TIM Sparkle) and BU Brazil. In 2021, TIM S.A. conducted a new self-assessment on human rights, based on the Human Rights Capacity Diagnostic (HRCDD) questionnaire of the Global Compact in order to verify the level of engagement and management of the topic, and in December 2022, launched a new due diligence process on human rights;

- adoption of reporting processes with respect to possible violations (Whistleblowing);
- with reference to the topic of harassment, adoption at the Domestic BU level of external support pathways preparatory to reporting and activated directly by the person concerned without intermediation by the Company:
  - person of Trust: a professional figure outside the Company to whom one can turn when one feels the need to have an opinion on what happened or to understand how to interpret incidents and how to behave;
  - legal Advice Service: provided by attorneys and/or experts from outside the Company to whom the victimized employee can turn for discussion on the legal relevance of the incidents of which he/she has been a victim and/or the legal tools available to him/her;
  - TIM's Citizens Psychological Desk: the telephone psychological desk service offers support to men and women anonymously and confidentially.

In addition, the human rights (in)formation path has been launched in Italy, which is a digital tour that aims to expand knowledge with respect to the same rights, consisting of seven stages at the end of which you have all the necessary information on what to do in case you suffer a violation of one of the human rights or witness it.

On the other hand, as far as the Brazil BU is concerned, TIM has implemented the “Respeito Gera Respeito” (Respect begets Respect) program, which aims to combat all forms of violence, bullying and all types of harassment through

monthly trainings for employees aimed at spreading a culture based on respect. In addition, a partnership with Instituto Avon, the company that developed “Angela,” a WhatsApp chatbot that helps Brazilian women in situations of violence, was finalized, and membership in the Coalizão Empresarial Pelo Fim da Violência Contra Mulheres e Meninas, an important business movement fighting against gender-based violence, was established.

**[GRI 3-3d.ii, d.iii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; / actions to manage actual and potential positive impacts**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the potential negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at dealing with actual negative spillovers or bring about positive economic, social and environmental impacts.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to ensure respect for fundamental human rights, the TIM Group has specific processes in place to monitor the degree of maturity of the practices and policies that the Organization deploys with respect to the topic.

In fact, periodically, it is planned to conduct an internal due diligence process carried out on the basis of the Guiding Principles on Business and Human Rights, approved by the UN Human Rights Council in June 2018, with the aim of:

- identify human rights risks associated with the Group's activities;
- confirm that each human rights-related topic is governed by an appropriate internal regulatory framework, has a management system that monitors and tracks performance regularly, and has relevant responsibilities assigned;
- define a path for improvement of its activities.

In addition, the TIM Group has adopted a process for monitoring reports from both internal and external sources (Whistleblowing), and conducts periodic monitoring processes through measurement systems that consider particular performance indicators.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In line with the principle that Freedom, Justice and Peace are at the foundation of

the Organization, the TIM Group's ambition is that no incidents of human rights violations occur throughout the value chain.

In this regard, in order to assess the effectiveness of the actions put in place by the Group with respect to the defense of human rights and evaluate the progress made, TIM monitors specific indicators, including:

- the number of complaints received regarding any incidents of discrimination;
- the number of new suppliers who have signed up to the behavioral principles contained within the Group's Code of Ethics and Conduct.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions taken can be demonstrated through the results achieved by the Group, including:

- low number of complaints received compared to incidents of discrimination;
- in 2022, 100% of new qualified suppliers in Italy have committed in writing for themselves and on behalf of any authorized subcontractors, collaborators and employees to observe the behavioral principles of the Group's Code of Ethics and Conduct.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

In the course of carrying out its business activities, the TIM Group has become increasingly aware of how crucial it is for the TLC sector to ensure the defense

of human rights, by virtue of the fact that, among others, it is through the accessibility of new technologies that situations can arise in which the right to privacy and the protection of personal data, the right to freedom of expression, the failure to protect minors from adult content, and the occurrence of incidents of harassment are not respected.

This awareness has led TIM to define, as part of its Policy dedicated to human rights, a broader meaning of the term “human right,” which goes beyond “basic” human rights, and considers the specificity of the Group's business, including, therefore, the right to access to information, freedom of expression (especially online), the protection of privacy and online safety, and the protection of minors (e.g., cyberbullying).

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The feedback gathered from stakeholders as part of the due diligence process conducted by TIM (concluded in 2014), highlighted the need to prepare a TIM Group Human Rights Policy (about 2/3 of the insufficient self-assessments concerned this aspect), leading the Group to prepare a document on the subject. In addition, in 2022, the discussion with stakeholders that took place as part of the materiality analysis enabled the TIM Group to identify the topic of defending human rights as a material topic, despite the fact that the Organization operates in countries with a low/medium risk of human rights violations and in a particular

sector such as telecommunications, leading the Group to increasingly place people at the center of its strategies and to guarantee them a work environment in which the protection of fundamental rights is guaranteed and encouraged.

### Cyberbullying, child pornography, online gambling

**[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

Through its activities, TIM handles a large amount of sensitive data, which could give rise to exploitation, abuse or harmful practices, considering the increasingly prevalent phenomena of internet bullying, child pornography and online gambling.

**[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The Organization could be involved in the negative impacts in the operation of its core activities.

**[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group, as part of its activity carried out within the ICT sector and in full compliance with current regulations, is constantly committed to combating any episodes of cyberbullying, child pornography and online gambling, providing



customers with a series of tools to protect minors from access to sensitive content offered, and providing constant updating and related communication.

In this regard, because of the aforementioned commitment to preventing harmful practices in this area, the Group has expanded the definition of human rights within its Human Rights Policy to also cover all areas concerning children, such as cyberbullying.

As a further demonstration of its commitment, BU Brazil has decided to join the cooperation agreement against pedophilia with SaferNet and other entities/companies, taking on the task of combating and preventing crimes committed through the Internet; at the same time, in Italy TIM is active in Working Groups in the OECD and B20, also participating in multiple institutional tables, such as “Alliance to better protect minors online” launched by the European Commission.

In addition, in relation to its activities in Italy, TIM has introduced, from an organizational point of view, the role of “Referent for the Postal Police,” included in the Security Operations Center (SOC) Function within the Public Affairs & Security Office. This figure is in charge of managing relationships and information flows with the Postal Police and relevant authorities and coordinates, within TIM, the abuse management process. The introduction of this figure, moreover, demonstrates BU Domestic's willingness and commitment to deploy all resources, technologies, processes and tools aimed at preventing and counteracting any type of activity that could result in a violation of behavioral and legislative rules governing the use of network services and/or information systems, such as abuse.

TIM offers adult content services, and as a child protection measure, users wishing to access the content provider's web portal must declare that they are of legal age, via a disclaimer with a password to restrict access to minors.

In addition, BU Domestic is an active member in the Advisory Board of the Safer Internet Centre (SIC) - Generations Connected, through which the Company intends to raise awareness of young people belonging to the age groups most at risk of cyberbullying.

Lastly, in relation to gambling, the TIM Group manages the topic by ensuring constant alignment with the regulations and monitoring their evolution over time, such as the transposition by the Domestic BU of the requests of the Customs and State Monopolies Agency (AAMS), in compliance with Law 296/2006 art.1 co.50 relating to the fight against tax evasion and avoidance in the gaming sector, with the aim of proceeding to block the reported resources, making them inaccessible to its customers.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

In order to prevent or mitigate the potential negative impacts related to the topic of cyberbullying, child pornography, and online gambling, the TIM Group has undertaken a number of initiatives in this regard, the main ones of which are listed below:

- integration within the Organization's body of law of principles and practices pertaining to the main aspects related to the material topic (as, for example, for the topic of cyberbullying within the Human Rights Policy);
- development of a web address filtering system so that access to any sites deemed unsafe can be prevented;
- participation internationally in initiatives that aim to improve technologies, policies and communications aimed at minors in ways that provide greater protection for these users in the context of online browsing.

In relation to the actions carried out by the Domestic BU, the main ones are listed below:

- ban on the use of adult services on all TIM Cards in the name of minors;
- development of the TIM Navigazione Sicura APP installable application on smartphones or PCs, featuring parental control, anti-theft and anti-virus functions to ensure customers are protected from threats on the web and offer greater security when browsing online;
- definition of the TIM Safe Web Plus “mobile” service, which includes a system of filtering unsafe addresses through DNS (Domain Name System) and, if the site is deemed malicious, the browser redirects the user to a protection page that warns him about the dangerousness of the same, making it inaccessible;
- encouraged the development of younger people's awareness on the issue of cyberbullying by presiding over the period at the “Biennale Democrazia”, a cultural event sponsored by the City of Turin, with the panel “Cyberbullying: knowledge is power”.

- introduction of the system aimed at obscuring and making foreign websites (filtering), previously reported by the Postal Police through the CNCPO (National Center for the Contrast of Online Child Pornography), inaccessible to its customers, in line with the Implementing Decree of Law 38/2006 (Gentiloni Decree);
- developed the implementation of the requests of the State Customs and Monopolies Agency (AAMS), in order to ensure the blocking of the reported resources and make them inaccessible to its customers, in compliance with Law 296/2006 art.1 co.50 on combating tax evasion and avoidance in the gambling sector;
- introduction of a reporting form on TIM's institutional and commercial channel, which can be used by both TIM customers and external users, to report any child pornography, computer crimes (e.g., spam, viruses, Malware) encountered while surfing the Internet;
- definition of the Abuse Desks, abuse management groups differentiated by type of service, aimed at collecting reports from external users/clients on alleged computer malfeasance or the presence of child pornography material on the Organization's networks, and then directing them to the relevant function with the possible involvement of the Authorities concerned.

On the other hand, with regard to actions put in place by BU Brazil, TIM, in continuity with previous years, has implemented appropriate filtering services for adult content - such as downloading images, wallpapers, streaming videos, audio content (podcasts), and erotic information via text messaging - delivered in Brazil;

therefore, customers can access this content through the provider's web portal, only after declaring that they are of legal age. In addition, TIM limits its adult-only content portfolio to level 3,2 of the international classification (international code).

**[GRI 3-3d.ii, d.iii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; / actions to manage actual and potential positive impacts**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the potential negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at dealing with actual negative spillovers or bring about positive economic, social and environmental impacts.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to ensure the fight against phenomena attributable to cyberbullying, child pornography and online gambling, and to enable safe browsing where threats from the web are minimized, the TIM Group has equipped itself with specific processes, in terms of monitoring systems for its initiatives, by means of punctual indicators, which allow it to evaluate and keep track of the effectiveness of the actions taken.

With particular reference to abuse, the Domestic BU has defined processes aimed at keeping track of any reports to be forwarded to the Postal Police; in fact, in the event that the reporting process is activated by users/customers, TIM has provided for the involvement of the relevant Abuse Desks and, where necessary, also the Legal functions.

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

In order to assess the effectiveness of actions put in place with respect to preventing and mitigating any negative impacts related to the topic of cyberbullying, child pornography, online gambling, the Domestic BU voluntarily monitors specific indicators, including:

- number of botnets, malware and phishing blocked, in order to ascertain how well the TIM Navigazione Sicura APP application protects against new web threats;
- number of users who are users of the TIM Safe Navigation APP.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions taken, which demonstrate TIM's willingness to offer increasingly secure browsing to its users, can be demonstrated through, for example, the recording in Italy, in the period from January 2022 to February 2023, of 137 million blocked botnets, 1.6 million blocked malware, and finally 688,000 blocked phishing, a condition that underscores the efficiency of the TIM Navigazione Sicura APP application in protecting against online threats and TIM's ability to adopt adequate protection of its customers' data.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

By virtue of its important role in the telecommunications industry and in the countries in which it operates, the Group has become increasingly aware of the need to ensure safe browsing for its users and to monitor content that minors may have access to so that it does not affect their mental and physical development. This awareness has led the Organization, over time, to put forth a major effort in order to increasingly ensure the prevention of such phenomena as online bullying, child pornography and gambling.

In particular, with reference to the operational activities carried out in Italy, TIM has not only expanded the range of services to which customers can resort and implemented increasingly innovative systems aimed at ensuring protection from web threats and blocking access to dangerous sites, but at the same time it has also encouraged the structuring of processes aimed at keeping track of and managing the reports received from customers using the TIM network in the event of cybercrime.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

Continuous discussion with stakeholders was found to be of primary importance in the introduction of a figure within the Organization capable of handling relations with the relevant Authorities.

In fact, ongoing collaboration with institutions that actively work to counter the phenomena of cybercrime and online child pornography has led to the identification of a specific figure with the goal of managing relations with the Postal Police and relevant authorities and information flows in a continuous and effective manner.

Moreover, in continuity with previous years, the discussion with the Group's stakeholders that took place during the materiality phase noted the importance of the impact related to the topics of cyberbullying, child pornography, and online gambling, guiding the actions taken and providing guidance for future ones as well.

## Circular economy and waste production

### **[GRI 3-3a] Describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights**

Substances or products used or disposed of by TIM during their life cycle may pose a threat to human health or the environment. The generation, processing, as well as the management, storage, and use of hazardous materials can have significant environmental impacts.

### **[GRI 3-3b] Report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships**

The TIM Group could contribute to the negative impacts either directly, through its own activities, or also indirectly by means of the impacts recorded throughout the value chain, with particular reference to the supply chain that includes, among its main business relationships, relationships with companies operating in the manufacturing, service, and content producers sectors.

### **[GRI 3-3c] Describe its policies or commitments regarding the material topic**

The TIM Group strongly believes that the socio-economic progress of the territory also passes through the definition of procedures and processes increasingly oriented to ensure efficient use of resources and products, enhancing the reuse and recycling of materials. In fact, the Group promotes goods and services

designed and manufactured with a view to eco-sustainability and practices of reuse and recycling of materials and products, from the choice of raw materials to their disposal, taking care of the aspects of eco-compatibility and proper finance management.

In addition, the TIM Group's environmental impact is related not only to purely energy consumption, but also depends on its ability to intervene with recycling, reuse and repurposing activities so that resources are not turned into waste. With this in mind, in Italy TIM is committed to managing waste production not only by complying with current regulations and adopted standards, but also by implementing a series of commitments and actions aimed at both minimizing the volume of materials produced and encouraging their reuse in the form of goods or materials, in a circular economy logic.

The Domestic BU, with reference to its supplier selection and purchasing practices adopted, in order to support the circular economy, has established both a selection practice based on their sustainability performance and policies for tracking, sorting, recovery and resale of industrial waste. In addition, in Italy TIM has included in tenders and contracts requirements related to specific internationally recognized certifications.

The commitment of the Domestic BU with regard to the material topic is evidenced not only by the choice to evaluate the purchase of products following specific eco standard guidelines and by the constant reuse of all goods and materials already available in the Company, but also by the donation of what, on the other hand, can no longer be used.

In addition, in order to go beyond the normal transposition of regulations in the management of topics related to the circular economy and waste generation and generate value in this regard, some functions and/or companies in the Group with a significant impact on stakeholders have achieved certifications in line with ISO 14001.

**[GRI 3-3d] Describe actions taken to manage the topic and related impacts, including:**

**[GRI 3-3d.i] actions to prevent or mitigate potential negative impacts;**

During 2022, BU Domestic took multiple actions aimed at preventing and mitigating potential negative impacts associated with waste management. The following are the main ones:

- creation of dedicated areas for separate waste collection;
- raising staff awareness for reducing waste production and disseminating practices related to waste separation in the offices, including through the provision of dedicated posters sharing virtuous behaviors to be adopted (“The 10 Habits for a Sustainable Office”);
- initiation of a path of valorization of decommissioned materials through resale of equipment through specialized brokers, reuse and sale of recyclable materials such as network systems, copper boards and cables, and finally through donations to interested non-profit organizations. In the latter case with special reference to depreciated furniture and hardware;
- promotion of projects aimed at encouraging the transformation of technological waste into secondary raw materials;

- negotiation and acquisition of products exclusively in accordance with the NW.T technical specifications, i.e., made with criteria that ensure the recyclability of the product and packaging, providing for them in each technical document, as well as products that do not fall under the case of hazardous materials for users;
- introduction of specific requirements within the selection tenders of specialized waste management companies, such as recovery rates;
- definition of environmental Protection clauses and consequent introduction of the same in all contracts with which associated the right of TIM to terminate the same in case of failure to comply with even a single obligation, pursuant to art. 1456;
- introduction in tenders and contracts of specific requirements regarding possession of ISO 14001 and EoW (End of Waste) certifications, with associated recycling report.

**[GRI 3-3d.ii, d.iii] actions to address actual negative impacts, including actions to provide for or cooperate in their remediation; / actions to manage actual and potential positive impacts**

Downstream of the materiality analysis, it was found that the main impact related to the material topic is of the potential negative type. For this reason, disclosure was provided solely with respect to the management of this type of impact. However, it should be specified that the TIM Group, in order to ensure transparency and fairness in business management to its stakeholders, has established a solid internal control system, consisting of rules, tools, activities, procedures and

organizational structures. In this regard, as part of its risk management system, the Group has adopted an Enterprise Risk Management model capable of identifying potential events that may affect its business activities, including the plurality of ESG risks, enabling it to create the conditions useful for planning and implementing initiatives aimed at dealing with actual negative spillovers or bring about positive economic, social and environmental impacts.

**[GRI 3-3e] Report the following information about tracking the effectiveness of the actions taken:**

**[GRI 3-3e.i] processes used to track the effectiveness of the actions;**

In order to track and monitor the effectiveness of the actions taken with respect to topic related to the circular economy and virtuous waste management, TIM in Italy has identified different types of processes falling within both its own operations carried out and within the incoming quality control processes, as well as in the specific certifications acquired, including with reference to the Brazil BU (e.g., ISO 14001).

**[GRI 3-3e.ii] goals, targets, and indicators used to evaluate progress;**

BU Domestic sets goals annually from previous years' results, monitoring and encouraging their continuous improvement. In this regard, TIM in Italy periodically observes the progress of the actions taken and their quantitative effects on the indicators of effectiveness, monitoring the volumes of waste generated and the

value of waste and equipment valued, as well as through summary indicators of process efficiency.

The TIM Group's 2023-2025 Business Plan includes among its pillars the spread of the circular economy model, the reduction of waste generated and the reuse of materials. With these aims in mind, the same Plan defines environmental targets at the Group and Domestic BU levels, with the latter having the ambition by 2025 to reach a  $\geq 70\%$  share of “green” products and smartphones and to raise, also in the same period, the Circular Economy Ratio<sup>(5)</sup> to 2€/kg.

Furthermore, in Italy TIM observes additional indicators that allow monitoring the degree to which it is making good progress against its circular economy and waste generation goals and targets, such as the ratio of remanufactured material to new material and revenues related to the resale of technological waste, in addition to the percentage of recyclability, as well as EoW (End of Waste), at the Group level.

**[GRI 3-3e.iii] the effectiveness of the actions, including progress toward the goals and targets;**

The effectiveness of the actions put in place by the Group can be demonstrated through:

- the decrease of about 10% (vs 2021) in the tons of waste generated;
- the recyclability rate of 93% in 2022;
- the value recorded in 2022 with respect to the Circular Economy Ratio of 0.3 €/kg;
- 60% share of smartphones and green products.

(5) Unit revenue from resale of used materials and goods and waste recycling per kg of waste generated. Baseline 2021 €0.04/kg.



In addition, TIM in Italy in 2022 found a strong increase in the valorization of waste and discarded materials, nearly tripling revenues from the resale of technological waste compared with the previous year, as well as optimizing the sale of equipment through brokers and discarded copper cables. Specifically, in the Domestic BU, the Network Function valorized about 1,500 tons of technological waste and earned a total of about 2 Mln€ from waste recovery and the sale of equipment through brokers and decommissioned copper cables.

**[GRI 3-3e.iv] lessons learned and how these have been incorporated into the organization's operational policies and procedures**

The TIM Group over the years has made progressive and relevant efforts with the aim of encouraging the transition from a linear economy to a circular economy that can safeguard resources, extend their useful life and reduce the amount going to landfill. This commitment has enabled the activation of a virtuous circle with third sector operators and the entire TIM population, who are proactive and attentive to the values of the circular economy.

The experiences gained in the course of carrying out the activities make it possible to verify with increasing maturity the effectiveness of the processes and foster the continuous improvement of the Group's indicators. The realizations gained have consequently led the Group to make very ambitious commitments with reference to the BU Domestic - which is responsible for the production of about 77% of the waste generated by the entire Organization (FY 2022) - sanctioned as part of its Business Plan 2023-2025.

Finally, in the area of logistics, lessons learned and needs that arose in the

course of business activities led the Domestic BU to reduce the number of TPLs (Third Party Logistics) from two to one, enabling optimization of warehouse and inventory costs.

**[GRI 3-3f] Describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e)**

The TIM Group annually conducts materiality analysis in order to incorporate stakeholder input into its sustainability priorities. In 2022, discussions with various stakeholders at the materiality stage led the Organization to identify an ad hoc material topic focused on the circular economy and waste management aspects, impacting the Group's activities, processes and strategic planning.

The topic of the circular economy and, in general, of the most effective ways to reuse materials and apparatus, are also explored in Italy by TIM with suppliers, brokers, and other international operators and interest groups (e.g., GSMA); such moments of engagement with them on different levels are instrumental to the Domestic BU in order to improve its results and increase its positive impact on the socio-economic fabric from the perspective of circular economy and waste management and storage.

Finally, ongoing discussion with internal Functions enables the creation of synergies that ensure the contribution of all actors within the Organization for the improvement of processes related to materials and virtuous waste management.

# Correlation Material Topics - Enterprise Risk Management

Risks related to the most relevant material topic are mapped and monitored by the Enterprise Risk Management (ERM) Function through specific activities managed in collaboration with the Risk Owners.

Below for the topics that are relevant in terms of risk<sup>(1)</sup> inherent associated are explained the methodologies for calculating risk and the activities carried out to manage it.

## Correlation ESG Impact Topics vs ERM

ESG Topic	Areas of Risk	Inherent Risk Level
Privacy and cybersecurity	Privacy / Cyber	High
Risk Calculation Methodology		
<b>Privacy:</b> <ul style="list-style-type: none"> <li>Methodology: Monte Carlo simulation - Variables: Sanctions applied by Authority on other companies/groups and on TIM, Domestic TIM Turnover, Frequency of Authority Audits on TIM, Compliance Assurance Findings.</li> </ul>	<b>Cyber:</b> <ul style="list-style-type: none"> <li>FAIR (Factor Analysis of Information Risk) methodology with Monte Carlo simulation engine.</li> <li>Variables: Common Platform Enumeration (CPE); Common Vulnerabilities and Exposures (CVE); Internet Exposure; Database Size; Recovery Point Objective; Recovery Time Objective; Business Impact Analysis; HW and SW Aging; Frequency Benchmarks and Impact of Occurrence.</li> </ul>	
Activities Accomplished		
<b>Privacy</b> <ul style="list-style-type: none"> <li>Enabled integration with Compliance and Data Protection Officer (DPO) processes in order to identify key risk factors.</li> <li>Analyzed Compliance Assurance findings in order to define the vulnerability level of TIM processes.</li> <li>Identified and analyzed benchmarks regarding the levels of penalties applied nationwide for non-compliance with Privacy regulations.</li> <li>Structured a quantitative risk valuation model.</li> </ul>		
<b>Cyber</b> <ul style="list-style-type: none"> <li>Engineering a cross-cutting process for cyber risk analysis, assessment and monitoring, integrated with vertical Risk Management Security activities as well as with technical ICT (Chief IT Corporate and Market Systems Office) and NW (Chief Network, Operations and Wholesale Office) activities.</li> <li>Structured a quantitative model of economic-financial valuation of risks and prioritization of ICT security investments based on the contribution in terms of Cyber risk mitigation.</li> <li>Analyzed a perimeter of 800 applications for the purpose of identifying their respective vulnerabilities.</li> <li>Optimized the insurance risk transfer process by assessing catastrophic impacts.</li> </ul>		

(1) Risk level assessed gross of mitigation actions already implemented in the company.

ESG Topic	Areas of Risk	Inherent Risk Level
Customer interaction and service transparency	Market	High
Risk Calculation Methodology		
<b>Fixed/Mobile:</b> <ul style="list-style-type: none"> <li>Methodology Model based on Game Theory + Monte Carlo model.</li> <li>Variables: GDP evolution, Customer Base, the ARPU and the level of perceived quality (Customer Satisfaction Index), benchmark competitors.</li> </ul>	<b>Relevant Projects:</b> <ul style="list-style-type: none"> <li>Methodology based on Monte Carlo simulations.</li> <li>Variables: Perceived quality level, Bid Prices, project Capex/Opex, fees to project partners, minimum commitment, penalties, bid launch timing.</li> </ul>	
Activities Accomplished		
<ul style="list-style-type: none"> <li>Enabled integration with Planning, Strategy and Marketing processes in order to analyze development drivers and identify key risk factors as well as to update the progress of mitigation actions (contractual, process, supply) over time.</li> <li>Implemented an econometric model, supported by Monte Carlo engine, for economic valuation of risk.</li> <li>Developed a cross-cutting process of strategic investment project analysis (and follow-up) with the involvement of proposer functions.</li> </ul>		

ESG Topic	Areas of Risk	Inherent Risk Level
<b>Digital inclusion Infrastructures and emerging technologies</b>	<b>Technological</b>	<b>High</b>
<b>Risk Calculation Methodology</b>		
<ul style="list-style-type: none"> <li>• Methodology: Game theory and Monte Carlo model.</li> <li>• Variables: FTTX network coverage requirements, FTTX revenue activations trend, TIM-FiberCop-KKR Partnership agreement constraints, Reference inflationary environment trend, Commodity price volatility, Gross Domestic Product (GDP) evolution, Customer Base, ARPU, perceived quality level (Customer Satisfaction Index), competitor benchmarks.</li> </ul>		
<b>Activities Accomplished</b>		
<ul style="list-style-type: none"> <li>• Enabled integration with Network, Strategy and Financial Reporting processes in order to assess risks of fiber roll-out delays, overspending on inputs and Decommissioning of the transmission network as well as to update the progress of mitigation actions (mainly process) over time.</li> <li>• Implemented an econometric model, supported by Monte Carlo engine, for economic valuation of risk.</li> </ul>		

ESG Topic	Areas of Risk	Inherent Risk Level
Employee health and safety	Health and Safety	High
Risk Calculation Methodology		
<ul style="list-style-type: none"><li>• Methodology: Monte Carlo model.</li><li>• Variables: Work hours lost annually due to occupational injuries and illnesses (net of hours reimbursed by INAIL), Near Miss trends, Worker injury litigation, FTE (Full Time Equivalent) used to support ASL inspections, ASL sanctions, Average Hourly Enterprise Labor Cost (MOI).</li></ul>		
Activities Accomplished		
<ul style="list-style-type: none"><li>• Activated integration with HSE and Compliance control processes in order to assess the effects of manifested and potential accidents.</li><li>• Analyzed the vertical model of Health and Safety risk analysis, assessment and management.</li><li>• Implemented a quantitative model based on Monte Carlo simulation.</li></ul>		

ESG Topic	Areas of Risk	Inherent Risk Level
<b>Climate change (Climate) Resilience to physical, public health, and sociopolitical risks (Climate/Regulatory*)</b>	<b>Climate/Regulatory*</b>	<b>Medium</b>
<b>Risk Calculation Methodology</b>		
<b>Climate Physical Risks (Hydrogeological, Overspending Assurance Cost, Loss of Productivity Human Resources)</b> <ul style="list-style-type: none"> <li>• Methodology: statistical and arithmetic algorithms.</li> <li>• Variables: NGFS (Network for Greening the Financial System) scenarios on temperature evolution and IMF (International Monetary Found) scenarios on productivity in Europe due to temperature evolution, ISPRA (Istituto Superiore per la Protezione e la Ricerca Ambientale) maps on hydrogeological risk level, Value of asset reconstruction/replacement, geo-referencing of assets on the territory, frequency of major damaging events, Correlation between variability in the number of interventions related to national rainfall and failure rate, Customer Base, Enterprise Manpower (MOI), Unit Cost, Opex, Capex.</li> </ul>		
<b>Transition Climate Risks (Carbon Tax on TIM CO<sub>2</sub> emissions, Overspending supplier CO<sub>2</sub> reduction costs passed on to TIM)</b> <ul style="list-style-type: none"> <li>• Methodology: statistical and arithmetic algorithms.</li> <li>• Variables: Estimated CO<sub>2</sub> emissions from TIM's Scope 1 and a potential carbon tax, CO<sub>2</sub> listing projections on NGFS, estimated cost incurred to reduce CO<sub>2</sub> emissions by suppliers.</li> </ul>		
<b>Activities Accomplished</b>		
<ul style="list-style-type: none"> <li>• Enabled integration with Network, Real Estate, and Insurance processes in order to identify risk factors essential for assessment.</li> <li>• Analyzed NGFS (Network for Greening the Financial System), ISPRA (Institute for Environmental Protection and Research) and IMF (International Monetary Found) scenarios on temperature trends, land riskiness, productivity trends, energy cost analysis.</li> <li>• Developed a statistical-arithmetic model for risk assessment.</li> </ul>		

\* For the Regulatory risk area: ERM activities under analysis.

ESG Topic	Areas of Risk	Inherent Risk Level
Legal and regulatory context management	Regulatory/Privacy	High
Risk Calculation Methodology		
<ul style="list-style-type: none"> <li>• Methodology: Delphi Methodology and Monte Carlo Model.</li> <li>• Variables: Wholesale revenues related to Copper Activation Contributions, Fiber Activation Contributions, Copper Fees and Fiber Fees, Elementary Data 28-day billing (budget provision, fund utilizations, potential Customer Base entitled to reimbursement, likelihood of unfavorable European Court ruling).</li> </ul>		
Activities Accomplished		
<ul style="list-style-type: none"> <li>• Enabled integration with Regulatory, Legal and Financial Reporting processes in order to identify the elemental data needed to assess and monitor the risk impacts of regulatory and management changes.</li> <li>• Implemented a quantitative model based on Delphi methodology (interview on a panel of experts to assess the probability of occurrence of alternative scenarios to the Plan scenario) integrated with Monte Carlo simulation.</li> </ul>		



ESG Topic	Areas of Risk	Inherent Risk Level
<b>Sustainable supply chain</b>	<b>Supply Chain</b>	<b>Medium</b>
<b>Risk Calculation Methodology</b>		
<ul style="list-style-type: none"> <li>• Methodology: Economic-financial evaluation methodology using financial statement analysis and Monte Carlo Model.</li> <li>• Variables: Supplier balance sheet data, supplier production capacity ratio, inflationary environment trends, constraints arising from the implementation of the National Recovery and Resilience Plan tenders (implementation time, penalties, batch implementation requirements).</li> </ul>		
<b>Activities Accomplished</b>		
<ul style="list-style-type: none"> <li>• Enabled integration with Network Operations and Procurement processes in order to identify elemental, budgetary data and constraints needed for evaluation as well as monitor the risk impacts of management evolutions.</li> <li>• Analyzed the National Recovery and Resilience Plan Italy 1 Giga, 5G Connectivity and 5G Backhauling tenders.</li> <li>• Implemented a model for assessing the economic and financial riskiness of network providers with both backward-looking (balance sheet analysis) and forward-looking (probabilistic model of the impact of exogenous/endogenous factors) views.</li> </ul>		

# Environment<sup>(1)</sup>

**GRI 201-2** | Financial implications and other risks and opportunities due to climate change

**GRI 302-1** | Energy consumption within the organization<sup>(2)</sup>

**GRI 302-2** | Energy consumption outside of the organization

**GRI 302-3** | Energy intensity<sup>(3)</sup>

**GRI 305-1** | Direct (Scope 1) GHG emissions<sup>(4)</sup>

**GRI 305-2** | Energy indirect (Scope 2) GHG emissions<sup>(5)</sup>

**GRI 305-3** | Other indirect (Scope 3) GHG emissions

**GRI 305-4** | GHG emissions intensity<sup>(6)</sup>

**GRI 305-5** | Reduction of GHG emissions<sup>(7)</sup>

**GRI 306-1** | Waste generation and significant waste-related impacts

**GRI 306-2** | Management of significant waste-related impacts

**GRI 306-3** | Waste generated

**GRI 306-4** | Waste diverted from disposal

**GRI 306-5** | Waste directed to disposal

(1) The reporting boundary of the Non-Financial Statement coincides with the boundary of the Annual Financial Report, excluding environmental data. In determining the scope of environmental consolidation, threshold values were applied to the scope of BU Domestic 2021 as found in the 2022 Financial Report. In particular:

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

The TIM Group companies included in the '22 environmental scope are listed below: TIM S.p.A, Sparkle Group (Companies that meet the criteria), Fibercop S.p.A, Noovle S.p.A., Olivetti S.p.A., Telecontact Center S.p.A., Telenergia S.r.l., Telsy S.p.A., TIM Retail S.r.l., TIM Servizi Digitali S.p.A., as well as BU Brazil.

(2) For BU Brazil includes Cozani except for the reporting of diesel consumption for generator sets, steam and cooling.

(3) For BU Brazil includes Cozani; for BU Domestic only companies based in Italy are considered.

(4) For BU Brazil includes Cozani.

(5) For BU Brazil includes Cozani.

(6) For BU Brazil includes Cozani. For BU Domestic, only companies based in Italy are considered.

(7) Group calculation is based on GHG inventory for both BUs. For BU Brazil it also includes Cozani for Scope 1 emissions (except emissions from Gensets) and Scope 2.

## GRI 201-2 | Financial implications and other risks and opportunities due to climate change

Climate change events can have physical, economic, and regulatory implications, with financial repercussions on TIM's image and reputation. For the resulting risks to be monitored, prevented and mitigated, TIM builds its risk matrix, aimed at proposing adaptive actions to anticipate and avoid adverse effects. Managing these risks opens up opportunities for the Group to strengthen the resilience and efficiency of its assets and begin a process of energy transition. As a company of TLC sector, the dematerialization services that have always been offered can become a real opportunity if the demand for these services increases as a result of situations generated by climate change. Internally, TIM seizes this opportunity through the expanded application of agile working. The BU Domestic Enterprise Risk Management Department identifies and assesses the following risks related to Climate Change.

Physical risks related to rising temperatures causing extreme and unexpected atmospheric precipitation, landslides, flooding or overflow.

In particular:

Hydrogeological risk:

- damage caused to real estate and network assets
- Assurance Cost Overspending: increased assurance costs
- decreased performance at work: reduced production capacity due to stress from increased temperatures

Transition risks ie:

- potential introduction of a carbon tax applied to CO<sub>2</sub> emissions
- occurrence of the phenomenon of Energy Overspending i.e., increased spending on energy to purchase or produce renewable energy to reduce emissions.

In this context, TIM may have to manage Capex and Opex overspending to ensure business continuity, expected customer quality as well as compliance with Strategic Plan goals, through the following targeted interventions:

- optimization of equipment placement within the properties
- insurance coverage for catastrophic natural events
- structural interventions aimed at containing the effects of floods
- analysis of hydrogeological risk maps for network planning and development
- prioritization of decommissioning of energy-intensive equipment and technologies based on specific risk level
- agreements with network providers to regulate service restoration efforts during extreme weather events.

In 2022 TIM in Brazil incorporated climate change risk into its Corporate Risk Management process to strategically monitor non-performance or inadequate performance in service delivery due to extreme weather events.

An assessment of future climate risks was conducted “and it was” based on a set of existing models and scenarios to define the potential climate impacts to which assets are subject. The geographic location where most network equipment and

technical buildings are located in Brazil, including infrastructure such as bio-sites and traditional ERBs (GreenField and Rooftop), were taken into account: the vulnerability of network equipment varies depending on the location and geographic distribution and the function performed by the equipment.

Extreme events caused by climate change that can damage facilities/infrastructure directly impacting TIM's business include water shortages, storms, and cyclones. Regarding water scarcity, it should be noted that energy from water sources has an important representation in Brazil's electricity matrix.

Anticipating this possible risk scenario, TIM promotes initiatives aimed at self-generation of energy and reduction of consumption in its services and facilities, restructuring processes and research into technologies to achieve maximum efficiency. The Company invests in renewable contracting through its distributed generation plan with solar, hydro, and biogas plants, reducing its dependence on the Brazilian energy grid. The Company also operates by purchasing clean energy on the free market and certificates of origin for energy from renewable sources (I-RECs).

From an opportunity perspective, Brazil believes that the TLC sector has a role in helping to reduce greenhouse gas emissions by enabling remote communication and reducing the need for travel that necessitates the burning of fossil fuels. Therefore, TIM S.A. invests in offering solutions based on new technologies, stimulating more efficient production models and logistics processes in various sectors, acting to be a company that stimulates a less GHG-intensive economy.

## GRI 302-1 | Energy consumption within the organization

The Group's energy consumption is broken down into consumption of electricity purchased and produced from renewable sources, purchase of electricity from mixed sources, consumption from heating fuels, consumption from fuels for transport, and consumption for self-generation of electricity. No share of electricity, heating energy, cooling energy, or steam is sold.

BU Brazil's share of energy produced from biomass is included in production from renewable sources.

For BU Domestic, 45% of the electricity out of the total electricity consumed by the same BU comes from renewable sources.

## Energy consumed within the organization

		2022			2022		2021	2020
Energy from Mixed Sources	u.m.	Group	BU Domestic	BU Brazil	BU Domestic	BU Brazil	Group	Group
Energy from unleaded petrol	MJ	42,087,104	85%	15%	35,919,058	6,168,045	31,655,676	37,852,626
Energy from diesel fuel	MJ	426,265,874	100%	0%	426,073,007	192,866	413,231,373	423,960,083
Energy from ethanol fuel	MJ	739,636	0%	100%	-	739,636	0	0
Energy from natural gas fuel	MJ	12,248	100%	0%	12,247	0	0	0
Energy from LPG	MJ	2,025	100%	0%	2,025	-	12,778	317
<b>Total energy from transport</b>	<b>MJ</b>	<b>469,106,887</b>	<b>98%</b>	<b>2%</b>	<b>462,006,340</b>	<b>7,100,547</b>	<b>444,899,827</b>	<b>461,813,026</b>
2022/2021		5%						
2022/2020		2%						
Energy from heating oil	MJ	1,616,735	100%	0%	1,616,735	0	1,551,680	20,202,925
Energy from heating natural gas	MJ	139,389,993	100%	0%	139,389,993	0	149,172,887	148,764,722
<b>Total energy from heating</b>	<b>MJ</b>	<b>141,006,728</b>	<b>100%</b>	<b>0%</b>	<b>141,006,728</b>	<b>0</b>	<b>150,724,567</b>	<b>168,967,647</b>
2022/2021		-6%						
2022/2020		-17%						
<b>Self-production of electricity from biogas</b>	<b>MJ</b>	<b>19,038,011</b>	<b>0%</b>	<b>100%</b>	<b>0</b>	<b>19,038,011</b>		
<b>Energy for diesel fuel for generators</b>	<b>MJ</b>	<b>34,634,165</b>	<b>56%</b>	<b>44%</b>	<b>19,441,830</b>	<b>15,192,334</b>	<b>20,144,204</b>	<b>24,369,951</b>
2022/2021		72%						
2022/2020		42%						
<b>Energy for methane for trigeneration systems</b>	<b>MJ</b>	<b>1,031,142,229</b>	<b>100%</b>	<b>0%</b>	<b>1,031,142,229</b>	<b>0</b>	<b>1,368,361,863</b>	<b>1,302,219,029</b>
2022/2021		-25%						
2022/2020		-21%						
<b>Purchase of electricity from mixed sources</b>	<b>MJ</b>	<b>2,700,114,851</b>	<b>100%</b>	<b>0%</b>	<b>2,700,114,851</b>	<b>0</b>	<b>3,184,671,650</b>	<b>5,032,817,134</b>
2022/2021		-15%						
2022/2020		-46%						
<b>Total energy from mixed sources</b>	<b>MJ</b>	<b>4,395,042,870</b>	<b>99%</b>	<b>1%</b>	<b>4,353,711,978</b>	<b>41,330,892</b>	<b>5,168,802,111</b>	<b>6,990,186,786</b>
2022/2021		-15%						
2022/2020		-37%						

continued

## Energy consumed within the organization

Energy from Renewable Sources	u.m.	2022			2022		2021	2020
		Group	BU Domestic	BU Brazil	BU Domestic	BU Brazil	Group	Group
<b>Self-production of electricity from renewable sources</b>	<b>MJ</b>	<b>976,144,298</b>	<b>0%</b>	<b>100%</b>	<b>1,525,528</b>	<b>974,618,769</b>	<b>885,365,449</b>	<b>405,331,636</b>
2022/2021		10%						
2022/2020		141%						
<b>Purchase of electricity from renewable sources</b>	<b>MJ</b>	<b>3,814,585,441</b>	<b>67%</b>	<b>33%</b>	<b>2,553,211,126</b>	<b>1,261,374,314</b>	<b>3,298,629,370</b>	<b>1,954,655,250</b>
2022/2021		16%						
2022/2020		95%						
<b>Self-production of electricity from biogas</b>	<b>MJ</b>	<b>429,997,300</b>	<b>0%</b>	<b>100%</b>	<b>0</b>	<b>429,997,299</b>		
<b>Total energy from renewable sources</b>	<b>MJ</b>	<b>5,220,727,039</b>	<b>49%</b>	<b>51%</b>	<b>2,554,736,656</b>	<b>2,665,990,383</b>	<b>4,183,994,819</b>	<b>2,359,986,886</b>
2022/2021		25%						
2022/2020		121%						
<b>Total energy consumed</b>	<b>MJ</b>	<b>9,615,769,909</b>	<b>72%</b>	<b>28%</b>	<b>6,908,448,634</b>	<b>2,707,321,275</b>	<b>9,352,796,929</b>	<b>9,350,173,672</b>
2022/2021		2.8%						
2022/2020		2.8%						

It should be noted that, starting from 2022 and with respect to the reporting of non-financial data of the subsidiary TIM S.A., in relation to the energy consumed within the organization at a consolidated level, the consumption of natural gas and biogas used for self-production has been disclosed of electricity in Brazil, in order to ensure greater compliance with the requirements of the GRI 302-1 disclosure.

Steam and cooling output generated by trigeneration plants 2022 is shown in the table below. Consumption of natural gas, used as a primary source in trigeneration,

is included in the calculation of energy consumed within the organization, displayed in the Energy consumed table and included in Scope 1 emissions.

2022			
Steam and Cooling	u.m.	BU Domestic	BU Brazil
Energy for cooling	MJ	179,958,883	0
Energy from steam	MJ	335,494,676	0

## GRI 302-2 | Energy consumption outside of the organization

For the BU Domestic, consumption related to the use of third-party infrastructure (TIM S.p.A. perimeter) contributes to the calculation of energy consumed outside the organization. The energy consumption estimate refers to mobile service and is based on consumption net of what is supplied directly by Telenergia (which falls under Scope 2 as mobile network) and infrastructure sites (which fall under Scope 2, included in fixed network).

For BU Brazil, energy generated by Business travells and Downstream Transportation and Distribution is included and represented in the calculation.

TIM S.p.A. <sup>(8)</sup>	u.m.	2022
Total	GJ	1,377,966

(8) The data reported here are for TIM SpA only.

BU Brazil	u.m.	2022
Total	GJ	36,848

## GRI 302-3 | Energy intensity

The Group measures its energy efficiency through the eco-efficiency indicator that relates the service provided to customers (bits transmitted) to the impact on the environment (joules of energy consumed). Data and voice traffic values from landline and mobile networks are taken into account, as well as industrial consumption (for transmission and power plant air conditioning use), civilian consumption (electricity for office use, air conditioning, and office heating), and automotive consumption.

The Group calculates different indicators for Italy and Brazil because the two realities are very different from operational and environmental point of view: in



Brazil, traffic is mainly from the mobile network, no heating fuels are used given the particular climatic conditions, and there are no trigeneration plants.

Italy	u.m.	2022	2021	2020
Eco-efficiency in Italy	bit/J	29,071	25,768	20,648

The indicator considers only consumption within the organization. The Italy perimeter includes only companies with headquarters and assets in Italy.

BU Brazil	u.m.	2022	2021	2020
Eco-efficiency in Brazil	bit/J	19,991	19,271	16,146

## GRI 305-1 | Direct (Scope 1) GHG emissions

Group	u.m.	2022				2021		2020
		Gruppo	BU Domestic	BU Brazil	BU Domestic	BU Brazil	Group	Group
Emissions from trigeneration	kgCO <sub>2</sub> eq	57,921,819	100%	0%	57,921,819	-	77,174,832	73,229,289
Emissions from transport	kgCO <sub>2</sub> eq	33,045,972	99%	1%	32,725,535	320,437	31,017,337	33,959,890
Emissions from heating	kgCO <sub>2</sub> eq	7,944,985	100%	0%	7,944,985	-	8,521,733	9,851,888
Emissions from electricity self-production by mixed sources*	kgCO <sub>2</sub> eq	3,577,678	39%	61%	1,384,154	2,193,524	1,408,143	1,792,763
Emissions from ozone depleting gases	kgCO <sub>2</sub> eq	10,498,868	33%	67%	3,465,788	7,033,080	9,688,453	11,816,301
<b>Total direct emissions Scope 1 GHG</b>	<b>kgCO<sub>2</sub>eq</b>	<b>112,989,321</b>	<b>92%</b>	<b>8%</b>	<b>103,442,280</b>	<b>9,547,041</b>	<b>127,810,498</b>	<b>130,650,131</b>
2022/2021		-12%						
2022/2020		-14%						

\*Emissions from self-production of electricity from mixed sources in the table include both emissions from diesel for generator sets and emissions from natural gas for self-production of energy.

The Group's Scope 1 greenhouse gas emissions consist almost exclusively of carbon dioxide generated from fossil fuels for heating, automotive, and power generation. Leakage of hydrochlorofluorocarbon (HCFC) and hydrofluorocarbon (HFC) gases and other gases when present in air-conditioning and fire-fighting systems are also considered and included in the calculation converted to CO<sub>2</sub>. The emissions reported here refer to the year 2022 and the Domestic and Brazil BUs as identified in the environmental scope.

The emission factors used in 2022 are CO<sub>2</sub> equivalent factors published by DEFRA (Department For Environment, Food and Rural Affairs). The valuation of CO<sub>2</sub>

equivalent emissions of HCFCs, HFCs and other refrigerant gases is done by reference to their respective 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. For BU DOMESTIC, the IPCC Fourth Assessment was used in the calculation; BU Brazil refers instead to the IPCC Fifth Report Assessment (AR5 - 100 years). The method used by the Brazilian GHG Protocol Program uses global warming potentials (GWPs) of the 100-year time horizon in relation to CO<sub>2</sub>. Although AR5 values are the most recent, the method also considers values from the second assessment report (1995) and fourth assessment report (2007) for inventory purposes.

## GRI 305-2 | Energy indirect (Scope 2) GHG emissions

CO <sub>2</sub> emissions	u.m.	2022		2021		2020
		Group	BU Domestic	BU Brazil	Group	Group
<b>Market Based</b>	<b>kgCO<sub>2</sub>eq</b>	<b>341,806,828</b>	<b>100%</b>	<b>0%</b>	<b>405,235,181</b>	<b>495,622,685</b>
2022/2021		-16%				
2022/2020		-31%				

		2022			2021	2020
CO <sub>2</sub> emissions	u.m.	Group	BU Domestic	BU Brazil	Group	Group
<b>Location Based</b>	<b>kgCO<sub>2</sub>eq</b>	<b>399,188,397</b>	<b>96%</b>	<b>4%</b>	<b>442,596,650</b>	<b>458,843,480</b>
2022/2021		-10%				
2022/2020		-13%				

Represented here are the Scope 2 Market Based and Location Based emissions expressed in kg of CO<sub>2</sub>-equivalent using the atmospheric greenhouse gas emission factors in the electricity sector from the AIB 2022 report for Italy and Greece and the 2021 Location Based Terna coefficients for Turkey in the absence of the Market Based; for BU Brazil the average factor from the Ministry of Science, Technology Innovation and Communication Location Based was used in the absence of

the Market Based factor. Scope 2 Location Based emissions are calculated for companies consolidating in the BU Domestic perimeter using the atmospheric emission factors of greenhouse gases in the electricity sector from the ISPRA 2022 report for Italy and the 2021 Terna coefficients for Greece and Turkey; for BU Brazil the average factor of the Ministry of Science, Technology Innovation and Communication of Brazil was used.

## GRI 305-3 | Other indirect (Scope 3) GHG emissions

Group	u.m.	2022	2021
Indirect GHG emissions (Scope 3) - Category 1	tCO <sub>2</sub> eq	862,780	912,842
2022/2021		-5%	
Indirect GHG emissions (Scope 3) - Category 2	tCO <sub>2</sub> eq	3,338,948	3,914,964
2022/2021		-15%	
Indirect GHG emissions (Scope 3) - Category 11	tCO <sub>2</sub> eq	404,795	442,227
2022/2021		-8%	
<b>Total Indirect Emissions (Scope 3)</b>	<b>tCO<sub>2</sub>eq</b>	<b>4,606,523</b>	<b>5,270,033</b>
2022/2021		-13%	

Similar to 2021, the calculation of CO<sub>2</sub>eq Scope 3 emissions is done for the entire Group on a purchase basis and with Quantis Evaluator of the GHG Protocol for Categories 1 and 2 with the same methodology used in 2021. The share of emissions from the use of third-party infrastructure in Italy, reported in 302-2 and transformed into AIB residual mix coefficient emissions, was also added to Category 1. The calculation of category 11 was carried out only for TIM S.p.A. using internal methodology and is based on the average consumption of TIM equipment at users' homes.

The emission factor used in the calculation is ISPRA 2022 LB.

The calculation of the three categories shown is in NFS as of 2021, the year on which the historical comparison depicted here is based<sup>(9)</sup>.

The calculation shows CO<sub>2</sub>eq. emissions. Emissions of a biogenic nature constitute a separate calculation, the details of which are given in 305-2 and are related to the BU Brazil perimeter only and amount to 54,131.99 tCO<sub>2</sub>eq.

(9) The 2022 reporting excludes categories 6 and 7 moving progressively closer to the categories on which TIM has an SBT target.

## GRI 305-4 | GHG emissions intensity

Italy	u.m.	2022	2021	2020
Emission intensity	kgCO <sub>2</sub> eq/Terabits	2.17	2.92	4.04

BU Brazil	u.m.	2022	2021	2020
Emission intensity	kgCO <sub>2</sub> eq/Terabits	0.41	ND	ND

TIM has carbon-intensity indicators, which differ by geographic area due to the different composition of emissions in Italy and Brazil. For companies in the Italy perimeter (foreign Sparkle companies are excluded from the calculation), the indicator relates direct and indirect CO<sub>2</sub>eq emissions (Scope 1 and Scope 2, measured in kg and generated through their own activities) to the service offered to customers (Tbit transmitted). Landline/mobile voice and data traffic values

and direct emissions generated by consumption of fossil fuels for heating, self-traction and self-generation of electricity together with indirect emissions related to the purchase of electricity generated by third parties are taken into account. For BU Brazil, Scope 1 and Scope 2 emissions are considered, which include CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O and HFCs gases. Both TIM S.A. and Cozani were considered in the scope. No indicator history is available for BU Brazil.

## GRI 305-5 | Reduction of GHG emissions

The figures shown here refer to the Group perimeter and express the change in CO<sub>2</sub> equivalent emissions in the year 2022 compared to the emissions reported in 2021. The calculation is based on accounting for emissions according to the GHG Protocol approach by distinguishing between direct emissions or Scope 1, indirect emissions or Scope 2, and other indirect emissions or Scope 3.

Group	u.m.	2022 vs. 2021	2021 vs 2020	% 2022 vs 2021	% 2021 vs 2020
Scope 1	tCO <sub>2</sub> eq	-14,821	-2,840	-12%	-2%
Scope 2	tCO <sub>2</sub> eq	-63,428	-90,388	-16%	-18%
Scope 3	tCO <sub>2</sub> eq	-664	ND	-13%	ND

## GRI 306-1 | Waste generation and significant waste-related impacts

For BU Domestic, the waste generated by the company, tracked and reported, is special waste, hazardous and nonhazardous.

Their production is related to network infrastructure management activities and the management and reorganization of locations. The waste generated is mainly delivered for recycling, and only a small portion is delivered for disposal. Instead, municipal waste from the ordinary operation of the sites is delivered through the municipal utilities.

As for BU Brazil, the Company generates hazardous and non-hazardous waste, both in administrative processes and in infrastructure installation and maintenance. Waste is disposed of properly, in accordance with the requirements of the legislation, so as not to cause environmental damage or generate fines and penalties. In addition, Brazil recognizes its direct and shared responsibility in the management of electronic waste (such as cell phones, batteries, accessories, modems, etc.) and undertakes to avoid and/or eliminate waste and reuse and/or recover materials. Reported impacts refer to waste generated in the organization's activities.

## GRI 306-2 | Management of significant waste-related impacts

As for BU Domestic specific contractual clauses are included in service contracts in order to regulate the management of special waste; in goods supply contracts additional clauses are included to avoid the use of certain hazardous substances. For assets that are not in use, the possibility of their reuse in the business environment is assessed in advance before they are disposed of.

The waste produced is delivered to suppliers authorized to transport and handle it. Suppliers are obliged to provide copies of the registrations and authorizations required by legal regulations in order to enable prior control during contracting and field verifications during the course of conferring activities.

Data related to waste delivery are recorded through a computerized loading and unloading log management system.

For BU Brazil, efficient and responsible management of solid waste is one of the objectives assumed by TIM in the ESG Plan and is provided for in the Company's Environmental Policy. In addition, in compliance with the National Solid Waste Policy (L. 12,305/2010), TIM shares with business partners the responsibility for receiving and properly disposing of post-consumer electronic equipment (such as smartphones, modems, batteries and accessories). Another vector for reducing waste generation is the digitization of services, which reduces the amount of paper needed to issue invoices and collections.

In the pursuit of constant improvement of its processes, in 2021 TIM in Brazil began reporting the disposal of waste called CPE (Customer Premises Equipment) from customers (individuals or legal entities) who requested its cancellation or stopped

paying for service. All collected material goes through the reconditioning process that evaluates the possibility of reusing the equipment. Measuring the number of cell phones recovered for reuse in the TIM Smart Troca program, which turns old cell phones into vouchers, was also initiated in 2022.

### GRI 306-3 | Waste generated

Waste data show a variable trend over time in relation to quantity and type of waste. The most important figure is the ratio of waste generated to waste delivered for recycling/recovery.

Waste is delivered to authorized parties outside the Company.

Indicator	u.m.	2022			2021	
		Group	BU Domestic	BU Brazil	Group	Group
Non-Hazardous Waste	ton	7,652	5,915	1,737	8,314	7,911
			77%	23%		
Hazardous Waste	ton	2,582	2,006	576	3,116	2,097
			78%	22%		
<b>Total Waste generated</b>	<b>ton</b>	<b>10,234</b>	<b>7,921</b>	<b>2,313</b>	<b>11,430</b>	<b>10,008</b>
			77%	23%		
2022 out of 2021		-10%				
2022 out of 2020		2%				



2022

Indicator	u.m.	Group	BU Domestic	BU Brazil
Paper/cardboard	t	551	100%	0%
Metal	t	538	100%	0%
Organic	t	191	0%	100%
Plastic	t	59	100%	0%
Glass	t	28	100%	0%
More	t	6,286	75%	25%
Hazardous waste (batteries, used LEDs, etc.)	t	2,582	78%	22%
<b>Total solid waste generated</b>	<b>t</b>	<b>10,234</b>	<b>77%</b>	<b>23%</b>

## GRI 306-4 | Waste diverted from disposal

### Waste diverted from disposal

2022

Indicator	u.m.	Group	BU Domestic	BU Brazil
Total waste for recycling	t	9,449	7,859	1,590
Total waste for reuse	t	92	0	92
Total waste diverted from disposal	t	9,541	7,859	1,682
Total waste produced	t	10,234	7,921	2,313
<b>% recycled waste to total products</b>	<b>%</b>	<b>93%</b>	<b>99%</b>	<b>73%</b>

Below is the detail regarding hazardous waste.

### Hazardous waste

2022

Indicator	u.m.	Group	BU Domestic	BU Brazil
Total hazardous waste for recycling	t	2,528	1,953	576
Total hazardous waste for reuse	t	0	0	0
Total hazardous waste diverted from disposal	t	2,528	1,953	576
Total hazardous waste generated	t	2,582	2,006	576
<b>% of total hazardous waste</b>	<b>%</b>	<b>98%</b>	<b>97%</b>	<b>100%</b>

## GRI 306-5 | Waste directed to disposal

2022

Indicator	u.m.	Total non-hazardous waste		Total hazardous waste	
		BU Domestic	BU Brazil	BU Domestic	BU Brazil
Total waste directed to disposal	t	6	631	57	0

2022

Indicator	u.m.	Total non-hazardous waste		Total hazardous waste	
		BU Domestic	BU Brazil	BU Domestic	BU Brazil
More	t	3	631	57	0
Paper	t	0	0	0	0
Metal	t	0	0	0	0
Plastic	t	0	0	0	0
Waste from electrical and electronic equipment	t	3	0	0	0

2022

Indicator	u.m.	Total non-hazardous waste		Total hazardous waste	
		BU Domestic	BU Brazil	BU Domestic	BU Brazil
Landfilling - on site	t	0	0	0	0
Landfilling - at an external site	t	3	631	0	0
Incineration (with energy recovery) - on-site	t	0	0	0	0
Incineration (with energy recovery) - at an external site	t	0	0	0	0
Incineration (without energy recovery) - on-site	t	0	0	0	0
Incineration (without energy recovery) - at an external site	t	1	0	0	0
Other disposal operations - on-site	t	1	0	0	0
Other disposal operations - at an external site	t	1	0	57	0
Total other disposal operations	t	2	0	57	0
Total landfilling	t	3	631	0	0
Total Incineration (with energy recovery)	t	0	0	0	0
Total Incineration (without energy recovery)	t	1	0	0	0

# Human Rights | Discrimination

## GRI: 406-1 Incidents of discrimination and corrective actions taken

**[GRI 406-1a]** Complaints received and handled regarding the whistleblowing channel (whistleblowing channel does not cover all BU Domestic companies). GRI 406 focuses on discrimination not also on other Human Rights.

	2022	2021	2020
Total number of complaints Italy	8	5	8
Number of substantiated complaints Italy	1	1	0
Total number of complaints Brazil	61	59	59
Number of substantiated complaints Brazil	22	20	18

### [GRI 406-1b.i]

Complaints received and handled regarding discrimination in Italy	2022	2021	2020
Total number of complaints regarding discrimination received through the whistleblowing mechanism	2	2	0
Total number of complaints regarding discrimination received through the mechanism of whistleblowing substantiated	1	1	0
Number of complaints handled regarding discrimination during the reporting period	2	2	0
Number of complaints handled regarding discrimination during the reporting period substantiated	1	1	0
Number of resolved complaints regarding discrimination during the reporting period	2	1	0
Number of resolved complaints regarding discrimination during the reporting period substantiated	1	1	0
Total number of complaints received before the survey period and resolved in the reporting period	1	0	0
Total number of complaints received before the survey period and resolved in the substantiated reporting period	0	0	0

*continued*

Complaints received and handled regarding discrimination in Brazil	2022	2021	2020
Total number of complaints regarding discrimination received through the mechanism of whistleblowing	13	14	6
Total number of complaints regarding discrimination received through the mechanism of whistleblowing of which substantiate	5	1	2
Number of complaints handled regarding discrimination during the reporting period	13	14	6
Number of complaints handled regarding discrimination during the reporting period of which substantiated	5	1	2
Number of resolved complaints regarding discrimination during the reporting period	12	8	6
Number of resolved complaints regarding discrimination during the reporting period of which substantiated	5	1	2
Total number of complaints received before the survey period and resolved in the reporting period	6	0	0
Total number of complaints received before the survey period and resolved in the reporting period of which substantiated	1	0	0

**[GRI 406-1b.ii] [GRI 406-1b.iii] [GRI 406-1b.vi]** For the one substantiated report in BU Domestic<sup>(1)</sup>, the employee who engaged in discriminatory behavior (verbal harassment for gender discrimination) was ordered to attend mandatory Human Rights training and fined one hour's pay.

In addition, outreach to other resources in the facility was undertaken, including non-compulsory use of the aforementioned course. In the BU Domestic<sup>(2)</sup>, monitoring on the actual utilization of the training course was successful.

(1) The whistleblowing channel does not cover all BU Domestic companies.

(2) The whistleblowing channel does not cover all BU Domestic companies.

Of the thirteen reports received in BU Brazil,

- seven involved LGBT+ issues (two of which were substantiated, with notification to the trading partner, as a disciplinary measure);
- three were related to ethnicity/physical appearance (two of which were substantiated, with suspensory measures and feedback);
- two involved being overweight (one of which was substantiated with a warning letter);
- one related to age (unconfirmed).

Of the six reports received in 2021 that were resolved in 2022, five were related to ethnicity/physical appearance (unsubstantiated) and one was related to sexual orientation (substantiated, which resulted in disciplinary action of dismissal from the Company).

In Domestic BUs, monitoring conducted as of September 2022, on the conduct of the employee who engaged in discriminatory behavior, did not reveal any critical issues.

To strengthen the fundamentals of corporate governance, marked by the principles of transparency and confidentiality, in the Brazil BU made available to stakeholders internal and external the [www.whistleblowing](https://www.tim.com.br/rj/canal-de-denuncias) channel, in bilingual format (Portuguese and English), accessible through the corporate intranet and internet (<https://www.tim.com.br/rj/canal-de-denuncias>) e [www.tim.com.br](https://www.tim.com.br) > Serviços > Canal de Denúncias) or by telephone (on 0800 900 8007), available 24 hours a day, 7 days a week. Full information is available at this link: [www.tim.com.br/sp/canal-de-denuncias](https://www.tim.com.br/sp/canal-de-denuncias).

In the Domestic BU, in 2021 the action plan implemented (consisting of a ban on the reported - non-employee - future dealings with TIM) did not lend itself to a monitoring activity in view of the type of action reported.

# Employees

**GRI 201-3** | Defined benefit plan obligations and other retirement plans and opportunities

**GRI 401-1** | New employee hires and employee turnover

**GRI 401-2** | Benefits provided to full-time employees that are not provided to temporary or part time employees

**GRI 401-3** | Parental leave

**GRI 402-1** | Minimum notice periods regarding operational changes

**GRI 403-1** | Occupational health and safety management system

**GRI 403-2** | Hazard identification, risk assessment, and incident investigation

**GRI 403-3** | Occupational health services

**GRI 403-4** | Worker participation, consultation, and communication on occupational health and safety

**GRI 403-5** | Worker training on occupational health and safety

**GRI 403-6** | Promotion of worker health

**GRI 403-7** | Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

**GRI 403-8** | Workers covered by an occupational health and safety management system

**GRI 403-9** | Work-related injuries

**GRI 403-10** | Work-related ill health

**GRI 404-1** | Average hours of training per year per employee

**GRI 404-2** | Programs for upgrading employee skills and transition assistance programs

**GRI 404-3** | Percentage of employees receiving regular performance and career development reviews

**GRI 405-1** | Diversity of governance bodies and employees

**GRI 405-2** | Ratio of basic salary and remuneration of women to men

**GRI 407-1** | Operations in which the right to freedom of association and collective bargaining may be at risk

**GRI 408-1** | Operations and suppliers at significant risk for incidents of child labor

**GRI 409-1** | Operations at significant risk for incidents of forced or compulsory labor



## GRI: 201-3 | Defined benefit plan obligations and other retirement plans and opportunities

**[GRI 201-3a, b.i, b.ii, d, e]** TIM Group has, for BU Domestic:

National Supplementary Pension Fund for Employees of Telecommunication Companies—"Telemaco," a negotiated defined-contribution pension fund of the telecommunication services enterprise sector (Art. 52 of the CCNL).

Telemaco established in 1998 in the form of a recognized nonprofit association has been operational since October 2000; the objective of this pension fund is to enable members to have supplementary pension benefits from the mandatory system upon retirement. To this end, it provides for the collection of contributions, the management of resources in the sole interest of members, and the provision of benefits in accordance with the provisions of the supplementary pension regulations in force from time to time. Telemaco is intended for blue-collar, white-collar and middle-collar workers, hired on a permanent basis or under an apprenticeship contract as per Article 20 of the CCNL; tax dependents of members and beneficiaries enrolled in the Fund may also join Telemaco.

The contribution to the Fund to be borne by companies, effective December 1, 2022, increased from 1.3% of the salary taken as the basis for determining severance pay to 1.4%. Said contribution is recognized in favor of workers enrolled in Telemaco who, in addition to severance pay, decide in turn to contribute to the Pension Fund with a minimum contribution of 1% of the salary taken as the basis for determining severance pay. The number of current employees - belonging to

TIM Group companies - as of January 1, 2023 enrolled in Telemaco is 37,945.

More information can be found at <https://www.fondotelemaco.it/>.

Fontedir is the Supplementary Pension Fund for Group executives who, on a voluntary basis, decide to join by establishing an individual position fueled by contributions made by the Company and the members themselves. It provides, through agreements with insurance companies, for the provision of supplementary pension benefits from the compulsory system to which it belongs and directly disburses the benefits accrued in the pension position (liquidations, surrenders, advances, transfers ...) if the legal requirements are met. The Fund operates under a defined contribution system: the amount of retirement benefits is determined according to the contributions made, based on the principle of capitalization. It follows that the obligations under the plan are, by mathematical calculation, covered by the resources managed.

Annuities on individual positions, for Fontedir, are provided by the separate management subject to a special agreement with insurance companies; pension plan obligations are 100% covered by what is set aside specifically. For Fontedir, the obligations under the plan are, by mathematical calculation, covered by the resources managed. There are 1,157 executives enrolled in the Fund as of Dec. 31, 2022, of whom 448 are employed by TIM Group.

More information can be found at <https://www.fontedir.it/>.

**[GRI 201-3a, b.i, b.ii, b.iii, c, d, e]** In BU Brazil, the status of each pension plan is given in a separate report; in summary:

- i. The Company's obligation with the closed supplementary pension plans is 5.8 mln reais.
- ii. The basis for estimation is available in the report itself (population, underlying assumptions, etc.).
- iii. The estimate was made on 12/31/2022.

Closed supplementary pension plans (those inherited from acquisitions of other companies) are currently in the black. However, should it be necessary to balance one of these plans due to a possible shortfall, TIM S.A. will assume this obligation. It is important to note that the value of all liabilities is 5.85 million reais. Finally, it should be noted that the pension plan offered by TIM S.A. has a more modern structure with a defined contribution, which in itself mitigates the need for future contributions based on actuarial risk.

The percentage of salary contributed by the employee or employer is 5%, with the possibility of increasing it to 15% for managerial figures.

Currently, the plan offered by TIM S.A. is voluntary and universal (offered to all employees).

Participation is 53%.

## GRI: 401-1 New employee hires and employee turnover

### [GRI 401-1a]

		2022			2021			2020		
Group	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees hired	n	1,965	1,594	3,559	2,019	1,533	3,552	1,406	869	2,275
Terminated employees	n	3,022	2,097	5,119	2,602	1,618	4,220	3,496	1,655	5,151
Total	n	4,987	3,691	8,678	4,621	3,151	7,772	4,902	2,524	7,426

		2022			
Group	u.m.	Men	Women	Total	
Employees hired <30	n	797	567	1,364	
Employees hired 30-50	n	1,093	975	2,068	
Employees hired >50	n	75	52	127	
Employees hired	n	1,965	1,594	3,559	
Terminated employees <30	n	582	462	1,044	
Terminated employees 30-50	n	1,061	1,039	2,100	
Terminated employees >50	n	1,379	596	1,975	
Terminated employees	n	3,022	2,097	5,119	
Total employees	n	4,987	3,691	8,678	
Total	n	14,961	11,073	26,034	

Group	u.m.	2022		
		Men	Women	Total
Employees hired - Italy	n	819	436	1,255
Employees hired - Abroad	n	1,146	1,158	2,304
Employees hired	n	1,965	1,594	3,559
Terminated employees - Italy	n	1,883	992	2,875
Terminated employees - Abroad	n	1,139	1,105	2,244
Terminated employees	n	3,022	2,097	5,119
Total employees	n	4,987	3,691	8,678
Total	n	14,961	11,073	26,034

**[GRI 401-1b]**

Group	u.m.	2022			2021			2020		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Positive turnover rate	%	6	8	7	4	3	7	3	2	4
Negative turnover rate	%	9	11	10	5	3	8	7	3	10

Group	u.m.	2022				2021				2020			
		<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
Positive turnover rate	%	49	10	0	7	3	4	0	7	2	2	0	4
Negative turnover rate	%	38	10	7	10	2	3	3	8	1	2	6	10

Group	u.m.	2022			2021			2020		
		Italy	Abroad	Total	Italy	Abroad	Total	Italy	Abroad	Total
Positive turnover rate	%	3	24	7	3	23	7	2	7	4
Negative turnover rate	%	7	24	10	5	23	8	8	8	10

## GRI: 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees

**[GRI 401-2a]** All the Group's full-time or part-time, permanent or temporary workers enjoy the same benefits.

In Italy, the supplementary pension plan is extended to workers with apprenticeship and insertion contracts, as well as permanent workers.

In Brazil, any differences in benefit payments are not related to the different forms of contract.

**[GRI 401-2b]** See GRI 2-6 for the definition of a significant place of business.

## GRI: 401-3 Parental leave

		2022		2021		2020	
Group <sup>(1)</sup>	u.m.	Men	Women	Men	Women	Men	Women
Total number of employees who took parental leave	n	482	456	414	541	152	553
Total number of employees who returned to work during the reporting period after taking parental leave	n	*	*	476	379	394	468
Total number of employees who have returned to work after taking parental leave and are still employed by the organization in the 12 months after return	n	*	*	378	337	400	311
Rate of return to work in the Company of employees who have taken parental leave	%	*	*	99	83	95	87
Company retention rate of employees who have taken parental leave	%	*	*	93	81	91	100

(1) Total number of employees who were entitled to parental leave: As per specific Italian and Brazilian laws, Group employees all have the same right to take parental leave. Od December 31 of each year. In addition, only compulsory maternity and paternity leave was taken into account when recording the number of people who took parental leave. In contrast, parental leave for optional abstention is not considered because it is non-consecutive leave that varies over the 12 years of the employee's child.

\*The data will be available from the end of 2023.

## GRI: 402-1 Minimum notice periods regarding operational changes

The minimum notice period, for BU Domestic, is governed - for some matters - by the relevant legal and contractual regulations as well as by the company regulations applied to all TIM employees (the notice period differs depending on the change e.g. working hours, territorial transfers, job change, company transfer). In this regard, the Company operates in full compliance with the applicable regulatory framework. In general terms, TIM pays attention to listening to and involving employee representatives in advance, including reorganization processes. In this regard, the Company operates within the minimum timeframe where required by the law/collective bargaining applied.

TIM Brasil adopts the criterion of reasonableness on a case-by-case basis, but has no legal minimum term.

**[GRI 402-1a] [GRI 402-1b]** For BU Domestic, 3.5 weeks is the minimum notice period for the purposes of notice to the union, observed in accordance with the law, during procedures functional to the transfer of business.

Organizational changes with significant impact on employment and staffing levels are discussed with union representatives and, in some cases, an ad hoc agreement is made, in which case the agreement itself specifies the timing and modalities of the reorganization.

Of note, in 2022:

- an Expansion Contract (CoE) was signed at the Ministry of Labor in August to support the business transformation process, the renewal of technical and professional skills, and the need to acquire new professional profiles. The 18-month CoE is applied to approximately 30,000 employees of TIM S.p.A., Telecontact, Noovle S.p.A., Olivetti S.p.A., and TI Sparkle S.p.A. and includes:
  - permanent hiring program to address the need to find new professionals required by industrial transformation.
  - a new training and retraining plan for staff already employed by the Company, with the aim of enhancing and updating existing skills.
  - the reduction of working hours (instrumental to the general purposes of the contract) for the period September 1, 2022 - February 29, 2024 with payment of the extraordinary wage supplement, provided by law.
  - retirement companion plan affecting both managerial and clerical staff.
- the new organizational model of alternating onsite and remote work (agile work/desk sharing) was the subject of prior discussion with union representatives that ended with a union agreement (November), which was transposed by individual agreement between worker and company to acquire the worker's consent. The agreement calls for closing offices on Fridays and moving to three days of agile work as opposed to two days in the previous agreement.

TIM Brasil adopts the criterion of reasonableness and has a good relationship with the union, where relevant decisions that the Company makes in advance are presented and brought to the negotiating table with the union, to arrive at the best scenario for both parties (Company and employees). An example of this criterion are the two outsourcing activities that took place in 2022 related to billing and anti-fraud. Both outsourcings were communicated at least 2 months in advance to the affected employees, with the main goal of relocating them, either internally or in the market. In addition, a number of exceptional clauses have been developed for the dismissal of these employees in order to generate as little impact on their personal lives as possible.

## GRI: 403-1 Occupational health and safety management system

**[GRI 403-1a] [GRI 403-1b]** Within the Italian territory<sup>(2)</sup>, the reference regulatory provisions for health and safety issues in the workplace, in addition to defining the necessary criteria for the identification and assessment of risks, require that in this context adequate worker participation and consultation be implemented through workers' safety representatives.

i) TIM ensures the full adherence of its management system to the regulatory

provisions of the Workers' Health and Safety Consolidation Act (Legislative Decree 81/2008).

(ii) Regarding the management of office/promiscuous real estate, the management system has been implemented according to UNI ISO 45001.

TIM's safety management system model, provides for the full involvement of all actors involved in the safety process: company management, operational coordination figures, competent doctors, workers and Workers' Safety Representatives (RLS).

In order to complement and reinforce these initiatives, an "Occupational Health and Safety Management Model" complying with recognized standards (UNI ISO 45001) has been implemented, having as its perimeter all processes related to the design, construction, operation and maintenance of the office and mixed-use real estate assets manned.

TIM S.A. establishes<sup>(3)</sup> guidelines and principles to be applied in all TIM activities in Brazil, with the aim of promoting continuous improvement in occupational safety and health actions.

The safety and health at work policy includes 3 key commitments:

(a) Occupational injury prevention and health protection;

<sup>(2)</sup> Perimeter: TIM S.p.A., Telecontact, Noovle, Fibercop and Sparkle.

<sup>(3)</sup> Through PL 631 - Policy "Safety and health at work" and health at work policy safety and health at work.

- (b) compliance with legal and other requirements of the organization;
- (c) continuous improvement of the management system, with the aim of increasing safety and health performance.

Scope: employees, service providers, interns, young trainees and visitors to TIM Group facilities in Brazil, including Instituto TIM.

Occupational health and safety regulations are referenced by national and international standards (ISO 14001) and best practices applicable to the Company.

## GRI: 403-2 Hazard identification, risk assessment, and incident investigation

**[GRI 403-2a.i] [GRI 403-2a.ii]** Within the Italian territory<sup>(4)</sup>, the identification and assessment of risks present in the Company, which represents the preeminent activity of prevention action is governed by specific internal procedures and is ensured through the constant monitoring of business processes and their evolutions in close connection with line structures. To carry out this activity, specialized in-house resources operate, capable of carrying out instrumental analyses and surveys in the field of occupational safety (high and low-frequency electromagnetic fields, noise, vibration, natural radioactivity, lighting engineering, microclimate, manual handling of loads, etc.).

Work activities are classified on low and medium risk levels, in line with the

ATECO classification criteria of the National Institute of Statistics. In TIM S.p.A. as well as in the Group's other subsidiaries, there are no assets classified as high risk.

Control measures applied for the elimination or containment of risks include:

- the numerous health and safety training programs, differentiated according to the risks and job profiles in the Company;
- the latest individual and/or collective protective equipment and devices often designed ad-hoc in collaboration with the most relevant multinational companies on the market;
- any necessary organizational arrangements made in cooperation with the lines that can ensure an acceptable level of risk where it cannot be eliminated.

The continuous regulatory evolution related to Covid-19 risk has forced the adjustment of prevention and protection activities, changing, in some cases, intervention priorities. Some actions have been reshaped to ensure the protection of the entire corporate population from the main health risk of infection.

In addition, the following were fielded:

- information and awareness campaign targeting all staff, with periodic updates;
- specific arrangements for the management of any established or suspected positive cases.

In Brazil, TIM S.A. identifies the hazards/aspects and risks/impacts of activities, products, and services that it can control and those that it can influence,

<sup>(4)</sup> Perimeter: TIMS.p.A., Telecontact, Noovle, Fibercop and Sparkle.



considering the life-cycle perspective, through direct observation of activities and operations, analysis of documents, including applicable legislation, occupational health and safety (OSH) inspections, reading of procedures, instructions, records, process flowcharts, and the results of internal and external audits.

Activities/processes with the presence of potentially hazardous risk factors are carried out by duly qualified professionals and have undergone service provision.

TIM S.A. has not identified any unhealthy/dangerous conditions based on occupational risk management programs/analysis issued by companies/qualified professionals during the period.

The resulting programs are carried out by qualified occupational health and safety and environmental professionals.

These processes provide input for the implementation of control measures and improvements with the goal of minimizing risks and ensuring a healthy work environment.

**[GRI 403-2b]** Within the Italian territory the definition of safety roles allows each worker to know his or her hierarchical chain to which to report any hazards and dangerous situations at work, in addition workers can also report the presence of any hazards through CRM Facility System and the computerized procedure “Verification of supervisors and reporting anomalies.”

In Brazil, there is an official public whistleblowing channel for employees of the Company that guarantees anonymity regarding reports of dangers and risk situations in accordance with the whistleblowing policy-channel.

**[GRI 403-2c]** Within the territory of Italy<sup>(5)</sup>, the worker is always required to take care of his own health and safety and that of other persons in the workplace, on whom the effects of his actions or omissions fall, according to the training he has received and the instructions and means provided by the employer.

The worker in fact:

- must contribute to security;
- must comply with the provisions and instructions given by the employer, his supervisors and managers;
- must immediately report deficiencies in means and devices to the employer, manager or supervisor;
- shall not remove or modify safety or warning or control devices without permission;

(5) Perimeter: TIM S.p.A, Telecontact, Noovle, Fibercop and Sparkle.

- must follow the training;
- must undergo health checks.

In Brazil, there is a whistleblowing channel for employees, an official company channel that guarantees anonymity regarding reports of hazards and risk situations in accordance with the whistleblowing policy-channel.

**[GRI 403-2d]** Within the Italian territory<sup>(6)</sup>, occupational accidents are subject to analysis through the implementation of specific investigations aimed at analyzing the causes related to the event also in order to prepare possible corrective and improvement actions with the direct involvement of the lines concerned and the Human Resources & Organization Office Function for greater synergy.

The scope of the project for the detection and management of near misses was expanded to include all field technicians in 2022 and the start of detection for workers allocated in Real Estate as well.

In Brazil, as described in the internal regulation - Management of Occupational Events - all events are analyzed by the team of professionals in the field of occupational health and safety, as well as causes are identified and action plans are developed with the aim of preventing further events of the same nature.

<sup>(6)</sup> Perimeter: TIM S.p.A, Telecontact, Noovle, Fibercop and Sparkle.

## GRI: 403-3 | Occupational health services

**[GRI 403-3a]** TIM S.p.A.'s personnel health protection service is entrusted to specialized providers operating by territorial areas of responsibility with reference to the following areas:

- health surveillance in accordance with the provisions of Legislative Decree 81/2008;
- health examinations under Article 5. L. 300/70;
- pre-employment visits;
- visits for deferral of maternity leave (Legislative Decree 151/2001);
- verification of absence of contraindications to the role of assistant to the disabled in emergency cases and related training (DM 10/03/1998).

In this context, to date, competent physicians have been appointed, with assignment perimeter on a regional/provincial/work location basis. An additional competent physician, third to the appointed ones made available by the providers, is specifically contracted by TIM S.p.A. to serve as coordinating competent physician.

The health surveillance pool, derived from the provisions of the risk assessment documents of TIM S.p.A.'s employer lines is, to date, approx. 17,800 workers, subjected to one or more examination protocols among the following: video

display screen work risk, manual load handling risk for technical profiles, work at height risk, electromagnetic field risk, chemical risk. The main worker profiles in the health surveillance pool are video screeners (approx. 10,900 workers) and field technicians (approx. 6,100 workers).

The Health Safety & Environment (HSE) Function and territorial safety principals monitor the activities of suppliers and the enforcement of relevant contracts.

The Operational Guideline “Management of Health Checks in Occupational Health and Safety” describes the responsibilities and operations inherent in the health protection process adopted in TIM S.p.A. in occupational health and safety, from planning to the organization, management and execution of health checks.

In order to protect the health and safety of workers, annual monitoring campaigns are carried out through instrumental surveys regarding physical agents in particular: indoor noise, outdoor noise, electromagnetic fields, ionizing radiation, optical radiation, vibration, outdoor and indoor microclimate parameters, and lighting parameters of working environments. Substances and preparations used in the Company and exposure to chemical and biological agents in work activities are also checked when necessary.

In Brazil, the Occupational Health Medical Monitoring Program (PCMSO) aims to indicate occupational medical examinations related to environmental risk conditions, if any, as a condition for monitoring worker health. Occupational health certificates (ASO, in the Portuguese acronym) are performed upon admission, return to work, dismissal, change of function, and periodically, as described in the PCMSO.

## GRI: 403-4 | Worker participation, consultation and communication on occupational health and safety

**[GRI 403-4a]** TIM S.p.A.'s corporate relational model on safety, which has always been inspired by participatory logics, includes about 80 Representatives distributed throughout the country.

The number, method of designating or electing Workers' Safety Representatives, as well as the paid working time and means of performing the functions are established in collective bargaining.

In Brazil, TIM S.A. has the internal Accident Prevention Committee in its subsidiaries, which meets monthly to discuss issues related to accident prevention, health promotion and suggestions for process improvement.

In branches where the number of employees does not reach the minimum required for CIPA composition, the company shall designate at least one employee to fill this role. Employees can contact the HSE team to ask questions about occupational health and safety processes.

TIM S.A. provides information channels on its intranet on actions and campaigns related to quality of life, accident prevention, health promotion, and the environment.

**[GRI 403-4b]** In TIM S.p.A. there are 5 committees (one for each territorial area and one national) with mixed Company/union participation with specific functions in the field of workers' health and safety.

These bodies, which are present at the national and territorial levels, have a participatory and collaborative role designed to ensure analysis and joint confrontation between the company and union sides on all issues related to the protection of health and safety in the workplace.

Meetings will take place as needed and in any case at least three national meetings for each committee as stipulated in the Industrial Relations Protocol of January 11, 2019.

In Brazil, 97% of the workforce is currently represented in health and safety committees<sup>(7)</sup>.

## GRI: 403-5 | Worker training on occupational health and safety

### [GRI 403-5a]

Group<sup>(8)</sup>:

Health and safety training	u.m.	2022	2021	2020
Hours of health and safety training	h	133,516	172,772	155,186
Total hours of training	h	2,708,738	5,316,361	2,000,600
Percentage of health and safety training hours out of the total	%	5	3	9

The main types of courses organized during 2022 include: ISO 45001 training, first aid, environmental emergency management, occupational safety and health, and the use of signs in road and highway work.

(7) The change of 0.8% from the number submitted in 2021 is due to the increase in employees allocated in industrial warehouses, the number of which does not meet the composition requirement for representatives of these committees.

(8) For BU Domestic, with reference to the accident phenomenon, the timely analysis of events continues and where necessary the identification of corrective actions with the direct involvement of the lines concerned and the HR Function for greater synergy. The expansion of the scope of application of the pilot project for the detection and management of near misses continues, with 50% of on-field technicians (about 3,500 resources) in Chief Technology & Operations Office being involved in 2022 and the start of detection also for workers allocated in Real Estate. More details about the training hours are available in the appendix.

## GRI: 403-6 | Promotion of worker health

**[GRI 403-6a] [GRI 403-6b]** For TIM S.p.A., ASSILT (Association for Supplementary Health Care for Workers of TIM Group Companies), financed by TIM, its worker members and retired members, pursues the non-profit purpose of providing members and beneficiaries with benefits supplementary to those provided by the National Health Service, including, in cooperation with public health facilities, conducting research, cognitive surveys and group and individual preventive health care interventions, as well as promoting health education initiatives to protect the health and physical integrity of members. As of Dec. 31, 2022, more than 72,000 people were enrolled in the Association, including about 39,000 employees and 33,000 retirees, to which should be added more than 50,000 beneficiary family members. In 2022 ASSILT disbursed more than 52 million in member contributions. ASSIDA provides reimbursements to executives for health benefits supplementary to those provided by the National Health Service. As of Dec. 31, 2022, there were 2,927 people served by the Association, 510 executives enrolled, and about 10.9 million disbursed.

In order to support preventive health care for staff, TIM provides all those aged 45 years and older the opportunity to benefit from a flexible and personalized preventive health care program every two years.

Since 2019, TIM has created “Project WellBeing,” a program of initiatives and educational paths aimed particularly at reducing stress, promoting movement

and physical activity, improving lifestyles and preventing health. In addition, in collaboration with TIM myBroker (an insurance brokerage company, wholly owned by TIM), the TIMmyHealth service was identified-a Health Care policy that provides comprehensive health care for the whole family and offers telemedicine service.

On the subject of health education to protect the health and physical integrity of workers during 2022, the following health welfare campaigns were promoted in cooperation with ASSILT:

- ophthalmology campaign: preventive medicine campaign towards employees of TIM and Group companies focused on protecting the visual apparatus. The initiative came about as a result of the pandemic emergency that has produced significant effects on people's lives involving, among other things, an expanded application of smart working to employees, resulting in greater eye engagement. The campaign, which started last year, continued in the first half of 2022 by providing the opportunity for all employees to have an extraordinary eye examination (on top of the ceiling provided by ASSILT) at their eye doctor of choice with reimbursement paid by the company.
- Influenza vaccination campaign: in order to ensure an adequate immune response to the influenza virus, taking into account the value in terms of health prevention, TIM and ASSILT offered the opportunity for members who do not fall into the categories whose vaccine administration is offered by the National Health System (NHS), to be able to get vaccinated free of charge by reimbursing the cost of the medicine and any inoculation.

In Brazil, the Company provides health and dental plans for its employees and their dependents, according to clauses 17 and 18 of the Collective Bargaining Agreement. These plans also allow consultations via teleguidance when technically possible.

The Company offers an emotional, psychological and social support program: the Apoio Pass is a service that offers social, legal and psychological guidance with experts. Program counseling is totally free, confidential and available by phone 24 hours a day, 7 days a week.

It is important to emphasize the assistance provided by social service to contribute to sensitive social situations that require acceptance and proper guidance.

The company has an exclusive allowance for dependent children with significant health problems that make self-care impossible, regardless of the age of the dependent child. The program allows reimbursement for expenses related to necessary issues, such as diapers and equipment.

In 2022, the Company's new work model was launched, allowing for on-site and/or remote work, depending on the area/location. In this new model, employees can also request to work temporarily in a completely remote mode because of the need to intensively care for a sick family member or even for some treatment that the employee needs to do that does not prevent him from working, according to his doctor. Examples include treatments that generate only some difficulty in locomotion or the need to stay at home to facilitate treatment. In addition to the usual professionals related to occupational medicine, the

Company has a team of professionals specializing in health care who manage the plans offered. These professionals also study the epidemiological behavior of the population for the construction of targeted programs or individualized care, if appropriate. All information related to the employee's health is covered by confidentiality.

### **GRI: 403-7 | Prevention and mitigation of occupational health and safety impacts directly linked by business relationships**

**[GRI 403-7a]** TIM S.p.A. ensures the fulfillment of all legal obligations in the area of occupational safety that impact its customers and contractors within the scope of ordinary customer-supplier relationships. In this regard, it ensures maximum cooperation and collaboration to minimize risks and ensure the safety of its own personnel and third parties.

The actions under this approach and applied for the elimination or containment of risks are:

- the implementation of various health and safety training programs, differentiated according to the risks and job profiles in the Company;
- the adoption of state-of-the-art individual and/or collective protective equipment and devices often designed ad-hoc in collaboration with the most relevant multinationals on the market;

- the establishment of necessary organizational arrangements carried out in cooperation with lines designed to ensure an acceptable level of risk where it cannot be eliminated.

In Brazil, TIM S.A. identifies, evaluates and permanently monitors the hazards/aspects and risks/impacts of the activities, products and services it can control and those it can influence, considering the life cycle perspective, through direct observation of activities and operations, analysis of documents, including applicable legislation, reading of procedures, instructions, records, process flow and results of internal and external audits, according to TIM's internal regulations, such as: investigation of environmental aspects and impacts, occupational health and safety risks and hazards, chemical management.

TIM S.A. establishes, through specific access control regulations, potential risk areas, limiting qualified and eligible employees to activities in the Company's facilities.

## GRI: 403-8 | Workers covered by an occupational health and safety management system

[GRI 403-8a.i, a.ii, a.iii] Group<sup>(9)</sup>:

Employees covered by a health and safety at work system	u.m.	2022	2021
Employees covered	n	50,377	51,913
Total employees	n	50,377	51,913
Percentage of employees covered	%	100	100

Employees covered by a health and safety in at work management system that has been internally audited	u.m.	2022	2021
Employees covered	n	10,384	10,648
Total employees	n	50,377	51,913
Percentage of employees covered	%	21	20

Employees covered by a health and safety in at work management system that has been externally audited	u.m.	2022	2021
Employees covered	n	8,347	3,716
Total employees	n	50,377	51,913
Percentage of employees covered	%	17	7

(9) A management system complying with recognized standards (ISO 45001) has been implemented having office/promiscuous real estate assets as its boundary.



**[GRI 403-8b]** The administered are excluded from the tables above.

**[GRI 403-8c]** A new management system complying with recognized standards (ISO 45001) has been implemented having as its perimeter the real estate assets under the Real Estate Function.

Some Group companies (Noovle and Sparkle Italia) also have a system certified by an external body and subject to internal audit.

Data on employees covered by an occupational safety and management system for 2022 are shown below.

**[GRI 403-8b,c, e]** TIM S.A., through its internal safety and health policy, establishes guidelines and principles to be applied in all TIM's activities in Brazil, with the aim of promoting continuous improvement in occupational safety and health actions.

The safety and health at work policy includes 3 key commitments:

- (a) Occupational injury prevention and health protection;
- (b) compliance with legal and other requirements of the organization;
- (c) continuous improvement of the management system, with the aim of increasing safety and health performance.

## GRI: 403-9 | Work-related injuries

**[GRI 403-9a]** Group:

Accidents - Employees	u.m.	2022	2021	2020
Accidents recorded at work (including deaths)	n	259	239	249
Accidents at work with serious consequences (>6 months of absence), excluding deaths	n	3	1	3
travel accidents (only if transport was arranged by the organization)	n	0	4	13
Number of deaths as a result of work-related injuries	n	0	0	0

Hours worked - Employees	u.m.	2022	2021	2020
Hours worked	h	73,886,548	79,947,742	81,211,899

Accident rates (Frequency indices) - Employees	2022
Death rate <sup>(10)</sup>	0.00
Rate of commuting accidents (only if transportation was arranged by the organization)	0.00
Rate of work-related injuries with serious consequences (>6 months of absence), excluding fatalities	0.03
Rate of recordable occupational injuries (including fatalities)	3.51

Rates calculated for salaried personnel are on 1,000,000 hours.

The rates shown are calculated without taking into account the accidents and the hours lost resulting from accidents suffered by executives or those occurring in

<sup>(10)</sup> Calculated death rate: number of deaths from injuries/(hours worked/1,000,000)

Commuting accident rate: number of commuting accidents/(hours worked/1,000,000)

Rate of occupational accidents with serious consequences: number of occupational accidents with serious consequences/(hours worked/1,000,000)

Recordable work injury rate: recordable work injuries/(hours worked/1,000,000)

transit, nor do they include so-called medication injuries, which did not therefore result in absences of at least one day (UNI 7249:2007 standard); moreover, agency contract workers are not taken into account.

Group injury indicators - Employees	u.m.	2022	2021	2020
Severity index (conventional days lost due to injury per thousand hours worked)	dd/h	0.12	0.12	0.11
Frequency index (no. of accidents/total hours worked/1,000,000)	n/h	3.51	2.99	2.91
Average injury duration in days	dd	36.16	39.81	37.18
Unproductivity index (hours lost to injury per thousand worked)	h	0.76	0.78	0.71
Accidents per 100 workers		0.51	0.47	0.57

**[GRI 403-9c] [GRI 403-9d]** Domestic BU shall ensure the identification and assessment of risks to worker safety and health with a view to their progressive elimination or minimization by adopting the principles, standards and solutions that constitute international business “good practices” and considering, as a basic requirement, compliance with existing standards.

The Company plans the activities, resources and objectives of the risk assessment process by identifying the business processes involved, the workers affected, and the tools, techniques and methodologies to be used. In this context, information is collected, documentary and field investigations are carried out to enable the

identification of sources of danger and exposed persons and to acquire all the information and data necessary for proper assessment. In this context, constant monitoring of the accident phenomenon makes it possible to highlight any critical areas in order to activate corrective or improvement actions.

In 2022, there were 3 occupational accidents that had, in terms of days of absence (with prognoses greater than 180 days), serious consequences: 1 case for a generic fall hazard from building stairs, 1 case for electrocution hazard and 1 case of injury to the ankle following a fall from a height gain.

The occupational injuries with serious consequences are being investigated in order to identify possible improvement actions.

Occupational injuries are the subject of appropriate investigations by the territorial safety units, which, through specific investigations, identify the causes of the injuries (which may be attributable to worker behavior, the work environment and/or external factors), also making use of the collaboration of the injured person himself and other company figures involved (such as the person in charge who oversees the work activity). Inquiries are aimed at highlighting any critical areas on which to intervene with improvement actions that may involve, for example, awareness talks, updated training/information, remedial work on facilities/infrastructure up to and including the possible updating of risk assessment.

In Brazil, TIM S.A. identifies, evaluates, and monitors hazards and risks based on the detection of environmental aspects and impacts, hazards, and occupational health and safety risks.

Measures to eliminate and minimize hazards are guided by the Hazard Inventory and the Occupational Health Medical Monitoring Program (PCMSO).

**[GRI 403-9e]** Rates calculated for employees are on 1,000,000 hours.

**[GRI 403-9f]** In the data for salaried staff, temporary employees are not counted.

**[GRI 403-9g]** Useful data for reading are given in footnotes in the tables.

## GRI: 403-10 | Work-related ill health

**[GRI 403-10a.i] [GRI 403-10a.ii]** Group:

Occupational diseases for employees	u.m.	2022	2021	2020
Number of recordable cases of occupational diseases	n	4	6	14
Number of deaths from occupational diseases	n	1	0	0

**[GRI 403-10a.iii]** For TIM S.p.A., the main types of occupational diseases include musculoskeletal, respiratory and hearing disorders.

**[GRI 403-10c]** For TIM S.p.A., the Company shall provide for the identification and assessment of risks to worker safety and health for the purpose of their progressive elimination or minimization by adopting the principles, standards and solutions that constitute international business “good practices” and considering, as a basic requirement, compliance with existing standards. The Company plans the activities, resources and objectives of the risk assessment process by identifying the business processes involved, the workers affected, and the tools, techniques and methodologies to be used. In this context, information is collected, documentary and field investigations are carried out to enable the identification of sources of danger and exposed persons and to acquire all the information and data necessary for proper assessment. In this context, constant monitoring of the phenomenon of occupational diseases makes it possible to highlight any areas where to activate corrective or improvement actions.

**[GRI 403-10d]** All TIM S.p.A. workers are included in this disclosure.

**[GRI 403-10e]** For Italy, regarding occupational diseases, complaints presented by employees to INAIL (Istituto Nazionale per l'Assicurazione contro gli Infortuni sul Lavoro) were taken into account in the reference year and submitted for recognition.

## GRI: 404-1 | Average hours of training per year per employee

[GRI 404-1] Group:

		2022			2021			2020		
Total training hours provided to employees	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior managers	h	3,118	1,131	4,248	4,430	908	5,338	6,730	1,662	8,392
Middle managers	h	150,020	77,646	227,676	421,897	187,024	608,921	104,336	35,262	139,598
Office staff	h	1,396,955	1,075,685	2,472,629	2,956,045	1,746,057	4,702,102	1,075,638	776,972	1,852,610
Workers	h	4,184	0	4,184	0	0	0	0	0	0
Total	h	1,554,276	1,154,462	2,708,738	3,382,372	1,933,989	5,316,361	1,186,704	813,896	2,000,600

		2022			2021		
Hours of training provided to employees by type of training	u.m.	Men	Women	Total	Men	Women	Total
Environment	h	1,935	1,768	3,703	2,201	1,594	3,795
Health and Safety	h	108,416	25,100	133,516	135,748	37,024	172,772
Anticorruption	h	105,901	68,575	174,476	10,068	10,247	20,315
Human Rights	h	0	2	2	2,840	4,155	6,995
Privacy	h	2,959	2,046	5,005	3,012	3,005	6,017
Sustainability	h	104,295	76,643	180,938	8,765	7,901	16,666
Other themes	h	1,230,771	980,328	2,211,098	3,219,736	1,870,064	5,089,801
Total	h	1,554,276	1,154,462	2,708,738	3,382,370	1,933,991	5,316,361

\*2022 figures:

- Men: 48 h/pro-capite - Women: 59 h/pro-capite
- Senior Managers: 7 h/pro-capite - Middle managers: 49 h/pro-capite - Office staff: 53 h/pro-capite - Workers: 26 h/pro-capite
- Total: 52 h/pro-capite

		2022			2021		
Percentage of total training hours provided to employees by type of training	u.m.	Men	Women	Total	Men	Women	Total
Environment	%	0	0	0	0	0	0
Health and Safety	%	7	2	5	4	2	3
Anticorruption	%	7	6	6	0	1	0
Human Rights	%	0	0	0	0	0	0
Privacy	%	0	0	0	0	0	0
Sustainability	%	7	7	7	0	0	0
Other themes	%	79	85	82	95	97	96

## GRI: 404-2 | Programs for upgrading employee skills and transition assistance programs

[GRI 404-2a] The following are the main development activities that characterized 2022 for BU Domestic:

- Youth Development: the development pathway (Beyond the Garden) launched in 2020 and continued throughout 2021 and 2022 involved about 300 young people under 35 with the goals of fostering skill building, increasing engagement, and facilitating intergenerational exchange.
- Skill Assessment: is an online assessment tool. The projects implemented in 2022 covered the areas of smart working, digital culture, ICT, soft knowledge

(agile, data culture, cybersecurity, etc.). Adherence rates to the various initiatives were decidedly high standing at over 77 percent for all surveys.

- Potential assessment system: is a process that contributes to the identification and enhancement of the Company's current and future managerial assets and supports the people involved in their development.

**[GRI 404-2b]** In Italy, TIM wants to make the occupational system consistent with changes in the labor market by integrating it with new trades, describing core skills and promoting the acquisition of emerging skills. During 2022, the revisiting of professional roles, related competencies and reference grading were validated with the lines.

In 2022, TIM S.A. in Brazil once again evolved its people development practices, focusing on digitization, personalization and inclusion.

Through research, benchmarking and numerous conversations with internal stakeholders, the performance management process has evolved to deliver even more value to employees. Three rounds of evaluation involving more than 5,600 people were initiated.

Earlier this year, Cycle 21 was launched, with over 98 percent participation. In July, TIM S.A. released the first peer review for projects, opening the 2022 cycle with improvements in the experience of our internal customers.

For leadership development, for example, new editions of the inter-company E-Coaching and Mentoring programs were launched, involving more than 270 people.

In the E-Coaching program, about 85 managers and senior managers experienced a short 5-session digital coaching course with an ICF-certified coach during this year to accelerate growth and address management challenges. So far, more than 340 leaders have been involved in this program since 2020. With the support of an external leadership consulting firm TIM S.A. mapped out the executives who are part of the Company's succession plan.

## GRI: 404-3 | Percentage of employees receiving regular performance and career development reviews

[GRI 404-3a] Group:

		2022			2021			2020		
Employees	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior managers	n	262	66	328	344	79	423	266	61	327
Middle managers	n	2,964	1,291	4,255	2,842	1,213	4,055	2,628	1,117	3,745
Staff office	n	25,709	14,317	40,026	26,922	15,884	42,806	22,993	12,535	35,528
Workers	n	0	0	0	0	0	0	0	0	0

		2022			2021			2020		
Percentage of employees	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior managers	%	63	63	63	79	70	77	66	67	67
Middle managers	%	96	94	95	97	95	97	96	96	96
Staff office	%	99	97	98	99	96	98	92	93	92
Workers	%	0	0	0	0	0	0	0	0	0

## GRI: 405-1 | Diversity of governance bodies and employees

### [GRI 405-1a] Group:

		2022			2021			2020		
Governing body members	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Under 30 years old	n	0	0	0	0	0	0	0	0	0
30 to 50 years old	n	16	11	27	15	10	25	31	2	33
Over 50 years	n	42	10	52	40	5	45	66	3	69
Total	n	58	21	79	55	15	70	97	5	102

		2022			2021			2020		
Percentage of members of the organization's governing bodies by gender and age group	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Participants in management committees - under 30 years old	%	0	0	0	0	0	0	0	0	0
Management committee participants - 30 to 50 years old	%	20	14	34	21	14	36	30	2	32
Participants in management committees - over 50 years old	%	53	13	66	57	7	64	65	3	68

### [GRI 405-1b] Group:

		2022			2021			2020		
Number of employees by category and gender	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior managers	n	441	111	552	482	118	600	424	97	521
Middle managers	n	3,210	1,457	4,667	3,209	1,419	4,628	2,826	1,206	4,032
Staff office	n	27,453	17,550	45,003	28,593	18,092	46,685	24,641	13,717	38,358
Workers	n	155	0	155	0	0	0	0	0	0
Total	n	31,259	19,118	50,377	32,284	19,629	51,913	27,891	15,020	42,911

		2022			2021			2020		
Percentage of employees by category and gender	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Senior managers	%	80	20	100	80	20	100	81	19	100
Middle managers	%	69	31	100	69	31	100	70	30	100
Staff office	%	61	39	100	61	39	100	64	36	100
Workers	%	100	0	100	0	0	0	0	0	0

		2022			2021			2020		
Percentage of Executives by age group and gender	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	%	0	0	0	0	0	0	0	0	0
>50	%	76	64	70	76	58	67	80	64	72
30-50	%	24	36	30	24	42	33	20	36	28

		2022			2021			2020		
Percentage of Middle Managers by age group and gender	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	%	0	0	0	0	0	0	0	0	0
>50	%	73	66	69	72	63	67	74	65	69
30-50	%	27	34	30	28	37	33	26	35	31

		2022			2021			2020		
Percentage of Employees by age group and gender	u.m.	Men	Women	Total	Men	Women	Total	Men	Women	Total
<30	%	6	7	6	6	8	7	2	2	2
>50	%	59	41	50	58	39	48	64	46	55
30-50	%	35	52	44	36	53	44	34	52	43



Percentage of workers by age and gender	u.m.	2022
<30	%	Men 13
>50	%	55
30-50	%	32

Percentage of distinct employees for other indicators of diversity	u.m.	2022	2021	2020
Ethnic minority employees	%	7	6	0
Disabled employees	%	3	3	3
Ethnic minority staff employees	%	0	1	0

## GRI: 405-2 | Ratio of basic salary and remuneration of women to men

[GRI 405-2] BU Domestic:

Ratio of annual basic salary (RAL) of women than men by occupational category	u.m.	2022
Senior managers	%	101
Middle managers	%	97
Staff office	%	92

Remuneration ratio (RGA) of women than men by occupational category	u.m.	2022
Senior managers	%	102
Middle managers	%	95
Staff office	%	92

BU Brazil:

Ratio of annual basic salary (RAL) of women than men by occupational category	u.m.	2022
Senior managers	%	105
Middle managers	%	98
Staff office	%	68

Remuneration ratio (RGA) of women than men by occupational category	u.m.	2022
Senior managers	%	103
Middle managers	%	98
Staff office	%	69

Other companies:

Ratio of annual basic salary (RAL) of women than men by occupational category	u.m.	2022
Middle managers	%	84
Staff office	%	152

Remuneration ratio (RGA) of women than men by occupational category	u.m.	2022
Senior managers	%	0
Middle managers	%	82
Staff office	%	146

Salary (RAL) was taken to mean gross annual fixed salary.

Remuneration (Annual Global Remuneration - RAG) was taken to mean RAL plus all individual incentive systems (MBO, Performance Bonus, Vendor Incentive).

**[GRI 405-2b]** See GRI 2-6 for the definition of significant place of business.

## GRI: 407-1 | Operations in which the right to freedom of association and collective bargaining may be at risk

**[GRI 407-1a]** The activities carried out by the staff do not restrict freedom of association and all the rights and prerogatives provided by law and contract regarding union rights. Collective bargaining is applied to all employees within the perimeter of BU Domestic.

In Brazil, TIM S.A. guarantees its employees the full right to union freedom and collective bargaining (through the union). All these rights are guaranteed by a collective agreement.

TIM Brazil's collective agreements cover 100 percent of employees.

**[GRI 407-1b]** For the Domestic BU, TIM's industrial relations model is inspired to intensify the preventive phases of information and moments of union discussion, including through specific company bodies (in the form of committees), with the task of delving into specific matters in a technical manner, such as, by way of example, training, health and safety in the workplace, welfare and equal opportunities.

At the territorial level, the Unitary Trade Union Representatives (RSUs) have a widespread presence in all Italian regions to encourage adequate participation in decentralized discussions. The position of RSU member is held by about 380 people at TIM S.p.A. To the trade union representatives present in the Company, TIM recognizes specific prerogatives in addition to the protections and rights provided by law and the collective agreement.

At the employee's request, the employer in compliance with the provisions of the law and the contract shall make a deduction from the paycheck as a membership contribution to the union organization chosen by the employee. The percentage of workers who are union members is 39 percent (about 13,700 TIM S.p.A. employees).

In Brazil, TIM S.A. guarantees its employees the full right to union freedom and collective bargaining (through the union). All these rights are guaranteed by a collective agreement.

## GRI: 408-1 | Operations at significant risk for incidents of child labor

**[GRI 408-1a]** Within the BU Domestic perimeter, there are no activities at risk of incidents of child labor.

In Brazil, TIM S.A. does not identify this type of risk for employees.

**[GRI 408-1b]** Within the BU Domestic perimeter, there are no activities at risk of incidents of child labor.

In Brazil, TIM S.A. does not identify this type of risk for employees.

**[GRI 408-1c]** Within the BU Domestic perimeter, there are no activities at risk of incidents of child labor.

In Brazil, TIM S.A. does not identify this type of risk for employees.

## GRI: 409-1 | Operations at significant risk for incidents of forced or compulsory labor

**[GRI 409-1a]** In the BU Domestic Perimeter, no activities are at risk of incidents of forced or compulsory labor.

In Brazil, TIM S.A. does not identify this type of risk for employees.

**[GRI 409-1b]** For the Domestic BU, TIM's industrial relations model is inspired by intensifying the preventive phases of information and moments of union discussion, including through specific company bodies (in the form of committees), with the task of delving into specific matters in a technical manner, such as, by way of example, training, health and safety in the workplace, welfare and equal opportunities.

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In Brazil, TIM S.A. does not identify this type of risk for employees.

# Suppliers

**GRI 204-1** | Proportion of spending on local suppliers

**GRI 308-1** | New suppliers that have been screened using environmental criteria

**GRI 308-2** | Negative environmental impacts in the supply chain and actions taken

**GRI 407-1** | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

**GRI 408-1** | Operations and suppliers at significant risk for incidents of child labor

**GRI 409-1** | Operations and suppliers at significant risk for incidents of forced or compulsory labor

**GRI 414-1** | New suppliers that were screened using social criteria

**GRI 414-2** | Negative social impacts in the supply chain and actions taken

*Supply chain data in BU Domestic pertains to the following companies: Telecontact Center S.p.A. - Olivetti S.p.A. - TI Sparkle S.p.A. - TI Trust Technol. S.r.l. - TI Ventures S.r.l. - FIBERCOP S.p.A. - TIM MY BROKER S.r.l. - TIM SERVIZI DIGITALI S.p.A. - Telecom Italia S.p.A. - Noovle S.p.A. - TI SPARKLE GERMANY GmbH - TI SPARKLE NETHERLANDS BV - TI SPARKLE FRANCE S.a.s. - TI SPARKLE AUSTRIA GmbH - TI SPARKLE TURKEY - TI Sparkle Israel Ltd.*

## GRI: 204-1 Proportion of spending on local suppliers

**[GRI 204-1a]** With reference to the BU Domestic perimeter<sup>(1)</sup>, in 2022 total orders were placed with 2,813 suppliers of which 2,506 have production units in Italy and account for 93% of the total order.

Specifically, of the 2,506 suppliers, 97% are Italian companies and the remaining 3% are companies belonging to multinational corporations that conducted business through companies under Italian law.

In the BU Brazil, products are sourced as much as possible from local suppliers. The number of local Brazilian suppliers is 6,716, accounting for 98.8% of all BU Brazil suppliers and representing 98.8% of total orders.

**[GRI 204-1b]** In the Domestic BU, “local” is defined as suppliers having production units in the Italian territory.

In the BU Brazil, suppliers with production units in Brazil are considered local.

**[GRI 204-1c]** Group:

The main geographical areas in which the TIM Group operates are Italy and Brazil, for more details see GRI 2-6.

## GRI: 308-1 New suppliers that were screened using environmental criteria

## GRI 414-1 New suppliers that were screened using social criteria

**[GRI 308-1a] [GRI 414-1a]** In the Domestic BU, the selection of Group's suppliers takes place through a pre-contractual qualification, aimed at assessing their economic-financial and technical-organizational characteristics. If the result of this assessment - which includes compliance checks on environmental issues - is positive, suppliers are entered into the Group's supplier registry. In 2022, 100% of newly qualified suppliers committed in writing on behalf of themselves and any authorized subcontractors, contractors and employees to abide by the behavioral principles of the Group's Code of Ethics and Conduct.

A mandatory self-assessment questionnaire on sustainability issues was sent to suppliers with significant risk in Brazil in 2022, accounting for 22% of the total number of new suppliers. 100% of the 243 providers involved responded by the end of 2022. The results are used as guidance for future selection processes.

<sup>(1)</sup> Excluding Infragroup, Energy and delegated purchases.

## GRI: 308-2 Negative environmental impacts in the supply chain and actions taken

## GRI 414-2 Negative social impacts in the supply chain and actions taken

**[GRI 308-2a, b, c, d, e] [GRI 414-2a, b, c, d, e]** In the Domestic BU, the application of the process that defines activities aimed at improving supply chain sustainability continued during 2022. These activities involve the qualification, incoming quality and vendor rating stages. A matrix was created to divide purchasing markets into four classes, identifying those that were critical from the perspective of sustainability and economic impact.

Suppliers subject to sustainability audits conducted under the initiative called JAC (Joint Audit Cooperation)<sup>(2)</sup> are chosen from those in the highest risk classes. These audits are carried out by third-party specialized in the field and are repeated periodically to monitor the implementation of any corrective actions and, if successful, to verify that the level of performance found is maintained over time.

Where the JAC audit finds nonconformities against the required standard, a CAP (corrective action plan) is established, committing the supplier to resolve these nonconformities within the timeframe stipulated in the CAP.

During 2022, the JAC project resulted in 98 audits. During these audits, a total of 549 nonconformities were found, of which 104 related to environmental aspects and 445 to social aspects, with no “priority level” nonconformities.

To complement the JAC project, during 2022, TIM became a Value Chain Partner of the Open-es project. As part of this initiative, all active suppliers during 2022 were asked to register on this platform, where through the completion of a 114-question questionnaire the evaluation of the mentioned criteria through dedicated scoring takes place.

As of the end of 2022, 921 TIM suppliers have completed the ESG questionnaire on the Open-es platform. The detail of environmental and social impacts has not yet been processed.

For more information please refer to the Open-es website: <https://www.openes.io/it>

TIM S.A., in Brazil, performs qualification of all its suppliers related to activities considered critical to the socio-environmental management system. The socio-environmental qualification process is part of the process of contracting

<sup>(2)</sup> The Joint Audit Cooperation (<https://jac-initiative.com/>) was established under a memorandum of understanding signed in late 2009 by TIM, Orange and Deutsche Telekom. In the years since, the initiative has expanded in a major way, and by the end of 2022, 27 telephone operators from around the world are part of the association, representing 2.7 billion telephone lines and >51% of the turnover of the world's Top 50 telephone operators.

new suppliers for the company's supply chain and also contributes to check the qualification criteria of suppliers who already have a relationship with the company. Throughout 2022, 243 suppliers participating in tenders for the provision of goods and services were evaluated. Of the 243 suppliers, 5% did not pass the qualification process, being considered critical and possibly causing social and environmental impacts to the Company. This framework refers to suppliers who did not meet the minimum score for approval in the process.

Since suppliers who do not pass the qualification process are prevented from continuing with the procurement process, there was no need to implement improvement plans with suppliers (GRI 308-2 d,c).

In parallel with the process described above, 292 suppliers who already had active contracts with TIM were evaluated between 2021 and 2022, thus ensuring the qualification of 100% of suppliers responsible for activities considered critical from a socio-environmental perspective.

Requirements not met by providers refer to deficiencies in the documentation listed below:

- valid and current business license;
- environmental operation license and other compulsory licenses;
- licensing of the firefighting system with the fire department or the responsible agency.

### **GRI 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk**

**[GRI 407-1a.i, a.ii]** In the Domestic BU, suppliers operating in the following geographic areas are considered to have higher social risk: Asia, Central and South America, North Africa and Eastern Europe.

**[GRI 407-1b]** Based on what is expressly prescribed in the “Purchasing Policy for Products and Services,” and consistent with Group values, TIM requires (and promotes through its suppliers) respect for Freedom of Association and the right to collective bargaining. More details can be found in GRI indicators 2-23 and GRI 2-24.

The actions TIM puts in place for supplier controls vary depending on the risk level of the supplier and the amount of the purchase. Where any checks and/or audits show negative outcomes, appropriate corrective measures will be taken in accordance with the provisions of the contracts to ensure that the sustainability requirements set out in the guidelines are met.

## GRI 408-1 Operations and suppliers at significant risk for incidents of child labor

**[GRI 408-1a.i, a.ii, b.i, b.ii, c]** No suppliers at risk of incidents of child labor were identified during 2022 among BU Domestic suppliers.

Regarding the issue of child labor, suppliers operating in the geographic areas Asia, Central and South America, North Africa and Eastern Europe are considered to be at greater social risk.

With regard to child labor, the “Products and Services Purchasing Policy” stipulates that no use is made of, nor support provided in any way for, the employment of persons under 18 years of age, 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 at night. Again, where any checks and/or audits show negative results, appropriate corrective measures will be taken in accordance with the provisions of the contracts to ensure that the sustainability requirements set out in the guidelines are met.

In TIM S.A., activities are carried out according to the “Supplier Relationship Policy”, which establishes commitments to be followed to prevent risks related to child labor in the sphere of supply chain and business partnerships. The policy regulates key points such as fair competition, quality, safety, human rights and social-environmental responsibility. The contractual instruments also require companies to adhere to the Company’s Integrity Program and the principles

of the United Nations Global Compact, as well as expressly providing for the repudiation of child labor. Suppliers are also evaluated according to Brazilian labor laws by consulting the databases of the Business Pact for Integrity and Against Corruption and the Brazilian National Pact for the Elimination of Forced Labor. In case of proven incidents related to non-compliance with labor laws, the supplier may not provide services or products to the Company. No suppliers with a significant risk of child labor were identified in 2022.

## GRI 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor

**[GRI 409-1a.i, a.ii, b]** Regarding the issue related to forced or compulsory labor, suppliers operating in the geographic areas Asia, Central and South America, North Africa, and Eastern Europe are considered to be at higher social risk. During 2022, no suppliers of the Domestic BU were identified among the suppliers with these types of risks. The “Products and Services Purchasing Policy” prohibits any form of compulsory labor or service, obtained under the threat of any penalty or as a form of extinguishing a debt; workers cannot be required to leave any deposit at the beginning of employment or sign blank documentation waiving their rights at an earlier date of their exercise or legitimate waiver of exercise. Where checks and/or audits show negative outcomes, appropriate corrective measures will be taken in accordance with the provisions of the contracts to ensure that the sustainability requirements set out in the guidelines are met.



In TIM S.A., activities are carried out according to the “Supplier Relationship Policy”, which establishes commitments to be followed to prevent risks related to forced labor in the sphere of supply chain and business partnerships. The policy regulates key points such as fair competition, quality, safety, human rights and social-environmental responsibility. The contractual instruments also require companies to adhere to the Company’s Integrity Program and the principles of the United Nations Global Compact, as well as expressly provide for the repudiation

of forced or compulsory labor. Suppliers are also evaluated under Brazilian labor laws by consulting the databases of the Business Pact for Integrity and Against Corruption and the Brazilian National Pact for the Elimination of Forced Labor. In case of proven incidents related to non-compliance with labor laws, the supplier may not provide services or products to the Company. No providers with a significant risk of forced or compulsory labor were identified in 2022.

# Customers

**GRI 416-1** | Assessment of the health and safety impacts of product and service categories

**GRI 416-2** | Incidents of non-compliance concerning the health and safety impacts of products and services

**GRI 417-1** | Requirements for product and service information and labeling

**GRI 417-2** | Incidents of non-compliance concerning product and service information and labeling

**GRI 417-3** | Incidents of non-compliance concerning marketing communications

**GRI 418-1** | Substantiated complaints concerning breaches of customer privacy and losses of customer data

## GRI: 416-1 Assessment of the health and safety impacts of product and service categories

**[GRI 416-1a]** To verify that products placed on the market comply with health and safety standards, TIM Italia has special in-house facilities that plan “type tests” for the initial evaluation of products to company specifications and incoming quality checks of products passed into the marketing stage, taken both in Italy and at suppliers' production centers abroad. The Company also has laboratories that carry out tests on products marketed by the Group, particularly on electrical safety and electromagnetic emissions. In TIM S.p.A., the percentage of significant product and service categories in relation to which health and safety impacts are assessed with a view to improvement is 100 percent.

In 2022, at the request of TIM's Engineering functions, eight pieces of equipment for FWA<sup>(1)</sup>, FTTH<sup>(2)</sup> and FTTCab<sup>(3)</sup> networks intended to be installed at the customer site were checked in the labs; no equipment for incoming quality checks was received in the labs in 2022.

Specifically, for product liability, TIM verifies:

- energy efficiency aspects<sup>(4)</sup>;
- the functionality of the equipment under different environmental conditions of installation and use, including any accessory components for connection to the fixed network<sup>(5)</sup>;
- electromagnetic compatibility aspects<sup>(6)</sup>.

In order to promote sustainable development in its areas of influence, in addition to the legally mandated requirements for electrical safety, power consumption

(1) Fixed Wireless Access, which is a set of transmission systems developed to use given radio spectrum frequencies in order to provide broadband Internet connectivity services with nominal connection speeds of 1 giga byte per second (Gbps).

(2) Fiber To The Home, that is, fiber optics runs from the central office and directly into the apartments.

(3) Fiber To The Cabinet, or fiber optics that runs from the central office to the cabinet in the street closest to the apartments.

(4) Required by the 2009/125/EC ErP (Energy-related-Products) Directive, as equipment placed on the market is verified against the Stand-by/Off-mode (pause/off) power consumption and efficiency limits of European Regulations Nos. 1275/2008/EC, 801/2013/EC and 2019/1782/EC, for equipment and its external power supplies (present as accessory equipment).

(5) In fact, compliance with the temperature and humidity ranges stipulated by the European Telecommunications Standards Institute (ETSI) standards for the specific “service condition,” from which different levels of “severity” are derived, is controlled. The tests are conducted based on the ETSI EN 300019 family of standards, with the test methods provided by IEC-EN 60068-2-1 series (cold), 60068-2-2 (dry heat), 60068-2-14 (temperature changes), 60068-2-30 (humidity changes), 60068-2-78 (continuous humidity).

(6) Regulated by Directives 2014/30/EU and RED 2014/53/EU, in that there is a requirement to control the emission of unintentional electromagnetic signals - in order to avoid harmful interference to radiocommunications - and to meet certain requirements for immunity to electromagnetic interference. Continuous testing of terminals and network equipment is carried out at TIM to determine compliance with the requirements set by international standards for electromagnetic compatibility. In particular, the compliance of the equipment with the limits set by the standards to circumscribe the emissions of electromagnetic disturbances that, in addition to polluting the surrounding environment, may interfere with radio communications is verified.

and EMC<sup>(7)</sup> on marketed equipment, TIM also performs verifications of electrical and mechanical robustness requirements<sup>(8)</sup>, so as to contribute to the reduction of waste electrical and electronic equipment (WEEE) at source<sup>(9)</sup>. The addition of such robustness requirements, even within the TIM specifications of apparatus, requires the manufacturer to use appropriate protection devices on the electrical interfaces of the devices, such as overvoltage and overcurrent limiters, resulting in a reduction in the number of destructive type failures; with such technical arrangements, it follows that the functionality of the apparatuses is prolonged over time and, in cases of occasional damage, the same functionality can be easily recovered with the replacement of a few components/modules by repair centers.

With respect to equipment destined for customer sites, and transited through the laboratories during 2022 for verification of mandated requirements for CE marking, 50% of the products are modems/routers and accessories for VDSL<sup>(10)</sup> and FTTH services, 25% are FWA modems/routers, and 25% are ONT<sup>(11)</sup> optical network terminations.

By law, all telecommunications equipment sold in Brazil must be approved by

the ANATEL Regulatory Authority, which verifies, in its laboratories, compliance with Brazilian legislation regarding electrical and electromagnetic safety to ensure complete health and safety protection. There is ad hoc legislation that must be complied with for each type of equipment; TIM S.A. requires its suppliers to ensure that the devices have ANATEL's certificate of approval, and TIM S.A. guarantees in the internal certification only that the product will work with the network/frequency that they operate in Brazilian territory.

## GRI: 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services

**[GRI 416-2a]** The Entry Quality checklists for TIM S.p.A. provide for concurrent monitoring/surveillance of both “Requirements Impacting Product Health and Safety” and “Product Information and Labeling.” Therefore, instances of non-compliance with regulations involving a warning are coincident in number between “Requirements Impacting Product Health and Safety” and “Product Information and Labeling.”

(7) *Electro Magnetic Compatibility; regulates radio equipment in order to affix CE Marking.*

(8) *In accordance with the installation classes stipulated in European standard ETSI EN 300019.*

(9) *In fact, by placing equipment with an appropriate level of electrical and mechanical robustness on the market with respect to the expected stresses in the field, the failure rate of equipment and, therefore, the amount of waste to be sent to appropriate disposal centers is reduced.*

(10) *Very High Bit Rate Digital Subscriber Line is a cable xDSL communication technology that enables higher speed performance than its predecessor ADSL.*

(11) *Optical Network Terminal, which is an apparatus that transforms the optical signal and allows you to connect your modem to the fast network.*

### Incidents of noncompliance regarding health and safety impacts of products and services

TIM S.p.A.	2022
Instances of noncompliance with regulations resulting in a fine or a penalty	0
Instances of noncompliance with regulations resulting in a warning	3
Cases of non-compliance with self-regulatory codes	0

**[GRI 416-2b]** In Italy, in the last 3 years, for no product that has reached the final stage of commercialization, nonconformities have been found on health and safety for the customer according to European regulations.

No noncompliances with regulations and voluntary codes related to health and safety impacts of products and services have been identified in Brazil in the past three years.

### GRI: 417-1 Requirements for product and service information and labeling

**[GRI 417-1a]** Also in 2022, TIM required all of its fixed-line providers:

- the environmental statement;
- the declaration of origin of any tantalum used in the components (REACH)<sup>(12)</sup>;
- the user's manual;
- the document that includes security information;
- an indication of whether hazardous materials are present and how to dispose of them.

In addition to the above documents, for all new deliveries of the fixed, TIM continues to require the completion of an additional document called the “Sustainability Checklist,” in which all information related to sustainability from production to the end of the product's life is to be reported, highlighting the different types of materials and their disposal, including packaging materials.

For warranty service, TIM continues to use only remanufactured modems; the possibility of selling these remanufactured products to the public remains under consideration.

As far as mobile phone equipment is concerned, since they are consumer products that TIM merely resells and for which no customization is required, the Company merely requires suppliers to comply with national regulations.

<sup>(12)</sup> Registration, Evaluation, Authorisation and restriction of Chemicals” is a European Union Regulation 1907/2006 on the Registration, Evaluation, Authorisation and Restriction of Chemicals.

The sale of remanufactured smartphones, which started in the fall of 2019, continued into 2022, with remanufactured iPhone models listed on Consumer Mobile. These products are exclusively Class A+ to ensure the highest quality (original spare parts only) for the end customer.

To reduce environmental impact, following the example of new models, accessories and packaging materials have also been minimized in the packaging of remanufactured smartphones; chargers and earphones are no longer included in the packages.

From Q4 2022 TIM launched the TIM VALUTA service, which allows end customers to hand over their old smartphone and get a discount on the installment purchase of new smartphone.

For obsolete smartphones, TIM has for the past few years organized recycling activities, which take place through disposal characterized by online sales competitions. Products are composed in batches, and companies identified and authorized for this purpose may participate in the tenders. Sold products are disassembled afterwards so that all components of interest are recovered for their “second life cycle.”

In addition, to reduce the environmental impact in the use of plastic, TIM markets SIMs in half-card format (half the size of normal SIM cards) and uses recycled plastic for the card carrier<sup>(13)</sup>. This saves about 14 tons per year of plastic.

In Brazil, TIM does not have procedures on product and service information and labels.

#### [GRI 417-1b]

##### Information and labeling requirements for products and services

TIM S.p.A.	2022	2021	2020
Number of batches tested between fixed and mobile terminals	246	237	107
Number of lots with negative test results	3	3	0
Number of lots with negative test results and sanctioned	0	5	0
Number of lots with negative test results and for which a notice was materialized	3	3	0

In BU Brazil, there were no cases of anomalies in labeling of products and services during 2022.

(13) Supporting card.

## GRI: 417-2 Incidents of non-compliance concerning product and service information and labeling

**[GRI 417-2a]** Entry Quality checklists in the Domestic BU provide for concurrent monitoring/surveillance of both “Requirements Impacting Product Health and Safety” and “Product Information and Labeling.” Therefore, instances of non-compliance with regulations involving a warning are coincident in number between “Requirements Impacting Product Health and Safety” and “Product Information and Labeling.”

### Cases of non-compliance with regulations and/or self-regulatory codes on information and labeling of products and services

TIM S.p.A.	2022
Cases of non-compliance with self-regulatory codes	0
Instances of noncompliance with regulations resulting in a warning	3
Instances of noncompliance with regulations that result in a fine or penalty	0

**[GRI 417-2a]** In Brazil in the three-year period 2022-2020 for no products that reached the final stage of commercialization were found to have nonconformities concerning product disclosure and labeling.

**[GRI 417-2b]** The following list shows the results of the incoming quality checks carried out on “fixed and mobile terminals” performed for TIM S.p.A:

- 246 tested batches between fixed and mobile terminals;
- 3 lots with negative test results;
- 0 lots with negative test results and sanctioned;
- 3 lots with negative test results and for which a notice was concretized.

In Brazil, no cases of non-compliance with regulations on information and “labeling” of services were found in 2022.

## GRI: 417-3 Incidents of non-compliance concerning marketing communications

TIM SpA was not subject to any new investigation or sanction during 2022.

### Cases of non-compliance regarding marketing communications

TIM S.p.A.	2022	2021	2020
Number of instances of noncompliance with voluntary codes <sup>(14)</sup>	0	2	1
Number of instances of non-compliance with regulations materialized in fines or penalties	0	0	0
Number of instances of noncompliance with regulations materialized in a notice	0	0	0

In Brazil, the only notifications related to advertising and marketing communications are issued by CONAR, a non-governmental advertising self-regulatory body that assesses non-compliance with the Brazilian Code of Conduct for Advertising (“CBAP”) and may recommend to the company the modification/

correction or suspension of the advertisement (it does not impose fines); CONAR aims to ensure that every advertising message is true, honest, compliant with the country's laws and the principle of fair competition. Infringement proceedings may be terminated if the parties reach an agreement, if the perpetrators cease the infringement, or if the infringement has not been proven of the Code of Ethics.

In December 2021 TIM applied for disassociation from CONAR. As a result, TIM can no longer request the initiation of proceedings from the Authority, but can still be sued as an advertiser.

In BU Brazil, during 2022, there were no non-compliance cases regarding marketing communications.

<sup>(14)</sup> Cases are settled by the Institute of Advertising Self-Discipline, which operates in accordance with the Code of Commercial Communication and is competent in settling all advertising disputes involving member entities, directly or indirectly. Jury decisions never result in financial penalties but, where appropriate, in an order to desist from the disputed advertising release.

The two nonconformities in 2021 concerned:

- the case Wind Tre S.p.A. v. Telecom Italia S.p.A. (hearing on July 27, 2021). Telecommunications operators Windtre and Vodafone have filed a petition with the Advertising Self-Regulation Jury against TIM's communication advertising the TIM A-series wifi;
- the proceedings Windtre, Vodafone, Fastweb and Sky v. Telecom Italia S.p.A. (hearing on September 28, 2021). The mentioned operators petitioned the jury against TIM's advertisement that mainly advertised the offer of Serie A matches.

The 2020 non-compliance was related to the “Switch to Kena Mobile” telecommunication detected on commercial TV networks in June; TIM had ceased the advertising in question as of the date of the notification of the injunction.



## GRI: 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data

### [GRI 418-1]

#### Proven complaints regarding violations of customer privacy and loss of customer data

TIM S.p.A.	2022	2021	2020
Requests received from the Privacy Guarantor (number of cases/complaints reported)	85	70	15
Responses to requests to exercise customer privacy rights addressed to TIM Customer Care*	157,747	284,830	1,103,502
- of which responses to requests to exercise privacy rights addressed by TIM customers directly to the data protection officer	3,489	2,797	2,760
Total number detected of leaks, thefts or losses of customer data	1	0	0

As for the other TIM Group Companies with DPO (Data Protection Officer) perimeter, based on the data provided by the companies themselves, the 2022 totals are as follows:

BU Domestic	2022
Requests received from the Privacy Guarantor (number of cases/complaints reported):	0
Responses to requests for customers to exercise their privacy rights addressed to Group companies	18
- of which responses to requests to exercise privacy rights addressed by customers directly to the email boxes of the DPO of Group Companies	13
Total number detected of leaks, thefts or losses of customer data	0

**[GRI 418-1]** In BU Brazil, there were no complaints regarding privacy breaches and/or loss of customer data during 2022, according to local regulations.

**[GRI 418-1c]** Also during 2022, BU domestic continued to put in place the necessary actions to ensure the implementation in internal processes of the provisions on personal data security breaches (c.d. “data breach”), as well as to respond to requests for information from the Privacy Guarantor (as a result of customer reports/complaints) and to numerous requests from customers to exercise their privacy rights (e.g., aimed at knowing what personal data TIM processes, objecting to promotional calls, requesting rectification of inaccurate data or deletion of data). It is represented that requests for information from the Privacy Guarantor and requests from customers to exercise privacy rights have nothing to do with this indicator regarding “Proven complaints regarding customer privacy violations.”

In Brazil, the Data Protection Officer (DPO) of TIM S.A. has not become aware of any specific complaints related to privacy breaches and/or loss of data of the company's customers.

In 2022, TIM S.A. received more than 600 inquiries from customers regarding owners' rights.

Among the requests for privacy rights received so far, the most frequent have included:

- (i) Right of access;
- (ii) request for deletion of data;
- (iii) request to discontinue advertising messages.

# Civil Society

**GRI 201-1** | Direct economic value generated and distributed

**GRI 203-2** | Significant indirect economic impacts

**GRI 205-1** | Operations assessed for risks related to corruption

**GRI 205-2** | Communication and training about anti-corruption policies and procedures

**GRI 205-3** | Confirmed incidents of corruption and actions taken

**GRI 207-1** | Approach to tax

**GRI 207-2** | Tax governance, control, and risk management

**GRI 207-3** | Stakeholder engagement and management of concerns related to tax

**GRI 207-4** | Country-by-Country reporting

**GRI 413-2** | Operations with significant actual and potential negative impacts on local communities

**GRI 415-1** | Political contributions

## GRI: 201-1 Direct economic value generated and distributed

**[GRI 201-1a]** Economic value produced, distributed and retained.

### [GRI 201-1] TIM Group: Economic value produced, distributed and retained

TIM Group data (in millions of euros)	2022	2021	2020
(a) Total operating income and revenues	16,001	15,588	16,016
(b) Interest income and dividends received	276	165	311
(c) Capital gains (losses) on the realization of non-current assets	36	1	-11
(d) Directly produced economic value (a+b+c)	16,313	15,753	16,316
(e) Operating costs	7,369	7,467	6,542
(f) Personnel costs	3,180	2,941	2,639
(g) Lenders	1,439	1,580	1,643
(h) Duties and taxes	-476	110	676
(i) Distributed economic value (e+f+g+h)	11,512	12,098	11,500
Economic value retained (d-i)	4,801	3,655	4,816

**[GRI 201-1b]** The TIM Group's operating segments, organized with regard to the telecommunications business taking into account the relative geographical location, are as follows:

- Domestic: includes the activities in Italy related to voice and data services on fixed and mobile networks for end customers (retail) and other operators

(wholesale), the activities of the Telecom Italia Sparkle group, which, in the international field (in Europe, the Mediterranean and South America), operates in the development of fiber optic networks for wholesale customers, the activities of the company FiberCop S.p.A. for the provision of passive access services of the secondary network in copper and fiber, the activities of Noovle S.p.A. (Cloud and Edge computing solutions), the activities of Olivetti S.p.A. (products and services for Information Technology) and the support structures for the Domestic sector;

- Brazil: includes mobile and fixed telecommunications activities in Brazil (TIM S.A. group);
- Other assets: include financial companies (Telecom Italia Capital S.A. and Telecom Italia Finance S.A.) and other minor companies not closely linked to the “core business” of the TIM Group.

## GRI: 203-2 Significant indirect economic impacts

**[GRI 203-2a] [GRI 203-2b]** The digitization process in Italy, to which TIM is contributing with the development of fixed and mobile ultrabroadband and related services, is an indispensable resilience tool for the country's economy: the positive impacts that the adoption of broadband and ultrabroadband generate on the global economy are confirmed by several international studies, according to which a doubling of broadband speeds produces 1.5 percent GDP growth.

Ultrabroadband, particularly in recent years, has proven more necessary than ever to prevent a part of the population from being denied the chance of keeping up with the rest of the country: the digital divide is in danger of turning into an economic and social divide, which is why the overcoming of the digital divide throughout the country will be completed by 2024. In addition, the digital transition leads to ensuring inclusiveness by expanding the pool of citizens who use it and improving their digital skills.

### Coverage percentages

BU Domestic	2022	2021	2020
LTE coverage	99	99	99
Next Generation Plan coverage (fixed-line telephony) FTTX	89	89	85
of which FTTH	32	24	18

The European Commission annually publishes the results of the Digital Economy and Society Index (DESI) 2022, a report that presents data on human capital, connectivity, integration of digital technologies and digital public services in European countries. Italy's greatest acceleration is in the area of connectivity, thanks to TIM's strong contribution: Italy rises from 23rd in 2021 to 7th in 2022 in the rankings behind traditionally leading countries.

For more than 20 years in Italy, TIM has been a key player in the solidarity process linked to projects with humanitarian, scientific, social promotion and environmental protection purposes, which it supports by offering the possibility of making donations worth 2 euros by sending an SMS or 2, 5 or 10 euros through

a phone call from a landline to a dedicated number. The amounts collected are paid entirely by TIM to the Promoting Entities (Non-Profit Organizations, NGOs, NPOs, VOs), according to transparency and sustainability requirements without any withholding or application of tax rate. The new Self-Regulatory Code, issued by AGCOM - Autorità per le Garanzie nelle Comunicazioni, has provided for the establishment of 60 numbers dedicated to solidarity fundraising and governed by a special price list.

There are two free numbers designated for emergencies or natural disasters at the request of the Civil Defense Department.

More than 100 solidarity campaigns were activated by TIM in 2022, raising about 11 million euros. The largest funds were raised for scientific research initiatives, followed by medical and social welfare initiatives.

**[GRI 203-2a] [GRI 203-2b]** TIM S.A. is committed to bringing 4G coverage to 100 percent of Brazilian municipalities, as well as investing in the country's infrastructure and offering convenient deals to its customers. TIM's telecommunications activities generate positive impacts beyond business, as mobile telephony and broadband Internet services enable not only communication, but also create countless opportunities for people and businesses, acting as a powerful tool for innovation. This transformation is also linked to digital inclusion by providing connectivity in regions that do not have access to these resources, such as isolated communities, rural areas, and low-income areas. The digitization of various services and the migration of various activities to online platforms, particularly in the wake of the Covid-19 pandemic,

have contributed to the recognition of telecommunications as an essential service. In addition, Instituto TIM plays an important role in terms of impacting and transforming society through investments in social, educational and cultural initiatives and projects. TIM S.A.'s materiality matrix also presents the boundaries of these impacts (TIM, supply chain, consumption chain, post-consumption chain), whether they are direct (caused by TIM's business) or indirect (arising from TIM's relationships with its value chain).

More information on these economic impacts of TIM S.A. is available in the ESG Reports and on the Instituto TIM website: <https://institutotim.org.br/>. With regard to combating climate change, TIM S.A. understands that telecommunications play an important role in reducing greenhouse gas emissions, as they enable remote communication and reduce the need for travel and thus the consumption of fossil fuels, and the opportunities that come with this. For this reason, TIM S.A. invests in offering solutions based on new technologies, stimulating more efficient production models and logistic processes in various sectors, presenting itself as a promoter of a low greenhouse gas economy.

#### % for LTE, number of lines for FTTX and FTTH

BU Brazil	2022
LTE coverage	96
Next Generation Plan coverage (fixed-line telephony) FTTX	738,111
of which FTTH	722,697

## GRI: Operations assessed for risks related to corruption

**[GRI 205-1a]** TIM S.p.A. includes a special “anti-corruption clause” in its contracts. As part of this clause, compliance is required with both the anti-corruption regulations (including the U.S. (FCPA) and U.K. (Bribery Act), and the adopted Group Anti-Corruption Policy. There were 112 contracts submitted to the Compliance Department during 2022, of which 12 related to domestic subsidiaries of the Group.

In addition, the Company carries out due diligence activities on Third Parties, and during 2022 no red flags attributable to bribery hypotheses were revealed. Specifically, there were 1,729 due diligences conducted during 2022, of which about 970 related to Third Parties of domestic subsidiaries.

20 sensitive activities were identified by TIM S.A. in Brazil during 2022.

**[GRI 205-1b]** In 2019, TIM S.p.A. adopted the Anti-Corruption Management System (AMS), which applies to the Company, members of its corporate bodies, employees, and collaborators in various capacities.

In relation to subsidiaries, it is required to apply the AMS or appropriate safeguards for the prevention of corruption, to the extent that this is reasonable and proportionate in relation to the corruption risks to which these subsidiary organizations are exposed. With regard to the latter, it should be noted that TIM Brazil (March 2021), Olivetti S.p.A. (May 2022), Telecontact S.p.A. (July 2022) and Telecom Italia Trust Technologies S.r.l. (June 2022) are certified according to the

ISO 37001 standard. In addition, the certification process for TI Sparkle S.p.A. is ongoing.

As part of this Anti-Corruption Management System, TIM S.p.A. has assessed about 650 business units as per the UNI ISO 37001:2016 certification obtained by TIM S.p.A. in 2019 and reconfirmed in the years 2020-2021 and most recently in October 2022.

All of these business units (100%) are included in the assessment for corruption-related risks within TIM S.p.A. In addition, TIM S.p.A. has analyzed the significant risk scenarios regarding conduct attributable to both active corruption and passive corruption, in the direct and indirect form, and towards both public and private entities.

As a result of the Anti-Corruption Risk Assessment activities, TIM S.p.A. has identified the following areas at risk of active/passive forms of corruption:

- general - control environment - governance
- procurement, purchasing, supplier relations, accounts receivable
- investments (including network infrastructure and information systems)
- financial statements, financial reporting, accounting entries
- sales, marketing, customer acquisition (including commissioning)
- logistics (warehouse)
- human resources
- financial (treasury, finance-banking)
- fiscal.

In addition, with reference to the Organizational Model 231 of TIM S.p.A. and

with reference to the risk areas reported above, the following sensitive processes exposed to the risk of corruption have been identified:

- gifts and entertainment expenses
- events and sponsorships
- liberality/membership fees
- consulting, intermediation, relationships with business partners and suppliers or sub-suppliers and similar figures
- dispositive finance
- joint ventures, acquisitions and divestitures
- sale of goods and services
- relations with Institutions/Authorities
- authorizations and concessions
- subsidized finance
- judicial and arbitration proceedings
- fulfillments for the protection of occupational health and safety
- environmental protection requirements
- personnel selection, recruitment and management
- operations carried out by top management.

With reference to Third Parties, TIM S.p.A. has identified relationships that may present risk profiles in relation to anti-corruption regulations. These risks may arise from (i) the type or nature of the relationship (Relevant Relationships) and (ii) the characteristics of the third party or the activities performed by it (Relevant Third Parties).

With regard to Relevant Relationships, the following have been identified:

- relations with government agencies: these interactions concern particularly relations with the PA in a leading role, for obtaining administrative or jurisdictional measures, for carrying out audits and inspections, for fulfilling regulatory obligations, or for obtaining financing;
- relationships with customers and suppliers: these interactions affect the entire business cycle of the Company, and have risk profiles for both Active and Passive Corruption;
- relations with other private entities: these are interactions with private entities of any nature that carry out institutional, professional or business activities (e.g., rating agencies, financing entities of projects in which TIM S.p.A. participates or companies that participate in temporary business groupings or consortia), in the performance of which TIM S.p.A. may have an interest because advantages or disadvantages for the Company may depend on it. Relevant Relationships do not include relationships with individual customers who have an existing relationship with the Company as end users of products/ services sold by TIM S.p.A.

With regard to Relevant Third Parties, the following have been identified:

- beneficiaries of sponsorships and contributions: these are individuals who are beneficiaries of sponsorship initiatives - so-called sponsees -, donations of a liberal nature typically related to projects of a social nature or contributions in cash, in kind or credits in exchange for subscription of participation shares;
- consultants and professional service providers, agents and brokers, Business Partners, non-employee collaborators: these are service providers, including

sub-agents and similar figures, whom TIM S.p.A. may use in the pursuit of its business activities;

- suppliers of goods and services: these are the suppliers of goods and services, including sub-suppliers and similar figures, other than those mentioned in the previous point;
- Third Parties Involved in extraordinary transactions: these are the target companies of possible extraordinary transactions such as mergers or acquisitions;
- partners in joint ventures: these are the legal entities with which TIM S.p.A. enters into joint venture agreements and/or establishes stable corporate structures, for the joint management of a particular business or project;
- candidates for employment: these are figures subjected to evaluation with regard to reputational aspects, including possible situations of conflict of interest, for the purpose of inclusion in the corporate workforce.

In addition, job positions with non-low risk of Corruption (Relevant Positions) are identified:

- manager or employee of the Company who represents or acts on behalf of TIM S.p.A. with reference to activities or relationships with third parties that present Corruption risk profiles;
- manager or employee of the Company who has the role of manager with decision-making functions in processes that have profiles of risk Corruption.

Finally, the Company is in the process of equipping itself with an IT support system aimed at assessing the risk of third parties by conducting Anticorruption Due Diligence activities.

In Brazil, according to TIM S.A.'s Corporate Risk Management Policy, the TIM Group adopts a Corporate Risk Management (ERM) process for the identification and management of risks that may compromise business objectives and the effective adoption of related mitigation measures. In this context, the Compliance Board is involved in the process of risk identification and assessment, including the risk of corruption and the respective mitigation controls and ongoing monitoring of certain activities considered sensitive for this type of practice.

The Governance & Integrity Compliance area conducts an annual risk assessment of the Sensitive Activities and relates them to the respective relevant processes, the areas and functions responsible for those processes, the stakeholders involved, the risk scenarios and the respective mapped controls, the evaluation of the results of the controls, and the risk assessment. The objective of the corruption risk assessment is to enable the Company to establish the basis for the Anti-Corruption Management System (SGAA in Portuguese) through:

- the identification of the main corruption risks that the SGAA intends to monitor;
- in assessing these risks and the adequacy of the controls implemented to mitigate them.

In particular, specific factors such as the location and sectors of activities, the nature and complexity of activities, the presence of third parties, and the relationships held are taken into consideration to carry out the corruption risk assessment. In carrying out these activities TIM Brasil:

- identifies corruption risks that can reasonably be expected, identifying processes susceptible to corruption;
- analyzes and evaluates the risks mentioned, documenting the methodologies used, to map the processes at risk;
- assesses the adequacy and effectiveness of TIM's existing controls to mitigate identified corruption risks.

The Company establishes criteria for assessing corruption risk, taking into account TIM's internal policies and objectives. This assessment is carried out and verified by the Compliance Function as part of the risk assessment:

- on a periodic basis, so that changes and new information can be properly evaluated on the basis of terms and deadlines established for that purpose;
- and in case of a significant change in TIM's structure or business.

In order to combat corruption, special attention and constant monitoring of certain activities considered sensitive for this type of practice (Sensitive Activities) is essential. The result of 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. In general, the assessment of corruption risk thus depends on:

- the type or nature of the relationship (sensitive relationships);
- the characteristics of third parties or the activities they perform (sensitive third parties);
- the role held by the employee (sensitive roles);
- certain activities considered sensitive (sensitive activities).



Following the risk assessment process and identification of sensitive activities under the anti-corruption laws applicable to the TIM Group in Brazil, the Company has identified the following sensitive activities, detailed below:

- Agreements;
- Judicial, administrative, and arbitration proceedings;
- Permits and licenses;
- Relations with public officials, institutions, authorities, unions and associations;
- Receiving and/or offering goods, services and/or invitations to events free of charge;
- Entertainment expenses;
- Events;
- Commercial and institutional sponsorships;
- Donations to nonprofits;
- Financing and subsidized loans;
- Purchase of goods and services;
- Sales of goods and services;
- Hiring of employees;
- Management of employee variable compensation incentives;
- Health, safety and environment;
- Investments;
- Business partners;
- Payments;
- Acquisition and disposal of holdings and/or assets and/or incorporation of companies;
- Transactions carried out directly by the CEO of the Company.

## GRI: 205-2 Communication and training about anti-corruption policies and procedures

**[GRI 205-2a]** The Board of Directors of TIM S.p.A approves the Anti-corruption Policy, Code of Ethics and Conduct, 231 Organizational Model, and Compliance Management Activity Plan related to TIM S.p.A.'s Anti-corruption Management System and receives information on its progress.

Similarly, the Boards of Directors of domestic subsidiaries approve the Group's Code of Ethics and Conduct, its own 231 Organizational Model, the AMS in the case of ISO 37001-certified companies, as well as the Anti-corruption Policy (previous version, in the case of non-ISO 37001-certified companies).

**[GRI 205-2b]** Group employees, for 2022, have been informed of the anti-corruption policies and procedures as below:

	GROUP		BU DOMESTIC		BU BRAZIL	
Executives	534	92%	469	92%	64	88%
Squares	4,602	99%	4,260	100%	336	90%
Employees	44,737	97%	36,043	96%	8,691	99%
Workers	155	97%	155	97%	0	

**[GRI 205-2c]** TIM S.p.A. publishes its Code of Ethics and Conduct, Anti-Corruption Policy and Anti-Corruption Manifesto on the Group Supplier Portal.

Key Partners can be providers of goods and services, professional consultants/lenders, indirect business network partners, as well as OLOs. In addition, the Anti-Corruption Policy, the Code of Ethics and Conduct and the 231 Organizational Model are disseminated to all external stakeholders through publication both on the website and on the intranet.

Lastly, as mentioned above, TIM S.p.A. includes a special “anti-corruption clause” in its contracts with its business partners.

As part of this clause, acknowledgment of the Code of Ethics and Conduct, the TIM S.p.A. Anti-Corruption Policy and the 231 Organizational Model is required.

In particular, Order Vouchers are issued with the clause requiring acceptance of the documents mentioned above.

**[GRI 205-2d]** The Board of Directors of TIM S.p.A conducts induction sessions as needed, which also include issues in anti-corruption compliance.

**[GRI 205-2e]** Group employees, for 2022, who have received training on anti-corruption policies and procedures are shown in the tables below:

	GROUP		BU DOMESTIC		BU BRAZIL	
Executives	214	37%	149	29%	64	88%
Squares	4,227	91%	3,891	91%	330	88%
Employees	36,254	78%	27,669	74%	8,582	98%
Workers		0		0		0

## GRI: 205-3 Confirmed incidents of corruption and actions taken

**[GRI 205-3a]** In the past 3 years, no incidents of corruption have been established either in TIM S.p.A. or in the Group's domestic subsidiaries. In addition, during the same period, there were no corruption-related legal proceedings initiated against either TIM S.p.A. or domestic subsidiaries. As a result, none of the Group's domestic subsidiaries have registered any penalties or entered into plea bargains in connection with corruption incidents in the past 3 years.

No cases of corruption were recorded in Brazil in 2022.

**[GRI 205-3b]** In the past 3 years, neither in TIM S.p.A. nor in any domestic subsidiary of the Group has there been an incident of corruption. Therefore, within this perimeter, no employee has been dismissed or charged for corruption. No cases of corruption were recorded in Brazil in 2022.

**[GRI 205-3c]** With regard to suppliers, neither TIM S.p.A. nor the Group's domestic subsidiaries have terminated a contract for reasons attributable to corruption in the past 3 years.

No cases of corruption were recorded in Brazil in 2022.

**[GRI 205-3d]** There have been no legal proceedings on corruption grounds against either TIM S.p.A. or the Group's domestic subsidiaries in the past 3 years. It follows that with regard to this perimeter, no sanctions were recorded, nor were any plea bargains concluded in connection with corruption incidents.

No cases of corruption were recorded in Brazil in 2022.

## GRI: 207-1 Approach to tax

Since 2017, TIM S.p.A. has adopted its own tax strategy for the purpose of defining the objectives and principles adopted by the company in managing taxation, both at the corporate level and in its relations with tax authorities.

This strategy is approved by the TIM Group Board of Directors and is updated promptly in case of changes at the strategic and/or operational level.

TIM S.p.A., in adherence to the “general principles” set forth in the Code of Ethics and in the respect and autonomy of its management choices, intends to pursue a tax strategy inspired by principles of honesty, fairness and compliance with tax regulations.

To this end, TIM is committed to:

- operating at all times in compliance with tax laws and regulations in all countries in which it operates, observing their spirit and purpose, ensuring effective oversight of taxation through (i) monitoring legislative developments, (ii) managing its application, and (iii) regular reporting and necessary corporate training to disseminate knowledge at all levels through periodic and systematic deployment;
- not make acquisitions or investments in states or territories with preferential tax regimes, unless they are functional to the company's business purposes

and have as their objective the development of business activities included in the corporate purpose;

- Carry out cross-border intercompany transactions in accordance with free competition principle as established by the OECD (Transfer Pricing Guidelines).

## GRI: 207-2 Tax governance, control, and risk management

**[GRI 207-2a]** The Board of Directors of TIM S.p.A., whose evaluations and decisions are supported by adequate preliminary activity by the Audit and Risk Committee, is responsible for periodically verifying the adequacy of the internal control and risk management system, of which the tax risk management system is an integral part, as well as its effective functioning.

The TIM Group has adopted a fiscal risk management and control system that includes a governance model designed to ensure that:

- i. top management is informed of the fiscal impacts related to all strategic and operational business operations, planned and to be implemented, in order to ensure the consistency of business decisions with the defined fiscal strategy;
- ii. the Tax Function is involved in the performance of ordinary and extraordinary business activities, in order to ensure a preliminary assessment of the tax

implications of these activities, to ensure the proper management of the tax variable.

To this end, the incentive system of the Tax Function does not include specific targets related to tax rate reduction.

The TIM Group trains and supports all personnel involved in the management of tax-relevant activities, not limiting itself to resources specifically dedicated to tax matters, in order to ensure that all employees have the right skills and experience to fulfill their responsibilities.

In order to achieve the above goal, the Group also invests in the professional growth of staff through specific training plans.

TIM employees and management at all levels are expected to model their behavior on the “general principles” set forth in the Code of Ethics, such as honesty, fairness, transparency, confidentiality, impartiality, diligence, loyalty and mutual respect.

Failure to comply with these principles may result in legal action being taken and measures being taken against the recipients, consistent with the provisions of the Code of Ethics.

Top management informs management and all employees involved about the aforementioned values and codes of conduct declined in the fiscal sphere, appropriately incentivizing and recognizing virtuous behavior and sanctioning recognized violations, according to the “Tone at the Top” principle.

TIM's goal is to minimize fiscal risks.

To this end, the Group:

- does not implement transactions that primarily pursue a tax advantage and do not respond to business logic, i.e., transactions carried out “artificially” for the sole purpose of reducing taxation;
- in cases where tax regulations nurture interpretive doubts or enforcement difficulties, pursues a reasonable line of interpretation, inspired by the principles of legality;
- implements constant interlocution with the Tax Authorities on potentially contentious or questionable issues of interpretation in cases of complex corporate, financial or commercial transactions with tax-relevant outcomes.

To ensure effective tax risk management, TIM has adopted a system for the detection, measurement, management and control of tax risk (Tax Control Framework), governed by a specific Tax Policy, which provides:

1. a clear assignment of roles and responsibilities;
2. effective procedures for detecting, measuring, managing and controlling fiscal risks;
3. effective internal procedures designed to ensure, at all levels of the company, compliance with tax obligations;
4. effective procedures to remedy any deficiencies found in the operation of the system and to activate the necessary corrective actions;
5. reporting to the management bodies through the provision of a report, at least annually, on the activities carried out.

**[GRI 207-2b]** The TIM Group, in observance of the principles of honesty, fairness and compliance with tax regulations, considers it essential to prevent the risk of incurring unethical or illegal behavior, with consequent reputational as well as financial impacts.

To this end, each function is required to seek prior advice from the relevant Tax Function on the tax implications of any facts with a novel character that affect its scope of operations.

In addition, the Group has adopted a reporting procedure (so-called whistleblowing procedure) through which each employee is required to report, using a special portal, cases of suspected fraud with tax impacts, or the risk of TIM incurring violations of tax regulations as a result of relevant conduct by third parties, of which he or she has become aware.

Relevant conduct to be reported concerns actions or omissions made by third parties that, by resulting in an untrue or fraudulent representation of facts, may mislead the Company regarding the application of relevant tax regulations.

**[GRI 207-2c]** The tax information to be reported in financial reporting is prepared by the Tax Department, which certifies its accuracy and completeness. There is no ad hoc external assurance report, but the data are reviewed in the broader audit work conducted by EY on the Consolidated Financial Statements.

## **GRI: 207-3 Stakeholder engagement and management of concerns related to tax**

The TIM Group, in compliance with the principle of “Corporate Responsibility,” acts according to the values of honesty and integrity in managing the tax variable, protecting the interests of all stakeholders, being aware that tax revenues constitute one of the main sources of contribution to the economic and social development of the countries in which it operates.

With a view to imbuing its relations with the tax authorities with the principle of cooperation and good faith, TIM has joined the Collaborative Compliance Scheme (better known internationally as Cooperative Compliance) on a voluntary basis, effective from the 2017 tax year. This scheme involves a new way of interacting with the tax authorities, aimed at reducing the degree of uncertainty in the management of tax issues and preventing the risk of tax disputes.

In this regard, TIM, in particular, undertakes to:

- clearly and transparently communicate to the Tax Authorities any changes in tax strategy, medium- and long-term tax planning, and possible risks associated with the most relevant transactions;
- provide correct, accurate and timely information and respond promptly to questions and requests for information received from the Tax Authorities;
- resolve any uncertain tax positions in a timely manner prior to the filing of tax returns, and, if disagreements subsequently arise, work out an agreement with the Tax Authorities to resolve them.

With reference, however, to Brazil, the TIM Group has locally adhered to a Cooperative Compliance program developed by the State of São Paulo (so-called. “Nos Conformes”). In addition, the TIM Group, along with some other large contributors in Brazil, has joined a project (c.d. “Confia Program”) for the future introduction of a Cooperative Compliance program in federal taxation as well. In addition, TIM adheres to the transfer pricing documentation requirements in accordance with the OECD Guidelines, which are based on the so-called “three-tiered approach,” consisting of Master File, Country File and Country-by-Country Report.

TIM acts in a transparent and collaborative manner with all Italian and European institutions and trade associations to support the development of effective systems in the countries in which it operates.

In particular, certain TIM representatives actively participate in Tax Policy activities carried out by Italian and EU trade and business associations, both in general business and industry-specific contexts; the same activity is also carried out by the TIM Group in Brazil, with reference to local operations.

## **GRI: 207-4 Country by country reporting**

The amount of key financial, economic and fiscal indicators for the jurisdictions in which the TIM Group operates is given at the end of this chapter. It should be noted that these indicators refer to the year 2021, and are those reported in the “Country by Country” reporting required by Art. 1, comm. 145 and 146 of Law 28/12/ 2015, No. 208, submitted by the TIM Group in 2022.

## **GRI: 413-2 Operations with significant actual and potential negative impacts on local communities**

The construction of network infrastructures in some parts of Italy can sometimes have negative impacts on the local community in terms of aesthetic alteration of the environment or noise during their construction. All network facilities built by TIM are subject to permits issued by the relevant authorities and ensure the coexistence of the public interest in network coverage throughout the country and the guarantee of safety of the facilities themselves for the community. With particular reference to the construction of mobile network infrastructure (radio-base stations), all regulations and processes to ensure electromagnetic pollution limits, which are particularly stringent in our country, are respected.

In Brazil, TIM S.A. employs teams for licensing and compliance monitoring of the company's sites, such as Radio Base Stations (ERBs), technical buildings, and Data Centers.

ERBs result in impacts at the time of their construction due to the local movement of workers and works. In the operation phase, the main impact is associated with non-ionizing radiation emissions, which are the subject of theoretical and practical reports in order to ensure the safety of the facilities for society, within the limits set by the World Health Organization (WHO). Upon request, the Company also measures the noise level of network facilities.

In Brazil, L. 6,938/1981 and National Council on the Environment (Conama) Resolution No. 237/97 do not consider ERBs as potentially polluting.

Therefore, they are not subject to environmental licensing. TIM, however, understands that in order to fulfill the social function of telecommunication facilities, namely to generate digital inclusion, it is sometimes necessary to install such equipment in areas of biodiversity concern, such as Environmental Protection Areas (EPAs) or Permanent Protection Areas (APPs). In even less frequent cases, vegetation suppression may be required, which occurs only if the installation is to be carried out in an area with dense vegetation, with no possible geographic alternatives.

In such cases, installations are authorized by the government, complying with established legal and technical standards to avoid, mitigate or compensate for resulting environmental impacts.

TIM S.A.'s assets include more than 23,000 ERBs, licensed by Anatel, in line with local regulations, such as zoning and environmental licenses, when applicable.

TIM S.A. recognizes that although the negative impacts of its operation are not significant compared to other production activities that generate effects on the surrounding territory or communities, the installation of facilities in remote areas may cause inconvenience to residents of such areas due to, for example, the visual impact of antennas.

Although this is not a significant impact, TIM invests in the development of innovations such as biosites, with the goal of reducing this type of impact.

## GRI: 415-1 Political contributions

The Code of Ethics and Conduct explicitly prohibits direct or indirect disbursements, contributions, benefits or other advantages to political parties or movements and labor unions, or to their representatives or candidates.

TIM Brasil Group companies do not provide, directly or indirectly, contributions, advantages and other benefits to political parties, movements, representatives or candidates and/or trade union organizations, except in cases provided for by law.

## FY 2021

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intercompany transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Argentina	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	7	9,437	-	-1,156	8,737	3,259	-	-42	-
Austria	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	1	-	1,683	87	541	2,735	291	56	27
Belgium	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	-	1,011	89	306	2,200	332	23	23
Brazil	Landline and mobile phone services.	9,336	2,848,115	5,364	582,878	1,724,646	3,322,338	1,919,327	1,011	-31,228
									The amount shown is determined net of offsetting made against credits for taxes other than income taxes, amounting to €/000 22,964	The amount is net of reversal for income taxes set aside in previous years, amounting to €/000 97,867
Bulgaria	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	-	687	13	1,245	51	42	-	3
Chile	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	1	4,613	-	-1,001	6,647	9,146	-	66	66
Colombia	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	21	1,639	82	1,877	3,381	-	-19	52
France	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	19	785	16,878	910	8,327	18,295	2,271	285	250

continued



Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intercompany transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Germany	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	5	-	14,609	1,397	10,487	25,625	17,339	262	585
Greece	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	38	8,338	6,308	-1,027	28,852	369	11,227	123	-
Israel	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	15	21,569	3,297	2,918	3,826	1,823	22,121	1,729	1,803
Italy	In Italy, the TIM Group operates in the entire chain of advanced communications services including: fixed, mobile and Internet telecommunications, multimedia and television, Information Technology products and services, and research and development. In addition, coordination functions are exercised by Italy with respect to subsidiaries-direct and indirect-nonresident companies.	42,347	12,153,230	3,256,403	-4,079,691	11,355,666	11,918,007	3,754,636	205,003	23,485
Luxembourg	Financial activities, and subholding	13	-	85	117,027	14	1,821,028	242,212	32,355	15,428
Malta	Provision of administrative, management and support services; sale of IT solutions.	-	230	-	-157	4	2	-	-	-
Nigeria	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	423	-	-59	39	29	-	11	-
Holland	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	-	3,776	188	4,670	18	4,636	43	28
Panama	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	4	6,574	84	-261	4,466	3,820	-133	22	25

continued

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intercompany transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Peru	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	3,013	1,238	-722	3,390	16,175	-	-106	115
Puerto Rico	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	415	1,735	37	4,321	2,693	260	2	-
United Kingdom	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	10	387	8,734	-545	9,818	11,476	4,131	8	53
Czech Republic	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	4	220	-0	10	270	-	11	-0
Republic of San Marino	Landline and mobile phone services	40	9,633	297	2,071	1,719	1,886	1,743	491	303
Romania	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	2	150	234	19	30	611	-	4	4
Russia	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	4	106	369	0	16	100	42	-0	0
Singapore	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	12	32,778	8,663	-482	437	4,521	-	-	-
Slovakia	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	10	165	3	6	305	-	-	8

continued

Country	Description of the main activities of the organization	Employees (no.)	Revenues from sales to third parties (€/000)	Revenues from intercompany transactions (€/000)	Profit/loss (€/000)	Assets (€/000)	Share capital (€/000)	Reserves (€/000)	Income taxes paid (€/000)	Accrued income taxes (€/000)
Spain	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	4	-	1,413	74	155	1,687	519	-	-
United States of America	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	44	163,968	66,133	4,044	32,673	13,738	39,416	68	132
Switzerland	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services; sale of IT solutions.	-	461	841	-158	335	1,376	553	2	11
Turkey	Provision of administrative services, support in the technical management of equipment pertaining to the local network and management of the relationship with local customers for the provision of international telecommunication services.	27	15,828	232	-1,460	12,630	15,849	-	-	-
Venezuela	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	322	-	-747	-	419	-	36	-
Virgin Island US	Provision of administrative and support services in the technical management of equipment pertaining to the local area network, for the provision of international telecommunication services.	-	7	1,392	74	2,147	1	5,183	1	-

Note: The scope of disclosure and data reported refer to “country-by-country” reporting for the fiscal year 2021. Companies residing in Argentina: TI Sparkle Argentina S.A.; companies residing in Austria: TI Sparkle Austria GmbH; companies residing in Belgium: TI Sparkle Belgium S.P.R.L. - B.V.B.A.; companies residing in Brazil: I-Systems S.A., TI Latam Participacoes e Gestao Administrativa LTD, TI Sparkle Brasil Participacoes LTDA, TI Sparkle Brasil Telecomunicacoes LTDA, TIAudit Compliance Latam S.A., TIM Brasil Servicos e Participacoes, TIM S.A.; companies residing in Bulgaria: TI Sparkle Bulgaria EOOD; companies residing in Chile: TI Sparkle Chile SPA; companies residing in Colombia: TI Sparkle Colombia LTDA; companies residing in France: Noovle France SASU, TI Sparkle France SAS; companies residing in Germany: Olivetti Deutschland GmbH, TI Sparkle Germany GmbH; companies residing in Greece: TI Sparkle Greece S.A.; companies residing in Israel: MED 1 Submarine Cables LTD, TI Sparkle Israel LTD; companies residing in Italy: Telecom Italia S.p.A. (also TIM S.p.A.), CD Fiber S.r.l., Daphne 3 S.p.A., Fibercop S.p.A., Global Space Tre S.r.l., Noovle AI S.r.l., Noovle S.p.A. benefit company, Noovle Sicilia - società consortile a r.l., Olivetti Payment Solutions S.p.A., Olivetti S.p.A. benefit company, Staer Sistemi S.r.l., Telecom Italia Sparkle S.p.A., Telecom Italia Trust Technologies S.r.l., Telecom Italia Ventures S.r.l., Telecontact Center S.p.A., Telenergia S.r.l., Telsy Elettronica e Telecomunicazioni S.p.A., Tiesse S.C.P.A., TIM My Broker S.r.l., TIM Retail S.r.l., TIM Servizi Digitali S.p.A.; companies residing in Luxembourg: Telecom Italia Capital S.A., Telecom Italia Finance S.A.; companies residing in Malta: Noovle Malta LTD; resident companies in Nigeria: TIS Lagos Limited; companies resident in the Netherlands: TI Sparkle Netherlands B.V.; companies residing in Panama: Panama Digital Gateway S.A., TI Sparkle Panama S.A.; companies residing in Peru: TI Sparkle Peru S.A.; companies residing in Puerto Rico: TI Sparkle Puerto Rico LLC; companies residing in the United Kingdom: Olivetti UK LTD, TI Sparkle UK LTD; companies residing in Romania: TI Sparkle Romania SRL; companies residing in Russia: TI Sparkle Russia LLC; companies residing in the Czech Republic: TI Sparkle Czech S.R.O.; companies residing in the Republic of San Marino: Telecom Italia San Marino S.p.A., Telefonía Mobile Sammarinese S.p.A.; companies residing in Singapore: TI Sparkle Singapore PTE/LTD; companies residing in Slovakia: Noovle Slovakia S.R.O., TI Sparkle Slovakia S.R.O.; companies residing in Spain: TI Sparkle Spain Telecommunications S.L.; companies residing in the United States of America: TI Sparkle Americas Inc, TI Sparkle North America Inc; companies residing in Switzerland: Noovle International SAGL, TI Sparkle Switzerland GmbH; companies residing in Turkey: TI Sparkle Turkey Telekomunikasyon Hizmetleri Anonim Sirketi; companies residing in Venezuela: TI Sparkle Venezuela C.A.; companies residing in Virgin Island US: TI Sparkle St. Croix LLC.

# Industry Business Community

## GRI: 206-1 | Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

### [GRI 206-1a]

#### Number of pending or concluded legal actions for BU Domestic

	2022	2021	2020
Anti-competitive behavior	2	2	1
Violations of antitrust and monopolistic practice regulations	1	1	1

For more information on litigation, please refer to Note 24 “Pending litigation and court actions, other information, commitments and guarantees” of the Annual Financial Report available at the following link:

<https://www.gruppotim.it/en/investors/reports-presentations/financial-reports.html>.

#### Number of legal actions pending or concluded for BU Brazil

	2022
Anti-competitive behavior	0
Violations of antitrust and monopolistic practice regulations	0

**[GRI 206-1b]** With reference to anticompetitive behavior for BU Domestic, actions are still pending in the first instance. With regard to violations of antitrust and monopolistic practice regulations, the verdict in 2021 was favorable for TIM and is continuing in the second instance.

In BU Brazil, no new proceedings were included in 2022. The 12 proceedings identified in 2021 are reported, with updates on their progress.

# Linkage Legislative Decree 254/2016

Scope Legislative Decree 254/2016	Material Topic 2022
Environment	CIRCULAR ECONOMY AND WASTE PRODUCTION
	CLIMATE CHANGE
	ENERGY TRANSITION
	SUSTAINABLE SUPPLY CHAIN
Social	CUSTOMER INTERACTION AND SERVICE TRANSPARENCY
	DIGITAL INCLUSION
	RESILIENCE TO PHYSICAL, PUBLIC HEALTH, AND SOCIOPOLITICAL RISKS
	CYBERBULLYING, CHILD PORNOGRAPHY, ONLINE GAMBLING
	COMMUNITY AND STAKEHOLDER RELATIONS
	PRIVACY AND CYBERSECURITY
	INFRASTRUCTURES AND EMERGING TECHNOLOGIES
Staff	LEGAL AND REGULATORY CONTEXT MANAGEMENT
	DEVELOPMENT AND MOTIVATION OF TIM EMPLOYEES
	EMPLOYEE HEALTH AND SAFETY
Respect for human rights	EQUAL PAY AND OPPORTUNITY
	HUMAN RIGHTS DEFENSE
Fighting Corruption	Scope reported even if not included in the 16 material topics 2022*

\* The 2021 material topic “Ethics and Corporate Governance” since it is not representative of a major impact generated by the Group externally is not considered as an impact topic for the 2022 Report. Combating Corruption will still be regularly reported according to GRI indicator 205 (Anti-corruption).

# GRI Content Index

## GRI CONTENT INDEX “In Accordance with”

GRI Standard	Disclosure	Page	Omissions and description
Statement of Use	TIM S.p.A. has reported with the GRI Standards for the period from January 1 to December 31, 2022		
GRI 1 USED	GRI 1: Foundation 2021		
GRI Sectors standard applied	N.A.		
General Disclosure			
<b>GRI 2: General Disclosure</b>			
	GRI 2-1: Organizational details	88	
	GRI 2-2: Entities included in the organization's sustainability reporting	88	
	GRI 2-3: Reporting period, frequency and contact point	89	
	GRI 2-4: Restatements of information	89	
	GRI 2-5: External assurance	89	
	GRI 2-6: Activities, value chain and other business relationships	91	
	GRI 2-7: Employees	93	
	GRI 2-8: Workers who are not employees		At present, data required by GRI 2-8 are not available, due to complexity in data collection process. The TIM Group is committed in the coming years to initiate a process of data collection and reporting, starting with the most significant categories of non-employee workers (e.g., call centers and network enterprises).

continued

GRI Standard	Disclosure	Page	Omissions and description
	GRI 2-9: Governance structure and composition	94	
	GRI 2-10: Nomination and selection of the highest governance body	96	
	GRI 2-11: Chair of the highest governance body	97	
	GRI 2-12: Role of the highest governance body in overseeing the management of impacts	97	
	GRI 2-13: Delegation of responsibility for managing impacts	98	
	GRI 2-14: Role of the highest governance body in sustainability reporting	99	
	GRI 2-15: Conflicts of interest	99	
	GRI 2-16: Communication of critical concerns	99	
	GRI 2-17: Collective knowledge of the highest governance body	100	
	GRI 2-18: Evaluation of the performance of the highest governance body	100	
	GRI 2-19: Remuneration policies	101	
	GRI 2-20: Process to determine remuneration	103	
	GRI 2-21: Annual total compensation ratio		<i>Data not shown for confidentiality reasons</i>
	GRI 2-22: Statement on sustainable development strategy	2	
	GRI 2-23: Policy commitments	104	
	GRI 2-24: Embedding policy commitments	111	
	GRI 2-25: Processes to remediate negative impacts	116	
	GRI 2-26: Mechanisms for seeking advice and raising concerns	117	
	GRI 2-27: Compliance with laws and regulations	118	
	GRI 2-28: Membership associations	121	
	GRI 2-29: Approach to stakeholder engagement	122	
	GRI 2-30: Collective bargaining agreements	125	
<b>Material Topics</b>			
<b>GRI 3: Material Topics</b>			
	GRI 3-1: Process to determine material topics	127	
	GRI 3-2: List of material topics	128	

continued

GRI Standard	Disclosure	Page	Omissions and description
<b>GRI 3: Privacy and cybersecurity</b>			
	GRI 3-3: Privacy and cybersecurity	129	
<b>GRI 3: Digital inclusion</b>			
	GRI 3-3: Digital inclusion	134	
<b>GRI 3: Infrastructures and emerging technologies</b>			
	GRI 3-3: Infrastructures and emerging technologies	139	
<b>GRI 3: Customer interaction and service transparency</b>			
	GRI 3-3: Customer interaction and service transparency	143	
<b>GRI 3: Employee health and safety</b>			
	GRI 3-3: Employee health and safety	150	
<b>GRI 3: Development and motivation of TIM employees</b>			
	GRI 3-3: Development and motivation of TIM employees	154	
<b>GRI 3: Climate change</b>			
	GRI 3-3: Climate change	159	
<b>GRI 3: Energy transition</b>			
	GRI 3-3: Energy transition	164	
<b>GRI 3: Legal and regulatory context management</b>			
	GRI 3-3: Management of the legal and regulatory environment	167	
<b>GRI 3: Equal pay and opportunity</b>			
	GRI 3-3: Equal pay and opportunity	173	
<b>GRI 3: Community and stakeholder relations</b>			
	GRI 3-3: Community and stakeholder relations	178	

*continued*



GRI Standard	Disclosure	Page	Omissions and description
<b>GRI 3: Resilience to physical, public health, and sociopolitical risks</b>			
	GRI 3-3: Resilience to physical, public health, and sociopolitical risks	184	
<b>GRI 3: Sustainable supply chain</b>			
	GRI 3-3: Sustainable supply chain	188	
<b>GRI 3: Human rights defense</b>			
	GRI 3-3: Defense of human rights	192	
<b>GRI 3: Cyberbullying, child pornography, online gambling</b>			
	GRI 3-3: Cyberbullying, child pornography, online gambling	196	
<b>GRI 3: Circular economy and waste production</b>			
	GRI 3-3: Circular economy and waste production	201	
<b>ENVIRONMENT/EMPLOYEES</b>			
<b>Economic Performance</b>			
<b>GRI 201: Economic Performance</b>			
	GRI 201-1: Direct economic value generated and distributed	272	
	GRI 201-2: Financial implications and other risks and opportunities due to climate change	213	
	GRI 201-3: Defined benefit plan obligations and other retirement plans and opportunities	232	
<b>CIVIL SOCIETY</b>			
<b>Indirect Economic Impacts</b>			
<b>GRI 203: Indirect Economic Impacts</b>			
	GRI 203-2: Significant indirect economic impacts	272	
<b>SUPPLIERS</b>			
<b>Procurement Practices</b>			
<b>GRI 204: Procurement Practices</b>			
	GRI 204-1: Proportion of spending on local suppliers	258	

continued

GRI Standard	Disclosure	Page	Omissions and description
<b>CIVIL SOCIETY</b>			
<b>Anti-corruption</b>			
<b>GRI 205: Anti-corruption</b>			
	GRI 205-1: Operations assessed for risks related to corruption	274	
	GRI 205-2: Communication and training about anti-corruption policies and procedures	278	
	GRI 205-3: Confirmed incidents of corruption and actions taken	279	
<b>INDUSTRY BUSINESS COMMUNITY</b>			
<b>Anti-competitive Behavior</b>			
<b>GRI 206: Anti-competitive Behavior</b>			
	GRI 206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	289	
<b>CIVIL SOCIETY</b>			
<b>Tax</b>			
<b>GRI 207: Tax</b>			
	GRI 207-1: Approach to tax	280	
	GRI 207-2: Tax governance, control, and risk management	280	
	GRI 207-3: Stakeholder engagement and management of concerns related to tax	282	
	GRI 207-4: Country by country reporting	283	
<b>ENVIRONMENT</b>			
<b>Energy</b>			
<b>GRI 302: Energy</b>			
	GRI 302-1: Energy consumption within the organization	214	
	GRI 302-2: Energy consumption outside of the organization	217	At present, data are partially available as described within the text
	GRI 302-3: Energy intensity	217	

continued

GRI Standard	Disclosure	Page	Omissions and description
Emissions			
GRI 305: Emissions			
	GRI 305-1: Direct (Scope 1) GHG emissions	218	
	GRI 305-2: Energy indirect (Scope 2) GHG emissions	219	
	GRI 305-3: Other indirect (Scope 3) GHG emissions	221	Data related to Category 11 consider only BU Domestic performances'
	GRI 305-4: GHG emissions intensity	222	
	GRI 305-5: Reduction of GHG emissions	223	
Waste			
GRI 306: Waste			
	GRI 306-1: Waste generation and significant waste-related impacts	223	
	GRI 306-2: Management of significant waste-related impacts	223	
	GRI 306-3: Waste generated	224	
	GRI 306-4: Waste diverted from disposal	225	
	GRI 306-5: Waste directed to disposal	226	
Supplier Environmental Assessment			
GRI 308: Supplier Environmental Assessment			
	GRI 308-1: New suppliers that were screened using environmental criteria	258	
	GRI 308-2: Negative environmental impacts in the supply chain and actions taken	259	
EMPLOYEES			
Employment			
GRI 401: Employment			
	GRI 401-1: New employee hires and employee turnover	233	
	GRI 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees	234	
	GRI 401-3: Parental leave	235	

continued

GRI Standard	Disclosure	Page	Omissions and description
<b>Labor/Management Relations</b>			
<b>GRI 402: Labor/Management Relations</b>			
	GRI 402-1: Minimum notice periods regarding operational changes	236	
<b>Occupational Health and Safety</b>			
<b>GRI 403: Occupational Health and Safety</b>			
	GRI 403-1: Occupational health and safety management system	237	
	GRI 403-2: Hazard identification, risk assessment and incident investigation	238	
	GRI 403-3: Occupational health services	240	
	GRI 403-4: Worker participation, consultation and communication on occupational health and safety	241	
	GRI 403-5: Worker training on occupational health and safety	242	
	GRI 403-6: Promotion of worker health	243	
	GRI 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	244	
	GRI 403-8: Workers covered by an occupational health and safety management system	245	
	GRI 403-9: Work-related injuries	246	
	GRI 403-10: Work-related ill health	248	
	GRI 403-1/10 (workers who are not employees)		At present, data related to workers that are not employees are not available, due to complexity in data collection process. The TIM Group is committed in the coming years to initiate a process of data collection and reporting, starting with the most significant categories of non-employee workers (e.g., call centers and network enterprises).

continued

GRI Standard	Disclosure	Page	Omissions and description
<b>Training and Education</b>			
<b>GRI 404: Training and Education</b>			
	GRI 404-1: Average hours of training per year per employee	249	
	GRI 404-2: Programs for upgrading employee skills and transition assistance programs	249	
	GRI 404-3: Percentage of employees receiving regular performance and career development reviews	251	
<b>Diversity and Equal Opportunity</b>			
<b>GRI 405: Diversity and Equal Opportunity</b>			
	GRI 405-1: Diversity of governance bodies and employees	252	
	GRI 405-2: Ratio of basic salary and remuneration of women to men	254	
<b>HUMAN RIGHTS - DISCRIMINATION</b>			
<b>Non-discrimination</b>			
<b>GRI 406: Non-discrimination</b>			
	GRI 406-1: Incidents of discrimination and corrective actions taken	228	
<b>EMPLOYEES/SUPPLIERS</b>			
<b>Freedom of Association and Collective Bargaining</b>			
<b>GRI 407: Freedom of Association and Collective Bargaining</b>			
	GRI 407-1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	260	
<b>Child Labor</b>			
<b>GRI 408: Child Labor</b>			
	GRI 408-1: Operations and suppliers at significant risk for incidents of child labor	261	
<b>Forced or Compulsory Labor</b>			
<b>GRI 409: Forced or Compulsory Labor</b>			
	GRI 409-1: Operations and suppliers at significant risk for incidents of forced or compulsory labor	261	

continued

GRI Standard	Disclosure	Page	Omissions and description
<b>Local Communities</b>			
<b>GRI 413: Local Communities</b>			
	GRI 413-2: Operations with significant actual and potential negative impacts on local communities	283	
<b>SUPPLIERS</b>			
<b>Supplier Social Assessment</b>			
<b>GRI 414: Supplier Social Assessment</b>			
	GRI 414-1: New suppliers that were screened using social criteria	258	
	GRI 414-2: Negative social impacts in the supply chain and actions taken	259	
<b>CIVIL SOCIETY</b>			
<b>Public Policy</b>			
<b>GRI 415: Public Policy</b>			
	GRI 415-1: Political contributions	284	
<b>CUSTOMERS</b>			
<b>Customer Health and Safety</b>			
<b>GRI 416: Customer Health and Safety</b>			
	GRI 416-1: Assessment of the health and safety impacts of product and service categories	264	
	GRI 416-2: Incidents of non-compliance concerning the health and safety impacts of products and services	265	
<b>Marketing and Labeling</b>			
<b>GRI 417: Marketing and Labeling</b>			
	GRI 417-1: Requirements for product and service information and labeling	266	
	GRI 417-2: Incidents of non-compliance concerning product and service information and labeling	268	
	GRI 417-3: Incidents of non-compliance concerning marketing communications	269	
<b>Customer Privacy</b>			
<b>GRI 418: Customer Privacy</b>			
	GRI 418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	270	

# European Taxonomy

(Pursuant to Regulation 2020/852 of June 20, 2020 and Delegated Regulation 2021/2178 of July 6, 2021)

## The European Taxonomy

### TIM Group's position

### How the TIM Group has implemented the European Taxonomy

#### The perimeter of eligibility

Climate change mitigation goal

Activity 8.1 Data processing, hosting and related activities

Activity 8.2 Data-driven solutions for GHG emissions reductions of greenhouse gases

Climate change adaptation goal

Activity 8.3 Programming and broadcasting activities

Activities outside the scope of eligibility

#### The alignment perimeter

Substantial contribution to change mitigation goal climate

Analysis of substantial contribution for activity 8.1

Analysis of substantial contribution for activity 8.2

Substantial contribution to the goal of change adaptation climate

Analysis of substantial contribution for activity 8.3

Verification of Do No Significant Harm (DNSH) Principles

Adaptation to climate change

Sustainable use and protection of water and marine resources

Transition to a circular economy

Minimum safeguards

## Calculation and reporting of economic KPIs

Turnover

CapEx

CapEx type C

OpEx

## Regulatory and contextual developments

## The European Taxonomy

The European Taxonomy (EU 2020/852) is a classification system introduced as part of the European *Green Deal* as an enabling tool to achieve the environmental and climate goals set out in the Pact, particularly decarbonization by 2050. Through precise indications about economic activities that can be classified as eco-sustainable (provided through specific Delegated Acts), the Regulation aims to address the issue of transparency for investors, counter the phenomenon of so-called “*greenwashing*,” while supporting corporate organizations in the process of energy transition and adoption of sustainable environmental policies. The European Taxonomy defines six environmental goals, of which the first two have been regulated to date: climate change mitigation and climate change adaptation. From a regulatory perspective, the Regulation introduces a new disclosure requirement aimed at large public interest entities that already prepare a Non-Financial Statement (NFS) in compliance with the application of Legislative Decree 254/2016.

## TIM Group's position

The TIM Group has welcomed the introduction of the European Taxonomy, viewing the new regulatory framework as premises of a tool that can offer the

investing world and all stakeholders a common and comparable benchmark. In addition to having immediately initiated all the necessary actions to adapt its reporting systems to the requirements of the new Regulations, the TIM Group actively participates in consultation processes, providing input through the industry associations in which the Group participates<sup>(1)</sup>.

## How the TIM Group has transposed the European Taxonomy

Based on the guidance contained in the Delegated Act on Climate Change Goals (published in its definite version in June 2021), a two-stage process was developed through which the applicability of the Taxonomy was first assessed through the analysis of the Group's entire business model and, subsequently, the reporting operations of potentially eligible activities were initiated. In view of the steps in the Regulation's implementation roadmap, the focus of the process in 2021 had been exclusively on climate change mitigation and adaptation objectives, considered under the eligibility criterion alone. At the close of the fiscal year, the TIM Group has in parallel begun the study of the process integrations necessary to meet the disclosure requirements envisaged as of fiscal year 2022, which require the application and verification of technical screening criteria for each of the eligible assets surveyed (alignment to Taxonomy).

(1) Among the most significant industry references *The European Telecommunications Network Operators' Association - ETNO*.



The alignment verification process was carried out by the TIM Group consistent with the provisions of the Taxonomy regulations, taking into consideration compliance with the following key requirements for each activity:

- contribute substantially to the achievement of one or more of the proposed environmental objectives;
- Do No Significant Harm (DNSH) to any of the environmental objectives;
- be in compliance with minimum safeguards, respecting social and governance safeguards.

Subsequently, the three economic indicators required by the Regulation, representing the shares of revenues (Turnover), investments (CapEx) and operating expenses (OpEx) associated with economic activities considered eco-sustainable were calculated.

It should be noted that the enactment and application of the technical screening criteria may result in possible changes on the perimeter of activities potentially aligned to the Taxonomy with a consequent downsizing of the associated performance indicators. For more details on how to report, see the section “Methodology for Calculating KPIs.”

Finally, taking into account the recent application of the Regulation and the technical complexity posed by the requirements, the TIM Group's approach in identifying eligible and aligned activities has been guided by strict adherence to the guidelines of the Regulation, resulting in the exclusion of projects not included within the Delegated Acts of the Regulation.

## The perimeter of eligibility

An economic activity is eligible under the European Taxonomy if there is a corresponding description within the Delegated Acts, regardless of whether or not that activity meets the technical screening criteria reported within the latter. In order to determine which activities of the TIM Group can be traced back to those identified by the Taxonomy, the main business activities were mapped and analyzed, with a focus on commercial offerings and investment projects.

As indicated by the Regulation, in carrying out this exercise, the TIM Group has taken into consideration the climate objectives it intends to pursue from the identified economic activities. In particular, this criterion has significant value for activities such as 8.1 (Data processing, hosting and related activities) which, having the same objective of the two regulated acts, can contribute to both targets.

Among the activities identified by the TIM Group, there are both economic activities eligible for the mitigation goal and the climate change adaptation goal, as shown in the table below:

Economic activities	Description	Objective
8.1 Data processing, hosting and related activities	Storage, manipulation, management, movement, control, display, switching, interchange, transmission or reception of a diversity of data across data centers, including edge computing.	Mitigation
8.2 Data-driven solutions for GHG emissions reductions	Development or use of ICT solutions that are aimed at collecting, transmitting, storing data and at its modelling and use where those activities are predominantly aimed at the provision of data and analytics enabling GHG emission reductions. Such ICT solutions may include, <i>inter alia</i> , the use of decentralized technologies (i.e. distributed ledger technologies), Internet of Things (IoT), 5G and Artificial Intelligence.	Mitigation
8.3 Programming and broadcasting activities	Programming and broadcasting activities include creating content or acquiring the right to distribute content and subsequently broadcasting that content, such as radio, television and data programs of entertainment, news, talk, and the like, including data broadcasting, typically integrated with radio or TV broadcasting. The broadcasting can be performed using different technologies, over-the-air, via satellite, via a cable network or via Internet. This also includes the production of programs that are typically narrowcast in nature (limited format, such as news, sports, education, and youth-oriented programming) on a subscription or fee basis, to a third party, for subsequent broadcasting to the public.	Adaptation

Economic activities not shown in the table above:

4.1 (Electricity generation by solar photovoltaic technology)

(mitigation/adaptation), that is, those activities involving the construction or operation of facilities in order to produce electricity using solar photovoltaic technology;

7.2 (Renovation of Existing Buildings) (mitigation and adaptation), which is the renovation of building and civil engineering works.

As can be seen from the descriptions provided in the Taxonomy, both economic activities cannot be considered core to the TIM Group's business. As a result, with the aim of taking the most precautionary approach, the TIM Group has considered proceeding with the detailed and in-depth analysis of *core-business* activities only. For more details, see the section “Type C CapEx” in this chapter.

## Climate change mitigation goal

### Activity 8.1 Data processing, hosting and related activities

Since Activity 8.1(Data processing, hosting, and related activities) has the same description for both climate objectives, unlike for FY 2021, the TIM Group decided to carry out the analyses related only to the climate change mitigation objective, believing the nature of its activities to be more related to this objective and in order to avoid the risk of *double-counting*.

Included within this category are activities performed by data centers owned by the TIM Group, mainly related to housing and hosting services of IT facilities for storage and processing. This activity can be carried out through the following ways:

- The use of devices and infrastructure owned by the TIM Group;

- The involvement of a third party entity for service delivery (through subcontracting contracts);
- Cloud provider involvement that involves supporting devices and infrastructure not owned by the TIM Group that enable the use of cloud technology.

Despite the different service delivery configurations, the activity is fully eligible under the Taxonomy.

However, a part of the TIM Group's Data Center is used only to carry out internal activities functional to the organization. This portion does not comply with the Regulation, thus being excluded from the eligibility scope of the Taxonomy.

#### **Activity 8.2 Data-driven solutions for reducing greenhouse gas emissions**

Included within this category were IT solutions and services offered by TIM with the potential to reduce the impact of CO<sub>2</sub> emissions to the atmosphere. In particular, given the number and variety of existing offerings, the TIM Group has adopted an analytical and granular approach, which has enabled it to analyze each individual service capable of providing significant benefit to its customers. Offerings include mainly *smart services* in domains such as mobility, home automation, public administration, and agriculture, based on IoT solutions that enable intelligent data management for automated and monitoring activities that contribute to the well-being of Society and the environment.

Also included were services that support the digitization and automation of an organization's operational activities, which are critical to reducing GHG emissions,

by managing information systems and data processing activities through IoT and Cloud solutions. These offerings are closely related to the implementation of software and communication technologies for efficient data management.

Primarily, these are *Private, Hybrid and Multi Cloud IaaS (Infrastructure as a Service)* Cloud computing solutions, delivered on TIM, Google and other hyperscaler computational platforms, which are associated with the delivery of professional and managed services in support of businesses. Other offerings such as “Trusted services,” on the other hand, consist of solutions for issuing digital certificates, invoicing, certified e-mail services, again delivered in the Cloud.

Ultimately, the integration and management of information flows through IoT solutions enables the digital transformation of services addressed to different sectors such as urban, industrial and healthcare.

According to what has been shared and approved in the technical working tables of the TELCO sector (such as ETNO), all activities suitable for the development of infrastructures for the delivery of ICT services (services on fixed network, mobile, 4G / 5G) will not be included in the perimeter of eligibility, although they represent a preponderant part of the business activities carried out by the TIM Group capable of delivering benefits in the process of digitization of telecommunications networks and, ultimately, mitigating the effects of climate change.

## Climate change adaptation goal

### Activity 8.3 Programming and transmission activities

Included within this category are services and offerings related to content production and broadcasting activities carried out by the TIM Group through the TIMVision marketing solution. With this activity, the TIM Group is able to provide program schedules composed of its own and/or purchased third-party content, playing a potential role in disseminating and raising awareness with respect to the issues of climate change and its consequences.

Specifically, the TIM Group offers various packages that include for the viewer movies, TV series, cartoons, general entertainment, which, depending on the offer selected, may belong in different proportions both to TIM's own catalog and to the catalog of third-party operators.

### Activities outside the scope of eligibility

According to the mapping and analysis of the activities carried out by the TIM Group, a portion is ineligible under the Taxonomy because it is not included within the Climate Act.

Specifically, the following activities are excluded:

- ICT service delivery infrastructure development services, which, as anticipated, are excluded from the scope of eligibility despite the fact that they are a key factor in the digital transition and the consequent reduction of GHG emissions impact;

- the provision of consulting services and development of cybersecurity solutions, despite being part of the set of solutions being developed by the TIM Group through 5G, Cloud, IoT (Internet of Things), big data technologies, which are considered eligible under the Taxonomy;
- the sale of telephone products.

However, it is important to note that the current scope of eligibility may change over time, in accordance with regulatory developments and the publications of Delegated Acts on the remaining four environmental objectives of the Taxonomy, which are currently still being finalized. The telecommunications sector, in fact, still sees itself partially represented by the current Regulations, and it is not ruled out that there may be additions that can further enhance the key role this sector can play within a path to the achievement of the six environmental goals. See the section “Regulatory and Contextual Developments” in this chapter for further considerations.

## The alignment perimeter

An economic activity is defined as aligned with the European Taxonomy when it contributes substantially to one of the six environmental objectives, does no significant harm to the other five objectives, and meets minimum safeguards.

The TIM Group carried out the necessary investigations and analyses to verify compliance with the technical screening criteria established by the Regulation for each of the eligible economic activities identified for the first two environmental objectives.

## Substantial contribution to the mitigation goal of climate change

### Analysis of substantial contribution for activity 8.1

As much as the organization intends to align its 8.1 activities with the climate change mitigation goal, for this first year of reporting it was unable to demonstrate compliance with this substantial contribution.

Within the perimeter of alignment analysis, it was decided to consider all Data Centers suitable for the performance of housing and hosting services, where the TIM Group has direct control over the provision of the service without the intermediation of third parties, and/or to services provided through subcontracting contracts, where the TIM Group acts as an “agent” commissioning the activity and not as a “principal.”

Part of the Data Centers considered comply with the first requirement of substantial contribution, in line with the best management practices defined by the European Data Center Code of Conduct on Energy Efficiency. This code consists of a reference document for Data Center operators that identifies and collects a set of possible implementation measures to improve the energy efficiency of facilities. Precisely in order to ensure the standards subscribed to in the code of conduct, the TIM Group is required to submit an annual report detailing its progress in streamlining its technology infrastructure. Although this report is evaluated by a committee to determine the enrollment of Data Centers in the code of conduct, the implementation of the practices is currently not independently verified by an independent third party, as required by the substantial climate change mitigation contribution.

In addition, the TIM Group uses to date in its Data Centers different types of refrigerant gas having a global warming potential (abbreviated *GWP*, from *Global Warming Potential*) on average higher than the threshold established in the Taxonomy Delegated Regulation, defined for the purpose of limiting the use of potentially more impactful technologies in the event of any leakage into the atmosphere.

That said, a gradual process of replacing refrigerant gases having a very high *GWP* has been underway for several years in order to make Data Center cooling systems more efficient. What the Regulation requires further incentivizes the rapid implementation of this replacement process.

### Analysis of substantial contribution for activity 8.2

According to the requirements of the substantial contribution criterion, the technology under analysis must have the goal of substantially reducing GHG emissions and must represent the best alternative available on the market. In addition, the reduction in GHG emissions must be certified by an independent third party. Although at present it has not been possible to quantify and certify the reduction in emissions compared to the best market alternatives and thus demonstrate compliance with the substantial contribution, the TIM Group is considering developing the “Carbon-calculator” project internally.

## Substantial contribution to the adaptation goal of climate change

### Analysis of substantial contribution for activity 8.3

The requirements of the Substantial Contribution to Climate Change Adaptation request that a robust climate risk and vulnerability assessment has been carried out, taking into consideration the physical climate risks outlined in Appendix A of Delegated Regulation 2021/2139<sup>(2)</sup>. As a result, the expectation is that economic activity has implemented adaptation solutions that can substantially reduce the identified physical climate risks.

The TIM Group has integrated a plan for risk management (Enterprise Risk Management) and, with the aim of achieving its goals with respect to climate change, starting in 2021 it began to structure a climate risk assessment following the recommendations of the TCFD<sup>(3)</sup> Framework with a particular focus on reducing CO<sub>2</sub> emissions.

Physical risks identified based on those listed in Appendix A of Delegated Regulation 2021/2139 were considered in the assessment. Two scenarios<sup>(4)</sup> from those proposed by NGFS (*Network for Greening the Financial System*) were evaluated to set up the impact analysis of these risks (mainly hydrogeological risks). To limit potential damage, the TIM Group has adopted prevention and protection systems for its assets, as well as subscribing to an insurance program.

For the purposes of meeting the requirement of the Taxonomy, the analyses carried out for the development of the TIM Group's *climate risk assessment* reflect the characteristics required by Annex II of the Delegated Act, so the substantial contribution can be considered fulfilled.

In addition, the TIM Group is working steadily with the aim of integrating the methodology used to assess climate risks and related adaptation solutions, confirming the ambition of its climate strategy and targets set to actively contribute to the fight against climate change.

(2) Delegated Regulation 2021/2139 is a document supplementing Regulation (EU) 2020/852 that sets the technical screening criteria for determining the alignment of an activity.

(3) Task Force on Climate-Related Financial Disclosures.

(4) Orderly (Net Zero); Disorderly (Divergent Net Zero); Hot House World (Current Policies).

There is a fifth verification point for Activity 8.3 (Programming and Transmission Activities), which can be considered an enabler under Art. 11(1)(b) of Regulation (EU) 2020/852, if it meets a specific criterion for substantial contribution that, through a climate risk assessment, the technology, service or product served is assumed to promote:

- increasing the resilience to physical climate risks of other people, nature, cultural heritage, assets and other economic activities;
- the contribution to the adaptation efforts of other people, nature, cultural heritage, property and other economic activities.

To verify this requirement, the TIM Group looked at the TIM Group's proprietary program schedule catalog, which contains the list of programs directly selected by the TIM Group, with the aim of identifying the amount of broadcasts meeting the climate change awareness requirement. With regard to content owned by third-party operators, which is the subject of re-broadcasting activities, the analyses aimed at verifying the requirement have not been conducted because the TIM Group does not exercise any choice over the type of content to be broadcast nor does it possess any visibility rights over the titles aired.

According to the findings of the analysis, it was possible to identify a share of programs dealing with issues related to climate change, particularly within educational broadcasts, aimed at a juvenile audience, and the documentary genre. For the purposes of the Taxonomy, it is therefore possible to consider the portion of revenues and investments related to these programs as aligned.

However, the portion of Turnover and CapEx associated with them, and reportable for the purposes of the alignment exercise, has little material impact compared to the totality of economic values generated by the Group's business. Therefore, the TIM Group for this year considered it more appropriate and precautionary not to value this alignment percentage. For more details on the calculation methodology adopted, see the section “Calculation and reporting of economic KPIs.”

## Verification of Do No Significant Harm (DNSH) Principles

Despite the fact that for this first year of reporting only one activity is found to positively meet the substantial contribution requirements related to the first two environmental objectives, the TIM Group has nevertheless carried out the necessary analyses in relation to compliance with the “Do No Significant Harm” principles which require that the activities under analysis do not cause significant harm to the remaining environmental objectives (*Climate Change Mitigation, Climate Change Adaptation, Sustainable Use of Water and Protection of Marine Resources, Transition to a Circular Economy, Pollution Prevention and Reduction, and Protection and Restoration of Biodiversity and Ecosystems*). For TIM Group activities, the DNSH criteria verifications provided are as follows:

## Do No Significant Harm (DNSH)

Economic activities	Climate change mitigation	Adaptation to climate change	Sustainable water use and protection of marine resources	Transition to a circular economy	Prevention and reduction of pollution	Protection and restoration of biodiversity and ecosystems
<b>Climate change mitigation goal</b>						
8.1 Data processing, hosting and related activities	N/A	Applicable	Applicable	Applicable	N/A	N/A
8.2 Data-driven solutions for GHG emissions reductions	N/A	Applicable	N/A	Applicable	N/A	N/A
<b>Climate change adaptation goal</b>						
8.3 Programming and broadcasting activities	N/A	N/A	N/A	N/A	N/A	N/A

To check the compliance of activities with the requirements, audits were conducted at the Group level and then proceeded with in-depth investigations at the business unit or individual activity level.

The following paragraphs detail the analyses carried out according to the above scheme.

### Adaptation to climate change

The DNSH criterion regarding climate change adaptation applies to activities with climate change mitigation as their primary objective. Specifically, for both mitigation activities 8.1 (Data processing, hosting, and related activities) and 8.2

(Data-driven solutions for GHG emission reduction), the requirement includes compliance with Appendix A of the Delegated Regulation, in which a robust climate risk and vulnerability assessment and an assessment of adaptation solutions is required. The criteria of this DNSH, which almost completely mirror the requirements of the substantive contribution of this goal, can be considered outdated. For more details, please refer to the section “Substantial contribution to the climate change adaptation goal” in this chapter.

### Sustainable use and protection of water and marine resources

The requirements of this DNSH apply to activity 8.1 (Data processing, hosting,



and related activities), and are set out in Appendix B of the Delegated Climate Regulation, which requires that a water use and protection management plan has been implemented and, where applicable, that an environmental impact assessment (EIA) has been carried out in accordance with Directive 2011/92/EU. The TIM Group has an ISO 14001-certified environmental management system for its data centers. As for EIA, this is a procedure regulated by Article 19 of Legislative Decree 152/2006, which, in listing the various types of projects for which environmental impact assessment is required, does not mention the activity of Data Centers. However, thermal power plants for electricity, steam and hot water production with a total thermal power output exceeding 150 MW are present. Since this threshold is not exceeded in the TIM Group Data Centers, the DNSH related to sustainable use and protection of water and marine resources is considered satisfied.

### **Transition to a circular economy**

For mitigation activities 8.1 (Data processing, hosting and related activities) and 8.2 (Data-driven solutions for GHG emissions reductions), DNSH related to the transition to a circular economy has several requirements.

Eco-friendly design and energy-saving aspects required by Directive 2009/125/EC are verified by the TIM Group when purchasing electronic equipment for which compliance with specific energy efficiency standards is required, such as: the application of Power Management technology and the compliance of systems with international energy efficiency standards 80Plus Titanium and ETSI EN 300 019 -2-3 V2.4.1 Specification T3.1E.

As far as waste management is concerned, The TIM Group has in place a procedure that regulates its proper management and, in addition, has entered into targeted contracts with companies specializing in the management of used, broken down and end-of-life products, with the aim of enabling the recovery of components and raw materials, while obtaining tangible economic benefits from their valorization.

This DNSH criterion also requires that no substances, either in their pure state or within mixtures or articles, listed in Annex II of Directive 2011/65/EU be used. Substances in this annex include lead, cadmium and mercury, which are present in the batteries installed at all Fixed Network locations in Italy. In addition, mercury is found within the power systems of certain equipment.

In addition, in the purchasing processes of devices used by the TIM Group, while submitting specific sustainability requirements to potential suppliers, no specifications are reported regarding the substances within the electronic equipment.

According to DNSH's latest requirement, at the end of its life cycle, equipment must be subjected to preparation for reuse, recovery or recycling, or appropriate treatment in accordance with Annex VII of Directive 2012/19/EU. This directive was implemented in Italy by Legislative Decree 49/2014. Compliance with this requirement is met through the TIM Group's declaration of the management of the disposal of electrical and electronic equipment in accordance with the R.A.E.E. Regulations, which in turn are regulated by Legislative Decree 49/2014.

Despite the numerous management and oversight activities carried out by the TIM Group with respect to the issues covered by the DNSH requirements, it is concluded that some criteria are still only partially met.

Finally, for this first year of reporting, it was not possible to verify compliance with the requirements of this DNSH for activity 8.2 (Data-driven solutions for GHG emissions reductions) because it is an activity that includes many different IT services and solutions.

## Minimum safeguards

In line with the requirements of Article 3(c) of Regulation 2020/852, the TIM Group conducts its business activities in compliance with the minimum safeguards specified in Article 18 of the Regulation, i.e., in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the principles and rights set forth in the eight core conventions identified in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

### Human rights, including those of workers

The TIM Group affirms its commitment to respect for human rights within its Code of Ethics and Conduct and monitors relevant aspects of it through a dedicated policy that has application at the Group level and across the entire value chain, to protect all workers, collaborators outside the TIM Group and customers in general. The policy has been drafted on the basis of recognized international references (such as UN Universal Declaration of Human Rights, International Labor Organization, OECD, Guidelines for Multinational Enterprises,

etc.) and is supported in its application by additional internal references (by way of example: the 231 Organizational Model, Social Responsibility, Supplier Relations in the Purchasing process, etc.). All the activities recommended by the policy are subject to a periodic internal due diligence process (carried out by sending out a self-assessment questionnaire), with the aim of identifying and mapping the Human Rights risks arising from the Group's operational activities, monitoring the effectiveness of the safeguards in place for each of the relevant issues and, in particular, defining a path of increasing stakeholder engagement with respect to these issues.

To ensure compliance with the policy and monitoring of related issues across the entire value chain, the TIM Group subjects its suppliers to an evaluation questionnaire and conducts periodic audits. For the latter, specifically, The TIM Group refers to the expectations on the requirements being audited agreed upon and formalized by key TELCO stakeholders in the Joint Audit Cooperation (JAC), an industry initiative, of which the TIM Group is one of the founders, that aims to raise standards on Human Rights.

Finally, the TIM Group recently joined Open-Es, a platform for sharing data and information on companies' sustainability performance. As of January 1, 2021, all active suppliers of the TIM Group have been asked to join the platform with the aim of establishing a transparent and cooperative relationship for a common path of improvement.

### Taxation

The TIM Group's tax governance is guided by the principles contained in its Code of Ethics and Conduct, and the approach for its management is defined in the Group's Tax Strategy and Tax Policy. According to these documents, the TIM Group is committed to establishing fully transparent relations with the Tax Authorities. It is also stipulated that tax-related risks are identified and managed through an internal control system (Tax Control Framework).

### Corruption

In order to prevent possible corruption incidents, the Parent Company TIM S.p.A. and TIM Brasil have implemented an ISO 37001 certified management system. In particular, the Group has various procedures such as the Code of Ethics, Organizational Model 231 and the Anti-Corruption Policy to confirm its commitment.

### Fair competition

Fair competition is promoted by the TIM Group, which is actively engaged and participates in running technical tables and initiatives in collaboration with competitors. The TIM Group's sensitivity to the issue is also supported by the Code of Ethics and Conduct, in which it refers to the principles of transparency, fairness and loyalty, which are observed whenever a service is provided or an activity is conducted. Indeed, fair competition is recognized as serving the interest of each market player, customers and more generally all stakeholders. In addition, the TIM Group regularly provides adequate and appropriate training/information to corporate bodies and its employees.

### Disputes

The TIM Group has not received any final convictions for violations of fundamental and constitutionally guaranteed rights in the area of labor, such as freedom of association, discrimination due to union membership or human rights violations, or for corruption.

In addition, the TIM Group has not received any definitive legal charges for tax violations.

Finally, with regard to FY 2022, it is reported that there are 2 ongoing proceedings regarding the agreements with DAZN and A556, related to the CONSIP tender for mobile phone services. In any case, the TIM Group is highly sensitive to these issues, as evidenced by the initiatives and activities undertaken with market competitors, as well as ongoing discussions with industry associations and authorities (e.g., Communications Guarantee Authority-AGCOM-, Ministry of Economic Development). In fact, over the years, the TIM Group has developed a comprehensive compliance program through various initiatives such as the provision of antitrust training or antitrust compliance audit on Mergers & Acquisitions transactions, with the aim of analyzing and mapping risk, involving and making its employees more aware, and preparing and implementing internal procedures.

## Calculation and reporting of economic KPIs

For each of the activities considered eligible and aligned, non-financial enterprises are required to report three economic performance indicators (hereinafter also referred to as “KPIs,” from the English *Key Performance Indicator*) namely, the Turnover KPI, the Capital Expenditure KPI (CapEx) and the Operating Expenditure KPI (OpEx).

Within Annex II of the Article 8 Delegated Regulations, templates through which to report these data are made available.

As this is the first year of reporting on the alignment, comparative data with the previous period are not available and therefore will not be represented.

The percentage of the Group's economic activities eligible and aligned with the Taxonomy with respect to Turnover, CapEx, and OpEx was calculated in accordance with legal requirements and according to the accounting criteria specified within Annex I of the Delegated Regulation on Article 8. However, due to the variety of services offered belonging to the different economic activities surveyed by the TIM Group, in order to carry out a correct assessment of economic activities and calculation of KPIs, the Group needed to develop and use special estimates to identify the correct percentage of eligible and aligned economic activities, but also to exclude costs (CapEx/OpEx) or revenues that cannot be attributed entirely and exclusively to the single economic activity surveyed.

Being the second year of eligibility reporting, the TIM Group has been able to

refine the methodology of data collection and calculation, returning increasingly timely eligibility percentage values with respect to the activities conducted in FY 2022 by the Group.

The scope of 2022 reporting includes Group companies where the analysis has identified business activities that are compatible with the categories envisaged by the eligibility criteria of the regulations, while maintaining a precautionary and prudential approach regarding the reporting of such data. The values shown result from the aggregation of items related to TIM S.p.A., TI Sparkle Group, Noovle S.p.A. and Olivetti Group. With regard to TIM S.A., the Group's Brazilian subsidiary, the analysis conducted in 2022, although more punctual than last year, is not yet sufficiently thorough to be able to determine with certainty that the items included are consistent with those established by the Regulation.

### Turnover

The share of turnover aligned with Taxonomy Regulation results from the ratio of net revenues from aligned activities (numerator) to total net revenues (denominator). The denominator of KPI turnover refers to the item “revenue” in the Consolidated Statement of Comprehensive Income to 2022, consolidated in accordance with IAS 1.82(a). In particular, the value can be reconciled with the TIM Group's annual financial report with reference to Note 26 of the Consolidated Financial Statements.

The numerator of KPI Turnover is the net revenues associated with the Group's

products related to eligible and/or aligned activities. The allocation of net revenues to the numerator was made possible by the Group's accounting system, which allowed for the identification of eligible services and projects.

Regarding the alignment of revenues generated by Activity 8.3 (Programming and broadcasting activities), as anticipated, the TIM Group took into account only the portion attributable to content meeting the requirement to raise awareness of climate change issues. For this purpose, the aligned percentage was then derived by running a ratio between the programs meeting the criterion and the entire program schedule for FY 2022.

## CapEx

The proportion of taxonomy-aligned capital expenditure (CapEx) corresponds to the proportion of CapEx related to eligible and aligned activities (numerator) to total CapEx (denominator). The denominator should include additions to tangible and intangible assets during the year considered before depreciation, depletion, and any revaluation, including those resulting from restatements and reductions in value, for the year in question, and excluding changes in fair value. The denominator should also include increases to tangible and intangible assets resulting from business combinations. This value can be reconciled with the TIM Group's annual financial report, with reference to Notes 6, 7 and 8 of the Consolidated Financial Statements.

The eligible and aligned CapEx percentage includes:

- capital expenditures included in the denominator related to assets or processes associated with eligible/taxonomy-aligned economic activities (category a ex par. 1.1.2.2. Annex I Delegated Act Article 8);
- capital expenditures included in the denominator related to purchase from economic activities aligned with the Taxonomy and individual measures that enable the Group's activities to achieve low carbon emissions or greenhouse gas reductions (category c ex par. 1.1.2.2. Annex I Delegated Act Article 8).

Regarding the alignment of investments allocated on Activity 8.3 (Programming and broadcasting activities), the TIM Group considered only the portion corresponding to the percentage of aligned turnover, identified as described in the previous paragraph.

## Type C CapEx

Like last year, the TIM Group counts among the projects pertaining to the Taxonomy investments that can be classified in Type C CapEx, respectively, in activities 7.2 (Renovation of Existing Buildings) and 4.1 (Generation of Electricity by Solar Photovoltaic Technology) of the Climate Act.

Although these activities are compatible in terms of eligibility, the TIM Group has decided to deepen alignment analysis on core business activities, partly because of the materiality of the former and the inherent variability in terms of capitalization in previous and future reporting years. Finally, this decision is further

endorsed by the adoption of a precautionary approach that does not include the aforementioned activities performed on TIM's behalf by third-party suppliers.

### OpEx

The share of taxonomy-aligned operating expenses (OpEx) results from the proportion of eligible OpEx aligned by the direct non-capitalized costs for research and development, building renovation, short-term rent, maintenance and repair, and any other direct expenses related to the day-to-day maintenance of property, plant, and equipment (numerator) to the total OpEx related to the above categories (denominator). This value was calculated from the total value of operating expenses within the TIM Group's annual financial report with reference to Notes 28 and 44 of the Consolidated Financial Statements.

The percentage of eligible and aligned OpEx includes operating expenses related to assets and processes associated with economic activities aligned with the Taxonomy. Operating expenses were defined as eligible/aligned in case they were directly related to economic activities eligible/aligned to the Taxonomy in order to avoid *double-counting*.

## TURNOVER

Economic activities	Codes	Substantial contribution criteria								DNSH Criteria							Share of turnover aligned to Taxonomy, 2022	Share of turnover aligned to Taxonomy, 2021	Category (activity enabling o)	Category (activity transitional)
		Absolute turnover	Share of turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular Economy	Pollution	Biodiversity and ecosystems	Mitigation of climate change	Adaptation to the climate change	Water and marine resources	Circular Economy	Pollution	Biodiversity and ecosystems	Minimum safeguards				
		k€	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	A	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (ALIGNED WITH TAXONOMY)																				
8.3 Programming and broadcasting activities		44	0.0003%	N/A	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	S	0.0003%	N/A	A	
Turnover of environmentally sustainable activities (aligned with taxonomy) (A.1)		44	0.0003%	0%	100%	N/A	N/A	N/A	N/A								0.0003%	N/A		
A.2 ACTIVITIES ELIGIBLE FOR THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT ALIGNED WITH THE TAXONOMY)																				
8.1 Data processing, hosting and related activities		509,437	3.2%	100%	0%	N/A	N/A	N/A	N/A	N/A	S	S	N	N/A	N/A	S				
8.2 Data-driven solutions for GHG emissions reductions		185,242	1.2%	100%	0%	N/A	N/A	N/A	N/A	N/A	S	N/A	N	N/A	N/A	S				
8.3 Programming and broadcasting activities		2,813	0.018%	0%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	S				
Turnover of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)		697,494	4.4%																	
Turnover of activities eligible for the taxonomy (A.1 + A.2) (A) (A.1 + A.2) (A)		697,538	4.4%	99.6%	0.40%	N/A	N/A	N/A	N/A								0.0003%	N/A	0.0003%	
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
Turnover of activities not eligible for taxonomy (B)		15,090,461	95.6%																	
Total (A + B)		15,788,000	100%																	

## CAPEX

CAPEX			Substantial contribution criteria							DNSH Criteria										
Economic activities	Codes	Absolute Capex	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular Economy	Pollution	Biodiversity and ecosystems	Mitigation of climate change	Adaptation to climate change	Water and marine resources	Circular Economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Share of turnover aligned to Taxonomy, 2022	Share of turnover aligned to Taxonomy, 2021	Category (activity enabling o)	Category (activity of transition)
		k€	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	A	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (ALIGNED WITH TAXONOMY)																				
8.3 Programming and broadcasting activities		635	0.013%	N/A	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		0.013%	N/A	A	
Capital expenditures of environmentally sustainable activities (aligned with taxonomy) (A.1)		635	0.013%	0%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.013%	N/A	0.013%	
A.2 ACTIVITIES ELIGIBLE FOR THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT ALIGNED WITH THE TAXONOMY)																				
8.1 Data processing, hosting and related activities		228,207	4.6%	100%	0%	N/A	N/A	N/A	N/A	N/A	S	S	N	N/A	N/A	S				
8.2 Data-driven solutions for GHG emissions reductions		135,552	2.8%	100%	0%	N/A	N/A	N/A	N/A	N/A	S	N/A	N	N/A	N/A	S				
8.3 Programming and broadcasting activities		41,090	0.8%	0%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	S				
7.2 Renovation of existing buildings		59,654	1.2%	100%	0%	N/A	N/A	N/A	N/A											
4.1 Power generation by solar photovoltaic technology		5,673	0.1%	100%	0%	N/A	N/A	N/A	N/A											
Capital expenditures of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)		470,179	9.6%																	
Total capital expenditure eligible for Taxonomy (A.1 + A.2) (A)		470,814	9.6%	77.3%	8.7%	N/A	N/A	N/A	N/A								0.013%	N/A	0.013%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
Capital expenditures of activities not eligible for taxonomy (B)		4,438,185	90.4%																	
Total (A + B)		4,909,000	100%																	



## OPEX

OPEX				Substantial contribution criteria						DNSH Criteria										
Economic activities	Codes	Absolute OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular Economy	Pollution	Biodiversity and ecosystems	Mitigation of climate change	Adaptation to the climate change	Water and marine resources	Circular Economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Share of turnover aligned to Taxonomy, 2022	Share of turnover aligned to Taxonomy, 2021	Category (activity enabling o)	Category (activity of transition)
		k€	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	A	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (ALIGNED WITH TAXONOMY)																				
8.3 Programming and broadcasting activities			0.00%	0%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		0.00%	N/A	A	
Operating expenses of environmentally sustainable activities (aligned with taxonomy) (A.1)	-	0.00%	0%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.00%	N/A	A	
A.2 ACTIVITIES ELIGIBLE FOR THE TAXONOMY BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT ALIGNED WITH THE TAXONOMY)																				
8.1 Data processing, hosting and related activities	150,243	11.0%	100%	0%	N/A	N/A	N/A	N/A	N/A	N/A	S	S	N	N/A	N/A	S				
8.2 Data-driven solutions for GHG emissions reductions	0.3	0.0%	100%	0%	N/A	N/A	N/A	N/A	N/A	N/A	S	N/A	N	N/A	N/A	S				
8.3 Programming and broadcasting activities	-	0.0%	0%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	S				
Operating expenses of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)	150,243	11.0%																		
Total operating expenses eligible for Taxonomy (A.1 + A.2) (A)	150,243	11.0%	100.0%	0.0%	N/A	N/A	N/A	N/A									N/A	N/A	A	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
Operating expenses of activities not eligible for taxonomy (B)	1,214,756	89.0%																		
Total (A + B)	1,365,000	100%																		

## Regulatory and contextual developments

In view of the fact that the Europe Taxonomy is an evolving Regulation (consider the future publication of Delegated Acts on the remaining environmental objectives), the TIM Group has adopted an approach as transparent and prudent as possible, interpreting and applying what is required by the Regulation as rigorously as possible.

Along with the constant analysis of the publications released by the Platform on Sustainable Finance, the TIM Group has been openly discussing with its peers in the TELCO sector in order to share and gather different points of view in interpreting, in the best possible way, the complexity of technical requirements.

Similar to other challenges that the TIM Group has taken up and is facing, the European Taxonomy presents itself as an opportunity that can motivate and lead toward an increasing refinement of the business model and performance of activities in relation to and with respect to the surrounding environment, becoming a fundamental tool for achieving radical and unprecedented change.

In particular, the digital solutions provided by the TIM Group actively contribute to accelerating digital transformation, a key element in reducing GHG emissions, and have cross-cutting application in multiple sectors of the economy that are also included within the annexes to the Delegated Regulation (including manufacturing or transportation).

The impact and role of telecommunications is therefore very broad in achieving climate goals. Aware of this, the TIM Group pursues specific goals for improvement (such as the certification of Data Centers in line with the European Code of Conduct), and integration of technological services on the transmission network (think of the continuous modernization of network infrastructure).

# Independent Auditor's Report



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Independent auditor's report on the consolidated disclosure of non-financial information in accordance with Article 3, par. 10, of Legislative Decree 254/2016 and with Article 5 of CONSOB Regulation adopted with Resolution n. 20267 of 18 January 2018

(Translation from the original Italian text)

To the Board of Directors of  
TIM S.p.A.

We have been appointed to perform a limited assurance engagement pursuant to Article 3, paragraph 10, of Legislative Decree December 30, 2016, n. 254 (hereinafter "Decree") and article 5 of CONSOB Regulation adopted with Resolution 20267/2018, on the consolidated disclosure of non-financial information of TIM S.p.A. and its subsidiaries (hereinafter the "Group" or "TIM Group") for the year ended December 31, 2022 in accordance with article 4 of the Decree and approved by the Board of Directors on March 15, 2023 (hereinafter "DNF").

Our limited assurance engagement does not cover the information included in the paragraph "European Taxonomy" of the DNF, that are required by article 8 of the European Regulation 2020/852.

## Responsibilities of Directors and Board of Statutory Auditors for the DNF

The Directors are responsible for the preparation of the DNF in accordance with the requirements of articles 3 and 4 of the Decree and the "Global Reporting Initiative Sustainability Reporting Standards" defined by GRI - Global Reporting Initiative (hereinafter "GRI Standards"), identified by them as a reporting standard.

The Directors are also responsible, within the terms provided by law, for that part of internal control that they consider necessary in order to allow the preparation of the DNF that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for identifying the contents of the DNF within the matters mentioned in article 3, par. 1, of the Decree, considering the business and the characteristics of the Group and to the extent deemed necessary to ensure the understanding of the Group's business, its performance, its results and its impact.

The Directors are also responsible for defining the Group's management and organization business model, as well as with reference to the matters identified and reported in the DNF, for the policies applied by the Group and for identifying and managing the risks generated or incurred by the Group.

The Board of Statutory Auditors is responsible, within the terms provided by the law, for overseeing the compliance with the requirements of the Decree.

## Auditor's independence and quality control

We are independent in accordance with the ethics and independence principles of the *International Code of Ethics for Professional Accountants* (including International Independence Standards) (IESBA Code)

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issued by the *International Ethics Standards Board for Accountants*, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. Our audit firm applies the *International Standard on Quality Control 1 (ISQC Italia 1)* and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

#### Auditor's responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the DNF with the requirements of the Decree and of the *GRI Standards*. Our work has been performed in accordance with the principle of "*International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information*" (hereinafter "*ISAE 3000 Revised*"), issued by the *International Auditing and Assurance Standards Board (IAASB)* for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the DNF is free from material misstatements. Therefore, the extent of work performed in our limited assurance engagement was lower than that required for a full examination according to the *ISAE 3000 Revised* ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the DNF were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the DNF, documents analysis, recalculations and other procedures aimed to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis of the relevant matters in relation to the activities and characteristics of the Group reported in the DNF, in order to assess the reasonableness of the selection process applied in accordance with the provisions of article 3 of the Decree and considering the reporting standard applied;
2. analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the Decree;
3. comparison of the economic and financial data and information included in the DNF with those included in the TIM Group consolidated financial statements;
4. understanding of the following aspects:
  - Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
  - policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
  - main risks generated or suffered related to the matters indicated in the article 3 of the Decree.

With regard to these aspects, we obtained the documentation supporting the information contained in the DNF and performed the procedures described in item 5. a) below.
5. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the DNF. In particular, we have conducted interviews and discussions with the Management of TIM S.p.A.



and with the personnel of TIM S.p.A. and TIM S.A. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the DNF.

Furthermore, for significant information, considering the Group activities and characteristics:

- at Group level
  - a) with reference to the qualitative information included in the DNF, and in particular to the business model, policies implemented and main risks, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidences;
  - b) with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- For the Group entities TIM S.p.A. and TIM S.A., that we have selected based on their activities, relevance to the consolidated performance indicators and location, we have carried out remote interviews during which we have had discussions with management and have obtained evidence about the appropriate application of the procedures and the calculation methods used to determine the indicators.

#### Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the DNF of the TIM Group for the year ended on December 31, 2022 has not been prepared, in all material aspects, in accordance with the requirements of articles 3 and 4 of the Decree and the *GRI Standards*.

Our conclusion on the DNF of the TIM Group do not refer to the information included in the paragraph '*European Taxonomy*' of the DNF itself, that are required by article 8 of the European Regulation 2020/852.

Torino, March 30, 2023

EY S.p.A.  
Signed by: Ettore Abate, Auditor

*This report has been translated into the English language solely for the convenience of international readers.*



