

Policy for Prevention, Restriction and Management of Moral and Sexual Harassment and Bullying Practices

TIM S.A.



POLICY FOR PREVENTION, RESTRICTION AND MANAGEMENT OF MORAL AND SEXUAL HARASSMENT AND BULLYING PRACTICES

PREMISE

TIM group companies in Brazil recognize and value diversity in all their relationships and as a signatory to the United Nations Global Compact since 2008 (<https://www.unglobalcompact.org/>), TIM Brasil reiterates its commitment to the application of the ten principles of the Pact, which reinforces the appreciation and respect for human rights and rejects all forms of discrimination, not carrying out and/or tolerating any discriminatory, embarrassing expression, attitude or behavior, moral and sexual harassment, *bullying* and *stalking* in relationships and in the work environment, including the positioning of employees and third parties on their social networks or other interactions, in any environment, including digital, on TIM Brasil's official social networks or outside them.

Inclusive culture is a fundamental pillar for promoting a positive experience in the workplace and for people to express themselves and develop in a good organizational climate. Therefore, we value an attitude of respect for differences, physical and moral integrity, rights and dignity of people and we repudiate any and all forms of discrimination, intolerance, offense, persecution, intimidation and/or verbal or non-verbal harassment, especially of a sexual nature, or related to gender, affective-sexual orientation, ethnic/racial origin, nationality, cultural background, gender identity and expression, disability, age group, religion, socioeconomic status, belief, among others.

RECIPIENTS

This policy applies to all TIM Brasil employees, interns, and young apprentices, and to third-party employees, business partner companies, supplier companies and service providers in the TIM Brasil interactions and/or work environment, including teleworking and/or home office.

OBJECTIVE AND FIELD OF APPLICATION

This policy aims to define the guidelines, criteria and processes to prevent, curb and manage episodes of any act of moral and sexual harassment, bullying, discrimination and intimidation, which applies both at TIM Brasil headquarters and offices, including external areas , as well as outside TIM locations, for example, in client offices, during events and corporate trips, meetings, virtual spaces (intranet, e-mail, chat, video conferencing tools, social network, internal channels, etc.) and all social situations related to TIM Brasil and its business.

Broadly, this policy also applies to any work context, process or professional relationship and does not tolerate any form of bullying, discrimination or harassment, real or perceived, based on gender, race, ethnicity, skin color, belief, religion or ideology, affective-sexual orientation, gender identity or expression (including self-image, appearance or behavior), clothing, gender reassignment, nationality, age, presence of disability, marital status, civil union, pregnancy and maternity, medical conditions also related to pregnancy or childbirth, potential/alleged victims of domestic violence, sexual offenses, persecution, unemployment or any other condition, as well as repudiating any and all activities in a condition analogous to slavery, as well as work childish.

Harassment is understood as a wide range of behaviors of an offensive or threatening nature, which bother or disturb in an inconvenient way, such as constant persecution, suggestion or pretense towards someone to defame or show hostility, aversion to a person for their personal belonging (or a family member) to a race, ethnicity, skin color, creed, religion, ideology, gender, nationality, age, marital status, presence of disability, pregnancy/maternity status and/or any other category protected by law. It can be attempted or actually committed in a way – isolated or repeated, of a psychological, physical or verbal nature, which:

- Its purpose or effect is to interfere with a person's lifestyle or dignity, causing a general state of fear or anxiety;
- Has the objective or effect of creating an intimidating, hostile and offensive environment in work relationships;
- Has the objective or produces the effect of unreasonably interfering with a person's work performance;
- Have the effect of impacting a person's different employment opportunities.

Moral harassment:

Moral harassment is any conduct linked to organizational culture and hierarchy, which is characterized as the offense or violation of a person's morals, dignity and self-esteem, which refers to their freedom, honor, health (mental or physical) or image. It can occur through hostile practices, words, writings, acts, behaviors, gestures or any other situation that brings harm to the person, making them feel destabilized and/or inferior in their work.

It is characterized by being abusive conduct, of a psychological nature, which attacks psychological dignity, in a repetitive and prolonged manner, and which exposes the person to humiliating and embarrassing situations, capable of causing offense to personality, dignity or psychological integrity. , putting the person's health, life and employment at risk.

Moral harassment at work - In the workplace, cruel and inhumane acts that characterize a violent and unethical attitude in relationships, practiced by one or more people against their subordinates or peers, co-workers with the aim of excluding them of their duties or deteriorating the work environment, are also moral harassment. The habituality of the conduct and the intentionality (the discriminatory purpose) are essential for the characterization of moral harassment.

Although bullying often occurs in the workplace, it is possible that it occurs in other environments, as long as its exercise is related to power relations developed in the professional sphere.

There are four main ways in which moral harassment is carried out: causing the victim to be isolated in the workplace; demanding strict compliance with work as a pretext for psychologically mistreating the victim; make indirect negative references to the victim's privacy; and lack of justification (free of charge) to negatively discriminate against the victim.

Sexual harassment:

Sexual harassment is defined as any form of approach, verbal or physical, persistent and unsolicited, in which the harassing person aims to obtain sexual advantages from the harassed person, using a more favorable situation in the work relationship.

In Brazil, sexual harassment is a crime, defined in article 216-A of the Brazilian Penal Code as "embarrassing someone with the intention of obtaining sexual advantage or favor, the agent taking precedence over his status as hierarchical superior or ancestry inherent to the exercise of employment, office or function". The expected penalty is imprisonment for 1 (one) to 2 (two) years.

It is a type of harassment that can take the form of undesirable and unsolicited words, actions, looks, gestures, symbols or behaviors of a sexual nature that make the person targeted by the harassment feel uncomfortable.

Sexual harassment is an act that meets the following characteristics:

- unwanted, that is, not requested/not consented to by the person being harassed;
- with sexual connotations, referring to the person's free sexual self-determination;
- expressed in physical, verbal or non-verbal form (with specific words and/or actions).

And it can be expressed in the following examples of behavior:

- Unwanted and inappropriate physical contact of a sexual nature, such as: touching, pinching, caressing, kissing, hugging, grabbing, brushing or hitting another person's body (whether with one's own body or with other objects);
- Unwanted sexual advances or proposals, such as: requests for sexual favors, accompanied by threats or promises, implicit or explicit, regarding the evaluation of work performance, promotion, other benefits or, vice versa, work disadvantages;
- Gestures, sexual and/or sexist jokes, teasing, vulgar or inappropriate winks, unwanted or annoying voluntary physical contact and verbal remarks about a person's physical appearance or anatomical parts of the body;
- Sexual or discriminatory exposures in the workplace or publications of pornographic or sexually degrading material;

Harassment can occur regardless of gender, gender identity, emotional-sexual orientation and can also occur between people of the same gender.

Sexual harassment:

Sexual harassment is also a crime, according to art. 215-A of the Brazilian Penal Code, defined as “performing a libidinous act against someone and without their consent with the aim of satisfying one’s own lust or that of a third party”. The prescribed penalty is imprisonment, from 1 (one) to 5 (five) years, if the act does not constitute a more serious crime.

Bullying:

Bullying is any intentional and repetitive act of physical or psychological violence that occurs without evident motivation, carried out by an individual or group, against one or more people, in any environment, with the aim of intimidating or attacking them, causing pain and anguish to the potential/alleged victim, in a relationship of power imbalance between the parties involved, which places the individual in a state of vulnerability.

Stalking:

Stalking is repetitive acts of physical or psychological persecution that impose fear on someone. Such persecution can occur in person or virtually (incessant calls and messages, contacts and searches through social networks).

Stalking is a crime and is defined in art. 147-A of the Brazilian Penal Code: "Persecuting someone, repeatedly and by any means, threatening their physical or psychological integrity, restricting their ability to move around or, in any way, invading or disturbing their sphere of freedom or privacy. The penalty is imprisonment, from 6 (six) months to 2 (two) years and a fine, if the act does not constitute a more serious crime.

DISCLOSURE

The content of this document will be disseminated to all employees through the availability of an infographic on the Company's internal channels and formalized via email highlighting the main guidelines for executives.

GENERAL DESCRIPTION OF THE PROCESS AND RESPONSIBILITIES

It is essential for the care and protection of people, the work environment and TIM Brasil's reputation that all employees can report, in good faith, anonymously or not, any acts of harassment, intimidation or inappropriate behavior. Therefore, TIM emphasizes the importance of people reporting such conduct and the company's commitment to supporting and protecting any alleged victims or witnesses.

TIM undertakes to investigate and manage any complaint related to an episode of harassment, inappropriate behavior, *bullying*, discrimination, intimidation and *stalking*, guaranteeing confidentiality and not tolerating any type of retaliation against a person who in good faith:

- report or report prohibited or inappropriate behavior in the workplace;
- actively participate in the reporting/denunciation process;
- provide support for the report/complaint analysis and investigation process.

The cases provided for in this Policy must also be dealt with within the scope of the Complaints Investigation Committee, made up of the Audit, Legal, Human Resources & Organization, Compliance and Security Operations, within the scope of the Business Support Officer function, which must meet in a timely manner.

This Commission must evaluate and deliberate on all reports of harassment, bullying or discrimination, except when the person reported is a member of the Commission or holds a position on the board or vice-presidency, in which cases it will follow the flow defined in PL.835 of the Communication Channel. Complaints.

Monitoring these complaints or any other processes linked to them is the responsibility of the Commission, in order to detect possible weaknesses in the internal control and risk management system.

After defining the disciplinary measure by the Commission, the complaint will be closed in the Reporting Channel and only then will the Human Resources & Organization, and any other function that is necessary, must proceed with the application of the respective defined measure, according to the scenario of origin, incompleteness or unfoundedness.

TIM also reinforces that no adverse consequences may affect those people who, in good faith, make a report about possible situations of disrespect for this policy or any other current internal regulatory document, and confidentiality is also assured to the reporting person in the case of



reports. identified, except when essential for the proper investigation of the facts. The confidentiality of the complaint may be broken due to a court order.

This prerogative does not, however, preclude the Company's decision-making within the scope of people management, with regard to the application of disciplinary measures and termination of the employment contract for other reasons.

This policy also provides that making a report in bad faith, with the sole purpose of harming another person, is also considered a violation of this policy, and is therefore subject to disciplinary action.

In the event of occurrence or attempt of moral and sexual harassment, bullying, discrimination, intimidation, stalking or inappropriate behavior, the employee - without prejudice to the possibility of appealing to the competent authorities - has the right to report it through the Channel Whistleblowers, the company's main channel for this purpose, available in Portuguese and English versions for internal and external audiences, which can be accessed either via the Corporate Intranet (TIM UP) or via the Internet (<https://site.tim.com.br/rj/canal-de-denuncias>) or by telephone (0800 900 8007), available 24 hours a day, 7 days a week. The Reporting Channel is accessible to people with visual and hearing impairments.

The whistleblower is provided with the possibility of choosing the typology that best fits the facts to be reported on the Reporting Channel portal, namely Moral Harassment/ Sexual Harassment/ Discrimination/ Bullying and Stalking.

The Reporting Channel managed by the Audit Function - Planning Forensic & Special Audit Projects must handle the complaint as provided for in its regulatory framework, POP.836 - Reporting Channel.

Any situation related to the cases provided for in this policy that is known to any employee, through a complaint from another person, statements portrayed in formal documents or if they have witnessed any fact, will have the obligation to immediately relay it to the Reporting Channel, keeping this communication confidential, that is, it cannot disclose it to third parties outside the Reporting Channel, much less reproduce a copy of the reported facts. Also, when necessary, they must provide their collaboration and support in investigating the complaint.

The omission may also constitute a violation of this policy, that is, the employee's failure to send/pass on a complaint received from another person violates the policy, as well as the TIM SA Code of Ethics and Conduct, Therefore, this employee is subject to the application of disciplinary measures by the Human Function Resources & Organization .



Cases received by the Human Function Resources & Organization , in addition to being reported to the Reporting Channel, must be notified to the alleged victims regarding the opening of the report.

COMMITMENTS

TIM Brasil commitments

In the context of cases related to acts of harassment, moral and sexual, intimidation or bullying, TIM undertakes to:

- Promote and ensure an environment and working relationships free from conduct and practices that do not comply with the values and principles set out in the company's Code of Ethics and Conduct;
- Ensure that each employee is treated with respect by their manager, colleagues, supplier and partner companies and customers, in order to preserve their psychological and physical integrity;
- Provide content, educational and awareness-raising actions on moral and sexual harassment, *bullying* and other forms of discrimination, as well as on the content and applicability of this policy for all employees, ensuring also means of dissemination to third parties, partner companies, suppliers and service providers;
- Do not tolerate any behavior of moral and sexual harassment, intimidation or *bullying*, as well as any type of discrimination in the environment and work relationships;
- Investigate all complaints registered in the Reporting Channel;
- Protect all employees, alleged victims, guaranteeing privacy and preventing any retaliation;
- Offer support and psychological support to the harassed person/alleged victim immediately after becoming aware of the complaint;
- Adopt necessary measures to ensure the cessation of unwanted behavior towards the harassed person;
- Take responsibility within the TIM Group, through the Complaints Investigation Committee, for the case reported and adopt the necessary and appropriate measures for treatment;

Commitments of employees

In the context of cases related to acts of moral and sexual harassment, intimidation or bullying, employees undertake to:

- Respect and comply with all the premises of this policy, in order to create and maintain a respectful and harmonious work environment, avoiding intimidating, hostile, degrading, humiliating, offensive and undesirable words, conduct and behavior;
- Act with a focus on respecting people's rights, values and dignity in all work relationships, in an environment in which intimidation, harassment, bullying and inappropriate sexual behavior are unacceptable;
- Report, in good faith, any behavior, practice or fact that does not comply with this policy, if you have witnessed it, received any evidence, learned about it through another person or have been the person harassed/alleged victim;
- Do not make a report in bad faith with the aim of harming another person, aware that this act is also considered a violation of this policy and may be subject to disciplinary action.

Leadership/immediate management commitments

The immediate leadership/management team must comply with the above commitments (item Commitments of Employees) and additionally undertakes to:

- Be an example of conduct and behavior in complying with this policy;
- Ensure, encourage and promote an environment and working relationships in your team based on respect and compliance with all the premises of this policy;
- Curb and prevent any intimidating, hostile, degrading, humiliating, offensive, undesirable and in disagreement with this policy;
- Act to prevent acts of harassment, moral and sexual, intimidation or bullying in the exercise of your management, ensuring the dissemination and guidance of the topic, including the content of this policy, to the team;
- Report to the Reporting Channel or to the representative person/business partner (Business Partner) HRO any situation that does not comply with this policy.

POLICY IMPLEMENTATION

The role of Human Resources & Organization is responsible for implementing and monitoring this policy in alignment with the premises and initiatives of the Telecom Italia Group.

GLOSSARY

Harassment : Harassment is understood as a wide range of behaviors of an offensive nature, which bother or disturb in an inconvenient way. In the legal sense, it is threatening or disruptive behavior.

Harassment is attempted or committed conduct - isolated, repeated, psychological, physical or verbal - that aims to defame or show hostility, aversion to a person because of his or her (or a family member's) personal belonging to a race, skin color, ethnicity, creed, religion, ideology, gender, nationality, age, marital status, presence of disability, pregnancy/maternity status and/or any other category protected by law that has the purpose or effect of interfering with lifestyle habits or on a person's dignity, causing a general state of fear or anxiety; create an intimidating, hostile and offensive work environment in work relationships; unreasonably interfere with a person's work performance; impact on a person's different employment opportunities.

Moral harassment: It is characterized as the offense or violation of a person's moral order, such as those relating to their freedom, their honor, their health (mental or physical), their image. It can occur through hostile practices, words, acts, behaviors, gestures or any other situation that brings harm to the employee, causing the person to be destabilized and/or inferior in their work.

Sexual harassment: Sexual harassment is defined as any form of approach, verbal or physical, persistent and unsolicited, where the harassing person aims to obtain sexual advantages from the harassed person using a more favorable situation in the work relationship.

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- with sexual connotations, referring to the person's free sexual self-determination;
- expressed in physical, verbal or non-verbal form (with specific words and/or actions).

BSO: Acronym for Business Support Officer, function responsible for ensuring the acquisition, logistics and management processes of properties and services to support the business and

business efficiency, ensuring the security and protection of the company's material and immaterial resources and the management of anti fraud.

Bullying: Any intentional and repetitive act of physical or psychological violence that occurs without evident motivation, carried out by an individual or group, against one or more people, with the aim of intimidating or attacking them, causing pain and anguish to the potential/ alleged victim, in a relationship of power imbalance between the parties involved.

Report: Means action to report; denunciation. Attempt to bring to the attention of the competent authority a certain illicit and illegal fact; denunciation.

Discrimination: unfair or negative treatment of a person because they belong to a certain minority group (race/ethnicity, age or gender, etc.).

Gender: social aspect attributed to perceived differences between the sexes (man, woman or non-binary).

Minorized social groups : social groups historically excluded from spaces of power (political, economic and social) such as black people, LGBTI+ people, people with disabilities, etc.

HRO: Acronym for Human Resources & Organization , function responsible for ensuring the definition and conduct of policies relating to the company's human resources, through the evolution of organizational models, workforce planning and development of the skills necessary for the company, in coherence with technological developments and challenges business, as well as efficiency and sustainability objectives. The role ensures the conduct of occupational health and safety and environmental programs, and the relationship with trade union organizations and internal and external key stakeholders. It also guarantees internal communication and *business partnership* activities to manage, with the commitment of those responsible, the processes of evolution of the company's culture, in line with the principles of inclusion and valuing the contribution of each employee

Gender identity: perception that a person has of themselves as being male, female or non-binary, regardless of their biological sex and the gender assigned to them at birth.

Affective-sexual orientation: is the emotional and/or sexual attraction of people. The best known orientations are: homosexual, people who are attracted to people of the same gender; bisexual, people who are attracted to people of both genders – men and women; and heterosexual, people who are attracted to people of the opposite gender.

UN Global Compact – 10 principles

1. Companies must support and respect the protection of internationally recognized human rights.
2. Ensure that you do not participate in violations of these rights.
3. Companies must support freedom of association and the effective recognition of the right to collective bargaining.

4. The elimination of all forms of forced or compulsory labor
5. The effective abolition of child labor
6. Eliminate employment discrimination
7. Companies must support a preventative approach to environmental challenges
8. Develop initiatives to promote greater environmental responsibility
9. Encourage the development and dissemination of environmentally friendly technologies
10. Companies must combat corruption in all its forms, including extortion and bribery

Reporting person: Person who reports a fact, a crime or a criminal. Who makes a complaint or accuses someone of responsibility for an illicit act, an irregularity, a crime.

Race: this is the classification of people by their physical evidence, such as the shape of the eyelid, skin color, hair color and shape, the shape of the nose, the shape of the head, among other characteristics.

Stalking: These are repetitive acts of physical or psychological persecution that impose fear on someone. Such persecution can occur in person or virtually (incessant calls and messages, contacts and searches through social networks).

Version 00 - This is the first version of this policy, approved by TIM's Executive Board and published on 12/14/2021.

A copy of this document is not valid in printed form.