



Eni's position on conflict minerals

Background

Eni supports the goal of preventing the exploitation of minerals for the purpose of funding or supporting human rights violations. In the Democratic Republic of the Congo ("DRC") region, human rights violations have been found to be partially financed by the exploitation and trade of certain "conflict minerals" (known as "3TG", consisting of Tantalum, Tin, Tungsten - and the minerals from which they are derived, i.e. Columbite-tantalite (coltan), cassiterite and wolframite - and Gold).

Our position

As part of Eni's commitment to corporate sustainability and respecting and promoting human rights in our own operations including the activities performed by our Business Partners, Eni has in place guidelines, procedures and standard contractual terms & conditions that:

- Require compliance with human rights standards as prerequisite for qualification;
- Require compliance with the Eni Code of Ethics and Human Rights Guidelines as a contractual obligation towards Eni;
- Require periodical monitoring of compliance with those standards through audits.

We believe that Eni's utilization of Conflict Minerals is immaterial to our operations and final products. Our main E&P business segment does not implicate Conflict Minerals concerns as our oil and gas products do not contain Conflict Minerals. The same applies to our Gas&Power segment. Finally, our refining and marketing segment manufactures fuels and lubricants that may contain traces of conflict minerals as these minerals are intentionally added to the catalysts used in the production process and may not be washed out completely from the finished products. For any of our products that contain or may contain Conflict Minerals, we will expect our suppliers (and will require suppliers to pass the same requirements on to their suppliers) to acknowledge and agree to our guidelines and procedures, including our Code of Ethics and Human Rights Guidelines. Our standard contractual terms regarding the supply of products that contain or may contain Conflict Minerals include binding and clear-cut requirements regarding responsible sourcing. This in order to support Eni's effort to use for its products 3TG that do not directly or indirectly finance or benefit armed groups in the DRC region. Our relationships with our suppliers is evaluated on an ongoing basis, taking into account their commitment in collaborating with Eni in building a responsible supply chain.



Eni's due diligence measures

Due to the complexity of our supply chain, although we have made progress in implementing policies and procedures to help ensure reasonable due diligence and responsible sourcing of Conflict Minerals, it will take us a significant additional investment of time and resources to determine the mine or location of origin of our necessary conflict minerals with the greatest possible specificity. To date, we have implemented a number of initiatives to determine the use, source and origin of any Conflict Minerals, which we deem to be necessary to the functionality or the manufacturing of our products. These include:

- We have established a "Conflict Minerals Compliance Program" to review any use of Conflict Minerals in our products or in the manufacturing of our products. We have developed this program based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and we will take into account other international standards as appropriate;
- We have required our relevant suppliers to implement a policy regarding responsible sourcing of Conflict Minerals, including the exercise of due diligence to investigate the source of these minerals, and encouraging our suppliers to do likewise with their suppliers. To date all of our suppliers of conflict minerals stated that they have adopted a policy regarding responsible sourcing and have made progress in tracing the supply chain. We have obtained representations that a number of the smelters in our supply chain are certified smelters with the Reasonable Minerals Initiative;
- We have engaged with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. Our suppliers' willingness to comply with this initiative is a factor in our sourcing decisions;
- Since the beginning of the compliance program, we have included in all new supply contracts entered into by the Eni Group regarding products that contain or may contain conflict minerals updated purchasing terms and conditions to reflect this policy;
- We are adopting procedures and controls and we are implementing training activities in order to raise internal awareness of the conflict minerals issues and accurately report on the Company's activities regarding conflict minerals use and sourcing;
- We endorse transparency in implementing this policy and we make available reports on our progress to relevant stakeholders and the public.

We will continue planning and implementing steps to determine the use, source and origin of any Conflict Minerals, which we deem to be necessary to the functionality or the manufacturing of our products.

Whistle-blowing process



Concerns and violations of this policy can be reported to Eni via the existing channels for ethics
or compliance violations at
<https://www.eni.com/it/IT/azienda/governance/segnalazione.page>

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