ENI’S APPROACH TO HUMAN RIGHTS

Eni works in 67 different Countries, with around 31,000 employees all over the world.

Eni’s approach to human rights is integrated into its mission and it is carefully explained in Eni’s Statement on Respect for Human Rights, approved by the Board of Directors on December 2018.

Eni believes that businesses must respect internationally recognized human rights, as established in the UN Guiding Principles on Business and Human Rights. They apply to all states and all businesses worldwide and are currently being implemented by companies, governments and their stakeholders everywhere in the world.

Eni’s approach to human rights mirrors the UN Guiding Principles’ structure:

**COMMITMENT TO RESPECT FOR HUMAN RIGHTS**

- Eni’s Statement on Respect for Human Rights
- Human Rights embedded in Eni’s policies and governance processes
- Continuous engagement and training on human rights for its people and its business partners
- Partnership with other organizations to promote the implementation of the Business and Human Rights agenda

**DUE DILIGENCE**

- Wide range of processes and tools to assess salient human rights issues, risks and impacts
- Application of the Due Diligence requirement to salient human rights issues
- Design, implementation and reporting of Eni’s Human Rights Due Diligence process to ensure alignment with the UN Guiding Principles on Business and Human Rights

**ACCESS TO REMEDY**

- Grievance Mechanism to manage communities and individuals’ grievances
- Whistleblowing process that enables anyone to send information concerning violations of the Code of Ethics, including human rights issues

**ENI’S SALIENT HUMAN RIGHTS ISSUES**

**HUMAN RIGHTS IN THE WORKPLACE**

- Equal treatment
- Safe and healthy working conditions
- Freedom of association and collective bargaining

**HUMAN RIGHTS IN ENI’S RELATIONS WITH SUPPLIERS AND OTHER BUSINESS PARTNERS**

- Modern slavery
- Migrant workers
- Freedom of associations and collective bargaining
- Working conditions
- Safe and healthy working conditions

**HUMAN RIGHTS IN HOST COMMUNITY RELATIONS**

- Land rights
- Environmental impacts that affect livelihoods, health, availability of water
- Closing of projects

**HUMAN RIGHTS AND SECURITY**

- Excessive use of force by public and private security forces
- Employee safety in high-risk environments

**ACCESS TO REMEDY**
**ENI’S COMMITMENT TO RESPECT FOR HUMAN RIGHTS**

Eni began working to integrate respect for human rights into its policies and practices in the 2000s and has experienced renewed impetus in the last four years.

In 2018, Eni published its **Statement on Respect for Human Rights**, whose ultimate goal is to illustrate Eni’s approach to human rights, the standards adopted and the commitments to meet its responsibilities.

Eni’s Statement represents both Eni’s manifesto on human rights and the summary of its journey over the last decade whose strategic landmark was the integration of human rights both into the **internal legal framework**, and a number of policies and procedures.

The CEO and the Board of Directors were actively involved from the beginning and committed in spreading along the entire organization Eni’s vision on human rights. In 2017, an internal **Working Group on Human Rights and Business** (HRBWG) has been appointed to design the Company’s Human Rights agenda.

To ensure that everybody who works in or for Eni is aware of the company’s commitment to respect human rights, Eni developed training and awareness-raising activities dedicated to its employees and Business Partners.
HUMAN RIGHTS DUE DILIGENCE

The final list of human rights salient issues was shared with external stakeholders in 2018.

In 2017, the HRBWG started its activities by hosting a Workshop aimed at launching the identification of the company’s salient human rights issues, with the support of the Danish Institute for Human Rights. In 2018, the final list of salient issues identified by the participants to the workshop was shared with external stakeholders and experts.

**ENI APPLIES THE HUMAN RIGHTS DUE DILIGENCE TO ITS SALIENT HUMAN RIGHTS ISSUES**

The due diligence process is applied to the functional areas which are most exposed to human rights risks, and namely Human Resources, Suppliers and other Business Partners, Security and Community Relations, with a focus on salient human rights issues associated with each specific function.

Adoption of a Commitment on Business and Human Rights

The UN Guiding Principles require companies to identify, prevent, mitigate and account for how they address their impacts on human rights. Some of the impact assessment processes carried out by Eni are specific stand-alone human rights assessments, while other assessments are company processes aimed at achieving a wider set of company goals, in which human rights related content is integrated.

**HUMAN RIGHTS IMPACT ASSESSMENTS**

**STAND-ALONE ASSESSMENTS**

- Company-wide assessment conducted in 2017
- Human Rights Compliance Assessments (HRCA)
- Human Rights Impact Assessments (HRIs)

**OTHER CROSS-FUNCTIONAL ASSESSMENTS**

- ISO26000 guidelines based assessments
- Integrated Risk Management process (IRM)
- Environmental Social and Health Impact Assessments (ESHIAs)
### ACCESS TO REMEDEY

Eni is actively engaged in assuring a proper access to remediation measures, providing remediation in case of adverse human rights impacts it might have caused or contributed to and in cases where the impact is directly linked to its operations, products or services.

Grievance mechanisms and other reporting channels are made available to enhance the opportunities for the company to identify and promptly investigate potential and actual human rights impacts and take appropriate action. Furthermore, Eni does not prevent access in any way to state-based judicial or non-judicial mechanisms and co-operates in good faith with such mechanisms.

### ENI’S COMMITMENT TO REMEDEY

How to engage in remediation

- Operational-level grievance mechanisms
- Cooperation with judicial or state-based non-judicial mechanisms

### ENI’S GRIEVANCE MECHANISMS

Main elements:
- Grievances are recorded through the SMS
- Consultation with local communities
- Human Rights-based approach
- Multiple access points

ISSUED IN 2016

72% COMPLAINTS RESOLVED AND CLOSED IN 2018

Eni uses a Whistleblowing reporting management system that enables anyone - whether Eni’s people, stakeholders or other third parties to send reports on issues pertaining to the internal control and risk management system or other violations of the Code of Ethics, including possible violations of human rights.

Eni guarantees confidentiality and anonymity to whistleblowers as well as envisage possible measures for any potential retaliation perceived.

### WHISTLEBLOWING

- Anyone, including third parties or employees, can send information
- Eni is committed to protecting whistleblowers
- Whistleblowing reports can refer to:
  - Internal Control Issues: Laws, Regulations, Corporate rules
  - Violations of Code of Ethics: Including violations of Human Rights

31 REPORTS RECEIVED IN 2018 CONCERNING HUMAN RIGHTS
WORKING WITH STAKEHOLDERS

**SPECIALIZED THINK TANK**

Institute for Human Rights and Business: since 2012, Eni is an active contributor to the activities of the Organization.

The Danish Institute for Human Rights: several works done together in last decade.

**INTERNATIONAL AGREEMENTS**

IndustriAll: Renewed the Global Framework Agreement with national and international Trade Unions.

**BUSINESS ASSOCIATIONS**

WBCSD: participating in several working groups and contributing to the CEO Guide to Human Rights.

IPIECA: participating in several working groups with peers.

**INSTITUTIONS**

Italian Interministerial Committee for Human Rights (CIDU): active collaboration with the CIDU participating in multistakeholder initiatives.

OECD guidelines: dialogue with the Italian National Contact Point.

Active participation to the UN Forum on Business and Human Rights.

Several partnerships with FAO, UNIDO, UNDP to foster local development projects.

**CORPORATE HUMAN RIGHTS BENCHMARK**

Eni confirmed its leadership in designing an effective approach to human rights, ranking in the top 4% among the 200 companies assessed in 2019 by the Corporate Human Rights Benchmark (CHRB).

**UN GLOBAL COMPACT**

Eni has been confirmed in 2019 as a Global Compact LEAD participant, in a sign of its ongoing commitment to the United Nations Principles for responsible business.
Eni SpA

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