



SLAVERY AND HUMAN

TRAFFICKING STATEMENT 2018



ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018

This statement refers to Eni Group¹ (herein referred to as “Eni”, “we”, “us”, or “our”) in accordance with the Modern Slavery Act 2015 and describes the steps taken by Eni during 2018 to prevent slavery and human trafficking in its supply chain or in any part of its own business.

67
countries
in the world

32k
employees

197mln€
R&D costs

95mln€
Community
Investments

Eni is committed to maintaining and improving its practices to combat slavery and human trafficking in its operations and supply chain and expects its Business Partners² to respect Human Rights. We have zero tolerance towards such Human Rights violations and expect our supply chain to comply accordingly.

INTRODUCTION

Eni's approach to Human Rights builds on the dignity of every human being and on the companies' responsibility to contribute to the well-being of the communities surrounding its business activities. This vision goes beyond obtaining a social licence to operate: it is an integral part of Eni's identity and its way of doing business. Indeed, we believe that business must respect internationally recognized Human Rights, as established in the UN Guiding Principles on Business and Human Rights. Eni is

almost 32,000 people in 67 Countries around the world. It is a key player in the exploration and production of oil and natural gas, the refining and sale of petroleum products, the generation and marketing of electricity.

Upstream

Eni engages in oil and natural gas exploration, field development and production, mainly in Algeria, Angola, Congo, Egypt, Ghana, Italy, Kazakhstan, Libya, Mozambique, Nigeria, Norway, Oman, United Arab Emirates, the United Kingdom and the United States, overall in 43 countries.

Mid-Downstream

Eni sells gas, electricity, LNG and oil products in the European and Extra European markets, also leveraging on trading activities. Products availability is ensured by oil and gas production in the upstream business, long-term gas supply contracts, combined cycle power plants, Eni's refinery system as well as by Versalis' chemical plants. The supply of commodities is optimized through trading activities. Integrated business units enable the company to capture synergies in operations and reach cost efficiencies.

Our business and operating model is described in detail in our [Annual Report](#).

Our supply chain

Our operations are supported by a global supply chain that includes suppliers of goods, works and services from all over the world. For the management of local procurement needs, each Eni subsidiary abroad has its own procurement department, which operates in compliance with Eni's procurement management system guidelines.

In FY 2018, more than 8,500 suppliers were awarded contracts globally.

ABOUT ENI

Eni is an energy company. We are working to build a future where everyone can access energy resources efficiently and sustainably. Our work is based on passion and innovation, on our unique strengths and skills, on the quality of our people and in recognizing that diversity across all aspects of our operations and organization is something to be cherished.

We believe in the value of long term partnerships with the countries and communities where we operate. Eni employs

1. Eni Group refers to the parent company Eni S.p.A. and its consolidated subsidiaries as identified in the [Annual Report](#).

2. Any third party, non-employee providing products or services for Eni or any third party that acts on behalf of or for Eni's interest.

HUMAN RIGHTS IN OUR ORGANIZATION, POLICIES AND COMMUNICATION

Our Corporate Governance: focus on Human Rights

Eni has set up a governance structure that is able to support sustainable development strategies, identifying the Board of Directors of Eni S.p.A. as the body responsible for defining - upon CEO proposal - the Company's strategy and objectives, including those related to sustainability and approving results. The latter are reported together with financial results in an Integrated Annual Report and regularly presented to the Shareholders' Meeting.

The CEO ensures the implementation of the Board's resolutions and periodically reports to the Board.

The Board of Directors of Eni S.p.A. also approves the most important internal rules, including the Code of Ethics, whose guarantor is the Eni Watch Structure and the Eni Statement on respect for Human Rights.

Further key functions played by the Board, after consultation with the Control and Risk Committee, are:

- The definition of the guidelines for the management of risks, so that they can be properly identified, measured, managed and monitored;
- The periodic review of Eni's main business risks;
- The periodic evaluation of the adequacy and effectiveness of the Internal Control and Risk Management System of Eni.

In particular, with reference to the main risks, the findings of the periodic risk assessment and monitoring activities and related treatment plans are presented to the Control and Risk Committee and to the Board of Directors on a quarterly basis in order to support corporate decision-making. Such findings can include Human Rights risks since they are fully integrated into the Integrated Risk Management (IRM) Model (see paragraph Assessing supply chain risks through cross-functional Human Rights processes).

The Board of Directors is also responsible for defining the risk profile, both as to nature and level of risks in a manner consistent with the company's strategic objectives – including all risks that could affect the medium-to-long-term sustainability of the business.

Starting in 2014, the company's commitment to sustainability was further strengthened by the creation of the Sustainability and Scenarios Committee within the Board, which advises the Board on scenarios and sustainability issues, anticipating the suggestion introduced in the Corporate Governance Code in July 2015. On May 9, 2017 the Board updated the Rules of the Sustainability and Scenarios Committee, making explicit reference to Human Rights within the sustainability issues for which the Committee offers recommendations and advice to the Board.

More detailed information on Human Rights issues addressed by the Board in 2018 is available on [Eni's website](#). The Sustainability function is in charge of coordinating the overall approach of Eni to Human Rights and support-

ing Eni's business/support functions to ensure respect for Human Rights.

The relevant local sustainability functions support those in charge of industrial projects and ensure the implementation of Eni's Human Rights due diligence at the local level, including context-specific Human Rights issues. Furthermore, in 2017 the internal Working Group on Human Rights and Business (HRBWG) was appointed, led by the Sustainability function. The strategic mission of this inter-departmental body was the development of the company's Human Rights agenda. To this aim, the following sub-goals were assigned to the group: i) identifying the main improvement areas; ii) defining the actions required to fill the identified gaps, and iii) developing an action plan for the implementation of the actions. The HRBWG, whose activities terminated in June 2018, met the twofold objective of strengthening Eni's Human Rights approach and performance and designing a road-map for future action. A more detailed description of the HRBWG's activities and outcomes is available on [Eni's website](#).

Our policies and rules on Human Rights

Our work is guided by the values and principles described in Eni's **Code of Ethics**, in **Eni's Statement on respect for Human Rights**, in **"Our Sustainability"**, **"Our people"**, **"Our partners of the value chain"** and **"The integrity in our operations"** policies.

The **Code of Ethics** sets out the main values that guide Eni's actions and contains effective rules of behavior, so that the principles contained therein form a practical guide for corporate operations. In this respect, Eni operates within the reference framework of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the ILO - International Labor Organization - and the OECD Guidelines for Multinational Enterprises. This Code of Ethics forms an integral part of the model of organization, management and control, in order to prevent the commission - in the interest or to the benefit of the Company - of offences punished by the Italian Legislative Decree no. 231 of 8 June 2001. The Code of Ethics applies to all direct or indirect subsidiaries, both in Italy and abroad and has most recently been updated on November 23, 2017.

Eni's Statement on respect for Human Rights mirrors the requirements set out in the UN Guiding Principles starting from an explicit commitment to both implementing the Human Rights Due Diligence and providing access to remedy. The Statement contains a detailed section on Business relationships and respect for Human Rights in the supply chain, providing for instructions on how to assess risks of Human Rights abuses in the supply chain. The document clarifies criteria to identify mitigating and corrective actions to implement should critical issues emerge. Specifically on slavery and human trafficking, the Statement includes Eni's commitment to maintain and improve its practices to identify and combat these Human Rights violations in its supply chain.

Eni's Statement on respect for Human Rights

Approved in December 2018 by the Board of Directors, Eni's Statement sets out Eni's commitment to respecting Human Rights. The document includes specific provisions on modern slavery, supply chain risks and activities performed by third parties. In order to make sure that such commitments are actually implemented, the document includes a number of provisions ranging from training to awareness-raising initiatives, from using the company's leverage with Joint Venture Partners and other Business Partners to expressing concern in case of human rights issues in a country of operation. Specifically on training, the Statement contains a commitment to issue specific instructions and deliver focused training to Eni's employees and other awareness-raising initiatives dedicated to contractors and other Business Partners.

As per risks affecting contractors' workers, Eni explicitly commits to ensuring that third-party companies when working for or together with Eni agree to apply the guarantees provided in the "Human Rights in the Workplace" section to their workers, including suitable contractual clauses against possible violations. Furthermore, Eni demands that any subcontracted activities to be carried out in line with the same requirements included in the Statement. The document sets out Eni's approach to access to remedy and grievance mechanisms, including co-operation with judicial and non-judicial mechanisms, consistently with non-retaliation principles.

Moreover, the **Global Framework Agreement** on International Industrial Relations and Corporate Social Responsibility (GFA), renewed by Eni, the IndustriALL Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL trade unions in July 2016 includes specific provisions regarding the international standards to be explicitly referred to in contract clauses as well as requirements in terms of both qualification processes and subcontractors. The Parties to the Agreement annually meet to share information on the implementation of the GFA and potential sustainability and Human Rights issues.

Finally, in 2018 Eni started the development of a new Supplier Code of Conduct that is going to be spread across the supply chain to ensure the commitment of Eni's suppliers to its essential principles. The Code states Eni's commitment and expectations from suppliers regarding compliance to internationally recognized Human Rights standards, besides describing Eni's position regarding laws, integrity, and transparency. It entails obligations for suppliers to take action against modern slavery, child labour, discrimination in the workplace and for the protection of workers' rights in general.

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Communicating our commitment

Eni undertakes several initiatives aimed at raising awareness of Human Rights. In December 2018, for instance, ahead of the approval of Eni's Statement on respect for

Human Rights, Eni's CEO published a post on his blog regarding the paramount importance of Human Rights for Eni.

In October 2016 the CEO published a message on the same blog remarking the start of the training workshop for the company's top management entitled "Raising awareness on Business and Human Rights in Eni Activities". The CEO opened the event where leaders of international associations and organizations were invited to speak on the opportunities and challenges in the implementation of the Business and Human Rights framework. Both Eni's Board of Directors and Board of Statutory Auditors members attended the workshop, as well as management representatives (200 people in person and 200 via video link internationally). This open dialogue marked the start of our Business and Human Rights training program.

In 2018 the Human Rights section of Eni's website was reviewed with the aim of aligning it with the UNGP Reporting Framework.

Starting from 2017, continuing the process of financial and non-financial disclosure integration, Eni's Annual Report includes a specific section entitled "Consolidated Disclosure of Non-Financial Information" as provided for under Legislative Decree no. 254/2016. Such Information is complementary to the voluntary sustainability report³ that Eni has been publishing since 2006. All the reports are available on Eni's website.

HUMAN RIGHTS DUE DILIGENCE IN THE SUPPLY CHAIN

Eni is committed to carrying out Human Rights due diligence in its activities, including the management of the supply chain, starting from the preliminary phases. Conscious of the complexity of its business and of the challenges deriving from certain operating environments, Eni is engaged in a continuous effort to identify, prevent, mitigate and account for its potential and actual Human Rights impacts that it may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships. Within this framework, Eni considers respect for Human Rights at every stage of the relationship with suppliers, who are subject to a structured assessment designed to verify and monitor their compliance with the main ILO standards.

Assessing and managing risks

Eni has been developing and implementing different approaches and processes aimed at identifying impacts on Human Rights, in line with the UN Guiding Principles on Business and Human Rights.

Eni adopts criteria for the qualification and selection of

3. Both Consolidated Non-Financial Information and the sustainability report are in accordance with guidelines/standards issued by the Global Reporting Initiative.

suppliers in order to assess their ability to meet corporate standards on ethics, health, safety, environmental protection and Human Rights.

Eni performs processes aimed at minimizing Human Rights risks deriving from the conduct of its counterparties and continuously monitors compliance with these commitments.

Relating to Human Rights Assessment on suppliers, in 2018 Eni continued to adopt a risk-based model, which makes it possible to define an annual assessment plan for suppliers identified as “critical”, based on factors such as country risk and sector risk. The country risk factor consists of a ranking of countries that takes into account the geopolitical, cultural and legislative conditions according to the potential occurrence of Human Rights violations and was carried out using indexes published by Verisk Maplecroft and ITUC. The sector risk, on the other hand, takes into account the vulnerability of workers and the likelihood of the incidence of non-compliance with workers’ rights. In particular, the sector risk analyses and ranks sectors based on the incidence and type of low-skilled workforce as well as on the level of concern from international organizations for well-known criticalities.

Assessing supply chain risks through cross-functional Human Rights processes

Human Rights risks deriving from misconduct of Business Partners, including suppliers, fall within the scope of cross-functional Human Rights processes including **Human Rights Impact Assessments** and **Human Rights Compliance Assessments**.

A further initiative which confirmed the saliency of modern slavery risks was the Workshop held in 2017 to identify [Eni’s Human Rights salient issues](#). The event was among the first activities launched by the then newly established Eni Human Rights and Business Working Group.

With specific reference to the supply chain, the following issues were assessed as salient from the 26 Managers from 22 Functional Areas, which participated in the workshop facilitated by the Danish Institute for Human Rights:

- Modern slavery
- Migrant workers
- Freedom of association and Collective bargaining
- Working conditions (wages and working hours)
- Safe and healthy working conditions

A further key outcome of the Workshop was the identification of key enablers and barriers to addressing severe Human Rights impacts. Among them, it is worth mentioning the wide consensus on the challenge of increasing, and using the company’s leverage in different business relationships, and more specifically in relationships with governments, subcontractors and beyond first-tier suppliers. In 2018, this list of salient issues was shared with external stakeholders and prominent experts in the field of

Assessing and addressing Modern Slavery within cross-functional Human Rights Impact Assessments

In 2016 the Danish Institute for Human Rights (DIHR) carried out a Human Rights Impact Assessment on a project of [Eni in Myanmar](#) prior of its execution. Among a wide range of potential Human Rights issues, the assessment identified risks of forced labour and modern slavery, as well as other malpractices closely associated with such Human Rights breaches, including excessive working hours and salary payment delays. Particular attention was given to the most vulnerable workers, including temporary third party staff recruited by sub-contractors. While the DIHR team had been made aware that Eni includes wording and clauses in their procurement policies and procedures on labour and human rights, the assessment expressed concern over the implementation of such clauses by contractors to their sub-contractors and how this implementation could have been monitored in practice.

In order to ensure that those in charge of managing third party staff could rely on proper guidance on how to detect and address such risks, specific tools were developed among which a checklist for onshore seismic acquisition. The checklist included a number of necessary steps which the seismic contractor was required to undertake before, during and after the activities, when managing sub-contractors, engaging with communities and other stakeholders. In 2018, at the end of the activities, DIHR returned to conduct a follow up assessment, which confirmed that Eni Myanmar acted in accordance with DIHR recommendations, successfully implementing the mitigation measures and avoiding the risks.

Business and Human Rights, in order to gather their feedbacks and suggestions on the way Eni is handling the most relevant areas of attention on Human Rights.

Moreover, Human Rights issues are integrated into Eni’s Integrated Risk Management process, with metrics for social, environmental, health and safety impacts.

Eni achieved this goal by considering Human Rights in terms of both:

- risk events, provided that events related to possible Human Rights violations are considered in the Eni risks catalogue, which is periodically updated following the results of the Risk Assessment process;
- impact clusters related to Human Rights violations, which are included in the risk evaluation metrics in terms of social, environmental, health and safety, image and reputation impacts. Over recent years, Eni has worked at ensuring that all Human Rights (e.g. right to life, health, healthy working conditions, and free, prior and informed consultation) are integrated within the impact clusters so that each risk event is also evaluated in terms of Human Rights impact.

A further source of strategic information on Human Rights risks, including risks deriving from suppliers’ breaches of Eni’s Human Rights requirements, was the ISO 26000 independent assessments carried out in 15 Eni’s subsidiaries and/or districts between 2015 and 2018.

Finally, Human Rights issues potentially deriving from private security forces working for Eni, can also be identified through specific Risk Assessment tools developed and used by the Security function, starting with the Ethical Threat Assessment Process. This assessment

covers both broad Human Rights indicators and specific indexes, including issues such as Human Trafficking. The threat assessment activity is carried out for each country in which Eni operates. A detailed assessment is carried out on a regional basis for the most critical areas, in addition to the assessment of each country. A vulnerability assessment process that includes Human Rights issues is implemented at a single asset level. The extension and depth of this process are determined according to the risk-exposure of each asset.

Managing risks: embedding respect for Human Rights into the management of the supply chain and business relationships

Up to today Eni required suppliers to make a formal commitment to respect principles contained in Eni's Code of Ethics and in the "Eni Guidelines on the Protection and Promotion of Human Rights" which defined principles of reference regarding the protection and promotion of Human Rights when conducting business activities. Following the approval of "Eni's statement on respect for Human Rights", the document is progressively replacing the Guidelines as a contractually required standard of conduct. In addition, contracts signed by Eni with suppliers provide for Human Rights clauses and relevant sanctions in the event of non-compliance.

Eni carries out selection and management processes aimed at:

- analyzing the reliability of the operational and compliance levels of potential and actual suppliers;
- beyond assessing technical capacity, assessing also sustainability aspects and compliance with suppliers' HSEQ requirements, defining appropriate action plans geared to the development and continuous improvement of suppliers' performances and aimed at remedying any shortcomings identified;
- performing a gap analysis against the main international Human Rights standards by assessing them based on the evaluation parameters inspired by the Social Accountability Standard SA8000. Human Rights Assessments are especially aimed at understanding suppliers' strengths and weaknesses and increasing awareness on issues regarding workers' rights, such as minimum age of workers, prohibition of forced labour, prohibition of discrimination, safety and working conditions, freedom of association and rights to collective bargaining, working hours and remuneration.

This management model guarantees Eni's constant monitoring over its suppliers.

Should critical issues emerge, Eni requires the implementation of corrective actions. Where contractors' performance in terms of respect for Human Rights falls below minimum standards, Eni limits or prevents their participation in tender.

In 2018, Eni's headquarters assessed and monitored more than 5,000 suppliers (including but not limited to all the new suppliers that started a relationship with Eni)

on issues that include potential implications relating to respect for Human Rights; in particular, Eni carried out 20 Human Rights Assessments on suppliers.

Criticalities and/or areas of improvement have been detected on 1,008 suppliers, for 95 of which the result has been a negative evaluation, failure (i.e. not qualification), or brought to a provisional measure (monitoring, state of attention with clearance, suspension or revocation of qualification). The number of suppliers Eni terminated the relationship with is decreasing compared with previous years and reflects the lower number of wrongdoings revealed by investigations carried out throughout the year. The criticalities detected (resulting in requests to implement improvement plans) during the process of qualification or Human Rights assessment are linked to HSE issues or violations of Human Rights, such as health and safety, breach of code of ethics, corruption, eco-offences. All areas for improvement are currently being addressed.

As per the wider set of risks deriving from business relationships, Eni's Statement on respect for Human Rights states that the company commits, as far as possible, to ensure that the principles included in the Statement are integrated into the internal legal framework of the Joint Ventures in which it participates. In order to translate this principle into practice, following the approval of a set of guidelines (the so-called Golden Rules) Eni has introduced a new clause on Human Rights to be negotiated and applied to Joint Venture agreements and Petroleum Contracts.

Eni is committed to preventing the trade and exploitation of minerals that support, contribute to or are associated with regional conflicts and Human Rights violations. In 2014, we established a "Conflict Minerals Compliance Program" to review any use of Conflict Minerals in our products or in the manufacturing of our products. Further information are available on our website at the following [link](#).

Assessing effectiveness

Eni Managers in charge of activities that may generate Human Rights impacts have objectives linked to the integration of Human Rights into their processes and tools. These objectives can be assigned to Managers with various degrees of responsibility. As per the CEO's 2018 performance indicators, for instance, particular relevance has been given to the environmental sustainability and human capital objective, with an overall weight of 25% in terms of reduction of CO² emissions and the Severity Incident Rate (SIR). SIR measures the frequency of total injuries recordable over the number of hours worked, considering both employees and third parties' staff, assigning them increasing weights depending on the severity of the incident. The Sustainability Department is responsible for proposing and monitoring progress in such Management Objectives, including respect for Human Rights in the supply chain. Furthermore, the assignment of Management Objectives to the senior

management in charge of key departments proved to be a crucial trigger for the achievement of the HRBWG ambitious targets. As an example, Sustainability Management Objectives assigned to functional areas facing the most severe Human Rights challenges (Community Relations, Security, HR and Procurement) were focused on planning and delivery of in-depth Human Rights e-learning applied to the specific Human Rights standards and processes.

Furthermore, Eni is committed to continuously improving its monitoring and evaluation processes applied to Human Rights issues. Within this context, KPIs are used as a means to monitor Eni's efforts to prevent Human Rights violation, also in terms of Modern Slavery practices. For FY2018, relevant KPIs related to staff training, suppliers' audits performed, whistleblowing events and screening of the supply chain have been updated with a dedicated new set of KPIs specifically oriented to respect for Human Rights, which is available in the 2018 Annual Report.

Training, awareness raising and capacity building

Training plays a fundamental role in Eni's Human Rights Due Diligence and the company has progressively increased its efforts aimed at communicating its expectations in terms of respect for international standards, in its business and in the supply chain. Over the last years, Eni has developed a wide range of training courses on Business and Human Rights, differing in terms of format and content, in order to offer our colleagues and Business Partners the learning opportunities that best suit their needs.

In order to reach all Eni employees and Managers with access to training on Business and Human Rights, in 2016 Eni launched a massive e-learning program on the companies' responsibilities to respect Human Rights. The program greatly benefited from the technical expertise provided by the Danish Institute for Human Rights. So far, more than 24,000 people from staff to middle and top managers have participated in these remote courses. Following the first module on general issues, in 2017 Eni developed courses focusing on specific issues and functional areas. As per Eni workers and third party staff, in 2018 Human Resources people and all Eni Managers were invited to attend an e-learning focused on the companies' responsibilities in terms of respect for workers' rights and third party staff. The e-learning focused on ILO standards relevant to Eni's salient Human Rights issues, including forced labour and the rights of migrant workers, who are particularly exposed to modern slavery risks.

Moreover, the resources of the procurement department have been progressively engaged in initiatives aimed at boosting their capacity to address Human Rights issues and raise awareness on the responsibilities of their work in terms of prevention and mitigation of Human Rights impacts.

In 2018 a module dedicated to Human Rights risks in the supply chain was also finalized, in order to be launched

in 2019 to Eni's Procurement professionals. The module includes two case studies: 1) the first one addresses the topics of working conditions, working hours and vulnerable workers; 2) the second one is focused on modern slavery practices such as wage deductions and passport retentions. Both case studies terminate with a description of Eni's expectations in terms of both remedy for abused workers and approach with the supplier. The training also addresses key topics and dilemmas such as:

- unintentional effects deriving from common business practices such as exerting pressure on delivery deadlines, potentially leading to workers' rights abuses on working hours;
- challenges deriving from local content requirements in Petroleum Contracts which, under certain conditions, might lead to severe problems in finding suppliers whose standards are in line with international conventions.

Furthermore, in order to develop in-house expertise on Human Rights Assessments, every year people from the procurement departments of the headquarters and foreign affiliates participate in SA8000 Auditor courses. Thanks to this professional training aimed at developing in-house expertise on Human Rights Assessments, a total of 44 staff from the procurement departments of headquarters and foreign affiliates have achieved their certification since 2008, including three in 2018.

Similar to the Business and Human Rights courses, training on the Code of Ethics (including Human Rights and Modern Slavery issues) is also tailored to the level of risk exposure associated with each worker's role and responsibility within the organization. The same training opportunities are offered to the members of the Board of Directors of Eni's controlled companies, together with the Top Management of Eni's subsidiaries. As per Eni's Board of Directors, newly appointed members are engaged in Leadership Meetings focused on the Code of Ethics. The meetings also take place at every Board renewal.

Regarding awareness raising initiatives, during the Vendor Management Day held in June 2017 procurement managers were sensitized to the relevance of sustainability and Human Rights in the supply chain.

Finally, negotiators have been trained on the content of the new Human Rights clause for Petroleum Contracts and Joint Venture agreements as well as on the main Human Rights standards. An ad hoc webinar was held in November 2018 whereby all the upstream negotiators, commercial managers and managing directors have actively participated. In addition, a technical guide was provided immediately following the webinar to all the upstream negotiators so that they become more acquainted with Human Rights principles and guidelines.

As for suppliers, Eni has undertaken a range of initiatives aimed at communicating its commitment to respecting

Human Rights and raising awareness on this issue and its implications. For instance, during the Safety Day dedicated to contractors - involving around 160 suppliers operating in the various commodity classes Eni considers most critical in terms of safety - rewards are assigned to suppliers who stand out for their commitment and have achieved the best safety performance.

Another of Eni's relevant initiatives concerning the supply chain is the Program on Human Rights and Security, which has been delivered to public Security forces and Security specialists. The above-mentioned Program has been running since 2009 with the participation of Security provider, in Italy and globally, and will continue to involve Countries in which Eni operates. Training sessions have been held in Tunisia (2018), Nigeria (2017), Venezuela and Ecuador (2016), Kenya (2015), Mozambique (2014), Indonesia and Algeria (2013), the Republic of Congo and Angola (2012), Pakistan and Iraq (2011), Egypt and Nigeria (2010) and in Eni's offices in Rome and San Donato Milanese (2009 and 2013).

Finally, participation in IPIECA's Task Force dedicated to labor rights assessment with a focus on contracted workforce was a unique opportunity to build a common understanding of critical issues and dilemmas and sharing lessons learned. In 2018 this activity led to the creation of a toolkit, shared with the association's working group dedicated to the supply chain, addressing the best practices to follow when assessing Labour Rights in the supply chain.

Details on Eni's Human Rights training program are available on the dedicated [page](#) of Eni's website.

GRIEVANCE MECHANISMS

All of Eni's people, stakeholders and other third parties, including contractors and suppliers' employees, can report any wrongdoing which extends to Human Rights violations, including modern slavery, as described in the internal regulation "[Whistleblowing Reports received \(including anonymously\) by Eni SpA and its subsidiaries in Italy and abroad](#)", in full confidence and without fear of retaliation. All the whistleblowing reports received are fully investigated and disclosed with the related appropriate remedial actions taken. Annual information about whistleblowing reports received and actions taken is published in the annual report "Eni for Performance". As per 2018, no reports on modern slavery were received.

Moreover, we have defined operational-level **Grievance Mechanisms** based on a proactive and structured approach to receive, recognize, investigate, respond and resolve complaints from individuals or groups of individuals in a timely, planned and respectful manner. The Grievan-

ce Mechanism makes it possible to manage risks and foster a positive relationship with stakeholders. Details are available at the following [link](#).

MULTI-STAKEHOLDER ENGAGEMENT

Engagement with representatives of rights-holders is an essential activity of our Human Rights approach. The annual meeting with the IndustriALL Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL trade unions envisaged within the GFA, for example, is a key opportunity to share information on Eni's performance, actions and plans concerning HSE and Sustainability (including main HSE indexes related to employees and contractors), reports or grievances relating to Human Rights issues (if any) and positive actions in favor of non-discrimination. The annual meeting took place in Montreux in December 2018.

Furthermore, Eni builds long-term relationships with renowned Human Rights experts and organizations in order to reach multiple goals ranging from undertaking joint actions to improving its understanding of cutting edge topics, from contributing to the debate on Business and Human Rights to exchanging lessons learned and best practices.

An example of the paramount importance of multi-stakeholder engagement is given by the consultations we organized during the identification process of Eni's Human Rights salient issues and while drafting Eni's Statement on Business and Human Rights. Key Eni stakeholders including IndustriALL, the Institute for Human Rights and Business, the Danish institute for Human Rights, UNICEF and AVSI provided us with authoritative inputs we integrated into the salient issues and the Statement.

In the 2018 UN Annual Forum on Business and Human Rights, Eni presented the lessons learned in performing a Human Rights Impact Assessment in Myanmar between 2016 and 2018, in collaboration with the Danish Institute for Human Rights (DIHR). In 2018 Eni also participated in the engagement process organized by Corporate and Human Rights Benchmark and was assessed as the best performing Oil&Gas company.

Moreover, Eni is a member of the UN Global Compact, IPIECA and the World Business Council for Sustainable Development.

Finally, Eni has been cooperating with the Danish Institute for Human Rights (DIHR) since 2008. The partnership encompasses a wide range of activities, from support on how to structure Eni's Human Rights Due Diligence process to projects focused on specific operating sites, including Human Rights compliance and impact assessments.

NEXT STEPS

In 2019 Eni is committed to publishing the new Suppliers' Code of Conduct. Suppliers will be required to commit to the principles stated therein and failure to comply may result in the interruption of the business relationship. Moreover, in order to raise awareness on Human Rights issues, after involving all its Procurement professionals

in a training course on Human Rights risks in the supply chain in 2020 Eni plans to deliver the module to everyone who manages contracts with third parties (the so-called contract holders) since they might be the critical triggers for detecting Human Rights risks and impacts.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors of Eni S.p.A., 24th April 2019.



Claudio Descalzi
CEO ENI SpA

Date: 24 April 2019