



SLAVERY AND HUMAN

TRAFFICKING STATEMENT 2021



# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

## INTRODUCTION

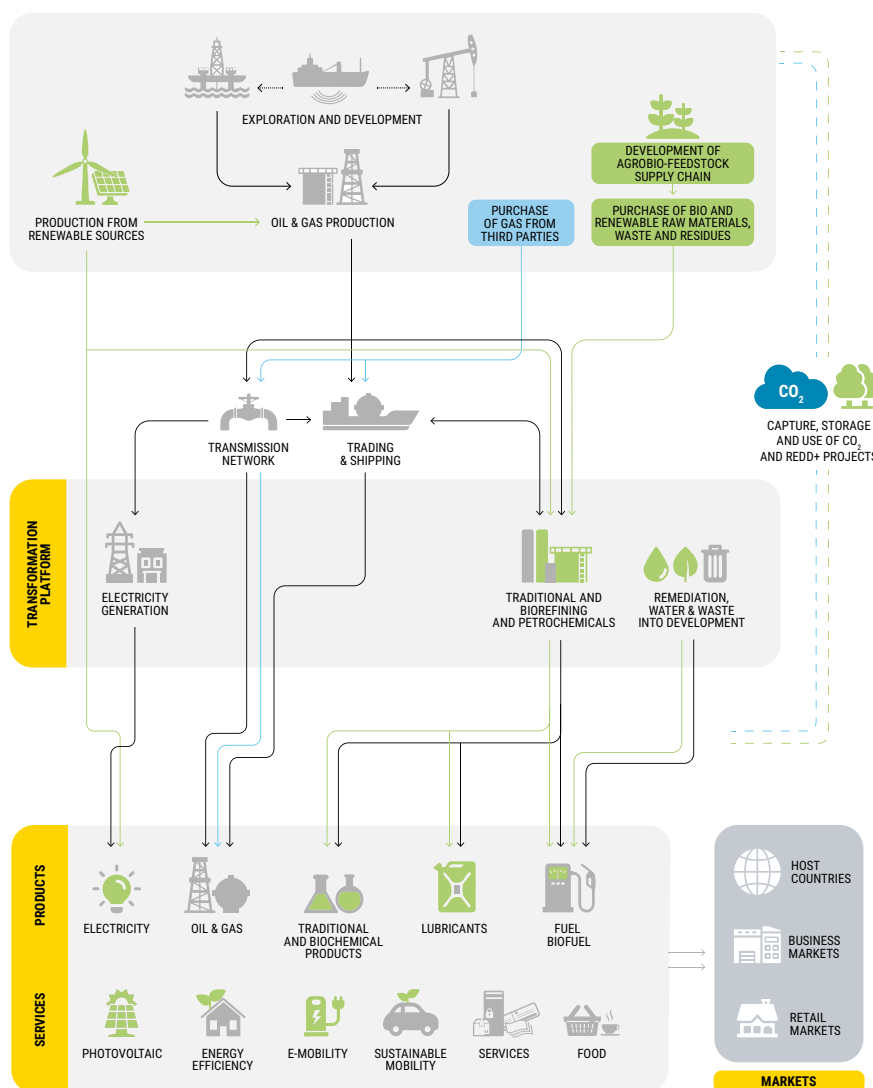
Eni's approach to human rights, including to the prevention of modern slavery, builds on the dignity of every human being and on the companies' responsibility to contribute to the well-being of individuals and communities surrounding its business activities. This vision goes beyond obtaining a social license to operate, it is an integral part of Eni's identity and its way of doing business.

## ENI'S BUSINESS AND SUPPLY CHAIN

*Eni is an energy company. We concretely support a just energy transition, with the objective of preserving our planet and promoting an efficient and sustainable access to energy for all. Our work is based on passion and innovation, on our unique strengths and skills, on the equal dignity of each person, recognizing diversity as a key value for human development, on the responsibility, integrity and transparency of our actions. We believe in the value of long term partnerships with the countries and communities where we operate, bringing long-lasting prosperity for all.*

Eni is a global energy company with a high technological content, engaged in the entire value chain: from the exploration of oil and natural gas, to the generation of electricity from cogeneration and renewable sources, traditional and biorefining and chemicals, and the development of circular economy processes. Eni extends its reach to end markets, selling gas, electricity and products to local markets and to retail and business customers to whom also offers services of energy efficiency and sustainable mobility. Both CO<sub>2</sub> capture and storage and Natural Climate Solutions initiatives will be implemented to absorb residual emissions.

Indeed, Eni believes that business must respect internationally recognized human rights, as established in the UN Guiding Principles on Business and Human Rights (UNGPs). 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 Partners<sup>1</sup> to respect human rights. Eni has zero tolerance towards such human rights violations and expect its supply chain to comply accordingly.

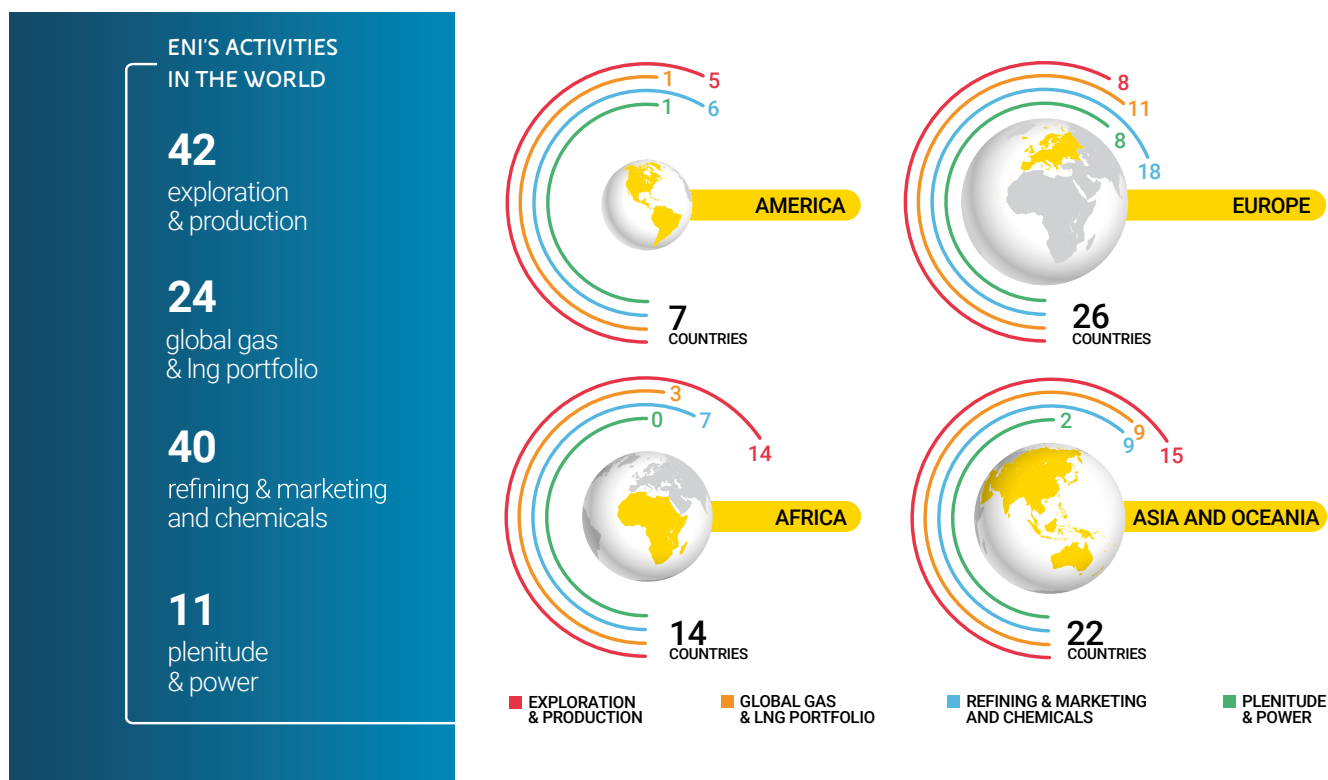


1. Any third party, non-employee providing products or services for Eni or any third party that acts on behalf of or for Eni's interest.

Consolidated expertise, technologies and geographical distribution of assets are Eni levers to strengthen its presence along the value chain. Eni's business and operating model is described in detail

in the [Annual Report](#).

Eni employs more than 32,000 people in 69 Countries around the world.

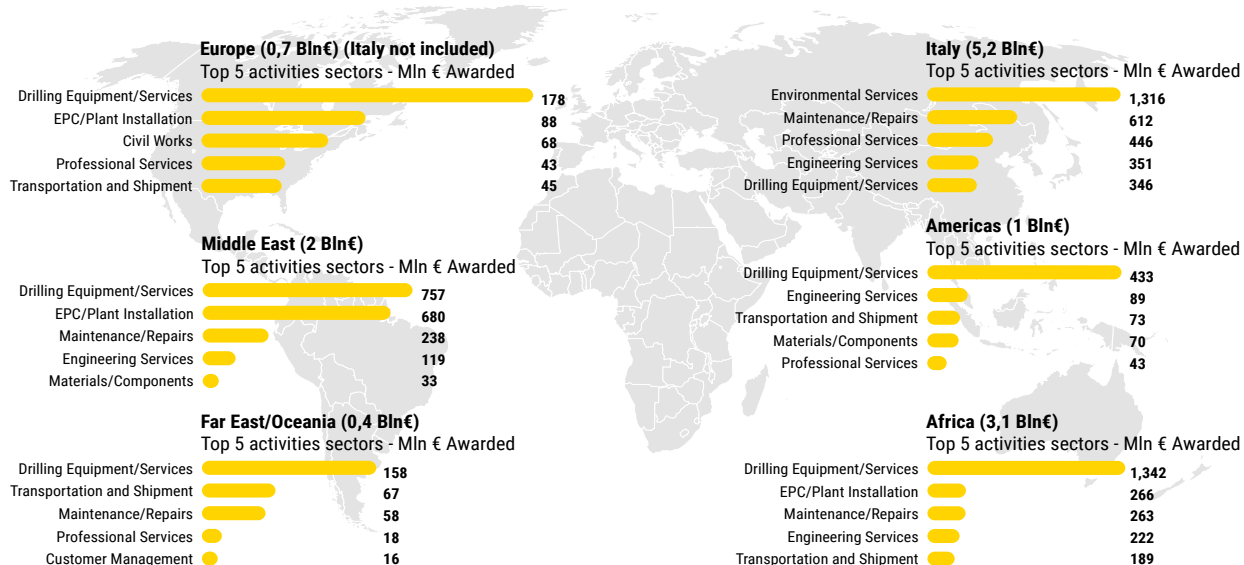


### Eni's supply chain

Eni's operations are supported by a global supply chain that includes suppliers of goods, works and service from all over the world. The procurement expenditure in the

Natural Resources, Energy Evolution and Support Function business areas was approximately of 12,4 billion € in 2021, with 19,150 contracts awarded by its 40 procurement departments around the world.

### Contracts awarded in 2021 - by geographical area



## HUMAN RIGHTS POLICIES AND GOVERNANCE

### 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.

On December 23rd 2020, Eni's Board of Directors decided to adopt the new Italian Corporate Governance Code 2020, effective starting from January 1st 2021, which identifies "sustainable success" as the objective that must guide the action of the management body and which takes the form of creating long-term value for shareholders, taking into account the interests of other relevant stakeholders. However, Eni has been considering the interest of stakeholders other than shareholders as one of the necessary elements Directors must evaluate in making informed decisions since 2006.

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

The Board also approves the most important internal ru-

les, including the Code of Ethics, 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;
- 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.

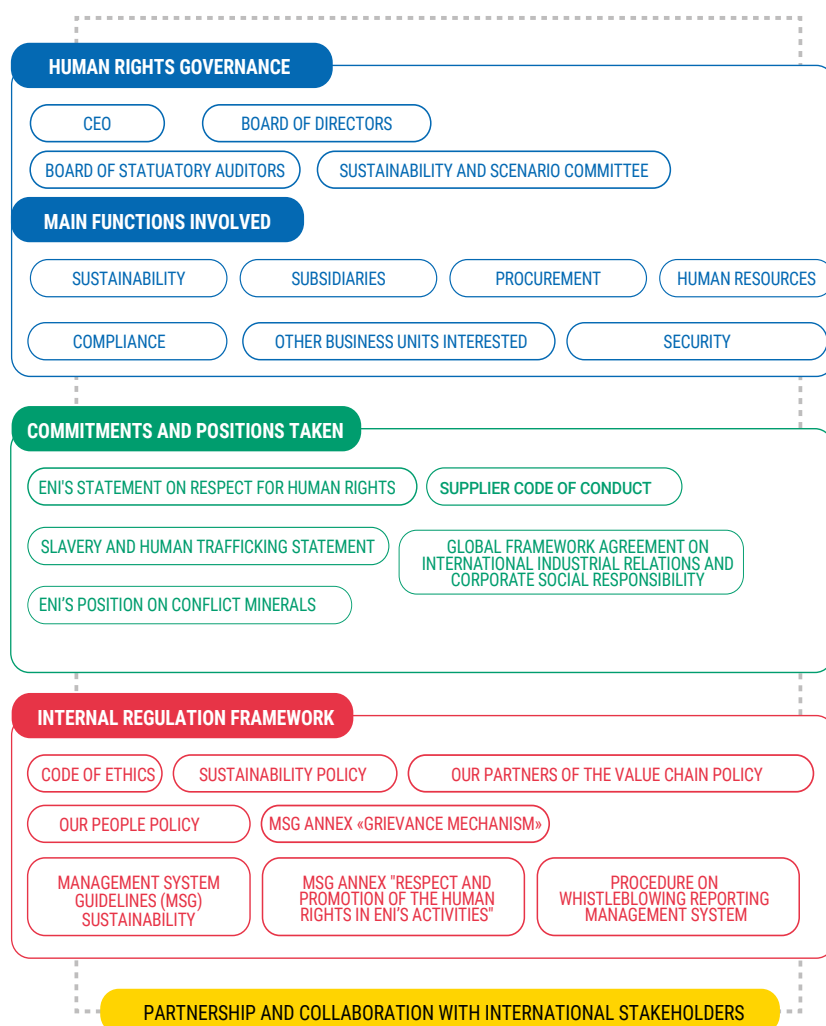
The Board of Directors is also responsible for defining the risk profile, both in terms of nature and level of risks in a manner consistent with the company's strategic objectives, including all risks that could affect the medium-to-long-term sustainability of the business.

With reference to Eni "top risks" - according to the Integrated Risk Management (IRM) model adopted - as well as main risks or issues otherwise detected during the IRM processes, the results of the quarterly assessment/monitoring activities performed by IRM on such risks, along with treatment actions, are timely reported to the Board of Directors and control bodies (e.g. the Control and Risk Committee) in order to support corporate decision-making process. Human rights issues, even those related to supply chain, are included to the extent a potential violation is detected when assessing the above risks and measuring their impacts.

The Sustainability and Scenarios Committee, within the Board, has the responsibility to advise the Board on scenarios and sustainability issues, including recommendations on human rights issues.

The Sustainability function oversees day-to-day overall approach of Eni to human rights and supports Eni's business/staff functions to ensure respect for human rights within their processes. Indeed, the salient human rights issues identified by Eni according to its due diligence process are clustered into 4 focus areas, each of them owned by a specific function.

One of these focus areas is dedicated to the relationship with business partners along the supply chain. 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.



## Policies and rules on human rights

Eni's work is guided by the values and principles described in the Code of Ethics, in the Eni's Statement on respect for human rights, in the Suppliers Code of Conduct, in "Our Sustainability", "Our people", "Our partners of the value chain" and "The integrity in our operations" policies, referred to Eni's activities and supply chain.

The [Code of Ethics](#) sets out the main values that guide Eni's actions and contains effective rules of behaviour, so that the principles contained therein form a practical guide for corporate operations. The Code of Ethics provides for the refusal of all forms of forced and/or child labour and enunciates Eni's commitment to defining and disseminating policies, standards and rules that guide the action of its suppliers and partners towards the respect for human rights and its principles of sustainability. The Code of Ethics is part of the "General framework of regulatory system", which inspires the provisions contained in Eni's regulatory instruments and also inspires the model of organization, management and control. The Code of Ethics applies to all direct or indirect subsidiaries, both in Italy and abroad, and to all Eni's stakeholders. The Code was significantly updated on March 18<sup>th</sup> 2020.

[Eni's Statement on respect for human rights](#), approved in December 2018 by the Board of Directors, mirrors the requirements set out in the UNGPs 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. 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.

Besides, a new internal procedure annexed to the internal Management System Guideline "Responsible and sustainable enterprise", named "Respect and promotion of human rights in Eni's activities", was delivered on March 2020. This document regulates internally how to perform human rights due diligence and provides a concrete approach to the commitment expressed in the Eni's Statement on respect for human rights.

Moreover, the [Global Framework Agreement](#) on International Industrial Relations and Corporate Social Responsibility (GFA), renewed by Eni, the IndustriALL<sup>2</sup> Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL<sup>3</sup> trade unions in June 2019 includes specific provisions regarding the international standards contract clauses must explicitly refer to, as well as requirements for qualifying suppliers and subcontractors. The Parties of the Agreement annually meet to share information on the implementation of the GFA and potential sustainabi-

lity and human rights issues.

Finally, the [Suppliers' Code of Conduct](#) sets Eni's expectations on suppliers regarding compliance to internationally recognized human rights standards and describes 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.

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, the UNGPs and the OECD Guidelines for Multinational Enterprises.

## HUMAN RIGHTS DUE DILIGENCE AND RISK ASSESSMENT

Eni's approach to human rights due diligence was established by the above-mentioned internal procedure "Respect and Promotion of the Human Rights in Eni's Activities", issued in March 2020 as part of the Management System Guidelines of Eni. This procedure represents a fundamental framework for all the people involved in preventing human rights violations and managing human rights issues; the due diligence is set on an iterative (not once-off) process, context-specific and covers the entire spectrum of human rights implications for Eni.

The human rights due diligence model adopted by Eni in line with the UNGPs and designed to be multidisciplinary, multilevel and integrated at any level of the company's processes, follows a risk-based approach with the aim of identifying, preventing, mitigating and accounting for adverse corporate impacts on human rights. The risks identified through the due diligence are defined as risks to rights-holders, therefore extending the traditional company's risk management perspective.

Eni has been developing and implementing different approaches and processes aimed at identifying impacts on human rights, especially ones linked with the workforce management – direct and indirect (in supply chain), such as modern slavery and human trafficking.

Finally, risks of potential human rights violations are mapped also by the "Integrated Country Risk" (ICR), included the modern slavery, whose purpose is to offer an integrated analysis of risks existing in Countries of either presence or interest for the company. To evaluate the human rights risks of the Countries is used a third-party provider (Verisk Maplecroft).

## Assessing and managing risks related to direct workforce

Eni is aware that in some Countries of operations relevant risks related to human rights violations can be detected, included modern slavery. Conscious of this, Eni has in place an articulated framework of policies, mana-

2. Organization that represents more than 50 million workers distributed in 140 Countries, in the energy, manufacturing and mining sectors

3. Main Italian trade union organizations

gement models, contractual clauses and practices to be adopted by Eni's subsidiaries - in line with the commitments undertaken by the parent company in the Code of Ethics and in the Eni's Statement for the respect of human rights – which allow to effectively manage these risks in direct workforce management.

In 2020, an evaluation model has been set up in order to assess human rights in the workplace. It is a "risk-based" model, which segments Eni subsidiaries according to specific quantitative and qualitative parameters aimed at outlining the issues and risks of the country/operating context that are linked to the human resources management process, including contrasting all forms of discrimination, gender equality, working conditions, freedom of association and collective bargaining. This approach identifies possible risk of improvements, requiring specific actions to be defined and monitored over time.

During 2021, the model was extended to all subsidiaries of the upstream business, expanding the assessment of human rights monitoring in the workplace.

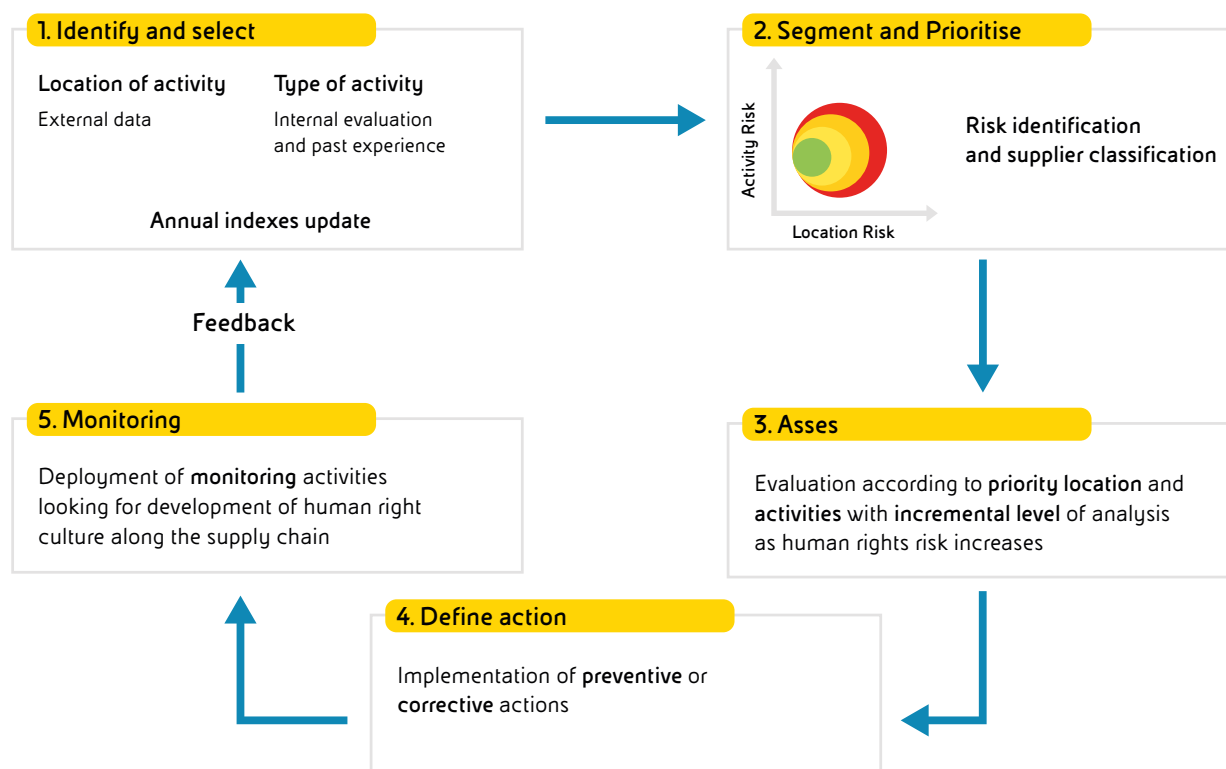
### Assessing and managing risks along the supply chain

In 2021 Eni has applied the risk-based model for assessing and managing the human rights risk along the supply chain: suppliers are monitored and assessed all over the procurement process, from suppliers' self-candidacy evaluation, qualification evaluation, tender phase to post award stage, in order to promote and guarantee the respect of human rights by excluding any form of slavery, forced labour, child labour and encourage healthy and

safe working conditions, freedom of association, and adequate wages.

To manage these risks, the model allows differentiated control approaches according to the different risk levels, always inspired by international standards such as SA8000: all suppliers are evaluated on respecting human rights with a growing level of detail according to the associated risk degree. Through the acceptance of the Code of Conduct, suppliers are required to comply with Eni's principles and policies on human rights in order to become or maintain the status of Eni's supplier; it represents a mutual commitment in recognizing and protecting the value of all its own people, operate with integrity, protect company resources, promoting the adoption of such principles in their own people and their supply chain. Moreover, all suppliers are subject to a continuous monitoring process through: i) due diligence verifications ii) reinforced feedback processes with focus analysis on respecting human rights; iii) periodic check-points with dedicated questionnaires - during the qualification stage: in 2021 Eni has reached the target of more than 6,000 suppliers assessed on social responsibility, included the respect of human rights, with the aim of prevent the risk of engage suppliers unable to guarantee the respect of human rights. According to the risk-based model, in depth evaluations on 24 suppliers and 11 audit according to SA8000 principles have been further performed; iv) on field-surveys - during the execution of the contract, according to reinforced requirements and clauses on the protection of human rights in all contractual standards.

### Eni's approach to assess and manage risks along the supply chain



In contract execution phase more than 2,000 feedback questionnaires have been evaluated with 60 of them related to potential violation of human rights. The in-depth assessment revealed that **none of them were related to modern slavery issues.**

In the tender evaluation process, as the human rights risk increases, minimum requirements are adopted, evaluated and monitored along the contract duration not only for contractors but also for Eni's subcontractors with the aim of preventing any forms of modern slavery such as forced labour, child labour, discrimination or unequal wages. Should any critical issues arise, suppliers are requested to implement improvement actions or, if they don't meet the minimum standards of acceptability, they are inhibited to participate in tenders or operate under a contract and consequently excluded from Eni vendor lists. According to the risk-based model, evaluation and monitoring of suppliers' performance in terms of respect of human rights can be performed with on-site audits or, when it is not possible, by a virtual audit. The result is a comprehensive approach for risk identification, prevention, and mitigation in every stage of the procurement process, from the supplier selection to the tender evaluation and performance monitoring along the entire supply chain.

Eni has continued to improve and strengthen the attention to the respect of human rights by ensuring risk-based evaluation with focus on the riskiest geographical areas in which Eni operates (the countries with the highest number of suppliers at risk are Nigeria, Congo and Mozambique).

In 2021, with a systemic approach, Eni has launched concrete initiatives and tools for boosting the competitiveness of the supply chains, with the aim of promoting a fair and sustainable energy transition along the chain and supporting suppliers in respecting the values of environmental protection, economic development, social growth and human rights respect.

Eni has shared its own resources and competences in

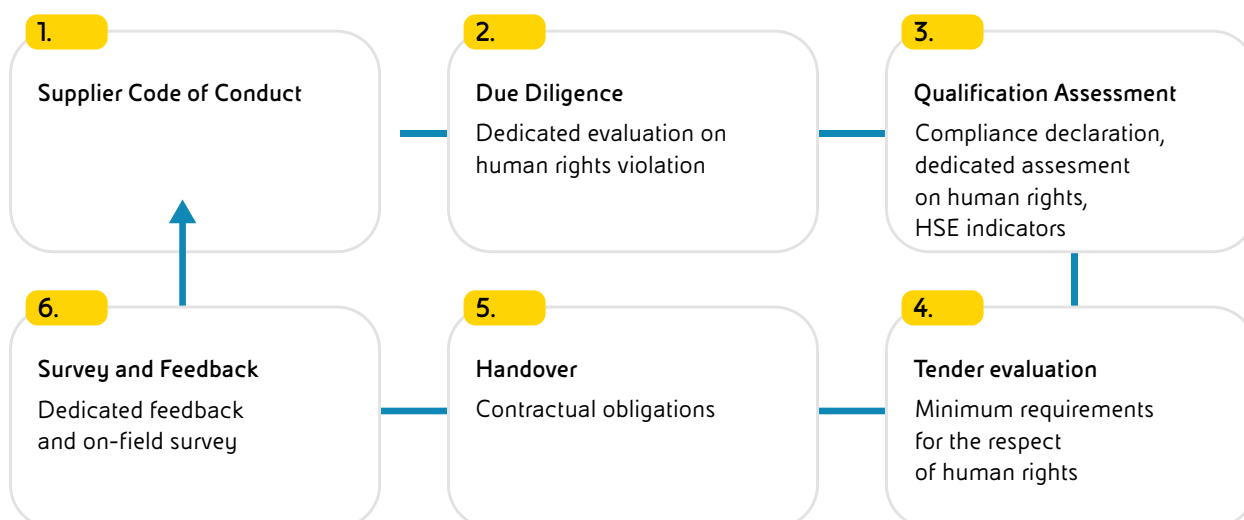
order to build a new digital platform (Open-es), open to all players, for measure the sustainable position, accompany companies, especially small ones, along a path of increasing ESG performance. All suppliers will be requested to collaborate, self-evaluate and improve themselves according to the four dimensions of Stakeholder Capitalism Metrics (people, prosperity, principle of governance and planet) with a specific section dedicated to measure competences in managing and mitigate human rights risks such as child labor and forced labor. Moreover, it allows to map risk and opportunities, define priorities, obtain customized improvement plans, draw up the sustainability report and get the support of experts on the Open-es development Hub, where specific services are provided in order to support company growth along the path. More than 3,000 companies from 75 countries and 60 markets are on board on Open-es for sharing their data and improve their sustainability performance.

Eni subscribed a Memorandum of Understanding with Elite and Illimity Bank with the aim to make available to all the firms operating along the energy supply chain the "Basket Bond Sustainable Energy" program, an innovative financial solution. Eligible companies will have access to financial resources - according to their current and expected sustainable profile - for projects and investments suitable to achieve one or more United Nations Sustainable Development Goals, with a specific focus on Environmental, Economic and Social aspects, included the promotion of the human rights respect.

Awareness initiatives, both external and internal, have been promoted in order to improve ESG culture, under a human rights perspective: several meetings with experts on Open-es platform for concrete experiences and possible approaches (such as sustainability report) or with local industrial associations were arranged.

All procurement resources, in Italy and abroad, received a dedicated training on the human rights evaluation model above mentioned.

#### Control measures to ensure respect for human rights in the procurement process





### Assessing and managing risks with security providers

The human rights issues potentially deriving from private security forces working for Eni, modern slavery included, are assessed by a risk-model updated in 2021. The model considers specific parameters, that are split into two clusters based on “Context elements” and “Eni’s presence in the area”. In the first group there are Security Country Threat parameter and Human Rights Risk parameter (the risk of human rights is a component of the ethical threat). Both the Security Country Threat and Human Rights Risk are given by an external provider. In this first cluster there is also a new index, named “Security Forces and Human Rights”<sup>4</sup>, that measures the risk of business complicity in human rights violation committed by private and/or public security forces. The index measures the effectiveness of state security forces as well as the involvement of both State and private security forces in human rights violations. The assessment allows to identify possible negative impacts and address them: the “Security & Human Rights” action plan is set according to the results of the risk assessment and it includes, among other, actions like sampling the supervisory contracts in place in the first 10 Countries resulting from the risk-based model, in order to verify the presence of human rights clauses, and the realization of the training and information workshop on “Security & Human Rights”. In 2021, such workshop was held in Mexico.

### Assessing and managing risks in industrial projects

In relation to business projects carried out by Eni, in 2018 the company has adopted a risk-based model which classifies upstream projects according to their potential human rights risks. The model takes into consideration a mix of parameters connected to the operating context, the Countries hosting the activities and the project characteristics, to identify appropriate management measures to prevent and mitigate possible specific impacts. Higher-risk projects are specifically investigated through a “Human Rights Impact Assessment” (HRIA) or a “Human Rights Risk Analysis” (HRRRA) – the latter carried out according to a desk-based analysis methodology developed in 2021 – to identify measures to prevent potential impacts on human rights and manage the existing ones. In 2021, these investigations were conducted for the seismic acquisition projects planned in Cabinda Centro in Angola, on Block 47 in Oman, on Dumre Block in Albania; on Area C of the Sharjah Emirate (UAE). Several recommendations have been identified for each project to prevent and mitigate the potential negative impacts, set out in specific Action Plans to be implemented in 2022. The Action Plans adopted also include several actions to prevent any risk of modern slavery, among others: a reinforced labour rights requirements have been added in the contracts with the suppliers providing main services, new on field checks, audits, and monitoring activities.

## ASSESSING EFFECTIVENESS

Eni is committed to continuously improving its monitoring and evaluation processes applied to human rights issues. Within this context, KPIs are used to monitor the effectiveness Eni’s efforts to prevent human rights violations, also in terms of modern slavery practices. In 2021, relevant KPIs related to staff training, suppliers’ assessments, criticalities and eventual human rights violations, as well as whistleblowing events have been monitored in continuity with the previous years and drive Eni’s actions to improve. Data and figures about the performances are available in the 2021 Annual Report, in the Sustainability Report “Eni For a Just Transition 2021” and in the Report “Eni For Human Rights”.

The monitoring of these KPIs drives Eni’s actions to improve and allows to set annually specific targets, which are embedded in the objectives assigned to the management in charge of the processes more at risk in terms of human rights impacts. The Sustainability Department is responsible for proposing and monitoring progress in such Management Objectives, including respect for human rights in the supply chain.

The internal audit program as well is very relevant to assess the effectiveness of the internal regulation and its application on human rights.

Periodically, at least once a year, the approach towards modern slavery and broadly on human rights is reported to the Sustainability and Scenario Committee.

## TRAINING AND AWARENESS

Eni considers training and awareness-raising activities dedicated to its employees and Business Partners a key element of its commitment to respecting human rights. Eni wants to ensure that every employee is aware of the importance that the Company places on human rights. 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, to offer Eni’s employees and Business Partners the learning opportunities that best suit their needs.

Eni’s training on Business and Human Rights is organized in a diversified strategy along four lines:

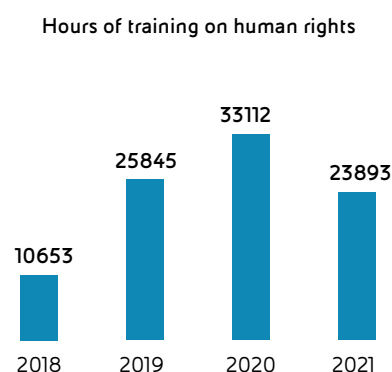
1. General courses on Business and Human Rights for all Eni people
2. Specific courses on topics and areas particularly exposed to risks of negative impacts
3. Training initiatives on issues closely linked with human rights (e.g. Code of Ethics, HSE, etc.)
4. Training courses on Security and Human Rights

This year, almost 24,000 hours of training were provided among staff and middle and top managers on human rights program.

In 2019 a specific training module on human rights risks



along the supply chain was launched addressed to Eni's Procurement professionals and this target has been progressively extended in 2020 and in 2021. Participants were trained on modules shaped on 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.

Another initiative concerning the services providers is the Training 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 15 Countries hitherto.

Finally, in 2021 Eni collaborated with IPIECA and Building Responsibly Initiative to develop and review a training course for contractors and suppliers on labour rights, included modern slavery risks, associated with the construction of large projects. The training course was developed in partnership with Ergon, a specialist labour rights consultancy, with the aim to build up contractor capability and support them in addressing labour rights issues. The training has a modular approach focusing on core issues, among others freedom of association, fair recruitment, decent wages, working hours, and the availability of effective worker grievance mechanisms.

## WHISTLEBLOWING AND 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 Eni's Annual Report, in "Eni for Performance" and on the website<sup>5</sup>. As per 2021, no whistleblowing reports on modern slavery were received and confirmed. Moreover, an operational-level Grievance Mechanism is defined 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 Grievance Mechanism makes it possible to manage risks and foster a positive relationship with stakeholders, as well as provide remediation in case of non-compliance. No grievances were received in 2021 referring to modern slavery. Details are available in "Eni For Human Rights".

## MULTI-STAKEHOLDER INITIATIVES

Engagement with representatives of rights-holders is an essential activity of Eni's 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.

Furthermore, Eni builds long-term relationships with renowned human rights experts and organizations 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.

In 2020, Eni was admitted as an "Engaged Corporate Participant" to the Voluntary Principles on Security & Human Rights (VPI), a multi-stakeholder initiative dedicated to ensuring human rights in security operations. In February 2021, Eni prepared its first Annual Report and in May it gave a Verification Presentation to the Secretariat of the Voluntary Principles in which companies, NGOs and Governments took part. Eni's membership of the VPI further strengthens the company's commitment to working with institutions to affirm respect for fundamental human rights principles in managing the required security operations.

Moreover, Eni is an active member of the IPIECA's<sup>6</sup> Social Responsibility Group, Human Rights Working Group (HWG) and Supply Chain Working Group (SCWG), where most relevant issues for the industry are discussed and guidance are elaborated. In 2021, such activities were mostly focused in preparing the guidance "Labour rights risk identification in the supply chain"<sup>7</sup> and its related operating tool, as well as the training platform for suppliers and

4. This new indicator is provided by the database of Verisk Maplecroft, a leading research firm specialising in global risk analytics, country risk insight & trusted advisory.

5. [www.eni.com/en-IT/about-us/governance/notifications.htm](http://www.eni.com/en-IT/about-us/governance/notifications.htm)

6. Association of sustainability on environmental and social issues in the Oil & Gas sector

7. <https://www.ipieca.org/resources/good-practice/labour-rights-risk-identification-in-the-supply-chain/>

contractors described in the previous paragraph. Finally, Eni is a member of the UN Global Compact, and the World Business Council for Sustainable Development and actively takes part to workstreams on labour related topics.

## CONSULTATION

Eni's organizational and business structure is highly integrated in terms of its policies and processes, which stem from Eni S.p.A. and are applied across the Eni Group. All Eni Group subsidiaries, including but not limited to those falling within the scope of application of the relevant slavery statement laws, adopt Eni's main policies, including the present Modern Slavery Statement. The Board of Directors of each subsidiary adopts this Statement and publishes it on its website, if available, or maintains it on file to respond to any requests from interested stakeholders.

Efforts to prevent slavery risks within and around the company similarly consist of an integrated process involving the collaborative work of various specialised units and departments. These include the following functions: Sustainability, Compliance, Internal Audit, Procurement, Risk Management Integrated, Human Resources, Governance, Security, Eni Corporate University (ECU). Each of these units and departments was involved – under the lead of the Sustainability Function – in the preparation and drafting of this Statement to ensure that the document reflects accurate and updated information.

Moreover, the human rights due diligence model adopted by Eni S.p.A. at the central level and managed by the Sustainability Function, operates through integrated information flows from internal functions and Group's subsidiaries to the Sustainability Function. This includes, for instance, the involvement of the Internal Audit Function in the quarterly analysis of whistleblowing reports received concerning human rights and the evaluation - in consultation with the subsidiaries - of potential remedial measures, the analysis carried out by the procurement function of any potential risks identified in the activities carried out by suppliers and the evaluation - also with the support of the subsidiaries - of remedial measures. Another example is the collaborative work of various functions, including Negotiations and the subsidiaries, to include standard human rights clauses in Joint Operating Agreements and Petroleum Contracts, which requi-

re among other things that all Parties to such agreements avoid/prevent child labour, forced labour and slavery practices as well as ensure decent work conditions and labour rights.

## MOVING AHEAD

In 2022 Eni will take further important steps to spread and consolidate a culture of respect for human rights, by strengthening the effectiveness of the risk-based Human Rights Models in the supply chain in Italy and abroad, and management actions related to. In particular, dedicated awareness activities will be implemented for high-risk suppliers and strategic suppliers leveraging on a systemic approach.

From a compliance perspective, Eni is taking note of legislative developments occurring at both national and regional EU level in relation to corporate sustainability and human rights due diligence. The latest proposal from the European Commission, published on 23 February 2022, for a Directive on Corporate Sustainability Due Diligence, once adopted, will lead to standardised human rights obligations across the continent and beyond. Eni has long been structuring and implementing human rights processes in line with international standards and best practices, with a particular focus on the United Nations Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises, from which the European Commission's Proposal draws inspiration. Eni has therefore been laying the groundwork to further strengthen such processes in anticipation of any new applicable laws that will be adopted on business and human rights.

Moreover, Eni's training plan will be implemented to continue promoting shared knowledge on human rights and creating a common language on the issue at company level, especially in those departments and business areas playing a key role in managing the respect for human rights. In relation to the risk models adopted, specific training and awareness activities will be provided to all procurement professionals worldwide and other professional families interested by the models implementation.

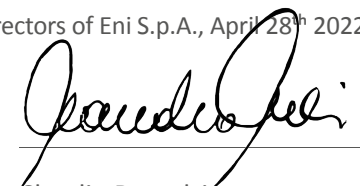
An internal procedure will also be adopted to define new standard human rights clauses to be applied – through a risk-based approach – in all other contracts signed by Eni in addition to those with suppliers.

*This statement refers to the entire Eni Group<sup>8</sup> in accordance with the UK Modern Slavery Act 2015, in particular with Article 54, and the Australian Modern Slavery Act 2018, in particular with section 14. It describes the steps taken by Eni during 2021 to prevent slavery and human trafficking in its supply chain or in any part of its own business<sup>9</sup>.*

*In the Annex are listed the Group's companies for which there is a disclosure obligation according to one or both of the regulation (UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018).*

<b>UK Modern Slavery Act (2015) – recommended criteria</b>	<b>Australian Modern Slavery Act (2018) – mandatory criteria</b>	<b>Eni's Slavery and Human Trafficking Statement</b>
Organisation's structure, its business and its supply chains.	Identify the reporting entity. Describe the reporting entity's structure, operations and supply chains.	Eni's business and supply chain.
Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls.	Human rights due diligence and risk management.
Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Human rights policies and governance Human rights due diligence and risk management Training and awareness Whistleblowing and grievance mechanisms
Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Assessing effectiveness
	Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls.	Consultation
	Any other relevant information.	Moving Ahead

This Statement has been approved by the Board of Directors of Eni S.p.A., April 28<sup>th</sup> 2022.



Claudio Descalzi  
CEO Eni SpA

Date: 28<sup>th</sup> April 2022

8. Eni Group refers to the parent company Eni S.p.A. and its consolidated subsidiaries as identified in the Annual Report

9. Annex A lists Eni subsidiaries that fall within the scope of application of the Modern Slavery Act 2015 and/or the Australian Modern Slavery Act.

## Annex A

*LIST OF ENTITIES FALLING WITHIN THE SCOPE OF APPLICATION OF THE UK MODERN SLAVERY ACT 2015 AND/OR AUSTRALIA MODERN SLAVERY ACT 2018 AND REQUIRED TO COMPLY WITH THE REPORTING OBLIGATIONS THEREUNDER (WHO THUS FORMALLY ADOPT ENI SPA STATEMENT BY THEIR OWN BOARD OF DIRECTORS' RESOLUTION):*

*Versalis S.p.A.; Versalis UK Ltd.; Versalis International SA (branch UK); Eni International B.V.; EniProgetti S.p.A.; Eni International Resources Ltd; Eni Global Energy Markets SpA; Eni Trade&Biofuels SpA; Finproject SpA; Eni UK Holding Plc; Eni UK Limited; Eni JPDA 03-13 Limited; Eni Australia BV; Eni Energy Solutions BV; Eni Plenitude SpA Società Benefit (former Eni Gas e Luce SpA in 2021); Burren Energy (Egypt) Limited; Burren Energy India Limited; Burren Energy Plc; Eni AEP Limited; Eni Ambalat Limited; Eni Arguni I Limited; Eni Australia Limited; Eni BTC Limited; Eni Bukat Limited; Eni CBM Limited; Eni Côte d'Ivoire Limited; Eni East Ganai Limited; Eni East Sepinggan Limited; Eni Elgin/Franklin Limited; Eni Ganai Limited; Eni Hewett Limited; Eni Hydrocarbons Venezuela Limited; Eni India Limited; Eni Indonesia Limited; Eni Investments plc; Eni Krueng Mane Limited; Eni Lasmo plc; Eni Liverpool Bay Operating Company Limited; Eni LNS Limited; Eni Middle East Limited; Eni Mozambique Engineering Limited; Eni North Sea Wind Limited; Eni North Ganai Limited; Eni Oil Algeria Limited; Eni Pakistan Limited; Eni Rapak Limited; Eni TNS Limited; Eni UHL Limited; Eni UKCS Limited; Eni ULT Limited; Eni ULX Limited; Eni West Ganai Limited; Eni West Timor Limited; Eni Yemen Limited; Liverpool Bay Limited; Liverpool Bay CCS Limited; Padanaplast Srl.*