



SLAVERY AND HUMAN

TRAFFICKING STATEMENT 2019



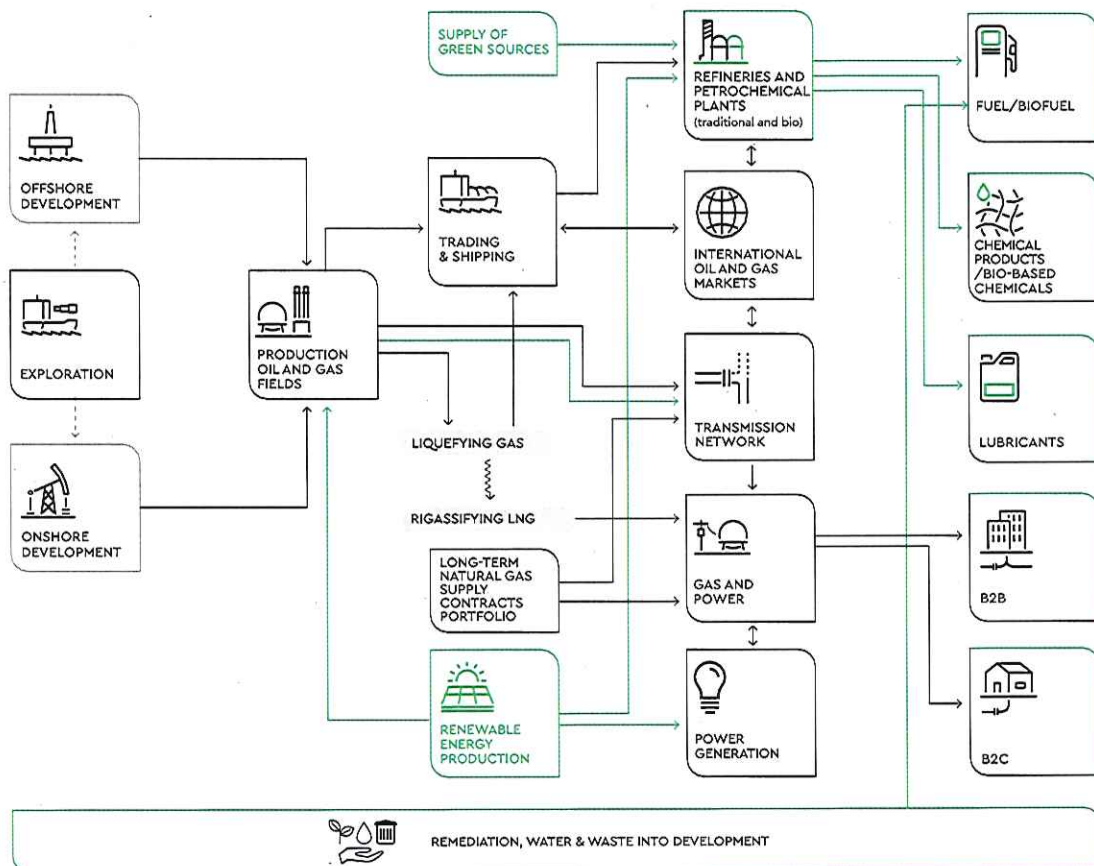
# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019

This statement refers to Eni Group<sup>1</sup> (herein referred to as “Eni”, “we”, “us”, or “our”) in accordance with the Modern Slavery Act 2015, in particular with Article 54, and describes the steps taken by Eni during 2019 to prevent slavery and human trafficking in its supply chain or in any part of its own business.

## 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. Indeed, we

believe 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>2</sup> to respect human rights. We have zero tolerance towards such human rights violations and expect our supply chain to comply accordingly.



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.

**ABOUT ENI**

**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 employs about 32,000 people in 66 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, Australia, Congo, Egypt, Ghana, Italy, Kazakhstan, Libya, Mexico, Mozambique, Nigeria, Norway, Oman, United Arab Emirates, the United Kingdom and the United States, overall in 41 countries.

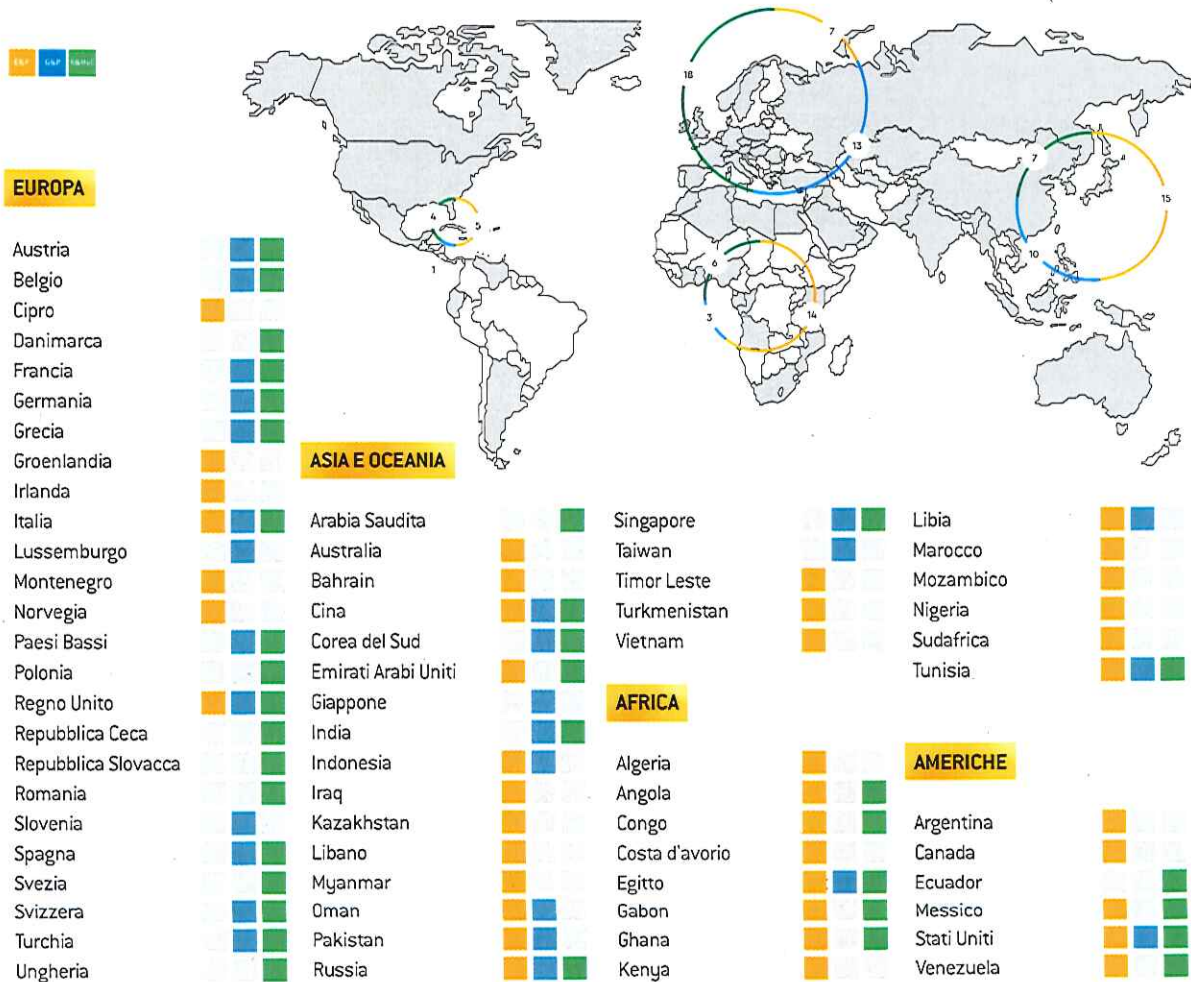
**Mid-Downstream**

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's subsidiary abroad has its own procurement department, which operates in compliance with Eni's procurement management system guidelines.

In 2019, more than 7,700 suppliers were awarded contracts globally.



**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. Non financial information is reported together with financial results in the 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 also approves the most important internal rules, including the Code of Ethics, and the Eni Statement on respect for human rights.

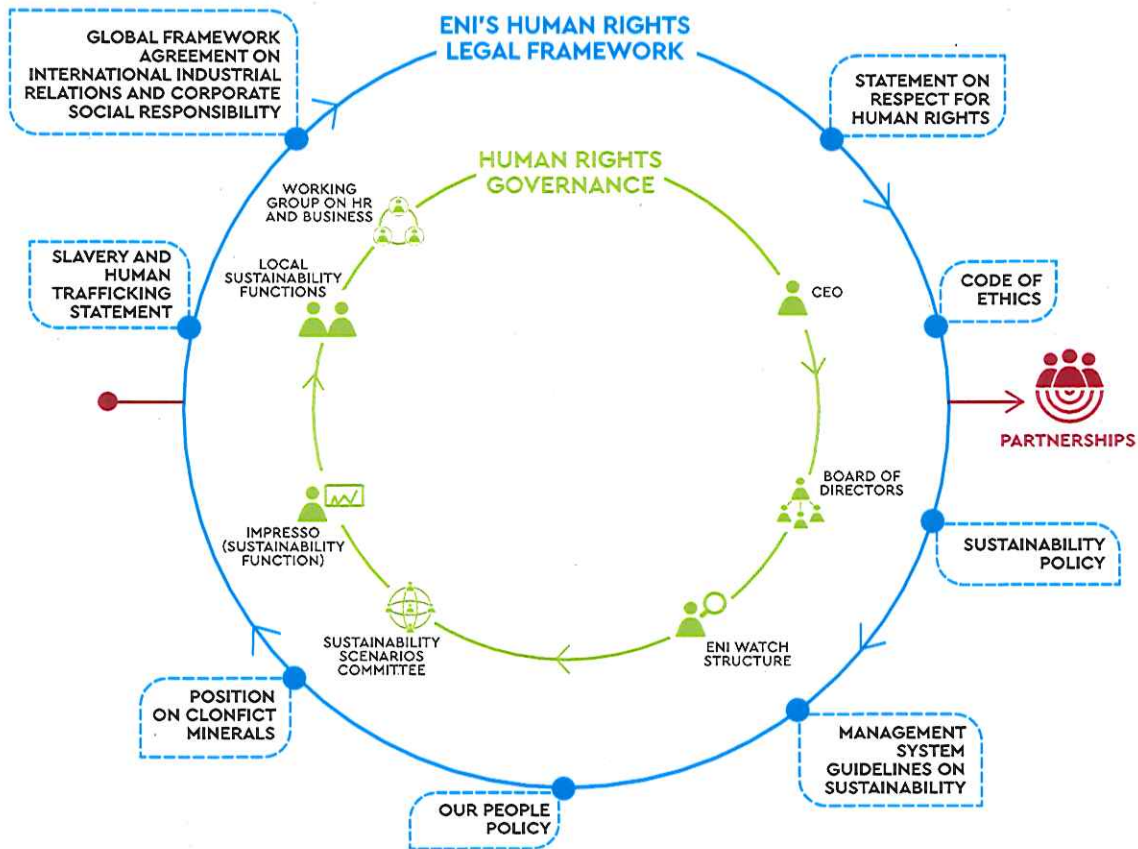
Further key functions played by the Board, after consultation with the Control and Risk Committee, are:

- the definition of the guidelines for the management of risks, 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.

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. Such results include human rights issues, even those related to supply chain, to the extent a potential violation is detected when assessing the above risks and measuring their impacts.

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.

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. In May 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. The Sustainability function is in charge of coordinating the 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 its 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. More detailed information on human rights issues addressed by the Board in 2019 is available in "[Eni For Human Rights](#)".

### 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, referred to our activities and our supply chain.

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. Our 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 in March 2020 and it includes in-depth boxes and questions, as well as references to Eni's regulatory instruments, including the present Statement.

[Eni's Statement on respect for human rights](#), approved in December 2018 by the Board of Directors, mirrors the requirements set out in the UN Guiding Principles, starting from an explicit commitment to both implement the human rights due diligence and provide access to remedy. The Statement contains a detailed section on business relationships and the respect for human rights in the supply chain, providing for instructions on how to assess risks of human rights abuses in the supply chain. Engaging the business partners in the prevention and mitigation of any adverse human rights impacts that their

operations, products or services might cause, or contribute to or are directly linked to, it is a key commitment of Eni's Statement. Specifically, on slavery and human trafficking, the Statement includes Eni's commitment to maintain and improve its practices to identify and combat such human rights violations in its supply chain.

As per risks affecting contractors' workers, Eni explicitly commits to ensuring that contractors when working for or together with Eni, agree to apply the guarantees to their workers provided in the "Human rights in the Workplace" Statement's section, and includes suitable contractual clauses against possible violations. Furthermore, Eni demands that any subcontracted activities are carried out in line with the same requirements included in the Statement. Finally, 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. 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.

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### Annex F "Respect and promotion of human rights in Eni's activities" Human Rights Impact Assessments

The document sets detailed internal procedure about the model adopted by Eni to ensure the respect for human rights in its business activities. The purpose of the procedure is to define roles and responsibilities in the conduction of the human rights due diligence, as the process of identification, evaluation, prevention and management of negative impacts on human rights that the company can produce, or help to produce, through its activities and business relationships and throughout its supply chain.

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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<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 sustainability and human rights issues.

Finally in 2019, having tested with a pilot held in Italy and abroad the market reaction to the introduction of a new [Supplier Code of Conduct](#), Eni has finalized its strategy for the distribution of the Code of Conduct connected with the Code of Ethics. The Code<sup>4</sup>, published in April

3. Main Italian trade union organizations

4. "The Code of Conduct is available at the following link [https://esupplier.eni.com/PFU\\_en\\_US/formazioneeiniziativa.page](https://esupplier.eni.com/PFU_en_US/formazioneeiniziativa.page)"

2020, states Eni’s commitment and expectations from 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. The code is now going to be spread across the supply chain, as part of a larger programme that Eni’s procurement is developing in order to raise awareness on sustainability and human rights issues and create the conditions for addressing Eni supply chain towards the strategic drivers of energy transition, circular economy and innovation. The programme is called JUST (Join Us in a Sustainable Transition) and it is going to build a SDGs oriented procurement approach, that will take in consideration sustainability in each and every step of its processes.

**Communicating our commitment**

Eni undertakes several initiatives aimed at raising awareness of human rights and at communicating its commitment. Moreover, on the International Human Rights Day 2019 Eni’s released its first “Eni For Human Rights”, a comprehensive report on the company’s activities in the area of human rights, which builds on the work carried out over the last years with the cooperation and fruitful engagement of human rights experts and organizations.

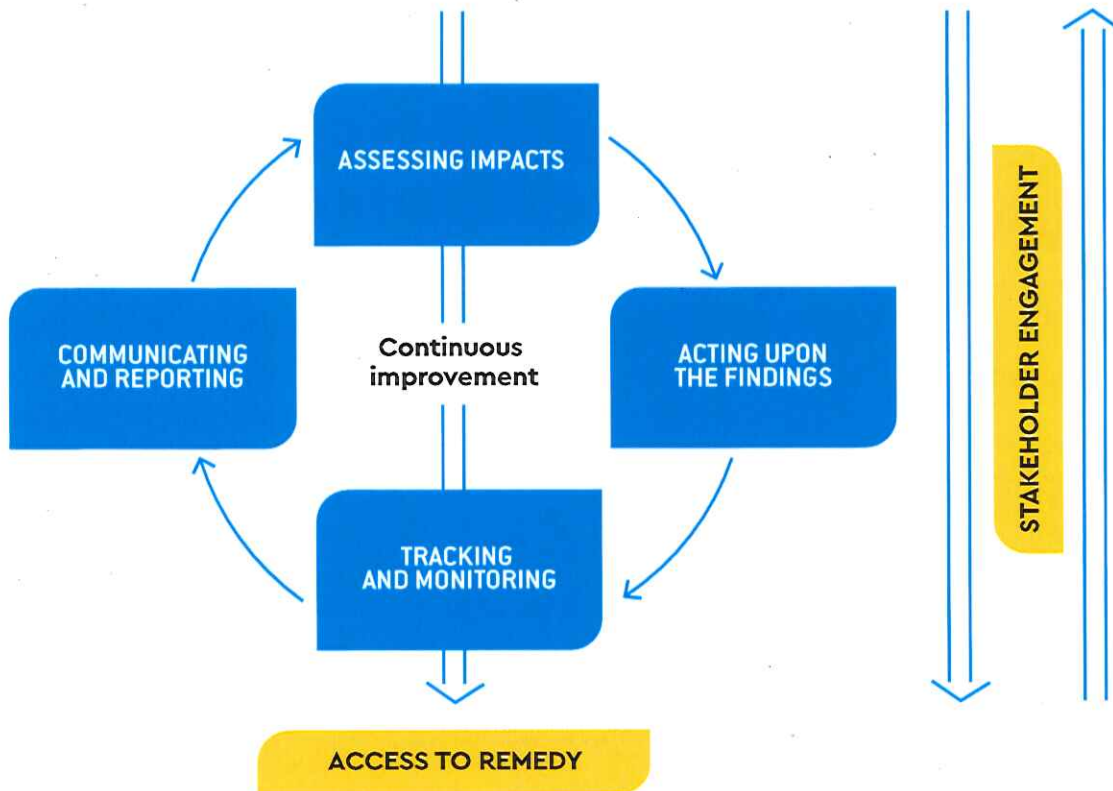
The report was drafted according to the UNGPs Reporting Framework.

Since 2017, within the process of financial and non-financial disclosure integration started in 2010, Eni’s Annual Report had included a specific section entitled “Consolidated Disclosure of Non-Financial Information”, as required by the Legislative Decree no. 254/2016. Such Information is complementary to the voluntary sustainability report that Eni has been publishing since 2006. All the reports<sup>5</sup> are available on Eni’s [website](#).

**HUMAN RIGHTS DUE DILIGENCE IN THE SUPPLY CHAIN AND RISK ASSESSMENT**

Eni is committed to carrying out a 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 the challenges deriving from specific 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, which are

**Adoption of a Commitment on Business and Human Rights**



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

subject to a structured screening, designed to verify and monitor their compliance with the main ILO standards, and subject to continuous improvement.

### Assessing risks

Eni has been developing and implementing different approaches and processes aimed at identifying impacts on human rights, even those ones linked with supply chain, such as modern slavery and human trafficking, in line with the UN Guiding Principles on Business and Human Rights.

To this aim, Eni adopts criteria for the qualification and selection of 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.

In 2019, in continuation with the previous years, Eni performed human rights assessment on suppliers, inspired to SA8000 standard and driven by risk-based criteria, based on factors such as country risk and sector risk. The country risk factor, carried out using indexes published by Verisk Maplecroft and ITUC, consists of a ranking of countries that takes into account geopolitical, cultural and legislative conditions according to the potential occurrence of human rights violations. 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. In 2020, in line with its continuous improvement approach, Eni will assess the risks of human rights violations along the supply chain in order to evaluate the opportunity to reinforce the existing controls.

Human rights issues are integrated into Eni's Integrated Risk Management (IRM) process, whose metrics requires each risk to be assessed based on relevant social, environmental, health and safety impacts. In detail, the IRM process captures human rights issues in terms of both:

- risk events, providing that events related to possible human rights violations are included in the Eni risks catalogue, which is periodically updated according to the results of the Risk Assessment process;
- impact metrics/clusters related to human rights violations. Such potential violations fall within the social, environmental, health and safety metrics of impacts, as already clarified. In addition, all violations of human rights (e.g. right to life, health, healthy working conditions, and free, prior and informed consultation, etc.) have been integrated within the impact clusters of the above metrics based on their severity. This ensures that each risk event is

evaluated and measured in terms of its human rights impact(s).

During 2019, the implementation of the "Integrated Country Risk" (ICR – whose purpose is to offer an integrated analysis of risks existing in countries of either presence or interest for the company) has been concluded. Such model duly includes risks of potential human rights violations.

Within the broader picture of human rights risks, the saliency of modern slavery risks was highlighted during the Workshop held in 2017, aimed at identifying **Eni's salient human rights issues**. The event was among the first activities launched by the newly established Eni Human Rights and Business Working Group.

Indeed, with specific reference to the supply chain, the following issues were assessed as salient from the 26 Managers from 22 Functional Areas, who 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 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 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. The issues identified and the way Eni manages them are described into "Eni For Human Rights".

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 source of strategic information on human rights risks, also deriving from suppliers' breaches of Eni's human rights requirements, is the ISO 26000 independent assessments carried out in 16 Eni's subsidiaries and/or districts between 2015 and 2019.

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**

Eni requires suppliers to make a formal commitment to respect principles contained in Eni's Code of Ethics and in the Eni's Statement on respect for human rights, the document that has progressively replaced the previous 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;
- assessing, beyond technical capacity, 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. Such 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 2019, Eni assessed around 6,000 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. This number has increased significantly compared to the previous year due to the inclusion of data relating to two further foreign Subsidiaries (Eni US Operating and Eni Angola) and to improvement in the reporting system. For 15% of these suppliers (898) were identified potential critical issues and/or possible areas of improvement attributable to HSE issues. In 89 % of these cases such

issues did not compromise the possibility to work with the suppliers, while for the remaining 11% of cases (96 suppliers) the identified critical issues led to the termination of relations with Eni on an ongoing basis. Indeed, these suppliers received a negative assessment during the qualification phase or were subject to a new impedimental measure (state of attention with clearance, suspension or revocation of the qualification) or a confirmation of the pre-existing impediment status, often issued by Eni as a precautionary measure also towards suppliers not directly contracted. The critical issues detected (with consequent request for implementation of improvement plans) during the qualification process or during the Human Rights Assessments are attributable to HSE issues or violations of human rights - for example health and safety standards, or violation of the Code of Ethics, corruption and eco-crimes. All areas for improvement are currently being addressed, none of them were related to modern slavery issues

As part of the wide-spectrum assessment, in 2019 Eni carried out 9 Human Rights Assessments (according to the SA8000 methodology) on specific suppliers at risk: 4 in Tunisia, 3 in Vietnam, 1 in Ecuador, 1 in Mexico.

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.

Moreover, according to Eni's commitment to prevent the trade and exploitation of minerals that support, contribute to or are associated with regional conflicts and human rights violations, in 2014, Eni 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 is available in the documents Eni's Position on Conflict Minerals and the Conflict Minerals Disclosure, available on our [website](#).

#### **Assessing effectiveness**

Eni committed to continuously improve 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 violations, also in terms of Modern Slavery practices. In 2019, relevant KPIs related to staff training, suppliers' assessment, whistleblowing events and screening of the supply chain have been monitored in continuity with the previous years; data and figures about the performance are available in the 2019 Annual Report, in the Sustainability Report "Eni For 2019" and in the Report "Eni For Human Rights".

Eni Managers in charge of activities that may generate human rights impacts have objectives linked to the in-



tegration of human rights into their processes and tools. These objectives can be assigned to Managers with various degrees of responsibility. The Sustainability Department is responsible for proposing and monitoring progress in such management Objectives, including respect for human rights in the supply chain.

In 2019, the actions set out by the Working Group launched in 2017 in the multi-year plan identifying the main areas for improvement and illustrating the actions necessary for the continuous progress of performance were also completed. These actions, associated with the 4 clusters of the Eni's salient human rights issues: human rights (i) in the workplace, (ii) in the community, (iii) in the supply chain and (iv) in security operations, have been incorporated into specific managerial objectives directly linked to human rights performances, assigned to all the 18 top managers who report directly to the CEO. 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.

**Training, awareness raising and capacity building**

Eni considers training and awareness-raising activities dedicated to its employees and business partners to be 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, in order to offer our colleagues and business partners the learning opportunities that best suit their needs.

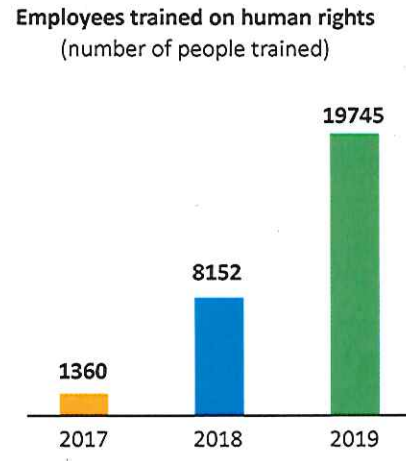
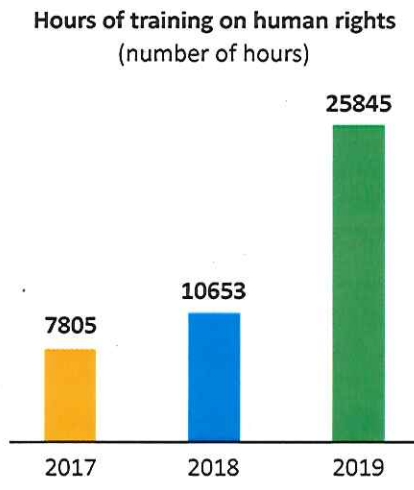
Eni's training on business and human rights is organized in a diversified strategy along four lines:

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

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- 2016** Massive e-learning program on the companies' responsibilities to respect human rights. The program was shaped benefiting from the technical expertise provided by the Danish Institute for Human Rights.
- 2017** Eni developed courses focusing on specific issues and functional areas
- 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.

This year, more than 19,000 people from staff to middle and top managers have participated in the training programme on human rights.



In 2019 was launched a specific training module on human rights risks along the supply chain for the Eni's Procurement professionals that will be progressively extended in 2020. Almost 1,000 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.

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.

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. Newly appointed members to Eni's Board of Directors participate in induction sessions focused also on the Code of Ethics. These sessions take place every time the Board is renewed. Regarding awareness raising initiatives, Eni takes every opportunity of meeting with suppliers to share with the market our goals and sensitise on human rights risks. In 2019, dedicated meetings have been organised at our operating sites, plus many institutional meetings.

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 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 150 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 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 Nigeria and Pakistan (2019), 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 IPECA'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. The toolkit was released online on March 2019. Details on Eni's human rights training program are available in "[Eni For Human Rights](#)".

## WHISTLEBLOWING & 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](#). **As per 2019, 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 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. Details are available in "[Eni For Human Rights](#)".

## MULTI-STAKEHOLDER ENGAGEMENT

Engagement with representatives of rights-holders is an essential feature 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 Athens in June 2019. 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.

In 2019 Eni participated once again in the engagement process organized by Corporate and Human Rights Benchmark, confirming itself among the 10 best companies analyzed.

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

Finally, Eni had cooperated with the Danish Institute for Human Rights (DIHR) since 2008. The partnership encompassed a wide range of activities, from support on how to structure Eni's human rights due diligence process to assignments focused on specific operating projects, including human rights compliance and impact assessments.

#### NEXT STEPS

In 2020 Eni will share the new Suppliers' Code of Conduct with all the suppliers that will undertake a process of self-application, qualification updates or tender. In line with the new Code of Ethics, 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, starting from 2020 Eni will reinforce further this action by delivering this learning course to all its middle and senior managers in light of their role 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., April 23<sup>rd</sup> 2020.



Claudio Descalzi  
CEO Eni SpA

Date: 11th May 2020

*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 Trading & Shipping S.p.A. on 15<sup>th</sup> May 2020*

*Cristian Signoretto  
Chairman and CEO Gas, LNG and Power of Eni Trading & Shipping S.p.A.*

