

Eni *FOR*

2024

HUMAN RIGHTS





# Mission

We are an energy company.

- 13 15** We concretely support a just energy transition, with the objective of preserving our planet
- 7 12** and promoting an efficient and sustainable access to energy for all.
- Our work is based on passion and innovation,
- 9** on our unique strengths and skills,
- on the equal dignity of each person,
- 5 10** 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
- 17** and communities where we operate, bringing long-lasting prosperity for all.

## Global goals for a sustainable development

The 2030 Agenda for Sustainable Development, presented in September 2015, identifies the 17 Sustainable Development Goals (SDGs) which represent the common targets of sustainable development on the current complex social problems. These goals are an important reference for the international community and Eni in managing activities in those Countries in which it operates.



# Eni *FOR* 2024 HUMAN RIGHTS

## Disclaimer

Eni for 2024 is a document published on a yearly basis that contains forward-looking statements related to the different topics covered therein. Forward-looking statements are founded on Eni management's reasonable assumptions and beliefs given the information available to them at the time the statements are made. Nevertheless, by their nature, forward-looking statements involve an element of uncertainty as they relate to events and depend on circumstances that may or may not occur in the future and which are, in whole or in part, beyond Eni's control and reasonable prediction. Actual results may differ from those expressed in such statements, depending on a variety of factors, including, without limitation: the fluctuation of the demand, the offer and pricing of oil and natural gas and other petroleum products, the actual operating performances, the general macroeconomic conditions, geopolitical factors and changes in the economic and regulatory framework in many of the Countries in which Eni operates, the achievements reached in the development and use of new technologies, development of scientific research, changes in the stakeholders' expectations and other changes to business conditions. The readers of the document are therefore invited to take into account a possible discrepancy between the forward-looking statements included and the results that may be achieved as a consequence of the events or factors indicated above. Eni for 2024 also contains terms such as, for instance, 'partnership' or 'public/private partnership' used for convenience only, without a technical legal implication. In this report 'Eni' means the parent company Eni SpA and its consolidated subsidiaries.

## Photos


All the photos of the covers and the Eni for 2024 Reports come from the Eni photographic archive.






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# Why it is important for Eni



The current international scenario risks seriously undermining the respect for the dignity of every human being, as well as the value of dialogue to ensure cooperation and peace, adding to the complexity of the energy transition.

A systematic and comprehensive approach to human rights is the prerequisite for a transition that addresses the local energy needs, building long-lasting relationships that generate fruitful shared value for workers and local communities, while preserving the environment and promoting human development. In Eni, such approach has been shaped over time and has constantly evolved in consideration of the dialogue with our rightsholders and society at large, valuing their expectations and establishing fair and equal relationships. As long as anyone is still facing obstacles in advancing on access to fundamental rights and the pursuit of the Sustainable Development Goals, we must lay the groundwork for that development to take place. In a word, this is the 'just transition' we believe in.

**CLAUDIO DESCALZI**  
Chief Executive Officer



# Why reading Eni for Human Rights



The sixth edition of this thematic report, published in August 2025, aims to describe Eni's approach to human rights. It provides detailed information on how Eni has taken commitment and structured its own system to be in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The introduction of the Report provides an overview of Eni's activities, business model and presence worldwide. The remaining sections mirror the UNGPs pillars:

- Eni's commitment to respect for human rights, including the internal policies and rules, the role of the Corporate Governance, and the training initiatives.
- The human rights due diligence, set on risk-based approach and the salient human rights issues identified.
- Three chapters dedicated respectively to Eni's workers, the workers in the value chain, and the communities. Each chapter describes the risk-based approach to identify, prevent and manage the impacts to the rightsholders as well as some cases and performance indicators.
- A final chapter dedicated to the access to remedy, which describes the methodology, and the process applied by Eni to provide access to remedial measures in the event of impacts resulting from or associated to its activities.

The report is written considering the recommendations of the UN Guiding Principles Reporting Framework (published in February 2015).

This report is intended to be a deep dive of what is already described in Eni for a Just Transition 2024. Some contents of the report are already published in other Eni's documents, links to such other sources are provided to allow readers navigating among them.



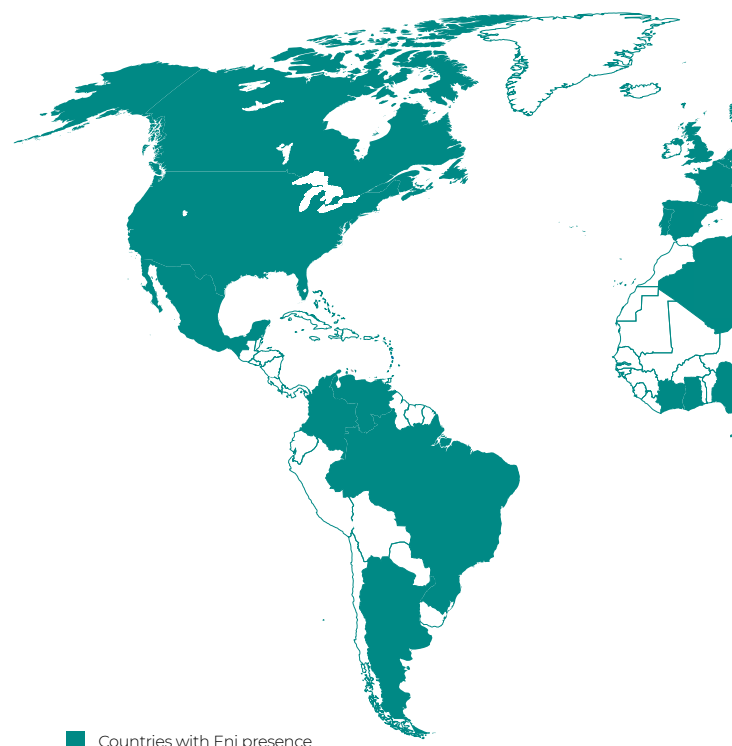
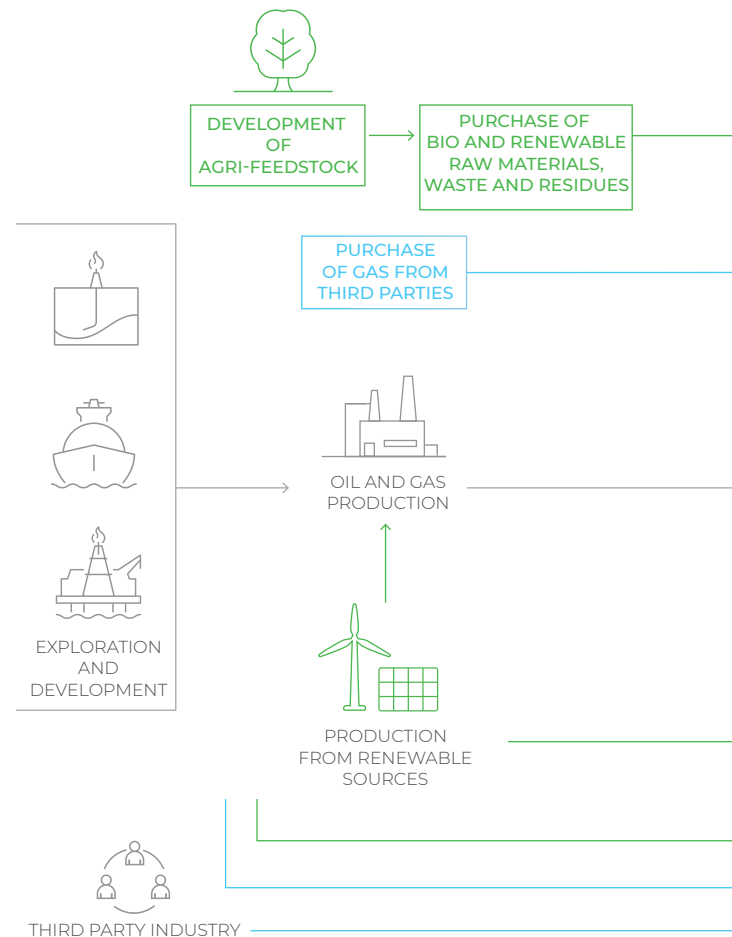
# Eni activities and business model

Eni is an energy company, integrated along the entire value chain. It has a significant presence in the traditional activities of exploration and production of conventional oil and gas and in the marketing of gas/LNG through an extensive supply portfolio.

In the downstream oil/petrochemicals industry, a major process of transformation and reconversion is underway. Eni is engaged through innovative business models in the development of new energies and decarbonization services: renewables from solar/wind, biofuels, biochemistry, CO<sub>2</sub> capture/sequestering and research lines on new energy paradigms (magnetic fusion, chemical recycling of plastics). Eni has a large customer base of both industrial and end-user customers.

The Group's distinctive strategy is founded on competitive advantages, in-house expertise and proprietary technologies as reference points with the aim to grow, create value and transform the Company.

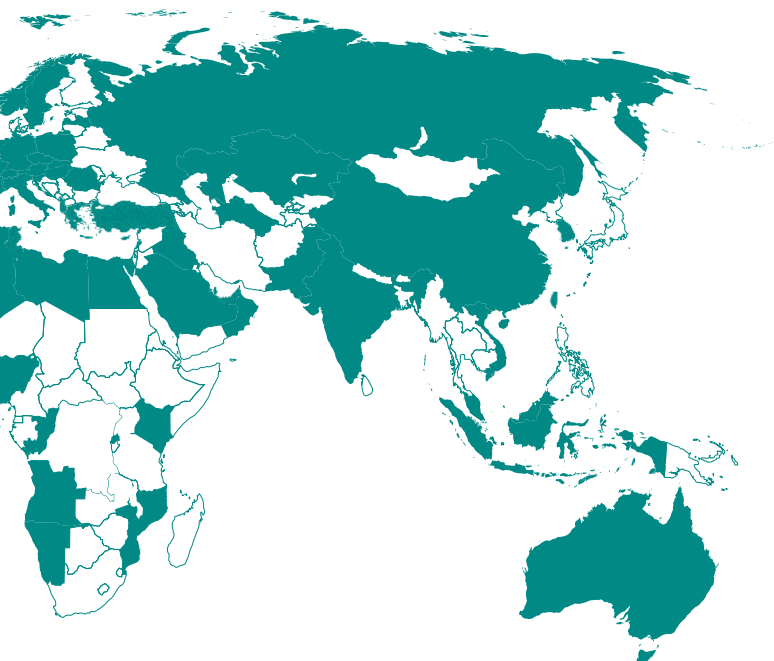
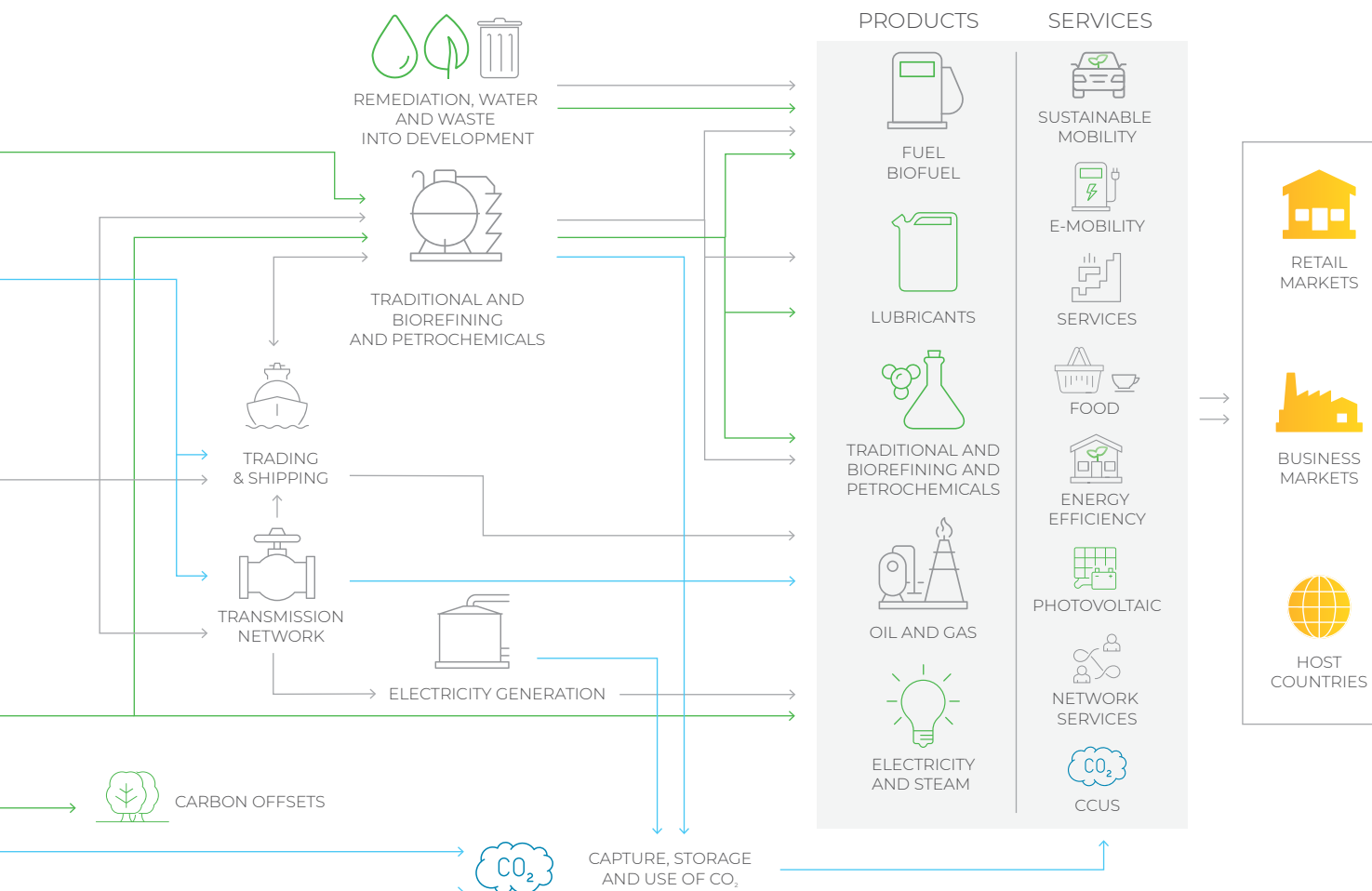
In traditional activities, growth and returns leverage on successful exploration, with an option for early monetisation of discoveries, efficient resource development and the establishment of independent entities in synergy with qualified partners, in focused geographic areas, to pursue development opportunities and profitability. In activities related to the energy transition, Eni's satellite model involves the establishment of entities engaged in the development of products and solutions with reduced carbon footprint, capable, thanks to the entry of dedicated capital, of growing autonomously and financially independently, releasing value for the parent company, as evidenced by the successes of Enilive and Plenitude.



See also:

[Eni's Annual Report](#) and [Eni for 2024 - A Just Transition](#)

Countries with Eni presence



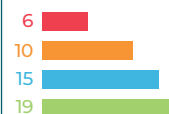
## AMERICAS

7 COUNTRIES



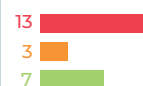
## EUROPE

23 COUNTRIES



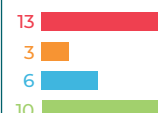
## AFRICA

13 COUNTRIES



## ASIA AND OCEANIA

21 COUNTRIES



Exploration & Production\* Global Gas & LNG Portfolio and Power  
Enilive and Plenitude Refining and Chemicals

\* CCUS and agri-business included

## VALUE CREATION FOR ALL STAKEHOLDERS

### INPUT

#### FINANCIAL RESOURCES

Net Invested Capital  
(€ bln) **74.3**

Capex (€ bln) **8.8**

Contribution of portfolio  
operations (€ bln) **3.5**  
(proforma)

#### ENERGY AND NATURAL RESOURCES

Oil & gas  
exp/development licenses  
(thousand km<sup>2</sup>) **211**

Net proved reserves  
(bln boe) **6.5**

Fresh water withdrawals  
(mm<sup>3</sup>) **127**

#### INDUSTRIAL ASSETS

Biorefinery  
capacity  
(mln tons/y) **1.65<sup>2</sup>**

Group renewable  
capacity (GW) **4.1<sup>1</sup>**

#### PEOPLE AND SKILLS

Employees **32,492<sup>3</sup>**

Women in the  
Labour force (%) **28.3**

★ Training hours  
(thousand) **1,027**

#### RESEARCH AND DEVELOPMENT

★ R&D expenditure  
(€ mln) **178**

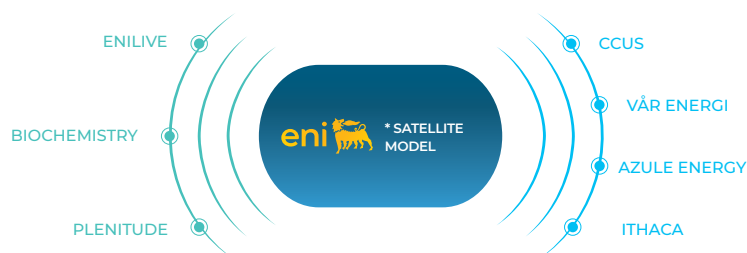
★ Patents **10,244**

#### RELATIONS AND COLLABORATIONS

★ Gas & power  
customers (million) **10<sup>1</sup>**

Investments for local  
development (€ mln) **88.8**

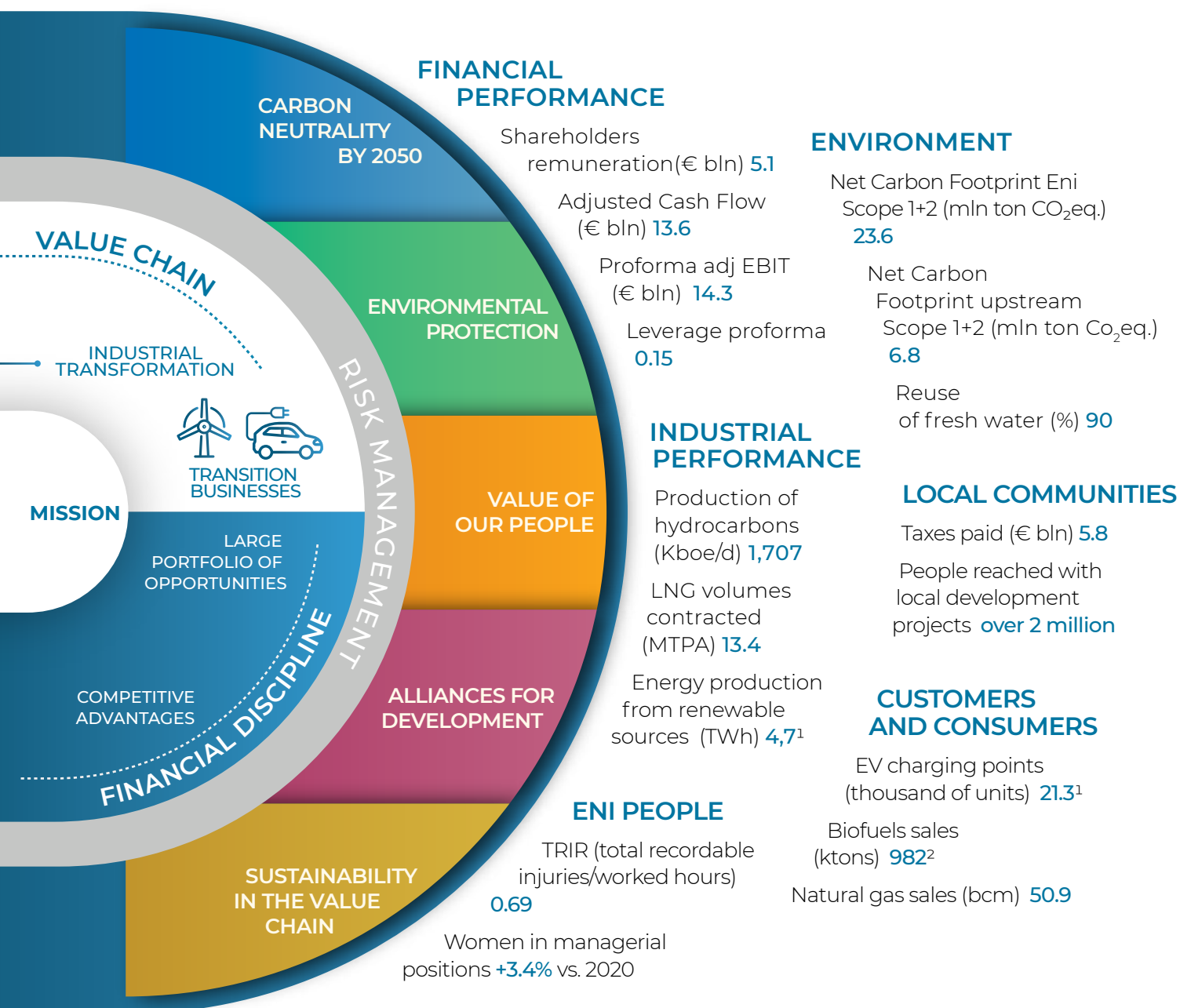
### STRATEGY AND TARGET SUSTAINABLE DEVELOPMENT GOALS





Through an integrated presence across the entire energy value chain

## OUTCOME AND OUTPUT



★ Intangibles

1) 100% Plenitude, 2) 100% Enilive

3) This figure differs from the one published in the Sustainability Statement/in Eni for, as it does not include only the fully consolidated.

# Eni's approach to human rights

Eni's approach to human rights is integrated in the Mission and is outlined in the Policy 'Respect for Human Rights in Eni', approved by the Board of Directors, which outlines priority areas of commitment, consistent with the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises<sup>1</sup>. This commitment is also reiterated in the Code of Ethics and supported by the commitments required in the Supplier Code of Conduct. The dignity of every human being is at the core of Eni activities and Eni always operates with the well-being of those rights-holders directly and indirectly affected by the Company's activities as a reference. A similar expectation is placed on business partners operating on behalf of Eni or to whom phases of Eni's industrial activities are contracted.

## ENI'S APPROACH TO HUMAN RIGHTS

<b>GOVERNANCE AND COMMITMENT</b> Human rights have been incorporated into governance policies and processes, including through the structuring of appropriate training frameworks.	<b>DUE DILIGENCE</b> Eni has adopted a management system which includes a set of processes and tools to assess the most relevant issues, risks and impacts related to the respect for human rights.	<b>ACCESS TO REMEDY</b> Eni ensures adequate handling of complaints through the Grievance Mechanism, the whistleblowing process and the handling of complaints submitted to the National Contact Point according to OECD guidelines.
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<sup>1</sup> Other relevant references for the Policy are: the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the ILO Declaration on Fundamental Principles and Rights at Work; the ILO Guidelines for a Just Transition to Environmentally Sustainable Economies and Societies for all; the UN Declaration on the Rights of Indigenous Peoples; the ILO Indigenous and Tribal Peoples Convention; the IFC Performance Principles on Environmental and Social Sustainability; the Voluntary Principles on Security and Human Rights (VPSHR).

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# Policies and other commitments

Eni's work is guided by the values and principles described in the Code of Ethics, in the Policy 'Respect for Human Rights in Eni', and in the Suppliers Code of Conduct.

## Code of Ethics

The Code 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 actions 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 inspires the model of organization, management, and control. The Code of Ethics applies to all direct and indirect subsidiaries, both in Italy and abroad, and to all Eni's stakeholders.

See also: [🔗 Code of Ethics](#)

## Policy 'Respect for Human Rights in Eni'

The Policy includes an explicit commitment to both implementing the human rights due diligence and providing access to remedy in accordance with the main international frameworks (e.g. UNGPs and OECD Guidelines). The Policy was approved by the Board of Directors of Eni SpA on September 14<sup>th</sup>, 2023. It outlines a single and cross-cutting model to ensure compliance and respect for human rights in the design of corporate regulatory processes, also considering the ongoing regulatory developments on the topic, capitalizing in a single document the meaningful internal regulatory heritage developed by Eni over the years. Eni involves third parties in the observation of these principles set out in the Policy and the specific commitments Eni has made. The sustainability function and the Integrated Compliance function ensure, each for their area of concern, the implementation of the Policy and its monitoring, as well as guaranteeing, through a so-called 'embedded' approach, the integration of human rights issues in the design of corporate processes, including relations with Third Parties and external Stakeholders.

See also: [🔗 Policy Respect for Human Rights in Eni](#)

Every Group's company or subsidiary transposes the Policy into local language and spreads it among workers.

## Supplier Code of Conduct

The Code 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 act against modern slavery, child labour, discrimination in the workplace and the respect for workers' rights according to the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

See also: [🔗 Supplier Code of Conduct](#)

## The Policy Zero Tolerance against violence and harassment in the workplace

Written in accordance with the principles of the Convention 190 of the International Labour Organisation on the Elimination of Violence and Harassment in the Workplace, it defines a broad perimeter of types of harassment that allows Eni to identify misconduct and behaviour that should not be engaged in and should be reported. Eni wants to increasingly ensure a working environment free from violence and harassment of any form, where the people of Eni can all feel protected and free to express ourselves.

See also: [🔗 The Policy Zero Tolerance against violence and harassment in the workplace](#)

*Read more*

Other Policies connected with the respect of rights of Eni's stakeholders

[🔗 Policy Diversity and Inclusion](#); [Policy Privacy and data protection](#) [🔗 Policy Consumer protection & Green Claims](#)

See also: [🔗 Eni Corporate Governance and Shareholding Structure Report 2024](#)



In addition to such guiding documents, there are other statements, positions and agreements which outline principles and commitment focused on relevant topics.

### The Global Framework Agreement on International Industrial Relations and Corporate Social Responsibility

The GFA was lastly renewed in 2019 by Eni, the IndustriALL Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL trade unions, and it is now under renewal in 2025. It includes specific provisions regarding the respect for international standards on human and labour rights as well as appropriate clauses against any violations of such rights, in addition to the requirements for qualifying suppliers and subcontractors.

The Parties of the Agreement annually meet to share information on certain issues including those pertaining to sustainability and human rights.

See also: [🔗 The Global Framework Agreement on International Industrial Relations and Corporate Social Responsibility](#)

### Slavery and Human Trafficking Statement

According to the requirements of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018, the Statement describes the risks identified and the measures taken to address modern slavery in Eni direct operations and along its supply chains. The Statement is updated on annual basis, duly discussed with the Sustainability and Scenarios Committee and approved by the Board of Directors.

Eni rejects any form of forced or compulsory labour as well as any exploitative labour practices including, for example: restriction to the freedom of movement and seizure of identity documents. Eni is committed to respecting the minimum age of access to employment, which cannot be lower than the age at which a child completes compulsory schooling and, in any case, not below 15 years of age.

See also: [🔗 Slavery and Human Trafficking Statement](#)

### Eni's position on conflict minerals

Written to be compliant with the Section 1502 of the Dodd-Frank Act enacted by United States Security and Exchange Commission, it outlines Eni's commitment and measures on conflict minerals. Eni's standard contractual terms regarding the supply of products that contain or may contain Conflict Minerals include binding and clear-cut requirements regarding Conflict Minerals and responsible sourcing.

See also: [🔗 Eni's position on conflict minerals](#)

## Focus on

### The EU Corporate Sustainability Due Diligence Directive

The Corporate Sustainability Due Diligence Directive (CSDDD) marks a significant step in the European Union's commitment to integrate due diligence on human rights into business strategies and processes. Officially published in July 2024, the Directive is now undergoing a review under the "Omnibus" proposal presented by the European Commission in February 2025.

The CSDDD builds on prior initiatives, and it is the most ambitious and wide-ranging attempt to reflect voluntary guidelines, like those present in the UN Guiding Principles (UNGPs) and the OECD Guidelines for Multinational Enterprises (MNEs) within legally binding rules, with the aim of embedding due diligence in risk management systems and to harmonize due diligence standards.

Since the beginning of the process that led to the adoption of the original Due Diligence Directive, Eni has constructively engaged policy makers sharing its own efforts and processes in this domain. Eni has also focused its contribution on the required level of clarity and practical aspects linked to the actual applicability of the foreseen rules, based on its own experience, internal rules and best international standards that it applies. Once the Directive revision was launched under the "Omnibus" proposal, Eni has actively participated together with other interested stakeholders convened by the European Commission as part of the consultation process.

Given the objective complexity and challenges (linked to raising compliance costs and business & legal certainty) that the CSDDD poses to European and non-European businesses that – in the case of our sector – are part of the European energy value chain, Eni has also contributed to sector initiatives and positioning with other peers and as part of industrial associations on this topic.





Eni continues to support the overarching objective of addressing human rights and environmental impacts and has been indeed voluntarily implementing UNGP-aligned human rights due diligence mechanisms since 2011.

# Governance and human rights

## BOARD OF DIRECTORS AND COMMITTEES

Eni's Corporate Governance system is based on the principle of integrity and transparency and supports the integration of sustainability within the business model and strategy. The Corporate Governance Code identifies 'sustainable success' as the objective that must guide the actions of the Board of Directors and it consists in creating long-term value for the benefit of shareholders, considering the interests of the other relevant stakeholders.

### ROLES AND RESPONSIBILITIES OF THE BOD, THE CEO, THE CHAIRMAN OF THE BOD AND THE COMMITTEES ON SUSTAINABILITY TOPICS

<b>BOARD OF DIRECTORS</b> 	<b>Defines:</b> <ul style="list-style-type: none"> <li>• The Corporate Governance System;</li> <li>• the fundamental lines of the organisational, administrative and accounting set-up and the guidelines of the internal control and risk management system;</li> <li>• the strategic lines and objectives, pursuing their sustainable success and monitoring their implementation, as proposed by the CEO;</li> <li>• with a view to pursuing sustainable success, in line with the Governance Code, it promotes dialogue with shareholders and other stakeholders relevant to the Company.</li> </ul>	<b>Reviews or approves:</b> <ul style="list-style-type: none"> <li>• The fundamental outlines of the internal Regulatory System and the main corporate regulatory instruments;</li> <li>• the Strategic Plan (four-year plan and medium-to-long-term plan), which includes industrial business targets, economic and financial results and sustainability targets, including medium/long-term emission targets;</li> <li>• the main risks and impacts, including socio-environmental ones;</li> <li>• the Policy for the Remuneration of Directors and managers with strategic responsibilities;</li> <li>• financial and sustainability reporting.</li> </ul>		
<b>CHIEF EXECUTIVE OFFICER</b> 	<ul style="list-style-type: none"> <li>• The person in charge of managing the Company, without prejudice to the tasks reserved to the Board;</li> <li>• implements the resolutions of the BoD, informs and submits proposals to the BoD and to the Committees;</li> <li>• in charge of establishing and maintaining the Internal Control and Risk Management System.</li> </ul>		<b>CHAIRMAN OF THE BOARD OF DIRECTORS</b> 	<ul style="list-style-type: none"> <li>• Central role in the system of internal controls;</li> <li>• leads the BoD's activities and ensures that Directors are trained on sustainability topics.</li> </ul>
<b>COMMITTEES</b> 	<b>Sustainability and Scenarios Committee</b> <p>It assists the BoD with preparatory, consultative and advisory functions on scenarios and sustainability issues. This means processes, initiatives and activities to oversee the Company's commitment to Sustainable Development along the value chain, in particular on issues of climate transition and technological innovation, environment and energy efficiency, local development, human rights, integrity and transparency, and D&amp;I.</p>	<b>Control and Risk Committee</b> <p>It supports the BoD in evaluations and decisions relating to the internal control and risk management system, and in particular in the quarterly review of the main risks, including ESG risks, and the approval of periodic financial and sustainability reports.</p>	<b>Remuneration Committee</b> <p>It informs, makes proposals and provides advice to the Board of Directors on remuneration topics, and in this context proposes annual and long-term rewarding systems, defining their objectives, also supporting the guidelines adopted on sustainability topics.</p>	<b>Nomination Committee</b> <p>It supports the BoD in the appointments, in the periodic assessments of directors' requirements and in the board review process, formulating opinions for the BoD on the composition of the BoD and of its Committees, also with respect to the required competencies.</p>

Eni's Sustainability and Scenarios Committee (SSC), composed of several members of the Board of Directors, performs investigative, advisory and proposal-making functions for the Board of Directors on processes, initiatives and activities aimed at overseeing Eni's commitment to sustainable development along the value chain, including respect for human rights. Each year, the main updates made to the human rights management system, the main areas of intervention and the activities carried out are presented to the SSC. In 2024, the annual meeting with the SSC was extended to all members of the Board of Directors for a 'board induction' on the evolution of the human rights regulatory environment and to share the results of the updated mapping of salient human rights issues and of the compliance risk assessment carried out during the year. The Committee, or the entire Board, is involved in regular induction sessions on the topic, also engaging external human rights experts: in 2023 the session was held by John Morrison, former CEO of the Institute for Human Rights and Business, with a focus on the main challenges and developments in the business and human rights space. Finally, the Board of Directors annually approves Eni's Slavery and Human Trafficking Statement, drafted in compliance with UK and Australian legislation on modern forms of slavery (Modern Slavery Act).

BOARD'S SKILLS AND KNOWLEDGE

In 2024, the Board of Directors conducted its annual self-assessment (Board Review) with the support of an external consultant, examining the composition and operations of the Board of Directors and its Committees, also with reference to ESG/sustainability matters. The process confirmed a positive assessment of board members' competencies. These skills were also reinforced in 2024 by the 'board induction' training program for directors and auditors.

SELF-ASSESSMENT OF THE OVERALL SKILLS, KNOWLEDGE AND EXPERIENCE OF THE BOARD OF DIRECTORS (%)



See also: [Eni Corporate Governance Code](#)  
and [Eni Corporate Governance and Shareholding Structure Report 2024](#)

INCENTIVES AND REMUNERATION LINKED TO SUSTAINABILITY AND HUMAN RIGHTS TARGETS

Eni's Remuneration Policy establishes that the remuneration of Directors, Chief Operating Officers and Managers with Strategic Responsibilities is functional to pursue sustainable success of the Company, fulfill the corporate mission. It reflects the need to have, retain and motivate people with the skills and professionalism deemed suitable for the role assigned.

See also: [Report on the 2025 Remuneration Policy and remuneration paid 2024](#)

On annual basis, Eni Managers of departments which could be linked to potential human rights impacts receive objectives aimed at integrating a human rights perspective in their activities, together with the other operational, economic and financial targets. These objectives, and related incentives, are assigned to Managers with various degrees of responsibility (i.e. Directors, Global Heads or Managing Directors, Commercial Managers of Eni subsidiaries, etc.) and are aligned with the four-year Strategic plan, considering, among others, coherence with human rights policies. In addition, Eni's variable remuneration schemes maintain a strong link with Eni's sustainability goals, including those relating to human rights, with a weighted percentage ranging between 10% and 25%, depending on the responsibilities assigned and the impact on the results. In this process, the Sustainability function is responsible for proposing and monitoring the progressive fulfilment of the Management Objectives on Sustainability issues, including human rights. In 2024, objectives linked with human rights performances were assigned to several top managers reporting directly to the CEO and to over 50 senior managers and Managing Directors of Eni's subsidiaries, on top of their operational and economic-financial targets. Such Management Objectives linked to several human rights targets are reviewed annually and they cover the entire spectrum of Eni's salient human rights issues such as, among others: freedom of association and collective bargaining, health and safety, modern slavery, land rights, indigenous people rights, security, water sanitation.



## ROLE AND RESPONSIBILITIES IN IMPLEMENTING POLICIES AND STRATEGIES

The Sustainability function and the Integrated Compliance function oversee, each for its own area of concern, the overall day-to-day approach of Eni to human rights and support Eni's business/staff functions to ensure respect for human rights within their processes, according to the identified salient human rights issues.

In this framework, the Head of the Sustainability Function leads the coordination of initiatives aimed at guaranteeing respect for human rights in business activities in line with international principles, together with the support/business functions concerned. Such a role is ensured through engagement and coordination with all Eni's functions.

The Sustainability function is responsible for cooperating with all the Company's functions in finding day-to-day solutions to human rights issues and for providing technical assistance to the Sustainability and Scenarios Committee.

The competent 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, taking into account context specific human rights issues, such as indigenous peoples' rights and the responsible acquisition of land, benefiting of the technical assistance provided by the Headquarter Sustainability function.

Human Resources, Procurement and Security Departments have a primary interest in human rights due to their pivotal role in the processes they respectively oversee; therefore, they shall be considered owners of specific commitment areas associated with Eni's salient human rights issues: the Human Resources and Organization Dept. is responsible for the respect of human rights in the workplace; the Procurement Dept. for the respect of human rights in the supply chain; the Security Dept. for the respect of human rights in assuring the security of Eni's people and assets. Each of these departments set specific human rights due diligences with the aim of identifying areas of risk and take appropriate actions to prevent negative impacts on human rights. The methods and the activities are agreed with the Sustainability and the Integrated Compliance Departments which monitor and ensure the overall implementation of the human rights management system as a whole.

With respect to corporate social responsibility, including human rights, the Compliance Department is committed to develop, inter alia, standard contractual instruments and clauses. With regard to the human rights-related matters, the dedicated in-house Legal Department: (i) carries out the monitoring of the evolution of the global human rights-related trends pursuant to the international jurisprudence, the pre-contentious environment as well as the existing and developing worldwide regulation, for the purpose of contributing to the evaluation of the company's risks associated thereto and to the determination of the appropriate mitigations; (ii) provides consultancy and legal support to the impacted corporate's functions, as appropriate.

# Integrated Risk Management

Eni has developed and adopted an Integrated Risk Management Model (IRM Model) supporting Eni's management awareness in taking risk-informed decisions through risk assessment and analysis, with an integrated, comprehensive and prospective vision. Such model includes the human rights risks.

The IRM Model is based on a system of methodologies and skills that leverages on criteria ensuring consistency of the evaluations ensuring consistent and effective analysis and evaluation to support main decision making (definition of the Strategic Plan) and to guarantee the disclosure to the administration and control bodies.

Risk Governance attributes a central role to the Board of Directors (BoD) which defines, on the basis of the analyses proposed by the Chief Executive Officer (CEO) and with the support of the Control and Risk Committee, with reference to the four-year Strategic Plan, the nature and level of risk compatible with the company's strategic objectives, including in its assessments all the elements that may be relevant with a view to the sustainable success of the company.

The IRM process ensures the detection, consolidation and analysis of all Eni's risks and supports the Board of Directors to verify the compatibility of the risk profile with the strategic targets, also in a medium/long-term approach. The IRM supports management in the decision-making process by strengthening awareness of the risk profile and the associated mitigations.

The process, regulated by the Global Procedure 'Integrated Risk Management', is continuous, dynamic and includes the following sub-processes: (i) Risk strategy; (ii) Integrated Risk Assessment; (iii) Integrated Country Risk; (iv) Integrated Project & M&A Risk Management.

Eni's top risks portfolio consists of 20 risks classified in: (i) external risks, (ii) strategic risks and, finally, (iii) operational risks. Among the external risks, the 'relationship with local stakeholders' includes the respect and promotion of human rights.

Finally, risks of potential human rights impacts are included in 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. Eni uses third-party provider (Verisk Maplecroft) to evaluate the human rights risks of the operating Countries.

See also: [Eni Annual Report 2024](#) and the [dedicate webpage](#)

# Training and awareness

Eni considers training and awareness-raising activities dedicated to its employees and business partners an essential element of its commitment to respecting human rights. Eni wants to ensure that every employee is aware of the importance of human rights to the Company and of the principles set in the 'Policy Respect for Human Rights in Eni'. Over the last few 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 each need.

## ENI'S TRAINING ON BUSINESS AND HUMAN RIGHTS

### GENERAL COURSES ON BUSINESS AND HUMAN RIGHTS TO ALL ENI PEOPLE

### SPECIFIC COURSES ON TOPICS AND AREAS PARTICULARLY EXPOSED TO RISKS OF NEGATIVE IMPACTS

### TRAINING INITIATIVES ON ISSUES CLOSELY LINKED WITH HUMAN RIGHTS (E.G. CODE OF ETHICS, HSE, ETC.)

### TRAINING COURSES ON SECURITY AND HUMAN RIGHTS

In the last five years, more than 70,000 hours of training were provided: almost 68,000 during the mandatory three-year training program (2020-2022, held in Italy and abroad) and almost 2,000 in the last two years on a voluntary basis for all other employees.

TOPIC	PARTICIPANTS (in HQs and subsidiaries)
Respect for Human Rights in the management of Security Operations	All employees and managers of the Security function
Respect for the Rights of Host Communities	All employees and managers of the Sustainability function, including Community Liaison Officers
Respect for Human Rights in the workplace	All employees and managers of the Human Resources and Organisation function and all Eni's employees responsible for supervising workers
Respect for Human Rights in the Supply Chains	All employees and managers of the Procurement function

Moreover, an online course on labour rights, structured on 12 modules and developed within IPIECA<sup>2</sup>, was promoted among Eni's employees and suppliers to raise awareness about responsible working conditions - including risks of modern slavery - and to facilitate understanding workers' rights, as well as how to identify, manage and mitigate the risks of non-compliance with such rights.

Eni has developed a Training Program on Security & Human Rights dedicated to Security Managers and Public and Private Security Forces both in Italy and abroad. In 2024 such training session was held in Mozambique<sup>3</sup>.

<sup>2</sup> The global oil and gas association for advancing environmental and social performance across the energy transition.

<sup>3</sup> Previous editions of the training program on security & human rights were held in: Iraq (2023), Nigeria (2022), Mexico (2021), Angola (2020), 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).

*Focus on***Security and Human Rights Workshop in Mozambique**

Since 2009, Eni has been promoting a training programme aimed at public and private security personnel in the Countries where it is present in order to disseminate corporate best practices in line with international principles. The targeted Countries are selected according to a rotation principle and in consideration of the risk level of the operating context.

In 2024, the 'Security & Human Rights' Workshop was held in Mozambique, in Maputo, with the participation of senior Mozambican civil and military officials, as well as representatives of a number of international organizations and companies, and in Pemba, with specific training sessions for private security operators working at Eni sites. The main objective was to promote human rights in security activities, sharing basic principles on the use of force and weapons to prevent violence, with particular attention to the protection of women. Overall, the workshop involved over 200 participants, 153 of whom were members of public and private security forces.

Eni has also developed material for subsidiary-led training initiatives for local Security managers willing to undertake autonomous training courses, which resulted in particularly relevant cases of emerging risks and/or with training needs due to job rotation. Eni's training program on Security and Human Rights has been recognized as a best practice in 'Responsible businesses advancing peace', the joint publication between the United Nations Global Compact and Principles for Responsible Investment (PRI).

To increase the number of security forces involved in specific human rights training, in addition to the annual course delivered by a specialized provider in one or more Countries, a project was launched in 2024 to conduct additional human rights training workshops for local security forces. The project kick-off took place in the ten Countries with the highest level of risk of human rights violations (according to the results of a risk-based model): Republic of Congo, Tunisia, Mexico, Côte d'Ivoire, Kenya, Iraq, Nigeria, Libya, Algeria and Egypt. This first edition involved 716 public and private security forces.

Eni also engages suppliers and companies in other awareness and development initiatives through Open-es, an alliance that joins together entrepreneurial, financial and associative networks, supporting all stakeholders on their sustainable development path through a digital and innovative platform. Today involving more than 28,000 companies and 30 partners, the initiative represents an inclusive and collaborative community with a virtuous commitment on ESG targets to support companies in measuring and improving their sustainable performances.





# Multi-stakeholder initiatives and collaborations for human rights

Eni builds long-term relationships with prominent human rights experts and organizations to achieve 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 2022, Eni became 'Full Corporate Member' of the Voluntary Principles Initiative, the multi-stakeholder initiative composed of Governments, international NGOs and companies, which promotes the implementation of a set of principles (Voluntary Principles on Security and Human Rights) aimed at supporting and guiding companies in addressing human rights risks in security activities. Eni continues its active participation in the initiative's works.

Besides being a member of the Human Rights Working Group of IPIECA, Eni participates in Working Groups focused on various topics with direct links to human rights issues, including the Working Groups on Social Responsibility, Supply Chains, Just Transition, Climate Change, Health, Water, Oil Spills and Biodiversity & Ecosystem Services.

In 2024, Eni signed a partnership agreement with the International Labour Organisation (ILO) in Kenya and Côte d'Ivoire to improve occupational health and safety (OHS) and ensure adequate access to social protection for smallholder farmers involved in agri-feedstock production to supply its biorefineries. This collaboration allows farm workers to benefit from awareness-raising activities, training and preventive measures to reduce workplace risks. The project is not limited to Kenya and Côte d'Ivoire but is set to expand to other African nations.

Since 2023, Eni participates through its subsidiary Eni Plenitude to the Solar Stewardship Initiative launched for the photovoltaic industry by the Solar Power Europe Association. This initiative drew together manufacturers, developers, installers, and buyers across the global solar value chain to promote responsible production, procurement and management of materials used to produce solar photovoltaics panels and equipment.

Since 2005, Eni participates to the Extractive Industries Transparency Initiative (EITI), the global initiative promoting responsible and transparent use of financial resources generated in the extractive sector, as a supporting company. In 2023, Eni was appointed as Board member of the EITI, the main decision-making body of the Initiative.

Eni has been an active contributor to the activities of the Institute for Human Rights and Business (IHRB), an independent organization that works as a global centre of excellence and expertise on the issue of relations between business and human rights. The IHRB engages directly with business leaders, representatives of governments and other stakeholders to evaluate the effectiveness of policies, operational practices and the initiatives of multiple relevant stakeholders on this important issue.

Moreover, Eni was the first Italian company to join the UN Global Compact and among the founding members of the World Business Council for Sustainable Development.

# Human Rights Due Diligence

The due diligence is set on an ongoing basis (not once-off) process, context-specific, risk-based and focuses on Eni’s salient human rights issues. The human rights due diligence model adopted by Eni, designed to be multidisciplinary and multilevel, follows a risk-based approach with the aim of identifying, preventing, mitigating and accounting for adverse corporate impacts on human rights.

**Multidisciplinary:** the analysis considers the social, health, environmental and legal aspects that could be possibly impacted.

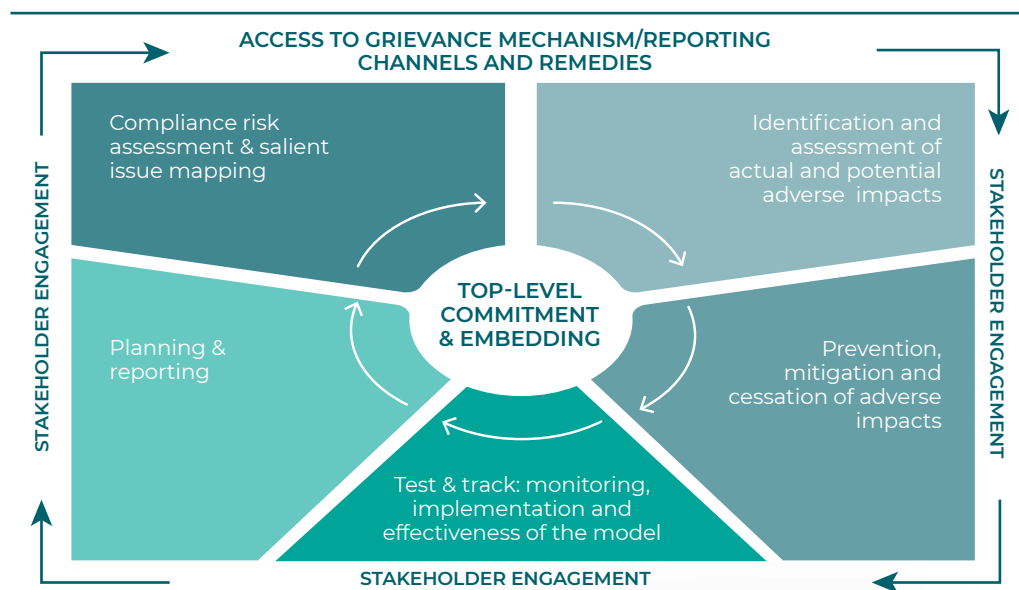
**Multilevel:** the analysis is consolidated at a central level, it takes into account Eni as a whole, and also at the level of each function/project, with a focus on the functions/projects that might be more exposed to the issue at hand and that are identified through a risk-based approach.

**Integrated** into Eni’s activities: from the initial stages of each project/activity, a weighted analysis is carried out according to specific criteria in order to determine its level of criticality.

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The model is based on the mapping of 'Salient Human Rights Issues' and the 'Compliance Risk Assessment'. Such assessments allow the identification of the potential risks or negative impacts that Eni's activities, products, services and business relations may cause, or contribute to causing. Once identified, such risks and impacts are managed by adequate safeguards according to a risk-based approach. These safeguards are translated into the definition and implementation of measures for the prevention, mitigation or management of risks and impacts, as well as the provision of remedy measures where the negative impact has occurred, nevertheless. The effectiveness of the model is ensured through periodic or specific monitoring of qualitative and quantitative indicators. Finally, planning and reporting activities are aimed at defining priorities and providing a summary view of activities and performances related to human rights. At all stages of the model's operation, a central role is played by the stakeholder engagement process, with the aim of gathering the view of stakeholders and shaping appropriate prevention and management measures. Constant and adequate access to grievance mechanisms/reporting channels, and the management of associated instances, facilitate the pursuit of needed remedy measures where there are established impacts and, more generally, the continuous improvement of the system.

See also: [Policy Respect for Human Rights in Eni](#)



# Salient Human Rights Issues

The salient human rights issues of a Company are those human rights that stand out because they are at risk of a more serious negative impact in view of the Company's activities or business relations. In identifying such rights, the perspective of risk to people, not to the Company, is used as a starting point, recognising at the same time that, where the risk to people's human rights is greatest, there is a strong convergence with the risk to the Company.

Eni's Salient Human Rights Issues, identified for the first time in 2017, were updated in 2024 in view of the evolution of business activities and the geographical contexts of operations. Eni's Salient Human Rights Issues, as resulting from this updating process, have been grouped according to the main categories of rights-holders: workers (both direct workers and those in the value chain), communities, and, for the first time, consumers. In addition to the most significant issues, a few 'emerging' issues were also identified during the new mapping process, concerning specific business segments, new activities or particular geographical contexts, which are subject to appropriate monitoring. Although not included among the salient issues, just transition has nevertheless been identified as a topic linked to the respect for human rights, given the potential negative impacts on the rights of workers, communities and consumers related to 'Transition-Out' activities, i.e. the closure or conversion of certain business sectors, and 'Transition-In', i.e. the development of new business, infrastructure and products.

## ENI'S SALIENT HUMAN RIGHTS ISSUES



The list of issues is the result of a structured process of internal dialogue, which involved also several authoritative stakeholders and allowed to identify the human rights issues at greatest risk in terms of probability and severity. This required<sup>4</sup> a series of dedicated workshops – facilitated by an external human rights expert – where over 100 people from different Eni corporate functions and Group's companies had the opportunity to discuss their view around the salient human rights issues of the company and other emerging issues, sharing their ideas to manage them within the overall model adopted by Eni. The results of the mapping were shared with all the participants, the senior management and the top management of Eni.

4 These include institutions, specialised think tanks, industry associations, civil society organizations and non-governmental organizations.



### Insights on human rights related to specific business activities

In consideration of the elements emerged from the process of updating Eni's salient human rights issues, specific analyses were conducted during 2024 on trading and shipping activities, in particular with reference to the purchase of biomass, and agri-feedstock activities to produce crops and vegetable oils for the production of biofuels.

These businesses, being based on the agricultural production of biomass, although they offer significant opportunities for agricultural development, are at the same time exposed to potential negative impacts, both in terms of working conditions experienced by the workforce involved in the supply chain of crops (e.g. informal employment and working hours, wages, forms of forced labour and child labour, violence and harassment, health and safety) and in terms of impacts on communities, specifically related to the proper use of land.

To manage such potential impacts properly, in the case of ETB – Eni's company responsible for trading and shipping activities – after mapping the current controls in trading and shipping activities, it was decided to strengthen the responsible sourcing principles and trader evaluation criteria for those considered to be at greater risk. Furthermore, in consideration of the specific aspects linked to maritime transport, an expansion of the checks is envisaged regarding the working conditions of crews.

With reference to agri-feedstock production activities, a specific framework has been put in place to oversee this new business area.

See also: [■ A framework for respecting human rights in agricultural activities](#)

## The Compliance Risk Assessment

During 2024, the first compliance risk assessment on the human rights area was completed. The activity – aimed at identifying risk activities (including management of own workforce, suppliers, customers, joint ventures, M&A, etc.), their risk-based evaluation and the identification of possible risk treatment actions – was carried out in synergy with the update of the salient human rights issues. The compliance risk assessment was conducted through the following phases: (i) the analysis of the external and internal regulatory context and identification of specific risk activities; (ii) evaluation of the 'inherent risk' exposure calculated according to specific indicators (such as Country risk and the number of salient issues) and the level of 'residual risk' on the basis of the existing mitigation measures (such as internal regulatory regulations, contractual clauses, training, etc.); (iii) the identification of action plans to strengthen/optimize existing mitigation measures, through a risk-based approach, and to inform the revision of the internal regulatory instruments.

The next three chapters describe how the due diligence is applied in a risk-based perspective considering the rightsholders mapped with the salient human rights issues:

See also: [■ Eni workers](#)

See also: [■ Workers in the value chain](#)

See also: [■ Communities](#)

Regarding consumers, it is a new area emerged from the updated map of Salient Human Rights Issues. There are already measures dedicated to consumers presented in the Sustainability Reports of Eni's companies having most of the relations with clients:

- [Plenitude](#)
- [Enilive](#)

# Eni Workers

Eni is committed to respecting and applying the principles set out in the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, which includes the fundamental rights on work enshrined in the ILO Declaration on Fundamental Principles and Rights at Work, as well as the rights set out in the international labour instruments for the promotion of decent working conditions.

## Assessing risks and impacts

Starting from 2020, a risk-based model was introduced for assessing the protection of human rights in the workplace aimed at segmenting Eni companies on the basis of quantitative and qualitative parameters that capture the specific characteristics and risks of the country/operating context and that relate to the human resources management process (including the fight against all forms of discrimination, gender equality, working conditions and freedom of association and collective bargaining). This approach identifies any areas of risk, or improvement, for which specific actions should be defined and monitored over time. The model is being progressively extended to Group companies, starting with those in the upstream business, which started to be affected by its application in 2021. A set of standard mitigation actions deriving from the application of this risk-based model for assessing the protection of human rights in the workplace has also been disseminated to all Eni subsidiaries.

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# Taking action

## INDUSTRIAL RELATIONS

A central role in building the relationship with workers and protecting their rights is represented by Eni's industrial relations model. In Italy, Eni involves its workers through the meetings provided by the INSIEME Protocol, such as the Strategic Committee, which deals with issues connected with, for example, the sale of business units, staff streamlining and generational turnover, reconversion of production sites and major organizational reviews (every six months or when necessary). A Bilateral Commission on Agile Work is also active, which verifies the application of the agreement on Agile Work, analyses its impacts on the organization of work, manages local critical issues and periodically reports the results to the signatory parties.

At European level, Eni established its European Works Council (EWC) in 1995, which focuses on issues relating to business plans/investments/acquisitions or disposals, employment prospects, occupational health and safety, environmental policies and sustainability. It includes representatives of Italian and European Eni workers, representatives of Italian trade unions, and a representative of the IndustriAll European Trade Union.

Moreover, the European Observatory on Workers' Health, Safety and Environment is where data, analysis and management tools on the following topics are shared: injuries, accidents and occupational diseases, regulatory evolutions, environmental and health aspects, monitoring of climate issues and energy efficiency.

In 2024, the annual meeting of the EWC and the European Observatory on Workers' Health, Safety and Environment was held, as well as the three annual meetings of the EWC Restricted Committee with the competent functions of Eni, including one at the Gela biorefinery.

Lastly, at global level, mention should be made of the Global Framework Agreement on International Industrial Relations and Corporate Social Responsibility (GFA), which is under renewal in 2025 and for which the usual global meeting was held in December 2024. The aim of such annual meeting between Eni and workers' representatives is to share information on sustainability issues, including human rights; it represents a key opportunity for a joint monitoring of Eni's capacity to respect workers' rights. The GFA calls for a delegation of 10 workers' representatives to participate, including 5 members of the Select Committee of the European Works Council and 5 workers' representatives from different Countries and business units of Eni.

The company disseminates the materials explained at the annual meeting. To ensure an ongoing social dialogue with the Company Management on issues pertaining to this Agreement, the role of the coordinator jointly designated by the Trade Union Organizations is established to represent a link between the delegates designated at the local level and the Labor Organizations signatory of this Agreement.



INITIATIVE	CONTENTS	SIGNATORIES
Global Framework Agreement on International Industrial Relations and Corporate Social Responsibility (GFA)	The Agreement represents a concrete commitment by Eni to steer sustainability guidelines, define strategies based on the principles of integrity and transparency, promote the fight against corruption, and uphold human rights, labour rights, health and safety, environmental protection and sustainable development. Annual meetings are held with Eni's international and European employee representatives, Italian trade union representatives and a representative from the IndustriALL Global Union. For each meeting, detailed documentation is shared and a formal report is drafted and signed by both parties, outlining the matters discussed and agreed.	Eni, IndustriALL Global Union and trade unions Fildtem Cgil, Femca Cisl, Uiltec Uil
INSIEME Protocol	Among the tools to achieve the engagement of workers with reference to matters related to sustainable transition. The agreement establishes the birth of a new model of industrial relations, to effectively accompany the transformation processes and to share a Generational Pact that allows the renewal and updating of professional skills and the construction, together with the stakeholders, of a clear regulatory framework, favourable to investment and able to combine economic-financial sustainability with environmental and social sustainability..	Eni, Trade Unions
NOI - Protocol initiatives and service for the well-being of Eni people	Initiatives and services for well-being through the enhancement of interventions in the areas of health, social security, income support, housing and family management to seek a proper balance of work activities with an increasingly attentive approach to the personal and social sphere. The aim of the Protocol is to make Eni's welfare offer evolves in line with the changed external context and the new needs of the corporate population, updating and improving the basket of services, initiatives and tools to improve the quality of work and life of employees and their families, making them easier to access and more equitable throughout the territory. The Welfare Enhancement Plan included interventions in the areas of health, social security, income support, housing and family management support.	Eni, Trade Unions

83,5% of Eni' workers are covered by Collective Agreements: 100% in Italy, in accordance with current regulations; abroad, this percentage stands at 40.1%, depending on the specific regulations in force in the individual countries where Eni is present. In countries where employees are not covered by collective bargaining, Eni ensures full compliance with applicable international and local legislation, as well as the adoption of higher protection standards, ensured through the application of its company policies worldwide.

### MINIMUM WAGES

In the Countries where it operates, Eni guarantees its people the application of fair and competitive remuneration policies with respect to their roles and professional skills, which are also aimed to ensure a decent standard of living, well above mere subsistence levels, legal/contractual minimums in force locally, as well as minimum remuneration levels found in the local market.

In each country Eni applies references wage policies that are well above the legal/contractual minimums, as well as the first decile of the local wage market, and annually verifies the salary positioning of its people, taking any corrective actions. The references that Eni uses for such comparison are the minimums established by law or by contract in each Country and the market minimums of medium/large local companies, which are well above the poverty thresholds established by Eurostat for the European Union and by Wage Indicator for other Countries.



## PAY RATIO WITH LEGAL AND MARKET MINIMUM WAGES



a) Ratio refers to fixed and variable remuneration of blue collars or white collars for Countries where Eni has no blue collars (market data from Korn Ferry).

b) Minimum salaries as defined by law in the various Countries or, if not applicable, in national collective bargaining agreements.

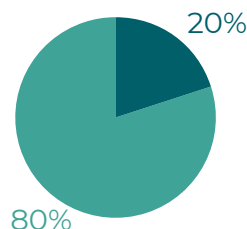
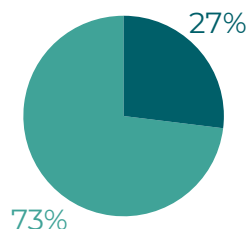
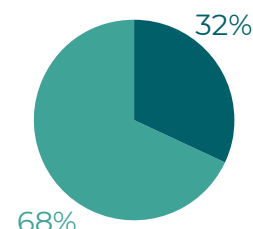
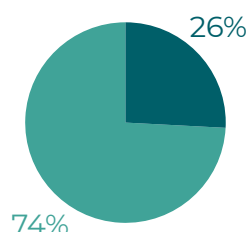
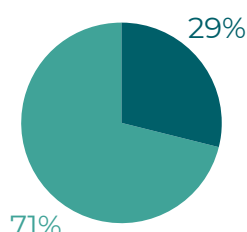
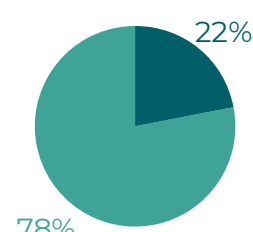
See also: [Report on the 2025 Remuneration Policy and remuneration paid 2024](#)

## GENDER PAY GAP

Eni's commitment to eliminating the gender pay gap translates into an integrated approach based on both dedicated remuneration actions and broader initiatives aimed at supporting women in accessing job opportunities and career paths.

The global Gender Pay Gap at Eni is +6.8%. The increase compared to 2023 is the result of the acquisition/divestment of foreign companies and can be influenced by objective and non-discriminatory factors and not considered by the indicator, such as: level of professional category and role held, seniority in the role, working hours and conditions (e.g. shifts and related allowances), individual performances, as well as the number and distribution of the female population in the different countries and professional categories compared to the male population. Therefore, Eni carries out further analyses, the objective factors mentioned above being equal, to highlight any unjustified gaps and take appropriate corrective actions. In 2024 the analysis at the same level of role/seniority showed a global average pay gap of 2.1%.

In the following graphs, the overall presence of women is analysed according to decreasing salary levels represented by the statistical practices of ninth decile, third quartile, median and first quartile. In particular, compared to an overall female presence in Eni of 28.3%, there is a lower presence in the lowest salary levels (below the first decile, equal to 22%) and in the highest salary levels (above the ninth decile, equal to 20%).

% remunerations higher than 9<sup>th</sup> decile% remunerations higher than 3<sup>rd</sup> quartile% remunerations between 3<sup>rd</sup> quartile and median% remunerations between median and 1<sup>st</sup> quartile% remunerations lower than 1<sup>st</sup> quartile% remunerations lower than 1<sup>st</sup> decile

■ Women ■ Men

## DIVERSITY, INCLUSION AND GENDER EQUITY

The principle of inclusion is a cornerstone of our vision and is reflected in the creation of a workplace based on **equal opportunities**.

Eni is committed to continuously improving our ability to integrate **women's perspective** into different processes and areas. Eni endorsement of the **United Nations' Women Empowerment Principles (WEP)** confirms the commitment to gender equality and women's empowerment in the workplace, in business practices and society. The percentage of women in non-managerial positions in 2024 stands at 27.5% compared to 26.5% in the previous year. In 2024, the percentage of second level women managers reporting to the CEO is 51% of the total. Eni monitors data on the presence of women in the company's various functions.

See also on Female Empowerment: [Eni for 2024 - A Just Transition](#)

Eni's approach to Diversity & Inclusion (D&I) is based on specific reference principles and commitments made by Eni, such as 'Enhancement of Diversity', through which Eni is committed to the recognition and respect of individual characteristics; 'Equity', which guarantees equal opportunities and access to company resources and opportunities; 'Uniqueness', which enhances the peculiarities of each person through listening and inclusion; and 'Inclusiveness', which fosters an open, collaborative work environment based on the values of transparency, sustainability and listening. In 2024, a communication plan was also implemented to disseminate the Policy D&I among employees in operational contexts in Italy and abroad. The D&I Policy was also adopted by Eni's companies and subsidiaries abroad as required by Eni's regulatory system.

See also on Diversity and Inclusion: [Eni for 2024 - A Just Transition](#)

With reference to parenting issues, in all Countries of presence, Eni has continued to recognize 10 working days paid at 100% to both parents, a minimum of 14 weeks of leave for the primary carer as per ILO convention and payment of an indemnity equal to at least 2/3 of the salary received in the previous period. In addition, at least 80% of Eni's local workforce is based in countries whose legal framework provides for a fully paid maternity leave of at least 12 weeks.

See also on Welfare: [Eni for 2024 - A Just Transition](#)

## OCCUPATIONAL AND PROCESS SAFETY

Eni constantly invests to ensure safety in the workplace, particularly in the development of models and tools for risk assessment and management and in the promotion of a safety culture, to pursue its commitment to zero accidents and safeguarding the assets integrity. To prevent accidents, in addition to the continuous

updating of the HSE documentary and regulatory system, initiatives have been introduced to strengthen the skills and involvement of employees and contractors in the HSE field (Safety Leadership courses, technical and behavioural HSE Coaching programmes, promotion of the Safety Golden Rules and Principles, application of the Stop Work Authority), as well as new IT applications and digital technologies to support HSE processes and operational safety.

For risk mitigation and management, a risk-based safety management system is in place to prevent injuries and major accidents. All accidental events, including near misses and unsafe conditions/unsafe acts are reported, analysed and monitored with the necessary corrective and preventive actions. This system is continuously improved, considering events occurring in Eni's operations and in the industry. All companies at significant risk are either covered by ISO 45001 and 14001 certification or have planned to achieve it.

See also: [Eni for 2024 - A Just Transition](#)

## PEOPLE'S HEALTH

Eni's Health Management System is implemented in all operations, covering the entire Eni population, and includes the activities of Occupational Medicine, Occupational Hygiene, Traveller's Medicine, Medical assistance and Emergency, Health Promotion and Community Health Protection and Promotion.

It is a management based on the principles of precaution, prevention and promotion and is implemented with a view to continuous improvement. Proper risk management is ensured through the constant updating of health profile assessments of countries where Eni is present, including the evaluation of possible epidemic outbreaks, the assessment of health risks arising from work activities and potential health impacts arising from industrial processes, also considering the expectations of stakeholders and communities. Eni acts in accordance with local regulations and the highest international standards and ensures continuous updating of personnel skills.

See also: [Eni for 2024 - A Just Transition](#)

## Case Study

### Eni's strategy to prevent and combat violence against women

Eni is committed to the issue of combating violence against women, in line with its commitment to contribute to the achievement of the Sustainable Development Goals (SDGs) of the United Nations **2030 Agenda (SDG 5, 'Achieving gender equality and empowerment of all women and girls', Target 5.2)**. Since 2020, the Company has joined the UN's **'16 Days of activism' (Orange the World)** campaign every year to mark the International Day against Violence against Women and Girls. In 2021, Eni published the [Zero Tolerance Policy against harassment and violence in the workplace](#), in line with international standards and the Company's mission and Code of Ethics, and signed up to the **UN Women Empowerment Principles (WEPs)** and the UN Global Compact.

In 2024, Eni defined an **overall strategy for preventing and combating gender-based violence**, and launched a cross-functional **working group** that includes more than 30 initiatives for preventing and combating different forms of violence against women, inside and outside the workplace. Thus, new actions were identified and implemented in addition to those already consolidated (including: the reporting channel and the harassment and violence at work helpline, the psychological support service, specialised training for employees working at the reporting channel, harassment monitoring, integration of the topic in impact assessments, consultations with and training to security forces).

Some examples of the new initiatives implemented are given below.

#### FOR THE RISK OF VIOLENCE AGAINST ENI EMPLOYEES IN THE WORKPLACE OR DURING WORK ACTIVITIES

New initiatives implemented:

- internal communication campaign to reiterate Eni's commitment to adequately handle reports to the Zero Tolerance Policy channel and to take necessary action;
- raising awareness of travel facilities on certain measures to be taken to prevent gender-based violence and on post-transfer surveys.

#### FOR THE RISK OF VIOLENCE AGAINST ENI EMPLOYEES OUTSIDE OF WORK

New initiatives implemented:

- provision of a package of support measures through management, economic and logistical tools;
- awareness-raising webinar for the human resources professional area and for all Eni people in Italy on how to recognize signs of violence and the package of measures that can be activated (in cooperation with Fondazione Libellula).

#### FOR THE RISK OF VIOLENCE AGAINST WOMEN IN THE COMMUNITIES WHERE ENI OPERATES

New initiatives implemented:

- a project in cooperation with the Ravenna anti-violence center, which allowed 20 children (of women supported by the center) access to recreation centers during the summer and included an awareness-raising event involving about 200 Eni employees (partnership with the Linea Rosa Association);
- a practical guide called 'Ti riguarda' (It concerns you) on violence against women and raising awareness targeted at operators of 2,700 stations on how to provide adequate information and support to women victims of violence (Enilive's partnership with DonnEXstrada);
- sponsorship of a free screening initiative for women victims of violence by Fondazione Onda;
- awareness-raising campaigns on forms of violence against women, with a focus on economic violence (Plenitude's partnership with Olimpia Milano).

*Focus on*

## The engagement of the Unions and workers' representatives within EWC and GFA

In 2024, the annual meeting of the EWC and the European Observatory on Workers' Health, Safety and Environment was held, as well as the three annual meetings of the EWC Select Committee with the competent functions of Eni. These last three were respectively held in Enilive Headquarters, Gela Bio Biorefinery and Eni's Headquarters in Castel Gandolfo. Participating to each Select meeting, on the union side, were the coordinator and the 4 delegates (two Italians, one Greek and one German).

Held in summer 2024, the annual European Works Council meeting opened with an illustration of Eni's Strategic Plan 2024-2027, followed by a specific focus on the main employment dynamics. Eni's transformation path was presented, with specific focus on transition technologies such as magnetic fusion, CCS, renewable sources, biofuels and sustainable chemistry. The company presentations were followed by a debate between employee representatives and company representatives, in which there was an opportunity to discuss the data presented. In the speeches made by the representatives of the Filctem-Femca-Uiltec general and national secretariats, the Senior Policy Advisor of industriAll and the Industrial Relations Manager of Eni highlighted the importance of a participatory industrial relations model and the importance of constant dialogue in the light of the transformation process underway in an energy transition perspective. The meeting was the occasion also to provide training according to the Eni EWC agreement: a module was about Eni's approach to D&I issues, presenting the mission, the new reference Policy (Policy ECG Diversity & Inclusion) and how it is implemented in foreign subsidiaries; another module analysed the European Institutions with particular regard to the European Commission, its composition and renewal methods, as well as the role of the social partners.

Concerning the European Observatory on Workers' Health, Safety and Environment meeting, held in conjunction with the annual EWC meeting, performance and main initiatives on Safety and Environment and then on Health were illustrated. Different Eni business lines presented the challenges and opportunities in the fields of Health, Safety and Environment. This analysis led to strengthening the culture of health and safety as an indispensable value among employees, contractors, suppliers and local stakeholders. In this context, the adoption of models and tools for risk assessment and management was fundamental, prioritising prevention over protection, and promoting virtuous and conscious behaviour to reduce accidents to zero.

The three EWC Select Meeting focused, respectively on:

- Enilive business and the new challenges of mobility, the situation of Versalis with regard to the Grangemouth site where the collective consultation process was concluded and an agreement between employers, trade unions and workers was signed. Moreover, Eni's representatives gave an update on the proposal to amend Directive 2009/38 on European Works Councils, and the parties reflected on the new opportunities for EWCs in the context of Just Transition initiatives.
- Gela biorefinery's business, its history and its prospects followed by the presentation of the Cassiopea project, including a visit of the biorefinery. Moreover, the reorganization that affected Eni back in September 2024 was presented. Moreover, at the request of the Select Committee, Versalis' representatives presented the current situation in the chemical industry and the reconversion of some sites such as Priolo into a biorefinery.
- A round-table discussion during which each delegate presented the topics to be taken into consideration for next year's meetings. Versalis' representatives shared an update on the current situation of the Chemical Business, as requested by the trade unions. The Coordinator expressed his satisfaction with the climate of cooperation in which the works of the year were carried out.

The last plenary meeting of 2024 was the Global Framework Agreement, held in December, where the National Secretaries of Filctem-Femca-Uiltec, the Director Energy Industry and Just Transition of IndustriALL Global Union and the GFA Coordinator participated. Eni's Strategic Plan 2024-2027 was presented, followed by a specific focus on the performance of GFA indicators for the year 2023. The meeting has been also the occasion to present the CSRD Directive. During the meeting some points for renewal of the GFA currently under negotiation were presented, along with the main one of novelty regarding the transposition of company policies and ILO regulations. In particular, the new ECG Policy Respect for Human Rights in Eni was also presented. A broad discussion was held both on the data presented and on the text of the GFA through interventions by the delegates. The parties agreed on the importance of continuing on the path of social dialogue through the instrument under negotiation.



# Key Performance Indicators

		2023	2024
Employees covered by collective bargaining	(number)	28,391	26,631
	(%)	83.50	86.95
Italy <sup>(a)</sup>		100	100
Abroad		40.10	56.28
Consultations, negotiations with trade unions on organizational changes	(number)	107	102
Employees in trade unions		10,443	9,775

(a) Within the European Economic Area, only Italy is considered as it is identified as the only Country in which Eni operates that has at least 50 employees and represent at least 10% of the total number of workers.

		2023	2024
Women employees in service	(%)	27.38	28.34
Women hired		39.15	43.62
Women in positions of responsibility (managers and middle managers)		29.22	30.06
Women senior managers		18.17	18.68
Women middle managers		30.34	31.20
Women white collars		30.77	31.06
Women blue collars		15.10	17.12
<b>Promotions from Employee to Middle Management and from Middle Management to Executive by Gender</b>	(%)		
Women		36.07	32.62
Men		63.93	67.38

		2023	2024
<b>Employees who have taken parental leave</b>	(number)	945	1,010
Of which men		619	655
Of which women		326	355
<b>Rate of return to work after parental leave<sup>(a)</sup></b>	(%)	92.91	105.15
Of which men		97.58	103.21
Of which women		84.05	108.73
<b>Smart Working<sup>(b)</sup></b>	(number)	11,544	12,465
Of which men		6,924	7,429
Of which women		4,620	5,036
<b>Employees who received care benefits<sup>(c)</sup></b>	(number)	1,938	1,967
<b>Absenteeism rate<sup>(d)</sup></b>	(%)		
Women		2.75	2.66
Men		2.95	2.77

(a) Employees who returned from leave after using it. The figure may exceed 100% because it includes both users at the end of 2023 and users in 2024.

(b) Italian Smart Working personnel registered in the HR system as at 31.12.2024.

(c) Number of resources that have used L.104/1992 leave for family members.

(d) The figure relates to staff in Italy. For the calculation of the absenteeism rate, only absences caused by accident and illness were counted, excluding holidays, leave and absences.

		2023	2024
Total recordable injuries (employees and contractors)	(number)	93	106
Total Recordable Injury Frequency Rate (TRIR) <sup>(a)</sup> index	(total recordable injuries/worked hours) x 1,000,000	0.57	0.67
Italy		0.80	1.09
Abroad		0.41	0.36
Lost time Injury frequency rate (LTIF)	(accidents with days of absence/worked hours) x 1,000,000	0.41	0.53
Employees		0.54	0.62
Contractors		0.33	0.49
Fatality index (employees and contractors)	(fatalities/worked hours) x 100,000,000	0.61	3.17
Number of fatalities as a result of work-related injury (employees and contractors)	(number)	1	5

(a) In 2024 the Total Recordable Injury Frequency Rate (TRIR) increased compared to 2023 for both contractors and employees since the decrease in worked hours during the period was not matched by a reduction in the number of total recordable injuries, which rose to 67 for contractors (54 in 2023) and remained stable at 39 for employees. Five fatal accidents were recorded for contractors in Italy related with the accident that occurred on December 9, 2024 at the fuel depot in Calenzano (Florence). Investigations by the Judicial Authorities on the dynamics and causes of the event are still in progress; Eni is providing the widest possible cooperation with respect to any possible investigative needs. The fatality index of the contractors rose to 4.96, while that of the employees remained zero.

# Workers in the value chain

This section provides an overview of how Eni engages the third parties in its value chain to prevent and mitigate the adverse human rights impacts that their operations, products, or services might cause, or contribute to causing (or that they might be directly linked to) to their workers.

As to the supply chain, Eni conceives respect for human rights as a sensitive element and it addresses it through a procurement process that entails the adoption of an assessment model with a focus on human rights.

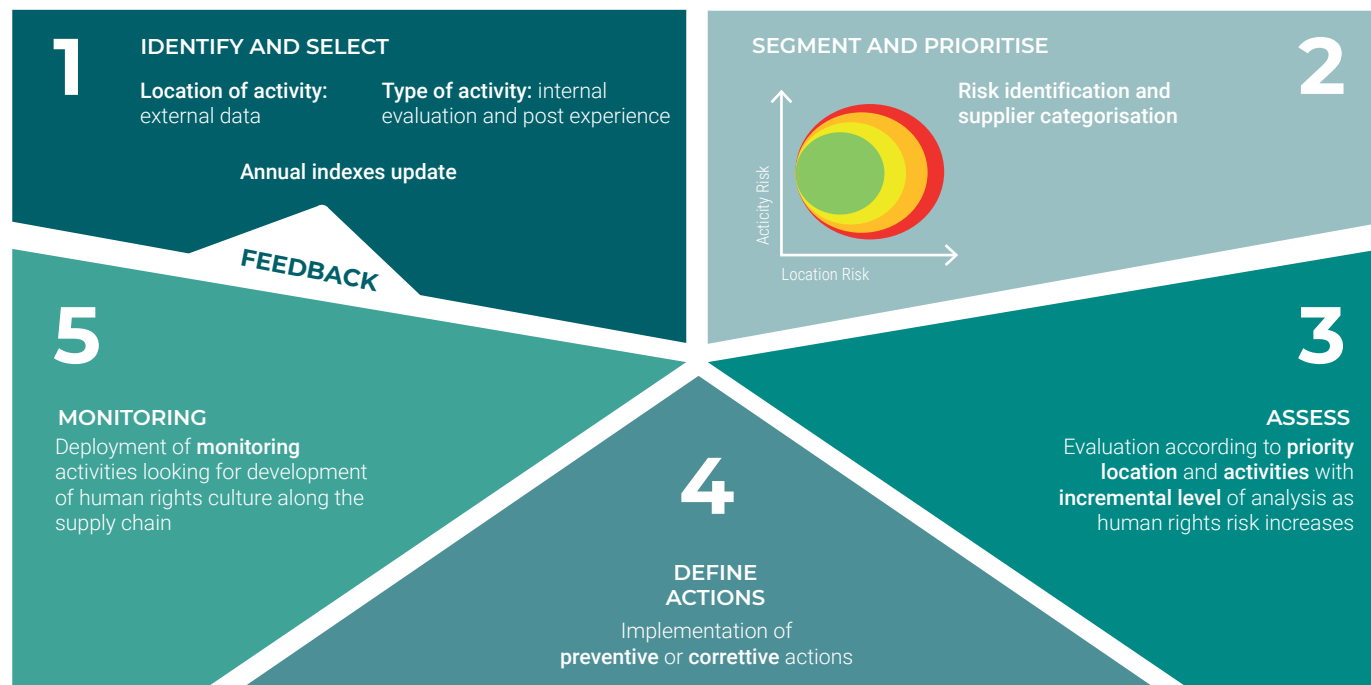
## Assessing risks and impacts

As to the procurement activities, Eni applies a human rights risk-based model through which suppliers are analysed and classified according to a combination of the inherent risks of the operating Countries and the activities performed. The Country risk is detected by using a specialised provider, the risk associated with the activities is evaluated considering factors such as labour intensity, required skill levels and risks related to health, safety and the environment.

The model outlines differentiated control methods related to the different risk levels: the higher the risk of negative impacts on human rights – modern slavery, forced labour, health and safety, discrimination, working conditions (wages, working-hours, accommodation), freedom of association and collective bargaining, child labour, etc. – the more detailed and demanding is the assessment and the measure to be undertaken in case of gap or weaknesses. The assessment considers the principles set by the international standard SA8000.

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## ENIS' APPROACH TO ASSESS AND MANAGE RISKS ALONG THE SUPPLY CHAIN



The assessment model is applied at all phases of the procurement process, involving all the functions that interact with suppliers, such as the qualification, sourcing and contract management teams.

In certain high-risk geographies there are workers who may be considered more vulnerable and exposed to risk of forced labour, modern slavery or child labour – such as migrant workers, those working in remote areas or belonging to minority groups. According to the results of the adopted risk model, highly labour-intensive activities (such as maintenance, construction, logistics, cleaning, catering, and security) have been classified at high-risk in terms of potential negative human rights impacts.

Here follows some valuable sample of activities carried out to by Eni to enhance the respect of rights for workers of Eni's suppliers (particularly those who works in Eni's operating sites) as well as, in the broader value chain perspective, the workers of Eni business partners, also in JVs.

See also: [Annual Report](#) and [Slavery and Human Trafficking Statement](#)



# Taking action

By applying the risk-based model, during 2024, more than 1,000 in-depth human rights evaluations were carried out through documental and on field audits, more than double the number of audits performed in 2023.

The audits identified areas for improvement in approximately 50% of the cases. These gaps have been addressed in collaboration with suppliers by providing them with the necessary tools and support to foster their development. Such areas of improvement, related mainly to the management of human rights along the value chain, reflect the different dimension of the companies involved in the assessment and consequently their governance maturity on these aspects. Suppliers that have shown shortcomings have been limited from participating in Eni tenders and corrective action plans have been agreed with them to ensure respect for human rights.

## THE MEASURES DEDICATED TO SUPPLIERS

To become or maintain the status of Eni's supplier, all companies that are willing to collaborate with Eni are requested to undersign the **Supplier Code of Conduct**, which is based on social responsibility's principles and human rights requirements. The Supplier Code of Conduct represents a commitment in recognising and protecting the value of all its own people, operating with integrity, protecting company resources, promoting the adoption of such principles to their own workforce and supply chain.

Regardless of the level of risk associated, checks through open sources are also carried out to identify potential involvement of suppliers in human rights violations, as well as periodic qualification checks, based on performance indicators, documental analysis or dedicated on-field audits and questionnaires, depending on the level of risk (lower risks suppliers have to fill-in self-assessment questionnaire, higher risks suppliers may be audited), in order to assess suppliers' performances and seize potential issue to be managed.

During the tender phase, minimum requirements on human rights are requested and assessed, especially in the case of activities with a potential significant risk.

During the execution of the contract, Eni assesses and monitors contractors through feedback and documental verifications with the aim of preventing impacts related to forms of modern slavery or forced labour, child labour, wage discrimination, contribution irregularities and other aspects connected with the potential negative impacts that may be generated on workers. In the event of critical issues, improvement plans are defined with a focus on respect for human rights with the request for the implementation of specific actions and remedies. If the minimum requirements of acceptability are not met, participation in tenders is inhibited; in the most serious cases of non-compliance, the relationship with the supplier is interrupted, and it is excluded from Eni's vendors list.

## ENGAGEMENT AND RAISING AWARENESS

Eni has developed a sustainable supply chain management strategy based on collaboration and shared values with its suppliers. The strategy is based on three main pillars: (i) the systemic and inclusive approach; (ii) the development and valorisation of best practices; (iii) the integration of ESG principles at every stage of the procurement process.

The inclusive approach aims to engage all Eni suppliers in a path of improvement and sustainable development by sharing common goals and adopting differentiated solutions according to the ESG maturity of individual companies. Eni aims to progressively strengthen sustainable supply chain management further by providing tools that enable suppliers to adopt and replicate the Eni model. An example of this commitment is the [Open-es](#) initiative, launched by Eni in 2021, which to date brings together more than 30 partners including large industrial companies, financial institutions and associations. This initiative aims to support companies in measuring and improving their ESG performance, with more than 28,000 companies taking part, of which around 7,000 are linked to the Eni supply chain.

See also: [Eni for 2024 - A Just Transition](#)



Eni organizes workshops, training sessions and awareness-raising moments where suppliers can discuss ESG issues with experts, including those related to respect for human rights in the supply chain. Eni also promotes knowledge of human rights safeguards through employee training programs and workshops aimed at professionals involved in the management of suppliers of foreign companies.

During 2024, as part of the Open-es initiatives, in addition to organizing workshops for suppliers focused on training and raising awareness on human rights protection, a new feature was released on the platform to enable suppliers (and all companies in the community) to perform a self-assessment on their human rights management practices. By providing the information requested, companies receive feedback on their positioning and some useful ideas and suggestions on the actions to be taken to improve. All these actions are part of the broader support to suppliers in fulfilling the various ESG requirements, providing tools to support the sustainable development path and more generally the competitiveness of their business.

See also: [the Case Study 'Open-es Human Rights Card'](#)

## THE MEASURES DEDICATE TO THE OTHER BUSINESS PARTNERS

Eni takes into consideration, with a risk-based approach, the potential adverse human rights impacts stemming from the activities of companies and entities (such as joint ventures, consortia, etc.) in which, respectively, it holds a minority share or is not predominantly involved in managing operations (so-called non-operated). In turn, Eni expects these entities to commit to and observe the principles set out in the Policy 'Respect for Human Rights in Eni', and the specific commitments Eni has made. As a matter of fact, Eni undertakes to use its influence, on a risk-based perspective and insofar as reasonable according to the circumstances, to exercise leverage toward the business partners on human rights matters.

Eni has adopted formal rules to ensure that the Code of the joint venture is aligned with Eni's. In addition to these contractual measures, there are training initiatives dedicated to business partners to ensure the continuous dissemination of the principles of the Code of Ethics. Clauses on compliance with the Code of Ethics are also included in agreements with joint venture partners, including national oil companies.

To integrate human rights into the preliminary stages of business, Eni has introduced a specific clause to be negotiated and applied to new joint venture agreements and new oil contracts with State's authorities and government bodies. This clause requires partners to fulfil their obligations in compliance with key international human rights standards and in accordance with the UN Guiding Principles on Business and Human Rights. In the event of divergences, Eni commits with its partners to identify potential areas for discussion and agree on the final text.

The negotiation aims at: (i) including a commitment to respect and promote human rights, in particular towards human resources, procurement, HSE, security, local communities and for access to remedies, leveraging this inclusion to obtain a mutual obligation from the host country; (ii) committing to promote the organization of training and awareness campaigns on human rights with the participation of local staff, suppliers and local communities.

There are two main ways of monitoring in this area: (i) before the constitution of a joint venture, an M&A transaction or a sale or purchase of exploration titles, an analysis of the potential extractive commercial partner is done to verify, through open-source controls, the existence of critical human rights issues related to these counterparties; (ii) an annual monitoring programme of compliance with the human rights clause in the Joint Operating Agreements and oil contracts, in order to identify cases of full, partial or non-implementation and possibly highlight areas for improvement. 100% of oil & gas business partners were checked according to this procedure. If warning signs emerge from business partners regarding human rights, Eni takes appropriate measures towards the partner.

It is worth to highlight that the human rights due diligence on the business partner is an evolving topic, for instance, in terms of regulatory framework and practices: Eni monitors the relevant sources' developments with the view of a continuous improvement guided by a risk-based approach.

*Focus on***Managing human rights issues with business partners in Upstream O&G**

To properly manage the human rights issues with the business partners, an approach shared by several departments is necessary to be sure that issues are considered from the bid phase to day-to-day operations. The Compliance Department supports the negotiators during the bid phase to ensure that human rights are included into the petroleum contracts and joint ventures agreements, via a specific human rights clause drafted according to the UNGPs. Once the Petroleum Contract is signed and joint venture is formed, the Eni's subsidiary – as counterpart of the Petroleum Contract and part of the JV – is responsible for managing all the issues referred to the operations, including those ones carried out through JVA, with the support of the Sustainability Department, when needed and as reasonably appropriate according to the circumstances. Therefore, both local subsidiaries and Sustainability Department oversee the human rights issues with its extractive business partners, exerting Eni's leverage when needed. Further, Eni has extended the industrial risk-based model to Non-Operated Assets, prioritizing both industrial projects and business partners based on the potential human rights risk.

**RESPONSIBLE CONTRACTING**

Eni's counterparties are bound by a contractual obligation to comply with the principles contained in applicable national and international laws and instruments, guidelines and best practices aimed at preventing violations of Human Rights, including the UNGPs, the OECD Guidelines and the ILO Declaration on Fundamental Principles and Rights at Work, as well as Eni's Code of Ethics and Supplier Code of Conduct. In the event that critical issues arise or that the minimum standards of acceptability are not fulfilled, Eni limits or prevents the supplier's ability to bid for tenders and/or evaluates whether to adopt measures against the supplier, including the termination of the contract.

Moreover, in line with the principles of 'responsible contracting' suggested by the best practices and international guidelines on business & human rights, Eni has implemented a system of standard clauses on human rights – on a risk-based approach – for specific types of contracts that it enters. These clauses, which can be supplemented and adapted to each case, are classified according to the type of counterparty and contractual case: (i) light (referring mainly to preliminary agreements and with public counterparties); (ii) medium (referring to commodity contracts, consultancy contracts and active supply contracts); (iii) elaborate (referring to passive supply contracts or complex transactions such as M&A). Standard clauses are not applied, however, in an automated manner; on the contrary, they require a case-by-case assessment from the relevant unit within the Integrated Compliance Function, in presence of complex indicators such as: a) initiatives with potential impacts on local/indigenous communities and/or requiring their involvement; b) initiatives with specific risk areas such as social projects, joint venture agreements and forestry or agri-business agreements.

*Focus on***Sale of NAOC to Oando PLC**

In 2024, Eni completed the sale of Nigerian Agip Oil Company Ltd (NAOC) to Oando PLC, Nigeria's leading energy Company (whose shares are listed in both Lagos and Johannesburg). A transfer that was supported by the Nigerian government as part of a policy to increase the involvement of local companies in the management of onshore assets, leveraging the local expertise acquired over time and, in this specific case, Oando's role as a partner in the NAOC JV since 2014. The sale was preceded by an in-depth assessment of Oando's financial and operational capabilities, conducted by Eni and, most recently, verified by the Nigerian Upstream Petroleum Regulatory Commission (NUPRC), which recognised Oando as a responsible operator in the local market capable of fulfilling its role in compliance with applicable regulations, both in terms of safety and environmental compliance. The transaction was structured to facilitate continuity in the conduct of business, retaining the same personnel, suppliers and operating tools. The sale of NAOC took place in compliance with the Petroleum Industry Act (PIA), introduced in 2021 by the Nigerian government to regulate roles and responsibilities for the decommissioning and abandonment of oil and gas sector sites, with a focus on environmental sustainability and community involvement. In accordance with the PIA, a Decommissioning & Abandonment Plan was prepared prior to the divestment, reviewed and approved by NUPRC with the support of independent experts. At the date of the sale, Eni has remediated and cleaned up 100% of the spills attributed to NAOC (with the exception of the sites temporarily not accessible for security reasons), as verified and certified by joint inspections with the competent authorities (the PCI - Post Clean-up Inspections aimed at confirming the successful remediation of the sites are carried out jointly by representatives of the National Oil Spill Detection and Response Agency - NOSDRA, the local community, NUPRC and the operator).

## Case Study

## Open-es Human Rights Card

The responsibility of lead companies in ensuring respect for human rights throughout the supply chain is becoming increasingly central; in this context, equipping oneself with practical, scalable, and concrete tools is essential to prevent risks and strengthen due diligence.

In this regard, Eni has collaborated, within the framework of the Open-es system alliance, in the development of the Human Rights Card: a digital self-assessment tool that is simple and intuitive, designed to measure the level of human rights oversight by companies. The card is based on a questionnaire structured across 10 thematic areas—from child labor to freedom of association—and refers to key international standards such as SA8000.

In 2024, Eni adopted the Card within its risk-based model, using it to assess the position of its suppliers—both in Italy and abroad—on human rights management. Thanks to this tool, over a thousand companies were involved in an assessment, selected based on risk criteria. By completing the Card directly on the Open-es platform, suppliers underwent a documentary evaluation that provided a clear and immediate overview of their strengths and areas for improvement.

Based on the outcomes, Eni initiated proportionate and targeted actions: improvement plans, feedback activities, on-site audits, and training initiatives. Designed to be scalable, the tool was also indicated as a lever to support suppliers themselves, enabling them to extend oversight to their own partners and generate a cascading effect throughout the value chain.

This approach fits perfectly into Eni's responsible supply chain management strategy, which promotes a systemic, inclusive, and participatory approach to social issues, including human rights.

## Key Performance Indicators<sup>(a)</sup>

		2024
Procurement spending for goods, works and services	(billion euros)	19.8
Contract awarded by procurement departments worldwide	(number)	17,111
N° suppliers involved in awareness, measurement and collaboration initiatives on ESG topics	(number)	7,512
% of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics	(%)	70
% of the value of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics		82

(a) The data are only available for 2024, as new indicators monitored from this year.

# Communities

Eni respects the rights of individuals and local communities of the Countries where it operates, with particular reference to the rights to ownership and use of land and natural resources, the safeguard of culturally sensitive areas, the environmental protection, the biodiversity, the right to water and the right to the enjoyment of the highest attainable standard of physical and mental health. Eni does not tolerate any form of land grabbing and operates according to advanced criteria of environmental and public safety protection.

Special attention is given to the rights of vulnerable groups, with a particular focus on children, national or ethnic minorities, religious and language minorities, people with disabilities, migrant workers and their families. Eni is committed to respecting the rights of women and girls in the communities where it operates and verifies the presence of indigenous people in the area impacted by the relevant projects, ensuring their effective engagement for the entire duration of the operations, including through the use of external specialist services and of the technical assistance of Eni’s sustainability function.

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# Assessing risks and impacts

Eni adopts a series of tools and methodologies to identify impacts, direct and indirect, on communities from the early stages of new business activities, with the aim of preventing and mitigating them, as well as promoting development. Here follows some valuable sample.

For every new Country of operation a specific analysis is carried out to understand the challenges the country faces and the implication for Eni, including a specific screening over human rights issues. Moreover, the risks associated with the already operating countries are assessed by the Integrated Country Risk – an analysis which combines information from specialised data providers and internal evaluation – which is performed every six months as part of the Integrated Risk Management model.

To specifically assess potential human rights impacts associated with the business projects, starting in 2018, Eni adopted a risk-based prioritisation model that classifies projects according to their potential impacts. The model considers a mix of parameters connected to the operating context, such as 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 subject to specific in-depth analysis through dedicated studies, such as 'Human Rights Impact Assessment' (HRIA), aimed at identifying and assessing – also through the engagement of rightsholders – potential impacts and defining recommendations to be translated into prevention and management measures within Action Plans.

The HRIA methodology entails a preliminary analysis of scoping, based on studies, research, statistical data available, and remote interviews, and a field visit where rightsholders (communities, workers, both direct employees and sub-contractors) are consulted during dedicated meetings. When needed, focus groups are also held to allow the participation of vulnerable groups, such as children, women, indigenous people. During the field visits, local NGOs, international organizations, Business Partners and suppliers are engaged through meetings and interviews.

The results of the HRIAs are finalized in Reports with recommendations released by the third-party consultants supporting Eni in the activity, followed by a dedicated action plan issued by Eni to allow an effective and monitored implementation of each action. If needed, recommendations and actions could be applicable to Business Partners, such as JV partners and suppliers, with the goal of accompanying them in a virtuous path of improvement and mitigating the potential human rights risks highlighted during the HRIAs.

In addition to the specific studies on human rights, Eni carries out 'Environmental Social and Health Impact Assessments' (ESHIA) and 'Health Impact Assessments' (HIAs), on top of the mandatory requirements for environmental authorization in the countries of presence, which guarantee compliance with recognized international standards<sup>5</sup>, and ensure the involvement of stakeholders in order to protect their interests, identify critical issues, assess potential impacts and put in place any mitigation measures.

<sup>5</sup> Such as UNGPs, OECD Guidelines, IFC Performance Standard and the methodologies defined by IPIECA.





# Taking action

## ACTING ACCORDING TO THE STUDIES' FINDINGS

The latest HRIAs were conducted in Congo and Kenya on the agrifeedstock activities for the production of biofuels, which have been finalised in 2023 and allowed the identification of recommendations aimed at mitigating potential negative impacts. In 2022, as part of the HRIAs, more than 1,000 people from local communities were engaged in surveys and meetings, as well as NGOs, Trade Unions representatives and other Institutional stakeholders. As a result, to address specific issues related to the agri-feedstock activities, also in other geographies, Eni developed a specific human rights framework dedicated to the development of such activities.

### Focus on

## A framework for respecting human rights in agricultural activities

As part of agri-feedstock initiatives, with the aim of appropriately managing the risk elements of the activation of agricultural supply chains or the collection and processing of agro-industrial and forestry waste/residues, a set of measures for the prevention of human rights impacts is being developed. The framework is characterized by a number of cross-cutting measures, such as conducting specific impact assessments for the entire supply chain activated, training and awareness-raising for Eni's counterparts and those operating along the supply chain, and strengthening screening and selection criteria for business counterparts. These measures are accompanied by partnerships and agreements with international institutions, e.g. with the ILO, or by the International Finance Corporation (IFC) investments in Kenya, as well as joint programmes, such as the Programme with IRENA (International Renewable Energy Agency) to facilitate dialogue and experience-sharing on accelerating the energy transition and the development of renewable energy in fossil-fuel exporting Countries.

For more information on the Countries of Eni's agri-feedstock activities see also [Eni for 2024 - A Just Transition](#)

During 2024, the Action Plans of the human rights studies conducted previously were implemented: in Kenya and Congo, with reference to agri-feedstock activities; in Mozambique with regard to Area 4; in Mexico, where a new set of actions was adopted on the basis of the follow-up carried out at the end of the previous three-year Action Plan (2020-2022).

See also the case study [Follow-up of the Human Rights Action Plan in Mexico](#)

The reports of the main HRIA studies and the related Action Plans adopted, including periodic reports on the progress of the Plans, are publicly available on the Eni website.

See also [Eni's website for the HRIA reports and Human Rights Action Plans](#)

In 2024, Eni also concluded 5 ESHIAs in Oman, Mozambique, the United Arab Emirates, Cyprus and Vietnam and 6 specific health studies, including a HIA for the Livorno Biorefinery. For each ESHIA, an 'Environmental and Social Management Plan' is drawn up, which integrates elements related to respect for human rights, describing the actions to mitigate these impacts during the life cycle of the project and sharing it with the authorities to monitor its progress. As regards the assessment of health impacts, it is either integrated into the ESHIAs or is carried out separately through HIA/VIS. In the event that potential health impacts deriving from operational activities are identified, this finding is disclosed to the identified stakeholders, in accordance with the applicable local legislation. A 'Mitigation and Monitoring Plan' is therefore drawn up, to ensure that the significant impacts identified are adequately managed and the progress of activities is periodically monitored. At the end of the construction of the projects, compliance with the project documents, including environmental and social issues, is verified and any deviations lead to the definition of corrective actions.

## CONSULTATION OF AFFECTED STAKEHOLDERS

Operating in different socio-economic contexts, it is essential to understand the expectations of stakeholders and share choices to build relationships based on mutual trust, to detect actual, potential or perceived impacts, and to identify the most effective ways of involvement. Understanding the context, including the cultural one, makes it possible to develop and promote adequate access channels and to adopt the most relevant methods of dialogue, information and management of any conflicts.

The involvement of local communities takes place by carrying out preventive, free and informed consultations, the responsibility of which is entrusted to the Managing Director at local level with the support of the Sustainability unit at central level and, in some contexts, specific figures are identified to develop a constant relationship (the Community Liaison Officers), also through periodic consultations in the different phases of business activities. Eni and its subsidiaries therefore carry out specific consultations with local communities, including indigenous people and vulnerable groups. For each new business development initiative, involvement takes place through public hearings open to local communities, including indigenous people, and in any case ensuring the active participation of authorities and local representatives so as to ensure both correct information on business developments and to allow the inclusion of any feedback throughout the project cycle. These consultations take place through information sessions, focus groups, sharing of information and reports throughout the project cycle, with periodic communications on the progress of business projects and awareness campaigns on health issues. Eni also identifies, where pertinent, the women's associations active in the territories in which it operates, in order to involve them in consultations or propose collaborations in projects.

Consultations are also an opportunity for sharing and informing communities of Eni's approach to human rights and sustainability, in general, as referenced in the Code of Ethics and in the Policy Respect for Human Rights in Eni. As for the latter, Eni's procedures recognise the importance of involving vulnerable groups and, adopting special tools and precautions such as: pre-consultation where possible; identification of appropriate representatives; identification of priority issues; attention to cultural appropriateness; sharing responsibilities with government for disclosure and consultation.

### Focus on

## Stakeholder engagement in Mozambique on offshore LNG projects

Coral South is the first project approved by Area 4 partners in the Rovuma Basin to develop natural gas resources discovered offshore in the Coral, Mamba and Agulha fields. The project develops the gas from the Coral offshore field by transforming it into liquefied natural gas (LNG) that can be transported by ship and distributed globally. A total of 86 cargoes have been delivered up to end of 2024, thereby contributing to the security of gas supplies on an international level.

The Coral South Project is the first of its kind in ultra deep waters on a global level, the first newly built floating liquefied natural gas (FLNG) of this scale in the African continent, and the first offshore oil and gas project in Mozambique.

Like every year, a Stakeholder Information Forum on the Coral South Project was held in Pemba in November 2024 with Cabo Delgado authorities, NGOs, and Tourism and Fisheries sector stakeholders. Updates on the ongoing and planned activities for the FLNG operation phase were shared. The Coral South project has also adopted a robust Grievance Mechanism (GM) and a comprehensive Stakeholder Engagement Plan (SEP). The Grievance Mechanism is a proactive and structured approach to promptly receive, recognize, investigate, respond, and resolve complaints and grievances from individuals, groups, or organisations. At the same time, the Stakeholder Engagement Plan is designed to keep all interested and affected parties well-informed and engaged. The plan ensures regular disclosure of information on the project activities and their impacts. Stakeholders can easily lodge grievances through the project's freephone number or email address, which can also be used to request additional information on the GM and SEP.

Eni plans to start another project in the Cabo Delgado Province, known as Coral North, which will build on the experience gained in the Coral South FLNG terminal development initiative. Public consultation with local authorities, communities, and other stakeholders part of the Environmental Impact Assessment (EIA) process were held in April at Pemba and in May at Maputo. Representatives of key government institutions and non-governmental organizations took part to the public consultation process, together with private sector, academic and research institutions, and civil society in general, which were directly invited. In addition to these direct invitations, advertisement of the public meetings was also made addressing a wider public. During the consultations participants were encouraged to share their opinion and ask questions regarding the project and its environmental and social assessment. Stakeholders had the chance to submit requests and suggestions during the month following the consultation by dedicated email and postal address.

*Focus on*

## Eni Guideline on Community Consultation

In order to conduct effective community consultation Eni has developed, with the support of the consultant **Community Insight Group**, a specific guideline to conduct community consultation, to ensure the process is both inclusive and responsive to community needs, fostering trust and collaboration from the early stages of project development.

The Eni Guideline on Community Consultation offers a structured approach for engaging communities by guiding through the practical steps of identification of key stakeholders, planning, implementing, monitoring and evaluating consultation. It provides for checklists that support each phase, samples of questions, and suggestions on how to overcome diverse attitudes at individual or collective level and how to ensure a process which is culturally sensitive and inclusive of vulnerable groups.

In 2024, to test the effectiveness and evaluate potential improvements of the instrument, the Guideline was applied as a pilot by Eni Mexico to inform a consultation process in the fishing sector.

The pilot conducted, which will be extended to other subsidiaries and projects, proved to be of support in organizing all the phases of the engagement with large groups of rightsholders and in better systematising the process of monitoring and follow up of outcomes and expectations.

To effectively manage relationships with stakeholders in the areas where Eni operates, the company has developed a specific tool: the 'Stakeholder Management System' (SMS). Operating both at central level and locally, it allows so far the mapping of more than 7,400 stakeholders and support the definition of engagement strategies as well as the management of requests and critical issues raised by each stakeholder (see also the chapter Access to remedy).

According to Eni's commitment to provide meaningful, timely and accessible responses to human rights concerns raised by affected stakeholders and local communities as well as for the sake of a transparent engagement with them, Eni communicates externally the results of some of the activities that have been carried out to prevent and mitigate human rights impacts. This specific communication is part of the wider disclosure on human rights issues and performances, which includes also the present report. This way to communicate was reinforced in the last few years with several initiatives aimed at making available reports, data and other relevant information concerning Eni's salient human rights issues, including those raised by affected stakeholders.

### LAND RIGHTS

Eni is committed to taking action to avoid the resettlement of Local Communities. In the event that this cannot be avoided, Eni has adopted internal procedures on involuntary resettlement with the objective of implementing a comprehensive, multi-phase land acquisition process that integrates the requirements of IFC Performance Standard 5 (PS5). This procedure is built on principles of avoidance, meaningful engagement, fair compensation, and livelihood restoration.

Land acquisition planning begins in the early stages of project design. Eni assesses alternatives to avoid or minimize displacement, including site selection and project layout adjustments. During the development of ESHIAs, potential impacts associated with land acquisition (physical and/or economic displacement) are identified and the appropriate planning instruments are identified.

Eni performs stakeholder engagement as a continuous, iterative process to ensure that affected persons are meaningfully consulted and their inputs reflected in project decision-making. Eni ensures that consultations are inclusive — particularly of women, indigenous peoples, and other vulnerable groups — and that information is communicated in a culturally appropriate and accessible manner.

Eni applies a rigorous, inclusive, and participatory process to identify rightsholders, in alignment with the principles and requirements of IFC PS5. Recognizing that land tenure rights can be formal or informal, individual or communal, and operating in countries where land tenure systems are often customary, Eni goes beyond legal title to capture the full spectrum of individuals and groups who may be impacted by land acquisition — ensuring that all potentially affected persons are acknowledged, and appropriately included in the resettlement and compensation framework.

*Focus on*

## Census, asset inventory and valuation

When a resettlement of local communities is not avoidable, a full household census is conducted within the project's footprint. All occupants, users, and dependents of affected land – whether owners, tenants, sharecroppers, seasonal users, or informal settlers – are registered. Simultaneously, an asset inventory captures structures, crops, trees, businesses, and communal resources. This process, and the determination of a cut-off date widely disseminated amongst local communities, allow Eni to determine eligibility and entitlements. Eni integrates socio-economic profiling into the census of affected communities through socio-economic surveys that allow it to understand livelihoods, income sources, dependency on land and natural resources, community dynamics and vulnerability factors and to use the baseline thus gathered to monitor effective restoration of livelihoods.

Independent experts are engaged to ensure that all assets – land, crops, structures, businesses, and communal resources – are valued at full replacement cost. Valuation figures feed into the calculation of compensation entitlements, which are shared with the Project Affected Persons (PAPs) in the framework of presenting compensation options – such as monetary and/or in-kind compensation – and livelihood restoration packages to be discussed with affected rights-holders for seeking an agreement.

Eni prepares a Livelihood Restoration Plan (LRP) (or a Resettlement Action Plan [RAP] as appropriate) outlining eligibility criteria, entitlements, livelihood restoration options, transitional support measures, institutional responsibilities, schedule, budget and monitoring mechanisms. Plans are subject to internal review and disclosed to affected stakeholders. Special attention is given to people who may be disproportionately impacted. Eni identifies vulnerable individuals during the census and provides targeted assistance to ensure equitable resettlement outcomes. Gender-sensitive programming is a core component of livelihood restoration.

A project-level Grievance Mechanism (GM) is operational from the onset of resettlement planning, allowing for timely, transparent resolution of disputes.

Monitoring is outcome-oriented and includes both internal tracking and review, and independent close out audits, when appropriate. Key indicators assess income levels, livelihoods restoration, satisfaction, and social cohesion, and closure is only pursued once livelihoods restoration objectives have been demonstrably achieved.

When resettlement is led by a government or a third party, Eni conducts an analysis to assess the process's alignment with IFC Performance Standard 5. Eni strives to ensure that legitimate tenure rightholders – including those without formal title and which might have been overlooked – are identified, consulted, and treated equitably, and advocates for their inclusion in compensation and support schemes. Where discrepancies exist, Eni strives to agree supplementary assistance to meet PS5 requirements with authorities.

When restrictions on access to natural resources occur, such as when economic displacement associated with the creation of exclusion zones during offshore construction works is established, the same principles are applied.

When indigenous people and/or when cultural heritage are potentially affected by Eni's activities, compliance with international standards, such as but not limited to IFC PS7 and PS8, is embedded throughout the involuntary resettlement process.

Through this structured, participatory, and impact-driven approach, Eni not only complies with IFC PS5 but ensures that land acquisition serves as a platform for inclusive development.

See also the case study [■ The Land Management Action Plan of Balaine - Ivory Coast](#)

## INDIGENOUS PEOPLE

Eni's policy commitment to promoting free, prior, informed consultation of communities becomes crucial when dealing with indigenous communities. As stated in the Policy Respect for Human Rights in Eni, Eni respects the specific rights of indigenous peoples, with particular reference to their cultures, lifestyles, institutions, bonds with their homeland and development models in line with international standards, the ILO Indigenous and Tribal Peoples Convention (No. 169) and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

Considering the industrial contexts in which it operates, Eni has direct contacts with indigenous populations or tribal groups and their representatives in Countries, such as Australia and Kenya. It has therefore adopted specific policies or procedures to protect their rights, culture and traditions, and to promote free, prior and informed consultation. In this context, Eni is working to integrate analysis related to cultural heritage (both tangible and intangible) throughout the entire business project development process, starting from the evaluation phase.

## SECURITY ACTIVITIES

Security activities can affect a wide range of human rights, including economic, social and cultural rights. They can have a significant impact, both negative and positive, on freedom of expression and the ability to participate in political processes.

Eni manages its security operations in compliance with the international principles also provided for by the Voluntary Principles on Security and Human Rights promoted by the Voluntary Principles Initiative (VPI), and expects its Business Partners to manage these activities, in collaboration with and/or in the interest of Eni, in full respect of the human rights and fundamental freedoms of individuals. Eni has been a 'full member' of the VPI initiative since 2022 and, in 2024, it has conducted a series of actions aimed at confirming its commitment and increasing the level of sensitivity and awareness in the management of potential impacts on the communities in which it operates, such as, for example, the application of the Conflict Analysis Tool (a tool developed by VPI to analyse the causes of conflicts in a given area/country) in Mozambique, through conducting interviews at local level and developing an action plan for mitigation actions.

### Focus on

## Involvement of Eni in National Working Group on Voluntary Principles on Security and Human Rights

In 2024, Eni joined several security and human rights related meetings in Mozambique, together with other energy companies and representatives of Governments, Commissions, Embassies, Ministers and from International Organizations and Civil Society were present. All these meetings had the objective of discussing business, security and human rights challenges in the country (mostly, in Cabo Delgado) and also of raising awareness about the Voluntary Principles and of promoting exchange on how Mozambique's membership of the VPI could advance security and human rights in the country.

In relation to private Security forces, Eni designed a consistent set of rules, processes and tools to ensure that:

- Security force providers are selected by considering human rights criteria, among others.
- Contractual terms with security forces include provisions on respect for human rights.
- Security operators and supervisors receive proper instructions and training on respect for human rights in practice.
- Security events and issues which are the highest human rights risks, including management of strikes and demonstrations and transfer of goods and services, are managed in compliance with international standards, including the Voluntary Principles on Security and Human Rights.

Eni is committed to actively cooperating with State Authorities and Government Entities in the implementation of Human Rights programs and to contribute, by respecting human rights in its activities and relations, to fostering respect for human rights, including by enhancing collective awareness on the importance of these principles, and to express its concern about any human rights issues that may arise in countries where it operates.

Since 2009, Eni has been promoting a training programme for public and private security personnel in the countries in which it operates to disseminate corporate best practices in line with international principles. In 2024, the 'Security & Human Rights' Workshop was held in Mozambique.

See Focus on [Security and Human Rights Workshop in Mozambique](#)



In addition, during 2024, a project was implemented, by the subsidiary's Security Managers, for the implementation of training workshops on human rights for local security forces, in order to increase the number of security forces trained, in addition to the traditional annual training course. The kick-off of the project was carried out in the 10 countries with the highest level of risk of human rights violations, defined by Eni's Risk Based Model 2023: Republic of Congo, Tunisia, Mexico, Ivory Coast, Kenya, Iraq, Nigeria, Libya, Algeria, Egypt; 716 people were involved, including Public and Private Security Force.

For a detailed description of Eni approach on the issue of Security and Human Rights see also

[🔗 Annual Report on Voluntary Principles On Security And Human Rights 2024](#)

## ACCESS TO WATER AND SANITARY SERVICES

Access to safe drinking water and basic sanitation has been recognised as a universal specific human right, a prerequisite for all the other human rights, as well as a central element for development.

Eni's commitment to the management of water resources is expressed within the Code of Ethics and then further detailed in 'Eni's Positioning on Water'. In line with its commitments, Eni pursues the protection of water resources in the Countries where it is present and in several phases of its activities, seeking solutions even beyond the corporate and operational boundary. Eni periodically assesses the withdrawals of its sites also to identify actions to safeguard water resources, with particular regard to reducing high quality fresh water withdrawals of sites based in water stress areas. Actions are defined in consideration of the water risk mitigation criteria: avoid, replace, decrease, recycle, restore. To this end, projects are promoted to increase the efficiency of water use, the use of remediated water or produced water to replace high quality fresh water, and civil and industrial wastewater recycling systems; the use of desalinated water is another important opportunity. Partnerships and the active engagement of stakeholders are promoted, for water management in harmony with the needs of the territory, to foster social development and safeguard ecosystems. These tools aim to identify withdrawals and consumption in the different sectors of activity to assess and minimise potential impacts on ecosystems and communities. The treatment, disposal or re-injection of water is subject to sector-specific best practices. In addition, procedures are defined to inform and involve stakeholders by promoting prior, free and informed consultation in order to consider their requests regarding Eni's activities, new projects and development initiatives.

*Focus on*

### Water positivity by 2050

In 2024 Eni declared its ambition to achieve water positivity by 2050 at its operating sites, through an approach that also takes into account actions at the river basin level, inspired by the Net Positive Water Impact principles proposed by the CEO Water Mandate. As an intermediate milestone along its path towards the 2050 ambition, Eni is committed to achieving water positivity in at least 30% of its sites with withdrawals greater than 0.5 Mm<sup>3</sup>/year of fresh water in water-stressed areas by 2035 (as of 2023). The commitment to water positivity envisages the identification of actions to safeguard water directed at the most critical aspects for the territory, in terms of availability, quality and accessibility of fresh water. Eni's actions will therefore be related to the identified needs and in consideration of the importance of the operating sites, giving priority to operating sites located in high water stress basins.

For a detailed disclosure about Eni's approach to the topic see also [🔗 Eni for 2024 - A Just Transition](#)

Moreover, as a results of the local development projects implemented in 2024, 35 sanitation facilities and 27 drinking water access points were built or renovated and awareness-raising activities on hygiene practices were delivered to more than 67,000 people.

For a detailed disclosure about Eni's projects to improve access to water and sanitation see also

[🔗 Eni for 2024 - A Just Transition](#)

## COMMUNITY HEALTH

To protect and promote the health of communities in the Countries where Eni operates, the company implements health development and health promotion programmes that can be integrated into business activities or initiatives aimed at supporting local governments in achieving the Country's health priorities. In the areas where Eni is present, it adopts tools and methodologies to identify potential impacts – negative and positive, direct and indirect – from the earliest project phases, with a view to reducing and/or mitigating them using health development plans and projects. To this end, as already mentioned, Eni draws up 'Health Impact Assessments' (HIAs), which can be stand-alone documents or integrated into 'Environmental Social and Health Impact Assessments' (ESHIA), according to recognized international standards, and ensure the engagement of stakeholders to protect their interests, identify critical issues, assess potential impacts and put in place any mitigation measures, which are appropriately monitored.

Community health initiatives consist of the implementation of specific projects for the improvement of health conditions and the promotion of the well-being of local communities in the Countries of presence and represent an important instrument for contributing to local development. In fact, the projects are implemented in line with local health policies and international best practices, and aim to protect the right to health, strengthening the health systems of host Countries to improve health conditions and contributing to social and health development.

For a detailed description of Eni's approach to community health see also [Eni for 2024 - A Just Transition](#)

### Case Study

## Follow-up of the Human Rights Action Plan in Mexico

In 2022, Eni has conducted a follow-up analysis of the 2019-2021 Human Rights Action Plan (HRAP) developed by Eni Mexico for Area 1 Development, following the 2019 Human Rights Impact Assessment (HRIA) conducted by the Danish Institute for Human Rights (DIHR). The assessment has focused on the five component areas identified by the HRIA and associated actions defined by the Human Right Action Plan: Accountability and transparency of the HRIA; Local communities; Fishers; Workplace, with a focus on contractor and subcontractor management, and local employment; Security. The methodology has included a desktop review of Eni documentation related to the assessment and management of human rights impacts (including impact assessments and plans, stakeholder engagement and communication documents, strategies, and plans - full list in the Annex) and interviews with both Eni colleagues and external stakeholders (local government, community representatives, fishing cooperatives, and local civil society organisations).

Furthermore, for this follow up activity, interviews with community and government external stakeholders have been conducted on the field, among them local communities, fishing cooperatives and contractors' workers. Some of the interviews with local communities took place in Villahermosa, Sanchez Magallanes, and other communities near Area 1 and many of the interviewed stakeholders were the same who were consulted at the time of the original HRIA field work (2019). The interviews concerned, among others, the following issues: the form and frequency of engagement activities conducted with local communities and fishermen, their satisfaction on accessibility and effectiveness of the grievance mechanism, the Human Rights Action Plan adopted and impact management measures.

The inputs received have been processed and considered for programming the New Human Rights Action Plan 2024-2025. Among the feedback received, fishers reported that fishing boats have to travel out further from the coast with, as a result, an increasing in gasoline use and overall costs. The situation, which is caused by several factors (over exploitation of fishing resources), is being managed by Eni through different activities, such as incorporating fishers in its local development program, granting fisher's equipment, and developing projects on alternatives to improve the productivity of the fishing sector. In this regard, interviews have also reported the need of better explaining and describing these activities to communities, to make sure the benefit are not perceived as not distributed fairly. Among the activities foreseen in the new Human Rights Action Plan there is the development of a new dedicated engagement strategy for the fishermen to improve communication and to make sure that local development activities are seen as accessible and inclusive.

*Case Study*

## Safe fishing campaign in Congo

### Awareness campaign for artisanal fishermen in Pointe-Noire on the risks of fishing near Eni Congo's offshore installations

Offshore installations in the coastal waters of Pointe-Noire can cause interference with artisanal fishing, or potentially cause accidents, such as collisions with fishing boats and problems with the use of fishing nets. According to local law, LNG project installations benefit from a 500-metre exclusion zone defined by law, implying restrictions on the use of maritime areas for artisanal fishing. However, offshore platforms in the coastal waters of Pointe-Noire unintentionally form artificial reef systems, called FADs (Fish Aggregating Devices), which attract fishermen, particularly artisanal ones, to the surrounding areas.

Prior to any temporary or permanent restriction of a fishing zone, Eni Congo conducts awareness-raising campaigns with the fishermen's associations of Côte-Matèze, Djéno, Ngoyo and the Centre d'Appui à la Pêche Artisanale (CAPAP) de Pointe-Noire, through awareness-raising and information sessions and telephone contacts, to explain the nature and duration of the operations, the type of vessels involved, the indication of the exclusion zone by means of a geographical map, and the need to refrain from advancing into the intervention area so as not to endanger one's own life, the lives of others and the integrity of the equipment.

Nevertheless, a steady increase of fishermen in the operational areas was observed. To better understand the reasons why fishermen expose themselves to risky situations by accessing the prohibited areas, a specific consultation campaign was developed with the Directeur Départemental de la Pêche et de l'Aquaculture (DDPA) of Pointe Noire/Kouilou and the artisanal fishing communities.

The first consultations were conducted in 2023, also in view of the comments and requests gathered from the surveys (public consultations) carried out during a specific fishery social context analysis and the Environmental and Social Impact Assessment on the Congo LNG project, in which several fishermen's associations and unions had taken part.

Through dialogue with the authorities responsible for fisheries, including the DDPA of Pointe-Noire/Kouilou, and meetings with representatives of fishermen's associations and experts from the DDPA, it was possible to understand the elements to be strengthened with respect to the awareness-raising campaigns conducted in the past and to develop a targeted engagement strategy. Representatives of fishermen's associations and communities suggested not only strengthening awareness in the event of restrictions on fishing areas (seismic campaign, geophysical, etc.), but also launching educational sessions to make fishermen aware of the risks associated with fishing near facilities.

It was agreed to conduct 4 annual awareness campaigns (2 in the dry season and 2 in the rainy season), as well as the creation of a WhatsApp group dedicated to the rapid exchange of information between the Eni Congo team and the DDPA.

According to representatives of the fishermen's associations, fish migrate according to water movements and seasonal variations, causing a concentration of fish in the southern area where the LNG project facilities are located, with the greatest risk to be expected posed by the influx of fishermen. In this context, a specific awareness campaign was conducted in July 2024, particularly in the three areas identified with the collaboration of representatives of fishermen's associations: 1. Ngoyo-Djéno-Côte Matèze; 2. Songolo-Raffinerie axis; 3. Débarcadère axis.

In view of the large number of fishermen from the affected communities, around 8,000, it was decided to adopt an engagement strategy, in coordination with DDPA, to disseminate information and gather feedback through the 'patrons des pêcheurs', the captains of the crews in the main fishing areas of Pointe-Noire, and the 'relais communautaires des pêcheurs', the representatives of the fishing communities.

More than 160 fishermen (de patrons des pêcheurs) and about 50 representatives of fishing communities took part in the three days of engagement. They were given the task of raising awareness among other fishermen and disseminating the information material produced (leaflets with awareness-raising messages and practical information, and t-shirt and caps to wear during activities), before a further awareness-raising cycle will be launched. And they reached more than 3.200 other fishermen.

Eni Congo will continue to collaborate with the DDPA to foster involvement and awareness, promoting the registration of fishermen with the body.

In addition, an offshore surveillance programme is under implementation using boats to facilitate communication with fishermen during fishing activities near offshore implants and FLNG.

The main recommendation gathered from engagement is the construction of a community and public center to support artisanal fishing. On June 12, 2025, Eni Congo signed a Special Agreement with the Congolese Government for the implementation of social projects, including the Support for Artisanal Fishing project.

*Case Study***The Land Management Action Plan of Baleine - Ivory Coast**

Eni has been present in Côte d'Ivoire since the 1960s. In 2015, it resumed operations in the Country by acquiring several offshore exploration blocks which led to the discovery of Baleine, an oil and associated gas reservoir located in deep waters, which is the first Net Zero upstream development in Africa for Scope 1+2 emissions. Carbon neutrality is ensured by adopting the best available technologies to minimise GHG emissions and by leveraging on a combination of offsetting initiatives implemented in the Country (including the distribution of improved cookstoves and REDD+ projects). According to the result of the Eni human rights due diligence process held in relation to the Baleine project, specific measures have been applied to prevent and manage potential adverse impacts on key human rights issues, such as the respect of workers' rights by third-party workers, and the potential adverse impacts on community rights during the land management processes. On the first aspect, dedicated clauses addressing workers' rights have been included in the contracts with major suppliers, while on the second one, specific considerations for vulnerable groups have been included in the Land Management Action Plan.

The project required indeed the development of a Land Management Action Plan for the construction of a 90 km gas pipeline laid on the seabed for 80 km and on land for 10 km connecting the offshore production facility to the tie-in plant in Abidjan, responsible for supplying the electric market in Côte d'Ivoire and the region. The pipeline routing was installed entirely on public domain and a first analysis of the potential impacts of the construction works allowed to modify and optimize the routing to minimize the impact on population. As a result, no private properties were crossed, and no residential buildings nor residential informal structures were affected, limiting the impact to economic displacement associated to temporary interferences and interruptions caused by the pipeline construction on local commercial/income-generating activities. The land management process was managed with the support of the Bureau National d'Etudes Techniques et de Développement and a dedicate Land and Fisheries Management Action Plan (LMAP) was formulated in accordance with Eni policies and with IFC Performance Standard number 5 on Land Acquisition and Involuntary Resettlement. The project affected people (PAP) were identified through a census of impacted population conducted according to international best practices in the area affected by the works and with the support of local authorities and stakeholders (mairie, chef du quartier, fishermen cooperatives) who were consulted in advance.

The census, and the respective cut-off date, was first announced and disclosed publicly in the area to be affected by the works through a diverse set of communication channels including radio announcements and community gatherings chaired by local representatives. The census was then conducted along the entire routing of the future pipeline considering not only the perimeter of the construction sites but also the exclusion zones established for safety reasons. The potentially project-affected persons (PAP) were identified as a result of this process, including both formal business owners and informal occupants and sellers. For the offshore impacts, artisanal fishing cooperatives were consulted to identify and contact the active members, including both fishermen and informal workers in the fish chain. During the works, regular engagement with communities was guaranteed through the appointment of a team of dedicated Community Liaison Officers present in field and the development of a LMAP-specific grievance mechanism. As mentioned, the impact analysis considered both onshore and offshore impacts and both formal and informal activities affected; this was the first time in Côte d'Ivoire that fishermen were involved in a compensation process.

Furthermore, the entire artisanal fisheries value chain was considered, including not only the fishermen but also the maryeuses, the women who clean and smoke the fish on the shore before it gets delivered to the market. Specific measures were adopted to accompany and assist vulnerable PAPs, such as financial management trainings before and after the receipt of the economic compensation and support with re-establishing their livelihoods. In order to calculate the compensation due to commercial activities, two methodologies have been adopted: for formal activities, the official certified revenues were used to calculate the amount, while for informal activities, the calculation was based on the declared monthly revenues and other relevant socio-economic data (e.g. for fishermen the revenues declared were crossed-checked with the quantity of fish captured per month and compared it with local fish market values). The data were then clustered and normalized across commercial activities categories and same-size businesses.

The average for each business category was taken as benchmark for the calculation of the amount due to the PAPs belonging to that category. Categories were established based on the goods/services provided and the size of the business. Both criteria and process of compensation were shared, communicated, and formally accepted by the PAPs prior to the receipt of the payment. The PAPs were engaged throughout the entire process, from the announcement of the census to the in-person collection of socio-economic data, from the explanation of the project works, the construction site's boundaries and the overall compensation process to dedicated one-on-one sessions to ensure each individual's comprehension of the compensation scheme and its calculation, from the acceptance in advance of the compensation amount and verification of identity, to the receipt of the actual payment. For those PAPs whose fixed assets would be impacted by the works, an alternative available temporary location was identified to ensure the preservation of the physical assets, and assistance was provided for the move before the commencement of the works.



# Key Performance Indicators

## HUMAN RIGHTS SECURITY

	Units of measurement	2023	2024
Security personnel trained on human rights	(number)	170	869
Security personnel (professional area) trained on human rights	(%)	90	92
Security contracts containing on human rights <sup>(a)</sup>		100	97

(a) The percentage change 2024 vs. 2023 refers to 3 contracts being updated to ensure the inclusion of specific clauses.

## LOCAL DEVELOPMENT INVESTMENTS AND GRIEVANCES

	Units of measurement	2023	2024
Local development investments by sector of intervention	(M€)	95.0	88.8
Access to energy		3.5	0.7
Economic diversification		35.2	46.0
Education and vocational training		26.1	25.4
Access to water and sanitation		2.2	0.9
Life of land		6.9	3.9
Health		10.7	7.1
Compensation and Resettlement <sup>(a)</sup>		10.4	4.8

(a) The figure includes expenses for resettlements activities, which in 2024 amounted to €4.8 mln mainly related to non-operated assets (€4.6 mln in Mozambique for Rovuma LNG project, €0.2 mln in Kazakhstan for the Berekova project) and €0.01 mln in Ghana.





# Access to remedy

Eni is committed to adopting, also in collaboration with third-parties, remedial measures against the adverse human rights impacts it may cause, or contributes in causing, as well as to make every effort to ensure a remedy if the impact is directly related to its activities, products or services. To this end, Eni commits to endeavouring using its leverage on third-parties to ensure that adverse human rights impacts directly linked to their activities are remedied. Eni prohibits, and is committed to preventing, retaliation against workers and other stakeholders who raise concerns related to human rights and does not tolerate or contribute to threats, intimidation, retaliation or attacks (both physical or through lawsuit) against them or human rights defenders. Eni also does not prevent in any way access to judicial or non-judicial remedies and cooperates in good faith with such mechanisms.

Two specific tools are available to stakeholders in the event of alleged human rights violations: (i) the grievance mechanism, i.e. the process of sending, managing and resolving complaints or grievances collected locally, in which grievances referring to human rights classified as ‘relevant’ undergo a specific process of analysis and response; (ii) the whistleblowing management process, which allows anyone, whether employees or third-parties, to report, confidentially or anonymously, issues concerning the Internal Control System or other matters in violation of the Code of Ethics.

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# Grievance mechanisms

Eni has defined and applies guiding principles for managing 'Grievance Mechanisms', responsibility for which, at the operational level, lies with all the subsidiaries and the districts who analyse and agree on the solution with the claimants (individuals or communities). Any request or complaint received is managed and monitored until closure, providing a response even if they are not related to Eni's activities. To guarantee complainants having adequate access to the mechanisms, multiple access points are established, and parties have been given adequate notice of the mechanism's establishment. Grievances can be transmitted, for instance, through online channels, including dedicated email addresses and institutional websites of local companies, or physically at the administrative/operational headquarters, through collection boxes located in areas where Eni's projects are located, as well as by engaging the Community Liaison Officers or through trusted third-parties (NGOs, local associations, etc.).

## Focus on

### The role of the Community Liaison Officer

The Community Liaison Officers are Eni's representatives in charge of building positive and trust-based relations with communities and stakeholders through direct and continuous listening. Their role ensures a continuous engagement and communication with local communities' members and representatives: their presence on the territory is crucial to encourage positive communication and provide accessible information to potential affected stakeholders on how Eni manages specific issues and handles the concerns they raised.

All grievances received are analysed and managed by subsidiaries and are tracked in the 'Stakeholder Management System' (SMS) platform, which is the management tool for mapping the relationship with stakeholders. SMS supports the grievance's classification by relevance and by the subject matter of the complaint, with the aim of possibly adapting the engagement strategy accordingly and also to assess any repetition of complaints and/or their evolution towards possible litigation. SMS also helps in the tracking of each phase of the grievance management, since its receipt until the resolution, allowing the monitoring of the progress of each single complaint and of the entire set of open grievances, with particular reference to evaluating more efficiently the reasons for any slowdowns and correctly evaluating the percentage and the timing of resolution.

During the entire examination phase, Company keeps the complainants updated on the developments of the case. The Company indicates for each grievance to the complainants: the activities planned for the management of grievance where possible and appropriate, and the timeframe that can reasonably be expected for the conclusion of the grievance management process.

Once the merits of the grievance have been assessed and the analysis process has been completed Eni communicates and discusses it with the complainant, also collecting complainant, requesting observations or alternative solutions, always ensuring that they are tracked and archived. In the event of dissatisfaction, Eni examines the reasons and, where necessary, activates the response process, also with the involvement of third-parties.

The implementation of the grievance mechanisms aims at understanding the causes and grounds for the grievance; afterwards, depending on the issue, either financial and non-financial actions could be taken to eliminate such causes and/or minimise its impact. For example, in the case of any proven damage to private properties or activities, or any not foreseen interference with activities of fishermen or farmers, relevant compensation will be assessed in collaboration with local authorities and paid in accordance to publicly defined tariffs. In the case of grievances related, for instance, to any environmental impact or any agreement with local communities, the resolution could leverage on specific engagement to identify proper measures.

*Focus on*

## The involvement of third-parties in managing grievances

This involvement may consist of, but not be limited to: referring the matter to a review committee composed of representatives from Eni and from the local community in equal measure (in these cases, the local community has to be well represented in terms of number of members, without however hindering the operation and efficiency of the review committee); suggesting recourse to an independent third-party who assesses the complaint and proposes an impartial resolution that the parties will decide whether to accept or reject. The third-party members (including the single independent third-party) above are identified in agreement between Eni and the third-party complainant and must meet the requirements of good reputation and professionalism, also from an ethical and moral point of view, ensuring impartiality in the process of assessment and proposed resolution. If it is decided to propose recourse to an independent third-party, the subsidiary also performs the relevant anti-corruption obligations, if any, on the potential third-party.

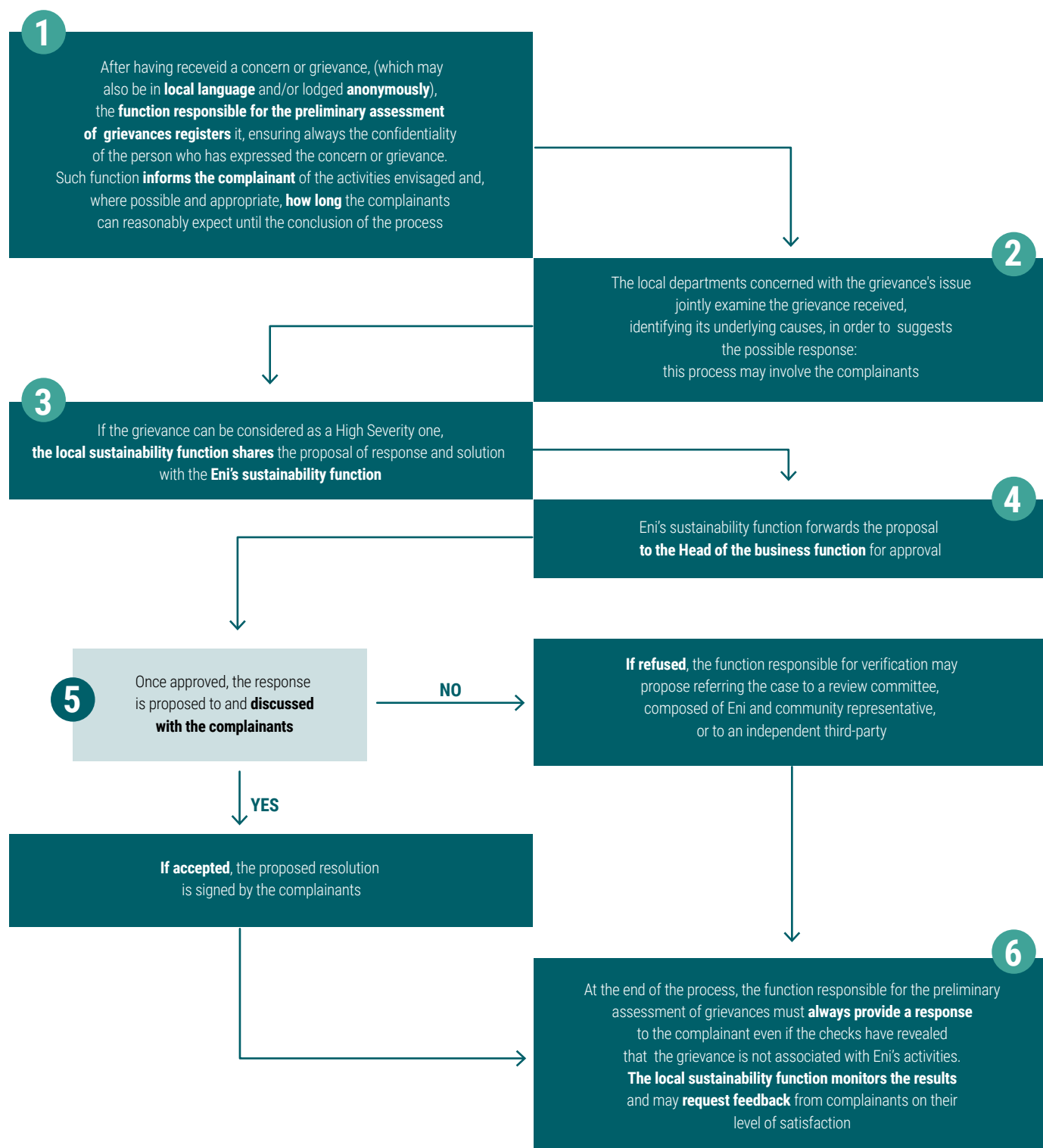
To ensure the effectiveness and robustness of this mechanism, the arrangements for access by complainants shall be assessed, in each context, specifically focusing on the linguistic accessibility and the need for assistance in filing the grievance, as well as the awareness regarding the existence of the mechanism and on its functioning.

In the relevant Countries, Eni carries out regular monitoring of the effectiveness of the grievance mechanism every three months, according to specific indicators: i.e. whether and how to make the results of the indicators accessible to communities; the best forms of communication, including on access to the mechanism; the level of awareness and assistance provided in compiling complaints through periodic discussions with communities.

It should be highlighted that, to define the grievance mechanism's structure and implementation, a subsidiary may set up an ad hoc consultation with local communities, especially with indigenous peoples, in cases where numerous concerns and/or grievances are anticipated, or where the projects or activities involve economic or physical relocation of communities. As for the performance evaluation of grievance mechanisms, the procedure entails that the local sustainability function assesses whether and how to make the evaluation results accessible to the local communities.

During 2024, 61 grievances were received. A total of 43 grievances were resolved during the year, (of which 34 were received during 2024), which mainly concerned: community relations management (the most recurrent category), management of environmental aspects, land management and supplier management.





*Focus on*

## How the lessons learned drove the update in the grievance mechanism procedure

Eni reviewed its internal regulatory instrument that defines principles, roles and best practices for the management of grievances, in the general framework of continuous improvement of company's processes. Such review led to a new classification of grievances on three different degrees of severity, to support all subsidiaries in Italy and abroad in a coherent assessment of the relevance and impact of grievances. The topics that gained the most attention, in coherence with Eni mission, are related to: threats, aggression, harassment; land acquisition and community relocation/resettlement; negative impacts on the socio-economic conditions of women and girls in local communities; environmental impacts with effects on the health of communities or that undermine the livelihood of local economic activities; impacts on the historical/cultural heritage of local communities. Depending on the grievance severity level, the internal procedure specifically describes different processes of sharing and approval of grievance resolution proposals. This in order to ensure that the management of low severity grievances is more timely, and to ensure the involvement of top management in the high severity cases.

For instance, all subsidiaries in Italy and abroad can formulate the proposal for resolution considering also the recommendations/opinions received from corporate functions responsible for the issue of the grievance; afterwards, the proposal for the resolution is approved by the head of the subsidiary. Eni's internal regulatory instrument identifies the relevant company's functions responsible for the follow-up of the actions agreed in the resolution of the grievances, to ensure they are correctly implemented. Grievance closure occurs after an agreed resolution has been implemented and implementation has been verified. The revised internal procedure also introduced a specific monitoring by gender of claimants, in relation to grievances expressed on an individual basis, to support the understanding of needs and concerns of women in local contexts. The first results of this monitoring in 2022 highlighted the importance of on-going actions on gender-mainstreaming in consultations and local development initiatives.

*Focus on*

## Safeguards for the claimants

The confidentiality of the content of the grievance is safeguarded in a way that protects the anonymity of the claimant, without any prejudice. Eni prohibits and is committed to preventing any retaliation against workers and other stakeholders who have reported grievances, and as indicated in the Human Rights Policy, nor does it tolerate or facilitate threats, intimidation, retaliation and attacks (physical or legal) against human rights defenders and other stakeholders in relation to its activities.

Claimants are not asked by Eni to permanently waive for their rights: filing a complaint with grievance does not prevent or impede any complainants to access other legal or administrative remedies.



# Whistleblowing reporting management system

Since 2006, Eni has had an internal regulation for management of whistleblowing, updated in March 2024, which allows employees or third-parties to report information on alleged violations acquired within the work context. Whistleblowing Reports are handled by a dedicated team that operates in accordance with the principles of objectivity, competence and professional diligence, also ensuring feedback to the whistleblower.

In order to facilitate the receipt of whistleblowing reports, both in written and oral form, using IT tools suitable for guaranteeing the confidentiality of the whistleblower's identity, as well as of the content of the whistleblowing report (including the identity of the reported person), a specific platform is in place, publicised on corporate [websites](#)

## MANAGEMENT OF WHISTLEBLOWING



See also: the procedure [‘Whistleblowing reports management received by Eni SpA and by its Subsidiaries’](#)

The platform guarantees, to ensure proximity to the whistleblower, the management of autonomous channels for Eni SpA and for EU subsidiaries with more than 249 employees or in other cases where this is necessary for the purposes of fulfilling the obligations of the local regulations implementing Directive (EU) 2019/1937. The individual subsidiaries have also established alternative tools for collecting whistleblowing reports, such as dedicated physical mailboxes or voicemail boxes, managed through dedicated functions of the platform. These modalities are adopted, when necessary, for instance in case of difficulties in accessing the Internet. The identity of the whistleblower and any other information from which that identity may be inferred, whether directly or indirectly, cannot be disclosed without the whistleblower's express consent, except in the cases provided for by law. The whistleblower is protected against any act of retaliation or discrimination, whether direct or indirect, for reasons connected with the report. Any violation of the prohibition on retaliatory and discriminatory conduct may result in disciplinary proceedings being instituted against the individual who engaged in such conduct and the adoption of appropriate disciplinary/supportive measures for any parties involved. This is without prejudice to the right of the whistleblower to inform the competent local authorities, bodies or institutions of the retaliation they believe they have suffered.

During 2024 the investigation of 63 files<sup>6</sup> was completed, of which 32 referred to human rights – mainly relating to potential impacts on workers' rights and occupational health and safety. In particular, 64 assertions were verified, for 10 of which the reported facts were confirmed, at least in part, and corrective actions were taken to mitigate and/or minimise the impacts, including: (i) actions on the Internal Control and Risk Management System, relating to the implementation and strengthening of existing controls; (ii) awareness-raising actions on the issues of the Code of Ethics and the Policy on Zero Tolerance against violence and harassment in the workplace; (iii) actions against employees, including disciplinary measures, according to the collective agreement and other applicable national laws.

<sup>6</sup> Report file: it is a summary document of the investigations conducted on the report(s) – which may contain one or more detailed and verifiable assertions – in which the summary of the investigation carried out on the facts subject to the whistleblowing report, the outcome of the investigations carried out and any action plan identified are reported.

WHISTLEBLOWING FILES ON HUMAN RIGHTS VIOLATIONS

	Units of measurement	2023	2024
Whistleblowing files (assertions) on human rights violations - close during the year	(number)	46 (62)	36 (64)
of which: employees <sup>(a)</sup>		n.a.	11
Founded assertions		8	10
Unsubstantiated allegations/not verifiable <sup>(b)</sup> /not applicable <sup>(c)</sup> assertions		54	54
Inherent incidents of discrimination		6 <sup>(d)</sup>	3 <sup>(d)</sup>
Whistleblowing files (assertions) on human rights violations with potential socio-economic impacts on local communities		0	0
Whistleblowing files (assertions) on human rights violations with potential impacts on health, safety and/or well-being of local communities		1 (2) <sup>(e)</sup>	1 (2) <sup>(e)</sup>

(a) Net of the 11 Whistleblowing Files referring to anonymous whistleblowing reports. The indicator is available from 2024.  
(b) Assertions that do not contain circumstantial, precise and/or sufficiently detailed elements and/or, for which, on the basis of the investigative tools available, it is not possible to confirm or exclude the validity of the facts reported.  
(c) Assertions in which the facts reported coincide with the subject of pre-litigation, litigation and ongoing investigations by public authorities. The assessment shall be carried out after the opinion of the Legal Affairs function or other relevant functions.  
(d) The alleged episodes of discrimination have not shown any valid grounds.  
(e) Both assertions relating to this whistleblowing file have not shown any valid grounds.

Focus on

Expectation towards business partners

As stated in the Supplier Code of Conduct, Eni expects that also its business partners to provide their employees and the communities with whom they interact on behalf of Eni with their own remedial mechanisms that can be used also anonymously. Moreover, Eni makes its own channels available to its business partners – including their employees – ensuring prompt and effective handling of reports concerning potential violations of rights, laws, or regulations. These channels support both confidential and anonymous reporting, and Eni explicitly prohibits any form of retaliation against the claimants.

Litigation and non-judicial mechanisms

Eni cooperates with other non-judicial mechanisms, such as the one established and governed by the OECD Guidelines and implemented through the OECD National Contact Points present in various Countries.  
In recent years, Eni actively participated in good faith in the instances submitted to the Italian and Brazilian NCPs.



## **Eni SpA**

### **Headquarters**

Piazzale Enrico Mattei, 1 - Rome - Italy

Capital Stock as of December 31, 2024: € 4,005,358,876.00 fully paid

Tax identification number 00484960588

### **Branches**

Via Emilia, 1 - San Donato Milanese (Milan) - Italy

Piazza Ezio Vanoni, 1 - San Donato Milanese (Milan) - Italy

### **Contacts**

eni.com

+39-0659821

800940924

segreteria.societaria.azionisti@eni.com

### **Investor Relations**

Piazza Ezio Vanoni, 1 - 20097 San Donato Milanese (MI)

Tel. +39-0252051651 - Fax +39-0252031929

e-mail: investor.relations@eni.com

### **Layout and supervision**

K-Change - Rome

