



# CREATING SUSTAINABLE VALUE TOGETHER

SUPPLIER

CODE  
OF

CONDUCT



TABLE OF CONTENTS

- ENI'S MISSION ..... 2**
- OUR COMMITMENT ..... 3**
- THE VALUES THAT GUIDE OUR CHOICES ..... 4**
- WE RECOGNIZE AND PROTECT THE QUALITY OF OUR PEOPLE ..... 5**
  - We promote the health and safety of our people ..... 5
  - We support the creation of an ethical work environment, recognizing the role of diversity and valuing the professionalism of our people ..... 6
- WE COMMIT TO COUNTERING CLIMATE CHANGE AND ITS EFFECT ..... 7**
  - We support a low-carbon energy transition safeguarding the environment and optimizing the use of energy resources ..... 7
- WE OPERATE WITH INTEGRITY ..... 9**
  - We operate in accordance with the laws ..... 9
  - We prevent and manage conflicts of interest ..... 9
  - We fight corruption ..... 10
  - We operate in the market with loyalty, fairness and in compliance with the regulations ..... 11
  - We protect privacy rights ..... 11
- WE RESPECT AND PROTECT THE COMPANY ASSETS ..... 12**
  - We use the corporate assets correctly ..... 12
  - We protect Corporate Information and Intellectual property ..... 12
  - We protect Eni's reputation ..... 13
- PUTTING OUR CODE TO ACTION ..... 14**
  - Violations and remedial measures - Reporting channels ..... 14
  - Monitoring violations of the Code ..... 14

## ENI'S MISSION



*We are an energy company.*

*We concretely support a just energy transition,*

*with the objective of preserving our planet*

*and promoting an efficient and sustainable access to energy for all.*

*Our work is based on passion and innovation,*

*on our unique strength and skills,*

*on the equal dignity of each person,*

*recognising diversity as a key value for human development,*

*on the responsibility, integrity and transparency of our actions.*

*We believe in the value of long term partnerships with the countries and communities where we operate bringing long-lasting prosperity for all.*



The United Nations 2030 Agenda for Sustainable Development, presented in September 2015, identifies 17 Sustainable Development Goals (SDGs) that represent common objectives of sustainable development in today's complex social challenges. These objectives constitute an important reference for the international community and for Eni in conducting its activities within the countries in which it operates.



## OUR COMMITMENT

Eni is committed to ensuring respect for internationally recognized human rights, in line with **the United Nations Guiding Principles on Business and Human Rights (UNGP) and with the OECD Guidelines for Multinational Enterprises and Voluntary Principles on Security & Human Rights.**

Eni is determined to contribute positively to the achievement of the **Sustainable Development Goals (SDGs)**, to support a **low-carbon and socially fair energy transition**, and to support the objectives contained in the Paris Agreement.

Eni intends to involve its Suppliers in this path and develop relationships with Suppliers of proven professionalism, capable of operating according to the highest quality standards and who share its own corporate values and principles.

In fact, the selection of reliable partners is an essential activity for the value creation for Eni's stakeholders in order to **guarantee innovation, continuous improvement** and to protect **Eni's integrity and reputation** on the market.

To this end Eni, inspired by the principles of its Code of Ethics, the MSG Anti-Corruption and in Eni's Statement on respect for Human Rights, has adopted this Code which describes the minimum requirements and expectations that all its Suppliers are required to meet, in order to continuously improve their activities and services, optimized by developing, whenever possible, innovative technology, in digital terms too.

Eni intends to develop and strengthen its relationship with those **Suppliers who share the principles expressed in the Eni Code of Ethics, as also contained in this Code, and promote their adoption** among their people and supply chain.

The requirements in this Code do not replace but they add up to the legal requirements and provisions and to those contained in the contractual commitments between the Suppliers and Eni.

## THE VALUES THAT GUIDE OUR CHOICES

Our values tell about us and what we believe in, guide our actions, define our commitment and guide both our behavior and that of our stakeholders.

OUR VALUES	APPROACH
Integrity	We carry out our daily activities with responsibility, equity, fairness and good faith, respecting internal and external regulations.
Respect and protection of Human Rights	We operate with respect for human dignity and Human Rights and we require the same commitment from all our partners. We ensure an inclusive work environment that values uniqueness and diversity as fundamental resources for the development of humanity.
Transparency	We are attentive to the needs and expectations of our stakeholders. We are committed to be engaged in continuous dialogue with our counterparts, providing them clear, complete and truthful information, being aware that sharing objectives and results is essential to maximize value and reduce business risks.
Promotion of development	We work to support an efficient and sustainable access to energy resources that protects the needs of future generations and respects Human Rights, the environment and society as a whole. We favor an inclusive development that can generate shared and lasting value in all territories in which we operate by working alongside the communities.
Operational excellence	We guarantee the efficiency and integration of our activities, minimizing risks and creating opportunities along the entire value cycle.
Teamwork and collaboration	We work with passion, believe in team spirit and value everyone's skills. We recognize collaboration as a foundational element to building solid and lasting relationships, through which we can express our potential and achieve corporate objectives.
Innovation	We believe that innovation is at the basis of personal and business growth. We are committed to acquiring cutting-edge technological skills in order to develop innovative ideas and improve our daily activities, contributing to the progress of civil society by increasing safety and reducing environmental impact.

We are committed, as Eni, to ensuring legality, transparency and fairness in all activities and creating long-term value for all our stakeholders. Therefore, we expect our Suppliers to equally adopt socially responsible behavior and develop adequate ethical programs and safeguards, consistent with our principles and behaviors. We reserve the right to take appropriate measures against those who do not meet the above expectations and do not act in accordance with these principles.

Under no circumstances acting in favor or in the interest of Eni may even partially justify behaving in conflict with such principles on the part of Suppliers.



# PEOPLE

## WE RECOGNIZE AND PROTECT THE QUALITY OF OUR PEOPLE

### WE PROMOTE THE HEALTH AND SAFETY OF OUR PEOPLE

In order to guarantee everyone's health and safety, Suppliers are required to identify and assess risks in advance in order to be able to manage and prevent them, providing **suitable tools for prevention and protection** from any culpable or malicious behavior, including from third parties, which could cause direct or indirect damage to the company's tangible or intangible resources, periodically updating the preventative measures and using the best available protection technologies and practices.

Suppliers shall guarantee top management's full commitment in handling the health and safety, as well as training, and in raising workers' awareness on the adoption of a conduct that safeguards health and safety.

**Suppliers are required to commit to avoid illegal or dangerous behavior** and report any situation that could represent danger.

Suppliers are also required to pursue the **continuous improvement**, and in particular, when the activities are carried out at Eni's sites, to guarantee the cooperation with Eni and other Suppliers,

for example by participating in specific indicators, in the proactive application of good practice, monitoring and control programs, in reporting, investigating and sharing the *lessons learned* from all accident events (accidents and near misses) and in the preparation and management of emergencies.

**WE SUPPORT THE CREATION OF AN ETHICAL WORK ENVIRONMENT, RECOGNIZING THE ROLE OF DIVERSITY AND VALUING THE PROFESSIONALISM OF OUR PEOPLE**

In accordance with the **International Labor Organization Declaration on Fundamental Principles and Rights at Work** and with the purpose of protecting environment and promoting environmental sustainability, in order to prevent and/or avoid that their activities may cause or contribute to cause Human Rights violations, Suppliers are required to:

- > **prohibit the forced labor, the undeclared labor, the compulsory labor and all the forms of modern slavery and human trafficking**; it is also explicitly forbidden to seize the identity documents, request deposits of money (or other values) and withhold part of the wage associated with the payment of hiring fees, the immigration and transfer as well as putting in place other practices that hinder the free termination of the employment relationship;
- > **prevent any form of work by children under the age of 15 and ensure, in compliance with local law, that teenagers under the age of 18 are not employed in hazardous jobs**;
- > **abide by working times and rest periods** in compliance with the applicable legislation and in line with international standards;
- > **prevent any kind of discrimination** (on the basis of race, religion, national descent, social origin, skin color, gender, political opinion, sexual orientation or any other condition that could give rise to discrimination), **or abuse**, establishing working relationships characterized by **fairness, guaranteeing** equal opportunities for all and ensuring a **non-discriminatory** or non- persecutory work environment free from any kind of harassment and oppression;
- > **ensure respect of workers' rights and trade unions freedoms** such as, in particular, freedom of association and collective bargaining, including the right of workers to freely choose their representatives and to represent other workers, while remaining neutral with regard to the employees' decision to join and remain in a trade union organization, and to provide adequate access to the workplace also to workers' representatives, abstaining from any discrimination towards the latter;
- > **establish clear and fair working conditions** defined in the employment contract written in the languages provided by the local legislation, including fair remuneration, sustainable working hours as well as parental leave and holidays, in a safe and healthy working environment, in accordance with the applicable agreements;
- > moreover, taking into account the operating context and the activities that are carried out, respect the cultural, economic and social rights of the local communities, minorities, indigenous peoples and other vulnerable groups.



## WE COMMIT TO COUNTERING CLIMATE CHANGE AND ITS EFFECT

WE SUPPORT A LOW-CARBON ENERGY TRANSITION SAFEGUARDING THE ENVIRONMENT AND OPTIMIZING THE USE OF ENERGY

With the purpose of protecting environment and promoting environmental sustainability, Suppliers are required to:

- > commit to **acting sustainably**, minimizing environmental impacts and optimizing the use of energy and natural resources;
- > conduct their activities through the responsible use of resources so as **not to compromise the needs of future generations**, but, rather, promote the respect for the society as a whole;
- > **commit to actively participating in the process of risk assessment and environmental protection**, in line with the principles of **precaution, prevention, protection and continuous improvement**;
- > contribute in the achievement of company targets regarding the **efficiency of plants and reduction of direct emissions**, the **promotion of a low-carbon impact energy mix** and a steady effort in **research and development**;

- > manage and monitor the environmental aspects relevant to their activities, drawing inspiration from broadly **internationally** recognized environmental management standards and models;
- > integrate the sustainable environmental principles into their supply chain management (optimization of energy use, of raw materials' use, of land management, of emissions to air, of consumption and of the impact on water resources and of reduction, reuse and recycling of waste), supporting Eni in the challenging process towards **"carbon neutrality"** and **the circular economy** and helping to build a more sustainable development in the interest of the planet.



## WE OPERATE WITH INTEGRITY

### WE OPERATE IN ACCORDANCE WITH THE LAWS

Suppliers must comply with all applicable international, EU, national, regional and local laws and regulations, including those regarding the execution of the specific contract. Additionally, they must refer, wherever possible given the contract characteristics, to the highest internationally recognized standards related in particular to the principles described in this Code.

### WE PREVENT AND MANAGE CONFLICTS OF INTEREST

Suppliers shall not seek to obtain an improper advantage or improperly influence the ability of Eni's employees to make valid, impartial and objective decisions on behalf of Eni.

Suppliers shall:

- > avoid practices related to the **commission or participation in fraud**;
- > not seek to obtain an **improper advantage** or improperly influence the ability of Eni's employees to make valid, impartial and objective decisions on behalf of Eni;

- > refrain from **any undue interference with the decision-making process** related to the vendor qualification, contract award or subcontracting authorization activities, including the request for confidential information or the request for information outside the dedicated communication channels;
- > prioritize the direct contact with Eni, **avoiding any type of intermediation** and reporting clearly prior to establishing any relationship with Eni's representatives the presence of either contingent or structural situations of this kind in their own modus operandi;
- > ensure utmost **transparency of the information needed to develop the procurement processes**, including information regarding the company's shareholding structure, the clarity and sustainability of their bids, also in terms of real operational capabilities, refraining from providing false or misleading information, or omitting relevant information likely to influence the decision-making processes related to the qualification, contract award or subcontracting authorization processes.

Suppliers shall timely report any **situation that is or may appear to conflict** with Eni's interests in any way (this includes also situations in which Suppliers are aware, or should have been aware, of the circumstance that an Eni employee has a direct or indirect financial, economic or personal interest in the Supplier's business, company or its shareholding structure).

#### WE FIGHT CORRUPTION

Eni combats all forms of corruption without exception and, in particular, Suppliers shall:

- > refrain from offering, promising, giving, paying or authorizing anyone to directly or indirectly give or pay for material, financial or any other advantages a Public Official or a private party (**Active Corruption**);
- > refrain from accepting or authorizing anyone to directly or indirectly accept requests or solicitations of a financial or any other advantage from a Public Official or from a private party (**Passive Corruption**);

when the intention is to:

- > induce a Public Official or a private party to improperly carry out a public function or any business-related activity, or compensate him for the carrying out of such function/activity;
- > influence any official act (or omission) by a Public Official or any decision that violates any public duty;
- > obtain or secure an unlawful advantage in doing business;
- > **or in any case, violate the applicable laws.**

Suppliers undertake not to make **Facilitation Payments** (meaning unofficial payments made to a Public Official in order to speed up, facilitate or secure the performance of a routine action).

Also, Suppliers accept that the remuneration to be paid will be exclusively commensurate with the activities under the contract, and that payments will be made exclusively to the contractual counterpart, in the Countries where the parties are incorporated or in the Country where the contract is performed.

## WE OPERATE IN THE MARKET WITH LOYALTY, FAIRNESS AND IN COMPLIANCE WITH THE REGULATIONS

Suppliers undertake to adopt and respect the principles of **free competition, loyalty and fairness and in no way encourage or tolerate Human Rights violations or other illegal activities, such as money laundering and any form of terrorism financing.**

Suppliers shall adopt the necessary measures to conduct their activities in compliance with the applicable export control regulations as well as the **Economic and Financial Sanctions.**

Suppliers shall compete on the basis of their merits and refrain from:

- > any **anti-competitive conduct**;
- > any **deceitful or illicit** market behaviour, including agreements or **collusive practices** with competitors to fix prices, manipulate tenders, share customers among themselves and/or limit the offer;
- > any inaccurate statements regarding their own products or those of others.

## WE PROTECT PRIVACY RIGHTS

Suppliers shall manage personal data and confidential information by complying with data protection and information privacy laws as well as best practices applicable in the jurisdictions where they operate. Supplier shall protect the privacy rights of their stakeholders, using collected personal data only for rightful, defined and appropriate purposes.

Suppliers are required to ensure the respect and protection of personal data they use, both their own data and those of the third parties, guaranteeing the adoption of dedicated procedures, in particular through the implementation of adequate security measures. Suppliers are also required to ensure to have adequately trained the persons in charge of data processing, as well as - according to the applicable law - to have correctly appointed the privacy representative in every area of company activity.



## WE RESPECT AND PROTECT THE COMPANY ASSET

### WE USE THE CORPORATE ASSETS CORRECTLY

Suppliers are responsible for the **proper and correct use of the assets made available by Eni** for the proper performance of the work. They are therefore required to guarantee assets integrity **by protecting them against theft, abuse, sabotage, loss or damage.**

### WE PROTECT CORPORATE INFORMATION AND INTELLECTUAL PROPERTY

While undertaking the responsibility that the information to be disclosed is truthful and accurate, Suppliers shall **ensure the confidentiality** required by the circumstances of all information acquired, in any form, as a consequence of their relationship with Eni and related to information that regards both Eni and third parties, in accordance with the applicable laws, regulations and the contractual provisions.

Suppliers shall guarantee the **security of the information** according to its importance and, where necessary, perform a risk assessment to identify the most appropriate security measures.

Suppliers shall **recognize the ownership and avoid the infringement of any and all intellectual property rights of Eni and/or third parties**, including but not limited to those concerning trademarks, trade names, signs, logos, domain names, distinctive signs, patents,

know-how, registered designs and models, copyrights, and **shall identify and report any violation, even potential.**

## WE PROTECT ENI'S REPUTATION

Eni's reputation represents the consideration and perception that stakeholders have of the company and its activities in relation to the behaviors of Eni resources and the results obtained. Suppliers are therefore committed to protecting Eni reputation.

With a view to safeguarding such values Eni Suppliers:

- > adopt excellent behaviours;
- > refrain from any improper or unauthorized use of the Eni brand;
- > are aware that any and all actions they take shall not cause even potential damage to Eni's reputation.

## PUTTING OUR CODE TO ACTION

### VIOLATIONS AND REMEDIAL MEASURES – REPORTING CHANNELS

Eni makes available to workers, to the communities with which it interacts and to its Suppliers (including their employees) tools for a prompt response to alerts of potential violation of their rights, of laws and regulations and of its own Code of Ethics (*Grievance Mechanism*) as well as channels for the reception and processing of such alerts, also in confidential or anonymous form, explicitly prohibiting retaliation against the whistle-blower.

The main channels for reporting include:

- > **Eni website:** <https://www.eni.com/it-IT/chi-siamo/governance/modulo-segnalazione.html>
- > **Via mail to:** segnalazioni@eni.com, or whistleblowing@eni.com
- > **By mail to the address:** Eni S.p.A, Internal Audit, P.le E. Mattei 1, 00144, Roma, Italy

Eni expects that also its Suppliers 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.

### MONITORING VIOLATIONS OF THE CODE

Eni reserves the right to initiate a process of verification of Suppliers' compliance with the content of this Code of Conduct whenever it deems it appropriate by requesting documents or carrying out on-site audits directly and/or through third parties.

Failure to comply with the principles of this Code may affect qualification as Eni supplier and result in Eni's interruption of its relationship with the specific Supplier depending on the circumstances and the severity of the violation; violations are analysed on a case-by-case basis and processed in accordance with all the internal procedures, the agreements and the applicable legal requirements.