

How to make a Whistleblowing Report?

#Report in good faith

#Your protection is guaranteed

#We protect your confidentiality

To learn more about it: please check out the Company Procedure "Management of Whistleblowing reports received by Eni S.p.A. and its Subsidiaries".



Who can report?

Eni's People and all those who act or have acted for or on behalf of or in the interest of Eni (e.g., Partners, shareholders, customers, suppliers of products or services, external auditors, consultants, agents, and so on) who report information on violations acquired within the work environment.

What can you report?

Conducts - referable to Eni's People or third parties acting on behalf of or in the interest of Eni - in violation of laws and regulations, Code of Ethics, 231 Models, Compliance Models, and internal regulations of the companies. Communications on circumstances other than those indicated above (e.g., complaints, claims or requests related to a personal interest, and so on) **are not treated as Whistleblowing Reports**.

Why shall you report?

Whistleblowing reports made in **good faith** can allow to timely identify and **remedy** unlawful conducts or other non-compliance that may **damage the interest and reputation** of Eni.

How can you report?

Whistleblowing reports should be sent through the **dedicated channels**, indicated in the box below, with preference given to the **web channel** through a suitable platform to ensure the confidentiality of the identity of the Whistleblower as well as the content of the Whistleblowing Report including the identity of the reported person. Eni's People who receive a Whistleblowing Report that has passed outside the provided channels, must inform the Whistleblower, if identified, of the opportunity to submit the Whistleblowing Report directly through the dedicated Platform and must forward it-informing the Whistleblower where possible- without delay and, in any case, within seven days, with any attachments, via the dedicated internal email address.

What should a Whistleblowing Report contain to enable subsequent verification activity?

The Whistleblowing Report to allow for effective and appropriate Follow-up, should be **based on precise and concurring** facts; therefore, it should be **circumstantial** and contain the **minimum information necessary** to enable the facts reported to be ascertained (clear and complete description of the fact, circumstances of time and place, generalities or other elements that would allow the identification of the person to whom the facts would be attributable, any other information that would provide objective supporting evidence).

Processing of Personal Data

The Personal Data will be processed in accordance with the **applicable data protection regulation**. Information on the purposes and methods of Personal Data processing by Eni is available at the following link: <https://www.eni.com/en-IT/governance/management-reports.html>

How does Eni proceed once the Whistleblowing Report is received?

Once the existence of the **necessary prerequisites** for the initiation of the investigation has been verified (e.g., circumstantiated Whistleblowing Report), an **internal team** with the requirements of competence, independence, and absence of conflict of interest, carries out the investigation of the reported facts so that Eni can assess and make the most appropriate decisions. The team also **provides** the Whistleblower with **updates** on the status of activities (e.g., acknowledgement of receipt, follow-up).

Anonymous Whistleblowing Report

Eni adopts a system aimed at **encouraging** the reporting of misconducts and **guaranteeing the confidentiality** of the Whistleblower and its **protection** from retaliatory consequences, and therefore it wishes that the identity of the Whistleblower would be explicit in the Whistleblowing Reports. **Anonymous Whistleblowing Reports** are still allowed (the protections in place for identifiable Whistleblower will obviously not apply to them).

Guarantee of confidentiality

Eni guarantees the **utmost confidentiality on the persons and facts reported**, as well as on the identity of the Whistleblower and, more generally, on the content of the Whistleblowing Report and related documentation, ensuring the adoption of disciplinary sanctions and other measures against anyone who violates this confidentiality.

Prohibition of retaliatory or discriminatory acts

All Eni's People are absolutely prohibited from taking on any **retaliatory or discriminatory acts** (e.g. dismissal, change of duties, suspension, and so on) against the **Whistleblower** and other protected persons for reasons related, directly or indirectly, to the Whistleblowing Report: foreseen punishments are disciplinary sanctions and other measures.

Illicit Whistleblowing Reports

The Procedure in place shall not be used to offend or harm the personal and professional honour and decorum of persons to whom the reported facts are related or to knowingly spread unfounded accusations. In the case of Whistleblowing Reports made in **bad faith or with gross negligence** (i.e. illicit), Eni will ensure the adoption of **disciplinary sanctions and other applicable measures**, including against the Whistleblower, or other initiatives to protect the persons concerned.

Channels for receiving Whistleblowing Reports

- The **Whistleblowing Platform** allows you to:
 - report **both in written and oral form**
 - receive feedback** and follow-up through a **KEY-CODE** (16-digit code)
 - monitor and update** the Whistleblowing Report after submission
 - for the **European Subsidiaries** equipped with a Proximity Channel, make the Whistleblowing Report on the company-specific channel ("proximity channel") or, alternatively, on the Eni one. For the Subsidiaries **not equipped with a proximity channel**, it is foreseen the sharing on the Eni channel.
<https://whistleblowing.eni.com/#/>

- Mailboxes/boxes**, in which to insert **paper documents**, are **established** where necessary by **individual Subsidiaries** in relation to the circumstances of the **specific case** (e.g., difficulties in accessing the Internet, and so on).

