



Our Operational-Level Grievance Mechanisms

Eni issued a procedure on Grievance Mechanisms in 2016 providing instruction on both the design and implementation of such mechanisms and the specific activities to be carried out when Eni receives, in writing or verbally, concerns or grievances in relation to its activities.

According to this procedure, to guarantee complainants' adequate access to the grievance mechanism, multiple access points should be established, and parties should be given adequate notice of the mechanism's establishment. Some examples of possible access points are: directly to the function responsible for receiving grievances (e.g. through a specially dedicated office of the company), by writing to a dedicated e-mail address, by letter, through the company website, through a dedicated telephone number, through trusted third parties (NGOs, local associations, etc.).

Moreover, the Human Rights-based approach is integrated into the procedure as demonstrated by two requirements explicitly stated into the document:

1. The mechanism must not hinder access to legal or administrative remedies;
 2. The actions and resolutions taken must be consistent with internationally recognized human rights.
- It should be highlighted that, in order to define the grievance mechanism's structure and implementation, a subsidiary's CEO may set up a consultation with local communities, especially if numerous concerns and/or grievances are anticipated. As per performance evaluation of grievance mechanisms, the procedure recommends that the local sustainability function assesses whether and how to make the evaluation results accessible to the local communities.

The process for managing complaints is made of the following key steps:

- After having received a concern or grievance, which may also be in local language and/or lodged anonymously, the function responsible for receiving grievances registers it by filling in a special form. The confidentiality of the person who has expressed the concern and/or grievance must always be ensured;
- When acknowledging that it has taken charge of the complaint, the function responsible for receiving grievances informs the complainant of the activities envisaged for handling the grievance and, where possible and appropriate, how long the complainants can reasonably expect until the conclusion of the grievance management process.
 - The local sustainability function examines the grievance and sends it to the function responsible for verification, who undertakes the necessary analysis and suggests the possible response; this process may or may not involve the complainants. If, based on this examination, the grievance can be considered major, the local sustainability function sends the proposal to the Eni's sustainability function, who then forwards the proposal to the head of the business function for approval.
- Once approved, the response is proposed to and discussed with the complainants. If accepted, the proposed resolution is signed by the complainants. If refused, the function responsible for verification may propose referring the case to a review committee (composed of Eni and community representatives) or to an independent third party.

- At the end of the process, the function responsible for receiving grievances must always provide a response to the grievances/concerns received, even if the checks have revealed that they are not associated with Eni's activities. The local sustainability function monitors the results and may request feedback from complainants on their level of satisfaction.

In the light of a pilot experience in Ghana carried out within an IPIECA project, a process of Grievance Mechanism implementation began in 2014; as of 2017, it is present in all Eni subsidiaries excluding holding companies or those providing financial and/or service activities.

The design and implementation of the operational-level grievance mechanism in Ghana was key to establish a channel of dialogue and build trust with the communities' members around the operational area, as well as to manage social risks and in terms of capacity building and lessons learned. Indeed, Eni engaged its Business Partners starting from the early phases of the project, sharing with them the commitment to comply with the IFC performance Standards. Institutions at different levels (central, regional and local as well as different groups of project-affected peoples (workers, fishermen, farmers) were also part of the stakeholder engagement activities, other than traditional authorities. Furthermore, experts from the IFC and the World Bank reviewed the mechanism and acknowledged that it was in line with the international standards.

A "community grievance mechanism assessment" involving 20 Eni subsidiaries was carried out in 2017 by an external consultant in order to assess the implementation process. The assessment underlined the importance, among other issues, of: simplifying the grievance mechanism recording forms; promoting integrated management of grievances in locations with multiple Eni organizations; further reinforcing Eni's role in non-operated assets and further clarifying the role of contractors and NGOs in the management of grievances.

As for Eni's expectations of Business partners in relation to the establishment of their own grievance mechanisms, the Sustainability Management System Guideline indicates that "The performance of counterparties must also be verified on the basis of human right violation risk factors, ensuring support for counterparties in improving their performance and encouraging the collection of reports from their employees".

Starting from 2018, grievances are recorded and managed through a web-based application called SMS. Data on grievances received in 2018 shall be available on the 2018 Sustainability report.