



**SLAVERY AND HUMAN**

**TRAFFICKING STATEMENT 2023**



# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023 \*

## INTRODUCTION

Eni's approach to human rights, including the prevention of modern slavery, builds on the dignity of every human being and the company's social responsibility to contribute to the well-being of individuals and communities surrounding its business activities. This vision goes beyond obtaining a social license to operate, and it is an integral part of Eni's identity and business. Indeed, Eni believes that companies must respect internationally

recognised human rights, as established in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Eni is committed to maintaining and improving its practices to combat slavery and human trafficking in its operations and along the supply chain. Eni expects its Business Partners to respect human rights, has zero tolerance towards human rights violations and expects its supply chain to comply accordingly.

## ENI'S BUSINESS

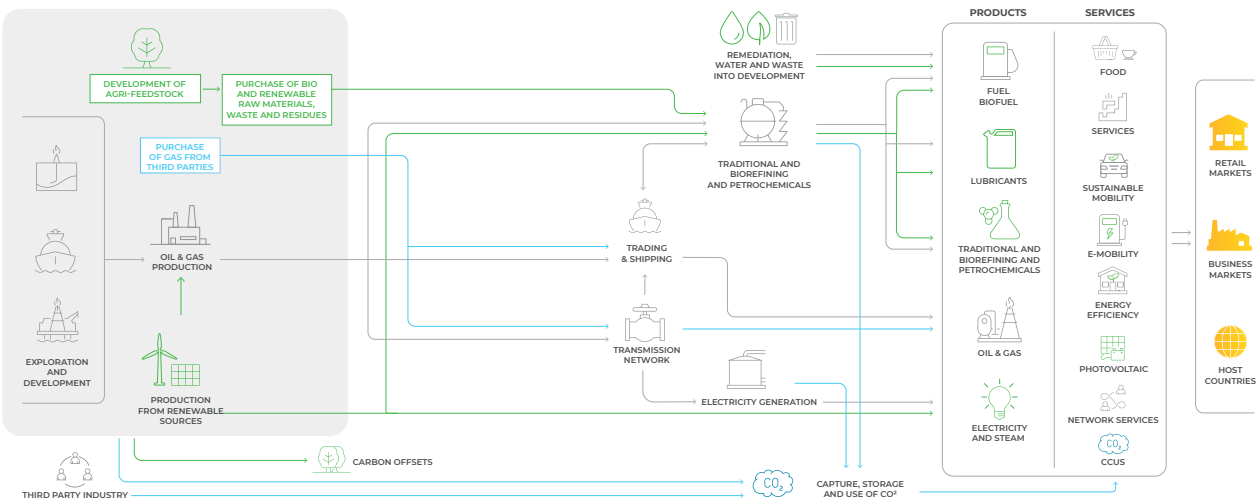
Eni is an energy tech company engaged in the entire value chain: from the exploration, development and extraction of oil and natural gas, to the generation of electricity from natural gas and renewable sources, traditional and bio-refining and chemical, and the development of circular economy processes. Eni extends its reach to end markets, marketing gas, power and products to local markets and to retail and business customers also offering services of energy efficiency and sustainable mobility. Consolidated expertise, technologies, geographical and energy sources diversification, alliances for development, as well as new business and financial models are Eni levers to effectively meet the challenge of a just energy transition, balanced and economically sustainable, while also maintaining a strong focus on value creation for shareholders.

Along this path, Eni is committed to become a leading company in the production and sale of progressively decarbonized energy products, increasingly customer-oriented.

### Eni's mission

*Eni is an energy company. We concretely support a just energy transition, with the objective of preserving our planet and promoting an efficient and sustainable access to energy for all. Our work is based on passion and innovation, on our unique strengths and skills, on the equal dignity of each person, recognizing diversity as a key value for human development, on the responsibility, integrity, and transparency of our actions. We believe in the value of long-term partnerships with the countries and communities where we operate, bringing long-lasting prosperity for all.*

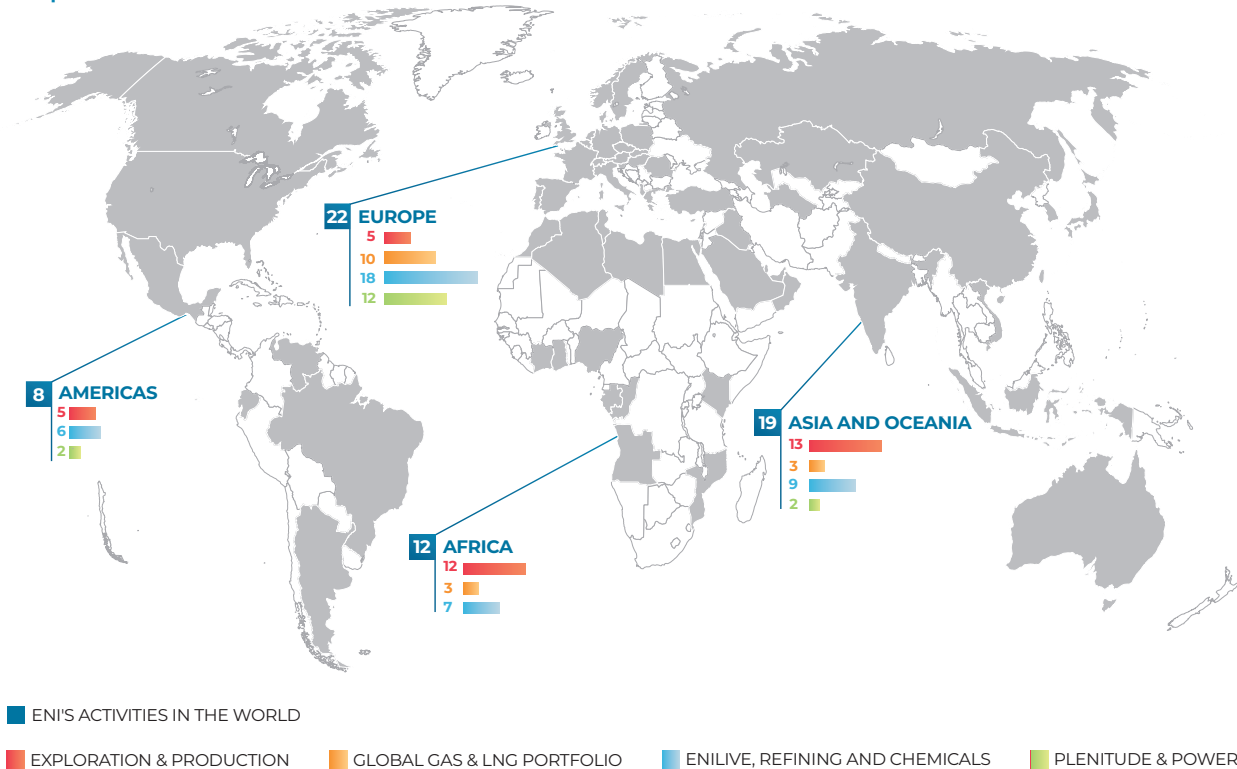
## OUR VALUE CHAIN



\* This statement refers to the entire Eni Group (herein referred to as "Eni", "it", or "its")

Eni employs more than 32,000 people in 61 Countries around the world.

**Eni's presence worldwide**

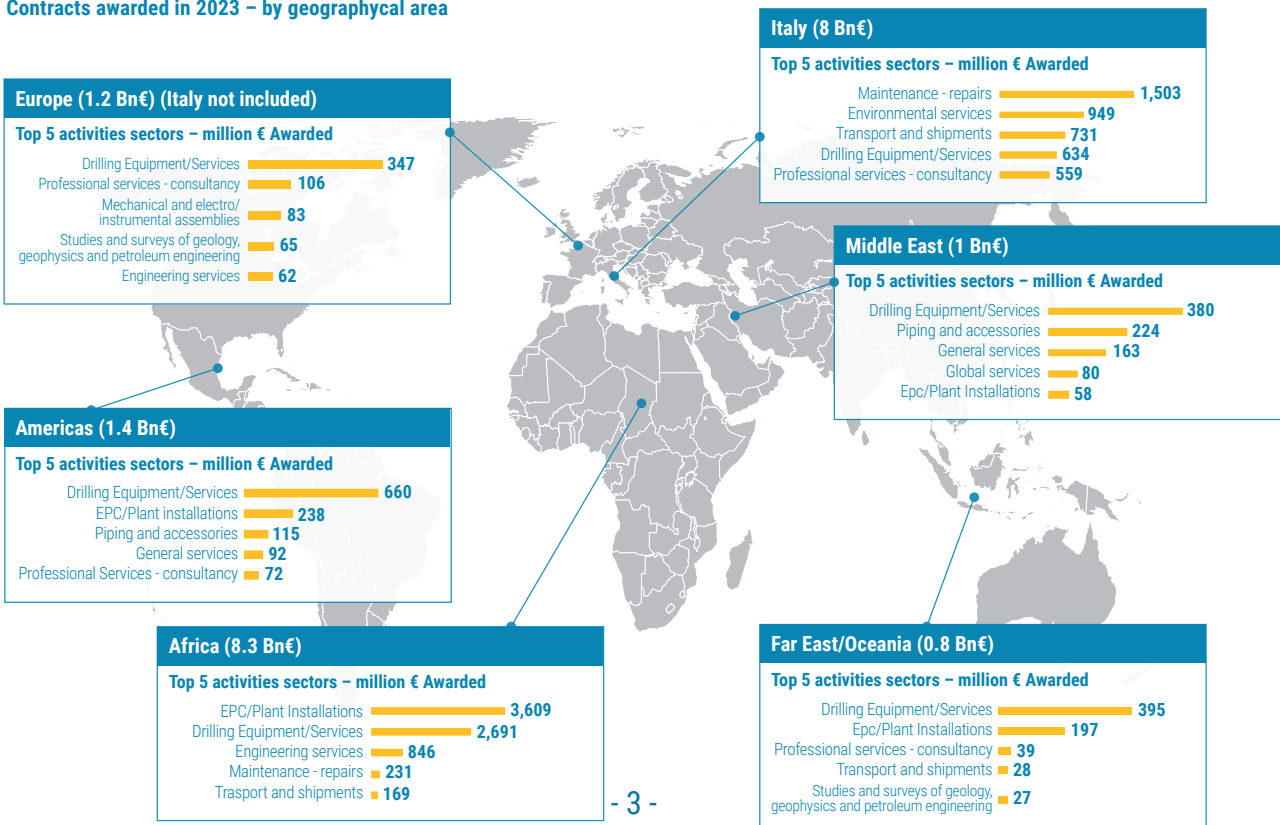


**Eni's supply chain**

Eni's operations are supported by a global supply chain that includes suppliers of goods, works and service from all over the world. The procurement expenditure in the Natural Re-

sources, Energy Evolution and Support Function business areas was approximately of 20.7 billion € in 2023, with 17,706 contracts awarded by the 36 procurement departments of the Eni Group around the world.

**Contracts awarded in 2023 – by geographical area**



## HUMAN RIGHTS POLICIES AND GOVERNANCE

### Corporate Governance: focus on human rights

Eni has set up a governance structure, identifying the Board of Directors of Eni SpA as the body responsible for defining - upon CEO proposal - the Company's strategy and objectives, including those related to sustainability and approving results.

Eni's SpA Board of Directors applies from January 1st, 2021, the Italian Corporate Governance Code, which identifies "sustainable success" as the objective that guide the actions of the Board of Directors and that consists of creating long-term value for the benefit of the shareholders, taking into account the interests of other relevant stakeholders. However, Eni has been considering the interest of stakeholders other than shareholders as one of the necessary elements Directors must evaluate in making informed decisions since 2006.

The CEO ensures the implementation of the Board's resolutions and periodically reports to the Board.

The Board also approves the most important internal rules, including the Code of Ethics, and the Policy "Respect for Human Rights in Eni".

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

- The definition of the general and specific guidelines for the Internal Control and Risk Management System of Eni.
- The periodic review of Eni's main business risks.
- The periodic evaluation of the adequacy and effectiveness of the Internal Control and Risk Management System of Eni.

With reference to the Four-Year Plan, the Board defines the nature and level of risk compatible with the strategic objectives of the Company on the basis of an estimate of risk probability and impact, provided by the Integrated Risk Management function (and, if necessary, updated during the year), including in its assessments all the elements that could be relevant for the Company's sustainable success.

With reference to Eni main risks - according to the Integrated Risk Management (IRM) model adopted - the results of the quarterly assessment/monitoring activities performed by IRM on such risks, along with treatment actions, are timely reported to the Board of Directors and control bodies (e.g. the Control and Risk Committee) in order to support corporate decision-making process. Human rights issues, even those related to supply chain, are included as a potential violation is detected when assessing the above risks and measuring their impacts.

The Sustainability and Scenarios Committee, within the Board, has the responsibility to advise the Board on scenarios and sustainability issues, including recommendations on human rights issues.

The Sustainability function of Eni SpA oversees the overall

day-to-day approach of Eni group to human rights supporting Eni group's business/staff functions in the evaluation of human rights matters arising within their processes. Indeed, the salient human rights issues identified by the Sustainability and Compliance functions of Eni SpA according to its due diligence process are clustered into four focus areas, each of them owned by a specific function. One of these focus areas is dedicated to the relationship with business partners along the supply chain.

The relevant local sustainability functions support those in charge of industrial projects and ensure the implementation of Eni's human rights due diligence at local level, including context-specific human rights issues.

### Policies and rules on human rights

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**.

The **Code of Ethics** 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 also inspires the model of organization, management and control. The Code of Ethics applies to all direct or indirect subsidiaries, both in Italy and abroad, and to all Eni's stakeholders. The Code was significantly updated on March 18th 2020.

The **Policy "Respect for Human Rights in Eni"** 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 Fundamental Guidelines of the Policy were approved by the Board of Directors of Eni SpA on 14th September 2023, and it replaces the Eni's Statement on respect for human rights.

The objective of the new Policy is to outline a single and cross-cutting model to ensure compliance and respect for human rights in the design of all corporate regulatory processes also considering the ongoing regulatory developments on the topic, capitalizing in a single document the important internal regulatory heritage developed by Eni over the years.

The document is structured in two sections: the first defines the principles on which Eni's commitment to respecting human rights is based, in particular the so-called "salient human rights issues" – the most important issues in consideration of the business activities and geographical areas of presence of the company, as well as outlining

the roles and responsibilities with reference to these principles; in the second section of the policy the due diligence model adopted is described in details.

Regarding the respect of the human rights in the workplace, the Policy includes a provision for the rejection of any form of forced or compulsory labour as well as any exploitative labour practices including, for example: human trafficking, restriction of freedom of movement and seizure of identity documents.

Eni expects third parties, own suppliers included, to commit to and observe the principles set out in the Policy and the specific commitments Eni has made. With the purpose of safeguarding the respect of human rights in the supply chain, Eni established procurement process that entails the adoption of an assessment model with a focus on human rights. Eni adopts processes to prevent human rights impacts and assesses its suppliers through a risk-based model, that, where necessary, foresees the implementation of corrective actions and their monitoring.

The **Global Framework Agreement** on International Industrial Relations and Corporate Social Responsibility (GFA), 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 GFA was lastly renewed in 2019 by Eni, the IndustriALL<sup>1</sup> Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL<sup>2</sup> trade unions, and it is now under renewal in 2024. The Parties of the Agreement annually meet to share information on certain issues including those pertaining to sustainability and human rights. In line with the Code of Ethics and Eni's corporate culture, which promotes inclusion and respect for uniqueness, in December 2021 Eni issued a policy against violence and harassment in the workplace. The **Zero Tolerance policy**, in accordance with the principles of the Geneva Convention of the International Labour Organisation, defines a broad perimeter of types of harassment that allows us 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 we can all feel protected and free to express ourselves.

Finally, the **Suppliers' Code of Conduct** 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 take action against modern slavery, child labour, discrimination in the workplace and for the protection of workers' rights in general.

Regarding the above-mentioned corporate policies and rules, Eni operates within the reference framework of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labor Organization, the UNGPs and the OECD Guidelines for Multina-

tional Enterprises.

## HUMAN RIGHTS DUE DILIGENCE AND RISK MANAGEMENT

Eni's approach to human rights due diligence is described in the Policy "Respect for Human Rights in Eni".

In line with the UNGPs and the OCED Guidelines, the due diligence is set on an iterative (not once-off) process, context-specific and covers the entire spectrum of human rights implications for Eni; it is designed to be multidisciplinary, multilevel, and integrated at any level of the company's processes. It follows a risk-based approach to identify, prevent, mitigate, and account for adverse corporate impacts on human rights. The risks identified through the due diligence are defined as risks to rightsholders.

Eni has been developing and implementing different approaches and processes aimed at identifying impacts on human rights, including ones linked to the workforce management – direct and indirect (in the supply chain), such as modern slavery and human trafficking.

Further, risks of potential human rights impacts, including the modern slavery, are mapped also by 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. A third-party provider (Verisk Maplecroft) is used to evaluate the human rights risks of the Countries.

### Assessing and managing risks related to direct workforce

Eni is aware that in some Countries of operations relevant risks related to human rights impacts can be detected, included modern slavery. Conscious of this, Eni has in place an articulated framework of policies, management models, contractual clauses, and practices to be adopted by Eni's subsidiaries<sup>3</sup> - in line with the commitments undertaken by the parent company in the Code of Ethics and in the Policy Respect for Human Rights in Eni – which allow to effectively manage these risks in direct workforce management.

In 2020, a risk-based model for assessing respect for human rights in the workplace was introduced aimed at segmenting Eni's companies based on quantitative and qualitative parameters aimed at outlining issues and risks of the country/operating context that are linked to the human resources management process, including contrasting all forms of discrimination, the recognition of gender equality, fair working conditions, freedom of association and collective bargaining.

This approach identifies possible areas of improvement, requiring specific actions to be defined and monitored over time.

1. Organization that represents more than 50 million workers distributed in 140 Countries, in the energy, manufacturing and mining sectors.

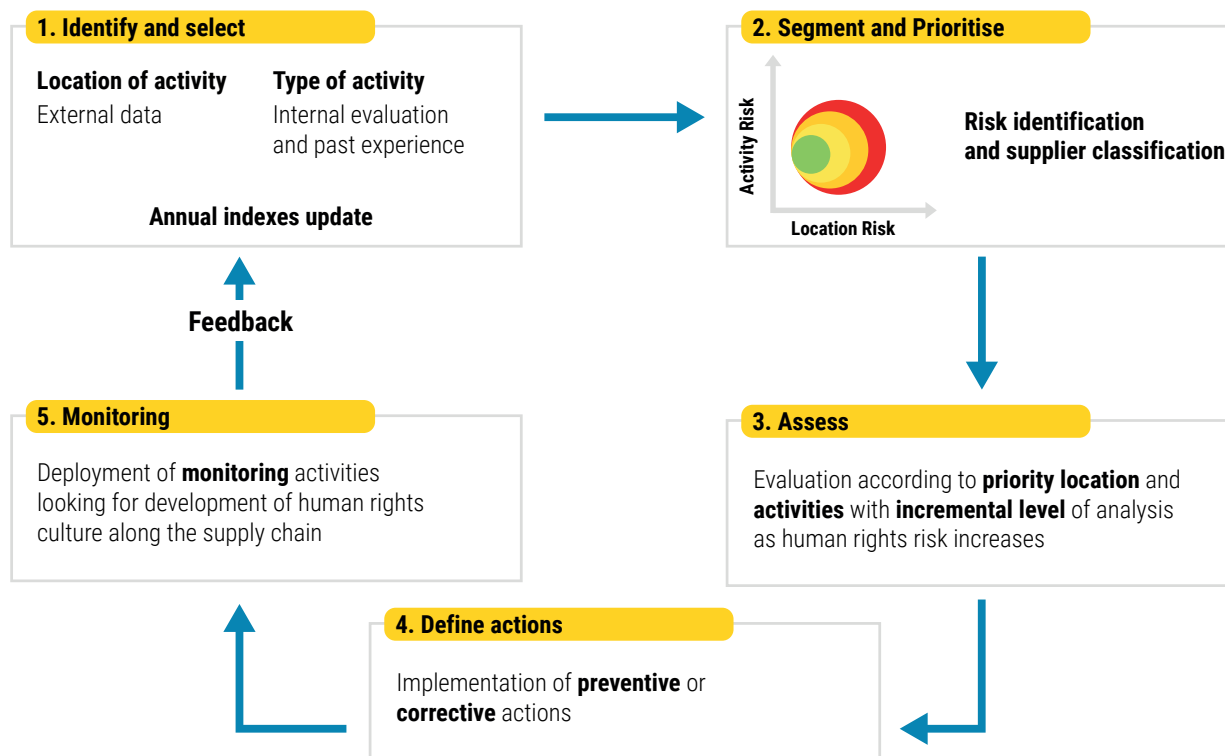
2. Main Italian trade union organizations of the energy sector.

3. Operating independently and having determined on the implementation modalities of those policies for themselves on the basis of the relevant context.

**Assessing and managing risks along the supply chain**  
 Respect for human rights along the supply chain is carried out through the Eni procurement process by adopting an

evaluation model based on human rights as well as transparent and impartial conduct in selecting suppliers.

**Eni's approach to assess and manage risks along the supply chain**



Eni applies the human rights risk-based model through which suppliers are monitored throughout the procurement process to assess and manage human rights along the supply chain. The risk model evaluation is based on an objective and transparent approach, leading to a supplier's classification according to the potential risk of human rights impacts. Such risk is deduced considering the supplier's Country and the type of performed activity.

The model allows Eni to improve and strengthen the attention to respect for human rights in the riskiest geographical areas in which Eni operates. Applying the risk-based model, in 2023, Nigeria, Iraq and Libya had the highest number of suppliers at risk. The model provides for differentiated control methods related to the different risk levels (the higher the risk of the supplier, the higher the level of detail of the assessment) inspired by international standards such as SA8000.

In the procurement process the suppliers are subject to a continuous evaluation through:

1. Subscription of the Supplier Code of Conduct: 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, among

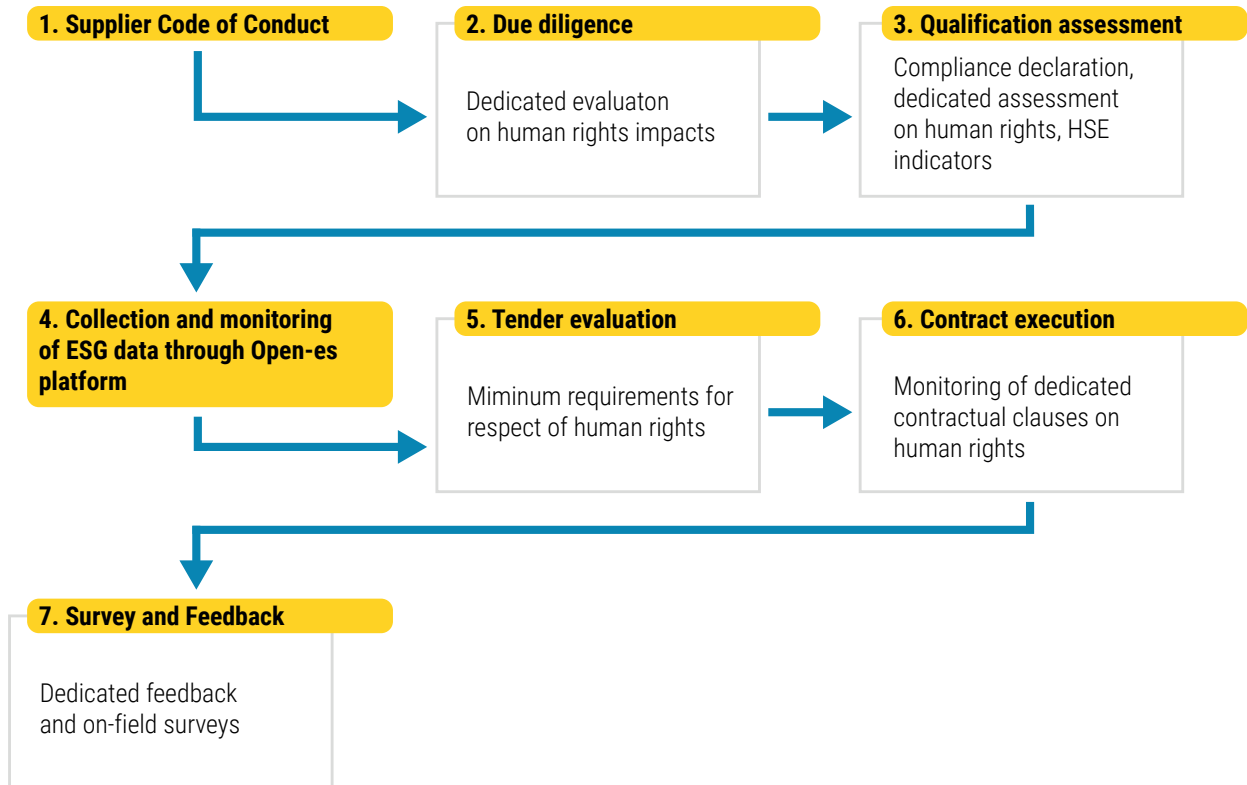
which human rights are. The Supplier Code of Conduct represents a commitment in recognizing and protecting the value of all its own people, operate with integrity, protect company resources, promoting the adoption of such principles in their own people and their supply chain.

2. Due Diligence verifications about involvements in human rights impacts, carried on independently based on the supplier's human rights risk level by open-source information.
3. Periodical qualification assessment based on performance indicators, documental or on-site audits and dedicated questionnaires to minimise the risks of human rights impacts.
4. Collection and monitoring of ESG data and information, including the ones related to human rights management, through the Open-es platform.
5. Adoption and evaluation of human rights minimum requirements during Tender phase, particularly in the case of activities with potential high human rights risk.
6. Evaluation and monitoring during contract execution of Eni's contractors and subcontractors by also on-site audits with the aim of preventing any forms of modern slavery such as forced labour, child labour, discrimina-

tion or inequal wages.

- Feedback processes with focus analysis on respecting human rights and requests to implement improvement actions if there are critical issues. If minimum standards of acceptability are not met, the supplier may be excluded from Eni vendor lists and all business is interrupted.

The result is a comprehensive approach for risk identification, prevention, and mitigation in every stage of the procurement process, from the supplier selection to the tender evaluation and performance monitoring along the entire supply chain.



By applying the risk-based model, in 2023, Eni has reached the target of more than 6,000 suppliers assessed on social responsibility, including respect for human rights, to prevent the risk of human rights impacts along Eni's supply chain. In addition, during 2023, more than 450 in-depth human rights evaluations were carried out through documental and onfield audits, an increase of 30% compared to 2022 audits. In such activities, 29% of the cases led to improvement plans for the companies involved. In contract execution phase more than 3,000 feedback questionnaires have been evaluated with 7 of them related to potential impacts on human rights. The suppliers with critical situations were limited in the participation to Eni tenders and a corrective action plan was agreed with them to prevent the recurrence of the events that led to the negative evaluation and to ensure respect for human rights. **The in-depth assessment revealed that none of them were related to modern slavery issues.**

Finally, in line with the principles of "responsible contracting" suggested by the best practices and international

guidelines on Business & Human Rights, Eni has prepared a series of standard clauses on human rights compliance to be included on the basis of a risk-based approach in the main Eni contractual typologies, and provides support to the business for their negotiation. These clauses, which can be supplemented and adapted to the case in point, 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).

#### Assessing and managing risks with security providers

The human rights issues potentially deriving from private security forces working for Eni, modern slavery included, are assessed by a risk-model updated in 2023. The model considers specific parameters, split into clusters based on "Context elements" and "Eni's presence in the area". In the first group there are Security Country Threat param-



ter and Human Rights Risk parameter (the risk of human rights is a component of the ethical threat). An external provider assigns both the Security Country Threat and Human Rights Risk. In this first cluster there is also an index, named "Security Forces and Human Rights"<sup>4</sup>, which measures the risk of business complicity in human rights impacts caused by private and/or public security forces. The index measures the effectiveness of state security forces as well as the involvement of both state and private security forces in human rights impacts.

### Assessing and managing risks in industrial projects

Concerning business projects by Eni, the company has adopted a risk-based model, which classifies upstream projects according to their potential human rights risks. The model considers a mix of parameters connected to the operating context, 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 specifically investigated through a "Human Rights Impact Assessment" (HRIA) or "Human Rights Risk Analysis" (HRRRA) – the latter carried out according to a desk-based analysis methodology developed in 2021 – to identify measures to prevent potential impacts on human rights and manage the existing ones. In 2023, the HRIAs in Congo and Kenya on the agrifeedstock activities for the production of biofuels<sup>5</sup> were finalised, identifying recommendations aimed at mitigating potential negative impacts, also by engaging in 2022 more than 1,000 people from local communities in surveys and meetings, as well as NGOs, Trade Unions representatives and other Institutional stakeholders. Such recommendations will be addressed in specific Action Plans to be implemented in 2024.

During the year, the Action Plans of the previous assessments were also implemented and monitored, in particular: a follow-up assessment was carried out in Mexico to evaluate the effectiveness of the three-year Action Plan adopted following the HRIA conducted in 2019; the Action Plan referred to Mozambique was finalised. Most of the HRIAs and HRRAs reports conducted and the related Action Plans adopted, including periodic reports on the progress of such Plans, are publicly available on the Eni website<sup>6</sup>. The Action Plans adopted include several actions to prevent any risk of modern slavery, among others: reinforced labour rights requirements have been added in the contracts with the suppliers providing primary services, new on-field checks, audits, and monitoring activities.

### ASSESSING EFFECTIVENESS

Eni is committed to continuously improving its monitoring and evaluation processes applied to human rights issues. Within this context, KPIs are used to monitor the effective-

ness of Eni's efforts to prevent human rights impacts, also in terms of modern slavery practices.

In 2023, relevant KPIs related to staff training, suppliers' assessments, critical issues, and any human rights impacts, as well as whistleblowing events, were monitored in continuity with the previous years and drove Eni's actions to improve the framework of policies, management models, contractual clauses, and practices concerning the human rights related impacts. Data and figures regarding performance are available in the 2023 Annual Report, in the Sustainability Report "Eni for A Just Transition" and in the Report "Eni For Human Rights".

This mechanism also allows Eni to set out annually specific targets, which are embedded in the objectives assigned to the management in charge of the processes more at risk regarding human rights impacts.

The Sustainability Department is responsible for proposing and monitoring progress in such Management Objectives, including respect for human rights in the supply chain.

The internal audit program is also highly relevant for assessing the effectiveness of the internal regulation and its application to human rights.

Periodically, at least once a year, the approach towards modern slavery and broadly on human rights is reported to the Sustainability and Scenario Committee.

### 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. 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 is organized in a diversified strategy along four guidelines:

1. General courses on Business and Human Rights for all Eni people.
2. Specific courses on topics and areas particularly exposed to risks of negative impacts.
3. Training initiatives on issues closely linked with human rights (e.g. Code of Ethics, HSE, etc.).
4. Training courses on Security and Human Rights.

In 2022, the three-year training cycle on the specific courses on topics and area particularly exposed was completed with a participation rate of 97% of the target population (senior managers and middle-managers in Italy and abroad). In 2023 these modules were made available to all Eni's employees in addition to the general courses on business and human rights.

4. This indicator is provided by the database of Verisk Maplecroft, a leading research firm specialising in global risk analytics, country risk insight & trusted advisory.

5. <https://www.eni.com/en-IT/circular-economy/biofuels-africa.html> <https://www.eni.com/en-IT/circular-economy/biofuels-africa.html>

6. <https://eni.com/en-IT/just-transition/respect-for-human-rights.html>



During the last three years, more of 38,000 hours of training were provided among staff and middle and top managers on human rights program. To specifically raise awareness about human rights risks along the supply chain, a specific training module was addressed to Eni's Procurement professionals. Participants were trained on modules shaped on two case studies: 1) the first one addresses the topics of working conditions, working hours and vulnerable workers; 2) the second one is focused on modern slavery practices such as wage deductions and passport retentions. Both case studies terminate with a description of Eni's expectations in terms of both remedy for abused workers and approach with the supplier. Moreover, Eni invites suppliers to participate in training sessions, led by internal and external professionals, to raise awareness on social issues, including workers' rights.

Furthermore, to promote the respect and management of human rights along the supply chain, during 2023, virtual training programmes and workshops were dedicated to colleagues dealing with the management of foreign suppliers. They also received dedicated training on the human rights evaluation model in procurement process.

An online course on labour rights, structured on 12 modules and developed with IPIECA, 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 these rights.

Eni also engaged suppliers and companies in other awareness and development initiatives through programs for:

- **Measurement and Improvement:** through the 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 17,000 companies and 20 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. For Eni's procurement process, participating in Open-es is an essential requisite to evaluate and valorize suppliers' commitment in enhancing their competences on ESG topics such as managing and mitigating human rights risks like child labor and forced labor.
- **Financial Support:** Eni assists suppliers through programs such as the "Basket Bond - Sustainable Energy" and "Sustainable Supply Chain Finance." The latter, initiated in 2023, allows suppliers to request early invoice payments without impacting their credit lines, thereby promoting ESG profile enhancement through synergy with Open-es.
- **Enhancement:** Eni acknowledges excellence through

the HSE & Sustainability Supply Chain Award, sharing ESG best practices and rewarding companies with outstanding performance and innovative projects. In 2023, Eni launched the "Inclusion Development Partnership" program to create a more inclusive and diversified supplier chain, increasing the participation of underrepresented group-owned enterprises in procurement bids.

Another initiative concerning the services providers is the Training Program on Human Rights and Security, which has been delivered to public and private Security forces. The above-mentioned Program has been running since 2009 with the participation of Security provider, in Italy and globally, and will continue to involve Countries in which Eni operates. Training sessions have been held in 15 Countries in last 14 years.

## WHISTLEBLOWING AND GRIEVANCE MECHANISMS

Eni people - as well as all those who operate or have operated in Italy and abroad in the name of or on behalf of or in the interest of Eni, each within the scope of their functions and responsibilities - can report any wrongdoing which extends to human rights impacts, including modern slavery, as described in the internal regulation "[Whistleblowing Reports received by Eni SpA and its subsidiaries](#)"<sup>7</sup>, in full confidence and without fear of retaliation. All the whistleblowing reports received are fully investigated and disclosed with the related appropriate remedial actions taken. Annual information about whistleblowing reports received and actions taken is published in Eni's Annual Report, in "Eni for Performance" and on the website<sup>8</sup>.

Among the issues received through the whistleblowing channel in 2023, **Eni has identified no case of modern slavery**. However, for the sake of completeness, Eni received reports of late or partial payment of wage and overtime by suppliers to their personnel. All the reports received were managed according to the whistleblowing procedure and for the single report proved founded, remediation measures have been applied, including: summoning suppliers to pay workers of monies owed; reviewing the status of the supplier qualification with the adoption of contractual remedies where applicable; reinforcing processes for the monitoring of suppliers' conduct.

Moreover, operational-level **Grievance Mechanisms** are defined based on a proactive and structured approach to receive, recognize, investigate, respond, and resolve complaints from individuals or groups of individuals in a timely, planned, and respectful manner. These Grievance Mechanisms makes it possible to manage risks and foster a positive relationship with stakeholders, as well as provide remediation in case of non-compliance. **No grievances were received in 2023 referring to modern slavery**. Details are available in "Eni for A Just Transition" and "Eni for Human Rights".

7. Updated recently on March 2024.

8. <https://www.eni.com/en-IT/about-us/governance/notifications.html>

## MULTI-STAKEHOLDER INITIATIVES

Engagement with representatives of rights-holders is an essential activity of Eni's human rights approach. The annual meeting with the IndustriALL Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL trade unions envisaged within the GFA, for example, is a key opportunity to share information on Eni's performance, actions and plans concerning HSE and Sustainability (including main HSE indexes related to employees and contractors), reports or grievances relating to human rights issues (if any) and positive actions in favor of non-discrimination.

Furthermore, Eni builds long-term relationships with renowned human rights experts and organizations to reach multiple goals ranging from undertaking joint actions to improving its understanding of cutting-edge topics, from contributing to the debate on Business and human rights to exchanging lessons learned and best practices.

On 8 December 2022, Eni obtained the status of "Full Member" of the Voluntary Principles Initiative (VPI), the multi-stakeholder initiative that involves the main energy companies in the protection and promotion of human rights; this status establishes the definitive recognition of the efforts made by Eni in human rights issues. The result comes from a work lasted more than two years. In 2020, in fact, Eni obtained admission to the Voluntary Principles Initiative as an "Engaged Corporate Participant". In the following two years, Eni proved the broad commitment to these Principles, by all the Functions involved in their application, and the dissemination of them through a lot of actions; among these the drafting of periodical Annual Report, the organization and application for the VPI of the "Conflict Analysis Tool" and the organization of training courses on Security & Human Rights.

Moreover, Eni is an active member of IPIECA<sup>10</sup> participating, among others, to the Social Responsibility Group, the Human Rights Working Group (HWG) and the Supply Chain Working Group (SCWG), where most relevant issues for the industry are discussed and guidance are prepared. Within this context, Eni collaborated in preparing the guidance "Labour rights risk identification in the supply chain"<sup>11</sup> and its related operating tool, as well as the training platform for suppliers and contractors described in the previous paragraph. Finally, Eni is a member of the UN Global Compact, and the World Business Council for Sustainable Development and actively takes part to workstreams on labour related topics.

## CONSULTATION

Eni's organizational and business structure has highly integrated its policies and processes, which stem from Eni SpA and are applied across the Eni Group. All Eni Group's subsidiaries, including but not limited to those falling within the scope of application of the relevant slavery state-

ment laws, adopt Eni's central policies, including the present Modern Slavery Statement. The Board of Directors of each subsidiary adopts this Statement and publishes it on its website, if available, or maintains it on file to respond to any requests from interested stakeholders.

Efforts to prevent slavery risks within and around the company similarly consist of an integrated process involving the collaborative work of various specialised units and departments. These include the following functions: Sustainability, Compliance, Internal Audit, Procurement, Risk Management Integrated, Human Resources, Governance, Security, and Eni Corporate University. Under the Sustainability Function's lead, each of these units and departments was involved in preparing and drafting this Statement to ensure that the document reflects accurate and updated information. Moreover, the human rights due diligence model, adopted by Eni SpA at the central level and managed by the Sustainability Function, operates through integrated information flows from internal functions and Group's subsidiaries to the Sustainability Function. This includes, for instance, the involvement of the Internal Audit Function in the quarterly analysis of whistleblowing reports received concerning human rights and the evaluation - in consultation with the subsidiaries - of potential remedial measures, the analysis carried out by the procurement function of any potential risks identified in the activities carried out by suppliers and the evaluation - also with the support of the subsidiaries - of remedial measures. Another example is the collaborative work of various functions, including Compliance, Negotiations and the subsidiaries, to include standard human rights clauses in all contracts with third parties (including Joint Operating Agreements and Petroleum Contracts), which require, among other things, all Parties to such agreements to avoid/prevent child labour, forced labour, and slavery practices as well as ensure decent work conditions and labour rights.

## MOVING AHEAD

Eni is taking note of legislative developments occurring at both national and regional EU level in relation to human rights due diligence, such as the proposals for a Regulation prohibiting products made with forced labour on the European Union market and the Directive on Corporate Sustainability Due Diligence. Eni has long been structuring and implementing human rights processes in line with international standards and best practices, with a particular focus on the United Nations Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises, from which the European Commission's Proposal draws inspiration. Eni has therefore been laying the groundwork to further strengthen such processes in anticipation of any new applicable laws that will be adopted in business and human rights.

The aforementioned regulations are the foundations of the ongoing process started with the adoption of the Eni Policy

10. Association of sustainability on environmental and social issues in the Oil & Gas sector.

11. <https://www.ipieca.org/resources/good-practice/labour-rights-risk-identification-in-the-supply-chain/>

on respect for human rights which aims at design a human rights compliance program focused on a risk-based approach to respect human rights in all Eni's processes. In 2024 Eni will carry out an in-depth analysis with the aim of updating the list of salient human rights issues and impacts given the adoption of the new Policy and the evolution that has taken place in terms of business model and activities compared to the list previously identified. Eni will continue to promote training initiatives among employees and suppliers to stren-

gthen awareness and share knowledge on respect for human rights and issues related specifically to modern slavery. Regarding the procurement process, Eni is committed to keep 100% of new suppliers assessed according to social criteria to ensure effectiveness of the human rights assessment and monitoring process associated with the risk-based model described above. Eni is also committed to reach 100% of worldwide strategic suppliers assessed on the sustainable development pathway by 2025.

This statement refers to the entire Eni Group<sup>12</sup> in accordance with the UK Modern Slavery Act 2015, in particular with Article 54, and the Australian Modern Slavery Act 2018, in particular with section 14. It describes the steps taken by Eni during 2023 to prevent slavery and human trafficking in its supply chain or in any part of its own business<sup>13</sup>. In the Annex are listed the Group's companies for which there is a disclosure obligation according to one or both of the regulation (UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018).

<b>UK Modern Slavery Act (2015) – recommended criteria</b>	<b>Australian Modern Slavery Act (2018) – mandatory criteria</b>	<b>Eni's Slavery and Human Trafficking Statement</b>
Organisation's structure, its business and its supply chains.	Identify the reporting entity.	<i>Eni's business and supply chain</i>
	Describe the reporting entity's structure, operations and supply chains.	
Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk	Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	<i>Human rights due diligence and risk management</i>
Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	<i>Human rights policies and governance Human rights due diligence and risk management Training and awareness Whistleblowing and grievance mechanisms</i>
Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	<i>Assessing effectiveness</i>
	Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls	<i>Consultation</i>
	Any other relevant information	<i>Moving Ahead</i>

This Statement has been approved by the Board of Directors of Eni S.p.A., April 23<sup>th</sup>, 2024.

This Statement was approved by the Board of Directors of Eni Trade & Biofuels S.p.A. on May 20<sup>th</sup>, 2024.

/s/ Alessandro Gaeta

*Alessandro Gaeta  
CEO of Eni Trade & Biofuels S.p.A.*

/s/ Claudio Descalzi

*Claudio Descalzi  
CEO Eni SpA*

*Date: 23<sup>th</sup> April 2024*

12. Eni Group refers to the parent company Eni S.p.A. and its consolidated subsidiaries as identified in the Annual Report.

13. Annex A lists Eni subsidiaries that fall within the scope of application of the Modern Slavery Act 2015 and/or the Australian Modern Slavery Act.

## **Annex A**

### **LIST OF ENTITIES FALLING WITHIN THE SCOPE OF APPLICATION OF THE UK MODERN SLAVERY ACT 2015 AND/OR AUSTRALIA MODERN SLAVERY ACT 2018 AND REQUIRED TO COMPLY WITH THE REPORTING OBLIGATIONS THEREUNDER (WHO THUS FORMALLY ADOPT ENI SPA STATEMENT BY THEIR OWN BOARD OF DIRECTORS' RESOLUTION):**

*Versalis S.p.A.; Versalis UK Ltd.; Versalis International SA (branch UK); Eni International B.V.; EniProgetti S.p.A.; Eni International Resources Ltd; Eni Global Energy Markets SpA; Eni Trade&Biofuels SpA; Finproject SpA; Finproject India pvt Ltd; Foam Creations (2008) Inc.; Foam Creations Mexico Sa de CV; Eni UK Holding Plc; Eni UK Limited; Eni JPDA 03-13 Limited; Eni Australia BV; Eni Plenitude SpA Società Benefit; Burren Energy (Egypt) Limited; Burren Energy India Limited; Burren Energy Plc; Eni Ambalat Limited; Eni Arguni I Limited; Eni Australia Limited; Eni BTC Limited; Eni Bukat Limited; Eni CBM Limited; Eni Côte d'Ivoire Limited; Eni East Ganal Limited; Eni East Sepinggan Limited; Eni Elgin/Franklin Limited; Eni Ganal Limited; Eni Hewett Limited; Eni Hydrocarbons Venezuela Limited; Eni India Limited; Eni Indonesia Limited; Eni Investments plc; Eni In Amenas Limited; Eni IS Exploration Limited; Eni Krueng Mane Limited; Eni Lasmo plc; Eni Liverpool Bay Operating Company Limited; Eni LNS Limited; Eni Middle East Limited; Eni North Ganal Limited; Eni Oil Algeria Limited; Eni Rapak Limited; Eni TNS Limited; Eni UHL Limited; Eni UKCS Limited; Eni ULT Limited; Eni ULX Limited; Eni West Ganal Limited; Eni West Timor Limited; Eni Yemen Limited; Liverpool Bay CCS Limited; Bacton CCS Limited; Eni CCUS Holding Limited; Eni Peri Mahakam Limited; Enilive SpA.*