

ECG Policy

# Diversity and Inclusion



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*The English text is a translation of the Italian. For any conflict or discrepancies between the two texts the italian text shall prevail*

# A. FUNDAMENTAL GUIDELINES

## ■ A.1 INTRODUCTION

### A.1.1 Management Summary

#### ECG SUBJECT AREA IN THE STRATEGIC CONTEXT OF ENI

Eni's mission recognises diversity as a key value for human development.

Eni supports a just energy transition, with the objective of preserving the planet and promoting efficient and sustainable access to energy for all. Eni's work is founded on passion and innovation; on the strength and development of individual skills; on the equal dignity of people.

In consistency with the above statements, integrating the principles of diversity and inclusion into corporate processes helps enhance the well-being of all Eni people as individuals and as part of the corporate system, and generates a greater drive towards innovation and sustainable development and stimulates individual contribution in an increasingly inclusive organization.

Diversity and inclusion are therefore essential in order to create a work environment that prohibits any distinction, exclusion or preference based on colour, gender, religion, ethnic origin, political opinion, social origin or national ancestry, disability, gender identity, sexual orientation, social status, age or any other condition of the individual that has the effect of nullifying or impairing equal opportunities or treatment in terms of annul employment or profession. Eni also does not tolerate any form of discrimination regarding any uniqueness listed above and is also committed to guaranteeing the right to non-discrimination of persons with family responsibilities, in line with ILO Convention No. 156.

Eni's commitment, the management model and the activities carried out in the area of D&I are developed in accordance with i) the Code of Ethics, which guarantees a work environment free from any form of discrimination based on valuing the diversity and which considers people as the starting point and the goal of every action, and ii) the ECG Policy "Respect for Human Rights in Eni", with priority given to issues considered most significant for the company, in light of the business activities carried out and the contexts in which the Company operates.

Eni adheres to the United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, the ten principles of the United Nations Global Compact and the International Finance Corporation (hereafter IFC) Performance Standards, the 1998 ILO Declaration on Fundamental Principles and Rights at Work and the Sustainable Development Goals of the United Nations 2030 Agenda.

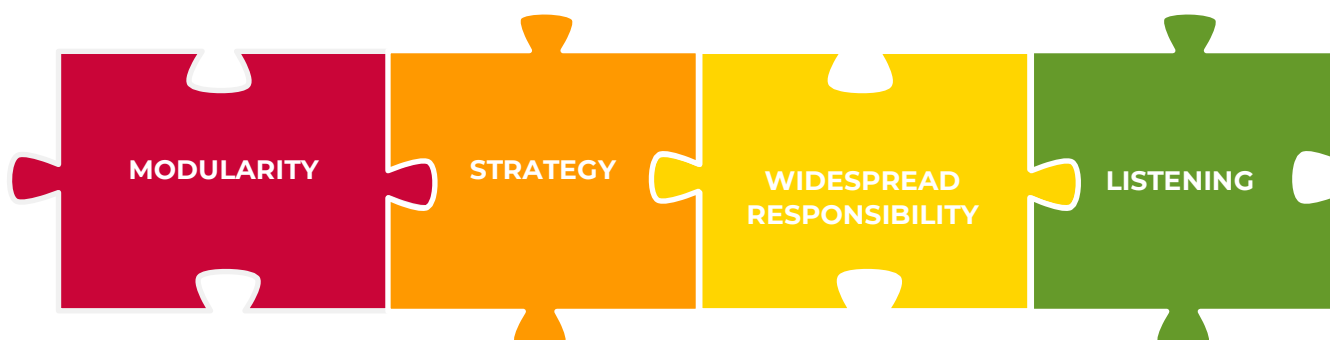
In 2021, Eni signed up to the United Nations Women's Empowerment Principles (WEP), as part of its commitment to promote gender equality and women's empowerment in the workplace, business practices and society.

## PURPOSE OF THE D&I MODEL

The model that Eni has adopted for Diversity and Inclusion is designed to achieve the following purposes:

- Ensure an approach that integrates D&I into all company activities and external relations with third parties.
- Describe the interface and interrelationship logic of the roles and responsibilities identified within the D&I process.
- Describe the approach taken in implementing the initiatives identified for D&I management.
- Illustrate the logic used to measure the outcomes of the initiatives implemented and how they can be updated with a view to continuous improvement.

## CHARACTERISTICS OF THE D&I MODEL



### **Modularity**

The D&I model develops a modular approach aimed at the gradual launch of a set of transversal actions – designed to support the development of a culture of valuing uniqueness – and targeted actions to meet the needs of specific targets identified as priorities.

### **Strategy**

The D&I model translates the business strategy into objectives and actions that aim to create an inclusive work environment, to encourage internal adherence and sharing and achieve a distinctive advantage that can be communicated to the market.

### **Widespread responsibility**

The D&I model aims to encourage widespread involvement and progressive individual responsibility through a set of initiatives that support the development of a culture of diversity and inclusion. It operates in an integrated manner with other functions, taking into account Eni's organizational complexity, enabling it to exploit synergies with processes, make actions more efficient and maximize results, with a view to building and spreading an increasingly inclusive corporate culture.

## Listening

The D&I model is based on listening to Eni people, which enables it to capture their needs and requirements with a view to continuous improvement of actions to promote a culture of inclusion. The objective is to adopt the necessary tools to collect and analyse all available information using a dynamic approach, capable of responding rapidly to opportunities and challenges emerging from the environment in which Eni operates, through continuous evolution and adaptation to new organizational needs.

For the implementation of the initiatives and in line with the guidelines set out above, a process has been defined to identify, implement and monitor D&I initiatives and is described below.

The Fundamental Guidelines of this ECG Policy were approved by the Board of Directors of Eni SpA on 26 October 2023.

### A.1.2 Area of application and transposition modalities

This ECG Policy is for immediate application by Eni SpA and applies to its subsidiaries<sup>1</sup> subject to transposition in the manner described in the “Regulatory System” Policy.

In particular:

- unlisted subsidiaries and their subsidiaries ensure transposition without possible waiver<sup>2</sup> promptly and in any case no later than 30 March 2024;
- the subsidiaries with listed shares (hereinafter “listed subsidiaries”) and their subsidiaries receive this document and transpose the Fundamental Guidelines, without possible waiver<sup>3</sup> and the Application Modalities, with the possibility of adaptation as a result of specific regulatory constraints and the need to adapt to the company’s roles and responsibilities, after informing the Process Owner.

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<sup>1</sup> As defined in the “Regulatory System” Policy.

<sup>2</sup> Unless specifically required for companies in regulated sectors that are subject to supervision by specific authorities and in the event of conflict with local regulations.

<sup>3</sup> Unless specifically required for companies in regulated sectors that are subject to supervision by specific authorities and in the event of conflict with local regulations.

## ■ A.2 REFERENCE PRINCIPLES AND ACTIVITIES AT RISK

The activities governed by this document must be carried out in compliance with the Code of Ethics, with the general transparency standards and specific control standards set out in the Eni Model 231, as well as the Compliance Models on corporate administrative liability for Eni's subsidiaries, the transversal reference principles set out in the Regulatory System Policy, and the specific reference principles and commitments undertaken by Eni, listed below:

### ENHANCEMENT OF DIVERSITY

Eni is committed to recognizing the expression of individual characteristics, considering people as identities that are distinct from each other in order to establish a work environment that implements all necessary actions to prevent discrimination in relation to the following characteristics of an individual: colour, gender, religion, ethnic origin, political opinion, social origin or national ancestry, disability, gender identity, sexual orientation, social status, age or any other form of diversity contemplated by international law. Eni supports the development of an international business based on fairness, dignity, equal opportunities, dissemination of ethical values, enhancement of diversity, integration and non-discrimination.

### EQUITY

Eni is committed to ensuring a physically and socially fair work environment through compliance with the rules relating to the principle of equity towards all its employees. Eni provides each person with the necessary tools to have equal access to company resources and opportunities, based on the principle of equal opportunities and non-discrimination regardless of colour, gender, religion, ethnic origin, political opinion, social origin or national ancestry, disability, gender identity, sexual orientation, social status, age and any other form of diversity contemplated by international law. Eni promotes gender equality and women's empowerment at work, in business practices and in relations with communities in the countries where it operates, integrating a gender perspective in its processes and in all the activities it promotes, from the development of products and services to local development projects, including through the implementation of specific assessments. Eni is also careful to ensure that its communication initiatives, including commercial ones, promote an inclusive vision of the Company itself and reject the use of gender stereotypes. Eni is committed to eliminating cultural, organizational and material obstacles that limit people's freedom of expression and their full development.

### UNIQUENESS

Eni recognises the uniqueness of all its employees and promotes listening to the contribution of each individual with a view to developing an organizational culture that is able to value the distinctive characteristics of each. Eni works with an inclusive approach on the interactions that occur throughout the entire work experience of Eni people according to the needs that emerge from listening and the related processes that impact on our people. Eni promotes the commitment to giving voice to the distinctive aspects present in the various working groups through the recognition and inclusion of the different languages, ways of acting and interacting, skills possessed, preferred operating methods, individual aptitudes, propensities and experiences acquired.

### INCLUSIVENESS

Eni, as a global company, promotes a culture of inclusivity for a participatory work environment based on values of transparency, sustainability and listening, supporting dialogue and the dissemination of an inclusive and collaborative mindset, starting from the strong commitment of management, which, in exercising leadership, is requested to lead by example. Eni is committed to increasing awareness of diversity and management's ability to enhance it with the progressive involvement of its people. Eni supports individual freedom of expression by encouraging active acceptance of the other aiming at a work environment characterized by acceptance and respect of different needs and languages. Eni implements a policy based on transparency that encourages employees to provide feedback to strengthen their sense of belonging in the organization. Eni works to consolidate individual commitment and empowerment of people on the value of inclusion through actions of awareness-raising, communication on D&I issues and the creation of a D&I Community.

Activities at risk related to Diversity and Inclusion issues have been identified by Eni through the internal risk assessment process and are periodically reviewed and updated. At the time of issuance of this ECG Policy, the relevant processes are the communication process and the human resources process.

In particular, in the communication process, the risks are those related to the potential impact that the actions taken by Eni in the area of D&I and their communication could have on internal and/or external stakeholders with a potential negative perception of the corporate image by current/potential employees, customers, counterparties, shareholders, investors or supervisory authorities, and consequent implications on the company's operations and attractiveness as regulated in the relevant regulatory documents.

In the human resources process, the risk is that of discrimination and non-inclusion and, to mitigate those, different actions are envisaged depending on the different subprocesses, as regulated in the relevant regulatory documents.

Eni is committed to promoting and maintaining reporting mechanisms, regulated in the internal regulatory instrument on whistleblowing.

## ■ A.3 ROLES AND RESPONSIBILITIES

The main roles and responsibilities of the subjects involved in the Diversity and Inclusion ECG Policy, in relation to the areas regulated by this document, are as follows:

<p><b>DIRECTOR OF HUMAN CAPITAL &amp; PROCUREMENT COORDINATION</b></p>	<ul style="list-style-type: none"> <li>■ Authorizes the corporate strategy on D&amp;I</li> <li>■ Oversees the sharing of the results of D&amp;I activities with top management</li> </ul>
<p><b>D&amp;I FUNCTION</b></p>	<ul style="list-style-type: none"> <li>■ Coordinates the process of defining and updating the proposed corporate strategy on D&amp;I</li> <li>■ Coordinates the process of drafting the portfolio of D&amp;I initiatives, supports business functions in the identification and implementation of initiatives</li> <li>■ Ensures periodic reporting on D&amp;I on the overall progress of initiatives while also contributing to mandatory and voluntary sustainability reporting</li> </ul>
<p><b>COMPETENT BUSINESS FUNCTIONS</b></p>	<ul style="list-style-type: none"> <li>■ Contribute, each in r their organizational areas of their competence, to the definition of the D&amp;I strategy and the plan of initiatives</li> <li>■ Ensure the implementation of planned initiatives under their responsibility and guarantee the return of information to the D&amp;I Function</li> </ul>
<p><b>SUBSIDIARIES</b></p>	<p>This means subsidiaries as defined in the “Regulatory System” Policy, including listed subsidiaries.</p> <ul style="list-style-type: none"> <li>■ Ensure the implementation of planned initiatives under their responsibility and guarantee the return of information to the D&amp;I Function</li> </ul>



## B. APPLICATION MODALITIES

### ■ B.1 THE D&I FRAMEWORK

This ECG Policy aims to define a framework of reference for implementing the initiatives to be put in place to:

- encourage the freedom of expression and value of all individuals, both inside Eni and directly or indirectly involved in its activities (third parties)
- train personnel and all those directly and indirectly involved in Eni activities on Diversity and Inclusion issues
- promote the dissemination of this ECG Policy through the elimination of any kind of barriers (e.g. language, graphic representations, etc.).

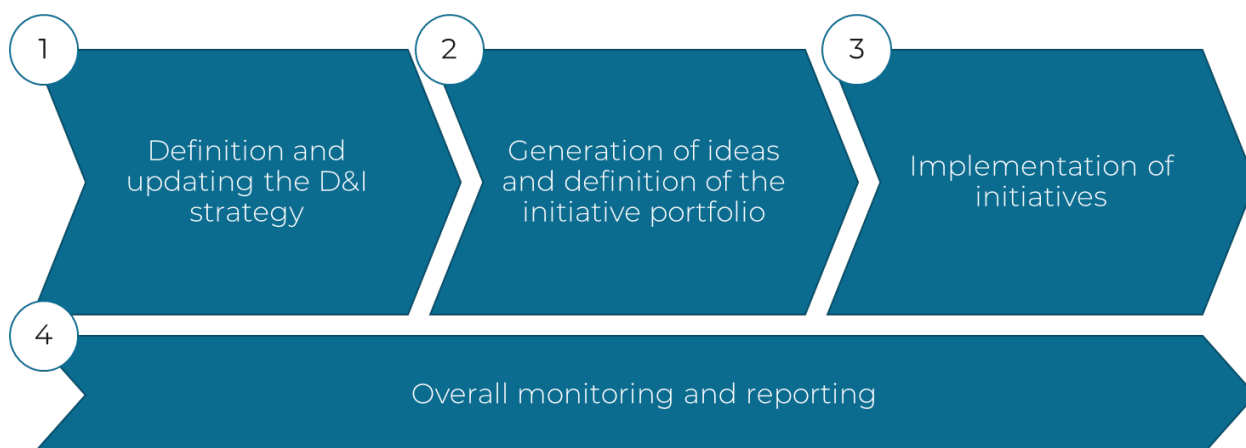
The D&I process was based on two macro-guidelines of action: **inclusive mindset** and **specific targets**, divided into four main intervention areas, to be implemented using a progressive approach, increasing the breadth and depth of the initiatives. The four areas of D&I actions concern:

- *Leadership*: actions aimed at increasing awareness of diversity and management's ability to value it with the progressive involvement of top management
- *Engagement*: actions aimed at consolidating individual commitment and responsibility of people on the value of inclusion
- *Listening*: definition of a system for continuously listening to Eni people and external stakeholders to monitor the effectiveness of the plan of initiatives and guiding future developments of the plan
- *Communication*: definition of an integrated internal and external communication strategy which, with a data-driven approach, is able to enhance the effectiveness of the actions implemented and becomes a tool for engagement of stakeholders

#### B.1.1 The Stages: identification, implementation and monitoring of initiatives

The D&I process can be divided into the following stages:

- 1) Definition and updating of the D&I strategy
- 2) Generation of ideas and definition of the initiatives portfolio
- 3) Implementation of initiatives
- 4) Overall monitoring and reporting



**1) During the *defining and updating the D&I strategy* stage, the D&I Function:**

- Collects the needs that emerged from the **listening initiatives** carried out in the previous year
- Conducts structured meetings with the competent business functions<sup>4</sup> in order to **collect their needs/contributions** with regard to D&I
- Analyses and organizes, in cooperation with the Sustainability function, the **requirements emerging from the various external drivers**, such as international standards – including ones specifically on gender – (e.g. new laws, principles, initiatives), reporting standards and specialist ratings
- Carries out **benchmarking** activities on D&I best practices and comparison with the results of studies carried out by organizations specialized in D&I also in cooperation with other competent business functions
- **Rationalizes** and shares emerging evidence with the competent business functions

On the basis of the results of the activities described above, the D&I Function prepares the proposed D&I strategy which is submitted by the Head of D&I for the authorization of the Director of Human Capital & Procurement Coordination and subsequently sent to the main internal stakeholders, in liaison with the competent business functions, as well as to the Sustainability function, which consolidates the contributions of the functions responsible for the sustainability planning process within the framework of the Four-Year Plan in line with the provisions of the reference regulatory instruments.

Periodically, and following specific listening initiatives, the D&I Function updates the strategy in the same way as that identified for its definition.

Any needs arising during the year, which are not included in Eni's D&I initiative plan, may be assessed later by the D&I Function depending on their urgency/strategy/budget availability.

**2) During the *generation of ideas and definition of the initiatives portfolio* stage, and on the basis of the defined guidelines, the D&I Function:**

<sup>4</sup> For example, Human Resources and Organization, Procurement, Sustainability, Health, Safety and Environment, Personnel Services, Compliance, and Communication functions.

- Involves the competent business functions and any other functions concerned and supports them in identifying initiatives that are consistent with the defined D&I strategy
- Consolidates the overall portfolio of D&I initiatives for the reporting period (objectives, format, actors involved, instruments and timescales)
- Identifies priority areas for intervention
- Finalizes and shares the plan of initiatives and priority areas of intervention with the competent business functions
- Arranges the preparation of the budget/spending plan of the initiatives under the responsibility of D&I, supported by the competent Planning and Control function. The budget for D&I actions developed by the competent functions remains the responsibility of the functions themselves
- Defines benchmark KPIs to measure the results of initiatives

3) During the **implementation of the initiatives stage**, the **competent business functions and subsidiaries**:

- Arrange the design and **implementation of** planned D&I **initiatives** under their responsibility
- Provide periodic information to the D&I Function on progress of the initiatives

#### The D&I Function:

- Plans and implements governance and steering of D&I initiatives (e.g. internal communication, community engagement, D&I sponsorship, international initiatives, etc.) in cooperation with the competent business functions
- Supports the competent business functions in the design and implementation of relevant initiatives
- Plans and implements initiatives under its responsibility
- Promotes the **dissemination of the D&I culture** within Eni through training and communication initiatives and engagement of the D&I community (an open and international corporate space aimed at promoting the main D&I initiatives and moderate (?) discussion among members) with the support of the competent functions (e.g. ECU and Internal Communication)
- Involves Eni Corporate University for the design and the implementation of training programs dedicated to the development of an inclusive culture and request the support of the internal functions responsible for communication for the definition of the internal communication strategy and the implementation of initiatives aimed at raising awareness of Eni people at an international level.

4) In the last stage of **overall monitoring and reporting, the D&I Function**:

- **Monitors** the progress of D&I initiatives, ensures periodic reporting on the progress of initiatives to **top management**, after sharing with the Director of Human Capital & Procurement Coordination.
- Identifies any **corrective actions** for initiatives or management/monitoring methods to be shared with the competent business functions
- Guarantees the collection and transmission of qualitative and quantitative information relevant for mandatory and voluntary sustainability reporting, according to the themes and methods defined by Eni's Administration and Financial Reporting Function (for

mandatory reporting) and by Eni's Sustainability Function (for voluntary reporting), ensuring the data is consistent with other reporting flows under their responsibility, and coordination with the relevant internal reporting timescales.

## **B.1.2 The specific targets of D&I**

Eni undertakes annually to update/verify the consistency and coherence of D&I targets through appropriate internal listening initiatives and external surveys, using the following steps:

1. Analysis of results obtained from previous monitoring, listening initiatives conducted and main market trends and updating of specific targets
2. Identification of the needs and challenges that both new and existing specific targets are facing through the analysis of available collected data
3. Drafting of a targeted communication strategy, which supports the different specific targets in the achievement of inclusion objectives
4. Implementation of D&I programs aimed at satisfying the needs of the specific targets identified
5. Monitoring the progress and results of D&I actions to ensure that they are appropriate for the needs of the specific targets

## ■ B.2 REGULATORY REFERENCES / EXTERNAL REFERENCES

The main regulatory reference documents are:

- Articles of Association of Eni SpA
- International Labour Organization Convention No. 190 on the elimination of violence and harassment in the workplace and No. 156 on the equal opportunities and equal treatment of workers: Workers with Family Responsibilities
- UN Convention on the Rights of Persons with Disabilities, Article 27, 2006
- UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) of 1979
- GRI Standards (Global Reporting Initiatives) No. 405
- Gender dimensions of the Guiding Principles on Business and Human Rights
- Charter of Fundamental Rights of the European Union, Articles 15, 22, 23, 26, 31
- EU Corporate Sustainability Due Diligence Directive
- UN Global Compact and UN Women, Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template)
- UN Global Compact – 10 principles
- 2030 Agenda: Goal 4 (Quality education for young people and adults); Goal 5 (Achieving gender equality); Goal 8 (Right to decent work); Goal 10 (Reducing income inequality within and among countries)
- ISO 30415:2021, Human Resources Management – Diversity and Inclusion
- National regulations (Law 68/1999, amended 2015 – 'Entry and integration of persons with disabilities in the world of work'; Bill no. 2418 of 13 October 2021, Equal Pay Act)
- Reference Practice UNI/PdR 125/2022
- Italian Corporate Governance Code
- Directive 2013/34/EU of the European Parliament

## ■ B.3 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

### DEFINITIONS

**D&I:** a set of programs, techniques and strategies aimed at recognizing and enhancing individual differences in order to maximize the potential of all employees, no one excluded.

**DISABILITY:** the meaning of disability applied by Eni includes all forms of physical, cognitive and sensory frailty, including temporary and hidden frailty.

**HUMAN RIGHTS:** the inalienable rights of every person by virtue of belonging to humanity. These rights are based on the recognition of the dignity, freedom and equality inherent in all human beings.

**GENDER:** set of socially constructed roles, behaviours, activities and attributes that a given society considers appropriate for persons belonging to a given gender. Gender is to be distinguished from “sex”, which is understood as the sex assigned at birth, i.e. the set of physical and biological characteristics that distinguish females, males and intersex persons.

**ETHNICITY:** human grouping based on community or strong affinity of physical-somatic, cultural, linguistic and socio-historical characteristics.

**ILO:** International Labour Organization

**SEXUAL ORIENTATION:** a person’s emotional, romantic and/or sexual attraction to individuals of the opposite sex, the same sex or both sexes. It differs from biological sex, gender identity and gender role, which define, respectively, a person’s genetic sex as determined by sex chromosomes, the gender to which someone feels they belong, and the social norms on the behaviour of men and women relating to a given culture and era.

**SOCIAL STATUS:** position of an individual, group or category of persons in a society and the degree of power, wealth and prestige associated with that position. Status can be ascribed – i.e. possessed at birth and thus linked to characteristics independent of the individual’s will or actions (age, family of origin, ethnic group and so on) – or acquired – i.e. obtained through personal efforts and abilities.

**DISCRIMINATION:** behaviour (act or omission) that causes unequal treatment of a person or group of persons, by virtue of their membership of a particular social group or of characteristics or attributes specific to the individual.

**EQUAL OPPORTUNITIES:** the need for legal and social equality between men and women in order to enhance their gender difference and establish a fair gender ratio.

**EQUITY:** a process to ensure that processes and programs within the organization are impartial and provide equal outcomes for every individual.

**STAKEHOLDERS:** persons or groups who have a direct or indirect influence on and/or are influenced by the activities of an organization, its products or services and related performance results.

**WHISTLEBLOWING:** spontaneous reporting by an individual, called a “whistleblower”, of an offence or irregularity committed within the entity, which that individual witnessed in the course of their duties. The whistleblower is often an employee, but can also be a third party such as a supplier or customer.

**THIRD PARTIES:** any person or entity who collaborates or works on behalf of or in the interest of Eni, such as customers, suppliers, contract-workers, commercial partners and industrial partners.

With reference to the responsibility for updates to this document, document filing, storage and traceability of information and data, please refer to the standard paragraphs in the Regulatory System Policy.