

ECG Policy

Consumer Protection & Green Claims

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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 Eni's commitment

The Code of Ethics states that one of the values that inspires **Eni** is to manage relations with customers and **Consumers** in a transparent manner and with professional fairness. Eni therefore undertakes to carry out its commercial initiatives and to promote the company and its products and services in compliance with the regulations that protect the interests of consumers, ensuring that they have complete and transparent information on the products and services provided.

Furthermore, **Eni's** strategy is strongly oriented towards achieving the energy transition objectives for a carbon-neutral future and is inspired by the United Nations Sustainable Development Goals (SDGs). Proper communication to all stakeholders of the Company's strategic positioning, performance and achievements against these objectives is fundamental to building the trust of **Consumers**, investors and other interested parties, who are increasingly attentive to the ethics and environmental impact of the companies they deal with. Defining guidelines for environmental and social sustainability claims helps to set clear objectives, measure progress, and direct efforts and investments towards solutions aimed at achieving the stated objectives.

Correct, complete, transparent and verifiable environmental and sustainability communication is therefore essential in order not to expose the Company - in addition to sanction profiles - to reputational risks related to challenges of **Greenwashing**.

This ECG Policy – Consumer Protection and Green Claims constitutes, together with the other company regulatory instruments, the foundation of the **Consumer Protection & Green Claims Compliance Program** ("**Compliance Program**") aimed at:

- ensuring compliance with the rules and principles on **Consumer** protection and proper **Green** and **Sustainability Claims**, reinforcing awareness of the impact that actions, behaviours and omissions that violate the **Consumer Protection Regulations** may have on **Eni**;
- defining the roles and responsibilities, information flows and tools necessary to support Line Managers in **Preventive Analysis** of **Activities At Risk**, thus helping to create an operating environment that is aware of the impact of its activities and is equipped with tools to prevent the risk of violating, albeit 'unknowingly', the **Consumer Protection Regulations**;
- spreading a compliance culture on **Consumer** protection, contributing to promoting the identification and reporting by Eni People of any actions/conduct that may constitute a violation of the Consumer Protection Regulations, in line with the relevant company regulatory instruments.

A.1.2 Consumer Protection & Green Claims Compliance Program



LEADERSHIP AND GOVERNANCE

The **Compliance Program** is part of the compliance culture and envisages active and maximum commitment by management and all **Eni People**, according to the defined roles and responsibilities. More specifically:

- The Board of Directors of Eni S.p.A. approves the Fundamental Guidelines of this ECG Policy - Consumer Protection & Green Claims.
- The **Head of the Compliance Program**, identified in the Process Owner of the Policy, reports directly to the top management and ensures a regular information flow to the corporate governance on the development of **Consumer** protection risks and the adequacy of the **Compliance Program**. With the support of the **Consumer Protection Compliance Unit**, it promotes the spreading of the culture of compliance within **Eni** towards all **Eni People**, through the identification of specific communication and training initiatives that increase awareness of risks exposure and the ability to manage them. In addition, it identifies, to the extent of its competence, initiatives to update the current management systems for the main corporate risks.
- The Line Managers, identified as those reporting directly to the Chief Executive Officer or Chief Operating Officers for Eni S.p.A./Chief Executive Officer (or equivalent figure) for the Subsidiaries, are responsible for contributing to the implementation of the management and control system of the **Consumer Protection Compliance Risk**.



RISK ASSESSMENT

The Compliance Program takes into account the context of the organization, has a clearly defined scope of application and accurately identifies the risks and related controls according to a specific risk assessment process. Risk assessment allows a risk-based prioritisation of interventions, based on the predefined risk assessment methodology and metrics (risk-based approach).



INTERNAL RULES

Key elements of the **Compliance Program** are the rules contained in the internal regulatory instruments, including this ECG Policy – Consumer Protection and Green Claims, which all **Eni People** must comply with.



SPECIALIST COMPLIANCE UNIT

Eni has equipped itself with a dedicated internal structure (**Consumer Protection Compliance Unit**), composed of qualified professionals specialised in consumer protection & **Green Claims**, which provides specialised assistance to support Line Managers in identifying, assessing and managing the risk of violation of **Consumer Protection Regulations**.



MONITORING AND AUDIT ACTIVITIES

The **Compliance Program** is subject to monitoring and audit activities by the competent business functions in order to periodically assess its effectiveness.



TRAINING

To ensure comprehensive implementation of the **Compliance Program** across the Group, the **Eni People** are trained on the compliance issues and risks associated with the **Consumer Protection Regulations** and participate, on a regular basis, in specific training activities tailored to the function and their degree of exposure.



REPORTING

The **Head of the Compliance Program**, also on the basis of the results of the monitoring and auditing activities, ensures a regular and adequate information flow on the adequacy of the **Compliance Program** to the corporate governance bodies also providing, where necessary, information on extraordinary events that require *ad hoc* reporting.



CONTINUOUS IMPROVEMENT

The **Head of the Compliance Program**, through the **Consumer Protection Compliance Unit**, continuously monitors the adequacy of the **Compliance Program**, drawing inspiration from market best practices, in order to ensure continuous improvement in time of its compliance model.

The Fundamental Guidelines of the present ECG Policy were approved by the Board of Directors of Eni SpA on 16 November 2023.

A.1.3 Area of application and transposition modalities

This ECG Policy – Consumer Protection & Green Claims is for immediate application by Eni SpA and applies to the **Subsidiaries**¹, subject to transposition in the manner described in the **‘Regulatory System’ Policy**.

In particular:

- unlisted subsidiaries and their subsidiaries ensure transposition without possible waiver² promptly and in any case no later than 30 April 2024;
- Subsidiaries with listed shares (hereinafter ‘Listed Subsidiaries’) and their subsidiaries receive this document and transpose the Fundamental Guidelines, without possible waiver³. In addition, they transpose the Application Modalities, with the possibility of adapting them as a result of specific regulatory constraints and the need to adapt them to the company’s roles and responsibilities, after informing the **Process Owner**.

This ECG Policy – Consumer Protection & Green Claims supersedes the following Eni SpA documents:

- ‘Code of Commercial Practices and Advertising’ MSG issued on 6 May 2017;
- Annex A ‘Obligations on contracts executed via telesales, prize promotions/contests and unfair contract terms’ to the ‘Code of Commercial Practices and Advertising’ MSG issued on 11 October 2017.

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**.

■ A.2 REFERENCE PRINCIPLES AND ACTIVITIES AT RISK

The activities governed by this ECG Policy – Consumer Protection & Green Claims are carried out in compliance with the **Code of Ethics**, the other ECG Policies, the general transparency standards and the 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

¹ As defined in the **“Regulatory System Policy**.

² 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.

³ 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.

principles listed below (applicable to Eni SpA and its Subsidiaries, as **'Trader(s)'** under the Consumer Code):

<p>TRANSPARENCY, COMPLETENESS AND NON-MISLEADING NATURE OF CONTRACTUAL INFORMATION AND COMMERCIAL COMMUNICATIONS</p>	<p>practices in their field.</p> <p>FAIR TREATMENT AND PROHIBITION ON DISCRIMINATION BETWEEN CONSUMERS</p>
<p>Consumers may be influenced by cognitive biases in their commercial choices. For this reason, the Trader's communications likely to influence Consumers' choices must be transparent, complete and not misleading in order to enable Consumers to make (or not make) an informed commercial choice.</p>	<p>The Trader must treat their customers fairly and not discriminate against them. Moreover, the Trader may not treat Consumers differently on the basis of the European Union Member State they belong to or, in general, their place of residence or nationality, unless this is justified by regulatory requirements.</p>
<p>ACCURACY, TRUTHFULNESS, UNAMBIGUITY AND DEMONSTRABILITY OF GREEN AND SUSTAINABILITY CLAIMS</p>	<p>MARKETING OF PRODUCTS AND SERVICES AND MANAGEMENT OF PROCESSES ACCORDING TO QUALITY AND EFFICIENCY STANDARDS</p>
<p>To not be misleading, Green Claims and Sustainability Claims must be truthful and must be presented in a clear, specific, unambiguous and accurate manner. The Trader must have evidence to support their statements and be prepared to provide it to the relevant authorities in a comprehensible manner if the claim is challenged.</p>	<p>In their commercial offer, the Trader aspires to the highest standards of quality and efficiency, including through the application of codes of conduct, where they exist.</p>
<p>DILIGENCE AND PROFESSIONALISM, GOOD FAITH, FAIRNESS AND HONESTY OF BUSINESS PRACTICES</p>	<p>MARKET PROTECTION AND CONSUMER EXPECTATIONS</p>
<p>The Trader is required to operate on the market according to principles of fairness and honesty and to act towards Consumers in compliance with their obligations of good faith and in accordance with professional standards and best</p>	<p>The Trader's commercial conduct may not jeopardize the proper functioning of the market and must be guided by the safeguarding of the Consumer's legitimate expectations.</p>

For the purposes of this ECG Policy - Consumer Protection & Green Claims constitute **Activities at Risk**:

Activity 1 [Green Claims and Sustainability Claims]

Communications containing a **Green Claim** or a **Sustainability Claim**, in whatever form they are made (textual, graphic or symbolic) and conveyed through any medium or channel (media, social, press releases, institutional website, official reports), as well as product labels, trademarks, company or product names.

Activity 2 [Other types of communication]

Representations or content conveyed in the context of an institutional or commercial communication – other than the activities under the previous paragraph – on any physical or

digital channel intended, directly or indirectly, to solicit the purchase of goods or products or to promote the company image (including advertising campaigns, marketing and commercial emails, press releases, brochures, content on company websites).

Communications made by partners and third parties (e.g. agents, intermediaries, retailers) with whom **Eni** has business relations and who use the logo, brand or name of **Eni** or of its products/services may also fall within the **Activities at Risk** referred to in paragraphs 1 and 2 above.

Activity 3 [Sale of products and/or services]

Any activity aimed at selling or supplying, including at a distance or in any case outside business premises, **Eni** products or services to **Consumers** and/or **Micro-Enterprises**, as well as any activity aimed at preparing, concluding, signing and/or modifying contracts entered into with **Consumer** and/or **Micro-Enterprises**.

This **Activity at Risk** also includes activities carried out by third parties appointed by **Eni** companies (e.g. agents, intermediaries, retailers) as well as pre- and post-sales customer service activities and the management of any complaints and reports.

Activity 4 [Partnership/sponsorship agreements]

Partnership and sponsorship agreements - including contractual relationships and any other type of agreement or commercial arrangement, entered into with third parties - which have as their object or as a consequence activities that may affect, even indirectly, **Consumers** and/or **Micro-Enterprises** (e.g. co-branding, etc.).

Activity 5 [Prize contests and promotions]

Prize competitions events aimed at promoting, through the promise of prizes, the sale or awareness of products, services or brands, as governed, in Italy, by Italian Decree of the President of the Republic 430/2001 and subsequent amendments and additions.

A.3 ROLES AND RESPONSIBILITIES

The main roles and responsibilities of the subjects involved in the ECG Policy - Consumer Protection & Green Claims, in relation to the areas regulated by this document, are as follows:

<p>HEAD OF THE COMPLIANCE PROGRAM</p>	<ul style="list-style-type: none"> ■ It is responsible for the adequacy of the design of the processes and related company regulatory instruments concerning the obligations under the Consumer Protection Regulations. ■ It coincides with the Process Owner, identified in accordance with the "Regulatory System" Policy.
<p>CONSUMER PROTECTION COMPLIANCE UNIT</p>	<p>It is the organizational unit, established within the COMP function, responsible of the following activities in the field of Consumer protection:</p> <p><u>Design activities and training Program:</u></p> <ul style="list-style-type: none"> ■ contribute to the definition of the compulsory training Program, according to a risk-based approach , in cooperation with the COMP function responsible for training related to compliance models; ■ periodically review the Compliance Program, also on the basis of the results of risk assessment, monitoring and audits and of reference best practices, and make proposals for improvement; ■ draw up, in the cases provided for in this ECG Policy, specific guidelines on certain Activities at Risk or Business Initiatives. <p><u>Assistance and training activities⁴</u></p> <ul style="list-style-type: none"> ■ monitor regulatory developments; ■ provide specialised assistance to Line Managers and subsidiaries in identifying, assessing and managing the risk of violations of the Consumer Protection Regulations; ■ ensure and promote internal communication and training activities, in line with the mandatory training Program, as defined above; ■ ensuring the actions necessary to guarantee the representation and protection of Eni's interests in investigations and proceedings before the Control Authorities.
<p>LINE MANAGERS</p>	<ul style="list-style-type: none"> ■ They report directly to the Chief Executive Officer or Chief Operating Officer for Eni S.p.A./ Chief Executive Officer (or equivalent figure) for Subsidiaries and are responsible, as risk owners, also through their own structures, for carrying out the Preventive Analysis of Business Initiatives, with the possible

⁴ In Subsidiaries, including listed companies, the assistance and training activities are carried out by the consumer protection unit of the subsidiary, also for its own subsidiaries. The Consumer Protection Unit of the Subsidiary ensures, also for its own subsidiaries, timely information flows to the **Consumer Protection Compliance Unit** on the initiation and status of investigations and proceedings, investigations or requests for information by the **Control Authorities** and, in any case, on assistance activities pertaining to strategic issues, of transversal impact or which may present significant and/or critical aspects for **Eni**, or on points of attention and/or areas for improvement, including potential ones, relating to the internal control and compliance risk management system.

	<p>specialist support of the Consumer Protection Compliance Unit⁵ - where applicable - and, more generally, to contribute to the implementation of the Consumer Protection Compliance Risk management and control system.</p>
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⁵ In Subsidiaries, including listed companies, where it is present, it is the consumer protection unit of the Subsidiary, also for its own subsidiaries.

B. APPLICATION MODALITIES

■ B.1 THE CONSUMER PROTECTION & GREEN CLAIMS FRAMEWORK / RULES

Eni adopts a risk-based approach, providing for **Consumer Protection Compliance Risk** mitigation actions proportionate to the risk level in terms of impact and probability of occurrence associated with the **Activity at Risk** being monitored. Specifically, the actions provided for by Eni to manage **Consumer Protection Compliance Risk** are as follows:

1. *Prior analysis of Activities at Risk*

The Line Managers, also through their own structures, carry out the **Prior Analysis**, contributing to an effective compliance system, with the support of the **Consumer Protection Compliance Unit**⁶, where provided for in paragraph 1.1.

In cases where prior involvement of the **Consumer Protection Compliance Unit** is envisaged, the Line Managers must contact the **Consumer Protection Compliance Unit** well in advance and provide all the information useful to identify and assess any risks deriving from the **Business Initiative** under examination, as well as any further information useful to identify any corrective and/or mitigation actions.

Having analysed the **Business Initiatives** submitted to it, the **Consumer Protection Compliance Unit** provides feedback containing a summary of the analysis carried out and the conclusions it has reached, indicating, when appropriate, the possible corrective actions to remove and/or mitigate any risks.

1.1 *Engagement modalities*

Activity at Risk	Inherent risk	Consumer Protection Compliance Unit Involvement Quote	Notes
Green Claim/Sustainability Claim	High	Yes, always.	
Other types of communications (other than Green Claims or Sustainability Claims)	Medium-high	Yes, in the case of new Business Initiatives .	
Sale of products and/or services	High	Yes, always.	

⁶ In Subsidiaries, including listed companies, where it is present, it is the consumer protection unit of the Subsidiary, also for its own subsidiaries.

Partnership/sponsorship agreements	Low	No.	Paragraph 1.2 describes the approach, operating methods and exceptions.
Prize contests and promotions	Medium-high	Yes, always in the case of prize contests and for retail prize promotions. Only in the events of doubts (e.g. framing of Business Initiatives), in other cases.	

1.2 Partnership/sponsorship agreements

So-called “business-to-business” agreements and contractual relationships do not require the involvement of the **Consumer Protection Compliance Unit**. If, however, such agreements have, directly or indirectly, an impact on **Consumers** or **Micro-Enterprises**, contractual safeguards must be employed to mitigate any risks for Eni attributable to the counterparty’s conduct. In particular, standard indemnity and limitation of liability clauses and the counterparty’s obligation to submit communication materials bearing the Company’s brand, logo or name to **Eni** for prior written approval must be incorporated in the contractual provisions.

Notwithstanding the above, the prior and timely involvement of the **Consumer Protection Compliance Unit**⁷ is, instead, always required:

- in the case of agreements and contractual relationships entered into with **Micro-enterprises**;
- in the case of contractual or commercial documentation containing data or information that could constitute a **Green Claim** or **Sustainability Claim**, which can be used by the contractual counterparty as an assertion or to fulfil other obligations;
- in the case of business contracts (e.g. for the distribution of products and services) from which the risk of liability for **Eni** may arise, due to *culpa in vigilando*, attributable to unfair business practices or misleading advertising carried out by the commercial partner. This occurs, for example, when the use of **Eni**’s brand, logo or name may give rise to the mistaken belief, on the part of the **consumer**, that **Eni** is the consumer’s counterparty in the commercial relationship.

2. Training

⁷ In Subsidiaries, including listed companies, where it is present, it is the consumer protection unit of the Subsidiary, also for its own subsidiaries.

In order to ensure the spread, within the company, of a **Consumer** protection culture and to provide the appropriate tools to ensure compliance with **Consumer Protection Regulations** – and, consequently, mitigate the **Consumer Protection Compliance Risk** – the **COMP** function providing training linked with compliance models, in cooperation with the **Consumer Protection Unit**, defines the mandatory training Programs, according to the risk-based approach.⁸ Contents, methods and frequency of training are therefore calibrated to the level of exposure of **Eni People**, according to the activities performed, the professional family they belong to or the Business Areas in which they work, and developed with the support of the Human Resources functions and the relevant **Eni** training centre. Training activities are recorded and participation is tracked. If the activities or the related risk require so, Eni arranges appropriate training activities in the local language and with third parties (e.g. agents, intermediaries, retailers) where their actions may constitute a **Consumer Protection Compliance Risk**.

3. Guidelines

In cases where the **Consumer Protection Compliance Unit** finds that certain **Activities at Risk** or certain **Business Initiatives** present a particularly high risk and/or may occur repeatedly, it may adopt and disseminate specific guidelines, aimed at raising and increasing the awareness of **Eni People** about the **Consumer Protection Compliance Risk** in relation to these specific cases.

4. Knowledge sharing

The **Consumer Protection Compliance Unit** constantly monitors the regulatory context, case law and market best practices in order to promptly identify any areas requiring attention and showing critical issues and, if necessary, to increase control measures against **Consumer Protection Compliance Risk**. In order to promptly inform the Business Areas affected by any case law or regulatory developments and increase the degree of awareness about **Consumer Protection Compliance Risk** issues, the **Consumer Protection Compliance Unit** drafts specialist newsletters or newsflashes to share the most relevant news.

5. Monitoring and controls

Monitoring activities and controls aimed at detecting and analysing the trend in **Consumer Protection Compliance Risk** are carried out by the competent business functions on the basis of the provisions of the relevant regulatory instruments.

6. Reporting

The activities performed within the framework of the **Compliance Program** contribute as input to the reporting process of the **COMP** function, in line with the methodologies, timescales and information flows defined by the Integrated Compliance Process, with the ultimate goal of enabling preventive, corrective and remedial action to be taken in an appropriate and timely manner, where necessary.

⁸The consumer protection unit of the Subsidiary, also cooperates in the definition of compulsory training programs for the Subsidiaries, including listed companies provided with it. Training activities on strategic issues, with a strong cross impact or which may have particularly significant and critical aspects for Eni, are in any case defined by the **Eni Consumer Protection Compliance Unit**, also with the involvement of the Subsidiary's consumer protection unit.

7. Relations with the Control Authorities

Eni bases its actions on full and constructive cooperation with the **Control Authorities**. Communications and interlocutions with the **Control Authorities** take place with the involvement of the **Consumer Protection Compliance Unit**⁹.

Requests for information and other contacts In the event of a request for information or contact, including on an informal basis, by a **Control Authority**, the Line Managers will inform the **Consumer Protection Compliance Unit** immediately and provide indications as to the necessity or, in any case, the advisability of providing feedback to the relevant requests.

Inspections. In the event of investigations by one or more **Control Authorities**, also through other law enforcement agencies, conducted at the premises of an **Eni** company and/or the domicile of one of the **Eni People**, in addition to the provisions of **Eni** regulations concerning access by the **Control Authorities**, the Line Managers must immediately inform the **Consumer Protection Compliance Unit**.

Preliminary investigations. If they become aware of the initiation of an investigation or other enquiry by a **Control Authority** against **Eni** in any way, the Line Managers shall immediately inform the **Consumer Protection Compliance Unit** so that it can define all the appropriate initiatives to be taken.

⁹ In Subsidiaries, including listed companies, where it is present, it is the consumer protection unit of the Subsidiary, also for its own subsidiaries.

■ B.2 EXTERNAL REGULATORY REFERENCES

Consumer Protection:

European Union:

- *Directive 93/13/EEC on unfair terms in consumer contracts entered into with consumers;*
- *Directive 98/6/EC on consumer price indications;*
- *Directive 2005/29/EC concerning unfair commercial practices;*
- *Regulation (EU) 2013/524 on online dispute resolution;*
- *Regulation (EU) 2018/302 'geo-blocking' and discrimination on grounds of nationality and residence;*
- *Directive (EU) 2019/771 on certain aspects of sales contracts;*
- *Directive (EU) 2019/770 on certain aspects of contracts for the supply of digital content and digital services;*
- *Directive (EU) 2019/2161 for better enforcement and modernisation of EU consumer protection rules;*
- *Directive (UE) 2020/1828 on representative actions for the protection of consumers;*
- *ISO 37301:2021 for the certification of compliance management systems;*
- *Case law of the European Control Authorities and Commission decisions.*

Italy:

- *Italian Decree of the President of the Republic 430/2001 on prize promotions;*
- *Italian Legislative Decree 70/2003 on e-commerce;*
- *Italian Legislative Decree 206/2005 'Consumer Code';*
- *Italian Legislative Decree 145/2007 on misleading and comparative advertising;*
- *Case law of the Italian Control Authorities.*

Green Claims and Sustainability Claims:

European Union:

- *Directive 2005/29/EC concerning unfair commercial practices;*
- *Directive 2006/114/EC concerning misleading and comparative advertising;*
- *Directive (EU) 2019/2161 for better enforcement and modernisation of EU consumer protection rules;*

- *European Commission Guidelines on the application of Directive 2005/29/EC on unfair commercial practices of 29 December 2021;*
- *European Commission's proposal for a Directive 'Empowering Consumers for the Green Transition' of 30 March 2022;*
- *European Commission's proposal for a Directive of 22 March 2023, so-called "Substantiating Green Claims";*
- *Case law of the European Control Authorities and Commission decisions.*

Italy:

- *Italian Legislative Decree 206/2005 'Consumer Code';*
- *Italian Legislative Decree 145/2007 on misleading and comparative advertising;*
- *ISO 37301:2021 for the certification of compliance management systems;*
- *Case law of the Italian Control Authorities.*

■ B.3 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

DEFINITIONS

ACTIVITIES AT RISK: activities that present a risk – or potential risk – of violation of the Consumer Protection Regulations, as identified following the outcome of the risk assessment analyses, carried out by the competent Eni functions.

BUSINESS INITIATIVES: any business activity having even only potential relevance under the Consumer Protection Regulations (e.g. institutional and commercial communications, including those containing green and sustainability claims, customer contracts, prize competitions, etc.).

CODE OF ETHICS: the Eni Code of Ethics.

COMP: Integrated Compliance Department of Eni SpA responsible for overseeing the development of the integrated compliance model aimed at improving the effectiveness of compliance action in Eni through the adoption of a risk-based approach to optimise controls and enhance operational synergies in the processes and controls present in the various models, as well as the development and dissemination of a corporate culture based on ethical values and integrity. The Integrated Compliance Department has direct access to corporate governance bodies through regular reporting, is endowed with autonomy in the performance of its functions and an appropriate level of authority, expertise and resources.

CONSUMER: the individual acting for purposes unrelated to any entrepreneurial, commercial, craft or professional activity.

CONSUMER PROTECTION & GREEN CLAIMS COMPLIANCE PROGRAM (or COMPLIANCE PROGRAM): the set of rules contained in this ECG Policy – Consumer Protection & Green Claims and in the other corporate regulatory instruments, aimed at guaranteeing, through the implementation of the behaviours and activities envisaged therein, compliance with the Consumer Protection Regulations.

CONSUMER PROTECTION COMPLIANCE RISK: the risk, arising from violations of the Consumer Protection Regulations, of incurring into: (i) administrative fines of up to €10 million in the case of domestic conduct and up to 4% of the turnover of the company concerned (in the case of conduct impacting Consumers of three or more EU Member States); (ii) obligations to cease or desist commercial practices or communication materials; (iii) obligations to compensate damages caused to customers and Consumers; and (iv) reputational damages.

CONSUMER PROTECTION REGULATIONS: the set of European and national or otherwise applicable regulations, including guidelines and other second-degree sources or soft law, case law and guidelines of Control Authorities concerning consumer protection, environmental and sustainability communication, commercial communications and advertising.

CONTROL AUTHORITY: any National or supranational authority, in Italy or abroad, that is competent for/has jurisdiction over issues related to the Consumer Protection Regulations.

ENI: Eni S.p.A. and, unless otherwise specified, its direct and indirect Subsidiaries in Italy and abroad.

ENI PEOPLE: members of Eni's management and corporate bodies and employees.

GREEN CLAIM: any content or representation, conveyed in the context of institutional or commercial communication that states or implies that a product, process or company has a positive, zero or otherwise less harmful impact on the environment – also compared to other products or companies.

GREENWASHING: communication or marketing strategy pursued by companies, institutions or entities that present their activities as environmentally sustainable, attempting to conceal their negative environmental impact.

MICRO-ENTERPRISES: entities, companies or associations, regardless of the legal form, which are engaged in economic activities, employ less than ten people and generate an annual turnover that does not exceed €2 million.

PRIOR ANALYSIS: the assessment of whether Business Initiatives comply with the Consumer Protection Regulations, to be carried out taking into account the specific circumstances of the case and the Consumer Protection Regulations.

'REGULATORY SYSTEM' POLICY: the Policy regulating the regulatory system, i.e. the set of instruments that define for Eni SpA and its Subsidiaries the reference models for ethical, compliance and corporate governance issues, as well as the corporate processes and related operating methods.

SUSTAINABILITY CLAIM: any message used to distinguish and promote a product, process, business or service with reference to social responsibility and sustainability issues.

TRADER: any natural or legal person acting in the course of his trade, business, craft or profession and anyone acting in the name of or on behalf of the trader.