

ECG Policy

Zero Tolerance against violence and harassment in the workplace

9 November 2023
policy ecg-zet-eni spa_en_r01



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A. FUNDAMENTAL GUIDELINES

■ A.1 INTRODUCTION

A.1.1 Eni's commitment

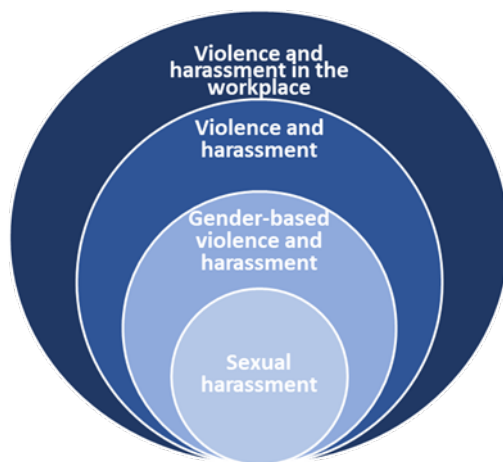
In this Ethics, Compliance and Governance Policy (hereinafter "ECG Policy") Eni defines, in accordance with the provisions of the Code of Ethics, the general and fundamental reference principles and the conducts that should be prohibited in order to ensure a work environment free of violence and harassment of any form or kind.

Among other things, the Policy provides guidance in accordance with the regulatory requirement contained in Law no. 4 of 15 January 2021, which ratifies and implements the International Labour Organization Convention no. 190 (hereinafter "Convention 190") on the Elimination of Violence and Harassment in the Workplace.

Any conduct of violence and harassment in the workplace shall not be tolerated as it is in contrast with Eni's values and commitment; therefore, all Eni employees and members of Eni's corporate administration and control bodies must be committed to complying with the Policy.

Eni will therefore sanction through disciplinary action any conduct in violation of the principles established in the present ECG Policy, which are attributable to Eni people and/or Third Parties and which may emerge as a result of internal verification activities or reports.

The following diagram provides a perimeter of the prohibited conducts pursuant to the present ECG Policy¹.



¹ The same conduct may also constitute a Security Event.

VIOLENCE AND HARASSMENT IN THE WORKPLACE

The scope of application of the present ECG Policy includes violence and harassment at work, identified with: violence and harassment that occurs against Protected Persons on the occasion of, in connection with or arising out of work.

Therefore, workplace violence and harassment should be interpreted as violence and harassment which, for example, occurs:

- in the workplace, including public and private spaces which are turned into workplaces or work-related places²;
- in break-rooms or lunch breaks' rooms, or sanitary facilities, or changing rooms;
- during work-related travel or business trips, training, events or activities, including social ones³;
- as a result of or during business communications, including those made possible by information and communication technologies⁴;
- in accommodation provided by employers;
- while commuting to and from the workplace.

VIOLENCE AND HARASSMENT

Violence and harassment are defined as all conducts - performed in physical, verbal or non-verbal form - or all threats of any such conducts, whether on a one-off basis or carried out on multiple occasions, that is meant to cause, causes or is likely to result in physical, psychological or economic harm.

Violence and harassment examples include, but are not limited to:

- Verbal or visual expressions that are abusive, insulting or in any case characterised by unwanted intimacy that is not in line with the nature of the connection with the interlocutor.
- Verbal or visual expressions that are denigrating and offensive or in any case point at elements which identify the individual as such (ethnicity, nationality, religion, political affiliation, mental health and physical diversity, health condition, age and any other personal data).
- acts of bullying, mobbing, or behaviours causing a constant and permanent negative impact on the individual's perception of the work environment, capable of affecting the right to health (so-called "straining"), or any other form of manipulation or psychological abuse.
- acts which contribute to creating a relationship of trust and emotional connection through which an individual manipulates, exploits or abuses another person (so-called "grooming").
- Physical violence or the threat of physical violence.
- Digital/online harassment/stalking.
- Gender-based violence and harassment (as defined below).

GENDER-BASED VIOLENCE AND HARASSMENT

"Gender-based violence and harassment" refers to violence and harassment (as defined above) carried out against people because of their sex or gender, whether towards the individual or the whole group as such, including sexual harassment. Gender-based violence and harassment include, but are not limited to:

² Such are, for example, those arising from contacts with local communities.

³ This includes those arising from job interviews/recruitment activities as well as social activities outside the workplace or, for example, during an Eni lecture at a university event or course.

⁴ This includes exchanges of communication outside working hours.

- Violence perpetrated, in physical and/or psychological form, against a person on the grounds of their gender, gender identity or sexual orientation⁵, including violence against women and LGBTQIA+ persons⁶, and acts of persecution, so-called “stalking.”
- The dissemination and the threat to disseminate intimate images.
- Sexual harassment (as defined below) and sexual assault, whether attempted or committed.

SEXUAL HARASSMENT

Sexual harassment is a subset of gender harassment and includes any conduct of a sexual nature - expressed in physical, verbal or non-verbal form - or the threat of such a conduct, whether on a one-off basis or carried out on multiple occasions, which is intended to cause, causes or can be perceived as a violation of the dignity of the Harassed Person or as a trigger to creating an intimidating, hostile, degrading, humiliating or offensive environment.

When sexual harassment is carried out by a superior or an individual who can in any case influence the employment relationship and when this also includes implicit or explicit threats or blackmail such acts qualify as an aggravating circumstance (so-called "quid pro quo harassment").

Examples of sexual harassment include, but are not limited to, acts of:

- Staring in a sexually evocative manner or making inappropriate sexual gestures.
- Using anecdotes, jokes or stories of a sexual or lascivious nature that make the other party feel uncomfortable.
- Expressing comments concerning sexuality or physical attraction, or making sexual comments about appearance, clothing, or body parts.
- Making denigratory or degrading comments about a person's sexual orientation or gender identity, or employing insults with a gender/sexual connotation.
- Repeatedly contacting a person (e.g., persistent phone calls or messaging) or repeatedly asking them for a date.
- Making unwanted sexual advances.
- Send sexually evocative communications in any format, or share or display sexually inappropriate images or videos in any format.
- Unwanted touching, including deliberately pinching, stroking, rubbing or brushing against another person
- Promising benefits of any kind - personal or business - in exchange for sexual favours.
- Threatening retaliation or negative consequences of any kind - personal or business - if sexual favours are not granted.

The Fundamental Guidelines of the present ECG Policy were approved by the Board of Directors of Eni SpA on 14th September 2023.

⁵ "Gender" refers to the set of socially constructed roles, behaviours, activities, and attributes that a given society considers appropriate for people of a particular gender. "Gender" is not synonymous with "sex", intended as sex assigned at birth, i.e. the set of physical and biological characteristics that distinguish females, males and intersex people. In fact, the gender identity of a given person (to be interpreted as the subjective experience of perceiving oneself as belonging to a certain gender) does not necessarily match the sex assigned at birth: when that is the case, the definition of trans/transgender people applies. "Sexual orientation" entails the physical, romantic, and/or emotional attraction that a person feels towards other individuals, including but not limited to: homosexuality, heterosexuality, and bisexuality.

⁶ LGBTQIA+ is the acronym for lesbian, gay, bisexual, transgender, queer, intersex, asexual, respectively. The "+" is an inclusive symbol, which encloses all sexual orientations and gender identities that are not hetero-conforming

A.1.2 Area of application and transposition modalities

The present ECG Policy is of immediate application for Eni SpA and applies to subsidiaries⁷ subject to implementation as per the "Regulatory System" Policy.

In particular:

- unlisted subsidiaries and their own subsidiaries ensure its prompt implementation without possible waiver⁸ and in any case no later than 30 March 2024;
- subsidiaries with listed shares (hereinafter referred to as "listed subsidiaries") and their subsidiaries receive this document and implement the Fundamental Guidelines, without the possibility of waiver⁹. In addition, they implement the Application Modalities and might possibly adjust them to their own needs, upon communication to the relevant Process Owner, in light of specific regulatory constraints and of the company's roles and responsibilities.

The present ECG Policy also applies to Third Parties, as defined below, to all Persons performing work within Eni, regardless of their contractual status, either as Protected Persons or as persons that are required to comply with the ECG Policy pursuant to the applicable contractual clauses or statements.

This ECG Policy cancels and replaces the following Eni SpA document:

- Annex E "Eni against violence and harassment in the workplace" to MSG "Internal control and risk management system" issued on 21 December 2021.

⁷ As defined in the 'Regulatory System' Policy.

⁸ 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.

⁹ 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

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 provided by Eni's Model 231, as well as with the Compliance Models on corporate administrative liability for Eni's subsidiaries, with the cross-cutting principles set out in the "Regulatory System" Policy, and with the specific reference principles and commitments undertaken by Eni, listed below:

CORPORATE CULTURE Eni's corporate culture is based on respect, professionalism, non-discrimination and equal opportunities. Eni people are required to respect and promote the principles contained in the present ECG Policy.

PROHIBITIONS OF VIOLENCE OR HARASSMENT AT WORK Eni prohibits the perpetration of acts of violence or harassment in the workplace, as defined in the present ECG Policy, against the Protected Persons.

ZERO-TOLERANCE CULTURE Protected Persons have the right to a workplace free of violence and harassment. Eni People have the responsibility to work together to create a work environment based on respect, they should support those who report conduct or episodes of violence and harassment to the best of their capabilities and they should also cooperate in the investigations stemming from such reports. Eni's managers and employers are accountable for promoting a zero-tolerance culture of violence and harassment in the workplace, and a work environment free of violence and harassment, and for ensuring that appropriate reporting channels are made available for the timely handling of reported situations. Each manager is bound by the obligation to ensure that their employees comply with the Policy, to disseminate its principles, and to adopt measures to prevent, identify and report potential violations.

WHISTLEBLOWING REPORTS Protected Persons are encouraged to report incidents/episodes of violence or harassment of which they become aware, following the applicable reporting channels (see sect. B1 "ZERO TOLERANCE FRAMEWORK - sect. "WHISTLEBLOWING REPORTS AND SUPPORTING TOOLS"). Such reports must be lodged in good faith, without fear of retaliation, and the whistle-blower must be protected from any discrimination that might arise as a consequence of such an initiative.

THE RIGHT TO CONFIDENTIALITY Protected Persons have the right to respect for their private and family life and confidentiality. Information reported and revealed during any investigation must remain confidential, without prejudice to the right to be informed of any danger in the workplace.

PROHIBITION OF RETALIATION It is prohibited to commit any act of retaliation or victimisation against Reporting Persons, Harassed Persons, Bystanders, witnesses or informants.

PROTECTION OF THE HARASSED PERSON AND SANCTIONS. Any conduct carried out by Eni people which, following an investigation, is qualified as violence and harassment at work as set out in the present ECG Policy will be subject to appropriate measures to ensure that it is discontinued; disciplinary measures may also be applied in accordance with the provisions of applicable normative instruments. All measures and actions are adopted taking into account the safeguard of the Harassed Person's rights and needs. Third Parties and all Persons entrusted with a work-relationship with Eni regardless of contractual status who breach the provisions of the present ECG Policy shall be subject to the contractual remedies in the stipulated agreements, including suspension and termination of contract, prohibition from entering into business relations with Eni, and claims for damages.

B. APPLICATION MODALITIES

■ B.1 VIOLENCE AND HARASSMENT IN THE WORKPLACE

PREVENTION PROGRAMME

According to the Convention 190 on the Elimination of Violence and Harassment in the Workplace, violence and harassment in the workplace "affect a person's psychological, physical and sexual health, dignity and family and social environment." It therefore requires that, among other measures, the dangers and risks related to violence and harassment at work must be properly identified and appropriate measures must be taken to prevent and remedy them. These measures must be appropriate and proportionate to the various level of control of the company, and must include measurable goals.

For this reason, Eni is committed to adopting programs aimed at preventing violence and harassment in the workplace, pursuant to which dangers and risks, measures and objectives are adequately identified and assessed, in line with the applicable internal regulatory instruments.

PROMOTION OF A CULTURE BASED ON RESPECT: TRAINING AND AWARENESS-RAISING

Eni people shall be duly informed of and trained on the contents of the present ECG Policy, of Eni's Code of Ethics and of the applicable regulations, as relevant, , as well as on the shared responsibility of Eni people in so far as the promotion of a work culture based on mutual respect and on the dignity of the human being is concerned.

To this end, Eni ensures that the contents of the present ECG Policy are included in the training and information programmes that are regularly provided to all Eni people. Such programmes include, though they are not limited to:

- regular training on the Code of Ethics as a mandatory training for all employees, including new recruits (this includes the signature and acceptance of the compliance declaration);
- specific training initiatives related to the Code of Ethics and sustainability issues;
- information initiatives to raise awareness on the issue;
- health and HSE training programmes for each area, as relevant;
- communication initiatives tied to specific events/anniversaries (e.g.: international day for the elimination of violence against women, workshops organised by the Integrated Compliance function on issues concerning values).

Participation in trainings on the Code of Ethics and on sustainability issues constitutes one of the contractual obligations that Eni employees are bound to fulfil.

Human resources' training is regulated by the Human Resources regulatory instrument and specific additional documents. Pursuant to these regulations, Eni training programmes include online courses (e-learning) and classroom/distance training events where final tests are made available to verify that learning objectives are accomplished.

The training program is defined and implemented in line with a risk-based approach and also considering the outcomes of reports and the activities that they triggered.

Trainings' contents are developed by the Integrated Compliance and Human Resources functions, in conjunction with other competent corporate functions such as HSE and Health, D&I, Security and Sustainability. Such substantive content may be circulated also by the employer's instructions, in line with the specific risks identified through the risk assessment phase. When

defining and implementing the training programme, the Integrated Compliance function provides the Human Resources function with instructions on programmes' content, methodology, duration (as also prescribed by law) and learning certification requirements and it also advises on implementation methods.

As far as Third parties are concerned, as well as all Persons who carry out work for Eni in any capacity whatsoever, they too are required to make their employees aware of the contents of the present ECG Policy, in accordance with specific contractual provisions.

SUPPORTING INSTRUMENTS

In order to provide assistance and support to its People in the management of any situation of discomfort, including those of violence or harassment in the workplace (which could adversely affect their work performance, their life and/or their relationships) Eni ensures that the tools listed below are adequately circulated.

HelpLine

A confidential Service,¹⁰ supplied by a qualified expert and covered by professional confidentiality is made available in order to provide or grant psychological support to victims of harassment or gender-based violence.

The service is activated once the individual places the call and it is made sure that the individual is provided with adequate support by a psychologist.

The service can also provide appropriate information that might help individuals throughout their decision-making process and, where appropriate, might offer guidance on the local and regional structures and associations.

The Helpline communicates to the alleged victim the protection tools that Eni makes available through the channels provided in the Code of Ethics and in the specific regulatory instrument that concerns Reports, and, where appropriate, it refers them to the competent company doctor.

Mbx Code of Ethics

Eni people can refer to the Mbx Code of Ethics, managed by the Integrated Compliance function, to gather information and clarifications concerning the ECG Policy, the Code of Ethics and the available support and reporting channels.

Support for Human Resources, Security functions and leave

The Human Resources function is involved towards the end of the preliminary investigations of the whistleblowing report channel and, if the qualified company doctor/occupational physician (ML) is involved, the Human Resources function operates in accordance with the provisions of the regulations relating to whistleblowing and health with regard to the relationships with the competent company doctors/occupational physicians.

Eni people can ask for the support of the Human Resources and Security functions also for the purpose of reporting acts of violence and/or harassment in the workplace to the Police. This is without prejudice to the methods of communication relating to Security events provided for by the enforced regulatory instruments.

In the event of acts of violence posing risks to personal safety that are underway, Eni people can activate the same channels that are available for Health, Safety and Security emergencies.

Eni employees can be granted leave in accordance with the applicable provisions of the law and of the relevant collective bargaining agreement. The examination and final determination of

¹⁰ At the time of the issuance of this regulatory instrument, the service is available for Italy.

whether or not to grant the leave (methodology and their quantification) on a case-by-case basis may be carried out by Human Resources with the support of other competent functions (e.g. health, HSE, etc.).

WHISTLEBLOWING REPORTS

Eni itself adopts -and it also advises its People to adopt- a non-judgmental approach to all victims of harassment or violence in the workplace, in order to create a work environment where people can confidentially and safely report any such acts.

Any Protected Person who feels to have been subjected to a conduct that may constitute violence or harassment in the workplace, as well as any Bystander, is encouraged to report any such events through the reporting channels made available by the company.

To this effect, the reporting channels provided by Eni and regulated by the relevant regulatory instruments are made available. Reports concerning alleged violence or harassment in the workplace are handled by a specifically-trained team (training plans are prepared by the relevant functions).

The process of managing reports is structured so as to guarantee that both the alleged victim and the alleged perpetrator are fairly safeguarded; to this end, reports must detail facts, events or circumstances that constitute the basic elements of the alleged harassment or violence and shall be made in sufficient detail to allow, on the basis of the available investigative tools, a concrete verification of whether or not the reported facts or circumstances are grounded.

In any case, the activities and initiatives carried out by Eni are without prejudice to the ordinary activities carried out by the relevant authorities or other external support structures, which can always be activated by the Harassed Person.

■ B.2 INTERNATIONAL, E.U. AND NATIONAL SOURCES

The present ECG Policy has been drafted on the basis of the indications contained in the following references and sources.

International/E.U. sources.

- Convention on Freedom of Association and Protection of the Right to Organise C87 (1948)
- Convention on the Right to Organise and Collective Bargaining C98 (1949)
- Convention on Equal Remuneration for Male and Female Workers for Work of Equal Value C100 (1951)
- Convention on Discrimination in Respect of Employment and Occupation C111 (1958)
- Convention concerning the role of vocational guidance and training in human resource development C142 (1975)
- Convention on Occupational Health and Safety C155 (1981)
- Protocol relating to the Convention on Occupational Health and Safety P155 (2002)
- Declaration on the Fundamental Principles and Rights at Work and its Follow-up (1998)
- Convention on the Promotional Framework for Health and Safety at Work C187 (2006)
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (2016)
- Convention on the Elimination of Violence and Harassment in the Workplace C190 (2019) Recommendation on the Elimination of Violence and Harassment in the Workplace R206 (2019)

National sources

- Italian Legislative Decree no. 196/2003 and subsequent amendments (2003)
- Italian Legislative Decree no. 198/2006 and subsequent amendments (Equal Opportunity Code) (2006)
- Italian Legislative Decree no. 81/2008 and subsequent amendments (Consolidated Health and Safety Act) (2008)
- Interconfederal Agreement of 25 January 2016 - (Framework Agreement on Harassment and Violence in the Workplace) (2016)

- National Collective Labour Agreement for Energy and Oil
- CCNL (National Collective Bargaining Agreement) Chemical Industry
- Global Framework Agreements on Industrial Relations at the International Level and Corporate Social Responsibility, signed by Eni with IndustriALL Global Union and the Italian Sector Trade Unions FILCTEM CGIL FEMCA CISL UILTEC UIL on 21 June 2019 and Annex "Integrations to the Global Framework Agreement on International Labor Relations and Corporate Social Responsibility" (2019)
- Law no. 4 of 15 January 2021 ratifying and implementing the International Labour Organization Convention no. 190 on the Elimination of Violence and Harassment in the Workplace (2021)
- INAIL Guidelines - "Recognising and preventing harassment and violence in the workplace" (2021)
- Italian Legislative Decree 24/2023 and subsequent amendments implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and laying down provisions for the protection of persons who report breaches of national laws (2023)
- UN Global Compact and UN Women, Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template)

■ B.3 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

DEFINITIONS

BYSTANDER: a person who is present during the performance of a conduct of violence or harassment in the workplace or is informed by a victim of such a conduct but does not take direct part in it, or a person who intervenes in a situation where an act of violence or harassment in the workplace is taking place.

SECURITY EVENT: any intentional or negligent action or event that may cause actual or potential damage to human resources and to the company's tangible and intangible assets

ENI PEOPLE: all Eni employees and members of Eni corporate administration and control bodies.

HARASSED PERSON: any victim of violence or harassment in the workplace.

PROTECTED PERSONS: this category includes all Eni people, as well as all People who work for Eni regardless of their contractual status, Third parties, people in training, including trainees and interns, workers whose employment relationship has been terminated due to events that occurred while they worked for Eni, prospective candidates who begin Eni selection process, and any other person who comes into contact with Eni people or Third parties in the performance of their work activities.

WHISTLEBLOWER: person who makes a whistleblowing report on a conduct or an incident of violence or harassment in the workplace.

WHISTLEBLOWING REPORT: whistleblowing report on a conduct or an episode of violence or harassment in the workplace.

THIRD PARTY/THIRD PARTIES: any third party who collaborates or works in the name of or on behalf of or in the interest of Eni, such as customers, suppliers, contract-workers, commercial and industrial partners.