

## La posizione di Eni sui Conflict Minerals

### Overview



In questo approfondimento:

- la posizione di Eni sui "Conflict mineral" pubblicata in adempimento alla normativa della United States Securities and Exchange Commission (US SEC), solo in lingua inglese
- gli standard, le procedure e le linee guida che adottiamo e che chiediamo di adottare ai fornitori Eni
- le iniziative e le misure per monitorare e identificare tutti gli attori della catena di fornitura dei conflict minerals necessari alla funzionalità o al processo produttivo dei nostri prodotti
- il link al form da compilare per segnalare eventuali violazioni delle nostre linee guida

Eni persegue l'obiettivo di ridurre i rischi di violazioni dei diritti umani in connessione con le attività di estrazione, commercializzazione ed esportazione dei minerali del conflitto "conflict minerals" che comprendono Stagno (Tin), Tungsteno (Tungsten), Tantalio (Tantalum) e Oro (Gold) "3TG" provenienti da "conflict affected and high risk areas" nei paesi della Regione dei Grandi Laghi in Africa a causa della presenza di gruppi armati fuori legge (i paesi interessati sono la Repubblica Democratica del Congo e i paesi confinanti). La catena di fornitura e di custodia dei conflict minerals ("supply chain" and "chain of custody") sono associate a gravi violazioni dei diritti umani e ai rischi di finanziare i gruppi armati nelle zone del conflitto. La posizione di Eni sui "Conflict mineral" è pubblicata in adempimento alla normativa US SEC (disponibile solo in versione inglese).

### Background

Eni is committed to ceasing, preventing or mitigating the risks of human rights violations associated with the supply chain and chain of custody of the conflict minerals sourced from conflict affected and high-risk areas "CAHRA" in the Great Lake Region in Africa. In the Democratic Republic of the Congo and its adjoining countries, human rights violations have been found to be partially financed by the extraction, trade and exportation of the Conflict Minerals which are defined as cassiterite, columbite-tantalite, wolframite, and gold, including their derivatives, which are limited to tin, tantalum, and tungsten, collectively known as 3TG.

## **Our position**

As part of Eni's commitment of promoting responsible business conduct across all our operations and respecting and supporting human rights in our direct activities and in the supply chain including the activities performed by our Business Partners, Eni has in place guidelines, procedures and standard contractual terms & conditions that:

- Require compliance with human rights as prerequisite for qualifying to do business with us.
- Require compliance with the Eni Code of Ethics and Human Rights Guidelines as contractual obligations towards Eni.
- Require periodical checks of compliance with those standards through audits.

We believe that Eni's utilization of Conflict Minerals is immaterial to our operations and final products. Our main E&P business segment does not implicate Conflict Minerals. The same applies to our business segments that engage in the supply and sale of natural gas and in power generation from gas-fired plants as well as from renewable sources. Finally, our refining segment manufactures fuels and lubricants that may contain traces of conflict minerals as these minerals are intentionally added to the production process in the form of catalysts and may not be washed out completely from the finished products. For any of our products that contain or may contain Conflict Minerals, we will expect our suppliers (and will require suppliers to pass the same requirements on to their suppliers) to acknowledge and agree to our guidelines and procedures, including our Code of Ethics and Human Rights Guidelines. Our standard contractual terms regarding the supply of products that contain or may contain Conflict Minerals include binding and clear-cut requirements regarding Conflict Minerals and responsible sourcing. Suppliers have a contractual obligation to represent that all Necessary Conflict Minerals intentionally added to the products supplied to us are sourced in accordance with the principles of a responsible supply chain. This to support Eni's effort to use for its products minerals that do not directly or indirectly finance or benefit armed groups in CAHRA or further human rights violations. Our relationship with our suppliers is evaluated on an ongoing basis, taking into account their commitment in collaborating with Eni in building a responsible supply chain.

## **Eni's measures**

Due to the complexity of our supply chain, although we have made progress in implementing policies and procedures to help ensure responsible sourcing of Conflict Minerals, it will take us a significant additional investment of time and resources to determine the countries of origin, the mines and manufacturing facilities of our Necessary Conflict Minerals with the greatest possible level of specificity. To date, we have implemented a number of initiatives to determine the use, source and origin of any Conflict Minerals, which we deem to be necessary to the functionality or the manufacturing of our products.

These include:

- We have established a "Conflict Minerals Compliance Program" to review any use of Necessary Conflict Minerals in the manufacturing of our products. We are developing this program based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and we will take into account other international standards as appropriate.
- We have urged our relevant suppliers to implement a policy regarding responsible sourcing of Conflict Minerals, including the exercise of due diligence to trace the countries of origin and mines where these minerals have been sourced. To date all our suppliers of conflict minerals have adopted a policy regarding responsible sourcing and have made progress in tracing their respective supply chains. We have obtained representations that several smelters in our supply chain are certified as

conformant to the relevant Responsible Minerals Assurance Process (“RMAP”) standards of the Responsible Minerals Initiative.

- We have engaged with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. Our suppliers’ willingness to comply with this initiative is a factor in our sourcing decisions.
- Since the start of the compliance program, we have included in all new supply contracts entered into by the Eni Group regarding products that contain or may contain conflict minerals updated purchasing terms and conditions to reflect this policy.
- We are adopting procedures and controls and we are implementing training activities in order to raise internal awareness of the conflict minerals issues and accurately report on the Company’s activities regarding conflict minerals use and sourcing.
- We endorse transparency in implementing this policy and we make available reports on our progress to relevant stakeholders and the public.

We will continue planning and implementing steps to determine the use, source, and origin of any Conflict Minerals, which we deem to be necessary to the functionality or the manufacturing of our products.

#### **Grievance and whistle-blowing mechanisms**

- Concerns and violations of this policy can be reported to Eni via existing grievance channels for ethics or compliance violations.
- at [https://www.eni.com/portal-forms/tools/processSegnalazione.do?locale=it\\_IT](https://www.eni.com/portal-forms/tools/processSegnalazione.do?locale=it_IT).

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