

Management System Guideline

MSG Internal control and risk management system

Annex E | Eni against violence and harassment in the workplace



21st December 2021

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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.

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1. INTRODUCTION

1.1 Objectives of this document

The objective of this Annex is to define, in accordance with the principles expressed in the Code of Ethics, the general and fundamental reference principles and the prohibited conducts to ensure a working environment free from any form or type of violence and harassment, to which all the members of the corporate administrative and control bodies and all Eni's employees must commit to.

The Annex also provides guidance on the prohibition of violence and harassment in the workplace, which responds to the regulatory requirement contained within 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.

1.2 Scope of application

This annex applies to:

- Eni SpA
- Subsidiaries, directly or indirectly controlled, in Italy and abroad, following implementation according to the methods described below in paragraph 1.3.

This Annex is also applicable to Third Parties, as defined below, as well as to all Persons who perform work activities at Eni, regardless of their contractual status, both as Protected Persons and as persons required to comply with this Annex in the execution and according to the formulations provided for in the appropriate contractual provisions/statements.

1.3 Implementation procedures

This Annex is for immediate application for Eni SpA.

The subsidiaries ensure the prompt implementation of this Annex and, in any case, no later than 31st March 2022, according to the methods described in the "Regulatory System" MSG.

1.4 Role of subsidiaries

In this Annex, the steps involving a role by the Process Owner have been clearly identified, according to the standard classification below:

- information activities: the subsidiary must guarantee certain information flows to Eni SpA and vice versa, with
- reference to the activity in question;
- activities to be authorised: the subsidiary must request prior authorisation from Eni SpA, with reference to the activity
- in question;
- process regulated by Eni SpA: with reference to the activity in question, the subsidiary must operate in the reference
- process according to the regulations of Eni SpA;
- service contract: Eni SpA (or another Eni competence centre) provides activities to subsidiaries on the basis of service
- contracts.

The roles described above can be identified in the Annex using the symbols shown in paragraph 3.1.

2. REFERENCES

This Annex has been formulated on the basis of the indications contained in the following references and sources both internal and external to Eni.

2.1 Internal References

- Code of Ethics
- Policy - "Our People"
- Eni Statement on Respect for Human Rights
- Security MSG
- Regulatory System MSG
- Annex C to the Internal Control and Risk Management System MSG - "*Whistleblowing reports received, including anonymously, by Eni SpA and by its subsidiaries in Italy and abroad*"
- Annex B to the Human Resources MSG - "*Information flows in relation to alleged unlawful conduct following investigations relating to Whistleblowing reports, internal audit activities or violations of the 231 Model communicated by the company's Supervisory Board*"

2.2 External Reference

- International Labour Organization Convention No. 190 on the Elimination of Violence and Harassment in the World of Work, adopted in Geneva on 21 June 2019 at the 108th session of the General Conference of that Organization (hereinafter referred to as *Convention 190*)
- Recommendation no. 206 on the elimination of violence and harassment in the workplace (hereinafter referred to as *Recommendation 206*)
- 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
- Legislative Decree no. 196/2003 et seq. and 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 or GDPR)
- Legislative Decree no. 198/2006 and subsequent amendments (Code of equal opportunities)
- Legislative Decree no. 81/2008 and subsequent amendments (Consolidated Health and Safety Act)
- Interconfederal Agreement of 25 January 2016 - "*Framework Agreement on Harassment and Violence in the Workplace*"
- National Collective Labour Agreement for Energy and Oil
- 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
- INAIL Guidelines - "*Recognising and preventing harassment and violence in the workplace*" (2021)
- UN Global Compact and UN Women, Women's Empowerment Principles (and Gender-Based Violence and Harassment at Work Policy Template)

3. GENERAL DEFINITIONS

Bystander: a person who is present at or is informed by a victim of conduct of violence or harassment in the workplace but does not take 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 the company's administration and control bodies.

Harassed Person: person against whom the violence or harassment in the workplace is directed.

Protected Persons: this category includes all Eni's People, as well as all People who work for Eni regardless of their contractual status, Third parties, people in training, including trainees and apprentices, workers whose employment relationship has been terminated due to episodes that occurred during the period in which they worked for Eni, candidates who enter into Eni selection process, and any other person who comes into contact with Eni's 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.

Reporting: 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 or on behalf or in the interest of Eni, such as customers, suppliers, contractors, commercial and industrial partners.

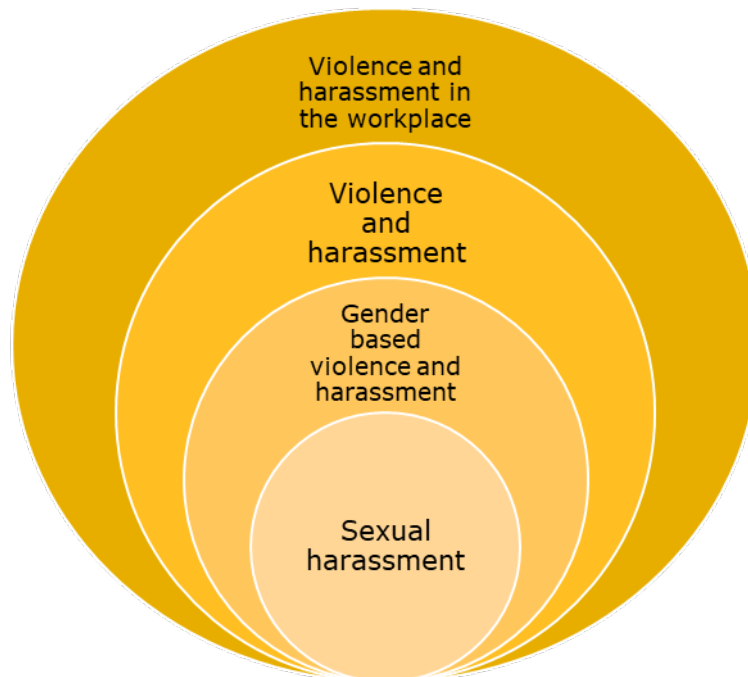
3.1 Key to roles of subsidiaries

- I A: Information activities
- A A: Activities to be authorised
- P R: Process regulated by Eni SpA
- S C: Service contract

4. DEFINITIONS OF VIOLENCE AND HARASSMENT IN THE WORKPLACE AND PROHIBITED CONDUCTS

- Without prejudice to the contents of this Annex, any conduct of violence and harassment in the workplace shall not be tolerated as it is in contrast with Eni's values and commitment.
- The following section provides a perimeter of the conduct prohibited under this Annex¹.

Conduct falling within the scope of application of this Annex:



4.1 Violence and harassment in the workplace

Violence and harassment within the scope of this Annex are violence and harassment in the workplace, intended as violence and harassment that occurs against Protected Persons on the occasion of, in connection with, or originating from work.

Therefore, workplace violence and harassment is considered violence and harassment which, by way of example and not exhaustive, occurs:

- in the workplace, including public and private spaces where these are workplaces or work-related places²;
- in places intended for breaks or lunch breaks, or sanitary facilities, or changing rooms;

¹ The same conduct may also constitute a Security Event.

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

- c) during travel or business trips, training, events or activities, including social ones³, related to work;
- d) as a result of or during business communications, including those made possible by information and communication technologies⁴;
- e) in accommodation provided by employers;
- f) during travel to and from work.

4.2 Violence and harassment

Violence and harassment are defined as any conduct - expressed in physical, verbal or non-verbal form - or the threat of such conduct, whether on a single occasion or repeatedly, that is intended to, 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 marked by unwelcome confidentiality that is not consistent with the nature of the connection with the interlocutor.
- Verbal or visual expressions that are denigrating and offensive or in any case refer to identifying elements of the person (ethnicity, nationality, religion, political affiliation, mental and physical diversity, health condition, age and any other personal data).
- Acts of bullying, mobbing, or behaviours causing a constant and permanent negative modification of the work environment, capable of affecting the right to health (so-called "*straining*"), or any other form of manipulation or psychological abuse.
- The building of a relationship of trust and emotional connection through which to manipulate, exploit or abuse another person (c.d. "*grooming*").
- Physical violence or the threat of physical violence.
- Digital/online harassment/stalking.
- Gender-based violence and harassment (defined below).

4.3 Gender-based violence and harassment

Gender-based violence and harassment refers to violence and harassment (as defined above) directed against persons because of their sex or gender, or which affects persons of a specific sex or gender, including sexual harassment. Gender-based violence and harassment include, but are not limited to:

- Violence perpetrated, in physical and/or psychological form, against a person on the grounds of his or her gender, gender identity or sexual orientation⁵, including violence against women and LGBTQIA+ persons⁶, and acts of persecution, so called "*stalking*."
- The dissemination of intimate images.
- Sexual harassment (defined below) and sexual assault, whether attempted or actual.

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.

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 to be distinguished from "*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 (understood as the subjective experience of perceiving oneself as belonging to a gender) does not necessarily correspond to the sex assigned at birth: when the gender identity does not correspond to the assigned sex, we talk about trans/transgender people. "*Sexual orientation*" means the physical, romantic, and/or emotional attraction a person has to other people, 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 indicating the inclusion of all sexual orientations and gender identities that are not hetero-conforming.

4.4 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 conduct, whether on a single occasion or repeatedly, which is intended to cause, causes or can be perceived as a violation of the dignity of the Harassed Person or the creation of an intimidating, hostile, degrading, humiliating or offensive climate.

An aggravating circumstance is the fact that the sexual harassment is accompanied by implicit or explicit threats or blackmail by hierarchical superiors or persons who can in any case influence the establishment, development and termination of the employment relationship (so-called "*quid pro quo harassment*").

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

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

5. ZERO TOLERANCE POLICY: THE GENERAL PRINCIPLES

Eni's Code of Ethics expressly rejects any behaviour constituting physical or psychological violence, coercion, harassment (including harassment of a sexual nature, howsoever made), bullying or attitudes referable to mobbing and harassment practices. In line with the provisions of the Code of Ethics, Eni **prohibits without exception** all forms of violence and harassment in the workplace within the company. Eni's "*zero tolerance policy*" is based on the following general and essential principles:

1. Eni's corporate **culture** is **based on respect, professionalism, non-discrimination and equal opportunities**.
2. Eni **prohibits the commission of acts of violence or harassment in the workplace**, as defined in this Annex, against the Protected Persons. Eni's People are required to respect and promote the principles contained in this "*Eni zero tolerance policy*".
3. Protected Persons **have the right** to a workplace free from violence and harassment. Eni's People have the **responsibility** to work together to create a working environment based on respect, to support as much as possible those who report conduct or episodes of violence and harassment and to cooperate in the relative investigations. **Eni's management and employers are responsible for promoting a zero-tolerance culture** of violence and harassment in the workplace, and a work environment free from violence and harassment, and for **ensuring that appropriate whistleblowing channels are made available for the timely handling of reported**

situations. Each head is responsible for ensuring that his/her employees comply with the Annex, for disseminating its principles, and for taking measures to prevent, identify and report potential violations.

4. Protected Persons are **invited** to report incidents/episodes of violence or harassment in the workplace of which they become aware, through the reporting channels described in Section 8. Such whistleblowing reports must be made in good faith, without fear of retaliation, being ensured that no whistleblower is discriminated against with any effect on his/her working conditions, for reason connected to the Whistleblowing Report.
5. Protected Persons have the **right to privacy and confidentiality**. Information reported and revealed during any investigation will remain confidential. This right must be reconciled with the right to be informed of any danger in the workplace.
6. It is prohibited to commit any act of **retaliation or victimization** against Whistleblowers, Harassed Persons, Bystanders, witnesses or informants.
7. Conduct by Eni's People which, following investigation, is determined to fall within the definition of violence and harassment in the workplace as per this Annex, **shall be subject to appropriate measures to ensure that the conduct is interrupted, and shall be sanctioned in accordance with the provisions of the applicable regulatory instruments, including disciplinary measures**. All measures and actions will be taken with the protection of the Harassed Person in consideration. Contractual remedies will also be taken against Third Parties, as well as against all Persons who carry out work for Eni independently of their contractual status, who violate the provisions of this Annex applicable to them according to the contractual provisions, including suspension, termination of the contract, prohibition to enter into business relations with Eni and claims for damages.

6. PREVENTION PROGRAMME

Convention 190 recognizes that violence and harassment in the workplace "*affect a person's psychological, physical and sexual health, dignity and family and social environment.*" The Convention therefore requires that, among other measures, the dangers and risks relating to violence and harassment at work must be identified and measures taken to prevent and control them. These measures must be appropriate and proportionate to the respective level of control of the company, and must include measurable objectives.

For this reason, Eni is committed to establishing programs to prevent violence and harassment in the workplace, inside of which dangers and risks, measures and objectives are evaluated, in line with the applicable internal regulatory instruments.

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

All Eni's People are required to commit to act, within the scope of their professional activity, in compliance with the Code of Ethics and the values and principles contained therein.

Eni's People shall be informed and trained on the contents of this Annex, of Eni's Code of Ethics and of the applicable regulations on the subject, as well as on the shared responsibility of Eni's People to promote a work culture based on mutual respect and on the dignity of the human being.

To this end, Eni ensures that the contents of this Annex are included in the training and information programs that are regularly provided to all Eni's People, such as, by way of example but not limited to:

- periodic training on the Code of Ethics is mandatory for all employees, including new recruits, with the consequent signing of the compliance declaration;
- specific training initiatives relating to the Code of Ethics and sustainability issues;
- information initiatives to raise awareness of the issue;
- health and HSE training programs for the relevant area;
- communication initiatives linked to specific events/recurrences (e.g.: international day for the elimination of violence against women, workshops organised by the Integrated Compliance function on value issues).

Participation in training on the Code of Ethics and on Sustainability issues constitutes, for Eni employees, proper fulfilment of their contractual obligation.

The process for human resources training is regulated by the Human Resources MSG and dedicated detail documents. In application of these regulations, an Eni's training program includes online courses (e-learning) and classroom/distance training events with possible tests to verify learning.

The contents of the training are developed by the Integrated Compliance and Human Resources functions, in conjunction with other relevant corporate functions such as HSE and Health, D&I, Security and Sustainability. The contents of the training developed will be disseminated by the employer lines, consistent with the relevant specific risks provided in the risk assessment. When defining and implementing the training program, the relevant Integrated Compliance function provides the Human Resources function with indications on training plans, methods, duration (also provided for by law) and learning certification requirements, sharing the implementation methods.

The training program will be defined and implemented in line with a risk-based approach and also considering the results of monitoring the reports received.

As far as Third parties are concerned, as well as all Persons who carry out work for Eni in any capacity whatsoever, they will be required, according to specific contractual provisions, to make their employees aware of the contents of this Annex.

8. WHISTLEBLOWING, INTERNAL INVESTIGATIONS AND HELPLINE

8.1 Whistleblowing

Eni adopts and recommends its People to adopt an approach free from any prejudice towards people who suffer harassment or violence in the workplace, in order to create a work environment in which people can confidentially and safely report any episodes.

Any Protected Person who feels he/she has been subjected to conduct that may constitute violence or harassment in the workplace, as well as any Bystander, is invited to report such circumstances through the reporting channels made available by the company.

For this purpose, the appropriate reporting channels are provided in the specific procedure Annex C to the Internal Control and Risk Management System MSG - "*Reports, including anonymous reports, received by Eni SpA and its subsidiaries in Italy or abroad*", which constitutes the regulatory reference for their management. Reports of possible violence or harassment in the workplace will be handled by a team educated and trained on the subject, on the basis of a training plan prepared by the central functions involved on the subject.

The process of managing reports shall guarantee the fair protection of both the whistleblower and the harassed person; to this end, reports shall 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 well-founded.

In any case, the activities and initiatives carried out by Eni are autonomous with respect to the ordinary activities carried out by the relevant authorities or other external support structures, which can always be activated by the Harassed Persons.

8.2 Supporting tools

In addition to the reporting channel, Eni makes available the tools listed below to assist and support its People in the management of any situations of discomfort, including violence or harassment in the workplace, which could have an impact on their work performance, their life and/or their relationships.

HelpLine

Eni makes available to his people a confidential Service, managed by a qualified supplier and covered by obligations of secrecy to give or grant psychological support to people victims of harassment or gender based violence.

The service is activated at the moment of the call to which a psychologist responds, providing psychological support and listening.

The service can also provide information, to help the person make the most appropriate decisions for his/her situation and, where appropriate, can offer guidance on the territory, through relevant structures and associations.

The Helpline informs the Eni Person about the protection tools that Eni makes available through the channels provided in the Code of Ethics and in the specific procedure Annex C to the Internal Control and Risk Management System MSG - "Reports, including anonymous reports, received by Eni SpA and its subsidiaries in Italy or abroad" and, where appropriate, refers them to a qualified doctor.

Mbx Code of Ethics

Eni's People can refer to the Mbx Code of Ethics, managed by the Integrated Compliance function, to obtain information and clarifications relating to the Annex, the Code of Ethics and the support and whistleblowing channels available.

Support for Human Resources, Security and leave/consent functions

The Human Resources function is involved at the conclusion of the preliminary investigations of the whistleblowing report channel and, if the qualified doctor/occupational physician (ML) is involved, according to the provisions of the regulations relating to whistleblowing and health with reference to relations with qualified doctors/occupational physicians.

Eni's People can ask for the support of the Human Resources and Security functions also for the purpose of reporting 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 regulatory instruments in force.

In case of ongoing episodes of violence involving risks to personal safety, Eni's People can activate the same channels available for Health, Safety and Security emergencies.

Eni employees may be granted leave in accordance with the applicable provisions of law and with any provisions of the relevant collective bargaining agreement.

The assessment on the granting of leave (methods and their quantification) in relation to specific cases, may be carried out by HR with the support of other relevant functions (e.g. health, HSE, etc.).