



## SLAVERY AND HUMAN

## TRAFFICKING STATEMENT 2022



# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

## INTRODUCTION

Eni's approach to human rights, including the prevention of modern slavery, builds on the dignity of every human being and the company's responsibility to contribute to the well-being of individuals and communities surrounding its business activities. This vision goes beyond obtaining a social license to operate, and it is an integral part of Eni's identity and business. Indeed, Eni believes that companies must

respect internationally recognised human rights, as established in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Eni is committed to maintaining and improving its practices to combat slavery and human trafficking in its operations and along the supply chain. Eni expects its Business Partners to respect human rights, has zero tolerance towards human rights violations and expects its supply chain to comply accordingly.

## ENI'S BUSINESS AND SUPPLY CHAIN

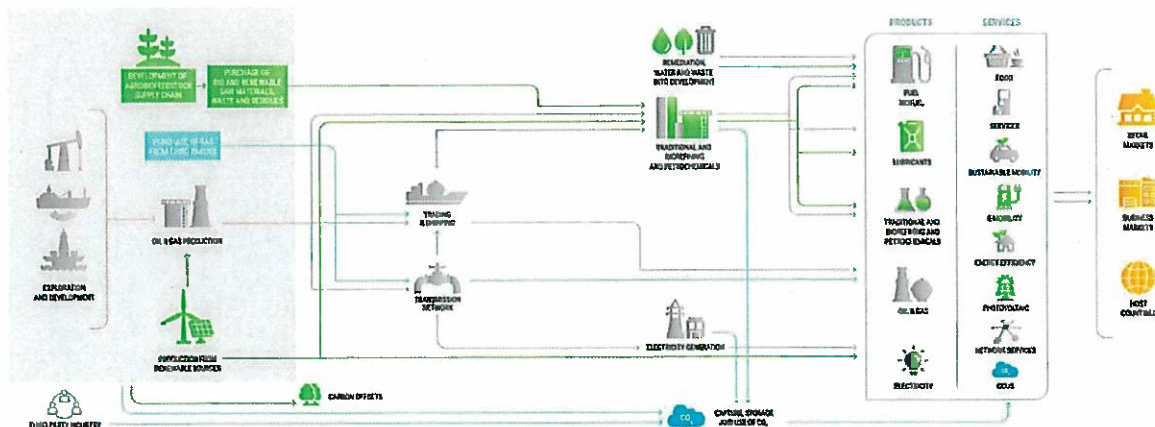
Eni is a global energy company with a high technological content, engaged in the entire value chain: from the exploration, development, and extraction of oil and natural gas to the generation of electricity from cogeneration and renewable sources, traditional and bio-refining and chemical, and the development of circular economy processes. Eni extends its reach to end markets, marketing gas, power, and products to local markets, and retail and business customers, also offering services of energy efficiency and sustainable mobility. Consolidated expertise, geographical and technological diversification of energy sources, geographical diversification and energy sources, alliances for development, as well as new business and financial model are Eni levers to meet each of the essential pillars of the energy trilemma, achieving environmental sustainability side-by-side with energy security and affordability,

while also maintaining a strong focus on value creation for shareholders. Along this path, Eni is committed to becoming a leading company in producing and selling decarbonized energy products, increasingly customer oriented.

### Eni's mission

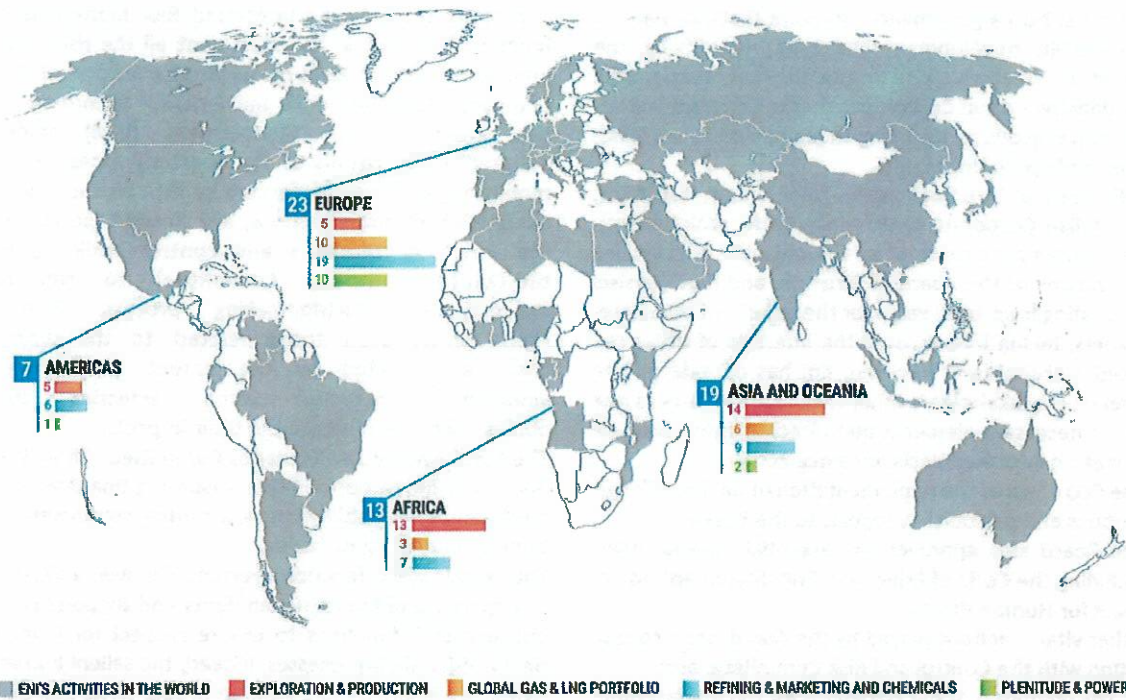
*Eni is an energy company. We concretely support a just energy transition, with the objective of preserving our planet and promoting an efficient and sustainable access to energy for all. Our work is based on passion and innovation, on our unique strengths and skills, on the equal dignity of each person, recognising diversity as a key value for human development, on the responsibility, integrity, and transparency of our actions. We believe in the value of long-term partnerships with the countries and communities where we operate, bringing long-lasting prosperity for all.*

## OUR VALUE CHAIN





Eni employs more than 32,000 people in 62 Countries around the world.

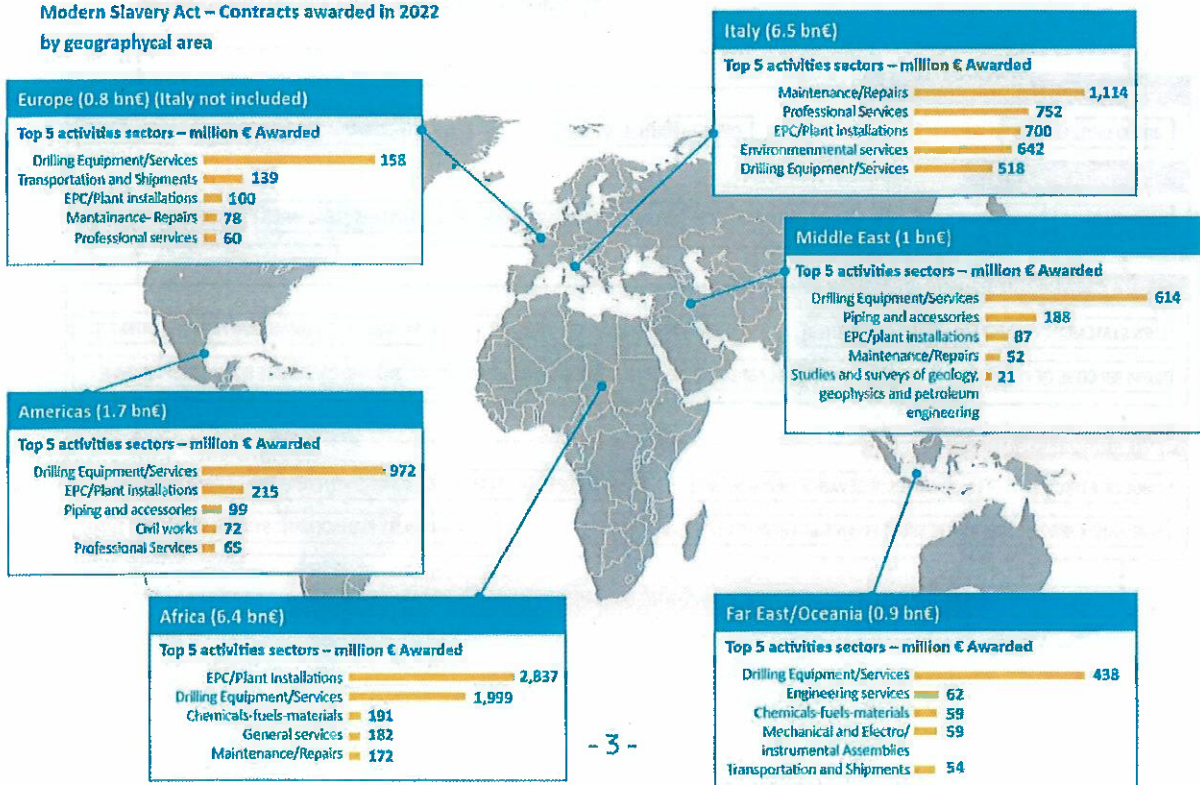


### Eni's supply chain

Eni's operations are supported by a global supply chain that includes suppliers of goods, works and services worldwide. The procurement expenditure in the Natural

Resources, Energy Evolution and Support Function business areas was approximately €17.4 billion in 2022, with 22,472 contracts awarded by its 42 procurement departments around the world.

### Modern Slavery Act – Contracts awarded in 2022 by geographical area



## HUMAN RIGHTS POLICIES AND GOVERNANCE

### Corporate Governance: focus on human rights

Eni has set up a governance structure that can support sustainable development strategies, identifying the Board of Directors of Eni SpA as the body responsible for defining - upon CEO proposal - the Company's strategy and objectives, including those related to sustainability and approving results.

Eni's Board of Directors applies from January 1st, 2021, the Italian Corporate Governance Code, which identifies "sustainable success" as the objective that guides the actions of the Board of Directors and that consists of creating long-term value for the benefit of the shareholders, taking into account the interests of other relevant stakeholders. However, Eni has considered the interest of stakeholders other than shareholders as one of the necessary elements that Directors must evaluate in making informed decisions since 2006.

The CEO ensures the implementation of the Board's resolutions and periodically reports to the Board.

The Board also approves the essential internal rules, including the Code of Ethics and Eni's Statement on Respect for Human Rights.

Other vital functions played by the Board, after consultation with the Control and Risk Committee, are:

- The definition of the guidelines for the management of risks.
- The periodic review of Eni's main business risks.
- The periodic evaluation of the adequacy and effectiveness of the Internal Control and Risk Management System of Eni.

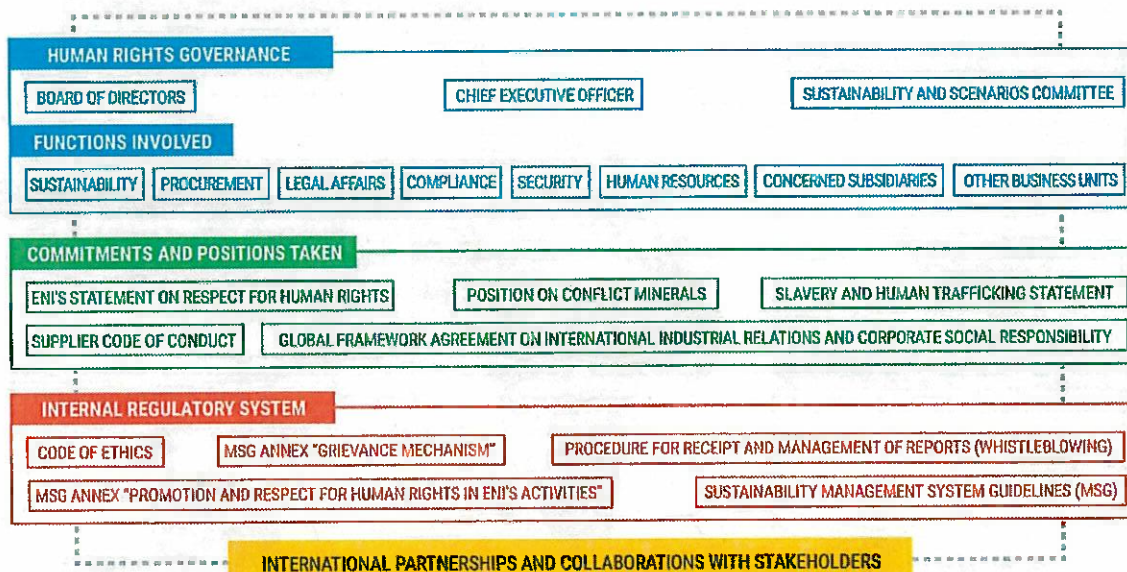
Regarding the four-year Plan, the Board of Directors is also responsible for defining the nature and level of risk

compatible with the strategic objectives of the company, based on an estimate of the probability and impact of the risks issued (and, if necessary, updated during the year) by the Integrated Risk Management function, including in its assessment all the risks that may be relevant in term of sustainable success of the Company. Regarding Eni's main risks - according to the Integrated Risk Management (IRM) model adopted - the results of the quarterly assessment/monitoring activities performed by IRM on such risks, along with treatment actions, are timely reported to the Board of Directors and control bodies (e.g. the Control and Risk Committee) to support the corporate decisionmaking process. Human rights issues, even those related to the supply chain, are included to the extent a potential violation is detected when assessing the above risks and measuring their impacts.

The Sustainability and Scenarios Committee, within the Board, has the responsibility to advise the Board on scenarios and sustainability issues, including recommendations on human rights issues.

The Sustainability function oversees the overall day-to-day approach of Eni to human rights and supports Eni's business/staff functions to ensure respect for human rights within their processes. Indeed, the salient human rights issues identified by Eni according to its due diligence process are clustered into four focus areas, each owned by a specific function. One of these focus areas is dedicated to the relationship with business partners along the supply chain.

The relevant local sustainability functions support those in charge of industrial projects and ensure the implementation of Eni's human rights due diligence at the local level, including context-specific human rights issues.





### Policies and rules on human rights

Eni's work is guided by the values and principles described in the Code of Ethics, Eni's Statement on Respect for Human Rights, and the Suppliers Code of Conduct.

The [Code of Ethics](#) sets out the central values that guide Eni's actions and contains effective rules of behaviour so that the principles contained therein form a practical guide for corporate operations. The Code of Ethics prohibits all forms of forced and/or child labour and enunciates Eni's commitment to defining and disseminating policies, standards and rules that guide the actions of its suppliers and partners towards respecting human rights and its principles of sustainability. The Code of Ethics is part of the "General framework of regulatory system", which inspires the provisions contained in Eni's regulatory instruments and the model of organization, management and control. The Code of Ethics applies to all direct or indirect subsidiaries in Italy and abroad and all Eni's stakeholders. The Code was significantly updated on March 18th 2020.

[Eni's Statement on Respect for Human Rights](#), approved in December 2018 by the Board of Directors, mirrors the requirements set out in the UNGPs, starting from an explicit commitment to implementing both the human rights due diligence and providing access to remedy. The Statement contains a detailed section on Business relationships and respect for human rights in the supply chain, providing instructions on assessing risks of human rights abuses in the supply chain. Specifically, on slavery and human trafficking, the Statement includes Eni's commitment to maintain and improve its practices to identify and combat these human rights violations in its supply chain.

Besides, a new internal procedure annexed to the Internal Management System Guideline "Responsible and sustainable enterprise", named "Respect and promotion of human rights in Eni's activities", was delivered on March 2020. This document regulates how to perform human rights due diligence internally and provides a concrete approach to the commitment expressed in Eni's Statement on Respect for Human Rights. The [Global Framework Agreement](#) on International Industrial Relations and Corporate Social Responsibility (GFA), renewed by Eni, the IndustriALL<sup>1</sup> Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL<sup>2</sup> trade unions in June 2019, includes specific provisions regarding the respect for international standards on human and labour rights as well as appropriate clauses against any violations of such rights, in addition to the requirements for qualifying suppliers and subcontractors. The Parties to the Agreement meet annually to share information on specific issues, including sustainability and human rights.

In line with the Code of Ethics and Eni's corporate culture, which promotes inclusion and respect for

uniqueness, in December 2021 Eni issued a policy against violence and harassment in the workplace. Under the principles of the Geneva Convention of the International Labour Organisation, the [Zero Tolerance policy](#) defines a broad perimeter of types of harassment that allows us to identify misconduct and behaviour that should not be engaged in and should be reported. Eni wants to increasingly ensure a working environment free from any form of violence and harassment, where we can all feel protected and free to express ourselves.

Finally, the [Suppliers' Code of Conduct](#) sets Eni's expectations on suppliers regarding compliance with internationally recognised human rights standards and describes Eni's position regarding laws, integrity, and transparency. It entails obligations for suppliers to take action against modern slavery, child labour, and discrimination in the workplace and for the protection of workers' rights in general.

In this respect, Eni operates within the reference framework of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the ILO - International Labour Organization -, the UNGPs and the OECD Guidelines for Multinational Enterprises.

### HUMAN RIGHTS DUE DILIGENCE AND RISK MANAGEMENT

The internal procedure mentioned above, "Respect and Promotion of the Human Rights in Eni's Activities", part of Eni's Management System Guidelines, establishes Eni's approach to human rights due diligence. This procedure represents a fundamental framework for all the people involved in preventing human rights violations and managing human rights issues; the due diligence is set on an iterative (not once-off) process, context-specific and covers the entire spectrum of human rights implications for Eni. Eni's human rights due diligence model aligns with the UNGPs and the OCED Guidelines; it is designed to be multidisciplinary, multilevel, and integrated at any level of the company's processes. It follows a risk-based approach to identify, prevent, mitigate, and account for adverse corporate impacts on human rights. The risks identified through due diligence are defined as risks to rights-holders, extending the traditional company's risk management perspective. Eni has been developing and implementing different approaches and processes aimed at identifying impacts on human rights, especially ones linked to workforce management – direct and indirect (in the supply chain), such as modern slavery and human trafficking.

1. Organization that represents more than 50 million workers distributed in 140 Countries, in the energy, manufacturing and mining sectors.  
2. Main Italian trade union organizations

Finally, risks of potential human rights violations are mapped by the "Integrated Country Risk" (ICR), including modern slavery, whose purpose is to offer an integrated analysis of risks existing in Countries of either presence or interest for the company. A third-party provider (Verisk Maplecroft) is used to evaluate the human rights risks of the Countries.

**Assessing and managing risks related to direct workforce**

Eni is aware that in some Countries of operations, relevant risks related to human rights violations can be detected, including modern slavery. Conscious of this, Eni has an articulated framework of policies, management models, contractual clauses, and practices in place to be adopted by Eni's subsidiaries<sup>3</sup>. These align with the commitments undertaken by the parent company in the Code of Ethics and Eni's Statement on Respect for Human Rights. They allow these risks in direct workforce management to be managed effectively.

In 2020, an evaluation model was set up to assess human rights in the workplace. It is a "risk-based" model, which segments Eni subsidiaries according to specific quantitative and qualitative parameters aimed at outlining the issues and risks of the country/operating context that are linked to the human resources management process, including contrasting all forms of discrimination, gender equality, working conditions,

freedom of association and collective bargaining. This approach identifies possible areas of improvement, requiring specific actions to be defined and monitored over time.

During 2022 the application of the model was deepened in the subsidiaries of the upstream business already subject to monitoring in 2021 and has been carried out a first application in the Energy Evolution business area.

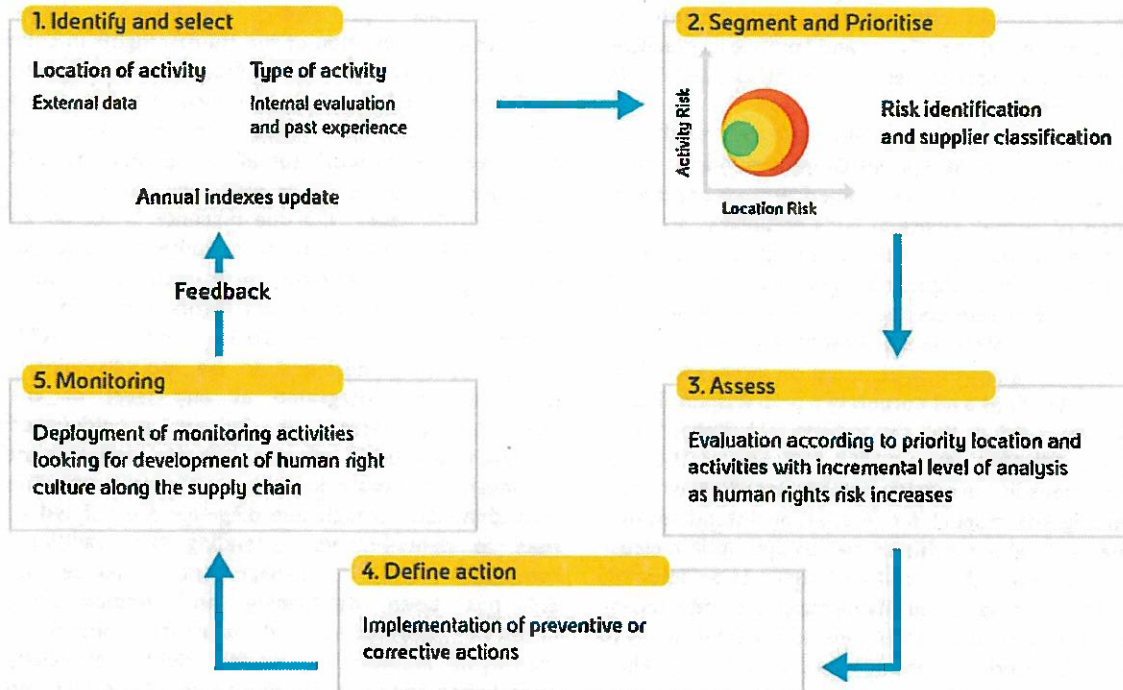
**Assessing and managing risks along the supply chain**

Respect for human rights along the supply chain is an essential prerequisite for Eni. This commitment is carried out through the procurement process by adopting an evaluation model based on human rights and transparent and impartial conduct in selecting suppliers.

Eni applies the human rights risk-based model through which suppliers are monitored throughout the procurement process to assess and manage human rights along the supply chain. The risk model evaluation is based on an objective and transparent approach, leading to a supplier's classification according to the potential risk of human rights violations. Such risk is deduced considering the supplier's Country and the type of performed activity.

The model allows Eni to improve and strengthen the

**Eni's approach to assess and manage risks along the supply chain**



3. Operating independently and having determined on implementation of those policies for themselves.



attention to respect for human rights in the riskiest geographical areas in which Eni operates. Applying the risk-based model in 2022, Nigeria, Congo and Mozambique had the highest number of suppliers at risk.

The model provides for differentiated control methods related to the different risk levels (the higher the risk of the supplier, the higher the level of detail of the assessment) inspired by international standards such as SA8000.

In the procurement process, the suppliers are subject to a continuous evaluation through:

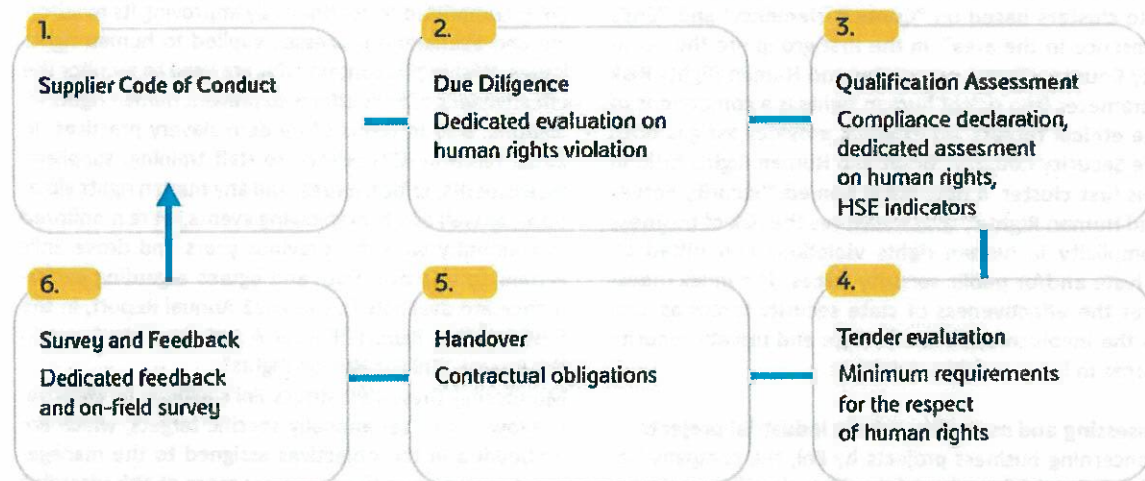
- 1) Subscription of the Supplier Code of Conduct: to become or maintain the status of Eni's supplier, all companies that are willing to collaborate with Eni are requested to undersign the Supplier Code of Conduct, which is based on social responsibility's principles, among which human rights are. The Supplier Code of Conduct represents a mutual commitment to recognising and protecting the value of all its people, operating with integrity, protecting company resources and promoting adopting such principles with their people and in their supply chain.
- 2) Due Diligence verifications about involvements in human rights violations, carried on independently from the supplier's human rights risk level by open-source

information.

- 3) Periodical qualification assessment based on performance indicators, documental or on-site audits and dedicated questionnaires to minimise the risks of human rights violations.
- 4) Adoption and evaluation of human rights minimum requirements during the Tender phase, particularly in the case of activities with potential high human rights risk.
- 5) Evaluation and monitoring during contract execution of Eni's contractors and subcontractors by on-site audits to prevent any forms of modern slavery such as forced labour, child labour, discrimination or unequal wages.
- 6) Feedback processes with focus analysis on respecting human rights and requests to implement improvement actions if there are critical issues. If minimum standards of acceptability are not met, the supplier is excluded from Eni vendor lists and all business is interrupted.

The result is a comprehensive approach for risk identification, prevention, and mitigation in every stage of the procurement process, from supplier selection to tender evaluation and performance monitoring along the entire supply chain.

#### Control measures to ensure respect for human rights in the procurement process



By applying the risk-based model in 2022, Eni has reached the target of more than 6,000 suppliers assessed on social responsibility, including respect for human rights, to prevent the risk of human rights violations along Eni's supply chain. In addition, during 2022, more than 350 in-depth human rights evaluations were carried out through documental and on-fields audits. In the contract execution phase, more than 2,000 feedback questionnaires have been evaluated, with 63 related to a potential violation of human rights. The in-depth assessment revealed

that none were related to modern slavery issues. Furthermore, to promote the respect and management of human rights along the supply chain during 2022, all procurement resources in Italy and abroad received dedicated training on the abovementioned human rights evaluation model. Eni also organized training initiatives and webinars for Italian and international suppliers.

Awareness and development initiatives destined to suppliers and general companies have been arranged through:

■ Open-es is an alliance that combines entrepreneurial, financial and associative networks, supporting all stakeholders on their sustainable development path through a digital and innovative platform. Today involving more than 10,000 companies and 20 partners, the initiative represents an inclusive and collaborative community with a virtuous commitment to ESG targets to support companies in measuring and improving their sustainable performances. For Eni's procurement process, participating in Open-es is essential to evaluating and valorising suppliers' commitments to enhancing their competencies on ESG topics such as managing and mitigating human rights risks like child labour and forced labour.

■ The "Basket Bond Sustainable Energy" program, an innovative financial solution that allows access to capital to support the realisation of sustainable projects. In 2022, €23 million in minibond have been financed to eligible companies according to their current and expected sustainable profile for projects and investments suitable to achieve one or more United Nations Sustainable Development Goals, including promoting Respect for Human Rights.

#### Assessing and managing risks with security providers

The human rights issues potentially deriving from private security forces working for Eni, modern slavery included, are assessed by a risk model updated in 2022. The model considers specific parameters, split into clusters based on "Context elements" and "Eni's presence in the area". In the first group are the Security Country Threat parameter and Human Rights Risk parameter (the risk of human rights is a component of the ethical threat). An external provider assigns both the Security Country Threat and Human Rights Risk. In this first cluster, a new index named "Security Forces and Human Rights"<sup>4</sup> also measures the risk of business complicity in human rights violations committed by private and/or public security forces. The index measures the effectiveness of state security forces as well as the involvement of both state and private security forces in human rights violations.

#### Assessing and managing risks in industrial projects

Concerning business projects by Eni, the company has adopted a risk-based model, which classifies upstream projects according to their potential human rights risks. The model considers a mix of parameters connected to the operating context, the Countries hosting the activities, and the project characteristics, to identify appropriate management measures to prevent and mitigate possible specific impacts. Higher-risk projects are specifically investigated through a "Human Rights Impact Assessment" (HRIA) or "Human Rights Risk Analysis"

(HRA) – the latter carried out according to a desk-based analysis methodology developed in 2021 – to identify measures to prevent potential impacts on human rights and manage the existing ones. In 2022, these investigations were conducted on the agri-feedstock projects implemented in Congo and Kenya<sup>5</sup>, identifying recommendations aimed at mitigating potential adverse impacts, also by engaging more than 1,000 people from local communities in surveys and meetings, as well as NGOs, Trade Unions representatives and other Institutional stakeholders. Such recommendations will be addressed in specific Action Plans to be implemented in 2023.

During the year, the Action Plans for the 2021 assessments were also implemented: at Cabinda Centro in Angola, Block 47 in Oman, the Dumre Block in Albania and Area C of the Sharjah Emirate (UAE). All HRAs and HRRAs reports conducted up to 2020 and the related Action Plans adopted, including periodic reports on the progress of such Plans, are publicly available on the Eni website<sup>6</sup>. The Action Plans adopted include several actions to prevent any risk of modern slavery, among others: reinforced labour rights requirements have been added in the contracts with the suppliers providing primary services, new on-field checks, audits, and monitoring activities.

#### ASSESSING EFFECTIVENESS

Eni is committed to continuously improving its monitoring and evaluation processes applied to human rights issues. Within this context, KPIs are used to monitor the effectiveness of Eni's efforts to prevent human rights violations, also in terms of modern slavery practices. In 2022, relevant KPIs related to staff training, suppliers' assessments, critical issues, and any human rights violations, as well as whistleblowing events, were monitored in continuity with the previous years and drove Eni's actions to improve. Data and figures regarding performance are available in the 2022 Annual Report, in the Sustainability Report "Eni for A Just Transition" and in the Report "Eni For Human Rights".

Monitoring these KPIs drives Eni's actions to improve. It allows us to set annually specific targets, which are embedded in the objectives assigned to the management in charge of the processes more at risk regarding human rights impact. The Sustainability Department is responsible for proposing and monitoring progress in such Management Objectives, including respect for human rights in the supply chain.

The internal audit program is also highly relevant for assessing the effectiveness of the internal regulation and its application to human rights.

Periodically, at least once a year, the approach towards

4. This new indicator is provided by the database of Verisk Maplecroft, a leading research firm specialising in global risk analytics, country risk insight & trusted advisory.

5. <https://www.eni.com/en-IT/circular-economy/biofuels-africa.html> <https://www.eni.com/en-IT/circular-economy/biofuels-africa.html>

6. <https://eni.com/en-IT/just-transition/respect-for-human-rights.html>



modern slavery and broadly on human rights is reported to the Sustainability and Scenario Committee.

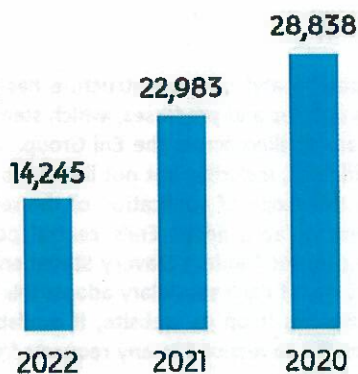
## TRAINING AND AWARENESS

Eni considers training and awareness-raising activities dedicated to its employees and Business Partners an essential element of its commitment to respecting human rights. Eni wants to ensure that every employee is aware of the importance of human rights to the Company. Over the last few years, Eni has developed a wide range of training courses on business and human rights, differing in terms of format and content, to offer Eni's employees and Business Partners the learning opportunities that best suit each need.

Eni's training on Business and Human Rights is organized in a diversified strategy along four guidelines:

1. General courses on Business and Human Rights for all Eni people.
2. Specific courses on topics and areas particularly exposed to risks of negative impacts.
3. Training initiatives on issues closely linked with human rights (e.g. Code of Ethics, HSE, etc.).
4. Training courses on Security and Human Rights.

### Hours of training on human rights



This year, more than 14,000 hours of training were provided among staff and middle and top managers on the human rights program.

In 2019 a training module dedicated to human rights risks along the supply chain was launched and addressed to Eni's Procurement professionals. This target has been extended over the last three years. Participants were trained on modules shaped on two case studies: 1) the first one addresses the topics of working conditions, working hours and vulnerable workers; 2) the second one is focused on modern slavery practices

such as wage deductions and passport retentions. Both case studies terminate with a description of Eni's expectations in terms of both remedies for abused workers and approach with the supplier. Moreover, Eni invites suppliers to participate in training sessions led by internal and external professionals to raise awareness on social issues, including workers' rights.

Another initiative concerning the services providers is the Training Program on Human Rights and Security, which has been delivered to public and private Security forces. The Program, as mentioned, has been running since 2009 with the participation of Security providers in Italy and globally and will continue to involve Countries in which Eni operates. Training sessions have been held in 15 Countries in the last 13 years.

Finally, in 2022 Eni collaborated with the IPIECA and the Building Responsibly Initiative to develop, test and review a training course for contractors and suppliers on labour rights, including modern slavery risk, associated with the construction of large projects. The training course was developed with Ergon, a specialist labour rights consultancy, to grow contractor capability and support them in addressing labour rights issues. The training has a modular approach focusing on core issues, freedom of association, fair recruitment, decent wages, working hours, and the availability of effective worker grievance mechanisms.

## WHISTLEBLOWING AND GRIEVANCE MECHANISMS

All of Eni's people, stakeholders and other third parties, including contractors and suppliers' employees, can report any wrongdoing which extends to human rights violations, including modern slavery, as described in the internal regulation "Whistleblowing Reports received (including anonymously) by Eni SpA and its subsidiaries in Italy and abroad", in complete confidence and without fear of retaliation. All the whistleblowing reports received are thoroughly investigated and disclosed with the related appropriate remedial actions taken. Annual information about whistleblowing reports received and actions taken is published in Eni's Annual Report, in "Eni for Performance" and on the website<sup>7</sup>.

Among the issues received through the whistleblowing channel in 2022, Eni has identified no cases of modern slavery. However, for completeness, Eni received reports of late or partial payment of wages and overtime by suppliers to their personnel, extended working hours and issues related to daily shifts. All the reports received were managed according to the whistleblowing procedure, and for those reports proved founded<sup>8</sup>, remediation measures have been applied, including workers repaid monies owed; review of employment contracts form proposed by recruitment agencies to

7. <https://www.eni.com/en-IT/about-us/governance/notifications.html>  
8. 3 cases



workers; review of the status of the supplier qualification and adoption of contractual remedies where applicable; reinforced processes for the monitoring of suppliers' conduct, strengthened checks on the recording of the working time (e.g. timesheet); and on the respect of daily working hours.

Moreover, operational-level Grievance Mechanisms are defined based on a proactive and structured approach to receive, recognise, investigate, respond, and resolve complaints from individuals or groups of individuals in a timely, planned, and respectful manner. These Grievance Mechanisms make it possible to manage risks and foster a positive relationship with stakeholders, as well as provide remediation in case of non-compliance. No grievances were received in 2022 referring to modern slavery. Details are available in "Eni for A Just Transition" and "Eni for Human Rights".

### MULTI-STAKEHOLDER INITIATIVES

Engagement with representatives of rights-holders is an essential activity of Eni's human rights approach. The annual meeting with the IndustriALL Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL trade unions envisaged within the GFA, for example, is a pivotal opportunity to share information on Eni's performance, actions and plans concerning HSE and Sustainability (including main HSE indexes related to employees and contractors), reports or grievances about human rights issues (if any) and positive actions in favour of non-discrimination.

Furthermore, Eni builds long-term relationships with renowned human rights experts and organizations to reach multiple goals ranging from undertaking joint actions to improving its understanding of cutting-edge topics, from contributing to the debate on business and human rights to exchanging lessons learned and best practices.

On 8 December 2022, Eni obtained the status of "Full Member" of the Voluntary Principles Initiative, the multi-stakeholder initiative involving the leading energy companies in protecting and promoting Human Rights; this status establishes the explicit recognition of the efforts made by Eni in Human Rights issues. The result comes from work that took more than two years. In 2020, the Voluntary Principles Initiative admitted Eni as an "Engaged Corporate Participant". In the two years that followed, Eni proved its wide-ranging commitment to these Principles by all Functions involved in their application and dissemination through action.

Among the activities carried out by Eni in 2022, we highlight (i) the drafting of the Annual Report, addressed to the VPI and concerning the description of the activities carried out during the year to implement the Voluntary

Principles on Security & Human Rights; ii) the Implementation Plan & Progress, i.e. a video conference with the entire VPI audience to illustrate the activities carried out by Eni in the Implementation Plan, a document drawn up by the VPI and aimed at the admission of Eni as Full Member.

The most significant action in 2022 concerned Nigeria and consisted of the organization and application for the VPI of the "Conflict Analysis Tool", a document VPI proposed to Eni to pave the way into applying this project. This tool aims to analyse causes of conflict within a country and identify which causes are more decisive in generating it. Moreover, Conflict Analysis Tool seeks to identify the actions that Eni should adopt to mitigate the causes of the conflict in the Country.

Moreover, Eni is an active member of the IPIECA's<sup>9</sup> Social Responsibility Group, Human Rights Working Group (HWG) and Supply Chain Working Group (SCWG), where the most relevant issues for the industry are discussed, and guidance is prepared. Within this context, Eni collaborated in drafting the guidance "Labour rights risk identification in the supply chain"<sup>10</sup> and its related operating tool, as well as the training platform for suppliers and contractors described in the previous paragraph. Finally, Eni is a member of the UN Global Compact, the World Business Council for Sustainable Development and actively participates in workstreams on labour-related topics.

### CONSULTATION

Eni's organizational and business structure has highly integrated its policies and processes, which stem from Eni SpA and are applied across the Eni Group. All Eni Group's subsidiaries, including but not limited to those falling within the scope of application of the relevant slavery statement laws, adopt Eni's central policies, including the present Modern Slavery Statement. The Board of Directors of each subsidiary adopts this Statement and publishes it on its website, if available, or maintains it on file to respond to any requests from interested stakeholders.

Efforts to prevent slavery risks within and around the company similarly consist of an integrated process involving the collaborative work of various specialised units and departments. These include the following functions: Sustainability, Compliance, Internal Audit, Procurement, Risk Management Integrated, Human Resources, Governance, Security, and Eni Corporate University. Under the Sustainability Function's lead, each of these units and departments was involved in preparing and drafting this Statement to ensure that the document reflects accurate and updated information.

Moreover, the human rights due diligence model,

9. Association of sustainability on environmental and social issues in the Oil & Gas sector.

10. <https://www.ipieca.org/resources/good-practice/labour-rights-risk-identification-in-the-supply-chain/>



adopted by Eni SpA at the central level and managed by the Sustainability Function, operates through integrated information flows from Internal functions and Group's subsidiaries to the Sustainability Function. This includes, for instance, the involvement of the Internal Audit Function in the quarterly analysis of whistleblowing reports received concerning human rights and the evaluation - in consultation with the subsidiaries - of potential remedial measures, the analysis carried out by the procurement function of any potential risks identified in the activities carried out by suppliers and the evaluation - also with the support of the subsidiaries - of remedial measures. Another example is the collaborative work of various functions, including Compliance, Negotiations and the subsidiaries, to include standard human rights clauses in all contracts with third parties (including Joint Operating Agreements and Petroleum Contracts), which require, among other things, all Parties to such agreements to avoid/prevent child labour, forced labour, and slavery practices as well as ensure decent work conditions and labour rights.

#### MOVING AHEAD

In 2023 Eni will take further necessary steps to spread and consolidate a culture of respect for human rights by strengthening the effectiveness of the risk-based Human Rights Models in the supply chain in Italy and abroad and related management actions. Dedicated awareness activities will be implemented for high-risk and strategic suppliers leveraging a systemic approach.

Concerning compliance, Eni is taking note of legislative developments occurring at both national and regional EU levels regarding corporate sustainability and human rights due diligence, such as the proposals for a Regulation on prohibiting products made with forced labour in the European Union market and for a Directive on Corporate Sustainability Due Diligence. Once adopted, the latter legislative proposal, published on 23 February 2022, will lead to standardised human rights obligations across the continent and beyond. Eni has long been structuring and implementing human rights processes in line with International standards and best practices, focusing on the United Nations Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises, from which the European Commission's Proposal draws inspiration. Thus, Eni has been laying the groundwork to further strengthen such processes in anticipation of any new applicable laws that will be adopted in business and human rights.

Moreover, Eni's training plan will be implemented to continue promoting shared knowledge on human rights and creating a common language on the issue at the company level, especially in those departments and business areas playing a key role in managing the respect for human rights.

Concerning the risk models adopted, specific training and awareness activities will be provided to all procurement professionals worldwide and other professional families involved in the models' implementation.

An internal procedure will also be adopted to define new standard human rights clauses to be applied – through a risk-based approach – in all other contracts signed by Eni and those with suppliers.

This statement refers to the entire Eni Group<sup>11</sup> (herein referred to as "Eni", "it", or "its") following the UK Modern Slavery Act 2015, in particular with Article 54, and the Australian Modern Slavery Act 2018, in particular with section 14. It describes the steps taken by Eni in 2022 to prevent slavery and human trafficking in its supply chain or any part of its own business<sup>12</sup>.

In the Annex are listed the Group's companies for which there is a disclosure obligation according to one or both regulations (UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018).

UK Modern Slavery Act (2015) – recommended criteria	Australian Modern Slavery Act (2018) – mandatory criteria	Eni's Slavery and Human Trafficking Statement
Organisation's structure, its business and its supply chains.	Identify the reporting entity.	<i>Eni's business and supply chain</i>
	Describe the reporting entity's structure, operations and supply chains.	
Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk	Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each reporting entity owns or controls.	<i>Human rights due diligence and risk management</i>
Organisation's policies concerning slavery and human trafficking; its due diligence processes concerning slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes.	<i>Human rights policies and governance Human rights due diligence and risk management Training and awareness Whistleblowing and grievance mechanisms</i>
Organisation's effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains is measured against such performance indicators as it considers appropriate.	Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions to assess and address modern slavery risks.	<i>Assessing effectiveness</i>
	Describe the consultation process with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls.	<i>Consultation</i>
	Any other relevant information	<i>Moving Ahead</i>

This statement is made pursuant to the UK Modern Slavery Act 2015 and was approved on 24 May 2023 by the Board of Directors of Eni JPDA 03-13 Limited a consolidated subsidiary of Eni SpA.

Francesco Pagano  
Francesco Pagano (May 30, 2023 15:28 GMT+1)

Title: Director  
Name: Francesco Pagano  
Date: May 30, 2023

This Statement was approved by the Board of Directors of Eni SpA on April 27<sup>th</sup>, 2023.

  
Claudio Descalzi  
CEO Eni SpA

Date: 27<sup>th</sup> April 2023

11. Eni Group refers to the parent company Eni SpA and its consolidated subsidiaries as identified in the Annual Report.

12. Annex A lists Eni subsidiaries that fall within the scope of application of the Modern Slavery Act 2015 and/or the Australian Modern Slavery Act.

This statement is made pursuant to the Modern Slavery Act 2018 (Australia) and was approved on 24 May 2023 by the Board of Directors of Eni JPDA 03-13 Limited, a consolidated subsidiary of Eni SpA.

Title: Managing Director  
Name: Ernest Delfos  
Date: 22 June 2023



## Annex A

**LIST OF ENTITIES FALLING WITHIN THE SCOPE OF APPLICATION OF THE UK MODERN SLAVERY ACT 2015 AND/OR AUSTRALIA MODERN SLAVERY ACT 2018 AND REQUIRED TO COMPLY WITH THE REPORTING OBLIGATIONS THEREUNDER (WHO THUS FORMALLY ADOPT ENI SPA STATEMENT WITH THEIR OWN BOARD OF DIRECTORS' RESOLUTION):**

*Versalis SpA; Versalis UK Ltd.; Versalis International SA (branch UK); Eni International B.V.; EniProgetti SpA; Eni International Resources Ltd; Eni Global Energy Markets SpA; Eni Trade&Biofuels SpA; Finproject SpA; Finproject India pvt Ltd; Eni UK Holding Plc; Eni UK Limited; Eni JPDA 03-13 Limited; Eni Australia BV;; Eni Plenitude SpA Società Benefit; Burren Energy (Egypt) Limited; Burren Energy India Limited; Burren Energy Plc; Eni Ambalat Limited; Eni Arguni I Limited; Eni Australia Limited; Eni BTC Limited; Eni Bukat Limited; Eni CBM Limited; Eni Côte d'Ivoire Limited; Eni East Ganai Limited; Eni East Sepinggan Limited; Eni Elgin/Franklin Limited; Eni Ganai Limited; Eni Hewett Limited; Eni Hydrocarbons Venezuela Limited; Eni India Limited; Eni Indonesia Limited; Eni Investments plc; Eni In Amenas Limited; Eni IS Exploration Limited; Eni Krueng Mane Limited; Eni Lasmo plc; Eni Liverpool Bay Operating Company Limited; Eni LNS Limited; Eni Middle East Limited; Eni Mozambique Engineering Limited; Eni North Ganai Limited; Eni Oil Algeria Limited; Eni Rapak Limited; Eni TNS Limited; Eni UHL Limited; Eni UKCS Limited; Eni ULT Limited; Eni ULX Limited; Eni West Ganai Limited; Eni West Timor Limited; Eni Yemen Limited; Liverpool Bay Limited; Liverpool Bay CCS Limited.*

