



SLAVERY AND HUMAN

TRAFFICKING STATEMENT 2020



# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020

## INTRODUCTION

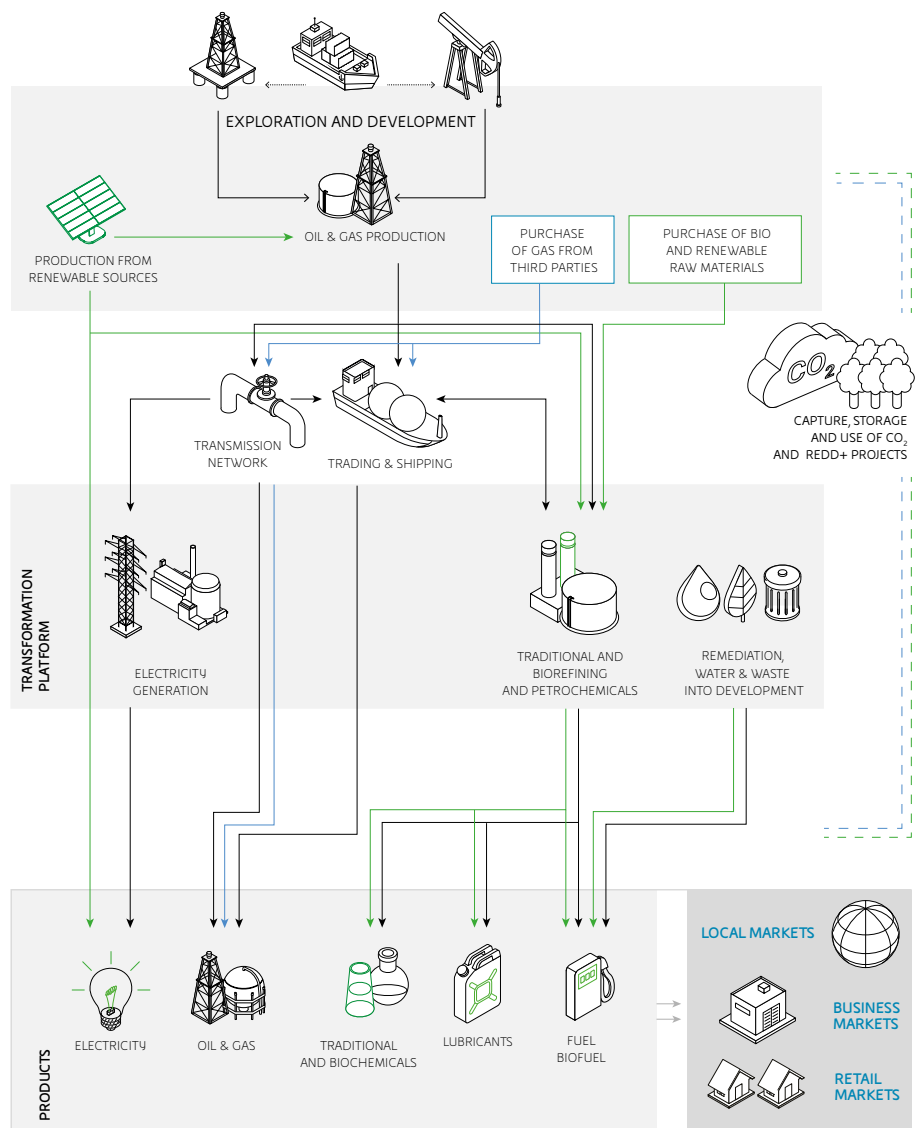
Eni's approach to human rights, including to the prevention of modern slavery, builds on the dignity of every human being and on the companies' responsibility to contribute to the well-being of individuals and communities surrounding its business activities. This vision goes beyond obtaining a social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

Indeed, Eni believes that business must respect internationally recognized human rights, as established in the UN Guiding Principles on Business and Human Rights (UNGPs). Eni is committed to maintaining and improving its practices to combat slavery and human trafficking in its operations and supply chain and expects its Business Partners<sup>1</sup> to respect human rights. Eni has zero tolerance towards such human rights violations and expect its supply chain to comply accordingly.

## ENI'S BUSINESS AND SUPPLY CHAIN

*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, recognizing 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.*

Eni is a global energy company, 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 biorefining and chemicals, and the development of circular economy processes. Eni extends its reach to end markets, selling gas, electricity and products to retail and business customers and local markets. Both CO<sub>2</sub> capture and storage initiatives and forest conservation projects (REDD+ initiatives) will be implemented to absorb residual emissions. Consolidated expertise, technologies



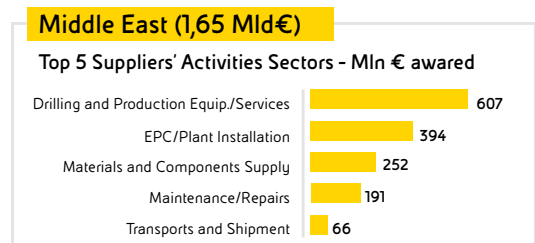
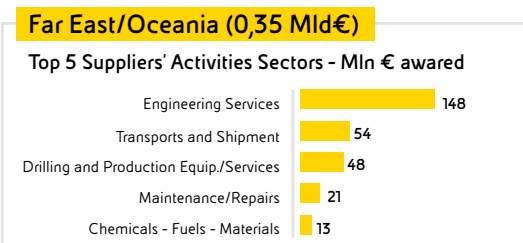
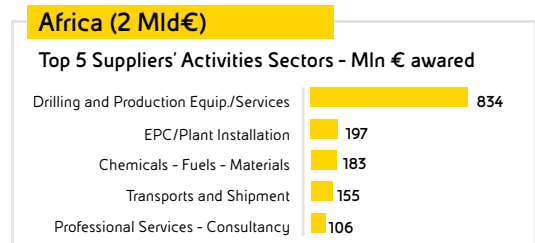
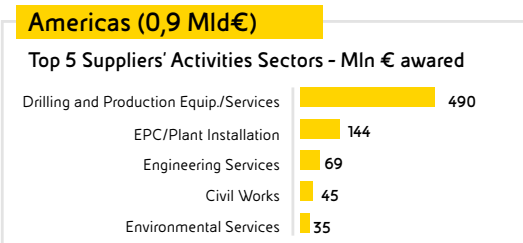
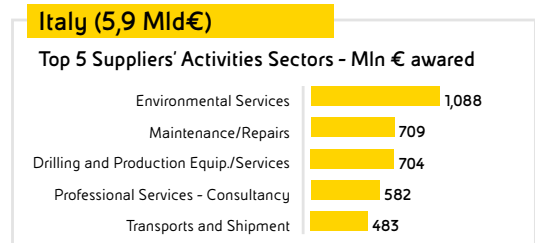
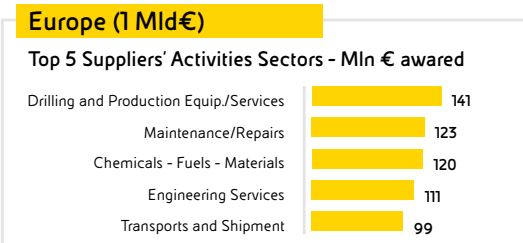
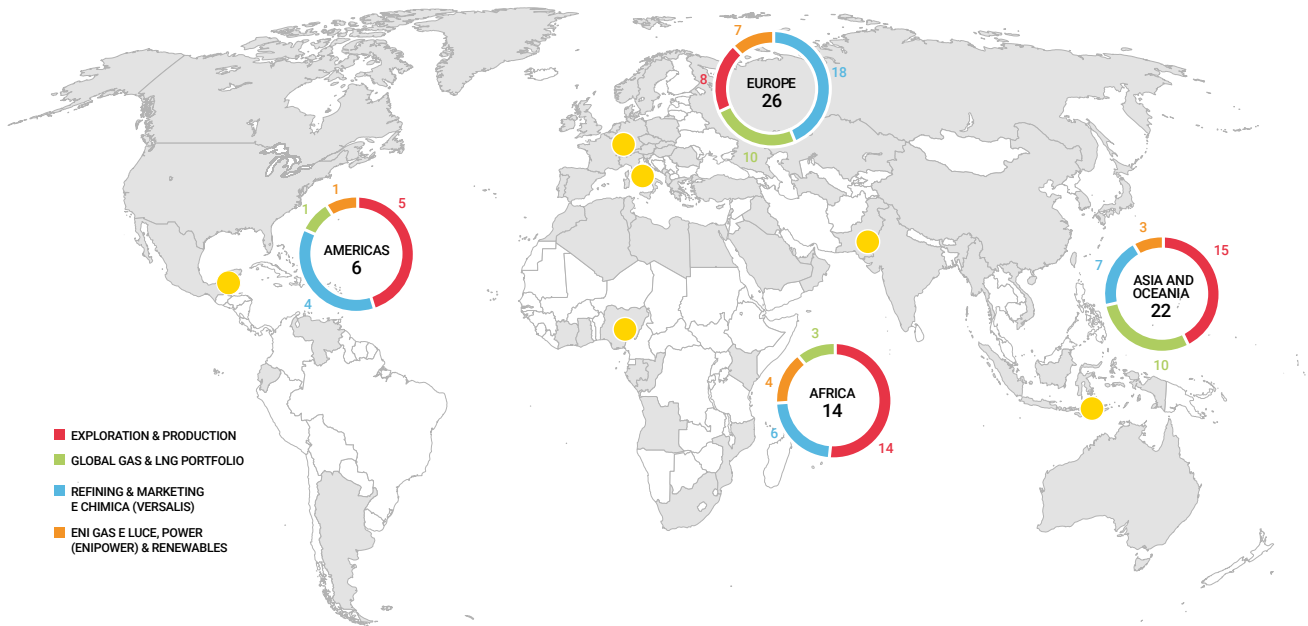
1. Any third party, non-employee providing products or services for Eni or any third party that acts on behalf of or for Eni's interest.

and geographical distribution of assets are Eni levers to strengthen its presence along the value chain. Eni employs more than 31,000 people in 68 Countries around the world. Eni's business and operating model is described in detail in the [Annual Report](#).

**Eni's supply chain**

Eni's operations are supported by a global supply chain that includes suppliers of goods, works and service from all over the world. The procurement expenditure in the Natural Resources, Energy Evolution and Support Function business areas was approximately of 11,8 billion € in 2020, with 19,700 contracts awarded by its 40 procurement departments around the world.

**Eni's activities**



**HUMAN RIGHTS POLICIES AND GOVERNANCE**

**Our Corporate Governance: focus on human rights**

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

On December 23<sup>rd</sup> 2020, Eni's Board of Directors decided to adopt the new Italian Corporate Governance Code 2020 which identifies "sustainable success" as the objective that must guide the action of the management body and which takes the form of creating long-term value for shareholders, taking into account the interests of other relevant stakeholders. The new Code is effective starting from January 1<sup>st</sup> 2021, however, Eni has been considering the interest of stakeholders other than shareholders as one of the necessary elements 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 most important internal ru-

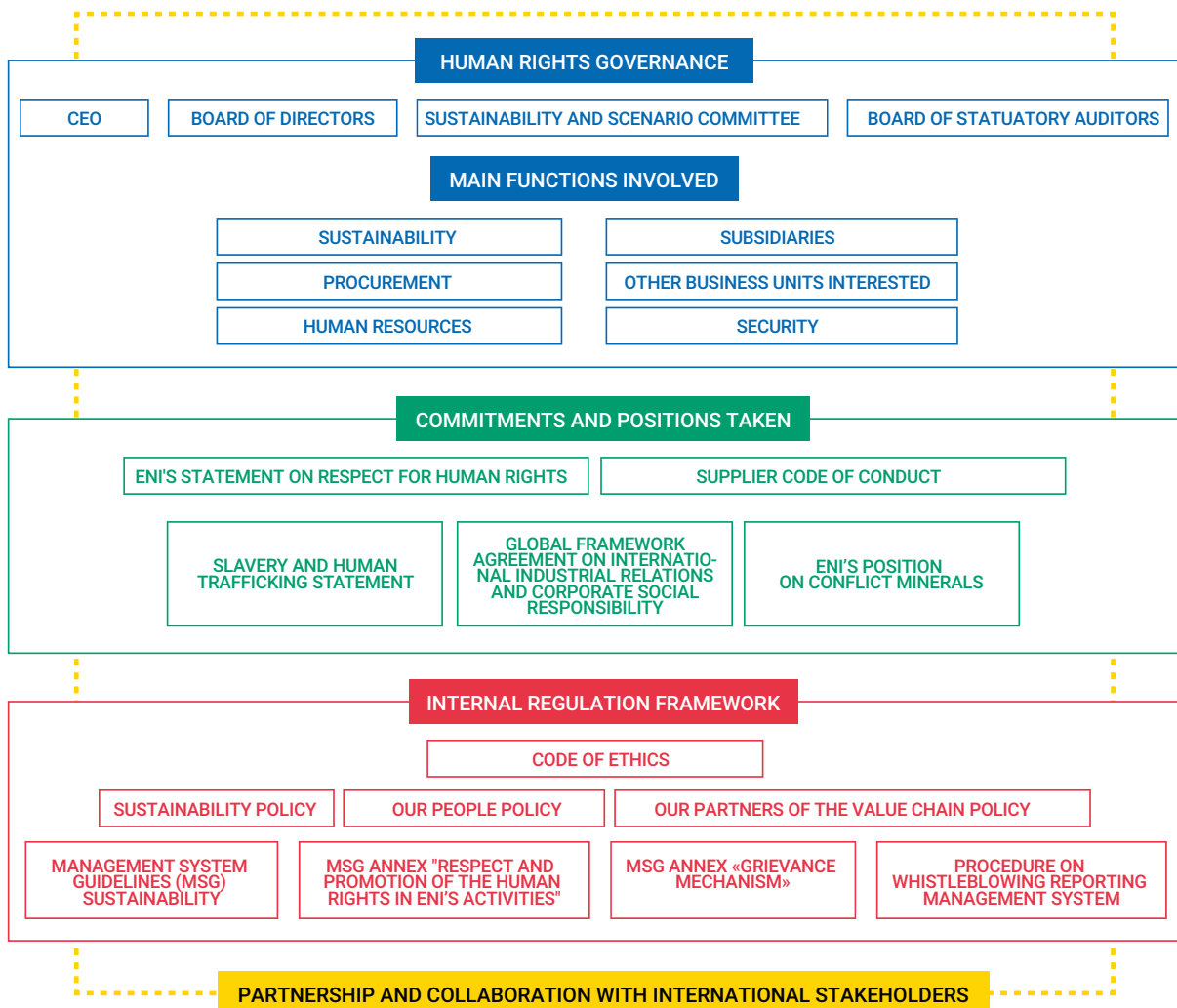
les, including the Code of Ethics, and the Eni's Statement on respect for human rights.

Further key 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.

With reference to Eni "top risks" - according to the Integrated Risk Management (IRM) model adopted - as well as main risks or issues otherwise detected during the IRM processes, 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) in order to support corporate decision-making process. Such results include human rights issues, even those related to supply chain, to the extent a potential violation is detected when assessing the above risks and measuring their impacts.

The Board of Directors is also responsible for defining the



risk profile, both in terms of nature and level of risks in a manner consistent with the company's strategic objectives – including all risks that could affect the medium-to-long-term sustainability of the business.

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 day-to-day overall 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 4 focus areas, each of them owned by a specific function. One of these focus areas is dedicated to the relationship with business partners along its 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**, in the **Eni's Statement on respect for human rights**, in the **Suppliers Code of Conduct**, in **"Our Sustainability"**, **"Our people"**, **"Our partners of the value chain"** and **"The integrity in our operations"** policies, referred to Eni's activities and supply chain.

The [Code of Ethics](#) sets out the main 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 provides for the refusal of all forms of forced and/or child labour and enunciates Eni's commitment to defining and disseminating policies, standards and rules that guide the action of its suppliers and partners towards the respect for 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 also inspires the model of organization, management and control. The Code of Ethics applies to all direct or indirect subsidiaries, both in Italy and abroad, and to all Eni's stakeholders. The Code was significantly updated on March 18<sup>th</sup> 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 both implementing 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 for instructions on how to assess 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 in March 2020. This document regulates internally how to perform human rights due diligence and provides a concrete approach to the commitment expressed in the Eni's Statement on respect for human rights.

Moreover, the [Global Framework Agreement](#) on International Industrial Relations and Corporate Social Responsibility (GFA), renewed by Eni, the IndustriALL<sup>2</sup> Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL<sup>3</sup> trade unions in June 2019 includes specific provisions regarding the international standards contract clauses must explicitly refer to, as well as requirements for qualifying suppliers and subcontractors. The Parties of the Agreement annually meet to share information on the implementation of the GFA and potential sustainability and human rights issues.

Finally, the [Suppliers Code of Conduct](#) set Eni's expectations from suppliers regarding compliance to internationally recognized 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, 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 Labor Organization - and the OECD Guidelines for Multinational Enterprises.

### HUMAN RIGHTS DUE DILIGENCE AND RISK ASSESSMENT

Eni's approach to human rights due diligence was established by the above-mentioned internal procedure "Respect and Promotion of the Human Rights in Eni's Activities", issued in March 2020 as part of the Management System Guidelines of Eni. 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.

The human rights due diligence model adopted by Eni, designed to be multidisciplinary, multilevel and integrated at any level of the company's processes, follows a risk-based approach with the aim of identifying, preventing, mitigating and accounting for adverse corporate impacts on human rights. The risks identified through the due diligence

2. Organization that represents more than 50 million workers distributed in 140 Countries, in the energy, manufacturing and mining sectors

3. Main Italian trade union organizations

are defined as risks to rights-holders, therefore 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 with the workforce management – direct and indirect (in supply chain), such as modern slavery and human trafficking, in line with the UNGPs.

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

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

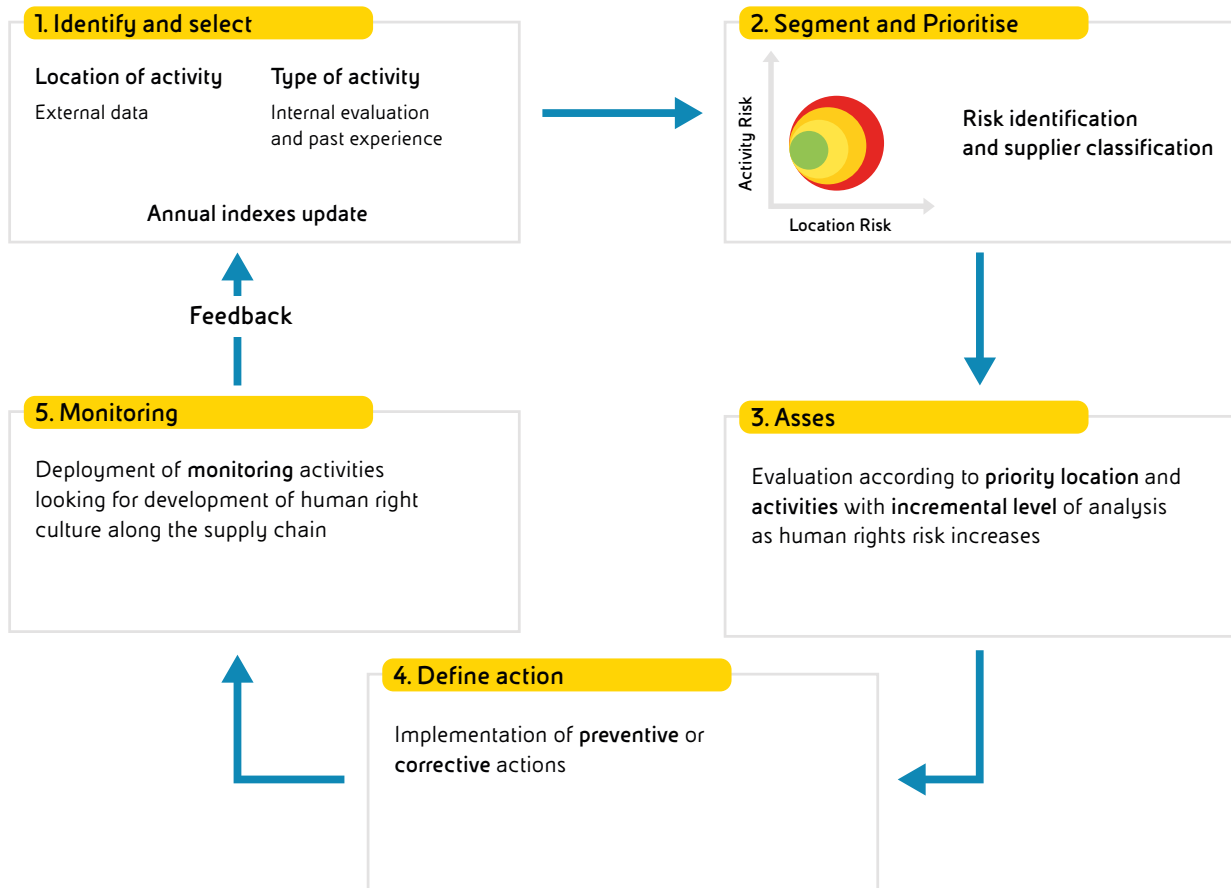
Eni is aware that in some Countries of operations there are relevant context risks related to human rights violation, included modern slavery. Conscious of this, Eni has in place an articulated framework of policies, management models, contractual clauses and practices adopted by Eni’s subsidiaries - in line with the commitments undertaken by the parent company in the Code of Ethics and in the Eni’s Statement for the respect of human rights – which allows to effectively manage these risks in direct workforce management.

In addition, in 2020 a pilot application of a new risk evaluation model was carried out on some of the Group’s subsidiaries. This risk-based model aimed at segmenting Eni’s subsidiaries on the basis of specific quantitative and qualitative parameters that capture the characteristics and risks of the operating context (Country in which the subsidiary is based) and related to the human resources management process, including the fight against all forms of discrimination, gender equality, working conditions, freedom of association and collective bargaining. The application of the model allows the company to identify any areas of risk as well as their evaluation in order to define specific actions to be monitored over time. In 2021, the model will be extended to the other subsidiaries thus allowing a broader clustering of human rights risk in the workplace.

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

In 2020 Eni has implemented a new risk-based model for assessing and managing the human rights risk along the supply chain: suppliers are monitored and assessed in order to promote and guarantee the respect of human rights by excluding any form of slavery, forced labour, child labour and encourage healthy and safe working conditions, freedom of association, and adequate wages. Through the model adopted, the risk evaluation is based on an objective and transparent methodology which leads

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



to a suppliers’ classification according to potential risk of human rights violations. Such risk is evaluated taking into account the Country of operations and type of activity performed.

The geographical risk derives from external data providers and it is based on the evaluation of the occurrence probability of human rights violation in terms of forced labour, trafficking in persons and modern slavery also considering the legal and regulatory frameworks, government effectiveness and law enforcement. The risk associated to a specific activity, originated by internal evaluations, is based on the vulnerability and probability of incidence of non-compliance with human rights in working conditions such as level of workers, labour intensive work, percentage of low-skilled manpower required, HSE standards required.

On the basis of evaluations performed, the suppliers at risk were identified in all business sectors of Eni, from industrial activities (such as maintenance, construction, assembly, logistics) to general goods and services (such as cleaning services, catering, building management security services).

To manage these risks, the model allows differentiated control approaches according to the different risk levels, always inspired by international standards such as SA8000: all suppliers are evaluated on respecting human rights with a growing level of detail according to the associated risk degree. Through the acceptance of the Code of Conduct, suppliers are required to comply with Eni’s principles and policies on human rights in order to become or maintain the status of Eni’s supplier. Moreover, all suppliers are subject to a continuous monitoring process through due diligence verifications and enforced feedback processes with focus analysis on respecting human rights and periodic check-points with dedicated questionnaires - during the qualification stage - and on field-surveys - during the execution of the contract. In the tender evaluation process, as the human rights risk increases, minimum requirements are adopted, evalua-

ted and monitored along the contract duration not only for contractors but also for Eni’s subcontractors with the aim of preventing any forms of modern slavery such as forced labour, child labour, discrimination or unequal wages. According to the risk based model, evaluation and monitoring of suppliers performance in terms of respect for human rights can be carried out with on-site audits or, when it is not possible, by a virtual audit.

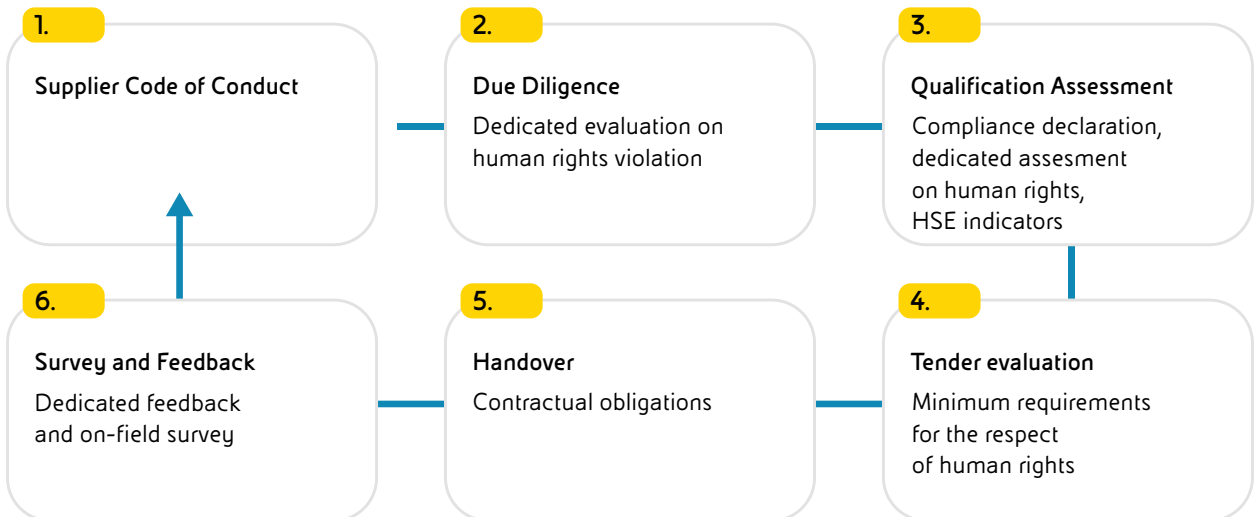
The result is a comprehensive approach for risk identification, prevention, and mitigation in every stage of the procurement process, from the supplier selection to the tender evaluation and performance monitoring along the entire supply chain.

As part of continuous evaluations of suppliers on social and environmental sustainability issues (5,655 suppliers evaluated in 2020), Eni has reached the target of 3,403 suppliers specifically assessed on the respect of human rights with a dedicated questionnaire during the qualification process. In contract execution phase, almost 2,190 feedback questionnaires have been evaluated and 97 cases have been identified to be analysed in depth. The in-depth assessment revealed that **none of them were related to modern slavery issues**.

In addition to what stated above, in 2020 Eni, in collaboration with the Boston Consulting Group and Google Cloud, has promoted the development of [Open-es](#), a new digital platform open to all players to pool data, best practices and sustainability models throughout the value chain. All suppliers will be requested to collaborate, self-evaluate and improve themselves according to the four dimensions of Stakeholder Capitalism Metrics (people, prosperity, principle of governance and planet) with a specific focus on respect of human rights.

Open-es is also an important enabler for [JUST](#) Programme (Join Us in a Sustainable Transition – enforced and implemented in 2020), the Eni’s program created with the aim of involving suppliers in Eni’s energy transition, respecting the values of sustainability, human rights and circular economy in line with Eni’s mission. Thanks to the JUST

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



programme, Eni encourages suppliers to enhance their performance in terms of environmental protection, economic development and social growth, through the adoption of ESG elements at every stage of the procurement process, from qualification to tender phases.

#### **Assessing and managing risks with other business partners**

Eni's efforts to manage slavery risks include using "responsible contracting" to encourage its business partners to comply with internationally recognised human rights principles and to mitigate any potential risk of Eni being – even indirectly – involved in human rights violations. To ensure responsible contracting across Eni's supply chain and its other business relationships, the Sustainability and Compliance Functions are working together to:

- (a) identify key indicators of potential human rights risks inherent in Eni's main contractual relationships with a view to developing standard human rights clauses to be inserted in these contracts. Such standard clauses will be included in an internal policy binding on all Group companies;
- (b) insert on an ad-hoc basis appropriate human rights and anti-slavery clauses in contracts deemed at potential risk of human rights violations.

In these human rights clauses Eni requests – among others – that any entity with whom Eni or its subsidiaries enter into business relations takes note of the Eni's Statement on Respect for Human Rights and, itself respects human rights, including workers' rights as enshrined in the principle ILO Conventions and the prohibition of forced labour, trafficking and slavery, in the conduct of its business and in the execution of the contract activities.

#### **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 new risk-model implemented in 2020. The assessment allows to identify possible negative impacts and address them: the "Security & Human Rights" action plan was set according to the results of the risk assessment and it included, among other, actions like sampling the supervisory contracts in place in the first 10 Countries resulting from the risk-based model, in order to verify the presence of human rights clauses, and the realization of the training and information workshop on "Security & Human Rights" in Angola.

#### **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 Eni's efforts to prevent human rights violations, also in terms of modern slavery practices. In 2020, relevant KPIs related to staff training, suppliers' assessments, criticalities and eventual human rights

violations, as well as whistleblowing events have been monitored in continuity with the previous years and drive Eni's actions to improve. Data and figures about the performance are available in the 2020 Annual Report, in the Sustainability Report "Eni For a Just Transition 2020" and in the Report "Eni For Human Rights".

The monitoring of these KPIs drives Eni's actions to improve and allows to set annually specific targets, which are embedded in the objectives assigned to the management in charge of the processes more at risk in terms of human rights impacts. 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 plays a relevant role to assess the effectiveness of the internal regulations and their application to human rights.

Periodically, at least once a year, the approach towards modern slavery and, more in general, 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 to be a key element of its commitment to respecting human rights. Eni wants to ensure that every employee is aware of the importance that the Company places on human rights. Over the last years, Eni has developed a wide range of training courses on business and human rights, differing in terms of format and content, in order to offer Eni's employees and business partners the learning opportunities that best suit their needs.

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

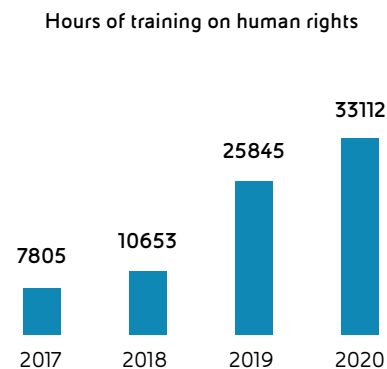
1. General courses on business and human rights for all Eni people
2. Specific courses on topics and areas particularly exposed to risks of negative impacts
3. Training initiatives on issues closely linked with human rights (e.g. Code of Ethics, HSE, etc.)
4. Training courses on security and human rights

This year, more than 33,000 hours of training were delivered to staff and middle and top managers on human rights program.

In 2019 was launched a specific training module on human rights risks along the supply chain for the Eni's procurement professionals, that has been progressively extended in 2020. 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 passports retentions. Both case studies terminate with a description of Eni's expectations in terms of both remedy for abused workers and approach with the suppliers. Another initiative concerning the services providers is



the Training Program on Human Rights and Security, which has been delivered to public security forces and security specialists.



The above-mentioned Program has been running since 2009 with the participation of security provider, in Italy and globally, and will continue to involve Countries in which Eni operates. Training sessions have been held in 14 Countries in last 11 years.

## 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 full confidence and without fear of retaliation. All the whistleblowing reports received are fully 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>4</sup>. **As per 2020, no reports on modern slavery were received and confirmed.**

Moreover, an operational-level **Grievance Mechanisms** is defined based on a proactive and structured approach to receive, recognize, investigate, respond and resolve complaints from individuals or groups of individuals in a timely, planned and respectful manner. The Grievance Mechanism allows to manage risks and foster a positive relationship with stakeholders, as well as provide remediation in case of non-compliance. Details are available in "Eni For Human Rights".

## MULTI-STAKEHOLDER INITIATIVES

Engagement with representatives of rights-holders is an essential activity of 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 key 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 relating to human rights issues (if any) and positive actions in favor of non-discrimination.

Furthermore, Eni builds long-term relationships with renowned human rights experts and organizations in order 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.

The Annual Plenary Meeting 2020 of the Voluntary Principles Initiative (VPI), a multi-stakeholder initiative dedicated to ensuring human rights in security operations, has unanimously approved Eni's admission as an "Engaged Corporate Participant". Eni's membership of the VPI further strengthens the company's commitment to working with institutions to affirm respect for fundamental human rights principles in managing the required security operations.

Moreover, Eni is an active member of the IPIECA's<sup>5</sup> Human Rights Working Group (HWG) and Supply Chain Working Group (SCWG), where most relevant issues for the industry are discussed and guidance are elaborated. In 2020, IPIECA and the oil and gas contractor members of Building Responsibly began working together to build awareness and improve the management of labour rights issues in the oil and gas industry supply chain, focused on the risks associated with the construction of large projects in sensitive geographies with vulnerable workers, through the development of training materials for member employees and their contractor/subcontractor staff.

Finally, Eni is LEAD a member of the UN Global Compact, and the World Business Council for Sustainable Development.

## CONSULTATION

Eni's organizational and business structure is highly integrated in terms of its policies and processes, which stem from Eni S.p.A. and are applied across the Eni Group. All Eni Group subsidiaries, including but not limited to those falling within the scope of application of the relevant slavery statement laws, adopt Eni's main 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, Integrated Risk Management, Human Resources, Govern-

4. [www.eni.com/en-IT/about-us/governance/notifications.html](http://www.eni.com/en-IT/about-us/governance/notifications.html)

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

nance, Security, Eni Corporate University (ECU). Each of these units and departments was involved – under the lead of the Sustainability Function – in the preparation and drafting of this Statement to ensure that the document reflects accurate and updated information. Moreover, the human rights due diligence model adopted by Eni S.p.A. 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 Negotiations and the subsidiaries, to include standard human rights clauses in Joint Operating Agreements and Petroleum Contracts, which require among other things that all Parties to such agreements avoid/prevent child labour, forced labour and slavery practices as well as ensure decent work conditions and labour rights.

#### THE COVID-19 PANDEMIC

Eni has provided immediate support to frontline workers managing the COVID-19 health emergency, drawing upon wide-ranging experience gained in the past in the management of epidemics such as Sars-Cov-1 and Ebola and thanks to the regulatory, organizational and operational tools that had already adopted since 2011 to be prepared in the management of epidemic and pandemic events<sup>6</sup>.

#### MOVING AHEAD

In 2021 Eni will take further important steps to spread and consolidate a culture of respect for human rights, by implementing the new risk based human rights model in the supply chain, starting to apply it in Italy and then progressively applying it to all its subsidiaries abroad, as well as the model to assessing and managing risks related to Eni’s direct workforce.

Eni’s training plan will be implemented to continue promoting shared knowledge on human rights and creating a common language on the issue at company level, especially in those departments and business areas playing a key role in managing the respect for human rights. Due to the new risk models adopted, specific training and awareness activities will be provided to all procurement professionals worldwide to spread the human rights model. An internal procedure will also be adopted to define new standard human rights clauses to be applied in all contracts signed by Eni.

6. For more information about Eni’s commitment during the pandemic and the actions taken see Eni for a Just Transition and the following webpages: <https://www.eni.com/en-IT/media/a-challenge-we-must-overcome-together/covid-abroad.html>; <https://www.eni.com/en-IT/media/a-challenge-we-must-overcome-together.html>;

This statement refers to Eni Group<sup>7</sup> (herein referred to as “Eni”, “it”, or “its”) in accordance with 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 during 2020 to prevent slavery and human trafficking in its supply chain or in any part of its own business<sup>8</sup>.

| <b>UK Modern Slavery Act (2015)<br/>– recommended criteria</b>   | <b>Australian Modern Slavery Act<br/>(2018) – mandatory criteria</b>  | <b>Eni’s Slavery<br/>and Human Trafficking Statement</b>  |
|--|---|---|
| Organisation’s structure, its business and its supply chains.  | Identify the reporting entity. Describe the reporting entity’s structure, operations and supply chains.   | Eni’s business and supply chain.  |
| 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 of those reporting entities owns or controls. | Human rights due diligence and risk management.   |
| Organisation’s policies in relation to slavery and human trafficking; its due diligence processes in relation to 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.                 | Human rights policies and governance<br>Human rights due diligence and risk management<br>Training and awareness<br>Whistleblowing and grievance mechanisms |
| Organisation’s effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.  | Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks.   | Assessing effectiveness   |
|  | Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls.  | Consultation  |
|  | Any other relevant information.   | The COVID-19 pandemic<br>Moving Ahead   |

This Statement has been approved by the Board of Directors of Eni S.p.A., April 29<sup>th</sup> 2021.



Claudio Descazzi  
CEO Eni SpA

Date: 29<sup>th</sup> April 2021

7. Eni Group refers to the parent company Eni S.p.A. and its consolidated subsidiaries as identified in the Annual Report

8. 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.

## **Annex A**

### **LIST OF ENTITIES FALLING WITHIN THE SCOPE OF APPLICATION OF THE UK MODERN SLAVERY ACT 2015 AND AUSTRALIA MODERN SLAVERY ACT 2018:**

*Versalis S.p.A.; Versalis UK Ltd.; Versalis International SA (branch UK); Eni Trading and Shipping S.p.A. (in liquidation since January 1st 2021); Eni International B.V.; EniProgetti S.p.A.; Eni International Resources Ltd; Eni UK Holding Plc; Eni UK Limited; Eni JPDA 03-13 Limited; Eni Australia BV; Burren Energy (Egypt) Limited; Burren Energy India Limited; Burren Energy Plc; Eni AEP Limited; 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 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 Sea Wind Limited; Eni North Ganai Limited; Eni Oil Algeria Limited; Eni Pakistan 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.*