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ENI S.p.A.

**ANNUAL REPORT ON
VOLUNTARY PRINCIPLES ON SECURITY
AND HUMAN RIGHTS 2023**

Eni SpA

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Contents

Introduction

(A) Commitment to the Voluntary Principles

Public Statement of commitment or endorsement of the Voluntary Principles, engagement in the Voluntary Principles Initiative, and transparency

Examples of promoting and advancing implementation of the VPs internationally

(B) Policies, procedures and Related Activities

Relevant policies, procedures, and/or guidelines (or any changes thereto from the previous reporting year) to implement the Voluntary Principles

Risk Assessment

Company procedure to conduct security and human rights risk assessment and integrate findings

Engagement with Security Forces

Company procedure or mechanism to report security-related incidents with human rights implications by public/private security forces relating to the company's activities

Company procedure or mechanism to investigate and remediate security-related incidents with human rights implications by public/private security forces relating to the company's activities



(C) Country implementation

Overview of country operations selected for reporting

Engagements with stakeholders on Country implementation

Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as arrangement with public security forces

Examples of supporting outreach, education, and or training of i) relevant personnel, ii) private security, iii) public security and/or civil society (e.g. local NGOs, community groups)

(D) Lessons and Issues

Lessons or issues from this reporting year, as well as plans or opportunities to advance the VPs for the organization



Introduction

“We need to build a resilient hu-man rights system and each of us is called to play its part. As Eni, we strongly feel this impera-tive and we concretely support a just transition focusing on workers, suppliers, communities and customers to create a responsible, shared and widespread human rights culture together with our stakeholders”.

Claudio Descalzi, CEO of Eni



Eni's vision on Human Rights is based on the respect of the dignity of every human being and on companies' responsibility to contribute to the well-being of individuals.

It is a continuous improvement process, where everyone at Eni is called to walk the talk the system of methodologies and rules that allow respect for human rights.

Each year this commitment is confirmed and strengthened and each event is the occasion to highlight this stance towards the Human Rights.

This report strives to depict the achievements Eni obtained in 2023 with activities and projects to implement the Voluntary Principles on Security and Human Rights.



A. Commitment to the Voluntary Principles

Public statement of commitment or endorsement of the Voluntary Principles, engagement in the Voluntary Principles Initiative, and transparency

Public statement of commitment or endorsement of the Voluntary Principles

Eni's commitment to respect for human rights within the security activities is ensured through a security risk management system which is structured and implemented in line with the Voluntary Principles on Security and Human Rights regulations and the highest international standards on human rights. This commitment is integrated in several of Eni's key documents.

Eni Code of Ethics¹ is the tenet in the Human Rights regulatory framework and describes Eni's value system and its commitment to respect people's rights, also through the adoption of rights-holders' perspective. It sets out the central values that guide Eni's actions and contains effective rules of behavior so that the principles contained therein form a practical guide for corporate operations. As set out in its Code of Ethics, Eni is committed to ensuring a work environment that is free from any form of discrimination or abuse and to establishing work relations that are characterized by fairness, equality, non-discrimination, focus and respect for the dignity of the individual. The Code of Ethics also refers to the compliance with Voluntary Principles on Security and Human Rights within the first commitments of the document and refers to the respect for human rights in the adoption of security measures.

A specific commitment in the Eni Code of Ethics refers to the provision of a whistleblowing process with transparent information on the process and guarantee of confidentiality and non-retaliation. To make sure Eni supports people in correctly and effectively understanding the contents of the Code,

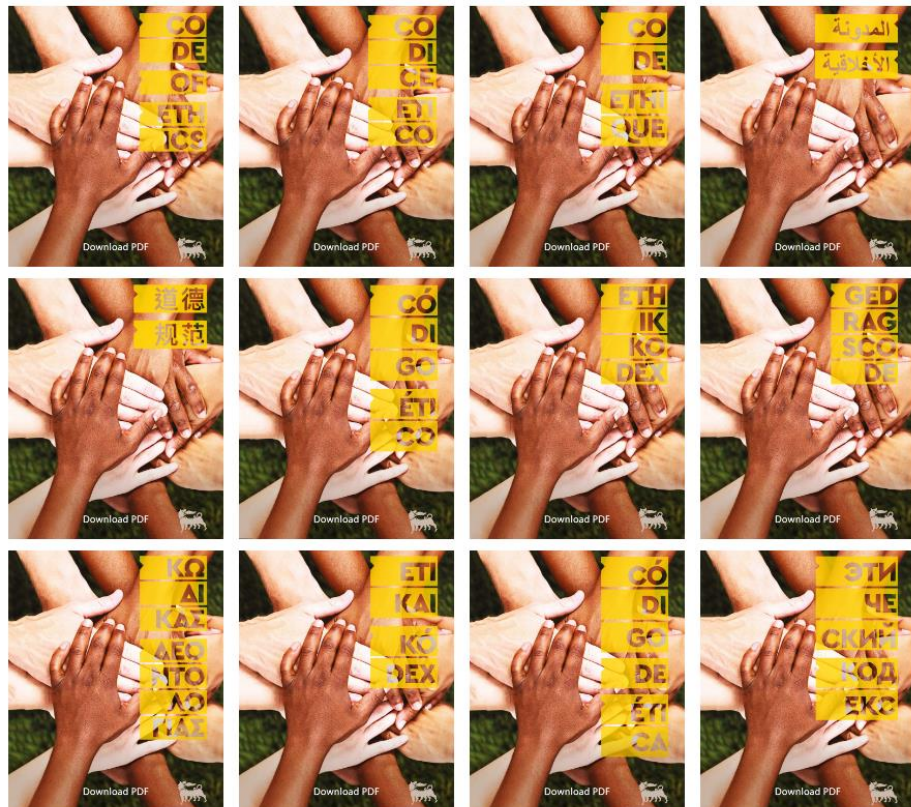
¹https://myeni.eni.com/en_IT/being_Eni/organization/code_of_ethics_new_eng.html;



the Eni Code of Ethics mailbox has been opened, through which clarification on the content of the Code can be sought. This does not affect the reporting of potential breaches, which continues to be dealt with through the Whistleblowing reports channel (see below). To disseminate its content a **training program** is developed and broadcasted among all Eni's employees and it is mandatory for all of them, and to help all Eni's people to fully understand this paramount document, the Code of Ethics is available in **12 languages**.

Download the Code of Ethics in 12 languages

Click on the covers to download the pdfs.



Creator: Internal Communications

Last Update: 31 January 2024



Besides, a specific online app named “**EticApp**” has been created. The Code of Ethics app is a communication and work channel that enables the spread of useful information about Code of Ethics to all of Eni’s employees.

The app dedicated to Eni Code of Ethics is available online, but downloadable from the Eni Store on any mobile phone (corporate and personal).

The Code also provides for **mechanisms for reporting potential breaches**. In fact, it contains rules for its application, starting with the Code recipients and their responsibilities, through mechanisms for reporting potential breaches. Anyone can send or transmit, even anonymously or in confidence, Whistleblowing reports, concerning behaviour in violation of the Code of Ethics that may cause damage or prejudice to Eni, even if only to its public image.

Senior Management are the main supporters and testimonials of Eni Code of Ethics by means of videos and statements.

The key document where the terms of Eni’s commitment are set out is the new Policy. In September 2023, Eni’s Board of Directors approved the new Policy “Respect for Human Rights in Eni”, which renews the company’s commitment in this area and lays a foundation for updating and strengthening the company’s management model, aiming at guaranteeing the implementation of the due diligence process regarding human rights according to the UN Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises, also considering future European regulatory developments in this regard.²

Eni’s policy highlights: the respect for internally recognized human rights in its own activities and those of its commercial partners, in line with the UNGP and OECD Guidelines for Multinational Enterprises; the conduction of the human right due diligence in its activities to assess potential and actual impacts, and improve prevention and mitigation of such impacts; the respect of people and communities by recognizing and enhancing their culture, lifestyles, institutions, ties with the land of origin and development

² <https://www.eni.com/content/dam/enicom/documents/eng/sustainability/2023/Policy-ECG-Respect-for-Human-Rights-in-Eni.pdf>;



models in line with international standards; the work with the third parties on the prevention and mitigation of any human rights adverse impact; the provision of access to remedy, including through cooperation with their parties, in case of adverse impact it might have caused.

The specific areas of commitments are based on the Salient issues and in alignment with the prioritization approach defined by the UN Guiding Principles and the OCED Guidelines.

With reference to security activities, the Policy refers to the implementation of a security risk management system in compliance with regulations, Human Rights and the highest international standards (UN Voluntary Principles on Security and Human Rights and Basic Principles on the Use of Force and Firearms by Law Enforcement Officials), which also takes into account the specific needs of the countries where it operates. Those principles are communicated to all security personnel protecting Eni people and facilities and promoted through the inclusion of Human Rights clauses in the Memorandum of Understanding it signs with local authorities and in contracts that supply security and concierge services at its premises in Italy and abroad.

Furthermore, as a major operator in several countries, Eni is committed to actively cooperating with State Authorities and Government Entities in the implementation of Human Rights programs and to contribute, by respecting human rights in its activities and relations, to fostering respect for Human Rights, including by enhancing collective awareness on the importance of these principles, and to express its concern about any Human Rights issues that may arise in countries where it operates.

Another area of commitment considered of pivotal importance is Diversity & Inclusion, with a focus on the enhancement of the diversity of people, whose cultural contribution enriches Eni's identity.

Eni's approach to Diversity & Inclusion (D&I) is based on the fundamental principles of non-discrimination, equal opportunities and inclusion of all forms of diversity, as well as the integration and balance of work with the personal and family needs of Eni's people. Eni's focus on an inclusive culture



is stated in the corporate mission, in the regulatory framework and in many company documents. On November 28, 2023, Eni's first D&I Policy was issued, which is part of the Ethics, Compliance and Governance (ECG) Policy of Eni's new regulatory system. The D&I Policy, the basic outline of which was approved by the Board of Directors on October 26, 2023, includes the D&I model, reference principles and commitments undertaken by Eni in its activities in Italy and abroad.

Eni's human rights commitments is also included in the "Zero Tolerance against violence and harassment in the workplace" regulatory instrument, which was issued in 2021, and subsequently (in 2023) issued as Policy, consistent with the overall evolution of Eni's regulatory system. The Zero Tolerance policy, in accordance with the principles of the Geneva Convention of the International Labour Organization, 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 violence and harassment of any form, where we can all feel protected and free to express ourselves. Furthermore, note that the regulatory instrument adopted by Eni against violence and harassment at work received an award at the LC Sustainability Awards 2022 as an expression of Eni's forward-looking and ambitious approach to ethics and compliance.

In the **Security Management System Guideline** Human Rights and Security are strictly related. Furthermore, the pivotal role of the Voluntary Principles Initiative in Eni's stance on Human Rights and the compliance to the Voluntary Principles on Security and Human Rights are clearly stated.

In the Security MSG the attention to ensuring that human rights are always respected is strongly confirmed.

"In particular, recognizing that the security and protection of people and corporate assets are fundamental needs to be reconciled with the need to respect human rights, Eni adopts and recalls - also in relations with both public and private security forces - the "Voluntary Principles on Security and Human Rights" (VPSHR), a collection of principles drawn up by the Voluntary Principles Initiative to offer oil and mining companies a valid practical



reference for balancing security needs with those relating to respect for and protection of human rights”.

Also the training on Human Rights is provided for in the **Management System Guideline** along with the VPSHRs implementation.

“With the aim of fostering respect for human rights and the implementation of VPSHRs, the central Security function, in liaison with the competent Eni functions, promotes, designs and implements training initiatives on human rights & security, addressed both to the professional security family and to public and private Security Forces carrying out their activities at Eni sites”. The primary objective of these training activities is to raise awareness and promote respect for human rights, especially in contexts where there are critical issues on the subject.

Among others company documents, Eni’s commitment on Voluntary Principles is also included within the **Eni’s Supplier Code of Conduct**, adopted in 2020, which sets specific expectations on respect for human rights and represents a key reference for all suppliers and business partners in the relations with Eni. It establishes the mutual commitment to recognize and protect the value of all the people, commitment to contrasting climate change and their effects, operating with integrity, protecting company resources, promoting the adoption of these principles within their own people and supply chain. Among these principles, regarding human rights and work, the reference is the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, but also to the United Nations Guiding Principles on Business and Human Rights (UNGPR), the OECD Guidelines for Multinational Enterprises and Voluntary Principles on Security & Human Rights. All suppliers will be asked to sign the Code and to promote the principles contained in it along their supply chain.

These commitments are also embedded in Eni’s annual reports, such as **“The Consolidated Disclosure of Non-Financial Information”**, **“Eni For”** and **“Eni for Human Rights”**. The latter represents a dedicated report on Eni’s activities and performances on human rights.



In each of these documents there are clear references to the Voluntary Principles on Security and Human Rights, their explanation and the description of the activities carried out by Eni to implement them during the year.

In “**The Consolidated Disclosure of Non-Financial Information**” Human Rights-related Key Performance Indicators are illustrated.

The first KPI is about **the percentage of Security Professional Area members trained on Human Rights** over the years. Each year, due to a pretty high turn-over in personnel, the amount of Human Rights-trained resources may change significantly. The great challenge is to communicate to every new entry in the Security Professional Area the importance of being trained on Human Rights values. This process is carried out for all the personnel working for the Professional Area, even if they are not fully dedicated to Security activities.

The second KPI is about **the number of Security Forces trained on Human Rights** in the current year. It sums up all the Security Forces that joined Security and Human Rights Workshops; until 2023 Eni organized one or two events of this kind; starting from 2024, Security Dept. launches a new project, the so called “**In-Country Workshops**”, involving more workshops set up by local Security Managers and Security Officers in Subsidiaries where Human Rights are most at risk. Compared to the “classic” Workshop, characterized by great effort in organization and guests’ affluence, In-Country Workshops would be more operative and training-oriented with no or limited guests. This project would enable to extend the number of Security Forces trained on Human Rights and it would allow to reach Countries, security forces and local people at a deeper level. The In-Country Workshop project would flank the current workshop process.

The third KPI monitors the **percentage of Security contracts equipped with a provision on Human Rights protection**. This indicator measures the contracts provision coverage and in 2023 it reached 100% of contracts.

Eni Security Dept. commits to conduct these KPIs, improving them as much as possible.

Keeping a focus to the international legal framework and in compliance with the British regulation (Modern Slavery Act 2015) and the Australian



regulation (Modern Slavery Act 2018), another fundamental Eni’s public document that expressly refers to the Voluntary Principles is “**Eni Slavery and Human Trafficking Statement 2023**”, a document on the activities carried out by Eni to contrast any form of modern slavery in the business activities and in the supply chain. This regulation is updated every year. In the 2023 version there is a paragraph dedicated to “Assessing and managing risks with security providers” on risk-based model and the clusters it is split into.

Another action is focused on the Multi-stakeholder Initiatives and describes the activities Eni carried out in 2023: the drafting of the Annual Report. Other examples of the engagement in the Voluntary Principles Initiative are the organization and application for the VPI of the “**Conflict Analysis Tool in Mozambique**” and the development of a three-day **training program on security and human rights in Iraq**, in November 2023, addressed to field level and command security personnel.

In addition, Eni published its commitments on human rights and on Voluntary Principles on Security and Human Rights on its website, where a direct link to the Principles is provided³.

Describe senior management’s understanding of and commitment to the Voluntary Principles

The commitment of the senior management’s to the Voluntary Principles was confirmed in 2023 **Workshop on Security & Human Rights, held in Basra, Iraq**. In front of a great range of stakeholders (Members of Parliament, Basra Governor, FAO and UNICEF representatives, Military and Police Officials, journalists and civil society advocates) the value for Eni of the Voluntary Principles on Security and Human Rights was strenuously reaffirmed by Eni Iraq B.V. Managing Director and by Eni Zubair Field Operating Division General Manager. The Head of Eni Global Security also said: “*Talking about Human Rights and how Security can impact them is proof that awareness of these issues is high and that we want to deepen*”

³ <https://www.eni.com/en-IT/just-transition/respect-for-human-rights.html>



them through an outside provider to guide us on a path we will take together”.

Eni’s management was involved in the process of the new ECG Policy on Respect of Human Rights and the document was formally approved by the Board of Directors (BoD) and included within the normative system of the company; in addition, Eni’s Board of Directors took part to an in-depth session on the international scenarios and challenges on human rights and business held by the International Human Rights and Business (IHRB). This session was held during the annual meeting of Sustainability and Scenario Committee (SSC) where the main updates to the human rights management system and activities conducted during the year are presented to the Directors.

Activities on human Rights and security are therefore included within the issues discussed within the Sustainability and Scenarios Committee (SSC). In performing its sustainability duties, the BoD has been indeed supported, since 2014, by the Sustainability and Scenarios Committee (SSC), which provides information, makes proposals, and provides advice on scenarios and sustainability, with a particular focus on the protection of rights, in the personal contribution that individual Directors in supporting the Board. The Committee provides for proposals and advice to the Board of Directors on scenarios and sustainability and delves further into the integration between strategy, evolutionary scenarios and business sustainability in medium-long term.

SCC and BoD are also involved in the annual approval of the Slavery and Human Trafficking Statement, drafted in compliance with the Australian and British “Modern Slavery Act”. Eni’s management commitment to Voluntary Principles and human rights is further strengthened and supported by the management objectives.

The Management Objectives are directly linked to the implementation of the Company’s human rights policy commitment and to the Eni’s salient human rights issues synthesized in 4 clusters: human rights (i) in the workplace, (ii) in the communities, (iii) in the supply chain and (iv) in security operations.



Eni Managers working in Departments which carry out activities that may impact human rights have indeed objectives linked to the integration of the human rights perspective in their analyses and activities, together with operational and economic-financial targets. These objectives can be assigned to Managers with various degrees of responsibility (i.e. Directors, Vice Presidents, Global Heads or Managing Directors, Commercial Managers of Eni subsidiaries, etc.), including those reporting directly to the CEO. In 2023, Eni continued awarding management incentives associated with human rights performance and Human Rights-related objectives, including the activities carried out to implement the Voluntary Principles, have been assigned to Eni's management working in Security Department. In particular, the set-up of the Workshop on Security & Human Rights we mentioned above in a Subsidiary most at risk of human rights violation and the Conflict Analysis Tool implementation launch were goals embedded in 2023 Security Senior Managers Objects.

These Management Objectives linked to human rights targets are reviewed annually according to the Action Plan on human rights and the issues emerging from the due diligence.

Implementation of human rights and security commitments is well structured within the company and improved every year. As for the Global Head of Security, the 2023 human rights management objective was to supervise Security activities guaranteeing Human Rights promotion coherently with Human Rights management model provided for in "Human Rights" Annex in MSG (Management System Guideline) Responsible and Sustainable Enterprise, Eni's internal regulation on human rights due diligence. Also, the organization of the Workshop on Security & Human Rights in a Subsidiary (Eni Iraq BV - Iraq) and the start of the implementation process of Conflict Analysis Tool in a Subsidiary (Eni Rovuma Basin - Mozambique) were actions part of the Objective. All these actions were completed.

Finally, Eni is currently undertaking a process of update of its salient issues (where human rights and security activities is included) that involves the Eni's management across the different departments in the analysis and



review of main potential risks of business activities, with the aim of update and reinforce all human rights due diligence system.

Engagement in the VPI

In 2023 Eni focused on all the actions bound to shore up VPI engagement: Conflict Analysis Tool implementation, Security & Human Rights Workshop set-up, joining VPI meetings - mostly the Annual Plenary Meeting held in London on May 2023 - and conceiving new ways to disseminate VPSHR awareness as well.

The latter involved the draft of a new project that would be launched in 2024: **In-Country Workshops on Security & Human Rights**, a kind of Workshop where local Security Managers play a major role undertaking a lean version of the annual Workshop on Security & Human Rights.

Starting from the beginning of 2023, the main task was to draft a thoroughly new Conflict Analysis Tool in a different Country in respect of the 2022 Conflict Analysis Tool.

The set-up of the **Workshop on Security & Human Rights** was hugely demanding for the number of guests (Members of Parliament, FAO, UNESCO and UNICEF representatives, High Public Officers, local Mayors) and observers and media (journalists, tv, radio).

The development of a three-day training programme on security and human rights in Iraq, in November 2023, addressed to field level and command security personnel. The first day consisted of a security and human rights workshop, with more than 150 attendees. Decision-makers, politicians, civilian and military/police authorities and Eni's management attended the workshop: Italian Ambassador in Iraq, three Members of Parliament of Federal Iraqi State and belonging respectively to Human Rights, Integrity and Oil&Gas Committee, Basra Region Governor, all South Iraq military top ranks, Inner Minister representatives, local Mayors and local tribes' leaders and international entities representatives (UNESCO, UNICEF, FAO).

The second and third days consisted of security and human rights training for Public and Private Security Forces, with more than 180 participants altogether. The training was conducted in Arabic, with an English translation, by an experienced external provider, who has extensive experience with



providing human rights trainings to security professionals and has previously conducted training and workshops on security and human rights topics to energy and oil and gas companies.

In April 2023 Eni submitted its first Full Member **Annual Report** where it depicted an overview of all the efforts done to improve more and more its engagement in VPSHR and to extend its Human Rights activity span to new Countries: a two-day Workshop on Security & Human Rights in Nigeria, Conflict Analysis Tool on Nigerian conflict. In October Eni issued its Revised Annual Report.

In May 2023 Eni joined as Full Member the **Annual Plenary Meeting** in London and the Global Head of Eni Security had his first public-speaking intervention on VPI stage debating Joint Ventures topic.

In the end of the year the outcomes of the **Conflict Analysis Tool implemented in Mozambique** were analysed and the result was the issue of the document in December 2023. The final version of the Mozambique Conflict Analysis Tool will be displayed in the first half of 2024.

Regarding the involvement of Eni in National Working Groups on Voluntary Principles on Security and Human Rights (VPSHRs), in Mozambique in 2023 took place many high-level events and technical meetings. Eni Security joined the events, represented by the Eni Rovuma Basin Security Manager, along with others energy companies. Representatives from Governments, Commissions, Embassies, Ministers and from International Organizations and Civil Society were present.

These meetings have the objective of discussing business, security and human rights challenges in the country (mostly, in Cabo Delgado) from the perspective of the private sector, and also of raising awareness about the Voluntary Principles and of promoting exchange on how Mozambique's membership of the VPI could advance security and human rights in the country. Providing VPSHRs training is an objective as well. Currently, high-level events are still held with progress.

Furthermore, on VPSHRs subject, Eni Rovuma Basin Security Manager joined several workshops set up in 2023 in Maputo.



Transparency

The sustainability report - Eni For – is the yearly issue that describes the company's commitments in its Long-Term Strategic Plan to 2050 - which combines financial, environmental and social sustainability – and the last achievements on that. To these, from 2019 was added an *ad hoc* Report on respect for human rights – Eni For Human Rights - which outlines Eni's strategy on promoting and respecting human rights and describes the main activities conducted and the performance indicators. The 2023 update is on its way and will provide information of human rights activities and performances conducted during the 2023 (publication expected for July 2024).



Examples of promoting and advancing implementation of the Voluntary Principles internationally

*“We (Eni) operate with respect for human dignity and **Human Rights** and we require the same commitment from all our partners. We ensure an inclusive work environment that values uniqueness and diversity as all territories in which we operate by working alongside the communities. We guarantee the efficiency and integration of our activities, minimizing risks and fundamental resources for the development of humanity”.*

Code of Ethics

A further Eni’s instruments to indirectly promote and advance the Voluntary Principles is the Eni’s Suppliers Code of Conduct: the document indeed describes the human rights minimum requirements and expectations that all Eni’s Suppliers, including international Suppliers, are required to meet and includes the reference to the Voluntary Principles on Security and Human Rights among those principles to be respected and promoted within the business relationship.

Among the activities to promote and advance VPs with its peers, there is the participation to the International Petroleum Industry Environmental Conservation Association (IPIECA) Responsible Security Task Force (RSTF): the discussions within the RSTF aimed at reinforcing the IPIECA community, exchanging best practices and challenges on Human Rights and Security and better implement the Voluntary Principles, through mutual discussions and reflections on future developments on the issue. In this regard, Eni has participated in the activities and meetings organized by the RSTF over the 2023.

Eni is heavily committed to gender equality and women's empowerment, as well as to preventing and combating gender-based violence with activities in the communities where operates. Once again, in 2023, Eni and its Senior



Management stood by the United Nations to support the Orange the World campaign that started on 25 November, the official date of the International Day Against Violence Against Women, and ran until 10 December, International Human Rights Day. The 2023 theme promoted by UN was 'Investing in prevention' to highlight now more than ever the importance of putting in place solid preventive measures in order to contain violence against women.

In this regard, Eni has deployed several initiatives involving women: from creation of income opportunities to access to education, the initiatives aim at enabling women to overcome economic dependency and socio-cultural prevarications, which are closely associated with gender-based violence.

As a result of its commitment and work on human rights, Eni ranked third overall in the extractive and apparel sectors and second among energy companies in the 2023 Corporate Human Rights Benchmark (CHRB) held by the World Benchmark Alliance (WBA).⁴

⁴ [https://www.eni.com/en-IT/sustainability/people-community/human-rights.html#:~:text=As%20a%20result%20of%20its,World%20Benchmark%20Alliance%20\(WBA\).](https://www.eni.com/en-IT/sustainability/people-community/human-rights.html#:~:text=As%20a%20result%20of%20its,World%20Benchmark%20Alliance%20(WBA).)



B. Policies, Procedures and related activities

Relevant policies, procedures, and/or guidelines (or any changes thereto from the previous reporting year) to implement the Voluntary Principles

Describe how the Voluntary Principles are incorporated into company policy framework and business practices

In 2023 Eni issued the “Ethics, Compliance and Governance (ECG) Policy on Respect for Human Rights in Eni” briefly introduced in Section A.

The new Policy aims to outline a single, transversal model included in the company’s normative system to ensure respect for Human Rights in the design of all corporate regulatory processes, considering ongoing regulatory developments on the subject. The document highlights the priority areas on which this commitment focuses and describes the due diligence management system, according to an approach developed in line with the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises.

In 2023 as well, the Board of Directors updated the Fundamental guidelines of Eni's Regulatory System defining its new architecture and laying the foundations for the development of the new regulatory instruments, in line with the requirements of our new business model. Therefore, also Security Regulatory System is currently under review. Among the reasons of this revision there is also the reorganization of Eni Security Department, characterized by a specific Unit dedicated to Security and Human Rights issues.

The most important Security regulation is the **Management System Guideline (MSG)**, that states: “Security activities are conducted in compliance with the Universal Declaration of Human Rights, the relevant national and international regulations and with the Voluntary Principles on Security and Human Rights. The respect of human dignity is a fundamental value that cannot be violated in any way. All security personnel protecting Eni people and installations shall respect these principles. Moreover, to



minimise the impact of its security systems on local communities, Eni undertakes protection plans and mechanisms that are more effective for protecting its people and installations”.

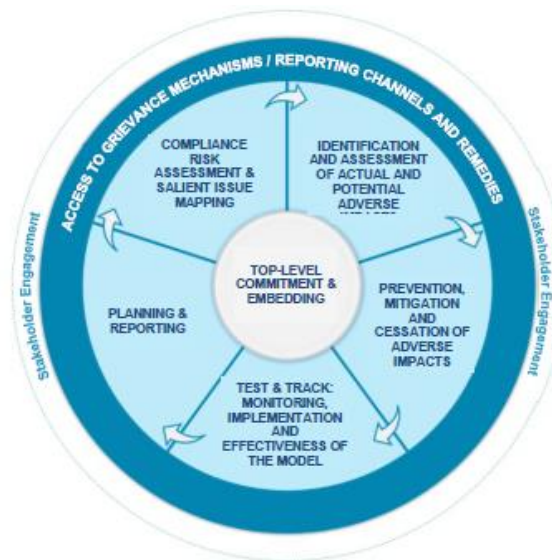
The implementation of Security and Human Rights items provided for by the Consolidated Text on Security Rules is carried out by means of the following actions:

- Implementation of the Due Diligence Model through the Risk Based Model (data and indicators updated at 2023);
- Recurring checks of Human Rights provisions (Model Clause) both in contracts with private Security providers and Memoranda of Understanding with public Security Forces;
- Training courses to public and private Security forces operating in Eni’s sites.



Risk Assessment

Company procedure to conduct security and human rights risk assessments, and integrate findings



The Eni's human rights due diligence - the process of identifying, evaluating, preventing and managing the negative impacts on human rights that the company can produce, or contribute to produce, through its activities and business relationships – is structured in line with the relevant international standards and on a risk-based approach. Eni has indeed developed a wide range of processes and tools to assess its salient human rights issues, risks and impacts which has been also designed to be multidisciplinary, multilevel, and integrated at any level of the company's processes. The due diligence



system is structured at central level and - in line with the salient issues identified - around the specific functions of Human Resources, Security, Procurement and Sustainability which are responsible for managing human rights linked with the following issues: i) Procurement for risks along the supply chain; ii) Human Resources for risks at the workplace; iii) Security for risks in managing security operations; Sustainability for risks referred to communities in relation to specific industrial projects

Namely, the due diligence of the industrial projects is performed to identify specific risks of the projects and evaluate the proper actions to be undertaken, as part of the wider integration of sustainability issues into the business cycle. Specific security issues related to the context are taken into consideration to assess the risk level of the specific project.

According to the characteristics of the project, different assessments are conducted to identify and evaluate potential impacts on human rights: ad hoc **Human Rights Impact Assessment (HRIA)** which foresees an activity of engagement/consultation with communities involved in the projects and which is launched in case of high-risk projects. Following the analysis, and based on the findings, a Human Rights Action Plan with specific preventive and/or mitigation measures is defined.

Also for 2023 Eni has implemented the **“Security and Human Rights Risk Based Model”** by updating the underlying data and indicators. This model considers specific parameters, that are split into two clusters based on “Context elements” and “Eni presence in the area”. In the first group there are Security Country Threat parameter and Human Rights Risk parameter (the risk of human rights is a component of the ethical threat). Both the Security Country Threat and Human Rights Risk are given by an external provider. In this first cluster there is the index named “Security Forces and Human Rights”⁵, that measures the risk of business complicity in human rights violation 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

⁵ This indicator is provided by the database of Verisk Maplecroft, a leading research firm specialising in global risk analytics, country risk insight & trusted advisory (see next).



violations. Violations of the human rights by security forces include, as indicators, arbitrary arrests and detentions, extrajudicial or unlawful killings and torture or other ill-treatment of individuals.

The previous indicators analyse the degree to which the right concerned is protected within a state by assessing the reported violations and infringements by both state and non-state actors. Lower-level abuses in the field of human rights are automatically reintegrate in the aforementioned indicators, especially in Other ill-treatments (e.g. bullying, humiliating, disregarding, neglecting or ignoring a person or a group of people due to their ethnic group or beliefs, etc..).

This indicator redefined Eni Risk map, enriching with a different perspective the already existing Model.

Operating activities on the field are always changeable and indicators like the above-mentioned are very helpful to update the Country Model to the current situation.

Clusters are likewise helpful; they subdivided the indicators in a balanced scorecard; they give sensitivity on how the threat is high and how the presence of Eni is rooted in the Country.

Indicators and clusters must be suitable for coping with operating activities and needs.

In the second group we find factors such as personnel in the country, presence of armed surveillance and a business parameter that measures the Country strategic significance for Eni.

Furthermore, this model enables to spot which Countries are worth of intervention and which type of intervention carry out.

As usual, we unfold Human Rights Threat and Max Threat; the ten most at risk Countries stand out in the ranking, their final score ostensibly high. The type of risk is essentially based on the elements object of the Risk Based Model as detailed above.



We attach below the 2023 Risk Based Model, focusing on the first ten Countries resulting from the implementation of the Model itself.

Nation	CONTEXT				ENI PRESENCE						Ranking	"Security & Human Rights" workshop year	Priority
	"Hum an Rights" Threat	Max Threat	Sites	On Force Personnel	50 score s			50 score s					
					"Hum an Rights" Indicator	"Max Threat" Indicator	Security Forces and Hum an Rights	"On Force Personnel" Indicator	"Arm ed Surveillance " Presence	"Business" Indicator			
IRAQ	8,8	8,09	2	218	20	20	10	10	20	20	100	2011	1
NIGERIA	7,3	7,87	21	2377	20	20	10	10	20	20	100	2022	2
LIBYA	8,9	8,42	1	131	20	20	10	7	20	20	97	0	3
MOZAMBIQUE	6,3	6,21	4	175	20	20	10	7	20	20	97	2014	4
ECUADOR	6,3	5,6	7	401	20	20	7	10	20	20	97	2016	5
ALGERIA	8	6,48	3	115	20	20	7	7	20	20	94	2013	6
EGYPT	8	6,14	5	380	20	20	10	10	10	20	90	2010	7
TURKMENISTAN	8,9	4,65	2	907	20	20	7	10	10	20	87	0	8
CONGO	8,3	6,14	15	580	20	20	7	10	10	20	87	2012	9
TUNISIA	6	5,92	4	262	20	20	7	10	10	20	87	2018	10



Engagements with Security Forces

Company procedure or mechanism to report security-related incidents with human rights implications by public/private security forces relating to the company's activities

Eni is committed to actively cooperating with State Authorities and Government Entities in the implementation of Human Rights programs and to contribute, by respecting human rights in its activities and relations, to fostering respect for Human Rights, including by enhancing collective awareness on the importance of these principles, and to express its concern about any Human Rights issues that may arise in countries where it operates. Currently, the company process for reporting allegations of security-related incidents with human rights implications by public/private security forces to the appropriate authority is under review.

Company procedure or mechanism to investigate and remediate security related incidents with human rights implications by public/private security forces relating to the company's activities

Describe the company's grievance process for responding to and remediating adverse impacts

Grievance mechanisms and other reporting channels are provided at both operational level and company-wide and are made available to enhance the opportunities for the Company to identify and promptly investigate potential and actual human rights impacts and take appropriate action. The Grievance Mechanisms is regulated by a specific company procedure (Annex C to the MSG Sustainability) and provides instruction on both the design and implementation of such mechanisms and defines the set of activities to be carried out when Eni receives from communities, in writing or verbally,



concerns or grievances in relation to its activities. Multiple access points and dissemination activities are foreseen to guarantee complainants having adequate knowledge and access to the grievance mechanism: directly to the function responsible for receiving grievances, by writing to a dedicated e-mail address, by letter, through the company website, through a dedicated telephone number, through trusted third parties (NGOs, local associations, etc.).

The feedback about the grievance received is notified and discussed with the complainants and the company: the complainant is asked to communicate any observations or alternatives to the solution found and proposed by the company which duly takes note of it in an appropriate form.

Details about grievance received, issues raised and their resolution will be published in Eni for 2023.

The company procedure on Grievance Mechanism was recently updated to include a specific categorization of grievance with significant implications of potential/current negative impacts on human rights and therefore considered of “High severity”. Within this category of “high severity” are falling also potential grievances involving cases of violence, threats, aggression, intimidation, harassment or serious harm to communities by Eni suppliers or security forces (public or private) protecting Eni’s employees, facilities, assets and operations.

In case of grievances assessed with “high severity”, the process of assessment and management of the grievance at local level escalate to HQ and is conducted in coordination the Central Sustainability Function, which may formulate recommendations to support the management/resolution of the grievance, also in terms of compliance with corporate commitments and international standards adopted by Eni. The company procedure on Grievance Mechanism is currently being updated to be also aligned with the new “ECG Policy on Respect for Human Rights in Eni”.

Eni also uses a Whistleblowing reporting management system that enables anyone to send reports on issues pertaining to the internal control and risk management system or other violations of the Code of Ethics, including potential claims with human rights implications.



C. Country Implementation

Overview of country operations selected for reporting

In line with its commitment to respect for human rights, Eni carries out project-focused assessments on its potential and actual human rights impacts, including those potentially generated and/or linked to management of security activities, with the aim of preventing and/or mitigating them.

The HRIAs methodology relies on the most relevant international standards and guidelines, such as the one developed by the Danish institute for Human Rights. This methodology entails a preliminary analysis of scoping, based on desktop searches and remote interviews, and a field visit, where rightsholders are consulted during dedicated meetings by a third expert. Focus groups are held to ensure the participation of vulnerable groups, while local NGOs, international organizations, Business Partners and suppliers are usually engaged through meetings and interviews.

The results of the HRIA are finalized in a Report with recommendations, followed by a dedicated action plan adopted by Eni to address the recommendations. If needed, recommendations and actions are also related to the relation with the Business Partners, such as JV partners and suppliers, with the goal of accompanying them in a virtuous path of improvement and mitigating the potential human rights risks highlighted during the HRIA.

In 2023, in-depth HRIA studies launched in 2022 were finalized in Kenya and Congo, focusing on agri-feedstock to produce biofuel. A follow up assessment was also concluded to verify the implementation of the three-year action plan related to the HRIA study conducted in Mexico in 2019, and the action plans also continued.



Engagements with stakeholders on country implementation

In 2023 a major engagement with stakeholders was the implementation of the Conflict Analysis Tool in Mozambique.

Likewise in Nigeria in 2022, Eni Security collected interviews from representatives of Mozambican society, members of local communities and other local actors.

The main stakeholders Eni listened to were fishermen, community leaders, lecturers, ombudsmen, Human Rights activists, policemen, companies' managers, contractors, public official from Ministries.

This activity allowed Eni to further understand Mozambican culture and mindset. The activity was organized throughout the 2023 with interviews in Pemba and Maputo, trying to divide the interviewees in different clusters, according also to Conflict Analysis Tool Potential Key Actors.

The most relevant themes discussed on this occasion were: Government actions and NGOs and Human Rights activism and how they affected people's life; elderly and community leaders' role; minority groups and women conditions; public and private security forces perception in the communities. All these topics were scrutinized from the unique perspective of any interviewee.

Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as arrangement with public security forces

The procurement process for security goods and services, including the selection of private security providers, is regulated in accordance with the provisions of "Security Management System Guideline".

It shall ensure the selection of suppliers/contractors meeting strict reliability, integrity and ethical requirements, including verification of suppliers/contractors in serious infringements of human rights. Besides,



another company procedure, a Professional Operating Instruction named **“Provision of security goods and services by central security function”**, reaffirms this concept, providing that, in contracts with security services providers, specific clauses regarding conduct aimed at respecting human rights are included.

Regarding the **process and the efforts to promote the Voluntary Principles with private security providers and public security forces**, special clauses aimed at respecting Human Rights are added in contracts that have been entered in public and private security agreements.

With reference to contracts with private security forces, model clause claims that the Parties undertake to ensure the respect and protection of Human Rights in line with the UN Guiding Principles on Business and Human Rights and in accordance with the standards and principles set out in the Applicable Law and Human Rights International Laws. The Parties also commit to act according to the provisions of the Voluntary Principles on Security and Human Rights, the Code of Conduct for Law Enforcement Officials of the United Nations and the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials of the United Nations. In the second part of the Model Clause is established that the contractor undertakes in particular to: i) respect, protect and enforce the human rights of every individual, without any discrimination of gender, race, religion, personal and social conditions, language, sexual orientation, political opinions; ii) provide adequate working conditions to its employees and to respect the prohibition of the use of forced labor and child labor, the right of everyone to freedom of peaceful assembly and association, the right to engage in collective bargaining or other related rights. Furthermore, it is established not to employ, for the provision of security services, persons under the age of 18 nor individuals credibly implicated in human rights abuses, ensuring that security personnel are adequately trained to respect the rights of employees and the local communities.

In the contractual clause it can be found the obligation for the contractor to comply with the US Global Magnitsky Act, enacted in 2016. According to the wording of the clause, the contractor must declare and guarantee to comply with the principles contained in the applicable international regulations,



laws, agreements and best practices and in the guidelines aimed at preventing and combating human rights violations, including the US Global Magnitsky Act and related executive orders. In 2022 Annual Report we accounted for the ominous story of the Russian tax lawyer Sergei Magnitsky.

Eni adopts a human rights clause both within Memoranda of Understanding (MoU) signed with Governments and within contracts signed with public security providers. Parties of the MoU are requested to act accordingly and in compliance with the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights, the Code of Conduct for Law Enforcement Officials of the United Nations and the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials of the United Nations.

Eni cooperates with public security forces not only by signing Memoranda of Understanding, but also by engaging in open and continuous dialogue. In the design of training initiatives, for instance, public security forces are considered partners instead of participants: this means that public security forces are already involved in the early phases of such initiatives' planning, building on their input and support, and this also includes the participation of top army ranks. Eni uses this approach with public security forces because building consensus with leaders pays in terms of participants' commitment. This is particularly important in the Countries where security can only be managed by public security forces.

Examples of supporting outreach, education, and/or training of (i) relevant personnel, (ii) private security, (iii) public security, and/or (iv) civil society (e.g. local NGOs, community groups)

A further confirmation of Eni's commitment to the protection and promotion of Human Rights was **"Security & Human Rights Workshop"**.

On November 13th, 14th and 15th, 2023, Eni developed and conducted a three-day training programme in Iraq on security and human rights addressed to field level and command security personnel. The first day, set



up in a Basra hotel, consisted of a half day security and human rights workshop. Decision-makers, politicians, civilian and military/police authorities, and Eni's management attended the workshop (Italy Ambassador, Basra region Governor, Members of Iraqi Parliament; FAO and UNICEF representatives). Local media were present and gave the event a remarkable echo. The second and third days, organized in Zubair Eni training centre, consisted of security and human rights training for Public and Private Security Forces. The training was conducted in Arabic, with an English translation, by an experienced external provider, who has extensive experience with providing human rights trainings to security professionals and has previously conducted training and workshops on security and human rights topics to energy and oil & gas companies. Hereby, some pictures of the event.







Another example of supporting outreach, education and training of private and public security forces is the project named **“In-Country Security & Human Rights Workshops”**. This project is addressed to Public and Private Security Forces operating in the first 10 most-at-risk Countries, according to 2023 Eni Risk Based Model. The reason why we created this project lies in Eni wish that training courses organized by Eni Headquarters in different countries should not be isolated initiatives. The main issue is that Eni commitment on Human Rights training must tackle the frequent turnover of Security Providers Personnel. That’s why Eni conceived this project, preparing all the material that Eni’s Subsidiaries need to organize independent Security and Human Rights Workshops. Implementation of the Workshops will be on a regular basis, helping to improve VPSHRs dissemination.



This image below shows the countries where the project will be implemented.



After a massive e-learning program on Human Rights, Eni developed the **Security and Human Rights module**, which encompasses the relevant human rights impacts potentially deriving from Security operations and the Company's responsibilities. The educational program includes case studies on the freedom of expression and the limits to the use of force and weapons according to internationally recognized human rights. Obviously, a part of this e-learning is specially dedicated to the explanation of the Voluntary Principles on Security and Human Rights.

This online training course on security and human rights is attended by all Eni's employees.

Eni considers indeed training and awareness-raising activities dedicated to its employees and Business Partners an essential element of its commitment to respecting human rights. 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: i) General courses on Business and Human Rights for all Eni people; ii) Specific courses on topics and areas particularly exposed to risks of negative impacts; iii) Training initiatives on issues closely linked with human rights (e.g. Code of Ethics, HSE, etc.); iv) Training courses on Security and Human Rights.

In 2022, the three-year training cycle on the specific courses on topics and area particularly exposed was completed with a participation rate of 97% of the target population (senior managers and middle-managers in Italy and abroad). During the last three years, more of 38,000 hours of training were provided among staff and middle and top managers on human rights program.

In 2023 these modules were made available to all Eni's employees in addition to the general courses on business and human rights and more than 1,000 hours of training have been accessed by staff and middle and top managers on the human rights program. To promote the knowledge on human rights management, free access to the "IPIECA Online Labour Rights Training" course developed in 2022 was made available for colleagues who deal with purchasing abroad and their suppliers. The training course was developed with 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.



D. Lessons and Issues

Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization

Describe lessons learned (including through implementation of the verification framework), action plans to implement the Voluntary Principles in the upcoming year, and/or new initiatives or programs related to the Voluntary Principles in the upcoming year

In 2023 reporting year Eni undertook the implementation of the **Conflict Analysis Tool in Mozambique**.

The engagement activities of the conflict tool included interviews of different representatives of community. Likewise the activity conducted in Nigeria, engagement took into account representatives of National and local Institutions, vulnerable groups, civil society organizations. The picture emerged from these interviews analysis is multifaceted: the most fragile groups like women and young people are seen as a good opportunity for an exchange of experiences and engagement with the company, but also as a priority cluster to whom give education and jobs.

The different perspectives depicted (from fishermen to lecturers) will be displayed in the final edition that will be issued in 2024.

The Conflict Analysis Tool issue is the first action Eni will deploy in Mozambique in 2024 in terms of Security and Human Rights-related initiative.

Other initiative will be the **Workshop on Security and Human Rights** that will take place in Mozambique as well. A new edition of the Training program involving Security Forces is planned in Mozambique, in its High Officials and Low ranks version and run by an external provider.

Furthermore, a new tool is already deployed in 2024 in the Countries where the risk of Human Rights violation is highest: **an In-Country Workshop on**



Security and Human Rights, a different way to ensure uptake of Human Rights sensitivity that is going to be detailed below.

New initiatives and programs related to the Voluntary Principles in 2024

The main 2024 initiatives are: the aforementioned **In-Country Workshop on Security & Human Rights** and the **Human Rights Salient Issues updating**.

Regarding the **In-Country Workshop**, the initiative is aimed at spreading Human Rights awareness and sensitivity, giving a main role to local Security Managers and Security Officers instead of the external security provider. Below there is a Gantt chart illustrating the project timing.



In particular, the project was launched at the end of 2023. Coordination meetings with the subsidiaries began in February 2024. The objective is to carry out two phases of implementation of the workshops: the first between March and July, the second between September and December. Finally, it is expected in December a year take-stock.

One of the first outputs is the responsibility of local management in promoting and disseminating human rights to their colleagues.

Eni strongly believes in this project, which will allow the implementation not only of the classic course on security and human rights held by an external trainer, but of many training courses, in 10 countries, led by Security Managers and Security Officers making them to feel responsible on promoting human rights.

About the **Human Rights Salient Issues updating**, Working Groups are set about assembling with a mapping of new potential issues.

