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**ENI S.p.A.**

**ANNUAL REPORT ON VOLUNTARY  
PRINCIPLES ON SECURITY AND HUMAN  
RIGHTS 2021**

**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 awareness of the Voluntary Principles throughout the organization or government, including within the value chain

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)

Company procedure to review progress on implementing the Voluntary Principles at local facilities

### **(D) Lessons and issues**

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

### **(E) Engaged Company Progress on Implementation**

Engaged Company's progress report on the Roles and Responsibilities of Companies

Engaged Company's use of Voluntary Principles Tools



## ***Introduction***

Eni operates with respect for human dignity and is committed to ensuring respect for internationally recognized Human Rights in all its activities and those of its commercial partners, in line with the United Nations Guiding Principles on Business and Human Rights (UNGP), with the OECD Guidelines for Multinational Enterprises and with International Human Rights Treaties and Standards.

Eni's approach to human rights is further confirmed in the Global Framework Agreement on International Industrial Relations and on Corporate Social Responsibility renewed in 2019.

This report describes the efforts Eni made in its second-year engagement period in order to implement the Voluntary Principles commitment.

The following Sections display also the challenges Eni undertook in 2021 in enhancing its commitment in 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**

In 2021 Eni, as Engaged Corporate Participant, proved its commitment of the Voluntary Principles through its main company documents and several actions.

Public Statements of commitment or endorsement of the Voluntary Principles are enshrined in several Eni's fundamental documents:

**Eni Code of Ethics**<sup>1</sup> mentions 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. On the Code of Ethics, a training program relating to its content was developed and disseminated among all Eni's employees and an e-mail box was created to clear doubts and answer questions on Code of Ethics content. Further, to help all Eni's people to fully understand this paramount document, Eni Code of Ethics is available in 12 languages.

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

**Eni's Statement on respect for Human Rights**<sup>2</sup>, approved by the Board of Directors in 2018, illustrates the company's commitment on respect for human rights. The document aims to meet the requirements set out in the UN Guiding Principles starting from an explicit commitment to both

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<sup>1</sup>[https://myeni.eni.com/en\\_IT/being\\_Eni/organization/code\\_of\\_ethics\\_new\\_eng.html](https://myeni.eni.com/en_IT/being_Eni/organization/code_of_ethics_new_eng.html);

<sup>2</sup> <https://www.eni.com/assets/documents/documents-en/Dichiarazione-Eni-DU-ENG.pdf>;



implementing the human rights due diligence and providing access to remedy. Moreover, the Statement sets out Eni's human rights salient issues and outlines the standards and processes in place to manage them and – with regard to security and human rights – makes reference to the Voluntary Principles on Security and Human Rights and to the United Nations Basic Principles for the Use of Force and Firearms by Law Enforcement Officials. Eni's commitment on Voluntary Principles is also included within the **Eni's Supplier Code of Conduct**, adopted in 2020, which sets specific expectations for suppliers and represents a key reference for all suppliers and business partners in the relations with Eni.

These commitments are also reflected in our reports, such as **the Consolidated Disclosure of Non-Financial Information**<sup>3</sup>, Eni For and Eni for Human Rights, the latter representing a dedicated report on Eni's activities and performances on human rights.

In addition, Eni published its commitments on human rights and on Voluntary Principles on Security and Human Rights in its website, where a direct link to the Principles is provided<sup>4</sup>.

Finally, also MyEni website displays all the aforementioned documents and encourages their dissemination, above all in operation sites, where Human Rights are most at risk.

#### *Describe senior management's understanding of and commitment to the Voluntary Principles*

The commitment to the Voluntary Principles was affirmed and strengthened by Head of Security, Alfio Rapisarda, who stated, during the 2021 Workshop on Security & Human Rights held in Mexico, that: "All security activities at Eni are conducted in accordance with the Universal Declaration of Human Rights, relevant national and international regulations and the Voluntary Principles on Security and Human Rights".

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<sup>3</sup> <https://www.eni.com/assets/documents/eng/reports/2020/Annual-Report-2020.pdf>;

<sup>4</sup> <https://www.eni.com/en-IT/just-transition/respect-for-human-rights.html>



In the occasion of the 2021 World Human Rights Day, December 10, Eni's Head of Sustainable Development, Alberto Piatti, celebrates the event with the following words<sup>5</sup>:

*"Eni celebrates **World Human Rights Day** as a further impetus to continue on the journey to improve corporate standards launched in 2016 by the CEO. Respect for and the promotion of human rights wherever we operate are at the core of Eni's culture and an integral part of the company's commitment to be a key player in the inclusive energy transition".*

The occurrence was also highlighted by John Morrison, Chief Executive of the Institute for Human Rights and Business (IHRB). His speech was displayed on MyEni<sup>6</sup>, alongside with the Head of Sustainable Development quote.

Eni's management commitment to Voluntary Principles and human rights is supported by management objectives. 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.).

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.

In 2021, such objectives have been further strengthened this process of attribution of incentives linked to performances on human rights, by assigning specific objectives to the top managers reporting directly to the CEO and to senior managers, including Managing Directors from Subsidiaries. These Management Objectives linked to several human rights targets are reviewed annually according to the Action Plan on human rights and the issues emerging from the due diligence.

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<sup>5</sup> [https://myeni.eni.com/en\\_IT/news/2021/12\\_14/giornata\\_internazionale\\_diritti\\_umani\\_eng.html](https://myeni.eni.com/en_IT/news/2021/12_14/giornata_internazionale_diritti_umani_eng.html)

<sup>6</sup> [https://myeni.eni.com/en\\_IT/news/2021/12\\_14/giornata\\_internazionale\\_diritti\\_umani\\_eng.html](https://myeni.eni.com/en_IT/news/2021/12_14/giornata_internazionale_diritti_umani_eng.html)



Human Rights and security are also included within the issues discussed within the Sustainability and Scenarios Committee (SSC). 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.

In 2021, the Sustainability and Scenarios Committee examined several aspects directly or indirectly concerning human rights, including the Eni's due diligence approach and its risk models<sup>7</sup> elaborated and implemented referring to direct workers, suppliers, security forces and industrial projects and the Slavery and Human Trafficking Statement 2021.

#### Engagement in the VPI

Eni strives to abide by Voluntary Principles Initiative Governance Rules, starting from Participation Criteria and Admission Process.

Eni joined the Annual Plenary Meeting in March 2021 as Engaged Corporate Participant and attended several webinars and events organized by the VPI Secretariat. In May 2021, Eni undertook its first Verification Presentation. During this event, after providing an overview of company's history, business and global presence, Eni explained its commitment, mission and vision on respect and promotion of human rights also by means of access to remedy (grievance mechanism). In particular, the key part of this presentation was focused on Security and Respect for Human Rights. Eni explained how its commitment is expressed through three different items: i) regulatory system (Human Rights Policy, Security Management System Guideline and Specific Procedures); ii) security organization (Human Rights dedicated Unit in Security Department); iii) actions (many and relevant actions carried out to promote and strengthen Eni commitment on Human Rights, among which: Human Rights monitoring, Training courses, Risk based model and other initiatives on security and human rights issues). Finally, Eni joined Corporate Pillar Meeting in May 2021.

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<sup>7</sup> These risk models are not related to the "Security Risk based Model", analysed in Section B "Risk Assessment" of this Report.





### Transparency

Regarding a mechanism for communicating statements of commitment publicly every year Eni publishes its sustainability report 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 reports, in December 2019 (latest release available) was added an ad hoc Report on respect 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 2021 update is under elaboration and will provide information of human rights activities and performances conducted in the course of the 2021.

### ***Examples of promoting awareness of the Voluntary Principles throughout the organization or government, including within the value chain***

On June 16<sup>th</sup>, 2021, the VPI Steering Committee approved the “Eni Voluntary Principles Implementation Plan”, based on Eni Verification Presentation. It's precisely through the implementation of this Plan, consisting of five different actions, that Eni has further strengthened its commitment to the Voluntary Principles and increased internally the dissemination of their awareness.

As for the promotion of the awareness in its value chain, Eni has elaborated a dedicated “appendix/addendum” which is included in the agreements with the contractors when they conduct and manage (in full/in part) operational and security activities on behalf of Eni. This appendix requires the contractor a specific commitment on conducting the activities in line/compliance with the Voluntary Principles on security and human rights.



### Modify Ethical and Risk Assessment procedure

In 2021, Eni asked to its supplier, a third-party company that produces an evaluation form called “Ethical Threat Report”, to broaden the ethical threat analysis of each country where Eni operates, formally clarifying in each Report *“the extent to which the practices of [...] Security Forces - with regards to popular freedoms or rights - fail to meet international human rights standards as established within the United Nations”*.

Furthermore, in 2021 Eni has updated and improved the “Security and Human Rights Risk Based Model”, which aims to identify, analyse and prioritize the countries most at risk of negative impact on human rights in security activities and to weigh preventive or defensive measures. The purposes of this Model, its characteristics and the updates realized in 2021 will be described in more detail in the section “Risk Assessment” of this report.

This model, by identifying the highest risk countries, allows Eni to understand where it’s most necessary to implement and disseminate the Voluntary Principles.

### Successes and challenges of the use of the Model Clauses in agreements with public and private security

#### *Overview*

Over the years Eni has constantly strived to spread and enhance Model Clauses use in public and private security agreements.

The 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.



Specifically, a Contractor [...] must respect the obligations related to the protection of human rights that result from the “*Universal Declaration of Human Rights*”, from the “*International Covenant on Civil and Political Rights*”, from the “*International Covenant on Economic, Social and Cultural Rights*” and from the “*Declaration of the International Labor Organization on Fundamental Principles and Rights at Work*”. The contractor also undertakes to abide to what is provided in the “*United Nations Code of Conduct for Law Enforcement Officials*”, the “*Basic Principles on the Use of Force and Firearms by Law Enforcement Officials*” and the “*Voluntary Principles on Security and Human Rights*”.

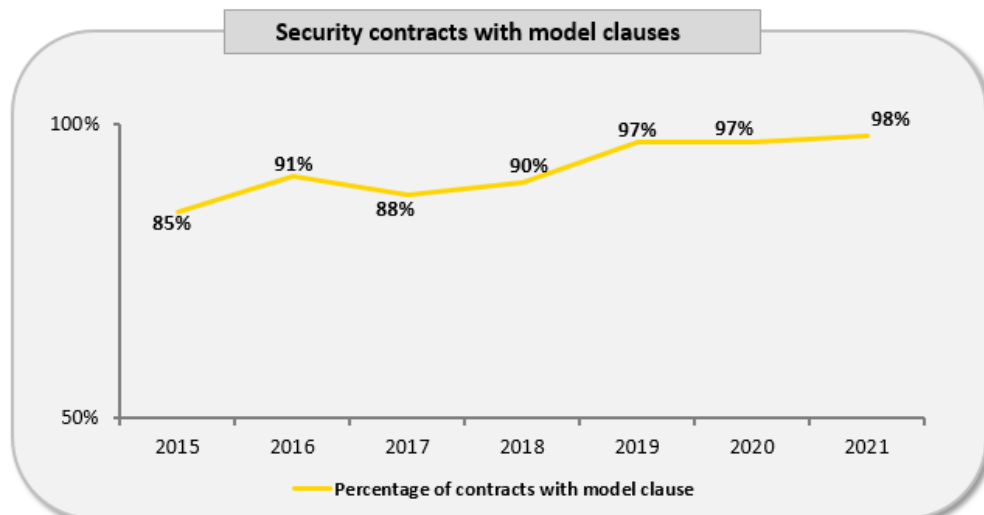
**Successes:** In 2021 Eni reached the 98% of Model Clauses usage in all the contracts signed by 2021.

The Model Clause presence percentage increased during the last 5 years from 88% in 2017 to 98% in 2021.

**Challenges:**

The main challenge for Eni is further increasing model clause coverage in next years.

Here is a graphic about the percentage trend of contracts equipped with a model clause.





*Enhance monitoring capacity, including regarding the impact of VPSHR measures and report on such enhancement: Human Rights violations as a Security event*

In order to improve the monitoring capacity, also including the impact of VPSHR measures, a new type of Security event was included in Security dashboard<sup>8</sup>: Human Rights violation.

This is the latest Indicator Eni embedded in Security Dashboard, to monitor the specific issues related with violations of the essential Human Rights granting dignity and equality: non-discrimination right, freedom of thinking, freedom of expression, freedom of movement, right to democracy, etc. Regarding Security Forces, such actions consist of arrests and arbitrary detentions, extra-judicial executions, compulsory disappearing, tortures or other kinds of mistreatments.

Starting from 2022, this type of event will be recorded as a type of Security event of its own and included in the Annual Management System Security Report.

The knowledge and the awareness of this initiative, based on Voluntary Principles, was disseminated throughout security organization.

*Describe processes or efforts to promote the Voluntary Principles with contractors and sub-contractors*

On relations with business partners, Eni adopts a human rights clause both within Memorandum of Understanding (MoU) with Governments and contracts concluded with 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

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<sup>8</sup> It refers to the Emergency Management Analytical Platform (e-page), a structured management application which, by integrating the information contained in corporate and external databases, supports the Employers and the security managers/security officers during risk assessment activities and the management in handling emergencies, and in collecting and monitoring data related to the functioning of the security management system. It also allows all the important security information to be stored and filed. It is the main tool for controlling the security management system.



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 this regard, MoU clause has been renewed in 2019. For security providers, specific clauses of conduct requiring respect for human rights are included in the contracts, especially in relation to operating instructions and workers' rights.

Within Joint Operating Agreements (JOA) and Production Sharing Agreements (PSA) in 2019, with regards to Upstream and Exploration contracts negotiation activities, two clauses on respect for human rights within PSA and JOA have been drafted. Both the clauses have been disseminated through ad-hoc webinars addressed to the negotiators and commercial managers. It is included a specific reference on the need of conducting security activities without adverse impacts on people and communities and both the clauses recall the UN Guiding Principles on Business and Human Rights. The clauses have been adopted in several agreements conducted in the course of 2021.

### ***Examples of promoting and advancing implementation of the Voluntary Principles internationally***

*“[Eni promotes] socially responsible behavior, work practices, and expect our suppliers and partners to operate in line with our high standards of respect for Human Rights and environmental protection [...] believes in the importance of establishing strong, lasting relationships and partnerships with the communities in which it operates in order to build lasting, shared values. [...] respects rights of people and communities by recognizing and enhancing their culture, lifestyles, institutions, ties with the land of origin and development models in line with international standards” (Code of Ethics).*

In line with its commitments on human rights and the principles of its Code of Ethics, the MSG Anti-Corruption and of Eni's Statement on respect for



Human Rights, in 2020 Eni has adopted the Supplier Code of Conduct. The document describes the minimum requirements and expectations that all its Suppliers, including international Suppliers, are required to meet on respect for human rights and includes the reference to the Voluntary Principles.

As for activities of promoting and advancing of VPs with its business partners and peers, Eni joined the International Petroleum Industry Environmental Conservation Association (IPIECA) Responsible Security Task Force (RSTF) in order to reinforce the IPIECA community, routinely discuss Human Rights and Security and better implement the Voluntary Principles, through peers' sharing of best practices, challenges and future developments on the issue. In this regard, Eni has participated to the activities and meetings organized by the RSTF over the 2021.

As a result of its commitment and work on human rights, in 2020 Eni was ranked first, *ex aequo* with another company, among the 199 companies assessed by the Corporate Human Rights Benchmark (CHRB) on performance on respect for human rights by business. The work carried out over the past year has indeed allowed Eni to further improve its performances, with particular focus on human rights due diligence process adopted by Eni in order to identify risks and face potential impacts on human rights.<sup>9</sup>

*Describes efforts to work with civil society organizations, local NGOs and partners to promote and understand the Voluntary Principles*

About the efforts of the company with civil society organizations and NGOs, and considering also security and human rights issues, in Nigeria Eni is planning a series of initiatives to turn resources to the development of economic empowerment projects, with the aim of supporting local development and consistently with the contribution submitted by NAOC and the local NGO SACA (Stakeholder Alliance for Corporate Accountability) to the UN WG on Business & Human Rights within the Project "Business in

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<sup>9</sup> <https://www.eni.com/en-IT/media/press-release/2020/11/eni-ranked-top-by-corporate-human-rights-benchmark.html>



conflict and post-conflict contexts" (2020). The Project was launched by the UN Working Group in 2018, with the aim of promoting the implementation of the UNGPs in conflict and post-conflict contexts. The objective was to identify policies and practices for States and business across the full "conflict cycle" and the three "Protect, Respect and Remedy" pillars of the UNGPs. NAOC, Eni SpA subsidiary operating oil & gas production in the Niger Delta environment since 1962 and SACA, an NGO operating in Bayelsa State of Niger Delta and focusing on environment, human rights and sustainable economic development promotion, in an effort to share their views of the problems and the possible solutions in the context of Niger Delta, tried to open a transparent dialogue and share their mutual experiences in the State of Bayelsa.



## ***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***

The Management System Guideline (MSG) states that “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 recently updated and improved Risk Based Model;
- Writing of the strategic chart “Security & Human Rights Action Plan”, shared with Sustainability Dept.;
- Recurring checks of Human Rights provisions (Model Clause) both in contracts with private Security providers and Memories of Understanding with public Security Forces;
- Training courses to public and private Security forces operating in Eni’s sites.

Eni's commitment on human rights is based on the dignity of each human being and on the company’s responsibility to contribute towards the wellbeing of the people and communities in the countries where we operate. This model is enshrined mainly in the MSG Sustainability, the





Management System Guideline of Eni Sustainability function which represents the regulatory document of these activities.

According to the MSG Sustainability, Eni's model on respect for human rights is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGP) and based on three fundamental elements: "Policy Commitment"; "Due Diligence on human rights", and "Access to remedy". As an Annex to this fundamental document, Eni adopted a new internal procedure ("Respect and promotion of human rights in Eni's activities") which is specifically focused on human rights and is aimed at regulating Eni's human rights due diligence process both at entity and process level and which identifies specific areas of risk linked to Eni's salient issues, including security and human rights.

The 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 - follows a risk- based logic and is carried out by the relevant functions for the concerned process.

### ***Risk Assessment***

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

Eni has developed a wide range of processes and tools to assess its salient human rights issues, risks and impacts and has been working on the design, implementation and reporting of Eni's human rights due diligence process to ensure its alignment with the UN Guiding Principles on Business and Human Rights.

The due diligence system is structured around the specific functions due diligences carried out according to the salient human rights issues and the due diligence on industrial projects. On the first ones, there are some specific functions primarily interested in managing human rights due to the process managed: i) Procurement for the issues along the supply chain; ii) Human Resources for issues at the workplace; iii) Security for the issues in managing security operations.



The due diligence of the industrial projects is performed in order 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 or Human Rights Risk Analysis (HRRR) in case of medium-risk project. In both cases, an Action Plan is defined based on the findings.

In 2021, 100% of new projects in exploration and development phase have been evaluated and prioritized according to the risk-based model. All the projects resulted at risk of human rights have been assessed: Eni has indeed conducted two HRIAs in Angola and Albania and two HRRAs in Oman and Sharjah Emirates (UAE), for which specific human rights action plans are being launched.

Furthermore, for the analysis conducted in 2018 and 2019 in Mexico and Mozambique, the realization and implementation of actions foreseen in the human rights action plans proceed. All reports of the Human Rights Impact Assessment conducted until 2020 and the related Human Rights Action Plans are public and available on Eni's website.

As anticipated in the previous section A of this report ("Commitment to the Voluntary Principles"), in 2021 Eni has updated and improved the "Security and Human Rights Risk Based Model".

In particular, this model considers specific parameters, that are splitted 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 also a new index, recently



adopted, named “Security Forces and Human Rights”<sup>10</sup>, 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 violations. Violations of the human rights by security forces include arbitrary arrests and detentions, extrajudicial killings, enforced disappearances, and torture or other ill-treatment of individuals. 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. Especially, the Model resulted in 2021 Action Plan established the following activities:

1. Collecting current Security contracts in first ten countries resulting from Risk Based Model, in order to verify if Human Rights provisions are present or not;
2. Verifying assignment and use of Security resources/services provided to Private and Public Security Forces operating in sites of the first ten countries resulting from Risk Based Model;
3. Rolling out, in cooperation with personnel of Mexico Headquarters, a “Security and Human Rights” workshop in Mexican Subsidiary by an external provider. Given the Covid-19 outbreak, it took place in a thoroughly checked facility and also in a remote way.

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<sup>10</sup> This new indicator is provided by the database of Verisk Maplecroft, a leading research firm specialising in global risk analytics, country risk insight & trusted advisory.



## ***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 actively engaged in ensuring proper access to remediation measures. Eni is committed to verifying and providing, or cooperating to provide, remediation in case of adverse human rights impacts it might have caused or contributed to, and to making all efforts to promote the achievement of the same goal in cases where the impact is directly linked to its operations, products or services.

### ***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, in writing or verbally, concerns or grievances in relation to its activities. Multiple access points are foreseen to guarantee complainants having adequate 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.

The company procedure of Annex C on Grievance Mechanism was recently updated to

include, among other things, a specific categorization of grievance with significant implications of potential/real 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 employees, facilities, assets and operations.

In the case of grievances assessed as highly significant, the process of assessment and management of the grievance at local level 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 principles.

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 possible violations of human rights.



## ***C. Country Implementation***

### ***Overview of country operations selected for reporting***

In line with its commitment on respect for human rights, Eni carries out assessments on its potential and actual environmental, social, health and human rights impacts with the aim of preventing and mitigating adverse impacts. Consistent with this approach and aware of the importance of considering human rights at the outset of planning activities, in 2019 Eni carried out three Human Rights Impact Assessments in its most challenging new projects from a human rights point of view in Mozambique, in Angola and in Mexico. The HRIAs relied on the methodology and expertise of 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. When needed, focus groups are also held to allow the participation of vulnerable groups, while local NGOs, international organizations, Business Partners and suppliers are engaged through meetings and interviews.

The results of the HRIA were finalized in a Report with recommendations authored by the Danish Institute for Human Rights, followed by a dedicated action plan by Eni to allow an effective and monitored implementation of each action. If needed, recommendations and actions could be applicable to 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. Human Rights Action Plans have been implemented in the last year and are about to be concluded in 2022. The final reports with the update on the activities and measures undertaken in 2021 are being elaborated and will be published on the Eni website.

With specific focus to Mozambique, as a result of the HRA, the DIHR produced a report including key observations and recommendations to be



implemented in the project by Eni Rovuma Basin, a company owned by Eni is the delegated operator for the development of Coral South FLNG Project and Upstream operations of the Rovuma LNG project.

To address DIHR recommendations, ERB, jointly with Eni, developed an Action Plan (HRAP) for the period 2019-2022, approved in September 2019. Recommendations coming from the HRAP are grouped into the main areas of Eni's Human Rights Salient Issues (i.e. Communities, Security, Labor, Supply chain). The HRAP is under finalization.

As mentioned, the activity of human rights assessment/analysis on specific projects kept to be conducted also in 2021: on a prioritization/risk-based approach, last year two HRIAs have been conducted in Angola and Albania and two HRRAs have been conducted in Oman and Sharjah Emirates (UAE). For each study a specific human rights action plan is being finalized by the subsidiary with the support of the Eni central functions and the activities will be implemented in the course of 2022. The activities and measures included in the action plans addresses issues such working conditions, stakeholder engagement, grievance mechanism and security activities.

***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***

In accordance with the provisions of "Security Management System Guideline", the procurement process for security goods and services - including the selection of private security providers - 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.

Further information on contractual agreement with private security providers are described in more detail in Section A *“Successes and challenges of the use of the Model Clauses in agreements with public and private security”*.

***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)***

Eni has developed a Training Program on Security & Human Rights attended by Security Managers, as well as public and private security forces, both in Italy and abroad.

The main goal of these training activities is to sensitize and promote human rights in contexts where their violation is widespread. In particular, these courses are aimed at highlighting: i) Eni’s commitment to protection and promotion of human rights; ii) awareness of issues related to respect for human rights; iii) potential problems arising from violation of human rights in security activities; iv) the role that companies and private/public organizations could play in ensuring more effective protection of human rights; v) the constraints imposed on signatory governments by international human rights conventions.

Where possible, Eni has also invited civil society organizations to take an active part in the open training sessions (for instance, in Mexico, Mozambique and Kenya).

The above mentioned training projects has been running since 2009 and has been realized, until today, with training sessions in Mexico (2021), Angola (2020), Pakistan and Nigeria (2019), Tunisia (2018), Nigeria (2017), Venezuela and Ecuador (2016), Kenya (2015), Mozambique (2014), Indonesia and Algeria (2013), the Republic of Congo and Angola (2012),





Pakistan and Iraq (2011), Egypt and Nigeria (2010) and in Eni's offices in Rome and San Donato Milanese (2009).

Eni's training program on Security and Human Rights has been recognized as a best practice in "Responsible businesses advancing peace", the joint publication between the United Nations Global Compact and Principles for Responsible Investment (PRI).

The most recent training courses on Security and Human Rights was held on November 25<sup>th</sup> 2021, in an innovative way in a high risk subsidiary (Mexico - Villahermosa and Mexico City). This subsidiary was identified according to a 2021 Risk based Model.

Over 200 participants took part in the event, some of which physically present in Villahermosa and Mexico City and others connected remotely. In particular, physically present were: leaders of the Armed Forces (Special Forces of the Army, Navy), leaders of the Mexican Police and representatives of other energy companies operating in Mexico, personnel of the security companies operating at the Eni Mexico sites.

The trainer (a collaborator of Safestainable, a Swiss consulting company operating in the field of implementing policies for sustainable development) was video connected from Sao Paulo in Brazil. Due to the pandemic Security and Human Rights training courses were completely refurbished; instead of an on-site training course, Eni's provider organized "Virtual Instructor-Led Trainings".



## 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*

Through the lessons learned in previous years (e.g. understanding the necessary commitment requested in Voluntary Principles Initiative admission, undertaking a Verification Presentation, abiding by an Implementation Plan and deploying the developing actions) and through the efforts Eni made in improving its commitment to the Voluntary Principles, the following initiatives related to the Voluntary Principles in 2022 resulted:

- 1) **Launch of Conflict Analysis Tool:** Eni is going to approach the Tool and over the year it will provide VPI with work in progress reports on the next implementation in the chosen Country;
- 2) **Implementation of requested actions and new challenges:** Eni strives to improve Eni's participation to the Corporate Pillar meetings and to the activities of the Initiative.



## E. Engaged Company progress on implementation

### *Engaged Company's progress report on the Roles and Responsibilities of Companies*

Eni noted improvements on the Roles and Responsibilities of the Companies document.

Regarding **General good practice**, Eni abided by Governance Rules and attended Annual Plenary Meetings; Eni intends to enhance its involvement in VPIs activities, confirming its engagement. Transparency and dialogue are pillars in Eni conduct as well. About the latter, Eni intends to improve its efforts accordingly to its role in VPI.

Eni endeavored to improve its **Implementation** monitoring security-related incidents with human rights implications by public security forces by means of a new Risk Based Model Indicator. This Indicator measures the risk of business complicity in human rights violation committed by private and/or public security forces.

About **Promotion**, Eni increased statements on its commitment to Voluntary Principles. Eni maximized employee awareness of Voluntary Principles through workshops and VPI-related info dissemination. Finally, Eni strives to promote the Voluntary Principles in relationship with communities.



### ***Engaged Company's use of Voluntary Principles tools***

As mentioned in Eni Voluntary Principles Implementation Plan, after receiving the Tool from Secretariat of VPI, Eni Security Department analysed and internally shared the content of the “Conflict Analysis and Impact Tool” with Eni Sustainability Department and with Eni Management.

In order to be able to explain the content of the Tool in the best way, a PowerPoint presentation was drawn-up, which was shared during the meetings dedicated to this topic.

Last December another internal meeting was held, which has been followed by your in-depth analysis that took place, as agreed, in January 2022.

Here below, the introductory slide of the PowerPoint presentation shown to Eni's Management, in order to explain the Tool.

