



Registered office,  
Piazzale Enrico Mattei, 1  
00144 Roma  
Tel. +39 06 59821  
eni.com

**ENI S.p.A.**

**ANNUAL REPORT ON  
VOLUNTARY PRINCIPLES ON SECURITY  
AND HUMAN RIGHTS 2022**

**Eni SpA**

Company share capital Euro 4,005,358,876.00 full paid up  
Rome Company Register,  
Tax Identification Number 00484960588  
VAT number 00905811006,  
R.E.A. Rome n. 756453  
Branches:  
Via Emilia, 1 and Piazza Ezio Vanoni, 1  
20097 San Donato Milanese (Milan) - Italy



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## ***Introduction***

*“Our commitment to safeguarding human rights, which places people at the centre and recognises the diversity of the other as a resource, must be the foundation of our daily activity”*

Claudio Descalzi, CEO of Eni

For Eni, respect for the dignity of every human being is the basis of our own work, our culture and an integral part of an inclusive energy transition. Our approach is based on the company's responsibility in contributing to the development and well-being of people and communities. 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.

This report describes the activities and efforts Eni made in 2022 to implement the Voluntary Principles on Security and Human Rights and to carry out the process that led to its appointment as a member of the Initiative.



## ***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***

Public Statements of commitment or endorsement of the Voluntary Principles are embedded in copious Eni's key documents:

**Eni Code of Ethics**<sup>1</sup> 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. The Code of Ethics prohibits all forms of forced and/or child labour and enunciates Eni's commitment to defining and disseminating policies, standards and rules that guide the actions of its suppliers and partners towards respecting human rights and its principles of sustainability. The Code of Ethics 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 it is mandatory for all of them.

To make sure Eni supports people in correctly and effectively understanding the contents of the Code, the Eni Code of Ethics mailbox has been opened, through which clarification on 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).

Further, to help all Eni's people to fully understand this paramount document, Eni Code of Ethics is available in **12 languages**.

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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);



Moreover, 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 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.

**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 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. In line with the Eni’s approach of continuous improvement on its respect for human rights and with the aim of ensuring the alignment of Eni’s framework with international standards, the Eni’s commitments are constantly monitored and an update is currently in process.

Eni’s commitment on Voluntary Principles is also included within the **Eni’s Supplier Code of Conduct**, adopted in 2020, which sets specific expectations

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



on respect for human rights and represents a key reference for all suppliers and business partners in the relations with Eni.

These commitments are also reflected in our annual reports, such as **“The Consolidated Disclosure of Non-Financial Information”**, **“Eni For”** and **“Eni for Human Rights”**, the latter representing 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.

Another fundamental Eni’s public document that expressly refers to the Voluntary Principles is **“Eni Slavery and Human Trafficking Statement 2022”**, 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, in compliance with the British regulation (Modern Slavery Act 2015) and the Australian regulation (Modern Slavery Act 2018). This regulation is updated every year. In the 2022 version there is an entire paragraph dedicated to the Voluntary Principles and to the activities that Eni carried out during the year to implement them.

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 provided<sup>3</sup>, and also on **“Workplace”**, an online platform dedicated to Eni’s internal communication and sharing. 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.

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



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

The commitment to the Voluntary Principles was reaffirmed and strengthened by Eni Security, in the opening of the 2022 Workshop on Security & Human Rights held in Nigeria: *“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, a multi-stakeholder initiative dedicated to ensuring human rights in security operations”*.

Moreover, in the occasion of the 2022 World Human Rights Day, December 10, Eni's Head of Sustainable Development, Alberto Piatti, celebrates the event with the following words<sup>4</sup>:

*“Wherever we are present, guaranteeing respect for and promotion of human rights is the foundation of Eni's culture and an integral part of the company's commitment to be a protagonist of an inclusive energy transition”*.

The occurrence was also highlighted by Walter Rizzi, Chairman of Gela Biorefinery. His speech was displayed on MyEni<sup>5</sup>, alongside with the Head of Sustainable Development quote and shares a tangible experience of Eni's commitment to respect human rights and for a fair and just transition.

Eni's management commitment to Voluntary Principles and human rights is further strengthened and 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,

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<sup>4</sup> [https://myeni.eni.com/en\\_IT/news/2022/12\\_06/eni\\_for\\_human\\_rights\\_2022\\_eng.html](https://myeni.eni.com/en_IT/news/2022/12_06/eni_for_human_rights_2022_eng.html)

<sup>5</sup> [https://myeni.eni.com/en\\_IT/news/2022/12\\_06/eni\\_for\\_human\\_rights\\_2022\\_eng.html](https://myeni.eni.com/en_IT/news/2022/12_06/eni_for_human_rights_2022_eng.html)



Vice Presidents, Global Heads or Managing Directors, Commercial Managers of Eni subsidiaries, etc.). In 2022 and also in 2023, Human Rights-related objectives, including the activities carried out to implement the Principles, have been assigned to Eni's management working in Security Department, Sustainability Department and also in Public Affairs Management.

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. 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. In 2022, such process has been strengthened by assigning specific objectives related to the conduction of human rights impact assessments in Agri-feedstock projects.

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.

#### *Engagement in the VPI*

During the 2022 Eni was committed to reach all the goals set by the Voluntary Principles Initiative and faced several challenges on the way to the VPI Full Membership.

In the end of 2021, Eni has been asked to pilot a VPI Project, the **Conflict Analysis Tool**, developed by a Conflict Working Group internal to the VPI. The first months of 2022 were spent by Eni Security Dept. to analyse the Tool and to define the criteria to implement the project. Starting from a Country of which Eni has acquired a sound knowledge over the years, a series of book references, articles and hyperlinks on Nigeria conflict were collected in order to build a bibliography on the topic, also from a social and economic point



of view. To draft the project and define the milestones, a background research on Nigeria conflict was conducted and an analysis of the info and data collected was carried out according to the methodology and objectives of the Tool.

In the first quarter, Eni issued the **Second Progress Report of the Implementation Plan** that VPI had assigned in 2021. It contained the discussion on the successes and challenges of the use of the model clauses in agreements with public and private security and the illustration on how Eni enhanced monitoring capacity through the introduction of a new type of Security event, “Human Rights Violation”.

In the meanwhile, Eni submitted its full **Annual Report** as Engaged Corporate Participant.

In May, Eni Security management (Global Head of Security and Compliance & Governance unit) joined the **Annual Plenary Meeting** in Toronto for its first in person-event in the Voluntary Principles experience. In this occasion Eni was heard about its projects aimed to develop the Conflict Analysis Tool and Nigeria was formally announced as the country chosen for the project implementation.

In July Security dept. personnel travelled to Nigeria to gather evidence through interviews and focus group discussions.

In October a **Conflict Analysis Tool** and a **Revised Annual Report** were submitted to the Secretariat, followed by a meeting with the Secretariat itself and including a Conflict Analysis Tool content explanation and a Revised Annual Report supplementing parts illustration.

All through the year Eni joined several **Corporate Pillar Meetings** in its role of Engaged Corporate Participant and Eni had an active participation in the survey and interviews preceding the **Strategic Review** authored by Avanzar. The end of the year was characterized by preparing the actions provided for in the Conflict Analysis Tool as mitigation options for the conflict (Inductions and Gender Rights Action Plan) and the **Eni VPI Full Membership** was finally announced.



### Transparency

Every year Eni publishes its sustainability report - Eni For - 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 update is under elaboration and will provide information of human rights activities and performances conducted in the course of the 2022 (publication expected for July 2023).

### ***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

Coherently 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 2022.

As a result of its commitment and work on human rights, on November 2020 (last benchmark conducted) 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<sup>6</sup>. 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.

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

The efforts of the company with civil society organizations and NGOs, also considering security and human rights issues, are proved in Nigeria where Eni is undertaking 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 Working Group on Business & Human Rights within the Project "Business in conflict and post-conflict contexts".

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<sup>6</sup> <https://www.eni.com/en-IT/media/press-release/2020/11/eni-ranked-top-by-corporate-human-rights-benchmark.html>



The project has the aim of increasing awareness of the risk associated with the potential pollution from oil spills and providing human rights training to bring communities into developing sustainable agricultural practices. Within the project it has been conducted: awareness campaigns on human rights to disseminate knowledge on human rights tools and legislation; involvement in media campaigns on the risks related to pollution deriving from oil spills; communities' sensitization on the issue and processes of child protection and monitoring of people's food safety. About 70 rural communities in the state of Bayelsa have been involved so far, for a total of more than 40.000 beneficiaries. The project is still ongoing.



## ***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*

Eni Regulatory System represents the set of regulatory instruments that define for Eni SpA and its subsidiaries the reference models for ethical, compliance and corporate governance issues, as well as corporate processes and related operating methods. In line with the requirements of our new business model, on 26 January 2023 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, thus endowing our company with a more usable and flexible management system with leaner operational processes and which is also effective and efficient in identifying and managing business risks. 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 2022);
- 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.

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 IMPRESSO (Responsible and Sustainable Enterprise), the Management System Guideline of Eni which regulates the activities of Eni’s Sustainable Development department.

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 (UNGPs) 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 has adopted an 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 processes both at entity and process level and which identifies specific areas of risk linked to Eni’s salient issues, including security and human rights. In this regard, the Eni’s regulatory framework – and MSG IMPRESSO as well - are currently undergoing a process of update.



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 – is structured in line with the relevant international standards, is risk-based and it 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. Eni's human rights due diligence model aligns with the UNGPs and the OECD Guidelines; it is designed to be multidisciplinary, multilevel, and integrated at any level of the company's processes. It follows a risk-based approach to identify, prevent, mitigate, and account for adverse corporate impacts on human rights. The risks identified through due diligence are defined as risks to rights-holders, extending the traditional company's risk management perspective.

The due diligence system is structured at central level and around the specific functions of Human Resources, Security, Procurement and Sustainability that carry out human rights due diligence according to the salient human rights issues and the due diligence on industrial projects.

On the first ones, the aforementioned functions primarily interested in managing human rights due to the process managed are dedicated to the following issues: 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 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



(HRRRA) in case of medium-risk project. In both cases, a Human Rights Action Plan is defined based on the findings.

Even in 2022 Eni has implemented the **“Security and Human Rights Risk Based Model”** by updating the underlying data and indicators. As we had the chance to explain in 2021, 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”<sup>7</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, 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..).

We recall the definition of the scope regarding the “Security Forces” we used last year:

*“The definition of ‘security forces’ for the purposes of this Index includes, besides public security services and private security contractors, all officers of the law, whether appointed or elected, who exercise police functions,*

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<sup>7</sup> 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).



*especially the powers of arrest or detention; and armed forces (military), whether public or private.*

*Public security providers include international armed forces (e.g. UN forces); national armed forces; national security services (e.g. internal intelligence agencies); national and local paramilitary forces; and local, citizen-based security groups (e.g. town guards, militias, self-defense groups). The role of public security forces is to provide effective protection to the civilian population against human rights violations, while acting within the law and under the control of the civil authority<sup>8</sup>.*

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.

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<sup>8</sup> Verisk Maplecroft – Security Forces and Human Rights – Definition – Definition of the Issue.



We attach below the 2022 Risk Based Model, focusing on the first ten Countries resulting from the implementation of the Model itself.

Nations	CONTEXT					ENI PRESENCE					Ranking	"Security & Human Rights" workshop year	Priority
	"Human Rights" Threat	Max Threat	Sites	On force Personnel	50 scores								
					"Human Rights" Indicator	"Max Threat" Indicator	Security Forces and Human Rights	"On Force Personnel" Indicator	"Armed Surveillance" Presence	"Business" Indicator			
NIGERIA	7	7,26	21	2452	20	20	10	10	20	20	100	2022	1
LIBYA	8	7,74	1	130	20	20	10	7	20	20	97	0	2
IRAQ	7	7,71	2	195	20	20	10	7	20	20	97	2011	3
MOZAMBIQUE	7	6,18	3	181	20	20	10	7	20	20	97	2014	4
ECUADOR	6	6,16	7	403	20	20	7	10	20	20	97	2016	5
ALGERIA	7	5,24	2	105	20	20	7	7	20	20	94	2013	6
EGYPT	8	5,76	5	399	20	20	10	10	10	20	90	2010	7
TURKMENISTAN	9	4,65	2	902	20	20	7	10	10	20	87	0	8
CONGO	7	4,79	15	551	20	20	7	10	10	20	87	2012	9
TUNISIA	6	5,88	16	455	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 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.

Grievance received in 2022 through Eni's mechanism are about 140. Details about issues raised and their resolution will be published in Eni for 2022.

The company procedure on Grievance Mechanism was recently updated to include, among other things, 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 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 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 potential claims with human rights implications.



## ***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.

The HRIAs rely 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 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.

Consistent with this approach and aware of the importance of considering human rights at the outset of planning activities, in 2022 these investigations were conducted on the Agri-feedstock projects implemented in Congo and Kenya, identifying recommendations aimed at mitigating potential adverse impacts, also by engaging more than 1,000 people from local communities in surveys and meetings, as well as NGOs, Trade Unions representatives and other Institutional stakeholders. Such recommendations will be addressed in specific Action Plans to be implemented in 2023. Furthermore, a follow up assessment has been conducted in Mexico, to appraise the progresses and the effectiveness of the activities realized within the Human Rights Action Plan between 2019 and 2021.



During the year, the Action Plans for the 2021 assessments were also implemented: at Cabinda Centro in Angola, Block 47 in Oman, the Dumre Block in Albania and Area C of the Sharjah Emirate (UAE).

Furthermore, in 2022 Eni in Mozambique has participated to the activities of “National Working Group on Voluntary Principles on Security and Human Rights” under establishment. ERB (Eni Rovuma Basin) has indeed took part, jointly with the members of the Government, Civil Society and Company peers to the meetings held over the year.

### ***Engagements with stakeholders on country implementation***

The most intriguing experience with stakeholders in 2022 was the collection of interviews Eni Security gathered from more than thirty representatives of Nigerian society, members of local communities and other local actors.

The main stakeholders Eni listened to were Men-on-the-street, Kings and Paramount Leaders, Ombudsmen, Human Rights Activists and clerical representatives, Army and Air Force High Officials, Contractors, Risk Advisors, Public Official from Ministries, Former combatants in local armed bands.

This activity allowed Eni to further understand Nigerian culture and mindset. The activity was organized on several days of interviews in different sites (Abuja, Port Harcourt, Ogba land kingdom), trying to divide the interviewees in different clusters, according also to Conflict Analysis Tool Potential Key Actors.

Professionals (Ombudsmen, Public Officials from Ministries, Risk Advisors, Contractors) represented 35% of the interviews; Government and Ethnic Groups 25%; Human Rights (HR Activists) 17%; Business (Eni personnel) 13%; Women and Vulnerable Groups 10%.

As for the methodology applied by Eni in this process, after having duly informed each interviewee, every interview was recorded; it was analysed,



transcribing the most relevant ideas, opinions and concepts arose during the event and they were finally summarized in the paper Eni issued in the last 2022 quarter.

A particular focus was on the jargon, style and tone the interviewees used, depending on the background, job, culture of every man and woman asked for the discussion. The interviewers made an effort to capture any nuance and hint the conversation could give, trying to add value and contextualize any speech.

On this regard, the local Eni employees were a great support for the outcome.

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.

It's worth to mention the peculiar structure of Nigerian society, organized in ethnic groups and communities led by leaders and chiefs with different levels of power. Behaviour and thinking of Nigerian people are deeply influenced by these main variables (ethnic belonging, rank in community hierarchy) that might considerably affect decisions.

Of course, any opinion was fully respected and no one was induced or forced to talk about topics they didn't want to deal with.



***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. 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, 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.

Worthy of mention is the inclusion in the contractual clause of the obligation for the contractor to comply with the US Global Magnitsky Act, enacted in 2016. According to this new 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. The story of the Russian tax lawyer Sergei Magnitsky, who died in prison in 2009 (according to Moscow Helsinki Group was deliberately killed), was an ominous warning of the importance of Human Rights and of the contempt with which they can be trodden on despite international attention and monitoring.

*In 2012, US Congress passed the Sergei Magnitsky Act to require the US President to identify and impose sanctions on any person determined to have been involved in the detention, abuse, or death of Magnitsky; the ensuing cover-up; or the alleged criminal conspiracy that Magnitsky had uncovered. More broadly, the law requires the President to identify any person determined to be responsible for gross violations of human rights against individuals either seeking to (1) expose illegal activity by officials of the Russian government or (2) to “obtain, exercise, defend, or promote internationally recognized human rights and freedoms” within Russia. The Global Magnitsky Human Rights Accountability Act, enacted on December 23, 2016, authorizes the US President to impose economic sanctions on, and deny entry into the United States to, foreign individuals or entities identified as engaging in human rights violations or corruption<sup>9</sup>.*

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<sup>9</sup> US Congressional Research Service, December 3, 2021.



**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**”, held from 9 to 11 November 2022 at the subsidiary NAOC (Nigerian Agip Oil Company Ltd), in Port Harcourt, Nigeria. The initiative was conducted by an independent consultancy company, specialized in security management and human rights promotion. This workshop involved more than 400 participants (Nigerian armed forces, private security forces and NAOC and

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<https://sgp.fas.org/crs/row/R46981.pdf>



NAE employees). In 2022 the daily schedule included also practical exercises that involved most of the Security Forces; after years of online training due to covid outbreak, eventually the agenda was enriched with outdoor activities that had the huge value of restored human relationship. A part of this workshop is specially dedicated to the explanation of the Voluntary Principles on Security and Human Rights.

The initiative is part of the training project launched in 2009 to promote corporate best practices that incorporate the international principles established by the United Nations in the Universal Declaration of Human Rights and referred to in the Voluntary Principles Initiative which underlie Eni's statement on respect for human rights in all the Countries in which the company operates. The above-mentioned Program has been running since 2009 with the participation of Security provider, in Italy and globally, and will continue to involve Countries in which Eni operates. Training sessions have been held in 15 Countries in last 13 years.





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 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.

This year, more than 14,000 hours of training were provided among staff and middle and top managers on the human rights program. Furthermore, in 2022 Eni collaborated with the IPIECA and the Building Responsibly Initiative to develop, test and review a training course for contractors and suppliers on labour rights, including modern slavery risk, associated with the construction of large projects. The training course was developed with 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 2022 reporting year Eni undertook the implementation of the Conflict Analysis Tool the Initiative assigned to it. Through the amount of work it dealt with, Eni learned a series of lessons in upgrading the VPSHR implementation.

**Firstly**, Eni Security Headquarter learned **how important is gathering information and grabbing hints and nuances on the field**, collecting data apt to operate in the most proper way in subsidiaries where conflict is present. Keeping in touch with local management has always been a best practice for Eni Security team, but renovating these links by a presence on the field is a habit not to forget.

**Secondly**, Eni learned **the importance of building a ready-to-use tool that enables a multilevel application in different contexts**. This document proved to be an invaluable mean to delve into a country's background and its inner causes of conflict.

Ideally, the tool is suitable for being annually updated in Countries where is already implemented and for being applied for the first time in other countries where a conflict is on.

**Thirdly**, another lesson learned regards **the actions following the Conflict Analysis Tool implementation. Focusing on the mitigation options** supports the company in planning activities apt to alleviate a tensed situation. This



methodology allows spotting potential risks which may be very hard to be identified by company processes.

Furthermore, 2022 brought to Eni other learnings. To name but a few, the Nigerian experience gave the chance to acquire **a deeper understanding of Eni subsidiaries backdrop** in terms of issues, opportunities and Human Rights training needs.

Eni's Work Plan for 2023 was drafted on the basis of this evidence (see below).

Eventually, in 2022 Eni had the chance to have a first-hand experience in Voluntary Principles Initiative Annual Plenary Meeting, in Toronto.

The dialogue with the Voluntary Principles Secretariat, Human Rights leading players and VPI members was fruitful and extremely rewarding for our Security Dept.

#### *New initiatives and programs related to the Voluntary Principles in 2023*

The 2022 activities led to several projects implementation and the framework of 2023 programs is very clear for Eni.

The main initiatives are the implementation of the **Mitigation Options related to the Conflict Analysis Tool** (Gender Rights Action Plan and Inductions) to put in place in Nigeria sites. The owner of the task will be Eni Security Headquarters with the support of local Security Managers. The recipients of this activity, consisting in sensitizing on Security and Human Rights by providing training and info also on Women Empowerment Principles and gender equality, will be local employees and guard forces.

Furthermore, Eni is constantly working on an **Updating of the Conflict Analysis Tool**, consisting in promoting and supporting raise awareness activities in communities about laws and human rights instruments that bind local players and raise awareness activities on hazards of oil pollution and related rights to a clean environment.



Also, Eni will carry on **its involvement to the National Working Group on Voluntary Principles on Security and Human Rights in Mozambique** by actively participating to the future meetings and initiatives of the Group.

Lastly, in 2023 Eni aims to accomplish tasks like:

- 1) **Workshop on Security and Human Rights**, to set in one of the Subsidiaries most at risk and led by an external provider;
- 2) Events on **main Principles on Security & Human Rights** aimed to spread more and more Security and Human Rights sensitivity where it is most needed, to set in the Subsidiaries' sites most at risk and led by local Security Managers.