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**ENI S.p.A.**

**ANNUAL REPORT ON  
VOLUNTARY PRINCIPLES ON SECURITY  
AND HUMAN RIGHTS 2024**

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## **Introduction**

*“Eni is firmly committed in safeguarding the health and safety of people and the integrity of its assets, and also protecting the environment, biodiversity and water resources. Furthermore, a commitment to **respect human rights** underpins our activities: our Code of Ethics and the new Policy “Respect for Human Rights at Eni” explicitly state this, and we demand the same promotion and protection from all the stakeholders with whom we maintain relations”.*

Claudio Descalzi, CEO of Eni  
“Eni For - A Just Transition” 2023



As in previous years, in 2024 Eni undertook many challenges in order not only to prove its commitment to the defense and promotion of Human Rights, but also to provide an effective impact on the field whenever an intervention is needed.

This document intends to give a clear picture of the work done in 2024.



## ***A. Commitment to the Voluntary Principles***

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

### **Public statement of commitment or endorsement of the Voluntary Principles**

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

**Eni Code of Ethics<sup>1</sup>** is the tenet in the Human Rights regulatory framework and describes Eni's value system and its commitment to respect people's rights, also through the adoption of rights-holders' perspective. It sets out the central values that guide Eni's actions:

Integrity;  
Respect and protection of Human Rights;  
Transparency;  
Development promotion;  
Operational excellence;  
Innovation;  
Team work and collaboration.

It contains effective rules of behavior so that the principles contained therein form a practical guide for corporate operations. As set out in its Code of Ethics, Eni is committed to ensuring a work environment that is free from any form of discrimination or abuse and to establishing work relations that are characterized by fairness, equality, non-discrimination, focus and respect for

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<sup>1</sup><https://www.eni.com/en-IT/governance/rules/code-of-ethics.html>;



the dignity of the individual. The Code of Ethics also refers to the compliance with Voluntary Principles on Security and Human Rights within the first commitments of the document and refers to the respect for human rights in the adoption of security measures.

A specific commitment in the Eni Code of Ethics refers to the provision of a **whistleblowing process** which allows anyone, employees or third parties, to report problems relating to the internal control system or violation of the Code of Ethics with transparent information on the process and guarantee of confidentiality and non-retaliation. To make sure Eni supports people in correctly and effectively understanding the contents of the Code, the Eni Code of Ethics mailbox has been opened, through which clarification on the content of the Code can be sought. This does not affect the reporting of potential breaches, which continues to be dealt with through the Whistleblowing reports channel (see below).

To disseminate its content a **training program** is developed and broadcasted among all Eni's employees and it is mandatory for all of them, and to help all Eni's people to fully understand this paramount document, the Code of Ethics is available in **12 languages**.



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## CODE OF ETHICS

### Our mission

We are an energy company. We concretely support a just energy transition, with the objective of preserving our planet and promoting an efficient and sustainable access to energy for all.

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**CODE OF ETHICS**

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**CODE OF ETHICS**

Zero Tolerance Policy

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Policy Diritti Umani

The Code 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.

As usual, Senior Management have been the main supporters and testimonials of Eni Code of Ethics by means of videos and statements.

The key document where the terms of Eni's commitment are set out is **2023 Eni's ECG Policy "Respect for Human Rights in Eni"**. This document renews the company's commitment in this area and lays a foundation for updating and strengthening the company's management model, aiming at guaranteeing the implementation of the due diligence process regarding human rights according





to the UN Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises, also considering future European regulatory developments in this regard.<sup>2</sup>

The specific areas of commitments are based on the Salient issues and in alignment with the prioritization approach defined by the UN Guiding Principles and the OCED Guidelines. Salient issues represent the most significant issues for Eni, identified considering the business activities conducted, the operating contexts and the point of view of local and international stakeholders, while adopting a risk-based and compliance approach.

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

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

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



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

Eni's approach to Diversity & Inclusion (D&I) is based on the fundamental principles of non-discrimination, equal opportunities and inclusion of all forms of diversity, as well as the integration and balance of work with the personal and family needs of Eni's people. Eni's focus on an inclusive culture is stated in the corporate mission, in the regulatory framework and in many company documents. In 2023, Eni's first D&I Policy was issued, which is part of the Ethics, Compliance and Governance (ECG) Policy of Eni's new regulatory system. The D&I Policy, the basic outline of which was approved by the Board of Directors on October 26, 2023, includes the D&I model, reference principles and commitments undertaken by Eni in its activities in Italy and abroad.

Eni's human rights commitments is also included in the **"Zero Tolerance against violence and harassment in the workplace"** regulatory instrument, which was issued in 2021, and in 2023 subsequently issued as Policy, consistent with the overall evolution of Eni's regulatory system. The Zero Tolerance Policy, in accordance with the principles of the Geneva Convention of the International Labor Organization, defines a broad perimeter of types of harassment that allows us to identify misconduct and behavior that should not be engaged in and should be reported. Eni wants to increasingly ensure a working environment free from violence and harassment of any form, where we can all feel protected and free to express ourselves.

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

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

*"In particular, recognizing that the security and protection of people and corporate assets are fundamental needs to be reconciled with the need to*



*respect human rights, Eni adopts and recalls - also in relations with both public and private security forces - the "Voluntary Principles on Security and Human Rights" (VPSHR), a collection of principles drawn up by the Voluntary Principles Initiative to offer oil and mining companies a valid practical reference for balancing security needs with those relating to respect for and protection of human rights".*

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

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

Among others company documents, Eni's commitment on Voluntary Principles is also included within the **Eni's Supplier Code of Conduct**, which sets specific expectations on respect for human rights and represents a key reference for all suppliers and business partners in the relations with Eni. It establishes the mutual commitment to recognize and protect the value of all the people, commitment to contrasting climate change and their effects, operating with integrity, protecting company resources, promoting the adoption of these principles within their own people and supply chain. Among these principles, regarding human rights and work, the reference is the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, but also to the United Nations Guiding Principles on Business and Human Rights (UNGP), the OECD Guidelines for Multinational Enterprises and Voluntary Principles on Security & Human Rights. All suppliers will be asked to sign the Code and to promote the principles contained in it along their supply chain. These commitments are also embedded in Eni's annual reports, such as the **"Consolidated Disclosure of Non-Financial Information"** (starting from 2024



issue called **“Sustainability Report”**), **“Eni For”** and **“Eni for Human Rights”**. The latter represents a dedicated report on Eni’s activities and performances on human rights.

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

In the **“Sustainability Report”** human rights-related Key Performance Indicators (KPI) are illustrated.

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

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

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



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

Keeping a focus to the international legal framework and in compliance with the British regulation (Modern Slavery Act 2015) and the Australian regulation (Modern Slavery Act 2018), another fundamental Eni's public document that expressly refers to the Voluntary Principles is **"Eni Slavery and Human Trafficking Statement"**, 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. The statement is updated every year.

Another action is focused on the Multi-stakeholder Initiatives and describes the activities Eni carried out in 2024: the drafting of the Annual Report. Other examples of the engagement in the Voluntary Principles Initiative are the organization and application for the VPI of the **"Conflict Analysis Tool" in Mozambique** and the development of the **training program on security and human rights in Mozambique**, in August 2024, addressed to field level and command security personnel.

In addition, Eni published its commitments on human rights and on Voluntary Principles on Security and Human Rights on its website, where a direct link to the Principles is provided<sup>3</sup>.

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

Eni's Board of Directors (BoD), who approved in 2023 the ECG Policy Respect for Human Rights and the ECG Policy Zero Tolerance against violence and harassment in the workplace, is involved in the monitoring of Human Rights, and in particular the Sustainability and Scenario Committee, to which the main updates made to the human rights management system and the activities carried out are presented every year.

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<sup>3</sup> <https://www.eni.com/en-IT/sustainability/people-community/human-rights.html>



Eni's management commitment to Voluntary Principles and human rights is further strengthened and supported by the management objectives. In 2024, Eni continued to assign incentives to management linked to human rights performance – including on security and human rights – assigning specific objectives to all managerial levels, including direct reports to the CEO, and continued a path of awareness and training through general learning courses dedicated to all Eni personnel, specific courses on topics and areas particularly exposed to risks of negative impacts, and practical workshops for suppliers on security and human rights issues.

Activities on human Rights and security are therefore included within the issues discussed within the Sustainability and Scenarios Committee (SSC). SSC and BoD are also involved in the annual approval of the Slavery and Human Trafficking Statement.

From the Security perspective, the commitment of the senior management to the Voluntary Principles was confirmed in 2024 **Workshop on Security & Human Rights, held in Maputo, Mozambique**. In front of a great range of stakeholders the value for Eni of the Voluntary Principles on Security and Human Rights was strenuously reaffirmed by Eni Rovuma Basin Managing Director. Moreover, the Head of Eni Global Security also said: *“The ethics of respecting rights assumes for Eni an unparalleled human and ethical value, which contributes significantly to increasing the reputation and credibility of our business but also that of all stakeholders as a whole”*.

Implementation of human rights and security commitments is well structured within the company and improved every year. As for the Global Head of Security, the 2024 human rights management objective was to strengthen the effort to sensitize mostly guards and officers on Human Rights issues in the Countries where the risk of human rights violations is highest. The objective was pursued through the following tools and projects.



### Engagement in the VPI

In 2024 Eni focused on all the actions bound to shore up VPI engagement: Conflict Analysis Tool implementation, Security & Human Rights Workshop set-up, joining VPI meetings and conceiving new ways to disseminate VPSHR awareness as well.

### **IN-COUNTRY WORKSHOPS ON SECURITY & HUMAN RIGHTS**

A new project launched in 2024: In-Country Workshops on Security & Human Rights, a kind of Workshop where local Security Managers play a major role undertaking a lean version of the annual Workshop on Security & Human Rights.

During 2024, the project was finalized, by the subsidiary's Security Managers, for the implementation of training workshops on human rights for local security forces, to increase the number of security forces trained, in addition to the traditional annual training course. The kick-off of the project was carried out in the 10 countries with the highest level of risk of human rights violations, defined by Eni's Risk Based Model 2023: Congo, Tunisia, Mexico, Ivory Coast, Kenya, Iraq, Nigeria, Libya, Algeria, Egypt; **716** people were involved, including Public and Private Security Forces.

### **CONFLICT ANALYSIS TOOL**

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

The final version of **the CAT implemented in Mozambique** was displayed in the first half of 2024, including all the interviews and Focus Discussions Groups (FDGs) outcomes.

### **SECURITY & HUMAN RIGHTS WORKSHOP**

In 2024, the "Security & Human Rights" Workshop was held in Mozambique, in Maputo, with the participation of senior Mozambican civilian and military officials, as well as representatives of international organizations and companies, and in Pemba, with specific training sessions, including



practical ones, involving both public security operators and private security operators working at Eni sites. The main objective was to promote human rights in security activities, sharing the fundamental principles on the use of force and weapons and preventing violence, with a focus on the protection of women. Particular attention was paid to respect for human dignity and diversity, which are essential for the protection of company assets in collaboration with local authorities. Overall, the workshop involved over **200** participants, including **153** from public and private security forces.

Regarding the **involvement of Eni in National Working Group on Voluntary Principles on Security and Human Rights (VPSHRs)**, in Mozambique in 2024 many high-level events and technical meetings (National and Provincial Working Group) took place. Eni Security joined the events, represented by the Eni Rovuma Basin Security Manager, along with others energy companies. Representatives from Governments, Commissions, Embassies, Ministers and from International Organizations and Civil Society were present.

All these meetings had the objective of discussing business, security and human rights challenges in the country (mostly, in Cabo Delgado) from the perspective of the private sector, government agencies, civil society organizations and many other actors and also of raising awareness about the Voluntary Principles and of promoting exchange on how Mozambique's membership of the VPI could advance security and human rights in the country.

Below a brief recap of the events.

**2024, January 22<sup>nd</sup>**, Cabo Delgado Provincial Working Group on Voluntary Principles on Security and Human Rights. The meeting was attended by private sector (Montepuez Ruby Mining), Government Agencies and Civil Society Organizations (among the others, CDD – Centre for Democracy and Human Rights). In the meeting was illustrated the current status of the





Republic of Mozambique's application to the Voluntary Principles Initiative (VPI).

**2024, January 30<sup>th</sup>**, National Working Group on the Voluntary Principles on Security and Human Rights. The meeting was enriched by the participation of Government Agencies (Ministry of Justice, Constitutional and Religious Affairs, Ministry of Defence and Ministry of the Interior) and private sector (Eni Rovuma Basin, TotalEnergies).

**2024, March 12<sup>th</sup>**, National Working Group on the Voluntary Principles on Security and Human Rights. The meeting was attended by DCAF - Geneva Centre for Security Sector Governance and ICoCA - International Code of Conduct for Private Security Providers.

**2024, March 14<sup>th</sup>**, Pemba, Cabo Delgado Provincial Working Group on Voluntary Principles on Security and Human Rights. 7th Meeting of the Cabo Delgado Technical Working Group. The aim of the meeting was monitoring the Security & Human Rights in the districts of Montepuez and Palma. From civil society organizations, Center for Democracy and Human Rights (CDD) chaired and moderated the meeting. In this occasion there were exchanges between members of the working group (Government Agencies, private sector representatives, civil society organizations, observers and cooperation partners) on the Voluntary Principles.

**2024, May 28<sup>th</sup>**, Pemba, Cabo Delgado Provincial Working Group on the Voluntary Principles on Security and Human Rights. 8th Meeting of the Cabo Delgado Technical Working Group. The focus was on the update about the entrance of Mozambique Government into the Voluntary Principles Initiative and on business and human rights on Cabo Delgado.

**2024, September 17<sup>th</sup>**, National Working Group on the Voluntary Principles on Security and Human Rights. The meeting was attended by Government agencies (Ministry of the Interior, Ministry of Justice, Constitutional and Religious Affairs), private sector (Eni Rovuma Basin, Gemfields), Civil society Organizations (CDD – Center for Democracy and Human Rights,



National Commission for Human Rights and Citizenship), cooperations partners and observers (British High Commission, Embassies of US, Netherlands and Switzerland). There was a recap of the VPI entry process of Mozambique Government, begun in March 2023. Angelo Paúnde (Ministry of Justice, Constitutional and Religious Affairs) detailed the key events of the process: working meetings held on Mozambique's candidacy, participation in the VPI plenary in London in June 2023, and the submission of the candidacy in September 2023. The focus was on the Nation Action Plan (NAP) and its developments with a broader vision on similar processes in Africa.

#### Transparency

The sustainability report - Eni For – is the yearly issue that describes the company's commitments in its Long-Term Strategic Plan - 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 2024 update is on its way and will provide information of human rights activities and performances conducted during the 2024 (publication expected for early summer 2025).

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

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

Code of Ethics



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

Among the activities to promote and advance VPs with its peers, there is the participation to the International Petroleum Industry Environmental Conservation Association (IPIECA) Responsible Security Task Force (RSTF): the discussions within the RSTF aimed at reinforcing the IPIECA community, exchanging best practices and challenges on Human Rights and Security and better implement the Voluntary Principles, through mutual discussions and reflections on future developments on the issue. In this regard, Eni has participated in the activities and meetings organized by the RSTF over the 2024.

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

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

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

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



## ***B. Policies, Procedures and related activities***

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

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

As mentioned in Section A, “**Ethics, Compliance and Governance (ECG) Policy on Respect for Human Rights in Eni**” deepens respect for the rights of individuals and local communities, with particular reference to biodiversity, environmental protection, “culturally sensitive” areas, the right to ownership and use of land and natural resources, the right to water and the highest achievable level of physical and mental health. Particular attention is paid to the rights of vulnerable groups with a focus on minors, national or ethnic, religious and linguistic minorities, people with disabilities, migrant workers and their families. Respect for the rights of women and girls in the communities is reaffirmed and for Indigenous People as well.

The Policy also includes a specific commitment to respect human rights in the context of security activities, aimed at protecting people and assets from any threat from third parties that could cause direct or indirect damage.

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



In 2024 as well, Eni carried on the update and review of the Company's Regulatory System. Therefore, also Security Regulatory System is currently under review.

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".

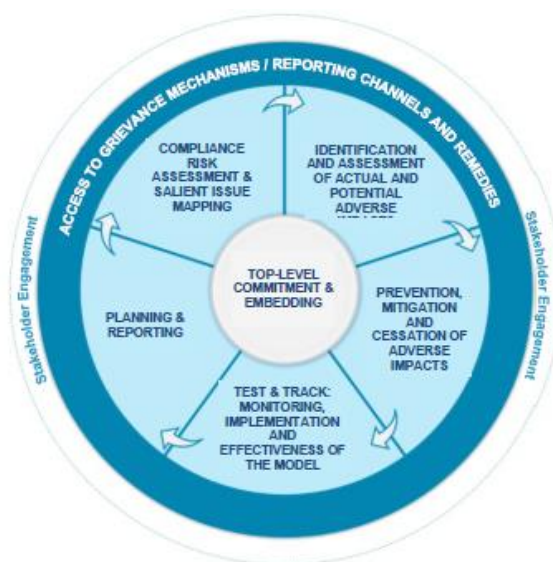
The implementation of Security and Human Rights items provided for by the Consolidated Text on Security Rules is carried out by means of the following actions:

- Implementation of the Due Diligence Model through the Risk Based Model (data and indicators updated in 2024);
- Recurring checks of Human Rights provisions (Model Clause) both in contracts with private Security providers and Memoranda of Understanding with public Security Forces;
- Training courses to public and private Security forces operating in Eni's sites.



## ***Risk Assessment***

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

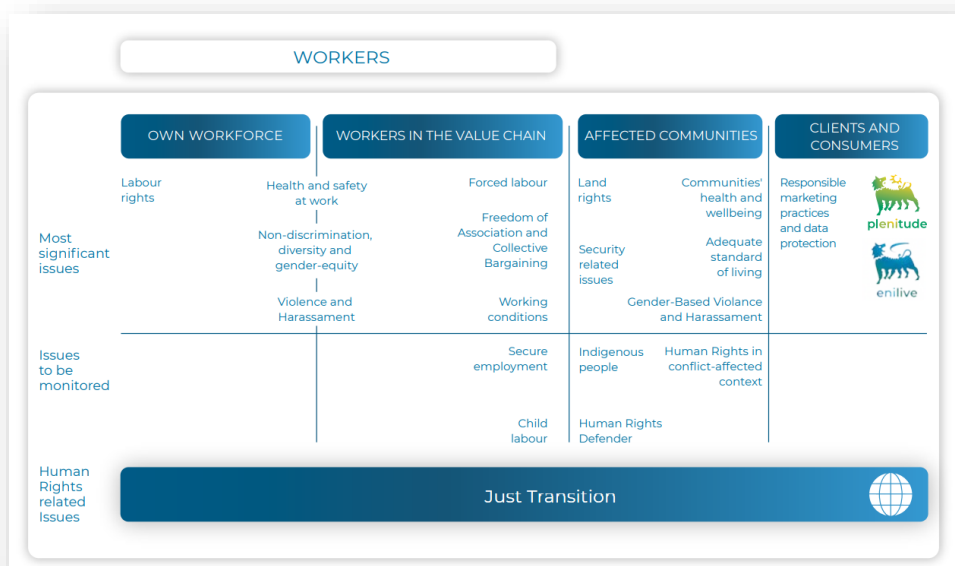


The **Eni's human rights due diligence** - the process of identifying, evaluating, preventing and managing the negative impacts on human rights that the company can produce, or contribute to produce, through its activities and business relationships – is structured in line with the relevant international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



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

**Eni Salient Issues**, identified for the first time in 2017, were updated in 2024, through the engagement of more than a hundred people from different Eni functions in dedicated workshops and through the engagement of some authoritative stakeholders. Following the analysis, 13 main issues were identified, divided between workers, communities and consumers, as well as five additional issues to be monitored as they are relevant in relation to specific business activities or specific operating context. To oversee the most significant issues, Eni has adopted risk-based models which make it possible to collect information on the operating context, evaluate them considering the specific activities carried out and business processes, seize potential risk elements and adopt appropriate prevention and management measures in consideration of the level of risk themselves.





Also for 2024 Eni has implemented the **“Security and Human Rights Risk Based Model”** by updating the underlying data and indicators. This model considers specific parameters, that are split into two clusters based on “Context elements” and “Eni presence in the area”.

In the first group there are Security Country Threat parameter and Human Rights Risk parameter (the risk of human rights is a component of the ethical threat). Both the Security Country Threat and Human Rights Risk are given by an external provider. In this first cluster there is the index named “Security Forces and Human Rights”<sup>5</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..).

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.

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<sup>5</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).





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 Eni's personnel in the country, presence of armed surveillance and a business parameter that measures the Country strategic significance for Eni.

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

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

We attach below the **2024 Risk Based Model**, focusing on the first ten Countries resulting from the implementation of the Model itself.

					CONTEXT			ENI PRESENCE					
					50 scores			50 scores					
Nation	"Human Rights" Threat	Max Threat	Sites	On Force Personnel	"Human Rights" Indicator	"Max Threat" Indicator	Security Forces and Human Rights	"On Force Personnel" Indicator	"Armed Surveillance" Presence	"Business Indicator"	Ranking	"Security & Human Rights" Workshop year	Priority
IRAQ	8,80	8,09	2	373	20	20	10	10	20	20	100	2023	1
LIBYA	8,90	8,42	1	145	20	20	10	7	20	20	97	0	2
ALGERIA	8,00	6,48	1	255	20	20	7	10	20	20	97	2013	3
MOZAMBIQUE	6,30	6,21	4	196	20	20	10	7	20	20	97	2024	4
NIGERIA	7,30	7,87	3	11	20	20	10	2	20	20	92	2022	5
EGYPT	8,00	6,16	6	399	20	20	10	10	10	20	90	2010	6
TURKMENISTAN	8,90	4,65	2	899	20	20	7	10	10	20	87	0	7
CONGO	8,30	6,15	16	549	20	20	7	10	10	20	87	2012	8
TUNISIA	6,00	5,92	4	291	20	20	7	10	10	20	87	2018	9
CÔTE D'IVOIRE	7,60	6,28	6	147	20	20	7	7	10	20	84	0	10



## ***Engagements with Security Forces***

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

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

The work in progress entails a retrofitting of ways of communication to Public Authorities about Human Rights violations by Public/Private Security Forces, involving also the main actors on the field and aiming to optimize the process.

### ***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 and provides instruction on both the design and implementation of such mechanisms and



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

The company procedure on **Grievance Mechanism** includes a specific categorization of grievance with significant implications of potential/current negative impacts on human rights and therefore considered of “High severity”.

Within this category of “high severity” are falling also potential grievances involving cases of violence, threats, aggression, intimidation, harassment or serious harm to communities by Eni suppliers or security forces (public or private) protecting Eni’s employees, facilities, assets and operations. In case of grievances assessed with “high severity”, the process of assessment and management of the grievance at local level escalate to HQ and is conducted in coordination the Central Sustainability Function, which may formulate recommendations to support the management/resolution of the grievance, also in terms of compliance with corporate commitments and international standards adopted by Eni. The company procedure on Grievance Mechanism is currently under update.

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.

During 2024, **61** grievances were received and **43** were resolved (out of the 43 resolved, 34 belong to those 61 received during 2024). The grievances mainly concern community relations management, management of environmental aspects, land management and supplier management.



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

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

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

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

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

The results of the HRIA are finalized in a Report with recommendations, followed by a dedicated action plan adopted by Eni to address the recommendations. If needed, recommendations and actions are also related to the relation with the Business Partners, such as JV partners and suppliers, with the goal of accompanying them in a virtuous path of improvement and mitigating the potential human rights risks highlighted during the HRIA. In 2024,



the implementation of the Action Plans relating to the HRIA carried out in previous years continued and their monitoring was ensured.

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

In 2024 Eni started a new kind of engagement with stakeholders; after the implementation of the Conflict Analysis Tool in Nigeria (2022) and Mozambique (2023 and 2024) Eni Security Dept. Headquarters alongside Eni Rovuma Basin (ERB) Security Manager began to undertake a **Train of Trainers (ToT) project** on Security and Human Rights to be implemented in Mozambique.

A security provider was involved to draw a Training Model fit to Mozambican environment and consistent with the best practices in security and human rights, including the VPSHR and International Code of Conduct for Private Security Providers.

In late 2024, the project kicked off with the support of the Head of Security and ERB Managing Director: presumably in the third quarter of 2025 trainers from security provider will travel to Mozambique to develop the course on a 7-day basis and focused on Public Security Forces.

The scope of the course is expected to affect 20 Officers in the training process. The ultimate goal of training of trainers (ToT) will be to provide lines of officers ready to train their colleagues on security and human rights.



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

**The procurement process for security goods and services**, including the selection of private security providers, is regulated in accordance with the provisions of “Security Management System Guideline” and “Global Procedure Source to contract”.

It shall ensure the selection of suppliers/contractors meeting strict reliability, integrity and ethical requirements, including verification of suppliers/contractors in serious infringements of human rights. Besides, another company procedure, a Professional Operating Instruction named **“Provision of security goods and services by central security function”**, reaffirms this concept, providing that, in contracts with security services providers, specific clauses regarding conduct aimed at respecting human rights are included.

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

**With reference to contracts with private security forces**, model clause claims that the Parties undertake to ensure the respect and protection of Human Rights in line with the “United Nations Universal Declaration of Human Rights”, 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 “International Covenant on Civil and Political Rights”, the “Covenant on Economic, Social and Cultural Rights”, the “Declaration of the International Labour Organization on Fundamental Principles and Rights at Work” and the OECD Guidelines for multinational enterprises. The Parties also commit to act according to the provisions of the



Voluntary Principles on Security and Human Rights, the Code of Conduct for Law Enforcement Officials of the United Nations and the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials of the United Nations.

In the second part of the Model Clause is established that the contractor undertakes in particular to: i) respect, protect and enforce the human rights of every individual, without any discrimination of gender, race, religion, personal and social conditions, language, sexual orientation, political opinions; ii) provide adequate working conditions to its employees and to respect the prohibition of the use of forced labor and child labor, the right of everyone to freedom of peaceful assembly and association, the right to engage in collective bargaining or other related rights; furthermore, it is established not to employ, for the provision of security services, persons under the age of 18 nor individuals credibly implicated in human rights abuses, ensuring that security personnel are adequately trained to respect the rights of employees and the local communities; iii) guarantee not to use force and firearms, except in self-defense or defense of others against the imminent threat of death or serious injury.

In the contractual clause it can be found the obligation for the contractor to comply with the US Global Magnitsky Act, enacted in 2016. According to the wording of the clause, the contractor must declare and guarantee to comply with the principles contained in the applicable international regulations, laws, agreements and best practices and in the guidelines aimed at preventing and combating human rights violations, including the US Global Magnitsky Act and related executive orders, and the Council Regulation (EU) 2020/1998 of 7 December 2020 concerning restrictive measures against serious human rights violations and abuses.

**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 the **"Security & Human Rights Workshop"**.

Eni developed and conducted a half day workshop in **Maputo** and two days of training sessions in Pemba on security and human rights for field level and command security personnel. The first event in Maputo brought together senior police and military officers, members of the government, diplomatic representatives, civil society and NGOs, as well as Eni management.

The two days of training sessions in **Pemba** were dedicated to Public Security Forces and private security providers, aimed not only to clarify basic principles on human rights (e.g. use of force), but also to develop practical scenarios in which these principles could be applied.





### **SECURITY AND HUMAN RIGHTS WORKSHOP IN MAPUTO**

26th August - The full training session lasted 3 hours, divided between the opening session and the training session. Among the participants: the Mozambique Defence Armed Forces (FADM), the Mozambique Republic Police (PRM), diplomatic representatives, Eni Management (Managing Director of Eni Rovuma Basin, Head of Eni Global Security, Security Manager of Eni Rovuma Basin), the Permanent Secretary of the Ministry of Justice, Constitutional and Religious Affairs, the National Director of Human Rights and Citizenship, as well as other members of NGOs and civil society.

As demonstrated by the feedback forms, the workshop was highly appreciated by all participants.

### **SECURITY AND HUMAN RIGHTS WORKSHOP IN PEMBA**

28th and 29th August - The training carried out in Pemba included members of the police, the armed forces and private security companies. The training was divided into two distinct parts: the first one, was held in a classroom and dedicated to human rights and levels of use of force; the second one, was held in an external environment, where scenarios were drawn up on the use of force, negotiation and behavior in cases of theft.



Another example of supporting outreach, education and training of private and public security forces is the project named **“In-Country Security & Human Rights Workshops”**.

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

The initiative also aimed to spread human rights awareness and sensitivity by giving a leading role to local security officers and security agents instead of external security providers.



In particular, the project was launched in late 2023 and coordination meetings with the subsidiaries started in February 2024. The objective was to carry out two phases of implementation of the workshops: the first between March and July, the second between September and December.

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

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

In 2024, 716 people were involved, including Private and Public Security Forces. Below, the Countries where the project has been implemented:

1. Iraq
2. Nigeria
3. Libya
4. Algeria
5. Egypt
6. Congo
7. Tunisia
8. Mexico
9. Ivory Coast
10. Kenya

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



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

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

Eni's training on Business and Human Rights is organized in a diversified strategy along four guidelines: i) General courses on Business and Human Rights for all Eni people; ii) Specific courses on topics and areas particularly exposed to risks of negative impacts; iii) Training initiatives on issues closely linked with human rights (e.g. Code of Ethics, HSE, etc.); iv) Training courses on Security and Human Rights.

In 2024, 955 hours of human rights training – which include security and human rights issues - have been delivered to Eni employees.



## 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*

The lessons coming from the Conflict Analysis Tool implementation and from the In-Country Workshop implementation were precious: never take something like Mozambican society analysis for granted and never undervalue fields issues like operational and logistic troubles that security practitioners have to face in planning a two-hour In-Country workshop.

*New initiatives and programs related to the Voluntary Principles in 2025*

In 2025, Eni undertook several initiatives and one goal inspired them: to give human rights awareness the widest dissemination through all Eni employees, customers, suppliers, stakeholders and every other entity Eni encountered.

This aim was pursued both with an unwavering operational retrofitting (see: the company process for reporting allegations of security-related incidents with human rights implications by public/private security forces to the appropriate authority) and with new ideas to be implemented.

About the latter, **the first project Eni Security undertook** between the end of 2024 and early 2025 was the **Train of the Trainers (ToT)** in Mozambique, a proposal drafted by an external security service provider to support Eni in the



drafting of the following services to align its operations with security and human rights best practices, including the VPSHR and the International Code of Conduct for Private Security Providers: develop and deliver a 7-day training course based on the 2-day security and human rights training for public security forces.

The ToT courses will be conducted by experienced training providers. The workshops will be conducted in Portuguese. After completing the Train of the Trainer program, a newly formed group of Police and military “trainers” will be able to train police and security forces on security and human rights. Delivery of the ToT course will take place during 2025.

**The second project** Eni will pursue in 2025 will be **integrating risks to HRDs into training for public and private security providers.**

This task will be managed alongside security provider: presentations to support Human Rights Workshops and addressed to public and private security forces would be equipped with focus on risk of violation of Human Rights of Human Rights Defenders, especially Women HRDs, owners of differentiated risks.

This project entails the creation of a new focus on those who are the real shields against human rights abuse and violations: “Defenders work non-violently, individually and collectively to promote or defend human rights through activities such as trade union organizing, legal or judicial advocacy, community organizing, protests or demonstrations in defence of human rights, advocacy campaigns and journalism. Human rights defenders can be any age, sex, gender, religious affiliation, ethnic background or nationality<sup>6</sup>”.

Highlighting the role of these actors might be beneficial to the whole Human Rights mechanism help to join forces and energies to spot new kind of players. Other 2025 initiatives are the aforementioned **In-Country Workshop on Security & Human Rights.**

The **In-Country Workshop initiative** aims to spread human rights awareness and sensitivity by giving a leading role to local security officers and security

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<sup>6</sup> “Guidance on Respecting the Rights of Human Rights Defenders” – Voluntary Principles Initiative, Section 1, pag. 8.



agents instead of external security providers. The 2025 strip joins the 2024 strip of ten countries and continues the project launched at the end of 2023.

The countries where the workshops are most likely to be implemented are Central Africa and the Far East.

