



**SLAVERY AND HUMAN**

**TRAFFICKING STATEMENT 2024**



# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024

## INTRODUCTION

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

must respect internationally recognised human rights, as established in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. Eni is committed to maintaining and improving its practices to act against slavery and human trafficking in its operations and along the supply chain. Eni expects its Business Partners to respect human rights, has zero tolerance towards human rights violations and expects its supply chain to comply accordingly.

## ENI'S BUSINESS AND SUPPLY CHAIN

Eni is an energy company, integrated along the entire value chain. It has a significant presence in the traditional activities of exploration and production of conventional oil and gas and in the marketing of gas/LNG through an extensive supply portfolio.

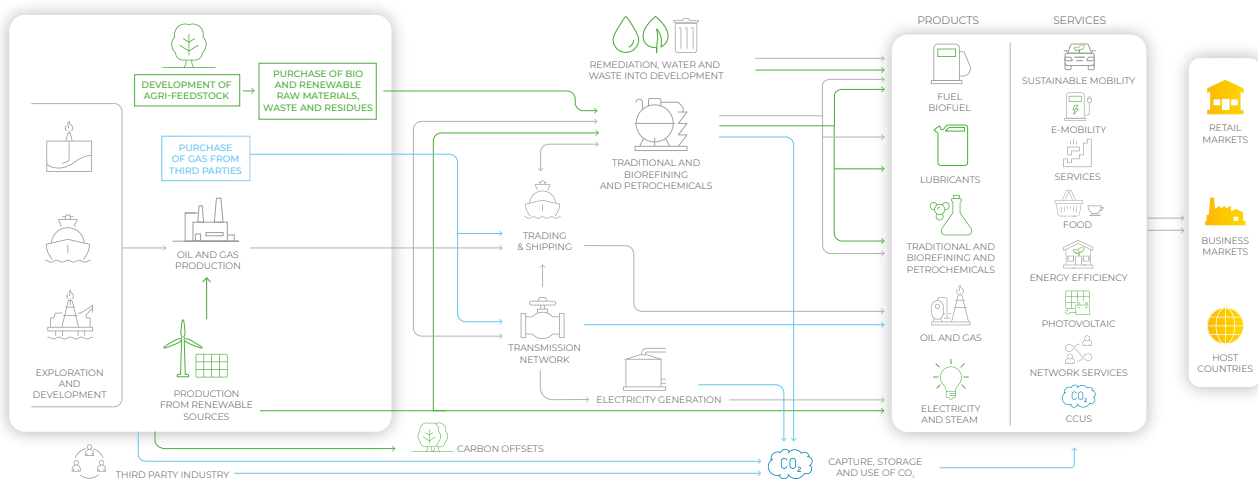
In the downstream oil/petrochemicals industry, a major process of transformation and reconversion is underway. Eni is engaged through innovative business models in the development of new energies and decarbonisation services: renewables from solar/wind, biofuels, biochemistry, CO<sub>2</sub> capture/sequestering and research lines on new energy paradigms (magnetic fusion, chemical recycling of plastics). Eni has a large customer base of both industrial and end-user customers. The Group's distinctive strategy is founded on competitive ad-

vantages, in-house expertise and proprietary technologies as reference points with the aim to grow, create value and transform the Company.

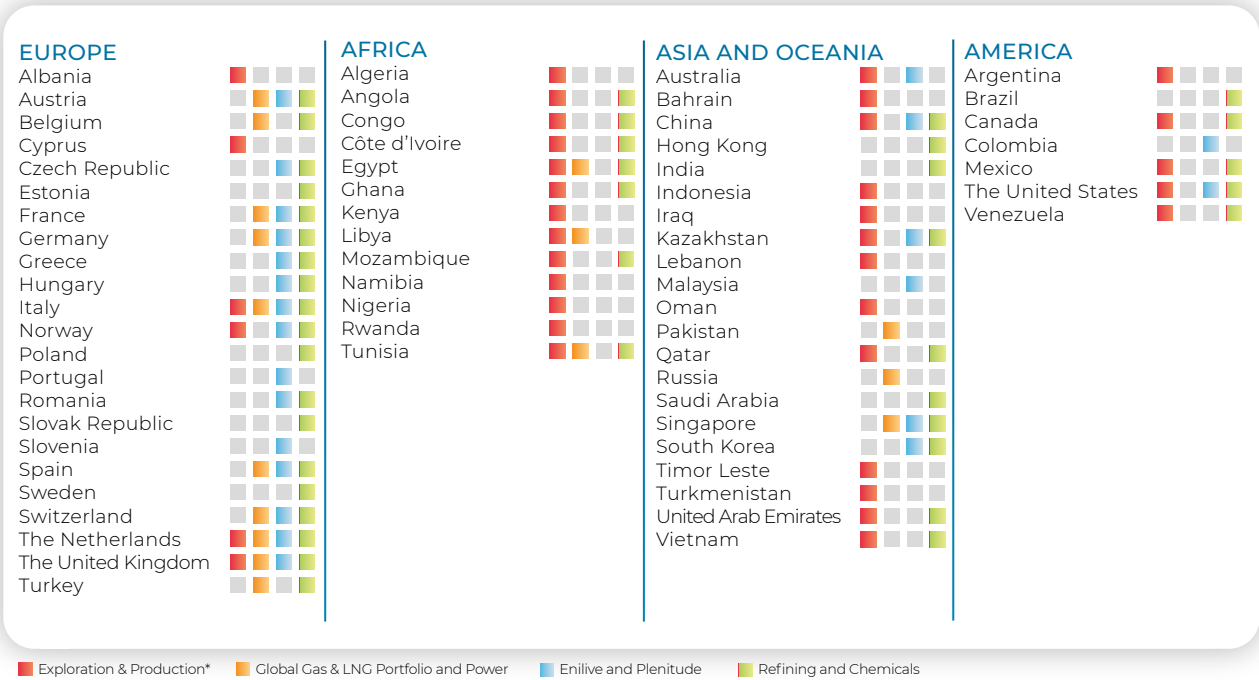
In traditional activities, growth and returns leverage on successful exploration, with an option for early monetisation of discoveries, efficient resource development and the establishment of independent entities in synergy with qualified partners, in focused geographic areas, to pursue development opportunities and profitability.

In activities related to the energy transition, Eni's satellite model involves the establishment of entities engaged in the development of products and solutions with reduced carbon footprint, capable, thanks to the entry of dedicated capital, of growing autonomously and financially independently, releasing value for the parent company, as evidenced by the successes of Enilive and Plenitude.

### Eni's value chain



Eni's presence worldwide



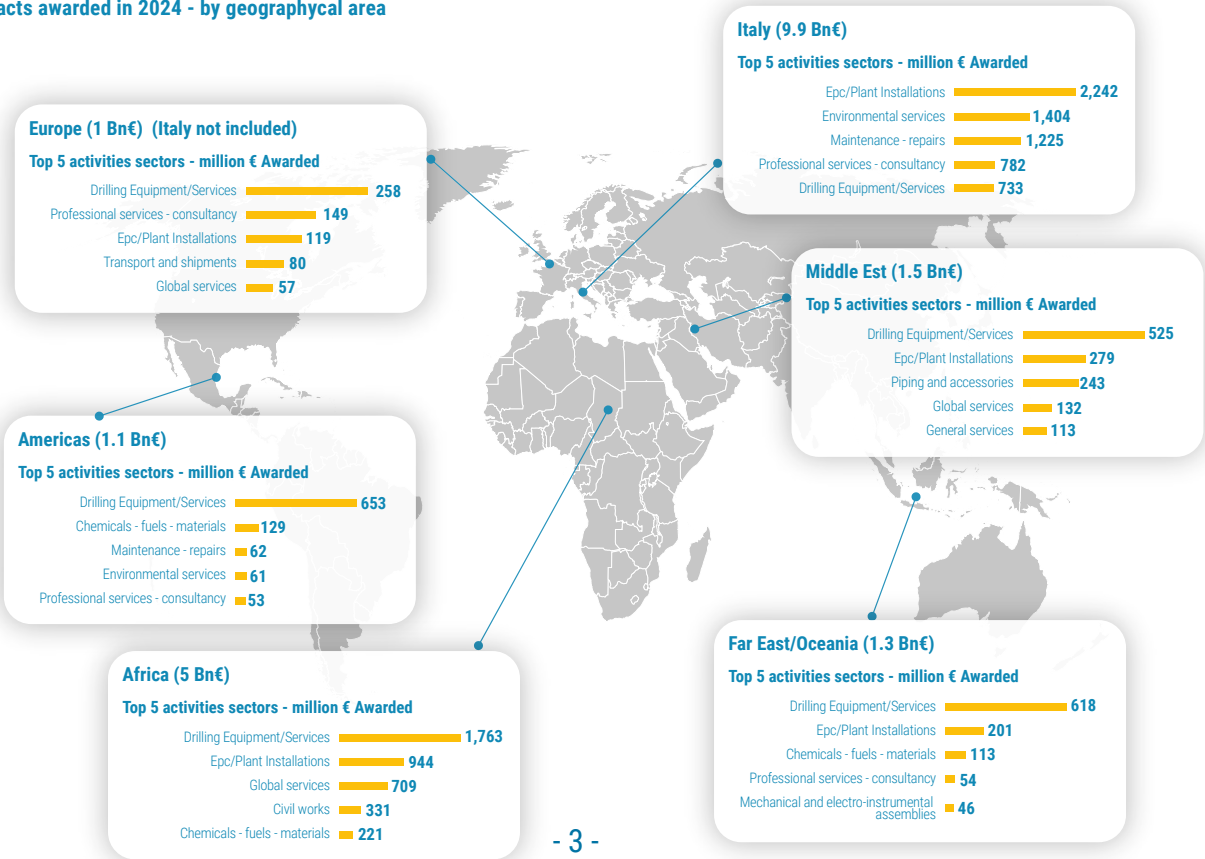
Eni has more than 32,000 employees in 64 Countries around the world.

Eni's supply chain

Eni's operations are supported by a global supply chain that includes suppliers of goods, works and service from all over the world. In 2024, procurement spending amounted to approximately 19.8 billion euros, with 17,111 contracts awarded

worldwide by its procurement departments around the world. The main procured goods included logistical support for the well area and auxiliary services, offshore facilities, engineering services for the oil & gas sector, professional services, and well drilling services.

Contracts awarded in 2024 - by geographical area



## HUMAN RIGHTS POLICIES AND GOVERNANCE

### Corporate Governance: focus on human rights

Eni set up a governance structure that can support sustainable development strategies, identifying the Board of Directors of Eni SpA as the body responsible for defining – upon CEO proposal – the Company's strategy and objectives, including those related to sustainability and approving results. The CEO ensures the implementation of the Board's resolutions and periodically reports to the Board. The Board also approves the most important internal rules, including the Code of Ethics and the ECG Policy "Respect for Human Rights in Eni".

The Sustainability and Scenarios Committee, within the Board, has the responsibility to advise the Board on scenarios and sustainability issues, including recommendations on human rights. Each year, the Sustainability and Scenario Committee examines Eni's management model on human rights and the Slavery and Human Trafficking Statement.

Further key functions played by the Board, after consultation with the Control and Risk Committee, are:

- The definition of the general and specific guidelines for the Internal Control and Risk Management System of Eni.
- The definition of the nature and level of risk compatible with the strategic objectives of the Company and a periodic review of Eni's main risks.
- The periodic evaluation of the adequacy and effectiveness of the Internal Control and Risk Management System of Eni.

Human rights issues, even those related to supply chain, are included when assessing the above risks and measuring their impacts.

The Sustainability function and Integrated Compliance function oversee, each for their area of concern, the overall day-to-day approach of Eni to human rights and supports Eni's business/staff functions to ensure respect for human rights within their processes, according to the identified salient human rights issues.

For more details on Eni's Corporate Governance, please refer to the 2024 Corporate Governance and Shareholding Structure Report and the 2024 Annual Report - "Governance" section.

### Policies and rules on human rights

Eni's work is guided by the values and principles described in the **Code of Ethics**, in the Policy "**Respect for Human Rights in Eni**", and in the **Suppliers Code of Conduct**.

The **Code of Ethics** sets out the main values that guide Eni's actions and contains effective rules of behaviour, so that the principles contained therein form a practical guide for corporate operations. The Code of Ethics provides for the refusal of all forms of forced and/or child labour and enunciates Eni's commitment to defining and disseminating policies, standards and rules that guide the actions of its suppliers and partners towards the respect for human rights and its principles of sustainability. The Code of Eth-

ics is part of the "General framework of regulatory system", which inspires the provisions contained in Eni's regulatory instruments and inspires the model of organization, management, and control. The Code of Ethics applies to all direct and indirect subsidiaries, both in Italy and abroad, and to all Eni's stakeholders. The Code was significantly updated on March 18<sup>th</sup>, 2020.

The **Policy "Respect for Human Rights in Eni"** includes an explicit commitment to both implementing the human rights due diligence and providing access to remedy in accordance with the main international frameworks (e.g. UNGPs and OECD Guidelines). The Policy was approved by the Board of Directors of Eni SpA on 14<sup>th</sup> September 2023, and it replaces the Eni's Statement on respect for human rights. The Policy outlines a single and cross-cutting model to ensure compliance and respect for human rights in the design of all corporate regulatory processes also considering the ongoing regulatory developments on the topic, capitalizing in a single document the meaningful internal regulatory heritage developed by Eni over the years.

The document is structured in two sections: the first defines the principles at the basis of Eni's commitment to respecting human rights, in particular the so-called "salient human rights issues" – the most important issues in consideration of the business activities and geographical areas of presence of the Company as well as outlining the roles and responsibilities with reference to these principles; in the second section of the Policy the due diligence model adopted is described in details.

Regarding the respect of the human rights in the workplace, the Policy includes a provision for the rejection of any form of forced or compulsory labour as well as any exploitative labour practices including, for example: human trafficking, restriction of freedom of movement and seizure of identity documents.

Eni expects third parties, included own suppliers, to commit to observe the principles set out in the Policy and the specific commitments Eni has made. With the purpose of safeguarding the respect for human rights in the supply chain, Eni established a procurement process that entails the adoption of an assessment model with a focus on human rights. Eni adopts processes to prevent human rights impacts and assesses its suppliers through a risk-based model, that, where necessary, foresees the implementation of corrective actions and their monitoring.

Sustainability function and Integrated Compliance function ensure, each for their area of concern, the implementation of the Policy and its monitoring, as well as guaranteeing, through a so-called "embedded" approach, the integration of human rights issues in the design of all corporate processes, including relations with Third Parties and external Stakeholders.

The **Global Framework Agreement** on International Industrial Relations and Corporate Social Responsibility (GFA) includes specific provisions regarding the respect for international standards on human and labour rights as well as appropriate clauses against any violations of

such rights, in addition to the requirements for qualifying suppliers and subcontractors. The GFA was lastly renewed in 2019 by Eni, the IndustriALL<sup>1</sup> Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL<sup>2</sup> trade unions, and it is now under renewal in 2025. The Parties of the Agreement annually meet to share information on certain issues including those pertaining to sustainability and human rights.

In line with the Code of Ethics and Eni's corporate culture, which promotes inclusion and respect for uniqueness, in December 2021 Eni issued a policy against violence and harassment in the workplace.

The **Zero Tolerance policy**, in accordance with the principles of the Geneva Convention of the International Labour Organisation, defines a broad perimeter of types of harassment that allows Eni to identify misconduct and behaviour that should not be engaged in and should be reported. Eni wants to increasingly ensure a working environment free from violence and harassment of any form, where the people of Eni can all feel protected and free to express ourselves.

Finally, the **Suppliers' Code of Conduct** sets Eni's expectations on suppliers regarding compliance to internationally recognized human rights standards and describes Eni's position regarding laws, integrity, and transparency. It entails obligations for suppliers to act against modern slavery, child labour, discrimination in the workplace and for the protection of workers' rights in general.

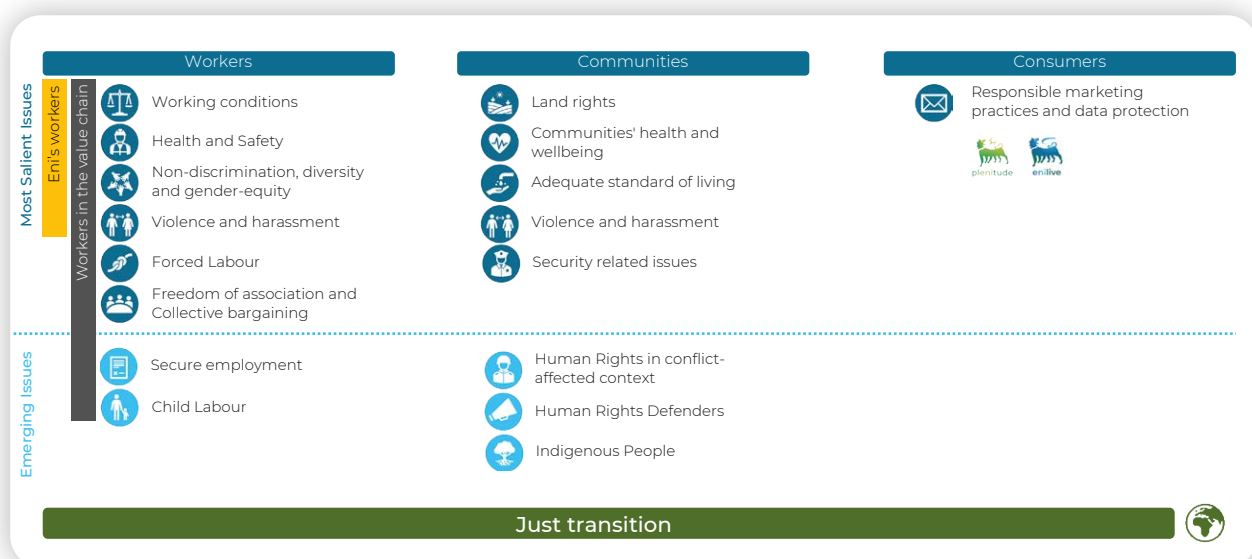
Regarding the above-mentioned corporate policies and rules, Eni operates within the reference framework of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labor Organization, the UNGPs and the OECD Guidelines for Multinational Enterprises.

## HUMAN RIGHTS DUE DILIGENCE AND RISK MANAGEMENT

Eni's approach to human rights due diligence is described in the Policy "Respect for Human Rights in Eni". In line with the UNGPs and the OCED Guidelines, the due diligence is set on an iterative (not once-off) process, context-specific and covers the entire spectrum of human rights implications for Eni; it is designed to be multidisciplinary, multilevel, and integrated at any level of the company's processes. The Human Rights Due Diligence follows a risk-based approach to identify, prevent, mitigate, and account for adverse corporate impacts on human rights. The risks identified through the due diligence are defined as risks to rightsholders. Eni has been developing and implementing different approaches and processes aimed at identifying impacts on human rights, including ones linked to the workforce management – direct and indirect (in the supply chain), such as modern slavery and human trafficking.

Eni's human rights management model focuses on the issues considered most significant for the Company considering the business activities conducted and the contexts in which it operates. This set of issues, the so-called "Salient Human Rights Issues", identified for the first time in 2017, was updated during 2024. The update was conducted through the involvement of over one hundred people from various Eni corporate functions and Group's companies in dedicated workshops and by engaging several authoritative stakeholders. In addition to the most significant issues, divided between workers (direct and those of the value chain), communities and consumers, five emerging issues were identified to be monitored as relevant in relation to specific business segments or operating contexts.

### Eni's Salient Human Rights Issues



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

2. Main Italian trade union organizations.

In addition, during 2024, the first compliance risk assessment on the 'human rights' area was completed. The activity – aimed at identifying risk activities (including management of own workforce, suppliers, customers, joint ventures, M&A, etc.), their risk-based evaluation and the identification of possible risk treatment actions – was carried out in synergy with the update of the salient human rights issues.

The compliance risk assessment was conducted through the following phases: (i) analysis of the external and internal regulatory context and identification of specific risk activities; (ii) evaluation of "inherent risk" exposure calculated based on specific indicators (such as Country risk and the number of salient issues) and the level of "residual risk" on the basis of the existing mitigation measures (such as internal regulatory regulations, contractual clauses, training, etc.); (iii) identification of action plans for the possible strengthening/optimization of existing mitigation measures from a risk-based perspective and support for the revision of reference regulatory instruments.

Finally, risks of potential human rights impacts, e.g. the modern slavery, are included in the "Integrated Country Risk" (ICR), whose purpose is to offer an integrated analysis of risks existing in Countries of either presence or interest for the Company.

To evaluate the human rights risks of the operating Countries is also used a third-party provider (Verisk Maplecroft).

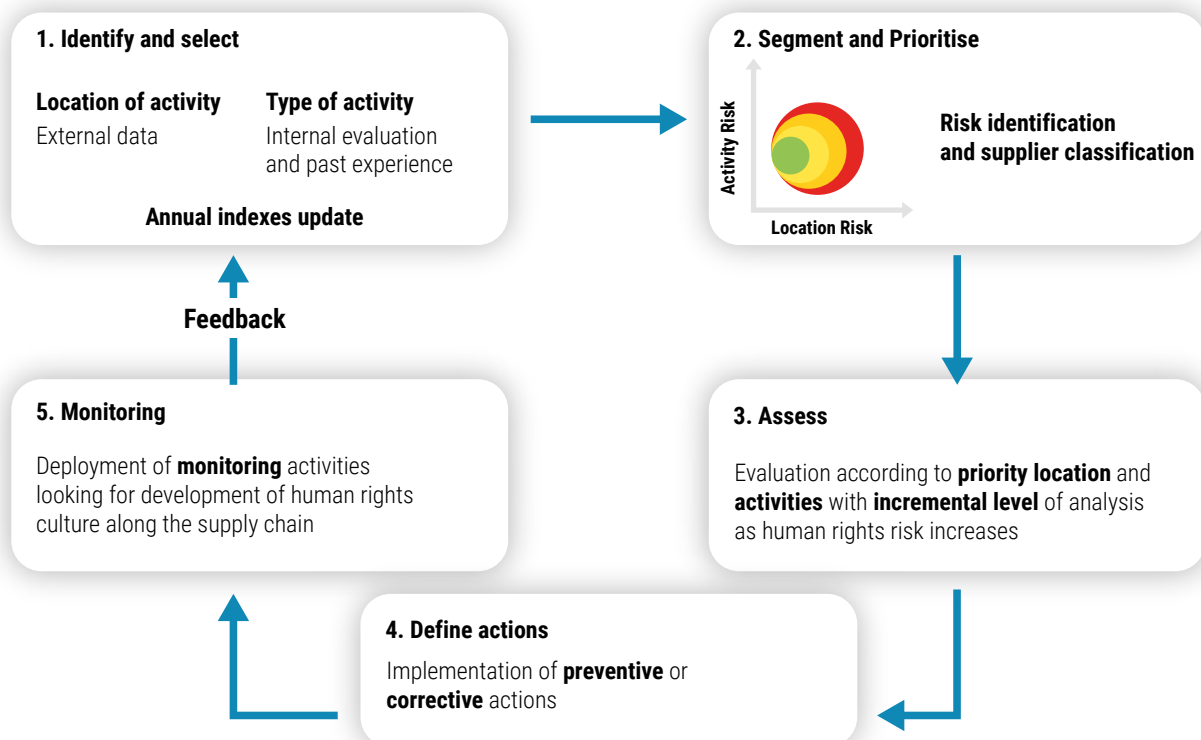
### Assessing and managing risks related to direct workforce

Eni is aware that in some Countries of operations relevant risks related to human rights violations can be detected, included modern slavery. Conscious of this, Eni has in place an articulated framework of policies, management models, contractual clauses, and practices to be adopted by Eni's subsidiaries<sup>3</sup> – in line with the commitments undertaken by the parent company in the Code of Ethics and in the Policy Respect for Human Rights in Eni – which allow to effectively manage these risks in direct workforce management. Starting from 2020, a risk-based model for assessing respect for human rights in the workplace was introduced aimed at segmenting Eni's companies based on quantitative and qualitative parameters in order to outline potential issues and risks of the Country/operating context that are linked to the human resources management process, including contrasting all forms of discrimination, the recognition of gender equality, fair working conditions, freedom of association and collective bargaining. This approach identifies possible areas of improvement, requiring specific actions to be defined and monitored over time.

### Assessing and managing risks along the supply chain

Respect for human rights along the supply chain is an essential prerequisite for Eni. This commitment is carried out through the procurement process by adopting an evaluation model based on human rights performances and transparent and impartial conduct in selecting suppliers.

#### Eni's approach to assess and manage risks along the supply chain



3. Operating independently and having determined on implementation of those policies for themselves.

Eni applies the human rights risk-based model through which suppliers are monitored throughout the procurement process to assess and manage human rights along the supply chain. The risk model evaluation is based on an objective and transparent approach, leading to a supplier's classification according to the potential risk of human rights violations. Such risk is deduced considering the supplier's Country and the type of performed activity.

The model allows Eni to improve and strengthen the attention to respect for human rights in the riskiest geographical areas in which it operates. The application of the risk-based model in 2024 led to the identification of Libya, Congo, Tunisia as the Countries with the highest number of suppliers at risk.

The model outlines differentiated control methods related to the different risk levels (the higher the risk of the supplier, the higher the level of detail of the assessment) inspired by international standards such as SA8000.

In the procurement process the suppliers are subject to a continuous evaluation through:

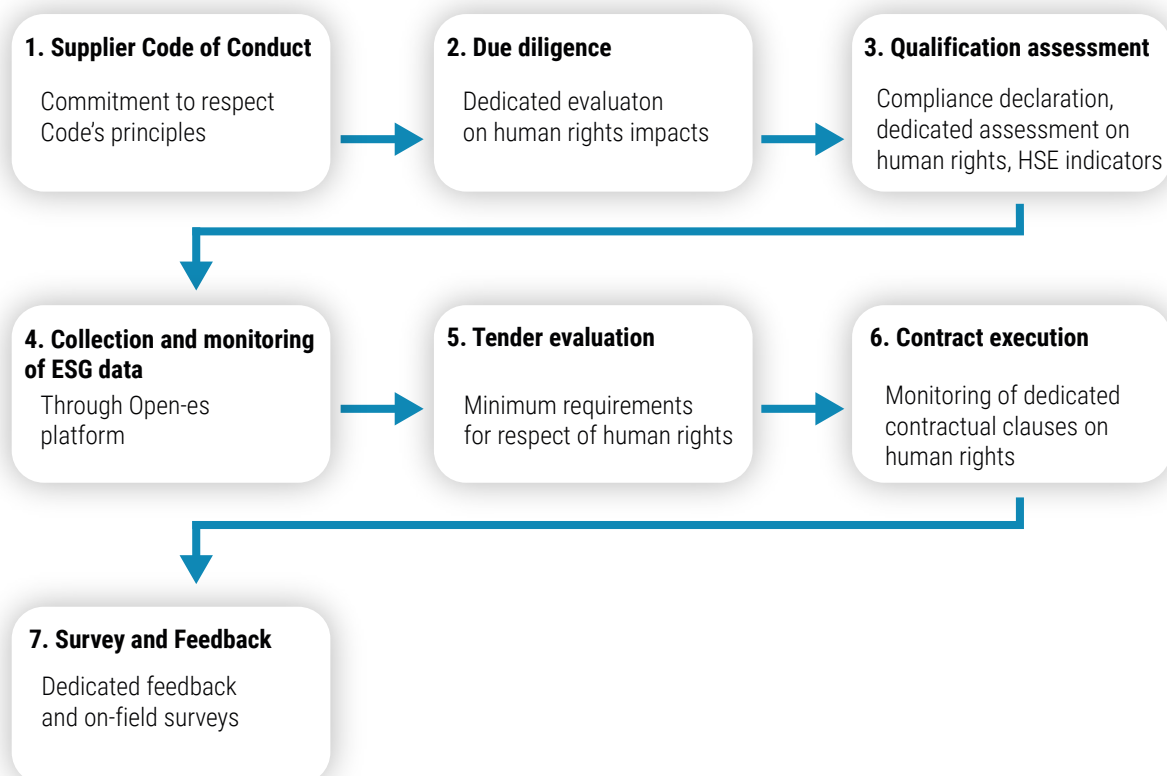
1. Subscription of the Supplier Code of Conduct. To become or maintain the status of Eni's supplier, all companies that are willing to collaborate with Eni are requested to undersign the Supplier Code of Conduct, which is based on social responsibility's principles and human rights requirements. The Supplier Code of Conduct represents a mutual commitment in recognising and protecting the value of all its own people, operating with integrity, protecting company resources, promoting the adoption of

such principles to their own workforce and supply chain.

2. Due Diligence verifications about involvements in human rights violations, carried out on open source regardless the supplier's human rights risk level.
3. Periodical qualification assessment based on performance indicators, documental or on-site audits and dedicated questionnaires to minimise the risks of human rights violations.
4. Collection and monitoring of ESG data and information, including the ones related to human rights management, through the Open-es platform.
5. Adoption and evaluation of human rights minimum requirements during tender processes, particularly in the case of activities with potential high human rights risk.
6. Evaluation and monitoring during contract execution of Eni's contractors and subcontractors, even with on-site audits aiming at preventing any forms of modern slavery, forced labour, child labour, discrimination or unequal wages.
7. Feedback processes with focus analysis on respecting human rights and requests to implement improvement actions if there are critical issues. If minimum standards of acceptability are not met, the supplier is excluded from Eni vendor lists and all business relationships are interrupted.

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

#### Continuous evaluation in procurement process



By applying the risk-based model, during 2024, more than 1000 in-depth human rights evaluations were carried out through documental and on field audits, more than double the number of audits performed in 2023. In such activities, 50% of the cases led to areas for improvement that were addressed together with suppliers by giving them tools to support their development. The areas of improvement related mainly to the management of the human rights in their supply chain which occurred considering the different dimensions of the companies involved in the assessment and consequently their governance maturity on these aspects. Suppliers that have shown shortcomings have been limited from participating in Eni tenders and a corrective action plans have been agreed with them to ensure respect for human rights. During an audit on a supplier, a case of discrimination at work was found in the pre-employment phase, as a result of which the supplier's possibility of participation in purchasing procedures has been limited, while sharing a remediation plan whose implementation will be verified by Eni through on-site audits. These verifications set out a path of improvement for suppliers who have highlighted gaps in this area, encouraging constructive discussion and a greater awareness of the areas of intervention.

Finally, in line with the principles of "responsible contracting" suggested by the best practices and international guidelines on business & human rights, Eni has implemented a system of standard clauses on human rights – on a risk-based approach – for specific types of contracts that it enters and provides support to the business for their definition and negotiation. These clauses, which can be supplemented and adapted to each case, are classified according to the type of counterparty and contractual case: (i) light (referring mainly to preliminary agreements and with public counterparties); (ii) medium (referring to commodity contracts, consultancy contracts and active supply contracts); (iii) elaborate (referring to passive supply contracts or com-

plex transactions such as M&A). Standard clauses are not applied, however, in an automated manner; on the contrary, they require a case-by-case assessment from the relevant unit within the Integrated Compliance Function, in presence of complex indicators such as: a) initiatives with potential impacts on local/indigenous communities and/or requiring their involvement; b) initiatives with specific risk areas such as social projects, joint venture agreements and forestry or agri-business agreements.

## ASSESSING EFFECTIVENESS

Eni is committed to continuously improving its monitoring and evaluation processes applied to human rights issues. Within this context, KPIs are used to monitor the effectiveness of Eni's efforts to prevent human rights violations, also in terms of modern slavery practices.

In 2024, relevant KPIs related to staff training, suppliers' assessments, critical issues, and any human rights impacts, as well as whistleblowing events, were monitored in continuity with the previous years and drove Eni's actions to improve. Data and figures regarding performance are available in the 2024 Annual Report, in the Sustainability Report "Eni for A Just Transition" and in the Report "Eni For Human Rights".

Eni sets annually specific targets, which are embedded in the objectives assigned to the management in charge of the processes more at risk in terms of potential human rights impact. The Sustainability Department is responsible for proposing and monitoring progress in such Management Objectives, including respect for human rights in the supply chain. The internal audit program is also highly relevant for assessing the effectiveness of the internal regulation and its application to human rights.

Periodically, at least once a year, the approach towards modern slavery and, more broadly, on human rights is reported to the Sustainability and Scenario Committee.

### **Assessing specific business activities**

*Aware of the results of the mapping of Eni's salient human rights, specific analyses were conducted during 2024 on trading and shipping activities and on the purchase of biomass for the production of vegetable oils (so-called agri-feedstock) utilised to produce biofuels.*

*Such activities, although they offer significant development opportunities for the agricultural sector, are also potentially exposed to possible negative impacts relating to the working conditions to which farmers in the supply chain are subject (for example informality and working hours, wages, forms of forced labour and child labour, violence and harassment, health and safety).*

*To properly manage such potential impacts, following the mapping of the current controls in trading and shipping activities it was decided to strengthen the responsible sourcing principles and some measures in the traders' evaluation phase. Furthermore, in consideration of the specific aspects linked to maritime transport, an expansion of the checks is envisaged regarding the working conditions of the crews used for shipping activities.*

*With reference to the agri-feedstock supply chain, a specific framework has been defined and a dedicated set of measures set up to oversee it. This set of measures includes the conduction of specific impact assessments for the entire supply chain as well as cross-cutting actions, such as training and awareness-raising initiatives for Eni counterparts and entities operating along the supply chain, ad hoc contractual clauses, and the strengthening of screening criteria for commercial counterparts. In addition, the conduction of specific audits is also included, as well as the monitoring of any actions/recommendations for the management of critical elements emerging from these checks.*

## TRAINING AND AWARENESS

Eni considers training and awareness-raising activities dedicated to its employees and Business Partners an essential element of its commitment to respecting human rights. Eni wants to ensure that every employee is aware of the importance of human rights to the Company. 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:

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

In the last two years, human rights training modules have been made available to all employees<sup>4</sup>, at the conclusion of the three-year training program 2020-2022, during which more than 68,000 hours of training were provided to managers and senior managers (Italy and abroad). To specifically raise awareness about human rights risks along the supply chain, a specific training module was addressed to Eni's procurement professionals focused on labour rights (e.g. working conditions, working hours, modern slavery practices).

Moreover, an online course on labour rights, structured on 12 modules and developed by IPIECA, was promoted among Eni's employees and suppliers to raise awareness about responsible working conditions – including risks of modern slavery, and to facilitate understanding workers' rights, as well as how to identify, manage and mitigate the risks of non-compliance with such rights.

Eni also engages suppliers and companies in other awareness and development initiatives through Open-es, an alliance that joins together entrepreneurial, financial and associative networks, supporting all stakeholders on their sustainable development path through a digital and innovative platform. Today involving more than 28,000 companies and 30 partners, the initiative represents an inclusive and collaborative community with a virtuous commitment on ESG targets to support companies in measuring and improving their sustainable performances. For Eni's procurement process, participating in Open-es is an essential requisite to evaluate and valorize suppliers' commitment in enhancing their competences on ESG topics such as managing and mitigating human rights risks, like child labor and forced labor. During 2024, as part of the Open-es initiative, together with the involvement of suppliers in workshops dedicated to training and raising awareness on

human rights, an area dedicated to measuring the respect for human rights was made available to Eni's suppliers and all companies in the community. Through an assessment, companies receive feedback on their positioning and some useful ideas and suggestions on the actions to be taken to improve. Furthermore, Eni organizes workshops and training and awareness-raising moments where suppliers can discuss ESG issues with experts, including those related to respect for human rights in the supply chain.

## WHISTLEBLOWING AND GRIEVANCE MECHANISMS

Eni people – as well as all those who operate or have operated in Italy and abroad in the name of or on behalf of or in the interest of Eni, each within the scope of their functions and responsibilities – can report any wrongdoing which extends to human rights impacts, including modern slavery, as described in the internal regulation **“Whistleblowing Reports received by Eni SpA and its subsidiaries”**<sup>5</sup>, in full confidence and without fear of retaliation. All the whistleblowing reports received are fully investigated and disclosed with the related appropriate remedial actions taken. Annual information about whistleblowing reports received and actions taken is published in Eni's Annual Report, and on the website<sup>6</sup>.

Among the reports received through the whistleblowing channel in 2024<sup>7</sup>, **Eni has identified no case of modern slavery**. However, for the sake of completeness, Eni received a report from a supplier's employees regarding excessive overtime and late or partial payment of wage by the suppliers itself. This report was managed according to the whistleblowing procedure and it has been proved founded, therefore Eni has implemented procedural and contractual measures to prevent the recurrence of non-compliant events.

Moreover, operational-level **Grievance Mechanisms** are defined based on a proactive and structured approach to receive, recognize, investigate, respond, and resolve complaints from individuals or groups of individuals in a timely, planned, and respectful manner. These Grievance Mechanisms make possible to manage risks and foster positive relationship with stakeholders, as well as provide remediation in case of non-compliance.

**No grievances were received in 2024 referring to modern slavery**. Details are available in Eni's “Annual Report”, in “Eni for A Just Transition” and in “Eni for Human Rights”.

## MULTI-STAKEHOLDER INITIATIVES

Engagement with representatives of rights-holders is an essential activity of Eni's human rights approach. The annual meeting with the IndustriALL Global Union and the FILCTEM CGIL, FEMCA CISL and UILTEC UIL trade unions envisaged within the GFA, for example, is a key opportunity to share information on Eni's performance, actions and

4. Around 2,000 hours

5. Updated recently on March 2024.

6. <https://www.eni.com/en-IT/governance/management-reports.html>.

7. 32 files received in 2024 relating to human rights issues.

plans concerning HSE and Sustainability (including main HSE indexes related to employees and contractors), reports or grievances relating to human rights issues (if any) and positive actions in favor of non-discrimination.

Eni builds long-term relationships with prominent human rights experts and organizations to achieve multiple goals, ranging from undertaking joint actions to improving its understanding of cutting-edge topics, from contributing to the debate on business and human rights to exchanging lessons learned and best practices.

Eni is an active member of IPIECA<sup>8</sup> participating, among others, to the Social Responsibility Group, the Human Rights Working Group (HWG) and the Supply Chain Working Group (SCWG), where the most relevant issues for the industry are discussed and guidance are prepared. Within this context, Eni collaborated in preparing the guidance “Labour rights risk identification in the supply chain”<sup>9</sup> and its related operating tool, as well as the training platform for suppliers and contractors described in the previous paragraph.

Eni has also signed a five-year global initiative with the International Labour Organization (ILO), aiming to increase social protection coverage for farmers in the agribusiness sector in Kenya and Côte d’Ivoire, where Eni is developing agri-feedstock projects to produce vegetable oil – not in competition with the food value chain – to supply its biorefineries.

Moreover, since 2023, Eni participates through its subsidiary Eni Plenitude in the Solar Stewardship Initiative launched for the photovoltaic industry by the Solar Power Europe Association. This initiative drew together manufacturers, developers, installers, and buyers across the global solar value chain to promote responsible production, procurement and management of materials used to produce solar photovoltaics panels and equipment.

## CONSULTATION

Eni’s organizational and business structure has highly integrated its policies and processes, which stem from Eni SpA and are applied across the Eni Group. All Eni Group’s subsidiaries, including but not limited to those falling within the scope of application of the relevant slavery statement laws, adopt Eni’s central policies, including the present Modern Slavery Statement. The Board of Directors of each subsidiary adopts this Statement, which is then published on subsidiary’s website, if available, or available to respond to any requests from interested stakeholders.

Efforts to prevent slavery risks within and around the Company similarly consist of an integrated process involving the collaborative work of various specialised units and departments. These include the following functions: Sustainability, Integrated Compliance, Internal Audit, Procurement, Integrated Risk Management, Human Resources, and Eni Corporate University. Under the Sustainability Function’s

lead, each of these units and departments was involved in preparing and drafting this Statement to ensure that the document reflects accurate and updated information.

Moreover, the human rights due diligence model, adopted by Eni SpA at the central level and managed by the Sustainability Function and the Integrated Compliance Function, each for their area of concern, operates through integrated information flows from internal functions and Group’s subsidiaries to the Sustainability and the Integrated Compliance functions. This includes, for instance, the involvement of the Internal Audit Function in the quarterly analysis of whistleblowing reports received concerning human rights and the evaluation – in consultation with the subsidiaries – of potential remedial measures, the analysis carried out by the procurement function on any potential risks identified in the activities carried out by suppliers and the evaluation – also with the support of the subsidiaries – of remedial measures. Another example is the collaborative work of various functions, including the Compliance business support, Negotiations and the subsidiaries, to include standard human rights clauses in all contracts with third parties (including Joint Operating Agreements and Petroleum Contracts), which require, among others, all Parties of such agreements to avoid/prevent child labour, forced labour, and slavery practices as well as ensure decent work conditions and labour rights.

## MOVING AHEAD

Eni is carefully following the legislative developments occurring at EU level in relation to human rights due diligence, such as the Regulation prohibiting products made with forced labour on the European Union market and the Directive on Corporate Sustainability Due Diligence (CSDDD). Over the years, Eni has been structuring and implementing human rights processes in line with international standards and best practices, with a particular focus on the United Nations Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises, from which the CSDDD draws inspiration. Eni has therefore been laying the groundwork to further strengthen such processes in anticipation of any new applicable laws that will be adopted in business and human rights.

The international standards mentioned above are the cornerstone of the ongoing process started with the adoption of the Eni Policy on respect for human rights, which aims at designing a human rights compliance program focused on a risk-based approach to respect human rights in all Eni’s processes.

Eni will continue to promote training initiatives among employees and suppliers to strengthen awareness and share knowledge on respect for human rights and issues related specifically to modern slavery. As well, Eni will continue to assess its own suppliers according to the model described above.

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

9. <https://www.ipieca.org/resources/good-practice/labour-rights-risk-identification-in-the-supply-chain/>.

This statement refers to the entire Eni Group<sup>10</sup> (herein referred to as "Eni", "it", or "its") in accordance with the UK Modern Slavery Act 2015, in particular with Article 54, and the Australian Modern Slavery Act 2018, in particular with section 14. It describes the steps taken by Eni during 2024 to prevent slavery and human trafficking in its supply chain or in any part of its own business<sup>11</sup>. A list of the Group's companies to which there is a disclosure obligation according to one or both regulations (UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018) is in the Annex.

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

This Statement has been approved by the Board of Directors of Eni SpA, April 23<sup>th</sup>, 2025.

This Statement was approved by the Board of Directors of Novamont SpA on June 3<sup>rd</sup>, 2025.

/s/ Catia Bastioli

Catia Bastioli  
CEO of Novamont SpA

/s/Claudio Descalzi

CEO Eni SpA

Date: 23<sup>th</sup> April 2025

10. Eni Group refers to the parent company Eni SpA and its consolidated subsidiaries as identified in the Annual Report.

11. Annex A lists Eni subsidiaries that fall within the scope of application of the Modern Slavery Act 2015 and/or the Australian Modern Slavery Act.

## Annex A

### **LIST OF ENTITIES FALLING WITHIN THE SCOPE OF APPLICATION OF THE UK MODERN SLAVERY ACT 2015 AND/OR AUSTRALIA MODERN SLAVERY ACT 2018 AND REQUIRED TO COMPLY WITH THE REPORTING OBLIGATIONS THEREUNDER (WHO THUS FORMALLY ADOPT ENI SPA STATEMENT BY THEIR OWN BOARD OF DIRECTORS' RESOLUTION):**

*Versalis SpA; Eni International BV; EniProgetti SpA; Eni International Resources Ltd; Eni Global Energy Markets SpA; Eni Trade&Biofuels SpA; Novamont SpA; Finproject SpA; Eni Plenitude SpA Società Benefit; Enilive SpA; Eni UK Holding Plc; Eni UK Limited; Eni JPDA 03-13 Limited; Eni Australia BV; Burren Energy (Egypt) Limited; Burren Energy India Limited; Burren Energy Plc; Eni Ambalat Limited; Eni Arguni I Limited; Eni Australia Limited; Eni BTC Limited; Eni Bukat Limited; Eni CBM Limited; Eni Côte d'Ivoire Limited; Eni East Ganai Limited; Eni East Sepinggan Limited; Eni Ganai Limited; Eni Hewett Limited; Eni Hydrocarbons Venezuela Limited; Eni India Limited; Eni Indonesia Limited; Eni Investments plc; Eni In Amenas Limited; Eni IS Exploration Limited; Eni Lasmo plc; Eni Liverpool Bay Operating Company Limited; Eni LNS Limited; Eni Middle East Limited; Eni North Ganai Limited; Eni Oil Algeria Limited; Eni Rapak Limited; Eni TNS Limited; Eni UHL Limited; Eni ULT Limited; Eni ULX Limited; Eni West Ganai Limited; Eni West Timor Limited; Eni Yemen Limited; Liverpool Bay CCS Limited; Bacton CCS Limited; Eni CCUS Holding Limited; Eni Peri Mahakam Limited; Eni Energy Group Limited; Eni Energy Group Midco Limited; Eni Energy Group Holdings Limited; Eni Energy Finance Limited; Eni Energy Group Resourcing Limited; Eni Tellus CCS Limited.*