

Eni's position on Conflict Minerals

Overview



In this document:

- Eni's position on Conflict minerals published in compliance with the regulations of the United States Securities and Exchange Commission (US SEC), only in English
- standards, procedures and guidelines that we adopt, and Eni's suppliers have to adopt
- initiatives and measures to monitor and evaluate the chain of custody and the supply of conflict minerals necessary to the production process or the functionality of our products
- the link to the form to fill in to report any violations of our guidelines.

Eni pursues the objective of reducing the risks of financing human rights violations in connection with the extraction, production and supply of certain minerals in conflict areas of Central Africa subject to the influence of illegal armed groups. The conflict areas are those located in the Democratic Republic of the Congo and neighbouring countries, as defined by Rule 13p-1 under the Securities Exchange Act of 1934 adopted by the U.S. Securities and Exchange Commission "US SEC". Minerals from conflict zones "conflict minerals" are defined as cassiterite, columbite-tantalite, wolframite and gold, including their derivatives tin, tungsten and tantalum collectively known as "3TG", which are often the cause of forced labour and other violations of human rights, and their supply chain is exposed to risks of funding armed groups in those areas. Eni's position on Conflict minerals is published in compliance with US SEC regulations (only available in English).



Background

Eni supports the goal of preventing the exploitation of minerals for the purpose of funding or supporting human rights violations. In the Democratic Republic of the Congo ("DRC") region, human rights violations have been found to be partially financed by the exploitation and trade of the Conflict Minerals.

Our position

As part of Eni's commitment to corporate sustainability and respecting and promoting human rights in our operations and supply chain, including the activities performed by our Business Partners, Eni has in place guidelines, procedures and standard contractual terms & conditions that:

- Require compliance with human rights as prerequisite for qualifying to do business with us
- Require compliance with the Eni Code of Ethics and human rights standards as contractual obligations towards Eni
- Require periodical checks of compliance with those standards through audits.

We believe that Eni's utilization of Conflict Minerals is immaterial to our operations and final products. Our main E&P business segment does not make use of Conflict Minerals. The same applies to our business segments that engage in the supply and sale of natural gas and in power generation from gas-fired plants as well as from renewable sources. Finally, our refining and marketing segment manufactures fuels and lubricants that may contain traces of conflict minerals as these minerals are intentionally added to the production process in the form of catalysts and may not be washed out completely from the finished products. For any of our products that contain or may contain Conflict Minerals, we will expect our suppliers (and will require suppliers to pass the same requirements on to their suppliers) to acknowledge and agree to our guidelines and procedures, including our Code of Ethics and Eni's Statement on respect for human rights. Our standard contractual terms regarding the supply of products that contain or may contain Conflict Minerals include binding and clear-cut requirements regarding Conflict Minerals and responsible sourcing. Suppliers have a contractual obligation to represent that all Necessary Conflict Minerals intentionally added to the products supplied to us are sourced in accordance with the principles of a responsible supply chain. This to support Eni's effort to use for its products minerals that do not directly or indirectly finance or benefit armed groups in the DRC region or further human rights violations. Our relationship with our suppliers is evaluated on an ongoing basis, taking into account their commitment in collaborating with Eni in building a responsible supply chain.

Eni's measures

Due to the complexity of our supply chain, although we have made progress in implementing policies and procedures to help ensure responsible sourcing of Conflict Minerals, it will take us a significant additional investment of time and resources to determine the countries of origin, the mines and manufacturing facilities where our Necessary Conflict Minerals were sourced or processed, with the greatest possible level of specificity. To date, we have implemented several initiatives to determine the source, the production facility and chain of custody of our Necessary Conflict Minerals, which we deem to be necessary to the functionality or the manufacturing of our products.

These include:

- We have established a "Conflict Minerals Compliance Program" to trace the supply chain of our Necessary Conflict Minerals utilized in the manufacturing of our products. We are developing this



program based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and we will take into account other international standards as appropriate;

- We have urged our relevant suppliers to implement a policy regarding responsible sourcing of Conflict Minerals, including the exercise of due diligence to investigate the countries of origin, mines and smelters or refiners “SORs”, where these minerals have been sourced or processed. To date almost all our suppliers of conflict minerals have adopted a policy regarding responsible sourcing and have made progress in tracing their respective supply chains. We have obtained representations that several SORs in our supply chain are certified as conformant to the relevant Responsible Minerals Assurance Process (“RMAP”) standards of the Responsible Minerals Initiative;
- We have engaged with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. Our suppliers’ willingness to comply with this initiative is a factor in our sourcing decisions;
- Since the start of the compliance program, we have included in all new supply contracts entered into by the Eni Group regarding products that contain or may contain conflict minerals updated purchasing terms and conditions to reflect this policy;
- We have a risk management plan to address concerns that a supplier may be providing to Eni Necessary Covered Minerals sourced from the Covered Countries. If a supplier indicates that it may have sourced Necessary Covered Minerals from the Covered Countries, we follow up with the supplier to gather more information, including the basis for the information provided and other information regarding the sourcing country and SORs or mines. Identified risks are reported to the Group Compliance Department, which determines appropriate follow-up actions, if any, to mitigate risks. In 2021, there have been no instances of identified high risk issues in the supply chain that required follow-up actions to be considered;
- We are adopting procedures and controls and we are implementing training activities in order to raise internal awareness of the conflict minerals issues and accurately report on the Company’s activities regarding conflict minerals use and sourcing;
- We endorse transparency in implementing this policy and we make available reports on our progress to relevant stakeholders and the public.

We will continue planning and implementing steps to determine the use, source and origin of any necessary Conflict Minerals utilized by us.

Grievance and whistle-blowing mechanisms

- Concerns and violations of this policy can be reported to Eni via existing grievance channels for ethics or compliance violations
- at <https://www.eni.com/en-IT/about-us/governance/reporting-form.html>.

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