



**SLAVERY AND HUMAN**

**TRAFFICKING STATEMENT 2025**



# ENI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

## 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

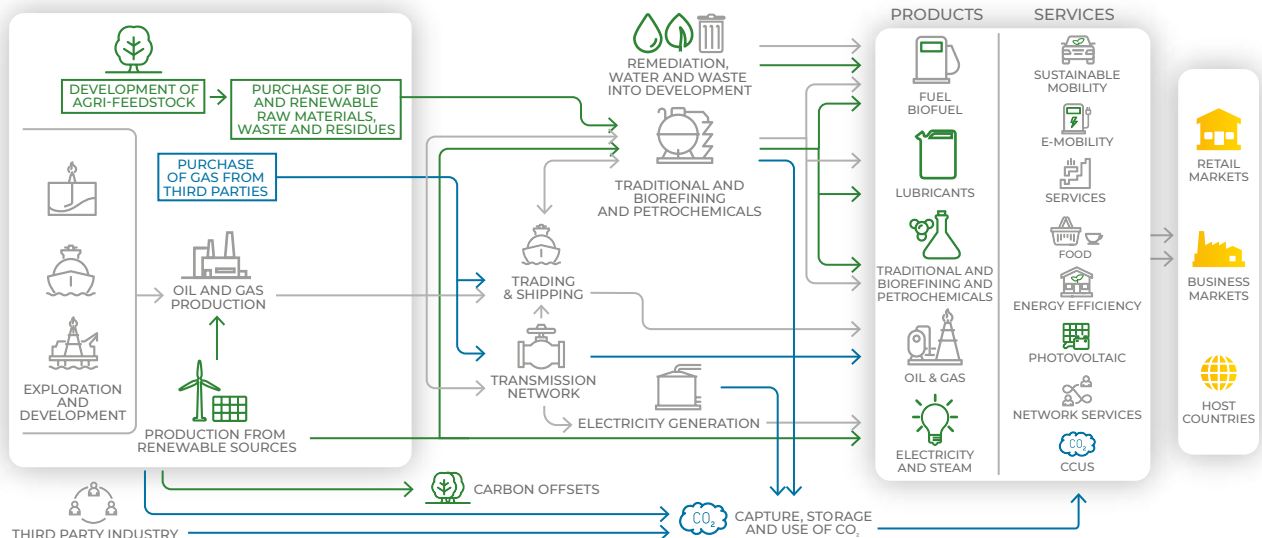
UN Guiding Principles on Business and Human Rights (UN-GPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Eni is committed to maintaining and improving its practices to act against slavery and human trafficking in its operations and along the supply chain. Eni 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

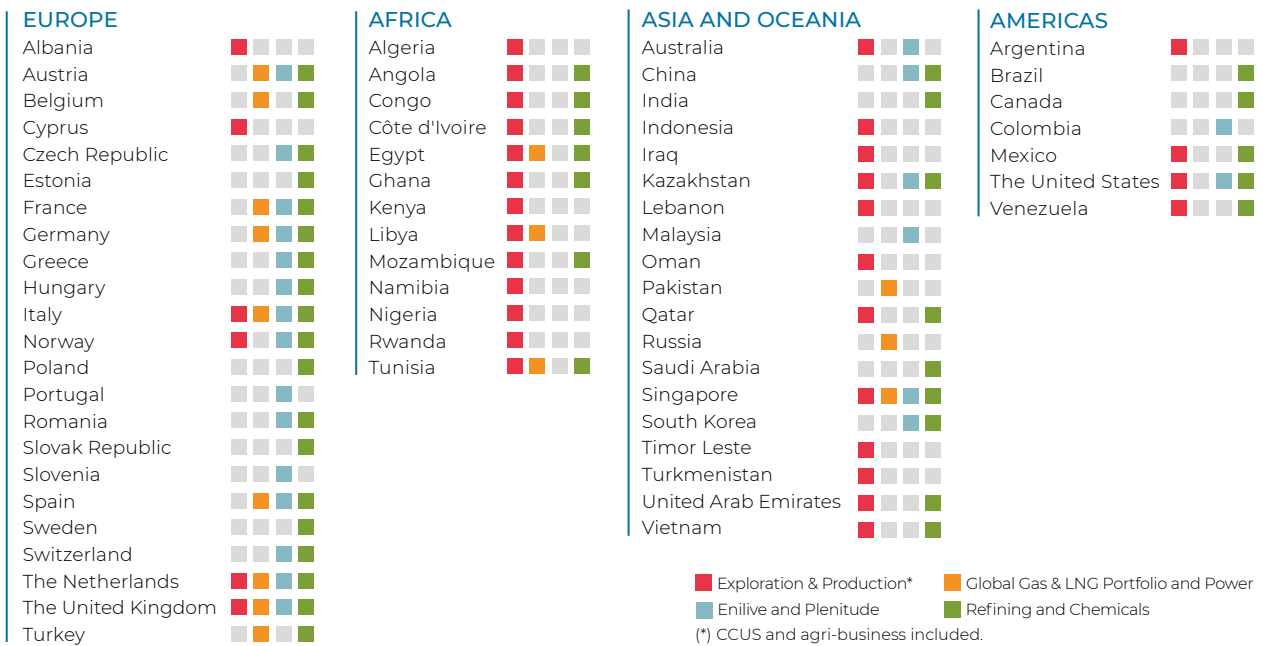
Eni is an energy company, integrated along the entire value chain, operating in 62 Countries worldwide with over 32 thousand employees. It has a significant presence in the traditional activities of exploration and production of conventional oil and gas and in the marketing of gas/LNG through an extensive supply portfolio. Eni is also engaged through innovative business models in the development of new energies and decarbonisation services: renewable from solar/wind, biofuels, biochemistry, CO<sub>2</sub> capture/sequestration and research lines on new energy paradigms (magnetic fusion, chemical recycling of plastics). Eni has large customer base of both industrial and end-user customers. The Group's distinctive strategy is founded on competitive advantages, 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 de-

velopment and the establishment of independent entities in synergy with qualified partners, in focused geographic areas, to pursue development opportunities and profitability. In the downstream oil/petrochemicals industry, a major process of transformation and reconversion is underway. 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. The effective execution of the strategy is based on financial discipline in costs and investments and a robust capital structure, with the help of solid corporate governance and risk identification and management processes, allows for continued investment in the business and competitive returns to shareholders.

## ENI'S VALUE CHAIN



## Eni's presence worldwide

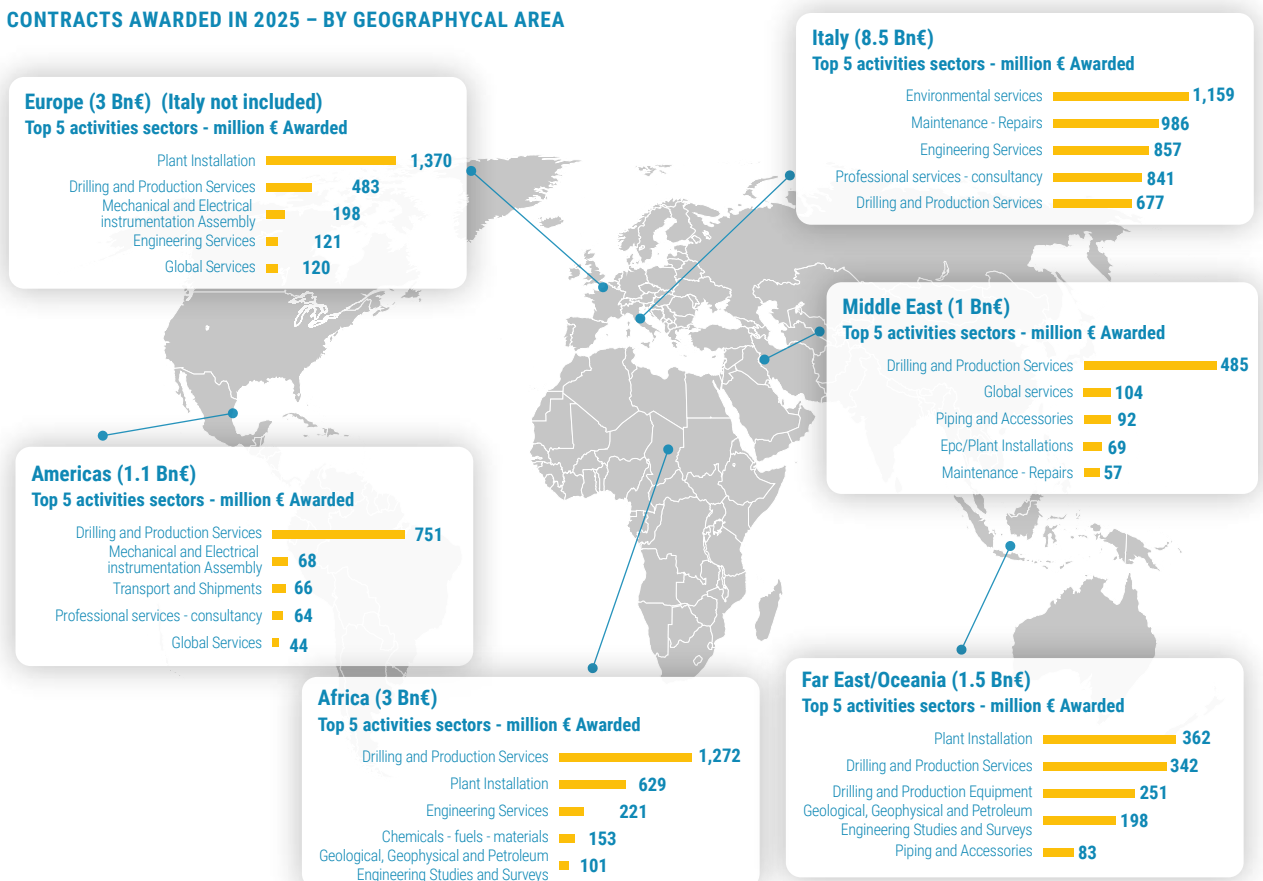


## Eni's supply chain

Eni's operations are supported by a global supply chain for the procurement of capital goods, raw materials, works and services from all over the world. In 2025, the main assets procured were logistics support for the well area and ancillary services, offshore installations, engineering services

for the oil and gas sector, professional services and well drilling services. In 2025, procurement spending amounted to approximately 18.2 billion euros, with 15,396 contracts awarded worldwide by its procurement departments around the world.

## CONTRACTS AWARDED IN 2025 - 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 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 within their respective area of responsibility, 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” (hereinafter “Salient Issue”). For more details on Eni’s Corporate Governance, please refer to the 2025 Corporate Governance and Shareholding Structure Report and the 2025 Annual Report - “Governance” section, and to [Eni for Human Rights 2024](#) regarding specifically the human rights governance.

### Policies and rules on human rights

Eni’s work is guided by the values and principles described in the **Code of Ethics**, in the ECG Policy “**Respect for Human Rights in Eni**”, and in the **Codes of Conduct** for third parties. 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 requires operating with respect for the dignity of people and human rights, it provides for the refusal of all forms of forced and/or child labour, it enunciates Eni’s commitment to defining and disseminating policies, standards and rules that guide the actions of

its suppliers and partners towards respect for human rights and its principles of sustainability. The Code of Ethics 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 any third party who collaborates or works in the interest or on behalf of Eni. Therefore, Eni expects all stakeholders to adopt socially responsible conduct and implement ethical programs aligned with the principles of its Code of Ethics.

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; it 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, capitalising 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 Salient Issues, the most significant issues in consideration of the business activities and the characteristics of the 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 for human rights in the workplace, the Policy outlines clear rejection of any form of forced or compulsory labour as well as any exploitative labour practices among with, for example: human trafficking, restriction of freedom of movement and seizure of identity documents. Eni expects third parties, including own suppliers, to observe the principles set out in the Policy and the specific commitments Eni has made.

Sustainability Function and Integrated Compliance Function ensure, each within their respective area of responsibility, 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, Corporate Social Responsibility and a Just Transition (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 last renewed in 2026 by Eni, IndustriALL<sup>1</sup> Global Union and FILCTEM CGIL, FEMCA CISL and UILTEC UIL<sup>2</sup> trade unions. The international and European labour delegates and the Parties of the Agree-

1. Organization that represents more than 50 million workers distributed in 130 Countries, in the energy, manufacturing and mining sectors.

2. Main Italian trade union organizations.

ment 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 themselves.

The **Suppliers' Code of Conduct** sets Eni's expectations on suppliers regarding compliance to internationally recognised 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 respect 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.

The **Agri-Feedstock Code of Conduct**, sets out the ethical and operational principles for those operating within the agricultural supply chain for the production of feedstock, and it is based on two pillars: respect for human and labour rights, and environmental protection, drawing on the principles and commitments that Eni has undertaken through its Code of Ethics and the "Respect for Human Rights in Eni" Policy. The Code of Conduct commits Eni's business partners to ensure that human rights are also respected by sub-

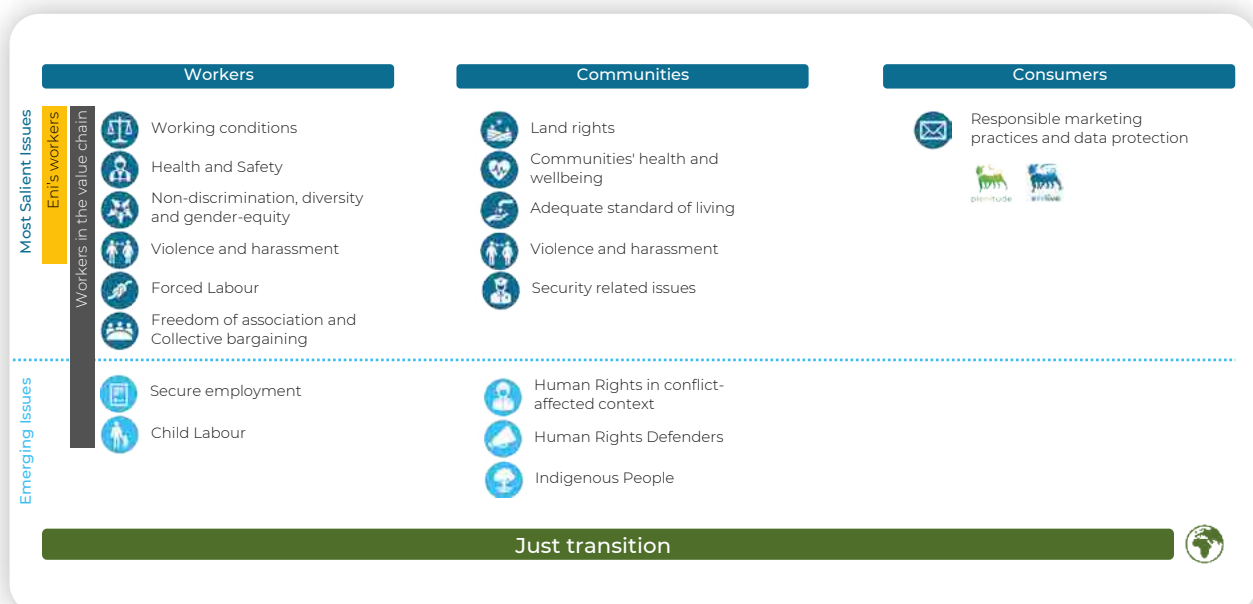
contractors and third parties involved in the performance of their activities.

## 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 OECD Guidelines for Multinational Enterprises, 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 multi-disciplinary, multilevel, and integrated at any level of Company's processes. Human Rights Due Diligence follows a risk-based approach to identify, prevent, mitigate, and cease adverse corporate impacts on human rights. The risks identified through 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 context in which it operates. These Salient Issues, identified for the first time in 2017, were updated during 2024. The update was conducted through the involvement of over one hundred people from various Eni's 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



Furthermore, during 2024, the first compliance risk assessment on the 'human rights' area was completed. The activity was 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, in line with the identified Salient 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 risks associated to the Country and the number of Salient Issues) and the level of "residual risk" on the basis of the existing mitigation measures (such as internal 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. In 2025, specific in-depth risk assessments were conducted in the field of human rights on the following at risk activities: M&A, Joint Ventures, management of mining rights, Agri-feedstock and Carbon Offset agreements, to optimise the related prevention measures, also through the application of a risk-based approach.

Lastly, risks of potential human rights impacts, e.g. modern slavery, have been 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. Human rights risks are also assessed through a third party provider, namely 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, including 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 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. The model for evaluating the management of human rights in the workplace is also updated in relation to changes in the external and internal regulatory context relevant to Eni, with a view to continuous improvement. The mitigation actions identified as a result of the model application are therefore disseminated to all the human resources managers.

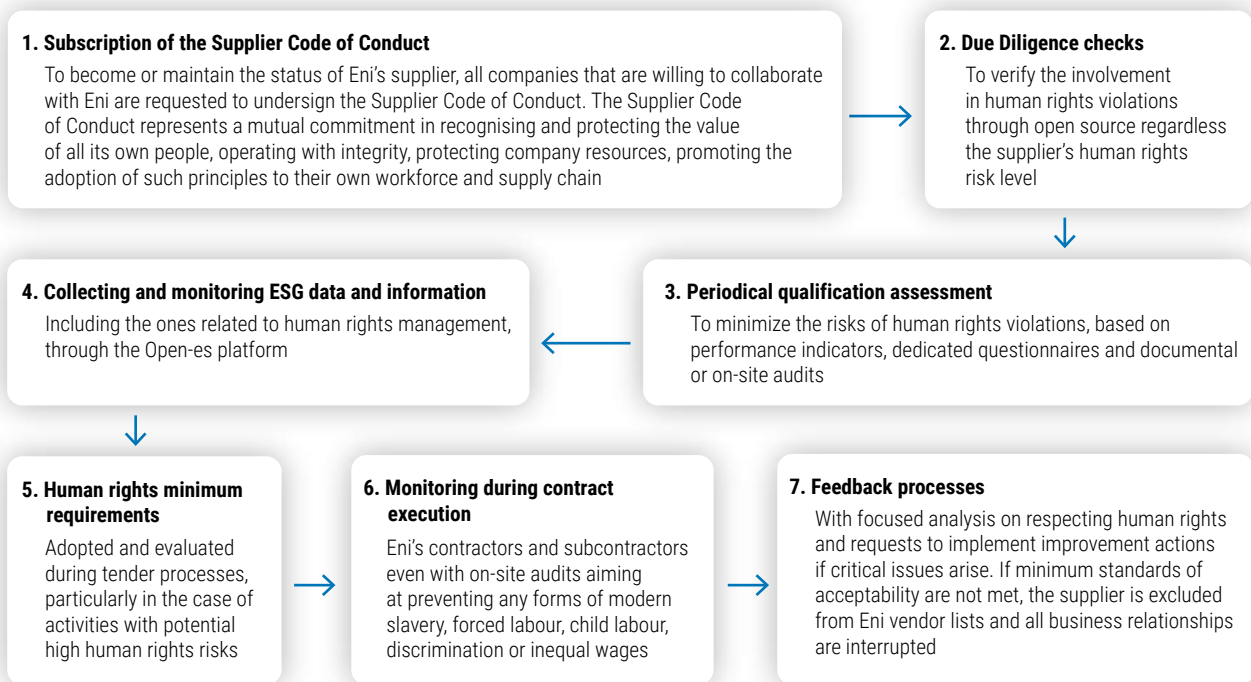
### **Assessing and managing risks along the supply chain**

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 performance and transparent and impartial conduct in selecting suppliers. 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 calculated by combining the supplier's Country and the type of activities performed, among which those considered most at risks include industrial activities - such as maintenance, construction, assembly - and general services - such as cleaning, catering and security. The model outlines differentiated control measures 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. The result is a comprehensive approach for risk identification, prevention, and mitigation at every stage of the procurement process, from the supplier selection to the tender evaluation and performance monitoring along the entire supply chain, as described in the table below.

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

## CONTINUOUS EVALUATION OF SUPPLIERS DURING THE PROCUREMENT PROCESS



At global level, more than 1,000 suppliers were assessed in 2025, combining both document-based reviews and on-site audits. Suppliers that have shown relevant shortcomings have been limited to participating in Eni tenders and corrective action plans have been agreed with them to ensure respect for human rights. Most of the recurring gaps identified across the assessments were related to the management of subcontractors - an area particularly exposed due to the varying levels of awareness on these topics and the diverse size of the companies involved. In addition to cross-cutting initiatives across the supply chain focused on training and raising awareness on the responsible management of the value chain, involving all companies collaborating with Eni, in 2025 Eni conducted a targeted activity on a cluster of suppliers characterized by highly complex supply chains, with the aim of deepening the understanding of how they assess environmental, social and governance aspects within their own vendor networks. The initiative pursued a twofold objective: on the one hand, to encourage these suppliers to take greater responsibility for their role in ensuring responsible supply chain management; on the other, to explore how they carry out due diligence on counterparties that do not have a direct relationship with Eni. The analysis highlighted several areas for improvement, which led to the definition and sharing of corrective action plans with some of the suppliers involved. This activity forms part of Eni's broader approach to responsible supply chain management and complements the established framework for managing human rights-related aspects described in the previous section.

More in detail, the application of the risk-based model in 2025 led to the identification of Congo, Tunisia and Indonesia as the Countries with the highest number of suppliers with active contracts classified at risk (medium,

medium-high and high), to whom the control measures described have been applied.

In this context, a notable example related to the application of the risk-based model is represented by a situation emerged in Algeria from the monitoring of respect for workers' rights and respect for the minimum human rights requirements during the contract execution: in 2025 a delay in the payment of wages by a contractor was detected. Eni intervened promptly to ensure that contractual obligations were fulfilled, introducing several measures including closer and more frequent monitoring of the contractor's performance in coordination with the contract manager. These actions are also aimed at strengthening the supplier's awareness and capabilities in this area. The supplier was subsequently included in a watchlist and subject to conditional engagement. These measures enabled the outstanding wages to be paid. As a precautionary step, Eni also launched a new tender process for the service, from which the contractor will be excluded due to the shortcomings identified.

In addition to the risk-based and related measures described above, and in line with the principles of "responsible contracting" reflected in the best practices and international guidelines on business & human rights, Eni implements a system of standard clauses on human rights - applied on a risk-based approach - for specific types of contracts that it enters and provides support to the business for their definition and negotiation.

Standard clauses are not applied automatically; rather, they require a case by case assessment by the relevant unit within the Integrated Compliance Function, for example in the context of joint ventures, M&A transactions, social projects, Agri-feedstock initiatives, or Carbon offset 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.

### **Specific measures applied to the agri-business and to the purchase of biomass**

During 2025, particular attention was paid to agricultural initiatives (agri-feedstock projects) focused on the production of vegetable oils for use in biofuels, and to biomass procurement chains. Eni's agri-feedstock model can help generate socio-economic benefits for the local communities involved, at the same time, the specific nature of these activities has necessitated the establishment of a specific framework of measures to ensure proper management of potential human rights issues that mainly characterise any agricultural supply chains (e.g. risk of informal employment, forms of labour exploitation and child labour, violence and harassment at work, occupational health and safety, and other working conditions). This dedicated framework was implemented during the year through specific support activities for subsidiaries in the initial application of the measures, particularly in Kenya, Congo, Angola and Mozambique.

The framework includes a number of cross-cutting measures, including the adoption of a specific Agri-Feedstock Code of Conduct setting out the ethical and operational principles for those operating within the agricultural supply chain for the production of feedstock - referring to the principles and commitments that Eni has undertaken through its Code of Ethics and its Policy on "Respect for Human Rights in Eni". Adherence to this Code of Conduct is underpinned by a structured process of screening and selecting business partners, as well as contractual safeguards, to ensure respect for human rights throughout the agricultural supply chain, as well as the possibility of being subject to audits to ensure that business partners comply with Eni's human rights commitments. The framework also comprises specific measures, including human rights training for Eni's agricultural partners and agricultural supervisors, who took part in dedicated events throughout the year, supported by the provision of guidelines and operational tools designed for field monitoring activities. In addition, a pilot of third-party technical audit has also been launched to verify compliance with human rights throughout the agricultural supply chain.

The implementation of the measures set out in the Framework in the countries where agri-feedstock initiatives are present will continue in 2026.

In 2025, 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 2025 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 at risk in terms of potential human rights impact. The Sustainability Function 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 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.

## TRAINING AND AWARENESS

Training for Eni employees on human rights comprises cross-cutting initiatives covering the Company's regulatory framework (e.g. the Code of Ethics, Zero Tolerance Policy, HSE procedures, etc.), a specific course on business activities and human rights, thematic modules for Eni staff involved in processes with particular exposure to human rights issues (e.g. resource management, procurement, security activities), and workshops and initiatives on specific topics.

### TRAINING ON HUMAN RIGHTS

	Unit	2025	2024
Human rights training hours <sup>(a)</sup>	(hours)	1,544	955
Employees who have received human rights training <sup>(b)</sup>	(%)	76	78

(a) In 2025, as in 2024, the number of training hours completed reflect the absence of large-scale training campaigns during the year.

(b) The indicator is calculated as the ratio between the number of enrolled employees who completed a training course and the total number of enrolled employees.

In addition, specific training initiatives are aimed at Eni's suppliers. In particular, alongside the courses developed by Eni, an online course has also been promoted; this course, comprising 12 modules and developed in collaboration with IPIECA, is designed to raise awareness of

working conditions, facilitate understanding of workers' rights, including specific module on modern slavery risks, and guide the identification, management and mitigation of risks associated with non-compliance with these rights. With regard to security, practical workshops are held an-

nally for security providers; in this context, in order to increase the number of security forces receiving specific training on human rights, in addition to the annual course delivered by a specialist provider in one or more countries, further training workshops on human rights for local security forces were organised in Algeria, Egypt, Ghana, Indonesia, Iraq, Libya, Mozambique and Kenya during 2025 (Train-the-Trainers initiatives).

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 companies on their sustainable development path through a digital and innovative platform. Today, involving more than 40,000 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 valorise suppliers' commitment in enhancing their competences on ESG topics such as managing and mitigating human rights risks, like child labour and forced labour. 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 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.

## KEY PERFORMANCE INDICATORS

	Unit	2025	2024
Suppliers involved in awareness, measurement and collaboration initiatives on ESG topics <sup>(a)</sup>	(number)	9,416	7,512
Active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics <sup>(b)</sup>	(%)	80	70
Value of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics <sup>(c)</sup>		91	82

(a) Number of suppliers registered on the Open-es platform.

(b) Ratio between the total number of active contracts awarded to suppliers registered on Open-es and the total number of active contracts.

(c) Ratio between the total value of active contracts awarded to suppliers registered on Open-es and the total value of active contracts.

## 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”**, in full confidence and without fear of re-

taliation. 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>4</sup>. Among the whistleblowing reports received through the whistleblowing channel in 2025, **Eni has identified no case of modern slavery.**

## WHISTLEBLOWING FILES ON HUMAN RIGHTS VIOLATIONS

	Unit	2025	2024
Whistleblowing files (assertions) on human rights violations - closed during the year <sup>(a)</sup>	(number)	40 (68)	32 (64)
<i>of which: employees<sup>(b)</sup></i>		14	11
Substantiated assertions		16	10
Unsubstantiated assertions/not ascertainable <sup>(c)</sup> /not applicable <sup>(d)</sup> assertions		52	54
Inherent incidents of discrimination		7 <sup>(e)</sup>	3 <sup>(f)</sup>
Whistleblowing files (assertions) on human rights violations with potential socio-economic impacts on local communities		1 <sup>(g)</sup>	0
Whistleblowing files (assertions) on human rights violations with potential impacts on health and/or well-being of local communities		0	1 (2) <sup>(h)</sup>

(a) The indicator refers to whistleblowing files (assertions) relating to Eni SpA and its subsidiaries, closed during the year and concerning human rights.

(b) The data are collected exclusively with reference to non-anonymous whistleblowing reports.

(c) Assertions that do not contain substantiated, precise and/or sufficiently detailed elements and/or for which, based on the investigation tools available, it is not possible to confirm or exclude the validity of the reported facts.

(d) Assertions in which the reported facts coincide with issues already subject to pre-litigation actions, legal proceedings or ongoing investigations by public authorities. The assessment is carried out following the opinion of the Legal Affairs and/or Legal and Labour Disputes function.

(e) Of which one episode showed elements of substantiation.

(f) The alleged episodes of discrimination did not show elements of substantiation.

(g) The allegation relating to the relevant case file did not show elements of substantiation.

(h) Both allegations relating to the relevant case file did not show elements of substantiation.

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

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 it 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 2025 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 rightsholders 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 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>5</sup> participating, among others, in the Social Responsibility Group, the Human Rights Working Group, and the Supply Chain Working Group, where the most relevant issues for the industry are discussed and guidance are prepared.

In 2023, 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, extended in December 2025 also to the Republic of Congo, where Eni is developing Agri-feedstock projects to produce vegetable oil – not in competition with the food value chain – to supply its biorefineries.

Moreover, 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'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 existing), 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 Security. Under the Sustainability Function's lead, each of these functions were 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 within their respective area of responsibility, operates through integrated information flows from internal functions and 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.

## MOVING AHEAD

Eni is carefully following the legislative developments occurring at EU level in relation to human rights due diligence, especially regarding the implementation guidance and tools related to the Directive on Corporate Sustainability Due Diligence (CSDDD) that the EU Commission should issue in the upcoming months, as well as the implication related to the Regulation prohibiting products made with forced labour on the European Union market.

In line with regulatory developments, Eni is also reviewing and strengthening the set of procedures and tools that support the due diligence process.

Eni will continue to assess its own suppliers according to the model described in this Statement, while working to further develop and make available additional tools aimed at strengthening awareness and engagement of companies in the responsible management of human rights.

With the aim of continuing to progressively deepen the analysis of potential impacts associated with specific business activities (as it has been done in 2024 and 2025 regarding Agri-feedstock business and biomass procurement activities), Eni is planning further areas of analysis that could be characterised by specific impacts, including where activities are carried out by third parties.

Finally, Eni will continue to promote training initiatives among employees and third parties to strengthen awareness and share knowledge on respect for human rights, and issues related specifically to modern slavery.

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

This statement refers to the entire Eni Group<sup>6</sup> in accordance with the UK Modern Slavery Act 2015, in particular with Article 54(5), and the Modern Slavery Act 2018 issued in Australia, in particular with section 14. It describes the steps taken by Eni during 2025 to prevent slavery and human trafficking in its supply chain or in any part of its own business. A list of the Group's companies to which there is a disclosure obligation according to one or both regulations 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 own 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; Human rights due diligence and risk management; Training and awareness; 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 entity 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>rd</sup>, 2026.

This Statement has been approved by the Board of Directors of Versalis S.p.A., May 29<sup>th</sup>, 2026

/s/ Adriano Alfani

Adriano Alfani  
CEO Versalis S.p.A.

/s/Claudio Descalzi

Claudio Descalzi  
CEO Eni SpA

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

## **Annex A**

**LIST OF ENTITIES FALLING WITHIN THE SCOPE OF APPLICATION OF THE UK MODERN SLAVERY ACT 2015 AND/OR MODERN SLAVERY ACT 2018 ISSUED IN AUSTRALIA, 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 Tellus CCS Limited; Eni Gambia Limited; Eni Uruguay Limited; LNG Shipping SpA.*