17/09/2026

Object: Eni's contribution to BHRRC research on Human Rights Defenders

Eni's responses:

1. *Please provide one or two examples that demonstrate how your company has identified, assessed, and mitigated risks to Human Rights Defenders through its human rights and environmental due diligence processes since the adoption of your commitment.*

According to the Policy on Respect for Human Rights in Eni (below the Human Rights Policy), the company is committed "to verifying and providing remedy, including through cooperation with Third Parties, in case of adverse Human Rights impacts it might have caused (or contributed to causing) to workers and communities, and to make all efforts towards this objective in cases where the impact is directly linked to its operations, products or services. Eni does not prevent access to judicial or non-judicial mechanisms or to institutional mechanisms in any way. Eni also undertakes to leverage its influence on Third Parties so to ensure that any adverse impacts directly related to their activities are remedied. Accordingly, Eni prohibits and acts to prevent retaliation against workers and other Stakeholders that raise Human Rights concerns, and neither tolerates nor contributes to threats, intimidations, retaliations or attacks (both physical or through lawsuit) against Human Rights defenders and affected Stakeholders in connection with its operations. Lastly, Eni is committed to collaborating with Human Rights defenders in order to create opportunities for engagement and discussion at local and international level."

In this context:

- when starting new projects, the internal process which leads to project approval foresees a careful stakeholder mapping to identify stakeholders potentially impacted by the project itself and the appropriate strategies to engage with. Indeed, such stakeholders are involved in an ad-hoc engagement before the project starts, to collect their views and concerns, providing them with a constant update during projects execution and operation. In addition, where required, such as in case of industrial projects considered to be at higher risk, specific Human Rights Impact Assessments (HRIA) are also performed. As part of these assessments, dedicated consultations and focus groups with rightsholders are carried out by consultants appointed by the company to execute the HRIA: during such engagements, held by external consultants only and without company representatives, rightsholders can raise concerns which will be duly considered in the HRIA findings report and in the associated action plan. Details of participants are not shared with the company.

- the company has in place also 'Grievance Mechanisms' which allows the proper management of requests or complaints. To guarantee complainants having adequate access to the mechanisms, multiple access points are established, and parties have been given adequate notice of the mechanism's establishment. Grievances can be transmitted, for instance, through online channels, including dedicated email addresses and institutional websites of local companies, or physically at the administrative/operational headquarters, through collection boxes located in areas where Eni's projects are located, as well as by engaging the

Community Liaison Officers or through trusted third parties (NGOs, local associations, etc.). The confidentiality of the content of the grievance is safeguarded in a way that protects the anonymity of the claimant, without any adverse consequences for the claimant.

Latest HRIAs carried out by the company and grievances analysis did not highlight specific risks for HRDs.

2. *What steps does your company take to ensure that affected or potentially affected stakeholders - including local communities, Indigenous Peoples, workers, and civil society organisations - are aware of its commitments regarding Human Rights Defenders? Please provide an example of how these commitments have been communicated in practice.*

As part of the processes described above, company's commitment to respecting human rights, as set out in its Human Rights Policy and including references to its commitment to Human Rights Defenders, is explained and spread through dedicated presentations and awareness sessions

Company's thematic report on Human Rights (Eni for Human Rights, pp. 41-42) describes the process through which consultations are conducted and the tools used for that purpose.

3. *What steps does your company take to ensure that business partners - including suppliers, contractors, and other relevant business relationships - understand and respect its commitments regarding Human Rights Defenders? Please provide an example of how a business partner has engaged with or implemented these commitments.*

Eni's Human Rights Policy, including its commitment towards Human Rights Defenders, is publicly available on the company's website and is communicated to relevant counterparties through dedicated contractual clauses under which counterparties undertake, among other things, to acknowledge and comply with the principles and commitments set out therein.

4. *Please provide an example of how a Human Rights Defender or affected community member safely raised a concern related to your company's operations, projects, or business relationships, and describe the steps the company took to address the concern and prevent retaliation.*

The process in place to raise concerns related to Eni's operations and address them are duly described in the company report dedicated to Human Rights (Eni for Human Rights, pp. 50-55). Depending on the grievance severity level, the internal procedure specifically describes different processes of sharing and approval of grievance resolution proposals. This in order to ensure that the management of low severity grievances is more timely, and to ensure the involvement of top management in the high severity cases. The access to grievance register is limited to authorized personnel, with the confidentiality of the content of the grievance

safeguarded by protecting the anonymity of the claimant, without any adverse consequence for the claimant. The report Eni for Human Rights also includes some specific case studies of engagement and actions implemented to address concerns raised from affected community members in relation to the development of industrial projects in Mexico, Congo and Ivory Coast (pp. 46-48)

Moreover, Eni cooperates with other judicial and non-judicial mechanisms, among them the national contact points established under the OECD Guidelines for Multinational Enterprises, adopting an approach based on dialogue and cooperation whenever concerns are raised.