Eni's response to BHRRC's "Invitation to respond – Ukraine & Russia human rights due diligence survey", dated 8 march 2022

Regarding our direct activities, as stated in Eni's <u>website</u>, Eni has been operating in Russia since the 1960s, when we first began importing crude oil and gas into Italy. Eni currently has a marginal presence in Russia. The existing Joint Ventures with Rosneft, linked to exploration licenses in the Arctic area, have frozen all operations for a number of years, due also to the international sanctions imposed after 2014 under the Ukraine/Russia-related sanctions programs by the United States and the EU.

Eni has communicated its intention to sell its share in the joint and equal shareholding with Gazprom in the Blue Stream gas pipeline Company (connecting Russia to Turkey). This is notwithstanding the fact that activities related to this gas pipeline are not targeted by the newly introduced sanctions against Russia, which currently do not prohibit gas transportation nor gas supply. As per the Global Gas & LNG Portfolio in 2020 the gas supplied in the country amounted to 22.47 bcm. Eni is not present in Ukraine.

Furthermore, as communicated to the <u>press</u> on March 9 2022: "Eni has suspended the stipulation of new contracts related to the procurement of oil and oil products from Russia and it will fully honor every decision taken by the European and Italian institutions".

Consistently with the reduced activities, Eni's staff in the country is composed by just a few people. Most of the expatriate resources returned to their home countries (Italy) while local resources remained in service. Continuous contact was ensured with all of them through the line structures to which the subsidiaries of Eni SpA in Russia refer. The HR functions also ensured contact with resources of Ukrainian and Russian nationality who operate in other countries and companies controlled by Eni SpA.

Eni and its subsidiaries have adopted and implemented policies and procedures that are designed consistently with legal requirements and best practices in order to prevent any violation of sanctions that may apply to its operations. Such internal compliance measures include the screening of third parties against relevant sanction lists, employees' training programs tailored with a risk-based approach and the appointment of organizational structures dedicated to monitoring the legal framework, keeping updated internal procedures and evaluating and mitigating risks relating to specific transactions. Eni is strictly committed to abide any applicable sanctions including those recently issued in respect of the recent Ukraine crisis.

In addition, within its human rights due diligence process, Eni performs ad-hoc screening on its potential business partners aimed at scrutinizing them on their eventual involvement in human rights violations. Detailed information on the overarching approach to human rights are reported in our annual report "Eni for human rights".

Eni's CEO Claudio Descalzi on March 8 2022 posted the following message on the <u>social media</u>: "Like everyone, I am following the invasion of Ukraine with great sadness and concern. This conflict is destroying lives and livelihoods and provoking a humanitarian crisis in Europe the likes of which we hoped we would never see again. I, and all my colleagues in Eni, stand with the people of Ukraine who deserve our thoughts and our solidarity. Together with the Italian government, we are working with our upstream partners and alliances to identify and secure alternatives to the Russian gas that we require for our energy security. We also continue to develop new renewable sources leveraging the proprietary technologies that we have developed over many years. We hope that a peaceful solution can be found as a matter of urgency, and that civilians caught up in this conflict can be provided with the immediate safety and protection that they so desperately need."

Currently Eni's people are taking part in a <u>fundraising initiative</u> in collaboration with the Italian Red Cross, The company will double the hours donated and donate them to the Red Cross to tackle the emergency. This small shared gesture aims to express solidarity with the people of Ukraine, so terribly affected by the current conflict.