

Company Name Eni
Industry Extractives
UNGP Core Score (*) 25.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
2	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
2	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
2	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
2	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
25.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: In its Statement on respect to Human Rights, the Company indicates: 'Eni is committed to respecting human rights in its own operations and expects its Business Partners to respect the aforementioned rights with regard to the activities assigned to or carried out with them as well as to the activities they may carry out in Eni's interests. Eni reaffirms its commitment to respect the human rights contained in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the other applicable human rights as set out in international Treaties and Standards. Eni adheres to the UN Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ten principles of the United Nations Global Compact.' [Statement on respect to Human Rights, 12/2018: eni.com] • Met: UNGC principles 1 & 2: See above [Statement on respect to Human Rights, 12/2018: eni.com] • Met: UDHR: See above [Statement on respect to Human Rights, 12/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: See above [Statement on respect to Human Rights, 12/2018: eni.com] • Met: OECD: See above [Statement on respect to Human Rights, 12/2018: eni.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: In the Company's Global Agreement on International Industrial Relations and Corporate Social Responsibility it states that it 'is committed to recognizing: Protection of dignity, equal opportunity and non-discrimination - ILO Conventions 100 and 111 [...] Protection of the rights of minors - ILO Conventions 138 and 182 [...] Prohibition of forced or compulsory labour - ILO Conventions 29 and 105 [...] Freedom of association and the right to collective bargaining - ILO Conventions 87 and 98 [...] Non-discrimination against workers' representatives - ILO Convention 135'. [Global Framework Agreement on International Relations and Corporate Social Responsibility 2019, 21/6/2019: eni.com & Statement on respect to Human Rights, 12/2018: eni.com] • Met: Explicitly list All four ILO apply to EX BPs: The Company's statement on human rights states that 'Eni takes into account the potential impact on human rights deriving from activities carried out by Business Partners in the management of its business relations and plan specific measures in this regard. Eni expects its Business partners to respect the principles and content of this statement and makes all reasonable efforts to include contractual obligations to respect human rights into its agreements with them when working for or together with Eni. Eni undertakes as far as possible, to ensure that the principles included in this Statement are integrated into the internal legal framework of the Joint Ventures in which it participates'. As indicated below, the Company is committed to each ILO core area. [Statement on respect to Human Rights, 12/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: In its Statement on respect to Human Rights, the Company indicates: 'Eni is committed to respecting the four ILO core labour standards as set out in the Declaration on Fundamental Principles and Rights at work: Freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; the elimination of all forms of discrimination in respect of employment and occupation'. The statement also indicates that 'Eni

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			<p>operates in compliance with local laws of the countries where it is present. In the event of obstacles to the implementation of this Statement deriving from divergence between national local laws and its operating standards, Eni shall strive to develop alternative measures aimed at promoting respect for human rights'. [Statement on respect to Human Rights, 12/2018: eni.com]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company states in its Human Rights report that it makes a commitment in its Code of Ethics 'To carry out Eni's activities in compliance with international standards on occupational health and safety and environmental and public safety protection'. [Code of Ethics update, 18/03/2020: eni.com & FOR Human Rights June 2020, 06/2020: eni.com] • Met: H&S applies to EX BPs: See above. As indicated in the Company's statement on human rights, 'Eni's suppliers are contractually required to commit to respecting the principles and international standards of human rights [...] and the Eni code of ethics, as well as the specific health and safety requirements that Eni adopts'. [Statement on respect to Human Rights, 12/2018: eni.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states in its Code of Ethics that it is 'attentive to the needs and expectations of our stakeholders. We are committed to be engaged in continuous dialogue with our counterparts, providing them clear, complete and truthful information, being aware that sharing objectives and results is essential to maximize value and reduce business risks.' Additionally, in its Human Rights Report, it discloses 'Eni's internal regulations recognize that local stakeholders should be engaged through information campaigns and interactive consultation processes that should be carried out from the conceptual design of a project up to operations. [...] Whenever Eni operates in a host territory, the involvement of local residents is promoted through information sessions and community meetings.' [Code of Ethics update, 18/03/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: The Company indicates: 'In 2018, this list of salient issues was shared with external stakeholders and prominent experts in the field of business and human rights, in order to gather their feedbacks and suggestions. These meetings were held with the Institute for Human Rights and Business, IndustriAll, the Italian Inter Ministerial Committee on Human Rights (CIDU), AVSI and Unicef Italia. Besides confirming the initial list of 13 salient issues, this engagement allowed Eni to receive input to strengthen its approach and to get important information on the upcoming issues on Business Human Rights.' Relevant input that came up during the engagement included: 'Issues related to the working conditions of temporary, subcontracted workers, especially those hired locally, who are involved in several phases of the O&G industry (preparation phase, construction, etc.), without enjoying - in some circumstances - the same benefits guaranteed to workers hired by the Company directly; 'Need to keep vulnerable groups' rights at the center of Eni's approach, granting full access to consultations and opportunity to have their voice be heard. Moreover, particular attention should be paid to minors' - especially children - views; Considering the "how" and "when" as crucial features when implementing actions to ensure Human Rights respect and working to social development projects; The paramount importance of CEO activism on BHR discussion, which is expected to take a prominent role in institutional talks. Input and feedback received during these meetings have been integrated in the development and planning of policies and tools, informing both Eni's policy commitment and its due diligence process, strengthening the Company's approach to human rights in these areas'. [Eni FOR Human Rights report 2019, 12/2019: eni.com]
A.1.5	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: In its Statement on respect for Human Rights, the Company commits 'to verifying and providing, or cooperating to provide, remediation in case of adverse human rights impacts it might have caused or contributed to, and to make all efforts to promote the achievement of the same goal in cases where the impact is directly linked to its operations, products or services'. [Statement on respect to Human Rights, 12/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: In its Statement on respect for Human Rights, the Company indicates: 'Grievance mechanisms and other reporting channels, both at operational level and company-wide, are made available to enhance the opportunities for the company to identify and promptly investigate potential and actual human rights impacts and take appropriate action.'

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Furthermore, Eni does not prevent access in any way to state-based judicial or non-judicial mechanisms and co-operates in good faith with such mechanisms'. [Statement on respect to Human Rights, 12/2018: eni.com]</p> <ul style="list-style-type: none"> • Met: Collaborating with other remedy initiatives: As part of its commitment to remedy, the Company states it works in 'Cooperation with judicial or state-based non-judicial mechanisms [...]' and co-operates in good faith with such mechanisms'. The Company gives an example of collaborating with the Italian National Contact Point of OECD Guidelines. [Eni FOR Human Rights report 2019, 12/2019: eni.com] • Not met: Work with EX BPs to remedy impacts: The Company has provided comments to CHRB regarding this indicator. However, evidence does not seem material, as it refers to own remediation. No clear link found to work collaboratively with extractive business partners in remedy provision either through the partners' mechanisms or through the development of third party non-judicial remedies.

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to ILO core. • Met: Senior responsibility for HR: 'Eni Watch Structure acts as the Guarantor of the Code of Ethics, responsible for promoting and verifying the Code's implementation.' It is made up of internal and external members. It's responsible for presenting a report every six months on the Code's implementation and any necessary updates to the Control and Risk Committee, the Board of Statutory Auditors and o Chairmen and CEO of Eni, who reports to the Board. [FOR Human Rights June 2020, 06/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company indicates that the 'Sustainability function is in charge of coordinating Eni's overall approach to human rigghs due diligence and supporting Eni's business/support functions to ensure respect for human rights'. It cooperates with all the Company's functions in finding day-to-day solutions if human rights issues arise. 'The competent local sustainability functions support those in charge of industrial projects and ensure the implementation of Eni's human rights due diligence at local level, including context specific human rights issues such as respect for indigenou peoples' special rights and the responsible acquisition of land, making use of the technical assistance provided by the Sustainability function'. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Day-to-day responsibility for EX BRs: The Company states that several departments share the approach between local subsidiary and the Sustainability department: 'The Sustainability Department supports the negotiators during the bid phase to ensure that human rights are included into the petroleum contracts and Joint Ventures Agreements'. Once the contract is signed, the Eni's subsidiary is responsible for managing all the issues referred to the operations, with the support of the Sustainability Department, when needed. The Internal Working Group on Human Rights and Business develops 'new tools to vet and evaluate suppliers based on their labour and human rights standards'. [FOR Human Rights June 2020, 06/2020: eni.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates that in 2017 the Company's Business and Human Rights Working Group 'started its activities by hosting a workshop aimed at launching the identification of the Company's salient human rights issues, with the support of the Danish Institute for Human Rights. The Workshop took place at Eni's Headquarters'. The Company explains the operations of the workshop, including participants, how discussion end experiences were managed, leading to 'the identification of a list made of 13 salient issues, split in 4 main areas, deemed to be the topics where lies the most severe, potential, negative human rights risks'. In 2018 the list of issues was shared with external stakeholders and experts in the filed of human rights to gather feedback. 'These meetings were held with the Institute for Human Rights and Business, IndustriaALL, the Italian Interministerial Committee on Human Rights (CIDU), AVSI, and Unicef Italia'. The Company discloses the inputs that came out. [FOR Human Rights June 2020, 06/2020: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: identifying risks in EX business partners: See above. Human rights issues identified under the Human rights in Eni's relations with suppliers and other business partners cluster include: Modern slavery, Migrant workers, Freedom of association and collective bargaining, Working conditions, and Safe and healthy working conditions. [FOR Human Rights June 2020, 06/2020: eni.com] Score 2 • Met: Ongoing global risk identification: The Company discloses that it undergoes due diligence at the corporate level, due diligence of industrial projects, due diligence of specific functions, and due diligence on counterparties and business partners. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: In consultation with stakeholders: According to its Human Rights report, in 2018, the Company shared the list of Salient Human Rights Issues 'with external stakeholders and prominent experts in the field of business and human rights, in order to gather their feedbacks and suggestions. These meetings were held with the Institute for Human Rights and Business, IndustriAll, the Italian Inter Ministerial Committee on Human Rights (CIDU), AVSI and Unicef Italia and allowed Eni to receive several inputs to strengthen our approach and to get important information on the upcoming issues on Business Human Rights'. IndustriALL represents workers as affected stakeholders. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: In consultation with HR experts: See above. Danish Institute for Human Rights involvement. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Triggered by new circumstances: The due diligence process is triggered by new business partnerships: 'The due diligence on counterparties and business partners is conducted before the conclusion of a JV agreement or in case of merge & acquisition operations'. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Explains use of HRIAs or ESIA (inc HR): 'According to the characteristics of the project, different assessments are conducted to identify and evaluate potential impacts on human rights: ad hoc Human Rights Impact Assessment (HRIA) and specific analysis on human rights integrated into the Environmental, Social and Health Impact Assessment (ESHIA) that usually are carried out for every industrial project. The HRIA is carried out to evaluate in depth project more at risk (see the paragraph "Stand-alone human rights impact assessment" for further information); in both cases, when a HRIA or an ESHIA is carried out, an Action Plan is defined based on the findings'. [FOR Human Rights June 2020, 06/2020: eni.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company has different methods to assess human rights impacts. They share two main characteristics: 'they are cross-functional, meaning that since they take the full spectrum of human rights into consideration, they require participation and commitment from all Eni's departments; they address potential and actual impacts from Business Partners' activities, other than direct impacts caused by Eni.' Two stand-alone assessments are described: Human Rights Compliance Assessments and Human Rights Impact Assessments. 'The HRCA is the preferred option for mature projects carried out by subsidiaries that are well established and staffed in the Countries, while a HRIA is a more useful approach for the preliminary phases (i.e.: seismic activities, start of land management operations, etc.); The HRIAs are based on opinions, perceptions and concerns emerging from interviews and focus group discussions with Project-affected Peoples and other relevant stakeholders such as NGOs, National Human Rights Institutions and international organizations, while HRCAs are more focused on internal company policies and practices.' These, 'well as the Workshop[,] led to the identification of Eni's salient Human Rights issues.' [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Public disclosure of salient risks: The Company's salient issues include equal treatment, health and safety, freedom of association and collective bargaining, migrant workers, land rights, excessive use of force, etc. [FOR Human Rights June 2020, 06/2020: eni.com] Score 2 • Met: Both requirements under score 1 met: See above

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: For each area identified to be a human rights issue, the Company describes actions carried out. These include the topics of Human rights in the workplace, Human rights in Eni's relations with suppliers and other business partners, Human rights in host community relations, and Human rights and security. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Including amongst EX BPs: Following the assessment, the area of salient issues related to 'suppliers and other business partners' include the issues of modern slavery, migrant workers, freedom of association and collective bargaining, working conditions, and safety & healthy working conditions. For these, the Company describes the different policies to deal with risks (statement on human rights, supplier code, global framework agreement requiring qualification processes and contract clauses for partners), measures to monitoring suppliers' risks and assessments. The Company details each of the measures. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Example of Actions decided: The Company describes examples of impact assessment for exploration activities in Myanmar. It describes the potential criticalities and management measures adopted, including the 'definition and implementation of a procedure to manage the relationship with the local communities involved in the project, from the preliminary identification of the people until payment of compensation', 'signature of binding agreements with the seismic contractor and relative to local subcontractors, aimed at guaranteeing alignment of general working conditions to the provisions of the Burmese labour law, to Eni standards and to the main international standards'. [FOR Human Rights June 2020, 06/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System to check if Actions are effective: The Company describes the following relating to monitoring the effectiveness of the due diligence process: 'Once a year, the Sustainability department collects all the Action Plans – as well as spare actions undertaken on specific topics – emerging from the due diligence process to feed the update of the Corporate Action Plan on human rights and as an input for the gap analysis described to evaluate the effectiveness of the entire system. The actions of the Plan are declined into the Management Objectives assigned to the top management of Eni. The process to monitor the effectiveness of the actions involves: 1) the use of several internal and public KPIs that are disclosed into this report; 2) the engagement of stakeholders to share Eni's approach and listen to their expectations.' [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Lessons learnt from checking effectiveness: Main challenges identified in exploration activities in Myanmar (case of example), included people's perceptions of oil and was projects due to negative past experiences, and difficulty in obtaining consent from all community members to access their land for the seismic survey'. Lessons learned as consequence of this with an adviser included the following: '1)providing communities and Civil Society Organizations with proper information beforehand, engaging and consulting with them before and during the assessment and establishing a well-functioning grievance mechanism, proved successful methods to help taking away this worry; 2) Properly explaining the process, including technical aspects and what potential damage could look like is necessary for landowners and users to understand what the impacts could be. One of the positive aspects of this exercise was the successful implementation of the checklist that DIHR developed By doing this, Eni was able to integrate checklists into its internal policies, procedures and practices, including when identifying a contractor, before the project started and thereby minimizing negative impacts'. [FOR Human Rights June 2020, 06/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See B.2.1 • Met: Comms plan re assessing risks: See B.2.2 • Met: Comms plan re action plans for risks: See B.2.3 • Met: Comms plan re reviewing action plans: See B.2.4 • Met: Including EX business partners: The Company has achieved full score in all B.2.1 to B.2.4

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Responding to affected stakeholders concerns: The Company 'provides public responses as well as direct answers to concerns and issues raised by rightsholders, NGOs or communities' representatives in order to ensure accessibility and public commitment towards actions undertaken or solutions proposed. Eni's public responses are also collected by third parties' website, such as the Business & Human Rights Resource Centre, as a way to ensure accountability for the commitment taken'. The Human rights report provides examples, including the following: In 2017, 'an association called Egbema Voice of Freedom (EVF), in the Aggah community, issues a complaint before the Italian National Contact Point (NCP) [...] The application complained that Eni was not doing enough to mitigate the impact of its operations on the effects of the floods on the community'. The Company discloses the results of the procedure, including next steps. 'Eni actively participated in all the phases of the procedure with included a joint visit to the site in Nigeria. Finally, Eni shared and accepted the terms of the agreement proposed by the Conciliator at the end of the procedure, namely the commitment to verify the need for additional drainage systems, in addition to the existing ones, under the road that connects the wells locations and to proceed with their construction, which is aligned with the usual community relationships activities'. [FOR Human Rights June 2020, 06/2020: eni.com] Met: Ensuring affected stakeholders can access communications: The Company's 'Community Liaison Officers are Eni's representatives in charge for building positive and trust based relations with communities and stakeholders through direct and continuous listening. Their role ensures a continuous engagement and communication with local communities' members and representative: their presence on the territory is crucial to encourage positive communication and provide accessible information to potential affected stakeholders on how Eni manages specific issues and handles the concerns they raised'. Following the case described above, 'Following the signing of the Terms of Settlement, NAOC and Egbema voice of Freedom (EVF) designated their respective contact persons who met several times in order to define the contents of the drainage interventions to be carried out in the community'. [FOR Human Rights June 2020, 06/2020: eni.com]

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: In its Human Rights Report, the Company indicates: 'Eni uses a Whistleblowing reporting management system that enables anyone - whether Eni's people, stakeholders or other third parties - to send reports on issues pertaining to the internal control and risk management system or other violations of the Code of Ethics, including possible violations of human rights'. [FOR Human Rights June 2020, 06/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Number grievances filed, addressed or resolved: The Human Rights report states that 'In 2019, investigations were completed on 74 files, 20 of which included human rights aspects, mainly concerning potential impacts on workers' rights. Among these, 26 reports were checked: the events reported were confirmed, at least in part, for only 7 of these, and actions were taken to mitigate and/or minimize the impacts'. [FOR Human Rights June 2020, 06/2020: eni.com] Met: Channel is available in all appropriate languages: As part of the process for managing complaints, the Company states 'After having received a concern or grievance, (which may also be in local language and/or lodged anonymously), the function responsible for receiving grievances registers it'. [FOR Human Rights June 2020, 06/2020: eni.com] Met: Opens own system to EX BPs workers: The Company discloses the following: 'Eni's grievance mechanisms may be used by workers within the company as well as suppliers' workers and contractors, and by local communities' members and organizations'. [FOR Human Rights June 2020, 06/2020: eni.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism for community: The Company 'uses a Whistleblowing reporting management system that enables anyone - whether Eni's people, stakeholders or other third parties - to send reports on issues pertaining to the internal control and risk management system or other violations of the Code of Ethics, including possible violations of human rights.' [FOR Human Rights June 2020, 06/2020: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company describes accessibility: 'multiple access points should be established, and parties should be given adequate notice of the mechanism's establishment. Some examples of possible access points are: directly to the function responsible for receiving grievances (e.g. through a specially dedicated office of the company, such as the Community Liaison Officers - see p. 95 on the role of Eni's CLO), by writing to a dedicated e-mail address, by letter, through the company website, through a dedicated telephone number, through trusted third parties (NGOs, local associations, etc.).' As part of the process for managing complaints, the Company states 'After having received a concern or grievance, (which may also be in local language and/or lodged anonymously), the function responsible for receiving grievances registers it'. [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Expects EX BPs to have community grievance systems: The Company 'expects that also its Suppliers provide their employees and the communities with whom they interact on behalf of Eni with their own remedial mechanisms that can be used also anonymously.' [Supplier Code of Conduct, 03/2020: esupplier.eni.com]
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company reports the case of people within a village in Kazakhstan, located on the border of the sanitary protection zone of activity of the Company (Karachaganak Petroleum Operating B.V., KPO). 'Some NGO and media attributed the symptoms suffered from the population to emissions from the KPO facility. Because the villages affected fell within the boundaries of potential expansion developments, 'the villagers were resettled to the town of Aksai and the suburban microregion of Araltal, which are locations with more favourable housing conditions in terms of the sanitary and hygienic standards. In Araltal the resettlers were moved into 100 detached houses and in Aksai they received flats in several apartment blocks [...] in total, 465 households were resettled in 2015-2017. [FOR Human Rights June 2020, 06/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition: The Company provided an example of working with suppliers in order to improve practices. No evidence found of changes introduced to stop repetition of negative human rights impacts. [FOR Human Rights June 2020, 06/2020: eni.com] • Not met: Approach to learning from incident to prevent future impacts • Met: Evaluation of the channel/mechanism: The Company states that 'a community grievance mechanism assessment involving 20 Eni subsidiaries was carried out in 2017 in order to assess the implementation process, improve the management of the grievance mechanism and enhance the quality of the procedure. The assessment underlined the importance of: simplifying the grievance mechanism recording forms; promoting integrated management of grievances in locations with multiple Eni organizations; further reinforcing Eni's role in non-operated assets and further clarifying the role of contractors and NGOs in the management of grievances'. [ENI for Human Rights 2020, Jun 2020: eni.com]

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Niger Delta oil spills • Area: Environmental damage • Story: ENI is a partner in the Joint Venture Shell Petroleum Development Company of Nigeria Limited (SPDC). Its subsidiary Agip also holds a 5% stake. SPDC has been criticised for frequent oil spills in the Niger Delta, which have caused serious damage to the environment, human health and livelihoods. In November 2013, Amnesty International (AI) and the Centre for Environment, Human Rights and Development (CEHRD) published a report entitled 'Nigeria: Bad information: Oil spill investigations in the Niger Delta' that alleged specific cases in which the SPDC joint venture had falsely reported the cause of oil spills, the volume of oil spilt, or the extent and adequacy of clean up measures or compensation. <p>In June 2014, a ruling by the London Technological and Construction Court ruled that where there are inadequate systems in place, the Company would be responsible for the resulting pollution caused by criminals. In January 2015, it was reported in the press that the Company had agreed to pay approximately USD 80m (GBP 55m) to compensate a Nigerian community for the two spills in 2008 and 2009. GBP 35m was to be split between individual villagers and GBP 20m would go to the Bodo community to build health clinics and refurbish schools. In 2017, Shell tried to strike out the lawsuit alleging that some members of the community had obstructed the clean up. The Court dismissed the claim. Later that year the company sought to prevent the community from going back to court by requesting to include a clause in the settlement, according to which any disruptive act by any resident of the Bodo community would lead to termination of the lawsuit. However, on 24 May 2018, a UK judge ruled that the Bodo community should retain the right to revive the claim for another year with no conditions attached, in the event of the clean-up not be completed to an adequate standard. [VE Controversies Report, 27 June 2018]</p> <p>During 2018, allegations related to these operations remain ongoing: On March 16, 2018, Amnesty International has exposed evidence that Shell and Eni are taking weeks to respond to reports of spills and publishing misleading information about the cause and severity of spills, which may result in communities not receiving compensation. Similarly, on August 4, 2018, the Nigerian Times reported that members of Bakiri community, in the area of Bayelsa State, conducted a demonstration against the alleged neglect by Shell Petroleum Development Company (SPDC), accusing the company of neither sending relief materials nor a medical team to care for the health challenges posed by an incident that took place in May 2018. It is reported that the oil spill occurred along the 24 inch Trans-Ramos pipeline of SPDC and had affected communities in Bayelsa and Delta states and that over 50 fishing settlements had been destroyed by the spill.</p> <ul style="list-style-type: none"> • Sources: [Amnesty International, 07/11/2013 -: amnesty.org][The Guardian, 07/01/2015 -: theguardian.com][The Independent, 16/03/2018: independent.co.uk][Amnesty International, -: amnesty.org]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: In its annual report of 2020, ENI acknowledges some of the reports which raised allegations against SPDC and that it has conducted its own assessment of the allegations. [Human Rights Report, 2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: Though ENI did disclose that it reviewed some of the allegations, there is no detail on this review. [Human Rights Report, 2020: eni.com]
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company states that it promotes respect for the environment [Sustainability Policy, 27/04/2011: eni.com] • Met: Policies apply to the type of business relationships involved: Its policies on the environment also apply to suppliers and partners. [FOR Human Rights June 2020, 06/2020: eni.com & Supplier Code of Conduct, 03/2020: esupplier.eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: ENI has a public environmental policy covering oil spill clean ups and prevention measures. [Eni for 2018 - Performance, 2019: eni.com]

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E(1).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find evidence of engagement other than through the court case • Met: Encourages linked business to engage affected stakeholders: In its human rights report, the company explains how it uses its leverage to influence SPDC - 'NAOC representatives exerts leverage on the JV to share Eni's standards and ask for any clarification on SPDC operations in order to prevent and mitigate any potential adverse impacts. In addition to the participation in several committees, NAOC may request ad hoc engagements to call the attention of the Operator on specific issues and share its own position, as well as use the Managing Directors' meetings to discuss relevant issues. Finally, in the event where Eni representatives are not in agreement with the Operator, strategic relationships with the partners in the JV are used in order to ensure that, despite the marginal share of 5%, Eni could gain the necessary support to further influence the decision making.' [FOR Human Rights June 2020, 06/2020: eni.com] • Met: Provides remedies to affected stakeholders: SPDC agreed to pay for the clean up following a court case. However, at a later stage, they attempted to renege and to deny the right of the community to pursue legal action if the clean up was inadequate. In addition, SPDC has indicated: 'SPDC is pleased that after significant engagement in 2016 and 2017 with the communities and other stakeholders managed by the BMI, the clean-up and remediation activities commenced in September 2017. (...) Should activities continue uninterrupted it is expected to take approximately three years. Phase 1 of the clean-up is expected to be completed in early 2018 as per plan. However, for clean-up and remediation to be successful, the repeated re-contamination of cleaned-up sites due to crude oil theft and illegal refining must end. A coordinated approach among all stakeholders, particularly federal and state government agencies is essential to address the ongoing problem of re-pollution'. [SPDC's response to Niger Delta case, n/a: reports.shell.com] • Not met: Has reviewed management systems to prevent recurrence: SPDC has publicly indicate that it is committed to reducing oil spills and to cleaning spills up as quickly as possible. However, CHRB has not been able to find public details on corrective actions such as company-wide compliance mechanisms or public disclosure of progress with clear goals. [SPDC's response to Niger Delta case, n/a: reports.shell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Residents of Aggah Community in Nigeria file complaint against ENI for causing floods • Area: Environmental damage • Story: On December 15, 2017, Egbema Voice of Freedom (EVF), an association of residents of Aggah in Rivers State, Nigeria, filed an OECD complaint to the Italian and Dutch authorities regarding ENI, which allegedly causes flooding. The Aggah Community lives near the Mgbede oil field, which is operated by Nigerian Agip Oil Company Ltd, an indirect wholly-owned subsidiary of ENI S.p.A and its Dutch subsidiary, ENI International BV. <p>The Company has built elevated roadways and embankments that allegedly completely block natural streams that used to flow through Aggah, causing the streams to back up and violently flood large swathes of farmland and residential areas. According to a recent survey of over two thousand residents carried out in Aggah, the floods' impacts on health, livelihoods and property are widespread and severe. Based on an impact assessment report, carried out by the complainant, they have found that nearly all households in Aggah have lost agricultural products, while more than 65% of households have suffered physical injuries as a result to the flooding.</p> <p>The Italian NCP accepted the complaint on 26 July 2018 and opened a mediation procedure between the parties in the presence of a third-party Conciliator. This process led to an agreement between the parties which was accepted on 8 July 2019. This agreement was made public on 2 October 2019. The terms of the settlement provide for the urgent construction of new culverts/drainage channels and maintenance and management of the existing channels to avoid flooding. It also calls for the impact of those measures to be verified in the presence of a technical expert, to determine whether further action should be taken. NAOC's surveyors have already entered the community to determine the commencement of any new construction.</p>

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			<p>Since the announcement of the agreement, Eni has conducted engineering surveys to design a new drainage system through Aggah, but work is suspended due to the COVID-19 crisis.</p> <ul style="list-style-type: none"> Sources: [Egbema Voice of Freedom Press Release - 15/12/2017 : complaints.oecdwatch.org][OECD Watch - 15/12/2017: complaints.oecdwatch.org][Lifegate - 24/04/2018: lifegate.com][BHRRRC - 09/01/2018: business-humanrights.org]
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public response available: The company provides a public response on the BHRRRC website and in its 2020 Human Rights report. [FOR Human Rights June 2020, 06/2020: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Response goes into detail: In its response ENI provides context on the environmental factors present in the region such as seasonal rains, along with an explanation of how drainage systems and how compensation is provided where material damage is identified. The company also states that "With specific reference to the request presented at the Italian National Contact Point by the Egbema Voice of Freedom, represented by Chima Williams & Associates (CWA) and Advocates for Community Alternatives, Eni is providing all the relevant information to the National Contact Point, in line with its commitment to comply with the OECD Guidelines for Multinational Companies." The company also refers to the agreement it reached following the NCP mediation. [FOR Human Rights June 2020, 06/2020: eni.com]
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised: In its Sustainability Report 2017, the Company says: "Protection of the environment, based on the principles of prevention, protection, information and participation, is an essential component of how ENI operates. To ensure a uniform approach that adheres to the best technologies and international practices, Eni adopts an integrated health, safety and environment Management System, certified under ISO 14001, in all its plants and production units." [Sustainability Report 2017, December 2017: eni.com] Met: Policies apply to the type of business relationships involved: Nigerian Agip Oil Company Ltd joint venture is an indirect wholly-owned subsidiary of ENI S.p.A and its Dutch subsidiary, ENI International BV. Therefore ENI's policies apply to the business relationship involved [Sustainability Report 2017, December 2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Policies address the specific rights in question: The Company states that "ENI identifies and assesses all potential impacts of its operations on biodiversity and implements mitigation actions, including offsets in order to minimise any adverse effects. ENI evaluates the interaction of its activities with ecosystem services, and promotes, in particular, efficient water management, especially in areas under water stress, and the reduction of emissions in air, water and soil." [Sustainability Report 2017, December 2017: eni.com]
E(2).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Engages with affected stakeholders: The company explains its engagement with stakeholders, saying, "NAOC is in constant dialogue with local authorities and communities to intervene in a timely manner in the event of blockages, the obstruction of drains, or other damage to infrastructure...Where economic damage is identified, all those affected will receive appropriate compensation, the amount of which is determined on the basis of defined standards that take account of the impact on the proprietor or community resulting from the non-use of the area in question". [ENI Response to Aggah community Facing Finance report, 16/07/2018: business-humanrights.org] Met: Encourages linked business to engage affected stakeholders: The company says "Where economic damage is identified, all those affected will receive appropriate compensation, the amount of which is determined on the basis of defined standards that take account of the impact on the proprietor or community resulting from the non-use of the area in question. All the companies operating in the sector share these standards, and compensation levels are regularly reviewed." [ENI Response to Aggah community Facing Finance report, 16/07/2018: business-humanrights.org] Met: Provides remedies to affected stakeholders: The company explains how remedy is provided, "Where economic damage is identified, all those affected will

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			<p>receive appropriate compensation, the amount of which is determined on the basis of defined standards that take account of the impact on the proprietor or community resulting from the non-use of the area in question." [ENI Response to Aggah community Facing Finance report, 16/07/2018: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence: The CHRB could not find any publicly available evidence that Eni has reviewed its management system. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: The Italian NCP opened a mediation procedure between the parties in the presence of a third-party Conciliator. This process led to an agreement between the parties which was accepted on 8 July 2019. [ENI Response to Aggah community Facing Finance report, 16/07/2018: business-humanrights.org] • Not met: Has improved systems and engaged affected stakeholders: The CHRB could not find any publicly available evidence that Eni has improved its systems but it did engage with the affected stakeholders. [ENI Response to Aggah community Facing Finance report, 16/07/2018: business-humanrights.org]
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: One worker died and others injured in the Caspian Sea after a fire on board a pipe lay vessel • Area: Health & safety - serious incident • Story: On May 8, 2019, the press reported that an explosion on a pipe-laying vessel in the Caspian Sea injured 14 workers, seven of whom were sent to intensive care due to the burns they suffered. Seven of those injured in the explosion were treated in intensive care for burns. The explosion was related to maintenance operations on an item of equipment during pipe-laying activities done by Saipem (a subsidiary of ENI). On May 13, 2019, the press reported that one of the 14 workers injured in the explosion has died. • Sources: [Reuters - 13/05/2019: reuters.com][Pipeline & Gas Journal - 10/05/2019: pgjonline.com][Reuters - 09/05/2019: reuters.com][[]]
E(3).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: Saipem has provided a detailed public response. However, ENI who owns 30% of shares in the company didn't respond and therefore the company is not awarded the point [Saipem: accident on a vessel operating in the Caspian Sea, 09/05/2019: saipem.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail [Saipem: accident on a vessel operating in the Caspian Sea, 09/05/2019: saipem.com]
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Saipem's sustainability policy states that "The promotion and respect of Human and Labour Rights together with the protection of health, safety and personal security are non-negotiable values that suppliers, clients and subcontractors must endorse to partner with our Company. The UN Guiding Principles on Business and Human Rights, the UN Global Compact, the Agenda 2030 and the Sustainable Development Goals guide our sustainable business strategy." [2018 Sustainability Report, 2019: 2018sustainablesaipem.saipem.com & Policy Sustainable Saipem, 16/05/2019: saipem-cdn.thron.com] • Met: Policies apply to the type of business relationships involved: Saipem's sustainability policy states that "The promotion and respect of Human and Labour Rights together with the protection of health, safety and personal security are non-negotiable values that suppliers, clients and subcontractors must endorse to partner with our Company. The UN Guiding Principles on Business and Human Rights, the UN Global Compact, the Agenda 2030 and the Sustainable Development Goals guide our sustainable business strategy." [Policy Sustainable Saipem, 16/05/2019: saipem-cdn.thron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company discloses information on health and safety through its "Total Recordable Incident Frequency Rate (TRIFR)" table. [2018 Sustainability Report, 2019: 2018sustainablesaipem.saipem.com]
E(3).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders: There is no evidence that Saipem has encouraged linked businesses to engage.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders: Saipem did, however, state that the fourteen people involved in the accident were transferred to the hospital and made a commitment that it will continue to ensure the immediate repatriation of those who have suffered the least serious injuries and the transfer of the other injured people to specialized medical centers. More information is needed to determine whether the company offered compensation or ongoing support. [Saipem: accident on a vessel operating in the Caspian Sea, 09/05/2019: saipem.com] • Met: Has reviewed management systems to prevent recurrence: Regarding the risks related to the safety and health of people, Saipem has introduced a series specific mitigation initiatives: the continuing and renewed implementation of the 'Leadership in Health & Safety' (LiHS) programme, which aims to strengthen the corporate culture in the field of health and safety; various campaigns, for example 'Life Saving Rules', aimed at promoting awareness of dangerous activities and actions that each individual can have in place to protect themselves and others; the development of advanced occupational health and health surveillance activities. [2018 Sustainability Report, 2019: 2018sustainablesaipem.saipem.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has improved systems and engaged affected stakeholders

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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