

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name ENI
Industry Extractives
Overall Score (*) 61.8 out of 100

Theme Score	Out of	For Theme
7.7	10	A. Governance and Policies
15.0	25	B. Embedding Respect and Human Rights Due Diligence
7.9	15	C. Remedies and Grievance Mechanisms
16.3	20	D. Performance: Company Human Rights Practices
8.1	20	E. Performance: Responses to Serious Allegations
6.9	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company's Global Agreement on International Industrial Relations and Corporate Social Responsibility states 'Eni is committed everywhere, within its own sphere of responsibility to supporting and complying with the principles of the universal declaration of human rights of the United Nations, the fundamental conventions of the ILO, the OECD Guidelines for Multinational Enterprises, the principles of the United Nations Global Compact, and the UN Guiding Principles for Business & Human Rights' [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: UNGC principles 1 & 2: See above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: UDHR: See above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] Score 2 • Met: UNGPs: See above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: OECD: See above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com]
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: In the Company's Global Agreement on International Industrial Relations and Corporate Social Responsibility it explicitly commits to all ILO core

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conventions and health and safety protection for its employees and communities. Eni requires its suppliers 'to declare its own acceptance of the principles and international standards of human rights, including the Universal Declaration of Human Rights, the Global Compact and the Eni Code of Ethics, as well as the specific safety requirements that Eni adopts... Eni requests its suppliers to ensure that, when activities are performed through subcontractors, these last meet the same requirements.' [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com]</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: All four ILO apply to EX BPs: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: Respect H&S of workers: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: H&S applies to Ex BPs: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments: ENI commits to operate in accordance with the United Nations' Universal Declaration of Human Rights. Eni manages its security operations in accordance with international Human Rights principles, and in compliance with the guidelines set out by the Voluntary Principles on Security & Human Rights. [Human Rights in our internal legal framework, 20/03/2018: eni.com & Human Rights and Security, 26/06/2018: eni.com] • Met: ILO 169: ENI commitments to respect international Human Rights Treaties aimed at protecting specific Vulnerable Groups such as ILO Convention no. 169 on Indigenous and Tribal Peoples [Human Rights in our internal legal framework, 20/03/2018: eni.com] • Met: Expects BPs to respect these rights: "The Code of Ethics applies to all direct and indirect subsidiaries both in Italy and abroad and includes a commitment to take all possible measures to ensure the respect of the principles included in the Code of Ethics within Eni's relations with its Business Partners, including Joint Venture partners and suppliers." The term Business Partners means the partners of Joint Venture/Consortia where Eni operates, suppliers, contractors, agents or consultants working for Eni. [Human Rights in our internal legal framework, 20/03/2018: eni.com & Eni Guidelines on the Protection and Promotion of Human Rights, 17/04/2007: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: ENI has committed to consider the resettlement of people as the very last solution and engage in free, prior and informed consultation with the interested people with the objective of reaching an agreement. [Eni Guidelines on the Protection and Promotion of Human Rights, 17/04/2007: eni.com] • Met: IFC performance standards: "Eni applies principles and methods that comply with international standards, such as the IFC Performance Standard on involuntary resettlements. [Sustainability Report, 31/12/2017: eni.com] • Met: Respecting the right to water: "Eni respects the cultural, economic and social rights of the local communities in which it operates and undertakes to contribute, as far as possible, to their exercise, with particular reference to the right to adequate nutrition, drinking water, the highest achievable level of physical and mental health, decent dwellings, education, abstaining from actions that may hinder or prevent the exercise of such rights." [Code of Ethics, 23/11/2017: eni.com] • Met: Expects BPs to respect all these rights: "The Code of Ethics applies to all direct and indirect subsidiaries both in Italy and abroad and includes a commitment to take all possible measures to ensure the respect of the principles included in the Code of Ethics within Eni's relations with its Business Partners, including Joint Venture partners and suppliers." The term Business Partners means the partners of Joint Venture/Consortia where Eni operates, suppliers, contractors, agents or consultants working for Eni. [Human Rights in our internal legal framework, 20/03/2018: eni.com & Eni Guidelines on the Protection and Promotion of Human Rights, 17/04/2007: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: "Eni's activities are carried out in the awareness of the social responsibility that Eni has towards all of its Stakeholders and in particular the local communities in which it operates, in the belief that the capacity for dialogue and interaction with civil society constitutes an important asset for the company." [Code of Ethics, 23/11/2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: "ENI informs and engages local communities by promoting a free, prior and informed consultation, with the purpose of considering their requests concerning new business projects, impact assessments and community investments. The Company provides the following example in its 2017 Sustainability Report: "Start of consultation activities with the Authorities and the local communities for planning, management and realization of initiatives for the community in Congo (development and implementation of CATREP(b))" The Company has also committed to engage stakeholders in the development and monitoring of their human rights approach "In 2018 the Salient Issues identification process will enter the phase of External Stakeholder consultation with meetings with NGOs, academics and Business and Human Rights experts. The information gathered will be integrated with the already-identified Salient issues as a final stage of the process. Tracking and monitoring tools and processes shall be designed in order to report on progress." [Sustainability Policy, 27/04/2011: eni.com & The identification of Salient Human Rights Issues, 22/06/2018: eni.com]
A.1.5	Commitment to remedy	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: Commits to remedy: Access to Remedy - Eni actively engages in remediation in its subsidiaries. "Eni actively engages in remediation mainly through the implementation of operational level grievance mechanisms in its subsidiaries; enabling use of a reporting management system by both third parties and employees; cooperation in state based judicial and non judicial mechanisms." However, this is not sufficient to be considered a commitment to remedy. [Access to Remedy, 22/06/2018: eni.com & Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies: "Operational-level grievance mechanisms can serve as a primary form of remedy, especially when judicial or non-judicial state-based systems are weak or inaccessible. This makes sense especially considering that it is estimated that four billion people around the world currently live in conditions where they cannot adequately rely on the protection of the rule of law or have access to the institutions of justice." "Eni enables anyone – whether third parties or employees – to send information concerning issues related to the internal control and risk management system or other issues in violation of the Code of Ethics, including Human Rights issues." However, the Company does not make a commitment to not obstruct access to remedies [Access to Remedy, 22/06/2018: eni.com] • Met: Collaborating with other remedy initiatives: The Company has collaborated with various access initiatives. For example, the Company states "Following the OECD Guidelines for Multinational Enterprises, Eni also cooperates in other state-based judicial or non-judicial mechanisms (such as OECD National Contact Points, National Human Rights Institutions, or similar)." [Access to Remedy, 22/06/2018: eni.com] • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The Code of Ethics (that include ILO and HR statement) is approved by the Board of Directors. [Code of Ethics, 23/11/2017: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Board level responsibility for HRs: Board Sustainability and Scenarios Committee is responsible for human rights. [Sustainability Report, 31/12/2017: eni.com] Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: ENI's Chief Executive Officer Claudio Descalzi made a speech on human rights at a training workshop for the company's top management entitled "Raising awareness on Business and Human Rights in Eni Activities", held in October 2016. Claudio Descalzi has also been in the media highlighting its human rights work in Myanmar with Danish Institute of Human Rights as a model example. [Communicating commitment: our CEO speaks out on Human Rights, 22/06/2018: eni.com & Building sustainability into our business, 04/07/18: mingalarrealestateconversation.com]
A.2.2	Board discussions	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review of salient HRs: ENI's internal Working Group on Business and Human Rights hosted a Workshop to identify the company's Salient Human Rights issues. In 2018 the Salient Issues identification process will enter the phase of External Stakeholder consultation with meetings with NGOs, academics and Business and Human Rights experts. The information gathered will be integrated with the already-identified Salient issues as a final stage of the process. Tracking and monitoring tools and processes shall be designed in order to report on progress. Eni's Working Group on Human Rights and Business (HRBWG) is led by the Sustainability function which reports to the Board Sustainability and Scenarios Committee. The Board Sustainability and Scenarios Committee therefore is involved in the review of salient human rights risks. [The identification of Salient Human Rights Issues, 22/06/2018: eni.com & Human Rights Due diligence applied to our salient issues, 22/06/2018: eni.com] • Met: Examples or trends re HR discussion: In the process of identifying ENI's salient Human Rights issues, the preliminary outcomes following the Workshop were grouped into four main clusters: Human rights in the workplace, Human rights in contracting and procurement, Human rights in communities, and Human Rights and Security. A further key outcome of the Workshop was the identification of key enablers and barriers to addressing severe Human Rights impacts. [The identification of Salient Human Rights Issues, 22/06/2018: eni.com & Human Rights Due diligence applied to our salient issues, 22/06/2018: eni.com] Score 2 <ul style="list-style-type: none"> • Met: Both examples and process: As above [The identification of Salient Human Rights Issues, 22/06/2018: eni.com & Human Rights Due diligence applied to our salient issues, 22/06/2018: eni.com]
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Incentives for at least one board member: The Company specifies that the CEOs variable remuneration depends on environmental, sustainability and human capital indicators. Specifically the company applies a 12.5% weight on the total recordable incident rate safety indicator. [Remuneration Report, 15/03/2018: eni.com & Sustainability Report, 31/12/2017: eni.com] • Not met: At least one key EX RH risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Senior responsibility for HR (inc ILO): ENI Watch Structure serves as the Guarantor of the Code of Ethics, with the duty of promoting and verifying its implementation, including respect for Human Rights. [Integrating Human Right in our Organization, 22/06/2018: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: Eni Managers working in Departments which carry out activities that may impact Human Rights have objectives linked to the integration of the Human Rights perspective in their analysis and activities, together with operational and economic-financial targets. These objectives can be assigned to Managers with various degrees of responsibility (i.e.: Directors, Vice Presidents, Global Heads or Managing Directors of Eni subsidiaries, etc) [Integrating Human Right in our Organization, 22/06/2018: eni.com] Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	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"> Met: Senior manager incentives for human rights: "Eni Managers working in Departments which carry out activities that may impact Human Rights have objectives linked to the integration of the Human Rights perspective in their analysis and activities, together with operational and economic-financial targets." "Eni's variable remuneration schemes maintain a strong link with Eni's sustainability goals, including those relating to Human Rights, with a weighted percentage ranging between 10% and 25%." [Integrating Human Right in our Organization, 22/06/2018: eni.com] Not met: At least one key EX HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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: HR part of enterprise risk system: Eni's Management System Guidelines on Sustainability integrates the Business and Human Rights framework into the Company's general risk management framework. [Human Rights in our internal legal framework, 20/03/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Audit Ctte or independent risk assessment: The Board Sustainability and Scenarios Committee provides recommendations and advice to the Board of Directors on the processes, projects and activities aimed at ensuring the Company's commitment to human rights. The Board Control and Risk Committee evaluates the adequacy of the risk management system. Activities carried out by the Control and Risk Committee, which among other functions is also responsible for i) examining the main risks presented to the Eni SpA Board of Directors and issuing opinions on specific aspects concerning the identification of the main risks; ii) examining specific internal control and risk management issues, including topics managed by the Health, Safety, Environment & Quality Department, Security Unit and the Sustainability Department. [Rules of the Sustainability and Scenarios Committee, 09/05/2017: eni.com & Integrating Human Right in our Organization, 22/06/2018: eni.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Communicates its policy to all workers in own operations: "Eni's commitment to respecting Human Rights Treaties and Standards is publicly declared in the company policies such as the Code of Ethics, the Sustainability Policy and other internal guidelines. Eni's endorsement and support for internationally recognized Human Rights is confirmed in the Global Framework Agreement (GFA) on industrial relations at the international level and in its corporate social responsibility renewed in 2016, where explicit reference to the UNGPs is made." Eni's Code of Ethics has been translated into 21 languages (English, French, German, Russian, Vietnamese, Chinese, Dutch, Hungarian, Turkish, Slovenian, Spanish, Kazakh, Greek, Portuguese, Flemish, Slovak, Arabic, polish, Romanian, Indonesian and Czech). The code includes Eni's commitment to operate in accordance with the United Nations' Universal Declaration of Human Rights, the eight Fundamental Conventions of the ILO and the OECD Guidelines on Multinational Enterprises. [Our internal policies and rules on Human Rights, 22/06/2018: eni.com & Code of Ethics, 06/07/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Communication of policy commitments to stakeholder: "Eni undertakes to ensure respect of internationally recognized human rights as part of its activities and to promote its respect as part of activities contracted out to, or conducted with partners, in line with the requirements of the UN Guiding Principles for Businesses and Human Rights (UNGP) of 2011, also included in the review of the OECD's Guidelines for multinationals of the same year." In line with its commitment to respecting the rights of the people working in Eni the Company held the first annual meeting on Corporate Social Responsibility in 2017 in the context of the Global

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			<p>Framework Agreement signed with the trade unions. However, in order to receive this indicator the CHRB requires evidence of how it is communicated to stakeholders (it only indicates 'promote its respect as part of activities...'). Local communities must also be included. [Sustainability Report, 31/12/2017: eni.com]</p> <ul style="list-style-type: none"> • Not met: How policy commitments are made accessible to audience: The Company discloses that the policy is made accessible through Training, seminars, website. E.g. annual meeting with trade unions as part of the Global Framework Agreement; training workshop on security and human rights for the Nigerian security forces. [Sustainability Report, 31/12/2017: eni.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Steps to communicate policy commitments to BRs: Eni communicates its human rights policy commitments its business relationships via training and workshops. [Our Commitment to respect Human Rights, 22/06/2018: eni.com] • Met: Including to EX BPs: As well as communicating its human rights policies to its business relationships through training workshops and contracts, Eni actively participates in IPIECA's project on Human Rights in the supply chain, which is aimed at building awareness and improving industry performance relating to the rights of site-based contractors' workforces. [Human Rights in our relations with suppliers and other business partners, 22/06/2018: eni.com & Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company's Specific Policies to Deal with Suppliers Risks document states that "Contracts must include an obligation for the counterparties to respect human rights and to demand, in turn, that their suppliers respect the same obligation." [Specific Policies to Deal with Suppliers Risks, unknown: eni.com & Specific policies and processes to deal with risks from counterparties, 22/06/2018: eni.com] • Not met: Including on EX BPs
B.1.5	Training on Human Rights	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: Trains all workers on HR policy commitments • Met: Trains relevant managers including security personnel: The Company trains groups of employees on human rights based on several criteria including seniority, responsibility and the specific risks associated with their respective activities. The Company states 'The course is available in English, Italian and French and is organised into two modules. The first is Human Rights Fundamentals (includes links to ILO Core labour standards), and the second is to ENI's policy commitment and related practices on human rights.' [Training on Human Rights - a tailored approach, 22/06/2018: eni.com & Business & Human Rights Resource Centre website, 20/06/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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"> • Met: Monitoring implementation of HR policy commitments: Eni has developed and implemented different processes and methodologies to identify, assess and monitor the impacts of its activities on human rights, including Human Rights Impact Assessments, Human Rights Compliance Assessments and a company-wide assessment conducted in 2017. [Assessing and monitoring the Human Rights Impacts of our activities, 22/06/2018: eni.com] • Not met: Monitoring EX BP's: <p>In 2017, Eni assessed and monitored more than 5,000 suppliers on issues having potential implications relating to respect for Human Rights (Health, Safety, Environment protection, workers' rights, anti-corruption, etc.). However, it is not clear if this applies to BPs. [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes corrective action process: In 2017, Eni assessed and monitored more than 5,000 suppliers on issues having potential implications relating to respect for Human Rights (Health, Safety, Environment protection, workers' rights, anti-corruption, etc.). Potential criticalities and/or possible areas of improvement were detected in 24% of these suppliers, however none were so serious as to compromise, in 95% of cases, the possibility of using these suppliers. The remaining 5% of the suppliers presented critical issues which led to a suspension of relations with Eni. [Code of Ethics, 23/11/2017: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Example of corrective action: In 2017, 29 whistleblowing reports included human rights aspects, mainly concerning potential impacts on workers' rights. Events reported were confirmed, at least in part, for only 3 of these, and actions were taken to mitigate and/or minimize the impacts including: (i) actions on the Internal Control and Risk Management System, relating to the implementation and strengthening of the controls in place, updating of contractual standards and actions to raise awareness with reference to business partners; and (ii) actions against employees, including disciplinary measures, in accordance with Model 231 and the collective labour agreement and other national laws applicable. [Integrated Sustainability Report, 31/12/2017: eni.com] • Not met: Discloses % of supply chain monitored: In 2017, Eni assessed and monitored 5,055 suppliers on issues having potential implications relating to respect for Human Rights (Health, Safety, Environment protection, workers' rights, anti-corruption, etc.). It is not clear what % of the supply chain this represents. [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com]
B.1.7	Engaging business relationships	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: HR affects selection extractives business partners: Eni has a requirement to carry out due diligence on Business Partners, as well as to provide them with information on the Guidelines on the Protection and Promotion of Human Rights. Human Rights risks are taken into consideration during contract negotiation. [Specific policies and processes to deal with risks from counterparties, 22/06/2018: eni.com] • Not met: HR affects on-going business partner relationships: Any potential impact on Human Rights deriving from Business Partners must be assessed and managed, also by means of contractual clauses and compliance monitoring. [Specific policies and processes to deal with risks from counterparties, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with business partners to improve performance: "Eni is committed to respect internationally recognized Human Rights in its own operations and to promote the respect of the aforementioned rights with regard to activities assigned to or carried out with Business Partners and in its relationships with stakeholders." [Specific policies and processes to deal with risks from counterparties, 22/06/2018: eni.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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"> • Met: Stakeholder process or systems: Human Rights are embedded in Eni's policies and governance processes. The Company values continuous engagement and training on Human Rights for its people and business partners. Eni works with other organizations to improve its performance and promote the implementation of the Business and Human Rights agenda. Eni communicates with its stakeholders by involving them in all phases of their activities, promoting and sharing common principles and sharing information. In 2018 the Salient Issues identification process will enter the phase of External Stakeholder consultation with meetings with NGOs, academics and Business and Human Rights experts. [Respect for Human Rights, 25/06/2018: eni.com & The identification of Salient Human Rights Issues, 22/06/2018: eni.com] • Not met: Frequency and triggers for engagement: Eni is committed to identifying, preventing, mitigating and accounting for how it addresses any potential impact on Human Rights deriving from Business partners, including suppliers. The application of a risk-based model makes it possible to define a yearly assessment plan for suppliers identified as "critical" on the basis of factors such as country risk and sector risk (high-risk countries in terms of violation of human rights as well as critical sectors in terms of workers' rights abuses). However, this is not sufficient to receive this indicator. [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com & Human Rights in our relations with suppliers and other business partners, 22/06/2018: eni.com] • Not met: workers in SP engaged: Eni is actively participating in IPIECA's project on Human Rights in the supply chain, which is aimed at building awareness and improving industry performance relating to the rights of site-based contractors' workforces. However, it is not clear whether this means that the Company is working with their workers within their own supply chain, or whether this is just a broader initiative. [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] • Not met: communities in the SC engaged

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			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: The Company reports the review of its Code of Ethics greatly benefited from consultation processes involving both internal and external stakeholders including NGOs focused on environmental and Human Rights issues, ESG Investors and Consumers Associations. However, this is not sufficient to be awarded this indicator. [Human Rights in our internal legal framework, 20/03/2018: eni.com]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: In 2017, the Eni Human Rights and Business Working Group hosted a workshop aimed at launching the identification of the company's salient Human Rights issues. These Human Rights issues were grouped into four main clusters: Human rights in the workplace, Human rights in contracting and procurement, Human rights in communities, Human Rights and Security. [The identification of Salient Human Rights Issues, 22/06/2018: eni.com] • Met: identifying risks in EX business partners: Human rights issues identified under the Human rights in contracting and procurement cluster include: Modern day slavery, Migrant workers, Freedom of association and Collective bargaining, Working conditions (wages and working hours), and Safe and healthy working conditions. [The identification of Salient Human Rights Issues, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: Eni carried out 16 Human Rights Assessments and 7 follow-ups in 2017, bringing the total since 2008 to 172 assessments in 14 countries of operation (China, Congo, Angola, Nigeria, Pakistan, East Timor, Ecuador, Mozambique, Indonesia, Algeria, Ghana, Vietnam, Kazakhstan and Italy). [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] • Met: In consultation with stakeholders: In 2017 Eni held the first annual meeting on Corporate Social Responsibility in the context of the Global Framework Agreement signed with the trade unions. [Sustainability Report, 31/12/2017: eni.com] • Met: In consultation with HR experts: Developed training modules on human rights in consultation with the Danish Institute for Human Rights. [Sustainability Report, 31/12/2017: eni.com] • Not met: Triggered by new circumstances: Human rights assessments include actions aimed at effectively involving suppliers, on site visits, verification of social policies, procedures and applied labour contracts, random checks on sensitive documents (attendance register, payslips, accident register, etc.), individual and group interviews on a representative sample of workers, sharing of findings and definition of an action plan for addressing the identified gaps. However, this is not sufficient information to be awarded this indicator. [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] • Met: Explains use of HRIAs or ESIA (inc HR): The application of the risk-based model makes it possible to define a yearly assessment plan for suppliers identified as "critical" on the basis of factors such as country risk and sector risk (high-risk countries in terms of violation of human rights as well as critical sectors in terms of workers' rights abuses). Eni carried out 16 Human Rights Assessments and 7 follow-ups in 2017, bringing the total since 2008 to 172 assessments in 14 countries of operation (China, Congo, Angola, Nigeria, Pakistan, East Timor, Ecuador, Mozambique, Indonesia, Algeria, Ghana, Vietnam, Kazakhstan and Italy). [Assessing and monitoring suppliers' risks, 22/06/2018: 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:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): In 2017, the Eni Human Rights and Business Working Group hosted a workshop aimed at launching the identification of the company's salient Human Rights issues. The Company discloses the salient human rights risks that were identified. These Human Rights issues were grouped into four main clusters: Human rights in the workplace, Human rights in contracting and procurement, Human rights in communities, Human Rights and Security. The Company then breaks this groups down and describes the relevant risks relating to each group of which the Company are going to tackle. [The identification of Salient Human Rights Issues, 22/06/2018: eni.com] • Met: Public disclosure of salient risks: Eni's salient Human Rights issues include: Discrimination and equal treatment based on religion, ethnicity and gender; Safe and healthy working conditions; Modern day slavery; Migrant workers; Freedom of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>association and Collective bargaining; Working conditions (wages and working hours); Safe and healthy working conditions; Land rights; Environmental impacts resulting in impacts on livelihood, health, water availability of communities and Indigenous Peoples; Project closure; Access to remedy; Excessive use of force by public and private security forces; and Employee security in high-risk environments. [The identification of Salient Human Rights Issues, 22/06/2018: eni.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met [The identification of Salient Human Rights Issues, 22/06/2018: eni.com]
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: The Company states following the identification of salient human rights risks that the Company will engage with external stakeholders to receive their feedback on the salient human rights risks. Then 'tracking and monitoring tools and processes shall be designed in order to report on progress.' For the identified 'salient issues' Human Rights in the Supply Chain and Respect for Human Rights in Communities, the Company has reported on in their sustainability report, and provided information on their actions to reduce these risks. [Sustainability Report, 31/12/2017: eni.com] • Met: Example of Actions decided: In the Sustainability report, the Company describes the actions taken for the four sustainability issues 'human rights in the workplace', 'human rights and security, 'human rights in the supply chain' and 'respect for human rights in communities'. For example, under the 'human rights in the workplace' breakdown, the company describes how in 2017 ENI held the first annual meeting on Corporate Social Responsibility in the context of the Global Framework Agreement signed with the trade unions. [Sustainability Report, 31/12/2017: eni.com] • Met: Including amongst EX BRs: The Company states 'Eni undertakes to ensure respect of internationally recognized human rights as part of its activities and to promote its respect as part of activities contracted out to, or conducted with partners. In addition the company discloses' Eni started an inter-functional working group on "Human Rights and Business" to better monitor and manage the risk of any violations and to promote a continuous improvement of its performance, in line with the main international standards and best practices regarding human rights and business.' Furthermore some of the examples provided of actions taken following the risk assessment involve business partners. [Sustainability Report, 31/12/2017: 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	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: System to check if Actions are effective: Eni follows up its human rights actions. The case study in the 2017 Sustainability Report shows the recommendations were adopted and implemented by the supplier within the agreed time. However, this is not sufficient information to be considered a 'system to check if actions are effective'. [Sustainability Report, 31/12/2017: eni.com] • Not met: Lessons learnt from checking effectiveness: Lessons learnt included "involving the parties concerned more effectively in the process, demonstrating adequate cultural sensitivity in conducting interviews with workers and presenting results as an opportunity for development and continuous improvement." However, this is not sufficient information to be awarded this indicator as it needs to refer to a particular human rights risk. [Sustainability Report, 31/12/2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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"> • Met: Comms plan re identifying risks: The Company communicates its plan re identifying risk on its website: "The identification of Salient Human Rights Issues" and in its Sustainability Report. The Company states that "The most relevant aspects related to human rights and business are strictly related to the sector and the operating context, and are defined as those with a higher potential risk and on which the greatest efforts should be concentrated, also in terms of communication with stakeholders." [Sustainability Report, 31/12/2017: eni.com & The identification of Salient Human Rights Issues, 22/06/2018: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Comms plan re assessing risks: The Company communicates its system to assess human rights risks and impacts and discloses its salient issues (See b.2.2) [The identification of Salient Human Rights Issues, 22/06/2018: eni.com] • Met: Comms plan re action plans for risks: The Company communicates its action plans on its website and in its Sustainability Report (see b.2.3). [Sustainability Report, 31/12/2017: eni.com & Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] • Not met: Comms plan re reviewing action plans [Sustainability Report, 31/12/2017: eni.com] • Not met: Including EX BRs: As above [Sustainability Report, 31/12/2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns [Sustainability Report, 31/12/2017: eni.com] • Not met: Ensuring affected stakeholders can access communications [Sustainability Report, 31/12/2017: eni.com]

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	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: Channel accessible to all workers: Eni has a procedure on Grievance Mechanisms which defines the set of activities to be carried out when Eni receives, in writing or verbally, concerns or grievances in relation to human rights issues. The procedure is an Annex to the Sustainability Management System Guideline accessible to all workers. [Access to Remedy, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: For grievance mechanism performance evaluations, its guidelines recommend that the local sustainability function assesses whether and how to make the evaluation results accessible to the local communities. To guarantee complainants' adequate access to the grievance mechanism, the policy states that multiple access points should be established to the same, and parties should be given adequate notice of the mechanism's establishment. Some examples of possible access points/routes are: directly to the function responsible for receiving grievances (e.g. through a specially dedicated office of the company), dedicated e-mail address, by letter, through the company website, through a dedicated telephone number, through trusted third parties (NGOs, local associations, etc.). <p>Furthermore, the Company's Operational-Level Grievance Mechanism, document states under the heading, "To properly process complaints" that grievance can be made in local language and logged anonymously. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com & Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com]</p> <ul style="list-style-type: none"> • Met: Expect EX BPs to have equivalent grievance system: "As for Eni's expectations of Business partners in relation to the establishment of their own grievance mechanisms, the Sustainability Management System Guideline indicates that "The performance of counterparties must also be verified on the basis of human right violation risk factors, ensuring support for counterparties in improving their performance and encouraging the collection of reports from their employees". [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Not met: Opens own system to EX BP workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: For grievance mechanism performance evaluations, its guidelines recommend that the local sustainability function assesses whether and how to make the evaluation results accessible to the local communities. To guarantee complainants' adequate access to the grievance mechanism, the policy states that multiple access points should be established to the same, and parties should be given adequate notice of the mechanism's establishment [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: Examples of possible access points/routes are: directly to the function responsible for receiving grievances (e.g. through a specially dedicated office of the company), dedicated e-mail address, by letter, through the company website, through a dedicated telephone number,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>through trusted third parties (NGOs, local associations, etc.). However, the Company needs to clarify whether complaints can be made in local languages. Furthermore, the Company's Operational-Level Grievance Mechanism, document states under the heading, "To properly process complaints" that grievance can be made in local language and logged anonymously. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com]</p> <ul style="list-style-type: none"> • Not met: Expects EX BP to have community grievance systems: "As for Eni's expectations of Business partners in relation to the establishment of their own grievance mechanisms, the Sustainability Management System Guideline indicates that "The performance of counterparties must also be verified on the basis of human right violation risk factors, ensuring support for counterparties in improving their performance and encouraging the collection of reports from their employees." However, it seems like this is a grievance mechanism expectation for business partners to set up that covers reports from employees, rather than community members [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Not met: EX BP communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system: A community grievance mechanism assessment involving 20 Eni subsidiaries was carried out in 2017 by an external consultant in order to assess the implementation process. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with users on system performance: The assessment underlined the importance, among other issues, 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. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Met: Provides user engagement example on performance: Case Study - During a one-week visit, Danish Institute for Human Rights spoke with all relevant stakeholders in Magway, in particular with community members whose land had been accessed, to hear first-hand how Eni had performed, including on access to grievance mechanisms. [Sustainability Report, 31/12/2017: eni.com] • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: When acknowledging that it has taken charge of the complaint, the function responsible for receiving grievances informs the complainant of the activities envisaged for handling the grievance and, where possible and appropriate, how long the complainants can reasonably expect until the conclusion of the grievance management process. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Met: How complainants will be informed: Once approved, the response is proposed to and discussed with the complainants. If accepted, the proposed resolution is signed by the complainants. At the end of the process, the function responsible for receiving grievances must always provide a response to the grievances/concerns received, even if the checks have revealed that they are not associated with Eni's activities. The local sustainability function monitors the results and may request feedback from complainants on their level of satisfaction. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: If the proposed resolution is refused, the function responsible for verification may propose referring the case to a review committee (composed of Eni and community representatives) or to an independent third party. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com]
C.5	Commitment to non-retaliation over complaints or concerns made	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 statement prohibiting retaliation: The Company's Management System Guideline states that "Retaliation is forbidden, Eni's personnel will not be dismissed, demoted, suspended, threatened, bullied or discriminated against in any way in the workplace because they legally lodged a Whistleblowing Report in good faith". [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Met: Practical measures to prevent retaliation: The confidentiality of the person who has expressed the concern and/or grievance must always be ensured.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Grievances may also be lodged anonymously. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BRs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms [Access to Remedy, 22/06/2018: eni.com] • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Met: Will work with state based or non judicial mechanisms: Following the OECD Guidelines for Multinational Enterprises, Eni also cooperates in other state-based judicial or non-judicial mechanisms (such as OECD National Contact Points, National Human Rights Institutions, or similar). Business enterprises' active engagement in remediation should take the form of both operational-level grievance mechanisms for individuals and communities and/or cooperation with judicial or state-based non-judicial mechanisms, as recognized by the UNGP n. 29 and by the OECD Guidelines for Multinational Enterprises (Chapter IV, Human Rights, comment 46). [Access to Remedy, 22/06/2018: eni.com] • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Living wage target timeframe: The Company pays its workers a living wage. The Company states 'Living wages are a key part of the Decent Work framework, therefore Eni is committed to ensuring that compensation and benefits reach adequate remuneration levels in line with market average practices for similar roles, which are significantly higher than the minimum subsistence wage. Eni annually monitors certain indicators concerning minimum wages for this purpose. The monitoring is carried out using as a reference the annual salary information from each country's market and segregated by role and level. The data is provided by renowned international consulting companies (HayGroup, WTW, Mercer). In particular, Eni compares the minimum levels of remuneration policy with the market practice of the 1st decile in each country(below this level there is still 10% of the salaries of the country, statistically measured by suppliers on a large number of companies). This comparison is carried out for over 80% of Eni's employees and is described in the annual sustainability report.' [Assessing respect for labour standards and monitoring salient issues, 26/06/2018: eni.com] • Met: Describes how living wage determined: Living wages are a key part of the Decent Work framework, therefore Eni is committed to ensuring that compensation and benefits reach adequate remuneration levels in line with market average practices for similar roles, which are significantly higher than the minimum subsistence wage. [Assessing respect for labour standards and monitoring salient issues, 26/06/2018: eni.com] Score 2 <ul style="list-style-type: none"> • Met: Pays living wages: As above [Assessing respect for labour standards and monitoring salient issues, 26/06/2018: eni.com] • Not met: Reviews living wages definition with unions

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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: Member of EITI: Eni is signed up to the Extractive Industries Transparency Initiative (EITI) [Payment transparency, 26/06/2018: eni.com] • Met: Reports of taxes beyond legal minimums: Disclosed on website and in Report on payments to governments. [Payment transparency, 26/06/2018: eni.com & Report on payments to governments 2017, 24/05/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country: Reports taxes by country, but not revenue. [Payment transparency, 26/06/2018: eni.com & Report on payments to governments 2017, 24/05/2018: eni.com] • Met: Steps taken re non EITI countries: Eni discloses payments to those countries, whose Governments/local authorities/ governmental counterparties granted their permission for publication. [Payment transparency, 26/06/2018: eni.com] • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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 not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Eni is committed to ILO Conventions 87, 98 and 135: right of association and negotiation and non-discrimination against workers' representatives. All workers are guaranteed the right to organise and effective recognition of their rights to collective bargaining, the right to join labour organisations of their own choosing without distinction, interference or prior authorisation, for protection of their own employment interests and to enjoy fundamental trade union rights, in accordance with local law, and with the core labour standards envisaged in the fundamental conventions of the ILO. Eni is committed to treat unions positively, and refrain from all anti-union activities and to remain strictly neutral concerning employee preference to join, remain with, transfer, or abandon their relationship with a union organisation. Workers' representatives must not suffer any discrimination in connection with their representation activity. Employee/union representatives shall have a reasonable access to the workplace. [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com] • Met: Discloses % covered by collective bargaining: The Company discloses that 36.49% of employees are covered by collective bargaining agreements. [Sustainability Performance 2017, 31/12/2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com & Sustainability Performance 2017, 31/12/2017: eni.com]
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	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: Injury Rate disclosures: In 2017 there was a further significant reduction in the total recordable injuries rate of the workforce (-6.8% compared to 2016) both for employees (-17.2%) and contractors (-2%) [Sustainability Performance 2017, 31/12/2017: eni.com] • Met: Lost days or near miss disclosures: The lost day rate for the workforce rose by 10.3% (+2.5% in Italy, +37.1% abroad). [Sustainability Performance 2017, 31/12/2017: eni.com] • Met: Fatalities disclosures: There was one fatal accident involving a contract worker in Egypt caused by an electric shock due to accidental contact with live part. [Sustainability Performance 2017, 31/12/2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company sets health and safety targets. According to the Company's 2016 and 2017 Sustainability Reports, ENI set a safety target of zero injuries for the 2018-2021 period. [Sustainability Report 2017, December 2017: eni.com & Sustainability Report 2016, December 2016: eni.com] • Met: Met targets or explains why not: The Company did not meet its injury target as it reported a Total recordable Injury rate of 0.33 in its 2017 Sustainability. The company had set a zero injury target for 2017-2020. However, the Company explains this was due to a fatal accident on an offshore platform in Egypt. [Sustainability Report 2017, December 2017: eni.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify indigenous rights holders: Eni carries out environmental, socioeconomic and cultural impacts assessments generated by its activities where it operates, including those related to indigenous people, guaranteeing their mitigation and designing suitable ameliorative initiatives, through the planning of actions for development. 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, including public consultations. As for the latter, Eni's procedures recognize the importance of involving vulnerable groups, adopting special tools and precautions such as: - Pre-consultation where possible, - Identification of appropriate representatives, - Identification of priority issues, - Attention to cultural appropriateness, - Sharing responsibilities with government for disclosure and consultation. [Specific Policies on host community relations, 26/06/2018: eni.com & Community engagement and other processes to ensure respect for host, 06/07/2018: eni.com] • Met: How engages with communities in assessment: As above [Sustainability Policy, 27/04/2011: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to FPIC (or ICMM): Eni informs and engages local communities by promoting a free, prior and informed consultation, with the purpose of considering their requests concerning new business projects, impact assessments and community investments. [Sustainability Policy, 27/04/2011: eni.com] • Not met: Gives recent example FPIC or dropping deal: Eni's policy commitment to promoting forms of free, prior, informed consultation to host communities becomes especially crucial when dealing with relations with indigenous communities. The Eni Norge Indigenous People Policy was signed in 2013. This Policy includes a commitment to "establish an effective and inclusive framework for the free and informed participation of Sami People in the consultation process, based on their social and cultural values and on the disclosure of all relevant information in the local language". However, this example is over three years old and therefore cannot be considered. [Community engagement and other processes to ensure respect for host, 06/07/2018: eni.com]
D.3.6	Land rights (in own extractive operations, which includes JVs)	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: Approach to identification of land tenure rights holders: Eni carries out environmental, socioeconomic and cultural impacts assessments generated by its activities where it operates, including those related to indigenous people, guaranteeing their mitigation and designing suitable ameliorative initiatives, through the planning of actions for development. 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, including public consultations. As for the latter, Eni's procedures recognize the importance of involving vulnerable groups, adopting special tools and precautions such as: - Pre-consultation where possible, - Identification of appropriate representatives, - Identification of priority issues, - Attention to cultural appropriateness, - Sharing responsibilities with government for disclosure and consultation. [Sustainability Policy, 27/04/2011: eni.com & Community engagement and other processes to ensure respect for host, 06/07/2018: eni.com] • Met: Describes approach to doing so if no recent deals: Eni is committed to avoid the resettlement of local communities; should this not be possible, it carries out preventive consultations with the affected people in order to reach joint agreements, by guaranteeing that the acquisition of territorial rights is properly compensated. In 2016 ENi conducted consultations with local communities concerning resettlement and livelihood restorations in Mozambique, Kazakhstan and Ghana [Sustainability Policy, 27/04/2011: eni.com & Specific Policies on host community relations, 26/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (in own extractive operations, which includes JVs)	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: How implements security (inc VPs or ICOC): Eni manages its security operations in accordance with international Human Rights principles, and in compliance with the guidelines set out by the Voluntary Principles on Security & Human Rights. Suppliers of security forces are selected, among other things, according to criteria related to human rights. The contractual terms include provisions on respect for human rights. Security operators and supervisors receive appropriate training on respect for human rights. The events considered most at risk are managed in compliance with international standards. [Strategies and actions to minimize risks deriving from Security forces, 26/06/2018: eni.com & Human Rights and Security, 26/06/2018: eni.com] • Met: Example of respecting HRs in security: Eni has organized a three-day seminar to support the spread of the human rights culture among the Nigerian public and private security forces and to train them about respecting human rights and avoiding excessive use of force. The courses were held by an external trainer and organized in accordance with the Voluntary Principles on Security and Human Rights (VPSHR). [Sustainability Report, 31/12/2017: eni.com] • Met: Ensures Business Partners follow security approach: A further driver in the selection of priority issues and actions is the leverage the company can exert on the different categories of Business Partners. Security contracts containing Human Rights clauses = 91%. [Strategies and actions to minimize risks deriving from Security forces, 26/06/2018: eni.com & Human rights in our Security operations - Assessing risks and monitoring performances, 25/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities: Critical sites covered by assessments /surveys, however, it is unclear whether this assessment involves communities. [Human rights in our Security operations - Assessing risks and monitoring performances, 25/06/2018: eni.com] • Not met: Working with local community: The processes in place to assess Human Rights risks in the management of Security Operations and monitor progress in the implementation of processes and tools to prevent and minimize impacts. [Human Rights and Security, 26/06/2018: eni.com]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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 to prevent water and sanitation risks: Eni has committed to "Respect cultural, economic and social rights and, where possible, contribute to their fulfilment - with particular reference to the rights to adequate food and drinking water, the highest attainable standard of physical and mental health, adequate housing, education - and refrain from actions which could obstruct or impede the fulfilment of these rights". "Access to water and basic sanitation is considered a priority for development and therefore promoting safe and reliable access to water is a priority for Eni, as part of its local intervention strategy. Initiatives promoting access to water resources and improve hygiene and sanitation conditions include the building of wells, water purifying plants, water distribution networks and sewers." [Eni Guidelines on the Protection and Promotion of Human Rights, 17/04/2007: eni.com & Sustainability Report, 31/12/2017: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Water targets considering local factors: Objectives for 2018-2021 include: Realize a project to increase access to water in North-East Nigeria; and approximately €48 million of investments expected. [Sustainability Report, 31/12/2017: eni.com] • Met: Reports progress in meeting targets and shows trends in progress made: In 2016 the Company signed collaboration agreements in Congo and Nigeria. In 2017 40,000 people benefitted from the maintenance of 23 wells in Congo, the realization of 6 new wells in Nigeria and one well with a desalination plant in Kenya serving approximately 1,500 people. [Sustainability Report, 31/12/2017: eni.com]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Right to livelihood • Headline: Niger Delta oil spills • Sources: Amnesty International, 07/11/2013 - amnesty.org The Guardian, 07/11/2013, 05/09/2013, 20/06/2014 and 07/01/2015 - theguardian.com and theguardian.com and theguardian.com Amnesty International, 01/06/2009, Friends of the Earth website, 15/01/2010, Shell Nigeria website, 04/08/2011, Wall Street Journal, 07/01/2015 • Allegation: 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>
E(1).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: Shell/SPDC responded publically in a hearing in the Hague. However, CHRB could not find evidence that ENI has made any public comments to the allegations related to SPDC. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised • Not met: Policies apply to the type of business relationships involved: CHRB could not find public statements relating to business relationships <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.
E(1).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: CHRB did not find evidence of engagement other than through the court case • Not met: Encourages linked business to engage affected stakeholders: CHRB did not find evidence that indicated the company encouraged SPDC to engage with stakeholders. • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>stakeholders, particularly federal and state government agencies is essential to address the ongoing problem of re-pollution'.</p> <ul style="list-style-type: none"> • Not met: Has improved systems and engaged affected stakeholders: 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. <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"> • Area: Health and safety • Headline: 13 contractors killed and 2 injured in Nigeria pipeline explosion • Sources: Eni's press release - 10/07/2015; Eni: first conclusions of the inspection on the fire in Nigeria - Eni's press release - 11/07/2015; Eni Oil-Pipeline Explosion in Nigeria Kills 12, Injures 3 - Bloomberg - 10/07/2015 eni.com Business and human rights - business-humanrights.org • Allegation: On July 9, 2015 an explosion occurred at the site of the repair works of Eni's Tebidaba-Clough Creek line, located in the Niger Delta. The explosion resulted in the death of 13 members of the maintenance team of a local company and injuries to two other people. The company reported in a press release that the pipeline was previously damaged by acts of sabotage.
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 <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: ENI stated, through its response to Business and Human Rights Resource center that, ' in relation to the Clough Creek-Tebidaba pipeline explosion (9 July 2015) which caused 14 fatalities, the Nigerian Department of Petroleum Resources (DPR) certified that the accident is attributed to an external act of vandalism with use of explosives. The DPR also testified that NAOC was compliant with safety procedures and did not operate negligently'.
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 • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: In the Company's Global Agreement on International Industrial Relations and Corporate Social Responsibility it explicitly commits to all ILO core conventions and health and safety protection for its employees and communities.
E(2).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 • Not met: Provides remedies to affected stakeholders • Met: Has reviewed management systems to prevent recurrence: The Company has indicated that, following the incident and investigation, 'NAOC has further engaged with Government Security Agencies, which have increased the number of military escort - prior to - and during the pipeline repair activity. NAOC has also immediately taken actions to curb any related reoccurrence of the fire incidents and to support the families of people involved (subcontractors and local authority representatives)'. It also reported that 'in Nigeria, Eni has also adopted a Process Safety Management System with the aim of preventing and mitigating the risks of significant accidents through the application of high management and technical standards during the gap analysis, planning, implementation, monitoring and follow up phases'. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.68 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, ENI made data public that met one or more elements of the methodology in 35 cases, leading to a disclosure score of 3.68 out of 4 points.

Indicator Code	Indicator name	Score	Explanation
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: Eni's 2017 Sustainability Report is prepared in accordance with the "Sustainability Reporting Standards" of the Global Reporting Initiative (GRI) with an "in accordance - core" level of compliance and also taking into consideration the "Oil & Gas industry guidance on voluntary sustainability reporting" produced IPIECA/API/OGP. [Sustainability Report, 31/12/2017: eni.com] • Not met: Company reports on SASB • Met: Company reports on UNGPRF: The scope and content of the human rights section on Eni's website have been developed to align with the UNGP Reporting Framework. [Respect for Human Rights, 25/06/2018: eni.com]
F.3	Key, High Quality Disclosures	1.2 out of 4	ENI met 3 of the 10 thresholds listed below and therefore gets 1.2 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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 2018 Key Findings report for more details of the research process.

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and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.