

Company Name ENI
Industry Extractives
Overall Score (*) 68.7 out of 100

| Theme Score | Out of | For Theme |
|-------------|--------|---|
| 8.6 | 10 | A. Governance and Policies |
| 17.7 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 8.8 | 15 | C. Remedies and Grievance Mechanisms |
| 16.9 | 20 | D. Performance: Company Human Rights Practices |
| 9.4 | 20 | E. Performance: Responses to Serious Allegations |
| 7.4 | 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 2019 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 | <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 says: '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, Dec 2018: eni.com] Met: UNGC principles 1 & 2: See above [Statement on respect to Human Rights, Dec 2018: eni.com] Met: UDHR: See above [Statement on respect to Human Rights, Dec 2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: See above [Statement on respect to Human Rights, Dec 2018: eni.com] Met: OECD: See above [Statement on respect to Human Rights, Dec 2018: eni.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| 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 everywhere, within its own sphere of responsibility, to supporting and complying with the principles of the Universal Declaration of Human Rights, the fundamental Conventions of the ILO [...]. In cases of potential divergence between local and international standards, Eni seeks solutions that permit practices based in international standards that still respect local principles.' [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com & Statement on respect to Human Rights, Dec 2018: eni.com] • Met: UNGC principles 3-6: As above [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com & Statement on respect to Human Rights, Dec 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, Dec 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: 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 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'. [Code of Ethics, 23/11/2017: eni.com & Statement on respect to Human Rights, Dec 2018: eni.com] • Met: Respect H&S of workers: The Code states that 'Eni's activities shall be carried out in compliance with applicable worker health and safety, environmental and public safety protection agreements, international standards and laws, regulations, administrative practices and national policies of the Countries where it operates'. [Code of Ethics, 23/11/2017: eni.com & Statement on respect to Human Rights, Dec 2018: 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'. [Global Framework Agreement on International Industrial Relations and CSR, 06/07/2016: eni.com & Statement on respect to Human Rights, Dec 2018: 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. In addition, in its Statement on respect for Human Rights, the Company indicates: 'Eni shall manage security activities in accordance with current regulations and international standards, including the United Nations Basic Principles for the Use of Force and Firearms by Law Enforcement Officials and the Voluntary Principles on Security and Human Rights, taking into account the specific needs of the countries where it operates.' [Human Rights in our internal legal framework, 20/03/2018: eni.com & Statement on respect to Human Rights, Dec 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 |

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|----------------|--|------------------|---|
| | | | <p>Indigenous and Tribal Peoples [Human Rights in our internal legal framework, 20/03/2018: eni.com]</p> <ul style="list-style-type: none"> • 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. In its Statement on respect for Human Rights, the Company indicates: 'Eni informs and engages local communities by promoting free, prior and informed consultations, with the purpose of considering their legitimate expectations in conceiving and conducting business activities, including community investments.' [Eni Guidelines on the Protection and Promotion of Human Rights, 17/04/2007: eni.com & Statement on respect to Human Rights, Dec 2018: eni.com] • Met: IFC performance standards: In its Sustainability Report 2017, the Company states: 'Eni applies principles and methods that comply with international standards, such as the IFC Performance Standard on involuntary resettlements.' In addition, in its Statement on respect for human rights, the Company indicates: 'Eni is committed to taking action to avoid the resettlement of local communities. In such cases where this cannot be avoided, Eni carries out free, prior and informed consultations with the affected people in order to reach joint agreements, fair compensation and improvements to living conditions, in line with the IFC Performance Standards.' [Sustainability Report, 31/12/2017: eni.com & Statement on respect to Human Rights, Dec 2018: 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 commit to 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] |
| 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: Regular stakeholder design engagement: In its website section 'The identification of Salient Human Rights issues', 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 on the way Eni is handling the most relevant areas of attention on human rights. 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 BHR. [...] Inputs and feedbacks received during these meetings have been integrated in the development and planning of policies and tools, interesting both Eni’s policy commitment and its due diligence process, leading to a general |

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|----------------|--|------------------|--|
| | | | enforcement of the company approach to human rights in these areas.' [The identification of Salient Human Rights Issues, Mar 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, Dec 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. 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, Dec 2018: eni.com] • Met: Collaborating with other remedy initiatives: In its website section 'Access to Remedy', the Company states: 'Consistently with 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, Mar 2019: https://eni.com/companies/list_of_disclosure_-_easy_format.docx#_Hlk3366905 1,3908,3999,0,,eni.com] • Not met: Work with EX BPs to remedy impacts |
| A.1.6 | Commitment to respect the rights of human rights defenders | 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: Zero tolerance attacks on HRs Defenders (HRDs): In its Statement on respect for Human Rights the Company 'prohibits, and undertakes to prevent, retaliation against workers and other stakeholders for raising human rights-related concerns, and neither tolerates nor contributes to threats, intimidation, retaliation or attacks (both physical and legal) against human rights defenders and affected stakeholders in relation to its operations.' [Statement on respect to Human Rights, Dec 2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects EX BPs to reflect company HRD commitments: In addition, in its Statement the Company indicates: '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. Where Eni's leverage is relatively limited (for instance with non-operated Joint Ventures and in general where Eni has a low level of participation), Eni will make all reasonable efforts in order to guarantee that the Joint Ventures' policies and practices are fully aligned with the principles included in this Statement.' [Statement on respect to Human Rights, Dec 2018: eni.com] |

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) and its latest Statement on respect for Human Rights are approved by the Board of Directors. [Code of Ethics, 23/11/2017: eni.com & Statement on respect to Human Rights, Dec 2018: eni.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|---|
| | | | <ul style="list-style-type: none"> Met: Board level responsibility for HRs: In its document 'Integrating Human Rights in our Organization' the Company summarizes the responsibilities of the Board on respect to HR: 'The central role of the Board of Directors and the CEO: the Board approves - after the CEO's proposal - the Company's strategy and objectives, including those related to sustainability. The CEO ensures the implementation of Board resolutions, reporting the results to the Board periodically. The Board of Directors is also responsible for approving the most important internal policies, including the Eni's Statement on respect for Human Rights and the Code of Ethics, an integral part of the Company's Compliance Model (Model 231), which sets out rules of behaviour in the Company's activities, including respect for Human Rights. Sustainability issues play a key role in the Board's agenda, and among these Human Rights are a focus of attention.' [Integrating Human Right in our Organization, 22/06/2018: eni.com] <p>Score 2</p> <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, Mar 2019: eni.com & Building sustainability into our business, 04/07/18: mingalarrealestateconversation.com] |
| A.2.2 | Board discussions | 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: Board/Committee review of salient HRs: According to its document 'Integrating Human Rights in our Organization', in 2018, the Board addressed different issues, which directly concern Human Rights or are particularly relevant to the topic. Among these issues: 'HSE Performance in 2017, which examines issues with a direct impact on respect for Human Rights by Eni, such as, for example, the right to safe and healthy working conditions, the right to the highest attainable standards of physical and mental health, which applies not only to workers but also to local communities; Sustainability scenario, which sets out emerging issues – including those connected with respect for human rights – and the initiatives Eni has planned in this area; Updating of the UK "Modern Slavery Act" Statement 2017, which illustrates the measures taken to counter the adverse impact of modern slavery and human trafficking on workers both within Eni's operations and in the supply chain, with a specific focus measures adopted to identify, prevent and mitigate risks on forced labour, contemporary slavery and human trafficking.' [Integrating Human Right in our Organization, 22/06/2018: eni.com] Met: Examples or trends re HR discussion: See above [Integrating Human Right in our Organization, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both examples and process: As above [Integrating Human Right in our Organization, 22/06/2018: eni.com] |
| A.2.3 | 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: Incentives for at least one board member: The Company indicates in its 'Integrating Human Rights in our Organization' document: 'As per the CEO's 2018 performance indicators, for instance, particular relevance has been assigned to the environmental sustainability and human capital objective, with an overall weight of 25% in terms of reduction of CO2 emissions and the Severity Incident Rate (SIR). SIR measures the frequency of total injuries recordable over the number of hours worked, considering both employees and third parties' staff, assigning them increasing weights depending on the severity of the incident.' [Integrating Human Right in our Organization, 22/06/2018: eni.com] Not met: At least one key EX RH risk, beyond employee H&S: See above. However, it does not include the health and safety of local communities. [Integrating Human Right in our Organization, 22/06/2018: eni.com] <p>Score 2</p> <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 | <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 • Met: Senior responsibility for HR: 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] <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: See above. However, there is no further information on the aspects of its human rights commitments included in the incentive scheme to check if it comply with the requirements of this subindicator. [Integrating Human Right in our Organization, 22/06/2018: eni.com] <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 risks is integrated as part of enterprise risk system: In its document 'Integrating Human Rights in our Organization', the Company indicates: '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.' [Integrating Human Right in our Organization, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Audit Ctte or independent risk assessment: According to its document 'Integrating Human Rights on our Organization': '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.' [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 | 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 A1.2. • 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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>(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> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Met: Communication of policy commitments to stakeholder: In its document about 'Community engagement and other processes to ensure respect for host communities rights', the Company indicates: '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. Consultations are also an opportunity for sharing and informing communities on Eni's approach to human rights and sustainability, in general, recalled in the Code of Ethics, in our Sustainability Policy and in the Eni's Statement on respect for human rights.' The Company also reports about engagement activities to communicate new human rights commitments to trade union representatives in a document named 'Working together with Rights-holders and strategic stakeholders for Workers' rights'. In addition, in its 'Specific policies on host community relations' document, the company summarizes all its commitment with respected communities. [Community engagement and other processes to ensure respect for host communities rights, Jul 2019: eni.com & Working together with Rights-holders and strategic stakeholders for Workers' rights, Jul 2019 (seen): https://eni.com/companies/list-of-disclosure-easy-format.docx#_Hlk3368405_1,6063,6213,0,,eni.com] • Met: How policy commitments are made accessible to audience: See above. The Company discloses information about the different initiatives and tools it uses to raise awareness on Human Rights and communicate its policies: training, seminars, meetings, webinars, website. In its document 'working together with Rights-holders and strategic stakeholders for Workers' rights', the Company states about one of the meeting with trade union representatives: 'Various matters are discussed at the annual meeting, including for instance Eni's economic-financial situations, Eni's actions and plans concerning HSE (including main HSE indexes related to employees and contractors)Eni's implementation of CSR actions and projects, whistleblowing (especially with regard to human rights), positive actions in favour of non-discrimination, etc.' [Our initiatives and tools to raise awareness on Human Rights, Jul 2019: eni.com & Working together with Rights-holders and strategic stakeholders for Workers' rights, Jul 2019 (seen): https://eni.com/companies/list-of-disclosure-easy-format.docx#_Hlk3368405_1,6063,6213,0,,eni.com] |
| B.1.4.b | Communication /dissemination of policy commitment(s) to business relationships | 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 all 4 ILO core conventions for suppliers • Met: Communicating policy to EX contractors and joint ventures: Eni communicates its human rights policy commitments to its business relationships via training and workshops. In addition, according to its 'Assessing and monitoring supplier's risk' document, 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. [Our Commitment to respect Human Rights, 22/06/2018: eni.com & Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] • Met: Including to EX BPs (removed) <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] • Met: Including on EX BPs: In its Statement on respect to Human Rights, the Company indicates: '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. Where Eni's |

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| | | | leverage is relatively limited (for instance with non-operated Joint Ventures and in general where Eni has a low level of participation), Eni will make all reasonable efforts in order to guarantee that the Joint Ventures' policies and practices are fully aligned with the principles included in this Statement.' [Statement on respect to Human Rights, Dec 2018: eni.com] |
| B.1.5 | Training on 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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: In its website section about 'Training on Human Rights', the Company indicates: 'Eni's training on Business and Human Rights is organized along three lines: general courses for all Eni people, specific courses on topics and areas particularly exposed to risks of negative impacts, and finally training initiatives on issues closely linked with Human Rights (es.: Code of Ethics, HSE, etc). [...] Training on the Code of Ethics is a further opportunity to raise awareness on Human Rights principles and Eni's commitments to respecting Human Rights; the training is mandatory for all Eni workers.' [Training on Human Rights, Mar 2019: eni.com] • Met: Trains relevant EX 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"> • Met: Score of 2 on A.1.2 • Met: Both requirements under score 1 met: See above |
| B.1.6 | Monitoring and corrective actions | 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: Scores at least 1 on A.1.2 • 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. In addition, in its document 'Assessing respect for labour standards and monitoring salient issues', the Company states: 'As provided for in the Global Framework Agreement (GFA), Eni meets workers' representatives on an annual basis to share information and consult them on Sustainability issues, including Human Rights.' [Assessing and monitoring the Human Rights Impacts of our activities, 22/06/2018: eni.com & Assessing respect for labour standards and monitoring salient issues: eni.com] • 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.). In addition, in its document 'Specific policies and processes to deal with risks from counterparties', the Company indicates: 'Human Rights have been integrated into the Due diligence checks preceding: mergers and acquisitions and other Investment transactions; negotiations of agreements with Joint Venture partners. In case red flags related to past human rights performances of the business partners arise, the company will adopt the appropriate measure to improve the Human Rights standards of the counterpart by exerting its power of leverage.' [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com & Specific policies and processes to deal with risks from counterparties: eni.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Met: Describes corrective action process: The Company indicates that 'Eni performs processes aimed at minimizing Human Rights risks deriving from the conduct of its counterparties and monitors compliance with these commitments over time. Should critical issues emerge, Eni requires the implementation of corrective actions. Where contractors' performance in terms of respect for human rights, Eni limits or prevents their participation in tenders. Of the 5.000 suppliers (and contractors) monitored in 2017, potential criticalities and/or possible areas of improvement were detected in 24%, however none were so serious as to compromise, in 95% of cases, the possibility of using these suppliers. The |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>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 & Assessing and monitoring suppliers' risks, 22/06/2018: eni.com]</p> <ul style="list-style-type: none"> • Met: Example of corrective action: The Company reports a case example of assessment/monitoring a 'supplier', where human rights abuses were identified: 'Lack of transparency in employment contracts with regard to remuneration conditions; impossibility for women who fall pregnant during the trial period to take advantage of maternity leave and no clear indication of the number of annual holidays'. It was defined a monitoring plan of a group of employees that information on salary calculation and the related payment is traced precisely and accurately, and an improvement plan to fill the gaps found in the employment contracts applied, particularly concerning maternity leave and holidays. A follow-up was carried out to make sure that contract clauses aligned with international standards and improving transparency on working conditions, including remuneration. [Eni for 2018 - Performance, 2019: eni.com & Assessing and monitoring suppliers' risks, 22/06/2018: eni.com] • Not met: Discloses % of EX 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 | 1.5 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection EXs 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] • Met: HR affects on-going EX business partner relationships: In its Slavery and Human Trafficking Statement 2018, the Company indicates: '[...] contracts signed by Eni with suppliers provide for Human Rights clauses and relevant sanctions in the event of non-compliance. [...] Should critical issues emerge, Eni requires the implementation of corrective actions. Where contractors' performance in terms of respect for Human Rights falls below minimum standards, Eni limits or prevents their participation in tender. [...] Criticalities and/or areas of improvement have been detected on 1,008 suppliers, for 95 of which the result has been a negative evaluation, failure (i.e. not qualification), or brought to a provisional measure (monitoring, state of attention with clearance, suspension or revocation of qualification). The number of suppliers Eni terminated the relationship with is decreasing compared with previous years and reflects the lower number of wrongdoings revealed by investigations carried out throughout the year' [Slavery and Human Trafficking Statement 2018, Apr 2019: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with EX 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: Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: In its Sustainability Report 2018, the Company indicates that its stakeholders are 'Identified according to GRI standards, AA1000 Accountability and International Finance Corporation guidelines'. The identified stakeholder include: Employees and Labor Unions, Local communities, Suppliers, among others. In this Report, the Company describes how it engages with its identified stakeholders: ' Eni has set up an IT platform called the Stakeholder Management System (SMS) dedicated to support the management of the complex network of relationships in the territories, monitoring the expectations of the populations and the results of development projects. This tool allows to survey and visualize, through a map, the relations with each category of stakeholder, highlighting any areas for improvement, with the possibility of better investigating the potential impacts on Human Rights, tracing the presence of vulnerable groups and the presence of areas of naturalistic and/or cultural value |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------|------------------|--|
| | | | <p>around the areas of activity, enabling a more conscious management of the operational realities.' [Sustainability Report - Eni For 2018, May 2019: eni.com]</p> <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement: See above (S1.i). In addition, the Company also reports about its stakeholder engagement activities by group. For instance, with Local communities: 'Involvement of over 200 communities in the territories in which Eni operates; Consultation activities with authorities and local communities for new exploration activities or for the development of new projects; Collaboration with the authorities and the local communities for planning, management and realization of initiatives for the community'; and with Contractors, Suppliers and Commercial Partners: 'Involvement of suppliers with Human Rights Assessment; Communication, feedback and improvement plans; Sharing the draft of the Supplier Code of Conduct on Eni's values of sustainability; Participation in the IPIECA(b) WG: Forum on Oil & Gas Sustainability best practices; Green sourcing project: identification of the levers in the supply chain for the reduction of environmental impacts'. However, it is not clear the frequency and what triggers the engagement. [Sustainability Report - Eni For 2018, May 2019: eni.com] • Not met: Engagement includes EX business partners workers: 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: Engagement includes EX business partners communities: In its document about 'Community engagement and other processes to ensure respect for host communities rights', the Company states: 'Whenever Eni operates in a host territory, the involvement of local residents is promoted through information sessions and community meetings. Moreover, the tools for the management of complaints, stakeholder mapping and participation in the management of social development projects are adopted.' However, it is not clear whether the engagement include local communities of its extractive business partners (for example joint ventures). [Community engagement and other processes to ensure respect for host communities rights, Jul 2019: eni.com] <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. On the other hand the Company discloses information about its identification of salient human rights issues, were it shared the list of issues identified 'with external stakeholders and preeminent experts in the field of business and human rights, in order to gather their feedbacks and suggestions on the way Eni is handling the most relevant areas of attention on human rights.[...] Inputs and feedbacks received during these meetings have been integrated in the development and planning of policies and tools, interesting both Eni's policy commitment and its due diligence process, leading to a general enforcement of the company approach to human rights in these areas.' <p>However, this is not sufficient to be awarded this indicator. [Human Rights in our internal legal framework, 20/03/2018: eni.com & The identification of Salient Human Rights Issues, Mar 2019: eni.com]</p> |

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 | 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: According to the information published in its website section 'Identification of Salient Human Rights Issues', 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, Mar 2019: eni.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <ul style="list-style-type: none"> • 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, Mar 2019: eni.com] Score 2 • 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: According to its website section 'Identification of Salient Human Rights Issues', in 2018, the Company shared the list of Salient HR Issues 'with external stakeholders and prominent experts in the field of business and human rights, in order to gather their feedbacks and suggestions on the way Eni is handling the most relevant areas of attention on human rights. 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 BHR.' [The identification of Salient Human Rights Issues, Mar 2019: eni.com] • Met: In consultation with HR experts: See above [The identification of Salient Human Rights Issues, Mar 2019: eni.com] • Met: Triggered by new circumstances: The Company applies the HRIA 'based on opinions, perceptions and concerns emerging from interviews 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. [...] Eni has been carrying out both processes based on considerations regarding the Human Rights risks potentially related to its specific business activities as well as the location of the business and risks specific to the area.' [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com & Impact Assessments: 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: 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. In addition, in its 'Human Rights Impact assessment' document the Company describes its actions to assess its Human Rights Impacts on its operations: 'Eni carried out four preliminary Human Rights Impact Assessments in its most challenging new projects from a Human Rights point of view in Mozambique, in 2018 and 2014, Angola, in 2018, and Myanmar, in 2016 with subsequent follow-ups in 2018. [...] All these HRIAs relied on the methodology and expertise of the Danish institute for Human Rights. This methodology foresees a preliminary analysis of scoping, based on desktop searches and remote interviews, and a field visit, where rights-holders (communities, workers, both direct employees and sub-contractors) are consulted during dedicated meetings. When needed focus groups are also held to allow the participation of vulnerable groups, such as children, women, etc. During the field visits, local NGOs, institutions, business partners and suppliers are engaged through meetings and interviews.' On the other hand, the Company indicates that 'Eni has carried out ten HRCAs since 2008. Other than in the company's headquarters, they were held in Eni's subsidiaries in Nigeria, Kazakhstan, Algeria, Egypt, Angola, Republic of Congo and Pakistan. A follow-up to the first HRCA was carried out in 2011, while in 2017 the company's headquarters and Eni's subsidiary in Angola |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <p>hosted a second HRCA due to various relevant developments affecting the company's activities.[...] The assessment processes led to the identification of the following priority issues: Security, Procurement, Human resources, Community relations, Ethics' [The identification of Salient Human Rights Issues, Mar 2019: eni.com & Impact Assessments: eni.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of salient risks: According to its website section 'Identification of Human Rights Issues': 'In the process of identifying Eni's salient Human Rights issues, the preliminary outcomes following the Workshop can be grouped into four main clusters: Discrimination and equal treatment based on religion, ethnicity and gender; Safe and healthy working conditions; Modern day slavery; Migrant workers; Freedom of 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.' These issues have been furtherly analysed and addresses in the next due diligence steps: assessing and monitoring. [The identification of Salient Human Rights Issues, Mar 2019: eni.com & Assessing and monitoring the Human Rights Impacts of our activities, 22/06/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: See above |
| 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. In addition, in its website section 'Human Rights Due Diligence', the Company disclose specific documents related with each one of the 4 human rights issues main clusters where it could be found: 'Eni's commitments and processes in place in relation to each function's Human Rights impact; A description of the processes and tools in place to identify, prevent, mitigate and account for Human Rights risks and impacts associated with each function.' [Sustainability Report, 31/12/2017: eni.com & Human Rights Due diligence, Mar 2019: eni.com] • Met: Including amongst EX BPs: The company indicates: ', with more general reference to Eni's business partners, specific clauses on Human Rights were introduced in 2018 to be included in agreements entered into with Countries and other companies, aimed at representing and binding the parties to act in line with the main international standards and to exercise a suitable form of leverage on them. Each business partner is also subject to a prior audit aimed at identifying the presence of any critical issues relating to the respect for Human Rights and provide for appropriate measures for their management' [Sustainability Report - Eni For 2018, May 2019: 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. More information in the website section 'Human Rights Due Diligence', which includes links to the following documents: Human Rights in the Workplace; Human Rights in our relations with suppliers and other business partners; Human Rights in host community relations. [Sustainability Report, 31/12/2017: eni.com & Human Rights Due diligence, Mar 2019: 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 | 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: The Company indicates: 'When needed, specific Human Rights Impact Assessments (HRIA) on E&P projects are also carried out according to a risk based approach, Thanks to the adoption of this tool and other ones, such as ESHIAs and HRCAs, opportunities and risks related to Human Rights were identified and specific relative mitigation measures were put in place in specific cases, for example in Myanmar, Ghana and Kazakhstan. Moreover, |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | risks and impacts | | <p>in some cases, albeit limited, follow-ups on projects previously interested by HRIA are also held. The purpose of these follow-ups is to verify the effectiveness of the actions that have been implemented, starting from the recommendations raised in the HRIA's Report, and to identify lesson learned to be scaled in other projects. [...] Relevant quantitative and qualitative indicators have been defined from among those used to measure and evaluate sustainability performance in order to track and evaluate the effectiveness of responses to Human Rights impacts on communities, according to the Operating Professional Instruction "Monitoring, reporting and audit activities'. However, evidence seems related to the cases of some HRIAs, and not in the context of tracking effectiveness of actions to tackle human rights risks in all cases [Assessing and monitoring impacts on human rights of host communities: https://eni.com/companies/list of Disclosure - Easy format.docx#_Hlk3369720 1,7496,7678,0,,eni.com]</p> <ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness: In its last Sustainability Report: Eni for 2018, the Company discloses information about its first HRIA in Myanmar, where risks of forced labor and other abuses of labor rights had been identified: ' Despite having noted the adoption of regulatory and contractual instruments aimed at ensuring compliance with international standards on Human Rights, the DIHR has highlighted, among the areas of particular criticality, the effective application of the clauses by the contractors towards their sub - contractors and the concrete monitoring possibilities available to Eni. In response to these challenges, some specific tools were developed, including a checklist for on-shore seismic acquisition aimed at accompanying the contractor in the management of sub-contractors and in relations with communities and other stakeholders, with a specific reference to the different operational phases. In 2018, at the end of the activities, the DIHR carried out a further assessment (i.e. follow-up) of the project which confirmed that Eni Myanmar has successfully implemented the mitigation measures recommended by the DIHR.' [Sustainability Report - Eni For 2018, May 2019: 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.' [The identification of Salient Human Rights Issues, Mar 2019: eni.com] • Met: Comms plan re assessing risks: The Company communicates its system to assess human rights risks and impacts and discloses its salient issues. [The identification of Salient Human Rights Issues, Mar 2019: eni.com & Assessing and monitoring the Human Rights Impacts of our activities, 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). [Human Rights Due diligence, Mar 2019: eni.com] • Not met: Comms plan re reviewing action plans [Sustainability Report - Eni For 2018, May 2019: eni.com & Assessing and monitoring impacts on human rights of host communities: https://eni.com/companies/list of Disclosure - Easy format.docx#_Hlk3369720 1,7496,7678,0,,eni.com] • Not met: Including EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: Although the Company reports actions taken to correct Human Rights abuses identified, there is no information describing how it has responded to specific human rights concerns raised by affected stakeholders and how it ensures the victims are able to access these communications. [Assessing and monitoring suppliers' risks, 22/06/2018: eni.com & Community engagement and other processes to ensure respect for host, 06/07/2018: eni.com] • Not met: Ensuring affected stakeholders can access communications |

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 | 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: 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. In addition, in its 'Whistleblowing process' document the Company indicates: 'Eni uses a reporting management system that enables anyone – whether third parties or employees – to send information 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.' [Access to remedy, Mar 2019: https://eni.com/companies/list-of-disclosure-easy-format.docx#_Hlk33669051,3908,3999,0,,eni.com & The whistleblowing process: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: In its 'Whistleblowing process document', the Company reports: 'Investigations were closed in 83 cases in 2017, of which 29 included Human Rights issues: these mainly concerned potential impacts on workers' rights. Of these 29 cases, 32 reports were examined: in only three of these cases did the audits confirm the reported facts, at least in part, against which actions were taken which contributed to mitigating and/or minimizing impacts' [The whistleblowing process: eni.com] • 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] |
| 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, 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] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <ul style="list-style-type: none"> • Not met: Expects EX BPs 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 BPs 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 consult users 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 | 1.5 | <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: 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. Grievances may also be lodged anonymously. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BPs to prohibit retaliation: The Company's Statement on respect Human Rights', says: 'Eni expects its Business Partners to respect the principles and |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | 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.' The Statement includes the prohibition of 'retaliation against workers and other stakeholders for raising human rights-related concerns, and neither tolerates nor contributes to threats, intimidation, retaliation or attacks (both physical and legal) against human rights defenders and affected stakeholders in relation to its operations.' [Statement on respect to Human Rights, Dec 2018: eni.com] |
| C.6 | Company involvement with State-based judicial and non-judicial grievance mechanisms | 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: Won't impede state based mechanisms: The Company states that it '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, Dec 2018: eni.com] • Not met: Complainants not asked to waive rights: In addition, the Company describes Grievance mechanism process, indicating: ' the Human Rights-based approach is integrated into the procedure as demonstrated by two requirements explicitly stated into the document: 1. The mechanism must not hinder access to legal or administrative remedies; 2. The actions and resolutions taken must be consistent with internationally recognized human rights. However, it is not clear if the company has ever in the past asked any stakeholder to waive their rights. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] <p>Score 2</p> <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, Mar 2019: https://eni.com/companies/list-of-disclosure-easy-format.docx#_Hlk3366905 1,3908,3999,0,,eni.com] • Met: Example of issue resolved (if applicable): As an example of an issue resolved through non-judicial mechanism, the Company presents the KPO engagement with NCP: '[...] a complaint had been logged by the Crude Accountability NGO to the OECD in 2013. KPO and its Partner companies [ENI included] engaged with the UK National Contact Point (NCP) during the review process in 2014-2017 and in December 2017 the UK NCP published its Final Statement. Although the OECD dismissed substantially all claims made against the Consortium Partners, in the view of the OECD, two former households of Berezovka should qualify for compensation arrangements. In the Final Statement the NCP recommends KPO to "regard both households as entitled to resettlement arrangements consistent with the current IFC standard for Involuntary Resettlement, and follow the steps identified in the standard to remedy any deficiencies in the arrangements actually offered to them, completing any action required by May 2018'. [KPO Sustainability Report 2017 (Non-judicial mechanism example), 2018: raexpert.kz] |
| C.7 | Remedying adverse impacts and incorporating lessons learned | 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: Describes how remedy has been provided: In its document 'Our Operational local grievance mechanism', the Company indicates: 'The local sustainability function examines the grievance and sends it to the function responsible for verification, who undertakes the necessary analysis and suggests the possible response; this process may or may not involve the complainants. If, based on this examination, the grievance can be considered major, the local sustainability function sends the proposal to the Eni's sustainability function, who then forwards the proposal to the head of the business function for approval. Once approved, the response is proposed to and discussed with the complainants. If accepted, the proposed resolution is signed by the complainants. If 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.' However, there is no specific information describing the approach it takes to provide or enable a timely remedy for victims. [Our Operational-Level Grievance Mechanisms, 31/08/2018: eni.com] • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • 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 | <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: Living wage target timeframe or achieved: 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.' <p>[Assessing respect for labour standards and monitoring salient issues, 26/06/2018: eni.com]</p> <ul style="list-style-type: none"> • 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. <p>[Assessing respect for labour standards and monitoring salient issues, 26/06/2018: eni.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Pays living wages: As above <p>[Assessing respect for labour standards and monitoring salient issues, 26/06/2018: eni.com]</p> <ul style="list-style-type: none"> • Not met: Reviews living wages definition with unions: In its document 'Assessing respect for labour standards', the Company indicates: '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.' However, in the review do not intervene relevant trade unions. [Assessing respect for labour standards and monitoring salient issues: eni.com] |
| 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 and revenues 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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| 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 2018, the total recordable injuries rate (TRIR) of the workforce increased by 6% compared to 2017. The worsening was determined by the employees' index (due to an increase in accidents), while the contractors' index remained stable. [Eni for 2018 - Performance, 2019: eni.com] • Met: Lost days or near miss disclosures: The near miss in 2018 was 1,431. [Eni for 2018 - Performance, 2019: eni.com] • Met: Fatalities disclosures: There were four fatal accidents occurred to upstream contractors. [Eni for 2018 - Performance, 2019: 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 2018 Sustainability Reports, ENI set a safety target of zero injuries. [Sustainability Report - Eni For 2018, May 2019: 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 0.35 in 2018: 'The high-consequence work-related injuries index was affected by two events: one in Alaska (upstream contractor who suffered a serious injury to his right leg) and the other in Egypt (contractor who fell from a height).' [Eni for 2018 - Performance, 2019: eni.com] |
| 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] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <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) | 1.5 | <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: Approach to identification of land tenure rights holders: According its Sustainability Policy, 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. In addition, in its document 'Preventing and managing impacts on land rights' the Company describes its approach to land resettlement: 'it refers to informed and participatory consultations with the communities involved, and access to grievance and remediation mechanisms. The implementation of the Land Management Operations is monitored and feedback is sought from those affected by the project in order to ensure efficiency and/or provide remedy' [Preventing and managing impacts on land rights, starting from the adoption of internal standard: https://eni.com/companies/list-of-disclosure-easy-format.docx#_Hlk3370227 1,8360,8512,0,,eni.com & Community engagement and other processes to ensure respect for host, 06/07/2018: eni.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works: In its document about 'Preventing and managing impacts on lands rights', the Company indicates: 'Eni is committed to minimizing its socio-economic impact and implements specific operating instructions for land management activities. These internal instructions apply to all Eni's upstream subsidiaries and defines the procedures for land management activities which are in line with international principles and standards, such as those set out in the IFC Performance Standards and other equivalent documents and frameworks. It recognizes the right to proportional and appropriate compensation for those affected by the project based on the impact on their assets, or access to assets, and income sources and living conditions;'. However, it is not clear if legitimate tenure rights holder are involved in the determining valuation. [Preventing and managing impacts on land rights, starting from the adoption of internal standard: https://eni.com/companies/list-of-disclosure-easy-format.docx#_Hlk3370227 1,8360,8512,0,,eni.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <ul style="list-style-type: none"> • Met: Steps to meet IFC PS 5 in state deals: In its Statement on respect for human rights, the Company declares: 'Eni is committed to taking action to avoid the resettlement of local communities. In such cases where this cannot be avoided, Eni carries out free, prior and informed consultations with the affected people in order to reach joint agreements, fair compensation and improvements to living conditions, in line with the IFC Performance Standards.' As an example of the steps taken to meet IFC PS 5, the Company presents the case of Eni Ghana land acquisition and one of its Monitoring Reports, where the implementation of PS 5 Land Acquisition is review and a summary of findings is reported. In addition, its Sustainability Report Eni for 2018, includes a reference to this case: 'To mitigate the effects of the project activities, Eni implemented support activities for impacted families in order to re-establish their livelihood, through the implementation of the Livelihood Restoration Plan (LRP) in Sanzule to restore family income generating activities in a sustainable manner to reach at least pre-project levels and improve the living conditions of the beneficiaries. The LRP, which is part of the broader Environmental and Social Action Plan (ESAP), was finalised in accordance with international standards, in particular with IFC PS5 (International Finance Corporation Performance Standard Number 5) on land acquisition and involuntary resettlement, also to fulfil the contractual obligations to receive financing related to the activities of the business project.' [Environmental and Social Monitoring Report, Mar 2018: vitol.com & Sustainability Report - Eni For 2018, May 2019: eni.com] • Not met: Describes approach if no recent deals |
| 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: 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: According to its document Eni for 2018, the Company 'delivers training initiatives and refresher courses for Eni security personnel both in the classroom (for new Security Officers) and in e-learning mode. Thanks also to these courses, the percentage of the staff belonging to the Security professional area trained in Human Rights reached 96%. Since 2009, Eni has been conducting a training program for public and private security forces at its subsidiaries in a number of Countries' [Sustainability Report - Eni For 2018, May 2019: 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] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| 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”. In its last Sustainability Report - Eni for 2018, the Company indicates: 'In 2018, initiatives to reduce impacts in water-stressed areas and freshwater withdrawals continued, as did projects in the upstream sector to give access to water to the populations in areas where Eni operates. In Italy, Eni is committed to increasing, over the period of the four-year plan, the amount of polluted groundwater treated and reused for civil or industrial purposes, to launching initiatives and assessments for the use of poor quality water (waste water or water from polluted groundwater, as well as rainwater and desalinated sea water), replacing fresh water, and reducing the water intensity of production.' [Eni Guidelines on the Protection and Promotion of Human Rights, 17/04/2007: eni.com & Sustainability Report - Eni For 2018, May 2019: 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. In addition, in its last report Eni for 2018, the Company indicates that it 'is committed to increasing, over the period of the four-year plan, the amount of polluted groundwater treated and reused for civil or industrial purposes, to launching initiatives and assessments for the use of poor quality water (waste water or water from polluted groundwater, as well as rainwater and desalinated sea water), replacing fresh water, and reducing the water intensity of production.' [Sustainability Report, 31/12/2017: eni.com & Sustainability Report - Eni For 2018, May 2019: eni.com] Met: Reports progress in meeting targets and shows trends in progress made: In Eni for 2018, the Company reports about its progress made: 87% freshwater reused, < 2% freshwater withdrawals in water stress areas. In addition, the Company discloses information of about its project to reduce both seawater and freshwater withdrawals at EniPower site in Brindisi: 'Thanks to the project, freshwater consumption can be reduced by 52%, equal to about 990,000 m3 /year, i.e., about 13% of the water consumption of a city the size of Brindisi.' [Sustainability Report - Eni For 2018, May 2019: 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"> • 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 | 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 publicly in a hearing in the Hague. However, CHRb could not find evidence that ENI has made any public comments 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 [Statement on respect to Human Rights, Dec 2018: eni.com] • Not met: Policies apply to the type of business relationships involved [Statement on respect to Human Rights, Dec 2018: 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. |
| 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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <ul style="list-style-type: none"> • 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 stakeholders, particularly federal and state government agencies is essential to address the ongoing problem of re-pollution'. • 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. <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 floodings. 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>Through the complaint, the community is seeking mediation from the Italian and Dutch National Contact Points (NCP), hoping that ENI will take responsibility for building and maintaining an adequate drainage system to end the annual flooding, and compensate and assist Aggah residents whose rights have been violated.</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. <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." |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| 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 | <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 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] • 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"> • Not met: Remedies are satisfactory to the victims: The case is currently before the Italian National Contact Point, and thus the remedy provided so far cannot be considered as satisfactory to the victims. [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 following engagement with the affected stakeholders. [ENI Response to Aggah community Facing Finance report, 16/07/2018: business-humanrights.org] |

F. Transparency (10% of Total)

| Indicator Code | Indicator name | Score | Explanation |
|----------------|--|---------------|---|
| F.1 | Company willingness to publish information | 3.79 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 36 cases, leading to a disclosure score of 3.79 out of 4 points. |

| Indicator Code | Indicator name | Score | Explanation |
|----------------|----------------------------------|--------------|--|
| F.2 | Recognised Reporting Initiatives | 2 out of 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <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 - Eni For 2018, May 2019: eni.com & GRI Index, 2018: 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 | 1.6 out of 4 | <p>ENI met 4 of the 10 thresholds listed below and therefore gets 1.6 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <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 • 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) <p>Discussing challenges openly</p> <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 <p>Demonstrating a forward focus</p> <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 2019 Key Findings report and technical annex 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.