



# Sustainability Statement

## LEGEND

- ▶ Link to the Management Report and to the Consolidated financial statements
- Internal links to the Sustainability Statement
- 🔗 External link



|  |            |
|--|------------|
| <b>General information</b>   | <b>134</b> |
| Sustainability for Eni   | 134        |
| Basis for preparation  | 134        |
| Process and results of the double materiality assessment           | 135        |
| Statement on due diligence   | 141        |
| The regulatory system  | 142        |
| Stakeholder engagement   | 143        |
| Main categories of stakeholders involved and methods of engagement | 144        |
| <b>Climate change</b>  | <b>146</b> |
| <b>Environment and Eni's management system</b>                     | <b>162</b> |
| Pollution  | 163        |
| Water resources  | 168        |
| Biodiversity   | 171        |
| Resource use and circular economy                                  | 175        |
| <b>EU Taxonomy</b>   | <b>178</b> |
| <b>Human rights for Eni</b>  | <b>180</b> |
| Eni's own workforce  | 183        |
| Health & safety  | 190        |
| Workers in Eni's value chain                                       | 195        |
| Local communities  | 199        |
| Clients and consumers  | 205        |
| <b>Business conduct</b>  | <b>209</b> |
| <b>Reporting principles and criteria</b>                           | <b>218</b> |
| Introduction   | 218        |
| Policies: Code of Ethics and regulatory system                     | 219        |
| Metrics: methodologies   | 221        |
| Annex to EU Taxonomy   | 230        |
| <b>Content index</b>   | <b>253</b> |



# General information

## SUSTAINABILITY FOR ENI

Eni's mission confirms its commitment to a Just Transition as the main challenge for the energy sector by balancing the need to ensure universal access to energy for a continuously growing world population with the urgency of tackling climate change through a more sustainable energy mix and a socially just transition. Inspired by the objectives of COP 21, Eni has developed a decarbonization strategy for the Group's products and industrial processes that aims for carbon neutrality by 2050. The energy transition is also a technological transition, which requires industrial capacity, innovation and collaboration to improve people opportunities. In this context, also thanks to the stakeholder engagement, Eni is committed to act responsibly, prevent and minimize potential negative social and environmental impacts on workers, communities, consumers and suppliers that may be associated with the company's traditional activities and the energy transition. Eni promotes a culture of health and safety at work across all its activities, aimed at preventing risks and protecting people, including employees and contractors, and its assets. At the same time, Eni plays an active role in the of human capital development, in promoting well-being, in protecting the environment and respecting human rights. In addition, Eni is committed to transparency, fighting any form of corruption and collaborates with its partners, including suppliers and customers, accompanying them towards sustainable development. Finally, to contribute to the achievement of the United Nations "Sustainable Development Goals" and to the growth of the Countries in which it operates, Eni is committed to building alliances with national and international development cooperation actors. These goals, also reflected in the company mission, are an important reference for Eni in managing the business activities. This approach is also confirmed by the application, from January 1<sup>st</sup> 2021, of the 2020

Corporate Governance Code, which identifies "sustainable success" as the guiding objective for the management's action; the Eni's **► Business model** also incorporates these sustainability principles.

## BASIS FOR PREPARATION

Eni's 2024 Consolidated Sustainability Statement (hereafter Sustainability Statement) is prepared in accordance with Legislative Decree 125/2024 and the European Sustainability Reporting Standards (ESRS), including the disclosure obligations provided for by Article 8 of EU Regulation 852/2020 (**■ European Taxonomy**). The document follows the structure of the topical standards and it is divided into three areas: environmental, social and governance; to avoid duplication regarding topics already covered or for further information, the Sustainability Statement refers to other sections of the Management Report for topics already covered or for further information (as shown in the table below and in the **■ Content Index**, which includes the list of all datapoints, their cross-references, the adoption of transitional measures, the so-called phase-in, and information deriving from other EU laws). In particular, the **► Management Report** describes Eni's business model and governance, the Integrated Risk Management system and the risk and uncertainty factors detailing the main risks and impacts along with the mitigation actions. The Sustainability Statement, prepared on a consolidated basis, is approved by the Board of Directors and is subject to limited assurance. For further details on the basis for preparation (consolidation area, methodologies for calculating the indicators, glossary, etc.), please refer to the **■ Reporting principles and criteria** section at the end of the document.

### CROSS-REFERENCE TABLE

| REQUIREMENT OF ESRS STANDARD                            | REFERENCE  |
|---|--|
| Corporate Management, Governance and Remuneration Model | <b>► Management Report/Governance</b>                              |
| Business Model, Strategy and Value Chain                | <b>► Management Report/Activities, Business Model and Strategy</b> |
| Due Diligence Statement                                 | Sustainability Statement   |
| Internal Control System in the Sustainability Statement | <b>► Management Report/Governance</b>                              |
| Stakeholder engagement activity                         | Sustainability Statement   |
| Risk Management Model                                   | <b>► Management Report/Integrated Risk Management</b>              |
| Materiality Analysis and material IROs                  | Sustainability Statement   |
| Thematic Standards and Taxonomy                         | Sustainability Statement   |
| Reporting principles and criteria                       | Sustainability Statement   |
| Content Index   | Sustainability Statement   |



## PROCESS AND RESULTS OF THE DOUBLE MATERIALITY ASSESSMENT

The 2024 materiality assessment, aimed to identify the sustainability issues most relevant to Eni and its stakeholders, has been updated based on ESRS standards to include the two perspectives of double materiality, through: (i) the identification of the most significant impacts – positive and negative, actual and potential – generated by the organization on the environment and people, including human rights impacts (so-called “impact materiality” or “inside-out” perspective); (ii) the identification of risks and opportunities arising from sustainability related topics that may significantly affect the company’s development, performance and financial position in the short, medium or long-term (so-called “financial materiality” or “outside-in” perspective). Eni’s materiality process included the following phases:

- **Identification of the list of potentially relevant material topics related to Eni’s activities and its value chain<sup>1</sup>, both upstream and downstream**, with a top-down approach that considered the company’s objectives, the insights from benchmark and context analyses<sup>2</sup>, the aspects required by the ESRS and the GRI industry standards, and the results of the human rights due diligence process and particularly the mapping of Eni’s so-called Salient Human Rights Issues<sup>3</sup> (see [Human rights for Eni](#)). Moreover, the materiality assessment of Eni and its subsidiaries of the previous year was also taken into account. In addition, in order to reflect the interests of different stakeholders, the priority material topics reported by the functions that engage with different groups of stakeholders during the year were considered (see [Stakeholder Engagement](#)).
- **Identification of impacts, risks and opportunities (IROs) associated with potentially relevant topics.** The identification of impacts relied on both the analysis of public sources<sup>4</sup> and the advice of internal managers. In fact, thanks to their experience, they identified the

impacts in relation to the company activities, considering any relevant aspects of the value chain, as well as specific activities in the various business operations, and geographical areas that could be subject to high risk of negative impacts. The identification of risks associated with potentially significant issues is carried out through a broader Integrated Risk Assessment process, ([Integrated Risk Management](#)) in which risks are identified, analysed and measured in relation to the achievement of Eni’s main targets. The results of the assessment also include risks associated to ESG issues, including risks deriving from dependencies on natural, human and social resources and risks related to impacts on the environment and people. The opportunities were identified in alignment with the Strategic Plan, ensuring the identification of initiatives actually pursued by the company.

- **Definition of the Impacts, Risks and Opportunities (IROs) assessment model**, in which, in accordance with the ESRS standards and the EFRAG Guideline on materiality, assessment scales have been identified. The drivers connected to the scales have been defined, (i) for impact materiality, in terms of significance, expressed as a combination of the ratings assigned to magnitude, scope and irremediable nature (the latter for negative impacts) of each impact, in relation to the likelihood of occurrence<sup>5</sup> (ii) for financial materiality, in line with the Integrated Risk Management model, risks are assessed by combining the likelihood of the risks with the magnitude of the effects, measured by quantitative and qualitative metrics (e.g., respectively, economic-financial, based on the reduction of operating cash flow or net profit, and reputational, based on the duration of the effect and the stakeholders involved).

(1) For more details on Eni’s value chain, see [Activities](#).

(2) With reference to the analysis relating to the value chain, see [Value chain and main impacts](#).

(3) This materiality assessment, limited to social topics, is drawn up on the basis of the mapping activities of the so-called salient human rights issues, and therefore includes the potential negative impacts in relation to the most significant issues in the field of human rights (see [Human rights for Eni](#)), in line with the provisions of the international reference instruments; the representation of the impacts actually verified in the reporting year takes place in the “Actions” sections, within the various social thematic chapters.

(4) For example, ENCORE (a platform that, depending on the sector it belongs to, contributes to the identification of impacts, risks and dependencies related to the environment) and the WBCSD publications for the Oil & Gas sector for environmental impacts and the UNEP Tools for social impacts.

(5) The likelihood of current impacts has not been assessed, as the impact has occurred.



For both perspectives, the model provides the likelihood to be assessed on a scale from 1 to 5, and the significance (impact materiality) and magnitude of effects (financial materiality) to be assessed on scales from 1 to 5. For opportunities, the materiality testing is carried out by considering the combination of likelihood assessment and materiality, the latter assessed using a qualitative scale (defined by two relevance levels) and a quantitative scale based on the level of Capex and Opex. Regarding the likelihood of occurrence, a two-dimensional scale is used, the highest level of which is associated with opportunities included in the four-year strategic plan. The negative impact of climate change has been considered significant based on the scientific consensus.

• **Assessment of the significance of IROs.** For the impact materiality, the assessment was carried out by the competent corporate functions at central level through an IT platform<sup>6</sup> that tracks the assessment process. A number of key subsidiaries were then involved to identify and assess potential additional impacts specific to their business/sector<sup>7</sup>. On the basis of the overall assessments, impacts were selected as materials when, on the basis of a two-dimensional matrix that considers likelihood and relevance, they exceeded the materiality threshold defined internally (corresponding to Tier 1 and 2 out of a total of 3). For financial materiality, risks are assessed in terms of likelihood and magnitude of effects and represented in a matrix that distinguishes three areas (Tier 1, 2, 3 in descending order of importance): the risks in Tier 1 and Tier 2 categories are considered as the main risks of Eni or Top Risk (see ► [Integrated Risk Management](#)). All Top Risks associated with potentially material topics are considered material risks for the purposes of financial materiality. Assessments are based on data and assumptions, that vary according to the nature of the risk; these assumptions take into account, where available and according to their significance, both historical series of events that have occurred and prospective estimates defined with the support of specialist functions (e.g. market scenario forecasts). The scope of risk assessment activities is determined by applying qualitative and quantitative criteria for the selection of subsidiaries included in the assessment process, in order to ensure adequate levels of coverage of the company's objectives. The assessment of opportunities is an integrated process which, in addition to the Sustainability and Integrated Risk Management functions, involves the Strategic Planning department to ensure consistency with business plan forecast and with the actual initiatives implemented or planned.

Based on the assessment of strategic and economic significance carried out, only Tier 1 opportunities were considered.

- **Engagement with targeted experts regarding the results of the impact materiality assessment following the internal evaluation; these meetings were held with experts** of the material topics subject to evaluation and/or the CSRD, such as international organizations engaged in sustainability issues, auditing/consulting firms, financial institutions.
- **Definition of the list of relevant IROs and final calibration**, which provides, based on the assessments carried out and, where applicable, the established thresholds, the prioritization of impacts, risks and opportunities relevant to the company and the possible elimination of non-material IROs. Finally, the results of the assessment were analyzed from an overall perspective, taking into account both what has emerged during the meeting with the experts and the company strategy, in order to calibrate the final list of impacts, risks and opportunities. The results of the assessment, particularly those concerning relevant IROs, were presented to<sup>8</sup> the Control and Risk Committee, the Sustainability and Scenarios Committee and the Board of Statutory Auditors and, to the Board of Directors when the Sustainability Statement was approved.

In identifying impacts, risks and material opportunities, all the Group's business lines were considered to ensure a complete assessment and an initial assessment of the impacts generated by its activities along the value chain was carried out (see the ► [Value chain and main impacts](#)), which will be further explored in the coming years. In addition, the ideas that emerged from the continuous dialogue with the different categories of Eni stakeholders were taken into consideration (see ► [Stakeholder Engagement](#)). The table shows the results of the materiality assessment associated with the ESRS topics<sup>9</sup>. Compared to last year, the materiality analysis has been updated taking into account the requests of the ESRS which, as indicated above, in addition to extending the scope of assessment to opportunities and the value chain, defines the reference methodology. The results of the analysis confirm a substantial alignment of the material topics of the past year. Based on the identification of the material IROs, the corresponding topics and sub-topics as well as the related material datapoints of the ESRS standards have been identified, and are disclosed in the thematic chapters, where the specific impacts and

(6) This platform allows the corporate functions to assess the impacts, with consequent traceability of the assessments and related changes. Moreover, the materiality assessment of the KPIs associated with the various topics has also been tracked.

(7) For further information on the possible connection between material impacts and commercial activities/relationships, see the sections describing the IROs in the individual chapters.

(8) The involvement of the administrative and supervisory bodies took place during the specific presentation of material IROs for the Sustainability Statement. The management was involved, based on their specific responsibility, in the IRO evaluation processes.

(9) The impacts, risks and opportunities shown in the table are associated with the topics proposed by the ESRS to which aspects relevant to the business and/or the sector have been associated (such as Asset Integrity aspects for safety, transparency of payments in the broader topic of Business Conduct and Cyber security as an aspect related to the privacy topic of the ESRS).



the connections with the activities and strategy are explored in depth. To support the materiality assessment process, appropriate control measures have been defined, in line with the best practices of reference and integrated into the overall internal control system on financial and non-financial reporting. For more details on the business activities about material impacts and related actions to the identified IROs, please refer to the in-depth analysis on IROs in the individual thematic chapters. The effects of IROs on the business model and strategy are also addressed within these thematic sections including, for example, the climate strategy which is closely linked to the business model and the supplier engagement strategy for a sustainable supply chain. Regarding the main strategic, industrial, market and regulatory risks to which the Group is exposed, please refer to the ► [Integrated Risk Management](#) and ► [Risk factors and uncertainties](#),

while for further information on the Group's results in 2024, please refer to the ► [Financial Review](#). With regard to the current financial effects deriving from material risks and opportunities, there is nothing to highlight during the year; for further information on the results of the impairment test and on the provisions for the financial statements, in particular those related to site restoration and abandonment (for which the amortization is concluded), to environmental remediation and to the dismantling/removal of industrial plants that are not competitive in the current market scenario, for which there are no economic alternatives for conversion, (see ► [Note 21 "Provisions"](#) of the Consolidated Financial Statements). In addition, please refer to the paragraph dedicated to the ■ [European Taxonomy](#) for a reclassification of investments based on the technical criteria provided by the European Regulation.

(15) This impact was also noted in the environmental section.



## FINANCIAL MATERIALITY

RISKS<sup>15</sup>

## OPPORTUNITIES

|  |  |
|--|--|
| Climate Change (physical and transition risks) | <p>Opportunities to develop products and services with reduced emission impact and technologies for the mitigation and offsetting of GHG emissions:</p> <ul style="list-style-type: none"> <li>• Renewable capacity development</li> <li>• Electric vehicle charging points</li> <li>• Biorefining with Agri Feedstock</li> <li>• Chemistry from renewable raw materials</li> <li>• CCUS project development</li> <li>• Magnetic fusion</li> </ul> |
| Accidents                                      |  |
| Blowout  |  |
| -  |  |
| -  |  |
| -  | Expansion of the remediation and waste treatment business thanks to technological development and internal know-how in view of the growing demand for these services on the market <sup>14</sup>   |
| Accidents                                      |  |
| Blowout  |  |
| Global Security Risk                           | Attraction and retention of qualified human resources for new businesses   |
| Biological Risk                                |  |
| -  | -  |
| Relationships with local stakeholders          | Ensure access to new business opportunities through discussion and engagement with local stakeholders and in collaboration with civil society organizations and institutions   |
| Accidents                                      |  |
| Blowout  |  |
| -  | Opportunities to develop products and services with reduced emission impact and technologies for the mitigation and offsetting of GHG emissions <sup>16</sup>  |
| -  | Growth in the sustainability performance of the Eni supply chain and the business system, with a leadership role for Eni in the Open-es alliance and digital platform  |
| Cyber Security                                 | Use of collaborations, skills and technological insights from outside, developing and enhancing technologies internally to meet operational needs from the business  |

(16) This opportunity is already reported for the Climate change topic and also reported here, as it is also aimed at end customers.

(17) The impact is represented separately, as research and technological innovation activities make it possible to access new energy resources, and is therefore transversal to all business activities, but is considered material in particular within the [Climate change](#) topic, in line with the draft EFRAG sector standard.

(18) Represented separately for the simplicity and conciseness of the representation, but the impact related to Cyber security is underlying the social aspects and is linked to the sub-topic Privacy: for workforce, workers in the value chain and customers and consumers.



## The resilience of the strategy to material IROs

The assessment of the resilience of the strategy with respect to material impacts, risks and opportunities is integrated into the process of defining the Strategic Plan starting from the preparation of the proposal, considering the underlying risk profile, up to the examination by the Board of Directors, which is called upon to assess the degree of compatibility of the risks with a company management in line with the strategic objectives identified. The assessment of compatibility between risks and strategic objectives is supported by the Integrated Risk Management activities that provide an overall view of the main corporate risks, including those related to sustainability issues; their assessment takes into account the mitigation actions implemented. The risk profile underlying the four-year Strategic Plan is further explored through the integrated assessment of the effects of risks on financial objectives, as well as the analysis of the de-risking effectiveness actions of the strategic risks. In addition, in the process of defining the Corporate Strategic Plan, considerations regarding the mitigation measures of negative impacts are integrated as well as aspects relating to the achievability of positive impacts and significant opportunities identified in order to ensure the achievement of the objectives set. With regard to safeguards, the Company adopts different solutions aimed at mitigating the significant impacts as well as exposure to the main risks to which it is subject, described in the ► [Integrated Risk Management](#) chapter and in the specific chapters of the Sustainability Statement. In addition, Eni conducts both dedicated scenario analyses, aimed at verifying the resilience of the strategy with respect to climate-related impacts and risks, (discussed in the ■ [Climate Change](#) chapter), and resilience analyses for ■ [Biodiversity](#). For social topics, Eni has adopted corporate ■ [Due Diligence](#) processes and systems in line with the reference frameworks and best practices, that allow the company to identify and manage the potential negative impacts related to its operations, its value chain, as well as its products or services and its business relationships (see ■ [Human Rights for Eni](#)).

## Value Chain and Main Impacts

Eni is an integrated energy company, operating across the entire value chain, from the exploration, development and extraction of resources<sup>19</sup> to the marketing of energy, products and services to end customers. Eni's ► [Business Model](#) combines the use of technologies, largely proprietary, enhancing internal skills and a strategic network of collaborations, with the development of an innovative satellite model, which provides for the creation of dedicated companies capable of independently accessing the capital market to finance their growth. Partnerships and alliances with stakeholders are relevant to the

achievement of these objectives to ensure their engagement in Eni's activities and in the transformation of the energy system. For the identification and assessment of potentially material topics for the value chain, for the first year of application of the CSRD Directive, an analysis was carried out based on the information currently available at company level regarding the impacts that can be generated within its value chain. On the basis of these insights, given the complexity of the value chain of a company like Eni, that operates in different geographical areas and industrial sectors, the assessment considered widespread impacts throughout the entire value chain, regardless of the business and specific activity. As regards the main impacts of the value chain, these were identified and analysed consulting with the internal departments in charge, and interviewing some external experts regarding the impacts, in order to assess their materiality. In addition, with regard to the upstream value chain, an in-depth study was carried out on the materiality assessment and the relevant issues for the main suppliers<sup>20</sup> through the analysis of their data declared on the Open-es platform<sup>21</sup>, corroborated by a comparison with the internal specialist functions that deal with procurement. Among the topics that emerged<sup>22</sup> from the in-depth studies, the material ones were selected based on the criterion of their pervasive presence along the entire supply chain; this threshold confirms the relevant topics already explored in the past reporting. **Climate change** has been identified as one of the main topics, with impacts both on upstream and downstream of the value chain. In particular: (i) industrial activities in the upstream business, considering the significant energy-intensive/emission profile of certain portions of the supply chain with particular reference to upstream industrial activities (such as drilling, production and construction of plants with high energy and emission consumption), generate emission impacts; (ii) in the downstream business activities, on the other hand, the emission impacts derive mainly from the use of the products and services sold (Scope 3, see ■ [Climate Change/Metrics](#) chapter). Another relevant topic concerns the potential impacts on workers' human rights, including safety, in particular in the supply activities characterized by a high use of labour, such as maintenance, construction or general service activities, defined as "labour intensive" (see ■ [Workers in Eni's value chain](#) chapter). In addition, the significant involvement of large operators (e.g. EPC Contractors) who in turn have important supply chains, could generate potential negative social and/or environmental impacts, if not adequately managed. The breadth and complexity of the value chain, involving a plurality of jurisdictions, determine a greater exposure to the impacts deriving from the loss of confidentiality of information related to cyber security aspects and, regarding the

(19) For more information on the types of revenues, see ► [Financial review](#).

(20) Suppliers belonging to the MSG Procurement boundary holding the contracts of the most significant value.

(21) Platform to support companies in the path of measurement and growth in the ESG field with the aim of creating value and benefits for the entire entrepreneurial system.

(22) Among the material issues for the Value Chain, it should be noted that the following issues emerged from the analysis of the data of strategic suppliers on the Open-es platform: (i) climate change; (ii) human rights of workers; (iii) ESG oversight in the supply chain.



upstream activities, to the impacts related to corruption episodes (see ■ **Business Conduct** chapter). At the same time, considering the downstream value chain, customer relationship management implies potential impacts related to unclear advertising campaigns or commercial practices, and the integration of communication systems represents a potential risk factor in the processes of managing information and related confidentiality (see ■ **Clients and Consumers**). For more information on the structure of the value chain, please refer to the ► **Activities** section.

## STATEMENT ON DUE DILIGENCE

Eni has established over time multiple corporate management processes and systems in the social, environmental, climate and business conduct fields, inspired by the most advanced industry standards. These processes and systems are integrated into corporate governance and strategy to ensure that Eni's operations comply with national and international regulations and promote responsible practices while conducting its activities. In particular,

human rights due diligence is in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. The due diligence with reference to climate change has only recently been made explicit in the OECD Guidelines (OECD Guidelines for Multinational Enterprises on Responsible Business Conduct - June 2023); to date, its implementation methods suffer from the absence of prescriptive rules and reference best practices<sup>23</sup> and are therefore still subject to interpretation. In this context, on the basis of the analyses carried out, Eni believes that it is substantially in line with the principles expressed by the OECD as represented in the ■ **Climate Change** chapter, provided that the attention and permanent monitoring of the reference regulatory corpus and best practices to follow its developments. In order to facilitate the consultation of the present document, the following is a mapping of the information provided within the Sustainability Statement regarding the Due Diligence process, considering that some activities may not be unequivocally refer to one of the "Phases of Due Diligence" indicated below.

| PARAGRAPHS OF THE STATEMENT   | PHASES OF DUE DILIGENCE  |                                     |   |  |   |  | E | S | G |
|---|--|-------------------------------------|---|--|---|--|---|---|---|
|   | Embedding due diligence in governance, strategy and business model | Engaging with affected stakeholders | Identifying and assessing adverse impacts | Taking action to address those adverse impacts | Tracking the effectiveness of these efforts and communicating |  |   |   |   |
| ► <b>Governance</b> section   |  |                                     |   |  |   |  |   |   |   |
| Double materiality Assessment Process and Results   |  |                                     |   |  |   |  |   |   |   |
| The regulatory system   |  |                                     |   |  |   |  |   |   |   |
| Policies (E1; E2; E3; E4; E5; S1; S2; S3; S4; G1) <sup>(a)</sup>  |  |                                     |   |  |   |  |   |   |   |
| Stakeholder engagement with specific paragraphs in the chapters related to the engagement of workers (S1), workers in the value chain (S2), communities (S3) and customers (S4) |  |                                     |   |  |   |  |   |   |   |
| Environment and Eni's management system   |  |                                     |   |  |   |  |   |   |   |
| Human rights for Eni  |  |                                     |   |  |   |  |   |   |   |
| Material impacts, risks and opportunities (IROs) Material (E1; E2; E3; E4; E5; S1; S2; S3; S4; G1)  |  |                                     |   |  |   |  |   |   |   |
| Actions taken on material IROs (E1; E2; E3; E4; E5; S1; S2; S3; S4; G1)   |  |                                     |   |  |   |  |   |   |   |
| Target and commitments (E1; E2; E3; E4; E5; S1; S2; S3; S4; G1)   |  |                                     |   |  |   |  |   |   |   |
| Metrics (E1; E2; E3; E4; E5; S1; S2; S3; S4; G1)  |  |                                     |   |  |   |  |   |   |   |

(a) E1, E2, E3, E4, E5, S1, S2, S3, S4, G1 refer to the environmental, social and governance standards of the ESRS.

(23) The main OECD reference sources on good business conduct are "OECD Due Diligence Guidance for Responsible Business Conduct" (2018), "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct" (2023), "Managing Climate Risks and Impacts Through Due Diligence for RBC - a tool for Institutional Investors" (2023), "Responsible Business Conduct for Climate Action" (2024). It is a framework of soft law regulations that defines general principles not declined by sector, with technical-scientific implications that are still being studied.

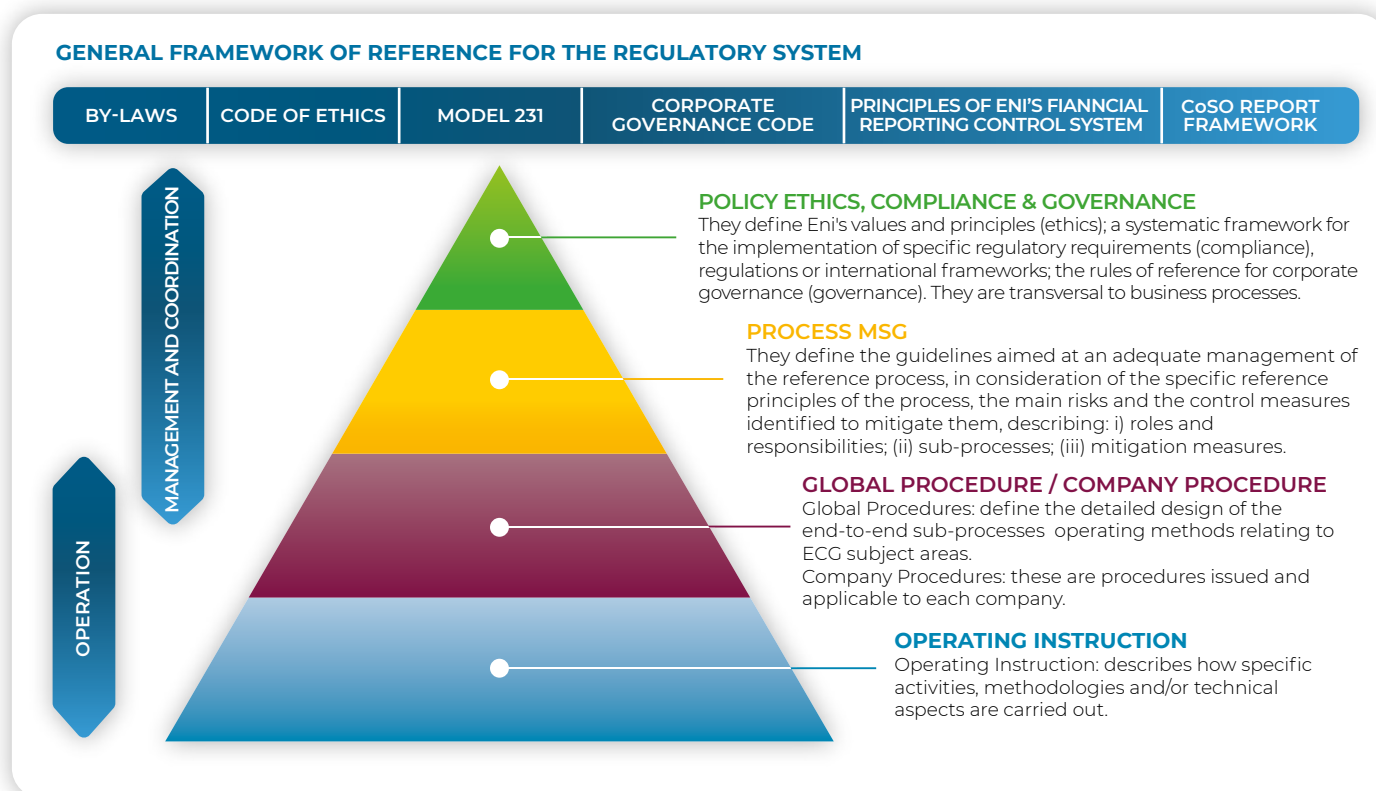


## THE REGULATORY SYSTEM

In order to allow the concrete implementation of the provisions of the mission and to guarantee the integrity, transparency, fairness and effectiveness of its processes, Eni adopts rules for the performance of corporate activities and the exercise of powers, ensuring compliance with the general principles of traceability and segregation. All Eni's operating activities can be traced back to a map of processes that are functional to the company's activities and integrated with the control needs and principles set out in the compliance and governance models and based on the By-laws, the Code of Ethics<sup>24</sup> and the Corporate Governance Code, Model 231, the principles of Eni's control system on financial and sustainability reporting and the CoSO Report Framework (Committee of Sponsoring Organizations of the Treadway Commission). On 26<sup>th</sup> January 2023, the Board of Directors of Eni SpA updated the fundamental lines of the Regulatory System Policy, following an update and revision project that led to an evolution of the architecture, instruments and rules of the Regulatory System in line with the operational and governance requirements

of the Eni's strategy that is based on decarbonization but also guaranteeing the security of energy supplies and the development of a satellite corporate model aimed at maximizing business value. An architecture based on 4 levels is confirmed<sup>25</sup>, combining management and coordination instruments aimed at managing business operations.

The regulatory instruments are published on the dedicated system accessible from the company website, while those most relevant to external stakeholders are accessible directly on the Company's website. In addition to the ECG Policy<sup>26</sup>, referring to some material topics, Eni has over time also adopted public positions on some specific topics, approved by the CEO or the Board of Directors. The contents of both the ECG Policy and the public positioning are explored in the chapters dedicated to material topics, which are also accompanied by the principles of the internal regulatory framework (described in the figure).



(24) The [Code of Ethics](#), renewed in 2020, expresses the corporate values that characterize the commitment of Eni's people and all third parties who work with the company: integrity, respect for and protection of human rights and the environment, transparency, promotion of development, operational excellence, innovation, team work and collaboration. These values support the company in defining the appropriate administration and control structure, in the adoption of an effective internal control and risk management system, in communicating with shareholders and other stakeholders.

(25) For an in-depth analysis of the regulatory system and its components, please refer to the [2024 Corporate Governance and Shareholding Structure Report](#).

(26) For further information, see the [Eni Policies: Code of Ethics and Regulatory System](#) chapter.



## STAKEHOLDER ENGAGEMENT

Eni considers stakeholder engagement a key element to achieve sustainability goals, creating long-term value while reducing business risks. For this reason, Eni involves all stakeholders to prevent and minimize any negative impacts of the energy transition. Continuous dialogue is also essential to pursue the objectives defined annually within the four-year and long-term Strategic Plan. In line with the Code of Ethics, Eni maintains relationships based on the principles of fairness, legality, transparency, traceability, respect for human rights, inclusion, gender equality and protection of the environment and communities. Operating in 64 Countries with different socio-economic backgrounds, understanding stakeholder expectations, with specific attention to vulnerable groups, participation and sharing of choices, objectives and business results foster solid relationships and mutual trust. This approach responds to the Recommendation of the Code of Governance, to which Eni has committed, according to which the Board of Directors itself promotes, in the most appropriate ways, dialogue with shareholders and other stakeholders relevant to the company and is based on the principles established by the Board of Directors in the Code of Ethics and in the Policy for the management of dialogue with investors. Continuous dialogue with each type of stakeholder takes place at all levels of the company according to defined responsibilities. In particular, Eni's commitment to carbon neutrality and a just energy transition requires a strong involvement: (i) of the **■ own workforce**, also

through adequate social dialogue, listening initiatives and reskilling and upskilling programs to support eventual relocations; (ii) of **■ suppliers** to identify and manage the impacts of the energy transformation, supporting small and medium-sized enterprises in particular, supporting them in the transformation process and maintaining competitiveness; (iii) **■ local communities** with the aim of contributing to the development of economic and social opportunities, maximising the positive effects of Eni's activities on the territory; (iv) **■ consumers** to promote conscious and efficient energy consumption and offer innovative energy solutions. In relation to these groups of right-holders, Eni has developed a **■ human rights** management system that has been integrated into the main corporate processes over the last five years. Finally, to support relations with local stakeholders, Eni has adopted a "Stakeholder Management System" (SMS), operating at central level and at the subsidiaries level, that allows the mapping of more than 7,400 stakeholders and makes it possible to support the definition of engagement strategies and the management of requests and critical issues raised by each stakeholder. The table below provides information for each category of stakeholders on how they are engaged, the goal of this engagement and the outcome resulting from this dialogue. This dialogue is taken into account when defining the corporate strategy and the **► Other commitments and targets on ESG issues**, as well as the business model.



## MAIN CATEGORIES OF STAKEHOLDERS INVOLVED AND METHODS OF ENGAGEMENT

| CATEGORY  | ENGAGEMENT GOAL  | ENGAGEMENT OUTCOME  |
|---|--|---|
| <b>ENI'S PEOPLE AND NATIONAL AND INTERNATIONAL UNIONS</b><br>  | <ul style="list-style-type: none"> <li>Establishing a relationship of trust between society, workers and trade unions</li> <li>Supporting workers' social protection and respect for HR (Human Rights)</li> <li>Sharing changes and skills development</li> <li>Promoting work-life balance</li> </ul>   | <ul style="list-style-type: none"> <li>Achievement of strategic objectives</li> <li>Up/reskilling skills</li> <li>Information and consultation of workers' representatives in strategic and operational processes</li> <li>Updating internal policies</li> <li>Participation in global initiatives and campaigns for people's well-being</li> </ul>   |
| <b>FINANCIAL COMMUNITY</b><br>   | <ul style="list-style-type: none"> <li>Ensure adequate understanding of:               <ol style="list-style-type: none"> <li>strategic choices, value drivers and operating context</li> <li>economic-financial performance and ESG</li> </ol> </li> </ul>  | <ul style="list-style-type: none"> <li>Prepare communications and presentations aligned with the expectations of the financial community</li> <li>Consider feedback from the financial community for policy development and improvement of ESG ratings</li> </ul>   |
| <b>LOCAL COMMUNITIES, COMMUNITY BASED ORGANIZATION AND ORGANIZATIONS FOR COOPERATION DEVELOPMENT</b><br> | <ul style="list-style-type: none"> <li>Consider local expectations and needs and implement development projects</li> <li>Identify potential negative impacts, prevention and mitigation measures, ensuring compliance with HR</li> <li>Promote and support dialogue and active cooperation, including by involving the authorities</li> <li>Establish strong and lasting relationships and partnerships with all the players in the area</li> </ul>  | <ul style="list-style-type: none"> <li>Dissemination of transparent information on Eni's activities</li> <li>Promotion and implementation of Local Development Programs in line with local needs and the strategic frameworks of the United Nations, sharing know-how and promoting synergies with the main actors of Cooperation</li> <li>Evaluation and measurement of local development through the use of tools and methodologies</li> </ul>          |
| <b>CONTRACTORS, SUPPLIERS AND COMMERCIAL PARTNERS</b><br>  | <ul style="list-style-type: none"> <li>Supporting suppliers in managing impacts on people and the environment, ensuring compliance with HR</li> <li>Promoting safety at work throughout the supply chain, ensuring safe and dignified working conditions</li> <li>Guiding suppliers on the energy transition path</li> <li>Optimization of compliance with a view to anti-corruption and HR due diligence on potential third parties at risk</li> <li>Foster supply chain competitiveness through the adoption of sustainable practices that strengthen the resilience of suppliers in global markets</li> </ul> | <ul style="list-style-type: none"> <li>Identifying, preventing and mitigating risks at every stage of the procurement process</li> <li>Building a safe, responsible, innovative and international supply chain for a fair and sustainable energy transition</li> <li>Promotion of training and awareness on ESG and HR issues</li> </ul>  |
| <b>CUSTOMERS AND CONSUMERS</b><br>   | <ul style="list-style-type: none"> <li>Supporting and promoting actions in favour of the just energy transition</li> <li>Create and spread the culture of sustainable energy usage, for conscious and efficient consumption</li> </ul>   | <ul style="list-style-type: none"> <li>Promotion of business relationships focused on customer needs</li> <li>Providing quality products and services in line with specific needs</li> <li>Supporting financially vulnerable clients, especially young people</li> </ul>  |
| <b>NATIONAL, EUROPEAN AND INTERNATIONAL INSTITUTIONS</b><br>   | <ul style="list-style-type: none"> <li>Contribute to the public debate on topics of interest, including the energy transition, by representing the company's position</li> <li>Creation of partnerships and memberships that promote Eni's business and/or corporate positioning</li> <li>Creation of partnerships for projects aimed at contributing to the socio-economic and health development of the Countries in which Eni is present</li> <li>Supporting transparent dialogue</li> </ul>  | <ul style="list-style-type: none"> <li>Representation of Eni's interests at the various institutions for the assessment of the impacts of policies and regulations</li> <li>Help improve policy effects and effectiveness</li> <li>Participation in consultations on policy proposals</li> </ul>  |
| <b>UNIVERSITIES, INSTITUTES, RESEARCH CENTERS AND INNOVATION HUB</b><br>                               | <ul style="list-style-type: none"> <li>Promote the development of skills and technological know-how to ensure the sustainable transition</li> <li>Activating an innovative ecosystem for the transition and new energy supply chains</li> <li>Assess and monitor the risks related to business activities on the health of workers</li> </ul>  | <ul style="list-style-type: none"> <li>Development of innovative solutions, such as magnetic confinement fusion</li> <li>Promotion of scientific research activities</li> <li>Supporting dialogue and skills for the transition</li> </ul>  |
| <b>ADVOCACY ORGANIZATION, TRADE/CATEGORY/ CONFINDUSTRIA ASSOCIATIONS</b><br>                           | <ul style="list-style-type: none"> <li>Supporting the business in the path of energy transformation and transition</li> <li>Sharing knowledge and experience in the energy transition path</li> <li>Promote discussion on solutions for energy production, research and development</li> </ul>   | <ul style="list-style-type: none"> <li>Definition of strategies to support the energy transition</li> <li>Support for global policies and regulations in the fight against climate change</li> <li>Promotion of sustainable mobility with alternative fuels and car sharing</li> <li>Promotion of new technologies in the blue economy</li> <li>Implementation of the Open-es platform</li> <li>Promotion of sustainable supply chain strategy</li> </ul> |



| ENGAGEMENT MODE  | 2024 ACTIVITIES  | MAIN TOPICS <sup>27</sup>   |
|--|--|---|
| <ul style="list-style-type: none"> <li>• Encounters</li> <li>• Workshop</li> <li>• Collaborations</li> <li>• Training and awareness-raising initiatives</li> <li>• Meetings of worker/company representative Committees.</li> </ul>  | <ul style="list-style-type: none"> <li>• Awareness of diversity and Zero tolerance policies</li> <li>• Share of the Golden Principles and Rules of Safety</li> <li>• Team building and youth enhancement</li> <li>• The results of the survey for the ~5,000 under 36 resources were analyzed and shared with management and specific initiatives were launched</li> </ul>   | <ul style="list-style-type: none"> <li>• Human capital</li> <li>• Occupational and process health and safety</li> <li>• Circular economy and waste management</li> </ul>  |
| <ul style="list-style-type: none"> <li>• Continuous dialogue, also with top management, through the participation/organization of: events, road-shows, conference calls, thematic conferences</li> <li>• Collaboration with ESG ratings</li> </ul>   | <ul style="list-style-type: none"> <li>• Quarterly presentations and Capital Markets Day</li> <li>• Participation in road shows and specialized conferences</li> <li>• One-on-one meetings with investors</li> <li>• Engagement with investors and proxy advisors on shareholders' meeting issues</li> <li>• Engagement with ESG rating agencies for rating issuance</li> <li>• ~850 funds contacted</li> </ul>  | <ul style="list-style-type: none"> <li>• Economic and financial performance</li> <li>• Climate change</li> <li>• Occupational and process health and safety</li> <li>• Biodiversity and ecosystems</li> <li>• Value chain workers</li> </ul>  |
| <ul style="list-style-type: none"> <li>• Consultations</li> <li>• Grievance Mechanism</li> <li>• Awareness campaigns</li> <li>• Workshop</li> <li>• Questionnaires and data collection</li> <li>• Institutional meetings</li> <li>• Initiatives and events in the area</li> <li>• Cooperation agreements with development cooperation organisations</li> </ul>   | <ul style="list-style-type: none"> <li>• Periodic communications on project progress</li> <li>• Request and grievance management</li> <li>• Monitoring activities</li> <li>• Baseline studies, feasibility studies, project evaluations</li> <li>• Presentation of objectives and results</li> <li>• Collaborations with United Nations Agencies (UNIDO, UNESCO, ILO, IOM) and civil society organizations (IRC, E4Impact, AVSI, Oikos Institute, Doctors with Africa CUAMM and AISPO) and National Cooperation Agencies (AICS and USAID)</li> <li>• 17 agreements signed for socio-economic development initiatives and 4 for community health initiatives</li> </ul> | <ul style="list-style-type: none"> <li>• Local development and access to energy</li> <li>• Climate change</li> <li>• Equal treatment</li> <li>• Community Health</li> </ul>   |
| <ul style="list-style-type: none"> <li>• Training programs and discussion of suppliers on specific ESG issues</li> <li>• Survey, assessment and monitoring of supplier performance</li> <li>• Awareness-raising activities on ESG issues through the initiatives of the Open-es Community</li> <li>• Enhancement of best practices</li> </ul>  | <ul style="list-style-type: none"> <li>• Expansion of the Open-es community: &gt;28,000 member companies</li> <li>• Extension of the application of the HR due diligence model</li> <li>• "Sustainable Supply Chain Finance" Programme</li> <li>• Safety &amp; Sustainability Award "Open-es ESG Skills" training program aimed at the entire supply chain</li> </ul>  | <ul style="list-style-type: none"> <li>• Occupational and process health and safety</li> <li>• Climate change</li> <li>• Human rights</li> <li>• Responsible management of supply chains</li> <li>• Anti-corruption</li> </ul>  |
| <ul style="list-style-type: none"> <li>• With customers: information activities through dedicated channels; focus groups; initiatives and events in the area</li> <li>• With Consumer Associations: initiatives and events in the area; dedicated channels</li> </ul>  | <ul style="list-style-type: none"> <li>• Maintaining customer satisfaction and service quality</li> <li>• 20 periodic meetings with Consumer Associations (~500 representatives in Italy)</li> </ul>   | <ul style="list-style-type: none"> <li>• Climate change</li> <li>• Customers and consumers</li> </ul>   |
| <ul style="list-style-type: none"> <li>• Meetings, working groups, think tank initiatives</li> <li>• Institutional dialogue</li> <li>• Participation in events, visits and economic promotion initiatives</li> <li>• Partnership</li> <li>• Communication with dedicated channels</li> <li>• In-depth analysis of geopolitical and energy scenarios, sustainable development and new technologies</li> </ul> | <ul style="list-style-type: none"> <li>• Eni's positioning on issues of interest to policymakers and in public events</li> <li>• Presentation of projects, visits of associations, institutional and political delegations to industrial plants, operational sites and research centers</li> <li>• Collaboration agreements</li> <li>• Elaboration of rankings and responses to public consultations</li> </ul>  | <ul style="list-style-type: none"> <li>• Climate change, energy transition and decarbonization of industry and transport</li> <li>• Sector discipline</li> <li>• Strategic industrial projects</li> <li>• Innovation, digitalization and cyber security</li> <li>• Sustainable development</li> <li>• Community health</li> </ul> |
| <ul style="list-style-type: none"> <li>• Collaborations</li> <li>• Projects</li> <li>• Hub</li> <li>• Agreements</li> <li>• Startups</li> </ul>  | <ul style="list-style-type: none"> <li>• New four-year agreement with MIT</li> <li>• Participation in the main national and international innovation hubs (e.g. National PNRR Centers and Innovation Ecosystems and National Technology Clusters)</li> <li>• First International Network on African Energy Transition launched</li> <li>• 8 business development hubs active in Italy and 2 abroad (Kenya and Congo)</li> <li>• &gt;100 innovative startup incubated/accelerated</li> <li>• Research activities in the health sector</li> </ul>  | <ul style="list-style-type: none"> <li>• Human rights</li> <li>• Climate change</li> <li>• Local development and access to energy</li> <li>• Health</li> </ul>  |
| <ul style="list-style-type: none"> <li>• Conferences and events</li> <li>• Debates</li> <li>• Training initiatives</li> <li>• Annual meetings and workshops</li> <li>• Participation in projects</li> </ul>  | <ul style="list-style-type: none"> <li>• &gt;200 companies involved in a sustainable growth path</li> <li>• Membership of ~10 territorial associations and 3 categories to Open-es;</li> <li>• Events and workshops to promote the use of biofuels (HVO), accelerate the decarbonization of the maritime and land-based sector</li> <li>• Support together with trade associations for activities in the field of green and blue economy</li> </ul>  | <ul style="list-style-type: none"> <li>• Energy transition</li> <li>• Sustainable mobility</li> <li>• Sustainability for companies</li> <li>• Local development and access to energy</li> <li>• Climate change</li> </ul>   |

(27) The topics and priority aspects for engagement with the different categories of stakeholders inform the materiality assessment.



# Climate change

## POLICIES AND CLIMATE GOVERNANCE<sup>28</sup>

### [DUE DILIGENCE PHASE 1]

Eni expresses its commitment to combating climate change in its Mission and in various company policies, including the Code of Ethics, as well as through the definition of a decarbonization strategy (For details, please refer to the [■ Decarbonization Strategy](#) section). As explained in the Mission, Eni "concretely supports a socially just energy transition, with the aim of preserving the planet, and promotes access to energy resources in an efficient and sustainable way for all". The [🔗 Code of Ethics](#) states that "Eni is determined to contribute positively to the achievement of the Sustainable Development Goals, supports a low-carbon and socially fair energy transition, and is among the signatories of the Paris Pledge supporting the objectives contained in the Paris Agreement. Our commitment to fighting climate change includes innovative solutions aimed at reducing the impact of our operations through the efficient use of natural resources, the protection of biodiversity and water resources, and supporting mitigation and adaptation actions in local contexts in which we operate. We are also committed to finding technological solutions that reduce the impact of our products and favor a circular approach". Eni promotes its responsible conduct along its value chain. In particular, it asks its suppliers to commit themselves to protecting the environment, optimising the use of resources, and contributing to the achievement of plant efficiency and emission reduction targets. This collaboration supports the company on the challenging path towards Carbon Neutrality. For further information, see the [🔗 Supplier Code of Conduct](#). As part of its advocacy activities, Eni dialogues with policymakers, both directly and indirectly through trade associations. Eni actively contributes through its experience as an international energy company to the definition of strategies and regulations aimed at promoting the path towards Carbon Neutrality, an initiative discussed further in the [■ Transparency and Partnership](#) section. The decarbonization strategy is an integral part of Eni's overall business strategy and is also implemented through a structured Corporate Governance system, with the Board of Directors and CEO playing central roles in managing the main aspects related to climate change. The Board of Directors examines and approves the Strategic Plan on the CEO's proposal, which encompasses the four-year plan, medium-to long-term plan, industrial business targets, as well as financial results and sustainability objectives, including decarbonization objectives. In addition, the Sustainability and Scenarios Committee

(CSS) is the internal board committee that carries out investigative, advisory, and propositional functions related to processes, initiatives, and activities aimed at overseeing Eni's commitment to sustainable development throughout the value chain. For an overview of the topics discussed by the CSS during the year and other details on the role of the various governing bodies, please refer to the [► Governance](#) section. The effective implementation of Eni's corporate strategy is supported by its Remuneration Policy through incentive systems for Directors, General Managers, Executives with strategic responsibilities, and other Executive Managers<sup>29</sup>. These systems include: a) the Long-Term Share-based Incentive Plan, which incorporates specific objectives related to environmental sustainability and energy transition, (total weight of 35%), articulated on targets focused on decarbonization and energy transition processes (20% dedicated to reducing net upstream scope 1 and 2 equity GHG emissions and 15% towards increasing biojet fuel production capacity); b) the Short-Term Incentive Plan is also closely linked to Eni's strategic transformation objectives, including an environmental sustainability objective that focuses on the reduction of net upstream scope 1 and 2 equity GHG emissions, in line with the Long-Term Incentive Plan, 20% for the CEO and management, with weights defined based on their assigned responsibilities. For further details, please consult the [🔗 Report on the Remuneration Policy 2025 and compensation paid 2024](#). To support the monitoring and reporting of the decarbonization objectives incorporated in the Strategic Plan, Eni has developed specific procedures integrated into the **internal Regulatory System**. These procedures define, in line with the main international standards, the methods for emission reporting (for more information, please refer to the [■ Metrics](#) section). Finally, to support Eni's energy transition journey, the organisational structure continues to evolve together with the long-term strategy, while ensuring consistency with the corporate mission. The 2024 reorganization, which grouped business activities into three main structures, reflects this evolution: (i) Transition & Financial is responsible for the development and implementation of Eni's economic and financial strategy, including oversight of Plenitude and Enilive; (ii) Global Natural Resources manages the upstream Oil & Gas portfolio and oversees the development of CCS, and agri-hub businesses. In addition, it controls the Power Generation & Marketing business and the Trading activities; (iii) Industrial Transformation focuses on the acceleration of industrial transformation activities in the Chemical sector (Versalis), on the conversion of the traditional downstream operations (Refining), and progressing environmental remediation activities (Eni Rewind).

(28) For references to the Code of Ethics, see [■ The Regulatory system](#), while for the internal regulatory system, refer to the [■ Reporting principles and criteria/Policies](#).

(29) About 300 business-critical managerial resources.



## CLIMATE DUE DILIGENCE RECONCILIATION SCHEME

Eni's tools and practices related to climate change can be framed within the due diligence phases identified by the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023) and the OECD Due Diligence Guidelines (2018), as follows:

- 1. Integrating due diligence into governance, strategy and business model:** Eni expresses its commitment to combating climate change in its corporate mission and through various company policies, notably the Code of Ethics. Eni's decarbonization strategy aimed at achieving Carbon neutrality by 2050, is an integral part of the company's strategy and is implemented through a structured Corporate Governance system. The commitment to combat climate change is also embedded in the guidelines that steer management performance, through the remuneration policy. Finally, Eni promotes responsible conduct along the value chain and in advocacy activities, guided by core principles outlined in the Supplier Code of Conduct and in the Assessment of Industry Associations' Climate Policy Positions. For further information, please refer to [Policies and Climate Governance](#).
- 2. Identifying and assessing negative impacts:** Eni has adopted internal tools and processes to identify GHG emission sources. Based on this evaluation, Eni develops an inventory, reports emissions and establishes a priority order for their mitigation, also considering the broader climate debate. For further information, please refer to the [Impacts related to climate change](#) and [Metrics](#) sections.
- 3. Taking action to address negative impacts:** in order to contribute to the reduction of the Company's GHG emissions and its value chain, Eni has defined a path towards Carbon Neutrality by 2050. This includes a series of publicly announced targets with intermediate milestones that will progressively lead to achieving net zero for the indicators (i) Net GHG lifecycle emissions scope 1, 2 and 3 (ii) and Net Carbon Intensity associated with the life cycle of products energy sold. For details, please refer to [Decarbonization strategy](#). Furthermore, recognizing the value of a collective action in combating climate change, Eni promotes combined multisectoral and global actions. To this end, it collaborates with various stakeholders, including academia, civil society, institutions and businesses to identify and promote actions aimed at supporting the energy transition. For details, please refer to the paragraph [Partnership for Decarbonization](#).
- 4. Monitoring the effectiveness of interventions:** the monitoring of GHG emission reduction targets follows a structured process that encompasses strategic planning, the setting of objectives related to management remuneration and the biannual review of performance indicators to identify any gaps and adjust priorities for the next cycle (see [Metrics](#)).
- 5. Communicating:** Eni communicates comprehensive and transparent information on climate-related aspects in compliance with legal requirements for sustainability reporting, as well as in accordance with key voluntary guidelines and best practices for climate disclosure. In addition, Eni continuously monitors the evolution of both soft and hard law regulations on climate matters, assessing the robustness of its frameworks and making adjustments as needed. For details, please refer to the paragraph [Transparency in Disclosure](#).

## IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CLIMATE CHANGE

### Climate change-related impacts (inside-out view)

#### [DUE DILIGENCE PHASE 2]

The process undertaken by Eni to identify its climate change-related impacts has been guided by scientific<sup>(30)</sup> and regulatory references and guidelines<sup>(31)</sup>, which indicate that the GHG emission estimation

is the criterion for assessing the Company's negative impact. Aware of the need for a collective response to the global decarbonization challenge, Eni has long been committed to a path of GHG emission reduction towards Carbon Neutrality by 2050. Inspired by the recommendations of the main international standards and industry best practices<sup>(32)</sup>, Eni has implemented internal procedures to identify emission sources and methodologies for calculating direct and indirect GHG emissions, using a bottom-up approach that begins with the assessments at individual industrial sites and is subsequently consolidated at the central level. By mapping the

(30) The prevailing position of the scientific community identifies GHG emissions as the cause of climate change, while acknowledging that there is no linear relationship between GHG emissions and climate change impacts. See AR6 IPCC and, for example, Rial et al., 2004; Trudinger, and Enting, 2005; Millar et al., 2017.

(31) Such as, for example, what is indicated in the section "Disclosure requirement relating to ESRS 2 IRO-1", paragraph 20, subparagraph a) of ESRS E1.

(32) WBCSD/WRI GHG Protocol Initiative and IPIECA/API/IOPG Petroleum industry guideline for reporting greenhouse gas emissions 2011.



emissions associated with the activities of over 600 companies, in 64 Countries, Eni has created an inventory of both actual direct and indirect GHG emissions. To ensure a robust and structured data collection and control process, specific procedures and appropriate control measures have been implemented. The Group's emission impact is also assessed prospectively by estimating potential GHG emissions based on the Strategic Plan defined until 2050. For further details, please refer to the sections: [Metrics](#) and [Metrics and methodologies](#).

## PRIORITIZATION PROCESS OF EMISSION IMPACTS

Since the early 2000s, Eni has developed and maintained an emission inventory that contains information (with breakdown on geographical area, business, source type, etc) useful to identify priority areas of intervention, while considering key trends in the broader climate debate. For instance, decisions made in international forums (e.g. COP<sup>33</sup>), energy and climate scenarios and United Nations scientific reports, including those from IPCC, provide valuable guidance on the key decarbonization levers available (see [Scenarios of the main international organisations](#)). In particular, the external context analysis highlights a focus on reducing Scope 1-2 emissions, on addressing interventions where technological mitigation opportunities are achievable and on reducing methane emissions, a greenhouse gas with a global warming potential<sup>34</sup> higher than carbon dioxide and for which economically and technically feasible solutions are already in place. Based on this findings and its emission inventory analysis, Eni has set since 2015 a series of targets to improve GHG emissions performance of its assets, with a specific focus on methane and flaring. Over the years these targets have been continuously strengthened: the number of key indicators has increased and the targets have become more challenging and ambitious. Since 2020, Eni has defined a pathway and specific targets to achieve Carbon Neutrality by 2050, covering the entire life cycle of the energy products sold. For details, please refer to the [Decarbonization Strategy](#) section. The process of identifying, assessing and prioritizing emission impacts is reviewed and updated annually, with continuous refinement over the years, in line with the development of scientific evidence and growing international climate awareness.

## Climate risks and opportunities for the company (outside-in view)

Eni's double materiality analysis is completed with the identification and assessment of climate-related risks and opportunities. The risk assessment associated with climate change verifies the possibility of changes in the scenario/climatic conditions that may generate transition risks (market, regulatory and legal, technological, and reputational) and physical risks (acute and chronic) on Eni's businesses in the short, medium, and long term. The risks associated with the implementation of the planned strategic actions are also evaluated. The opportunities, on the other hand, refer to the potential of developing products and services with reduced emission impact and technologies aimed at mitigating and offsetting GHG emissions. The identification and assessment of these risks are incorporated into Eni's [Integrated Risk Management](#) Model, as described in the [Process and results of the double materiality assessment](#) section. The process ensures the detection, consolidation, and analysis of Eni risks and supports the Board of Directors in verifying the risk profile compatibility with the strategic objectives. Eni also monitors the evolution of the main risks and de-risking actions from a medium to long term perspective. Risks, including those related to climate change, are assessed by considering both the probability of occurrence and the potential effects on Eni's quantitative and qualitative objectives over a given time horizon when the risk is likely to occur. These risks are also represented on matrices for comparison and classification by relevance. On this scale, climate change is considered a top risk for Eni.

## SCENARIO ANALYSIS

The identification of Eni's transition and physical risks and climate opportunities is also supported by an in-depth analysis of the climate scenarios. In the international context, numerous analysts, organizations, energy companies, and sector consultants have developed multiple scenarios, each following different construction logic and outlining a possible evolution for the future energy system. These scenarios derive from a diversified mix of levers, technologies, and assumptions about how consumption patterns and policies may evolve. These pathways indicate a possible future direction and serve as a reference framework to better inform policy guidelines and choices. Eni analyzes different future pathways that incorporate a heterogeneous mix of solutions and objectives, with particular emphasis on the scenarios represented by the IEA and IPCC.

(33) For example, the decision (1/CMA.5) adopted during COP28 (2023) where progress towards achieving Paris Agreement goal was reviewed and measures, best practices and opportunities for Countries in revising their Nationally Determined Contribution (NDCs) were identified.

(34) It is the ability of a gas to persist in the atmosphere over a specific time period. For more details, see [Metrics: reference methodologies](#).



## SCENARIOS OF THE MAIN INTERNATIONAL ORGANIZATIONS

**The International Energy Agency (IEA)** elaborates three energy scenarios: (i) Stated Policies - STEPS, which is based on existing policies and predicts an expected temperature increase of 2.4°C by 2100 (50% probability); (ii) Announced Pledges - APS, which aligns with the net zero targets declared by individual Countries, expecting to achieve these targets within the announced timeframe, and forecast a temperature increase of 1.7°C by 2100 (probability of 50%); (iii) Net Zero Emissions - NZE, which imposes net zero emissions by 2050, aiming to limit the temperature increase to 1.5°C with limited overshoot<sup>35</sup> (50% probability). These forecasts are based on common assumptions about future demographic and economic trends, which are expected to grow at an average rate per year of +0.7% and +2.7%, respectively, between 2023 and 2050. Specifically, in the NZE scenario<sup>36</sup>, of which the IEA provides numerical details only on a global scale, the decarbonization of the energy system relies on increased electrification and a substantial rise in the use of intermittent renewable energy sources (increasing their share in electricity generation mix from the current 13% to about 75% by 2050). Achieving these goals will require improvements in energy efficiency, rapid technological evolution (CCUS, BECCS, and DACS), and a shift in consumption habits towards more sustainable standards. In terms of the energy mix, in the NZE scenario, there is a substantial reduction in the role of fossil fuels, which are projected to drop from nearly 80% of the world's energy mix today to just under 15% by 2050, against an energy demand decreasing by an average of -0.5% per year between 2023 and 2050. In this context, net CO<sub>2</sub> emissions from the energy sector – expected to be zero by 2050 – are projected to decline by 30% between 2019 and 2030. This decline is primarily due to the global reduction in coal use (the source with the greatest environmental impact), with CO<sub>2</sub> emissions related to coal expected to fall by 42% (compared to a projected consumption decrease of -40%), followed by oil (CO<sub>2</sub> emissions - 28% vs. a consumption decrease of -21%) and to a lesser extent by natural gas (CO<sub>2</sub> emissions -14%, vs. consumption drop of -15%). Overall, emissions from the Oil & Gas sector are anticipated to drop by approximately 23% between 2019-2030, together with an overall consumption decrease of 18% for these two sources.

**The IPCC (Intergovernmental Panel on Climate Change)**, in its latest report (AR6, 2021), proposes 5 possible narratives for the future development of the world's population and economy, known as SSPs (Shared Socioeconomic Pathways). When combined with the 7 GHG emission concentration pathways, also called RCPs<sup>37</sup> (Representative Concentration Pathways), these pathways help define various climate scenarios. The IPCC scenarios are grouped into 8 categories (C1-C8)<sup>38</sup>, based on the projected temperature increase by 2100 associated with each scenario.

In particular, category C1 comprises 97 scenarios that aim to limit the global average temperature increase to 1.5°C, either without or with a limited overshoot (reaching net-zero between 2030 to 2100, depending on the scenario) (probability >50%). The scenarios in this group are based on the sustainable SSP1<sup>39</sup> or the intermediate SSP2<sup>40</sup> development pathways and correspond to a low concentration of GHG emissions - RCP 1.9. These scenarios envisage various pathways for the decarbonization of the energy system, which, while adopting levers and technologies similar to those used by the IEA NZE scenario, propose different combinations. For example, in these pathways, electrification does not necessarily depend exclusively on renewable intermittent energy sources, but it can also be supported by an increasing use of nuclear power. Additionally, the median expected reduction in global primary energy from coal between 2019-2030 is approximately 75%, while declines for oil and gas are expected to be around 10%. On the other hand, category C8 includes 29 scenarios that predict a doubling of global GHG emissions compared to 2015 levels, leading to an increase in the global average temperature of more than 4°C. The group describes the potential rise in both the frequency and intensity of various acute and chronic weather and climate phenomena (e.g., heat waves, intense rainfall, glacier reductions, etc.). The underlying socioeconomic trend for these scenarios follows SSP5<sup>41</sup>, which is associated with a high concentration of GHG emissions - RCP 8.5.

(35) Overshoot refers to the temporary exceedance of a specified level of global warming, such as 1.5°C. This means that the global temperature peaks above this threshold before declining, achieved through anthropogenic removal of CO<sub>2</sub> that exceeds the remaining CO<sub>2</sub> emissions globally (source: IPCC glossary "Special Report: Global warming of 1.5°"). There are two types of overshoot: "limited", which indicates an exceedance of global warming over 1.5°C by about 0.1°C, and "high", which refers to an exceedance of about 0.1°C-0.3°C. In both cases, these exceedances occur over a period of several decades (source: "Climate Change Synthesis Report" IPCC, 2023).

(36) World Energy Outlook 2024.

(37) Representative Concentration Pathways (RCPs) are scenarios that encompass a time series of emissions and concentrations of all GHGs, aerosols and chemically active gases, as well as land use/land cover changes. The term "representative" indicates that each RCP illustrates only one of many possible scenarios that could lead to specific radiative forcing characteristics (W m<sup>-2</sup>). The term "pathway" emphasizes the importance not only of long-term concentration levels but also of the trajectory taken over time to achieve that those levels. (source: IPCC Glossary).

(38) The categories range from very low emissions (C1) to very high emissions (C8). Intermediate categories aim to limit global warming to different temperature thresholds: C2 aim for 1.5°C with a high overshoot; C3-C4 for 2°C; C5 for 2.5°C; C6 for 3°C; C7 for 4°C. (source: "Climate Change Synthesis Report" IPCC, 2023).

(39) SSP1, the "path of sustainability", is characterised by a high focus on sustainability, inclusive development, reduced economic and social inequalities, and environmental protection (source: IPCC Focal Point for Italy).

(40) SSP2, the "intermediate path", is represented by historical development models continuing throughout the twenty-first century (source: IPCC Focal Point for Italy).

(41) SSP5, the "rapid growth pathway", is characterised by rapid economic growth and an energy-intensive, fossil fuel-based economy, resulting in significant climate challenges (source: Climate Change Synthesis Report, IPCC and IPCC Focal Point for Italy).



## Transition risks

The context in which Eni operates is significantly influenced by global commitments to achieve carbon neutrality and evolving consumer preferences. These factors could lead to a structural decrease in hydrocarbon demand in the medium to long term and an increase in operating costs in the Oil & Gas sector. Uncertainties regarding demand trends and the feasibility/profitability of decarbonization technologies create risks around long-term investment decisions. In addition, the growing attention within the public debate on

climate change and the increasingly rigorous scrutiny from various stakeholders may hinder access to capital markets and potentially jeopardize the "license to operate" for oil and gas companies. For an in-depth analysis of the specific drivers or transition events (market, regulatory and legal, technological and reputational), please refer to the ► [Risk factors and uncertainties](#) section. A summary of the main risks identified by Eni in relation to these transition events is presented in the table below.

### MARKET EVOLUTION

- Uncertainty surrounding the development of markets for new products;
- Shifts in consumer preferences (e.g., decline in global hydrocarbon demand).

### REGULATORY AND LEGAL ISSUES

- Introduction of new climate disclosure obligations;
- Uncertainty about the evolution of regulatory frameworks, which could impact long-term strategies;
- Legal proceedings related to climate change and allegations of greenwashing.

### TECHNOLOGICAL EVOLUTION

- Profitability concerns and technology-specific risks associated with the transition;
- Delays in the development of essential technologies and related supply chains needed to meet decarbonization targets;
- Insufficient oversight of certain technologies that are critical for the transition.

### REPUTATION

- Deterioration of the sector's image due to allegations of greenwashing;
- Challenges in attracting and retaining talent within the industry;
- Decreased sector's appeal to investors/lenders, posing a potential risk of divestment.

Eni has outlined treatment measures (see ► [Integrated Risk Management](#)) to minimise risks associated with these emerging trends. Specifically, Eni assesses potential variables that may affect operating costs, such as carbon prices, and closely monitors the **resilience of its strategy** against various transition scenarios (see IEA NZE scenario, ► [Scenarios of the main international organizations](#)).

### INTERNAL CARBON PRICING

In 2024, Eni implemented an internal carbon pricing mechanism, also known as a shadow price, to assess its economic and

financial exposure to the potential introduction of carbon pricing systems in the Countries where it operates. The returns on key investment projects are evaluated for sensitivity to an internal carbon pricing value set at \$45/ton CO<sub>2</sub>eq. (in real terms, 2021). This value is adjusted annually for an inflation rate of 2%. Eni applies internal carbon pricing for projects developed in Countries without mandatory carbon pricing mechanisms<sup>42</sup>. The Board of Directors reviews the results during the preliminary authorization phase of individual investments (Final investment decision - FID) that fall within the thresholds established for Board review and subsequently during the annual monitoring of these projects.

(42) If the local legislation stipulates a carbon tax, this price is incorporated into the base case, and sensitivity analysis is not conducted.



## RESILIENCE OF THE STRATEGY TO TRANSITION SCENARIOS

The company's strategic planning and investment selection/monitoring processes aim to identify actions that maximise the value of the Group's assets by considering the risks and opportunities associated with the energy transition. In this context, action/spending plans are regularly defined to achieve short, medium, and long-term decarbonization objectives based on a set of base-case assumptions regarding the speed of the energy system transformation and the consequent repercussions on prices. Progress towards these targets is subject to systematic control and reporting. One of the tools utilized to assist management in understanding Eni's exposure to transition risk is a sensitivity analysis of the Oil & Gas asset values under alternative price scenarios compared to the base case. This analysis verifies the variability of asset values and the possible risk of distributing unrealized gains in stress scenarios, which include: (i) a linear cut of -10% in hydrocarbon prices across all years of cash flow projections; (ii) an increase of one percentage point in the discount rate (adjusted WACC) used for determining the net present values of assets in each Country of operation; (iii) assumptions regarding hydrocarbon prices and CO<sub>2</sub> costs based on projections from the IEA Net Zero Emission 2050 scenario<sup>43</sup> (NZE 2050). For further details

on the analysis and the respective results, refer to ► [Note 15 of the Consolidated Financial Statements](#).

## Physical Risks

The physical risks arising from climate change can be determined by individual (acute) events or long-term (chronic) changes in climate phenomena. These risks can have financial implications for companies, including direct damages to assets and indirect impacts due to the interruptions in operations and along the value chain. Such disruptions can lead to losses in results and cash flow, as well as increased restoration and maintenance costs and other effects on the supply chain. Eni has established a methodology to assess the exposure to physical risks of its owned assets<sup>44</sup> and the main third-party assets within its value chain, which, if unavailable, may cause repercussions on the operability of Eni's assets. To identify and assess adverse climate events and the evolution of physical risks, Eni uses the IPCC SSP5 - 8.5 scenarios, which represent extreme scenarios characterised by a temperature increase of more than 4°C by 2100 compared to pre-industrial levels (see IPCC category C8 ■ [Scenarios of the main international organizations](#)). The primary climate-related hazards considered by Eni are outlined in the table "classification of climate-related hazards"<sup>45</sup>. These hazards were identified based on their relevance to the type of assets Eni possesses.



### WATER

- Sea level rise
- Water stress
- Drought
- Heavy precipitation (rain, hail)
- Flood (coastal, fluvial, pluvial)



### WIND

- Cyclones
- Hurricanes
- Typhoons



### TEMPERATURE

- Wildfires



### SOLID MASS

- Landslide

Eni conducts a stress test exercise on its current portfolio of assets, focusing on the physical risks listed above over a long-term time horizon (20/30 years).

This assessment is carried out annually and is continuously refined to respond to future developments and enhance the accuracy of forecasting models.

(43) Scenario reported in the World Energy Outlook 2024, IEA-OECD.

(44) The geographical coordinates of Eni's assets are used to assess the quantitative metrics of the projections related to different natural events at Eni's sites.

(45) Commission Delegated Regulation EU 2021/2139 - Appendix A.



## ASSET RESILIENCE TO CLIMATE-RELATED PHYSICAL RISKS

Once the physical risks associated with Eni's assets (inherent risk) are defined, an assessment of the existing mitigations or barriers is conducted, considering both physical aspects and the systems or procedures in place. The residual risk is then assessed for each asset. In the cases where a high level of residual risk is identified, Eni implements various actions: (i) for chronic risks (e.g., water stress), monitoring activities are planned and carried out, which may lead to the subsequent development and execution of an intervention plan; (ii) for acute risks, the asset integrity<sup>46</sup> process is activated, which can result in the definition and implementation of an adaptation plan. From the physical risk analyses conducted in 2024 on Eni's production assets and the main assets within the value chain, it emerged that Eni's portfolio is substantially resilient to climate-related physical risks. The main reasons for the overall resilience of Eni's assets at the portfolio level are attributable to: (i) the intrinsic resilience of the assets themselves (already designed with stringent criteria to withstand extreme natural events) and (ii) the geographical diversification of the asset portfolio.

### Climate opportunities

While transition events can pose risks, they also offer opportunities that require rigorous capital allocation discipline and a well-structured strategic planning process. Opportunities are identified through the Strategic Plan, which selects those initiatives the company chooses to pursue. For further information on identifying and evaluating sustainability opportunities, including climate-related ones, refer to the [■ Process and results of the double materiality assessment](#). In order to seize these opportunities, Eni is integrating its business model with solutions related to the energy transition, such as the growth of renewable energy sources and EV networks through Plenitude and also advancing biorefining initiatives through Enilive (see chapter [► Enilive and Plenitude](#)). At the same time, the company is implementing solutions aimed at reducing both its own emissions and those of third parties, such as the development of CCUS projects (see chapter [► CCS and Agri](#)). In addition, Eni continues to invest in R&D and is focused on cutting-edge technologies such as magnetic fusion. To support the development of these opportunities, Eni has established a new corporate structure (see [■ Policies and Climate Governance](#)) and adopted a satellite model<sup>47</sup>. This model reduces the financial commitment required to grow new businesses while clarifying their market value.

## DECARBONIZATION STRATEGY [DUE DILIGENCE PHASE 3]

### Decarbonization Plan

Eni is facing the challenges posed by an increasingly complex and rapidly evolving energy context with a strategy aimed at progressively reducing both the direct and indirect emission impacts associated with its business activities, while providing the energy products required by its customers. This strategy combines the needs of (i) environmental sustainability; (ii) security of supply, ensuring the uninterrupted availability of sufficient energy resources to power human activities and guarantee basic human rights; (iii) energy equity, understood as the possibility for citizens to have fair and non-discriminatory access to adequate, reliable and affordable energy. In response to these challenges, Eni has been committed to reducing its direct GHG emissions and was among the first in the sector to establish a series of objectives, starting in 2016. These objectives aim to improve the GHG emissions performance of its operated assets. Since 2020, Eni has defined a pathway towards Carbon Neutrality, expressed through a series of objectives with intermediate stages that will progressively lead to the Net Zero by 2050 of the Net GHG lifecycle emissions scope 1, 2, and 3 and Net Carbon Intensity indicators, related to the lifecycle of the energy products sold. The stages of this pathway have been identified through a prioritization exercise of the different actions, based on both internal analyses and the proposed actions from major international scenarios aimed at achieving Carbon Neutrality by 2050 to help keep the global temperature rise within 1.5°C by 2100. Even within comparative limits, the structure of this pathway, in terms of levers and emission reduction targets, is substantially compatible with these scenarios. For further information, see IPCC category C1 and IEA NZE scenarios, in the [■ Scenarios of the main international organizations](#), [■ Main GHG emission reduction targets](#), and [■ Decarbonization levers sections](#). As part of the reduction of Scope 1 and 2 GHG emissions, Eni has decided to focus primarily on the Upstream sector, where technologically consolidated and economically viable solutions are already available. Emissions that are not currently reducible are voluntarily offset through high-quality<sup>48</sup> carbon credits. Eni has set a goal of net zero Scope 1 and 2 GHG emissions for the Upstream sector by 2030 (Net Zero Carbon Footprint Upstream), and for the entire Eni group by 2035 (Net Zero Carbon Footprint Eni). Additionally, Eni has a goal of net zero Scope 1, 2, and 3 GHG emissions, related to the lifecycle of energy products sold by 2050, both in absolute terms

(46) Eni applies the asset integrity process to all its assets to ensure the proper design and construction using suitable materials, rigorous operational standards, and appropriate decommissioning practices. This process also manages residual risks while ensuring people's safety, protecting the environment, and safeguarding the company's reputation.

(47) See page Eni.com [Eni's satellite model: a distinctive approach](#).

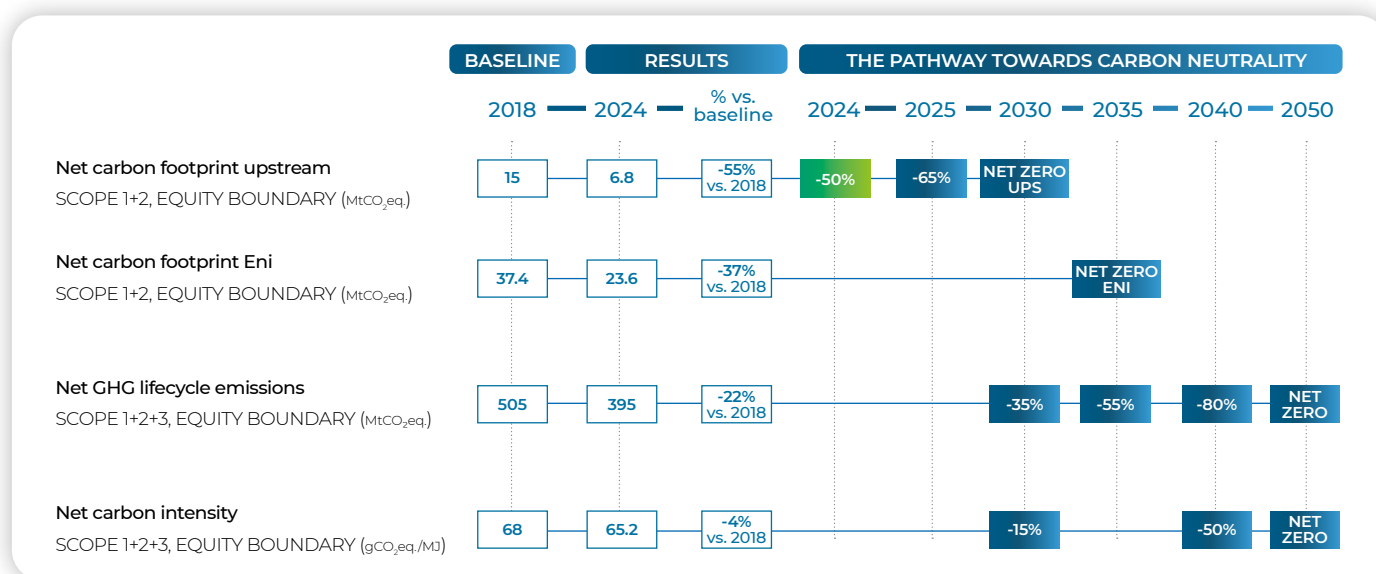
(48) Certified according to internationally recognized voluntary market standards, which are accompanied by additional certifications to attest to the socio-environmental benefits of the project activities (see [■ Offsets and removals of GHG emissions](#) section).

(Net Zero GHG Lifecycle Emissions) and in terms of intensity (Net Zero Carbon Intensity)<sup>49</sup>. Eni's decarbonization strategy, which includes the commitments to reduce emissions mainly related to the use of sold products, also contributes to promoting the decarbonization of the value chain (reducing Scope 3 emissions). Eni seeks to develop new, high-potential businesses related to the energy transition by creating independent companies able to access the capital market with autonomy, allowing them to finance their growth by attracting specialized investors.

## MAIN GHG EMISSION REDUCTION TARGETS

In continuity with previously declared commitments and considering the evolving regulatory environment, Eni has chosen to represent

its pathway towards Carbon Neutrality through targets based on indicators defined on an equity-basis<sup>50</sup>. The Lifecycle indicators (Net GHG Lifecycle Emissions and Net Carbon Intensity) are calculated using a methodology developed in 2020 in collaboration with independent experts, which considers all energy products sold, including purchases from third parties, and all the emissions they generate along the entire supply chain. This methodology is inspired by international reporting standards (GHG Protocol<sup>51</sup>, IPIECA<sup>52</sup>). Regarding its targets, Eni estimates both the annual reduction in GHG emissions compared to the 2018 baseline defined by the company and the projected future reductions in light of the targets set in its Decarbonization Plan (see the [Metrics](#) section of this chapter and the [Reporting principles and criteria](#) section in the final chapter).



**NET CARBON FOOTPRINT UPSTREAM, Scope 1+2:** represents the Scope 1+2 GHG emissions related to the upstream activities operated by Eni or by third parties accounted for on an equity basis and net of carbon credits mainly generated through Natural Climate Solutions and the application of technological solutions. In 2024, the indicator decreased by about 25% compared to 2023, driven mainly by optimization actions in operational management and project activities to generate carbon credits. Additionally, in 2024, the target of achieving -50% compared to 2018 was exceeded, with an overall reduction of about 55%. The pathway is in line with the achievement of Eni's net zero Carbon Footprint goal by 2030.

**NET CARBON FOOTPRINT ENI, Scope 1+2:** represents the Scope 1+2 GHG emissions associated with the activities operated by Eni or third parties accounted for on an equity basis and net of carbon credits mainly generated by Natural Climate Solutions and the application of technological solutions. In 2024, the indicator decreased by about 10% compared to 2023, driven mainly by optimization actions in operational

management and project activities to generate carbon credits. Compared to 2018, the indicator decreased by about 37% in line with the achievement of Eni's net zero Carbon Footprint target by 2035.

**NET GHG LIFECYCLE EMISSIONS, Scope 1+2+3:** represents the Scope 1+2+3 GHG emissions associated with the supply chain of energy products sold by Eni, including its own production and purchases from third parties, accounted for on an equity basis and net of carbon credits from Natural Climate Solutions and the application of technological solutions. In 2024, the indicator is slightly down (-0.8%) compared to 2023, mainly driven by the refining sector. Compared to the baseline value, emissions were reduced by about 22%.

**NET CARBON INTENSITY, Scope 1+2+3:** the indicator is calculated as the ratio between Net GHG Lifecycle Emissions and the energy content of energy products sold by Eni, accounted for on an equity basis. In 2024, the indicator has slightly decreased (approx. 0.5%) thanks to the lower emission impact of the portfolio mix. Compared to the baseline value, the index has reduced by about 4%.

(49) All net-zero GHG targets are calculated on an equity basis.

(50) The targets are defined on an equity basis and, therefore, have a different boundary from that defined by the reporting required by CSRD-ESRS. For more details on the reconciliation of boundaries, please refer to the [Metrics](#) section.

(51) WBCSD/WRI GHG Protocol Initiative, A Corporate Accounting and Reporting Standard.

(52) Estimating petroleum industry value chain (Scope 3) greenhouse gas emissions. Overview of methodologies, IPIECA - 2016.



## DECARBONIZATION LEVERS

The decarbonization levers and technologies identified by Eni in its Decarbonization Plan affect all areas of its business. These strategies are adopted and modulated in a targeted manner, with time horizons considering each solution's technological and commercial maturity. Between 2018 and 2024, Eni implemented actions that, on the one hand, led to a reduction in Scope 1+2 emissions from its operations, focusing primarily on flaring, methane emissions, and energy efficiency interventions (see sections [Targets for the reduction of methane emissions and flaring in the Upstream business](#) and [Energy consumption and energy mix](#)) in order to reduce fossil fuels consumption. On the other hand, these actions also contributed to a reduction in emissions along the value chain (Scope 3), particularly by leveraging synergies between traditional activities and transition-related businesses, along with portfolio actions that reduce the volume of gas procured via pipeline. Eni has also launched a process to enhance the value of its transition businesses, promoting solutions aimed at reducing the carbon intensity of the products and services, with a focus on renewable electricity production (through Plenitude, which in 2024 reached 4.1GW of installed renewable capacity, recording an annual growth rate of more than 30%). Additionally, Eni is involved in biofuel production (through Enilive, which has a biorefining capacity of 1.65 MTPA and benefits from its international presence) and CO<sub>2</sub> capture and storage (CCS) services for third parties. Moving forward, Eni has outlined future initiatives aimed at reducing Net GHG Lifecycle Emissions Scope 1+2+3 emissions as part of its pathway towards achieving Carbon Neutrality:

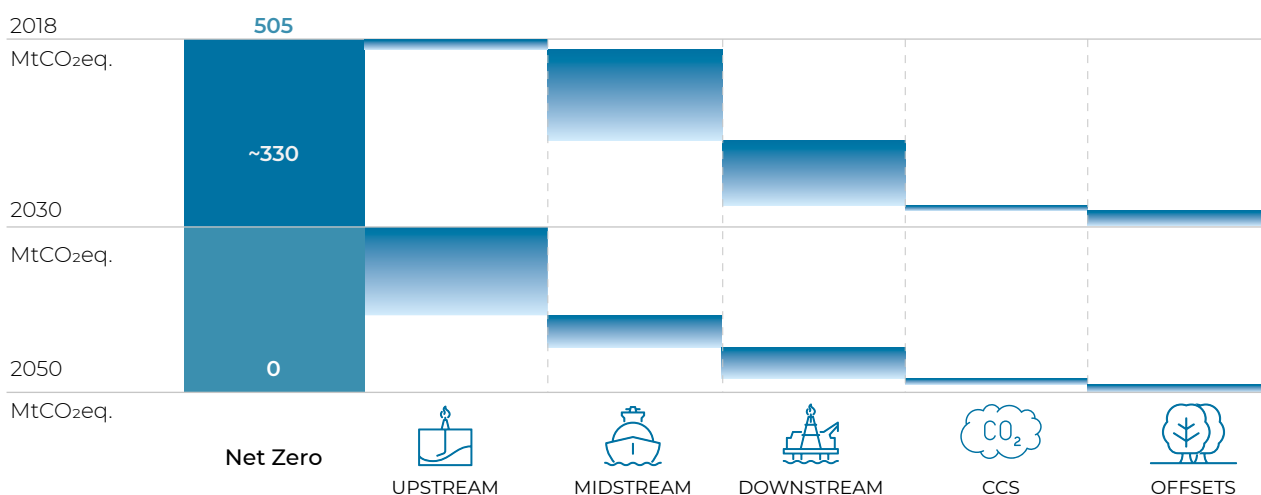
- in the **Downstream**, the development of biofuels offers an opportunity for Eni to convert and downsize its current traditional refining capacity, contributing significantly to the decarbonization of hard-to-abate transportation, i.e., aviation, maritime transport, and heavy transport. Following the conversions of Porto Marghera

(2014) and Gela (2019), Eni started the conversion at the Livorno site in 2024. Eni has a biofuel production capacity target of more than 5 million tons by 2030 and the optionality to produce more than 2 million tons of SAF;

- enhanced integration between **Upstream and Midstream** enables a focus on LNG equity projects within the gas portfolio, benefiting the company in terms of emissions. Improved efficiency and the progressive growth of the total production's gas component (over 60% by 2030 and 90% after 2040), including condensates, contain the increase in emissions from upstream production;
- **CCS** is a decarbonization lever that represents an opportunity for Eni to reduce emissions from its own operations and support the decarbonization of third-party industrial activities. In 2024, Ravenna's Phase 1 was launched, while the approval process for the Hynet project in the United Kingdom is ongoing, with an expected approval date in the first half of 2025. Additionally, in 2025, Eni will establish a new satellite company focused on carbon capture and storage. The estimated total 100% storage capacity (gross capacity) is about 3 billion tons, with the aim of reaching a gross annual CO<sub>2</sub> reinjection capacity of over 15 MTPA before 2030. This capacity is projected to increase to about 40 MTPA after 2030 and to exceed 60 MTPA by 2050. For more information (see chapter [CCS and Agri](#));

- finally, to offset residual emissions, Eni plans to utilize **offsets** mainly from Natural Climate Solutions (NCS). By 2050, the target year for achieving Net Zero, residual emissions are expected to be around 25 MtCO<sub>2</sub>eq., remaining below the 10% threshold set by the ESRs standards (see section [Offsets and removals of GHG emissions](#)). Regarding the contribution of the Intensity, Eni is committed to expanding its offering of **lower carbon solutions**, such as **renewable energy**, to increase the production of new energy options. This effort, combined with a gradual reduction in absolute emissions, will lead to a decrease in the emission intensity of its portfolio (see the [Metrics](#)

### MAIN DECARBONIZATION LEVERS



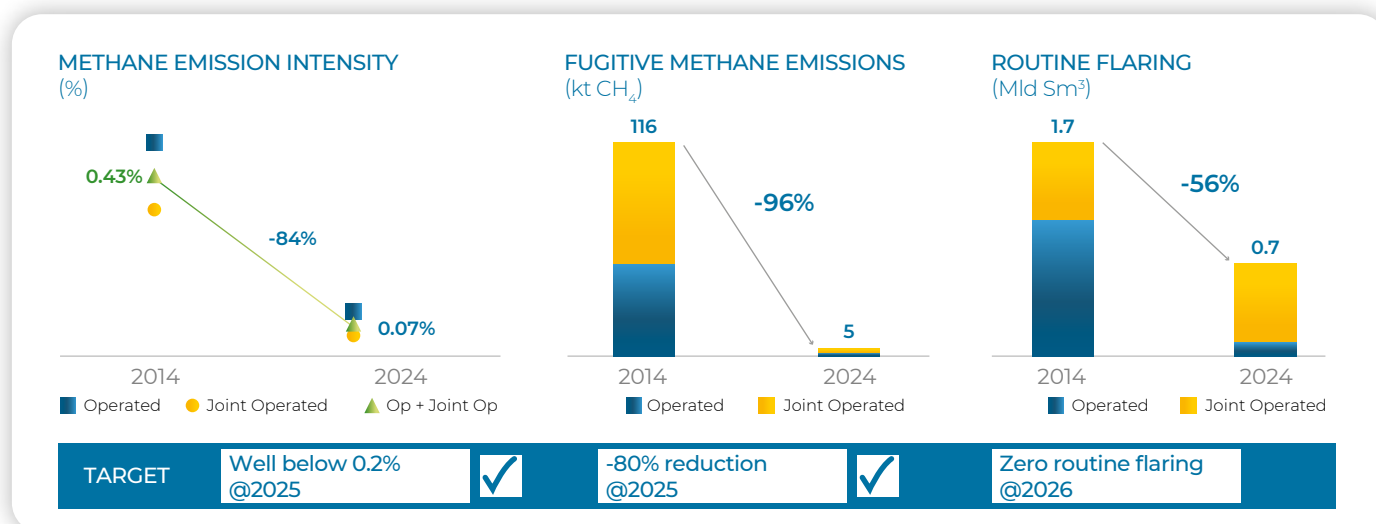


section of this chapter). The speed of this transformation and the relative contribution of each lever will depend on a series of variables, including market trends, the scientific-technological scenario, and the applicable legislation.

### TARGETS FOR THE REDUCTION OF METHANE EMISSIONS AND FLARING IN THE UPSTREAM BUSINESS (OPERATED AND COOPERATED ASSETS)

Actions to reduce methane emissions and flaring are a fundamental part of Eni's decarbonization strategy and contribute significantly to the reduction of direct Scope 1 emissions. With an approach primarily focused on the Upstream sector, Eni has set a target to maintain methane emission intensity within the threshold of 0.2% by 2025. This threshold is recognized by the sector as indicative of effective operational management, while aiming for methane emissions to be close to zero<sup>53</sup>. Eni has also joined the Aiming For Zero initiative, launched by OGCI, which seeks to eliminate methane emissions from its members' assets by 2030. The company has set a target of reducing fugitive methane emissions by 80% by 2025 (compared to 2014 - the base year). This goal was already achieved in 2019 through the implementation of LDAR (Leak Detection and Repair<sup>54</sup>) campaigns carried out annually on the assets managed by Eni.

Additionally, Eni has progressively implemented a monitoring system to measure the extent of methane emissions across its assets (for activities supporting our partners, see the [■ Partnership for Decarbonization](#) section). Eni has developed at its sites various methodologies and technological solutions to identify, quantify, and ultimately **reduce methane emissions**. The LDAR campaigns cover all assets managed by Eni and are carried out annually, also through optical technologies. Eni has been recognized as a Gold Standard Reporting under the Oil & Gas Methane Partnership (OGMP 2.0) program, as reported in the 2024 International Methane Emissions Observatory (IMEO) Report, published by UNEP. Furthermore, in recent years, Eni has dedicated an increasing effort to identifying and implementing initiatives to **mitigate gas flaring**. Notable projects are underway in Congo, Libya, and Egypt, where significant logistical, operational, and market barriers have previously limited the valorisation of associated gas. In this context, Eni is advancing towards the goal of zero routine flaring for its operated assets expected in 2025. For its joint-operated assets, the achievement of the target is contingent upon the completion of the projects in Libya, which are currently expected by 2026. Finally, a key component of Eni's methane strategy is a collaboration with other industry players and international organisations (see the [■ Partnerships for Decarbonization](#) section of this chapter).



### LOCKED-IN EMISSIONS ASSESSMENT

Locked-in emissions refer to the estimated GHG emissions from assets and operations deemed incompatible with a low-carbon future. If such a scenario arises during the useful life of a company's assets, it could lead to a write-down of the most emission-intensive assets. Eni monitors its potential locked-in emissions from key assets and projects, maintaining a medium to long-term perspective through its strategic plan and tracking progress towards carbon neutrality. In the Upstream sector, Eni adopts an approach that considers both the economic value

and emission intensity of its assets. Priority is given to investments in resource production and exploration of areas that are adjacent to existing assets/infrastructures. Eni will continue to pursue exploration with a model based on organic growth, dilution of equity investments in high-potential discoveries, reduced time to market, and enhancement of margins from equity production. This analysis also evaluates the potential emission intensity associated with reserves to ensure production remains aligned with medium and long-term emission reduction targets. In the Downstream sector, Eni aims to improve the

(53) The OGDC (O&G Decarbonization Charter - COP 28 UAE) "Near-Zero methane" commitment is defined as methane emission intensity of less than 0.2%.

(54) Monitoring and detection of methane leaks and subsequent repair.



efficiency of its operations and integrate lower carbon products into its offering, also through the conversion of traditional refining capacity. Additionally, Eni assesses the resilience of its portfolio to mitigate the risks of stranded assets and applies internal carbon pricing to ensure that new investments are consistent with decarbonization targets. For further details, refer to the [Transition risks](#) section.

## CAPITAL ALLOCATION

Eni recognizes the need to ensure an orderly transition in the energy system by gradually replacing fossil fuels with lower carbon energy sources. This evolution towards a lower carbon product portfolio will be supported by a progressive growth in the share of investments intended to develop new energy solutions and services to support the transition. In the medium to long term, Eni plans to gradually reduce the share of expenditures dedicated to Oil & Gas activities, with the gradual phase-out of investments in carbon-intensive activities or products. For 2024 investments related to the exploration, development, and production

of hydrocarbons, see [Note 12 "Property, plant and equipment"](#) of the Consolidated Financial Statements<sup>55</sup>. The expenditure on lower carbon projects for 2024 was €2.6 billion (over 20% of expenditures). Additionally, for a reclassification of these amounts according to the more stringent criteria defined by the European regulation, refer to the [European Taxonomy](#) section. Over the next four-year period 2025-2028, Eni plans to allocate more than 30% of its total spending, approximately €13 billion, to lower carbon projects. Below it is represented a breakdown of the resources planned for various decarbonization actions in support of the Decarbonization Plan.

Over 40% of the planned spending for 2025-28 is aligned with the EU Taxonomy. In comparison to this regulation, the expenditure forecast for 2028 includes additional factors such as interventions carried out in joint ventures, expenses that contribute to emission reductions (e.g., energy efficiency initiatives and routine flaring abatement), and expenditures that support the development of the Plenitude customer base.

## EXPENDITURES<sup>(a)</sup>

|   | Units of measurement | 2024       | 2025-28   |
|---|----------------------|------------|-----------|
| <b>Total value</b>  | (billion €)          | <b>2.6</b> | <b>13</b> |
| Electricity production from renewable sources   |                      | 1.0        | 4.1       |
| GHG emissions reduction   |                      | 0.4        | 2.5       |
| Biorefineries and biofeedstock  |                      | 0.5        | 2.8       |
| Retail portfolio development  |                      | 0.3        | 1.2       |
| Research by Lower Carbon activity   |                      | 0.1        | 0.8       |
| Circular Economy and Other initiatives (inc. recycling, bio chemistry, NCS and Venture Capital) |                      | 0.3        | 1.6       |

(a) The items in the table are included in the Notes to Eni's 2024 consolidated financial statements, in the items in [Note 14 "Intangible assets"](#) and in [Note 30 "Costs-Purchases, services and other charges"](#).

## PATENTS AND INNOVATION

Innovation is an integral part of Eni's Code of Ethics, with a commitment to acquiring cutting-edge technological skills. In particular, innovation is strongly linked to climate aspects and, for the 2025-2028 period, the company has set the target of allocating 70% of R&D spending to decarbonization related aspects. For 2024, Eni's financial commitment to scientific research and technological development amounts to €178 million, of which approximately €145

million is allocated to reducing the carbon footprint of processes, circular economy, the renewable energy exploitation and magnetic confinement fusion. This expenditure includes, in particular, topics related to biorefining, chemistry and energy production from renewable sources (including biomass), energy storage, capture, transport, storage and reuse of CO<sub>2</sub>, as well as, process carbon footprint reduction, and green hydrogen production.

## RESEARCH & DEVELOPMENT

|  | Units of measurement | 2024 | 2023 |
|--|----------------------|------|------|
| R&D expenditures <sup>(a)</sup>                      | (M€)                 | 178  | 166  |
| <i>of which: related to decarbonization</i>          |                      | 145  | 135  |
| Patent application first filings                     | (number)             | 39   | 28   |
| <i>of which: related to renewable energy sources</i> |                      | 23   | 14   |

(a) The items in the table are included in the Notes to Eni's 2024 consolidated financial statements, in the item in [Note 14 "Intangible assets"](#).

(55) The company is excluded from EU benchmarks as per Article 12, paragraph (1), letter (e) to (g) and paragraph (2) of Commission Delegated Regulation (EU) 2020/1818.



## OFFSETS AND REMOVALS OF GHG EMISSIONS

Eni supports the development of projects aimed at generating carbon credits in the voluntary market for offsetting residual GHG emissions that cannot otherwise be reduced, while monitoring their quality and integrity. In line with ESRS standards, Eni intends to use carbon credits to achieve its Net Zero target by 2050 for Net GHG lifecycle emissions and Net carbon intensity (Scope 1+2+3), after reducing 90-95% of GHG emissions in the value chain. Currently, most of the carbon credits used by Eni derive from projects for the conservation of natural ecosystems, thereby reducing CO<sub>2</sub> emissions that would otherwise be released into the atmosphere. Eni's strategy foresees to progressively increase the share of credits from the so-called Carbon Dioxide Removal (CDR) projects, which capture CO<sub>2</sub> directly from the atmosphere (e.g. ecosystem restoration or increase of CO<sub>2</sub> stocks in the soil through appropriate agricultural practices). The carbon credits used by Eni are certified according to internationally recognized voluntary market standards, such as the Verra's Verified Carbon Standard (VCS) or the Gold Standard (GS). In addition, the credits are accompanied by an additional certification, such as the Climate Community & Biodiversity Standards (CCBS) or the Sustainable Development Verified Impact Standard (SD VSta) which attests to their socio-environmental benefits (e.g. biodiversity conservation, economic development and improvement of local communities living conditions). In 2019, Eni launched the first **Natural Climate Solutions** (NCS) activities<sup>56</sup>. These projects aimed at the protection, sustainable management of land and restoration of natural ecosystems. These initiatives preserve habitats in which plants and animals live, increase the resilience and adaptive capacities of environmental systems to climate change, and promote

local sustainable development. The first projects promoted by Eni were framed within the "Reducing Emissions from Deforestation and forest Degradation" (REDD+) scheme, defined and promoted by the United Nations. In addition to these, Eni expanded its initiatives to promote Sustainable Agriculture and Land Management (SALM)<sup>57</sup>. In this context, Eni has launched a first project in Kenya, the Makueni Agroforestry Carbon Project (MACP), which will be developed over a target area of 40,000 hectares, will bring socio-economic benefits (e.g. stabilization of farmers' income) to about 100,000 local people and will contribute to reducing soil erosion and improving the productivity and fertility of agricultural lands. The application of **technological solutions** represents an additional lever for offsetting residual emissions. Since 2018, the company has launched the "Eni for Clean Cooking" program to develop projects that promote the introduction of improved cooking stoves that reduce of the consumption of wood biomass with the aim of improving people's health conditions and promoting forest conservation<sup>58</sup>. The programme has been launched in Congo, Mozambique, Angola, Rwanda, Tanzania and Ivory Coast reaching around 1.5 million people since the start of the initiatives<sup>59</sup>. The industrial spread of clean cooking systems also promote the development of entrepreneurship and the local economy (i.e. stove production and distribution). In 2024, Eni joined the "Clean Cooking Declaration: Making 2024 the pivotal year for Clean Cooking", promoted by the IEA during the Africa Summit, to accelerate universal access to more modern cooking systems. In addition to the described project development activity, Plenitude acquires carbon credits mainly through purchases on the voluntary market, in line with the same certification standards used by Eni. Details of the carbon credits<sup>60</sup> retired in 2024 and those expected in the future<sup>61</sup> are provided below.

## RETIRED CARBON CREDITS

|   | Units of Measurement    | 2024               |
|---|-------------------------|--------------------|
| <b>Total</b>  | (MtCO <sub>2</sub> eq.) | 5.9 <sup>(a)</sup> |
| Reduction credits   | (%)                     | 100                |
| Removal credits   |                         | 0                  |
| <i>of which: biogenic removal</i>   |                         | 0                  |
| <i>of which: technological removal</i>                                    |                         | 0                  |
| Credits verified according to the VERRA standard                          |                         | 100                |
| Credits from projects in the EU   |                         | 0                  |
| Credits subject to corresponding adjustment according to Art.6 of the PA. |                         | 0                  |

(a) Credits that derive from projects supported by Eni SpA and which were retired in February, 2025. In addition, in 2024, Plenitude purchased 3.1 MtCO<sub>2</sub>eq. (verified by Gold Standard and Verra), associated with the supply of offset gas, of which: (i) 0.3 MtCO<sub>2</sub>eq. representing the difference between the estimated and final carbon credits of the fourth quarter of 2023 and retired in October 2024; (ii) 2.8 MtCO<sub>2</sub>eq. which represent the estimated purchase of carbon credits for 2024, which will be finalized during 2025. Of these, 1.8 MtCO<sub>2</sub>eq., linked to gas consumption invoiced from January to September 2024, were offset in February 2025. The remaining estimated 1 MtCO<sub>2</sub>eq., relating to gas consumption invoiced from October to December 2024, will instead be offset by October 2025. The aforementioned credits are used to offset emissions for the Net Carbon Footprint Scope 1+2 (Eni/UPS) and Net GHG Lifecycle Scope 1+2+3 indicators.

## EXPECTED CARBON CREDITS

|              | Units of Measurement  | 2030 | 2040 | 2050 |
|--------------|-----------------------|------|------|------|
| <b>Total</b> | MtCO <sub>2</sub> eq. | ~15  | ~20  | <25  |

(56) Natural Climate Solutions are nature-based solutions for climate change. They rely on nature's ability to remove and store carbon from the atmosphere (Source: Natural Climate Solutions Alliance, NCSA, 2022).

(57) Within the SALM category, actions include the use of agricultural practices that increase the organic carbon component in the soil and the integration of tree species into agricultural crops.

(58) In addition, the Eni for Clean Cooking program involves the gradual transition to induction stoves in urban areas and pyrolysis in rural areas, promoting the use of agricultural waste.

(59) Expansion to other Countries in Sub-Saharan Africa and Asia is also under evaluation.

(60) This means the action of cancelling or voiding carbon credits in the electronic register that contains them, so that these credits can no longer be transferred or used for emissions offsetting (i.e. no double counting).

(61) Only a portion of the receivables expected to be retired in the target years derives from contractual agreements already in place today.



## METRICS<sup>62</sup>

### [DUE DILIGENCE PHASE 2 AND 4]

### GHG Metrics (Scope 1, 2 and 3)

Eni reports its GHG emissions in accordance with the main international standards and industry best practices. In line with ESRS requirements, Scope 1 and Scope 2 emissions are reported by including subsidiaries (consolidated on a line-by-line basis) in the consolidation boundary and, as a share, both consolidated joint operations (incorporated and unincorporated) and activities relating to mining initiatives managed by operating companies. In addition, for the assets operated, emissions

are reported at 100%. Scope 3 emissions are reported, in line with the classification provided by the GHG Protocol and according to the methodological standards available in the sector following significance criteria and including emissions associated with the value chain of Eni's activities. In addition to the metrics described above, Eni reports emissions for a series of additional ("Entity Specific") indicators used to track operating performance and progress towards Carbon Neutrality by 2050. For more details on the reporting methodologies adopted, the materiality analysis of emission sources and other management aspects related to greenhouse gas accounting, please refer to the dedicated section (see [Metrics: methodologies](#)).

### GHG SCOPE EMISSIONS 1 AND 2

|  | Units of measurement    | 2024         |                                      | 2023          |                                      | Trend 2024 vs. 2023 <sup>(c)</sup> |
|--|-------------------------|--------------|--------------------------------------|---------------|--------------------------------------|------------------------------------|
|  |                         | Total (ESRS) | of which consolidated <sup>(a)</sup> | Totale (ESRS) | of which consolidated <sup>(a)</sup> |                                    |
| Scope 1 GHG emissions  |                         |              |                                      |               |                                      |                                    |
| Direct Scope 1 GHG emissions   | (MtCO <sub>2</sub> eq.) | 31.1         | 27.4                                 | 32.3          | 27.9                                 | -4%                                |
| <i>of which: CO<sub>2</sub> equivalent from combustion and process</i>             |                         | 25.3         | 22.9                                 | 26.5          | 23.5                                 | -5%                                |
| <i>of which: CO<sub>2</sub> equivalent from flaring</i>                            |                         | 3.6          | 2.5                                  | 3.9           | 2.7                                  | -8%                                |
| <i>of which: CO<sub>2</sub> equivalent from venting</i>                            |                         | 2            | 1.9                                  | 1.7           | 1.6                                  | 17%                                |
| <i>of which: CO<sub>2</sub> equivalent from methane fugitive emissions</i>         |                         | 0.2          | 0.1                                  | 0.2           | 0.2                                  | -9%                                |
| Percentage of Scope 1 GHG emissions covered by regulated emissions trading systems | (%)                     | 58           | -                                    | 57            | -                                    | 1%                                 |
| Scope 2 GHG emissions  |                         |              |                                      |               |                                      |                                    |
| Scope 2 location-based GHG emissions <sup>(b)</sup>                                | (MtCO <sub>2</sub> eq.) | 0.8          | 0.7                                  | 0.7           | 0.7                                  | 5%                                 |
| Scope 2 market-based GHG emissions <sup>(b)</sup>                                  |                         | 0.9          | 0.9                                  | 0.9           | 0.9                                  | -6%                                |

(a) The value, shown in this column, refers to consolidated companies, as required by the ESRS standards (E1-6 50a). The difference between the total value, calculated according to the ESRS methodology, and the consolidated companies refers to the non-consolidated operated activities (as required by the ESRS E1-6 requirement 50b). In 2024, non-consolidated Scope 1 GHG emissions operated amounted to 3,6 MtCO<sub>2</sub>eq.

(b) The non-consolidated location-based and market-based operated GHG Scope 2 emissions are equal to 0.03 MtCO<sub>2</sub>eq. (as required by the requirement of ESRS E1-6 50b).

(c) The trends and total values reported in the table were calculated using a greater number of decimal places, which are not reported in the table.

### GHG EMISSIONS SCOPE 3 AND OTHER INDICATORS

|  | Units of measurement       | 2024  | 2023  | Trend <sup>(d)</sup> |
|--|----------------------------|-------|-------|----------------------|
| <b>Relevant Scope 3 GHG emissions</b>                    |                            |       |       |                      |
| Category 11. Use of sold products <sup>(a)</sup>         | (MtCO <sub>2</sub> eq.)    | 181.0 | 173.7 | 4%                   |
| <b>Total GHG emissions</b>                               |                            |       |       |                      |
| Total location-based GHG emissions                       |                            | 212.8 | 206.8 | 3%                   |
| Total market-based GHG emissions                         |                            | 212.9 | 207.0 | 3%                   |
| <b>Entity Specific indicators - Equity</b>               |                            |       |       |                      |
| Net Carbon Footprint upstream (Scope 1+2)                |                            | 6.8   | 9.0   | -25%                 |
| Net Carbon Footprint Eni (Scope 1+2)                     |                            | 23.6  | 26.2  | -10%                 |
| Net GHG Lifecycle Emissions (Scope 1+2+3) <sup>(b)</sup> |                            | 395   | 398   | -1%                  |
| Net Carbon Intensity (Scope 1+2+3) <sup>(b)</sup>        | (gCO <sub>2</sub> eq./MJ)  | 65.2  | 65.6  | -1%                  |
| <b>Entity Specific Indicators - 100% Operated</b>        |                            |       |       |                      |
| Direct Scope 1 GHG emissions <sup>(c)</sup>              | (MtCO <sub>2</sub> eq.)    | 21.2  | 22.7  | -6%                  |
| Location-based Scope 2 indirect GHG emissions            |                            | 0.6   | 0.6   | +4%                  |
| Eni direct methane emissions (Scope 1)                   | (kt CH <sub>4</sub> )      | 16.0  | 16.6  | -3%                  |
| of which: upstream fugitives                             |                            | 1.7   | 2.0   | -15%                 |
| Upstream methane emission intensity                      | (%)                        | 0.09  | 0.10  | -10%                 |
| Volumes of hydrocarbons sent to flaring                  | (billion Sm <sup>3</sup> ) | 0.84  | 0.89  | -6%                  |
| of which: routine Upstream                               |                            | 0.12  | 0.24  | -51%                 |

(a) Category 11 of the GHG Protocol - Corporate Value Chain (Scope 3) Standard. Estimated based on upstream production sold as Eni's share in line with IPIECA methodologies. The emissions of consolidated companies alone amount to 137.2 MtCO<sub>2</sub>eq. in 2024.

(b) GHG emissions associated with the life cycle of energy products sold by Eni. For more information, see [Metrics: methodology](#).

(c) The indicator refers to consolidated activities carried out (i.e. share of emissions from consolidated companies, as required by the reference of the ESRS E1-6 50a standards) as well as to non-consolidated but operated activities. Unlike the total ESRS indicator, emissions relating to consolidated non-operated companies are therefore excluded. For segment views, see [Operating review](#).

(d) The trends reported in the table were calculated using a greater number of decimal places, which are not reported in the table.

(62) For the methodology and consolidation area, see the chapter [Reporting principles and criteria](#).



According to the new method of presenting data with the boundary required by the CSRD, Scope 1 emissions amount to 31.1 MtCO<sub>2</sub>eq., a decrease of approximately 4% compared to 2023, mainly in the Exploration and Production sector (decrease linked to asset disposals in Nigeria and Congo and the implementation of gas valorisation projects in Congo), and in the refining sector due to plant restructuring and maintenance. It should be noted that out of the consolidated total amount (27.4 MtCO<sub>2</sub>eq.), 9.8 MtCO<sub>2</sub>eq. (i.e. 36%) do not relate to assets operated by Eni. Scope 2 emissions increased slightly under location-based view, while they decreased in market-based view as a result of the increased

use of renewable energy guarantees (mainly in Versalis). Scope 3 emissions from category 11 (use of sold products) amount to 181 MtCO<sub>2</sub>eq. in 2024 and show a slight increase (+4%) in line with the increase of sold Upstream hydrocarbon production. Eni's Net Lifecycle Scope 1, 2 and 3 emissions (395 MtCO<sub>2</sub>eq.) are slightly reduced compared to 2023; the reduction compared to 2018 (base year) amounts to approximately 110 MtCO<sub>2</sub>eq. (-22%). Furthermore, considering the contribution in 2024 from the commercialization of LNG, renewable electricity and biofuels in terms of potentially avoided emissions<sup>63</sup>, a saving of about 13 MtCO<sub>2</sub>eq.<sup>64</sup> would be achieved.

**9,1**

**MtCO<sub>2</sub>eq. of GHG emissions potentially avoided through Eni's LNG sales in 2024, assuming that gas replaces more emissive fossil fuels (oil, coal) in the power generation phase**

**1,9**

**MtCO<sub>2</sub>eq. of GHG emissions potentially avoided by selling Eni's renewable electricity in 2024, assuming that it replaced emissions associated with the average electricity mix in the Country of generation**

**2,0**

**MtCO<sub>2</sub>eq. of GHG emissions potentially avoided by selling Eni's biofuel production in 2024, considering an emission saving of about 80% compared to the average fossil fuel benchmark**

### Reconciliation between the boundary of "Entity Specific" indicators and CSRD metrics

Eni's progress towards carbon neutrality by 2050 is monitored through a series of indicators reported on the equity boundary, which differs from the metrics shown in the table according to the CSRD boundary. Specifically:

- The Net Carbon Footprint Equity (Scope 1+2) indicators, compared to the CSRD indicators, also include the contribution of non-operated and non-consolidated JV/Associates, accounted on an equity basis; on the other hand, for all the companies consolidated on a line-by-line basis, as well as for the other companies operated by Eni, the data are accounted on an equity basis, in proportion to the shareholding or revenue interest.
- The Net GHG Lifecycle Emissions indicator (Scope 1+2+3), compared to the CSRD metrics, is built on an equity-based view and considers a broader boundary for Scope 3 emissions that also includes energy products purchased by third parties (e.g. natural gas produced by third parties and sold by Eni). The indicator can be reconciled with CSRD data by changing emissions 1-2 as described above (excluding the contribution of the chemical sector) and subtracting the Scope 3 emission from mid-downstream businesses (excluding carbon credits used to offset these emissions).

(63) Avoided emissions are emissions that would have been released if a particular action or intervention had not taken place; some emissions can be avoided by using a more efficient and/or less carbon intensive product or service (e.g. by using renewable energy instead of fossil fuels - see WBCSD, 2023) resulting in lower third-party emissions.

(64) 1) LNG: ~9.1 MtCO<sub>2</sub>eq. - In calculating the emission savings, the shares of gas destined for the power sector in the Countries of sale were considered. For all the fossil fuels analyzed (coal, oil and LNG) reference is made to the emissions of the electricity generation phase only. Elaboration based on IEA (Energy Balance 2024, Emission Factors 2021) and Enerdata data. 2) Renewables: 1.9 MtCO<sub>2</sub>eq. - The representative emission factors used were processed based on IEA (Emission Factors 2024) data. 3) Biofuels: 2.0 MtCO<sub>2</sub>eq. - The average emission savings have been calculated as the ratio between the emissions associated with the quantities of HVO biofuels sold in 2024 and reported in the sustainability certificates and the value of the fossil fuel reference defined in the RED III directive (equal to 94 gCO<sub>2</sub>eq./MJ). The contribution of production from the Chalmette biorefinery in Louisiana is not included in the calculation.



## Energy consumption and energy mix<sup>65</sup>

The energy efficiency measures carried out during the year allow for effective primary energy savings compared to baseline consumption of over 308 ktoe/year deriving mainly from upstream projects (over 82%), with a benefit in terms of emission reduction of approximately 778 thousand tonnes of CO<sub>2</sub>eq. If Scope 2 emissions, i.e. emissions from purchased electricity and thermal energy, are also considered, the net CO<sub>2</sub> savings deriving from energy saving projects rise to about

816 thousand tons of CO<sub>2</sub>eq. In 2024, Eni's total energy consumption (equal to 92.7 million MWh) recorded a reduction of 3% compared to 2023 due to the contraction in fossil energy consumption, in particular due to the drop in natural gas consumption linked to the sale of Nigerian Agip Oil Co Ltd. Renewable energy consumption (amounting to 587,259 MWh) recorded an increase of 62% compared to 2023 due to the increase in electricity purchases covered by guarantees of origin and the increase in biomass energy consumption.

### ENERGY CONSUMPTION MIX

|   | Units of<br>measurement | 2024       |                              | 2023<br>Operated |
|---|-------------------------|------------|------------------------------|------------------|
|   |                         | Operated   | Consolidated not<br>operated |                  |
| Total energy consumption  | (MWh)                   | 92,738,602 | 32,150,544                   | 95,227,735       |
| Total fossil energy consumption   |                         | 92,151,343 | 32,077,325                   | 94,865,743       |
| Fuel consumption from crude oil and petroleum products  |                         | 22,658,539 |                              | 21,435,813       |
| Fuel consumption from natural gas   |                         | 67,054,303 |                              | 71,165,300       |
| Fuel consumption from other fossil resources 38d  |                         | 331,591    |                              | 194,506          |
| Consumption of electricity, heat, steam and cooling acquired or purchased from fossil sources   |                         | 2,106,910  |                              | 2,070,123        |
| Total renewable energy consumption  |                         | 587,259    | 73,219                       | 361,992          |
| Fuel consumption from renewable sources, including biomass (also including industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) |                         | 355,385    |                              | 336,017          |
| Consumption of electricity, heat, steam and cooling acquired or purchased from renewable resources  |                         | 215,999    |                              | 9,750            |
| Non-combustible, self-generated renewable energy consumption  |                         | 15,875     |                              | 16,225           |

### ENERGY PRODUCTION

|  | Units of<br>measurement | 2024       | 2023       |
|--|-------------------------|------------|------------|
| <b>Entity Specific Indicators - Equity</b>                 |                         |            |            |
| Renewable Installed capacity                               | (MW)                    | 3,851      | 3,056      |
| Capacity of biorefineries                                  | (million tonnes/year)   | 1.65       | 1.65       |
| Sold production of biofuels                                | (thousand tons)         | 982        | 635        |
| Production of energy from renewable sources <sup>(a)</sup> | (GWh)                   | 4,665      | 3,984      |
| <b>Indicators - Operated</b>                               |                         |            |            |
| Production of non-renewable energy                         | (MWh)                   | 28,240,065 | 32,591,215 |

(a) The figure refers to Plenitude.

(65) The 2023 data relating to consolidated companies not operated by Eni (but by third parties) are not presented because, in the past, the data were aggregated with a different methodology and therefore would not be comparable.

## TRANSPARENCY AND PARTNERSHIP

### Transparency in Disclosure

#### [DUE DILIGENCE PHASE 5]

Eni communicates climate-related information in line with legal sustainability disclosures requirements, while also aligning with the main voluntary guidelines and best practices for climate disclosure, including the OECD Guidelines and TCFD, respectively for the inside-out and outside-in perspective. Eni supports the definition of best practices for complete and effective climate disclosure. An example is Eni's participation in the Oil & Gas Methane Partnership (OGMP 2.0), for which it was recognized as Gold Standard Reporting in 2024, as stated in the 2024 International Methane Emissions Observatory (IMEO) Report published by UNEP. This recognition underlines the effectiveness of Eni's decarbonization strategy in measuring methane emissions with the aim of reducing and mitigating them. In 2024, Eni conducted a large-scale global methane measurement campaign, overseen by a dedicated multidisciplinary task force, with strong support from all Eni geographical areas, joint venture companies and partners. As part of its commitment to continuous improvement in transparency, in 2024 Eni expanded its disclosure on methane emission reduction efforts by publishing a dedicated report for the first time. Transparent climate-related reporting, together with the Company's strategy, has contributed to positive evaluations from the main ESG rating agencies and climate benchmarks (see [ESG rating, Capital Market Update](#)). Through its advocacy activities, Eni shares its positioning on climate change and related climate strategy issues (see [Business Conduct](#)).

### Partnerships for Decarbonization

#### [DUE DILIGENCE PHASE 3]

Eni has long been engaged in collaboration and dialogue with the academic world, civil society, institutions and companies to promote

the energy transition by generating new knowledge, sharing best practices and fostering initiatives that create value for both the company and its stakeholders. Eni is a founding member of UNEP's Oil & Gas Methane Partnership (OGMP), the Oil and Gas Climate Initiative (OGCI) and the Methane Guiding Principles (MGP) and actively participates in expert groups, such as IPIECA and IOGP. In addition, Eni is a signatory of the Oil & Gas Decarbonization Charter (OGDC)<sup>66</sup>, a key initiative launched at COP28 with the aim of converging the sector towards transparent and concrete actions to reduce emissions, including methane and flaring. In support of its commitments, Eni has joined the Global Flaring and Methane Reduction (GFMR) trust fund, an initiative launched by the World Bank, aimed at helping governments and national operators eliminate methane emissions and routine gas flaring by 2030. For more details see the [Methane Report \(2024\)](#). These collaborations have contributed to the development of best practices for methane emissions monitoring, reporting and verification, and have promoted the adoption of new technologies for monitoring and reducing emissions across the industry, for example through the Climate Investment funded by OGCI. Eni has also signed collaboration agreements with national oil companies (NOCs) and joint venture partners, including EGAS, Sonatrach and SOCAR, with the aim of sharing its expertise in managing and reducing methane emissions. Eni also forms partnerships with energy-intensive companies to develop and promote lower carbon solutions. In this context, Eni has joined the "Pact for the Decarbonization of Air Transport" (PACTA), an initiative promoted together with Aeroporti di Roma that brings together representatives of institutions, industry stakeholders, trade associations and the third sector with the aim of defining a roadmap for the decarbonization of the air transport sector by 2050. Finally, Eni develops innovative solutions together with universities and start-ups, such as magnetic confinement fusion, an energy source that could revolutionize the energy sector through lower-emission technologies.

(66) At COP 28, over 50 companies joined the OGDC, of which about 30, for the first time, committed to achieve Net Zero by 2050 for Scope 1 and 2 GHG emissions, achieve the Near Zero methane emissions and zero routine gas flaring by 2030, as well as the commitment to report on the reductions achieved.



# Environment and Eni's management system

Eni pays particular attention to the efficient use of natural resources, such as water, the reduction of polluting emissions, waste management, the protection of biodiversity and ecosystem services. Environmental matters, along with **Health and Safety** topics, are managed with a single integrated HSE management system, which defines roles, responsibilities and methods of managing the activities of all sectors for environmental aspects. In addition, to train employees and the supply chain on these aspects, Eni is continuing a program, launched in 2019, to raise awareness and strengthen environmental culture involving all the group. The plan involved the operating sites in Italy and is being extended to foreign subsidiaries, also with the signing of the environmental and safety Pacts, which involve suppliers in tangible and measurable improvement actions. In addition, in 2024, Eni continued to promote the Environmental Golden Rules, to support the adoption of virtuous behaviour by employees and suppliers, in line with its values, commitment and standards.

## HSE management system

For environment, health and safety management in the workplace, Eni has adopted a model considering three levels of responsibility (employers, top management of the business area and Eni's top management), each of which is supported by a specific HSE function. In order to ensure control over activities, Eni, also for the purpose of preventing crimes pursuant to Legislative Decree 231/2001, has prepared an adequate control model for the HSE topics, consistent with the structure and organizational levels and with the system of delegations and responsibilities assigned. In line with the ISO 14001:2015 certification, as part of the Management System, the individual site carries out, in relation to its activities, a process of identification of environmental aspects with the assessment of potential impacts and associated risks, as well as the identification and monitoring of possible opportunities. The assessment process considers the asset lifecycle and activities under different operating conditions (normal, abnormal and emergency). The risk<sup>67</sup> associated with each environmental aspect/impact is assessed on the basis of risk mitigation barriers, both technical and managerial, developed on site. The impact and risk assessment process is periodic, monitored and updated in order to ensure and improve the quality and effectiveness of the risk identification, analysis and assessment process, as well as to periodically verify the consistency and adequacy and effectiveness of the measures developed. The regulatory system establishes the allocation of all Eni subsidiaries into three

HSE risk clusters, based on the activities carried out: (i) significant (industrial activities), for which there is an obligation to adopt an HSE management system, a certification according to ISO 14001 and ISO 45001 standards and to undergo annual HSE internal audits; (ii) limited (office activities or activities of limited importance), for which there is an obligation to adopt (but not to certify) an HSE management system and to undergo annual or five-yearly HSE internal audits; (iii) absent (absence of employees and operational activities), for which no specific obligations are foreseen; all companies at significant risk are covered by ISO 45001 and ISO 14001 certification or have planned to achieve it (at the end of 2024, 86% have already obtained ISO 45001 certification and 84% ISO 14001), as well as all other limited risk companies with the obligation to develop an HSE management system have already implemented it (86% in 2024) or have planned to implement it. In addition to third-party audits aiming at maintaining certifications, additional internal audits are carried out on an interim basis to verify the adequacy of the HSE Management System and to verify regulatory compliance. In the implementation phase of the operational activities, the objective is to manage, reduce and eliminate risks and direct/indirect impacts identified on the environment, both related to the specific activities of the production units/organizational structures, or related to the different processes of design, development, use and end of life of products and services, taking into account the various phases of the life cycle. In this phase, it is also ensured that appropriate methods are adopted for the selection and management of suppliers, contractors and subcontractors in compliance with Eni's HSE regulations, providing requirements and controls for the entire process, during the qualification phase and during the execution of the contract. Environmental impact assessment procedures are shared with local stakeholders in public consultations, where required by current legislation, and in some cases, also on a voluntary basis. In fact, inclusiveness and stakeholder engagement is one of the principles of reference for Eni, in order to promote preventive, free and informed consultations, considering their requests on development activities, projects and initiatives. In general, the needs and expectations of stakeholders are assessed by Eni sites within the context analysis according to the ISO 14001:2015 standard and the management of complaints is ensured through the Grievance Mechanism and the whistleblowing process (see **Human Rights for Eni**). Monitoring, including through HSE review<sup>68</sup>, and reporting are of strategic importance in keeping the organizational system efficient, supporting the decision-making process and identifying areas for

(67) In this context, the word "risk" is not related to the financial materiality but refers to the combination of the probability that a given event will occur in a given period or under specific circumstances and the consequences that may be generated.

(68) The HSE Review is aimed at assessing the management of HSE risks and verifying the suitability, adequacy and effectiveness of the HSE management system adopted.

improvement and actions to be implemented to achieve the defined objectives. The analysis carried out on the information at the site level makes it possible to identify the most critical situations and to plan any specific interventions with relative priorities. For the implementation of environmental activities, every year, Eni's strategic plan defines the financial resources to achieve the identified commitments, as well as to maintain the HSE management system. For the next four years, Eni has allocated resources amounting to €5.6 billion, particularly for soil and groundwater remediation activities (€2.3 billion), waste recovery, treatment and disposal (€1.1 billion), flaring down (€0.9 billion), sustainable water resources management (€0.6 billion), pollutant reduction, air monitoring and analysis (€0.2 billion), energy saving interventions (€0.1 billion), spill prevention interventions and improvement of containment systems (€0.2 billion), monitoring interventions, reduction of impacts on ecosystems and biodiversity and environmental restoration (€0.1 billion).

## POLLUTION

### POLICIES<sup>69</sup>

Eni's commitment to respecting the environment is expressed within [Code of Ethics](#), which delves into the values and principles that guide acting in a sustainable way, minimizing environmental impacts and optimizing the use of energy and natural resources. In addition, Eni has a **internal regulatory framework** for the mitigation of impacts/risks for the environment and for the organization, relating to: (i) management of the water cycle and minimization, control and monitoring of water discharges; (ii) prevention, control and monitoring of pollutant emissions; (iii) prevention and monitoring of spills; (iv) contamination of soil, subsoil and surface and groundwater and related emergency safety and remediation actions; (v) emergency management. The results of the assessments carried out to identify environmental aspects and the related impacts/risks allow for the identification of prevention, protection and mitigation measures, to safeguarding of the environment from the release of any pollutants through effective and periodically verified monitoring and control mechanisms.

### TARGETS AND COMMITMENTS

Although quantitative targets have not been identified, Eni is constantly committed to implementing actions aimed at safeguarding water resources, air quality and soils through an approach aimed at preventing and minimizing the risks and impacts of emissions in these environmental matrices. Eni adopts an **internal regulatory framework** and a [HSE Management System](#) that guarantees the definition of operational guidelines for all businesses, based on the knowledge of the context in which it operates, the identification of legislative obligations, environmental compliance and the expectations of stakeholders. Furthermore, Eni guarantees the monitoring of the

[actions](#) on a half-yearly basis through the analysis of [metrics](#) for the timely control of performance and rapid intervention in cases of misalignment with expected trends. Eni operates in compliance with the legislative requirements also through HSE management systems certified according to international standards. In line with what has been defined for water resources, the adoption of quantitative targets relating to pollution is under evaluation for the next strategic plans. It should be noted that the commitment defined in terms of water positivity ([Water Resources](#)), in line with the Net Positive Water Impact approach that inspires Eni, also intrinsically considers the dimension of water quality and therefore can also achieve objectives of water pollution reduction.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROs)

The material pollution impacts and risks are related to the potential release of substances into the air, water or soil associated with Eni's industrial activities in the fields of research, development and production of hydrocarbons, refining and transport of fuels and other flammable products, petrochemical production and potential malfunctions in water treatment systems in remediation activities. Despite Eni operating in compliance with national and local regulations and is being subject to controls by the competent authorities, these activities are inherently exposed to operational risks that may lead to impacts on the environment and Eni's people, as well as contractors, suppliers and business partners and local communities. These risks, although effective preventive systems and good management practices are adopted, can lead to process incidents, such as fires or explosions or asset integrity accidents, as well as to other non-process related risks (such as in the context of road, rail, ship, refuelling stations, gas distribution networks) or the occurrence of an uncontrolled flow of hydrocarbons from within the well (see [Risk factors and uncertainties](#)). Atmospheric emissions for the Oil & Gas sector are at the origin of environmental impacts, such as air quality, olfactory nuisances, photochemical smog, and the phenomenon of acid rain (acidification). Most of the emissions, mainly related to the processes of upstream industrial plants and electricity, chemical and refining plants, concern nitrogen oxides (NO<sub>x</sub>) and sulphur oxides (SO<sub>x</sub>), particulate matter (PM) and non-methane volatile organic compounds (NMVOCs). The same activities are at the origin of impacts related to water discharges for which Eni carefully monitors the presence of hydrocarbons in upstream production water and industrial wastewater. Regarding soil releases, Eni's activities do not involve operational discharges: however, oil and other chemicals releases are caused by accidental contamination losses, mainly associated with upstream and refining activities, or illicit acts (theft and sabotage). In addition, in order to ensure operational management that complies with

(69) For further references, see [The Regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).



advanced environmental protection criteria and the adoption of international standards and solutions and best practices, Eni has adopted a multi-level responsibility model and an internal regulatory system (see the chapter **Health & Safety**) which includes, among other things, the adoption of management systems certified according to ISO 14001 and ISO 50001 standards (as well as ISO 45001 for health and safety issues) by sites with higher HSE risk. The technical audit plan and the internal control system adopted to prevent and minimize operational risks allow constant verification of the sites' activities with respect to Eni's regulatory principles.

## ACTIONS TAKEN ON MATERIAL IROs

In all the various geographical contexts where it operates, Eni is committed to reducing and minimizing the impacts of its activities through the adoption of international good practices and Best Available Technology (BAT)<sup>70</sup>, both technical and managerial. Among these, the attention, in the various operational sites, is certainly focused on the efficient use of natural resources as well as the prevention/reduction/control of pollutant discharges into water, the minimization of polluting emissions into the atmosphere, the reduction of oil spills and the monitoring of the mitigation actions' effectiveness.

## Emissions of pollutants into the atmosphere

Eni has adopted an operating model that ensures, in addition to regulatory compliance, an approach aimed at preventing and reducing the risks associated with air pollution that these emissions may cause and the potential effects on local air quality. To this end, Eni defines and implements a systematic continuous monitoring and control plan at site level considering the territorial and environmental context and any requirements deriving from local laws and/or specific emission authorizations, to ensure the best performance in terms of minimizing releases into the atmosphere. Additionally, the application of the best technologies from a technical, operational and management point of view is promoted throughout the entire life cycle of the plants, starting from the design, aiming at environmental protection. In all industrial activities, Eni pays particular attention to the potential effects on the atmosphere and odour impact and, in order to promote the constant improvement of environmental performance, these aspects are continuously monitored through direct monitoring and control of individual emission sources. The industrial plants operate in line with the standards and requirements set out by the environmental authorizations and with the fundamental principles of prevention, protection and mitigation of environmental impacts, orienting their actions towards a continuous improvement of environmental performance and with a view to overall sustainability. In particular, within the EU, the activities subject to the Industrial Emissions

Directive (IED) also operate to ensure compliance with the provisions of the Monitoring and Control Plan and in line with the application of the BAT specifications on emissions into the atmosphere in relation to the different types (channelled, diffused, fugitive and odorous).

## Release of pollutant in wastewater

Similar prevention, monitoring and control measures are constantly adopted, in line with the management of emissions from water discharges, to safeguard not only the use of the resource but also the quality of the water environment. Both the implementation and the operational phases of the projects are carried out in compliance with the applicable regulations and the requirements dictated by local authorizations, which may require the engagement of local stakeholders. Eni has adopted precise internal standards to be used when local mandatory regulations are less strict, or absent, regarding environmental conservation, based on applicable international standards, and in consideration of the assessment of impacts on water quality. Eni monitors its water discharges after any treatment and the quantitative of oil in the produced water discharged. Internal early warning thresholds for specific pollutants in water discharged from each production activity are also adopted to promptly initiate any necessary corrective actions.

## Oil spill

The operation of Eni's assets does not involve operational releases to the ground, consequently the potential contamination can only come from accidental releases, such as operational spills and oil or chemical break-ins. Eni is constantly engaged in the management of risks and emergencies related to these events, through prevention, preparedness, mitigation, response and recovery activities. As part of prevention, the e-vpms<sup>71</sup> (Eni Vibroacoustic Pipeline Monitoring System) system for remote monitoring of any spills from pipelines, is present on all operating pipelines in Italy and is subject to technological updates, also in order to detect interference with third parties and to prevent break-ins. During 2024, for example, maintenance was carried out on the e-vpms<sup>®</sup> system in Val d'Agri, together with the technological update for the weather monitoring and warning system for the control of hydrogeological risks and for the management of water runoffs. To identify potential spills in progress, Eni has continued to invest in its proprietary e-siam<sup>®</sup> (Eni Structural Integrity Acoustic Monitoring) technology to detect and identify corrosion and leaks from tanks and pipes and has conducted tests to further develop this technology. Regarding mitigation, during the year, the methodology for assessing the risks deriving from natural events that may involve pipelines was standardized and the subsidiaries were supported in the preventive assessment of the best response actions, in the event of hypothetical offshore spills, also in line with industry

(70) By way of reference, the documents issued by the European Commission (BREF-BAT reference document) are taken into account.

(71) The technology is designed and developed by Eni to carry out real-time analysis and monitoring activities on new or existing pipelines, both for the transport of hydrocarbons and water, through an innovative system of vibroacoustic waves that detect external acts, such as attempted break-ins or accidental impacts on the pipelines, and variations in flow, maximizing the efficiency of the transport systems.

standards and local regulations. Eni's commitment to verify, monitor, and replace onshore and offshore pipelines continues to ensure asset integrity and prevent potential oil spills, with campaigns underway to replace the most critical sections. In particular, regarding onshore assets in Nigeria that have been subject to sabotage activities in recent years, with effects on various aspects of the business, Eni has developed and intensified over time a strategy aimed at avoiding accidents and mitigating their potential effects. This strategy was

carried out until the sale of the company, which was completed in 2024. This approach was based on the rapid identification of losses, damage and illegal activities along the transport lines, with the aim of taking timely action to reduce or avoid them. Finally, to strengthen the response capacity to marine pollution as a result of possible oil spills, Eni continues to participate in sector programs by joining regional initiatives also in collaboration with the International Maritime Organization.

## EXPENDITURES<sup>(a)</sup>

|   | Units of measurement | 2024                 | 2023  |
|---|----------------------|----------------------|-------|
| Air protection expenditures and investment <sup>(b)</sup> | (M€)                 | 45.84 <sup>(c)</sup> | 63.42 |
| of which: current costs                                   |                      | 38.58                | 34.45 |
| of which: investments                                     |                      | 7.25                 | 28.97 |
| Spill prevention expenditures and investments             |                      | 42.30                | 42.36 |
| of which: current costs                                   |                      | 12.89                | 9.90  |
| of which: investments                                     |                      | 29.41                | 32.46 |

(a) The items in the table are included in Eni's 2024 consolidated financial statements, in the item in ► [Note 14 "Intangible assets"](#) and in ► [Note 30 "Costs - Purchases, services and other charges"](#).

(b) For investments relating to discharge monitoring activities, see the ► [Water Resources](#) chapter. The total expenses are calculated using decimals which are not shown in the table.

(c) The downward trend is attributable to a high value that occurred in 2023 against specific projects at some sites.

## METRICS<sup>72</sup>

### Pollution and oil spill

In line with previous reporting, the emissions of the NO<sub>x</sub>, SO<sub>x</sub>, NMVOC and PM parameters are shown below, which account for the set of pollutants in the atmosphere considered relevant for Eni's business deriving from combustion processes and operations carried out. Similarly, the following tables show the

hydrocarbons in wastewater, a relevant parameter for Eni's business, potentially deriving from the hydrocarbon production and treatment processes and subsequent downstream chain. Below is represented the reporting on oil spills in terms of number and volumes spilled.

### EMISSIONS OF POLLUTANTS INTO THE ATMOSPHERE

|  | Units of measurement                    | 2024     |                           | 2023     |
|--|---|----------|---------------------------|----------|
|  |   | Operated | Consolidated not operated | Operated |
| NO <sub>x</sub> (nitrogen oxides) emissions              | (thousands of tons NO <sub>2</sub> eq.) | 21.9     | 10.7                      | 22.8     |
| SO <sub>x</sub> (sulphur oxides) emissions               | (thousands of tons SO <sub>2</sub> eq.) | 2.4      | 7.3                       | 3.1      |
| NMVOC (Non Methane Volatile Organic Compounds) Emissions | (thousands of tons)                     | 9.1      | 4                         | 9.6      |
| PM (Particulate matter) emissions                        |   | 0.5      | 0.4                       | 0.6      |

### POLLUTANTS IN WASTEWATER

|                            | Units of measurement | 2024     |                           | 2023     |
|----------------------------|----------------------|----------|---------------------------|----------|
|                            |                      | Operated | Consolidated not operated | Operated |
| Hydrocarbons in wastewater | (tons)               | 106.4    | 58.7                      | 110.7    |

(72) For the methodology and scope of consolidation, see the chapter Eni's ► [Reporting Principles and Criteria](#). The 2023 data relating to consolidated companies not operated by Eni (but by third parties) are not presented because, in the past, the data were aggregated with a different methodology and therefore would not be comparable. It is emphasized that in the comments on the performances the percentages are calculated using other decimal figures not presented in the document.



## OIL SPILLS

|  | Units of measurement | 2024     |                           | 2023     |
|--|----------------------|----------|---------------------------|----------|
|  |                      | Operated | Consolidated not operated | Operated |
| Operational oil spills (>1 barrel)   | (number)             | 18       | 5                         | 16       |
| <i>of which: upstream</i>  |                      | 7        | 5                         | 9        |
| Operational oil spills volumes (>1 barrel)                                     | (barrels)            | 675      | 175                       | 7,625    |
| <i>of which: upstream</i>  |                      | 25       | 175                       | 40       |
| Oil spills due to sabotage (including thefts) (>1 barrel)                      | (number)             | 95       | 5                         | 373      |
| <i>of which: upstream</i>  |                      | 94       | 5                         | 372      |
| Volumes of oil spills due to sabotage (including theft) (>1 barrel)            | (barrels)            | 2,140    | 770                       | 5,094    |
| <i>of which: upstream</i>  |                      | 2,138    | 770                       | 5,092    |
| Volumes of oil spills due to sabotage (including theft) in Nigeria (>1 barrel) |                      | 2,138    | 720                       | 5,092    |
| Chemical spill   | (number)             | 8        | 1                         | 16       |
| Volumes of chemical spills   | (barrels)            | 70       | 33                        | 2,260    |

**Emissions of pollutants into the atmosphere** show a decreasing trend. The decrease in SO<sub>x</sub> emissions (-21% compared to 2023) is mainly linked to the reduction in the contribution of the Sannazzaro and Livorno refineries for plant shutdowns in the period and that of the Venice biorefinery where, at the end of 2023, a sulfur recovery plant was put into service, characterized by a higher abatement efficiency than the previous one. In addition to the shutdowns of the Sannazzaro and Livorno refineries, the reduction in NO<sub>x</sub> (-4% compared to 2023), PM (-14% compared to 2023) and NMVOC emissions (-6% compared to 2023) was influenced by the release from the upstream portfolio of Nigerian Agip Oil Co Ltd and the Eni US Operating Co Inc activities in Alaska. In 2024, the volumes spilled as a result of operating **oil spills** (equal to 675 barrels) recorded a significant decrease compared to 2023 (in which, following a single event at the Sannazzaro refinery, there was a heavy fuel oil spill of over 7,547 barrels, fully recovered) with significant reductions in upstream both for the sale of the company in Nigeria and for the better performance recorded in Congo; the most important event occurred in Italy (440 barrels at the Taranto refinery, spill entirely recovered). Events recorded abroad accounted for 5% of the total quantities spilled, confirming a downward trend (-5% vs. 2023) with only two Countries impacted (the United Kingdom and Germany). Overall, 92% of the 2024 operating oil spill volumes were recovered. Oil spills from sabotage, amounting to 2,140 barrels, recorded a 58% reduction compared to 2023, with a significant drop in the number of events (95 vs. 373 in 2023). All the events (with the exception of one that occurred along the Sannazzaro-Rho pipeline for a total of 2 barrels) took place in Nigeria. The largest spill was 258 barrels,

of which 252 were recovered. Overall, 86% of oil spill volumes from sabotage have been recovered. The volumes spilled as a result of chemical spills (70 barrels in total) have decreased compared to 2023 and are essentially due to a single event in UK (69 barrels of methanol spilled during loading/unloading operations from storage tanks due to power outages).

The total hydrocarbon content in the **discharged water** was approximately 106 tonnes, down compared to 2023 due to a lower contribution from the E&P sector, mainly as a result of the decommissioning activities in Eni UK and the aforementioned sale of activities in Alaska.

### Other pollutants listed in Regulation 166/2006 (E-PRTR)

In line with the requirements of the ESRS E2-4 standard, the metrics reported in the below table are the annual quantities of additional pollutants<sup>73</sup> emitted into the atmosphere deriving from the E-PRTR registers drawn up by all sites of Eni's business sectors (Petrochemical, refining, exploration and production, and thermoelectric) in Europe, which fall within the scope of Regulation 166/06 E-PRTR and which have exceeded the applicable emission threshold indicated in Annex II thereof<sup>74</sup>. It should be noted that with regard to Eni sites outside Europe not falling within the scope of Reg 166/06, these essentially belong to the Upstream Business and carry out processes and operations that substantially generate pollutants from combustion processes or evaporation of hydrocarbons, pollutants already included in the reporting referred to in the previous table (NO<sub>x</sub>, SO<sub>x</sub>, NMVOC and PM).

(73) Referred to in Annex II of Reg 166/06 E-PRTR.

(74) The numbers shown in the table refer to the 2023 data, as the best possible estimate, of the 2024 information. In relation to non-European sites for which EPRTR registers are not available, as already stated, these are attributable to the Upstream business. It should be noted that, on the basis of the information available to date, the sets of pollutants reported respectively for air and water offer the best estimate of Eni emissions, representing the relevant parameters for all business lines.



## EMISSIONS OF POLLUTANTS INTO THE ATMOSPHERE

|   | Units of measurement | Air emissions |
|---|----------------------|---------------|
| <b>EPRT Parameters</b>                              |                      |               |
| Arsenic and compounds (expressed as As)             | (kg/y)               | 54            |
| Mercury and compounds (expressed as Hg)             |                      | 32.5          |
| Nickel and compounds (expressed as Ni)              |                      | 626.2         |
| Zinc and compounds (expressed as Zn)                |                      | 294.0         |
| Benzene   |                      | 16,389.79     |
| Chlorine and inorganic compounds (expressed as HCl) | (t/y)                | 19.7          |

Similarly, for releases of pollutants and off-site transfers to wastewater<sup>75</sup>, the following table shows the pollutants declared in the EPRT registers of sites that have exceeded the applicable threshold<sup>73,74,75</sup>. Also for release of pollutants in wastewater, it should be noted that in consideration of the specificities of the processes and operations

of non-European sites, and therefore of the Upstream Business, the relevance of contamination in the discharged water is attributable to the possible discharge of production water into the surface water body, a type of water for which the significant parameter is hydrocarbons (a parameter already included in the reporting in the table above).

## POLLUTANTS IN WASTEWATER

|   | Units of measurement | Emission in the water | Wastewater transfers |
|---|----------------------|-----------------------|----------------------|
| <b>EPRT Parameters</b>  |                      |                       |                      |
| Arsenic and compounds (expressed as As)                                 | (kg/y)               | 241.4                 | 30.1                 |
| Chromium and compounds (expressed as Cr)                                |                      | 78                    | /                    |
| Copper and compounds (expressed as Cu)                                  |                      | 153                   | /                    |
| Nickel and compounds (expressed as Ni)                                  |                      | 684.9                 | 28.9                 |
| Zinc and compounds (expressed as Zn)                                    |                      | 1,688.9               | 254.5                |
| Halogenated organic compounds (expressed as AOX)                        |                      | 4,009                 | /                    |
| Biphenyl polychlorurates (PCB)  |                      | /                     | 0.2                  |
| Trichloromethane  |                      | 481                   | /                    |
| Anthracene  |                      | /                     | 1.1                  |
| Benzene   |                      | /                     | 1,086.9              |
| Nonylphenol and nonylphenol ethoxylates (NP/NPE) and related substances |                      | /                     | 12.1                 |
| Ethylbenzene  |                      | /                     | 265.3                |
| Naphthalene   |                      | /                     | 12.2                 |
| Bis(2-ethylhexyl) phthalate (DEHP)                                      |                      | /                     | 8.8                  |
| Phenols (expressed as total C)  |                      | 364.9                 | 2,457.1              |
| Polycyclic aromatic hydrocarbons (PAH)                                  |                      | /                     | 25.2                 |
| Toluene   |                      | /                     | 569.5                |
| Total organic carbon (TOC) (expressed as total C or COD/3)              | (t/y)                | 320.2                 | 653                  |
| Xylenes   | (kg/y)               | 214                   | /                    |
| Chlorides (expressed as total Cl)                                       | (t/y)                | 71,326.8              | /                    |
| Cyanides (expressed as total CN)  | (kg/y)               | 149.1                 | 302.6                |
| Fluorides (expressed as total F)  |                      | 23,217.2              | /                    |
| Fluorant Antenna  |                      | 1.39                  | /                    |
| Benzo(g, h, i)perylene  |                      | 1.29                  | /                    |

(75) Off-site "transfer" means the movement, beyond the boundaries of an industrial complex, of pollutants contained in wastewater intended for treatment (Article 2, paragraph 11 of Regulation 166/06).



Below are shown the quantities of pollutant releases referable exclusively to Eni Rewind sites, also taken from the EPRT registers. These pollutants have been considered separately as they are residual quantities emitted downstream of the remediation processes deriving

from the operations of Eni Rewind sites (i.e. treatment of contaminated groundwater). Typically, these contaminants derive from the pre-existing site-specific contamination of the groundwater and are not representative of Eni's production processes.

## POLLUTANTS IN WASTEWATER ENIREWIND

|  | Units of<br>measurement | Emission<br>in the water | Wastewater<br>transfers |
|--|-------------------------|--------------------------|-------------------------|
| <b>E-PRTR Parameters</b>                                   |                         |                          |                         |
| <b>Total phosphorus</b>                                    | (kg/y)                  | <b>5,408.2</b>           | <b>/</b>                |
| Arsenic and compounds (expressed as As)                    |                         | 185.7                    | 12.6                    |
| Cadmium and compounds (expressed as Cd)                    |                         | 6.8                      | /                       |
| Chromium and compounds (expressed as Cr)                   |                         | 132.9                    | /                       |
| Copper and compounds (expressed as Cu)                     |                         | 68.2                     | /                       |
| Mercury and compounds (expressed as Hg)                    |                         | 1.4                      | /                       |
| Nickel and compounds (expressed as Ni)                     |                         | 98.4                     | /                       |
| Zinc and compounds (expressed as Zn)                       |                         | 983.9                    | /                       |
| 1,2-Dichloroethane (EDC)                                   |                         | 70                       | /                       |
| Pentachlorobenzene   |                         | 1.7                      | /                       |
| Tetrachloroethylene (PER)                                  |                         | 13.6                     | /                       |
| Tetrachloromethane (TCM)                                   |                         | 6.8                      | /                       |
| Trichlorobenzenes (TCB) (all isomers)                      |                         | 7.2                      | /                       |
| Phenols (expressed as total C)                             |                         | 96.8                     | /                       |
| Total organic carbon (TOC) (expressed as total C or COD/3) | (t/y)                   | 133.5                    | /                       |
| Chlorides (expressed as total Cl)                          |                         | 61,111.2                 | 21,000                  |
| Fluorides (expressed as total F)                           | (kg/y)                  | 4,308                    | /                       |

## WATER RESOURCES

### POLICIES<sup>76</sup>

Eni's commitment to water resource management is expressed within the [Code of Ethics](#) and then further detailed in Eni's [Position on water](#). In line with its commitments, Eni pursues the protection of water resources in all the Countries in which it operates and in all phases of its activities, seeking solutions beyond the corporate and operational boundary. Eni periodically evaluates the withdrawals of its sites also to identify actions to safeguard water resources, with particular regard to the reduction of high-quality fresh water withdrawals<sup>77</sup> of sites based in water-stressed areas<sup>78</sup>. Actions are defined considering the water risk mitigation criteria<sup>79</sup>: avoid, replace, reduce, recycle, restore. To

this end, projects are promoted to increase the efficiency of water use, use of remediated water or produced water to replace high-quality fresh water, and civil and industrial wastewater recycling systems; another important opportunity is represented by the use of desalinated water. Collaborations and the active engagement of stakeholders are promoted, for water management in harmony with the needs of the territory, to promote social development and safeguard ecosystems. In addition, Eni has an **internal regulatory framework** that defines the water resource management model and establishes the procedures for: the identification of areas at water stress; the management of withdrawals, methods of

(76) For further references see [The regulatory system](#), and [Reporting principles and criteria/Policies](#).

(77) High quality fresh water is understood as that coming from aquifers, surfaces, aqueducts.

(78) The areas of water stress are identified with the use of Aqueduct, a tool developed by the World Resources Institute, and monitored annually through an internal analysis implemented at the individual operating site.

(79) The principles of water risk mitigation are contained in the IPIECA 2021 document, Water management framework, 2<sup>nd</sup> ed.

use and water discharges; the identification of priority sites and interventions; reporting and communication activities. These tools aim to identify withdrawals and consumption in all sectors of activity to assess and minimise potential impacts on ecosystems and communities. The treatment, disposal or re-injection of water is subject to sector-specific best practices. Furthermore, procedures are defined to inform and involve stakeholders by promoting prior, free and informed consultation, in order to consider their requests on Eni's activities, new projects and development initiatives.

## TARGETS AND COMMITMENTS

Eni continues on its path to safeguard water resources, which over the years has seen the endorsement of the CEO Water Mandate and the publication of its [Position on water](#). In 2024, Eni declared its ambition to achieve water positivity by 2050 in its operated sites, through an approach that also takes into account actions at the river basin level, inspired by the principles of the Net Positive Water Impact (NPWI) proposed by the CEO Water Mandate. As an intermediate goal along its path towards the 2050 ambition, Eni is committed to achieving water positivity by 2035 in at least 30% of its sites with withdrawals greater than 0.5 Mm<sup>3</sup>/year of fresh water in water-stressed areas (as of 2023). The commitment to water positivity requires that Eni's actions to benefit the water resource in a specific basin exceeds the impacts of its operating sites. This commitment envisages in the next few years the declination into targets with appropriate site-specific monitoring metrics being defined. Actions to safeguard water will be addressed to the aspects identified as most critical for the territory, relating to the dimensions of the availability, quality and accessibility of fresh water. Eni's interventions will therefore be related to the identified needs and in consideration of the relevance of the operational sites, prioritizing the locations<sup>(80)</sup> at high water stress. In 2024, Eni verified the applicability of NPWI to one of its operational sites through a pilot study. To support these commitments, Eni adopts an internal framework of regulations and an [HSE management system](#) that, based on the knowledge of the reference context, the identification of legislative obligations and the expectations of stakeholders, ensures the definition of operational guidelines and the necessary [actions](#) for all businesses, guaranteeing monitoring, at least every six months, through the HSE review process and the use of specific [metrics](#) to ensure appropriate interventions in cases of misalignment with expected trends.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROS)

Eni recognises the importance of responsible water management and therefore carefully monitors water withdrawals, discharges and consumption in all operations, also considering the interest of all stakeholders categories<sup>(81)</sup>. The water resources management model adopted by Eni is based on the identification, assessment and minimization of the impacts on the water resources and on the prevention of adverse and/or illegal environmental events, as well as the maintenance and improvement of ecosystems. The process is an integral part of the broader management of environmental aspects in the various operating realities of the business units. About 90% of the water used in the industrial activities is seawater, and about 10% is fresh water, which is difficult to replace for many activities and whose accessibility could represent a potential risk to Eni's operations. Seawater is mainly used for cooling and, in upstream operations, for Improved Oil Recovery (IOR) and drilling, operations for which brackish surface or underground water can also be used. Fresh water is mainly used to produce demineralized water (used in the production process or to generate steam as an energy carrier) and for cooling.

## ACTIONS TAKEN ON MATERIAL IROS

Eni implements ISO 14001 and ISO 50001 certified management systems in sites with the higher HSE risk (see [Environment and Eni's management system](#)) and all projects are subject to the application of the ESHIA (environmental, social and health impact assessment) process. Eni carries out an annual analysis, in particular on fresh water, to assess the degree of exposure to water risk<sup>(82)</sup> of its assets and to identify new ideas to improve the management of the water resource by prioritizing and planning the interventions according to the business activities. Eni regularly carries out assessments of its suppliers and also continuously monitors the suppliers performance with regard to their ESG positioning and, consequently, their water management, promoting the adoption of management systems compliant with the main international standards among its contractors.

Based on water risk analyses, the main improvement interventions, addressed and planned in the sites where fresh water withdrawals in stressed areas is particularly relevant, occur in downstream industrial activities located in central-southern Italy and in upstream activities located in North Africa. The reduction of fresh water withdrawals is pursued by acting on several levers: increasing efficiency, recycling internal fresh water and replacing high-quality fresh water sources (groundwater, surface, municipal or third-party) with low-quality

(80) Sites with withdrawals of more than 0.5 Mm<sup>3</sup> in 2023 (priority sites) are associated with more than 90% of Eni's high-quality fresh water withdrawals in stress areas in 2023; positivity by 2035 is reached on 3 of the priority sites.

(81) For more information on community engagement, see the Eni [Environment and Eni's Management System](#) chapter.

(82) It should be noted that Eni does not deem the exposure to water risk as a top risk.



water, particularly in water-stressed areas, e.g. remediated water<sup>83</sup>, wastewater<sup>84</sup>, desalinated<sup>85</sup> or produced<sup>86</sup> water. However, safeguard actions are also addressed to sites that are not particularly exposed to water stress issues such as, for example, in Italy, at the Enipower plant in Ferrara Erbognone, where at the end of 2022 an innovative water filtration system was successfully tested, with an increase in water efficiency, or in Mantua, where actions are underway to increase fresh water recycling for cooling. Furthermore, in Ferrara, in May 2024, a memorandum of understanding was signed with local Stakeholders which contains priority lines of intervention aimed at reducing withdrawals from the Po River and, by 2025, a wastewater recovery and reuse system will be activated. Eni Rewind is committed to making the contaminated groundwater treated in its remediation plants (GTP - groundwater treatment plant) available for industrial use, thus contributing to the reduction of high-quality fresh water withdrawals. The commitment to increase the share of reinjected produced water<sup>87</sup> makes it possible to reduce the withdrawal of salt or brackish water, contributing to the protection of water resources, especially in areas of water stress, and, at the same time, increasing the recovery of hydrocarbons with their reinjection into the reservoir. Examples of actions in areas of stress, according to the different lines of intervention are:

- **Wastewater:** (i) Livorno Refinery, where a water reuse plant for industrial wastewater has been in use since 2023; (ii) Ravenna petrochemical hub, with a wastewater reuse plant, which will be operational from 2025; (iii) Petrochemical plant in Brindisi, with a plant for the reuse of about 0.4 Mm<sup>3</sup>/y of wastewater, which will be operational by 2026; (iv) Gela biorefinery, which since August 2024

has increased the reuse of urban wastewater for industrial purposes.

- **Remediated water:** (i) Eni Rewind in various sites, including Porto Torres, Priolo, Assemini, Manfredonia and Gela, treats contaminated groundwater to allow it to be used for industrial purposes; (ii) studies have been launched to evaluate the possibility of increasing its use in the industrial sites of Porto Torres and Priolo (as well as at the Mantua site, not under stress).
- **Produced water:** (i) in Val d'Agri in Basilicata, a project to treat and recover produced water (with a 72 m<sup>3</sup>/hour plant) for industrial use by replacing equal volumes of high quality fresh water, which will be started in 2027; (ii) projects for the optimal management of produced water at the Meleilha site (Agiba, Egypt) where the old reinjection plant was upgraded in 2023 and a new plant that will allow total reinjection for production purposes was built during 2025; in Turkmenistan, at the Burun site, an initiative that led, starting from October 2024, to the elimination of reinjection for disposal was completed.
- **Desalinated water:** the use of desalination plants in Egypt has made it possible to eliminate fresh water withdrawals at the Zohr site since the beginning of 2022 and to minimize, since November 2022, fresh water withdrawals at the Abu Rudeis site.

Financial resources used for water resource management include: (i) water supply, desalination, and cooling systems, (ii) wastewater monitoring and treatment, and (iii) water injection and reinjection facilities. About half of the total expenditure for the management of water resources is allocated to interventions at sites in water-stressed areas. For expected future resources, see the chapter on

■ **Environment and Eni management system.**

## EXPENDITURES<sup>(a)</sup>

|  | Units of<br>measurement | 2024   | 2023   |
|--|-------------------------|--------|--------|
| Total expenditures on water resources and discharges | (M€)                    | 178.21 | 149.29 |
| of which: current costs                              |                         | 127.71 | 124.34 |
| of which: investments                                |                         | 50.50  | 24.95  |

(a) The items in the table are included in the 2024 consolidated financial statements, in the item in ► **Note 14 "Intangible assets"** and in ► **Note 30 "Costs - Purchases, services and other charges"**.

(83) Contaminated groundwater from sites under remediation, which require treatment to remove pollutants prior to reuse/release.

(84) Combination of civil and industrial discharges in addition to rainfall collected and drained through sewer networks or drainage systems.

(85) Obtained by removing salt and impurities from seawater or other sources with high salinity.

(86) Water associated with oil and gas production that is treated and reused in the industrial cycle.

(87) Water associated with the extraction of hydrocarbons naturally present in the reservoir, which may contain contaminants. This water, properly treated, can be reused for production purposes to reduce water withdrawal.

METRICS<sup>88</sup>

## WATER CONSUMPTION

|   | Units of measurement | 2024     |                           | 2023     |
|---|----------------------|----------|---------------------------|----------|
|   |                      | Operated | Consolidated not operated | Operated |
| Water consumption                           | (Mm <sup>3</sup> )   | 45       | 9                         | 40       |
| Water consumption in area with water stress |                      | 17       | 7                         | 17       |
| Reused and recycled fresh water             |                      | 1,133    | 2                         | 1,066    |
| Water withdrawals <sup>(a)</sup>            |                      | 1,162    | 90                        | 1,150    |
| <i>of which: seawater</i>                   |                      | 1,032    | 82                        | 1,038    |
| <i>of which: fresh water</i>                |                      | 127      | 8                         | 109      |
| Water discharge <sup>(b)</sup>              |                      | 1,135    | 81                        | 1,126    |
| Fresh water reused                          | (%)                  | 90       | 26                        | 91       |
| Re-injected produced water                  |                      | 51       | 75                        | 42       |

(a) The total water withdrawals also includes a share of brackish water.

(b) Internal procedures govern the control of the minimum quality standards and authorisation limits prescribed for each operational site, ensuring compliance and timely termination if they are exceeded.

In 2024, seawater withdrawals (1,032 Mm<sup>3</sup>, equal to 89% of total water withdrawals) recorded an overall decrease compared to 2023 (-0.6%), as the increases in the upstream area (mainly in Indonesia and Ivory Coast for start-ups of activities) were offset by reductions in Enipower (zeroing of withdrawals from the Ravenna site due to the decommissioning of the only production unit that used seawater), Versalis (aromatic plants and logistics shutdown at the Priolo site) and Enilive (plant shutdown at Gela biorefinery). Fresh water withdrawals in 2024, amounting to approximately 11% of total water withdrawals and attributable to petrochemical and refining activities for more than 80%, recorded an increase compared to 2023 (+17%), mainly attributable to Versalis due to the entry into the consolidation domain of Novamont and to the higher contributions of the Mantua site in relation to the replacement of the measurement instrumentation system; fresh water withdrawals at the Sannazzaro refinery (less water recovery from the Water Reuse plant for extraordinary maintenance) and EniPower also increased. Upstream fresh water withdrawals decreased due to the sale of Nigerian Agip Oil Co Ltd. The volumes of recycled fresh water, more than 73% attributable to Versalis, increased by 6% (mainly due to the restored contribution of the Dunkirk site, where steam cracking had stopped in 2023) with a percentage of reuse of Eni's fresh water in 2024 of 90%, overall in line with the 2023 figure. In 2024, total water consumption in water-stressed areas was 38% of total water consumption; it should be noted that withdrawals of high-quality fresh water (i.e. deriving from surface water, groundwater and aqueduct) in water-stressed areas amounted to less than 2% of Eni's total water withdrawal. Re-injected produced water percentage in 2024 rose to

51% (42% in 2023), both due to asset disposals, new contributions in the Netherlands and Ghana and the increases recorded in Mexico.

## BIODIVERSITY

POLICIES<sup>89</sup>

Eni's commitment to safeguarding biodiversity is expressed in the [Code of Ethics](#) and detailed in [Eni's positioning on Biodiversity and ecosystem services](#). The policy outlines the process for identifying, assessing and managing dependencies and impacts (potential and actual) on biodiversity and ecosystem services, while also considering the consequences of these impacts on local communities, where applicable. This process applies, to both new and existing projects, throughout the entire lifecycle<sup>90</sup>. The identified impacts are managed through the application of the Mitigation Hierarchy<sup>91</sup>, which prioritizes preventive measures over corrective ones, with the aim to avoid a net loss of biodiversity or, where possible, to achieve a net gain. In addition to the BES Policy, Eni has adopted further commitments over time to protect areas of ecological importance. With the [Position on water](#), Eni promotes responsible and efficient management of water resources, protecting marine and fresh water ecosystems. Furthermore, through the [Eni's No-Go Commitment](#), Eni formally commits not to carry out hydrocarbon exploration and development activities within the boundaries of Natural Sites included in the UNESCO World Heritage List<sup>92</sup>. Lastly, [Eni's Position on Biomass](#) sets out the general principles to ensure that agricultural practices, procurement and consumption of raw materials are managed sustainably. These principles include

(88) For further methodological information, see [Reporting principles and criteria](#). Furthermore, the 2023 data for consolidated entities not operated by Eni (but by third parties) are not presented because, in the past, data were aggregated using a different methodology and therefore would not be comparable.

(89) For further references, see [The regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).

(90) In joint ventures in which Eni is not an operator, the commitment is to promote with partners the development and adoption of good management practices in line with our BES Policy.

(91) The mitigation hierarchy is an international best practice, for the management of risks and potential impacts on the environment, through a sequence of actions: (i) preventing and avoiding impacts; (ii) minimising impact where it cannot be avoided; (iii) restore and (iv) compensate.

(92) As of May 31st, 2019.



traceability and transparency along the supply chain, the selection of suppliers meeting ESG criteria and the inclusion of contractual clauses that ensure the supply of only certified biomass<sup>93</sup>. The certifications ensure that biomass does not originate from cropland converted from areas of high biodiversity value or from ecosystems that provide crucial ecological services, such as carbon capture and storage. To ensure the implementation of the policy commitments, Eni has developed an **internal regulatory framework** and a **HSE Management System**, which defines the process for identifying, prioritizing, managing and monitoring impacts on biodiversity. The effectiveness of the policy and actions is monitored through the implementation of the Biodiversity Action Plan<sup>94</sup> (see **Actions and metrics**).

## TARGETS AND COMMITMENTS

Although Eni does not identify quantitative targets at a consolidated level, Eni is constantly committed to implementing actions aimed at safeguarding biodiversity and ecosystem services, through an approach aimed at preventing and minimizing risks and impacts. Biodiversity is site-specific, with unique characteristics which vary profoundly according to geographical areas, the environmental conditions of ecosystems and ecological interactions. The lack of a universal metric recognized for measuring global biodiversity makes it challenging to define aggregated targets at group level. For this reason, Eni adopts a "site-specific" management approach, implementing, where necessary, Biodiversity Action Plans that identify targeted measures and local indicators. This approach allows for a more effective response to the specificities of each environmental context, ensuring concrete and measurable actions to address impacts on the territory. The activities are based on an internal Regulatory framework and an **HSE Management System** which, based on the understanding of the operational context, the identification of legal obligations and environmental compliance, as well as stakeholders' expectations, ensures the definition of operational guidelines for all businesses and the monitoring of the **actions** necessary for their implementation.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROs)

In the absence of actions aimed at **mitigating impacts**, Eni's activities could generate significant negative impacts in terms of degradation or loss of biodiversity (habitats, ecosystems and species) and ecosystem services, which may vary depending on the complexity of each project, the value of the natural environment and the social context. Among the most common impacts are those related to changes in land (or sea)

use, due to the physical presence of facilities and infrastructures, which can lead to the removal, degradation or fragmentation of habitats with consequences on species. In upstream oil and gas activities and in the large-scale development of renewable energy generation facilities, the impact is significant if it involves natural or semi-natural areas<sup>95</sup>. In addition, wind farms can have impacts on particularly vulnerable species, such as birds of prey, due to the risk of collision with turbines, wind blades and power distribution lines. On the other hand, the downstream activities take place in already industrialized areas with a lower contribution to land use change. The process of identifying and assessing dependencies and impacts on biodiversity and ecosystem services (BES) is part of the **HSE Management System** and, in line with ISO 14001:2015 certification, each site carries out environmental impact assessment (EIA) studies. In addition to this process, Eni has adopted a "BES Management Model" to address and monitor the effects of its activities on priority areas for biodiversity conservation, in particular legally protected areas and Key Biodiversity Areas (KBAs)<sup>96</sup>. The BES management model, which applies to the sites operated by the Company, is based on the assessment of biodiversity loss risk and includes: (i) mapping sites in relation to protected areas and KBAs to identify those at higher risk of significant impact; (ii) conducting in-depth studies (BES Assessment) to characterise the operational and environmental context, and to identify and assess dependencies as well as direct<sup>97</sup> and indirect<sup>98</sup> impacts; (iii) confirming priority sites among those that, following the in-depth studies, show significant residual impacts; (iv) designing and implementing Biodiversity Action Plans (BAPs) for priority sites to mitigate these impacts. The engagement of local stakeholders begins in the early stages of a project and continues throughout its life cycle, typically through dedicated consultations and/or workshops. Engaging with communities, indigenous peoples and other local stakeholders helps to understand expectations and concerns, assess the use of ecosystem services and biodiversity and identify management options that also include local needs. In identifying potential impacts, Eni considers the interactions between its activities and the environment, as well as how these may affect the main globally recognized drivers of biodiversity loss<sup>99</sup>, which are land and sea use change, overexploitation of natural resources, climate change, pollution and the introduction of invasive species. The next step is the assessment of the impact significance, combining the magnitude of the impact (e.g. project pressures on environmental matrices) with the sensitivity of the BES receptor (e.g. presence of species at risk of extinction), assigning a significance category<sup>100</sup>. This process also applies to dependencies on biodiversity and ecosystem services, also considering competition with other human activities and with communities in the same areas in which

(93) Sustainability certification schemes recognized at European or international level.

(94) A BAP is a plan that defines actions to mitigate impacts and to conserve or enhance biodiversity. It identifies priority elements and details appropriate management actions, which must be concrete, planned and measurable.

(95) It is an ecosystem with most of the processes and biodiversity intact, although altered by human activity (IPBES glossary).

(96) Key Biodiversity Areas (KBAs) are sites that contribute significantly to the persistence of biodiversity in terrestrial, fresh water and marine ecosystems (International Union for Conservation of Nature, IUCN).

(97) For the identification of direct impacts, any change (potential or actual) in the state of nature caused by an Eni activity with a direct causal link (due to the physical presence of plants and infrastructures and related activities such as emissions, discharges and waste) is considered.

(98) For indirect impacts, on the other hand, an indirect causal link is considered (e.g. greater colonization of the areas surrounding the operational sites can lead to increased access to previously inaccessible natural areas through the opening of service roads).

(99) As indicated in the "Global Assessment Report on Biodiversity and Ecosystem Services", IPBES 2019.

(100) Negligible, low, medium, high and critical.

Eni operates. Eni's main dependencies are water resources and biomass, as well as some regulatory services such as coastal protection or soil stability. However, the relevance of these dependencies varies across business sectors. For example, biomass supply is particularly relevant for biofuels production, while the Oil & Gas and renewable energy portfolios (solar and wind) are entirely independent from biological resources. The **identification and assessment of biodiversity-related risks and opportunities** have been supported by the review of publicly available scenarios, which were used to assess how changes in nature could translate into physical risks (e.g. ecosystem degradation), transition risks (e.g. regulatory or reputational) or opportunities (e.g. nature-based solutions). The main biodiversity-related risks are: (i) **physical risk**, which involves ecosystems degradation and the potential reduction in water availability, that could affect the operability and profitability of assets in specific businesses; (ii) **transition risks** (regulatory/policy), mainly deriving from the evolution of laws and policies that expand protected areas and restrict access to natural resources in specific geographic regions. **Reputational risks** are also considered: a negative perception of the energy sector can lead to increased litigation, with potential damage to public image and reputation. Moreover, reduced sector attractiveness may result in divestments and limitations in accessing new funding or forming partnerships with international organizations. The **process and the results of Eni's double materiality analysis** have led to the exclusion of immediate material risks (including systemic risks<sup>(101)</sup>) and currently achieved opportunities related to biodiversity. To assess the **resilience** of Eni's strategy against these risks, an internal analysis was carried out using the qualitative approach indicated by the TNFD<sup>(102)</sup> "Guidance on scenario analysis". For resilience to physical risks, see the chapter **Climate change**. For transition risks, a publicly available integrated climate-nature scenario was consulted to explore possible future trajectories by considering variables such as the state of global biodiversity, the adoption of different environmental protection policies or shifts in consumer behaviour. Specifically, the resilience analysis focused on Eni's direct operations and considered the main assumptions and the macro-trends from the "FPS" scenario of "Inevitable Policy Response"<sup>(103)</sup>, with a time horizon from 2020 to 2050. The scenario highlights that the global context in which Eni operates is increasingly aware of the importance of safeguarding biodiversity and ecosystem services, which could, through

new regulations, limit bioenergy crop production in specific regions. Eni's resilience to these risks is grounded in a strategy that combines global portfolio diversification, the development of new technologies and the adoption of circular business models. In this context, the company has implemented an approach that includes diversifying the types of agri-feedstock used and the areas from which they are sourced, as well as maximizing the use of waste and by-products to reduce the consumption of virgin raw materials.

## ACTIONS TAKEN ON MATERIAL IROs AND METRICS<sup>(104)</sup>

Currently, 32 concessions<sup>(105)</sup> of the upstream O&G portfolio (approximately 655.5 k hectares) and 28 operational sites<sup>(106)</sup> (approximately 3.8 k hectares) related to the other business lines<sup>(107)</sup> (including 18 sites for renewable energy production) overlap with priority biodiversity conservation areas<sup>(108)</sup>. These areas are characterized by about 76% terrestrial habitat, 20% marine and 4% mixed habitat. Additionally, 41 concessions<sup>(109)</sup> (about 137.7 k hectares) and 62 sites<sup>(110)</sup> (3.03 k hectares), including 40 sites for renewable energy production, are adjacent<sup>(111)</sup> to these areas, which consist of about 86% terrestrial habitat, 8% marine and 6% mixed habitat. For sites where there is overlap, BES Assessment studies are conducted, prioritized based on risk and, where necessary, Biodiversity Action Plan (BAP) are implemented to manage significant residual impacts on protected areas and KBAs. The BAP is the primary tool for implementing and monitoring actions aimed at mitigating the identified impacts, ensuring compliance with the commitments set out in the **BES Policy**. The table lists the sites and concessions, in which Eni is the operator, and where BAPs are already being implemented. The main impact observed at these sites relates to land use change resulting from the infrastructure of the upstream Oil & Gas activities (pipelines installation and construction of well pads) and Plenitude's power generation facilities. This change can lead to the loss or degradation of habitats, potentially disrupting the species that inhabit them. To mitigate this impact, the BAPs of these sites focus on two priority areas of intervention: (i) the restoration of natural habitats that have been modified or degraded, and (ii) monitoring campaigns aimed at confirming the presence of endangered species<sup>(112)</sup> and assessing potential impacts on their conservation status.

(101) Risks arising from the breakdown of the entire system, rather than the failure of individual parts. They are characterised by modest tipping points combining indirectly to produce large failures with cascading of interactions of physical and transition.

(102) The TNFD (Taskforce on Nature-related Financial Disclosures) is an international initiative created to help companies and financial institutions manage risks and opportunities related to nature and biodiversity.

(103) The Inevitable Policy Response (IPR) "FPS" (2023 report) is a forecasting scenario that integrates the energy sector with the land use sector and models the impact of the forecasts of more than 300 policies on the real economy until 2050. Specifically, the IPR Land and Nature scenario is based on assumptions related to food demand, climate-nature policies and actions and climate and biophysical data and describes how these variables impact the environment in terms of emission levels and biodiversity and how land use changes.

(104) For the methodology and scope of consolidation, see the chapter **Reporting Principles and Criteria**.

(105) In Italy, the Netherlands, Nigeria, the United Kingdom and the United States (Alaska). The highest number of concessions (81%) overlapping with protected areas is found in Europe (Italy and the Netherlands) and the United Kingdom.

(106) About 90% in Italy, the remaining 10% in Spain and France.

(107) O&G Downstream, Enilive, Plenitude, Enipower and Versalis.

(108) It includes KBA, IUCN protected areas (I-VI), Natura 2000, WHS, Ramsar and other nationally and internationally protected areas from global databases.

(109) 59% of the concessions are located in Alaska, all sold on 4th November 2024 to a third-party company. The remaining part is mainly located in Italy (39%) and only 2% in Tunisia.

(110) Mainly located in Italy (74%) and other European Countries (23%). Only 3% in Australia and the United States.

(111) For the definition of adjacent concessions and sites, please refer to the section **Metrics: methodologies**.

(112) Species included in the IUCN (International Union for Conservation of Nature) Red List, the main global tool for assessing the conservation status of animal and plant species, classified on the basis of the risk of extinction: Extinct (EX); Extinct in the wild (EW); Critically Endangered (CR); Endangered (EN); Vulnerable (VU); Near threatened (NT); Minor Concern (LC).

PRIORITY SITES OVERLAPPING AREAS OF HIGH BIODIVERSITY VALUE<sup>113</sup>

| Sites/<br>concessions   | Area<br>(hectares) <sup>114</sup> | Main activities/<br>impact on<br>biodiversity  | Impact<br>metric <sup>115</sup>   | Affected<br>biodiversity areas  | Main mitigation and monitoring actions of the BAP   |
|---|-----------------------------------|--|---|---|---|
| <b>Italy</b><br>Val D'Agri oil<br>and gas<br>production<br>concession   | 52.6 k                            | <b>Land use change</b><br>Loss or degradation of<br>forest habitat due to the<br>laying of pipelines and<br>the construction of well<br>pads (and partial soil<br>sealing)   | <b>Hectares of<br/>habitat lost or<br/>degraded</b>   | • Parco nazionale<br>dell'Appennino<br>Lucano-Val d'Agri-<br>Lagonegrese; Riserva<br>regionale Abetina di<br>Laurenzana;<br>• 1 KBA Agri Valley;<br>• 11 Natura 2,000<br>sites <sup>116</sup> | • Since 2003, 154 ha have been under restoration (92% of the target of restoring 100% of the restorable areas <sup>117</sup> , 167 ha, by 2026).<br>• BAP activities (with an expenditure of €223k in 2024, and €800k planned for 2025-2028) carried out with the support of NGOs, universities and local experts.<br>• Periodic monitoring (at least until 2026) to verify the effectiveness of interventions and confirm the presence and status of endangered species.<br>• To date, the presence of the Apennine toad (endangered species), the wildcat and the wolf have been identified (trigger species for critical habitat).<br>• Ongoing monitoring of bats to assess potential impacts of artificial lighting.<br>• A restoration plan has been developed for a degraded wetland to improve amphibian habitat.   |
| <b>Italy</b><br>Collarmente<br>Wind Farm  | 234 <sup>118</sup>                | <b>Land use change</b><br><b>Impacts on species</b><br>modification of<br>the habitat due to<br>the presence of<br>wind turbines and<br>interference with the<br>flight of birds   | <b>Hectares of habitat<br/>lost or degraded</b><br><br><b>Number of collision<br/>events/year</b> | Natura 2000: Sirente,<br>Velino, Colle del<br>Rascito<br><br>KBA: Sirente, Velino<br>e Montagne della<br>Duchessa   | • Memorandum of understanding with the Sirente Velino Regional Natural Park, with implementation starting in 2025.<br>• Mitigation actions are planned (e.g. the installation of detection cameras, acoustic deterrent and shutdown systems, capEx €180 k) and monitoring for at least 1 year to assess the effectiveness of the measures (about € 12 k/year).  |
| <b>Alaska</b><br>Nikaitchuq and<br>Oooguruk oil and<br>gas production<br>concessions <sup>119</sup>   | 25.1k                             | <b>Change of land and<br/>sea use</b><br>Loss of marine (shallow<br>waters) and terrestrial<br>(tundra) habitats due<br>to the development of<br>the infrastructure (and<br>partial onshore soil<br>sealing and degradation) | <b>Hectares of habitat<br/>lost or degraded</b>   | Beaufort Sea<br>Nearshore (KBA)   | • The BAP included actions to restore the 5.4 hectares of tundra converted into onshore infrastructure.<br>• Arctic tundra workshop (2023) to share knowledge and identify needs with local stakeholders.<br>• Preliminary assessments (2024) on the impacts of heat and dust emissions on the tundra.<br>• Monitoring campaign on nesting coastal birds, to assess the impact of noise, lighting and collision risk.<br>• The activities carried out in 2024 had an expenditure of €570k.  |
| <b>Ghana</b><br>Onshore reception<br>facility of the<br>Offshore Cape<br>Three Point<br>production site <sup>120</sup><br>Offshore Cape<br>Three production<br>site | 96                                | <b>Land use change</b><br>Loss of forest habitat<br>due to infrastructure<br>development (and partial<br>soil sealing)   | <b>Hectares of habitat<br/>lost or degraded</b>   | Amansuri wetlands<br>(KBA)  | • Goal to ensure "No Net Loss" of natural habitat over the 20 years of the project (until 2040), with restoration of 11 ha of deforested areas and conservation actions on about 22 ha of natural forest to offset <sup>121</sup> the non-restorable habitat (expenditure of €150 k in 2024, of which 82 k€ for offset, and €7,216 k allocated for environmental studies and monitoring in 2025-2028).<br>• In line with the planning, the replanting of the deforested areas has been completed;<br>• Monitoring of offset and restoration of deforested areas through different indicators (Leaf Area, forest bird diversity and species richness), with a progress of 25%, in line with the planning.<br>• Planned investments from the World Bank and alignment with IFC performance standards and guidelines, which carries out quarterly and annual audits through independent consultants. |
| <b>United Kingdom</b><br>Liverpool Bay,<br>(pipeline) <sup>122</sup>  | 4                                 | <b>Land use change</b><br>Loss and deterioration<br>of dune habitat due to<br>pipeline laying  | <b>Hectares of habitat<br/>lost or degraded</b>   | Gronant Dunes<br>and Talacre Warren<br>SSSI, Dee Estuary<br>Ramsar Site <sup>123</sup>  | • Launched in 1994 a restoration program for the dunes of Gronant and Talacre (4 ha) impacted by the laying of the pipeline with an expenditure of €68k in 2024 and €270k expected for the 2025-2028 period.<br>• The restoration programme also focuses on enhancing and protecting the most degraded dune areas, due to the pressure of recreational activities, and involves collaboration with local authorities to control access.<br>• A further 66.7 hectares of dunes have been acquired to ensure long-term management and monitoring of this habitat.<br>• The implementation of the management plan is ongoing.<br>• Two species have been successfully reintroduced: the natterjack toad and the sand lizard.   |
| <b>Spain</b><br>Bonete<br>Solar plant   | 193                               | <b>Land use change</b><br>Impacts on species<br>Habitat loss or<br>deterioration due to<br>Bonete II and Bonete<br>III plants  | <b>Hectares of habitat<br/>lost or degraded</b>   | • Natura 2000: Área<br>esteparia del este<br>de Albacete<br>• KBA:<br>Pétrola-Almansa-<br>Yecla   | Implementation of the BAP since the start-up of the plant in 2020 with ongoing actions (approx. €30k/year 2024-2028) including:<br>• Vegetation management plan for the solar plant (elimination of herbicides and agrochemicals and replacement of barley - intensive crop - with grasslands to promote the diversification of pollinators and arthropods).<br>• Replanting with native species around the facilities and regular monitoring.<br>• Measures to support wildlife (installation of nests for birds and bats and water troughs, modification of fences).<br>• Collaboration with a neighboring farm to implement agri-environmental measures supporting steppe birds.<br>• Environmental monitoring of fauna and the effectiveness of conservation measures.  |

(113) For more information on overlapping sites, please refer to the [eni.com](https://www.eni.com) website.

(114) It indicates the area (in hectares) of sites or concessions that intersect even marginally the boundaries of protected areas and KBAs. This figure represents an overestimate, as it also includes areas that are not actually overlapping.

(115) Metric used in BAP for monitoring mitigation actions.

(116) Sites: Abetina di Laurenzana, Monte della Madonna di Viggiano; Monte Caldarosa; Monte Volturino; Serra di Calvello, Lago Pertusillo, Appennino Lucano, Monte Volturino, Faggeta di Monte Pierfaone, Valle Agri, Monte Sirino, Monte Raparo.

(117) Habitats that can be restored during the current operational phase of the project. The remaining part of the habitat will only be restorable during the decommissioning phase, at the end of the project's life.

(118) It corresponds to the area of the polygon that encloses all the wind turbines. The actual surface occupied (the footprint of the turbines), is less than one hectare.

(119) It should be noted that 100% of Nikaitchuq and Oooguruk's Alaska assets were sold on November 4, 2024 to a third-party company.

(120) The concession does not overlap with protected areas or KBAs, but the ground receiving facility (ORF) overlaps with a KBA.

(121) Biodiversity offset refers to the compensation of residual negative impacts on biodiversity caused by the development of a project, after taking all possible prevention and mitigation measures. It represents the last step in the mitigation hierarchy.

(122) Concession 110/13b is not overlapping but the pipeline connecting the wells (Douglas platform) to the Point of Ayr gas terminal crosses the protected areas.

(123) Only the protected areas that were present at the time of the pipeline laying activity are listed.

In addition to the assets where Eni is the operator, Eni participates in some concessions operated by third parties that overlap with protected areas. These include: (i) in Kazakhstan, the Kashagan concession (NCOC) which overlaps with the protected area "State Reserved Zone in Northern part of Caspian Sea"; (ii) in Egypt, four concessions<sup>124</sup> operated through the company Petrobel which overlap with the El Qa plain (KBA). In these areas, Eni oversees BES Assessment activities and has implemented a BAP aimed primarily at mitigating impacts on modified desert habitats, which are affected by waste awaiting treatment and disposal. The key intervention involves the cleaning, characterization and reclamation of degraded land. Additionally, ongoing assessments are being conducted to evaluate potential impacts on migratory bird species, which trigger the KBA status of the El Qa plain.

## RESOURCE USE AND CIRCULAR ECONOMY

### POLICIES<sup>125</sup>

Eni's commitment to the circular economy is outlined both in the [Code of Ethics](#) and in the **internal Regulatory Framework** which promote production and consumption models based on the regenerative principles of the circular economy, aimed at reducing the use of virgin and non-renewable resources. These principles are applied to Eni's activities, through actions aimed at improving efficiency, reducing waste, maximizing the recovery and valorisation of waste and by-product, using secondary raw materials or renewable sources, extending the lifespan of its assets as well as innovating processes and products, in order to generate long-term value for both the environment and society.

### TARGETS AND COMMITMENTS

Eni promotes waste prevention in line with the priority criteria in waste management established by EU legislation and ensures proper management, as required by internal regulatory framework. Waste production is influenced by factors that may go beyond routine operations (e.g. extraordinary maintenance interventions, changes in project timeline) and by exogenous factors (e.g. authorisation issues, regulatory changes, modifications in scope, etc.) making it challenging to define quantitative reduction targets; despite this, Eni is committed to implementing projects with a strong circular footprint (see [Actions taken on material IROs](#)). Eni adopts an internal regulatory framework and a [HSE Management system](#) that, based on the understanding of the operational context, the identification of legislative obligations, environmental compliance and stakeholder expectations, as well as the assessment of impacts, risks and opportunities, ensures the definition of operational guidelines for all businesses. In addition, it guarantees the biannual monitoring of the actions necessary for

their implementation and tracks specific KPIs for the timely control of performance and for the rapid intervention in cases of misalignment with the expected outcomes.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROs)

In order to assess impacts, risks and opportunities, all Eni companies, relevant according to the HSE risk assessment clustering, were considered in terms of waste generation, resource use<sup>126</sup> and circular economy actions. With regards to material impacts, waste generation and treatment represent a negative impact that Eni can potentially generate on environmental matrices (soil, water and air) and on local communities, while carrying out its activities. Eni's operations, by their nature, involve waste generation and the associated negative impacts include the potential contamination of environmental matrices in the event of inadequate management, the impacts associated with the transportation and treatment at the destination facilities and the land consumption associated with such facilities. The waste produced by Eni derives from both production and remediation activities; regarding the latter, most of the volumes are related to contaminated groundwater, which is treated at Eni Rewind's groundwater treatment plants (GTP), making it available, where possible, for industrial and environmental uses, and thus contributing to the reduction of high-quality water withdrawals. Waste production from soil and groundwater remediation is also related to assets that Eni acquired from other companies but where it has never operated directly. In this context, Eni Rewind also offers remediation and waste management services to third parties, leveraging its internal technologies and know-how. With regards to the composition of waste from production activities, when not managed as discharge, produced water represents the most significant contribution. These waters are generally characterized by a very high salinity and variable composition, with the presence of residual components, including hydrocarbons and additives, following the fluid separation process. On the other hand, waste from remediation activities is mainly composed of groundwater most of it containing contaminants such as hydrocarbons, benzene and dichloroethane. The double materiality assessment also highlighted a positive impact on the environment resulting from actions for a circular economy, through the repurposing and redevelopment of assets and brownfield sites, as well as the use of raw materials from renewable sources and recycling within production processes.

## ACTIONS TAKEN ON MATERIAL IROs

### Circular Economy

The circular economy is an important lever for achieving global environmental protection goals. As such, Eni integrates circularity principles into its business model, applying them in the development

(124) Oil and gas production concessions in Sinai are: Belayim Land DI, Ekma DI, Feiran DI, Ras Gharra DI.

(125) For further references, see [The regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).

(126) For water, see the chapter [Water Resources](#).



of new product value chains as well as in existing ones. In Eni's **downstream** business, a key initiative is the transformation of traditional refineries into biorefineries. In 2024, the conversion of the refinery in Livorno for HVO production has started, with completion and start-up expected by 2026. This project will add on the Enilive biorefineries in Porto Marghera (since 2014), and in Gela (since 2019). Through the conversion of the Livorno industrial site, Eni confirms its commitment to increasing biorefining capacity from the current 1.65 million tons/year to over 5 million by 2030 (for more details see [Climate change](#)). Enilive's circular projects include the production of advanced biofuels mainly derived from waste such as used cooking oils – along with a residual part of vegetable oils – and the production of biomethane obtained from organic residues (agricultural and agro-industrial waste, livestock wastewater and organic waste). Additionally, at the Sannazzaro site, Eni is currently assessing the process to transform non-recyclable waste into circular methanol and hydrogen through the Waste to Chemicals technology. The biorefineries are also part of certified supply chains that include initiatives for the recovery of degraded soils in different Countries in Africa, Southeast Asia and Central Asia, through the cultivation of oilseed plants for biofuels production. The by-products resulting from these processes are also valued and transformed into animal feed and fertilisers. In the chemical sector, **Versalis** is leading different circularity and sustainability initiatives: (i) in the field of bio-based chemicals, and through the recent acquisition of Novamont, it is strengthening its commitment to feedstock diversification by using renewable raw materials, such as biomass, for the production of chemicals, plastics and other products; (ii) it is also developing products containing recycled materials alongside complementary recycling technologies, both mechanical and chemical, for plastics and rubbers, supported by internal research and collaborations with associations, consortia and other industry stakeholders. In this field, in 2024 REFENCE™<sup>127</sup> was launched – a range of recycled polymers mainly for food packaging. Additionally, at the Porto Marghera site, the construction of the first plant for recycled plastic processing was completed, with start-up scheduled for early 2025. Finally, in Mantua, Italy, activities to launch the Hoop® demonstration plant continued. Based on the pyrolysis process, this plant will transform mixed plastic waste – non-recyclable through mechanical process – into a raw material (recycled oil) that can be used to produce polymers with the same characteristics as virgin ones. **Eni Rewind** has planned the implementation over the next three years of a plant in Viggiano (PZ) for the treatment and recovery of produced water associated with the extraction of hydrocarbons. This will prevent the need for liquid waste to be managed by tanker, as these waters will instead be recovered, treated and reused in industrial processes. In addition, within the next two years, the construction of the Ponticelle (RA) bio-remediation plant is planned. This facility will focus on the valorisation of soil from remediation activities and it will include the creation of an environmental platform for the sorting and preparation of industrial waste to maximize

and optimize the subsequent recovery process. Both platforms will enable the recovery of waste that would otherwise be destined for disposal in landfills. In the **upstream** business, the main initiatives, currently under screening phase, focus on the repurpose of mature assets that have reached the end of their production phase, including the reuse of single components and recycling of materials. Examples include the reuse of platforms for the installation of offshore data center facilities (with feasibility studies planned in 2025 in the Adriatic Sea) and the repurposing of onshore sites for the construction of wind and solar power plants (in 2024 preliminary feasibility evaluations were conducted to assess the conversion of a few Italian industrial areas). **Plenitude** focuses its commitment on revamping and repowering studies to extend the useful life of its assets and, through research activities, on analyzing decommissioning scenarios for renewable energy production plants.

The measurement of circularity plays a crucial role for control, management and transparency. With the support of the Scuola Superiore Sant'Anna of Pisa, Eni has developed a circularity measurement model based on internationally recognized principles and validated by a third-party certification entity. Eni has also collaborated with the working groups of UNI (Italian Standards Organization) and ISO (International Standardization Organization). In 2023, Eni launched a pilot project for the application of the experimental UNI TS 11820 standard for measuring circularity. Following the finalization of the standard in 2024. The assertion of circularity for offices, laboratories as well as business support functions and service companies (the so-called "Support Function") has been verified by a third party auditor.

## Waste

As far as waste management activities are concerned, Eni pays particular attention to the traceability of the entire process and to the due diligence activities run on the parties involved in the disposal/recovery chain, seeking every viable solution aimed at waste prevention. Almost all waste management activities in Italy are managed by Eni Rewind, which has continued its digitization project launched in 2020 to improve the efficiency and monitoring of its waste management process. In order to limit the negative impacts related to waste, only authorised third parties are considered, favouring recovery solutions over disposal solutions, in line with the priority criteria indicated by EU and national legislation. Eni Rewind, based on the characteristics of the individual waste, selects technically feasible recovery and disposal solutions, favouring recovery, treatment operations that reduce the quantities sent to final disposal and suitable plants at a shorter distance from the waste production site; in addition, audits on environmental suppliers are carried out evaluating their operational waste management. Since treatment plants are not always available within the operational sites, waste treatment is mainly carried out at off-site third-party plants, properly authorized according to local regulations. Regarding foreign

(127) The NEWER™ technology allows the purification of recycled polymers, ensuring compliance with the EU/1616/2022 Recycling Regulation.



sites, Eni's optimal waste management strategy is implemented through the reduction of waste production, the improvement of its collection and segregation processes. Furthermore, by applying the principles of circular economy, Eni is committed to optimizing the recycling and reuse of materials, both through more specific reporting in waste management and through new opportunities for waste valorisation. Eni also continues to promote awareness-raising activities among its foreign subsidiaries, also through dissemination and sharing of initiatives and experiences for proper

waste management and valorisation. In all the companies in which Eni operates, it is committed to complying with current waste legislation and reducing the environmental impacts associated with the various phases of the management process. For this reason, Eni monitors the evolution of sector regulations and adopts tools and procedures to support waste management. Among the tools Eni adopts there is also the involvement of HSE structures in the evaluation of suppliers and the use of IT applications that support waste management.

## WASTE EXPENSES<sup>(a)(b)</sup>

|   | Units of<br>measurement | 2024   | 2023   |
|---|-------------------------|--------|--------|
| Waste management expenses and investments | (M€)                    | 246.57 | 222.30 |
| <i>of which: current expenses</i>         |                         | 228.75 | 217.59 |
| <i>of which: investments</i>              |                         | 17.82  | 4.71   |

(a) For the main expenses related to the circular economy, please refer to the Capital Allocation paragraph in the [Climate Change](#) chapter.

(b) The items in the table are included in Eni's 2024 consolidated financial statements, in the item in [Note 14 "Intangible assets"](#) and in [Note 30 "Costs - Purchases, services and other charges"](#).

## METRICS<sup>128</sup>

### WASTE

|   | Units of<br>measurement | 2024     |                              | 2023     |
|---|-------------------------|----------|------------------------------|----------|
|   |                         | Operated | Consolidated not<br>operated | Operated |
| Total waste generated   | (million tonnes)        | 4.4      | 0.7                          | 4.5      |
| Total hazardous waste   |                         | 0.6      | 0.5                          | 0.6      |
| Hazardous waste diverted from disposal (recovered/recycled)     |                         | 0.1      | 0.0                          | 0.2      |
| Hazardous waste for disposal                                    |                         | 0.6      | 0.5                          | 0.3      |
| <i>Of which: incinerated</i>                                    |                         | 0.0      | 0.0                          | 0.0      |
| <i>Of which: in landfill</i>                                    |                         | 0.1      | 0.0                          | 0.0      |
| <i>Of which: other disposal operations</i>                      |                         | 0.5      | 0.5                          | 0.3      |
| Non-hazardous waste diverted from disposal (recovered/recycled) |                         | 0.8      | 0.0                          | 0.9      |
| Non-hazardous waste for disposal                                |                         | 2.8      | 0.1                          | 2.9      |
| <i>Of which: incinerated</i>                                    |                         | 0.0      | 0.0                          | 0.1      |
| <i>Of which: in landfill</i>                                    |                         | 0.1      | 0.0                          | 0.1      |
| <i>Of which: other disposal operations</i>                      |                         | 2.7      | 0.1                          | 2.7      |
| Total amount of non-recycled waste                              | (%)                     | 79       | 98                           | 74       |

In 2024, more than 4 million tons of waste were produced at Eni, of which 1.2 million tons from production activities and 3.2 million tons from remediation activities, with an overall trend down by 1% compared to 2023. Waste from production activities generated in 2024 fell by a total of 25% compared to 2023, due to the reductions recorded for both hazardous and non-hazardous waste. The trend was influenced by the sale of the company in Nigeria (Nigerian Agip Oil Co Ltd), the sale of the sites in Alaska by Eni US Op. Co Inc, the end of drilling and construction activities in the Ivory Coast and the reduction of production water disposed of in Gela. In 2024, more than 300 thousand tons of waste from production

activities were sent for recovery and recycling, decreasing by 38% compared to 2023. The 3.2 million tonnes of waste from remediation activities (of which 2.6 million from Eni Rewind) have increased by 14% compared to 2023, mainly due to the start of new construction sites at the Sannazzaro refinery. Most of the remediation waste consists of water treated in GTP plants (over 60% in 2024), partly reused and partly returned to the environment. In 2024, more than 596 thousand tons of remediation waste were sent for recovery and recycling, decreasing by 4% compared to 2023, mainly due to a reduction in remediation activities in the Eni SpA distretto meridionale.

(128) For the methodology and scope of consolidation, see the chapter [Reporting Principles and criteria](#).



# EU Taxonomy

Regulation EU 852/2020 of the European Parliament and of the Council enacted in 2020 has established a classification system of economic activities based on criteria of environmental sustainability for the purposes of channeling productive investments.

An economic activity is environmentally sustainable where that economic activity: (i) contributes substantially to one or more of the environmental objectives of the EU; (ii) does not significantly harm any of the environmental objectives; (iii) is carried out in compliance with the minimum safeguards foreseen by the Regulation, which are procedures implemented by an undertaking that is carrying out an economic activity to ensure a responsible business conduct. Eni has verified the eligibility of the economic activities conducted by the Group in relation to the EU sustainability objectives regulated by the Commission, through alignment with the Delegated Acts:

- for the objectives of climate change mitigation and adaptation to climate change, the "Climate Delegated Act" (EU Delegated Regulation 2021/2139, structured into two annexes), supplemented by the Complementary Delegated Act (EU Regulation 2022/1214), which governs the production of electricity from nuclear and gas;
- for the objectives: (i) sustainable use and protection of water and marine resources; (ii) transition to a circular economy; (iii) prevention and reduction of pollution; (iv) protection and restoration of biodiversity and ecosystems, the "Environmental Delegated Act" (EU Delegated Regulation 2023/2486, including four Annexes).

As the next step, the Group evaluated the degree of alignment of its

economic activities with the objectives of the Taxonomy through the verification of compliance with the "Technical Screening Criteria - TSC," which are the performance conditions for an economic activity to make a substantial contribution to the objective and respect the "do no significant harm" principle to other objectives. Furthermore, for each activity, compliance with the safeguard clause was verified. The Group's economic activities capable of making a substantial contribution to the climate change mitigation objective were identified. The Group does not produce products or services for climate change adaptation, while activities contributing to environmental objectives, in consideration of the limited number of eligible activities and the selectivity of the TSC, are minimal, in the Eni consolidated financial statement.

Based on the reporting criteria established by the Commission through Delegated Act EU 2021/2178, the key performance indicators (KPIs) of Eni's activities aligned with the Taxonomy for 2024 and the corresponding comparison period were calculated.

## REPORTING OBLIGATIONS AND BASIS OF PRESENTATION

With Delegated Regulation (EU) 2021/2178, the Commission defined the content and the presentation methods for the three performance indicators ("KPIs") related to the share of revenues, operating costs ("opex"), and investments ("capex") associated with economic activities aligned with the total of these three items at the consolidated financial statement level, as well as the commentary information and the reporting templates.

## KPIs OF NON-FINANCIAL UNDERTAKINGS

## EUROPEAN TAXONOMY: SUMMARY TEMPLATE FOR THE KPI OF NON-FINANCIAL UNDERTAKINGS

## ENI GROUP - YEAR 2024

|   | TURNOVER                 |               | CAPEX                    |               | OPEX                     |               |
|---|--------------------------|---------------|--------------------------|---------------|--------------------------|---------------|
|   | Absolute amount in € mln | proportion %  | Absolute amount in € mln | proportion %  | Absolute amount in € mln | proportion %  |
| A. TAXONOMY - ELIGIBLE ACTIVITIES   |                          |               |                          |               |                          |               |
| <b>A.1. ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED)</b>                                   | <b>812</b>               | <b>0.9%</b>   | <b>1,222</b>             | <b>7.9%</b>   | <b>282</b>               | <b>6.5%</b>   |
| A.2. TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT TAXONOMY-ALIGNED ACTIVITIES) | 4,601                    | 5.2%          | 419                      | 2.7%          | 403                      | 9.4%          |
| TOTAL A.1 + A.2   | 5,413                    | 6.1%          | 1,641                    | 10.6%         | 685                      | 15.9%         |
| B. TAXONOMY-NON-ELIGIBLE ACTIVITIES   | 83,384                   | 93.9%         | 13,861                   | 89.4%         | 3,624                    | 84.1%         |
| <b>TOTAL A+B</b>  | <b>88,797</b>            | <b>100.0%</b> | <b>15,502</b>            | <b>100.0%</b> | <b>4,309</b>             | <b>100.0%</b> |

## SUMMARY TABLE OF TAXONOMY KPI 2024 - 2023

| (€ mln)  | TURNOVER      |               | CAPEX         |               | OPEX         |              |
|--|---------------|---------------|---------------|---------------|--------------|--------------|
|  | 2024          | 2023          | 2024          | 2023          | 2024         | 2023         |
| 3.17 Manufacture of plastics in primary form                                   | 230           | 59            | 4             | 745           | 38           | 5            |
| 4.1 Electricity generation using solar photovoltaic technology                 | 80            | 192           | 529           | 606           | 28           | 86           |
| 4.3 Electricity generation (wind)  | 159           | 168           | 48            | 138           | 46           | 25           |
| 4.8 Electricity generation from bioenergy                                      | 40            | 35            | 7             | 2             | 10           | 8            |
| 4.10 Storage of electricity  | 1             |               | 98            | 23            | 1            |              |
| 4.13 Manufacture of biogas and biofuels for use in transport and of bioliquids | 297           | 660           | 300           | 224           | 157          | 64           |
| 5.12 Underground permanent geological storage of CO <sub>2</sub>               |               |               | 146           | 145           |              |              |
| 6.15 Infrastructure enabling low carbon road transport and public transport    |               |               | 82            | 121           |              |              |
| Other  | 5             | 5             | 8             | 8             | 2            | 2            |
| <b>Total aligned</b>   | <b>812</b>    | <b>1,119</b>  | <b>1,222</b>  | <b>2,012</b>  | <b>282</b>   | <b>190</b>   |
| <b>Consolidated</b>  | <b>88,797</b> | <b>93,717</b> | <b>15,502</b> | <b>13,665</b> | <b>4,309</b> | <b>3,979</b> |
| <b>Taxonomy KPI</b>  | <b>0.9%</b>   | <b>1.2%</b>   | <b>7.9%</b>   | <b>14.7%</b>  | <b>6.5%</b>  | <b>4.8%</b>  |

Information and reporting templates provided for in Reg. 2021/2178 and relative amendments and additions are described within the [Reporting principles and criteria](#) chapter.



# Human rights for Eni

In order to describe Eni's commitment to social aspects and respect for human rights, as well as to highlight some of the aspects that are common to all social standards, the reporting on the specific social topics required by the ESRS is preceded by an introductory chapter on the human rights management system.

## POLICIES<sup>129</sup>

Eni's commitment to social aspects and respect for human rights is outlined in the [🔗 Code of Ethics](#), where the respect for the dignity of people and Human Rights is expected in Eni's activities and in those of business partners from whom Eni requires the same commitment from all those operating on its behalf. The [🔗 ECG Policy Respect for Human Rights in Eni<sup>130</sup>](#), illustrates the due diligence process according to the international standards, in particular the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises and it is recalled that Eni's commitment, management model and activities are developed taking into account the so-called salient human rights issues. These represent the most significant issues for Eni, identified by considering the business activities conducted, the operating contexts and the point of view of local and international stakeholders, while adopting a risk-based and compliance approach. The Policy outlines respect for and application of the principles set out by the International Labour Organization's (ILO) Tripartite Declaration on Multinational Enterprises and Social Policy which includes the fundamental labour rights enshrined in the ILO Declaration, as well as the rights set out in the international labour instruments for the promotion of decent working conditions. The Policy also defines how to engage stakeholders during all phases of the due diligence process, emphasizing an active collaboration perspective, and it describes the complaint mechanisms and other reporting channels, both at central and operational site level, aimed at ensuring that any possible violations of Human Rights are promptly seized, analyzed, managed and – if ascertained – addressed with remedial measures. If negative impacts on workers and communities are caused by Eni (or that Eni has contributed to cause), specific measures to verify the event and remedies are defined, also in collaboration with Third Parties. Eni expects Third Parties to also have adequate remedial mechanisms in place. Another significant

role is played by the "responsible contracting", a set of contractual standards, defined with a risk-based approach according to the type of contract, that are aligned with the provisions of human rights legislation, with particular reference to workers' rights. The Policy also outlines the commitment to respect the minimum age of access to employment, and the measures outlined by applicable international and national legislation on child labour, including its worst forms, as well as the rejection of any form of forced or compulsory labour, including any practice of labour exploitation, such as human trafficking, restriction of freedom of movement and seizure of identity documents. Eni expects all its business partners to commit themselves to complying with both the principles set out in the Human Rights policy and in the [🔗 Supplier Code of Conduct](#). Finally, the **internal regulatory framework** sets out Eni's commitment to promoting respect for human rights in the context of activities entrusted to, or conducted with partners and by stakeholders (for further information, see the [■ Policies: Code of Ethics and Regulatory System](#) chapter). In cases of potential divergence between local and international standards, the kinds of solutions sought are those that allow conduct based on international standards while taking into account local principles and ensuring the analysis and the assessment of the risks associated with possible violations, in order to monitor the level of risk and verify the effectiveness of the management actions identified.

## MONITORING HUMAN RIGHTS

Human Rights are also monitored by Eni's Board of Directors, who approved in 2023 the [🔗 ECG Policy Respect for Human Rights in Eni](#) and the [🔗 ECG Policy Zero Tolerance against violence and harassment in the workplace](#), and in particular, by the Sustainability and Scenarios Committee, to which the main updates made to the human rights management system and the activities carried out are presented every year. In 2024, Eni continued to assign incentives to management linked to human rights performance, assigning specific objectives to all managerial levels, including direct reports to the CEO, and continued a path of awareness and training through general learning courses dedicated to all Eni personnel, specific courses on topics and areas particularly exposed to risks of negative impacts, and practical workshops for suppliers on security and human rights issues.

(129) For further references, see [■ The Regulatory system](#), and Eni's [■ Reporting principles and criteria/Policies](#).

(130) The principles reported in this section refer to all 4 categories of stakeholders required by the ESRS: workers, workers in the value chain, communities and customers; as such these principles have been covered in this section in a transversal way.



## TRAINING ON HUMAN RIGHTS

|   | Units of<br>measurement | 2024               | 2023  |
|---|-------------------------|--------------------|-------|
| Human rights training hours                       | Hours                   | 955 <sup>(a)</sup> | 1,182 |
| Employees who have received human rights training | (%)                     | 78                 | 77    |

(a) In particular, in 2024 the fruitions has been limited given the fact that it was not a year characterized by massive campaigns.

## Human Rights Due Diligence

The path taken in recent years on the dissemination and consolidation of the culture of respecting human rights has strengthened the due diligence outlined by the Policy. The approach is based on a shared responsibility between several functions to properly manage the most important processes for human rights risks: human resources, procurement, security, sustainability and compliance. Due diligence is an ongoing process focused on the

full spectrum of human rights implications that Eni's activities could have, going beyond the list defined by the so-called "Salient Human Rights Issue". This multidisciplinary, multi-level model integrated into business processes and called the "human rights management model", is risk-based with the aim of identifying, preventing, mitigating and reporting negative impacts on human rights.

### GOVERNANCE AND COMMITMENT

Human rights have been incorporated into governance policies and processes, including through the structuring of appropriate training frameworks.

### DUE DILIGENCE

Eni has adopted a management system which includes a set of processes and tools to assess the most relevant issues, risks and impacts related to the respect for human rights.

### ACCESS TO REMEDY

Eni ensures adequate management of complaints through the "Grievance Mechanism" and the whistleblowing process.

A cornerstone of the human rights management model is the commitment of top management and all structures involved to guarantee the application of the principles to respect human rights and the appropriate integration into the various regulatory instruments at all levels. Another element is the stakeholder engagement as well as constant and adequate access to complaint mechanisms/reporting channels to ensure that any possible violations of Human Rights are promptly intercepted, analyzed, managed and, if ascertained, remedy measures are applied. This model is based on: (i) the mapping of the Salient Human Rights Issues and the Compliance Risk Assessment; (ii) the identification and assessment of potential risks or negative impacts<sup>(131)</sup> that Eni's activities, products or services may cause or contribute to causing, structuring adequate support safeguards<sup>(132)</sup>; (iii) the definition and implementation of measures to prevent or manage risks and impacts and the remedy measures where the negative impact has nevertheless occurred; (iv) periodic or specific

monitoring according to qualitative and quantitative indicators; (v) planning and reporting activities aimed at defining planning guidelines and providing a summary of activities and performance related to human rights.

## Salient Human Rights Issues

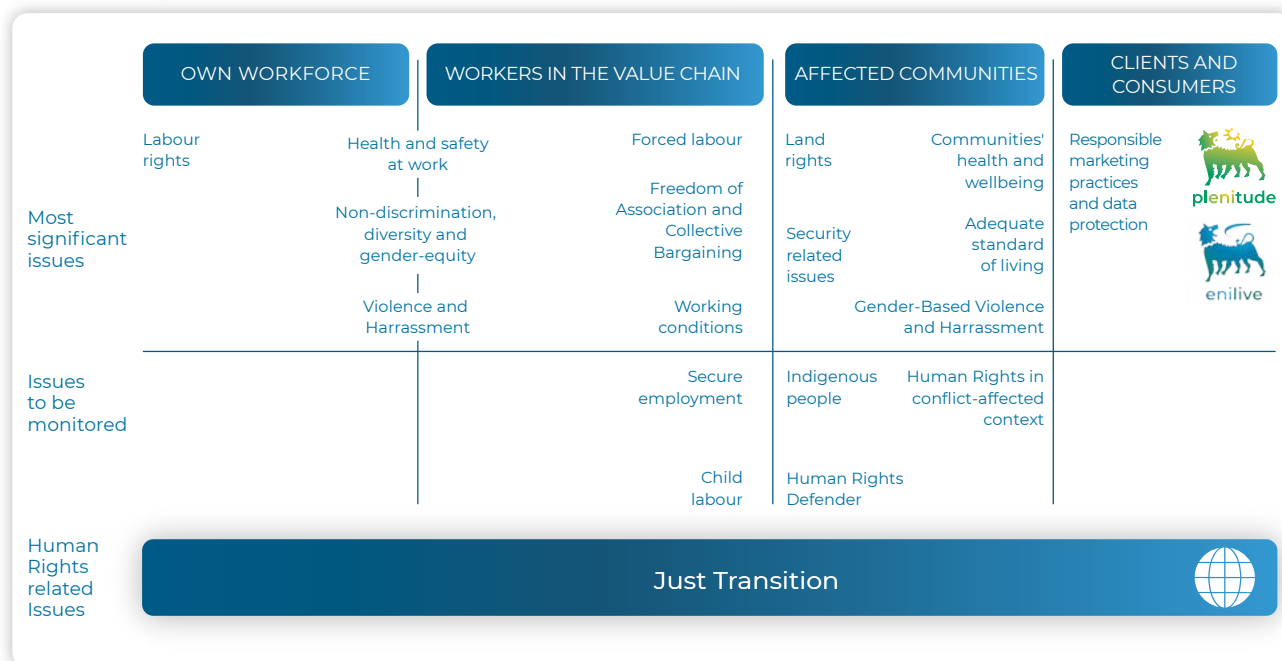
Eni's commitment, management model and activities conducted on human rights focus on the issues considered most significant for the company considering the business activities conducted and the contexts in which it operates. This set of issues, the so-called "Salient Human Rights Issue", identified for the first time in 2017, were updated in 2024, through the engagement of more than a hundred people from different Eni functions in dedicated workshops and through the engagement of some authoritative stakeholders. Following the analysis, 13 main issues were identified, divided between workers, communities and consumers, as well as 5

(131) The risks related to potential human rights violations are assessed from a dual perspective: (i) risk of causing (or contributing to causing) negative impacts, actual or potential, with reference to the UNGPs and OECD Guidelines; (ii) risk of incurring sanctions, significant financial losses, or reputational damage (so-called compliance risk).

(132) These assessments can also be conducted through the implementation of Human Rights Impact Assessment or Human Rights Risk Analysis (more detailed in the [Local Communities](#) chapter).



## WORKERS



additional issues to be monitored as they are relevant in relation to specific business activities or specific operating contexts.

To oversee these most significant issues, Eni has adopted **risk-based models**, which are discussed in depth in the following chapters, which make it possible to collect information on the operating context, evaluate them considering the specific activities carried out and business processes, seize potential risk elements and adopt appropriate prevention and management measures in consideration of the levels of risk themselves.

## Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms

Eni is committed to adopt, also in collaboration with Third Parties, remedial measures against any negative impacts caused (or that it has contributed to cause) as well as to make every effort to ensure a remedy if the impact is directly related to its activities, products or services. To this end, Eni commits to use its leverage on third parties to ensure that any negative impacts directly linked to their activities are remedied.

In line with this commitment and in accordance with international standards, Eni's human rights management model makes use of mechanisms for receiving complaints and concerns from stakeholders, individuals, communities or associations of individuals, with particular attention to the most vulnerable categories, through which supposed violations of human rights connected to Eni's activities can be reported

to the Company. These mechanisms allow the Company to intercept, assess, manage and – if the impacts are ascertained – put in place the appropriate remedial measures in a timely manner. In particular, two specific channels are available to stakeholders in the event of an alleged violation of human rights: (i) the Grievance Mechanism, i.e. the process of sending, managing and resolving grievances or complaints, in which grievances referring to Human Rights classified as "relevant" undergo a specific process of analysis and response (see [Local Communities](#)); (ii) the "whistleblowing Reports" allowing anyone, employees or third parties, to report, also confidentially or anonymously, problems relating to the Internal Control System or other matters in violation of the [Code of Ethics](#) (see the [Business Conduct](#) chapter). Regarding whistleblowing reports, during the year the investigation of 63 files<sup>133</sup> was completed, of which 32 referred to human rights, mainly relating to potential impacts on workers' rights and occupational health and safety. In particular, 64 assertions were verified, for 10 of which the reported facts were confirmed, at least in part, and corrective actions were taken to mitigate and/or minimise their impacts, including: (i) actions on the Internal Control and Risk Management System, relating to the implementation and strengthening of existing controls; (ii) awareness-raising actions on the issues of the Code of Ethics and the [Policy ECG Zero Tolerance against violence and harassment in the workplace](#); and (iii) actions against employees, including disciplinary measures, according to the collective agreement and other applicable national laws.

(133) Report file: it is a summary document of the investigations conducted on the report(s) (which may contain one or more detailed and verifiable assertions) in which the summary of the investigation carried out on the facts subject to the whistleblowing report, the outcome of the investigations carried out and any action plans identified are reported.



## WHISTLEBLOWING FILES ON HUMAN RIGHTS VIOLATIONS

|  | Units of<br>measurement | 2024                 | 2023                 |
|--|-------------------------|----------------------|----------------------|
| Whistleblowing files (assertions) on human rights violations - closed during the year  | number                  | 32 (64)              | 46 (62)              |
| <i>of which: employees<sup>(a)</sup></i>   |                         | 11                   | n.a.                 |
| Founded assertions   |                         | 10                   | 8                    |
| Unsubstantiated allegations / not verifiable <sup>(b)</sup> / not applicable <sup>(c)</sup> assertions                                       |                         | 54                   | 54                   |
| Inherent incidents of discrimination   |                         | 3 <sup>(d)</sup>     | 6 <sup>(d)</sup>     |
| Whistleblowing files (assertions) on human rights violations with potential socio-economic impacts on local communities                      |                         | 0                    | 0                    |
| Whistleblowing files (assertions) on human rights violations with potential impacts on health, safety and/or well-being of local communities |                         | 1 (2) <sup>(e)</sup> | 1 (2) <sup>(e)</sup> |

(a) Net of the 11 Whistleblowing Files referring to anonymous whistleblowing reports. The indicator is available from 2024.

(b) Assertions that do not contain circumstantial, precise and/or sufficiently detailed elements and/or, for which, on the basis of the investigative tools available, it is not possible to confirm or exclude the validity of the facts reported.

(c) Assertions in which the facts reported coincide with the subject of pre-litigation, litigation and ongoing investigations by public authorities. The assessment shall be carried out after the opinion of the Legal Affairs function or other relevant functions.

(d) The alleged episodes of discrimination have not shown any valid grounds.

(e) Both assertions relating to this whistleblowing file have not shown any valid grounds.

## Disputes and non-judicial remedy mechanisms

Eni also cooperates with other non-judicial remedies mechanisms, such as the one set and governed by the OECD Guidelines: the OECD National Contact Points in the various Countries. An integral part of the Due Diligence is the communication of the results obtained, also through the [Eni for](#) voluntary sustainability report and the one dedicated to the issue of human rights [Eni for - Human Rights](#). The company also assesses the status of legal proceedings against the organization, its subsidiaries or members of top management for violations of national or international laws relating to these matters; Eni does not in any way hinder the use of judicial or non-judicial mechanisms as well as institutional ones.

In 2024, Eni did not receive any convictions that have become final for violations of laws, regulations or other human rights law, regulations or other legal institutions.

## ENI'S OWN WORKFORCE

### POLICIES<sup>134</sup>

Eni's commitment to the enhancement of its people is included in the [Code of Ethics](#), which highlights how the skills of the people, at all levels, are fundamental for operational excellence. It reiterates the commitment to promote a culture based on the spread of knowledge, valuing everyone's behaviour and contributions, believing in the power of sharing, exchanging ideas and talking to each other. The Code also recognises the role of diversity and the promotion of a culture of plurality, emphasising the commitment to creating an inclusive work environment that respects everyone's dignity, taking into account the contribution of each one and recognising the strength of diversities. At the same time, Eni confirms its commitment to protecting the right

to privacy<sup>135</sup> of its people, processing personal data and confidential information in compliance with applicable laws and best practices. The [ECG Policy Respect for Human Rights in Eni](#) recognises and promotes the development of employees' skills and competences without discrimination, respecting the equality principle and fostering the appreciation of individuals' professionalism in an environment of equality and non-discrimination. Training is recognized as a fundamental lever for the development of knowledge, as a strategic element for the achievement of business targets, as well as a way to provide employees with the means to acquire, maintain and develop their skills. The policy underlines the prohibition of any form of discrimination, distinction, exclusion or preference based on the identification elements of the person that are not linked to the requirements necessary for the performance at work, which have the effect of cancelling or compromising equal opportunities or treatment in employment or professional environment. The commitment to achieve male and female worker equal pay for equal value, based on objective criteria, is also reaffirmed. In addition, the policy specifies the adoption of measures and initiatives aimed at ensuring the "work-life balance" and organizational well-being, promoting support for parenthood, protecting maternity, and recognizing conditions not inferior to those provided for by international legislation on maternity and paternity to all employees in the Countries where Eni operates. Additional measures to facilitate parenthood are also promoted, guaranteeing the right to non-discrimination of people with family responsibilities. Eni guarantees and promotes the right of workers and employers to set up trade unions at their own free choice, as well as the right to collective bargaining. In addition, the [Policy ECG Diversity & Inclusion](#) recognizes the commitment to avoid incidents of discrimination in relation to: color, sex, religion, ethnic origin, political opinion, social origin or national ancestry, disability status, gender identity, sexual orientation, social status, age or any other form of diversity contemplated by international law. This policy

(134) For further references, see [The regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).

(135) For Eni's actions on the subject of privacy, see the chapter [Risk factors and uncertainties](#).



supports the development of an international business based on equity, dignity, equal opportunities, spread of ethical values, enhancement of diversity, integration and non-discrimination, and promotes gender equality and women's empowerment at work, in business practices and in relations with the communities of the Countries in which Eni operates. The commitment to ensure that its communication initiatives, including commercial ones, promote an inclusive vision of the Company itself and avoid the use of gender stereotypes is reaffirmed. In addition, the desire to guarantee a physically and socially fair working environment is made explicit, to make each person able to have equal access to company resources and opportunities based on the principle of equal opportunities and non-discrimination and to remove cultural, organizational and material obstacles that limit people's freedom of expression and their full valorization. The [Policy ECG Zero Tolerance against violence and harassment in the workplace](#) specifically prohibits, without exceptions, all forms of violence and harassment at work within the company. In addition, in the **internal regulatory framework** the management processes related to the workforce are defined.

## TARGETS and COMMITMENTS

Eni's targets and commitments related to Human Capital are defined on the basis of the evolution of the personell and in line with the medium/long term strategy of the Just Transition path, while also considering the trend of historical and forecast data of employment plans; if a target is achieved, it is reassessed and modified accordingly. These indicators are monitored quarterly through standard reporting shared with the managers of the different businesses and, consequently, any corrective actions are defined/implemented. The main employment data and related trends are also shared with the workers' representatives at the European Works Council and the Global Framework Agreement, in order to present and comment on their developments. In addition, the evaluation and monitoring of the indicators underlying the targets is carried out on a quarterly basis to verify that the trends are in line with the development to plans, to report any critical issues and to set up any corrective actions, where necessary.

| Target  | Target year | 2024 Performance                           | Base year and relative reference value | Notes (scope, methodology, evidence)                |
|---|-------------|--|--|---|
| +4 p.p. of the female population  | 2030        | +3.8 p.p.                                  | 2020: 24.6%                            | Relative target<br>Scope: consolidated line-by-line |
| +3.8 p.p. female personnel in positions of responsibility (Senior managers and Middle managers) | 2030        | +3.4 p.p.                                  | 2020: 26.6%                            | Relative target<br>Scope: consolidated line-by-line |
| +6.5 p.p. population under 30   | 2030        | +3.5 p.p.                                  | 2020: 6.7%                             | Relative target<br>Scope: consolidated line-by-line |
| +2 p.p. presence of non-Italian employees in positions of responsibility                        | 2030        | -1.2 p.p. <sup>(a)</sup>                   | 2020: 18.6%                            | Relative target<br>Scope: consolidated line-by-line |
| +15% training hours <sup>(b)</sup>  | 2028        | <i>in slight decrease compared to 2023</i> | 2024: 1,027,822                        | Relative target<br>Scope: consolidated line-by-line |

(a) The reduction in the 2024 performance was affected by M&A transactions of major companies such as, for example, Nigeria.

(b) The reduction in the target from 20% to 15% is affected by the efficiency recovery and cost containment initiatives launched in 2024.

## MATERIAL IMPACTS, RISKS<sup>136</sup> and OPPORTUNITIES (IROS)

Eni considers human capital<sup>137</sup> as the core of its strategy<sup>138</sup>, promoting the well-being of workers through welfare initiatives and supporting the development of employees' skills aimed at professional growth. The expected evolution of business activities and the labour market, the new strategic directions and the challenges posed by technological changes involve an important commitment to increase the value of human capital over time through upskilling and reskilling initiatives, aimed at enriching or reorienting the skill set and attracting talent, taking advantage of the opportunity given by the new skills on the market in order to develop emerging technologies and businesses. At the same time, in order to monitor the potential negative impacts that the

activity may produce on its workers, Eni places at the center of its actions the constant respect for human rights in labour matters (e.g. working hours, adequate wages, freedom of association and collective bargaining and safety in employment). The sector, in fact, often has complex working conditions, characterized by night shifts and prolonged working hours shifts, to ensure business continuity. In addition, particular attention is paid to the protection of non-discrimination, respect for equal treatment and opportunities (in hiring, training, professional career and career progression stages) and the prevention against violence and harassment of a physical, psychological or verbal nature, including gender-based violence. Exploration, development, and production are often carried out far from populated areas, often using rotational arrangements between periods of several

(136) Disclosure relating to risks on company's workforce is reported in the [Health & Safety](#) chapter.

(137) Represented by all direct employees operating in Italy and abroad. Direct employees do not include contractors who are instead considered as workers in the value chain.

(138) For further information on how the impacts related to own employees are connected and taken into account in the definition of the company's strategy and business model, see the chapter [Stakeholder Engagement](#).

days or weeks. In addition, although workers in the sector are traditionally represented by trade unions and covered by collective bargaining agreements, some resources operate in Countries where these rights are limited and therefore are more exposed to the risks of intimidation or unfair treatment. In addition, the conditions, workplaces, skills and types of tasks performed within the activities of the sector could be the cause of potential conditions of discrimination, as well as be characterized by a prevalent presence of certain categories of workers (e.g. men). Cases of discrimination may relate to the ethnicity, gender, sexual orientation, disability, religion, nationality and status of workers. Finally, the decarbonization process will be accompanied by an industrial reorganisation that will consist of the transformation of some production sites, such as basic chemicals and traditional refining, with a possible impact on the workers in its workforce. For material risks, see the [Health and Safety](#) chapter, except for the transversal risk of Cyber Security detailed in the [Business Conduct](#) chapter.

## EMPLOYEE ENGAGEMENT<sup>139</sup>

### Industrial relations

A central role in building the relationship with workers and protecting their rights is represented by Eni's industrial relations model, managed by a dedicated function. At the national level, Eni involves its workers both through the meetings provided for by the INSIEME Protocol, such as the Strategic Committee, which deals with issues such as the sale of business units, staff rationalization and generational turnover, reconversion of production sites and significant organizational reviews (every six months or when necessary), and through other tools such as the Bilateral Commission on Agile Work, which verifies the application of the agreement on Agile Work, analyses its impacts on the organization of work, manages local critical issues and periodically reports the results to the signatory parties. On an international level, Eni established its European Works Council<sup>140</sup> (EWC) in 1995, which focuses on issues relating to business plans/investments/acquisitions or disposals, employment prospects, health and safety at work, environmental policies and sustainability. It includes representatives of Italian and European Eni's workers, representatives of Italian trade unions, and a representative of the European trade union: the IndustriALL European Trade Union. Another European tool is the European Observatory for the Health, Safety and Environment of Workers, where data and analysis and management tools on the following topics are shared: injuries, accidents and occupational diseases, regulatory evolution, environmental and health aspects, monitoring of climate issues and energy efficiency. An annual meeting of the EWC and the European Observatory for

the Health, Safety and Environment of Workers and at least three annual meetings of the EWC Select Committee with the competent functions of Eni are planned. Finally, the Global Framework Agreement on International Industrial Relations and Corporate Social Responsibility (GFA), which is international (non-European) and is set to be renewed in 2025, annually involves international and European Eni workers' delegates, representatives of Italian trade unions and a representative of the global trade union IndustriALL Global Union. The Agreement represents a concrete commitment by Eni to steer sustainability guidelines, to define strategies based on the principles of integrity and transparency, to promote the fight against corruption, respect for human rights, labour, health and safety of people for the protection of the environment and sustainable development. For each meeting, detailed documentation is shared and the minutes, signed by both parties, are drafted to include what has been agreed upon and discussed. The engagement of workers with reference to issues related to sustainable transition is also achieved through the use of tools such as the INSIEME Protocol, which establishes the birth of a new model of industrial relations, to effectively accompany the transformation processes and to share a Generational Pact that allows the renewal and updating of professional skills and the construction, together with stakeholders, a clear regulatory framework, favourable to investment and able to combine economic-financial sustainability with the environmental and social ones.

### Other engagement initiatives

Among the initiatives to engage and listen to Eni's people, there are those, regarding Welfare, to collect relevant insights on the needs of Eni employees (starting from the under 35s), or the analysis of the corporate climate as well as targeted listening initiatives on certain matters (D&I). Considering the actions taken towards the most vulnerable and least represented people, Eni has launched the following actions: (i) periodic training dedicated to all people to develop greater awareness of the culture of inclusion; (ii) specific training aimed at acquiring the necessary skills to manage possible unconscious biases in the selection process and in management interviews; (iii) internal D&I communication and awareness initiatives at the headquarters and operational sites in Italy and abroad; (iv) listening initiatives to measure the impact and corporate sensitivity of D&I initiatives and to generate and design new initiatives with a particular focus in 2024 on disability and intergenerationally; (v) assessment of the D&I maturity at subsidiaries abroad through listening activities aimed at defining a plan of common and specific initiatives for individual realities; (vi) consolidation of a D&I community both within the company through the engagement and active participation of

(139) See the chapter [Stakeholder Engagement](#) for further information.

(140) Workers' representative entity provided for by European Directive 94/45/EC, which promotes transnational information and consultation of workers in Community-scale companies and groups.



Eni's people and externally through partnerships and networking initiatives (e.g. Women X Impact) and membership in national and international associations focused on D&I issues (e.g. Parks and Valore D); (vii) promotion of a culture of inclusion through external communication actions, awareness-raising in schools (with the Eniscuola and Valore D projects), content on digital platforms (e.g. podcasts and webinars powered by Eni) and participation in external events. All initiatives are coordinated by a corporate function dedicated to D&I topics.

## Evaluations and Feedbacks

In its internal procedures, the company promotes and enhances the continuous and widespread use of feedback, which allows the expression of fundamental values of its culture. Punctual, objective, constructive feedback tracked through company systems contributes to the development and engagement of Eni's people not only during institutional processes (performance evaluation), but also on an ongoing basis and whenever the need for mutual discussion and listening between manager and employee arises. The evaluation process is based on objectives that are consistent with Eni's strategy, challenging and balanced in relation to the assigned role. With regards to the Executives and Senior Managers, business and behavioural objectives are set, while for the others there are qualitative/quantitative objectives consistent with the responsibilities held and behavioural objectives that can be adapted during the year on the basis of exchanges between manager and collaborator.

## Whistleblowing and remediation mechanisms

The tools, regulated within the company regulatory system, that can be used in the event of an alleged violation of the [Code of Ethics](#) and/or of the human rights<sup>141</sup> and health and safety provisions for its workers are: the Grievance Mechanism and whistleblowings. For further details on these channels and for the remedy management approach and any actions taken in the year, please refer to the [Human Rights for Eni](#) chapter and, for whistleblower protection measures, to the [Business Conduct](#) chapter.

## ACTIONS TAKEN ON MATERIAL IROs

Eni's business model is based on internal skills, an asset in which Eni continues to invest to ensure alignment with business needs, in line with its long-term strategy. The evolution of the business involves an important commitment to increase the value of human capital over time and with this in mind, Eni is committed to giving priority to workers' programs, in line with the Just Transition path, with the aim of supporting their relocation in new or transformed activities. In 2024, initiatives aimed at disseminating and assimilating a new model of skills and behaviours aimed at

effectively managing the transition into processes and internal culture continued. Eni has also launched internal processes to revise professional models and update skills, both soft skills and hard skills, to encourage the growth of more complete and integrated professionalism. This includes training initiatives on topics such as circular economy, decarbonization and renewable energy, aimed at ensuring continuous upskilling. With regard to the management of its resources, Eni has launched a new resource management model that defines development paths, throughout the company lifecycle, diversified and consistent with the new business model in order to enhance the various professionalism and talents in an inclusive logic, promoting motivation, a sense of belonging and proactivity of people. With regard to the impacts on workers related to the industrial conversion process, Eni commits to: (i) continue the process of skills replacement in order to support Eni's transformation in line with the decarbonization objectives and targets defined as part of the energy transition process; (ii) pursue the development of the satellite model, a recovery of organizational efficiency on the transversal functions in support for the business and the industrial reorganization of traditional business sectors, also through initiatives aimed at enhancing the internal skills available with appropriate training and internal mobility programs. Regarding opportunities, looking at the labor market, Eni is constantly committed to attracting the best professionals, with distinctive characteristics and oriented to the different needs of the business lines. The required professional skills change over time, in relation to the evolution of the company strategy and it is necessary to have full correspondence between these dynamics over time in order to ensure the constant updating of professional profiles with respect to the needs expressed by the different business areas. With a view on continuous engineering and upskilling of competences, the implementation of structured orientation programs is therefore guaranteed, to accompany new generations towards a more informed choices regarding their training/professional path. Talent Attraction plans are also in place, whether vertical and linked to specific sectors, for both expert and junior profiles, as well as initiatives aimed at preparing pools of people who can best represent the Strategy and the businesses in the various contexts of exposure of the Eni brand (Global Ambassador Programme). Finally, in terms of communication, Employer Branding actions implemented through recruiting campaigns on the main digital and traditional media channels remain central. With reference to the material impacts, in 2024 following ascertained cases of violence and harassment of a physical, psychological or verbal nature (detected through a whistleblowing channel), Eni intervened, with dismissal and suspension from work, both against the perpetrators of the harassment and against other employees whose behavior had contributed to compromising the work environment.

(141) For disclosure of the number of serious human rights incidents related to the company's workforce, please refer to the [Human Rights for Eni](#) chapter.



## Eni's Human Rights Management Model – Eni's People

Starting from 2020, a **risk-based model** was introduced for assessing the protection of human rights in the workplace aimed at segmenting Eni companies on the basis of quantitative and qualitative parameters that capture the specific characteristics and risks of the Country/operating context and that relate to the human resources management process (including the fight against all forms of discrimination, gender equality, working conditions and freedom of association and collective bargaining). This approach identifies any areas of risk, or improvement, for which specific actions to be monitored over time should be defined. During 2024, the application of the model in the subsidiaries of the Energy Evolution Department carried out in 2023 was examined in depth and a follow-up was carried out in the upstream business companies interested by the application of the model in 2021. A set of standard mitigation actions deriving from the application of this risk-based model for assessing the protection of human rights in the workplace has also been disseminated to all Eni companies.

## Work-life balance and Welfare

Eni has adopted a corporate welfare and benefits system that includes a set of services, initiatives and tools, aimed at improving the well-being of employees. Eni's Smart Working (SW) model (agreement signed in October 2021) provides for all employees: in Italy, 8 days/month for office locations and 4 days/month for operational sites, as well as numerous welfare options to support not only parenthood and disability but also the health of people or their cohabiting family members, further enriched with an option to manage cases of temporary, sudden and unplannable health problems of a cohabiting member of the family unit. The SW model has also been progressively adopted in other Countries, in line with local regulations. Furthermore, with reference to parenting issues, in all the Countries where it operates, Eni has continued to recognize as a minimum treatment in the absence of a more favorable applicable legislation: 10 working days paid at 100% to both parents, a minimum of 14 weeks of leave for the primary carer as per the ILO agreement and the payment of an indemnity equal to at least 2/3 of the salary received in the previous period. As far as welfare services are concerned, Eni offers a plan of initiatives that respond to needs concerning the family environment (from recreational and educational services for children, to assistance for non-self-sufficient family members), the promotion of health and psychophysical well-being (dedicated prevention initiatives, psychological help desk and availability of affiliated sports facilities) and income support interventions (subsidized loans, supplementary pension and supplementary health care). The year 2024 was characterized on one hand by the consolidation of the new service lines in the field of parenting activated following their definition in the NOI Protocol signed with the trade unions, and on the other hand by the launch of a study and analysis of the existing offer, including through benchmarks, to identify actions to redefine and improve the actual measures.

## Diversity & Inclusion

Eni's approach to Diversity & Inclusion (D&I) is based on the fundamental principles of non-discrimination, equal opportunities and inclusion of all forms of diversity, as well as integration and work-life balance. The main areas of action are: (i) **Women's empowerment**: actions to attract female talent, through the organisation and promotion of initiatives for students to orient themselves towards STEM subjects (Science, Technology, Engineering and Mathematics), with a focus on gender equality and the growing and effective testimony of internal Role Models and Ambassadors, for equal opportunities in the work environment of the energy sector. In 2024, Eni maintained its collaboration with Valore D and, in the procurement area, with Open-ES for the dissemination of D&I strategies in the supply chain with a focus on SMEs. In 2024, the design of an initiative called WIP (Women In Power) was completed, which will be fully implemented in the first half of 2025. This initiative concerns a specific training intervention aimed at promoting professional development. Eni has renewed its partnership with Woman X Impact, the annual summit dedicated to issues related to gender equality, female leadership and self-branding through female networking. Among other activities, in-person events were held at the headquarters in Rome and Milan in which the role of women in STEM fields, the female leadership styles and the importance of networking were discussed; (ii) **Gender Equality and Parenthood**: following Eni's adoption of the Corporate Governance Code for companies in favour of maternity, the Inter-Functional Working Table was established in 2024 aimed at introducing new measures for parenting, their effective communication to Eni's people and formalising a Gender Equality Management System; (iii) **Intercultural**: workshops were organised at some Eni subsidiaries abroad to raise awareness on D&I issues, also through the storytelling of local people and the engagement of external testimonials; (iv) **Intergenerationality**: in addition to the listening initiative carried out in 2024, an event was promoted focused on retracing the values and work drivers that unite and distinguish the needs of people of different generations and how people of different ages relate to each other beyond their formal roles in the company; (v) **Sexual orientation and gender identity**: awareness-raising activities on the issue continued; in particular, an internal event was organized on the issues of Sports and Coming Out; (vi) **Disability and fragility**: in addition to the listening initiative on people with disabilities, work continued to define a strategy for the attraction, management and development of people with disabilities, and guidelines for the accessibility of buildings and digital accessibility. In addition, Eni has continued its collaboration with Auticon and started a collaboration with the Italian Dyslexia Association, testifying to Eni's growing commitment to neurodivergence. In 2024, a communication plan was also implemented aimed at disseminating the [D&I Policy](#) among employees also in operational contexts in Italy and abroad. The D&I Policy has also been adopted by Eni's companies and subsidiaries as required by Eni's regulatory system.



## Training and development

Eni continues to consider training a fundamental lever in supporting the company in the process of change, in line with the strategies defined in the field of energy transition and digital transformation. Targeted training interventions that cover all aspects of technical-professional, transversal, personal growth at 360 degrees, through appropriate upskilling and reskilling interventions and in the optimal mix of face-to-face and distance training, remain the key to building the skills of the future in the directions defined by the company's objectives. The effectiveness of the training modules is measured through end-of-course questionnaires that employees complete to assess the achievement of the training objectives. Therefore, where applicable, at the end of the courses there are: in the specialized

technical courses, an end-of-course learning test; in the compulsory courses in the field of safety, practical or theoretical tests for passing the course; in the language courses, final tests to certify the achievement of the expected level; in the behavioural courses, self-assessment questionnaires on the skills acquired. With regard to the relevant expenses in 2024 in Eni's workforce (excluding those relating to labour costs explained in the Financial Statements in ► [Note 30 Costs - Purchases, services and other charges](#) of the Consolidated financial statements), total training expenses amounted to €31.3 million (of which €0.32 million for D&I activities) and are expected to amount to €139 million over the next four years of which €1.7 million for D&I initiatives. For other significant expenses relating to Eni's workforce, see the [Health and Safety](#) chapter.

### TRAINING AND DEVELOPMENT EXPENDITURE<sup>(a)</sup>

|   | Units of measurement | 2024  | 2023    |
|---|----------------------|-------|---------|
| Average training and development expenditure per full-time employee | (€)                  | 976.2 | 1,005.1 |

(a) The items in the table are included in Eni's 2024 consolidated financial statements, in the item in ► [Note 30 "Costs - Purchases, services and other charges"](#).

## METRICS<sup>142</sup>

### EMPLOYMENT, DIVERSITY, TRAINING AND INDUSTRIAL RELATIONS

|  | Units of measurement | 2024   | 2023   |
|--|----------------------|--------|--------|
| Employees (head count)   | (number)             | 31,669 | 32,321 |
| Men  |                      | 22,695 | 23,472 |
| Women  |                      | 8,974  | 8,849  |
| Employees by geographic area                                     |                      |        |        |
| Italy  |                      | 21,688 | 21,336 |
| Africa   |                      | 1,769  | 2,711  |
| Americas   |                      | 1,328  | 1,930  |
| Asia   |                      | 2,515  | 2,506  |
| Australia and Oceania  |                      | 103    | 101    |
| Rest of Europe   |                      | 4,266  | 3,737  |
| Permanent employees  |                      | 30,858 | 31,383 |
| Women  |                      | 8,763  | 8,595  |
| Men  |                      | 22,095 | 22,788 |
| Fixed-term employees   |                      | 811    | 938    |
| Women  |                      | 211    | 254    |
| Men  |                      | 600    | 684    |
| Atypical temporary employees (agency workers, contractors, etc.) |                      | 1,433  | 2,793  |
| Women  |                      | 526    | 684    |
| Men  |                      | 907    | 2,109  |
| Employees with full-time contracts                               |                      | 31,248 | 31,945 |
| Women  |                      | 8,623  | 8,516  |
| Men  |                      | 22,625 | 23,429 |
| Employees with part-time contracts                               |                      | 421    | 376    |
| Women  |                      | 351    | 333    |
| Men  |                      | 70     | 43     |
| Local employees abroad   | (%)                  | 85     | 86     |

(142) For the methodology and scope of consolidation, see the chapter [Reporting principles and criteria](#).



## EMPLOYMENT, DIVERSITY, TRAINING AND INDUSTRIAL RELATIONS

|   | Units of measurement | 2024        | 2023        |
|---|----------------------|-------------|-------------|
| Non-Italian employees in positions of responsibility  |                      | 17.4        | 19.1        |
| New hires with permanent contracts  | (number)             | 2,616       | 1,949       |
| Terminations of permanent contracts   |                      | 2,813       | 1,942       |
| Rate of turnover  | (%)                  | 8.8         | 6.2         |
| Non-employees   | (number)             | 1,433       | 2,793       |
| Employees by age groups   |                      |             |             |
| Under 30  |                      | 3,185       | 3,240       |
| 30-50   |                      | 17,781      | 18,427      |
| Over 50   |                      | 10,703      | 10,654      |
| Employees in positions of responsibility (Senior managers <sup>(a)</sup> )                            |                      | 926         | 941         |
| Women   | (number) (%)         | 173 (18.68) | 171 (18.17) |
| Men   |                      | 753 (81.32) | 770 (81.83) |
| Employees covered by performance assessment tools (senior managers, middle managers, young graduates) | (%)                  | 94          | 85          |
| Employees covered by annual review (senior managers, middle managers, young graduates)                |                      | 98          | 95          |
| Women   |                      | 97          | n.a.        |
| Men   |                      | 99          | n.a.        |
| Training hours  | (hours)              | 1,027,822   | 1,154,495   |
| Average training hours per employee   |                      | 32.1        | 36.7        |
| Women   |                      | 27.1        | 27.5        |
| Men   |                      | 34.0        | 40.1        |
| Employees who are entitled to parental leave  | (%)                  | 100         | 100         |
| Employees who have taken parental leave   |                      | 3           | 3           |
| Women   |                      | 4           | 4           |
| Men   |                      | 3           | 3           |
| Gender pay gap  |                      | 6.8         | 3.4         |
| Total remuneration ratio  | (number)             | 157         | 180         |
| Employees covered by collective bargaining  | (%)                  | 83.50       | 86.95       |
| Italy <sup>(b)</sup>  |                      | 100         | 100         |
| Abroad  |                      | 40.10       | 56.28       |
| Employees in trade unions <sup>(b)</sup>  |                      | 36.74       | 36.65       |

(a) Reference is made to all the company's employees who, due to their competence and managerial skills, hold roles of high responsibility, autonomy and decision-making power such as promoting, directing and managing the achievement of the company's objectives.

(b) Within the European Economic Area, only Italy is considered as it is identified as the only Country in which Eni operates that has at least 50 employees and represents at least 10% of the total number of workers.

## Employment and Diversity &amp; Inclusion

The decrease in overall employment is attributable to M&A transactions (disposals in the Enilive and Upstream areas partially offset by the acquisitions of the Aten Oil and Neptune groups) and to the balance of operating efficiency. Overall, 2,981 hires were made in 2024 (+13.3% approx. vs. 2023) of which 2,616 with permanent contracts (+34.2% approx. vs. 2023). About 53% of permanent hires involved employees up to 30 years of age. 3,183 resolutions were made (902 in Italy and 2,281 abroad), of which 2,813 were employees with permanent contracts, with an incidence of female staff equal to approx. 36%. 71% of employees with permanent contracts who terminated their employment in 2024 were under the age of 50. Eni's transformation process, which requires a strong turnover of skills to support the energy

transition, is also highlighted by the trend in the turnover rate, which in 2024 increased by 2.6 p.p. compared to 2023, the year in which the most significant value in the last 4 years was recorded. The average presence of local staff abroad is substantially constant and on average around 86% in the last three years. The average age of Eni's people worldwide is 44.9 years (45.6 in Italy and 43.4 abroad), substantially in line with 2023 (44.7) thanks to the significant turnover work and the recruitment program of innovative professionals and junior figures. The figure for non-employees varies according to the business needs and operational flexibility required, i.e. their transformation into stable contracts. Compared to 2023, the number of non-employees decreased mainly due to M&A transactions.



## Industrial relations

In Italy, 100% of employees are covered by collective bargaining according to current regulations. Abroad, in relation to the specific regulations operating in the individual Countries of presence, this percentage stands at 40.10%. In Countries where employees are not covered by collective bargaining, Eni ensures in any case full compliance with international and local legislation applicable to the employment relationship as well as some higher standards of protection guaranteed by Eni throughout the group through the application of its company policies worldwide.

## Training and Development

2024 values are comparable with the previous year, although recording a reduction also in line with a rationalization of training plans. In particular, there was a decrease of 11% in the total hours completed and 12.5% in the average training per employee. The average expenditure has also been contained by approximately 3%. Of more than 1 million hours of training in the year, 76% were taken by men and 24% by women, achieving a distribution consistent with that of the Eni population, with an increase in fruition by women from 20% in 2023 to 24% in 2024, as an effect of the commitment to supporting the presence and development of female professionals in the company. As far as performance evaluation is concerned, in 2024 a complete coverage of senior managers is confirmed and the trend among middle managers and young graduates increased, reaching a total of 94% of the population of executives, middle managers and young graduates. This rise is due to the increasingly consolidated use of the new rolling objectives for the non-managerial population during the year. For the same group, also with regard to the annual review, there is an increasing trend with an overall level of 98%. In terms of gender representation, the annual review process is substantially in line with the general trend and no significant differences emerge.

## Adequate remuneration and wages

With regards to ratio between the remuneration of the CEO/DG and the median of employees (total remuneration ratio), the indicator in 2024 is down compared to 2023 and is equal to 157 for total remuneration and 34 for fixed remuneration. The Gender Pay Gap, i.e. the pay gap between men and women globally, is +6.8%. The increase compared to 2023 depends on the acquisition/divestment of foreign companies and may be influenced by objective non-discriminatory factors not considered by the indicator, such as: level of professional category and role held, seniority in the role, working hours and conditions (e.g. shifts and related allowances), individual performance, as well as the number and distribution of the female population in the different Countries and professional categories compared to the male population. Therefore, Eni carries out further analyses, all the objective factors mentioned above being equal, in order to highlight any unjustified gaps and take

appropriate corrective actions. In particular, in 2024 the analysis of the same level of role/seniority showed an average global pay gap of 2.1%. In order to guarantee decent wages, Eni applies, in each Country in which it operates, reference wage policies that are well above the legal/contractual minimums, as well as the 1st decile of the local wage market, and annually verifies the salary positioning of its people, adopting any corrective actions.

The references that Eni uses for the comparison are the minimums established by law or by contract in each Country and the market minimums of medium-large local companies, which are well above the poverty thresholds established by Eurostat for the European Union and by the Wage Indicator for other Countries. More details on total remuneration ratio, pay gap and minimum wage indicators and Eni remuneration policies are reported in the [Report on the 2025 Remuneration Policy and remuneration paid 2024](#).

## HEALTH & SAFETY

### POLICIES<sup>143</sup>




Eni's commitment to the health and safety of its workforce is included in the [Code of Ethics](#), where the importance of promoting people's health and safety is underlined. Health and Safety are protected in compliance with the highest international standards, specific laws and regulations of the Countries, with a view on continuous improvement and empowerment of all company levels, to ensure a management based on the principles of precaution, prevention, protection and risk management. Suitable tools are provided for the prevention and protection of any negligent or malicious conduct, including by third parties, which could cause direct or indirect damage to Eni's People and/or to the company's tangible and intangible resources. A clear and transparent flow of information is ensured to Eni's People, the entire community and partners regarding the necessary preventive and protective measures to be implemented in order to eliminate (and when this is not possible, mitigate) risks and criticalities. Stemming from processes and activities the [Policy ECG Respect for Human Rights in Eni](#) confirms the commitment of the Code of Ethics to ensure a safe and healthy working environment for all workers and to respect relevant principles, also making the integration of the gender perspective into the operating models explicit, with the aim of reaching continuous improvement and empowerment of all company levels. The promotion of health and physical, mental and social well-being of its people is ensured through a management system that includes occupational medicine and industrial hygiene, medical assistance and management of medical emergencies and health promotion, while ensuring the adoption of a gender perspective, as well as particular attention to situations of greater fragility and activities to protect and promote the health of communities. Finally, the **internal regulatory framework** defines the commitment and operating methods to

(143) For further references, see [The regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).

ensure health surveillance and prevent work-related diseases, the clustering method based on health risk and related obligations, and the procedures for managing health emergencies. Safety issues are included in the **internal HSE regulatory framework** which, among other issues, addresses the commitments and operating methods to develop suitable prevention and protection measures to protect personnel, suppliers and owned assets, as well as their constant maintenance of efficiency. This legislation framework deepens the management system which includes, in addition to occupational safety and industrial hygiene, process safety with the aim of preventing risk of significant accident with the application of high management and technical standards, product safety, emergency management and the promotion of a safety culture.

## TARGETS AND COMMITMENTS

In line with last year, the targets and commitments on health and safety issues are linked to the Policies guidelines, and refer specifically to activities to protect the psycho-physical health of workers with reference to the work environment and situations of fragility and the safety of people. These targets are shared with the departments responsible for achieving them, and the Safety target (with reference to a specific indicator defined by Eni considering the TRIR formula) is part of the variable incentive for the CEO and management. The targets and commitments are monitored on a semi-annual basis through the Health, Safety, and Environment review processes, as well as more frequently through the use of specific metrics to ensure appropriate interventions in cases of misalignment with expected trends.

| Target  | Target year | 2024 Performance |   | Base year and relative reference value | Notes (scope, methodology, evidence)  |
|---|-------------|------------------|---|--|---|
| Maintenance of the Total Recordable Injury Rate (TRIR) <sup>(a)</sup> ≤ 0.40  | 2025-28     | 0.48             |  | 0.43 (average last 3 years)            | Relative target; Includes both own workers and VC contractors                       |
| 85% employees with access to psychological support service  | 2028        | 74%              |  | 2022: 68%                              | Relative target<br>Scope: consolidated line-by-line % of total employees            |
| 150 sensors tested, including Italian off-shore sites and abroad for digital monitoring of indoor healthy working environment | 2028        | 99               |  | 2022: 0                                | Relative target<br>Scope: consolidated line-by-line<br>Applicable to operated sites |

(a) For the methodological note, the target and how to achieve the latter, please refer to the section [Metrics: methodologies](#). This target continues to be defined on the basis of the boundary on which Eni reported before the entry into force of the ESRS standards, which led the company to redefine the operated boundary (see [Reporting boundary](#)) in order to continue to direct safety actions even towards companies in which Eni is not actually the operator.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IRO's)

Work-related injuries and accidents have the potential to have a major impact on individuals (Eni's own workforce and value chain workers), assets, environment and surrounding communities. The presence of goods and assets aimed at producing oil, gas and energy, often in remote locations, makes it necessary to have an effective risk management to protect the **safety** of people and operations also in relation to potential accidents and failures of assets and infrastructure. The primary focus, in fact, is the identification and mitigation of potential risks/hazards that could have an impact on the workforce (its own workers and those in the value chain), the environment or communities. As far as process safety is concerned, reference is made to: major process accidents, such as fires or explosions, spills or releases of hazardous substances and asset integrity accidents with personal injury; accidents associated with activities not directly related to process, such as road and rail transport services, naval transport, refuelling stations, gas distribution networks, LPG networks; blow out following the occurrence of an uncontrolled flow of hydrocarbons inside the wells. For risk mitigation and management, a risk-based safety management system has been set up to prevent major accidents. All events, including near misses and unsafe conditions/unsafe acts, are reported, analyzed and monitored with the necessary corrective and preventive actions. This system is

continuously improved, taking into account the events that occur in Eni's operations and in the industry. All companies at significant risk are covered by ISO 9001, 14001, 45001 and 50001 certification or have planned to achieve it. This confirms the fact that the safety of employees is an essential value for Eni and it is therefore essential to maintain safe working conditions for all individuals under maximum supervision, achieving 100% safe operations. The **health and well-being of workers** is also of inestimable value to the company, and is protected and promoted in order to safeguard its people and to ensure business continuity. With regards to health-related impacts, they concern occupational diseases of own workers and workers in the value chain, i.e. pathologies that may have a causal link with occupational risks, as they may have been contracted during working activities with prolonged exposure to risk agents present in the workplace. The risk can be caused by the work carried out, or by the environment in which the job itself takes place. The main occupational diseases can result from exposure to chemical, biological, physical agents or can be linked to ergonomic or psychosocial factors. One of the most closely monitored risk is the biological one, linked to the possible spread of epidemics and pandemics. To this end, Eni constantly analyzes and monitors local epidemiological contexts for better prevention and management of any emerging outbreaks and pandemics. The stakeholders potentially impacted by the listed pathologies and any health emergencies are both own workers and workers in



the value chain. In addition to the risks of blowout, accidental and biological ones, mentioned above, another material risk<sup>144</sup> related to its workers concerns potential global security scenarios: the risk of adverse scenarios and/or potential threats in Eni's areas of strategic interest in relation to actions or events of a malicious or negligent nature of a criminal or political nature, may lead to actual or potential damage to Eni's people, and specifically to the groups of workers in these areas.

## ACTIONS TAKEN ON MATERIAL IROs

### Occupational and process safety

Eni constantly invests in the implementation of the actions necessary to ensure the **people's safety** in the workplace, in particular in the development of models and tools for risk assessment and management and in the promotion of a culture of safety, in order to pursue its commitment to zero accidents and safeguarding the assets integrity. To prevent accidents, in addition to the continuous updating of management documents and operating instructions, during the year, both initiatives were introduced to strengthen the sensitivity and engagement of employees and contractors in the HSE field (Safety Golden Rules and Principles, Safety Leadership, technical and Behavioral Safety Coaching Program, promotion of the Stop Work Authority<sup>145</sup>), and activities aimed at improving work areas in terms of personnel safety, as well as the implementation of new digital technologies to support operational safety. This

commitment focuses on technical and non-technical skills and digitization. Regarding non-technical skills, in 2024 the application of the methodology The Human Error Model for Eni (THEME) continued on five new sites, in order to identify strategies to strengthen human barriers. With regard to technical skills, the new campaign on the Eni Safety Golden Rules & Principles was launched, with particular emphasis on the Stop Work Authority and the Line of Fire, with the aim of promoting the fundamental principles and minimum safety requirements to be applied during risky activities. With regard to digitization, the Safety presense tool, i.e. the artificial intelligence tool capable of predicting recurring dangerous situations starting from weak signals recorded in safety databases, has generated 520 alerts since its start, that have led to the implementation of targeted preventive actions. Finally, the evolution and promotion of the HSEni App continued. This app is used to report unsafe conditions, compile checklists, and consult Eni's safety rules, with the roll-out completed to about 11,000 users on over 200 sites worldwide. In the field of **Process Safety**, in order to minimise accidents and improve performance, Eni carried out various activities: the creation of a handbook relating to the Process Safety Fundamentals, the principles to be followed during plant activities; the training of over 2,000 technical/operational and HSEQ area resources on Process Safety at Eni; an in-depth study of issues related to safety in the management of fluids for new energy supply chains, revising process safety standards to include specific design requirements for hydrogen, CO<sub>2</sub> and other substances from new supply chains.

### EXPENDITURES<sup>(a)</sup>

|   | Units of measurement | 2024 | 2023 |
|---|----------------------|------|------|
| Total safety expenditures                                   | (M€)                 | 344  | 281  |
| <i>of which: equipment, facilities, and fire management</i> |                      | 94   | 71   |
| <i>of which: maintenance of equipment and facilities</i>    |                      | 72   | 67   |
| <i>of which: safety of plants, buildings, and vehicles</i>  |                      | 73   | 63   |

(a) The items in the table are included in Eni's 2024 consolidated financial statements, in the item in ► [Note 14 "Intangible assets"](#) and in ► [Note 30 "Costs - Purchases, services and other charges"](#). The total safety expenditures include further types of expenses not listed in the table.

In the field of safety of people and assets, Eni has allocated resources of €1.5 bln for the next four years, in particular for fire plants, equipment and management (€0.4 bln), safety of

plants and vehicles (€0.3 bln), maintenance of safety systems and equipment (€0.3 bln), controls, supervision, inspections and tests (€0.2 bln).

### EXPENDITURES<sup>(a)</sup>

|   | Units of measurement | 2024 | 2023 |
|---|----------------------|------|------|
| Safety expenditures for industrial hygiene activities | (M€)                 | 8    | 7    |

(a) The items in the table are included in Eni's 2024 consolidated financial statements, in the item in ► [Note 14 "Intangible assets"](#) and in ► [Note 30 "Costs - Purchases, services and other charges"](#).

(144) For further information on the connection between risks and Eni's strategy and business model, see the ► [Business Model](#) chapter and for treatment actions, see the sections ► [Integrated Risk Management](#) and ► [Risk Factors and uncertainties](#).

(145) With the Stop Work Authority, every worker, at any Eni site, has the authority to stop an activity when they detect dangerous behaviour or condition.

## ASSET INTEGRITY

Eni applies the Asset Integrity process to all the development and management activities of its plants in order to ensure the best integrity of design and construction, as well as the utmost rigor in their operation up to decommissioning, managing risks related to the safety of people, the protection of the environment and the reputation of the company (for the assessment of risks associated with acute and chronic natural events, see [Climate Change](#)). In 2024, it incorporated the most advanced scientific and technical tools on the market into its work processes and revised the internal regulatory framework so that the risks due to climate change are managed both in historical and forecasting terms, ensuring that working hypotheses, tools and technical solutions are always in line with Eni's values and objectives.

## Health

Eni has developed a health management system integrated into all operating entities, and it includes occupational medicine, industrial hygiene, traveller's medicine, medical assistance and emergency, and health promotion, with coverage for the entire Eni population, in addition to activities to protect and promote the health of communities (see [Local communities](#)). The health management strategy is oriented, in addition to the maintenance and continuous improvement of health-related services, to: (i) enhance access to assistance for all Eni's people to emergency facilities (especially for infectious diseases) and services and initiatives to support situations of fragility, mental health and aimed at inclusion; (ii) to spread the culture of health through health welfare initiatives and services in favour of workers and their families; (iii) implement occupational health activities also with the contribution of scientific research, in view of the risks associated with new projects and industrial processes and considering industrial hygiene activities; (iv) promote the digitalisation of processes and telemedicine. The application of the health management system, intended as a set of actions aimed at continuous improvement, guarantees a constant commitment to mitigating impacts, and its implementation is periodically monitored also through audit activities. The health management system makes use of both internal resources, health professionals and management staff, and a network of specialized

external providers. In 2024, initiatives to promote health and well-being were strengthened, with a focus on risk management in the workplace and on raising awareness through new digital tools. At the same time, collaboration continued with research centres and universities to assess the impacts of new production processes, with a focus on biorefineries and agribusiness, in particular with the involvement of the Health Committee of the Eni Enrico Mattei Foundation. The main actions include **occupational health and industrial hygiene** activities, such as: (i) medical, and occupational hygiene activities aimed at assessing, identifying and controlling risk factors that may have impacts on workers' well-being; (ii) testing of new technologies for monitoring the healthiness of indoor work environments (99 sensors tested at onshore operating sites in Italy); (iii) preparedness and response activities to health emergencies. Further initiatives concern **medical assistance** for Eni workers and their families, in line with the results of the needs analysis and epidemiological, operational and legislative contexts such as: (i) services and benefits for the prevention, diagnosis, treatment and management of acute and chronic diseases, for workers and, where applicable, family members; (ii) online psychological support service for employees in Italy and abroad, (74% coverage); (iii) Psychological First Aid (PFA) service available to all employees in Italy and abroad in cases of catastrophic and unexpected events; (iv) specific services concerning gender-based assistance, such as, in Italy, a helpline dedicated to victims of harassment and gender-based violence; (v) a package of free 24-hour health care services for Eni's people and their families in Italy (telemedicine, home medical services, bookings and anamnestic interviews). Furthermore, **activities for the promotion of health** are also developed for employees and, where applicable, their family members. These activities are: (i) raising awareness in relation to endemic diseases, such as tuberculosis and malaria, sexually transmitted and non transmissible diseases, such as diabetes and hypertension worldwide; (ii) extension in many Italian cities of the free biennial check-up service for cancer and cardiovascular prevention, which involved 44% of Eni's population.

As for future resources, investments in health activities planned for the four-year period 2024-2027 amount to approximately ~€267 million.

## EXPENDITURES<sup>(a)</sup>

|   | Units of measurement | 2024 | 2023 |
|---|----------------------|------|------|
| Total health expenditures   | (M€)                 | 47.9 | 58.3 |
| <i>of which: for medical assistance and emergency management activities</i> |                      | 22.6 | 29.8 |
| <i>of which: for occupational medicine activities</i>                       |                      | 14.9 | 15.9 |
| <i>of which: for community health activities</i>                            |                      | 7.5  | 10.5 |
| <i>of which: for health promotion activities</i>                            |                      | 1.4  | 1.1  |
| <i>of which: for training and management activities</i>                     |                      | 1.5  | 1.0  |

(a) The items in the table are included in Eni's 2024 consolidated financial statements, in the item in [Note 14 "Intangible assets"](#) and in [Note 30 "Costs - Purchases, services and other charges"](#).



## Health and Safety in the value chain

The unit dedicated to the HSE management of contractors, the Safety Competence Center (SCC), aims to improve the safety of contract work and the provision of specialized training and training services, as well as HSE operational support to the business. In 2024, it continued to proactively oversee and support the process of improving companies, promoting management models characterized by an increasingly preventive culture of safety and environmental protection, monitoring over 3,000 suppliers in Italy and abroad, promptly managing situations found below the standard and enhancing the innovative good practices identified, ensuring that they are shared among contractors. In 2024, the Safety and Environmental Pacts (voluntary agreements with companies) were active in 92 sites in Italy and 20 abroad and will be extended in 2025, with the support of SCC, to additional companies abroad related to Versalis, Enilive and for some companies/JVs in the GGP&Power sector. In addition, in 2024 a program dedicated to training and raising awareness of the refinery sector supply chain was implemented, involving strategic suppliers with the aim of promoting key messages on health and safety at work. The program focused on the active involvement of management, the strengthening and monitoring of skills, the application of the principle of the "Stop Work Authority" and the adoption of all the necessary measures to ensure safety. In addition, for the management of health risks along the value chain of the agro-industrial chain, Eni has launched internal programs and external collaborations with international bodies, including the ILO, in particular, in Ivory Coast and Kenya where evaluations have been carried out for the improvement of practices in the field of health and

safety at work and social protection. The activity involved, in addition to Eni, farm owners, agricultural workers and their representatives. For activities and measures to protect the safety and health of workers in the supply chain, see the [Health & Safety](#) section.

## METRICS<sup>146</sup>

### Safety

Eni's internal HSE regulatory system establishes the obligation to adopt an HSE management system for all companies that have employees; for those companies with more than 250 employees or that carry out industrial activities, in addition to the development of the system, certification according to ISO 45001 and ISO 14001 standards is required. With reference to Eni's health management system, all employees and contractors are covered by it, also in light of precise internal application procedures in line with the regulations in force in the Countries in which it operates. In 2024, the Total Recordable Injury frequency Rate (TRIR) increased compared to 2023 for both contractors and employees since, the decrease in worked hours recorded in the period was not matched by a reduction in the number of total recordable injuries, which rose to 67 for contractors (54 in 2023) and remained stable at 39 for employees. In particular, 5 fatal accidents to contractors were recorded in Italy in relation to the accident that occurred on 9<sup>th</sup> December, 2024, at the Eni depot in Calenzano: investigations by the Judicial Authority into the dynamics and causes of the event are ongoing<sup>147</sup>. The fatality index of contractors rose to 4.96, while that of employees remained zero.

### OCCUPATIONAL SAFETY METRICS<sup>(a)</sup>

|   | Units of measurement                                 | Employees |      | Contractors |       |
|---|--|-----------|------|-------------|-------|
|   |  | 2024      | 2023 | 2024        | 2023  |
| Percentage of workers covered by a health and safety management system based on legal requirements and/or already recognised standards or guidelines <sup>(b)</sup> | (%)  | 100       | 100  | 100         | 100   |
| Number of fatalities as a result of work-related injury   | (number)   | 0         | 0    | 5           | 1     |
| Number of total recordable injuries   |  | 39        | 39   | 67          | 54    |
| Total recordable injury frequency Rate (TRIR) index   | (total recordable injuries/worked hours) x 1,000,000 | 0.69      | 0.66 | 0.66        | 0.52  |
| Number of lost days due to work-related injuries  |  | 1,009     | 563  | 1,639       | 1,138 |
| Fatality index  | (fatal injuries/worked hours) x 100,000,000          | 0.00      | 0.00 | 4.96        | 0.95  |
| Worked hours  | (million hours)                                      | 56.8      | 59.2 | 100.8       | 104.8 |

(a) With regard to occupational safety metrics, Eni also continues to monitor safety-related indicators according to the scope of consolidation that it used until 2023, before the entry into force of the ESRS standards, in line with the target defined within its strategy, whose 2024 performance, referring to the Frequency Index of Total Recordable Accidents (TRIR) of the workforce is equal to 0.48. Considering this area of consolidation, the TRIR for employees equals to 0.51 (considering to 48 accidents, 1,148 days lost and 94.4 million worked hours) and for contractors to 0.47 (considering to 91 accidents, 1,813 days lost and 194.2 million worked hours). Compared to the operated boundary, there was a further fatal accident for contractors.

(b) Among the main guidelines is the ISO 45001 standard.

### WORKFORCE OCCUPATIONAL SAFETY METRICS

|   | Units of measurement                                 | 2024 | 2023 |
|---|--|------|------|
| Workforce Total Recordable Injury Rate (TRIR) index | (total recordable injuries/worked hours) x 1,000,000 | 0.67 | 0.57 |
| Near miss   | number   | 563  | 566  |

(146) For the methodology and scope of consolidation, see the chapter [Reporting principles and criteria](#).

(147) The company provides full cooperation for every need of the Judicial Authority and, regardless of any merit profile of the matter, is collecting all compensation claims with respect to any material and non-material damage that has occurred, for the purpose of their liquidation.



## Health

As far as occupational diseases are concerned, in 2024 there were 34 claims, of which 8 concerned personnel currently employed and 26 related to former employees (none submitted by heirs). In 2024, the number of healthcare services supported by Eni amounts to over 232,000, of which 63% in favour of employees,

17% in favour of family members, 18% in favour of contractors and 2% in favour of other people (e.g. visitors). The number of participations in health promotion initiatives in 2024 is over 140,000, of which 77% by employees, 21% by contractors and 2% by family members.

## HEALTH METRICS

| Units of measurement   | Employees |      | Contractors |      |
|--|-----------|------|-------------|------|
|  | 2024      | 2023 | 2024        | 2023 |
| Number of occupational diseases claims submitted by heirs (number) | 0         | 2    | 0           | 0    |
| Number of cases of occupational diseases claims                    | 8         | 17   | 0           | 0    |

## Process safety

In 2024, there was a further decrease in the sum of Tier 1 and Tier 2<sup>148</sup> process safety incidents, which has been steadily decreasing since 2018. In particular, 5 Tier 1 Process Safety Events (PSE)

and 10 Tier 2 were recorded. More than half of the PSEs (54%) resulted in a product spill, 33% in a gas release, and 13% in a fire/explosion.

## PROCESS SAFETY

| Units of measurement                  | 2024 | 2023 |
|---------------------------------------|------|------|
| Process safety events Tier 1 (number) | 5    | 10   |
| Process safety events Tier 2          | 10   | 9    |

# WORKERS IN ENI'S VALUE CHAIN

## POLICIES<sup>149</sup>

Eni's commitment to respect and engage workers in the value chain is introduced in the [Code of Ethics](#), which sets out the expectation that its counterparties should adopt socially responsible behaviour and develop appropriate ethical programmes and controls, being consistent with the principles and behaviours presented in the Code. Eni reserves the right to take appropriate measures against those parties not meeting expectations and not acting in accordance with the principles of the Code. Eni [Policy ECG Respect for Human Rights in Eni](#) highlights the commitment to ensure a work environment free from any form of discrimination or abuse, establishing employment relationships inspired by fairness, equality, non-discrimination, attention to and respect for the dignity of the person, the commitment not to violate Human Rights and to remedy any critical issues that may arise from the activities in which it is involved. In addition, the policy underlines the commitment to guarantee and promote the right of workers and employers to form trade unions, at their own free choice, as well as the right to collective bargaining, committing itself to

ensuring a safe and healthy working environment following the highest international standards on health and safety, the specific laws and regulations of the Countries in which it operates. A commitment to promote the dignity of workers along the entire value chain is stated, as well as the rejection of any form of forced or compulsory labor, any practice of labor exploitation including, for example, trafficking in human beings, the limitation of the freedom of movement, the seizure of identity documents and child labor. The adoption of processes to prevent any violations of Human Rights and the evaluation of its suppliers through a **risk-based model** is clearly stated, requiring the implementation of corrective actions and their implementation monitoring. In addition, it's included the commitment to involve its third parties in the prevention or mitigation of adverse impacts on human rights that their activities, products or services could cause or contribute to causing or to which they are directly linked. Eni's suppliers are subject to a contractual obligation to comply with the principles stated in the applicable national and international regulations

(148) Process safety incidents are classified, according to severity, into Tier 1 (most serious), Tier 2, Tier 3 (least severe).

(149) For further references, see [The regulatory system](#), and [Reporting principles and criteria/policies](#).



and instruments, in the guidelines and best practices that aim to prevent violations of Human Rights, including the UNGPs, the OECD Guidelines and the ILO Declaration on Fundamental Principles and Rights at Work, as well as the Code of Ethics and [Supplier Code of Conduct](#)<sup>150</sup>. This code, inspired by the principles expressed in the Code of Ethics, in the [Anti-Corruption MSG](#) and in the [Policy ECG Respect for Human Rights in Eni](#), describes requirements and expectations all suppliers are required to comply, with a view to continuous improvement of their activities and performance. The Supplier Code of Conduct represents a pact that guides and characterizes relations with suppliers based on the principles of social responsibility. Its adoption commits the supplier to operate with integrity, safeguarding its people and promoting the adoption of these principles also in its supply chain. The document contains provisions relating to health and safety, child labour, and irregular labour, trafficking in human beings, forms of modern slavery, fair working conditions, trade union freedoms. As mentioned in the chapter [Human rights for Eni](#), the company is committed to make reporting tools available to its stakeholders, including its suppliers and their employees, as expressed in the Supplier Code of Conduct, and expects suppliers to make available to the workers and communities with whom they interact in the interest of Eni, their remedy mechanisms, being available also anonymously, or to refer to Eni channels if they do not have their own channels. Finally, Eni's [Position on Conflict Minerals](#) reiterates that the company pursues the objective of reducing the risks of human rights violations, including indirect ones, in relation to the extraction, production and supply of certain minerals in conflict areas of Central Africa subject to the influence of illegal armed groups.

## TARGETS AND COMMITMENTS

Eni's targets relating to respect for the human rights of workers in the value chain are part of the broader objectives of ESG assessment of suppliers and their engagement in achieving a fair and sustainable transition, detailed in section [Business Conduct](#), while for safety and health issues, please refer to the [Health & Safety](#) section.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROS)

Although Eni's activities contribute to increase the employment rate throughout its value chain, they may also be associated with negative impacts affecting stakeholders such as contractors, suppliers' workers and business partners. In fact, the complexity of the group's activities causes the involvement<sup>151</sup> of a large number

of suppliers and business partners of various nature and size, who operate in Countries characterized by different socio-economic and cultural contexts and in activities and sectors that can be identified as at greater risk of human rights violations. In addition, the presence of joint ventures or other business relationships in certain Countries and contexts increases the likelihood of potential impacts in terms of forced labor and modern slavery. Similarly, impacts in terms of sexual harassment in the workplace are more likely to occur in sectors where there is a significant male presence and in remote locations. In addition, the outsourcing of production-related activities can generate negative impacts in terms of employment guarantees, wage adequacy, non-application of collective agreements, obstacles to freedom of association and union membership. The adoption of structured due diligence in the management of relationships with suppliers is essential to prevent and mitigate any negative impacts ([Actions taken on material IROs](#)). There are no generalized or systemic negative impacts related to Eni's procurement activities or commercial relationships, therefore, such impacts – if they occur – may be related to individual specific events. With regard to the positive impacts related to relations with suppliers, see the [Business Conduct](#) chapter. No material risks or opportunities have been identified (see [Materiality](#)) at group level deriving from the impacts and dependencies on workers in the value chain, net of the transversal risk of Cyber Security explored in the [Business Conduct](#) chapter.

## Types of workers in the value chain

In light of the composition of the value chain, the workers most closely monitored by Eni exposed to potential impacts are mainly: (i) those who work for Eni's suppliers; these workers are also involved in specific training and activities of awareness, in particular for workers at Eni's operating sites in relation to HSE issues; Eni also verifies compliance with human rights on these companies with a risk-based approach, analysing and classifying suppliers according to a level of potential risk based on the Country context and the activities carried out; (ii) those who work for the Eni's business partners<sup>152</sup>, also in JVs, who are also screened on aspects related to respect for human rights and other issues such as anti-corruption and transparency (see the [Business Conduct](#) chapter). In certain high-risk geographical contexts, there are workers who may be considered more vulnerable, such as migrant workers, those working in remote areas or belonging to minority groups, and that therefore, are exposed at potential risk of forced labour, modern slavery or child labour<sup>153</sup>. In addition, according to the risk-based model adopted, both industrial activities (such

(150) The Supplier Code of Conduct is aligned with the ILO Declaration on Fundamental Principles and Rights at Work.

(151) For further information on how impacts related to workers in the value chain are taken into account in the definition of the company's strategy and business model, see chapter [Stakeholder engagement](#).

(152) Including, for example, those involved in logistics, distribution, and sales activities.

(153) The geographical areas most at risk, identified with the specialist data provider (Maplecroft) are: Angola, China, Congo, Ghana, Indonesia, Iraq, Kenya, Libya, Nigeria, Pakistan, Turkmenistan, Venezuela, Vietnam (source Maplecroft Q4-2024).

as maintenance, construction, assembly, logistics), and general services (such as cleaning, catering and security) have been classified as activities with a high risk of human rights violations. On the basis of the potential impacts, monitoring and mitigation measures are defined to allow proper management of the risk of human rights violations (see [■ Actions](#)).

## ENGAGEMENT OF THE WORKERS IN THE VALUE CHAIN

Workers engagement activities in the value chain take place primarily with the supplier, as a legal entity, at every stage of interaction with the counterparty, since the business qualification phase and throughout the sourcing and contract execution phases. These activities, coordinated by the central procurement function, with the support of the business procurement units and the requesting units, can be summarised in: (i) workshops and training on human rights and other social issues; (ii) safety-related workshops (see [■ Health & Safety](#)); (iii) training activities on sustainability and energy transition issues (see [■ Business Conduct](#)); (iv) training activities on anti-corruption issues (see [■ Business Conduct](#)); (v) training activities on the responsible management of the supply chain. The effectiveness of engagement activities is assessed on the basis of periodic assessments of suppliers' positioning with respect to the issues touched on through audits and verifications and with the consequent monitoring of the implementation of the action plans shared considering the gaps detected. With regard to the companies considered to be most exposed to potential negative impacts under the risk-based model (see [■ Actions taken on material IROs](#)), on-site audits, that include interviews, are carried out with the workforce on aspects related to human rights and the conduct of the company.

### Whistleblowing mechanisms for workers in the value chain and remediation processes

The model for monitoring potential impacts in the procurement process allows to detect these aspects from the qualification process to the contracts award and during their execution, providing for improvement or remediation actions in the event of actual impacts. The process of assessing the potential impacts on Human Rights and identifying appropriate remedial measures is consistent for all categories of stakeholders and is further detailed in the [■ Human Rights for Eni](#) chapter, which also describes the Grievance Mechanism and whistleblowing, which can be used in the event of an alleged violation<sup>154</sup> of the [🔗 Code of Ethics](#), human

rights and safety and health arrangements. Eni prohibits and is committed to prevent any retaliation against workers and other stakeholders who have reported critical human rights concerns, nor does it tolerate or facilitate threats, intimidation, retaliation and attacks (physical or legal) against human rights defenders and other stakeholders (see [■ Business Conduct](#)). Eni also expects its suppliers to make available to workers and communities their own whistleblowing and remediation mechanisms, which can also be accessed anonymously.

## ACTIONS TAKEN ON MATERIAL IROs

Eni's commitment to involve the entire production system in a sustainable path is translated into tangible solutions and in a strategy characterized by market openness, by a collaborative approach and by interest in people and innovation. The focus on people means that the attention, particularly regarding respect for human rights, is not only concentrated on direct contractual relationships, but also extends to the workforce of sub-contractors and potential suppliers. This approach is reflected in a procurement process that provides: (i) the adoption by the Procurement function of transparent, impartial, consistent and non-discriminatory conduct in the selection of suppliers, in the evaluation of bids and in the verification of the activities outlined in the contract, (ii) the assessment of the respect for human rights of suppliers through the application of a dedicated model. This model is applied throughout all phases of the procurement process, from qualification to contract execution, and provides for different controls and actions performed by all the units involved in the business relationship with the third party (central procurement function, procurement units and contract management units).

The model allows suppliers to be subject to a continuous monitoring process, in order to periodically evaluate the effectiveness of the actions adopted and update the assessments relating to each supplier. The **model** adopts a **risk-based approach** that allows suppliers to be analyzed and classified according to a level of potential risk of generating negative impacts based on: (i) the Country risk of the supplier that assesses the probability of occurrence of human rights violations, on the basis of information from data providers (Maplecroft) and (ii) the risk of the activities carried out by the supplier, assessed considering vulnerabilities related to specific conditions, such as the use of labor, the level of training and skills required by workers to perform their tasks, the use of manpower agencies as well as the health, safety and environment risks. On the basis of the risk mapped, the model provides for controls inspired by international standards such as the SA8000 (the higher the risk of

(154) For any cases of human rights violations, incidents and allocated resources, see the [■ Human Rights for Eni](#) chapter.



negative impact of the supplier, the more detailed the assessment and the actions implemented) and the adoption of specific prevention and mitigation measures, as well as monitoring plans aimed at accompanying the supplier in the adoption and development of a culture of respect for human rights. As part of human rights due diligence, (non-material) management expenses related to the functions and personnel involved are provided every year, as well as costs for on-site audits carried out by third parties. In order to acquire or maintain supplier status, all companies are required to sign the Supplier Code of Conduct and, at contract award, specific clauses are adopted to guarantee respect for human rights,<sup>155</sup> providing, in some cases, a clause to carry out checks by Eni at the supplier's premises. Due diligence checks are also conducted on the involvement of the supplier in cases of human rights violations, regardless of the level of risk associated, through the use of open sources and periodic qualification checks, based on performance indicators, documentary analysis or dedicated field audits and questionnaires, depending on the level of risk, in order to minimize the probability of violations. During the tender phase, minimum requirements on human rights are requested and assessed, in particular in the case of activities with a potential significant risk of negative impacts. During the execution of the contract, Eni assesses and monitors contractors and subcontractors through feedback and document verifications with the aim of preventing impacts related to forms of modern slavery or forced labour, child labour, wage discrimination, contribution irregularities and other aspects related to the potential negative impacts that may be generated on workers. In the event of critical issues, improvement plans are defined with a focus on respect for human rights with the request for the implementation of specific actions and, in the event that the minimum requirements of acceptability are not met, participation in tenders is inhibited; in the most serious cases of non-compliance, the relationship with the supplier is interrupted, and it is excluded from Eni's vendors list. Eni, with a view to continuous improvement, aims to further strengthen its due diligence along all levels of the supply chain, consolidating tools and methodologies to make the model increasingly accessible and replicable by the suppliers with whom it collaborates. The aim is to promote an even more incisive empowerment of direct trading partners, encouraging them to systematically carry out due diligence on their third parties and to actively monitor human rights throughout the supply chain. At the same time, Eni is committed to strengthening internal audits of subcontractors and all the entities with which it has business relationships, with particular attention to critical or high-risk contexts, adopting an even more

rigorous approach. This path aims to improve the ability to identify, prevent and mitigate risks, strengthening transparency and shared responsibility along the supply chain in the short and medium term. Based on the model described above, more than 1,000 human rights audits were carried out in 2024, both on documents and on contractors and subcontractor's sites, more than double the number of audits performed in 2023. Suppliers that have shown deficiencies have been limited from participating in Eni tenders and a corrective action plan has been agreed with them to ensure respect for human rights. In particular, during an audit on a supplier, a case of discrimination at work was found in the pre-employment phase, resulting in the supplier's limited ability to participate in procurement procedures, while sharing a remediation plan whose implementation will be verified by Eni through on-site audits. These assessments set out a path of improvement for suppliers showing gaps in this area, encouraging constructive discussion and greater awareness of the areas of intervention. In addition, through reporting through the whistleblowing channel and following the ascertainment of certain impacts on the working conditions of workers in the value chain (overload in working hours), Eni took procedural and contractual actions to avoid the relapse of non-compliant events.

### Further initiatives and measures undertaken

Eni organises workshops, trainings and awareness-raising moments where suppliers could discuss ESG issues with experts, including those about the respect for human rights in the supply chain. Eni also promotes knowledge of human rights safeguards through employee training programs and workshops for professionals with a role in the management of suppliers of foreign companies; in this context, in 2024 the course "IPIECA: Online Labour Rights training" was made available to colleagues that deal with procurement in foreign companies and to the employees of their suppliers. In addition, during 2024, as part of the Open-es initiative, together with the involvement of suppliers in workshops dedicated to training and raising awareness on the respect of human rights, an area dedicated to measuring aspects relating to respect for human rights was made available to Eni's suppliers and all companies in the community. Through an assessment, companies receive feedback on their positioning and some useful ideas and suggestions on the actions to be taken to improve. All actions taken are part of the broader support to suppliers in fulfilling the various ESG requirements, providing tools to support a sustainable development path and more generally the competitiveness of their business (for actions and related metrics, see the chapter, see [Business Conduct](#)).

(155) Eni has prepared a series of standard clauses on respect for human rights to be included, on the basis of a risk-based approach, in the main Eni contract types and provides business support for their negotiation. These clauses, which can be supplemented and adapted to the specific case, are classified according to the type of counterparty and contractual case: (i) light (mainly referring to preliminary agreements and with public counterparties); (ii) medium (referring to commodity contracts, consultancy contracts and active supply contracts); (iii) processed (referring to passive supply contracts or complex transactions such as M&A).

## The commitment to the health and safety of workers in the value chain

Eni requires its suppliers to identify and assess the risks relating to the health and safety of its workers, providing appropriate prevention and protection tools against behaviors that could harm people, assets and the environment, periodically updating working methodologies and using the best available technologies, for continuous improvement. The full commitment of top management is required in managing the health and safety of people, including workers' training on this subject and raising awareness about adopting safe working practices and behaviors. Specifically, when activities are carried out at Eni sites, suppliers are required to ensure cooperation with Eni and other suppliers, for example, in the proactive application of good operational practices, reporting of dangerous conditions/actions, investigation and sharing of lessons learned from all accidental events. For activities, metrics and measures to protect the safety and health of workers in the supply chain, see the [Health & Safety](#) section.

## The monitoring model for other business partners

Eni's general approach with partners is to ensure that the principles included in its Code of Ethics are integrated into the legal framework of the joint venture through the adoption of its own Code of Ethics. In cases where its influence is limited, Eni has adopted formal rules to ensure that the Code of the joint venture is fully aligned with Eni's. In addition to these contractual measures, there are training initiatives dedicated to business partners to ensure the continuous dissemination of the principles of the Code of Ethics. Moreover, contractual clauses on compliance with the Code of Ethics are also included in agreements with joint venture partners, including national oil companies. To integrate human rights into the preliminary stages of business, Eni has introduced a contractual clause, as an integral part of the so-called Sustainability Golden Rules, to be negotiated and applied to joint venture agreements and oil contracts with state authorities and government bodies; this clause requires partners to fulfil their obligations in compliance with key international human rights standards and in accordance with the UN Guiding Principles on Business and Human Rights. In the event of disagreement, Eni commits with its partners to identify potential areas for discussion and agree on the final text. These Golden Rules also provide for negotiating: (i) the inclusion of a commitment to respect and promote human rights, in particular towards human resources, procurement, HSE, security, local communities and for access to remedies, leveraging this inclusion to obtain a mutual obligation from the host Country; (ii) the commitment to promote the organization of training and awareness campaigns on human rights with the participation of local staff, suppliers and local communities. In addition, human rights have been integrated into the due diligence

checks preceding M&A transactions, investment transactions and the negotiation of agreements with joint venture partners. In the event that warnings emerge from business partners regarding human rights, Eni takes appropriate measures towards the partner. Before setting up a joint venture agreement, an M&A transaction or a sale or purchase of exploration titles, an analysis is conducted on the potential partner to verify, through open-source controls, the existence of critical human rights issues related to these counterparties. 100% of oil & gas business partners were checked according to this procedure. In addition, an annual assessment of compliance with the human rights clause in the Joint Operating Agreements and oil contracts is carried out, in order to identify cases of full, partial or non-implementation and to possibly highlight areas of improvement.

## LOCAL COMMUNITIES

### POLICIES<sup>156</sup>

Eni's commitment to local communities is included in the [Code of Ethics](#), in which it is reaffirmed the support, including through strategic alliances with internationally recognized partners, as well as the adoption of security measures aimed at protecting people and assets in compliance with human rights. The [ECG Policy Respect for Human Rights in Eni](#) deepens respect for the rights of individuals and local communities, with particular reference to biodiversity, environmental protection, safeguarding so-called "culturally sensitive" areas, the right to ownership and use of land and natural resources, the right to water and the highest achievable level of physical and mental health. No form of Land Grabbing is tolerated and particular attention is paid to the rights of Vulnerable Groups with a focus on minors, national or ethnic, religious and linguistic minorities, people with disabilities, migrant workers and their families. Respect for the rights of women and girls in the communities is reaffirmed, ensuring their effective engagement during all activities, and for indigenous peoples with particular reference to their cultures, lifestyles, institutions, ties with the land of origin and development models, in line with international standards. The policy also explores, the ways in which communities can be involved through preventive, free and informed consultations, with particular attention to the presence of Vulnerable Groups. The commitment to avoid communities relocations is also underlined. In case the relocation cannot be avoided, there will be consultations in order to define joint agreements, guaranteeing local communities a fair compensation and the improvement of their living conditions, also providing for special complaint mechanisms<sup>157</sup>. The Policy also includes a specific commitment to respect human rights in the context of security activities, aimed at protecting people and assets from any threat from third parties that could cause direct or indirect damage. These activities are conducted through the implementation

(156) For further references, see the [The regulatory system](#) and Eni's [Reporting principles and criteria/Policies](#).

(157) For further information on the Policies in relation to the Due Diligence model and the related remedy measures, see [Human rights for Eni](#).



of a security risk management system in compliance with the highest international standards, such as the Voluntary Principles on Security and Human Rights, and taking into account the needs of the Countries in which it operates. Within the **internal regulatory framework**, the model for supporting local development is defined and regulated, divided into various sub-processes: understanding the context, integrating sustainability and health into the business, knowledge of needs, of expectations and development of initiatives, monitoring, evaluation and reporting. In addition, the commitment and operating methods for health impact assessments and community health projects are defined.

## TARGETS AND COMMITMENTS<sup>158</sup>

The targets and commitments for local communities are connected to the principles outline in the Policies and, they are defined, with a

bottom-up approach by aggregating individual initiatives based on specific indicators for each sector of intervention, in line with the SDGs. Monitoring takes place internally on a quarterly basis, tracking progress in the Stakeholder Management System platform and the results are published in Eni's sustainability reporting, also at local level. Performance evaluations are carried out both at mid-term and at the end of the cycle to identify best practices and lessons learned, involving the main stakeholders also through information sessions in which the results are disseminated. The targets below are divided by Eni's priority areas of intervention. Specifically, for the main sectors of intervention (education, energy, economic diversification, water and life on land), targets were defined with the direct engagement of stakeholders, whereas for activities related to the objective concerning health services, the local health authorities were involved.

| Target  | Target year | 2024 performance <sup>(a)</sup> | Base year and reference value | Notes (scope, methodology, evidence) |
|---|-------------|---------------------------------|-------------------------------|--------------------------------------|
| 19.5M People supported in access to sustainable energy through the distribution of improved cooking systems (clean cooking) | 2030        | About 1,2M People supported     | 2023<br>275K People supported | Applicable to all Business Lines     |
| 315,000 New students supported in access to education (primary, secondary and tertiary)                                     | 2030        | 100K People supported           | 2023<br>40K People supported  | Applicable to all Business Lines     |
| 85,600 People who have access to sustainable energy (electricity)   | 2030        | 7K People supported             | 2023<br>51K People supported  | Applicable to all Business Lines     |
| 21,000 Farmers and entrepreneurs supported in access to economic development  | 2030        | 4,8K People supported           | 2023<br>15K People supported  | Applicable to all Business Lines     |
| 790,000 People supported in access to drinking water (including awareness campaigns)  | 2030        | 113K People supported           | 2023<br>62K People supported  | Applicable to all Business Lines     |
| 2.3M People supported in access to health services  | 2030        | 820K People supported           | 2023<br>330K People supported | Applicable to all Business Lines     |
| 85,000 people involved in environmental and biodiversity protection activities  | 2030        | 6,1K People supported           | 2023<br>17K People supported  | Applicable to all Business Lines     |

(a) 2024 performances are in line with or above the targets set for 2024.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROs)

Sustainability is embedded in all Eni's business activities, from the early stages of the project and throughout its life cycle, to decommissioning activities. This supports the commitment to the Just Transition by anticipating the needs of communities, also by reviewing operational practices. The relevant communities are identified before starting business activities where Eni is the operator (but also in some joint ventures in which Eni has a significant role in managing local stakeholders). These communities can also be identified outside the area of influence, i.e. the scope of analysis of the impact studies conducted in the preliminary stages of the business. This identification considers the agreements with the host Country and the priorities outline in the National Development Plans. Hydrocarbon exploration and production activities by their nature can potentially generate negative impacts on communities in terms of human rights; Eni is therefore committed to monitoring these potential impacts through a structured due diligence

approach, as well as prevention, mitigation and management programs and measures (see **Human rights for Eni**). These potential impacts can include the impairment of the right to land (or water) due to the need of land for business activities (exploration, extraction, infrastructures for the transport and distribution of products), sometimes leading to the need of temporarily or permanently relocating communities, as well as limit access to certain natural resources or livelihoods. In certain cases, these impacts could affect vulnerable communities or individuals such as indigenous peoples, women, children or the elderly. In the event of physical and/or economic displacement, Eni is committed to minimize the socio-economic impacts on their lives, limiting as much as possible the loss of assets that would compromise sources of income or livelihoods. Other potential impacts on the health of communities may be linked to a potential greater difficulty in accessing health services during the plant's construction, given the increase in the number of people in the area,

(158) The targets, except for those relating to access to electricity, economic development and protection of the environment and biodiversity, were updated during the year both due to expansion of geographical areas and/or to make the targets more challenging.

or the potential greater spread of infectious diseases, such as malaria, or sexually transmissible diseases. In addition, the prevalence of male workers in the sector can imply the risk of gender-based violence and harassment, particularly for those projects that involve a large influx of workers belonging to different communities. Finally, in fragile or conflict-affected contexts, some security forces measures can potentially lead to human rights violations, such as discrimination, harassment, violations of freedom, or violence against local communities, individuals or Human Rights Defenders. With regards to the material risks<sup>159</sup> related to the communities these are: (i) process safety and asset integrity, linked to the occurrence of major accidents; (ii) blowout, relating to the occurrence of an uncontrolled flow of hydrocarbons from inside the well, with potential consequences for neighboring communities; (iii) potential negative perception of Eni by stakeholders in the area which may have negative effects on business operations. The continuous comparison and engagement with local stakeholders and the collaboration with civil society organizations and institutions makes it possible to properly monitor risks and, seize the opportunity to access new business activities in synergy with the territory: in fact the Alliances for development are one of the five levers of the ► **Business Model**. Eni aims to reduce energy poverty in these Countries in which it operates through the by development of infrastructures related to traditional business but also through new forms of energy. The company is committed to generate value in the long-term by transferring its know-how and skills to local partners (following the so-called "Dual Flag" approach). This is achieved through the activation of local supply chains to increase the level of competitiveness of companies, involving local labor and the transfer of skills and knowledge as well as development programs for the economy's growth and diversification of the economy. Starting from the analysis of the local socio-economic context, also based on the global Multidimensional Poverty Index<sup>160</sup>, Eni adopts tools and methodologies to identify potential impacts, negative and positive, direct and indirect, also in relation to human rights, from the early stages of the project, with a view to preventing and mitigating them in new business activities and promoting development. To this end, Eni, in addition to the mandatory requirements for environmental authorization in the Countries where it operates, develops Environmental Social and Health Impact Assessments (ESHIA) and Health Impact Assessments (HIA). These assessments ensure compliance with recognized international standards<sup>161</sup>, and guarantee stakeholders engagement to protect their interests, identify critical issues, assess potential impacts and implement any mitigation measures. In 2024, Eni, with the aim of assessing the potential impacts on the communities involved, concluded 11 studies, 5 of which were integrated into the ESHIAs in Oman, Mozambique, the United Arab Emirates, Cyprus and Vietnam and 6 specific health studies, including a health impact assessment for the Livorno Biorefinery. The communities which are potentially subject

to material impacts are both those located in Eni's business areas and those indicated by the governments of individual Countries, for example those in offshore development areas (such as fishermen located in area 1 in Mexico). Vulnerable groups such as children, women, national and ethnic minorities, migrant workers and indigenous peoples are monitored with particular attention, and indigenous people are subject to specific investigations through inclusive consultations. In addition, the commitment to prevent possible negative impacts on human rights deriving from industrial projects, is realized through the application of a **risk-based model**; this model uses contextual elements, such as the risk indices of the data provider Verisk Maplecroft, and the project design characteristics in order to classify business activities according to the potential risk on human rights and identify appropriate management measures. In-depth studies, "Human Rights Impact Assessment" (HRIA) or "Human Rights Risk Analysis" (HRRRA), are carried out for the highest risk projects, in order to identify and assess the potential impacts also through the engagement of rightsholders, as well as to define recommendations to be translated into prevention and management measures within Action Plans. With reference to local development initiatives, Eni applies the Human Rights Based Approach (HRBA) methodology, which recognises and aims to empower all beneficiaries as rightsholders simultaneously strengthening the capacity of States and other duty holders to respect, protect and apply human rights. In this context, Eni has also introduced an approach aimed at integrating the gender perspective (gender-mainstreaming) into the various phases of local development projects, with specific actions and tools to ensure the identification of potential impacts, as well as maximising positive impacts and preventing negative ones, also through specific training for local sustainability teams.

Finally, in some Countries, such as for example Australia, Kenya, Mozambique and Alaska, Eni operates in areas where there are indigenous peoples or tribal groups for which it has adopted specific policies or procedures to protect their rights, culture (cultural heritage is studied to identify connections with Eni's activities) and traditions and to promote their prior, free and informed consultation. With reference to the positive impacts in terms of local development projects, Eni has defined an approach that is divided into 5 phases: (i) knowledge of the socio-economic, health, environmental and cultural context of the Country; (ii) engagement of stakeholders, through analysis of their requests (and/or any grievances), understanding of local needs<sup>162</sup> and expectations and strengthening mutual trust; (iii) analysis and mitigation of the potential impacts of activities on the environment, health and people, including human rights to identify critical issues, opportunities and risks; (iv) definition and implementation of Local Development Programmes consistent with the National Development Plans, the 2030 Agenda and the analysis of local needs; (v) evaluation and measurement of local development generated through the use

(159) For further information on treatment actions and interaction with the strategy, see ► **Integrated Risk Management**.

(160) The Global Multidimensional Poverty Index, developed in 2010 by UNDP's Human Development Report Office, is an international measure of acute poverty, covering more than 100 developing Countries and integrating traditional measures of monetary poverty with three other key dimensions: health, education and living standards.

(161) Such as UNGPs, OECD Guidelines, IFC Performance Standard and the methodologies defined by IPIECA.

(162) For further information on stakeholder expectations and engagement, see the ► **Stakeholder Engagement** chapter.



of tools and methodologies, such as the Eni Local Content Evaluation (ELCE)<sup>163</sup> and the Logical Framework Approach (LFA).<sup>164</sup> In this context, the numerous collaborations with national and international institutions, cooperation agencies and local stakeholders, foster an approach that helps to identify the key interventions to determine the needs of the communities, and contribute to their development; among, the main collaborations launched and consolidated in 2024 are those with the United Nations bodies (UNIDO, UNESCO, IOM, ILO), national cooperation agencies (AICS and USAID), civil society bodies (ADPP, AVSI, Food Bank, Doctors with Africa CUAMM, AISPO, Elsewedi Electric Foundation, IRC, NCBA CLUSA, Oikos Institute and VIS), and the private sector (CNH Industrial and Iveco Group, Giannina Gaslini Institute and San Donato Group). With regard to local development projects, Eni has developed a systemic approach to define priority areas of intervention, based on local needs, also thanks to alliances with development cooperation actors; These sectors are: (i) community health: vocational training activities, infrastructural interventions (health facilities), awareness-raising and health promotion actions in local communities and activities in support of local health authorities; (ii) education: renovation or construction of school buildings, distribution of materials, awareness campaigns on school participation, vocational training programs; (iii) access to water: construction of wells, treatment systems, upgrading of water and distribution networks, supply of sanitation facilities, educational programs, activities to support access to education for students in primary, secondary, university and post-university schools and teacher training; (iv) economic diversification: micro-entrepreneurship and professional integration projects, entrepreneurial and vocational training programs, mentoring and consulting for small businesses and startups; (v) protection of the territory: support and awareness-raising activities in waste management, replanting of trees, conservation of biodiversity, awareness campaigns; (vi) access to energy: development of micro-grids in rural areas, supply and installation of electrical components or solar panels, construction of transmission lines and connection to the national grid; support in access to improved cooking systems of good quality and certified, and awareness-raising activities on energy efficiency.

## COMMUNITY ENGAGEMENT

While operating in different socio-economic contexts, it is essential to understand the expectations of stakeholders and share choices to build relationships based on mutual trust, to detect actual, potential or perceived impacts, and to identify the most effective ways of engagement. Understanding the context, including the cultural one, makes it possible to develop and promote adequate access channels and to adopt the most relevant methods of dialogue, information and management of any conflicts. The engagement of local communities<sup>165</sup> occurs through preliminary, free and

informed consultations, for which the responsibility is assigned to the Managing Director at local level with the support of the central Sustainability unit. In some contexts, specific figures are identified to develop a constant relationship, also through periodic consultations in the different phases of business activities.

Eni and its subsidiaries therefore carry out specific consultations with local communities, including indigenous peoples and vulnerable groups; in particular, in the event of economic or physical relocation of communities, dedicated meetings are held in order to inform the communities in a transparent and comprehensive manner, with particular attention to the most vulnerable people. For each new business development initiative, engagement occurs through public hearings open to local communities (unless in contrast with the Country's regulations) and local representatives and in any case ensuring the active participation of authorities (including indigenous people) and local representatives to provide accurate information on business developments and to include any feedback throughout the project cycle. These consultations take place through information sessions, focus groups, sharing of information and reports throughout the project cycle, with periodic communications on the progress of business projects and awareness campaigns on health issues. Eni also identifies, where pertinent, the women's associations active in the territories in which it operates, in order to involve them in consultations or propose collaborations. The process of assessing potential human rights impacts and identifying appropriate remedy measures is consistent across all categories of stakeholders and is extensive, together with other human rights reports and complaints (see [Human Rights for Eni](#)). Among the various channels, Eni has defined and applies guiding principles for "Grievance Mechanisms" management whose responsibility, at the operational level, is placed on all the subsidiaries and the districts who analyse and agree on the solution with the claimants (individuals or communities). Any request or complaint received is managed and monitored until closure through agreements with the parties involved, providing a response even if they are not related to Eni's activities. Grievances can be transmitted through online channels, including dedicated email addresses and institutional websites of local companies, or physically at the administrative/operational headquarters or through collection boxes located in areas where the project is held. Eni prohibits and undertakes to prevent any retaliation against workers and other stakeholders who have reported critical issues, and, as indicated in the [ECG Policy Respect for Human Rights in Eni](#), does not tolerate or encourage threats, intimidation, retaliation and attacks (physical or legal) against human rights defenders and other stakeholders in relation to its activities. Finally, Eni is committed to collaborating with human rights defenders in order to

(163) Eni's model, validated by the Polytechnic University of Milan, which makes it possible to quantify the impact of its activities on the Country of presence, measuring the impacts generated, in terms of benefits brought to the economy, society and local communities, for the entire life of a project.

(164) Methodological approach used to plan, manage, monitor and evaluate initiatives or programs/projects, define the objectives and actions to be undertaken. The main component of the LFA called the "Logframe Matrix" describes the logic of the operation, divided into objectives, results and actions, taking into account risks and external conditions that could penalize the execution and outcomes of the planned interventions.

(165) For further information, see also the chapter on [Stakeholder engagement](#) and the [ECG Policy Respect for Human Rights in Eni](#).

create opportunities for engagement and discussion. All grievances received, are analyzed and managed by subsidiaries and are tracked in the Stakeholder Management System application, which is the management tool for mapping the relationship with stakeholders and are classified by topic and relevance, verifying the percentage of those resolved. In addition, both the timeliness in the management and the analysis of the trend of the issues are tracked, in order to assess any repetitions and the evolution towards possible disputes, and any critical issues of the relevant stakeholders in order to adapt the engagement strategy. The confidentiality of the content of the grievance is safeguarded in a manner that protects the whistleblower and the identity of the persons reported, without any prejudice. In order to ensure the effectiveness and robustness of that mechanism, the arrangements for access by complainants shall be assessed, in each context, including the linguistic implications and whether assistance is needed in filing the grievance, the arrangements for publicity of the mechanism and adequate information on its functioning. In addition, once the motion for a resolution has been approved, Eni communicates and discusses it with the applicant, requesting observations or alternative solutions, always ensuring that they are tracked and archived.

In the event of dissatisfaction, Eni examines the reasons and, where necessary, activates the examination and response process, also with the involvement of third parties. In the relevant Countries, Eni carries out special reviews on the state of grievances every three months, monitoring specific indicators; in order to increase confidence in the mechanism, the following are evaluated: whether and how to make the results of these indicators accessible to communities; the best forms of communication; the growth of awareness and assistance in compilation through periodic discussion with communities.

## ACTIONS AND METRICS<sup>166</sup>

All processes and tools for identifying impacts, positive or negative, include preventive and mitigation programs and actions or to remedy them in the event that they become effective. For each Environmental and Social Impact Assessment (ESHIA), an Environmental and Social Management Plan is drawn up, which integrates elements related to respect for human rights, describing the actions to mitigate these impacts during the life cycle of the project and sharing it with the authorities to monitor its progress. As regards the assessment of health impacts, it is either integrated into the ESHIAs or is carried out separately through HIA/VIA. In the event that potential health impacts deriving from operational activities are identified, this finding is disclosed to the identified stakeholders, in accordance with the applicable local legislation. A Mitigation and Monitoring Plan is therefore drawn up, to ensure that the significant impacts identified

are adequately managed and the progress of activities is periodically monitored. At the end of the projects' implementation, compliance with the documents, including environmental and social issues, is verified and any deviations lead to the definition of corrective actions. In 2024, the implementation of the Action Plans (available on [Eni website](#)) relating to the HRIA/HRRA carried out in previous years continued and their monitoring was ensured. The development of projects related to the use of natural resources may require the acquisition and/or use of areas from local communities. For all individuals who have activities or reside in Eni's areas of activity, the adoption of fair, transparent and sustainable compensation methods is guaranteed (by applying the IFC PS5 international standard on involuntary resettlement) even when the standard of the Country of presence does not allow compensation that can restore the impacted communities (Project Affected People, PAP) in an appropriate manner.

In this context, the main actions in 2024 were carried out in: (i) Mozambique, in 2023, for the construction of a future bio-oil production plant, based on the Country's legislation, those PAPs being potentially impacted by the relocation of their agricultural activities have already been compensated, and the definition of an additional compensation scheme for PAPs in line with IFC international standards is under development; (ii) Congo, where preliminary studies were launched for the minimization of impacts on communities in the context of the development of infrastructure of a new LNG project<sup>167</sup>. It is also specified that each action plan has a monitoring plan followed by an intermediate and a final evaluation to measure the effectiveness of the actions.

## Security activities

Eni manages its security operations in compliance with the international principles which are also included in the Voluntary Principles on Security and Human Rights promoted by the Voluntary Principles Initiative<sup>168</sup> (VPI), and expects its Business Partners to manage these activities, in collaboration with and/or in the interest of Eni, in full respect of the human rights and fundamental freedoms of individuals. Eni has been a "full member" of the VPI initiative since 2022 and in 2024, it has conducted a series of actions aimed at confirming its commitment and increasing the level of awareness in the management of potential impacts on the communities in which it operates, such as, for example, the application of the Conflict Analysis Tool (a tool developed by VPI to analyze the causes of conflicts in a given area/Country) in Mozambique, through interviews at local level and developing an action plan for mitigation actions. Since 2009, Eni has been promoting a training programmes for public and private security personnel in those

(166) For the methodology and scope of consolidation, see the chapter Eni's [Reporting principles and Criteria](#).

(167) The activities discussed in this chapter are those managed directly by Eni, in the assets operated. Therefore, resettlement operations carried out for business projects in which Eni holds a stake but which are managed by a third-party operator, such as the activities carried out in 2024 in Kazakhstan and in the Rovuma LNG project in Mozambique, are not dealt with.

(168) A multi-stakeholder initiative that brings together the main energy companies in the protection and promotion of human rights.



Countries where it operates in order to disseminate the corporate best practices in line with international principles. In 2024, the "Security & Human Rights" Workshop was held in Mozambique, in Maputo, with the participation of senior Mozambican civilian and military officials, as well as representatives of international organizations and companies, and in Pemba, with specific training sessions, including practical ones, involving both public security operators and private security operators working at Eni sites. The main objective was to promote human rights in security activities, sharing the fundamental principles on the use of force and weapons and preventing violence, with a focus on the protection of women. Particular attention was given to respect for human dignity and diversity, which are essential for the protection of company assets

in collaboration with local authorities. Overall, the workshop involved over 200 participants, including 153 from public and private security forces. In addition, during 2024, a project for the implementation of training workshops on human rights for local security forces was finalized, by the subsidiary's Security Managers, in order to increase the number of security forces trained, this took place in addition to the traditional annual training course. The project kick-off was carried out in 10 Countries having the highest level of risk of human rights violations, as defined by Eni's **risk-based model** 2023: Congo, Tunisia, Mexico, Ivory Coast, Kenya, Iraq, Nigeria, Libya, Algeria, Egypt; 716 people were involved, including Public and Private Security Forces. The number of Countries with armed guards protecting the sites is 9.

## HUMAN RIGHTS SECURITY

|  | Units of measurement | 2024 | 2023 |
|--|----------------------|------|------|
| Security personnel trained on human rights                           | (number)             | 869  | 170  |
| Security personnel (professional area) trained on human rights       | (%)                  | 92   | 90   |
| Security contracts containing clauses on human rights <sup>(a)</sup> |                      | 97   | 100  |

(a) The percentage change 2024 vs. 2023 refers to 3 contracts being updated to ensure the inclusion of specific clauses.

## Local Development Projects of the year and community engagement

Among the main projects carried out in 2024, there are initiatives aimed at promoting: (i) access to energy in Côte d'Ivoire, Mozambique, Congo and Angola through the distribution of improved cooking systems and in Tunisia through the installation of photovoltaic panels; (ii) economic diversification through support to sustainable agriculture and/or fishing practices in Mexico, Egypt, Italy and Mozambique, and local handicrafts in Côte d'Ivoire; (iii) access to primary and secondary education in Mexico, Ghana, Mozambique and Iraq, and vocational and tertiary training in Côte d'Ivoire, Egypt and Libya; (iv) access to water through the construction and maintenance of water supply systems in Egypt, Congo and Mozambique and the construction of water treatment plants in Iraq; (v) the protection of the territory through environmental awareness and planting activities in Italy,

Indonesia, Ghana and Mozambique. As part of its health development projects, in 2024, initiatives were carried out by Eni in 13 Countries, such as Angola, Côte d'Ivoire, Egypt and Mozambique, through the strengthening of the skills of health personnel, the construction and rehabilitation of health facilities and their equipment, information, education and awareness of the populations involved on health issues. In addition, Eni has carried out redevelopment of the health system in Italy, with the aim of contributing to the strengthening and resilience of local structures in Gela, Milan and Pavia. For the next four years, Eni has allocated investments of over €362 million for local development. Finally, during 2024, 61 grievances were received and 43 were resolved (of which 34 were received during 2024), which mainly concerned: community relations management (the most recurrent category), management of environmental aspects, land management and supplier management.

## LOCAL DEVELOPMENT INVESTMENTS AND GRIEVANCES<sup>(a)</sup>

|   | Units of measurement | 2024 | 2023 |
|---|----------------------|------|------|
| Local development investments by sector of intervention | (M€)                 | 88.8 | 95.0 |
| Access to energy  |                      | 0.7  | 3.5  |
| Economic diversification                                |                      | 46.0 | 35.2 |
| Education and vocational training                       |                      | 25.4 | 26.1 |
| Access to water and sanitation                          |                      | 0.9  | 2.2  |
| Life on land  |                      | 3.9  | 6.9  |
| Health  |                      | 7.1  | 10.7 |
| Compensation and Resettlement <sup>(b)</sup>            |                      | 4.8  | 10.4 |
| Number of grievances                                    | (number)             | 61   | 140  |

(a) The items in the table are included in Eni's 2024 consolidated financial statements, in the item ► **Note 14 "Intangible assets"** and in ► **Note 30 "Costs - Purchases, services and other charges"**.

(b) The figure includes expenses for resettlement activities, which in 2024 amounted to €4.8 mln mainly related to non-operated assets (€4.6 mln in Mozambique for the Rovuma LNG project, €0.2 mln in Kazakhstan for the Berezakova project) and €0.01 mln in Ghana.

## CLIENTS AND CONSUMERS

This chapter focuses on the B2C customers of Plenitude - Benefit Corporation (Società benefit), and in particular on the more than 10 million retail customers to whom Eni offers energy, energy efficiency solutions and sustainable mobility. This company has integrated renewable electricity generation, energy sales and energy solutions for households and businesses into its business model, as well as an extensive network of proprietary charging points for electric vehicles. The emphasis of this chapter is on these customers due to the long-lasting contractual relationship they have, unlike Eni's other business lines.

### POLICIES<sup>169</sup>

Eni's commitment to the transparent management of relations with customers and consumers is included in the [ECG Code of Ethics](#), which recalls best practices and the principle of professional loyalty for its commercial policies and strategic choices.




The Code also reiterates that business relations are focused on the needs of the customer, always putting him in a position to be able to choose freely and consciously. In the [ECG Policy Respect of Human Rights in Eni](#), the following process are described: the integration of the Human Rights issue in all business lines and in external relations with Third Parties (Human Rights Due Diligence Model); complaint mechanisms and other reporting channels; training initiatives for the function responsible for the processes impacted by the Salient Human Rights Issue; as well as awareness-raising initiatives dedicated to Third Parties. The ECG Privacy and Data Protection Policy identifies the ways in which Plenitude guarantees the protection of the personal data of customers and all those with whom Eni establishes relationships in order to: guarantee the correctness and transparency of the processing of personal data and provide rules for data retention and the management of reports related to privacy topics from customers. In addition, Policy

[ECG Consumer Protection & Green Claims](#): (i) reiterates the need to comply with the rules and principles on consumer protection and correct environmental and sustainability communication (Green Claim and Sustainability Claim), reinforcing awareness of the impact that actions, behaviors and omissions that violate the Consumer Protection Legislation, can have on Eni; (ii) identifies the tools aimed at preventing the risk of violation, even "unknowingly", of the Consumer Protection Legislation; (iii) disseminates the culture of compliance in the field of consumer protection, helping to facilitate the identification and reporting by Eni's people of any actions/conducts that may constitute a violation, in line with the company's regulatory instruments on the subject. Finally, the **internal regulatory framework** defines procedures of the commercial process, emphasizing compliance with all the rules put in place to protect fair competition and respect for the right of consumers to receive clear, truthful and complete information on the products and services offered.

### TARGETS AND COMMITMENTS

The defined targets, in line with the policies, are at the heart of strategic choices and the desire to build commercial relationships focused on customer needs, always putting them in a position to be able to choose freely and consciously, also through correct commercial communication. To this end, Plenitude is equipped with an organizational function responsible for verifying compliance with consumer protection legislation for all its business initiatives and customer communications, with the aim of providing clear, complete, truthful and non-misleading information.

Customer service performance is monitored on a monthly basis as part of business reviews through specific KPIs, tracking alignment with the defined target. Annual meetings are also organized with national representatives of consumer associations, to present business strategies and specific insights on issues of interest to end consumers.

| Target  | Target year | 2024 Performance | Base year and relative reference value | Notes (scope, methodology, evidence)  |
|---|-------------|------------------|--|---|
| 33,000 installed proprietary EV Charging Points     | 2028        | > 21,000         | 31/01/22: 6,500 points                 |  Absolute target defined in line with the progressive expansion of the electric mobility market in Italy and Europe, leveraging Plenitude's Retail business, partnerships, as well as synergies with Enilive. Scope: e-mobility business area  |
| 3.5 times Net Promoter Score (Retail Italy) of 2018 | 2025        | 2.71 times       | 2018: N/A <sup>(a)</sup>               |  Relative target defined on the basis of customer experience improvement forecasts thanks to the introduction of new technologies and a customer service remuneration model increasingly focused on the quality of the service provided to the customer; Scope: Retail Italy   |
| 90% New contracts signed digitally in Europe        | 2025        | 85%              | 2023: 80%                              |  Absolute target defined on the basis of the plan for the progressive digitization of contract subscriptions at physical sales channels and the planned implementation of new digital acquisition channels. Scope: new electricity and gas supply contracts signed by B2C customers in Italy, France, the Iberian Peninsula, Greece, Slovenia contracted digitally |

(a) The reference value is not reported as it is market sensitive and not comparable between companies due to different methodologies.

(169) For further references, see [The regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).



## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROs)

### Material IROs and interaction with the company's strategy

Eni extends its range of action to end markets, marketing gas, electricity and products to local markets and to retail and business customers, to whom it also offers energy efficiency and sustainable mobility services. Among these, the main material IROs linked to stakeholders downstream of Eni's value chain, refer to Plenitude customers, due to the presence of a contractual relationship, which potentially, due to the occurrence of accidental events, can have negative material impacts related to unclear advertising campaigns or misleading or aggressive business practices, that can mislead customers or make a purchase decision that they would not have made otherwise. At the same time, Eni's offer of quality products and services in line with customer needs can generate positive impacts in terms of satisfaction also thanks to adequate listening and engagement channels. Particular attention is therefore given to: innovation and digitalisation processes; integration of ESG aspects along the value chain and customer satisfaction and centrality, promoting a correct and transparent approach and the offer of quality products and services, in line with their needs and in support of the energy transition. This last aspect plays an important role, not only because Eni wants to establish itself as a best practice on the market, but also because of the correlation between customer satisfaction and churn rate and with the rate of acquisition of new customers, with obvious effects on the company's performance. Among customers, those most exposed to risks are identified also in order to define initiatives to mitigate any impact that may arise from specific incidents; for example, support is activated for those who are financially vulnerable<sup>170</sup>. No material risks (see [Materiality](#) section) have been identified at group level with regard to consumers<sup>171</sup>, net of the transversal risk of Cyber Security detailed in the [Business Conduct](#) chapter. In line with the identified target (see the [Targets and commitments](#) section of this chapter), the development of charging points for electric vehicles<sup>172</sup> represents a business opportunity for the development of services to support sustainable mobility.

## CUSTOMER ENGAGEMENT

Within Plenitude there is a team dedicated to studying the market and listening to customers<sup>173</sup>, in order to identify their needs and areas for improvement, consumption trends, socio-economic trends and main concerns. Every year, multiple market surveys are carried out, both qualitative and quantitative, through different channels (online, telephone or personal), thanks to the support of research institutes or

specialized companies active in Italy and abroad, in compliance with the sector quality standards. During 2024, more than 70 research projects were carried out, involving over 130,000 actual and potential customers, and an initiative to listen to calls made to the toll-free number also continued. Customer satisfaction (i.e. the percentage of customers who express a rating of more than 7 out of a maximum of 10) in terms of overall satisfaction with Plenitude as an energy supplier is continuously monitored. To assess the effectiveness of engagement channels, other specific KPIs are also monitored, such as the Net Promoter Score (which measures the percentage of customers who would recommend Plenitude as an operator) and the complaint rate. Dialogue and continuous discussion with Consumer Associations is also promoted, to continuously improve customer satisfaction and the quality of the service offered. This dialogue takes place through dedicated channels, such as, for example, the Joint Conciliation Protocol, an out-of-court dispute resolution procedure between the Company and customers in accordance with the Alternative Dispute Resolution method. Consumer Associations are guaranteed the possibility of reporting potential service failures and product malfunctions on behalf of customers through a telephone service and an ad hoc web area. Finally, Plenitude actively participates in meetings with the competent authorities and bodies, at national and local level, in case of consultations and hearings, also on the protection of vulnerable customers (see the [Actions](#) section for more details). The operational responsibility for ensuring that involvement takes place and that the results affect the company's approach is held by the Director of the Italian retail market, in collaboration with the support functions.

### Remediation processes and whistleblowing channels

Plenitude handles complaints<sup>174</sup> in accordance with the regulations of the Regulatory Authority for Energy, Networks and the Environment (ARERA - Autorità di Regolazione per Energia Reti e Ambiente). Complaints are analyzed qualitatively and quantitatively to understand customer issues and initiate corrective actions. Every three months, the multidisciplinary Customer Protection Committee monitors the quality indicators of the partners' commercial performance and defines the related action plans. For complaints against business partners, specific sanctioning procedures are applied, such as penalties for unsolicited activations and preliminary investigations for contractual violations present in the mandate, assessed by the Penalty Committee. Reports can be sent by customers, either through remote channels (reserved area/app, chat, call center, postal service), or through Italian Sign Language (chat and call center), or through direct and indirect physical channels in the area. The channels

(170) The definition of vulnerable customers also includes Electricity and Natural gas customers as defined by Regulatory Authority for Energy, Networks and the Environment (ARERA - Autorità di Regolazione per Energia Reti e Ambiente).

(171) The analysis considers all risks arising from impacts and dependencies.

(172) This opportunity is explored in the [Climate Change](#) chapter.

(173) For further information on stakeholder expectations and engagement, see the [Stakeholder Engagement](#) chapter.

(174) For further information on the process of assessing the potential impacts on Human Rights and identifying appropriate remedial measures, consistent with all categories of stakeholders, see the [Human Rights for Eni](#) chapter.

available to customers are described on [eniplenitude.com](https://eniplenitude.com), bills and commercial and contractual material. Regardless of the channel used, Plenitude guarantees the receipt, analysis and processing of reports, including anonymous ones, ensuring maximum confidentiality to avoid retaliation<sup>175</sup>. Plenitude trains and informs its service providers, including customer care and call center operators, sharing company procedures and offering training sessions with quality monitoring surveys. In addition, to ensure adherence to Plenitude's standards and expectations, checks are also carried out on call and customer management, such as listening to sample calls with score and feedback shared with the partner.

Complaints and requests for information are monitored daily through a dedicated dashboard and managed by a team of internal resources and specialized external suppliers. Control systems are provided to verify the quality of practices and identify training gaps and ideas for improvement. The Customer Feedback program uses an ad hoc platform to deliver surveys, measure satisfaction KPIs and interact with critical customers, integrating their suggestions into the company system. The effectiveness of these tools is monitored in line with the commercial quality standards established by ARERA. Unanswered complaints, response times, motivations, as well as any recurrences, are analyzed to understand the underlying causes of the reports and complaints. Finally, the First Call Resolution indicator, i.e. the percentage of reports that were resolved on the first call, and Self-Care, the percentage of transactions carried out independently by customers out of the total transactions requested, are monitored. In regards to cases of human rights violations, no incidents relating to the category of customers have been reported (see the [Human Rights for Eni](#) chapter).

## ACTIONS TAKEN ON MATERIAL IROs

Plenitude has provided for the implementation of several actions to remedy the negative impacts it could have on customers and consumers, the effectiveness of which is monitored through operational indicators (Rate of unsolicited activations, complaint index, NPS, etc.) on a monthly or weekly basis.

### Actions in the event of disservice

In addition to the compensations already provided for by the sector regulations, Plenitude has adopted internal procedures to mitigate the effects on customers of any disservice due to the Company that occur during the management of individual services (e.g. contractual transactions such as switches, activations, terminations, product changes) or the supply service (e.g. regular invoicing, payment registration, etc.). These procedures provide, for example, for the

definition of compensations calculated considering the type and duration of the disservice or refunds of costs incurred. Each case is specifically evaluated and, where the conditions are met, is then addressed with the client to identify a shared proposal, in order to avoid the the issue from persisting.

## Customer protection and fraud management

Plenitude adopts an approach of customer protection, in case of unfair commercial practices (even if only alleged) by assuming, where possible, all the resulting charges. It has signed, with the associations belonging to the National Council of Consumers and Users, the protocol of unsolicited activations, to strengthen the measures put in place to protect consumers and, more generally, in relation company's to conduct related to unfair commercial practices. In addition, there is Joint Alternative Dispute Resolution, an alternative resolution procedure that has the advantage of offering a quick, simple and out-of-court solution to disputes between consumers and businesses. Plenitude is also committed to protecting its customers against any unfair commercial practices by third parties, such as unsolicited activations. Following some cases of disputed impacts on privacy in the context of teleselling and telemarketing activities, Plenitude has prepared a remediation plan to strengthen controls at its sales network and related adaptation of systems, as well as measures to protect the personal data of its customers. At a general level, in the data protection area, Plenitude organizes the processing of personal data and the management of confidential information using an interdisciplinary approach to identify the best methods, in compliance with the principles and requirements established by European Regulation 2016/679. Furthermore, following some disputed impacts for unilateral changes in price conditions and information gaps by the Portuguese energy sector regulatory authority, Eni has actively collaborated with the authority itself, reaching 35 out-of-court agreements with persons affected by the disputed company's conduct. In order to ensure constant monitoring of the quality of the service, the trend of activations of commodity and non-commodity contracts on the systems is monitored, with particular focus on the failure to activate them. The progress of the supply point activation contracts is subject to reporting and any critical issues that may arise after the signing of the customer's contract is monitored, preventing the activation to become effective. Finally, in relation to fraud attempts, Plenitude has put in place numerous initiatives to support customers who are victims of potential scams, providing them with some specific tools for defending and verifying the identity of those who contact them,

(175) For more information, please refer to page <https://eniplenitude.com/info/segnalazioni-illecite>.



including: information reports of fraud attempts, a dedicated toll-free number to handle reports related to suspicious call and a service to verify that the number from which they are contacted is actually attributable to a Plenitude operator. The latter, since its activation in 2020, has received more than 1,887 reports during 2024, of which more than 99% resulted related to numbers not registered in the Single Register of Call Center Operators and therefore in violation of the law and potentially fraudulent.

## Customer service and initiatives for vulnerable customers

With regard to positive impacts, Eni has launched and completed in 2023 the introduction of a new Customer Relationship Management (CRM) system, to improve the customer & user experience, reducing the information required from customers, anticipating and automating controls, and simplifying activities for operators. The update of the Plenitude app has been completed to make all its features accessible to blind and visually impaired people. For deaf customers, in addition to chat, TELLIS, a customer service that allows you to communicate through Italian Sign Language, with qualified interpreters connected remotely, has been active since 2022. From internal analyses and on the basis of the ministerial initiative, Eni has identified young people among the financially vulnerable customers; indeed, Plenitude is listed among the top 50 partner companies of the National Youth Card, an initiative of the Department for Youth Policies and the Universal Civil Service, which offers to young Europeans living in Italy between 18 and 35 years old, discounts on the supply of gas and electricity from renewable sources covered by the Guarantee of Origin, a discount on a pay-as-you-go recharge through the Plenitude On the Road app and a promotion on boilers and air conditioners. In addition, following the end of the gas protected market in December 2023, Plenitude has designed an offer with the same characteristics of protection as the previous one dedicated also to non-vulnerable customers, to ensure in an initial period a level playing field for those who did not subscribe

to the free market offer. To manage significant customer impacts, Plenitude has teams of expertise in the commercial department (e.g. Customer Operations, Value Stream Customer Experience Management) and in the legal department (e.g. Data Protection, Corporate Liability Compliance and Ethic Code Values, Consumer & Brand Identity Protection). Plenitude allocates specific budgets to implement action plans related to customer management. To this end, Plenitude defines specific OpEx (non-material) that include different types of costs related to the customer's management activity (including Customer Contact, Back Office, CRM, Billing and Metering, Credit Management).

The amount of future financial resources is defined and allocated on the basis of the evolution of the customer base and related support services and is not disclosed as it is not financially relevant/confidential.

## Customer engagement in the transition

As far as activities related to the efficient use of energy are concerned, Plenitude is committed to accompanying the customer towards energy awareness providing them with personalized advice based on their behavior, within the web area and app reserved for the customer, to raise awareness of their energy profile. In 2024, a tool was also developed that allows the customer to estimate the production of electricity from residential photovoltaics system during the offer evaluation phase to calculate the potential savings and provide a view of the potential self-consumption. The "Plenitude Together" loyalty program (launched in December 2022), in addition to building a lasting and valuable relationship for customers, offers them useful initiatives to increase awareness and knowledge about energy efficiency. The 2025 goal is to maintain a high participation rate (more than 80%), continuing to involve them in the energy transition path. In fact, in 2024, 87% of members interacted with the program at least once and more than 200,000 people deepened their knowledge of energy efficiency (up to 27% compared to 2023).

# Business conduct

## POLICIES<sup>176</sup>

Eni [Code of Ethics](#) reaffirms the culture of responsibility, legality, transparency, the commitment to act on all occasions with correctness, integrity and equity, in compliance with contractual commitments and the adoption by Eni of rules and controls to prevent and combat the risk of corruption in the performance of activities. The [Management System Guideline Anti-corruption](#), publicly accessible, underlines the prohibition, without exception, of all forms of corruption, active, passive, direct and indirect, in favor of and by anyone (Eni Persons, third parties at risk and anyone acting in the interest of Eni), defining the applicable mechanisms for the prevention of corruption and money laundering, as well as the rules for ascertaining the ethical and reputational reliability of potential counterparties through the performance of preventive checks/anti-corruption and anti-money laundering due diligence, the provision of specific contractual clauses and/or declarations to third parties and the promotion of training and awareness-raising initiatives for Eni's people and third parties.

The public document [Whistleblowing reports management received by Eni SpA and by its Subsidiaries](#) provides for the adoption of a system to encourage the reporting of misconduct and to guarantee the confidentiality of the identity of the whistleblower

and other protected parties, protecting them from retaliatory consequences. Finally, the report [Eni's responsible engagement on climate change within business associations](#) examines in depth the positions on climate change issues that Eni considers essential in the context of climate change advocacy. With regard to the management of suppliers, please refer to [ECG Policy Respect for Human Rights in Eni](#) and the [Supplier Code of Conduct](#), described in the section [Workers in Eni's value chain](#).

## TARGETS AND COMMITMENTS

Eni, in line with its medium/long term sustainable supply chain strategy, has defined specific targets for the supplier management and sourcing process. These indicators are monitored periodically and, consequently, corrective actions are defined/implemented. In addition to the targets listed in the table, Eni has defined commitments on business conduct aspects, shared with its stakeholders, relating to the maintenance of ISO 37001:2016 and 37301:2021 certifications, the continuous improvement of the Anti-corruption Compliance Program and the training on the Anti-corruption Compliance Program for medium and high-risk personnel.

| Target  | Target year | 2024 Performance   | Base year and relative reference value |   | Notes (scope, methodology, evidence)  |
|---|-------------|--|--|---|---|
| Keep ESG assessments in procurement processes for more than 90% of the Italian awarded contracts                        | 2025        | Procurement processes with ESG assessment for 94% of Italian awarded contracts | 2023 85%                               | ● | Relative target <sup>(a)</sup><br>Boundary: purchasing procedures within the MSG Procurement Italy.           |
| Procurement processes with ESG assessment for over 90% of foreign awarded contracts                                     | 2026        | Procurement processes with ESG assessment for 65% of foreign awarded contracts | 2023 20%                               | ● | Relative target <sup>(b)</sup><br>Boundary: purchasing procedures within MSG Procurement foreign subsidiaries |
| 100% of strategic worldwide suppliers assessed on the path to sustainable development                                   | 2025        | 80% of strategic suppliers worldwide   | 2024 80%                               |   | Relative target <sup>(c)</sup><br>Boundary: Eni's strategic suppliers   |
| 90% of active contracts are awarded to suppliers registered on Open-es, maintaining over 65% in the intermediate years. | 2027        | New 2024 target <sup>(d)</sup>   | 2024 82%                               |   | Relative target <sup>(e)</sup><br>Boundary: contracts within MSG Procurement Italy and foreign subsidiaries   |
| 3,000 foreign local suppliers involved in Open-es   | 2026        | 2,600 foreign local suppliers involved in Open-es                              | 2023 1,600                             | ● | Absolute target <sup>(f)</sup><br>Boundary: suppliers of foreign subsidiaries                                 |

(a) Ratio between the total value of awarded contracts in Italy subject to ESG assessment compared to the value of total awarded contracts in Italy.

(b) Ratio between the total value of foreign awarded contracts subject to ESG assessment compared to the value of total foreign awarded contracts.

(c) Ratio between the total number of strategic suppliers analysed on the basis of their ESG positioning and the total number of strategic suppliers (i.e. those industrial groups that hold 80% of the contract value in place with Eni).

(d) This target was updated in 2024 in view of the early achievement of a target set for 2025.

(e) Ratio between the total value of active contracts assigned to suppliers registered on Open-es and the total value of active contracts.

(f) It refers to the total number of foreign local suppliers managed by the subsidiaries and registered on Open-es.

(176) For further references, see the chapters [The regulatory system](#), and Eni's [Reporting principles and criteria/Policies](#).



## BUSINESS CONDUCT

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROs)

#### CONDUCT, BUSINESS CULTURE AND CORRUPTION PREVENTION

Eni's activities, which take place in many Countries, are subject to the potential risk of incurring corruption in the business contexts in which Eni operates, nationally and internationally. The corruption phenomenon potentially is an obstacle to sustainable development and, at the same time, may distort competition and undermine trust in the economic system and institutions. The economic consequences can be financial losses, reduced business competitiveness and a contraction in investment. In addition, corruption can undermine economic efficiency and the equitable distribution of resources, leading to slower economic development. The occurrence of this phenomenon, also in light of the strong reputational impact associated with it, may lead to consequences not only on employees, but also on various categories of stakeholders who have economic, contractual and institutional relations with the Company. In order to prevent such potential impacts, Eni adopts and implements, in Italy and abroad, the Anti-Corruption Compliance Program, developed from a risk-based perspective, in line with national and international regulations and with applicable best practices and guidance, and has defined and implemented a structured Compliance Risk Assessment and Monitoring process, detailed in the following sections, aimed at identifying, assessing and tracking corruption risks in the context of its business activities and guiding the definition and updating of control controls. The commitment in this area confirms the importance for Eni to carry out its business with loyalty, fairness, transparency, honesty and integrity and in compliance with the laws, regulations, similar mandatory norms, international standards and guidelines, both national and foreign, to which the Company is subject.

#### TRANSPARENCY AND FAIR USE OF RESOURCES

Transparency is a corporate value for Eni which for this reason it is committed to the voluntary disclosure of payments to governments and to the fight against all forms of corruption, promoting the responsible use of financial resources in line with Sustainable Development Goal 16 of the United Nations 2030 Agenda. As part of its business activities, Eni works closely with governments around the world, which are often the recipients of important economic transactions. Payments to governments, therefore, also represent socio-economic support to States and their proper management contributes to the prevention of potential corruption phenomena, with possible negative repercussions also on communities.

#### INSTITUTIONAL ENGAGEMENT ACTIVITIES

As part of its partnerships and advocacy activities, Eni dialogues with policymakers, national, European and international institutions, advocacy organizations, trade organizations and confindustrial

associations, enhancing its commitment to the energy transition path both with regard to traditional activities and with regard to new businesses. In this context, Eni contributes with its experience as an international energy company to the definition of policies and norms aimed at promoting the transition to Net Zero, taking into account the social, economic and environmental aspects of the realities in which it operates.

#### CYBER SECURITY

Eni's activities, as for many other companies in a digitally interconnected and technological world, are exposed along the entire value chain to the risk of potential cyber security incidents, which can lead to the loss of data confidentiality as a result of the dissemination of information of employees, customers or business partners and to the detriment of the financial community, posing a threat to the security and privacy of those involved. Similarly, the unavailability of IT systems to support the provision of services to customers and business partners could also have significant impacts on the latter. Finally, the possible propagation of a cyber security incident to the computer systems of Eni's suppliers and partners could have serious impacts on the latter.

### ACTIONS TAKEN ON MATERIAL IROs

#### CONDUCT, BUSINESS CULTURE AND CORRUPTION PREVENTION

Eni [Code of Ethics](#) – available on the website for all Stakeholders – reaffirms integrity and transparency among the values that characterise the commitment of Eni's people and all third parties working with the Company (see the chapter [The Regulatory System](#)). The Code is also addressed to all third parties, such as suppliers, commercial and industrial partners, from whom equally socially responsible behavior is expected, supported by the development of adequate programs and ethical safeguards. In the event of non-meeting the expectations of the various stakeholders, appropriate measures are taken. Eni strongly believes in the dissemination, at all levels of the Company, of a culture oriented towards legality and compliance with the rules, values of integrity and the principles of conduct and control adopted by the Company and defines training and information initiatives with respect to the needs identified for the various population targets, through the Company intranet which is used as a training channel (Enicampus) and dissemination (EticApp) of ethical and compliance content to all Eni's people.

#### *The Anti-Corruption Compliance Program*

Since 2009, Eni has adopted and implemented the Anti-Corruption Compliance Program: a consistent system that is constantly updated with rules, controls and organizational controls, in compliance with current national and international regulations and in line with applicable best practices and guidance, aimed at preventing corruption and money laundering. At the regulatory level,



the Anti-Corruption Compliance Program is represented by the [Anti-Corruption Management System Guideline](#) and by detailed regulatory tools for the regulation of risky activities and the definition of control tools, which Eni makes available to its people to prevent and combat the risk of corruption and money laundering (so-called "Anti-Corruption Compliance Program"). Subsidiaries, in Italy and abroad, must adopt, by resolution of their Board of Directors (or equivalent body), the Anti-Corruption Regulatory Instruments issued by Eni. In addition, companies in which a non-controlling stake is held are encouraged to comply with the standards defined by Eni, adopting and maintaining an internal control system in line with legal requirements. Eni has set up a centralised organisational function that provides specialist assistance in anti-corruption and anti-money laundering matters to Eni SpA and its subsidiaries, with particular reference to the assessment of the reliability of potential third parties at risk (so-called "anti-corruption and anti-money laundering due diligence"), in the management of any critical issues/red flags and in the definition of related mitigation measures, including the formulation of contractual compliance safeguards and, for the most risky cases assessed on a case-by-case basis, in the request to the counterparty to adopt an anti-corruption compliance program. In 2024, the Company or members of senior management were not involved in any criminal proceedings that resulted in a final conviction for violations of anti-corruption regulations (for further information on the Group's disputes, please refer to ► [Note 28 "Guarantees, Commitments and Risks"](#) of the Consolidated Financial Statements). Eni has also adopted a structured process of Compliance risk assessment and monitoring aimed at: i) identifying, assessing and tracking corruption risks in the context of its business activities and guiding the definition and updating of the control measures provided for in the regulatory instruments; ii) periodically analyse the trend of the corruption risks identified, through the performance of controls and the analysis of risk indicators aimed at ensuring compliance with regulatory requirements and the effectiveness of the monitoring models; iii) contribute to the identification of Eni employees exposed to the greatest risk of corruption by considering - in addition to the drivers used in the methodology for the systematic segmentation of Eni's people for training purposes - also the degree of exposure of the professional family to which they belong to the activities at risk of corruption<sup>177</sup>. The risky activities identified by Eni, due to its operational and organisational context, include, but are not limited to: (i) contracts with third parties at risk of corruption and money laundering (e.g. business associates, including intermediaries and consultants, joint venture partners, brokers, counterparties in real estate management transactions, operators of the commercial network, suppliers, etc.); (ii) transactions for the purchase and sale of shareholdings, companies and business units, mining rights

and securities, etc., and joint venture contracts; (iii) non-profit initiatives, initiatives for the territory and initiatives for the health of the communities, sponsorships; (iv) sale of goods and services, trading and/or shipping operations; (v) selection, recruitment and management of human resources; (vi) gifts and hospitality; (vii) relations with relevant persons (including public administrations and public officials). Compliance risk assessment and Compliance Monitoring activities are planned annually on activities and functions identified according to a risk-based approach, transversal to several functions. Risk assessments are therefore carried out with reference to the Compliance Areas and the related risk activities (or individual components) on the basis of the relevant regulatory requirements and from a risk-based perspective. As part of this assessment process, aimed at determining exposure to corruption risk, various risk indicators are considered, also relating to the business processes affected by the identified risk activities. During 2024, the Compliance Risk Assessment activities involved the anti-corruption area as a whole, also pre-selling in-depth exercises for certain risky activities including "purchase and sale of goods and supply of services", "purchase and sale of real estate", "transactions for the purchase and sale of exploratory mineral rights". Compliance Monitoring interventions, on the other hand, focused, in 2024, on "Joint Ventures", "Initiatives for the territory and initiatives for the health of communities". The results of both activities confirmed the expected level of risk, the adequacy of the mitigation measures implemented and the effectiveness of the compliance model adopted.

### *Training and communication activities*

Eni strongly believes in the dissemination, at all levels of the Company, of a culture oriented towards legality and compliance with the rules, values of integrity and the principles of conduct and control adopted by the Company and defines training and information initiatives with respect to the needs identified for the various targets of Eni personnel. The relevant activities within the Anti-Corruption Compliance Program and the planning of these activities for subsequent periods are the subject of an annual report, an integral part of the Integrated Compliance Report towards the management and control bodies of Eni SpA<sup>178</sup>. In particular, on the occasion of the meetings of the Board Committees, a series of in-depth sessions were held open to the participation of all Directors and Statutory Auditors, on issues of general interest concerning the business model and strategies, the approach and sustainability model in areas such as people's health, human rights, transparency and the fight against corruption (also on the occasion of participation in a session of Eni's "Anti-corruption Compliance Program"), the main innovations regarding the corporate regulatory system, with a focus dedicated to the innovations introduced in the framework of the internal control

(177) The segmentation methodology, aimed at identifying the recipients of the various training initiatives, does not identify functions at risk but takes into account for each resource the qualification, the professional family to which they belong (e.g. Procurement, Sales, CFO, etc.) and the relative exposure to activities at risk of corruption, as well as the Country risk and the specific risk of the Company.

(178) On the role of the Board of Directors in relation to the ICRMS and business conduct issues, see the ► [Governance](#) section.



and risk management system, which is an integral part of the corporate strategy. Eni personnel, in line with the provisions of the regulatory instruments, must also be informed about the applicable laws, the principles of the [Code of Ethics](#) and other internal regulations on the subject, in order to be aware of the various risks, the consequences that may arise in the event of a violation of the same, and the actions to be taken to combat corruption and money laundering. In order to optimise the identification of the recipients of the various training initiatives, a methodology is used for the systematic segmentation of Eni's people on the basis of the level of corruption risk according to specific risk drivers such as Country, role, qualification, professional family. Each employee is the recipient of a specific training program corresponding to the level of risk of corruption and detailed with respect to the needs of their role and activities (anti-corruption training activities are aimed at covering 100% of the resources at risk)<sup>179</sup>. The training program is divided into online courses and classroom training such as general workshops and "job specific training" intended for professional areas with a specific risk of corruption. These courses provide an overview of the anti-corruption and anti-money laundering laws applicable in Eni, illustrated the tools for recognizing the areas of corruption and money laundering risk and the related control checkpoints of Eni. In addition, the methods of reporting, with respect to any suspected or known violation of the anti-corruption and anti-money laundering laws or the Anti-Corruption Compliance Program, are described.

In line with the principle of top level commitment, members of Eni's top management, directors/heads of business and CEOs (or equivalent) of subsidiaries also participate in training activities; these subjects usually introduce the anti-corruption workshop, underlining its importance and the strong correlation that must exist between compliance and business. In addition, a three-day training event is planned for Chief Executive Officers (or equivalent) of subsidiaries in Italy and abroad and their first line, with the aim of supporting the development and consolidation of their top role. During these events, compliance and risk mitigation issues are explored in depth, including through role playing and discussion of complex cases, with the involvement of the Integrated Compliance, Internal Audit and Corporate Affairs and Governance functions. Among the main training activities carried out in 2024, the provision of the online course "Code of Ethics, Anti-Corruption and Corporate Administrative Responsibility" aimed at Eni staff, in Italy and abroad, and the new online course on the Anti-Corruption Compliance Program for medium and high-risk personnel continued. In addition, during 2024 the Anti-Corruption and Anti-Money Laundering unit: (i) designed a competitive classroom seminar to make the workshop experience more interactive, (ii) held a general anti-corruption workshop aimed at Eni's M&A function which was also attended by some members of the Board of Directors and the Board of Statutory Auditors of Eni SpA; (iii) as part of agile training aimed at increasing the engagement

of participants, it has started the provision of a videogame on anti-corruption matters.

### *Anti-corruption initiatives for Eni's Value Chain*

The Anti-Corruption MSG is shared with third parties at risk, through the provision of specific contractual clauses and compliance declarations, which include, among other things, the commitment to read Eni's [Code of Ethics](#), [Model 231](#) and [Anti-corruption MSG](#), available on the Company website and to comply with its principles; in addition, related training and awareness-raising initiatives are promoted, depending on the circumstances. In the qualification process of potential suppliers, described below, their ethical-reputational profile is assessed and, for cases with a greater risk of corruption, their adoption of an Anti-Corruption Compliance Program. In any case, compliance clauses are defined in the relevant contracts which include, in addition to the above-mentioned commitments, also the provision of contractual remedies in the event of violations and, in cases of greater risk, audit rights by Eni. In addition, the subcontractor is also subject to preventive checks to verify its reliability from an ethical-reputational point of view and must operate exclusively on the basis of a written contract, which contains compliance commitments equivalent to those provided for the direct supplier. As part of the training initiatives for third parties, in 2024 Eni organized some sessions for specific types of Enilive counterparties (agents, LPG dealers and Italian lubricant dealers) and continued to provide an online course for high-risk suppliers.

### *The role of the Internal Audit department and related actions*

Eni's Internal Audit function plays a primary role in ensuring compliance with business conduct (including the management of whistleblowing reports received concerning alleged violations). More broadly, it is responsible for assessing and evaluating the Internal Control and Risk Management System (ICRMS), ensuring its overall effectiveness, adequacy, and operational soundness. In order to provide specialistic support to the top management and other managers of the company in relation to Eni Risk and Internal Control Holistic framework, the audits are outlined within an Audit Plan, defined according to criteria of materiality and coverage of the main risks and approved, at least annually, by the Board of Directors, subject to the opinion of the Control and Risk Committee, after consulting with the Chairman of the Board of Directors, the CEO and the Board of Statutory Auditors of Eni. In addition, the Head of the Internal Audit function activates other audits not part of the Audit Plan, based on requests from governing, control, and supervisory bodies, as well as from top management. In 2024 the anti-corruption checks, based on Anti-Corruption Compliance Program's provisions, have been performed in 26 Audits carried out in 12 Countries, moreover 13 supervisory activities were carried out

(179) In particular, high-risk resources are involved in ultra-specialized classroom training.



on the 231/Compliance Models of the Italian/foreign subsidiaries. As in 2023, in 2024 the number of ascertained corruption cases relating to Eni SpA amounted to 0 and, consequently, there were no dismissals related to these cases. For ongoing proceedings and for the total number of significant cases of non-compliance with laws and regulations (including any anti-competitive conduct and violations of antitrust laws and monopolistic practices), see the ► **Legal Proceedings** section. The appointment and termination of the Head of the Internal Audit function are subject to governance rules aimed at ensuring maximum independence. In fact, improving the recommendations provided for by the Corporate Governance Code, the manager is appointed by the Board of Directors, following the opinion of the Control and Risk Committee and the Nomination Committee and after consulting the Board of Statutory Auditors, on the proposal of the Chairman of the Board of Directors in agreement with the CEO; the Head of internal audit function reports directly to the Chairman, relating to the Board of Statutory Auditors, also as an "Audit Committee" pursuant to US legislation.

### *Reporting and verification process in case of violations of the Code of Ethics, anti-corruption rules and other regulations*

Since 2006, Eni has adopted internal regulations [Whistleblowing reports management received by Eni SpA and by its Subsidiaries](#), updated over time and most recently in March 2024, aligned with national and international best practices as well as EU Directive 2019/1937, which governs the process of receiving, analyzing and processing whistleblowing. The legislation, available on the Company website and intranet together with a brief operational guide, allows Eni's people, as well as all those who operate or have operated in Italy and abroad in the name of or on behalf of or in the interest of Eni, to report information on alleged violations acquired in the context of work. To be considered a whistleblowing report, the communication must be circumstantiated and be carried out with a sufficient degree of detail to the competent business functions to verify the validity or otherwise of the facts or circumstances reported. The activities following the receipt of a whistleblowing are guaranteed by a "Whistleblowing Team"<sup>(180)</sup> which operates in compliance with the principles of objectivity, competence and professional diligence, also ensuring feedback to the whistleblower; the Team, following a preliminary investigation, proceeds with carrying out in-depth investigations, analyses and specific assessments regarding the validity or otherwise of the reported facts and to formulate any recommendations on the adoption of the necessary corrective actions on the corporate areas and processes concerned by the whistleblowing report. The Whistleblowing Team, also by appointing one of the members and/or other Eni persons identified by them within the relevant unit, ensures the preparation

of the Quarterly Whistleblowing Report, which is examined by Eni's Board of Statutory Auditors. As a result of this examination, the Report is sent to the Supervisory Bodies (for Italian subsidiaries)/ International Supervisory Bodies (for foreign subsidiaries) and to the Board of Statutory Auditors of the companies concerned, if any, each for its own competence. Statistical information relating to cases handled in the last 5 years is also available on the Company website. The functions involved in the management process, including those relating to anti-corruption issues, ensure that the necessary conditions of independence and absence of conflict of interest are maintained, as well as the due objectivity, competence and professional diligence, as set out in international standards, as well as in Eni's [Code of Ethics](#) and on [Eni's website](#). In order to facilitate the receipt of whistleblowing reports, both in written and oral form, using IT tool suitable for guaranteeing the confidentiality of the identity of the whistleblower, as well as of the content of the whistleblowing report, including the identity of the reported person, a special platform is available, provided by an external provider, which Reporting Parties are invited to use preferably. The platform, duly publicised on Corporate websites and accessible at the link <https://whistleblowing.eni.com> guarantees, in order to ensure proximity to the whistleblower, the management of autonomous channels for Eni SpA and for EU subsidiaries with more than 249 employees or in other cases where this is necessary for the purpose of fulfilling the obligations of the local legislation implementing Directive (EU) 2019/1937. Regardless the subject of the whistleblowing and the Eni entity involved, everyone is always guaranteed the possibility to submit whistleblowing reports, which will be managed in compliance with and in application of Italian legislation, directly through the Eni SpA channel. In addition, alternative tools for collecting the whistleblowing report are also in place (e.g. dedicated mailboxes/boxes and voicemail, managed through dedicated functions of the platform) and set up by the individual subsidiaries where necessary in relation to the circumstances of the specific case (e.g., difficulty in accessing the internet, etc.).

The whistleblowing reports received during 2024 from its own personnel and that of the value chain demonstrates awareness of the dedicated tool. Eni's people who receive a whistleblowing report and/or who are involved, in any capacity, in the investigation and handling of the same, are required to guarantee the highest confidentiality about identity of the whistleblower, the persons involved and the persons mentioned, as well as the related content and documentation, in compliance with the "need to know" criterion, using, to this end, criteria and methods of communication suitable for protecting the identity, integrity and confidentiality of identification data (the so-called "principle of confidentiality"). The identity of the whistleblower and any other information from which that identity may be inferred, directly or indirectly, cannot be disclosed, without the whistleblower's

(180) A dedicated service endowed with the requirements of competence, independence and absence of conflict of interest, formed by the heads of units of the following functions of Eni SpA: integrated compliance, legal affairs, human resources and organization, internal audit and administration and financial reporting.



express consent, except in the cases provided for by law. Eni's people are prohibited from adopting direct or indirect acts of retaliation or discrimination against the whistleblower for reasons directly or indirectly related to the report. In particular, the whistleblower is protected from any act of retaliation or discrimination, direct or indirect, for reasons connected, directly or indirectly, to the report. No person within Eni may be fired, demoted, suspended, threatened, harassed, discriminated against, in any way, or, in any case, subject to retaliation for submitting a whistleblowing report. Any violation of the prohibition of retaliatory and discriminatory conduct may result in disciplinary proceedings being initiated against the individual who engaged in such conduct and the adoption of appropriate disciplinary/supportive measures for any parties involved. This is without prejudice to the right of the whistleblower to inform the local competent authorities, bodies or institutions of the retaliation they believe they have suffered, in accordance with locally applicable laws and regulations.

## ENI'S LOBBYING ACTIVITIES

As part of its partnerships and advocacy activities, Eni dialogues with policymakers both directly and indirectly through trade associations. In 2024, Eni's main engagement activities with national, international and European institutions focused on: (i) participation in economic promotion initiatives, meetings and round tables on issues related to business and new businesses, geopolitical and energy scenarios, sustainable development and new technologies; (ii) the representation of Eni's positioning on the energy transition and decarbonization at public events and major international multilateral forums (e.g. B7, B20, COP29); (iii) the engagement and dialogue with institutions, including in the context of partnerships and memberships, with think tanks, associations and international organizations regarding the definition of policies and standards pertinent to their business activities and in particular on energy and ecological transition, innovation and sustainable mobility; (iv) the presentation of projects, and the organization of visits by associations, institutional and political delegations to industrial facilities, operational sites and research centers. In particular, Eni participates in the definition of strategies and regulations aimed at accelerating the transition to Net Zero, supporting and sharing, in a clear and transparent manner, its positioning on climate change and related strategy issues. Eni recognizes the value of active participation in the work of business associations to develop and share best practices and develop advocacy positions aimed at promoting the energy transition and in this regard, in 2024, it published the third edition of the report assessing the alignment between Eni's positioning and that of the business associations in which the Company participates on issues related to climate advocacy. Eni is also proactively committed to directing the positions of each association, in particular associations whose positions diverge from the Eni Principles on Climate Advocacy,

towards an approach consistent with the need to act effectively to cope with climate change. Eni's principles on climate advocacy are:

1. Paris Agreement: Eni supports the objectives of the Agreement and the policies they pursue in conjunction with the goal of sustainability, energy security and protection of industrial competitiveness on the path towards Net Zero by 2050.
2. Role of gas: Eni recognises the role of natural gas in the energy transition and supports the implementation of specific regulations for the reduction of methane emissions and routine flaring.
3. Carbon pricing: Eni supports the implementation of credible and cost-efficient carbon pricing mechanisms.
4. Energy efficiency and low carbon technologies: Eni promotes actions and policies to support energy efficiency and technologies necessary for decarbonization such as renewables (both in the form of electrons and molecules in the liquid/gaseous state), CCS, Carbon Dioxide Removal, hydrogen.
5. Sustainable mobility: Eni supports the implementation of complementary solutions for the decarbonization of transport, such as sustainable biofuels and electric mobility, and policies based on a technology-neutral approach that promote the most mature and cost-efficient technologies.
6. Role of carbon credits: Eni supports the development of enabling policies for investments in Nature and Technology Based Solutions and the use of credits to offset hard-to-abate residual emissions.
7. Transparency and disclosure: Eni supports the development of best practices for transparent disclosure on climate actions and climate advocacy.

The activities and commitments relating to Eni's dialogue with institutional stakeholders, including lobbying, are under the responsibility of the Director of Public Affairs (reporting directly to the CEO), who participates in the meetings of the Management Committee and the Risk Committee, and regularly reports to the CEO on the issues of competence.

## Political contributions

Eni, as required by the Code of Ethics, does not use Company resources for electoral contributions and political advocacy activities or towards non-governmental organizations, except for internal costs relating to the activities of the Public Affairs Department, and any expenses towards third parties for intermediary activities with the institutions of the European Union. In addition, Eni does not make donations to political parties, but supports a series of scientific, cultural and social initiatives around the world: every request from these programs is subjected to rigorous due diligence to ensure that Eni's contribution is not misused and/or misinterpreted. In addition, Eni is registered in the EU Transparency Register<sup>181</sup> and adheres to the relevant code of conduct, which regulates its relationship with the institutions

of the European Union. Through the [Register](#), Eni provides extensive information on its activities, including the objectives of the organization, membership of trade and business associations and expenses related to the activities covered by the Register in the previous year. In Italy, Eni is listed in the registers established at the Ministry of Enterprise and Made in Italy (formerly the Ministry of Economic Development) and at the Chamber of Deputies. Expenses related to lobbying activities in Italy are reported in the transparency register of the Ministry for Enterprise and Made in Italy. The Chamber of Deputies publishes [Annual Reports](#) on the activities of registered companies. In the United States, all activities and expenses under the Lobbying Disclosure Act are reported on a quarterly basis and are [available to the public](#). In addition, any public position submitted to stakeholders and regulatory bodies of the USG (e.g. SEC, BOEM - Bureau Ocean Energy Management) shall be published on the relevant websites of such stakeholders and regulatory bodies.

## TAX STRATEGY AND TRANSPARENCY IN PAYMENTS

Eni's tax strategy, approved by the Board of Directors and available on the [Company's website](#), is based on the principles of transparency, honesty, fairness and good faith provided for in its Code of Ethics and in the "OECD Guidelines for Multinational Enterprises" and has as its primary objective the timely and correct payment of tax obligations in the various Countries where Eni operates being aware of contributing significantly to the tax revenues of the States, supporting local economic and social development. The Company's Tax Strategy provides for the payment of taxes in the Countries where operations take place according to local regulations and provisions and rejects aggressive tax policy choices, including locating legal entities in so-called tax havens. Eni has implemented the Tax Control Framework for which the CFO is responsible, structured in a three-phase business process: (i) tax risk assessment; (ii) identification and establishment of controls to protect risks; (iii) verification of the effectiveness of controls and related information flows (reporting). The control framework together with processes and procedures have been designed in such a way as to reduce the risk of violations with significant financial or reputational impact (tax risk) to a relatively low level. In 2024, Eni SpA and its subsidiaries were not involved in tax litigations for violations of the law or tax fraud that resulted in a final conviction. For more information on the status of the Group's tax litigation, please refer to the Notes of the consolidated financial statements, [Legal Proceedings](#) section; these disputes relate to the technical interpretation of local tax rules, which are often very complex, and are managed with a view to conciliation. As part of the tax risk management and litigation activities, Eni adopts prior dialogue with the tax authorities and the maintenance of relationships based on transparency, dialogue and collaboration, participating, where appropriate, in cooperation projects (co-operative compliance) such as the collaborative compliance regime

in Italy. As evidence of the commitment to better governance and transparency of the extractive sector, which is essential to promote a responsible use of resources and prevent corruption, Eni has been a member of the Extractive Industries Transparency Initiative (EITI) since 2005. In this context, in 2023 Eni was appointed Alternate Member of the Board of EITI, the main decision-making body of the initiative. The Board decides priorities for the organization and assesses Countries' progress in meeting the EITI standard. The EITI initiative provides for the compliance of precise expectations by the companies participating in the initiative which, starting from 2021, have also become a framework for evaluating these companies, to identify good practices and opportunities for improvement. In 2024, following the assessment carried out by EITI on compliance with the "Expectations for EITI supporting companies" (which showed that Eni fully meets 7 expectations and, partially, a further 2 out of a total of 9) Eni responded to EITI's follow-up request by communicating the adoption of measures to strengthen the current disclosure, in particular with respect to commodity trading, in order to be fully compliant with all "Expectations". Furthermore, at local level, Eni actively participates in the initiatives promoted by EITI in 7 Countries, both directly through the Multi Stakeholder Groups established in the EITI member Countries, and indirectly through trade associations. In accordance with Italian Law no. 208/2015, Eni draws up the "Country-by-Country Report" ("CbCR") envisaged by Action 13 of the "Base erosion and profit shifting - BEPS" project, promoted by the OECD with the sponsorship of the G-20, whose objective is transparency on the profits of multinational companies for the benefit of tax administrations and on the correlation between the tax base declared in each jurisdiction and the soundness of the underlying economic activity, providing information on the proportionality between taxes and locally generated value. With a view to promoting greater transparency in tax matters for the benefit of a wider range of stakeholders, this report is subject to voluntary publication by Eni; in 2024, EU Directive no. 2021/2101 was implemented in Italy, which provides for the mandatory publication of certain elements of the CbCR starting from the 2025 tax period. The publication of this report has been recognized as a best practice by the EITI itself. Also, in line with its support for EITI, Eni has published a position on contractual transparency in which it encourages governments to comply with the new standard on the publication of contracts and expresses its support for the mechanisms and initiatives that will be launched by Countries to promote transparency in this area.

## CYBER SECURITY

The cyber security topic is material due to the fact that the Group's operations depend significantly on IT systems, including those of third parties, which pervasively support all business processes. These systems are exposed to the risk of malfunctions, viruses, unauthorized access, theft of sensitive information that can cause operational, economic and reputational damage (for more information, see the section [Risk factors and uncertainties](#)).



## SUSTAINABLE SUPPLY CHAIN MANAGEMENT

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IROS)

Eni's procurement strategy is based on sharing values, commitments and objectives with the supply chain, adopting a systemic and inclusive approach. This approach aims to involve all levels of the supply chain in a path of continuous improvement and sustainable development, promoting principles of environmental and social sustainability to raise awareness and foster more responsible business practices. The positive impact deriving from this strategy is reflected on the entire supply chain, improving its competitiveness, and on Eni's own activities. In an increasingly sustainability-oriented industrial context, Eni strengthens its leadership role through the Open-es initiative, a digital platform and system alliance, with the aim of building a more resilient supply chain and supporting a business ecosystem in line with the sustainable transition goals, which represent a central pillar of Eni's strategy.

### ACTIONS TAKEN ON MATERIAL IROS

Eni's sustainable supply chain management strategy is based on the sharing of values, commitments and objectives with its supply chain and is based on three pillars: a systemic and inclusive approach, the development and enhancement of best practices and sustainability pervasiveness in the procurement process. The first aims to involve every level of the supply chain in a path of improvement and sustainable development, sharing common objectives and adopting a diversified model according to the ESG maturity of companies. To involve the entire value chain, Eni also promotes multi-stakeholder initiatives such as [Open-es](#), launched by Eni with Boston Consulting Group and Google Cloud in 2021, in order to create a common initiative between the industrial, financial and associative worlds to support companies in the path of measurement and growth on ESG dimensions for the benefit of the entire business system. To date, more than 30 partners have joined it, including large industrial companies, financial institutions and associations, and more than 28,000 companies have registered (increase of more than 85% compared to 2023), of which about 7,000 belong to the Eni Italian and foreign supply chain. The development and enhancement of best practices consist of supporting suppliers in fulfilling the various ESG requirements, providing tools to support their sustainable development path and more generally competitiveness. These initiatives consist, first and foremost, in providing companies with tools for: (i) measuring and improving the degree of ESG maturity through a path based

on standard metrics aligned with the regulatory context and with comparison with industry benchmarks, accessing customized development plans and solutions offered by companies specialized in the ESG field; free sustainability events and training programs are periodically carried out; (ii) financial support through the "Sustainable Supply Chain Finance" initiative, launched in 2023, which allows its suppliers to request early payment of invoices without impacting credit lines, to incentivize the improvement of the Company's ESG profile thanks to the synergy with the Open-es platform. In 2024, advances of invoices were granted for a total amount of about 90 million euros. Eni also offers its suppliers products and services at favorable conditions, such as solutions for energy efficiency and the use of HVOlution biofuel in transport; (iii) enhancement of excellence, through the HSE & Sustainability Supply Chain Award, in order to share best practices in ESG and reward the most distinctive and innovative companies. In addition, in 2024, Eni continued the "Inclusion Development Partnership" launched in 2023, to create a more inclusive and diverse supplier base and increase participation in the purchasing processes of companies owned by individuals from underrepresented groups. ESG pervasiveness in the procurement process is represented by the integration of the principles of environmental protection, social growth and economic development at every stage. With this approach, Eni has adopted the "Sustainable Supply Chain Framework", a governance mechanism that combines corporate objectives, legislative requirements, targets and specific action plans that affect the procurement process and more generally the supply chain. This framework consists in a transversal oversight of the various dimensions of sustainability and with a focus on priority ESG issues periodically identified on the basis of the Company's strategic plan and the evolution of The Regulatory Framework. In particular, the transversal oversight includes: (i) the signing by suppliers of the [Supplier Code of Conduct](#) as a mutual commitment to recognize Eni's values; all new suppliers are also assessed according to social criteria<sup>182</sup>; (ii) recurring qualification updates and due diligence in order to minimize risks along the supply chain through the verification of the ESG positioning of suppliers and of their ethical-reputational, economic-financial, technical-operational reliability and the application of health, safety, environment, governance, cyber security and human rights safeguards; (iii) logic for awarding contracts also on the basis of the ESG characteristics relevant to the contractual object; (iv) periodic monitoring of compliance with commitments undertaken and supplier behaviour through the management of performance feedback; (v) sharing of improvement actions with the supplier, if critical issues emerge at any stage of the relationship, and limitation/

(182) Assessment carried out on the basis of information available from open sources and/or declared by the supplier and/or performance indicators and/or on-site audits, through at least one of the following processes: reputational due diligence, qualification process, performance evaluation feedback on HSE or compliance areas, feedback process, assessment on human rights issues (inspired by the SA8000 standard or similar).



inhibition of participation in tenders, if the supplier does not meet the minimum standards of acceptability envisaged. In addition to the transversal oversight, also in 2024 in relation to some priority ESG dimensions for Eni (such as climate change, supply chain governance, human rights, dignity and equality, cyber security and safety) dedicated checks and in-depth studies continued to be carried out and specific minimum criteria were used for the evaluation of offers, as well as dedicated standard clauses in contracts. Particular attention was paid to the topics that turned out to be materials in the value chain: (i) climate change; for the most emitting suppliers, an engagement activity was launched to ensure that they declared their Scope 1 and 2 emissions and to support them and, more generally, the entire supply chain, a free and easy-to-use tool developed with Accenture, dedicated to the quantification of emissions at company level, was made available on the Openes platform; (ii) human rights of workers (see [Workers in Eni's value chain](#)); (iii) responsible management of the supply chain, an assessment was conducted on suppliers characterized by complex supply chains with frequent recourse to subcontracting, to analyze the level of control of their supply chain, with the aim of making the main players in Eni's supply chain responsible for implementing ESG due diligence in their supply chains. In cases where significant

deficiencies have emerged, improvement plans have been defined and shared, and for particularly critical situations, participation in Eni tenders for non-compliant companies have been limited. For the implementation of Eni's Sustainable Supply Chain strategy, specific management expenses (non-material) related to the functions and personnel involved are defined, as well as costs for on-site audits carried out by third parties, are provided. Eni aims to further strengthen the sustainable management of the supply chain, at all levels, by providing tools that allow suppliers to adopt and replicate the Eni model, while maintaining a systemic and inclusive approach. The intention is to promote greater accountability of direct business partners, especially the large players in the market, encouraging them to carry out regular due diligence activities on their third parties and to actively monitor environmental and social sustainability issues along the entire supply chain. At the same time, Eni is committed to intensify internal audits of subcontractors and all the entities with which it has business relationships, with particular attention to critical or high-risk contexts, adopting a more rigorous approach. This path is aimed at improving the ability to identify, prevent and mitigate risks, strengthening transparency and shared responsibility along the supply chain, in the short and medium-term.

## KEY PERFORMANCE INDICATORS<sup>(a)</sup>

|  | Units of measurement | 2024  |
|--|----------------------|-------|
| N° suppliers involved in awareness, measurement and collaboration initiatives on ESG topics                                      | (number)             | 7,512 |
| % of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics              | (%)                  | 70    |
| % of the value of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics |                      | 82    |

(a) The data are only available for 2024, as new indicators monitored from this year.

## SUPPLIER PAYMENT PRACTICES

In general, Eni manages supplier payments according to uniform criteria and standardised procedures, without distinction of type, size or geographical location. Eni<sup>183</sup> provides, in its standards<sup>184</sup>, a payment term to suppliers equal to 60 days in contracts entered into under the private regime and 30 days for those falling within the scope of the Public Contracts Code (Italian Legislative Decree

36/2023)<sup>185</sup>. For the average payment times of Eni S.p.A.'s suppliers and its Italian subsidiaries in 2024, see [Management Report/Other Information](#). For the reporting period, there are no pending legal proceedings in Italy against Eni SpA and its Italian subsidiaries concerning late payments to their suppliers. For more information, see [Reporting Principles and Criteria](#).

(183) In line with the approach based on transparency and fairness in the management of its suppliers, Eni SpA has adhered to the Italian Code for Responsible Payments that Assolombarda established in 2014.

(184) Also valid for subsidiaries for which Eni SpA carries out procurement activities in a centralized manner.

(185) The individual contracts of Eni SpA and its subsidiaries adopt this term, with exceptions deriving from any regulatory provisions applicable to the contract or from specific business needs.



# Reporting principles and criteria

## INTRODUCTION

Sustainability reporting is prepared on a consolidated group basis, approved by the Board of Directors and subject to limited audit. The [Content Index](#) details any following: (i) disclosures of qualitative and quantitative information deriving from other legislation; (ii) entity-specific indicators, as indicated by the ESRS principles, which are inspired by the GRI Oil & Gas Sector standard and/or the draft EFRAG O&G sector standard or indicators linked to strategic objectives; (iii) disclosure of information contained in the Management report; (iv) the use of any phase-ins. As regards the Minimum Disclosure Requirements (MDR), those relating to policies are dealt with in the [Policies: Code of Ethics and Regulatory System](#); those relating to actions and targets are explored in depth within the specific chapters, while those relating to metrics within the [Metrics: methodologies](#) section. It should be noted that within the thematic chapters, reference is made to the word “target” if the ESRS criteria are met, otherwise it refers to Entity-Specific commitments.

## Reporting boundary

Sustainability reporting has been prepared in accordance with the European Sustainability Reporting Standards and the EFRAG IG 2 “value chain” Implementation Guidance, which requires a reporting boundary aligned with the financial one<sup>186</sup> and, where required, this is appropriately extended to the entities under its operational control<sup>187</sup>, as defined by Annex II of the CSRD delegated act and the EFRAG Implementation Guidance mentioned above. In particular, for the GHG emissions indicators, the reporting boundary includes, in addition to subsidiaries, also assets which are reflected in the financial reporting, although not controlled by Eni, and in particular: (i) joint operations, both contractual and incorporated, whose assets are proportionally consolidated in Eni consolidated financial statements; (ii) assets recognised against any cash calls from companies that carry out the role of sole operator of oil contracts (so-called operating companies); (iii) as well as the assets recognised because of leasing contracts. For these non-controlled entities, if not under operational control, emissions are recognised limited to the share held; on the contrary, if the entity is operated, the emission component referring to the interest held by third parties (not consolidated) is also reported<sup>188</sup>. Other associates, joint ventures and

relevant entities over which Eni SpA does not exercise operational control are not included in the reporting boundaries, except for some specific KPIs that require value chain information (such as Scope 3 emissions). In order to ensure comparability with the sector and to show the progress towards strategic targets, the operational control boundary and the equity boundary are also added to this view (see the paragraph [Metrics: methodologies](#)). With regard to environmental information, in order to ensure the comparability and quality of the information required by the ESRS, for all topics E2, E3, E4 and E5, the quantitative data are presented on the basis of the operational control boundary<sup>189</sup> and the share of environmental information related to non-controlled entities operated by third parties is separately disclosed (e.g. joint operation, both contractual and corporate). Regarding social standards, the boundary of own workforce refers to Eni subsidiaries, net of health and safety indicators that are reported according to the operational control boundary in line with the best practices. As regards the indicators relating to communities, data are related to those in which Eni has operational control as well as to some joint ventures in which Eni plays a significant role in the management of local stakeholders. For further information on the individual KPIs, please see [Metrics: methodologies](#). In the case of business combinations that took place during the reporting year, the information was reported only in relation to the actual months of accrual and in the event of the sale/disposal of companies during the year, the information is reported until the sale/disposal date. In light of regulatory changes, reporting standards and new reporting boundaries, the comparative data have been restated, as far as reasonably feasible.

## Basis for preparation

The **quantitative information** is identified after the materiality assessment, is collected on an annual basis and refers to 2024 and, where already collected and published last year, the 2023 data has also been reported. In general, trends related to performance indicators are calculated using also decimal numbers not reported in this document. The figures for the year 2024 constitute the best possible valuation with the data available at the time of preparation of this report. When estimates are used, or different time horizons from those of the ESRS, these are deepened in the [Metrics: methodologies](#). The 2023 data

(186) For Eni's shareholdings, please refer to the section [Annex to the notes on consolidated financial statements as of December 31, 2024](#) of the Annexes to the notes to the Consolidated Financial Statements of Eni SpA. In addition, references to corporate classifications (such as subsidiaries, consolidated line-by-line companies, joint operations, etc.) refer to the IFRS and IAS definitions as described in the paragraph [“Significant accounting policies, estimates and judgments”](#) of the Notes of the Consolidated Financial Statement.

(187) Among the most relevant criteria for identifying operational control are the existence of a contractual document, which recognizes Eni as the operator, the full authority to direct operational activities and the full authority to introduce and implement operating policies, as well as to manage the company's/site/asset relationships.

(188) Similarly, the emissions of jointly controlled companies (joint ventures) and associates are also reported at 100% when there is operational control.

(189) Data from non-operated entities have been collected from third-party operators of the specific assets using proper information flows.



relating to environmental aspects (including emissions based on an operated boundary) have been restated to align with the new criterion applied. Most quantitative information is automatically collected and aggregated through an enterprise software and sent to a dedicated platform for data tracking and approval. With regard to the reporting period, no information on intellectual property, know-how or classified as sensitive are omitted, except for the reference value of the target relating to the Net Promoter Score. Furthermore, there are no errors (and related corrections) to report compared to the previous edition of the report. Where relevant, some information also relates to the upstream and downstream **value chain**. This includes a materiality assessment of impacts, risks and opportunities (IROs) along the value chain (■ **Materiality assessment, management of impacts, risks and opportunities**). Any IRO with an effect on the value chain is indicated both in the materiality section and in the disclosure of the specific topic. When policies, targets, actions, or metrics also refer to value chain actors, this is indicated in the reference section.

## POLICIES: CODE OF ETHICS AND REGULATORY SYSTEM

The [Code of Ethics](#), updated in 2020, expresses the corporate values that characterise the commitment of Eni's people and all third parties working with the company: integrity, respect and protection of human rights, transparency, promotion of development, operational excellence, innovation, team work and collaboration. These values support the company in defining the appropriate administration and control structure, in adopting an effective internal control and risk management system and in communicating with shareholders and other stakeholders. Together with these values, the Code of Ethics contains general principles and concrete rules of conduct, which provide a guidance in business operations, addressing members of the corporate Bodies of Administration and Control and employees of Eni and its subsidiaries, and all third parties, such as suppliers, commercial and industrial partners (the document has been developed taking into account also their perspectives). The document also underlines Eni's commitment to respect Human Rights in its activities and those of its business partners, in line with the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational

Enterprises as well as in compliance with the Voluntary Principles on Security and Human Rights. Other references considered are the SDGs and the Paris Pledge; for a widespread understanding, the Code is disseminated and promoted through various actions, including specific training and translation into the languages of the Countries in which Eni operates. The updated version of the document is available on the websites and intranets of Eni SpA and its subsidiaries. The Code of Ethics was drawn up with the involvement of management and was approved by the Board of Directors of Eni SpA, as proposed by the CEO in agreement with the Chairman, after having heard the opinion of the Board of Statutory Auditors and the Control and Risk Committee. The Code of Ethics is a reference for ■ **The Regulatory System**, the various elements of which are referred to in the Policies section of the thematic chapters. In particular, three basic types of documents are cited whose characteristics<sup>190</sup> are:

- i. **ECG (Ethics Compliance and Governance) Policy:** these are public documents (with the exception of the Policy ECG Privacy and Data Protection), applicable to Eni SpA and its subsidiaries; and whose "Fundamental Guidelines" are approved by the Board of Directors of Eni SpA while the "Application Methods" are approved by the Process Owner<sup>191</sup>, who is responsible for the design and its adequacy over time, while the management and all Eni's people are required to apply the regulations and implement initiatives to prevent and detect irregularities and/or fraudulent acts. In addition, the Assurance Providers (i.e. the 2<sup>nd</sup> and 3<sup>rd</sup> level of control corporate functions as identified by the ENRICH - Eni Risk and Internal Control Holistic framework - such as, for example, Integrated Compliance, Internal Audit, Integrated Risk Management, etc.) support the Process Owner both in the identification and assessment of the main risks, and in the definition and implementation of adequate management systems for these and they monitor, on a competence basis, the adequacy and operativeness of the controls put in place to monitor the main risks.
- ii. **Public positioning:** these are public corporate positions on specific issues, proposed by the relevant Process Owners, with the approval of the CEO or Board of Directors.
- iii. **Management System guidelines:** these are documents that are part of the Regulatory System (of which the MSG "Anti-Corruption"

(190) In the case of engagement of external stakeholders, these are made explicit, where relevant.

(191) The Process Owner is responsible for the design and relative adequacy over time of the regulatory instruments under his or her responsibility. The ECG Process Owner approves the application modalities of the ECG Policies and related Global Procedures, Company Procedures of Eni SpA and Professional Operating Instructions; the Process Owner approves the process MSGs and related Global Procedures, Eni SpA Company Procedures and Professional Operating Instructions. The Process Owner evaluates the waiver requests made by the subsidiaries. Where the role of Process Owner is assigned to more than one person, competent for processes/issues Ethics, Compliance & Governance, a Process Owner Committee is established. The table below refers to Process Owners as responsible for the functions mentioned.



and the Annex "whistleblowing reports management received by Eni SpA and by its Subsidiaries" are public), applicable to Eni SpA and its subsidiaries, whose approval is the responsibility of the Process Owner<sup>192</sup>, and drawn up through the engagement

of all internal stakeholders, in accordance with the aspects of competence.

The references of the regulatory documents and placements cited in the Sustainability Statement are shown below:

## POLICY AND INTERNAL REGULATORY FRAMEWORK

|  |   |
|--|---|
| <b>ECG Policy Respect for Human Rights in Eni (S1, S2, S3, S4, G1)</b>                 | References: United Nations Guiding Principles on Business and Human Rights, International Labour Organization Guidelines, Universal Declaration of Human Rights, United Nations (UN) and OECD Guidelines; principles of the UN Global Compact and the International Finance Corporation (IFC) Performance Principles on Environmental and Social Sustainability, ILO Indigenous and Tribal Peoples Convention and UN Declaration on the Rights of Indigenous Peoples; Voluntary Principles on Security and Human Rights and Basic Principles on the Use of Force and Firearms by Law Enforcement Officials of the UN. |
| <b>Policy ECG Privacy and data protection (S4)</b>                                     | References: Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data; Legislative Decree 196/2003 "Privacy Code"; Guidelines 07/2020 on the concepts of controller and processor in the GDPR.   |
| <b>Policy ECG Consumer Protection &amp; Green Claims (S4)</b>                          | References: Directive 2005/29/EC concerning unfair commercial practices; Directive 2006/114/EC concerning misleading and comparative advertising; Directive (EU) 2019/2161 for better enforcement and modernisation of EU consumer protection rules; European Commission's proposal for a Directive of 22 March 2023, so-called "Substantiating Green Claims".  |
| <b>Policy ECG Diversity &amp; Inclusion (S1)</b>                                       | References: UN Convention on the Rights of People with Disabilities, art. 27, 2006; UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) of 1979; Charter of Fundamental Rights of the European Union; Women's Empowerment Principles (and GenderBased Violence and Harassment at Work Policy Template); Reference Practice UNI/PdR 125/2022.  |
| <b>Policy ECG Zero Tolerance against violence and harassment in the workplace (S1)</b> | References: International Labour Organization Convention no. 190 on the Elimination of Violence and Harassment in the Workplace, adopted in Geneva on June 21, 2019 during the 108th session of the General Conference of the same Organization; Recommendation No. 206 on the Elimination of Violence and Harassment in the Workplace; Law No. 4 of 15 January 2021 ratifying and implementing the International Labour Organization Convention No. 190 on the Elimination of Violence and Harassment in the Workplace.  |

## PUBLIC POSITIONS

|   |  |
|---|--|
| <b>Eni's positioning on the water (E3)</b>  | Applicable to all companies operated by Eni, approved by the CEO and responsibility of the HSEQ Process Owner for operational management. References: Water Mandate, an initiative of the UN Secretariat, which Eni joined in 2019.  |
| <b>Eni's positioning on Biodiversity and ecosystem services (E4)</b>                    | Applicable to all Eni operating sites and provided to contractors and where, applicable, to suppliers (upstream value chain) in all Countries and throughout the projects lifecycle; Stakeholders consulted at corporate level and at site level for the drafting of the policy. References: Convention on Biological Diversity. Approved by the CEO and responsibility of the biodiversity Process Owner for general supervision and of the HSEQ Process Owner for operational management.  |
| <b>Eni's No-Go Commitment (E4)</b>  | Applicable to the Oil and gas exploration and development activities. Approved by the CEO. References: UNESCO World Heritage List.   |
| <b>Eni's position on biomass (E4)</b>   | Applicable to Eni SpA and its subsidiaries approved by a technical table. Eni is committed to collaborate with stakeholders and experts to improve its knowledge and ensure the implementation of the most advanced standards (with respect to the biomass used) within the company. References: 2030 targets of the Recast of the RED Directive (Directive 2018/2001).  |
| <b>Eni's responsible engagement on climate change within business associations (G1)</b> | Applicable to Eni SpA and its subsidiaries. Approved by Top Management.  |
| <b>Eni's position on conflict minerals (S2)</b>   | Applicable to Eni SpA and subsidiaries Responsibility of the Head of accounting and financial statements. References: Regulations of the Securities and Exchange Commission (SEC) of the United States.  |
| <b>Supplier Code of Conduct (S2, G1)</b>  | Applicable to Eni SpA and its subsidiaries. The responsibility for application is external to Eni, which supervises suppliers and carries out actions on those suppliers who demonstrate conduct that differs from that provided for by the supplier code of conduct. References: United Nations Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises and the Voluntary Principles on Security & Human Rights; a cluster of suppliers was involved for the drafting of the document. |

## MANAGEMENT SYSTEM GUIDELINE (MSG) AND ANNEXES

|   |  |
|---|--|
| <b>HSE and Annexes (E1, E2, E3, E4, E5, S1)</b>   | Applicable to Eni SpA and its subsidiaries. HSEQ Process Owner. References: CEO Water Mandate (public-private initiative launched by the UN in 2007); Aqueduct; ISO 14001:2015 standard; ISO 45001:2018; Directive 2008/98/EC; Legislative Decree 152/2006; Directive 2008/50/EC; Directive 2010/75/EC; UNI EN 13725 standard; 50001:2011.   |
| <b>Human Resources (S1)</b>   | Applicable to Eni SpA and its subsidiaries. HR Process Owner. References: International Labour Organization - ILO Tripartite Declaration; Privacy and Data Protection legislation  |
| <b>Commercial (S4)</b>  | Applicable to Eni SpA and its subsidiaries. Process Owner. Gas Portfolio, Enilive Sales and Marketing, Versalis Business Unit, Retail Italian Market Plenitude.  |
| <b>Anti-Corruption (G1)</b>   | Applicable to Eni SpA and its subsidiaries. Process Owner Integrated Compliance. References: Italian anti-corruption law and anti-money laundering laws in force in the Countries of activity (including the United Nations Convention against Corruption, the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the US Foreign Corrupt Practices Act, the UK Bribery Act and Legislative Decree of June 8, 2001, no. 231) and the best guidances and best practices on anti-corruption management systems. |
| <b>Whistleblowing reports management received by Eni SpA and by its Subsidiaries (G1)</b> | Applicable to Eni SpA and its subsidiaries. Process Owner Internal Audit. References: Directive (EU) 2019/19371 and its transposing laws, Sarbanes - Oxley Act of 2002.  |
| <b>MSG Health (S1)</b>  | Applicable to Eni SpA and its subsidiaries. Process Owner HealthReferences: ISO 14001:2015 standard  |
| <b>MSG Procurement (S2, G1)</b>   | Applicable to Eni SpA and its subsidiaries. Process Owner Procurement. References: Anti-corruption and anti-money laundering laws in force in the Countries of activity; Applicable national and international regulations and instruments, guidelines and best practices that aim to prevent violations in the field of Human Rights (e.g. UNGPs, the OECD Guidelines and the ILO Declaration on Fundamental Principles and Rights at Work).  |
| <b>Responsible and Sustainable enterprise (S3)</b>  | Applicable to Eni SpA and its subsidiaries. Process Owner Sustainability. References: International Bill of Human Rights; Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO); specific Conventions particularly inherent to Eni's activities, such as: Core Human Rights Treaties, or the subsequent international Treaties and related Protocols, as defined by the UN High Commissioner for Human Rights; OECD Guidelines for Multinational Enterprises; IFC Performance Standard 1, 2, 5 and 7; ISO 26000 - Guide to Social Responsibility.                  |

(192) With the exception of the "Anti-Corruption" MSG which is approved by the Board of Directors of Eni SpA and the Annex "whistleblowing reports management received by Eni SpA and by its Subsidiaries" approved by the Board of Statutory Auditors of Eni SpA as Audit Committee pursuant to SOA regulations.



## METRICS: METHODOLOGIES

### ENERGY AND CLIMATE BOUNDARY

For the reporting of GHG emissions, the following reference boundaries are considered:

- boundary that includes Eni SpA, its subsidiaries, the significant leasing contracts, the share held in joint operations (incorporated and unincorporated), Operating companies (which have an accounting treatment similar to joint operations).
- an operated boundary, in line with industry practices, that includes Eni SpA, its subsidiaries, significant leasing contracts and considers 100% of the data from operated joint operations (incorporated and unincorporated) and 100% of the data from operated joint ventures and Associates.
- an "entity specific" equity boundary, which includes Eni SpA and all subsidiaries, joint arrangements and associates (operated and non-operated) accounted for its equity share. This boundary is used for the metrics underlying Eni's medium/long-term decarbonization targets.

Concerning energy data, the following are considered:

- an operational control boundary, which includes Eni SpA, its subsidiaries, the relevant leasing contracts, 100% of the data from operated joint operations (incorporated and unincorporated) and 100% of the data from operated joint ventures and associates;
- an integration related to Eni share in non-operated joint operations and its share in operating companies.

In addition, there are some entity-specific indicators, connected to the strategy's targets, for which a boundary calculated in equity share of the upstream production is applied, in line with international and industry standards (GHG Protocol and IPIECA); joint ventures and associates are also included, according to equity share, in these indicators.

This boundary does not apply to the KPI of renewable installed capacity, calculated on an equity basis and which mainly refers to Plenitude.

As regards the data relating to carbon credits, the boundary is represented by the credits purchased by Eni SpA and its subsidiaries.

As regards the "patents and innovation" section, the data are reported considering Eni SpA and its subsidiaries consolidated on a line-by-line basis.

| DATAPOINT | METHODOLOGY |
|-----------|-------------|
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### CLIMATE CHANGE

#### Emissions & Data Collection Process

**OPERATING BOUNDARIES AND ACCOUNTING METHODS:** in line with regulatory references and with the main international standards (WBCSD/WRI GHG Protocol Initiative Standard and industry best practices), GHG emissions are reported for all relevant emission sources, considering the following gases: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O [Other greenhouse gases (HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>), based on the analysis conducted on the available data, are not considered significant (in line with the O&G sector), as they weigh about 0.1% of the total GHG]. The conversion of emissions to CO<sub>2</sub>eq is carried out through the application of GWP – 100 years, reported in the 6th Assessment Report of the IPCC (AR6 – 29.8 for CH<sub>4</sub>, 273 for N<sub>2</sub>O). Emissions are classified into direct (Scope 1), indirect Scope 2 (according to the location-based and market-based approach) and indirect Scope 3.

**Data collection and reporting process, Quality Assurance/Quality Check and Internal Control System:** Eni has implemented a process for collecting, accounting and reporting GHG emissions based on the following elements:

- Specific procedures are applied for the collection of data in line with the Company's organisational structure, clearly identifying roles, responsibilities and reporting timing. Data is collected on a monthly/quarterly basis according to a bottom-up approach: GHG operators of sites and facilities within operational boundaries enter the data into Eni's centralized information system. Subsequently, this data is validated by the business lines and consolidated centrally, through Eni's internal rules and procedures aimed at ensuring the accuracy and consistency of emissions data.
- Internal technical procedures have been implemented for the identification of material sources of GHG emissions and for the identification of common methodologies for the calculation of GHG emissions at the bottom-up level. The measurement, calculation and estimation methodologies are largely inspired by the WBCSD GHG PROTOCOL, IPIECA O&G Guidance and API Compendium. With regard to the level of uncertainty associated with activity data (consumption) and emission factors, appropriate measures are implemented, where possible, to minimise them, such as: (i) the application of regulated standards and the use of accredited laboratories for the analysis of the characteristics of fuels in order to determine the emission factors; (ii) the use of measuring instrumentation, calibrated and assessed periodically in accordance with international standards, for the accounting of energy consumption (activity data).
- Centralized tools have been implemented to ensure a correct calculation of greenhouse gas emissions at the bottom-up level. The information tools are managed centrally in line with Eni's ICT procedures and are subject to periodic verification by third parties in order to ensure homogeneity in the calculation of emissions among all the companies included in the scope of consolidation (minimizing the risk of error), and proper management of users that have access to the systems, in line with the ICT procedures implemented by Eni.
- Additional QA/QC tools are also adopted to ensure the completeness and accuracy of the data. In particular: (i) the scope of consolidation is subject to periodic review in order to verify the inclusion/exclusion criteria; (ii) periodic checks are carried out on the significant deviations of the data compared to the previous reporting period and the causes are formalized; (iii) checks are conducted relating to the interface between the various applications in which the data that contribute to the generation of the GHG emission data are managed; (iv) periodic internal audits are planned at various levels, which also cover data on GHG emissions.

The actions to support the verification of data quality are formalized as part of the internal control system which, in line with what has already been implemented for the financial information, is also extended to non-financial information. Finally, the robustness of accounting is guaranteed by the third-party certification processes on emission data.

Mt CO<sub>2</sub>eq. = mm tonnes CO<sub>2</sub>eq. = million tonnes of CO<sub>2</sub> equivalent

kt CH<sub>4</sub> = k tonnes CH<sub>4</sub> = thousand tonnes of CO<sub>4</sub>



| DATAPOINT                                      | METHODOLOGY  |
|--|--|
| <b>Direct Scope 1 emissions</b>                | <p>Scope 1 GHG emissions come from sources owned or controlled by the Eni Group, including: emissions associated with the generation of electricity necessary for operations (including those related to the export of electricity to Eni sites outside the reporting boundary), gas treatment and compression, and processing of petroleum products. Scope 1 GHG emissions are classified into the following categories: (i) <b>Combustion and process</b>: GHG emissions from stationary combustion, mobile sources, and industrial process operations; (ii) <b>Flaring</b>: GHG emissions from the controlled combustion of hydrocarbons in flaring. This type of source includes emissions deriving from routine flaring, non-routine flaring and emergency flaring (safety flaring); (iii) <b>Venting</b>: GHG emissions from venting in Oil and Gas exploration and production operations, electricity generation and gas transportation (e.g.: amount of CO<sub>2</sub> and CH<sub>4</sub> contained within unburned gases discharged through vent openings and reservoir CO<sub>2</sub> associated with hydrocarbon extraction); (iv) <b>Fugitive</b> (CH<sub>4</sub>): Unintentional leaks in plants, equipment such as pumps, valves, compressor seals, etc. The calculation of emissions derives from the measurement/estimation of activity data (e.g.: fuel consumed, electricity, distance traveled). Based on their physical origin, the data are taken from: (i) fuel meter records; (ii) utility bills, e.g. for electricity consumption; (iii) direct measurement (such as LDARs for fugitive emissions); (iv) other methods used in some Eni sites and facilities. The emission factors used are calculated considering the chemical composition of the gas or are derived from literature sources. In particular, (i) for installations falling within the scope of the Emissions Trading scheme, reference is made to EU-ETS Regulation 2018/2066: table of national standard parameters for the year 2024, revised and published by the Ministry for Ecological Transition, applied to: natural gas, LPG, refinery fuel gas, petroleum-derived gas, gas flare; (ii) for all other installations, the main literature references are the IPCC guidelines and the API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry 2009/2021 for CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O. At Eni sites and facilities where an LDAR (Leak Detection and Repair Program) is in place, fugitive CH<sub>4</sub> emissions are estimated, reported and monitored through periodic measurements. Emission factors are mainly derived from API or EPA standards (e.g. EPA Protocol No. 453) and emissions are expressed in tCO<sub>2</sub>eq./year. In sites where the LDAR program is not yet in place, fugitive emissions are estimated from the census of components (valves, flanges, etc.), or from the production of oil and gas, through standard emission factors (API Compendium). Biogenic Scope 1 CO<sub>2</sub> emissions are reported separately; they amount to 0.22 and 0.27 MtCO<sub>2</sub>eq. in 2023 and 2024 respectively and refer to biomass combustion and biomethane production processes in Eni installations. The percentage of Scope 1 emissions covered by ETS schemes is calculated by considering Eni installations falling under the EU/UK ETS and emissions from Eni installations in Kazakhstan and Australia (Countries where an ETS scheme is in force).</p> |
| <b>Volumes of hydrocarbons sent to flaring</b> | <p>The indicator measures the volume of hydrocarbons sent to flare (flaring). In particular, a distinction is made between volumes of total hydrocarbons sent to flaring and volumes sent to routine flaring in the Upstream sector, which includes routine activities on wells, in gas/oil treatment plants, in compressor stations in case of excess of gas.</p>   |
| <b>Scope 2 indirect emissions</b>              | <p>This category includes GHG emissions from the generation of electricity, steam, heating and cooling, purchased from third parties and consumed by Eni. Emissions are reported according to the following approaches:</p> <ul style="list-style-type: none"> <li>• Location Based – an approach based on the average energy mix of the Country from which third-party electricity is purchased; the reference source for Scope 2 emission factors from electricity purchases is the Emission Factors database, periodically published by the IEA, which reports Country-specific factors;</li> <li>• Market Based – an approach based on specific data relating to the supply of electricity taking into account the share of renewable electricity, the residual mix of the Country and contractual instruments in their own right or in combination with supply contracts. Emissions associated with supplies from non-renewable sources, or not covered by guarantees of renewable origin, are calculated by applying, where available, emission coefficients relating to the specific supply, the residual mix or, in the absence of such information, the energy mix of the reference Country. The main reference source for residual mix emission factors is the AIB 2023 (Association of Issuing Bodies – European Residual Mixes) publication.</li> </ul> <p>The emission factors used to calculate indirect emissions from steam purchases are derived from the API Compendium. Scope 2 biogenic CO<sub>2</sub> emissions are not estimated as they are considered not significant.</p>   |
| <b>Indirect Scope 3 emissions</b>              | <p>This category includes GHG emissions related to Eni's value chain, which are not accounted for as Scope 1 or Scope 2 emissions. Based on the WBCSD/WRI GHG Protocol, the Corporate value chain (Scope 3) accounting and reporting standard and the IPIECA standard, indirect Scope 3 GHG emissions are classified into categories and reported on the basis of a significance analysis, in relation to Eni's activities. For the Oil &amp; Gas Sector, the only category considered significant (~93% of the total) is the one related to the use of sold products (cat.11). For this category, emissions are estimated in accordance with the IPIECA (Net Volume Accounting) criterion, using Upstream equity hydrocarbon production as an asset figure, and assuming that the entire sold production of oil and natural gas is consumed during 2024. The calculation of emissions (through ISPRA emission factors) includes assumptions regarding the final destination of the products sold. The figure is assumed to be entirely calculated on the basis of data on primary activities (specifically data on sold production of hydrocarbons). The other categories are not reported as they are considered non-significant (7% of total Scope 3 emissions, equal to 195 MtCO<sub>2</sub>eq., of which ~1.2% Cat.1, ~1.2% Cat.10 and ~3% Cat.15). With regard to joint ventures, Associates, within or outside the value chain, only Scope 1 and 2 emissions were considered.</p> <p>Biogenic CO<sub>2</sub> Scope 3 emissions are estimated at approximately 2 and 3.1 MtCO<sub>2</sub>eq. in 2023 and 2024 and refer to the combustion of biofuels sold, and the combustion of biomethane injected into the grid, calculated on the basis of DEFRA factors.</p>   |
| <b>Methane intensity</b>                       | <p><b>Upstream methane emission intensity</b>: calculated as the ratio of direct methane emissions expressed in m<sup>3</sup> of CH<sub>4</sub> and the sold natural gas production of upstream assets.</p>  |



| DATAPOINT                                | METHODOLOGY  |
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| Other emission indicators                | <p><b>Eni's Net Carbon Footprint:</b> the indicator considers Scope 1 and 2 GHG emissions of the activities operated by Eni or third parties, accounted for on an equity basis. The result is net of the use of high-quality carbon credits, mainly obtained from Natural Climate Solutions (NCS).</p> <p><b>Net Carbon Footprint Upstream:</b> the indicator considers Scope 1 and 2 GHG emissions of the Upstream assets operated by Eni and third parties, accounted for on an equity basis. The result is net of the use of high-quality carbon credits, mainly obtained from NCS.</p> <p>In 2024, the Global Warming Potential (GWP) coefficients for conversion to CO<sub>2</sub> equivalent have been updated to the values published by IPCC AR6. The time series has been accordingly revised.</p>  |
| Lifecycle Indicators                     | <p><b>Net GHG lifecycle emissions:</b> the indicator refers to absolute Scope 1+2+3 GHG emissions associated with the supply chain of energy products sold by Eni, including both those deriving from its own production and those purchased from third parties, accounted for on an equity basis. The result is net of the use of high-quality carbon credits, mainly obtained from Natural Climate Solutions (NCS). Unlike Scope 3 (end-use) emissions, which Eni reports on the basis of Upstream production, the Net GHG Lifecycle Emissions indicator has a much broader reference domain, representing Scope 1, 2 and Scope 3 emissions referring to the entire supply chains of energy products sold by Eni, also including Scope 3 emissions associated with gas purchased from third parties and petroleum products sold by Eni.</p> <p><b>Net carbon Intensity:</b> the indicator is calculated as the ratio between Net GHG Lifecycle Emissions and the energy content of energy products sold by Eni, accounted for on an equity basis.</p>  |
| Installed capacity from renewables       | <p>The indicator measures the maximum capacity of electricity generation plants from renewable sources in Eni's share (wind, solar, wave and any other non-fossil source deriving from natural resources, excluding nuclear energy). The capacity is defined as installed when the plants are in operation or when the "mechanical completion" is reached, which represents the final phase of construction of the plant with the exception of the connection to the grid.</p>   |
| Biorefining                              | <p><b>Biorefining capacity:</b> maximum authorized processing capacity at the Ecofining plant of each biorefinery.</p> <p><b>Sold production of biofuels:</b> the production of biorefineries is expressed in terms of HVO (Hydrotreated Vegetable Oil) according to the definition provided in the reference regulations and includes all the fractions of HVO that can be produced: diesel HVO, jet HVO, naphtha HVO and LPG HVO. For the classification of organic production, reference is made to the dedicated articles/paragraphs of the EU renewable directives (Renewable Energy Directive and related ones), and national transposition provisions (e.g. for Italy the implementing legislative decrees), for productions sold in Europe and to the EPA (Environmental Protection Agency of the USA, including Renewable Fuel Standard Program) provisions for productions sold in the United States.</p>  |
| Energy production from renewable sources | <p>Electricity produced by the exploitation of a renewable source (wind, solar, wave and any other non-fossil source deriving from natural resources, excluding nuclear energy).</p>   |
| Carbon Credits                           | <p>Certificates generated on a voluntary basis through an emission reduction or absorption/removal project. One carbon credit is equivalent to 1 metric ton of CO<sub>2</sub> equivalent. Eni uses high-quality carbon credits, certified according to the highest international standards both for the climate change mitigation component (such as the Verified Carbon Standard - VCS) and for the contribution to the achievement of the Sustainable Development Goals - SDGs (such as the Sustainable Development Verified Impact Standard - SD ViSta and Climate, Community and Biodiversity - CCB).</p> <p>For Eni's net decarbonization targets, receivables from projects supported by Eni and receivables from Plenitude customers (Eni's share) are considered. A portion of Plenitude customers'credits relates to gas consumption invoiced from October to December of the reporting year is estimated and will instead be offsetted by October of the following year.</p>   |
| Energy                                   | <p><b>Energy consumed:</b> Eni's energy consumption balance is calculated as follows: (i) each of the energy vector is converted into TOE - (common unit of measurement) according to the appropriate conversion factors indicated at site/company level; (ii) for each energy carrier, Eni's consumption is then calculated as the sum of the production and import values from companies outside Eni's consolidation boundary, from which the export values to companies outside the Eni's consolidation boundary are then subtracted (for the purposes of calculating the Eni energy balance, the consolidation of the data takes place excluding internal exchanges between sites/companies of the group); (iii) the consumption of all the individual energy vectors is converted into MWh and their sum represents Eni's energy balance. In particular, the parameters considered are: (i) <b>Total energy consumption</b> (as the sum of <b>Fossil energy consumption</b> and <b>Renewable energy consumption</b>); (ii) <b>Fossil energy consumption</b> is given by the sum of Fuel consumption from natural oil and petroleum products, Fuel consumption from natural gases, Consumption of fuel from other fossil resources and Consumption of electricity, heat, steam and cooling acquired or purchased from fossil sources; (iii) <b>Renewable energy consumption</b> is given by the sum of Fuel consumption from renewable sources, including biomass, Consumption of electricity, heat, steam and cooling acquired or purchased from renewable resources and Consumption of non-combustible, self-produced renewable energy. <b>The production of non-renewable energy is also represented</b>, as the total production of primary sources.</p> |

**ENVIRONMENTAL BOUNDARY**

For information related to the other environmental standards (E2, E3, E4, E5), the following boundaries apply: (i) an operational control boundary, which includes Eni SpA, its subsidiaries, the relevant leasing contracts, 100% of the data from the operated joint operations (incorporated and unincorporated) and 100% of the data from operated joint ventures and associates; (ii) an integration relating to Eni share in non-operated joint operations and its share in the operating companies. The expenses (CapEx and OpEx) reported for all environmental data refer to Eni operated boundary.

**DATAPOINT****METHODOLOGY****POLLUTION****Air emissions**

**NO<sub>x</sub>**: total direct emissions of nitrogen oxides due to combustion processes with air. Including NO<sub>x</sub> emissions from flaring, sulfur recovery processes, FCC regeneration, etc., including NO and NO<sub>2</sub> emissions, and excluding N<sub>2</sub>O. **SO<sub>x</sub>**: total direct emissions of sulphur oxides, including SO<sub>2</sub> and SO<sub>3</sub> emissions. **NMVOCS**: total direct emissions of hydrocarbons, substituted hydrocarbons and oxygenated hydrocarbons, which evaporate at room temperature. LPG is included and methane is excluded. **PM**: direct emissions of finely divided solid or liquid material suspended in gaseous streams. Standard emission factors. The data for these pollutants correspond to total emissions and not to those above the thresholds of the European E-PRTR regulation.

**Other E-PRTR pollutants**: refer to the values of additional pollutants that have exceeded the emission threshold indicated in Annex II of Reg. 166/06 - EPRTR in at least 2 Eni sites in Europe, with data referring to 2023 only.

Reporting of emissions to air and water currently follows a combination of direct measurements, calculations and other estimation methods, favoring the use of measured data where available, in particular for sources subject to direct monitoring. For air emissions, which generally include conveyed emissions, governed by authorization requirements that require compliance with Emission Limit Values and, consequently, monitoring according to the regulations and the EU BREF standard on monitoring. Alternatively, emissions are estimated predominantly on the basis of fuel consumption data or fluxes sent for combustion, using appropriate emission factors. For non-conveyed emissions, in particular for Non-Methane Volatile Organic Compounds, estimates are derived from the results of leak detection and repair campaigns and the application of recognised algorithms, such as those used for diffuse emissions estimation.

**Emissions to water**

In relation to pollutants in water discharges, final discharges are subject to monitoring according to authorisation requirements and derive from measurements carried out with certified sampling and analysis methods. With regard to contaminants emitted into water, at each Eni site, there is a discharge sampling plan which, unless otherwise indicated by specific authorisations or operational and control requirements, requests analyses for significant and typical parameters for each discharge point, carried out in compliance with existing regulations and methodologies or company guidelines.

**Other E-PRTR pollutants**: the values of additional pollutants that exceeded the applicable emission threshold indicated in Annex II of Reg. 166/06 - EPRTR in at least 2 Eni sites are also reported, with data referring to 2023 only.

In line with the requirements of ESRS E2-4, the annual quantities of additional pollutants emitted respectively into the air and into water from sites that have exceeded the applicable emission threshold indicated in Annex II of Reg. 166/06 - EPRTR are reported.

**Spill**

**Oil spill**: spill from primary or secondary containment into the environment of oil or petroleum derivatives from refining or petroleum waste occurring during operational activity or as a result of acts of sabotage, theft and vandalism. For oil spills from sabotage, the timing of the closure of some investigations and subsequent recording of the data may be extended due to the duration of the investigations themselves. The volumes spilled are estimated, by Eni's various operating entities, using specific calculation models and according to the operating parameters monitored. It should be noted that the events reported in this document are only those that have resulted in spills greater than 1 barrel.

**Chemical spill**: Spillage of a process or service chemical product that is hazardous to humans or the environment, including drilling fluids or NADFs, excluding crude oil products or refining derivatives and petroleum waste, occurring during normal operating activities. The volumes spilled are estimated by Eni's various operating entities using specific calculation models and according to the operating parameters monitored.

**WATER RESOURCES****Water**

**Total water withdrawals**: sum of seawater, fresh water (from surface water, aqueduct and subsoil), brackish water, industrial water from third parties, including steam and condensate, rainwater used in the industrial cycle, from GTP (groundwater treatment plant) and any other water flow entering the site and used in the industrial cycle.

**Total water consumption**: difference between incoming and outgoing water, attributable to evaporation, water associated with products and treatments (e.g. sludge from water treatment plants) and uncontrolled leaks (e.g. leaks from the distribution network). In addition to the water withdrawn, unused rainwater and any other incoming water flow, even if not used in the industrial cycle, contribute to the flows entering the site. At the exit from the site, both water discharges through sewerage, treatment plant, tanker truck or any other method whose final recipient is the environment, and flows destined to third party users, such as demi/industrial water or steam, are counted. Wastewater destined to evaporative basins or discharged into deep geological formations contributes to consumption.

**Total water discharges**: sum of seawater discharged and fresh water discharged or sold to third parties. Direct measurement using flow meters; calculation as the sum of discharges to all the different destinations.

**Recycled or reused fresh water**: water that has already been used for industrial use for the first time, reused one or more times in the production cycle/industrial site before discharge, after any treatment. The quantity indicated takes into account both the volumes used and the number of times this quantity is used.

**Percentage of fresh water recycled or reused**: percentage of fresh water recycled or reused compared to the sum of fresh water recycled or reused and fresh water withdrawn.

**Reinjected production water**: formation or stratum water associated with the extracted oil and produced with it (onshore and offshore), re-injected (EOR) or injected for disposal purposes.

Mm<sup>3</sup> = mmcm



| DATAPOINT                                | METHODOLOGY   |
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| Type of water                            | <p><b>Seawater:</b> water with a total dissolved solids (TDS) content greater than or equal to 30,000 mg/l.</p> <p><b>Brackish water:</b> water with a maximum total dissolved solids (TDS) content between 2,000 mg/l and 30,000 mg/l.</p> <p><b>Fresh water:</b> water with a maximum total dissolved solids (TDS) content of 2,000 mg/l.</p> <p><b>Water from GTP:</b> represents the share of polluted groundwater treated and reused in the production cycle.</p> <p>The estimation of volumes is carried out by direct measurement using flowmeters; other approaches involve estimating the capacity of the pumps and operating time (e.g. for seawater) or volumes are estimated on the basis of billed consumption. It is specified that this stream is included in the calculation of fresh water withdrawals when present.</p>   |
| <b>BIODIVERSITY</b>                      |   |
| Overlapping area                         | <p><b>Number of sites overlapping with protected areas and Key Biodiversity Areas (KBAs):</b> operational sites in Italy and abroad, which are located within (even partially) the boundaries of one or more protected areas or KBAs (at the end of the year).</p> <p><b>Number of sites "adjacent" to protected areas and Key Biodiversity Areas (KBAs):</b> operation sites in Italy and abroad that, although located outside the boundaries of protected areas or KBAs, are less than 1 km away (at the end of the year).</p> <p><b>Number of Upstream concessions "overlapping" with protected areas and Key Biodiversity Areas (KBAs):</b> active national and international operated concessions, under development or in production, overlapping with one or more protected areas or KBAs, where development/production operations (wells, sealines, pipelines and onshore and offshore installations, as documented in the Company GIS geodatabase) are located within the intersection zone.</p> <p><b>Number of Upstream concessions "adjacent" to protected areas or Key Biodiversity Areas (KBAs):</b> active national and international operated concessions, under development or in production, overlapping with one or more protected areas or KBAs, where development/production operations (wells, sealines, pipelines and onshore and offshore installations, as documented in the company's GIS geodatabase) are located outside the intersection zone.</p> <p>Sources: World Database on Protected Areas WDPa, World Database of Key Biodiversity Areas WDKBA, data available through UNEP-WCMC (UN Environment Programme - World Conservation Monitoring Center) Proteus Partnership membership. Limitations to be considered: (i) at the global level there is an overlap between the different databases of protected areas and KBAs, potentially leading to duplication in the analysis; (ii) although databases of protected or priority areas are updated, they may not be complete for every Country.</p>  |
| Area (hectares) of site/concession       | <p>To calculate the area of a site and its overlap with protected areas, the geographical data (the site and concession boundaries of interest) and the layers of the protected areas from official sources (WDPa, WDKBA) are imported in vector format (e.g. shapefile). It is then ensured that all the data are in the same spatial reference system. The site area is calculated (in hectares) using the GIS geometry functions. To determine the overlap with the protected areas, an intersection of the layers is made, measuring the overlapping area (in hectares) and, if relevant, expressing it as a percentage of the total site area.</p>   |
| <b>RESOURCE USE AND CIRCULAR ECONOMY</b> |   |
| Total waste                              | <p><b>Sum of Waste:</b> sum of <b>Waste from production activities</b> and <b>Waste from remediation activities</b>, with:</p> <ul style="list-style-type: none"> <li>• <b>waste from production activities:</b> includes all waste deriving from activities related to production activities. This includes waste from drilling activities and construction sites, waste from the maintenance of plants, buildings and areas used to carry out production activities. Waste deriving from remediation activities or in any case not related to production activities is excluded.</li> <li>• <b>waste from remediation activities:</b> these include those from soil safety and remediation activities, demolitions and groundwater classified as waste.</li> <li>• <b>non-recycled waste:</b> the sum of those sent to landfill, incineration or other disposal.</li> <li>• <b>hazardous waste:</b> classified according to local legislation and, where not available, on the basis of the references of the Basel Convention and by the European Commission Decision 2000/532/EC of May 3, 2000.</li> </ul> <p>The method of waste disposal is communicated to Eni by the person authorised for the activity. The weight of the waste produced and delivered can be measured or estimated, depending on the case; the difference between the waste produced and that sent for recovery/disposal can derive both from a change in the quantities in storage and from the fact that the weight of the waste produced must often be estimated, while that of the waste delivered can be more frequently detected at the exit of the site or at the destination plant.</p> <p>Recycled/recovered waste is defined as waste that is not intended for disposal.</p> <p>The disclosure of recovery, divided between preparation for reuse, recycling and other recovery, is not available because the legal documents show the first operation to which the waste is subject to which generally does not unequivocally relate to the aforementioned categories. Any detail would therefore be the result of estimates and strong approximations of poor quality.</p> |

**SOCIAL BOUNDARY**

For information relating to own workforce (other than information relating to safety), the boundary includes Eni SpA and its subsidiaries consolidated on a line-by-line basis. For information related to safety, the following boundaries apply:

a. an operational control boundary, which includes Eni SpA, the subsidiaries consolidated on a line-by-line basis, 100% of the data of the operated joint operations (incorporated and unincorporated) and 100% of the data of operated joint ventures and associates;

b. a voluntary "Entity Specific" boundary in line with the data presented in previous sustainability reports, based on which targets are defined.

Expenses (CapEx and OpEx) reported for safety data refer to the first view. With regards to data related to investments for local development, the scope includes Eni SpA, its subsidiaries, the entities under operational control, as well as some joint ventures in which Eni plays a significant role in the management of local stakeholders. With regard to the data referring to security, this includes both private security personnel who work contractually for Eni and personnel of the public Security Forces, military or civilian, who carry out, even indirectly, security activities and/or operations to protect Eni's people and assets. With regard to quantitative information relating to anti-corruption training and reporting files, the scope includes Eni SpA and its subsidiaries.

**DATAPOINT****METHODOLOGY****HUMAN RIGHTS FOR ENI****Severe Human  
Right Incidents**

Severe human rights incidents, dealt with in the various social chapters, were calculated on the basis of cases identified in 2024 through grievance mechanisms and whistleblowing reports. With regard to cases concerning Eni's workforce and workers in the value chain, reliable cases of forced labour, human trafficking, child labour and health and safety were considered. No grievances or relevant and reliable reports were received in the context of local communities or end consumers. For the purpose of progressively improving the quality and completeness of the data, the opportunity to extend the reference boundary will be evaluated for the next years.

**ENI'S WORKFORCE****Employees**

The methodology used is that of the head count. Employment figures differ from those published in the Financial Report because they include only the companies consolidated on a line-by-line basis.

**Permanent/fixed-term workers:** a permanent or fixed-term employment relationship that takes place with the full ordinary duration of the service in accordance with the provisions of the law or collective labour agreements.

**Full-time workers:** employment relationship that takes place with the full ordinary duration of the service in accordance with the provisions of the law or collective labour agreements.

**Permanent/fixed-term part-time workers:** a permanent/fixed-term employment relationship that takes place with a reduced hourly duration compared to the ordinary duration provided for by law or collective bargaining agreements; they can be vertical, horizontal or mixed part-time contracts.

**Turnover rate:** ratio between the number of permanent employees who left the company in the reference year and the total number of permanent employees of the company in the year -1.

**Non-employees:** refers to staff leased in Italy and abroad, calculated using the head count method. Self-employed workers who, having a contract for the supply of professional services as their basis, are considered among the suppliers and not included.

**Average age of Eni's people:** sum of the age of Eni employees worldwide divided by the total number of employees worldwide.

**Training hours**

Hours used by employees of Eni SpA and its subsidiaries in the training courses managed by Eni Corporate University (classroom and distance) and in the activities carried out by Eni's Business/Company areas independently, also in on-the-job training mode.

**Average hours of training:** total hours of training divided by the average number of employees in the year.

**Human rights training:** hours used by employees in dedicated courses.

**Employees who have received human rights training:** a percentage calculated as the ratio of the number of enrolled employees who have completed a training course to the total number of employees enrolled.

**Total training expenses:** total costs incurred for training activities designed and/or purchased both by Eni corporate University and Eni's Business/Companies areas for the benefit of employees.

**Average spending on training for full-time employees:** total spending on training divided by the average number of employees in the year.

**Performance  
review**

**Employees covered by performance evaluation tools:** the percentage refers to the number of employees who have been assigned an objective sheet (with reference to middle managers and young graduates).

**Employees covered by annual review:** the percentage refers to the number of employees covered by annual review (the figure refers exclusively to managers, middle managers and young graduates divided between men and women).

**Worked hours**

Worked hours by employees or worked hours by contract staff, as the sum of contractual hours and overtime, net of holidays, absences due to illness and leave not recovered. For personnel operating on platforms and ships, the number of 12 hours per day on board is conventionally assumed, as indicated by sector guidelines (IOGP), and for personnel operating on LNG carriers 24 hours are considered. In many companies, the KPI is calculated by attendance tracking systems. In the absence of more precise methods, the worked hours can be calculated for each worker on the basis of the weekly contractual hours.

**Whistleblowing  
reports**

**Files of reports (assertions) relating to respect for human rights:** relating to Eni SpA and its subsidiaries, closed during the year and relating to human rights; the number of allegations broken down by outcome of the investigation conducted on the reported facts (well-founded and unfounded/unascertainable/not applicable) is reported. Anonymous reports, by their nature, have not been taken into account for the purposes of calculating reports relating to employees.



| DATAPOINT                | METHODOLOGY   |
|--------------------------|---|
| Parental leave           | The rate of use of parental leave is calculated through the ratio between the number of people who used it during the year and the number of employees who are entitled to use parental leave (100% of Eni employees).  |
| Industrial relations     | The minimum notice period for operational changes is in line with the provisions of current laws and trade union agreements signed in the individual Countries in which Eni operates. Both in Italy and abroad, employees covered by collective bargaining are those employees whose employment relationship is governed by collective contracts or agreements, whether national, category, company or site, with the exclusion of individual agreements. For this indicator, tenured employees (companies with which the employee enters into the employment contract) are considered.   |
| Remuneration and Wages   | <p>The <b>Total Remuneration Ratio</b> is calculated as the ratio of the highest paid employee in the organization and the median of other employees, globally, on fixed remuneration and overall remuneration which from 2024 includes benefits in kind and allowance.</p> <p>The <b>Gender Pay Gap</b> is calculated as the difference between the average hourly wage of the male population and the average hourly wage of the female population divided by the average hourly wage of the male population; the hourly wage is obtained by dividing the annual wages of men and women by a conventional number of hours per year. The gender pay gap is calculated on fixed remuneration and overall remuneration, which from 2024 includes benefits in kind and allowances.</p> <p><b>Minimum wages</b> are defined by law in the various Countries or, where not provided, by national collective agreements separately for each Country. They are calculated for the lowest salary category, i.e. with reference to the fixed and total remuneration of blue-collar level employees or, for Countries where Eni does not have blue-collars, white-collar employees.</p>  |
| <b>HEALTH AND SAFETY</b> |   |
| Safety                   | <p><b>Total Recordable Injuries:</b> sum of Lost Time Injuries (LTI), Restricted Work Day cases (RWDC), and Medical Treatments (MTC).</p> <p><b>TRIR:</b> Total Recordable Injury Rate (numerator: number of total recordable injuries; denominator: worked hours in the same period). For better readability, the ratio is multiplied by 1,000,000.</p> <p><b>Fatality index:</b> index with the number of fatalities that occurred as the numerator and the worked hours in the same period as the denominator. For better readability, the ratio is multiplied by 100,000,000.</p> <p><b>Near Miss:</b> an incidental event whose origin, development and potential effect are of incidental nature, but differs from an accident only because the outcome was not harmful due to favourable and fortunate concurrences or mitigating intervention of technical and/or organizational protection systems. Incidental events that have not turned into incidents should therefore be considered as near misses.</p> <p>For the assessment of accident KPIs, Eni implements and integrates, through its internal procedures, the IOGP guidelines on work-relatedness events, also taking into account the Country risk.</p> <p><b>Contractors:</b> all indicators relate to contractors/subcontractors or Technology Partners operating exclusively in contract mode 1 or 2 as defined below are considered:</p> <ul style="list-style-type: none"> <li>• <b>Mode 1:</b> the contractor/subcontractor provides people, processes and/or equipment for the execution of the contract under the oversight, instructions and HSE Management System of Eni. The contractor has a management system to provide assurance that the personnel for whom it is responsible are qualified and fit for the work and that the processes, tools, materials and equipment they provide are properly maintained and suitable for the contract. This mode requires the contractor to report HSE performance data.</li> <li>• <b>Mode 2:</b> the contractor/subcontractor provides people, processes, equipment and/or facilities for the execution of the contract, as a main rule, under its own HSE Management System, providing the necessary instructions and oversight and verifying the proper functioning of its system. This mode requires interfacing or bridging with Eni management system and also reporting HSE performance data. Eni is responsible for assuring the overall effectiveness of the HSE management controls put in place by the contractor, including its interface with Subcontractors, and ensuring that both Eni's and the contractor's HSE Management Systems are compatible.</li> </ul> |
| Health                   | <p><b>Number of cases of recordable occupational diseases in its workforce:</b> number of reports of occupational diseases.</p> <p><b>Main types of diseases:</b> the reports of suspected occupational diseases reported to the employer concern pathologies that may have a causal link with the occupational risk, as they may have been contracted in the exercise of work activities with prolonged exposure to risk agents present in the workplace. The risk can be caused by the processing or by the environment in which the work itself takes place. The main risk agents whose prolonged exposure can result in an occupational disease are: (i) chemical and carcinogenic agents (e.g. of diseases: neoplasms, diseases of the respiratory system, blood diseases); (ii) biological agents (e.g. of disease: malaria); (iii) physical agents (e.g. of disease: hearing loss). Other types of risk that can give rise to occupational diseases in the workplace are: (iv) ergonomic risks (e.g. of disease: musculoskeletal pathologies); (v) psychosocial risks (e.g. of disease: adjustment disorder). This list is in line with the ILO List of Occupational Diseases.</p> <p><b>Number of reports of occupational disease filed by heirs:</b> indicator used as a proxy for the number of deaths due to occupational diseases.</p>  |
| Process safety incident  | Loss of primary containment (unplanned or uncontrolled release of any material, including non-toxic and flammable materials) from a "process". Process safety incidents are classified, according to severity, into Tier 1 (most serious), Tier 2, Tier 3 (least severe).   |



| DATAPOINT                                | METHODOLOGY   |
|--|---|
| <b>LOCAL COMMUNITIES</b>                 |   |
| <b>Local Community Identification</b>    | Through the ESHIA studies, conducted before the start of business activities, the following are defined: the Area of influence, i.e. the area within which the project activities can potentially influence the resources/receptors and within which the potential impacts (both direct and indirect) must be assessed and the Study Area that must be studied in the process, in order to understand and adequately characterize the reference scenario. In particular, in these studies conducted taking into account the different characteristics of business activities, both the communities that live or work near operations and those present in the areas of influence are mapped.  |
| <b>Investments for local development</b> | The indicator refers to Eni's share of expenditure on local development initiatives carried out by Eni in favour of the territory to promote community development in operational contexts. The figure refers to all Eni companies, including companies not operated by Eni.  |
| <b>Resettlement activities</b>           | With regard to any economic and physical displacement related to temporary or permanent involuntary resettlement, Eni fully adopts the IFC's performance standard number 5 in every development project carried out.  |
| <b>Security</b>                          | <p><b>Security forces who have received training on human rights:</b> the indicator includes both private security personnel who work contractually for Eni and public security forces, whether military or civilian, who carry out, even indirectly, security activities and/or operations to protect Eni's people and assets.</p> <p><b>Security personnel who have received Human Rights training:</b> ratio between the Number of Security Personnel (professional family) who have received Human Rights training and the total number of Security personnel (professional family).</p> <p><b>Security contracts containing human rights clauses:</b> percentage calculated as the ratio between the "Number of security and security concierge contracts with human rights clauses" and the "Total number of security and security concierge contracts".</p> <p><b>Number of Countries with armed guards:</b> the indicator relates to the number of Countries in which Eni has armed guards.</p> |
| <b>Grievance</b>                         | The total number of grievances corresponds to the number of grievances received by the company from stakeholders. The number of grievances resolved corresponds to the number of grievances for which the company and the complainant have agreed on a proposal for termination, regardless of the year in which the grievance was expressed.   |

**BUSINESS CONDUCT BOUNDARY**

With regard to audits with anti-corruption checks, reference is made to Eni SpA, directly or indirectly controlled companies (excluding listed companies with their own internal audit control), investee companies on the basis of specific agreements, and third parties considered to be at greater risk, where provided for in the relevant contracts entered into with Eni. With regards to the indicators related to suppliers involved in awareness, measurement and collaboration initiatives on ESG issues, the boundary of analysis refers to the scope covered by the MSG Procurement. As regards the data relating to cases of ascertained corruption also with reference to the ones that led to layoffs or other measures, reference is made to Eni SpA and its subsidiaries. The figure relating to the average payment terms of suppliers is calculated with reference to Eni SpA and its subsidiaries for which the payment activities of suppliers are carried out centrally by Eni SpA. Finally, with regard to legal proceedings due to late payments still outstanding in the reporting year, the figure refers to Eni SpA and its Italian subsidiaries.

| DATAPOINT                                  | METHODOLOGY  |
|--|--|
| <b>BUSINESS CONDUCT</b>                    |  |
| <b>Payment practices towards suppliers</b> | The average payment time of suppliers is calculated with reference to Eni SpA and the subsidiaries whose payment activities of suppliers are carried out centrally by Eni SpA. The number of legal proceedings for late payments is recorded with reference to cases related to sums recognised and not disputed (on the merits and/or in their amount) by Eni to the supplier and pending in Italy; the information includes disputes pending in the reporting year, even if initiated previously or concluded during the year. The figure refers to proceedings concerning procurement contracts for the purchase of goods, the execution of works and the supply of services, within the framework of the internal regulatory and management framework on procurement (Management System Guidelines "Procurement") and stipulated by Eni SpA and its Italian subsidiaries (see list), with the exception of the following companies, for which the data is not currently available: Agenzia Giornalistica Italia SpA, Eni Gas Transport Services Srl, Eni Insurance SpA, Eni West Africa SpA, Enimoov SpA, Finproject SpA, Industria Siciliana Acido Fosforico - ISAF - SpA - in liquidazione, Mater-Agro Srl, Mater-Biotech SpA, Matrica SpA, Novamont SpA, REWAVE S.r.l., SeaPad SpA, Tecnofilm SpA. The figure also includes disputes relating to contracts that are no longer active or expired in the reporting year. The Company is structuring a phased process that allows it to expand the scope of its analysis (and in particular the data required by ESRs G1-6 DP 33 a) and c)). |
| <b>Anti-corruption/ Transparency</b>       | <p><b>Audit interventions (with anti-corruption checks):</b> audit activities that also include assessments of processes exposed to anti-corruption risks, as defined by the relevant Eni regulatory instruments.</p> <p><b>Established corruption cases:</b> final convictions relating to criminal proceedings for domestic and/or international corruption in which there has been a finding of corruption on the merits.</p> <p><b>Countries with Eni's participation in EITI multi-stakeholder groups:</b> Countries where Eni participates in EITI initiatives both directly and indirectly (at the level of trade associations) in the Multi-stakeholder Groups set up at local level.</p>  |



| DATAPOINT | METHODOLOGY  |
|-----------|--|
| Suppliers | <p><b>N° suppliers involved in awareness, measurement and collaboration initiatives on ESG issues:</b> number of suppliers registered on the Open-es platform.</p> <p><b>% of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG issues:</b> Ratio between the total number of active contracts assigned to suppliers registered on Open-es and the total number of active contracts.</p> <p><b>% of the value of active contracts with suppliers involved in ESG awareness, measurement and collaboration initiatives:</b> Ratio between the total value of active contracts assigned to suppliers registered on Open-es and the total value of active contracts.</p> <p>The metrics refer to the engagement activities carried out with suppliers managed as part of MSG-Procurement by Eni SpA and its subsidiaries. The supplies excluded from the scope of application are the ones outside the MSG Procurement: raw materials, semi-finished products, products for resale and relevant incidental accessories (including agency services); primary logistic services (transport and storage), transport on transit or interconnection networks (for instance oil pipelines, gas pipelines, dispatching networks); production process utilities (such as electricity, hydrogen); site services from/to companies situated on the same industrial site, aimed at ensuring the smooth operation of production activities; production services for semi-finished and finished products (for instance productive capacity); special products for processing of raw materials, semi-finished and finished products; carbon credits and similar instruments; exploration and production licences; financial services/products; real estate properties (land and buildings including leases); non-judicial legal and technical assignments in the framework of corporate law and/or corporate governance; notary services; insurance contracts; contracts to either brokers or insurance and reinsurance companies; contracts with commercial network operators; co-marketing agreements and commercial partnerships; registration and/or purchase of internet domains; consulting contracts with members of Journalists' Association; contracts for the purchase of information and "data packages" relating to data connected with exploration activities (e.g. geophysical, geological data, etc.) and purchased directly from State Owned or Government Owned Agencies, or Licensed Companies/data owners, with the limitation to "bid-rounds" classified as urgent; assignments to advisors for merger &amp; acquisition operations, project financing and capital market; assignments regarding consultancy on administrative-accounting/tax matters and assignments for providing juridical assistance in tax litigation; assignments strictly required to safeguard either health, security, environment or public safety in the event of emergencies, to be awarded directly by the company manager formally appointed as Employer; sponsorship contracts/agreements; contracts/agreements relating to non-profit initiatives; procurement of exhibition areas; technical consulting assignments either in the judicial or in the out of court framework; assignments to external lawyers; collaboration/cooperation agreements R&amp;D; contracts in the R&amp;D framework for the acquisition of licenses and patents by third-parties or for granting either the licence to use or the transfer and/or marketing Eni's know-how; assignments in both the judicial and out-of-court frameworks, for technical and legal assistance regarding the subjects of employment, trade unions and social security; employment contracts and contracts with temporary agency workers, if required by local law; support services for job orientating activities, employer searching and branding; training activities (courses, seminars, workshops, conferences) provided by external entities at their offices and provided indistinctly to the public; contracts for the purchase of goods and security services; auditing assignments and other assignments strictly connected with auditing activities, excepted for the award of framework agreements approved by Eni SpA procurement function; contracts with external members of the Watch Structures; appointments to lawyers and professionals, individual or associates, for non-judicial specialized consulting services and for non-judicial consultancy, relevant to the Integrated Compliance Function; assignments related to regulatory issues.</p> |



# ANNEX TO EU TAXONOMY

## 1. Content of KPIs

### 1.1. SPECIFICATION OF KEY PERFORMANCE INDICATORS (KPIs)

#### 1.1.1. KPI related to turnover (turnover KPI)

Eni Group’s consolidated financial statements are prepared in accordance with the International Financial Reporting Standards “IFRS” as adopted by Commission Regulation (EC) 1126/2008. In compliance with that, the Group turnover and the turnover relating to Taxonomy-aligned economic activities and to Taxonomy-eligible

economic activities (not Taxonomy-Aligned activities) have been recognized pursuant to International Accounting Standard (IAS) 1, paragraph 82 a). The 6.1% share of eligible and aligned turnover is calculated as the part of turnover derived from eligible or aligned economic activities (numerator) divided by total turnover (denominator). Eligible and aligned economic activities are described under paragraph 1.2.2. The denominator comprises the Sales from operations (Revenues) line from the Consolidated Statement of Income. A reconciliation is provided below:

#### TURNOVER

|  | (€ mln) | Aligned activities | Eligible activities | Total Group |
|--|---------|--------------------|---------------------|-------------|
| Revenues from contracts with customers |         | 812                | 4,601               | 88,797      |

The proportion of turnover referred to in Article 8(2), point (a), of Regulation (EU) 2020/852 “turnover KPI” is calculated as the part of the turnover derived from products or services associated with Taxonomy-aligned economic activities (numerator), divided by the Group total turnover (denominator). The Group turnover and the turnover of eligible and aligned economic activities are recognized net of the effects of commodity derivatives activated to manage the Group’s exposure to movements in the prices of energy commodities, which qualify and are designated as cash flow hedges due to the efficacy of the relationship between the instrument and the hedged item, whereby a cash flow is either paid or received at the delivery of the underlying commodity. The mark-to-market of cash flow hedges relating to a forecast transaction are taken to other comprehensive income. Other commodity derivatives utilized by the Group to manage exposure to the commodity risks, which lack the requirements to be recognized in accordance with the own use exemption or to be qualified as hedges in accordance with IFRS, are marked to market with gains or losses recognized through profit and loss in a separate line item from revenues. Such line item comprises the ineffective portion of cash flow hedges.

#### 1.1.2. KPI related to capital expenditure (CapEx) (CapEx KPI)

Capital expenditure “CapEx” of the Eni Group and the “CapEx” relating to eligible economic activities and to aligned economic activities

cover costs that are accounted based on: a) IAS 16 Property, Plant and Equipment, paragraphs 73, e), point i) and point iii); b) IAS 38 Intangible Assets, paragraph 118, e), point i); c ) IFRS 16 Leases, paragraph 53, point h). CapEx also covers additions to tangible and intangible assets resulting from business combinations. The Group does not engage in economic activities that are recognized in accordance with IAS 40 and IAS 41. The 10.6% share of CapEx of eligible and aligned economic activities is calculated as the part of CapEx derived from eligible or aligned economic activities (numerator) divided by total Group CapEx (denominator). Eligible and aligned economic activities are described under paragraph 1.2.2. The denominator comprises additions recognized in the financial year to the following line items of the Group’s assets reported in the Group statement of financial positions at December 31, 2024: “Property, plant and equipment”, “Intangible assets” and “Right of Use” as disclosed under footnotes no. 12, 13 and 14 to the Group consolidated financial statements, as well as the portion of purchase price allocated to PP&E and intangible assets with definite useful lives as part of the business combinations closed in the financial year. Costs incurred to purchase plant and equipment from suppliers whose payment terms matched classification as financing payables, have been recognized among additions to PP&E and are included in the denominator and, when applicable, in the numerator of the CapEx KPI.

A reconciliation is provided below:

## CAPEX

|   | (€ mln) | Aligned activities | Eligible activities | Total Group   |
|---|---------|--------------------|---------------------|---------------|
| Additions to tangibles and intangibles assets     |         | 980                | 388                 | 8,485         |
| Goodwill purchased                                |         |                    |                     | 33            |
| Additions to rights to use leased assets          |         | 11                 | 13                  | 2,114         |
| Acquisitions/Change in the scope of consolidation |         | 116                |                     | 2,731         |
| Other investment                                  |         | 115                | 18                  | 2,172         |
| Less  |         |                    |                     |               |
| Goodwill purchased                                |         |                    |                     | (33)          |
| <b>Total Capex</b>                                |         | <b>1,222</b>       | <b>419</b>          | <b>15,502</b> |

The proportion of CapEx referred to in Article 8(2), point (b), of Regulation (EU) 2020/852 "CapEx KPI" is calculated as the part of CapEx relating to aligned economic activities (numerator) divided by

the Group total CapEx (denominator) as specified in points 1.1.2.1. and 1.1.2.2. of Annex I to Commission Delegated Regulation (Eu) 2021/2178.

### 1.1.3. KPI related to operating expenditure (OpEx) (OpEx KPI)

The 15.9% share of eligible and aligned operating expenditure "OpEx" is calculated as the part of OpEx relating to eligible or aligned economic activities (numerator) divided by the Group total Opex

(denominator). Eligible and aligned economic activities are described under paragraph 1.2.2.

A reconciliation is provided below:

|   | (€ mln) | Aligned activities | Eligible activities | Total Group  |
|---|---------|--------------------|---------------------|--------------|
| Costs of R&D expensed through profit and loss |         | 12                 | 36                  | 178          |
| Operating expenses                            |         | 270                | 367                 | 4,131        |
| <b>Total Opex</b>                             |         | <b>282</b>         | <b>403</b>          | <b>4,309</b> |

The proportion of OpEx referred to in Article 8(2), point (b), of Regulation (EU) 2020/852 "OpEx KPI" is calculated as the Opex of aligned economic activities (numerator) divided by the Group total OpEX denominator as specified in points 1.1.3.1. and 1.1.3.2. of Annex I to Commission Delegated Regulation (Eu) 2021/2178.

## 1.2. SPECIFICATION OF DISCLOSURES ACCOMPANYING THE KPIS OF NON-FINANCIAL UNDERTAKINGS

### 1.2.1. Accounting policy

Economic and financial data relating to Eni's eligible and aligned economic activities for calculating the Taxonomy's KPIs and

proportion of eligible turnover, capex and opex, have been extracted from the Group accounting systems, the general ledger and the management accounting systems, which are used to prepare the separate financial statements of each consolidated subsidiary undertakings, mostly of which are in accordance with IFRS. Data extracted from separate financial statements are adjusted to align with the IFRS utilized in the preparation of the Group consolidated financial statements and for the consolidation transactions (intercompany sales and purchases, elimination of unrealized profit, etc.) to calculate Eni's Taxonomy KPIs and the eligible turnover, capex and opex proportion.

Therefore, data of turnover, OpEx and CapEx relating to Eni Group's aligned and eligible economic activities utilized in calculating the



Taxonomy KPIs and the proportion of eligible activities are the same the Group used in preparing the consolidated financial statements.

In the case of mono-business consolidated subsidiary undertakings performing a given eligible activity, relevant economic and financial data for the calculation of the Group eligible proportions have been extracted from the general ledger and the financial accounting to retrieve amounts of revenues, operating expenditures, additions to property, plant and equipment (PP&E) and intangible assets, additions to the right-of-use and additions to PP&E and intangibles resulting from business combinations. In case of multi-business subsidiary undertakings, relevant data for calculating the Group eligible proportions have been derived also from the systems of managerial accounting that splits the accounts of the financial system and allocates revenues and cost amounts to different reporting objects: profit centers which correspond to business units, product lines which can share common costs, plants, capital projects, cost centers, etcetera, to support management's understanding of the drivers of the financial performance and cost control.

Such structure of accounting flows, which is employed in preparing the Group consolidated financial statements, ensure that turnover, OpEx and CapEx are recognized by the economic activity where the underlying transactions occur, by this way avoiding double counting. This is explained by evidence that amounts recognized or allocated by the managerial accounting system are reconciled with the accounting system and the general ledger. Common costs are apportioned to different reporting objectives and economic activities based on disaggregation criteria that reflect how common inputs are absorbed.

Operating costs of Eni Group's companies to define the proportion of the opex of aligned and eligible activities to the Group total were determined on the basis of the managerial accounting system and Eni's control model of fixed costs which, starting from accounting data relating to purchases of goods and materials, services, labour costs and other charges, excludes raw materials costs, industrial plant variable costs and costs of products for resale and aggregates the remaining cost items in relation to the different measurement and control stages in the manufacturing/sale process:

- fixed industrial costs which include the labor costs for personnel involved in the maintenance, operation and servicing of industrial plants, third-party services (mainly maintenance contracted to third parties), general plant costs, consumables (spare parts) and include energy efficiency actions at buildings and other properties, as well as the purchase of outputs from aligned activities to achieve CO<sub>2</sub> emission reductions;
  - non-capitalised research & development costs;
  - commercial & marketing fixed costs;
  - general and administrative costs.
- For the purposes of reporting obligations, management has identified industrial fixed costs and non-capitalised R&D costs as the aggregate "opex" operating expenses corresponding to the definition of the denominator adopted by the Delegated Regulation on reporting.
- In line with the provisions, the opex incurred to purchase enabling products or in relation to enabling manufacturing processes have been claimed by the economic activities carried out by Eni in compliance with Art. 16 of the Taxonomy Regulation so that do not lead to a lock-in of assets that undermine long-term environmental goals, considering their economic lives. In this context, the opex incurred by the E&P sector to increase energy efficiency/reduce CO<sub>2</sub> emissions at oil & gas plants were excluded. This principle has also been applied to capex.

## 1.2.2. Assessment of compliance with Regulation (EU) 2020/852

### 1.2.2.1. INFORMATION ON ASSESSMENT OF COMPLIANCE WITH REGULATION (EU) 2020/852

Eni's eligible activities for purpose of assessing their substantial contribution to the objective of climate change mitigation are:

- 3.14 manufacture of organic basic chemicals: production of monomers and other basic chemicals;
- 3.17 manufacture of plastics in primary form: production of polyethylene and styrene's obtained by processing monomers and production of resins and plastics from renewable feedstock;
- 4.1 electricity generation using solar photovoltaic technology: photovoltaic installations are managed by the Group subsidiary Plenitude and are located mainly in Italy, Spain, USA, Australia, Kazakhstan and France;
- 4.3 electricity generation from wind power: the production is obtained from onshore windmills that are managed by the Group subsidiary Plenitude and are located mainly in Italy, Spain, Kazakhstan;
- 4.8 electricity generation from bioenergy: production of electricity in installations with a total rated thermal input below 2 MW and using gaseous biomass fuels;
- 4.10 development of energy storage facilities in Italy and the United States;
- 4.13 manufacture of biogas and biofuels for use in transport and of bioliquids: production of biofuels by means of hydrogenating bio-feedstock or waste organic materials. The manufactured product is a hydrogenated vegetable oil (HVO) that can be used as pure fuel or blended with fossil fuels to obtain a reduction



in emitted CO<sub>2</sub> from combustion. This activity is performed at the biorefinery of Gela (Sicily) and Venice with total production capacity of 1.1 mln tons/y;

- 4.20 cogeneration of heat/cool and power from bioenergy: production of steam and electricity by means of cogeneration, utilizing forestry biomass at the Crescentino plant (Italy);
- 5.3-5.4 construction, extension and operation of wastewater collection, treatment and supply systems and renewal of wastewater collection, treatment and supply system;
- 5.7-5.8 anaerobic digestion of biowaste: anaerobic digestion, biogas production and subsequent cogeneration for electricity production, as well as compost, at the Po' Energia Srl plant from organic fraction coming from the separate collection of municipal waste, as well as production of compost. Those activities are also eligible for the objective of circular economy (2.5 recovery of organic waste through anaerobic digestion or composting);
- 5.12 underground permanent geological storage of CO<sub>2</sub>: this activity leverages depleted reservoirs operated by Eni. The main ongoing projects are the HyNet hub in UK to upgrade Eni's depleted reservoirs in the Liverpool bay to permanently store CO<sub>2</sub> emitted by local businesses in hard-to-abate industries and the Ravenna hub, off Italy;
- 6.5 transport by motorbikes, cars and light commercial vehicles: Enjoy rental service based on the "free floating" model with collection and release of the vehicle at any point within the area covered by the service. The fleet consists of internal combustion, hybrid and electric vehicles;
- 6.15 infrastructure enabling low carbon road transport and public transport: this activity comprises construction, maintenance, and operations of electric charging points for EV, and is performed by Eni's subsidiary Plenitude.

The above-mentioned activities are also eligible for the objective of climate change adaptation. However, the Group does not engage in economic activities that manufacture productions and solutions for climate change adaptation. Therefore, the objective of climate change adaptation has been assessed as far as necessary to verify that each of Eni's eligible economic activities does not significantly harm any of the objectives of the Taxonomy, in compliance with art. 3 of regulation (UE) 2020/852.

Group economic activities eligible for the environmental objectives of DA 2023/2486 are immaterial.

As a result of the verification of the TSC for each eligible economic activity, Eni has assessed, as of the reference date of this Annual Financial Report, including the CSRD statement, that the following

activities are aligned with the Taxonomy as they make a substantial contribution to achieving the climate change mitigation objective are in compliance with the DNSH criteria.

### 3.17. MANUFACTURE OF PLASTICS IN PRIMARY FORM

The economic activity includes: (i) production of resins, especially biodegradable and compostable polyesters and copolyesters, derived in whole or in part from renewable raw materials; (ii) production of biodegradable and compostable plastics, i.e., blends of resins derived in whole or in part from renewable raw materials. These production lines belong to Novamont, whose control was acquired in the fourth quarter of 2023.

The economic activity "Manufacture of plastics in primary form" is a transitional activity as of Article 10, paragraph 2, of Regulation (EU) 2020/852 if it meets the technical screening criteria described at the point 3.17 of Regulation (EU) 2021/2139.

#### *Substantial contribution to climate change mitigation*

For the assessment of substantial contribution to climate change mitigation, criterion c) related to activity 3.17 as stated in EU Regulation 2021/2139 was applied, as follows: c) derived in whole or in part from renewable raw materials, and the greenhouse gas emissions over their life cycle are lower than the greenhouse gas emissions in the life cycle of equivalent primary form plastics manufactured from fossil fuels. Greenhouse gas emissions over the life cycle are calculated using Recommendation 2013/179/ EU or, alternatively, ISO 14067:2018 or ISO 14064-1:2018. Greenhouse gas emissions quantified over the life cycle are verified by an independent third party. Agricultural biomass used for manufacturing of plastics in primary form meets the criteria of Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used for manufacturing of plastics in primary form meets the criteria of Article 29, paragraphs 6 to 7, of the same directive.

In this context, chemicals derived from hydrocarbons were identified as equivalent to resins and plastics derived in whole or in part from renewable raw materials. These equivalent chemicals were identified considering chemical equivalence in terms of composition and equivalence in the chemical family. For both product lines, the hydrocarbon-derived equivalent is PBAT. Subsequently, emissions from Novamont's activity and the hydrocarbon equivalent were calculated based on the Life Cycle Thinking methodology, which includes all stages of their respective supply chains (procurement, processing, transportation, and disposal). This analysis confirmed compliance with the stated criterion "c" of the Taxonomy.



## Do No Significant Harm ("DNSH")

### *Climate change adaptation*

The Group has performed a risk assessment of the exposure of all aligned activities to acute and chronic weather events as required by Appendix "A" to the Climate Delegated Regulation based on the Company's methodology described herein.

The management has assessed the risk of exposure of the Group's assets to climate-related acute and chronic hazards, following the guidelines of Appendix A to the Climate Delegated Regulation, setting generic criteria for DNSH to climate change adaptation.

The Group has put in place management control systems and procedures to identify, evaluate and mitigate physical climate risks, which the Company defines as the risk that potential perspective changes in meteorological patterns, extreme weather phenomena and gradual changes in weather conditions and in the physical environment linked to climate change may adversely and significantly affect assets' future performance, safety of operations and future expected cash flows, so to significantly harm the objective of climate change adaptation.

The management regularly reviews the exposure of the Group's assets to the acute and chronic climate-related hazards described in the above-mentioned Appendix A and other natural hazards based on a proprietary methodology to identify physical climate risks over a long-term horizon. The purpose of this risk assessment is to define and execute mitigation plans designated to adapt the Group assets to current or expected risks, considering the already existing barriers at each Company's asset. This assessment considers various timing horizons based on assets' useful lives (about thirty years for solar installation, wind mills and biorefineries, whereas recharging points for EV have seven years of useful live).

Eni's assessment methodology of assets' exposure to natural hazards features the following steps:

- it utilizes input data furnished by an external provider, which has elaborated detailed geographic maps of prospective climate-related risks ensuring a full coverage of onshore and offshore areas where Eni's assets are located. Those climate maps combine the most updated climate forecast models, also incorporating historical weather patterns, to provide expected quantitative trends in the evolution of climate-related events (like expected number of days with temperatures above or below historical averages, wind strength, rain intensity, etcetera);
- it develops a stress test of the current asset portfolio, without

limiting to assets' residual useful lives, to evaluate the potential, perspective exposure to climate-related risks till 2050;

- it is performed yearly, and it will undergo continuous improvement based on the experience that will be accumulated over time, as well as the evolution in the framework on how to identify and measure climate-related risks;
  - it utilizes the IPCC SSP5 - 8.5 scenario to project the expected future climate-related trends and hazards in each geographical maps;
  - it utilizes the geographic coordinates of each Company's asset (longitude and latitude) to locate it in a given quadrant (each with an area of one square kilometer) as defined by the external provider to recognize the climate-related risks, which each asset is potentially exposed to over a thirty-year horizon based on the adopted climate scenario;
  - it considers in the risk-evaluating process also third-party assets and assets of the supply chain, where relevant to a full understanding of the risks which each Eni's asset is exposed to.
- Once climate-related hazards have been identified and classified, the management evaluates each asset's existing barriers or factors both physical ones (structural characteristics of an asset design, materials used in its construction, distance from the sources of possible hazards, containment walls, hydraulic barriers, etc.) and systems and procedures (early warning systems, procedures to put in safety plants and equipment, existence of monitoring and verification plans, etc.).

The outcome of that review informs the management of the residual risk and:

- in case of chronic climate-related hazards, monitoring activities are designed, planned, and carried out leading to the possible implementation and follow-up of remediation measures;
- in case of acute climate-related hazards, asset integrity process is activated which can lead to the definition and activation of an adaptation plan.

Based on the assessment of this activity's exposure to climate-related hazards following the methodology and procedures described herein, the management has concluded that the Company's assets are not exposed to any significant physical climate risk considering the facilities residual useful lives and assets features and barriers. Therefore, this activity does not significantly harm the objective of climate change adaptation.

### *Other objectives*

No violations of the DNSH principle were found in relation to the other objectives.

#### 4.1. ELECTRICITY GENERATION USING SOLAR PHOTOVOLTAIC TECHNOLOGY

##### *Substantial contribution to climate change mitigation*

The activity generates electricity using solar PV technology.

##### **Do no significant harm ("DNSH")**

##### *Climate change adaptation*

The Group has performed a risk assessment of the activity's exposure to chronic and acute climate-related hazards based on the methodology described under paragraph 3.17 and has concluded that this activity is adapted to climate change.

##### *Other objectives*

No violations of the DNSH principle were found in relation to the other objectives.

#### 4.3. ELECTRICITY GENERATION FROM WIND POWER

##### *Substantial contribution to climate change mitigation*

The activity generates electricity from wind power.

##### **Do no significant harm ("DNSH")**

##### *Climate change adaptation*

The Group has performed a risk assessment of the activity's exposure to chronic and acute climate-related hazards based on the methodology described under paragraph 3.17 and has concluded that this activity is adapted to climate change.

##### *Other objectives*

No violations of the DNSH principle were found in relation to the other objectives.

#### 4.8. ELECTRICITY GENERATION FROM BIOENERGY

##### *Substantial contribution to climate change mitigation*

Eni's activity comprises electricity generation installations each with a total rated thermal input below 2 MW, which are using gaseous biomass fuels. The installations are located in Italy.

##### **Do no significant harm ("DNSH")**

##### *Climate change adaptation*

The Group has performed a risk assessment of the activity's exposure to chronic and acute climate-related hazards based on the methodology described under paragraph 3.17 and has concluded that this activity is adapted to climate change.

##### *Other objectives*

No violations of the DNSH principle were found in relation to the other objectives.

#### 4.10 STORAGE OF ELECTRICITY

##### *Substantial contribution to climate change mitigation*

The activity consists of the construction and operation of electricity storage including pumped hydropower storage.

##### **Do no significant harm ("DNSH")**

##### *Climate change adaptation*

The Group has performed a risk assessment of the activity's exposure to chronic and acute climate-related hazards based on the methodology described under paragraph 3.17 and has concluded that this activity is adapted to climate change.

##### *Other objectives*

No violations of the DNSH principle were found in relation to the other objectives.

#### 4.13. MANUFACTURE OF BIOGAS AND BIOFUELS FOR USE IN TRANSPORT AND OF BIOLIQUIDS

The activity consists in manufacturing HVO for use in transport. The activity is performed at the biorefineries of Gela (Sicily) and Venice.

##### *Substantial contribution to climate change mitigation*

Each batch of HVO manufactured in 2024 has been reviewed to assess the substantial contribution to climate change mitigation. Volumes of HVO manufactured using food and feed crops as feedstock have been excluded from the KPI, as well as those produced using agricultural biomass that does not comply with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001.

The greenhouse gas emission savings from the HVO volumes manufactured from sustainable feedstock have been measured



by applying the GHG saving methodology and the relative fossil fuel comparator set out in Annex V to Directive (EU) 2018/2001.

The saving has been calculated for each kind of biomass used as feedstock. Based on the outcome of this review, 95% of the volumes marketed to third parties at the Gela biorefinery have been assessed to contribute substantially to climate change mitigation.

The activity turnover, OpEx, and Capex have apportioned to the relevant KPIs in proportion to the percentage of environmentally sustainable manufactured volumes of HVO.

### Do no significant harm ("DNSH")

#### *Climate change adaptation*

Based on the assessment of this activity's exposure to climate-related hazards following the methodology and procedures described herein, the management has concluded that the Company's biorefinery of Gela exposed to a risk of water stress. The water risk monitoring plan is ongoing. A monitoring plan is being implemented to check how the risk exposure evolves over time with the goal of adapting the activity to climate change within five years.

#### *Other objectives*

No violations of the DNSH principle were found in relation to the other objectives.

## 5.12. UNDERGROUND PERMANENT GEOLOGICAL STORAGE OF CO<sub>2</sub>

The activity consists in building and operating the permanent underground HyNet hub to store CO<sub>2</sub> by leveraging Eni's depleted reservoirs, off the Liverpool Bay in UK. The storage service will be made available to local businesses in hard-to-abate industries according to a regulated tariff which is currently under negotiation. Italian authorities approved a pilot project to build and operate a plant for the storage of CO<sub>2</sub> utilizing the depleted natural gas fields of Eni offshore Ravenna in the Adriatic Sea.

#### *Substantial contribution to climate change mitigation*

The UK activity complies with ISO 27914:2017 for geological storage of CO<sub>2</sub>. The Italian activity complies with provisions of Directive 2009/31/EC.

### Do no significant harm ("DNSH")

#### *Climate change adaptation*

Based on the assessment of this activity's exposure to

climate-related hazards following the methodology and procedures described herein, the management has concluded that it is adapted to climate change.

#### *Pollution prevention and control*

The management foresees that by adopting the risk management systems and the procedures of monitoring & verification provided by the above-mentioned ISO rules, the activity will comply with the pollution thresholds and markers set by Directive 2009/31/C.

#### *Sustainable use and protection of water and marine resources*

#### *Protection and restoration of biodiversity and ecosystem*

The management foresees that by adopting the risk management systems and the monitoring & verification procedures provided by the above-mentioned ISO rules and by implementing all of the planned measures to ensure the environmental sustainability of the project to be granted all necessary authorizations by the relevant UK authorities, the DNSH criteria will be met with respect to the objectives of Sustainable use and protection of water and marine resources and of Protection and restoration of biodiversity and ecosystem.

## 6.15. INFRASTRUCTURE ENABLING LOW CARBON ROAD TRANSPORT AND PUBLIC TRANSPORT

#### *Substantial contribution to climate change mitigation*

The activity consists in installing and operating a network of electric charging points for EV and it is an enabling activity.

### Do no significant harm ("DNSH")

#### *Climate change adaptation*

The activity is adapted.

#### *Pollution prevention and control*

In the installation of electric charging points, the Company limits waste generation in processes related construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials,

using available sorting systems for construction and demolition waste.

Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works, such as for example:

1. utilization of equipment with low environmental impact, which reduces noise, dust and pollutant emissions compared to traditional equipment; 2. limiting working hours by scheduling, when and where possible, construction or maintenance activities during the hours when there is less traffic to limit the impact on surrounding activities.

### Other objectives

No violations of the DNSH principle were found in relation to the other objectives.

### 1.2.2.2. CONTRIBUTION TO MULTIPLE OBJECTIVES

Not applicable.

### 1.2.2.3. DISAGGREGATION OF KPIS

In the activity 4.13 manufacture of biofuels for use in transport, the biorefinery of Gela is a common facility for both the production of Taxonomy-aligned biofuels and for Taxonomy-eligible biofuels. The facility common costs have been apportioned to each activity in proportion to the manufactured volumes of biofuels.

The management believes that such disaggregation is based on criteria that are appropriate for the production process being implemented and reflects the technical specificities of that process.

## 1.2.3. Contextual information

### 1.2.3.1. CONTEXTUAL INFORMATION ABOUT TURNOVER KPI

The amounts that sum up the numerator of the turnover KPI have derived from contracts with customers and were recognized based on IFRS 15. The total amount of the numerator was €812 million and the break-down is as follows:

- €80 million from the sale of electricity generated by the Group's PV installations;
- €159 million from the sale of electricity generated by the Group's windmills;
- €40 million from the sale of electricity generated by installations using gaseous biomass fuels;
- €230 million from the sale of plastics in primary form;
- €297 million from the sale of biofuels (HVO) in reduction of €363 million compared to 2023 due to an unfavorable scenario for biofuels.

### 1.2.3.2. CONTEXTUAL INFORMATION ABOUT CAPEX KPI

The numerator of the CapEX KPI amounted to €1,222 million and comprised:

- €529 million related to the activity of electricity generation using solar photovoltaic technology, including: (i) €405 million in asset increases for progress in the construction program, of which €314 million is related to the new installed capacity in 2024 for 408 MW and €91 million for ready-to-build plants with capacity within the 2025-2028 plan period; and (ii) €124 million in acquisitions, of which €72 million pertains to third-party facilities acquired during the fiscal year, resulting in an operational capacity of 105 MW, and €52 million for ready-to-build facilities with planned capacity in operation in the 2025-2028 timeframe;
- €48 million related to the activity of production of electricity from wind energy related to asset increases for progress in the construction program, including €7 million for new capacity installed in 2024 for 10 MW, and €41 million for ready-to-build plants within the 2025-2028 plan period;
- €300 million related to the activity of production of biofuels, relating to the increase in Property, Plant, and Equipment (PP&E), at the biorefineries in Venice and Gela, with €28 million for Venice and €72 million for Gela. Cost incurred for €153 million were capitalized as part of the conversion project of oil-based Livorno refinery into a biorefinery. Regarding Venice, various projects are underway for upgrading the biorefinery, with the main ones involving the establishment of a new section (degumming) in the biomass treatment unit to enhance the processing of more complex feedstocks; the upgrading of Ecofining and the construction of the Steam Reformer plant, which will enable the production of Biojet and increase capacity to a total of 600 kton/year. Regarding Gela, the main projects involved the upgrading of the biomass treatment unit (BTU) to enhance the processing of more complex feedstocks, the completion of which, in terms of assets, will be finalized by 2025. These biorefinery projects are part of Eni's industrial investment plan for the '25-'28 four-year period, approved by the Board of Directors on February, 2025, and they represent some of the drivers that the Group has activated to achieve the goal of reaching a capacity of over 3 million tons/year by 2028.
- €146 million relating to the activity of underground permanent storage of CO<sub>2</sub>, fully consisting of additions to intangible assets as part of an ongoing project to build and operate the HyNet and Bacton storage hub in UK and a pilot project to develop a CO<sub>2</sub> storage hub off Ravenna, Italy. Both projects have been included in the Group four-year capital budget that was approved by the Board of Directors on February, 2025. Total capital expenditures



for the HyNet project are estimated at €327 million in the four-year plan, expected in the second half of the decade when the first volume of CO<sub>2</sub> is forecast to be injected in the depleted reservoirs operated by Eni, offshore the Liverpool Bay, while the Bacton project involves a planned expenditure of €31 million, with the first CO<sub>2</sub> injection scheduled by 2030. The expected expenditures for the Italian hub amount to €34 million in the four-year plan, with expected startup by 2030 after an experimental period in the course of 2024 at industrial scale within the term of five years;

- €82 million relating to the activity of installing recharging points for EV, allocated to increases in PP&E by €79 million and intangible assets by €3 million, within the framework of the charging network expansion plan with the installation of approximately 2.3 thousand new charging stations under the Plenitude brand in 2024;
- €98 million related to storage activities, mainly for the completion of the storage project in the USA, Guajillo (199 MW).

### 1.2.3.3. CONTEXTUAL INFORMATION ABOUT THE OPEX KPI

The numerator of the OpEx KPI comprises €282 million of expenses that mainly related to maintenance and repair, and other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the Eni or third party to whom activities are outsourced that were necessary to ensure the continued and effective functioning of such assets. The breakdown related to the main activities is as follows:

- €28 million incurred in the production of electricity from photovoltaic plants, related to maintenance and other daily operating expenses (inspections, cleaning, and others);
- €46 million incurred in the production of electricity from wind plants, related to maintenance and other daily operating expenses (inspections, cleaning, and others);
- €157 million incurred in the production of biofuels, related to maintenance and other daily operating expenses (inspections, cleaning, and others).

#### *Compliance with the Minimum Safeguards (Ms) - Article 3 "c" of the EU Taxonomy Regulation*

The criteria for the eco-sustainability of economic activities outlined in article 3 of the Taxonomy Regulation call for respecting minimum safeguards when conducting business (referred to in paragraph "c"). The rule under Article 18 identifies the MS with the procedures implemented by a company to ensure that business conduct complies with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Compliance with the MS includes the principles and rights set out in the eight core conventions identified in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and in the International Bill of Human Rights.

When companies implement these procedures, they must also comply with the "do no significant harm" principle outlined in Article 2, paragraph 17 of Regulation (EU) 2019/2088, the Sustainable Finance Disclosure Regulation (SFDR). The SFDR requires financial market participants to assess the ESG risk of the investments within the financial products they intend to offer investors, measuring the ESG performance of the investee companies against a predefined set of key impact indicators in critical "principal adverse impact" areas. Five of these indicators have a social nature: (i) violations of the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises; (ii) lack of processes and compliance mechanisms to monitor compliance with the previous point's principles; (iii) unadjusted gender pay gap; (iv) Board gender diversity; and (v) exposure to controversial weapons. The definition of sustainable investment in article 2 (17) of the SFDR states that an investment is sustainable if it contributes to broadly defined environmental or social objectives, provided that it does not harm any of these objectives. Thus, Eni assumes that in complying with the SFDR principle "do no significant harm", it is understood to refer to the five social impact indicators described above, four of which are included in Eni's human rights due diligence processes. Regarding the fifth, Eni confirms that it does not have any exposure to controversial weapons.

The OECD Guidelines for Multinational Enterprises are principles for responsible business conduct related to eight business areas: (i) three relate to the issues of human rights (human rights, consumer protection, employment and industrial relations); (ii) Anti-Corruption; (iii) fair competition; (iv) taxation.

Finally, environmental protection is treated by the sustainability performance criteria set article 3 of the Taxonomy Regulation, while science/technology are out of the scope.

The ILO's eight labor conventions are comprised in the wider issue of respect for human rights.

Observance of the fundamental principles of human rights contained in the International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights and International Covenant on Economic Social and Cultural Rights) is ensured by Eni's compliance with the Italian Constitution and rules intended to implement it, which embody human rights principles. As a company incorporated in Italy, Eni is obliged to observe them.

Compliance with the safeguard clause is based on establishing and maintaining adequate company due diligence processes and company's management systems in the following areas:

- ANTI-CORRUPTION see section [■ Conduct, business culture and corruption prevention](#);
- BUSINESS TAXATION see section [■ Tax Strategy](#);
- HUMAN RIGHTS see section [■ Human rights for Eni](#);
- COMPLIANCE WITH COMPETITION LAW see the paragraph below.



### *Fair competition*

Eni has set up a controlled environment and a set of procedures and controls to minimize the risk that business and corporate activities violate the rules protecting competition in the various Countries where it operates. Among the fundamental values of the Company are the principles of fair competition – understood as a market environment that encourages companies to excel in the quality and cost effectiveness of the products and/or services sold/supplied – and compliance with antitrust legislation. Eni's control system has three phases: prevention, risk monitoring/mitigation and counteracting unlawful conduct. It is designed to minimize the risk that Eni's business units and subsidiaries engage in anti-competitive conduct, adopt practices that restrict the free market or collude with competing companies. Corporate transactions to increase market share (mergers/acquisitions) are executed after the antitrust authorities of the jurisdictions concerned have

been informed. Appropriate remediation plans are formulated in response to any comments received and in compliance with standstill obligations and the prohibition of unlawful exchange of information during the negotiation and due diligence phases. In 2024, no Group company or senior management member was party to disputes for antitrust legislation violations that resulted in a final verdict of conviction. On the reporting date, there was no significant pending antitrust disputes.

In 2024, Eni did not receive any final verdict of conviction for violations of laws, regulations or other regulatory institutions relating to human rights, bribery, competition or tax violations. The Company is cooperating actively and in good faith with the OECD National Contact Points to resolve pending Specific Instances.

In conclusion, considering the draft Report "Minimum Safeguards", Eni believes it complies with the safeguard clause of Article 3, paragraph "c" of the EU Taxonomy Regulation.



## TURNOVER KPI

| Economic activities (1) | Financial year 2024 |                       |                            | Substantial contribution criteria   |                                     |                                |                      |                    |                                  |
|-------------------------|---------------------|-----------------------|----------------------------|-------------------------------------|-------------------------------------|--------------------------------|----------------------|--------------------|----------------------------------|
|                         | Code(s) (2)         | Absolute Turnover (3) | Proportion of Turnover (4) | Climate Change Mitigation (CCM) (5) | Climate Change Adaptation (CCA) (6) | Water and marine resources (7) | Circular economy (8) | Pollution (9)      | Biodiversity and ecosystems (10) |
|                         |                     | m€                    | %                          | Y; N; N/EL (b) (c)                  | Y; N; N/EL (b) (c)                  | Y; N; N/EL (b) (c)             | Y; N; N/EL (b) (c)   | Y; N; N/EL (b) (c) | Y; N; N/EL (b) (c)               |

### A. TAXONOMY-ELIGIBLE ACTIVITIES

#### A.1. Environmentally sustainable activities (Taxonomy-aligned)

|  |                |            |             |          |      |      |      |      |      |
|--|----------------|------------|-------------|----------|------|------|------|------|------|
| Manufacture of plastics in primary form  | CCM 3.17       | 230        | 0.3%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation using solar photovoltaic technology                         | CCM 4.1        | 80         | 0.1%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation (wind)  | CCM 4.3        | 159        | 0.2%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation from bioenergy  | CCM 4.8        | 40         | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Storage of electricity   | CCM 4.10       | 1          | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Manufacture of biogas and biofuels for use in transport and of bioliquids          | CCM 4.13       | 297        | 0.3%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Anaerobic digestion of bio-waste   | CCM 5.7/CE 2.5 | 2          | 0.0%        | Y        | N/EL | N/EL | N    | N/EL | N/EL |
| Composting of bio-waste  | CCM 5.8/CE 2.5 | 2          | 0.0%        | Y        | N/EL | N/EL | N    | N/EL | N/EL |
| Transport by motorbikes, passenger cars and light commercial vehicles              | CCM 6.5        | 1          | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| <b>Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b> |                | <b>812</b> | <b>0.9%</b> | <b>%</b> |      |      |      |      |      |
| of which enabling  |                |            | 0.0%        |          |      |      |      |      |      |
| of which transitional  |                |            | 0.3%        |          |      |      |      |      |      |

#### A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned)

|   |          |              |             |          |          |          |          |          |          |
|---|----------|--------------|-------------|----------|----------|----------|----------|----------|----------|
| Recovery of bio-waste by anaerobic digestion or composting  | CE 2.5   | 4            | 0.0%        | EL       | N/EL     | N/EL     | EL       | N/EL     | N/EL     |
| Manufacture of organic basic chemicals  | CCM 3.14 | 1,341        | 1.5%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of plastics in primary form   | CCM 3.17 | 1,421        | 1.6%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Transmission and distribution of electricity  | CCM 4.9  | 4            | 0.0%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of biogas/biofuels for use in transport   | CCM 4.13 | 219          | 0.2%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| High-efficiency co-generation of heat/cool and power from fossil gaseous fuels  | CCM 4.30 | 1,571        | 1.8%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Construction, extension and operation of waste water collection and treatment   | CCM 5.3  | 20           | 0.0%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Collection and transport of non-hazardous waste in source segregated fractions  | CCM 5.5  | 1            | 0.0%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Transport by motorbikes, passenger cars and commercial vehicles   | CCM 6.5  | 24           | 0.0%        | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| <b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b> |          | <b>4,601</b> | <b>5.2%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> |
| <b>Turnover of Taxonomy eligible activities (A.1 + A.2)</b>   |          | <b>5,413</b> | <b>6.1%</b> |          |          |          |          |          |          |

### B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

|  |               |               |
|--|---------------|---------------|
| Turnover of Taxonomy-non-eligible activities (B) | 83,384        | 93.9%         |
| <b>TOTAL</b>                                     | <b>88,797</b> | <b>100.0%</b> |

| DNSH                                 |                                      |                                 |                       |                |                                  | Minimum Safeguards (17) | Proportion of Taxonomy aligned or eligible Turnover year 2023 (18) | Category (enabling activity or) (20) | Category (transitional activity) (21) |
|--------------------------------------|--------------------------------------|---------------------------------|-----------------------|----------------|----------------------------------|-------------------------|--|--------------------------------------|---------------------------------------|
| Climate Change Mitigation (CCM) (11) | Climate Change Adaptation (CCA) (12) | Water and marine resources (13) | Circular economy (14) | Pollution (15) | Biodiversity and ecosystems (16) |                         |  |                                      |                                       |
| Y/N                                  | Y/N                                  | Y/N                             | Y/N                   | Y/N            | Y/N                              | Y/N                     | %  | E                                    | T                                     |
|                                      |                                      |                                 |                       |                |                                  |                         |  |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.1%   | T                                    |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.2%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.2%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.0%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.0%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.7%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.0%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.0%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | 0.0%   |                                      |                                       |
|                                      | Y                                    | Y                               | Y                     | Y              | Y                                | Y                       | %  |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  |                         | 0.0%   | E                                    |                                       |
|                                      |                                      |                                 |                       |                |                                  |                         | 0.1%   | T                                    |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 0.0%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 1.4%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 1.7%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 0.0%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 0.1%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 2.2%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 0.0%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 0.0%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | 0.0%   |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  | Y                       | %  |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  |                         | %  |                                      |                                       |
|                                      |                                      |                                 |                       |                |                                  |                         | %  |                                      |                                       |



## CAPEX KPI

| Economic activities (1) | Financial year 2024 |                    |                         | Substantial contribution criteria   |                                     |                                |                      |                    |                                  |
|-------------------------|---------------------|--------------------|-------------------------|-------------------------------------|-------------------------------------|--------------------------------|----------------------|--------------------|----------------------------------|
|                         | Code(s) (2)         | Absolute CapEx (3) | Proportion of CapEx (4) | Climate Change Mitigation (CCM) (5) | Climate Change Adaptation (CCA) (6) | Water and marine resources (7) | Circular economy (8) | Pollution (9)      | Biodiversity and ecosystems (10) |
|                         |                     | m€                 | %                       | Y; N; N/EL (b) (c)                  | Y; N; N/EL (b) (c)                  | Y; N; N/EL (b) (c)             | Y; N; N/EL (b) (c)   | Y; N; N/EL (b) (c) | Y; N; N/EL (b) (c)               |

## A. TAXONOMY-ELIGIBLE ACTIVITIES

## A.1. Environmentally sustainable activities (Taxonomy-aligned)

|   |          |              |             |          |      |      |      |      |      |
|---|----------|--------------|-------------|----------|------|------|------|------|------|
| Manufacture of plastics in primary form   | CCM 3.17 | 4            | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation using solar photovoltaic technology                      | CCM 4.1  | 529          | 3.4%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation (wind)   | CCM 4.3  | 48           | 0.3%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation from bioenergy   | CCM 4.8  | 7            | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Storage of electricity  | CCM 4.10 | 98           | 0.6%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Manufacture of biogas and biofuels for use in transport and of bioliquids       | CCM 4.13 | 300          | 1.9%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Construction, extension and operation of waste water collection and treatment   | CCM 5.3  | 1            | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Underground permanent geological storage of CO <sub>2</sub>                     | CCM 5.12 | 146          | 0.9%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Transport by motorbikes, passenger cars and commercial vehicles                 | CCM 6.5  | 5            | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Infrastructure enabling road transport and public transport                     | CCM 6.15 | 82           | 0.5%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Installation, maintenance and repair of energy efficiency equipment             | CCM 7.3  | 2            | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| <b>CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b> |          | <b>1,222</b> | <b>7.9%</b> | <b>%</b> |      |      |      |      |      |
| of which enabling   |          |              | 0.5%        |          |      |      |      |      |      |
| of which transitional   |          |              | 0.0%        |          |      |      |      |      |      |

## A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned)

|  |          |              |              |          |          |          |          |          |          |
|--|----------|--------------|--------------|----------|----------|----------|----------|----------|----------|
| Manufacture of hydrogen  | CCM 3.10 | 1            | 0.0%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of organic basic chemicals   | CCM 3.14 | 98           | 0.6%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of plastics in primary form  | CCM 3.17 | 62           | 0.4%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Electricity generation from bioenergy  | CCM 4.8  | 3            | 0.0%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Transmission and distribution of electricity   | CCM 4.9  | 1            | 0.0%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of biogas/biofuels for use in transport  | CCM 4.13 | 69           | 0.4%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| High-efficiency co-generation of heat/cool and power from fossil gaseous fuels   | CCM 4.30 | 89           | 0.6%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Construction, extension and operation of waste water collection and treatment  | CCM 5.3  | 76           | 0.5%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Transport by motorbikes, passenger cars and commercial vehicles  | CCM 6.5  | 14           | 0.1%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Infrastructure enabling road transport and public transport  | CCM 6.15 | 4            | 0.0%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Installation, maintenance and repair of energy efficiency equipment  | CCM 7.3  | 2            | 0.0%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| <b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b> |          | <b>419</b>   | <b>2.7%</b>  | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> |
| <b>Capex of Taxonomy eligible activities (A.1 + A.2)</b>   |          | <b>1,641</b> | <b>10.6%</b> |          |          |          |          |          |          |

## B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

|   |               |               |
|---|---------------|---------------|
| Capex of Taxonomy-non-eligible activities (B) | 13,861        | 89.4%         |
| <b>TOTAL</b>                                  | <b>15,502</b> | <b>100.0%</b> |





## OPEX KPI

| Economic activities (1) | Financial year 2024 |                   |                        | Substantial contribution criteria   |                                     |                                |                      |                    |                                  |
|-------------------------|---------------------|-------------------|------------------------|-------------------------------------|-------------------------------------|--------------------------------|----------------------|--------------------|----------------------------------|
|                         | Code(s) (2)         | Absolute Opex (3) | Proportion of Opex (4) | Climate Change Mitigation (CCM) (5) | Climate Change Adaptation (CCA) (6) | Water and marine resources (7) | Circular economy (8) | Pollution (9)      | Biodiversity and ecosystems (10) |
|                         |                     | m€                | %                      | Y; N; N/EL (b) (c)                  | Y; N; N/EL (b) (c)                  | Y; N; N/EL (b) (c)             | Y; N; N/EL (b) (c)   | Y; N; N/EL (b) (c) | Y; N; N/EL (b) (c)               |

## A. TAXONOMY-ELIGIBLE ACTIVITIES

## A.1. Environmentally sustainable activities (Taxonomy-aligned)

|  |          |            |             |          |      |      |      |      |      |
|--|----------|------------|-------------|----------|------|------|------|------|------|
| Manufacture of plastics in primary form  | CCM 3.17 | 38         | 0.9%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation using solar photovoltaic technology                     | CCM 4.1  | 28         | 0.7%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation (wind)  | CCM 4.3  | 46         | 1.1%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Electricity generation from bioenergy  | CCM 4.8  | 10         | 0.2%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Storage of electricity   | CCM 4.10 | 1          | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Manufacture of biogas and biofuels for use in transport and of bioliquids      | CCM 4.13 | 157        | 3.7%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Anaerobic digestion of bio-waste   | CCM 5.7  | 1          | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| Composting of bio-waste  | CCM 5.8  | 1          | 0.0%        | Y        | N/EL | N/EL | N/EL | N/EL | N/EL |
| <b>OpEX of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b> |          | <b>282</b> | <b>6.5%</b> | <b>%</b> |      |      |      |      |      |
| of which enabling  |          |            | 0.0%        |          |      |      |      |      |      |
| of which transitional  |          |            | 0.9%        |          |      |      |      |      |      |

## A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned)

|   |          |            |              |          |          |          |          |          |          |
|---|----------|------------|--------------|----------|----------|----------|----------|----------|----------|
| Manufacture of other low carbon technologies  | CCM 3.6  | 8          | 0.2%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of organic basic chemicals  | CCM 3.14 | 55         | 1.3%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of plastics in primary form   | CCM 3.17 | 94         | 2.2%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Transmission and distribution of electricity  | CCM 4.9  | 3          | 0.1%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Manufacture of biogas/biofuels for use in transport   | CCM 4.13 | 19         | 0.4%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Cogeneration of heat/cool and power from bioenergy  | CCM 4.20 | 9          | 0.2%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| High-efficiency co-generation of heat/cool and power from fossil gaseous fuels  | CCM 4.30 | 51         | 1.2%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Construction, extension and operation of waste water collection and treatment   | CCM 5.3  | 145        | 3.4%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Collection and transport of non-hazardous waste in source segregated fractions  | CCM 5.5  | 10         | 0.2%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Underground permanent geological storage of CO <sub>2</sub>   | CCM 5.12 | 4          | 0.1%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| Transport by motorbikes, passenger cars and commercial vehicles   | CCM 6.5  | 5          | 0.1%         | EL       | N/EL     | N/EL     | N/EL     | N/EL     | N/EL     |
| <b>OpEX of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b> |          | <b>403</b> | <b>9.4%</b>  | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> | <b>%</b> |
| <b>OpEX of Taxonomy eligible activities (A.1+A.2)</b>   |          | <b>685</b> | <b>15.9%</b> |          |          |          |          |          |          |

## B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

|  |              |               |
|--|--------------|---------------|
| OpEX of Taxonomy-non-eligible activities (B) | 3,624        | 84.1%         |
| <b>Total</b>                                 | <b>4,309</b> | <b>100.0%</b> |





## Template 1: Nuclear and fossil gas related activities, 2024

| Row                                  | Nuclear energy related activities  | 2024 |
|--------------------------------------|--|------|
| 1                                    | The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.  | No   |
| 2                                    | The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | No   |
| 3                                    | The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.                          | No   |
| <b>Fossil gas related activities</b> |  |      |
| 4                                    | The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.   | No   |
| 5                                    | The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.  | Yes  |
| 6                                    | The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.  | No   |

## Template 2: Taxonomy-aligned economic activities (denominator), 2024

€ million, except where indicated

| Row | Economic activities  | Turnover      |             |                                 |             | Capex                           |           |               |             | Opex                            |             |                                 |           |
|-----|--|---------------|-------------|---------------------------------|-------------|---------------------------------|-----------|---------------|-------------|---------------------------------|-------------|---------------------------------|-----------|
|     |  | CCM + CCA     |             | Climate change mitigation (CCM) |             | Climate change adaptation (CCA) |           | CCM + CCA     |             | Climate change mitigation (CCM) |             | Climate change adaptation (CCA) |           |
|     |  | Amount        | %           | Amount                          | %           | Amount                          | %         | Amount        | %           | Amount                          | %           | Amount                          | %         |
| 1   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |                                 |             |                                 |           |               |             |                                 |             |                                 |           |
| 2   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |                                 |             |                                 |           |               |             |                                 |             |                                 |           |
| 3   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |                                 |             |                                 |           |               |             |                                 |             |                                 |           |
| 4   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |                                 |             |                                 |           |               |             |                                 |             |                                 |           |
| 5   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0             | 0%          | 0                               | 0%          | 0                               | 0%        | 0             | 0%          | 0                               | 0%          | 0                               | 0%        |
| 6   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |                                 |             |                                 |           |               |             |                                 |             |                                 |           |
| 7   | <b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                               | <b>812</b>    | <b>0.9%</b> | <b>812</b>                      | <b>0.9%</b> | <b>0</b>                        | <b>0%</b> | <b>1,222</b>  | <b>7.9%</b> | <b>1,222</b>                    | <b>7.9%</b> | <b>0</b>                        | <b>0%</b> |
| 8   | <b>Total applicable KPI</b>  | <b>88,797</b> | <b>100%</b> | <b>88,797</b>                   | <b>100%</b> | <b>0</b>                        | <b>0%</b> | <b>15,502</b> | <b>100%</b> | <b>15,502</b>                   | <b>100%</b> | <b>0</b>                        | <b>0%</b> |



## Template 3: Taxonomy-aligned economic activities (numerator), 2024

€ million, except where indicated

| Row | Economic activities  | Turnover   |               |                                 |               |                                 |           | Capex        |               |                                 |               |                                 |           | Opex       |               |                                 |               |                                 |           |
|-----|--|------------|---------------|---------------------------------|---------------|---------------------------------|-----------|--------------|---------------|---------------------------------|---------------|---------------------------------|-----------|------------|---------------|---------------------------------|---------------|---------------------------------|-----------|
|     |  | CCM + CCA  |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |           | CCM+CCA      |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |           | CCM+CCA    |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |           |
|     |  | Amount     | %             | Amount                          | %             | Amount                          | %         | Amount       | %             | Amount                          | %             | Amount                          | %         | Amount     | %             | Amount                          | %             | Amount                          | %         |
| 1   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI |            |               |                                 |               |                                 |           |              |               |                                 |               |                                 |           |            |               |                                 |               |                                 |           |
| 2   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI |            |               |                                 |               |                                 |           |              |               |                                 |               |                                 |           |            |               |                                 |               |                                 |           |
| 3   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI |            |               |                                 |               |                                 |           |              |               |                                 |               |                                 |           |            |               |                                 |               |                                 |           |
| 4   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI |            |               |                                 |               |                                 |           |              |               |                                 |               |                                 |           |            |               |                                 |               |                                 |           |
| 5   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0          | 0%            | 0                               | 0%            | 0                               | 0%        | 0            | 0%            | 0                               | 0%            | 0                               | 0%        | 0          | 0%            | 0                               | 0%            | 0                               | 0%        |
| 6   | Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI |            |               |                                 |               |                                 |           |              |               |                                 |               |                                 |           |            |               |                                 |               |                                 |           |
| 7   | <b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>                               | <b>812</b> | <b>100.0%</b> | <b>812</b>                      | <b>100.0%</b> | <b>0</b>                        | <b>0%</b> | <b>1,222</b> | <b>100.0%</b> | <b>1,222</b>                    | <b>100.0%</b> | <b>0</b>                        | <b>0%</b> | <b>282</b> | <b>100.0%</b> | <b>282</b>                      | <b>100.0%</b> | <b>0</b>                        | <b>0%</b> |
| 8   | <b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>  | <b>812</b> | <b>100.0%</b> | <b>812</b>                      | <b>100.0%</b> | <b>0</b>                        | <b>0%</b> | <b>1,222</b> | <b>100.0%</b> | <b>1,222</b>                    | <b>100.0%</b> | <b>0</b>                        | <b>0%</b> | <b>282</b> | <b>100.0%</b> | <b>282</b>                      | <b>100.0%</b> | <b>0</b>                        | <b>0%</b> |



## Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities, 2024

€ million, except where indicated

| Row | Economic activities  | Turnover     |              |                                 |              |                                 |           | Capex      |              |                                 |              |                                 |           | Opex       |              |                                 |              |                                 |           |
|-----|--|--------------|--------------|---------------------------------|--------------|---------------------------------|-----------|------------|--------------|---------------------------------|--------------|---------------------------------|-----------|------------|--------------|---------------------------------|--------------|---------------------------------|-----------|
|     |  | CCM + CCA    |              | Climate change mitigation (CCM) |              | Climate change adaptation (CCA) |           | CCM+CCA    |              | Climate change mitigation (CCM) |              | Climate change adaptation (CCA) |           | CCM+CCA    |              | Climate change mitigation (CCM) |              | Climate change adaptation (CCA) |           |
|     |  | Amount       | %            | Amount                          | %            | Amount                          | %         | Amount     | %            | Amount                          | %            | Amount                          | %         | Amount     | %            | Amount                          | %            | Amount                          | %         |
| 1   | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |              |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |
| 2   | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |              |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |
| 3   | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |              |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |
| 4   | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |              |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |
| 5   | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 1,571        | 34.1%        | 1,571                           | 34.1%        | 0                               | 0%        | 89         | 21.2%        | 89                              | 21.2%        | 0                               | 0%        | 51         | 12.7%        | 51                              | 12.7%        | 0                               | 0%        |
| 6   | Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |              |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |            |              |                                 |              |                                 |           |
| 7   | <b>Amount and proportion of other taxonomy eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>                               | <b>3,030</b> | <b>59.1%</b> | <b>3,030</b>                    | <b>59.1%</b> | <b>0</b>                        | <b>0%</b> | <b>330</b> | <b>72.8%</b> | <b>330</b>                      | <b>72.8%</b> | <b>0</b>                        | <b>0%</b> | <b>352</b> | <b>87.5%</b> | <b>352</b>                      | <b>87.5%</b> | <b>0</b>                        | <b>0%</b> |
| 8   | <b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>  | <b>4,601</b> | <b>100%</b>  | <b>4,601</b>                    | <b>100%</b>  | <b>0</b>                        | <b>0%</b> | <b>419</b> | <b>100%</b>  | <b>419</b>                      | <b>100%</b>  | <b>0</b>                        | <b>0%</b> | <b>403</b> | <b>100%</b>  | <b>403</b>                      | <b>100%</b>  | <b>0</b>                        | <b>0%</b> |



## Template 5: Taxonomy non-eligible economic activities, 2024

€ million, except where indicated

| Row | Economic activities  | Turnover      |             | Capex         |             | Opex         |             |
|-----|--|---------------|-------------|---------------|-------------|--------------|-------------|
|     |  | Amount        | %           | Amount        | %           | Amount       | %           |
| 1   | Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |               |             |              |             |
| 2   | Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |               |             |              |             |
| 3   | Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |               |             |              |             |
| 4   | Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |               |             |              |             |
| 5   | Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0             | 0%          | 0             | 0%          | 0            | 0%          |
| 6   | Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI |               |             |               |             |              |             |
| 7   | <b>Amount and proportion of other taxonomy non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>  | <b>83,384</b> | <b>100%</b> | <b>13,861</b> | <b>100%</b> | <b>3,624</b> | <b>100%</b> |
| 8   | <b>Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>   | <b>83,384</b> | <b>100%</b> | <b>13,861</b> | <b>100%</b> | <b>3,624</b> | <b>100%</b> |



## MAIN DEFINITIONS

### General

- **Inherent risk:** inherent risk in the absence of managerial actions to manage it.
- **Residual risk:** risk that remains after taking reduction actions.
- **Target:** in general terms, a target is a specific and measurable result, generally defined in the strategic plan, with specific deadlines, a reference year, key performance indicators used to assess progress, which support the achievement of objectives in line with the company's policies. Eni identifies specific targets in its corporate strategies (business, sustainability and decarbonization).

### Climate change

- **Climate** is the statistical description in terms of average and variability of the relevant meteorological quantities (e.g. temperature, precipitation, winds, etc.), calculated over a period of at least 30 years.
- **Climate change:** a change in the state of the climate that persists for an extended period, typically decades or longer, and that can be detected (e.g. using statistical tests) by changes in the mean and/or variability of its features. Climate change can originate from internal natural processes or from external forcings, such as modulations of solar cycles, volcanic eruptions and persistent anthropogenic changes in the composition of the atmosphere or land use (source: IPCC glossary).
- **Energy transition:** it is the transition from the use of energy sources with a high carbon footprint to low-emission energy sources, and is part of the broader transition to sustainable economies through the use of renewable energy and nuclear energy, the adoption of energy saving and sustainable development techniques (Carbon neutrality toolkit, UNECE).
- **Transition risks:** the risks arising from the misalignment between the strategy and management of an organization or investor and the evolution of the regulatory, political or social landscape in which they operate. Developments aimed at halting or reversing damage to the climate or nature such as government measures, technological progress, market changes, litigation and changing consumer preferences can all create or affect transition risks (source: ESRS).
- **Physical Risks (Acute and Chronic):** risk from climate change that can be determined by events (acute risks) or longer-term changes in climate patterns (chronic risks). Acute physical hazards arise from specific hazards, especially weather events such as storms, floods, fires or heat waves. Chronic physical risks result from longer-term climate change, such as temperature changes and their effects on sea level rise, lower water availability, biodiversity loss, and changes in land and soil productivity (source: ESRS).
- **Climate change mitigation/decarbonization:** actions or activities that limit GHG emissions (e.g. due to production, energy use or land use change) and/or reduce their concentration in the atmosphere (e.g. carbon absorption through land use or other mechanisms).
- **Adaptation to climate change:** is the adjustment of ecological, social or economic systems in response to actual or expected climate impacts. It involves adjustments to reduce the vulnerability of communities, regions or activities to climate change.
- **Decarbonization Plan (Eni):** the element of the company's strategic plan that defines its objectives, actions and resources with a view to transitioning to a lower-carbon economy, including actions such as reducing GHG emissions in order to limit global warming to 1.5°C and achieve climate neutrality. Eni's decarbonization plan differs from the definition of the CRSD transition plan (ESRS E1-1) because it is built on the equity boundary, in continuity with previous years. By comparison, the entity-specific boundary used by Eni covers 97% of the CSRD boundary.
- **Mitigation hierarchy:** The mitigation hierarchy is an international best practice, for the management of risks and potential impacts on the environment, through a sequence of actions: i) preventing and avoiding impacts; (ii) minimising impact where it cannot be avoided; (iii) restore and (iv) compensate.
- **Actual GHG emissions (Eni):** emissions emitted in the past or present and accounted for in the emission inventory.
- **Potential GHG emissions (Eni):** possible future emissions quantified on the basis of its Strategic Plan.
- **Residual emissions:** GHG emissions that remain after all possible actions have been taken to reduce them (source: ISO Net Zero Guidelines).
- **Carbon Neutrality:** a condition in which the anthropogenic emissions of carbon dioxide (CO<sub>2</sub>) associated with a given entity are balanced through CO<sub>2</sub> removals. Carbon neutrality is often assessed over the entire life cycle, including indirect emissions (Scope 3), but it can also be limited to emissions and removals, over a specific period of time, over a given period of time, for which the entity has direct control, as established by the relevant reference scheme (source: IPCC glossary).
- **Path towards Carbon Neutrality (Eni):** a pillar of the business model that is based on an industrial transformation plan that involves the use of available and economically sustainable technological solutions capable of contributing immediately to the reduction of emissions generated throughout the entire life cycle of energy products until their net zero by 2050.
- **Net zero:** on a global scale, the terms carbon neutrality and net zero CO<sub>2</sub> emissions are equivalent. On a sub-global scale, the term net zero CO<sub>2</sub> is generally applied to emissions and removals under the direct control or territorial responsibility of the reporting entity, while

carbon neutrality generally also includes emissions and removals that go beyond the direct control or territorial responsibility of the entity itself (source: IPCC glossary).

- **Net zero targets (Eni):** series of targets aimed at reducing emissions. In the short to medium term, Eni prioritizes the reduction of Scope 1 and Scope 2 emissions, focusing on the Upstream sector, with the goal of "Net Zero Carbon Footprint Upstream" by 2030. Thereafter, Eni plans to achieve "Net Zero Carbon Footprint Eni" of Scope 1 and Scope 2 emissions for the entire Group by 2035. In addition, the company is taking steps to reduce Scope 3 emissions related to the carbon intensity of its products and services, thus contributing to the overall decarbonization of the energy system with the goal of "Net zero" (for GHG Lifecycle Emissions and for Carbon Intensity) by 2050.
- **Soft and Hard Law:** "Soft law" refers to all those phenomena of self-regulation different from traditional regulatory instruments that are the result of a formal process of legislative production by bodies invested with the relevant function, so-called. "hard law", and whose essential characteristic is given by the fact that they have no direct binding effect.
- **Lower carbon (Eni) solutions/products:** represent a diversified portfolio that aims to contribute to the decarbonization of the energy system. This portfolio includes innovations in renewable energy sources, sustainable biofuels, advanced CO<sub>2</sub> capture and storage (CCS) technologies, hydrogen production and nuclear energy.
- **Hard-to-abate:** refers to those industrial and heavy transport sectors with high CO<sub>2</sub> emissions that are particularly complex to decarbonise due to technological, physical and market factors (source: Irena).
- **Carbon dioxide Capture, Utilization and Storage (CCUS):** involves capturing CO<sub>2</sub>, typically from large emission sources such as power plants or industrial plants that use fossil fuels or biomass as fuel. If not used on-site, the captured carbon dioxide is compressed and transported via pipelines, ship, rail, or truck to be used in a range of applications, or injected into confined geological formations such as depleted oil and gas fields or salt aquifers.
- **Natural Climate Solutions (NCS):** Nature-based solutions for climate change. They are based on nature's ability to remove and store carbon from the atmosphere. Among other benefits, they help protect endangered habitats and promote biodiversity, as well as support sustainable development for local communities.
- **Climate emission scenarios:** a plausible representation of the future evolution of emissions of substances that are radiatively active (e.g. greenhouse gases – GHGs – and aerosols) based on a coherent and internally consistent set of assumptions about the driving forces (such as demographic and socio-economic

development, technological change, energy and land use) and their key relationships. Concentration scenarios, derived from emission scenarios, are often used as input for a climate model to calculate climate projections (source: IPCC9).

- **Energy scenarios:** provide a framework for exploring future energy prospects, including the various combinations of technology options and their implications. Many scenarios in the literature illustrate how developments in the energy system will affect the dynamics of different industrial sectors globally. Among the most recognized energy scenarios are those of the International Energy Agency (IEA), which annually publishes a series of scenarios in the World Energy Outlook (WEO), based on detailed energy demand forecasts by sector, built on specific demographic and economic variables of the coming decades, according to two reference logics.
  - Forecasting, which produce trajectories for the evolution of energy consumption using demographic/economic inputs and existing or likely future policies/declared ambitions (STEPS - Stated Policies Scenario and APS - Announced Pledges Scenario);
  - Backcasting, which identify backwards trajectories compatible with one or more objectives imposed through the use of technologies even in the demonstration phase, the hypothesis of a sudden change in consumer habits and an acceleration of the efficiency of final consumption (NZE – Net Zero Emissions scenario).

## Environment

- **Environmental Golden Rules:** guidelines that aim to protect and conserve the environment by directing the behavior of people and companies towards sustainable and environmentally friendly practices (e.g. through the reduction/reuse and recycling of waste, energy saving, protection of bio).
- **Water stress areas:** areas with a baseline value of "water stress" >40%; water stress is calculated as the ratio of water withdrawn to recharge capacity in a given basin.
- **HVO:** Hydrotreated Vegetable Oil, a diesel biofuel produced mainly from waste raw materials, vegetable residues and a residual part of vegetable oils.
- **Oil spill:** spill from primary or secondary containment into the environment of oil or petroleum derivatives from refining or petroleum waste occurring during operational activity or as a result of acts of sabotage, theft and vandalism. It should be noted that the events reported in this document are only those that have resulted in spills greater than 1 barrel.
- **Mitigation hierarchy:** the mitigation hierarchy is an international best practice, for the management of risks and potential impacts on the environment, through a sequence of actions: (i) preventing and avoiding impacts; (ii) minimising impact where it cannot be avoided; (iii) restore and (iv) compensate.



## Social

- **Stop work authority:** principle aimed at promoting virtuous and conscious behavior that guarantees the protection of all workers for which every collaborator, in any site, has the authority to stop an activity when he detects dangerous behavior or condition.
- **Asset integrity:** the ability of an asset to function effectively and accurately, while safeguarding the well-being of personnel and equipment throughout the asset's lifecycle, from its design phase to its decommissioning.
- **Human Rights Defender:** a person who, individually or with others, acts peacefully to promote or protect human rights on behalf of individuals or groups.
- **Environmental Social and Health Impact Assessment (ESHIA):** environmental, social and health impact assessment studies implemented before starting any type of operational project.
- **Health Impact Assessment (HIA):** structured process to assess potential health implications within policy proposals, programmes or projects, identifying potentially adverse effects. It suggests ways to minimize them, maximizing health benefits, and can be applied to a wide range of industries by influencing decisions at various levels of planning.
- **"Human Rights Impact Assessment" (HRIA) or "Human Rights Risk Analysis" (HRRRA):** methodologies aimed at identifying, analyzing, evaluating and managing the negative effects that the implementation of an industrial project or other business activities may have on the enjoyment of the human rights of certain types of stakeholders (so-called rights-holders), such as workers and community members.
- **Environmental and Social Management Plan:** action plans relating to the mitigation and control actions envisaged by the ESHIA on environmental and social issues.
- **Project Affected People:** these are the individual owners of land or onshore activities (farmers, managers of tourism or entrepreneurial activities) and offshore (fishermen) who suffer economic or physical displacement due to an Eni project.
- **Salient Human Rights Issue:** the set of issues considered most significant, on which the management model and activities to respect for human rights are concentrated, divided into the following clusters: (i) workers' rights (direct and value chain); (ii) community rights (including security); (iii) Customer Rights.
- **Whistleblowing Reports:** any Communication received by Eni concerning conduct – referable to Eni's People or to all those who operate or have operated in Italy and abroad in the name of or on behalf of or in the interest of Eni – that is in violation of laws and regulations, provisions of the Authorities, Code of Ethics, Model 231 or Compliance Models for foreign subsidiaries and internal regulations, in compliance with the locally applicable implementing legislation of Directive (EU) 2019/1937.
- **Grievance:** a complaint or complaint raised by an individual or group of individuals arising from actual or perceived impacts caused by the organization's operational activities.
- **B2C:** Business to Consumer refers to all business relationships between the company and the end customer who purchase gas, electricity or other products and services provided by Plenitude for personal or domestic, business or commercial use.



# Content index

| Disclosure Requirement and related datapoint   | Other EU Regulations  | Not material <sup>(*)</sup> /Phase-in | Cross reference to the Annual Report 2024   | 2024 Sustainability Statement  |
|--|---|---------------------------------------|---|--|
| <b>ESRS 2 - GENERAL DISCLOSURES</b>  |   |                                       |   |  |
| ESRS 2 BP-1 General basis for preparation of the sustainability statement  |   |                                       |   | General Information: Basis for preparation Reporting principles and criteria: Introduction, Reporting boundary and Basis for preparation   |
| ESRS 2 BP-2 Disclosures in relation to specific circumstances  |   |                                       |   | General Information: Basis for preparation Reporting principles and criteria: Introduction and Content index   |
| ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies   | a) Sustainable Finance Disclosure Regulation;<br>b) Benchmark Regulation  |                                       | Governance Integrated Risk Management   | Business conduct: Actions taken on material IROs, Training and communication activities  |
| ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies |   |                                       | Governance: The Internal Control System on sustainability reporting   | General Information: Process and results of the double materiality assessment  |
| ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes  |   |                                       | Governance: The Remuneration Policy of the Corporate Bodies   | Climate change: Policies and Climate Governance  |
| ESRS 2 GOV-4 Statement on due diligence  | Par. 30 - Sustainable Finance Disclosure Regulation   |                                       | Governance  | General Information: Statement on due diligence  |
| ESRS 2 GOV-5 Risk management and internal controls over sustainability reporting   |   |                                       | Governance: The Internal Control and Risk Management System   |  |
| ESRS 2 SBM-1 – Strategy, Business Model and Value Chain  | Par. 40 (d) i – Sustainable Finance Disclosure Regulation; Pillar 3; Benchmark Regulation<br>Par. 40 (d) ii, iii – Sustainable Finance Disclosure Regulation; Benchmark Regulation<br>Par. 40 (d) iv – Benchmark Regulation |                                       | Activities Business model Operating review Financial review and other information: Revenues and Results by business segments Strategy | General Information: Process and results of the double materiality assessment, value chain and Main Impacts Material impacts, risks and opportunities (IROs) sections in the chapters Clients and consumers and Business conduct |
| ESRS 2 SBM-2 – Interests and views of stakeholders   |   |                                       | Business model  | General Information: Stakeholder engagement  |
| ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model                                  |   |                                       | Business model  | General Information: Process and results of the double materiality assessment Material impacts, risks and opportunities (IROs) sections across the different thematic chapters   |
| ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities   |   |                                       |   | General Information: Process and results of the double materiality assessment and The resilience of the strategy to material IROs  |
| ESRS 2 IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement   |   |                                       |   | General Information: Basis for preparation Reporting principles and criteria: Content index  |
| ESRS 2 MDR-P Policies adopted to manage material sustainability matters  |   |                                       |   | Policies sections across all the thematic chapters Reporting principles and criteria: Policies   |

(\*) The indication "Not material" is specified only for those KPIs that refer to other European regulations.



| Disclosure Requirement and related datapoint   | Other EU Regulations  | Not material <sup>(*)</sup> /<br>Phase-in                         | Cross reference to the Annual Report 2024                    | 2024 Sustainability Statement   |
|--|---|---|--|---|
| ESRS 2 Actions MDR-A Actions and resources in relation to material sustainability matters                                  |   |   |  | Actions taken on material IROs sections across all the thematic chapters<br>Climate change: Decarbonization plan  |
| ESRS 2 Metrics MDR-M Metrics in relation to material sustainability matters  |   |   |  | Metrics sections across all the thematic chapters<br>Reporting principles and criteria: Metrics: methodologies  |
| ESRS 2 Targets MDR-T Tracking effectiveness of policies and actions through targets  |   |   |  | Targets and commitments sections across all the thematic chapters<br>Climate change: Decarbonization strategy, Main GHG emission reduction targets  |
| <b>ESRS E1 CLIMATE CHANGE</b>  |   |   |  |   |
| ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes  |   |   |  | Climate change: Policies and Climate Governance   |
| ESRS E1-1 Transition plan for climate change mitigation  | Par. 14 – EU climate law Par. 16 (g) – Pillar 3; Benchmark Regulation               |   |  | Climate change: Decarbonization plan<br>Climate change: GHG metrics<br>EU Taxonomy and EU Taxonomy Annex  |
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model              |   | PHASE-IN only for paragraph 48(e) (anticipated financial effects) |  | Climate change: Climate risks and opportunities for the company (outside-in view)   |
| ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities |   |   | Risk factors and uncertainties<br>Integrated Risk Management | Climate change: Impacts, risks and opportunities related to climate change<br>EU Taxonomy and EU Taxonomy Annex   |
| E1-2 Policies related to climate change mitigation and adaptation  |   |   |  | Climate change: Policies and Climate Governance<br>Reporting principles and criteria: Policies  |
| E1-3 Actions and resources in relation to climate change policies  |   |   |  | Climate change: Decarbonization plan  |
| E1-4 Targets related to climate change mitigation and adaptation   |   |   |  | Climate change: Decarbonization strategy, Main GHG emission reduction targets, Targets for the reduction of methane emissions and flaring in the Upstream business (operated and cooperated assets) |
| ESRS E1-4 GHG emission reduction targets, paragraph 34   | Par. 34 – Sustainable Finance Disclosure Regulation; Pillar 3; Benchmark Regulation |   |  | Climate change: Decarbonization strategy, Main GHG emission reduction targets, Targets for the reduction of methane emissions and flaring in the Upstream business (operated and cooperated assets) |
| E1-5 Energy consumption and mix  |   |   |  | Climate change: Metrics, Energy consumption and energy mix<br>Reporting principles and criteria: Metrics: methodologies   |
| ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38 | Par. 38 – Sustainable Finance Disclosure Regulation                                 |   |  | Climate change: Metrics, Energy consumption and energy mix<br>Reporting principles and criteria: Metrics: methodologies   |
| ESRS E1-5 Energy consumption and mix, paragraph 37   | Par. 37 – Sustainable Finance Disclosure Regulation                                 |   |  | Climate change: Metrics, Energy consumption and energy mix<br>Reporting principles and criteria: Metrics: methodologies   |



| Disclosure Requirement and related datapoint  | Other EU Regulations   | Not material <sup>(*)</sup> / Phase-in  | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement  |
|---|--|---|---|--|
| ESRS E1-5<br>Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43                      | Par. da 40 a 43 – Sustainable Finance Disclosure Regulation                                    | NOT MATERIAL - The intensity indicators, and especially their trends, based on revenues are not representative for the sector as revenues are strictly dependent on the commodities prices. |   |  |
| <b>E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions</b>  |  |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44   | Par. 44 – Sustainable Finance Disclosure Regulation; Pillar 3; Benchmark Regulation            |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55  | Par. from 53 to 55 – Sustainable Finance Disclosure Regulation; Pillar 3; Benchmark Regulation | NOT MATERIAL - The intensity indicators, and especially their trends, based on revenues are not representative for the sector as revenues are strictly dependent on the commodities prices. |   |  |
| <b>E1-7 GHG removals and GHG mitigation projects financed through carbon credits</b>  |  |   | Operating review: CCS and Agri            | Climate change: Decarbonization plan, Offsets and removals of GHG emissions<br>Reporting principles and criteria: Metrics: methodologies                                   |
| ESRS E1-7 GHG removals and carbon credits, paragraph 56   | Para. 56 – EU Climate Law  |   |   | Climate change: Decarbonization plan and Offsets and removals of GHG emissions<br>Reporting principles and criteria: Metrics: methodologies                                |
| <b>E1-8 Internal carbon pricing</b>   |  |   |   | Climate change: Climate risks and opportunities for the company (outside-in view) and Internal carbon pricing<br>Reporting principles and criteria: Metrics: methodologies |
| <b>E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities</b> |  | PHASE-IN  |   |  |
| ESRS E1-9<br>Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66                                  | Par. 66 – Benchmark Regulation   | PHASE-IN  |   |  |
| ESRS E1-9<br>Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66, letter a)                       | Par. 66 (a) – Pillar 3<br>Par. 66 (c) – Pillar 3   | PHASE-IN  |   |  |
| ESRS E1-9<br>Location of significant assets at material physical risk, paragraph 66, letter c)                                    |  |   |   |  |
| ESRS E1-9<br>Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67, letter c)      | Par. 67 (c) – Pillar 3   | PHASE-IN  |   |  |
| Degree of exposure of the portfolio to climate-related opportunities, paragraph 69  | Par. 69 – Benchmark Regulation   | PHASE-IN  |   |  |



| Disclosure Requirement and related datapoint  | Other EU Regulations | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement   |
|---|----------------------|---|---|---|
| <b>ENTITY SPECIFIC (ES) E1</b>  |                      |   |   |   |
| ES E1-1 Scope 1 GHG emissions of which:<br>- CO <sub>2</sub> equivalent from combustion and process<br>- CO <sub>2</sub> equivalent from flaring<br>- CO <sub>2</sub> equivalent from venting<br>- CO <sub>2</sub> equivalent from methane fugitive emissions |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-2<br>- Net Carbon Footprint upstream (Scope 1+2)<br>- Net Carbon Footprint Eni (Scope1+2)   |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-3<br>Net GHG Lifecycle Emissions (Scope 1+2+3)  |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-4<br>Net Carbon Intensity (Scope 1+2+3)   |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-5<br>Renewable Installed capacity   |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-6<br>Capacity of biorefineries  |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-7<br>- Eni direct methane emissions (Scope 1)<br>- of which: fugitive upstream  |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-8<br>Upstream methane emission intensity  |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-9<br>- Volume of hydrocarbons sent to flaring<br>- of which: routine Upstream   |                      |   |   | Climate change: GHG metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E1-10<br>Sold production of biofuels   |                      |   |   | Climate change: GHG metrics<br>Energy consumption and energy mix<br>Reporting principles and criteria: Metrics: methodologies                             |
| ES E1-11<br>-R&D expenditures<br>-of which: related to decarbonization  |                      |   |   | Climate change: GHG metrics<br>Energy consumption and energy mix<br>Reporting principles and criteria: Metrics: methodologies                             |
| ES E1-12<br>- Patent application first filings<br>- of which: related to renewable energy sources   |                      |   |   | Climate change: Decarbonization plan, Locked-in Emissions Assessment, Patents and innovation<br>Reporting principles and criteria: Metrics: methodologies |
| <b>ESRS E2 POLLUTION</b>  |                      |   |   |   |
| ESRS 2 IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities  |                      |   | Risk factors and uncertainties            | Environment and Eni's management system<br>Pollution: Material impacts, risks and opportunities (IROs)  |
| E2-1 Policies related to pollution  |                      |   |   | Environment and Eni's management system<br>Pollution: Policies<br>Reporting principles and criteria: Policies   |
| E2-2 Actions and resources related to pollution   |                      |   |   | Pollution: Actions taken on material IROs   |
| E2-3 Targets related to pollution   |                      |   |   | Pollution: Targets and commitments  |



| Disclosure Requirement and related datapoint  | Other EU Regulations                                | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement  |
|---|---|---|---|--|
| <b>E2-4 Pollution of air, water and soil</b>  |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ESRS E2-4<br>Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28 | Par. 28 – Sustainable Finance Disclosure Regulation |   |   | Pollution: Metrics, Other pollutants listed in Regulation 166/2006 (E-PRTR)<br>Reporting principles and criteria: Metrics: methodologies |
| <b>E2-6 Anticipated financial effects from material pollution-related risks and opportunities</b>   |   | PHASE-IN                                  |   |  |
| <b>ENTITY SPECIFIC (ES) E2</b>  |   |   |   |  |
| ES E2-1<br>- Operating oil spill (>1 barrel)<br>- of which: upstream  |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E2-2<br>- Operating oil spill volumes (>1 barrel)<br>- of which: upstream  |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E2-3<br>- Oil spill from sabotage (including theft) (>1 barrel)<br>- of which: upstream  |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E2-4<br>- Volumes of oil spill from sabotage (including theft) (>1 barrel)<br>- of which: upstream   |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E2-5<br>Oil spill volumes from sabotage (including theft) in Nigeria (>1 barrel)   |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E2-6<br>Chemical spill   |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES E2-7<br>Chemical spill volumes   |   |   |   | Pollution: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| <b>ESRS E3 WATER AND MARINE RESOURCES</b>   |   |   |   |  |
| <b>ESRS 2 IRO-1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities</b>                              |   |   |   | Environment and Eni's management system<br>Water resources: Actions taken on material IROs   |
| <b>E3-1 Policies related to water and marine resources</b>  |   |   |   | Pollution: Policies<br>Water resources: Policies<br>Reporting principles and criteria: Policies  |
| ESRS E3-1<br>Water and marine resources, paragraph 9  | Par. 9 – Sustainable Finance Disclosure Regulation  |   |   | Pollution: Policies<br>Water resources: Policies<br>Reporting principles and criteria: Policies  |
| ESRS E3-1<br>Dedicated policy, paragraph 13   | Par. 13 – Sustainable Finance Disclosure Regulation | NOT APPLICABLE – Policies cover all sites |   |  |
| ESRS E3-1<br>Sustainable oceans and seas, paragraph 14  | Par. 14 – Sustainable Finance Disclosure Regulation | NOT MATERIAL                              |   |  |
| <b>E3-2 Actions and resources related to water and marine resources</b>   |   |   |   | Water resources: Actions taken on material IROs  |
| <b>E3-3 Targets related to water and marine resources</b>   |   |   |   | Water resources: Targets and commitments   |



| Disclosure Requirement and related datapoint   | Other EU Regulations                                      | Not material <sup>(*)</sup> / Phase-in  | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement  |
|--|---|---|---|--|
| <b>E3-4 Water consumption</b>  |   |   |   | Water resources: Metrics<br>Reporting principles and criteria: Metrics: methodologies                      |
| ESRS E3-4 Total water recycled and reused, paragraph 28, letter c)   | Par. 28 (c) – Sustainable Finance Disclosure Regulation   |   |   | Water resources: Metrics<br>Reporting principles and criteria: Metrics: methodologies                      |
| ESRS E3-4<br>Total water consumption in m <sup>3</sup> per net revenue on own operations, paragraph 29   | Par. 29 – Sustainable Finance Disclosure Regulation       | NOT MATERIAL - The intensity indicators, and especially their trends, based on revenues are not representative for the sector as revenues are strictly dependent on the commodities prices. |   |  |
| <b>E3-5 Anticipated financial effects from material water and marine resources-related risks and opportunities</b>   |   | PHASE-IN  |   |  |
| <b>ENTITY SPECIFIC (ES) E3</b>   |   |   |   |  |
| ES E3-1<br>Water withdrawals<br>- of which: seawater<br>- of which: fresh water  |   |   |   | Water resources: Metrics<br>Reporting principles and criteria: Metrics: methodologies                      |
| ES E3-2<br>Water discharge   |   |   |   | Water resources: Metrics<br>Reporting principles and criteria: Metrics: methodologies                      |
| ES E3-3<br>Fresh water reuse   |   |   |   | Water resources: Metrics<br>Reporting principles and criteria: Metrics: methodologies                      |
| ES E3-4<br>Reinjected produced water   |   |   |   | Water resources: Metrics<br>Reporting principles and criteria: Metrics: methodologies                      |
| <b>ESRS E4 BIODIVERSITY AND ECOSYSTEMS</b>   |   |   |   |  |
| <b>E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model</b>  |   |   |   | Biodiversity: Material impacts, risks and opportunities (IROs)   |
| <b>ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model</b>   |   |   |   | Biodiversity: Material impacts, risks and opportunities (IROs), Actions taken on material IROs and metrics |
| ESRS 2 SBM-3 – E4 paragraph 16, letter a), point i)  | Par. 16 (a) i – Sustainable Finance Disclosure Regulation |   |   | Biodiversity: Actions taken on material IROs and metrics   |
| ESRS 2 SBM-3 – E4 paragraph 16, letter b)  | Par. 16 (b) – Sustainable Finance Disclosure Regulation   |   |   | Biodiversity: Actions taken on material IROs and metrics   |
| ESRS 2 SBM-3 – E4 paragraph 16, letter c)  | Par. 16 (c) – Sustainable Finance Disclosure Regulation   |   |   | Biodiversity: Actions taken on material IROs and metrics   |
| <b>ESRS 2 IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities</b> |   |   |   | Biodiversity: Material impacts, risks and opportunities (IROs), Actions taken on material IROs and metrics |
| <b>E4-2 Policies related to biodiversity and ecosystems</b>  |   |   |   | Biodiversity: Policies<br>Reporting principles and criteria: Policies                                      |
| ESRS E4-2<br>Sustainable land / agriculture practices or policies, paragraph 24, letter b)   | Par. 24 (b) – Sustainable Finance Disclosure Regulation   |   |   | Biodiversity: Policies<br>Reporting principles and criteria: Policies                                      |



| Disclosure Requirement and related datapoint   | Other EU Regulations                                    | Not material <sup>(*)</sup> / Phase-in  | Cross reference to the Annual Report 2024  | 2024 Sustainability Statement   |
|--|---|---|--|---|
| ESRS E4-2<br>Sustainable oceans / seas practices or policies, paragraph 24, letter c)  | Par. 24 (c) – Sustainable Finance Disclosure Regulation | NOT MATERIAL  |  |   |
| ESRS E4-2<br>Policies to address deforestation, paragraph 24, letter d)  | Par. 24 (d) – Sustainable Finance Disclosure Regulation |   |  | Biodiversity: Policies<br>Reporting principles and criteria: Policies   |
| E4-3 Actions and resources related to biodiversity and ecosystems  |   |   |  | Biodiversity: Actions taken on material IROs and metrics  |
| E4-4 Targets related to biodiversity and ecosystems  |   |   |  | Biodiversity: Targets and commitments   |
| E4-5 Impact metrics related to biodiversity and ecosystems change  |   |   |  | Biodiversity: Actions taken on material IROs and metrics<br>Reporting principles and criteria: Metrics: methodologies             |
| E4-6 Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities  |   | PHASE-IN  |  |   |
| <b>ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY</b>   |   |   |  |   |
| ESRS 2 IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities |   |   |  | Environment and Eni's management system<br>Resource use and circular economy:<br>Material impacts, risks and opportunities (IROs) |
| E5-1 Policies related to resource use and circular economy   |   |   |  | Resource use and circular economy: Policies<br>Reporting principles and criteria: Policies  |
| E5-2 Actions and resources related to resource use and circular economy  |   |   | Operating review:<br>Refining and Chemicals, Circular economy initiatives and chemicals from renewables;<br>Environmental activities | Resource use and circular economy: Actions taken on material IROs   |
| E5-3 Targets related to resource use and circular economy  |   |   |  | Resource use and circular economy: Targets and commitments  |
| E5-4 Resource inflows  |   | NOT MATERIAL<br>The metrics of E5-4 Resource inflows (net of incoming and outgoing hydrocarbons) are not material, as it is not a sector with a high use of materials | Operating review:<br>Refining and Chemicals, Circular economy initiatives and chemicals from renewables                              |   |
| E5-5 Resource outflows   |   |   | Operating review:<br>Refining and Chemicals, Circular economy initiatives and chemicals from renewables                              | Resource use and circular economy: Material impacts, risks and opportunities (IROs), Metrics                                      |
| ESRS E5-5<br>Non-recycled waste, paragraph 37, letter d)   | Par. 37 (d) – Sustainable Finance Disclosure Regulation |   |  | Resource use and circular economy: Metrics<br>Reporting principles and criteria: Metrics: methodologies                           |
| ESRS E5-5<br>Hazardous waste and radioactive waste, paragraph 39   | Par. 39 – Sustainable Finance Disclosure Regulation     |   |  | Resource use and circular economy: Metrics<br>Reporting principles and criteria: Metrics: methodologies                           |
| E5-6 Anticipated financial effects from material resource use and circular economy-related risks and opportunities                                   |   | PHASE-IN  |  |   |



| Disclosure Requirement and related datapoint   | Other EU Regulations                                    | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024                   | 2024 Sustainability Statement  |
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| <b>ESRS S1 OWN WORKFORCE</b>   |   |   |   |  |
| ESRS 2 SBM-2 Interests and views of stakeholders   |   |   |   | General Information: Stakeholder engagement  |
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model  |   |   |   | General Information: Stakeholder engagement<br>Eni's own workforce: Material impacts, risks and opportunities (IROs)   |
| ESRS 2- SBM3 - S1<br>Risk of incidents of forced labour paragraph 14, letter f)  | Par. 14 (f) – Sustainable Finance Disclosure Regulation |   |   | Human rights for Eni: Monitoring human rights, Salient Human Rights Issues   |
| ESRS 2- SBM3 - S1<br>Risk of incidents of child labour paragraph 14, letter g)   | Par. 14 (g) – Sustainable Finance Disclosure Regulation |   |   | Human rights for Eni: Monitoring human rights, Salient Human Rights Issues   |
| <b>S1-1 Policies related to own workforce</b>  |   |   |   | Eni's own workforce: Policies<br>Reporting principles and criteria: Policies   |
| ESRS S1-1<br>Human rights policy commitments, paragraph 20   | Par. 20 – Sustainable Finance Disclosure Regulation     |   |   | Human rights for Eni: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S1-1<br>Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21   | Par. 21 – Benchmark Regulation                          |   |   | Human rights for Eni: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S1-1<br>Processes and measures for preventing trafficking in human beings, paragraph 22   | Par. 22 – Sustainable Finance Disclosure Regulation     |   |   | Human rights for Eni: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S1-1<br>Workplace accident prevention policy or management system, paragraph 23   | Par. 23 – Sustainable Finance Disclosure Regulation     |   |   | Health & safety: Policies<br>Reporting principles and criteria: Policies   |
| <b>S1-2 Processes for engaging with own workforce and workers' representatives about impacts</b>   |   |   |   | Eni's own workforce: Employee engagement   |
| <b>S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns</b>   |   |   | Governance: The Internal Control and Risk Management System | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms<br>Eni's own workforce: Employee engagement, whistleblowing and remediation mechanisms<br>Business conduct: Targets and commitments, Actions taken on material IROs, Reporting and verification process in case of violations of the Code of Ethics, anti-corruption rules and other regulations |
| ESRS S1-3<br>Grievance/complaints handling mechanisms, paragraph 32, letter c)   | Par. 32 (c) – Sustainable Finance Disclosure Regulation |   |   | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms  |
| <b>S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions</b> |   |   |   | General Information: Process and results of the double materiality assessment<br>Human rights for Eni: Monitoring human rights<br>Eni's own workforce: Policies, Employee engagement, whistleblowing and remediation mechanisms, Actions taken on material IROs<br>Health & Safety, Health   |
| <b>S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</b>   |   |   |   | Eni's own workforce: Targets and commitments   |
| <b>S1-6 Characteristics of the undertaking's employees</b>   |   |   |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |



| Disclosure Requirement and related datapoint  | Other EU Regulations   | Not material <sup>(*)</sup> /<br>Phase-in  | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement  |
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| S1-7 Characteristics of non-employees in the undertaking's own workforce  |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-8 Collective bargaining coverage and social dialogue   |  |  |   | Eni's own workforce: Employee engagement, Industrial relations, Metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| S1-9 Diversity metrics  |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-10 Adequate wages  |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-11 Social protection   |  | PHASE-IN   |   |  |
| S1-12 People with disabilities  |  | PHASE-IN   |   |  |
| S1-13 Training and skills development metrics   |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-14 Health and safety metrics   |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ESRS S1-14<br>Number of fatalities and number and rate of work-related accidents, paragraph 88, letters b) and c) | Par. 88 (b), (c) – Sustainable Finance Disclosure Regulation; Benchmark Regulation | PHASE-IN (non-employees)   |   | Health & safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ESRS S1-14<br>Number of days lost to injuries, accidents, fatalities or illness, paragraph 88, letter e)          | Par. 88 (e) – Sustainable Finance Disclosure Regulation                            | PHASE-IN with reference to occupational diseases. Phase-in adopted also for non-employees) |   | Health & safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-15 Work-life balance metrics   |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-16 Remuneration metrics (pay gap and total remuneration)   |  |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ESRS S1-16<br>Unadjusted gender pay gap, paragraph 97, letter a)  | Par. 97 (a) – Sustainable Finance Disclosure Regulation; Benchmark Regulation      |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ESRS S1-16<br>Excessive CEO pay ratio, paragraph 97, letter b)  | Par. 97 (b) – Sustainable Finance Disclosure Regulation                            |  |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| S1-17 Incidents, complaints and severe human rights impacts   |  |  |   | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms, Disputes and non-judicial remedy mechanisms<br>Eni's own workforce: Employee engagement, whistleblowing and remediation mechanisms<br>Reporting principles and criteria: Metrics: methodologies |
| ESRS S1-17<br>Incidents of discrimination, paragraph 103, letter a)   | Par. 103 (a) – Sustainable Finance Disclosure Regulation                           |  |   | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms, Disputes and non-judicial remedy mechanisms   |



| Disclosure Requirement and related datapoint   | Other EU Regulations   | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement  |
|--|--|---|---|--|
| ESRS S1-17<br>Non-respect of the United Nations Guiding Principles on Business and Human Rights and OECD, paragraph 104, letter a) | Par. 104 (a) – Sustainable Finance Disclosure Regulation; Benchmark Regulation |   |   | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms, Disputes and non-judicial remedy mechanisms<br>Eni's own workforce: Employee engagement, Whistleblowing and remediation mechanisms<br>Reporting principles and criteria: Metrics: methodologies |
| <b>ENTITY SPECIFIC (ES)</b>  |  |   |   |  |
| ES S1-1<br>Human rights training hours   |  |   |   | Human rights for Eni: Monitoring human rights<br>Reporting principles and criteria: Metrics: methodologies   |
| ES S1-2<br>Employees who have received human rights training   |  |   |   | Human rights for Eni: Monitoring human rights<br>Reporting principles and criteria: Metrics: methodologies   |
| ES S1-3<br>Local employees abroad  |  |   |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-4<br>Non-Italian employees in positions of responsibility  |  |   |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-5<br>New hires with permanent contracts  |  |   |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-6<br>Training hours  |  |   |   | Eni's own workforce: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-7<br>Near miss   |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-8<br>Fatality index  |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-9<br>Worked hours  |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-10<br>Participation in health promotion initiatives  |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-11<br>Healthcare services supported by Eni   |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-12<br>Occupational diseases claims submitted by heirs  |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-13<br>Tier 1 Process Safety Events   |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| ES S1-14<br>Process safety Tier 2 events   |  |   |   | Health & Safety: Metrics<br>Reporting principles and criteria: Metrics: methodologies  |
| <b>ESRS S2 WORKERS IN THE VALUE CHAIN</b>  |  |   |   |  |
| ESRS 2 SBM-2 Interests and views of stakeholders   |  |   |   | General Information: Stakeholder engagement<br>Workers in Eni's value chain: Actions taken on material IROs  |



| Disclosure Requirement and related datapoint   | Other EU Regulations  | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024                   | 2024 Sustainability Statement  |
|--|---|---|---|--|
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model  |   |   | Risk factors and uncertainties                              | General Information: Stakeholder engagement<br>Workers in Eni's value chain: Material impacts, risks and opportunities (IROs), Actions taken on material IROs<br>Business conduct: Sustainable supply chain management, Actions taken on material IROs   |
| ESRS 2- SBM3 – S2<br>Significant risk of child labour or forced labour in the value chain, paragraph 11, letter b)   | Par. 11 (b) – Sustainable Finance Disclosure Regulation                   |   |   | Workers in Eni's value chain: Actions taken on material IROs   |
| <b>S2-1 Policies related to value chain workers</b>  |   |   |   | Workers in Eni's value chain: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S2-1<br>Human rights policy commitments, paragraph 17   | Par. 17 – Sustainable Finance Disclosure Regulation                       |   |   | Reporting principles and criteria: Policies  |
| ESRS S2-1<br>Policies related to value chain workers, paragraph 18   | Par. 18 – Sustainable Finance Disclosure Regulation                       |   |   | Reporting principles and criteria: Policies  |
| ESRS S2-1<br>Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19   | Par. 19 – Sustainable Finance Disclosure Regulation; Benchmark Regulation |   |   | Workers in Eni's value chain: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S2-1<br>due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19   | Par. 19 – Benchmark Regulation  |   |   | Workers in Eni's value chain: Policies<br>Reporting principles and criteria: Policies  |
| <b>S2-2 Processes for engaging with value chain workers about impacts</b>  |   |   |   | Workers in Eni's value chain: Engagement of the workers in the value chain, Actions taken on material IROs<br>Business conduct: Actions taken on material IROs, Anti-corruption initiatives for Eni's value chain  |
| <b>S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns</b>   |   |   | Governance: The Internal Control and Risk Management System | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms<br>Workers in Eni's value chain: Engagement of the workers in the value chain, Whistleblowing mechanism for workers in the value chain and remediation processes<br>Business conduct: Targets and commitments, Actions taken on material IROs, Reporting and verification process in case of violations of the Code of Ethics, anti-corruption rules and other regulations |
| <b>S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions</b> |   |   |   | Workers in Eni's value chain: Engagement of the workers in the value chain, Actions taken on material IROs<br>Business conduct: Sustainable supply chain management, Actions taken on material IROs  |
| ESRS S2-4<br>Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36  | Par. 36 - Sustainable Finance Disclosure Regulation                       |   |   | Human rights for Eni: Monitoring human rights, Disputes and non-judicial remedy mechanisms<br>Workers in Eni's value chain: Material impacts, risks and opportunities (IROs)<br>Reporting principles and criteria: Metrics: methodologies  |
| <b>S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</b>   |   |   |   | Workers in Eni's value chain: Targets and commitments<br>Business conduct: Targets and commitments   |



| Disclosure Requirement and related datapoint  | Other EU Regulations  | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement   |
|---|---|---|---|---|
| <b>ESRS S3 AFFECTED COMMUNITIES</b>   |   |   |   |   |
| ESRS 2 SBM-2 Interests and views of stakeholders  |   |   |   | General Information: Stakeholder engagement<br>Local communities: Material impacts, risks and opportunities (IROs)                                      |
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model   |   |   |   | General Information: Stakeholder engagement<br>Local communities: Material impacts, risks and opportunities (IROs)                                      |
| S3-1 Policies related to affected communities   |   |   |   | Local communities: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S3-1<br>Human rights policy commitments, paragraph 16  | Par. 16 – Sustainable Finance Disclosure Regulation                       |   |   | Local communities: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S3-1<br>Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines, paragraph 17   | Par. 17 – Sustainable Finance Disclosure Regulation; Benchmark Regulation |   |   | Local communities: Policies<br>Reporting principles and criteria: Policies  |
| S3-2 Processes for engaging with affected communities about impacts   |   |   |   | Local communities: Material impacts, risks and opportunities (IROs)<br>Local communities: Community engagement  |
| S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns  |   |   |   | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms                             |
| S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions |   |   | Integrated Risk Management                | Local communities: Material impacts, risks and opportunities (IROs)<br>Local communities: Community engagement, Actions and metrics                     |
| ESRS S3-4<br>Human rights issues and incidents, paragraph 36  | Par. 36 - Sustainable Finance Disclosure Regulation                       |   |   | Human rights for Eni: Monitoring human rights, Disputes and non-judicial remedy mechanisms<br>Reporting principles and criteria: Metrics: methodologies |
| S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities   |   |   |   | Local communities: Targets and commitments  |
| <b>ENTITY SPECIFIC (ES)</b>   |   |   |   |   |
| ES S3-1 – Security personnel trained on human rights  |   |   |   | Local communities: Actions and metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| ES S3-2 - Security personnel (professional area) trained on human rights  |   |   |   | Local communities: Actions and metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| ES S3-3 - Security contracts containing clauses on human rights   |   |   |   | Local communities: Actions and metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| ES S3-4 - Number of grievances  |   |   |   | Local communities: Actions and metrics<br>Reporting principles and criteria: Metrics: methodologies   |
| <b>ESRS S4 CONSUMERS AND END USERS</b>  |   |   |   |   |
| ESRS 2 SBM-2 Interests and views of stakeholders  |   |   |   | General Information: Stakeholder engagement<br>Clients and consumers: Material impacts, risks and opportunities (IROs)                                  |



| Disclosure Requirement and related datapoint  | Other EU Regulations  | Not material <sup>(*)</sup> /<br>Phase-in                     | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement   |
|---|---|---|---|---|
| ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model   |   |   |   | General Information: Stakeholder engagement<br>Clients and consumers: Material impacts, risks and opportunities (IROs)  |
| S4-1 Policies related to consumers and end-users  |   |   |   | Clients and consumers: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S4-1<br>Policies related to consumers and end-users, paragraph 16  | Par. 16 – Sustainable Finance Disclosure Regulation                           |   |   | Clients and consumers: Policies<br>Reporting principles and criteria: Policies  |
| ESRS S4-1<br>Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17  | Par. 17 – Sustainable Finance Disclosure Regulation; Benchmark Regulation     |   |   | Clients and consumers: Policies<br>Reporting principles and criteria: Policies  |
| S4-2 Processes for engaging with consumers and end-users about impacts  |   |   |   | Clients and consumers: Policies<br>Reporting principles and criteria: Policies  |
| S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns   |   |   |   | Human rights for Eni: Monitoring human rights, Access to Remedial Measures, Whistleblowing process and Grievance Mechanisms<br>Clients and consumers: Customer engagement, Remediation processes and whistleblowing channels                            |
| S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions |   |   |   | Human rights for Eni: Monitoring human rights, Human Rights Due Diligence, Disputes and non-judicial remedy mechanisms<br>Clients and consumers: Customer engagement, Remediation processes and whistleblowing channels, Actions taken on material IROs |
| ESRS S4-4<br>Human rights issues and incidents paragraph 35   | Par. 35- Sustainable Finance Disclosure Regulation                            |   |   | Clients and consumers: Customer engagement, Remediation processes and whistleblowing channels<br>Reporting principles and criteria: Metrics: methodologies  |
| S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities   |   |   |   | Clients and consumers: Targets and commitments  |
| <b>ESRS G1 BUSINESS CONDUCT</b>   |   |   |   |   |
| ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies  |   |   | Governance<br>Integrated Risk Management  | Business conduct: Actions taken on material IROs  |
| ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities  |   |   |   | Business conduct: Material impacts, risks and opportunities (IROs)  |
| G1-1 Business conduct policies and corporate culture  |   |   |   | Business conduct: Policies, Actions taken on material IROs, Conduct, business culture and corruption prevention   |
| ESRS G1-1<br>United Nations Convention against corruption, paragraph 10, letter b)  | Par. 10 (b) – Sustainable Finance Disclosure Regulation                       |   |   | Reporting principles and criteria: Policies   |
| ESRS G1-1<br>Protection of whistle-blowers, paragraph 10, letter d)   | Par. 10 (d) – Sustainable Finance Disclosure Regulation; Benchmark Regulation | NOT APPLICABLE – There are "whistleblowers" policies in place |   | Business conduct: Policies<br>Reporting principles and criteria: Policies   |
| G1-2 Management of relationships with suppliers   |   |   |   | Business conduct: Sustainable supply chain management, Supplier Payment Practices   |



| Disclosure Requirement and related datapoint  | Other EU Regulations  | Not material <sup>(*)</sup> /<br>Phase-in | Cross reference to the Annual Report 2024 | 2024 Sustainability Statement   |
|---|---|---|---|---|
| ES G1-1<br>Number of suppliers involved in awareness, measurement and collaboration initiatives on ESG topics                               |   |   |   | Business conduct: Sustainable supply chain management<br>Reporting principles and criteria: Metrics: methodologies  |
| ES G1-2<br>% of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics              |   |   |   | Business conduct: Sustainable supply chain management<br>Reporting principles and criteria: Metrics: methodologies  |
| ES G1-3<br>% of the value of active contracts with suppliers involved in awareness, measurement and collaboration initiatives on ESG topics |   |   |   | Business conduct: Sustainable supply chain management<br>Reporting principles and criteria: Metrics: methodologies  |
| <b>G1-3 Prevention and detection of corruption and bribery</b>  |   |   |   | Business conduct: Actions taken on material IROs, Conduct, business culture and corruption prevention, The role of the Internal Audit department and related actions<br>Reporting principles and criteria: Metrics: methodologies |
| <b>G1-4 Incidents of corruption or bribery</b>  |   |   |   | Business conduct: Actions taken on material IROs, Conduct, business culture and corruption prevention, The role of the Internal Audit department and related actions<br>Reporting principles and criteria: Metrics: methodologies |
| ESRS G1-4<br>Fines for violation of anti-corruption and anti-bribery laws, paragraph 24, letter a)  | Par. 24 (a) – Sustainable Finance Disclosure Regulation; Benchmark Regulation |   |   | Business conduct: Actions taken on material IROs, Conduct, business culture and corruption prevention, The role of the Internal Audit department and related actions<br>Reporting principles and criteria: Metrics: methodologies |
| ESRS G1-4<br>Standards of anti-corruption and anti-bribery, paragraph 24, letter  | Par. 24 (b) – Sustainable Finance Disclosure Regulation                       |   |   | Business conduct: Actions taken on material IROs, Conduct, business culture and corruption prevention, The role of the Internal Audit department and related actions<br>Reporting principles and criteria: Metrics: methodologies |
| <b>G1-5 Political influence and lobbying activities</b>   |   |   |   | Business conduct: Eni's lobbying activities, Political contributions  |
| <b>G1-6 Payment practices</b>   |   |   |   | Business conduct: Actions taken on material IROs, Supplier Payment Practices<br>Reporting principles and criteria: Metrics: methodologies   |



# Certification of the Sustainability Statement pursuant to article 81-ter, paragraph 1, of the Consob Regulation n. 11971 of 14 May 1999 and subsequent changes and additions

The undersigned Claudio Descalzi and Francesco Esposito, in their quality as Chief Executive Officer and Officer responsible for the preparation of financial reports of Eni, pursuant to article 154-bis, paragraph 5-ter, of Legislative Decree February 24, 1998, no. 58, certify that the Sustainability Statement included in the Management Report has been prepared:

- a) in accordance with the reporting standards applied pursuant to Directive 2013/34/UE of the European Parliament and the Council of 26 June 2013 and Legislative Decree September 6, 2024, no. 125;
- b) with the specifications adopted pursuant to Article 8, paragraph 4, of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020.

March 18, 2025

/s/ Claudio Descalzi

Claudio Descalzi  
Chief Executive Officer

/s/ Francesco Esposito

Francesco Esposito  
Head of accounting  
and financial statements