

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	Eni
Sector	Oil and gas
Headquarters	Rome, Italy
Type	Publicly listed
Date of submission to company (month/year)	January 2026
PREAMBLE MSG Participation	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	GHANA INDONESIA KAZAKHSTAN MEXICO MOZAMBIQUE NIGERIA REPUBLIC OF THE CONGO TIMOR-LESTE UNITED KINGDOM
Secretariat comment on MSG participation	The Secretariat notes Eni's proactive engagement in the multi-stakeholder groups (MSGs) in Ghana, Indonesia, Kazakhstan,

	<p>Mexico, Mozambique, Nigeria, Republic of Congo, Timor-Leste and the United Kingdom.</p> <p>The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.</p>
<p>EXPECTATION 1 <i>Public support for the EITI</i></p> <p><i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i></p>	
<p>Does the company publish a statement of support for the EITI and the objective of the EITI Association?</p>	<p>Yes</p>
<p>URL for Statement Support</p>	<p>Transparency Webpage: https://www.eni.com/en-IT/sustainability/transparency.html</p>
<p>Secretariat's assessment on Expectation 1</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Eni publishes a statement of support on its website. See URL.</p>
<p>EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i></p> <p><i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i></p>	
<p>Does the company publish a list of controlled subsidiaries?</p>	<p>Yes</p>
<p>URL for controlled list of subsidiaries</p>	<p>Annual Report 2024: https://www.eni.com/content/dam/enicom/documents/eng/reports/2024/ar-2024/Annual-Report-2024.pdf</p>
<p>EITI implementing countries where the company operates.</p>	<p>ALBANIA ANGOLA ARGENTINA</p>

	<p>CÔTE D'IVOIRE</p> <p>GHANA</p> <p>INDONESIA</p> <p>IRAQ</p> <p>KAZAKHSTAN</p> <p>MEXICO</p> <p>MOZAMBIQUE</p> <p>NIGERIA</p> <p>NORWAY</p> <p>REPUBLIC OF THE CONGO</p> <p>TIMOR-LESTE</p> <p>UNITED KINGDOM</p>
Does the company make disclosures in accordance with the EITI Standard or in relation to EITI implementing countries?	Yes
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	<p>List of its controlled subsidiaries published. See URL p. 425- 469.</p> <p>The company is assessed as making disclosures in accordance with the EITI Standard. The Secretariat encourages Eni to disclose payments to the government in Angola.</p>
<p>EXPECTATION 3</p> <p><i>Disclosure of taxes and payments in non-EITI implementing countries</i></p>	<p><i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i></p>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates	Yes

upstream in the oil, gas and mining sectors?	
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	Report on Payments to Governments 2024: https://www.eni.com/content/dam/enicom/documents/eng/reports/2024/Report-payments-governments-2024.pdf
Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	<p>Eni discloses taxes and payments to governments in non-EITI implementing countries. See URL Report on Payments to Governments 2024.</p> <p>Eni discloses taxes and payments to governments disaggregated by project. See URL.</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
EXPECTATION 4 <i>Commodity trading transparency</i>	<i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i>
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	Yes
If yes, which countries?	<p>CÔTE D'IVOIRE</p> <p>NIGERIA</p> <p>NORWAY</p> <p>REPUBLIC OF THE CONGO</p>

Does the company make disclosures in line with the EITI Standard and reporting guidelines?	Yes
URL for disclosure(s)	<p>Commodity Trading Disclosure 2024: https://www.eni.com/content/dam/enicom/documents/eng/reports/2024/Commodity-Trading-information-2024.pdf</p> <p>Transparency Webpage: https://www.eni.com/en-IT/sustainability/transparency.html</p>
Secretariat's assessment on Expectation 4	Expectation met
Secretariat comment	<p>The company buys oil, gas and/or mineral resources from the state in EITI implementing countries.</p> <p>Eni discloses information in line with EITI Standard and EITI reporting guidelines for companies buying oil, gas and minerals from governments. See URL for commodity trading disclosure.</p> <p>The company reports in line with template one of the EITI reporting guidelines for companies buying oil, gas and minerals from governments.</p> <p>The Secretariat recommends full disclosure in line with Templates 2 and 3 of the commodity trading guidelines.</p>
EXPECTATION 5 <i>Disclosure of audited financial statements</i>	<i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i>
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	<p>Annual Report 2024: https://www.eni.com/content/dam/enicom/documents/eng/reports/2024/ar-2024/Annual-Report-On-Form-20-F-2024.pdf</p>
Secretariat's assessment on Expectation 5	Expectation met

Secretariat comment	Eni discloses audited financial statements. See URL p. 186.
EXPECTATION 6 Beneficial ownership transparency	<i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i>
Does the company publish a statement of support for beneficial ownership transparency?	No
URL for statement of support for Beneficial Ownership	N/A
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	Borsa Italiana, New York Stock Exchange
URL to stock exchange	Borsa Italiana: https://www.borsaitaliana.it/borsa/azioni/scheda/IT0003132476.html?lang=en NYSE: https://www.nyse.com/quote/XNYS:E Website: https://www.eni.com/en-IT/investors.html
URL for recent beneficial ownership disclosures	20-F form: https://www.sec.gov/ix?doc=/Archives/edgar/data/1002242/000155485525000286/e-20241231.htm

	Website: https://www.eni.com/en-IT/governance/shareholding-structure.html
Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>The company does not publish a statement of support for beneficial ownership transparency.</p> <p>Eni discloses beneficial owners in line with applicable regulations and listing requirements. See URLs. The company is publicly listed on the Borsa Italiana and the New York Stock Exchange.</p> <p>The company publishes a list of major shareholders in its 20-F form. See URL item 7 p. 156.</p> <p>To make further progress on Expectation 6, please publish a statement of support for beneficial ownership transparency.</p>
EXPECTATION 7 <i>Due diligence processes and anti-corruption policies</i>	<i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i>
Does the company publish an anti-corruption policy?	Yes
URL to the policy	<p>Anti-Corruption Compliance Programme: https://www.eni.com/en-IT/governance/controls-and-risks/anti-corruption.html</p> <p>Management System Guideline: Anti-Corruption: https://www.eni.com/content/dam/enicom/documents/eng/governance/controls-risks/MSG-Anti-Corruption.pdf</p> <p>Policy ECG Anti-Corruption: https://www.eni.com/content/dam/enicom/documents/eng/governance/controls-risks/Policy-ECG-Anti-Corruption.pdf</p>
Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of	Yes

<p>beneficial ownership data?</p>	
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>Eni's anti-corruption framework sets out how the company manages corruption risk with regard to the identification and use of beneficial ownership data. The company publishes its anti-corruption policies and processes on its website, on the page Anti-Corruption Compliance Programme.</p> <p>Eni's anti-corruption regulations and controls extend to the activities of its subsidiaries. In alignment with its Code of Ethics, Eni states that it "firmly condemns any form of corruption," emphasizing that corruption is not only illegal but also undermines sustainable development, distorts fair competition, and damages corporate reputation".</p> <p>Eni's ECG Anti-Corruption report outlines the highest risk areas identified by the company and how those risks are being mitigated. See URL.</p> <p>Eni provides a description of its due diligence process on its Anti-Corruption Compliance Program webpage. It states that due diligence must be initiated promptly and completed before entering into commitments with counterparties deemed at risk. As part of this process, Eni undertakes a reconstruction of the ownership structure using a risk-based approach. This involves identifying all individuals and entities, natural and legal persons, who directly or indirectly, individually or collectively, hold shares or quotas in the potential counterparty. The objective is to identify 100% of the shareholdings, as far as possible, using available information tools. The policy further describes Eni's risk-based approach and risk mitigation measures including the due diligence process.</p>
<p>EXPECTATION 8 Contract transparency</p> <p><i>Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i></p>	

Does the company publish a statement of support for contract transparency?	Yes
URL for statement of support for contract transparency	Transparency Webpage: https://www.eni.com/en-IT/just-transition/transparency.html
Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?	Yes
Secretariat's assessment on Expectation 8	Expectation met
Secretariat comment	<p>Eni publishes a statement of support for contract transparency. See URL.</p> <p>The company is assessed to contribute to disclosure of contracts and licenses in EITI implementing countries. The company is encouraged to support disclosures of its service contract for Zubair in Iraq (ENI Iraq B.V. is noted as an operator of Zubair).</p>
EXPECTATION 9 Gender Diversity	<i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i>
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	<p>ECG Policy Diversity and Inclusion: https://www.eni.com/content/dam/enicom/documents/eng/governance/2023/policy-ecg-di-eni-spa_EN_r01.pdf</p> <p>Annual Report 2024: https://www.eni.com/content/dam/enicom/documents/eng/reports/2024/ar-2024/Annual-Report-2024.pdf</p>

	<p>Policy ECG Zero Tolerance: https://www.eni.com/content/dam/enicom/documents/eng/governance/rules/zero-tolerance/Policy-ECG-Zero-Tolerance-EN.pdf</p>
Does the company disclose employment data disaggregated by gender?	Yes
URL for gender disaggregated employment data	<p>Annual Report 2024: https://www.eni.com/content/dam/enicom/documents/eng/reports/2024/ar-2024/Annual-Report-2024.pdf</p>
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	<p>Eni publishes a commitment and/or policy on gender diversity on its website. See URL ECG Policy Diversity and Inclusion.</p> <p>The company discloses employment data disaggregated by gender. See URL for Annual Report p. 188–189. The gendered data is also provided at the Board-level. See URL p. 30.</p> <p>The company publishes information on its gender pay gap. See URL p. 189.</p>