

Eni's response to BHRRC's "Invitation to respond - Parallel imports", dated May 4, 2023

- 1. Has your company put in place appropriate internal mechanisms and tools to carry out enhanced due diligence of your supply chains, intermediaries, customers and end-users to understand the risk of your products' diversion to Russia? If yes, please provide details.**

Eni has in place and implements adequate internal procedures designed to ensure compliance with applicable sanctions, which include specific counterparties' screenings and due diligence controls aimed at identifying, inter alia, restricted counterparties and concerns regarding counterparties' reputation and behaviour. Internal controls are significantly strengthened in case of counterparties referable to countries at risk of sanctions or other possible red flags. Our export to Russia of the sole product inserted in the parallel imports list adopted by the Russian Ministry of Industry and Trade – i.e., lubricants – was a largely marginal business linked to a now dismissed downstream presence in Russia. Given the background and nature of our business, we do not think that diversion to Russia is a live risk in this context.

- 2. Does your company consider potential red flags that suggest the use of front companies that may hide the true end-users of your products and thereby evade sanctions and export controls? If yes, please provide details.**

We do evaluate red flags, including those included in public guidance issued by relevant authorities. Our distribution network and customers of the sole product inserted in the parallel imports list adopted by the Russian Ministry of Industry and Trade have been made aware of existing restrictions and are contractually prohibited from further distributing Eni's products.

(Potential red flags may include companies registered recently; companies based in Armenia, Belarus, Turkey, Kazakhstan, Kyrgyzstan, Uzbekistan or other countries helping Russia circumvent sanctions; companies making large orders of products within a short space of time; companies with obscure beneficial ownership structures, etc.)

- 3. Has your company taken any other actions to prevent re-export of your products to Russia?**

We have implemented adequate internal policies to ensure compliance with sanctions and export control provisions. However, as mentioned above, given the background and nature of our business, we do not think that diversion to Russia is a live risk in this context.