

L'esperienza di eni nella definizione e implementazione del programma anti-corruzione

eni's Experience in Setting out and Implementing the Anti-bribery Compliance Program

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Abstract: As a multinational company acting in the five continents, eni is strongly committed in fighting against corruption and promoting compliance with the relevant laws and conventions, also through its active participation in international initiatives to that purpose, such as UN Global Compact and PACI. A description of eni's anticorruption and compliance program is provided, with particular reference to a) the Code of Ethics, adopted since 1994 (with the original name of Code of Conduct) that expressly rejects any form of corruption thus prohibiting bribes, illegitimate favours, collusions, requests for personal benefits, either directly or through third parties; b) the "Model 231", aimed at preventing the commission or the attempt of any offence under Italian Legislative Decree No. 231 of June 8, 2001; c) the Anti-Corruption Management System Guideline that sets out (i) the principles, (ii) the basic rules to be followed and (iii) the controls to be granted in respect of any business activity and identifies "high risk areas" needing a specific discipline; d) the Anti-Corruption Regulations issued by eni within the frame of the aforesaid MSG in order to state a detailed discipline for each "high risk area". Furthermore, a specific focus is dedicated to the Anticorruption Legal Support Unit that has been established within the Legal Department in order, *inter alia*, (i) to provide specialized legal advice and support to the business units of both eni and its subsidiaries, (ii) to keep the anticorruption and compliance program fully effective and constantly updated also in relation to the evolution of the relevant legislation and (iii) to supervise anticorruption training for personnel of eni group. It is furthermore provided a description of the internal rules concerning the selection and the management of contractual relationships with third parties considered at risk, identified as "covered business partners". In their respect, eni's anticorruption rules provide appropriate due diligence checks and protection clauses to be included in each relevant agreement. Finally, it is given a synthetic presentation of the main anti corruption initiatives undertaken by eni within the international context.

Keywords: Anti-bribery compliance program, Multinational companies, eni's anticorruption rules.

* Responsabile Assistenza Legale Antibribery Italia, Europa