COMPLIANCE FORM

To: Eni Iraq

Procedure *Qualification Process/Tender n*.

The undersigned Enterprise KIFCO (AL-KIFAT GENERAL TRDADING AND CONTRACTING COMPANY LTD.) (hereinafter the "Enterprise")
with registered office and registration for tax purposes in Iraq, Basra
Tax code (90202371)

Telefax ....//. tel. +964 782 5290905 E-mail info@kifcoltd.com

with reference to the above procedure

represents to COMPANY that

a. it has reviewed and signed the "Eni's Supplier Code of Conduct";
b. it represents and warrants that it has reviewed the attached COMPANY's data protection notice on the processing of personal data of the Enterprise set out in Annex 1 and that it has understood the purposes, legal bases, data retention criteria and processing methods indicated therein;
c. it undertakes to comply with all the provisions in force regarding the protection of personal data, where applicable, with regard to the personal data of its own staff and those of any subcontractors and to indemnify and hold harmless the COMPANY from any liability, expense or consequence that may arise in case of non-observance of these provisions;
d. it represents and warrants that it has reviewed and understood: (a) the Eni's Supplier Code of Conduct, adopted by the COMPANY and duly signed by the Enterprise's authorised representative; (a) the general standards of transparency of the sensitive activities related to the Model 231 pursuant to Legislative Decree 231/2001; (b) the Anti-Corruption Management System Guideline of COMPANY; (c) Policy "Respect for Human Rights in Eni"; d) Eni's Slavery and Human Trafficking Statement. The Enterprise takes note that each of the documents under (a) to (d) above are available on the website www.eni.com and undertakes to comply with the principles contained therein, and shall cause its directors, officers, employees, and collaborators engaged by the Enterprise (for such to be intended consultants, advisors, agents and equivalent figures – hereinafter the "Collaborators") to comply with the principles contained therein;
e. it undertakes to comply with, and shall cause its directors, officers, employees, and Collaborators to comply with the laws and regulations in force regarding anti-corruption

including, without limitation, laws aimed at combating and punishing corruption such as the FCPA, the UK Bribery Act 2010, the Italian Legislative Decree no. 231 dated 8th June 2001 and any other applicable anti-corruption laws in force worldwide, as well as international anti-corruption treaties such as the Organisation for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the United Nations Convention against Corruption ("**Anti-Corruption Laws**") and, in particular, to refrain and to cause its directors, employees and Collaborators to refrain from (a) offering, promising, giving, paying or authorizing anyone to give or pay, directly or indirectly, material, financial or other advantage to a Public Official[1] or private party in breach of any above mentioned anti-corruption laws, and (b) accepting or authorizing anyone to accept, directly or indirectly, material, financial or other advantage or a request of material, financial or other advantage in breach of any of the above mentioned anti-corruption laws;

f. it accepts that any remuneration to be paid will be exclusively commensurate with the activities to be performed under the awarded contract, if any, and that the payments will be made exclusively to the contractual counterpart, in the countries where the parties are incorporated or in the country where the awarded contract, if any, is performed;

g. *(please, select the alternative)*

☐ it is/it is part of a Public Administration[2]

(specify the affiliation):________________________________ ____________________

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or

☑ that it is not/it is not part of any Public Administration;

h. *(please, select the alternative)*

☑ none of the shareholders, of the members of the Board of Directors, nor Operations Manager[3] of the Enterprise, nor any Family Members [4] of such persons are or have been

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[1] Public Officials means: a) anyone occupying a public legislative, judicial or administrative function;
b. anyone acting in an official capacity for or on behalf of (i) a national, regional or local public administration, (ii) an agency, department or instrumentality of the European Union or of an Italian or non-Italian national, regional or local public administration,, (iii) a company owned, controlled or invested (when the public administration, by virtue of powers or prerogatives of a public information nature, substantially exercises control over a company) by an Italian or foreign public administration (including, for example, employees of "national oil companies"); (iv) an international public organization, such as the European Bank for Reconstruction and Development, the International Bank for Reconstruction and Development, the International Monetary Fund, the World Bank, the United Nations or World Trade Organization; or (v) a political party, a member of a political party or a candidate for an Italian or foreign political office;
c. anyone in charge of providing a public service, i.e. whoever performs a public service for whatever reason, where public service means an activity that is governed in the same way as a public function, except that the power vested in the latter is absent.
Pursuant to Anti-Corruption Laws listed in the para herein and in particular jurisprudence deriving from it, the representatives of local communities are treated as Public Officials.

[2] Public Administration means: any body, office or authority, central or peripheral, public official or public service employee exercising legislative, judicial or administrative powers or functions in order to serve the public interest.

[3] Operations Manager means: any operations, general or equivalent manager

[4] Family Members means:

Public Officials who worked, currently work, or are likely to work in the future, as part of their role, in the performance of activities in which Company and its affiliates have an interest;

or

☐ in case of one or more of the above person is a Public Official, indicate the person and the position held as a Public Officials and, in the case of Family Members, the relationship of familiarity:

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i. neither the *[owner(s) if the Enterprise is organized as sole proprietorship, or the partners if the Enterprise is a general partnership or a limited partnership, or the directors with powers of representation if the Enterprise is another type of company or an unincorporated consortium]* - nor the Operations Manager – have ever been, or are currently, (i) suspended from doing business or disqualified as a director, (ii) subject to investigation, or charged with, or sentenced for or convicted for (a) serious crimes against the State or (b) any offences concerning their professional conduct or (c) crime(s) of participation in a criminal organization, (d) or of corruption, fraud or money-laundering in any court worldwide *[or, in cases in which one or more definitive convictions have been made for any crime, declare all relevant penalties, sentences, orders and judgments, even if the convicted person is not named in the criminal record, indicating the date of sentencing, crime for which the person was convicted and the sanctions imposed as it is the COMPANY's duty to evaluate the influence the crime may have on moral and professional reliability, also based on the contract to be awarded.]*; **See Note 1**

i (bis). neither the *[owner(s) if the Enterprise is organized as sole proprietorship, or the partners if the company is a general partnership or a limited partnership, or the directors with powers of representation if the Enterprise is another type of company or an unincorporated consortium]* - nor the Operations Manager – have ever been, or are currently, subject to investigation, or charged with, or sentenced for or convicted for serious environmental crimes in any court worldwide [*or, in cases in which one or more definitive convictions have been made for any environmental crime declare all penalties, sentences or judgments, even if the convicted person is not named in the criminal records, indicating the date, crime for which convicted and the sanction imposed, as it is the COMPANY's duty to evaluate the influence the crime may have on moral and professional reliability, also based on the contract to be awarded*]; - **See Note 1**

j. that, to the best of his/her knowledge, either those who held the position of [*owner(s) if the Enterprise is organized as sole proprietorship, or the partners if the company is a general partnership or a limited partnership, or the directors with powers of representation if the Enterprise is another type of company or an unincorporated consortium]* - or the Operations Manager in the previous three years, meet the requirements indicated above in letters i, i bis) *[or, where proceedings are pending*

the spouse/partner of the individual; grandparents, parents, brothers and sisters, children, nieces, nephews, grandchildren, aunts, uncles and first cousins of the individual and their spouse/partner; the spouse/partner of each of these individuals.

against the above persons under letters i) and i bis) and/or have been definitively convicted for any crime, provides details of the proceedings, the crime attributed and the acts and measures adopted by the Enterprise to dissociate itself from the relevant criminal act]; **See Note 1**

k. it undertakes to promptly communicate any changes in the corporate structure, the Directors, any Operations Manager and, in general, any person who are vested with the power to direct, represent or manage the business of the Enterprise which may occur after the signature of this Form;

l. *(please, select the alternative)*

☑ neither the Enterprise, nor its shareholders, directors, employees or Collaborators have committed any breach or are under investigations or judicial proceeding for alleged breach of Leg. Dec. no. 231 of 8th June 2001 as amended and/or of any provisions against corruption[5]

or

☐ the Enterprise, its shareholders, directors, employees or Collaborators have committed breach or are subject to investigations or judicial proceeding with respect to an alleged breach of Leg. Dec. no. 231 of 8th June 2001 as amended and/or of the provisions in force against corruption *(give details of the alleged breach, investigation or judicial proceeding)*

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m. *(please, select the alternative)*

☑ no conflict of interest[6], even a potential one, exists between the Enterprise– and/or between its controlling companies or subsidiaries - and COMPANY and/or its affiliates

☐ the following situation of conflict of interest exists, or potential conflict of interest *(specify the exact situation of conflict of interest, even a potential one, between the Enterprise - and/or between its controlling company and/or subsidiary - and COMPANY and its affiliates):*

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n. *(please, select the alternative)*

☐ the following Trust Company(ies) is/are present in the control chain of the Enterprise:

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and the relevant Trustees (physical persons ultimate beneficiaries) are:

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☐ no Trust Company is present in the control chain of the Enterprise.

[5] This requirement has the scope to obtain a representation from the Enterprise in case any of its shareholders, directors, employees or Collaborators has been engaged as a shareholder, director, employee or Collaborator in Italy and in relation to this such person has violated provision under Leg. Dec. no. 231 of 8th June 2001 and therefore has been subject to investigation or judicial proceeding for such violation.

[6] The "Conflict of interest" means any situation referring to the Enterprise that may interfere with the ability of COMPANY and its directors, officers, employees and Collaborators to make impartial decisions in the latter's interest.

And further represents that

o. the Enterprise has not committed serious infringements of regulations regarding safety or any other obligation deriving from labour relations, including regulations concerning the right to work of disabled persons;
p. the Enterprise has not been found to be seriously negligent or acting in bad faith in execution of services for COMPANY and its affiliates, nor made a serious error in the exercise of its professional activities;
q. the Enterprise fulfils its obligations relating to the payment of duties and taxes, in accordance with the legislation of the state in which it is established;
r. the Enterprise fulfills its obligations relating to the payment of social security contributions in accordance with the legislation of the state in which it is established;
s. that no sanction or prohibition has been imposed on the above Enterprise nor other sanctions which entail prohibition from contracting for the public administration;
t. the Enterprise is not in a state of bankruptcy, enforced liquidation nor it is the subject of any insolvency procedure.

The Enterprise acknowledges that:

- failure to meet even one of the general requirements referred to in points a. to f. and o. to t. will be grounds for exclusion from the Procedure, without prejudice to any other legal rights and remedies.
- the submission of any information resulting to be, false or incomplete, in relation to points g. to n. will be grounds for exclusion from the Procedure, without prejudice to any other legal rights and remedies;
- COMPANY may request an updated Compliance Form at any time;
- without prejudice to any obligations to submit all due certifications/evidence as may be required by law, COMPANY reserves the right to request the submission of any such certificate(s) as may be deemed necessary to show that the above requirements are met and verify at any time, by any lawful means, the truthfulness of this Form.

We, the Enterprise also acknowledge that in case of award, we shall request any of our subcontractors to undersign the same representations of this Compliance Form.

COMPANY reserves the right to request any Enterprise established in any jurisdiction other than Italy to produce appropriate certificates and/or documents issued by the competent foreign authorities (as required by the legislation in force in the Country concerned), or at COMPANY's discretion, a declaration made by authorized representatives of the Enterprise before a competent judicial or administrative authority, or notary or a competent professional or trade body of the jurisdiction in question.

A) The valid identity document of the signatory having no. 20006229250 issued on 27.03.2022 by Directorate of Nationality and Civil Information is attached; and.

B) power of attorney or other document confirming the authority of the signatory to sign this Form on behalf of Enterprise.

Place and date 06.08.2024, Basra, Iraq

Signature: ………………………………………………………… (stamp)

Name: KARRAR SABAH KADHIM SALAIT

Title: CEO

being a person who, in accordance with the laws of ___IRAQ___________________, is authorized to sign the Form on behalf of Enterprise.

Note 1: indicate below, where appropriate, the information required (judgements, convictions, imposition of the penalty requested, etc. with relevant details as specified above):

Annex 1
COMPANY's data protection notice on the processing of personal data of the Enterprise

Information to be provided to the data subjects for the processing of personal data

Pursuant to Applicable Data Protection Legislation, the COMPANY, (hereinafter referred to also as the "**controller**") provides the following information to its counterparty with reference to the contract and all the preliminary and subsequent phases thereto. Please note that such phases may also be managed via the COMPANY's online procurement portal. Where the counterparty is a natural person, the following policy is addressed directly to them. However, even in relation to a contractual relationship with a legal person, the company may collect personal data related to the individuals who act on behalf of such legal person. In this regard, the COMPANY sets out the following information and the contractual counterparty shall transfer such information to the data subjects.

Where the counterparty is a natural person, the following notice is addressed directly to them. However, even in relation to a contractual relationship with a legal person, the COMPANY may collect personal data related to the individuals who act on behalf of such legal person. In this regard, the COMPANY sets out information below and the contractual counterparty shall transfer such information to the data subjects.

1. Who am I providing my personal data to?

To COMPANY which acts as a controller.

2. Where can I find information about the processing of my personal data?

Information about how the controller processes the personal data of data subjects can be requested by writing to the COMPANY at the address provided in paragraph 1 or by emailing data protection officer (DPO) appointed by the COMPANY at dpo@eni.com.

3. What kind of data is processed by COMPANY?

COMPANY shall process all personal data provided by the contractual counterparty to Company during the Tender stage and the duration of the contract with the COMPANY (the "**contract**"). Such personal data includes personal details, place of birth and residence, tax code and/or VAT number, telephone number/email address, CV, bank details and any changes thereto and other additional data provided by the contractual counterparty or acquired by COMPANY during the Tender and the duration of the contract (the "**personal data**" or "**data**"). COMPANY will process personal data also as part of the management of procurement activities via the online portal, information related to the user ID and password of users will also be processed.

All the above information is considered personal data for the purposes of the applicable data protection legislation to the extent that it relates directly or indirectly to identified or identifiable natural persons (e.g. directors, employees, managers, collaborators and consultants of the contractual counterparty) or to the contractual counterparty personally when it is a natural person.

In certain cases, COMPANY may also request judicial data relating to criminal convictions (e.g. criminal records, the register of administrative sanctions related to crimes and related pending charges).

4. What is the reason for requesting and collecting personal data and purposes for which it will be used?

The personal data of the data subjects are processed:

a. to comply with legal obligations under applicable law; and

b. for purposes related and/or connected to the evaluation of the bid and the subsequent management of any awarded contract, specifically:

(i) to assess the technical, economic and financial suitability of the bid and check that the contractual counterparty possesses all the requirements imposed by the applicable law, for the purposes of potentially awarding a contract;

(ii) to allow for legislative, technical and economic management of the contractual relationship that would be entered into in case of the award of a contract and compliance with the legal obligations in connection with such award.

c. Furthermore, personal data collected may be processed in case of non-recurring mergers, sales or transfers of business units to allow the transactions necessary for the due diligence activities or to defend any legal claims and also in relation to the related preliminary activities.

5. Why COMPANY needs to process personal data and what happens if it is not provided?

(a) As set out in paragraph 4, point a, the data may be processed for the purpose of compliance by COMPANY with its legal obligations, for example, in relation to taxation, anti-money laundering and occupational safety regulations. Furthermore, the data may be processed in compliance with legal requirements relating to anti-Mafia communications and information or related to the prevention of organised crime or other serious social crime in cases set out by the applicable law or when certain documentation/information is legally required to be part of the Tender and, in all other cases, to ensure the moral suitability of those who intend to take part in the Tender and supplier selection procedures.

(b) The processing of personal data for the purposes set out in paragraph 4, point b is necessary for the award of the contract to the counterparty or to carry out the pre-contractual measures procedures provided for by the applicable laws or to comply with COMPANY's policies.

The COMPANY will be unable to consider a bid and to enter into a contractual relationship with you should you refuse to share your personal data with the COMPANY for the purposes indicated above.

Any data processing under paragraph 4 point c related to COMPANY events (sale of the company or business units), due diligences or to defend legal claims and in relation to the related preliminary activities will be performed based on the legitimate interest of the COMPANY in continuing its commercial business and to protect its rights.

6. How will the data be processed?

Data processing may be performed using electronic or automated means, managed using tools suitable to ensure security and confidentiality and will include all operations or sets of operations necessary for the processing itself.

7. Who will have access to the personal data?

The personal data are processed by personnel appointed by the controller for the purposes set out in paragraph 4.

The controller may share the personal data with the competent authorities, where requested or legally required and the following categories of recipients, exclusively for the purposes set out in paragraph 4:

- other subsidiaries of Eni S.p.A.;
- insurance companies for the settlement of claims;
- credit collection companies;
- other companies with which the controller has agreements;
- professional services and consultancy firms engaged to assist with ordinary management and disputes;
- Eni S.p.A.'s control/supervisory bodies;
- companies that provide IT services;independent auditors.

The data, however, will not be disclosed, except as required by legal obligations. With reference to the data shared with above recipients, such recipients may act, depending on the situation, as processors (in which case, they will receive the necessary instructions from the controller) or as independent data controllers.

If necessary, in order to pursue the purposes set out in paragraph 4, the data may also be transferred abroad to companies with offices outside the area to which the applicable data protection legislation applies. Some of these jurisdictions may not guarantee the same level of data protection as guaranteed by the country in which the data subject resides. In such case, the controller shall ensure that the data is processed in a confidential manner and, where necessary, by entering into agreements ensuring a suitable level of protection and/or adopting the standard contractual clauses set out by the European Commission, if applicable.

The COMPANY shall only share the personal data strictly necessary to achieve the specific purposes for which they are intended with the aforementioned recipients.

8. How long will the personal data be stored for?

The personal data will be stored in the filing systems, including electronic ones, of the controller and protected using adequate safety measures, for the time necessary for the purposes set out in paragraph 4, and will subsequently be erased and/or destroyed.

In any case, the data will be stored for ten years from the end of the contractual relationship with you, in order to allow the company to defend itself against any possible claims made in relation to the contract itself. The personal data may be stored for a longer period in the case of a dispute, requests from the competent authorities or where this is stipulated by the applicable law.

9. What rights do I have any rights in relation to the personal data?

At any time, you have the right to:

- obtain from the controller confirmation as to whether or not your personal data are being processed, and if this is the case, access to the following information *(i)* the purposes of the processing; *(ii) the* categories of personal data being processed; *(iii)* the recipients or categories of recipients of the personal data to whom the personal data have been or will be transferred, specifically recipients in third countries or international organisations; *(iv)* where possible, the envisaged period for which the personal data will be stored, or if not possible, the criteria used to determine that period; *(v)* the right to lodge a complaint with a supervisory authority; *(vi)* where the personal data were not collected from you, any available information about their source; *(vii)* the existence of automated decision-making, including profiling, and information about the logic involved and the envisaged consequences of such processing for you;
- obtain the rectification of inaccurate personal data or/and supplement incomplete personal data, taking into account the purposes of the processing;
- obtain the erasure of your personal data where one of the following grounds applies:

  (a) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;

  (b) the data subject withdrew its consent on which the data processing was based and/or if there is no other legal ground for the processing;

  (c) the data subject objects to the processing and there are no overriding legitimate grounds for the such processing is to be performed, or the data subject objects to the processing for direct marketing purposes;

  (d) the personal data have been unlawfully processed;

  (e) the personal data have to be erased or destroyed in compliance with the applicable laws in European Union or applicable law to which the controller is subject;

  (f) the personal data have been collected in relation to the offer of information society services directly to a child;
- obtain restriction of processing of the personal data in compliance with the applicable laws;
- receive the personal data provided to the controller, in a structured, commonly used and machine-readable format. You also have the right to transmit such data to another controller without hindrance;
- the right to object, on grounds relating to your particular situation, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

The above stated rights can be exercised in writing and addressed to the COMPANY at the address provided in paragraph 1 or by emailing the data protection officer (dpo) appointed by the company at dpo@eni.com.

Without prejudice to any other administrative or judicial remedy, the data subjects have the right to lodge a complaint with the competent supervisory authority, if they consider that the processing of their personal data infringes their rights in relation to personal data protection. With regard to the European Union, further information about where to send complaints is available at the following link https://edpb.europa.eu/about-edpb/board/members_en.