



Mr. Barnaby Pace
GLOBAL WITNESS
Lloyds Chambers
1 Portsoken Street
London E1 8BT

Ref. n. DIALEG/07/2017
San Donato Milanese, 7th April 2017

Re: OPL 245

Dear Sirs:

We write in response to your letter dated April 5, 2017 regarding Eni's acquisition in 2011 of a stake in OPL 245 in Nigeria.

As you know, Eni has already responded to several communications from your organization concerning this matter. In particular, we make reference to our previous letters dated March 25 and December 18, 2015, and March 31, 2017.

As you are also aware, a proceeding is now pending before the Milan Court against Eni and current and former Eni employees arising out of the OPL 245 transaction. Under the current circumstances, we do not deem it appropriate to debate with you the merits of the pending proceeding or the accuracy of every factual assertion in your letter.

We do, however, note that your letter contains a number of inaccurate statements and mischaracterizations of the record, including, for example, your description of the structure of the acquisition of OPL 245. As we have previously informed you, in 2011, an Eni subsidiary signed a commercial agreement for a new license for OPL 245 with the Federal Government of Nigeria and a subsidiary of Shell. Eni and Shell paid the consideration for this license to the Nigerian government into a federal government bank account. The government in parallel signed different agreements with Shell and Malabu to settle long-standing international litigation over OPL 245. Eni did not sign these additional agreements. None of the contracts relating to the 2011 transaction was executed secretly or designed to "hide" any party's participation.

Eni's filings in the pending proceeding in Milan will set forth the company's position regarding the acquisition of OPL 245. In addition, as noted in our letter of March 31, 2017, for further information about this matter, please refer to the materials regarding OPL 245 available on our



website and, in particular, the press releases issued by the company on December 22, 2016 and February 8 and 22, 2017.

Eni reserves all rights to protect its reputation and that of its managers in response to any statements by Global Witness regarding this matter.

Yours sincerely,


Eni SpA
Legal Affairs Department
Senior Executive Vice President
Marco Bollini