



TotalEnergies Holding UK Limited

MODERN SLAVERY STATEMENT for 2022

*This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the anti-slavery and anti-human trafficking statement made on behalf of its relevant UK registered affiliates (for the purpose of this statement “**TotalEnergies UK**”) for the financial year ending 31 December 2022.*

Introduction

TotalEnergies UK has been present in the United Kingdom for more than 65 years with activities ranging from exploration and production, gas, renewables and power, refining chemicals, trading and shipping and marketing of petroleum products. TotalEnergies UK is ultimately wholly owned by TotalEnergies SE (referred to together with its subsidiaries as “TotalEnergies”), a top tier international energy company with worldwide exploration, production, processing and marketing activities employing more than 100,000 people across in excess of 130 countries. TotalEnergies SE’s shares are listed and publicly tradeable on the Euronext Paris Stock Exchange and the New York Stock Exchange.

TotalEnergies requires high professional standards of behaviour in all its business dealings and has implemented a range of policies, guides and training to ensure these high standards are met. TotalEnergies’ non-financial performance metrics, including actions in support of human rights, are also reported in TotalEnergies’ [Universal Registration Document 2022](#).

In TotalEnergies’ [Human Rights Guide](#) the CEO of TotalEnergies, Patrick Pouyanné, sets out human rights as one of TotalEnergies’ three priority business principles,

“Respect for Human Rights in the workplace for our employees and promotion of these principles in our supply chain, in particular by preventing child and forced labor, avoiding discrimination, observing workers’ rights and by respecting freedom of expression.”

In pursuance of this priority business principle, TotalEnergies UK is committed to prevention of slavery and human trafficking in its own activities and in its supply chain by requiring suppliers to maintain ethical business practices and in particular to prevent slavery and human trafficking in their businesses.

Following the publication of TotalEnergies UK’s Modern Slavery Statement in 2022, we have continued to extend our actions on modern slavery, focusing particularly on identifying modern slavery risks within the business and our supply chain and following up on any risks identified. This statement relates to actions and activities undertaken during the financial year ending 31 December 2022, and we have highlighted some of the actions taken in 2022 by TotalEnergies UK towards the end of this statement.

Implementing our Commitment

TotalEnergies, and TotalEnergies UK implements its commitment to eradicate modern slavery in its business in 4 ways: policies, governance and processes, supply chain and due diligence, and training.

1. Policies

At a corporate level directives and policies exist which apply to all staff. Consistent with International and EU legislation on human rights, TotalEnergies has directives and policies concerning the prevention of modern slavery and guides to educate staff regarding their obligations. These directives and policies are adopted by local subsidiaries so as to ensure consistency across TotalEnergies and maintain TotalEnergies' international reputation.

The relevant policies are set out below.

2. Governance and processes

TotalEnergies' Ethics Committee is responsible for the general oversight of the implementation of the [Code of Conduct](#). The Ethics Committee provides guidance to the business regarding compliance with the Code of Conduct and investigates and addresses any complaints of breaches of the Code of Conduct including with respect to human rights. The Chairwoman of the Ethics Committee of TotalEnergies reports directly to the CEO, Patrick Pouyanné. She also reports regularly to TotalEnergies' Executive Committee and to the Governance & Ethics Committee of TotalEnergies' Board of Directors.

In addition, TotalEnergies UK exploration and production business has an Ethics Committee and an Integrity Committee which is responsible for promoting compliance with and the understanding of the Code of Conduct.

Staff are encouraged to report any possible breach of the Code of Conduct, by "speaking up" through a whistleblowing policy. This can be done in several ways, as set out below.

3. Supply chain and due diligence

TotalEnergies UK engages suppliers of goods and/or services in the UK and abroad. As the oil and gas industry is well established in the United Kingdom, the majority of TotalEnergies UK goods and services are sourced from UK registered companies. TotalEnergies UK's main suppliers are companies which provide them with goods and/or services which support its exploration and production activities. This includes companies that provide goods and/or services for logistics, drilling and well services, and field operations.

TotalEnergies' Code of Conduct requires that our suppliers comply with our [Fundamental Principles of Purchasing](#), make sure that their own suppliers also respect equivalent standards, and require suppliers to pay particular attention to their Human Rights standards including employees' working conditions and those of their suppliers.

Contracts with our suppliers require the contractor to adhere to TotalEnergies' [Fundamental Principles of Purchasing](#) which include provisions regarding respecting human rights at work, as set out below.

4. Training

Training at a corporate level includes online and face to face training programmes to ensure that employees are familiar with the requirements of the [Code of Conduct](#), the company policies and our individual obligations to respect human rights. Additional training is organised at an affiliate level.

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Our Policies and Processes

TotalEnergies' key policies concerning the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking, applied in TotalEnergies UK's operations, are as follows:

- **Code of Conduct** : Respect for Human Rights is one of the core principles to which employees must adhere. Respect for Human Rights includes respect for internationally recognised Human Rights standards, in particular we abide by:
 1. The OECD Guidelines for Multinational Enterprises.
 2. The United Nations Global Compact.
 3. The Universal Declaration of Human Rights
 4. The UN Guiding Principles on Business and Human Rights
 5. The Fundamental Conventions of the ILO.
 6. The Voluntary Principles on Security and Human Rights.

The TotalEnergies Code of Conduct, available in 19 languages, can be found here: [Ethics: We Are Committed To Exemplary Behaviour | TotalEnergies.com](#)

- The **Human Rights Guide**, and **Business Integrity Guide**, provide more detailed guidance on the matters addressed by the Code of Conduct.
- **Fundamental Principles of Purchasing**: suppliers are required to abide by our Fundamental Principles of Purchasing.

The **Fundamental Principles of Purchasing** contains several key principles concerning health, safety and the environment, anti-corruption compliance and other matters, and in particular requires our suppliers to respect human rights at work in compliance with the international standards referred to above.

TotalEnergies UK works with its suppliers to ensure that they comply with the Fundamental Principles of Purchasing and improve their workers' working conditions.

Serious violations by a supplier of TotalEnergies' Fundamental Principles of Purchasing entitle TotalEnergies UK to terminate the contract.

- **Recruitment/Agency workers policy**: TotalEnergies UK companies use their own internal recruitment teams along with selected, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Processes – reporting and audit**: the Code of Conduct specifically encourages employees to “speak up”: that is, to report any instances of non-compliance with the Code of Conduct, including any breaches of human rights.

Employees may report matters of concern to their immediate manager, a Human Resources manager, any other manager, their Compliance Officer, their Ethics Officer or directly to the local Integrity Committee or corporate's Ethics Committee via its helpline ethics@totalenergies.com.

Employees of suppliers to TotalEnergies in the UK, and other external stakeholders, may also contact the Ethics Committee of TotalEnergies to ask questions or report incidents where there is a risk of a breach of human rights. The suppliers and the internal purchasers can also contact the internal supplier mediator using a general email address

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mediation.fournisseurs@totalenergies.com (see: [Trust-based relationships with our suppliers | TotalEnergies.com](#)).

TotalEnergies regularly conducts internal ethical evaluations and human rights assessments of its affiliates, including TotalEnergies UK companies, to ensure that they are complying with the requirements of the Code of Conduct. TotalEnergies also carries out an annual audit of around 200 suppliers who we consider to be at risk and strategic suppliers. The audit covers compliance with human rights requirements.

- **Actions:** TotalEnergies is party to a [global agreement](#) with IndustriALL Global Union, which represents 50 million employees across 140 countries. The agreement provides a formal framework for safeguards and standards at the global level, covering social, environmental and CSR issues such as developing employee dialogue and promoting Human Rights, diversity and workplace safety. A review committee (the “FAIR Committee”) made up of representatives from TotalEnergies and trade unions affiliated with IndustriALL meets annually to assess the implementation of the agreement and identify areas for improvement and actions to be carried out.
- Since 2018, TotalEnergies has been a member of the United Nations Global Compact action platform on Decent Work in Global Supply Chains, and, in this capacity, takes part in various workshops that aim to help the member companies of the Global Compact to make progress in this area.
- TotalEnergies is an active member of IPEICA’s Supply Chain Working Group. TotalEnergies continues to participate in the UN Guiding Principles work group organized by IPEICA, aimed at both oil and gas companies and engineering, procurement and construction (EPC) contractors and contributes to the materials produced by them.

Supply Chain: Due diligence

In the procurement of goods and services, TotalEnergies strives to ensure the prevention of illegal labour through the enforcement of the policies already referred to, engagement with its suppliers, contractual clauses, audits and assessments aimed at ensuring that any supplier guarantees their workforce is suitably competent, trained and employed in full compliance with applicable laws, including the use of foreign employees.

“At risk” suppliers are required to complete a due diligence questionnaire concerning their compliance with TotalEnergies policies, the Modern Slavery Act 2015 and with international standards concerning forced labour and related matters. At corporate level, in line with the Fundamental Principles of Purchasing and TotalEnergies’ Human Rights Roadmap, TotalEnergies has entered into a partnership with a third-party service provider to conduct social and labour rights audits of its suppliers. The audits process is being continuously reviewed with a view to strengthening its value in improving respect for human rights, including the prohibition of forced labour and child labour in the supply chain.

In addition to its internal assessments, TotalEnergies UK utilizes the industry recognized Achilles Pre-qualification Database for supply chain management in its qualification of potential suppliers. For each supplier, registration in the Achilles database involves responding to a due diligence questionnaire in respect of the supplier’s efforts to prevent slavery and human trafficking, including provision of key company policies and documentation in place to support the information provided by the supplier.

Highlighted Actions taken in 2022

In 2020, TotalEnergies UK started a process to update the Fundamental Principle of Purchasing to strengthen its focus on respecting human rights at work and ensuring that working conditions and remuneration of workers are fair, preserve human dignity and are consistent with the principles defined

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by the Universal Declaration of Human Rights and by the fundamental Conventions of the International Labour Organization. This process was ongoing throughout 2022 and will continue in 2023

In December 2022, TotalEnergies UK participated again in the annual TotalEnergies Business Ethics Day held every year to mark the UN International Anti-Corruption Day and Human Rights Day. As part of the Business Ethics Day there was a presentation held by the Ethics officer and an external speaker was invited to talk about ethics in business. As part of the Business Ethics Day TotalEnergies took part in the 2023 Speak Up Campaign, educating personnel on being more vigilant and developing a culture where everyone feels able to raise concerns about the conduct of others working in, with and for the business and to remind all staff to maintain awareness of the TotalEnergies Employee Code of Conduct.

TotalEnergies UK companies are continually striving to improve their awareness of and response to modern slavery issues within each of their businesses. The nature of the business activities for each company within TotalEnergies UK is different but some examples of the actions taken by the relevant TotalEnergies UK companies in 2022 and that are to follow on in to 2023 are as follows:

- In addition to the audit procedures put in place and still in application, some specific services have been identified which pose a greater risk of modern slavery in its supply chain. To mitigate this risk, TotalEnergies UK businesses in the UK contracted a third party to conduct random inspections and interviews of suppliers' personnel in this area of its business when required. This will continue into 2023.
- Mapping and audit of modern slavery and human rights related risks has been carried out by TotalEnergies UK's contract and procurement team and this practice will continue in 2023.
- TotalEnergies defined a new broader audit framework to cover, in addition to social and human rights issues, environmental and climate issues. This will roll out into 2023.
- In addition to the mandatory training for all employees and contractors in TotalEnergies UK on the Code of Conduct, Business Ethics and Anti-Corruption, there is a mandatory Human Rights at Work online training course for all employees and contractors which has a 95% completion rate.
- TotalEnergies has carried out an audit of 430 high risk suppliers in terms of human rights with 200 of those audited in 2022. These audits covered 160,000 people in 77 countries. A 2023 audit plan has been put in place targeting 300 suppliers with a target to achieve 1,300 suppliers audited by the end of 2025.
- A need was identified to create a digital version of the Code of Conduct booklet. This will be rolled out in 2023 and knowledge of the Code of Conduct of personnel will be monitored.
- A supplier qualification tool, SEQUANA has been created and was implemented in May 2023 by TotalEnergies UK which embeds due diligence checks on its supply chain, including human rights.
- TotalEnergies UK considers that vessel provision in the North Sea is a potential risk. Routine suitability inspections are carried out by marine consultancy contractors before any new charter (spot and term) and part of these inspections include MLC compliance, random SEA checks, pay and conditions. These investigations will continue in 2023.

Approval

This statement has been approved by the Board of Directors of TotalEnergies Holding UK Limited.

The Board has authorised a Director, Nicolas Payer, to sign the statement.

Signed
for **TotalEnergies Holding UK Limited**

Nicolas Payer
Director

28 June 2023