

Modern Slavery Statement

1 Introduction

This Modern Slavery Statement is made jointly by TotalEnergies EP Australia S.A.S. (ARBN 112 603 880) (“TotalEnergies Australia”), Total GLNG Australia S.A.S. (ARBN 146 680 524) (“TotalEnergies GLNG”) and TotalEnergies EP Ichthys B.V. (ARBN 160 901 815) (“TotalEnergies Ichthys”), together the Reporting Entities, we, us, our, for the financial year ending 31 December 2021, pursuant to the *Modern Slavery Act 2018* (Cth).

We uphold the commitment to our stakeholders to respect human rights everywhere we operate. This includes:

- Rights at work, through compliance with the fundamental conventions of the International Labour Organization (ILO).
- Rights of local communities, through the implementation of grievance mechanisms in communities that are impacted by our activities.
- Guaranteeing that the measures adopted to ensure the safety and security of our employees and our facilities do not hinder the fundamental freedoms of local community members.

2 Our Structure, Operations, and Supply Chains

2.1 Our Structure

TotalEnergies Australia and TotalEnergies GLNG were incorporated in France as simplified joint stock companies. TotalEnergies Ichthys was incorporated in the Netherlands as a private limited company. The Reporting Entities hold joint venture interests in LNG projects.

TotalEnergies Australia and TotalEnergies GLNG hold interests in joint ventures which develop, produce, liquify, and market gas through the Gladstone LNG Project. TotalEnergies Ichthys holds interests in a joint venture which develops and produces natural gas and condensate, supplying the gas for liquefaction through the Ichthys LNG Project.

The Reporting Entities have affiliates incorporated in France and Australia which also hold interests in the two joint ventures described in this statement; however, TotalEnergies Australia, TotalEnergies GLNG and TotalEnergies Ichthys were the only three entities that met the reporting entity test during the Reporting Period.

2.2 Our Operations

TotalEnergies Australia is the only Reporting Entity which employs personnel in Australia. It has twenty employees which have a finance, accounting, legal or administrative role. Twelve employees are on a permanent basis and eight are on fixed term contracts.

TotalEnergies Australia, TotalEnergies GLNG and TotalEnergies Ichthys do not conduct any oil and gas operations. The activity of these three companies is to hold investments in joint ventures that engage in exploration, development, and production of oil and gas in Australia.

Our participation in joint ventures is set out below:

Ichthys LNG Project

The Ichthys LNG Project is operated by members of the INPEX group of companies. TotalEnergies Ichthys holds minority interests in the upstream joint venture. A member of the INPEX group of companies is the operator which conducts the upstream operations on behalf of the joint venture. An affiliate of the Reporting Entities holds minority interests in the incorporated joint venture vehicle for the downstream activities, Ichthys LNG Pty Ltd. Ichthys LNG Pty Ltd has contracted out the operation of the downstream activities to a member of the INPEX group of companies. INPEX holds the majority interest in both the unincorporated upstream joint venture and incorporated downstream joint venture vehicle.

INPEX Operations Australia Pty Ltd's *Modern Slavery Statement 2021* describes the activities in the upstream and downstream operations of the Ichthys LNG joint venture. In summary, the project is in the production stage and produces 8.9 million tonnes per annum (mtpa) of LNG, 1.65 mtpa of LPG and more than 100,000 barrels of condensate per day at peak.

Gladstone LNG Project ("GLNG Project")

The development and production of gas in the upstream joint ventures of the GLNG Project is conducted by members of the Santos group of companies. TotalEnergies GLNG holds a minority interest in the joint venture vehicle, GLNG Operations Pty Ltd, which was incorporated to operate the liquefaction facilities and assist with the joint marketing of the gas on behalf of the GLNG Project participants. GLNG Operations Pty Ltd contracts out procurement services from the Santos group of companies.

Santos' modern slavery statement describes the activities in the upstream and downstream operations of the GLNG Project. In summary, the GLNG Project was one of the world's first coal seam gas to LNG projects. The LNG is sold into Asian markets, with some natural gas also sold into the east coast domestic market. GLNG has two LNG trains at Gladstone with a combined capacity of 8.6 mtpa. Feed gas is sourced from the project's own upstream production as well as from other gas producers.

2.3 Supply Chain

The Reporting Entities have a limited supply chain by virtue of our role as investors. Our supply chain involves the procurement of professional services such as auditors and lawyers as well as IT and telecommunications services. These services are generally not procured directly but are procured by other members of the TotalEnergies Group which then share these services amongst the relevant members of the TotalEnergies Group including the Reporting Entities.

The Reporting Entities rely on the description of the supply chains of the joint ventures as articulated by the operators. A snapshot of the joint venture supply chains as described in the modern slavery statements of INPEX and Santos is set out below.

Ichthys LNG Project

The operator of this joint venture procures:

- services such as engineering, fabrication, construction, drilling, maintenance, Information Technology (IT), HR, labour and cleaning; and
- materials, equipment, and logistics such as fuels, chemicals, pipes, IT hardware, valves and laboratory, industrial, drilling and electrical equipment.

The suppliers of the abovementioned goods and services are predominately based in Australia, but in some instances, goods are sourced internationally from countries including India, United Kingdom, Italy, France, Netherlands, Japan, and Germany.

GLNG Project

The operator of this joint venture procures:

- services relating to building, construction, fabrication, maintenance, wellsite, logistics and transport, catering and hospitality, labour hire, waste management, real estate and facilities management, security, corporate support, operations support including remote accommodation; and
- consumables and materials, drilling process and wellhead equipment, maintenance spares and ICT hardware.

The suppliers of the abovementioned goods and services are predominately based in Australia, but in some instances, goods are sourced from the United States, Canada, United Kingdom, Singapore, Thailand, Denmark, Netherlands, Norway and Hong Kong.

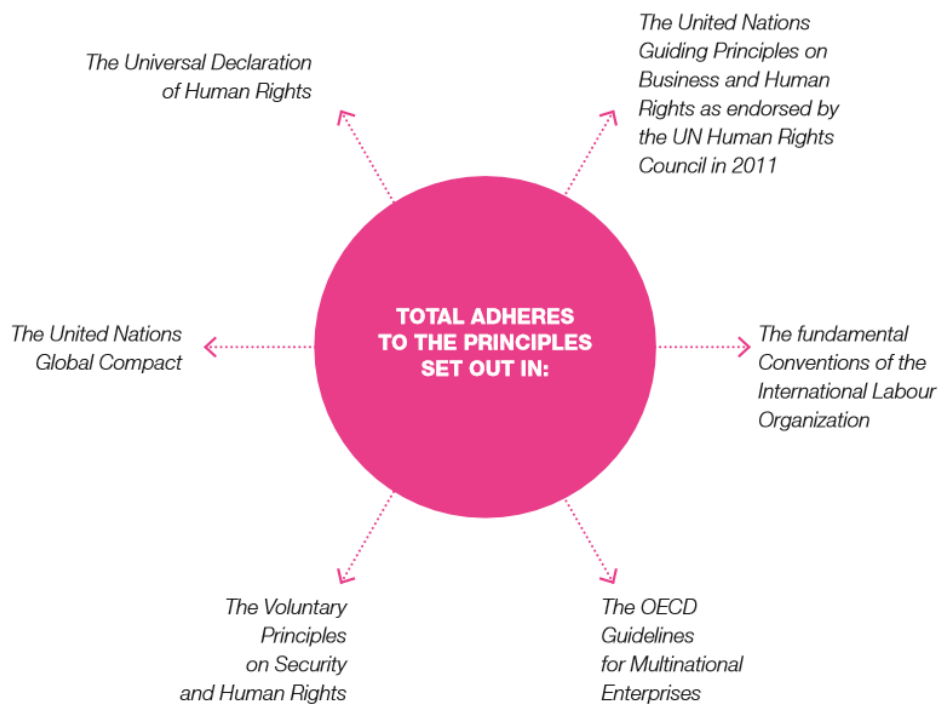
3 Modern Slavery Risks in Our Operations and Supply Chains

Given the nature of the roles and protections provided to employees of TotalEnergies Australia, and in the absence of a significant supply chain, TotalEnergies Australia, TotalEnergies GLNG and TotalEnergies Ichthys have low modern slavery risks. However, modern slavery risks may exist in the minority investments held by the Reporting Entities. Accordingly, the Reporting Entities rely on the description of modern slavery risks as articulated by the joint venture operators in their respective modern slavery statements.

The risk of modern slavery in the operations of both joint ventures were assessed to be low. Higher risk categories of procurement were found in both joint ventures relating to building, construction, fabrication, maintenance services, consumables, materials, logistics, labour hire, cleaning, ICT hardware, catering and hospitality, facilities management, and security services.

4 Actions to Address and Assess Modern Slavery Risks

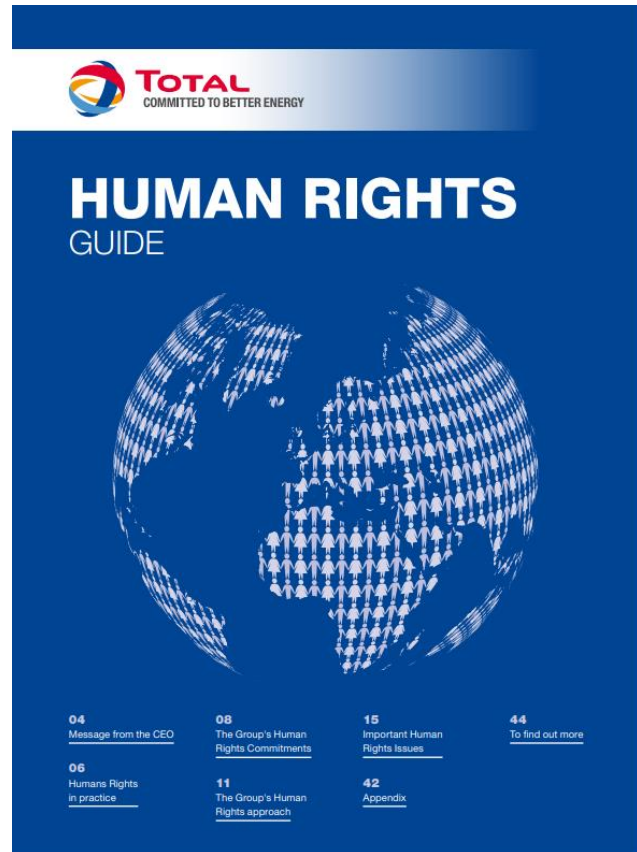
TotalEnergies addresses modern slavery and human rights risks. An overview of the international principles we adhere to on a global level is set out below:



TotalEnergies's global approach to demonstrating respect for human rights in the workplace and supply chain is articulated in the *Code of Conduct*.¹ The *Code of Conduct* forms part of our global approach, together with the *Human Rights Guide*,² *Universal Registration Document for 2021*,³ *Fundamental Principles of Purchasing*,⁴ Group Charter, Directives, Rules, Guides, and Manuals. Many of these documents highlight our approach to human rights, including the ways in which we, at a global level, assess and address modern slavery risks in our operations and procurement activities.

Human Rights Training

An online module on human rights in the workplace with a focus on respecting the International Labour Organization's core conventions has been accessible to all employees since 2019 in all countries in which TotalEnergies operates. It is available so far in five languages and is part of the onboarding process for new TotalEnergies Australia staff. More than 35,000 management-level employees (job level 10 or higher) had taken this module at year-end 2021.



Other specific training programs tailored to issues encountered on the ground were held throughout 2021, in particular: annual training in ethics and human rights for newly appointed senior executives; and a webinar on the respect for human rights in the context of joint ventures was held for employees in charge of managing participations in the Exploration & Production segment. It brought together 90 participants from around the world.

Ethics Committee and Responsibility

Since 2001, the Ethics Committee has been responsible for monitoring the application of our *Code of Conduct*. The Ethics Committee is comprised of representatives of all TotalEnergies' business segments. Importantly, it is also responsible for supporting and advising TotalEnergies' employees and stakeholders and for listening to their concerns. Patrick Pouyanné, Chairman and Chief Executive Officer, promotes our daily responsibility to ethics in his address to staff by saying that:

*Each and every one of you has a responsibility to be familiar with our Code of Conduct, practice it in your day-to-day activities and convey its values in your dealings with those who work with and for us. If, in the performance of your duties, you are confronted with a difficult decision or you suspect a violation of the rules set out in this document, the Ethics Committee (ethics@totalenergies.com) is available to help you in the strictest confidentiality.*⁵

¹ TotalEnergies, *Code of Conduct* (2021)

<https://totalenergies.com/sites/g/files/nytnzq121/files/atoms/files/total_code_of_conduct_va_0.pdf>.

² TotalEnergies, *Human Rights Guide* (2015)

<https://www.totalenergies.com/sites/g/files/nytnzq121/files/atoms/files/human_rights_internal_guide_va.pdf>.

³ TotalEnergies, *Universal Registration Document 2021* (2021)

<https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-05/TotalEnergies_URD_2021_EN_accessible.pdf>.

⁴ TotalEnergies, *Fundamental Principles of Purchasing* (2022)

<https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-05/Brochure_Fundamental_Principles_of_Purchasing.pdf>.

⁵ TotalEnergies, *Code of Conduct* (2021), 3.

The Ethics Committee provides a mechanism for stakeholders to voice their concerns regarding potential slavery risks. Its key role is one of listening and support. Employees, but also people from outside the Company, can contact the committee. The Committee protects the confidentiality of the complaints, which can only be lifted with the agreement of the complainant. The Chairwoman of the Ethics Committee presents an annual report on the Committee's ethics-related activities to the Governance and Ethics Committee of the Board of Directors.

In 2021, the Ethics Committee received close to 140 reports (internal, external, anonymous) regarding compliance with the *Code of Conduct*. Close to 60% of those reports were about questions related to human resources. All received reports are addressed and, when necessary, recommendations are made in order to lead to the implementation of corrective actions. The Human Rights Department and the Ethics Committee rely on the network of more than 100 Ethics officers across the countries in which the Company operates, including one in Australia. They are in charge of promoting the values set out in the Code of Conduct among employees working at subsidiaries and ensuring that the Company's commitments are correctly implemented at a local level.

The Human Rights Department

The Human Rights department in the Sustainability & Climate Division coordinates the analysis of the Company's human rights risks, supports operational teams, and supervises the actions to promote respect for human rights, in close collaboration with the Ethics Committee and in accordance with the Company's *Code of Conduct*.

Raising Supplier Awareness

Every two years, TotalEnergies Global Procurement organises a Suppliers Day which brings together the Company's strategic suppliers. Given the health context of the last two years, it was not possible to hold this event. The commitment of suppliers to Corporate Social Responsibility ("CSR") aspects is now taking a new form. In 2021, TotalEnergies sent a letter to the 1,000 suppliers accounting for 80% of supply chain emissions to inform them of the launch of a supply chain climate initiative. In December 2021, the first webinar introducing the initiative was attended by more than 500 suppliers. In 2022, the Company plans to set up a digital platform to coordinate this community of suppliers and to extend the program to all the topics of the sustainable procurement roadmap.

Supplier Evaluation and Improvement Monitoring System

TotalEnergies evaluates supplier performance on sustainability in several ways. First, the Company ensures that suppliers adhere to its *Fundamental Principles of Purchasing*, which must be signed by the supplier at the time of qualification and are included in the contracts. During the qualification process, the supplier answers a CSR questionnaire that conditions its ability to work with the Company. Subsequently, effective compliance with the *Fundamental Principles of Purchasing* is verified through assessments such as the on-site human rights audits conducted each year by an external service provider on behalf of the Company. Whenever necessary, an action plan is put in place and followed by the teams, allowing improvement of the supplier's practices to be attested. The Company is also assessing the maturity of its suppliers as it did in 2021 on the subject of climate: a maturity assessment questionnaire has been sent to the Company's Top 200 suppliers. From 2022 onwards, this assessment will be carried out regularly on the Top 1,000 suppliers in parallel with the deployment of the supplier commitment program on the climate issue, in order to measure the impact of this program on supplier practices.

2024 CSR Audit Target

The prevention of risks relating to working conditions, especially forced and child labour in the supply chain, is a major area of concern and one of TotalEnergies' commitments. For all its activities, TotalEnergies has set itself the target of auditing 100% of its at-risk suppliers and 100% of its strategic suppliers by 2024. These at-risk suppliers are identified on the basis of the mapping of country-related risks and the mapping of CSR-related risks. The audits are carried out on site and include interviews with employees. Suppliers with non-conformities must present an action plan, the implementation of which is monitored with internal teams.

The Application of TotalEnergies' Global Approach to the Reporting Entities

Our *Code of Conduct* applies whenever we control a joint venture. In other situations, we make ongoing efforts so that the partner who controls the joint venture applies equivalent principles.

In respect to the Ichthys LNG Project, INPEX Australia's Modern Slavery Statement is due for release by 30 June 2022. The joint venture committee has continually engaged the topic at meetings with the view of incorporating learnings over the past year, and we have reviewed and commented on the statement.

With respect to the GLNG Project, we have reviewed the Modern Slavery Statement released by the Santos Group of Companies as operator of the upstream joint ventures for the GLNG Project and as providing procurement services to the operator of the downstream facilities of the GLNG Project.

5 Assessing the Effectiveness of Our Actions

The Reporting Entities are committed to achieving year-on-year improvement in our approach to assessing and addressing modern slavery risks. During the second reporting period, we sought to assess our joint ventures having regard to our *Code of Conduct* and engage with our business partners on modern slavery risks where necessary. This was achieved through the review of the procedures and rules of the Operator and several meetings with them throughout the course of the year.

With regard to the Ichthys LNG Project, the operator (INPEX) has initiatives which are not dissimilar to our own. These include employee training, establishment of a dedicated working group, supplier due diligence across multiple stages of the sourcing and procurement process, whistle-blower hotline and grievance mechanisms with reach of INPEX employees and the workforce of key suppliers, and human rights surveys with Operators of INPEX's non-operated assets. Such initiatives have shown outcomes whereby in 2020 no suppliers were found with indications of human rights violations or modern slavery risks. Therefore, we have a reasonable basis to believe that our partner in this venture (who is the operator of the joint venture), applies principles that are in line with our global approach to the risk of modern slavery.

With respect to the GLNG Project, the operator (Santos) has a similar whistle blower hotline, code of conduct (including an ethical conduct clause), code of conduct training, and supplier engagement program. In 2021 they planned to build upon efforts of the previous year by continuing to roll out supplier surveys, desk-top supplier assessments for their Tier 1 suppliers (highest risk/highest spend in direct contracts); assess known Tier 2 suppliers (key subcontractors of their Tier 1 suppliers) against modern slavery risk indicators; work with joint venture partners to review risks in international operations; expand their supplier engagement and communications strategy and conduct engagement and awareness-raising initiatives with high risk Tier 1 suppliers on an ongoing basis; and deliver modern slavery risk management training to staff. As partners in the joint venture project we were updated at operational committee meetings regarding the operator's efforts to minimise the risk of modern slavery. As at the time of this submission, the operator has not represented any adverse finding in the rollout of its plan, therefore, we have a reasonable basis to believe that the operator is performing its operations within the plan it has set for itself.

During the third reporting period, we will review and update our contractual terms upon renewal of each contract and assess in further detail the *Code of Conduct* of the operators of our projects in light of our own *Code of Conduct* and continue to engage with our business partners on modern slavery issues.

6 Consultation Process and Approval

The Reporting Entities engage formally with the operators of the Ichthys LNG Project and GLNG Project through the Operating Committees and Board of Directors meetings. There have been regular updates and discussions at these meetings on modern slavery.

This Statement has been approved by the Board of Directors of the Reporting Entities.

Signed:

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