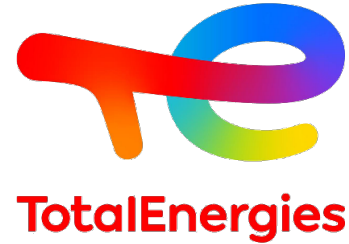


TotalEnergies Australia

Modern Slavery Statement 2022



1 Introduction

This Modern Slavery Statement 2022 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 2022, 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* including compliance with fundamental conventions of the International Labour Organisation (ILO). TotalEnergies has been a member of the ILO's Global Business and Disability Network for four years, with a commitment to promoting five key principles in the [Charter](#).
- *Rights of Local Communities* including implementation of grievance mechanisms in communities that are impacted by our activities as stipulated in the [Human Rights Guide](#). We acknowledge the footprint of our activities in the countries where we work and place special attention to promote the rights of those within our vicinity. We operate with a guarantee 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.
- *A Code of Conduct* regulated by TotalEnergies' Ethics Committee with the goal to meet the most stringent integrity standards, and to protect human health and the environment as a pillar of our responsible development strategy. The Code of Conduct can be downloaded via this website [link](#) of TotalEnergies S.E. (societas Europaea) (“the Parent Company” or “the Company”). In accordance with our Code of Conduct, the Company has adopted formalised [principles](#) concerning safety, security, health, the environment, quality and societal commitments.

2 Structure, Operations, and Supply Chains

2.1 Structure of Reporting Entities

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. As of the date of submission for this report, TotalEnergies EP Ichthys B.V. is in the process of transferring its interests to TotalEnergies EP Ichthys Pty Ltd. TotalEnergies EP Ichthys Pty Ltd is a wholly owned subsidiary of TotalEnergies S.E., a public company registered in accordance with the corporate law of the European Union.

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. As of June 2023, TotalEnergies Australia has twenty employees distributed across financial, accounting, legal and administrative roles. Twelve employees are on a permanent basis and eight are on fixed term contracts.

The Reporting Entities 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 participations in joint ventures are set out below:

Ichthys LNG Project

The Ichthys LNG Project is an incorporated joint venture company registered as Ichthys LNG Pty Ltd (ACN 150 217 299), operated by INPEX Operations Australia Pty Ltd (ACN 150 217 262) ("INPEX Operations Australia"). INPEX Ichthys Pty Ltd (ACN 150 217 253) holds majority participating interest in the Ichthys LNG Project of 66.245%.

TotalEnergies Ichthys is a special purpose vehicle incorporated to hold TotalEnergies' interest in the upstream part of the Ichthys LNG Joint Venture Project. TotalEnergies Ichthys holds the largest minority participating interest of 26%. 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 2022 describes the activities in the upstream and downstream operations of the Ichthys LNG joint venture. The project has been in production since 2018 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 GLNG Project comprises five (5) fields, namely Fairview, Roma, Arcadia, Comet Ridge, and Scotia. Some of these fields span across multiple permits. Depending on the field and permits involved, the GLNG Project consists of several unincorporated joint ventures. The development and production of gas in these upstream joint ventures are carried out by members of the Santos group of companies. TotalEnergies GLNG holds multiple participating interests in various joint venture vehicles. The operators of the Gladstone LNG Project vary among Santos CSG Pty Ltd, Santos TOGA Pty Ltd, Santos Ventures Pty Ltd, and Bronco Energy Pty Ltd, depending on the specific unincorporated joint venture.

GLNG Operations Pty Ltd (ACN 132 321 192) ("GLNG Operations") is an incorporated joint venture established to operate the liquefaction facilities downstream and assist with the joint marketing of the gas on behalf of the GLNG Project's joint venture participants. GLNG Operations contracts out procurement services from the Santos group of companies. TotalEnergies GLNG has a participating interest of 27.5% in GLNG Operations.

Santos' modern slavery statements describe 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. Santos holds a 30% interest in GLNG Operations. The project consists of two LNG trains, which have a combined capacity of 8.6 million tonnes per annum (mtpa). Train 1 began production in September 2015, followed by Train 2 in May 2016. The feed gas for the project is sourced from GLNG's upstream fields, as well as from Santos' gas portfolio and third-party sources.

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, lawyers, 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 in their respective Modern Slavery Statements. A snapshot of the joint venture supply chains as described by INPEX and Santos is set out below.

Ichthys LNG Project

The operator, INPEX Operations Australia, procures from suppliers:

- *services* such as engineering, fabrication, construction, drilling, maintenance, Information Technology (IT), HR, labour and cleaning; and
- *products* including 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. Accordingly, INPEX manages its risk exposure to modern slavery through a due diligence processes which now includes assessment of the Global Slavery Index (GSI), mapped against the geographic location of their operations. In a recent assessment in 2022, INPEX discovered five suppliers out of their 450 contracts which show potential risk of modern slavery. As a result, INPEX ensured the five suppliers are to be a focus for further due diligence process in 2023, along with any other contractors that fall within this category, underpinned by the GSI. More information on this can be found in INPEX's Modern Slavery Report for year ending 2022.

GLNG Project

The operators of the multiple joint ventures procure from suppliers:

- *services* pertaining 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
- *products* including 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.

In terms of potential modern slavery risks, specific areas of concern for the Queensland and NSW businesses include expenditure related to logistics and construction categories. These areas are identified as potential risk areas due to the complex and often global nature of supply chains involved in these sectors. To mitigate these risks, Santos and its partners implement robust policies, conduct thorough due diligence on suppliers, and ensure adherence to ethical and responsible practices throughout the supply chain. More on the above implementation measures can be found in Santos' Modern Slavery Report 2022.

3 Modern Slavery Risks in Operations and Supply Chains

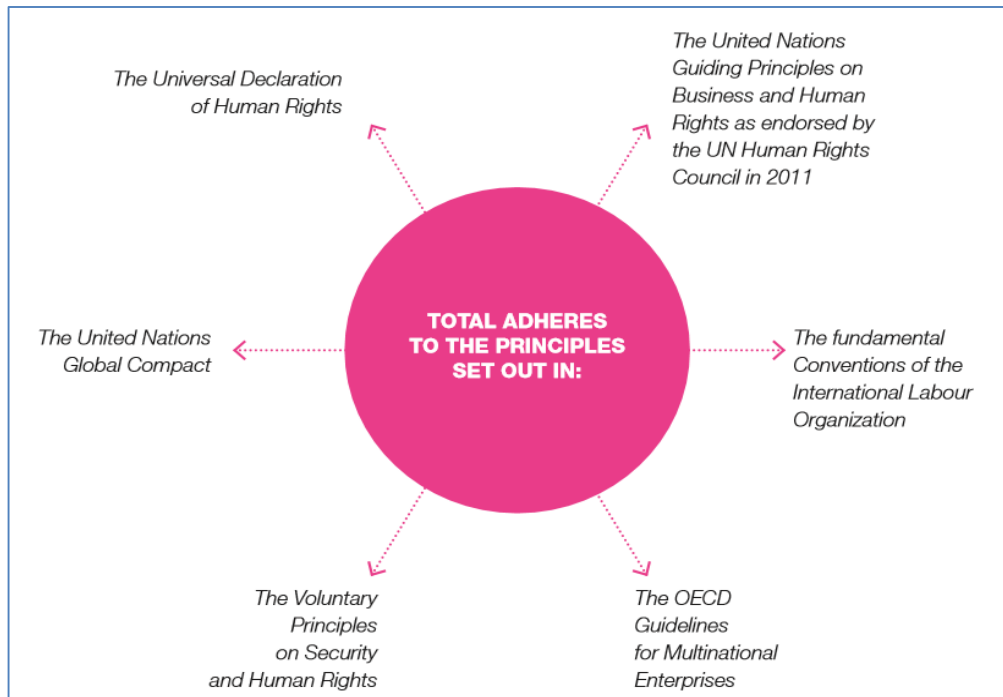
Given the nature of the roles and protections provided to employees of TotalEnergies Australia, and in the absence of a significant supply chain, the Reporting Entities have low modern slavery risks. However, modern slavery risks may exist in the minority participating interests held by the Reporting Entities. Accordingly, the Reporting Entities rely on the description of modern slavery risks as articulated by the joint venture operators, INPEX and Santos, in their respective modern slavery statements for 2022.

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 2022*,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.



¹ TotalEnergies, *Code of Conduct* (2022)

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

² TotalEnergies, *Human Rights Guide* (2015)

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

³ TotalEnergies, *Universal Registration Document 2022* (2022)

<https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-03/TotalEnergies_URD_2022_EN.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>.

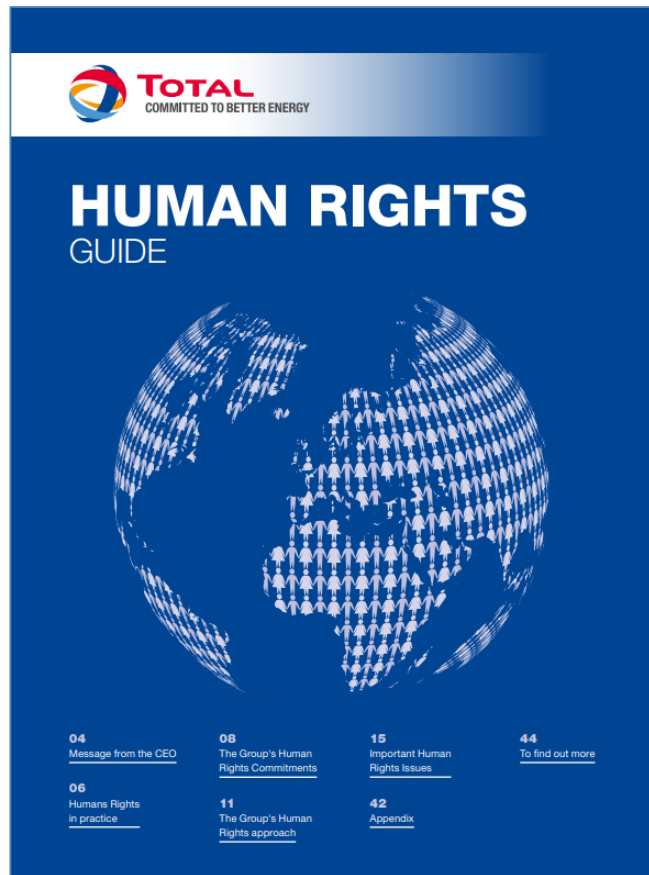
Human Rights Training

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. As of 2022, the Company has joined the International Labour Organization's Child Labour Platform, a multi-sector initiative to combat child labour.

The online training module is available so far in five languages and is part of the mandatory onboarding training process for new TotalEnergies Australia staff. More than 35,700 management-level employees (job level 10 or higher) had taken this module at year-end 2022.

Onsite, the Company emphasises training to explain, anticipate and prevent human rights risks. More than 2,050 employees participated in physical classroom training in 2022.

Other specific training programs tailored to issues encountered on the ground were held throughout 2022, 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.



Anti-Corruption Training

Significant progress has been made in 2022 by the Company in its fight against corruption and in raising awareness of anti-corruption principles. As part of these efforts, several initiatives have been implemented:

- In Australia, the company has 360 Compliance Officers stationed worldwide who receive regular training. They have enhanced their code of conduct by including practical examples of prohibited behaviors.
- To strengthen anti-corruption measures, a new online training course was launched in mid-2022, replacing two existing courses. Over 82,000 employees had previously taken the old courses, and so far, more than 38,000 employees have completed the new course. This updated training aligns with the company's increased awareness and understanding of corruption.
- Risk assessments were conducted by the Chief Compliance Officer's team at high-risk affiliates, with over 15 assessments carried out. Partner organizations specializing in financial data analysis were involved in these assessments.
- In terms of incidents related to fraud, corruption, or influence peddling, slightly over 200 cases were identified. Out of these incidents, disciplinary actions were taken against around 130 employees, with most cases resulting in dismissal.

Although specific incidents of corruption related to modern slavery have not been reported, the Company's robust internal governance structure positions it well to detect and address any such issues before they escalate. Mitigative measures are in place to ensure the severity of issues remains manageable. Through these proactive measures and a focus on internal governance, the Company strives to combat corruption effectively and maintain a strong stance against modern slavery.

Ethics Committee and Responsibility

Since 2001, the TotalEnergies Ethics Committee (“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 to listen to their concerns. Patrick Pouyanné, Chairman and Chief Executive Officer, promotes our daily responsibility to ethics in his address to staff found in the *Code of Conduct*, by stating:

*“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

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.

From an internal data analysis performed on ethical complaints in 2021, the Ethics Committee reported receiving 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 implement 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. The Ethics officers are in charge of promoting the values set out in the Code of Conduct among employees working in subsidiaries and ensuring that the Company's commitments are correctly implemented at a local level.

The *Collection and Processing of Ethical Complaints*⁶ procedure published internally and on the TotalEnergies website since December 2022, formally sets out the existing approach for collecting and processing complaints sent to the Ethics Committee by internal or external stakeholders concerning behaviours or situations contrary to the Code of Conduct. It ensures that the identity of the person making the report is protected, rules out any reprisals against them or against those taking part in the processing of the complaint, and respects applicable laws and regulations in terms of protecting personal data.

By the end of 2022, all entities within the Exploration & Production (the Reporting Entities fall under this category), Refining & Chemicals, and Marketing & Services segments of the company's operations that were active in 2022 had either implemented or enhanced their grievance management system. This represents an improvement compared to 99% in the previous year.

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*. As of 2022, 100 subsidiaries of the Company have an integrated grievance mechanism associated with human rights issues.

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. TotalEnergies launched *TotalEnergies Supply Chain Carbon Footprint*

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

⁶ Collection and Processing of Ethical Complaints (2020)
< https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2020-12/Regle_Recueil_et_traitement_des_signalements_VEN.pdf>.

*Initiative*⁷ 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. By mid-2022, TotalEnergies launched a sustainability platform to engage its 1,000 suppliers in a sustainability program with a specific focus on climate. This platform allows TotalEnergies to manage joint projects on climate, assess suppliers and track their action plans.

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. In 2022, 200 priority supplier audits were performed to measure the supplier's adherence to the fundamental principles of human rights, pursuant to *Fundamental Principles of Purchasing*.

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 (five on-site audits were performed 2022). 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 in 2022 about climate, with a maturity assessment questionnaire has been sent to the Company's Top 200 suppliers. Moving forward, 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, the mapping of CSR-related risks and other global indexes which contribute to high risk. 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. This target is managed by the Company's Strategy & CSR Committee which had quarterly meetings in 2022 with 100% attendance rates.

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 2023. 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.

⁷ CDP - TotalEnergies - Climate Change (2022)

<https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-08/CDP_Climate_Change_2022.pdf>.

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 strong 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. Furthermore in 2023, INPEX has formalise their governance framework, specifically to include emphasis on modern slavery risk and its management. Hence, there will be increased senior management oversight on this issue for their joint venture projects.

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. Santos builds 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.

We are continuing to 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.

In 2023, TotalEnergies will continue to review and update our policies as required to reflect the changing legislative landscape and enhanced modern slavery risk management processes and human rights due diligence expectations.

6 Consultation Process and Approval

The Reporting Entities maintain formal engagement with the operators of the Ichthys LNG Project and GLNG Project through Operating Committees and Board of Directors meetings. Within these meetings, regular updates and discussions on the topic of modern slavery have taken place.

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

Signed:

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