



Chairman of the Board

Chief Executive Officer

Paris, December 17<sup>th</sup> 2021

### **TotalEnergies company's Advocacy Directive**

**This directive applies to all entities and subsidiaries held by TotalEnergies SE, in accordance with their respective decision-making rules.**

TotalEnergies is a major multi-energies player on the international scene, present in over one hundred and thirty countries and strong due to the commitment of more than one hundred thousand people, from a wide range of origins, professions, and know-how. Today, the corporation is a player that has to interact not only with the various representatives of the economic world but also with the local populations in the areas in which it is established as well as with the public authorities. As such, the corporation plays an active role in the public debate.

Aware of its responsibility in all the countries and territories in which it is present, TotalEnergies carries out its advocacy efforts in accordance with the values set out in its Code of Conduct, which clearly affirms its ethical commitment. By advocacy, the Company means all efforts conducted directly or indirectly with public authorities, and more generally with all stakeholders concerned by its activities, in order to present its challenges, explain its issues, share its expertise and promote its interests. The Company's advocacy efforts are carried out in accordance with this directive, which cannot be waived under any circumstances.

This directive applies to all the Company's employees who are involved in advocacy efforts, particularly within the Public Affairs Department. This Department acts as a link between the Company and its institutional stakeholders: government agencies, elected officials, major international organizations, and professional associations. It works in conjunction with the Country Chairs located in countries where TotalEnergies SE has one or more subsidiaries. The latter are regularly informed of the Company's positions on the issues concerning them, particularly through the internal news agency.

The role of employees who carry out advocacy efforts is to provide technical expertise with local knowledge in the corporation's areas of activity, to express the Company's point of view on the development of the regulatory or legal framework, both in France and abroad, and to promote the Company's activities. Their objective is to inform the public authorities and interested stakeholders about the context and consequences of their decisions on the Company's activities and, more broadly, on the energy sector.

These advocacy efforts are not only aimed at institutional players but at all stakeholders concerned by TotalEnergies' activities. Advocacy includes raising awareness of the Company's challenges, in order to develop understanding and acceptability of its activities with all stakeholders. This is not only about

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promoting the Company's image, but also about facilitating the development of its activities in France and abroad.

This directive is widely distributed within the Company and published on the intranet website of TotalEnergies.

**The Company implements the following rules in conducting its advocacy efforts:**

- Reject and fight corruption in all forms, whether public or private, active or passive, direct or indirect. TotalEnergies is committed to promote best practices with regard to transparency and the fight against corruption within its domain of activity;
- Refuse to intervene in the functioning or financing of the political life in the countries in which it is present;
- Respect the principle of free competition;
- Convey messages to the authorities that are consistent with its stated positions and strategies and be transparent about such messages, whether they are positive or defensive, notably with regard to the Company's support for the objectives of the Paris Agreement relating to the fight against climate change;
- Publish on its website the names of the professional associations to which it belongs;
- Ensure the consistency between its positions stated publicly and those taken through its advocacy efforts, whether directly or indirectly through professional associations, particularly with regard to the Company's support for the objectives of the Paris Agreement relating to the fight against climate change. In the specific case where, on any given topic, the positions stated publicly by TotalEnergies differ from those advocated by any professional association to which it belongs, the position stated by TotalEnergies will prevail;
- Within its areas of competence, provide public officials and authorities, with relevant expertise based on reliable information;
- Regarding the fight against climate change, promote the following principles that guide the effort and the strategy of the Company:

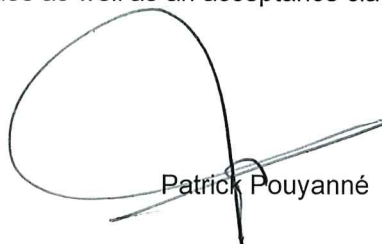
1. TotalEnergies recognizes the link established by science between human activities, in particular the use of fossil fuels, and climate change.
2. TotalEnergies recognizes the Paris Agreement as a major step forward in the fight against global warming and supports the initiatives of the implementing States to achieve the objectives of this agreement.
3. TotalEnergies supports the implementation of carbon pricing.
4. TotalEnergies supports policies, initiatives and technologies aimed at promoting the development of renewable energies and sustainable bioenergies (biofuels, biogas) as well as energies and technologies aimed at decarbonizing industrial processes and transport, such as hydrogen, carbon capture or the electric vehicle.
5. TotalEnergies promotes the role of natural gas as "transition fuel", in particular as a replacement for coal. TotalEnergies supports policies aimed at measuring and reducing methane emissions to move towards the ambition of Zero Methane emissions. TotalEnergies promotes a policy of reducing greenhouse gas emissions: avoid - reduce by using the "best available technologies" - offset residual emissions thus minimized.
6. TotalEnergies supports the carbon offset mechanisms necessary to achieve carbon neutrality, through organized and certified markets ensuring the quality and sustainability of carbon credits.

**In their advocacy efforts, employees must:**

- Comply with the applicable laws and regulations in the countries in which they are, as well as the relevant industry's best practices in this area;
- Comply with the Code of Conduct, this directive as well as all the rules of the Company's Anti-Corruption Compliance program and more specifically those relating to invitations and gifts which require, beyond a certain amount, the prior managerial approval;
- Register, where they exist, in the advocacy registers of the institutions in which they carry out advocacy efforts;
- Clearly indicate to stakeholders that the advocacy effort is being conducted on behalf of TotalEnergies;
- Provide information and contributions that comply with the Company's values without leading public officials and authorities to expect any form of compensation;

*The terms "TotalEnergies", "TotalEnergies company" or "Company" in this document are used to designate TotalEnergies SE and the consolidated entities that are directly or indirectly controlled by TotalEnergies SE.*

- Act to defend the legitimate interests of the Company, while ensuring the fairness of their actions and without seeking to obtain an undue interest;
- Demonstrate integrity and intellectual probity in dealings with public officials and authorities and other stakeholders, and protect the confidentiality of the information provided;
- Respect the freedom of decision, judgment and opinion of public officials and other stakeholders;
- Ensure that any contract concluded with third parties carrying out advocacy efforts on behalf of TotalEnergies SE includes an anti-corruption clause as well as an acceptance clause of this directive.



Patrick Pouyanné