

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** TotalEnergies  
**Sector** Extractives  
**Overall score** 33.3 out of 100

Theme score	Out of	For theme
2.8	10	A. Governance and Policy Commitments
8.4	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
13.2	25	D. Performance: Company Human Rights Practices
5.4	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policy Commitments (10% of Total)**

**A.1 Policy Commitments (5% of Total)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Universal Declaration of Human rights (UDHR): The Code of Conduct indicates: 'Total Energies complies with [...] The Universal Declaration of Human Rights'. [Code of Conduct, 2021: <a href="https://www.totalenergies.com">totalenergies.com</a> ] Score 2 • Met: Commitment to UNGPs: The Code of Conduct indicates: 'Total Energies complies with [...] The United Nations Guiding Principles on Business and Human Rights'. [Code of Conduct, 2021: <a href="https://www.totalenergies.com">totalenergies.com</a> ]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Code of Conduct indicates: 'Total Energies complies with [...] The principles set forth in the fundamental conventions of the International Labour Organization (ILO)'. [Code of Conduct, 2021: <a href="https://www.totalenergies.com">totalenergies.com</a> ] • Met: Explicitly lists all four ILO core principles: The Code of Conduct indicates: 'We take the necessary steps to ensure decent working conditions not only at our own sites, but also those of our high-risk suppliers. In particular, this includes a prohibition on forced labor and child labor, a commitment to non-discrimination and freedom of association'. It adds: 'We are careful to create working conditions that show respect for people and that allow for freedom of association and collective bargaining'. [Code of Conduct, 2021: <a href="https://www.totalenergies.com">totalenergies.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to ILO core principles: The Fundamental Principles of Purchasing indicates: 'Suppliers are required to comply with [...] applicable laws, as well as principles equivalent to those set forth in [...] the fundamental Conventions of the International Labour Organization'. It adds: 'We therefore require all suppliers of goods and services to comply with these principles and ensure compliance by their own suppliers in turn'. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for BPs/JVs: The Fundamental Principles of Purchasing has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for the right to freedom of association and collective bargaining, it notes: 'Allow workers to choose whether to be member of a collective bargaining organization. In countries where such right is restricted, ensure employees have the right to participate in a dialogue about their collective work situation'. As indicated above, the principles of purchasing includes all suppliers of services too. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Code of Conduct indicates the 'Company Commitment Regarding [...] Personal health and safety: We strive to protect personal health and safety and to assist employees in protecting their colleagues through training and awareness initiatives'. The SHE Charter states that 'TotalEnergies complies with all applicable laws and regulations wherever it conducts its business and supplements them with specific requirements and commitments when necessary [...] TotalEnergies implements, for all of its operations, appropriate management policies regarding safety, security, health, the environment, quality, societal commitment and a periodic risk assessment of relevant policies and measures'</li> <li>[Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Safety Health Environment Quality Charter, 2014: <a href="https://total.com">total.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Guide indicates: 'Human Rights and labor issues at stake in the workplace are decent working conditions and remuneration, [...] working hours, rest and parental leave [...]'. However, although the Company acknowledges that working hours is an issue, no evidence found of the Company having a policy statement (placed in a formal policy) explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>] &amp; [Human Rights Briefing Paper, 2016: <a href="https://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to H&amp;S of workers: Regarding health and safety at work, the Fundamental Principles of Purchasing indicates it expects suppliers to 'Provide a healthy and safe workplace where workers are protected from accidents, injuries, and work-caused illness. When accommodation is provided by the employer, ensure that it is safe, clean and adequate as a living space'. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The Fundamental Principles of Purchasing indicates it expects suppliers to 'ensure compliance with a maximum number of working hours, adequate rest time and parental leave'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. The Company has provided an additional source where it includes details on its pre-qualification process and supplier assessment. It also indicates that, as it is stated in its Code of Conduct: 'Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards'. However, the Code does not seem to contain provisions on working hours. The 2022 Universal Registration Document, provided by the Company, indicates: 'The average work week [of employees] is determined in accordance with applicable local laws and limits set by International Labour Organization (ILO) conventions'. However, this subindicator looks for evidence that it expects suppliers to formally commit to respecting the ILO conventions on working hours. Only policy commitments are considered a suitable source for this indicator under CHRB</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			revised approach. [Fundamental Principles of Purchasing, N/A: <a href="http://totalenergies.com">totalenergies.com</a> ] & [2022 Universal Registration Document, 24/03/23: <a href="http://totalenergies.com">totalenergies.com</a> ]
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT: The Human Rights Guide provides examples of Human Rights and Principles: 'Business units' operations may have a specific impact on land and property rights, as temporary or permanent land access may be necessary. Depending on the specific societal context such as population density, land occupation and use, livelihood patterns etc. there may be negative impacts on livelihoods including the possibility of economic and/or physical displacement. The Group applies international best practice in its land access and acquisition process in order to avoid or minimize Human Rights impacts. This includes avoiding any physical displacement whenever possible, establishing clear and transparent procedures in consultation with affected people, proposing replacement land of equal quality whenever possible, providing support for livelihood restoration, ensuring people are compensated appropriately and by paying specific attention to vulnerable people and households'. However, no evidence found of a policy commitment to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the Voluntary Guidelines on the Responsible Governance of Tenure (VGGT) to recognize the importance of communities' right to access to land and other natural resources. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Company provides different documents CHRB regarding this indicator, however, no publicly available policy statement committing it to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the IFC Performance Standards. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach.</li> <li>• Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Charter Regarding Indigenous and Tribal Peoples indicates: 'The Total Affiliates shall: Consult with the Indigenous or Tribal peoples and their representatives through the procedures established by host governments, as recommended by ILO standards such as the Convention 169, and in this respect: dialogue with the communities in order to understand their goals, needs, values and constraints; Communicate plans of the operations to the indigenous groups through presentations and local meetings; inform the indigenous groups about the development of the project'. No evidence was found, however, including other policy sources, of a commitment to the ILO 169 convention or the UN Declaration on the Rights of Indigenous Peoples. [Charter Regarding Indigenous and Tribal Peoples, N/A: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Human Rights guide states that 'Indigenous people's specific rights are recognised in particular by the ILO Convention No. 169 adopted in 1989, the United Nations 2007 Declaration on the Rights of Indigenous Peoples, and various World Bank standards, including the International Finance Corporation's "Performance Standards". In accordance with these documents, indigenous peoples have the right to Free, Prior and Informed Consent (FPIC ) for developments affecting them. [...] FPIC is more than just a process of consultation. It is a negotiated process involving all interested parties, the aim of which is to allow indigenous peoples to be involved in decision making about future developments affecting them and ultimately, to give or withhold their consent. The Group recognizes indigenous peoples traditional attachment and close proximity to land and natural resources such as rivers, trees and forests'. However, although it explains the FPIC, no publicly available policy statement committing it to respecting ownership/use of land and natural resources which also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources found. Alternatively, the Company could commit to a zero tolerance for land grabbing. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Not Met: Commitment to respect the right to water: Regarding to 'Access to clean water', the Human Rights Guide indicates: 'The United Nations General Assembly explicitly recognized the Human Right to water and sanitation and acknowledged that clean drinking water and sanitation are essential to the realization of all Human Rights ( Resolution 64/292). The United Nations</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Committee on Economic, Social and Cultural Rights also defined the right to water as the right of everyone to sufficient, safe, acceptable and physically accessible and affordable water for personal and domestic use ( General Comment No. 15 on the right to water)’. It also exposes ‘examples of situations at risk’, such as ‘The permit to build a pipeline has been legally granted but the pipeline will result in the surrounding communities walking a significantly greater distance to access sufficient water for their daily needs. This may impact women in this location severely if they are primarily responsible for gathering water for the family’. And the ‘Human Rights at Stake: [...] Rights to water and sanitation [...]’. However, although the Company expands on the origin of right to water and gives examples of situation where it can be jeopardised, no formal commitment to respecting the right to water found. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to Voluntary Principles on Security and HRs: The Code of Conduct indicates: ‘Total Energies complies with [...] The Voluntary Principles on Security and Human Rights’. [Code of Conduct, 2021: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Uses only ICoCA members as security providers</li> <li>• Not Met: Commits to International Humanitarian Law</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights: The Fundamental Principles of Purchasing indicates: ‘Suppliers are required to comply [...] principles equivalent to those set forth in [...] the Voluntary Principles on Security and Human Rights’. However, no evidence found of a requirement to commit to International Humanitarian Law. [Fundamental Principles of Purchasing, N/A: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The Code of Conduct indicates: ‘We respect the rights of local communities by identifying, preventing and mitigating any impact on their environment and way of life and remedying the situation as needed. [...] We identify, prevent and remedy any negative impact of our activities on local communities, such as noise and odour pollution’. Regarding local communities, the Human rights guide states that ‘[Total] business units should "avoid, minimize, mitigate and remedy negative impacts on local communities related to their [business unit] operations’. However, no evidence found of a formal statement of policy where the Company commits to remedy any adverse impacts in individuals, workers and communities that it has caused or contributed to. The Company provided extra documents for this indicator; however, they are not considered valid sources for policy indicators. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Code of Conduct, 2021: <a href="http://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Not Met: Expects EX BPs to make this commitments: See above. The Code of Conduct indicates: ‘Our Code of Conduct also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings’. [Code of Conduct, 2021: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with EX BPs on remedy</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects BPs to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

## A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company indicates the duties of its Strategy &amp; CSR Committee [Board Committee], among which is: 'examining the Company's corporate social and environmental responsibility (CSR) issues [...]'. The Document explains that 'TotalEnergies' CSR approach is based on four pillars: [...] People's well-being: being a reference as an employer and responsible operator. TotalEnergies intends on promoting a work environment that combines performance and conviviality and ensuring compliance with human rights in the workplace, both within the Company and among its partners, but also the safety and health of people; [...]'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Process to review HRs strategy at board level</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: At least one board member incentive linked to HRs commitments: The Company indicates that 'The compensation policy of the Chairman and Chief Executive Officer does [...] provide for: [...] Performance criteria in line with the Company's long-term strategy, taking into account its CSR impact in particular'. Moreover, the CEO compensation plan is composed of three elements: 24% for 'Fixed compensation', 43% for 'Annual variable compensation (STI)' and 33% for 'Compensation from Performance Shares (LTIP)'. In 2021, HSE amounted for 29% its STI compensation. The Chairman and Chief Executive Officer is also a Board member. HSE includes 'TRIR', 'FIR, comparative' and 'Evolution of the number of Tier 1 and Tier 2 incidents'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: See above. Although the Chairman and Chief Executive Officer has an incentive for health and safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: As indicated above, the criteria linking board remuneration to human rights performance is made public 29% of Annual variable compensation. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks: The Registration Document indicates: 'The Board may address any issue related to the Company's operations. It monitors the management of both financial and non-financial matters [...]. The human rights road map is presented and reviewed regularly at Executive Committee meetings'. It also describes how the organization in charge of human rights is structured into three different levels. It notes that the Ethics Committee, a Board committee, 'plays a key role 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'. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. This subindicator focuses on the Company business model rather than focusing on the risk. No further evidence found. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Example of actions resulting from reviews: The 2022 Universal Registration Document indicates: ‘Almost a year after the coup d’état on February 1, 2021, we decided on January 21, 2022 to begin the process of withdrawing from the Yadana contracts, effective as of July 2022. PTTEP, our Thai partner in the Yadana field, became the new operator on that date. As soon as the announcement was made, we examined impacts of the withdrawal on the human rights of our employees and local communities near the MGTC pipeline, which transports the gas from Yadana to Thailand, as well as those of the employees of our contractual partners. PTTEP took on almost all of our employees, without changing their contractual terms such as salary, retirement and working conditions. Supporting measures for our employees have been implemented (regular meetings with local management, listening help line, dedicated email address to collect complaints). We also contributed financially to PTTEP’s takeover of a social program in favor of local communities’. However, this indicator looks for evidence of business model or operating approach because of inherent risks for human rights derived from current status. Evidence provided refers to the Company withdrawing from a specific project because of the risk, not to changing the way it operates. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The Company indicates that ‘The Human Rights Steering Committee monitors the implementation of this road map. It is chaired by the Company’s President, Sustainability &amp; Climate. The committee includes representatives of each business segment and of the main functional divisions that have a role related to human rights. It meets four times a year and coordinates the actions taken internally and externally by the various Company entities. The Human Rights department in the Sustainability &amp; 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. The Ethics Committee is where representatives of all TotalEnergies’ business segments sit. Its key role is one of listening and support. [...] 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’. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: See above. The Human Rights department in the Sustainability &amp; 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. The Ethics Committee is where representatives of all TotalEnergies’ business segments sit. Its key role is one of listening and support. [...] [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own operations: The 2021 Universal Registration Document indicates: ‘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. 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’. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Resources and expertise allocation with EX BPs</li> </ul>
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HRs risks integrated as part of enterprise risk system: The Registration document indicates that 'The risk factors identified in this section are the results of an ongoing risk analysis and identification process, which TotalEnergies uses to determine risks that could prevent it from achieving its objectives, and a major element of which is the mapping of TotalEnergies' risks. Risk factors are grouped by category according to their nature. Their materiality was assessed according to their probability of occurrence, their level of impact and taking into account the management systems in place. The impact level assessment was performed according to various financial, strategic, environmental, image/reputation, legal, human and HR [Human Rights] criteria'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Provides an example: Regarding to 'Geopolitics and developments in the world', it indicates: 'TotalEnergies is exposed to risks related to adverse changes in operating conditions in some geographical areas or strategic countries. [...] The occurrence and scale of incidents related to political, geopolitical, economic, health or social instability in certain strategic geographical areas or countries may be unpredictable. [...] Such incidents may also expose employees and jeopardize their safety, as well as that of TotalEnergies' facilities'. As for Risks relating to operations, it notes: 'TotalEnergies' activities entail multiple operational risks such as the risk of a major industrial accident, or damage to third parties or to the environment. [...] The activities of the Integrated Gas, Renewables &amp; Power, Refining &amp; Chemicals and Marketing &amp; Services business segments are also subject to the risk of a major industrial accident such as fires, explosions, significant damage to the environment, as well as risks related to the overall life cycle of the products manufactured, and the materials used. In addition to its drilling and pipeline transport operations, TotalEnergies had identified, at the end of 2021, 181 sites and operating zones exposed to the risk of a major industrial accident, harm or damage to people, property and the environment. [...] TotalEnergies' entities and their legal representatives may be exposed to legal proceedings, notably in the event of damage to human life, bodily injury and material damage, chronic damage to health and environmental damage. Such proceedings could also damage TotalEnergies' reputation'. No details found, however, of human rights related risks handled beyond safety. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See A.1.2.a.</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: The Company indicates that 'In order to disseminate the Company's commitments [Human Rights commitments], TotalEnergies raises its employees' awareness via internal communication channels such as intranet sites or events such as Business Ethics Day, which is held each year (headquarters and subsidiaries)'. However, it is not clear if these communications reach all workers. Regarding its Human Rights training plan, it notes: 'several training sessions were organized in 2021: For all employees: An online module on human rights in the workplace with a focus on respecting the ILO'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'. However, although training is usually assumed to take place in local languages, it is not clear this case includes all appropriate languages, as the Company is present in over 130 countries and the course is available in five languages. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a: See A.2.1.a.</li> <li>• Met: Describes steps to communicate HRs policies to EX BPs: According to the 2022 Universal Registration Document: 'the Company ensures that its suppliers are aware of and adhere to the Fundamental principles of purchasing. These are available in French and English on the TotalEnergies website (heading sustainability / supply chain) and are regularly used for awareness-raising. During the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>prequalification process, suppliers undertake to comply with these principles. [...] These Fundamental principles of purchasing include an audit clause. TotalEnergies ensures compliance with these Principles by its suppliers through an audit program'. Also, 'the Company regularly carries out awareness-raising initiatives with its suppliers on these topics [Sustainable Procurement program, including Human Rights]'. Suppliers include business partners (see A.1.2) [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The 2021 Universal Registration Document indicates: 'The Fundamental Principles of Purchasing (FPP) set out the commitments expected from suppliers in various domains, including human rights in the workplace and safety. A Company directive reaffirms the obligation to annex the FPP or to transpose them in the selection process as well as in the contracts concluded with suppliers of goods or services'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The Company indicates that 'The Fundamental principles of purchasing are the foundation for the long-term relationships that the Company wishes to build with its suppliers. TotalEnergies expects its suppliers to comply with these Principles and ensure that their own suppliers and subcontractors also comply with them'. However, it is not clear that suppliers (extractive BPs) are required to cascade the commitments as part of a contractual agreement (i.e. specific means to ensure that indirect supply chain is hold accountable). [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of at least 1 on A.1.2.a: See A.1.2.a.</li> <li>• Met: Describes how workers are trained on HRs policy commitments: The Registration Document indicates: 'Train to Speak Up was the theme chosen in 2021 to reinforce the culture of dialogue within the Company. A live chat accessible to employees was organized with the President of Gas, Renewables &amp; Power, the Chair of the Ethics Committee, the Chief Compliance Officer and the President of Sustainability &amp; Climate. [...] A Human Rights training plan, developed in 2020, aims to promote the development of a culture of respect for human rights within the Company, to better manage the associated risks, and to upskill all employees, so that they become agents of change in the long term. [...] As part of this plan, several training sessions were organized in 2021: For all employees: An online module on human rights in the workplace with a focus on respecting the ILO'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. More than 35,000 management-level employees (job level 10 or higher) had taken this module at year-end 2021'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Trains relevant managers including security on HRs: The Registration Document indicates: 'The Company promotes these principles [VPSHR] and the VPSHR requirements to the private security companies it hires in connection with its activities. These companies incorporate them, for example, through the training provided to security staff on the VPSHR. TotalEnergies regularly organizes VPSHR training sessions and awareness-raising initiatives for its employees, in particular to encourage them to report any incidents related to these principles. Specific awareness-raising work on compliance and deployment in the entities considered to be most at risk is carried out annually. The contribution of the subsidiaries to the annual "ADRA Campaign" (Auto-Diagnostic and Risk-Assessment) enables the VPSHR teams of the Security division to assist them with improvement actions throughout the year. In 2022, this awareness-raising work led the VPSHR liaisons to continue the revision the content of the training courses in order to make them more accessible and better adapted to changes and issues related to human rights and security. This improvement was made mainly by developing a new online training module for the Country Security Officers, who support Country Chairs in their role of being responsible for the Company's security at country level and who are the representatives of the Company Security division in charge, among other things, of implementing the VPSHR'. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a: See A.1.2.a.</li> <li>• Met: Meets both requirements under score 1</li> <li>• Not Met: Trains BPs to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of at least 1 on A.1.2.a: See A.1.2.a.</li> <li>• Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Company states that ' In addition to the audits and assistance missions carried out by the Audit and Internal Control Division, which cover certain human rights-related issues, the ethics and human rights-related practices of TotalEnergies' entities are regularly assessed by independent third parties and qualified experts. The British company GoodCorporation has assessed more than 140 entities since 2002with regard to the principles and values enshrined in the Code of Conduct. The entities are identified in particular according to the level of the risk of human rights violations in each country, the number of alerts received the previous year and the date of the subsidiary's last assessment. These assessments help identify best practices, share them in the Company and identify areas for improvement. Knowledge and appropriation of the Code of Conduct are tested and reinforced by ethics and human rights awareness-raising sessions'. As for its suppliers: 'the partnership formed in 2016 between TotalEnergies and a third-party service provider to assess suppliers' practices in terms of fundamental rights in the workplace remains in effect [...]. For all its activities, the Company 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'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Discloses % of EX BP's monitored: The Company indicates that 'In 2022, the Company set itself the objective of assessing its 1,300 priority Suppliers in terms of human rights and environment by the end of 2025 and then every three years, on their performance in terms of sustainable development (including human rights, working conditions and environment) through assessments covering these aspects'. However, it is not clear the proportion of its extractive business partners that is currently monitored for its Human Rights compliance. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a: See A.1.2.a.</li> <li>• Not Met: Describes corrective actions process: In the context of its own operations, it indicates: 'The ethics and human rights assessments are systematically followed up by action plans within 12 months. [...] Action plans implemented following the assessments carried out in 2019 and 2020 in subsidiaries in Brazil, Cameroon, Egypt, Nigeria, Madagascar and Russia (Vostok) were followed up in 2020 and 2021. It is planned to follow up the action plan at Pau's site in2022'. As for its suppliers: 'Suppliers with non-conformities must present an action plan, the implementation of which is monitored with internal teams'. However, no description of the corrective action plan found. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HRs performance affects selection EX BPs: The webpage section Supply Chain indicates: 'The qualification process covers five criteria: anti-corruption, technical, HSE, financial and sustainable development. This last criterion allows assessment of the risk presented by the supplier in question regarding human rights and the environment. During this risk assessment, the Fundamental Principles of Purchasing are systematically sent to the supplier for signing, a questionnaire is sent and supporting documents are requested. Following the analysis of these elements, the supplier can be qualified on the sustainable development criterion. A non-qualification on this criterion leads to the non-qualification of the supplier, meaning that the Company cannot deal with it'. [Supply chain_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: HRs performance affects ongoing BPs relationships: The webpage section Supply Chain indicates: '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'. However, it is not clear how human rights performance is taken into account in decisions to renew, expand or terminate business relationships, including with extractive business partners. The Company provides feedback on its Fundamental Purchasing</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Principles and the vigilance plan, which includes details on its regulatory framework, methodology and preparation of the plan and dialogue with stakeholders. However, the subindicator looks for evidence on how business partners' human rights performance affects their relationship with the Company, which could not be found. [Supply chain_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with EX BPs to meet HRs requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years: The 2021Registration Document indicates that 'TotalEnergies sets up dialogue procedures based on the consultation and involvement of stakeholders in order to develop constructive and transparent relations with them. This dialogue contributes to identifying main risks and impacts of the Company's operations and, more generally, by providing greater insight into main changing societal patterns and expectations of each of the major stakeholder categories'. It discloses its stakeholders, among them: employees, suppliers and civil society. It also indicates the 'Main stakeholders', 'Main modalities of dialogue' and 'Main topics of common interest and identified expectations', among each stakeholder group. The Company provides evidence for this subindicator, on which it refers to the 2022 Universal Registration Document, which indicates: 'We engage with a broad range of stakeholders, and especially with tax authorities[...]. As an illustration [of forging ties with its local public and private stakeholders and fostering dialogue focused on the regions], during 2022, in each region, think tanks were set up to engage with stakeholders on regional issues related to the energy transition [...]: the 34 meetings held brought together nearly 300 participants. Several partnerships have been established with metropolitan areas such as Toulouse and Nice Côte d'Azur to support these regions in their energy transition and economic development. TotalEnergies has also entered into a partnership with the FNSEA (umbrella organization representing local agricultural unions and regional federations) to move forward together for the decarbonization of the agricultural world'. However, it is not clear how it has identified, and engaged with affected stakeholders on Human Rights matters, including local communities or workers in extractive business partners in the last two years. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected: See above. Although the Company discloses stakeholders, it is not clear how it identifies and considers what stakeholders whose human rights may be affected.</li> <li>• Not Met: Provides two examples of engagement with stakeholders: The 2022 Universal Registration Document, details the Tilenga project, in Uganda and Tanzania, and indicates: 'In 2022, EACOP has consulted closely with four vulnerable ethnic groups self-identifying as "Indigenous Peoples" impacted by the project – the Akie, Taturu, Barabaig and Maasai. EACOP's approach with these groups included in particular: negotiation and signing of a Free Prior and Informed Consent (FPIC) Agreement between EACOP and the Akie Community of Napilikunya in July 2022 [...]; negotiation and signing by the traditional leaders of The EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples in September 2022'. However, no further cases found. Companies are expected to provide at least two examples of engagements in the context of human/labor rights [the information above mentioned is related to the same project and it is considered as part of the same process]. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach: The Registration Document, explains that, in the context of Tilenga project, in Uganda: 'Regular stakeholder engagement occurs with the full spectrum of project stakeholders including Ugandan and Tanzanian local, national and regional governmental authorities; Project-affected Communities (PACs) and Project Affected People (PAPs)(1); traditional and religious authorities; local businesses and tourism operators; developers of associated facilities; CSOs and NGOs; academic and research organizations; and Intergovernmental organizations. A variety of methods and tools are used [...]. In 2022, EACOP has consulted closely with four vulnerable ethnic groups self-identifying as "Indigenous Peoples" impacted by the project – the Akie, Taturu, Barabaig and Maasai'. However, although the Company</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			indicates there has been engagement with the local community, no description found of how stakeholders views have influenced the development or monitoring of its human rights approach (this is expected to refer to the Company's general approach, rather to a particular issue in a specific location). [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a> ]

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process of identifying risks in own operations: The Registration Document indicates: 'At project level, TotalEnergies conducts human rights impact assessments of the Company's Activities in sensitive situations (mainly based on criteria linked to the risks to human rights in each particular country) with independent organizations specialized in human rights, or in the prevention and management of conflicts between corporations and local communities. These assessments take account of the salient issues identified by the Company'. The webpage section Challenges Identification notes: 'In terms of human rights, TotalEnergies relies in particular on the U.N. Guiding Principles on Human Rights to identify its salient risks'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Challenges identification_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes process for identifying risks in EX BPs: The webpage section Human Rights indicates: 'The main challenges associated with the effects of the Company's activities in terms of respect for human rights have been identified using the methodology set out in the United Nations Guiding Principles on business and human rights (UNGP) Reporting Framework relating to the "salient issues", that is to say, the human rights at risk of the most severe negative impact through the Company's activities or business relationships'. [Human rights_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes global risk identification system incl. stakeholder consultation: The webpage section Human Rights indicates: 'In addition to the audits and assistance missions carried out by the Audit and Internal Control Division, which cover certain human rights-related issues, the ethics and human rights-related practices of TotalEnergies' entities are regularly assessed by independent third parties and qualified experts. [...] The entities are identified in particular according to the level of the risk of human rights violations in each country, the number of alerts received the previous year and the date of the subsidiary's last assessment. These assessments help identify best practices, share them in the Company and identify areas for improvement'. The webpage section Vigilant Plan indicates: 'The salient risks are thus identified by comparing indicators and information provided by external stakeholders and internal return on experience. The dialogue with local stakeholders and feedback from the field, described above [...] also contribute to this'. [Human rights_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Vigilance plan_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes assessment process and discloses salient HRs risks: The webpage section Vigilant Plan indicates: '[the work done] enabled TotalEnergies to identify and analyze the human rights risks that affect the Activities and to prioritize them according to their salience. [...] In 2019, TotalEnergies updated its procedures to analyze risks of impacts on human rights (taking into account the country, types of activity and types of raw materials or purchased products and services). This work was done with a specialized consultant, and included workshops with internal and external stakeholders. It took into account international country risk indicators established by a specialized third party. This process notably offers a support to Subsidiaries located in geographic areas at higher risk of impacts on human rights'. [Vigilance plan_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes how process applies to EX BPs: See above, the process included purchased services. [Vigilance plan_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The webpage section Human Rights indicates: 'the Company identified six salient risks subdivided across three key areas: human rights in the workplace of TotalEnergies' employees as well as of the employees of its suppliers and other business partners: forced labor and child labor; discrimination; just and favorable conditions of work and safety. human</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>rights and local communities: access to land; the right to health and an adequate standard of living. respect for human rights in security-related activities: the risk of misuse of force'. [Human rights_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1: See above.</li> <li>• Not Met: Describes how assessment involved affected stakeholders: The Tilenga HRIA indicates: 'In particular, the Assessment had a strong focus on engagement with affected stakeholders in Uganda and in the project area during an extensive fieldwork mission in April and May 2021'. One of the key activities of the HRIA was: 'Stakeholder mapping and development of interview guidance and protocols for fieldwork phase'. The Assessment is based on 'extensive engagement with affected stakeholders, civil society organizations, local and national government officials and company representatives through interviews and focus group discussions'. However, although the Company discloses an example of how it involves affected stakeholders in the assessment process, it is not clear it is part of its global approach. The Company is expected to describe how it involves affected stakeholders in the assessment processes of due diligence. The Company has provided feedback for this subindicator, however, two of the documents is considered outdated according to the CHRB three-reporting-year timeframe policy. It also refers to its Vigilance Plan [described in its 2022 Universal Registration Document] and the Code of Conduct. However, evidence was not material. Moreover, it made comments regarding a document which could not be found in publicly available sources. Finally, the Human Rights Guide indicates that 'In line with Internationally recognized Human Rights standards, Business units should: Engage with stakeholders on a regular basis. [...] Our responses to Human Rights issues with local communities are coordinated by the Group's societal teams working closely with the security and environment teams'. However, no evidence found of how it involves affected stakeholders in the assessment process. [Tilenga HRIA, 01/2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>] </li></ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues: The webpage section Vigilant Plan indicates: 'Following the assessment, the Subsidiary defines and implements an action plan, and a monitoring procedure is put in place'. Moreover, actions to mitigate risks and prevent severe impacts are 'based on return on experience from HSE incidents and include training of TotalEnergies employees, programs to raise the awareness of Suppliers, as well as measures to manage emergency and crisis situations'. However, no further description found of its global system to prevent, mitigate or remediate its salient human rights issues. The Tilenga HRIA discloses a Human Rights Action Plan Framework. However, it seems to refer to an example, rather than the description of its 'global mitigation system. The Company refers to the 2022 Registration Document, which describes actions to mitigate risks and prevent severe health and safety impacts. It includes: 'Return on experience: The Company implements a process for the analysis of accidents [...]. A return on experience may include an analysis of the incident including of its severity and result in communication to the relevant stakeholders or a wider population within the Company. [...] Awareness-raising and training of TotalEnergies' Employees: The Company has a variety of communication and information channels in place, enabling all employees of TotalEnergies SE and its Subsidiaries to have access to the Action Principles defined by the Company in relation to human rights, health, safety and the environment'. It includes: HSE training courses, Training programs dedicated to human rights for senior executives, on the VPSHR, also 'Internal channels of communication, such as websites accessible to most employees, are also used to raise employee awareness of matters pertaining to human rights'. Awareness-raising and training of suppliers: 'The Fundamental principles of purchasing constitute a contractual commitment by Suppliers [...]. practical guide on respect of human rights at work, intended for Suppliers, is shared with them and is also available on TotalEnergies' website. Training actions are also carried out for Suppliers, for example training on responsible security and the VPSHR delivered to employees of security service providers [...]. Response to emergency or crisis situations [...]'. Both employees and suppliers' training programmes include Human Rights. However, although the Company indicates actions taken to mitigate severe impacts, it is not clear how these actions address the different salient Human Rights issues identified in the Human Rights risk assessment [see B.2.2]. [Tilenga HRIA, 01/2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Vigilance plan_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes how global system applies to EX BPs</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Example of actions decided on at least 1 salient HRs issue: The webpage section Human Rights indicates: 'noise and dust emissions and other potential impacts may also have consequences for the livelihood of neighboring communities. Consequently, the access to land of local communities and their right to health and an adequate standard of living are two salient issues for TotalEnergies. In accordance with internationally recognized human rights standards, TotalEnergies expects from its entities to have a regular dialogue with their stakeholders and make sure that their activities either have no negative consequences on local communities or, if these cannot be avoided, that they limit, mitigate and remedy them. The solutions proposed in response to the expectations of local communities are coordinated by the societal teams that work in close collaboration with the Human rights department and the legal, safety and environmental teams. As part of its activities, TotalEnergies promotes dialogue and discussions with human rights defenders, as defined by the United Nations Declaration on Human Rights Defenders. The Company decided to reinforce the network of people in charge of monitoring human rights issues. As an illustration, a security advisor was created in 2020 as well as a human rights coordinator in Uganda in charge of relations with the local communities in the Mozambique LNG project have strengthened dialogue with the internal and external stakeholders concerned'. [Human rights_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken: As it is stated above: 'Continuously seek further stakeholder engagement on salient issues identified in the Assessment and gather further information about actual impacts and stakeholder perceptions and priorities'. However, it is not clear how it involves affected stakeholders in actual decisions about the actions to take in response to its salient human rights issues. The Company provided feedback to CHRB regarding this indicator, however, the supporting document is considered outdated according to the CHRB three-reporting-year timeframe policy. [Tilenga HRIA, 01/2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: The webpage section Vigilant Plan indicates: 'Following the assessment, the Subsidiary defines and implements an action plan, and a monitoring procedure is put in place'. However, no further description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective. The Tilenga HRIA discloses different monitoring tools for the different salient risks. For instance: 'Develop KPIs for tracking progress on the implementation and outcomes of the Human Rights Action Plan. Ensure periodic internal monitoring and reporting of the Human Rights Action Plan. [...] Proactively conduct inspections of the working conditions of contractors', sub-contractors' and suppliers' workers to identify and remediate potential issues before they escalate to infringements on workers' rights. These processes should be conducted collaboratively with the contractors to build their awareness and capacity to inspect and monitor their sub-contractors'. However, this seem to be an example of how it monitors in this specific context. The Company is expected to provide a description of how it tracks action plans conducted as part of due diligence generally, even if supported by an example. The Company provided feedback to CHRB regarding this indicator, however, the supporting document is considered outdated according to the CHRB three-reporting-year timeframe policy. [Tilenga HRIA, 01/2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Vigilance plan_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions: The Company has provided comments to CHRB regarding this indicator, referring to steps taken in the event of security-related incidents. However, evidence was not material.</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders: The Tilenga HRIA discloses its Communication plan for each salient issue, for instance: 'Continue to develop and produce additional information, communications and educational materials in local languages about key environmental, social and human rights issues of recurring concern or interest to local stakeholders. Proactively disclose</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the HRIA Report and the Human Rights Action Plan in a manner that encourages ongoing dialogue about the Project's salient human rights issues with local and national stakeholders, and then conduct periodic disclosure and consultation sessions about progress on the implementation of the Human Rights Action Plan'. No example found demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. The Company is expected to provide two examples. The Company provides evidence for this subindicator. Regarding to stakeholder engagement, the URD indicates: 'A variety of methods and tools are used : village meetings, small group meetings, focus group discussions, one to one meetings, site visits and tours, alternative medium such as community drives etc. Engagement is supported by disclosure materials adapted to the audience including a range of written and visual material, traditional media including community radio, telecommunications and websites. As an example, as part of the Tilenga Project, an innovative series of webinars known as "Let's Talk!" provides a deep dive into topics of interest for civil society. In 2022 subjects covered included the Tilenga biodiversity programme, road safety, gender, voluntary principles on security and human rights, and climate'. However, this subindicator looks for evidence of how the Company has responded, in terms of communication to specific concerns raised in relation to a particular issue. [Tilenga HRIA, 01/2022: <a href="http://totalenergies.com">totalenergies.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="http://totalenergies.com">totalenergies.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Registration Document indicates: 'TotalEnergies has several whistle-blowing mechanisms that are open to employees, Suppliers and third parties'. [2021 Universal Registration Document, 2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: It also states that workers receive Human Rights related training and in specific: 'Train to Speak Up was the theme chosen in 2021 to reinforce the culture of dialogue within the Company'. Moreover, 'The Company's employees, Suppliers, as well as any other stakeholder can contact the Ethics Committee to ask questions or report any incident involving a risk of non-compliance with the Code of Conduct by using a generic email address'. However, it is not clear the mechanism is available in all appropriate languages. [2021 Universal Registration Document, 2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes how workers in EX BPs access grievance mechanism: The Fundamental Principles of Purchasing indicates: 'Ensure workers can express grievances and concerns without fear of reprisal'. [Fundamental Principles of Purchasing, N/A: <a href="http://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Met: Expects EX BPs to convey expectation to their BPs: See above. The Human Rights Guide states: 'We expect our suppliers and contractors to adhere to standards that are equivalent to ours, in particular towards their employees, and to make ongoing efforts so that their own suppliers and subcontractors also respect these principles'. [Fundamental Principles of Purchasing, N/A: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Registration Document indicates: 'TotalEnergies has several whistle-blowing mechanisms that are open to employees, Suppliers and third parties'. [2021 Universal Registration Document, 2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: It also states that 'The Company's employees, Suppliers, as well as any other stakeholder can contact the Ethics Committee to ask questions or report any incident involving a risk of non-compliance with the Code of Conduct by using a generic email address'. However, it is not clear the mechanism is available in local languages and that all affected external stakeholders at its own operations are aware of it. [2021 Universal Registration Document, 2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The 2022 Universal Registration Document indicates: 'TotalEnergies has several whistle-blowing mechanisms that are open to employees, Suppliers and third parties. [...] The Company's employees, Suppliers, as well as any other stakeholder can contact the Ethics Committee to ask questions or report any incident involving a risk of non-compliance with the Code of Conduct'. However, it is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company's business partners. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on design and performance: The Human Rights Internal Guide states that 'the grievance procedure should be designed in collaboration with representatives from the local community to reflect their needs and interests and to create ownership and trust in this mechanism'. The Registration Document indicates: 'The Subsidiaries have also put in place mechanisms for managing grievances made by external stakeholders. [...] The strategy is defined according to the requirements of the stakeholder management rules and local impacts, including the assessment of societal risk, the establishment of a complaints management system and dialogue with stakeholders'. However, no details were found on whether users are engaged on the performance of the mechanism. It has provided further comments which could not be found in publicly available sources. [Human Rights Internal Guide, 2015: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance: The Registration Document indicates: 'in Argentina, as part of the societal studies prior to the Fénix offshore project, the subsidiary implemented a plan for dialogue and consultation with stakeholders. Participatory workshops and informative meetings were held and the study was published', However, the Company is expected to provide at least two specific examples of how it engages with potential or actual users of the grievance channels on the design, implementation or performance of the mechanism. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement: The Registration Document indicates: 'in Spain, where several solar energy projects are being developed, monthly meetings are held with local representatives in charge of environmental issues in 6 communities, with the aim of discussing prevention and mitigation measures adapted to the local context of 12 projects [...]. in the Republic of Congo, the societal team of the Exploration &amp; Production subsidiary has held quarterly meetings for several years with the Djéno Neighborhood Committee in order to maintain a permanent, transparent and constructive dialogue with the communities around the facilities. This is an opportunity to discuss with stakeholders the solutions to be implemented in order to minimize negative impacts and optimize the positive effects (employment, training, socio-economic development projects) of the operational activities presence'. However, this subindicator looks for at least two examples of engagement with potential or actual users on the improvement of the grievance mechanism. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Company indicates: 'As soon as the Ethics Committee receives a Complaint, it informs the author, unless he/she cannot be contacted, of the modalities concerning the treatment of his/her personal data and of the means to exercise his/her rights over these data. [...] If the Complaint is not admissible, it is closed, and its author is informed in writing within 20 working days. This period may be extended if translation or a more in-depth preliminary analysis is necessary. [...] As soon as the Complaint is considered admissible, the Ethics Committee informs the person(s) who are the subject of the Complaint of the: nature of the Complaint in question; purpose of the processing of the personal data; identity of the investigator; means of exercising their rights over their own data. [...] The author and the person(s) against whom the Complaint is made are informed when the investigation is closed. As far as possible, they are also informed of the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conclusions of the investigation’. However, it is not clear the timescales for addressing the complaints or concerns (beyond the case it’s rejected) and for informing the complainant. The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. [Collection and processing of ethical complaints, 12/2020: <a href="http://totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes technical, financial, advisory support to enable equal access: The Company makes reference to Tilenga-EACOP project and its land acquisition process and the Company’s effort to respect local communities. However, the subindicator looks for a description of the technical, financial or advisory support specifically available to complainants to enable equal access to and participation in the grievance process. The Company has also provided extra comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. [2022 Universal Registration Document, 24/03/23: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism: The Company indicates: ‘Managing grievances consists of: informing the stakeholders of this free process; receiving and registering grievances; acknowledging receipt of the grievances and informing the stakeholders about the follow-up actions; if necessary, proposing a means of settling the grievances in collaboration with the stakeholders and monitoring the handling of the grievance. This process is regularly analyzed to see where improvements can be made’. However, no explanation found of the types of outcomes to the complainant through use of the grievance mechanism. [2022 Universal Registration Document, 24/03/23: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: The Company indicates that 'No person, or persons or legal entities connected with them shall be subject to reprisals for having made a Complaint in good faith or for taking part in its processing. Anyone who considers they have been subject to reprisals for having made a Complaint or taking part in its processing as part of this System can inform the Ethics Committee accordingly'. [Collection and processing of ethical complaints, 12/2020: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: The document Collection and processing of ethical complaints indicates: 'Beneficiaries may choose not to reveal their identity and to make an ethical complaint anonymously, provided that this does not prevent processing of the complaint'. [Collection and processing of ethical complaints, 12/2020: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence: The Registration Document states that 'The procedure for collecting and processing of ethical complaints [...] describes this mechanism which provides measures to protect whistleblowers including the non-disclosure of their identity, the confidentiality of the procedure for collecting, processing, and closing of the complaints and the prohibition of any retaliation measures against whistleblowers, subject to sanctions’. However, no further evidence found indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as the through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse and engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [2022 Universal Registration Document, 24/03/23: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Fundamental Principles of Purchasing indicates: 'Ensure workers can express grievances and concerns without fear of reprisal'. The Registration Document states that 'The procedure for collecting and processing of ethical complaints, available on TotalEnergies’ website, describes this mechanism which provides measures to protect whistleblowers including the non-disclosure of their identity, the confidentiality of the procedure for collecting, processing, and closing of the complaints and the prohibition of any retaliation measures against whistleblowers, subject to sanctions’. It has also provided extra comments explaining the impact its</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			supplier's failure can have on the Company; its expectations towards its suppliers and a description of its Vigilance Plan. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at extractive business partners level, as it is not clear the mechanism is open to them. [Fundamental Principles of Purchasing, N/A: <a href="https://www.totalenergies.com">totalenergies.com</a> ] & [2022 Universal Registration Document, 24/03/23: <a href="https://www.totalenergies.com">totalenergies.com</a> ]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights: The Company indicates that 'The Collection and processing of ethical complaints procedure published internally and on the TotalEnergies website since December 2020, formally sets out the existing approach for collecting and processing complaints sent to the Ethics Committee by internal or external stakeholders concerning behaviors or situations contrary to the Code of Conduct'. The Company provided extra comments on this document, however, its content has not been found in publicly available sources. [2022 Universal Registration Document, 24/03/23: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Does not require confidentiality provisions: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts: The Company provides evidence for this subindicator, in which it refers to the Human Rights Guide. In its Message from the CEO, it indicates the Company focus on [among other aspects]: 'Addressing the potential impacts of our operations on local communities, in particular on the right to an adequate standard of living, such as the right to water and housing, and by providing access to remedy for unavoidable adverse impacts related to our operations'. However, this subindicator looks for a description of the approach it took to provide or enable a timely remedy for victims, for adverse human rights impacts which it has caused or to which it has contributed. [Human Rights Internal Guide, 2015: <a href="https://www.total.com">total.com</a>]</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company provides evidence for this subindicator, in which it refers to the Human Rights Guide. The Guide indicates Business units should: 'Integrate and Act: Implement effective measures to address any impacts that have been identified, including by having in place a grievance mechanism to address complaints lodged by stakeholders, and integrate lessons learnt'. In addition, the Registration Document indicates: 'As part of a continuous improvement process, analysis of all grievances received helps improve operations'. However, the subindicator looks for a description of changes to systems, processes and practices to prevent similar adverse impacts in the future, in the event of adverse human rights impacts which it has caused or to which it has contributed. [Human Rights Internal Guide, 2015: <a href="https://www.total.com">total.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy: The Company provides evidence for this subindicator, in which it refers to the Human Rights Guide. The Guide indicates Business units should: 'Integrate and Act: Implement effective measures to address any impacts that have been identified, including by having in place a grievance mechanism to address complaints lodged by stakeholders, and integrate lessons learnt. Track: Adapt processes to manage any Human Rights impacts that have been identified, including unanticipated impacts, and monitor and track the effectiveness of responses'. However, although the Company indicates que Business units should integrate, act and track, no description of its approach to monitoring implementation of the agreed remedy found. [Human Rights Internal Guide, 2015: <a href="https://www.total.com">total.com</a>]</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified: The Human Rights Guide indicates Business units should: 'Integrate and Act: Implement effective measures to address any impacts that have been identified, including by having in place a grievance mechanism to address complaints lodged by stakeholders, and integrate lessons learnt. Track: Adapt processes to manage any Human Rights impacts that have been identified, including unanticipated impacts, and monitor and track the effectiveness of responses'. The 2022 Universal Registration Document also indicates: 'As part of a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			continuous improvement process, analysis of all grievances received helps improve operations'. However, the subindicator looks for a description of the approach it would take to review and change systems, processes or practices to prevent similar adverse impacts in the future. [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a> ] & [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a> ]
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2021 Registration Document indicates: '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 2022 Registration Document explains the One MAESTRO reference framework: 'The One MAESTRO reference framework provides that the Company's operating subsidiaries are expected to implement grievance handling procedures aligned with the United Nations Guiding Principles on Business and Human Rights'. It also provides societal indicators for some of its segments in the One MAESTRO roll-out scope for the years 2022, 2021 and 2020. However, no further information found including the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Pays living wage or sets time-bound target: The Company indicates that 'In 2021, TotalEnergies initiated a process to assess any discrepancies between the direct salary and the living wage in all its subsidiaries. The result of the studies carried out show that by the end of 2021, 98% of employees received a direct salary that exceeds the living wage in the country or region in which they work. The Company intends to perpetuate this approach to ensure that 100% of its employees receive a direct salary that exceeds the living wage by the end of 2022. A living wage is defined as an income that allows employees: to provide a decent life for their family; for standard working hours; to cover their essential expenses (food, water, electricity, housing, education, health, clothing, etc.); the ability to cope with some of life's uncertainties'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes how living wage determined: It also states that 'TotalEnergies relies on the global database provided by the Fairwage Network, which assesses the living wage for a given country or region, based on the typical family size (number of children) and the average number of workers (between one and two)'. However, it is not clear the role of relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) in determining it. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Achieved paying living wage: The 2022 Universal Registration Document indicates the percentage of 'employees receiving a direct salary that exceeds the living wage in the country or region in which they work' for 2021: 98% and 2022: 100%. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Member of EITI: The Company indicates that 'TotalEnergies is [...] a member of other initiatives that contribute to the global effort against corruption, such as [...] the Extractive Industries Transparency Initiative (EITI) since its launch in 2002'. [2021 Universal Registration Document, 2022: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country: The Code of Conduct indicates: 'We also take part in international initiatives, including the Extractive Industries Transparency Initiative'. The Company has a Tax Transparency Report [2019-2020], in which it reports on about 60 countries, hence it is not clear it reports on all countries it operates as in its webpage, it states it is present in 130 countries. The Company has provided comments on this subindicator, however, no evidence found that it publicly reports, by country, taxes and revenue payments to all countries where it operates. [Code of Conduct, 2021: <a href="https://www.totalenergies.com">totalenergies.com</a>] &amp; [2019-2020 TaxTransparency Report, 03/2022: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Steps taken to promote transparency in non EITI countries: The Registration Document indicates that 'TotalEnergies follows the EITI recommendation with regards to obtaining the prior consent of the concerned countries before the publication of the procurement data concerning them. Therefore, TotalEnergies discloses under the category "Other Countries", aggregate data on its purchases from (i) SOEs in EITI countries that have not given such consent or to which Requirement 4.2 is not applicable by virtue of the systematic transparency implemented by their governments (Norway) and (ii) in non- EITI Countries, whether those countries have supported the transparency initiative or not'. However, the subindicator looks for a description of the steps taken to promote transparency in non-EITI countries, to be active participants in the process to promote transparency around revenue and tax payments and licensing/contracting/agreements or to becoming a member of EITI. [2022 Universal Registration Document, 24/03/23: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Measures to prohibit violence/retaliation against workers for joining trade union: Regarding employee representative bodies and collective bargaining, the 2021 Universal Registration Document indicates that in 2021 90.8% of employees had trade union representation and/or employee representation. High union recognition, in this case 98%, is taken as a proxy for not intimidating or retaliating. [2021 Universal Registration Document, 2022: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Discloses % of total direct operations covered by CB agreements: As indicated above 98% for workers were covered by collective bargaining agreements. [2021 Universal Registration Document, 2022: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1: See above.</li> </ul>
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The webpage section Health and Safety for Everyone indicates: 'TotalEnergies has therefore identified its main health and safety risks: risk of major industrial accident; risk of workplace accident; risk of transport accident; risk of damage to health at the workplace; risk of damage to the health and safety of consumers. The risks and challenges relating to people's health and safety are identified as part of a dynamic process that draws in particular on lessons learned, which are included in the HSE reference framework known as One MAESTRO (Management and Expectations Standards Toward Robust Operations). [...] the HSE division coordinates the promotion and implementation of TotalEnergies' policies to enable the HSE divisions of the subsidiaries to prevent or mitigate risks. Indicators are monitored so that the Company's actions in relation to health and safety can be continuously adapted'. With regard to the prevention of occupational health risks, 'the One MAESTRO framework provides that subsidiaries of the Company identify and assess risks at the workplace in the short, medium and long term. To do this, the framework provides application guides for implementation. The analysis of these health risks relates to chemical, physical, biological, ergonomic and mental risks. This results in the roll-out of an action plan. An Industrial Health correspondent in subsidiaries is identified and tasked with implementing the policy for identifying and assessing work-related health risks'. [Health and safety for everyone_web, N/A: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Discloses injury rate or lost days for last reporting period: The Company indicates: 'High consequence work related injuries (excluding fatalities): 12. Recordable work related injuries (per 100 million hours worked): 0.73'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Discloses fatalities for last reporting period: Number of fatalities as a result of work related injury: 1. Rate of fatalities as a result of work related injury (per 100 million hours worked): 0.26'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Discloses occupational disease rate for last reporting period: The 2022 Universal Registration Document indicates the 'Number of occupational illnesses recorded in the year' 2022: 129. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: The 2021 Universal Registration Document indicates its health and safety targets: 'zero fatalities, continuously decrease the TRIR [Total Recordable Injury Rate] and reach a TRIR of 0.70 in 2022. The target in 2021 was 0.75, maintain the health of employees at work, preventing the occurrence of major industrial accidents'. However, no targets related to occupational disease rates found. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Met targets or explains why not or actions to improve H&amp;S management systems: The webpage section Health and Safety for Everyone indicates how it works to improve health and safety in diverse areas: 'To prevent the occurrence of a major industrial accident such as an explosion, fire, leakage of hazardous products or mass leakage that might cause death, physical injury, large-scale pollution or pollution at an environmentally sensitive site, or important damage to property, TotalEnergies implements suitable risk management policies and measures which apply to the operated activities. The Major Risks division of the HSE division provides support in the application of this policy. [...] The Company has a policy for the prevention of occupational accidents which applies to all employees of subsidiaries and of contractors working on a site operated by one of these subsidiaries. The safety results are monitored with the same attention for all'. It has made efforts regarding: 'the implementation of the HSE frameworks, which are regularly updated and audited; the prevention of specific risks such as handling loads (ergonomics), road transportation, walking; training and general awareness raising with safety issues for all levels of management (world safety day, special training for managers); HSE communication efforts targeting all Company personnel; the introduction of HSE objectives into the compensation policy for Company employees. [...] In terms of preventing mental health risks (MHR), TotalEnergies has set up a global program that aims to support all employees exposed to such risks, wherever they are in the world. [...] The framework provides for that Company subsidiaries implement the Company's MHR prevention program or an equivalent local program'. As for occupational health risks: 'potential exposure to chemical or hazardous products at a site operated by a Company entity or nearby is one of the most closely monitored risks in view of the potential consequences. New facility construction projects comply with international technical standards from the design stage in order to limit exposure. For production sites operated by a Company entity and subject to this risk, the OneMAESTRO reference framework sets out the prevention process in several stages'. [Health and safety for everyone_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Process to identify/recognise indigenous rights holders: The Registration Document indicates: 'TotalEnergies acknowledges the specificities of the rights of indigenous and tribal peoples (International Labor Organization Convention No. 169) and has developed a framework which defines principles to be followed with these communities. It encourages the use of experts in order to identify and understand these peoples' expectations and specificities, to consult them and to contribute to their socio-economic development'. The Human Rights Guide indicates: 'The main criterion to identify indigenous peoples is self-identification. Several characteristics of indigenous peoples have been outlined, including by the United Nations: Historical and geographical pre-establishment of these people within a given area of land; Past or present experiences of marginalization and discrimination; Cultural difference – in terms of use of a language or way of life that differs from the rest of the majority population; Self-identification – recognising oneself and being locally recognised as such'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how indigenous communities are engaged during assessment: The Registration Document indicates: 'In some Subsidiaries within the Exploration &amp; Production segment, a network of local community mediators is in place to maintain a constructive dialogue with local communities. These mediators act as Community Liaison Officers (CLO) and are tasked with establishing an ongoing dialogue with stakeholders on the ground [...], including local authorities and communities and, more broadly, local players in civil society. Employed by TotalEnergies, sometimes coming from the local communities, they speak the local languages and understand local customs. They play a decisive role which is crucial in establishing good relations between TotalEnergies and its stakeholders and pay close attention to the most vulnerable populations'. The Human Rights Guides notes: 'The Group Charter of Principles and Guidelines regarding Indigenous and Tribal People requires Business units to engage in meaningful consultation with indigenous peoples, minimize negative impacts on them and ensure they have access to the benefits of our activities including employment and economic development'. The Group Charter of Principles and Guidelines highlights: 'the Total affiliates shall [...] Engage an ongoing dialogue with indigenous peoples' representatives [...]'. However, it is not clear engagement includes involving indigenous peoples by consulting in impact assessment. The Company provided feedback to CHRB referring to Community Grievance Mechanisms in the context of Human Rights Impact Assessment and to Stakeholder Representation in the Engagement Process. However, its content has not been found in publicly available sources. The subindicator looks for a description of how it engages directly with indigenous communities in carrying out the assessment. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> <li>• Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2022 Universal Registration Document indicates EACOP's [East African Crude Oil Pipeline Ltd] 'approach with these groups [the Akie, Taturu, Barabaig and Maasai] included in particular: negotiation and signing of a Free Prior and Informed Consent (FPIC) Agreement between EACOP and the Akie Community of Napilikunya in July 2022 – the first of its kind in Tanzania'. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes approach to identifying land tenure rights holders and negotiating compensation: The 2022 Progress Report on Sustainability and Climate indicates: 'The Tilenga-EACOP project is being developed in a sensitive social environment and requires the implementation of land acquisition programs focused strongly on respecting the rights of the concerned communities. From the very start, special emphasis was placed on informing, consulting and concerting with involved stakeholders. Nearly 70,000 people were consulted for the environmental and social impact studies and more than 20,000 meetings have been held to date with the concerned populations and civil society organizations. In accordance with International Finance Corporation (IFC) standards, a land acquisition program was developed and approved by the authorities in 2016. The program includes a full inventory of the impacted lands and crops and compensation in cash and/or in kind. In particular, each household whose primary residence is relocated may choose between a new residence or monetary compensation. In addition, programs to restore standards of living have been deployed and will continue for at least three years after the property is sold to the project. During this period, ongoing socio-economic tracking of project-affected persons will be carried out to ensure that their medium-term standard of living is not impacted. [...] The land acquisition and relocation program for Tilenga in Uganda has continued, integrating improvement pathways identified in independent studies conducted during the first phase of the project's development (2018-2019)'. [2022 Progress Report, 03/2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation: The Registration Document indicates that ‘In Tilenga, the compensation process for the first tranche of land acquisition, known as “Resettlement Action Plan 1 (RAP1)” concerning 622 PAPs has been completed. Only 7 PAPs did not accept the compensation offered after valuation of their assets. Pursuant to a judgment of the Court of Masindi on April 30th, 2021 which ruled that the compensation amounts offered were fair, TotalEnergies EP Uganda deposited the corresponding funds in a court account for the benefit of these seven PAPs’. However, no description found of how it provides financial compensation or other compensation alternatives, including its valuation methods and how legitimate tenure rights holders were involved in the determining the valuation when any new or on-going land resettlements take place. It has also provided extra information which could not be found in in publicly available sources. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes steps to meet IFC PS 5 in state deals: As indicated above: ‘In accordance with International Finance Corporation (IFC) standards, a land acquisition program was developed and approved by the authorities in 2016. The program includes a full inventory of the impacted lands and crops and compensation in cash and/or in kind. In particular, each household whose primary residence is relocated may choose between a new residence or monetary compensation. In addition, programs to restore standards of living have been deployed and will continue for at least three years after the property is sold to the project. During this period, ongoing socio-economic tracking of project-affected persons will be carried out to ensure that their medium-term standard of living is not impacted. An accessible, transparent and equitable grievance mechanism has been in place throughout the process. Grievances are handled in concertation with the necessary stakeholders to adjust solutions effectively. At the end of 2021, 89% of the grievances received about the Tilenga project had been resolved’. It adds: ‘Concerning EACOP in Uganda and Tanzania, the same land acquisition process as for Tilenga has been deployed along the 1,443-kilo-meter route for the pipeline that will carry the Ugandan crude’. [2022 Progress Report, 03/2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company describes the Voluntary Principles on Security and Human Rights [VPSRH] implementation in Mozambique: ‘TEPMA1 [TotalEnergies EP Mozambique Area 1] as operator of Area 1, and MRV, the operator of a LNG project located in another area designated as “Area 4” have signed a Security Memorandum Of Understanding (MOU), in March 2019, amended in July 2020, with the Mozambican Ministry of National Defence (MDN) and Ministry of the Interior (MINT). The MOU provides for the deployment of police and army personnel together designated as the Joint Task Force (JTF), and their logistical support with the aim of ensuring the security of Project operations and workforce and the communities residing in the broader project area of operations. The MOU requires adherence to key human rights guidelines including the VPSHR. Despite the aggravation of the security situation and the suspension of the activities since April 2021, implementing the VPSHR remains a priority for TEPMA1. VPSHR training sessions have been systematically conducted for all JTF officers deployed to site. In 2021, 1,027 officers were trained by qualified personnel from the project's security team. To improve the sustainability and the ownership of the training courses, an intensive Train-the-Trainers session was also delivered by an accredited international expert (Watchman) to 16 of the JTF commanders in June 2021. The commanders left the course with a practical kit to be used in an operational context, which has since enabled 716 members of the JTF to be trained. Consequently, the members of the JTF can now be trained directly by their superiors. A new Train-the-Trainers session is planned in 2022’. See below, through examples of work conducted in other locations, how the Company implements its security approach. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Ensures Business Partners/JVs follow security approach: The Fundamental Principles of Purchasing indicates: ‘Suppliers are required to comply with [...] the Voluntary Principles on Security and Human Rights’. Also, ‘We therefore require all suppliers of goods and services to comply with these principles and ensure compliance by their own suppliers in turn’. The webpage section Supply Chain indicates: ‘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’. [Fundamental Principles of Purchasing, N/A: <a href="http://totalenergies.com">totalenergies.com</a>] Score 2</li> <li>• Met: Security and HRs assessment includes input from local communities: The Human Rights Guide indicates: ‘Coordination between the Group’s security teams and those in charge of community relationships within societal teams is essential so that concerns and questions from communities are addressed before they can become security issues. Identifying early and appropriate responses to community concerns will ensure better relations with communities, help reduce tensions, and mitigate the risk of Human Rights abuses [...]. As stated in the Voluntary Principles, risk analysis and planning for security arrangements and rules of engagement should be done in consultation with local communities’. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>]</li> <li>• Not Met: Two examples of working with local communities to improve security: The Registration Document indicates: ‘For EACOP, the Host Government Agreements with Tanzania and Uganda included VPSHR Risk Assessments have been undertaken in Tanzania and Uganda, and action plans for ongoing implementation of the VPSHR have been developed. A Security Committee has been formed for the Project that comprises the EACOP Security Manager and representatives of public security forces from Tanzania and Uganda. [...] TEPMA1 and MRV, the operator of a LNG project located in another area designated as “Area 4”, have signed a Security Memorandum Of Understanding (MoU), in March 2019, amended in July 2020 [...]. The MoU provides for the deployment of police and army personnel together designated as the Joint Task Force (JTF), and their logistical support with the aim of ensuring the security of Project operations and workforce and the communities residing in the broader project area of operations. The MoU requires adherence to key human rights guidelines including the VPSHR’. However, the subindicator looks for two examples of working specifically with community members to improve security or prevent or address tensions related to its operations. [Human Rights Internal Guide, 2015: <a href="http://total.com">total.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes preventative/corrective action plans for water and sanitation risks: The Registration Document indicates: 'The Company's activities, [...] may potentially have an impact on, as well as be dependent on, water resources, particularly when the activity concerned is located in a water resources sensitive environment. [...] TotalEnergies implements the following water risk management actions: monitor water withdrawals to identify priority sensitive sites and then carry out a risk assessment; improve water resources management depending on identified needs, by adapting the priority sites' environmental management system. In order to identify its facilities exposed to the risk of water stress, TotalEnergies records the withdrawal of water on all of its operated sites significant for this indicator and assesses these volumes on the basis of the current and future water stress indicators of the WRI(1) Aqueduct tool. [...] For priority sites defined as those located in water stress areas and withdrawing more than 500,000 m3 per year, TotalEnergies assesses water resources risk levels using, in particular, the Local Water Tool (LWT) for Oil &amp; Gas from the Global Environmental Management Initiative (GEMI). This tool also helps guide the actions taken to mitigate the risks and to make optimal use of water resources on the sites when necessary. This risk assessment establishes that the activities of the sites operated by the Company only expose the other users of the water to a relatively low risk of water shortage. The risk mainly concerns TotalEnergies sites for which the water supply could be cut in order to maintain access to water for priority users'. The Human Rights Guide indicates: 'Business units' operations may require intensive use of resources such as water, and of other infrastructure and essential services like sewage treatment which can place them under strain. In such situations, Business units should investigate to what extent the local community will be affected by their activities in order to ensure that the operation's use of locally provided resources does not negatively affect the local population. Stakeholder consultations should be held and the local authorities responsible, for example for water, should also be consulted so that a plan is put in place before initiating operations'. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities: The Company describes its water targets: 'Reduce the freshwater withdrawal of the sites located in water stress area by 20% between 2021 and 2030 (new). Limit the hydrocarbon content of water discharges to below 30 mg/l for offshore sites. Limit the hydrocarbon content of water discharges to below 1 mg/l for onshore and coastal sites by 2030 (new)'. However, no evidence found of specific targets on water stewardship that take into consideration water use by local communities and other users in the vicinity of its operations. The Company has provided extra comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. [2021 Universal Registration Document, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Reports progress in meeting targets and trends demonstrating progress: The Company reports on some water facts: 'Stabilization of withdrawal in water stress area and launch of major resource preservation projects (preservation target of 9 Mcm/y) 93% of the Company's oil sites met the target for the quality of offshore discharges in 2022 73% of the Company's oil sites met the new target for the quality of onshore discharges in 2022'. However, this subindicator looks for a report on its progress in meeting targets, including an analysis of trends demonstrating progress. Such information could not be found. The Company has provided extra comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes processes to stop harassment and violence against women: The webpage section Human Rights indicates: 'TotalEnergies plans to step up its commitment to [...] combating violence against women by making its commitment more visible and raising awareness among medical professionals and managers'. However, no further description found of the its process in place to prohibit and address harassment, intimidation and violence against women. The Company refers to the Human Rights Guide. Regarding to Avoiding and addressing any form of Harassment, it indicates: 'To protect workers against harassment from both co-workers and management prevention policies, open communication, training and a speak up climate to allow workers to report any incidents of harassment to a complaints mechanism, should also be implemented and ensured. If a complaint of harassment is made, it is of utmost importance for managers to respond to the complaint in an efficient, timely and responsible manner, and ensure that the employee does not suffer any retaliation as a result of the complaint made in good faith. [...] For example, local content recruitment processes, hiring of local businesses for works and/or services, community investment decisions etc, should be based on clear, objective, transparent and fair criteria'. However, it is not clear that it actually takes place as the information comes from a guide and no evidence found of it actually being put into practice. [Human rights_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> <li>• Not Met: Working conditions take into account gender issues: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The webpage section To commit to its employees indicates that it 'has set the same target for its other governing bodies and leadership positions, with women comprising: 30% of Management Committee members in the business segments and large functional divisions [...]; 30% of senior executives [...]; 30% of Management Committee members at headquarters and in subsidiaries[...]; 30% of senior managers [...]. In addition, TotalEnergies builds talent pools and regularly organizes campaigns to identify high-potential employees within the Company, in order to offer them a specific development program. At year-end 2021, women made up 33.4% of high-potential employees [...] and 32.8% of Company high-potential employees. This program targets potentials for leadership positions in the Company (women represented 24% in 2014)'. [...] TotalEnergies pledged within the World Economic Forum by signing the Closing the gender gap – a call to action. This joint declaration is based on seven guiding principles (leadership; aspiration and goal setting; the Science, Technology, Engineering and Mathematics (STEM) pipeline; clear responsibility; recruitment, retention and promotion policies; inclusive corporate culture; and work environment and work-life balance) and two decisive objectives: more diverse recruitment, and greater access among women to technical and management roles'. However, it is not clear the steps it takes to address any gender pay gap throughout all levels of employment and how it measures it. The Registration Document states that 'In terms of compensation, TotalEnergies has been adopting specific measures to prevent and compensate for discriminatory wage differentials in several countries. Regular checks are carried out during salary-raise campaigns to ensure equal pay among men and women holding positions with the same level of responsibility. [...] In order to ensure equal pay for men and women, the Company plans to implement an annual review in all countries and a corrective action plan if necessary'. However, the subindicator looks for a description how it measures and takes steps to address any gender pay gap throughout all levels of employment. [To commit to its employees_web, N/A: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap: The Registration Document indicates that 'Since 2019, [...] the Company has published an index in France for its three units of economic and employee interest (UESs) on wage differentials and the steps taken to eliminate them. That index, based on a score of 100, reflects five indicators: wage differentials, pay raise differentials excluding promotions, promotion rate differentials, percentage of female employees who received a pay raise in the year they returned from maternity leave, number of employees of the under-represented gender among the ten employees who received the highest compensation. [...] At the global level, a verification of compliance with the minimum wage guaranteed by local legislation is also carried out on the base salary'. It reports on figures on wage differential, Number of women in the 10 highest earners, among other indicators, for the year 2021-2022. However, the subindicator looks for an analysis of trends demonstrating progress on closing any gender pay gap. [2022 Universal Registration Document, 24/03/23: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Land Rights</li> <li>• Headline: Campaign groups are suing Total for breaching corporate duty law in Uganda</li> <li>• Story: On October 23, 2019, the press reported that six French and Ugandan NGOs including Friends of the Earth are suing Total to disclose how it is addressing the human and environmental impacts of a Ugandan oil field. In June 2019, the groups filed a legal notification against Total alleging that the company failed to properly compensate local landowners affected by work on the Tilenga project in Uganda. A survey revealed that the project led to 'the expropriation of tens of thousands of people who have already lost their homes, their agricultural lands and their crops, in return for clearly insufficient compensation that they have been forced to accept often under pressure and intimidation and other impacts. The Company was given a three-month period to comply with the French law that requires large French companies to publish annual plans that address the adverse impact of their activities, subsidiaries and suppliers, on people and the environment. In January 2020, the judges in the high court considered that the case did not fall within their jurisdiction, rather it should sit with the Commercial Court and in March 2020, the NGOs filed an appeal of that decision. On April 12, 2022, the press reported that activists were campaigning both inside and outside the country against the Lake Albert oil project, which is run by TotalEnergies and China National Offshore Oil Corporation. The activists were demanding to halt the development of the project, which was still under construction. According to the press, a campaigner for Friends of the Earth France pointed to the people displaced by the pipeline, the sensitive local ecology and the potential impact on Lake Albert and Lake Victoria, two major water sources for the region, while in Uganda, several NGOs have been fighting to stop the project and highlighted its environmental and human rights shortcomings. The project consists of three main parts: the Tilenga and Kingfisher upstream oil fields on the shores of Lake Albert and the East Africa Crude Oil Pipeline (EACOP). Campaigners argued that people who live in the communities affected by the project are also facing recrimination if they oppose the project. Also, international campaigners outside of Uganda, the project has become a rallying point for the global climate movement. At a recent climate march in Paris, a giant pipeline was carried by protesters along with "Stop Eacop" signs. Moreover, as part of the "Stop Eacop" campaign, whose backers include Avaaz, Extinction Rebellion and 350Africa.org, the NGOs were asking banks and financial institutions not to fund the project. On November 26, 2021, the French newspaper Le Monde published an investigative story entitled "En Ouganda, le pétrole de Total impose le silence et la peur" which criticized the project for its consequences on the environment and local populations. As mentioned in the article, local populations were afraid of the return of famine, army violence, arrests, and lack of compensation. [The Independent, 24/10/2019, "NGOs file suit against Total over Uganda oil project": <a href="https://www.independent.co.uk">independent.co.uk</a>] [Reuters, 23/10/2019, "Green groups ask French court to order Total to disclose environmental steps in Uganda": <a href="https://www.reuters.com">reuters.com</a>] [Le Monde, 26/11/2021, "En Ouganda, le pétrole de Total impose le silence et la peur": <a href="https://www.lemonde.fr">lemonde.fr</a>] [Friends of the Earth France, 25/03/2020, "Affaire Total Ouganda : nous faisons appel dans un contexte de justice au ralenti": <a href="https://amisdelaterre.org">amisdelaterre.org</a>]</li> </ul>
E(1).1	The company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In response to the allegation, the company issued a response to questions from NGOs about its projects in Uganda. [Total Energies Statement on Uganda, 30/09/2019: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> </ul>

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			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Detailed response: In a statement send in 30/09/2019 to NGOs, TotalEnergies address all the aspects related to the allegation. [Total Energies Statement on Uganda, 30/09/2019: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul>
E(1).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Engaged with stakeholders: The mediation process proposed by the court and accepted by TotalEnergies could have provided an opportunity to initiate a constructive dialogue with the NGOs that brought the proceedings, similar to the dialogue that the Company's affiliates in Uganda and Tanzania have maintained with the majority of local associations since the projects began. However, the NGOs didn't accept the mediation process proposed by Paris Civil Court.</li> </ul> <p>[TotalEnergies Press Release on NGOs' Refusal of the Mediation Process, 12/10/2022: <a href="http://totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>Met: Identified cause: The allegation is related to France's "duty of vigilance" law, which came into effect in 2017, requires companies of a certain size to publish in their management report a vigilance plan on the reasonable measures taken to identify risks and prevent potential serious violations of human rights and fundamental freedoms, human and environmental health and safety, not only in relation to the company's own activities but also those of its subcontractors and suppliers with whom it has an established commercial relationship. In this respect, the TotalEnergies affiliates involved in the projects commissioned third-party experts to monitor the situations of the people affected by the project.</li> </ul> <p>[TotalEnergies Press Release on NGOs' Refusal of the Mediation Process, 12/10/2022: <a href="http://totalenergies.com">totalenergies.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Identified and implemented improvements: TotalEnergies affiliates involved in the projects commissioned third-party experts to monitor the situations of the people affected by the project. Furthermore, the company accepted the Mediation Process Proposed by the Paris Civil Court. [TotalEnergies Press Release on NGOs' Refusal of the Mediation Process, 12/10/2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>Not Met: Stakeholder input to steps taken: TotalEnergies affiliates involved in the projects commissioned third-party experts to monitor the situations of the people affected by the project. However, it is unclear if they took input from affected stakeholders into consideration. The Company provided additional feedback for this indicator. However, it was not material for the assessment. [TotalEnergies Press Release on NGOs' Refusal of the Mediation Process, 12/10/2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Provided remedy: The remedy by TotalEnergies was agreed with a commissioned third-party. The agreement involves: payment of compensation, households whose main residence is affected, societal measures, the preservation of biodiversity, etc. [TotalEnergies Press Release on NGOs' Refusal of the Mediation Process, 12/10/2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Remedy satisfactory to stakeholders: Considering the stakeholders' refusal to participate in the mediation process proposed by the Paris Civil Court. It can not be considered that remedy was satisfactory to stakeholders. [TotalEnergies Press Release on NGOs' Refusal of the Mediation Process, 12/10/2022: <a href="http://totalenergies.com">totalenergies.com</a>]</li> <li>Not Met: Remedy delivered: Even though the company agreed to provide remedy there is no evidence that the remedy was delivered to the affected stakeholders.</li> <li>Not Met: Independent remedy process used</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>Area: Security of persons</li> <li>Headline: NGO report alleges a Total site used as a prison in Yemen</li> <li>Story: On November 7, 2019, the press reported that a new report by NGO is alleging that there is a secret prison in Total facility in Yemen based on testimonies from international human rights organisations, a former detainee and the family of another detainee. A number of Shabwa residents spoke of arbitrary arrests and detentions in the province, pointing the finger at Balhaf. According to a report from the Observatoire des armements, 'Three witness statements (including two</li> </ul>

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			<p>from victims themselves) and one open source confirm that Yemeni citizens were detained in a Total controlled logistics zone at Balhaf in 2017 and 2018. The accounts contain details of inhuman and degrading treatment (torture and denial of medical care) by Emirati soldiers.' According to the press, Total owns 39.6% of the gas liquefaction complex in the Balhaf region, where activists and NGOs confirmed the existence of prison inside a military base set up by the UAE, and now the NGOs are wondering whether Total did not know the existence of this detention centre.</p> <p>[Tasnim News Agency, 09/11/2019, "UAE Running Secret Prison in 'Total' Facility in Yemen: Report": <a href="https://tasnimnews.com">tasnimnews.com</a>] [Huffpost, 07/11/2019, "UAE Running Secret Prison in 'Total' Facility in Yemen: Report": <a href="https://huffingtonpost.fr">huffingtonpost.fr</a>] [Le Monde, 07/11/2019, "Un site de Total utilisé comme prison au Yémen": <a href="https://lemonde.fr">lemonde.fr</a>] [Mena Rights Group, 18/09/2020, "Yemeni national secretly detained and tortured by Emirati forces in Balhaf": <a href="https://menarights.org">menarights.org</a>]</p>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In response to the allegation, The Total group replied Thursday in a press release that it "has no specific information as to the use made by the coalition of the requisitioned part". [Huffpost, 07/11/2019: <a href="https://huffingtonpost.fr">huffingtonpost.fr</a>] [Le Monde, 07/11/2019: <a href="https://lemonde.fr">lemonde.fr</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>
E(2).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. The company provided additional feedback for this indicator. However, it was not material for the assessment.</li> <li>• Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and their human rights impacts.</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders.</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Area: Security of persons</li> <li>• Headline: Kerosene from TotalEnergies jointly owned gas field was allegedly used to fuel Russian warplanes, investigation shows</li> <li>• Story: The investigation, published by Global Witness and French newspaper Le Monde, shows gas condensate from Total's Termokarstovoye field transported across Russia for refining, before being shipped as jet fuel to Russian Air Force bases near Ukraine.</li> </ul> <p>Those include bases for Sukhoi Su-34 fighter-bombers. The pilots of these warplanes have been accused by international experts and the Ukrainian government of indiscriminate bombing of civilian areas, including a 3 March strike on Chernihiv, near Kyiv, which reportedly killed 47 civilians.</p> <p>The findings increase pressure on Total, which unlike competitors has not pledged to pull out of its joint ventures in Russia. Total has previously stated that their activities "are completely unrelated to the conduct of military operations by Russia in Ukraine".</p> <p>Total owns 49% of TerNefteGaz, a company set up to operate the Termokarstovoye field, with Novatek owning the remainder. Total also owns 19.4% of Novatek itself, giving the French company a majority economic interest in the joint venture.</p>

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			<p>Presented with the supply chain data by Le Monde, Total confirmed that all gas condensate produced by TerNefteGaz is sold to Novatek, making up 7% of the company's marketed volumes, but said that it did not have any information on Novatek's subsequent sales and has no control over the operational activities of Novatek, which is an entirely separate company.</p> <p>In October 2022 two NGOs filed a lawsuit against the Company in France, which has since been dismissed. The NGOs are pursuing further legal action appealing this decision.  [Global Witness, 24/08/2022, "French cash, Russian fuel, Ukrainian blood": <a href="https://www.globalwitness.org">globalwitness.org</a>] [France 24, 16/01/2023, "Charges dismissed against TotalEnergies for 'complicity' in Ukraine war crimes": <a href="https://france24.com">france24.com</a>]</p>
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:  Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In a press statement published by the Company in response to the article by Le Monde the Company indicates that "All of the gas condensate produced by Terneftegaz is sold to Novatek, in accordance with the contracts put in place since the beginning of the project. Novatek uses these condensates, along with crude and condensate from its other sources, to supply a wholly-owned refinery, the output of which it sells independently. TotalEnergies does not take part in Novatek's decisions concerning the processing and sale of condensate.[...] Under the Terneftegaz framework agreements, all gas and liquids produced are sold to Novatek, an independent non-State-owned company. These products are entered into Novatek's general input stream and are processed and sold together with its other oil and condensate output. Terneftegaz's production represents 7% of Novatek's marketed volume. Novatek refines all of its liquid feedstock (including gas condensate) in a refinery it owns in Russia to make fuel that it sells on the Russian market. TotalEnergies has neither information on nor control over the sales made independently by Novatek on the Russian market." The Company further questioned the basis for the allegation that "gas condensate produced by Terneftegaz is ... being used to make kerosene for Russian fighter jets". [No, TotalEnergies Does Not Produce Kerosene for the Russian Army, 24/08/2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: While the Company's statement explains the contractual relationships regarding the gas condensate produced by the joint venture, it does not refer to the rights violations by the Russian military that the products are linked to. [No, TotalEnergies Does Not Produce Kerosene for the Russian Army, 24/08/2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
E(3).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:  Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:  Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link: France's anti-terrorism prosecutors confirmed in January 2023 the complaint filed by Darwin Climax Coalition and Razom We Stand had been closed with no further action after an "exhaustive legal and factual analysis of all the elements submitted by the complainants and, at its own initiative, TotalEnergies". However, the two NGOs are pursuing further legal action against this decision, citing doubt in the process' legitimacy due to political and economic pressures. [France 24, 16/01/2023: <a href="https://france24.com">france24.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used: France's anti-terrorism prosecutors confirmed in January 2023 the complaint filed by Darwin Climax Coalition and Razom We Stand had been closed with no further action after an "exhaustive legal and factual analysis of all the elements submitted by the complainants and, at its own initiative, TotalEnergies". However, the two NGOs are pursuing further legal action against this decision, citing doubt in the process' legitimacy due to political and economic pressures. [France 24, 16/01/2023: <a href="https://france24.com">france24.com</a>]</li> </ul>

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