

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	TotalEnergies SE
Sector	Oil and gas
Headquarters	Paris, France
Type	Public
Date of submission to company (month/year)	June 2023
Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). For information purposes.	
Does the company, directly or through a subsidiary (including joint-ventures) participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries your company is participating in MSGs?	ARGENTINA, MAURITANIA, PAPUA NEW GUINEA, REPUBLIC OF THE CONGO, SENEGAL, SURINAME, UGANDA, UNITED KINGDOM
Secretariat comment	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.

EXPECTATION 1		Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.
Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes	
URL for Statement Support	https://totalenergies.com/sustainability/creating-shared-value/business-ethics#eiti	
Secretariat's assessment on Expectation 1	Expectation met	
Secretariat comment	Statement of support published on the company website. See URL.	
EXPECTATION 2		Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.
Does the company publish a list of controlled subsidiaries?	Yes	
URL for controlled list of subsidiaries	https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-03/TotalEnergies_URD_2022_EN.pdf	
EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.	ANGOLA, ARGENTINA, BURKINA FASO, CHAD, COLOMBIA, CÔTE D'IVOIRE, DEMOCRATIC REPUBLIC OF THE CONGO, DOMINICAN REPUBLIC, GABON, GERMANY, GHANA, GUINEA, GUYANA, INDONESIA, IRAQ, KAZAKHSTAN, MADAGASCAR, MALAWI, MALI, MAURITANIA, MEXICO, MOZAMBIQUE, MYANMAR, NETHERLANDS, NIGERIA,	

	NORWAY, PAPUA NEW GUINEA, PHILIPPINES, REPUBLIC OF THE CONGO, SENEGAL, SURINAME, SÃO TOMÉ AND PRÍNCIPE, TAJIKISTAN, TANZANIA, TOGO, UGANDA, UKRAINE, UNITED KINGDOM, ZAMBIA
Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.	Yes
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	List of controlled subsidiaries published. See URL for 2022 Universal Registration Document, note 18, p. 510. Company assessed as making disclosures in accordance with EITI Standard.
EXPECTATION 3	Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates in the oil, gas and mining sectors?	Yes



<p>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</p>	<p>https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-03/TotalEnergies_URD_2022_EN.pdf Section 9.3. URD p 558</p>
<p>Are the disclosures disaggregated by project?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 3</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>TotalEnergies discloses taxes and payments to governments in non-EITI implementing countries. See URL, p.558.</p> <p>The company discloses taxes and payments to governments disaggregated by project. See URL, "Universal Registration Document 2022" under "9.3 Report on the payments made to governments" (p. 558-586 in PDF).</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>

EXPECTATION 4

Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.



Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	Yes
If yes, which countries?	GERMANY, INDONESIA, IRAQ, MEXICO, NIGERIA
Does the company make disclosures in line with the EITI Standard/reporting guidelines?	Yes
URL for disclosure	https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-03/TotalEnergies_URD_2022_EN.pdf
Secretariat's assessment on Expectation 4	Expectation met
Secretariat comment	<p>TotalEnergies buys oil, gas and/or mineral resources from the state in EITI implementing countries.</p> <p>TotalEnergies discloses information in line with EITI Standard and EITI reporting guidelines for companies buying oil, gas and minerals from governments.</p> <p>The company publicly discloses volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines in its "Universal Registration Document 2022" under "9.4 Reporting of payments to governments for purchases of oil, gas and minerals (EITI reporting)" (p. 587-589 in PDF).</p>

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EXPECTATION 5		In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.
Does the company disclose its audited financial statements?	Yes	
URL audited financial statements	https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-03/TotalEnergies_URD_2022_EN.pdf	
Secretariat's assessment on Expectation 5	Expectation met	
Secretariat comment	TotalEnergies discloses audited financial statements. See URL for 2022 Universal Registration Document p. 407-535.	
EXPECTATION 6		Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.
Does the company publish a statement of support for beneficial ownership transparency?	No	
URL statement of support for beneficial ownership	https://totalenergies.com/sustainability/creating-shared-value/business-ethics#eti	



Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	Euronext, New York Stock Exchange
URL to stock exchange	https://totalenergies.com/investors/share-information/totalenergies-share-price-paris
URL for recent beneficial ownership disclosures	https://totalenergies.com/investors/shares-and-dividends/ownership-structure https://totalenergies.com/system/files/documents/2022-03/DEU_21_VF.pdf
Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>TotalEnergies does not publish statement of support for beneficial ownership transparency though it indicates that it is supportive of such transparency.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements. Additionally, disclosures about the company's shareholders can be found on chapter 6 of the "Universal Registration Document 2022", p. 383-399.</p>

EXPECTATION 7	
All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.	
Does the company publish an anti-corruption policy?	Yes
URL to the policy	Prevention and Fight Against Corruption: https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-04/2015-09-30_livret_ac_en_version_web_final.pdf
Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?	Yes
Secretariat's assessment on Expectation 7	Expectation met
Secretariat comment	<p>The company publishes an anti-corruption policy. See URL.</p> <p>TotalEnergies' anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The International Secretariat notes that TotalEnergies' "Prevention and Corruption" policy sets out its "Due Diligence Process "Know Your Partner" (p. 6). Accordingly, "The anti-corruption referential provides a due diligence process that must be followed, according to the corruption risks, before contracting</p>

	<p>with a third party (supplier, representative, business partner, acquisition of or divestment from a company...). This process allows for certain searches/checks (shareholders of the third party, ultimate beneficiaries, ...):</p> <ul style="list-style-type: none"> • The risks analysis: enables to identify the risks linked with the considered activity and to adapt the following steps; • The due diligence steps that may for example include: sending a questionnaire to be filled in by the considered contracting third party, using an external provider to collect information on this third party, reviewing information provided by the said third party as part of a data room, etc. • If the relationship with the third party is carried on, the implementation of appropriate mitigation measures based on the information obtained during the previous steps.”
<p>EXPECTATION 8</p>	<p>Publicly declare and publish support for governments’ efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</p>
<p>Does the company publish a statement of support for contract transparency?</p>	<p>Yes</p>
<p>URL for statement of support for contract transparency</p>	<p>https://totalenergies.com/sustainability/commitments-and-progress-indicators</p> <p>https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-03/Tax transparency report 2019 2020.pdf, p 4</p> <p>https://totalenergies.com/sustainability/creating-shares</p>

	ed-value/business-ethics "Promoting financial transparency"
Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?	Yes
Secretariat's assessment on Expectation 8	Expectation met
Secretariat comment	<p>The company publishes a statement of support for governments' efforts to publicly disclose contracts and licenses on its website under "Our commitments and progress indicators": "TotalEnergies advocates for the disclosure by countries of their petroleum contracts and licenses." See URLs.</p> <p>Company assessed to contribute to disclosure of contracts and licenses in EITI implementing countries.</p>
EXPECTATION 9	Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.
Does the company publish a commitment/policy on gender diversity?	Yes
Does the company disclose employment data disaggregated by gender?	Yes



URL for relevant information	<p>Diversity Roadmap https://totalenergies.com/sustainability/people-s-well-being/commitment-to-its-employees#diversity https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2022-04/FeuilleR_Diversite_2021_V_En.pdf</p> <p>Universal Registration Document https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-03/TotalEnergies_URD_2022_EN.pdf</p>
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	TotalEnergies publishes commitment and/or policy on gender diversity. See URLs for Diversity Roadmap. The company discloses employment data disaggregated by gender. See URL for Universal Registration Document p. 335-337.