

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	TotalEnergies
Sector	Oil and gas
Headquarters	Paris, France
Type	Publicly listed
Date of submission to company (month/year)	January 2026
PREAMBLE MSG Participation	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	ANGOLA ARGENTINA GABON MOZAMBIQUE NIGERIA PAPUA NEW GUINEA REPUBLIC OF THE CONGO SENEGAL SURINAME UGANDA

<p>Secretariat comment on MSG participation</p>	<p>The Secretariat notes TotalEnergies' proactive engagement in the multi-stakeholder groups (MSGs) in Angola, Argentina, Gabon, Mozambique, Nigeria, Papua New Guinea, Republic of Congo, Senegal, Suriname and Uganda.</p> <p>The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.</p>
<p>EXPECTATION 1 <i>Public support for the EITI</i></p> <p><i>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.</i></p>	
<p>Does the company publish a statement of support for the EITI and the objective of the EITI Association?</p>	<p>Yes</p>
<p>URL for Statement Support</p>	<p>Business Ethics Webpage: https://totalenergies.com/sustainability/creating-shared-value/business-ethics</p>
<p>Secretariat's assessment on Expectation 1</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>TotalEnergies publishes a statement of support for the EITI on its website. See URL.</p>
<p>EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i></p> <p><i>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.</i></p>	
<p>Does the company publish a list of controlled subsidiaries?</p>	<p>Yes</p>
<p>URL for controlled list of subsidiaries</p>	<p>Form 20-f 2024: https://totalenergies.com/system/files/documents/totalenergies_form-20-f-2024_2025_en.pdf</p>

	<p>Universal Registration Document 2024: https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</p>
<p>EITI implementing countries where the company operates.</p>	<p>ANGOLA ARGENTINA COLOMBIA DEMOCRATIC REPUBLIC OF THE CONGO GABON GUYANA INDONESIA IRAQ KAZAKHSTAN MAURITANIA MEXICO MOZAMBIQUE NETHERLANDS NIGERIA NORWAY PAPUA NEW GUINEA REPUBLIC OF THE CONGO SENEGAL SURINAME SÃO TOMÉ AND PRÍNCIPE TAJIKISTAN TANZANIA UGANDA UNITED KINGDOM</p>
<p>Does the company make disclosures in accordance with the EITI Standard or</p>	<p>Yes</p>

in relation to EITI implementing countries?	
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	<p>List of controlled subsidiaries published. See URLs for Form 20-f p.136 and universal registration document p. 541.</p> <p>Company assessed as making disclosures in accordance with EITI Standard. The company makes full disclosures across EITI implementing countries, with some gaps in disclosures in Gabon.</p> <p>The company is commended for voluntarily disclosing EITI-related information in Angola, despite such disclosures not being required under the country's confidentiality laws.</p>
EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i>	<i>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.</i>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	Universal Registration Document 2024: https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf
Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met

Secretariat comment	<p>TotalEnergies discloses payments to governments in non-EITI implementing countries. See URL Universal Registration Document pg. 587 - 613 (section 9.3)</p> <p>The company discloses taxes and payments to governments disaggregated by project. See URL. pg. 587 - 613 (section 9.3)</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
EXPECTATION 4 <i>Commodity trading transparency</i>	<p><i>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.</i></p>
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	<p>Yes</p>
If yes, which countries?	<p>COLOMBIA GERMANY INDONESIA IRAQ MEXICO</p>
Does the company make disclosures in line with the EITI Standard and reporting guidelines?	<p>Yes</p>
URL for disclosure(s)	<p>Universal Registration Document 2024: https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</p>
Secretariat's assessment on Expectation 4	<p>Expectation met</p>

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 2024" under "9.4 Reporting of payments to governments for purchases of oil, gas and minerals (EITI reporting)" (p. 613- 617).</p> <p>The secretariat notes that the company could consider including fees, charges and credits, and type of state-owned commodity (e.g. production sharing contract)</p>
<p>EXPECTATION 5 <i>Disclosure of audited financial statements</i></p> <p><i>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.</i></p>	
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	<p>Universal Registration Document 2024: https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</p>
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	TotalEnergies discloses audited Financial Statements. See URL p. 450.
<p>EXPECTATION 6 <i>Beneficial ownership transparency</i></p> <p><i>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.</i></p>	
Does the company publish a statement of support for	Yes

beneficial ownership transparency?	
URL for statement of support for Beneficial Ownership	Business Ethics Webpage: https://totalenergies.com/sustainability/creating-shared-value/business-ethics
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	Paris Stock Exchange, New York Stock Exchange
URL to stock exchange	XPAR: https://live.euronext.com/en/product/equities/fr0000120271-xpar NYSE: https://www.nyse.com/quote/XNYS:TTE
URL for recent beneficial ownership disclosures	Universal Registration Document: https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf
Secretariat's assessment on Expectation 6	Expectation met
Secretariat comment	<p>The company publishes a statement of support for beneficial ownership transparency. See URL Business Ethics Webpage, section Promoting financial transparency.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements. The company is publicly listed on Paris Stock Exchange and the New York Stock Exchange. See URLs.</p> <p>The company publishes a list of its major shareholder in its 2024 Universal Registration Document. See URL p. 432.</p>

<p>EXPECTATION 7</p> <p><i>Due diligence processes and anti-corruption policies</i></p>	<p><i>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.</i></p>
<p>Does the company publish an anti-corruption policy?</p>	<p>Yes</p>
<p>URL to the policy</p>	<p>Business Integrity Guide: https://dxm.content-center.totalenergies.com/api/wedia/dam/variation/xysh7dg731ta7noft3ntsfs9oc/original.default</p> <p>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</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>TotalEnergies publishes an anti-corruption policy. See URLs.</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>TotalEnergies describe their anti-corruption policy within its Business Integrity Guide; the guide applies to all Total employees and prohibits all forms of corruption and bribery. This guide includes a definition and examples of corruption as well steps that the company takes to prevent corrupt behaviour. The guide focuses on anti-bribery provisions and includes a description of the risk-based steps that the company takes when partnering with third parties, including due diligence or collection and use of</p>

	<p>beneficial ownership data. See URL Business Integrity Guide pgs. 5-9.</p> <p>TotalEnergies also publishes a standalone Prevention and Fight Against Corruption. This programme outlines where responsibility lies in the organisation for preventing corruption and references further sets of internal rules which apply for different business scenarios which include corruption risk. The programme describes TotalEnergies risk based due diligence process, which includes allowing for searches and checks including shareholders of the third party and ultimate beneficiaries. The policy describes that this information is collected and used at three stages risk analysis, due diligence checks and the implementation of risk mitigation measures. See URL Prevention and Fight Against Corruption pg. 6.</p>
<p>EXPECTATION 8 Contract transparency</p>	<p><i>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.</i></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>Tax Transparency Report 2023: https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2024-07/totalenergies_tax-transparency-report-2022-2023_2024_en_pdf.pdf</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 8</p>	<p>Expectation met</p>

<p>Secretariat comment</p>	<p>TotalEnergies publishes a statement of support for governments' efforts to publicly disclose contracts and licenses. See URL p.4 and 33.</p> <p>Company assessed to contribute to disclosure of contracts and licenses in EITI implementing countries. The secretariat notes efforts could be further made to support contract disclosure in Iraq, as the company has not published any agreements to date for the stake in Halfaya or the 2023 contract for operating the Artawi field.</p>
<p>EXPECTATION 9 <i>Gender Diversity</i></p> <p><i>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.</i></p>	
<p>Does the company publish a commitment/policy on gender diversity?</p>	<p>Yes</p>
<p>URL for commitment/policy on gender diversity</p>	<p>Diversity Road Map 2021-2025: https://totalenergies.com/sites/g/files/nytnzq121/files/documents/2023-05/diversity-roadmap-2023.pdf</p>
<p>Does the company disclose employment data disaggregated by gender?</p>	<p>Yes</p>
<p>URL for gender disaggregated employment data</p>	<p>2024 Universal Registration Document: https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</p>
<p>Secretariat's assessment on Expectation 9</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>TotalEnergies publishes commitment and/or policy on gender diversity. See URL.</p> <p>The company discloses employment data disaggregated by gender. See URL p. 392.</p> <p>The secretariat notes that the company reports on its gender pay gap. See URL for 2024 Universal Registration Document p. 393.</p>