



## TOTAL UK LIMITED

Marketing and Services

### MODERN SLAVERY STATEMENT for 2020

*This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the anti-slavery and anti-human trafficking statement of Total UK Limited for the financial year ending 31 December 2020.*

#### Introduction

Following the publication of Total UK Limited's Modern Slavery Statement in 2020, we have continued to extend our actions on modern slavery, focusing particularly on identifying modern slavery risks within the business and our supply chain and following up on any risks identified. We have highlighted some of the actions taken in 2020 by Total UK Limited towards the end of this statement.

Total UK Limited is ultimately wholly owned by TotalEnergies SE (referred to together with its subsidiaries as "TotalEnergies"), a top tier international energy company with worldwide exploration, production, processing and marketing activities employing more than 100,000 people across in excess of 130 countries. TotalEnergies SE's shares are listed and publicly tradeable on the Euronext Paris Stock Exchange and the New York Stock Exchange.

TotalEnergies requires high professional standards of behaviour in all its business dealings and has implemented a range of policies, guides and training to ensure these high standards are met. TotalEnergies' non-financial performance metrics, including actions in support of human rights, are also reported in TotalEnergies' [Universal Registration Document 2020](#).

In TotalEnergies' [Human Rights Guide](#) the CEO of TotalEnergies, Patrick Pouyanné, sets out human rights as one of TotalEnergies' three priority business principles,

*"Respect for Human Rights in the workplace for our employees and promotion of these principles in our supply chain, in particular by preventing child and forced labour, avoiding discrimination, observing workers' rights and by respecting freedom of expression."*

In pursuance of this priority business principle, Total UK Limited is committed to prevention of slavery and human trafficking in its own activities and in its supply chain by requiring suppliers to maintain ethical business practices and in particular to prevent slavery and human trafficking in their businesses.

#### Total UK Limited

Registered Office: 183 Eversholt Street, London NW1 1BU, UK - Registered in England No.553535  
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This statement sets out the steps taken by Total UK Limited to ensure that there is no slavery or human trafficking in its own business and to require suppliers to take the same approach in the supply chain.

This statement relates to actions and activities undertaken during the financial year ending 31 December 2020.

## Organisation and Supply Chain

Total UK Limited supplies goods or services in the UK and abroad and acquires goods and/or services in the UK and abroad.

Total UK Limited's main customers are companies to which it supplies goods and/or services through its marketing and services activities.

Total UK Limited has a supply chain to support the production of its specialty products and its business operations. This includes:

- **Specialty Products:** finished products are manufactured at Total UK Limited's company-owned plants within the UK, multiple TotalEnergies-owned plants throughout Europe and a limited number of external suppliers.
- **Raw Materials:** Total UK Limited manufactures the majority of its finished products within its UK-based plants, which require the acquisition of raw materials. The suppliers of such raw materials are either other affiliates of TotalEnergies or external suppliers.
- **Business Operations:** in addition to the manufacture and sale of specialty products, Total UK Limited also has a number of other supply chains related to general business operations including those relating to its 3 sites within the UK, digital presence and employee benefits.

## Implementing our Commitment

Total UK Limited implements its commitment to eradicate modern slavery in its business in 4 ways: policies, governance and processes, supply chain and due diligence, and training.

### 1. Policies

At a corporate level directives and policies exist which apply to all staff. Consistent with International and EU legislation on human rights, TotalEnergies has directives and policies concerning the prevention of modern slavery and guides to educate staff regarding their obligations. These directives and policies are adopted by local subsidiaries so as to ensure consistency across TotalEnergies and maintain TotalEnergies' international reputation.

The relevant policies are set out below.

### 2. Governance and processes

TotalEnergies' Ethics Committee is responsible for the general oversight of the implementation of the [Code of Conduct](#). The Ethics Committee provides guidance to the business regarding compliance with the Code of Conduct and investigates and addresses any complaints of breaches of the Code of Conduct including with respect to human

rights. The Chairwoman of the Ethics Committee of TotalEnergies reports directly to the CEO, Patrick Pouyanné. She also reports regularly to TotalEnergies' Executive Committee and to the Governance & Ethics Committee of TotalEnergies' Board of Directors.

In addition, Total UK Limited has a Compliance and Ethics Officer who is responsible for promoting compliance with and the understanding of the Code of Conduct.

Staff are encouraged to report any possible breach of the Code of Conduct, by "speaking up" through a whistleblowing policy. This can be done in several ways, as set out below.

### 3. Supply chain and due diligence

TotalEnergies' Code of Conduct requires that our suppliers comply with our [Fundamental Principles of Purchasing](#), make sure that their own suppliers also respect equivalent standards, and require suppliers to pay particular attention to their Human Rights standards including employees' working conditions and those of their suppliers.

Contracts with our suppliers require the contractor to adhere to TotalEnergies' [Fundamental Principles of Purchasing](#) which include provisions regarding respecting human rights at work, as set out below.

### 4. Training

Training at a corporate level includes online and face to face training programmes to ensure that employees are familiar with the requirements of the [Code of Conduct](#), the company policies and our individual obligations to respect human rights. Additional training is organised at an affiliate level. Every new employee of Total UK Limited must complete an online training course, which includes modules relevant to Modern Slavery.

## Our Policies and Processes

TotalEnergies' key policies concerning the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking, applied in Total UK Limited's operations, are as follows:

- [Code of Conduct](#): Respect for Human Rights is one of the core principles to which employees must adhere. Respect for Human Rights includes respect for internationally recognised Human Rights standards, in particular we abide by:
  1. The OECD Guidelines for Multinational Enterprises.
  2. The United Nations Global Compact.
  3. The Universal Declaration of Human Rights
  4. The UN Guiding Principles on Business and Human Rights
  5. The Fundamental Conventions of the ILO.
  6. The Voluntary Principles on Security and Human Rights.

The TotalEnergies Code of Conduct, available in 19 languages, can be found here: [Ethics: We Are Committed To Exemplary Behavior | TotalEnergies.com](#)

- The [Human Rights Guide](#), and [Business Integrity Guide](#), provide more detailed guidance on the matters addressed by the Code of Conduct.
- [Fundamental Principles of Purchasing](#): suppliers are required to abide by our Fundamental Principles of Purchasing.

The [Fundamental Principles of Purchasing](#) contains several key principles concerning health, safety and the environment, anti-corruption compliance and other matters, and in particular requires our suppliers to respect human rights at work in compliance with the international standards referred to above.

Total UK Limited works with its suppliers to ensure that they take special care to comply with the Fundamental Principles of Purchasing and improve their workers' working conditions.

Serious violations by a supplier of TotalEnergies' Fundamental Principles of Purchasing entitle Total UK Limited to terminate the contract.

- **Recruitment/Agency workers policy:** Total UK Limited uses its own internal recruitment team along with selected, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Processes – reporting and audit:** The Code of Conduct specifically encourages employees to “speak up”: that is, to report any instances of non-compliance with the Code of Conduct, including any breaches of human rights.

Employees may report matters of concern to their immediate manager, a Human Resources manager, any other manager, their Compliance Officer, their Ethics Officer or directly to the TotalEnergies Ethics Committee via its helpline [ethics@totalenergies.com](mailto:ethics@totalenergies.com). In addition, employees have access to a free, third-party whistleblowing service.

Employees of suppliers to TotalEnergies in the UK, and other external stakeholders, may also contact the Ethics Committee of TotalEnergies to ask questions or report incidents where there is a risk of a breach of human rights. The suppliers and the internal purchasers can also contact the internal supplier mediator using a general email address [mediation.fournisseurs@totalenergies.com](mailto:mediation.fournisseurs@totalenergies.com) (see: [Trust-based relationships with our suppliers | TotalEnergies.com](#)).

TotalEnergies regularly conducts internal ethical evaluations and human rights assessments of its subsidiaries to ensure that they are complying with the requirements of the Code of Conduct. TotalEnergies also undertakes social and labour rights evaluations of its suppliers. These are conducted on an ad hoc basis by independent, external contractors, and cover compliance with human rights requirements.

- **Actions:** TotalEnergies is party to a [global agreement](#) with IndustriALL Global Union, which represents 50 million employees across 140 countries. The agreement provides a formal framework for safeguards and standards at the global level, covering social, environmental and CSR issues such as developing employee dialogue and promoting

Human Rights, diversity and workplace safety. A review committee (the “FAIR Committee”) made up of representatives from TotalEnergies and trade unions affiliated with IndustriALL meets annually to assess the implementation of the agreement and identify areas for improvement and actions to be carried out.

Since 2018, TotalEnergies has been a member of the United Nations Global Compact action platform on Decent Work in Global Supply Chains, and, in this capacity, takes part in various workshops that aim to help the member companies of the Global Compact to make progress in this area. In December 2018, TotalEnergies signed the “Six Commitments” of this United Nations Global Compact action platform.

TotalEnergies is an active member of IPIECA’s Supply Chain Working Group. TotalEnergies continues to participate in the UN Guiding Principles work group organised by IPIECA, aimed at both oil and gas companies and engineering, procurement and construction (EPC) contractors and contributes to the materials produced by them. In addition, in 2018 TotalEnergies launched an initiative on sharing of human rights audit findings together with BP, Shell and Equinor. AkerBP and Wintershall have now joined this initiative as well. The intention behind this initiative is to develop a common collaborative approach to assess the respect of human rights by our suppliers and to encourage the improvement of working conditions in the supply chain. In 2020, a common collaborative platform became operational and the first test audits carried out remotely and on-site have begun.

### **Supply Chain: Due diligence**

In the procurement of goods and services, Total UK Limited strives to ensure the prevention of illegal labour through the enforcement of the policies already referred to, engagement with its suppliers, contractual clauses, audits and assessments aimed at ensuring that any supplier guarantees their workforce is suitably competent, trained and employed in full compliance with applicable laws, including the use of foreign employees.

“At risk” suppliers are required to complete a due diligence questionnaire concerning their compliance with TotalEnergies policies, the Modern Slavery Act 2015 and with international standards concerning forced labour and related matters. At corporate level, in line with the Fundamental Principles of Purchasing and TotalEnergies’ Human Rights Roadmap, TotalEnergies has entered into a partnership with a third-party service provider to conduct social and labour rights audits of its suppliers. The audits process is being continuously reviewed with a view to strengthening its value in improving respect for human rights, including the prohibition of forced labour and child labour in the supply chain.

Total UK Limited carries out standard pre-qualification questionnaires on all potential suppliers, and TotalEnergies is working on a global group tool which will be used for supplier pre-qualification as well as ongoing evaluation. Implementation of this tool is expected during 2023.

### **Highlighted Actions taken in 2020**

In 2020, TotalEnergies started a process to update the Fundamental Principles of Purchasing to strengthen its focus on respecting human rights at work and ensuring that working conditions and remuneration of workers are fair, preserve human dignity and are consistent with the principles defined by the Universal Declaration of Human Rights and by the fundamental

Conventions of the International Labour Organization. An updated version of the Fundamental Principles of Purchasing was issued at the beginning of 2021.

In December 2020, Total UK Limited participated again in the annual TotalEnergies Business Ethics Day held every year to mark the UN International Anti-Corruption Day and Human Rights Day.

Total UK Limited is continually striving to improve its awareness of and response to modern slavery issues within its business including:

- In 2019, Total UK Limited contributed to the Human Rights & Working Conditions audit plan of the TotalEnergies Global Purchasing work group and in 2020, in conjunction with the work group, this included auditing Total UK Limited's supply chain. This work will continue in 2021.
- In addition to the mandatory training for all employees and contractors on the Code of Conduct, Business Ethics and Anti-Corruption, the need for specific training on human rights at work was identified in 2019. In February 2020, this training was rolled out to all employees and contractors and it will continue to be mandatory in 2021.

#### Approval

This statement has been approved by the Board of Directors of Total UK Limited. The Board has authorised a Director, Almila Acan Kahvecioglu (Managing Director), to sign the statement.

Signed

on behalf of Total UK Limited

Almila Acan Kahvecioglu  
Director

Date: 29 June 2021