

WHISTLEBLOWER POLICY

1 INTRODUCTION

Technip Energies ("**Company**") is committed to conducting business in compliance with all applicable laws and regulations and all the Company's codes and policies. Therefore, it is important that the Company is aware of all possible violations, especially those that violate applicable laws and regulations or our Code of Business Conduct.

This Company's Whistleblower Policy ("**Policy**") is intended to encourage everyone within the Company to report any suspected misconduct or irregularity. This Policy sets out what and how matters should be reported, the procedure that is followed once a report has been made, and how employees reporting concerns are protected in accordance with the Institute for Whistleblowers Act (*Huis voor Klokkeluiders*) and the Dutch Corporate Governance Code.

2 WHO CAN REPORT?

This Policy applies to all Employees of the Company.

"**Employee**" in this Policy means (a) all individuals who have or have had an employment contract with the Company and (b) all individuals who otherwise carry out or have carried out work for the Company.

3 WHICH CONCERNS ARE COVERED BY THIS REPORTING POLICY?

This Policy applies to concerns about suspicions of possible misconduct or irregularities within the Company ("**Misconduct**"). These concerns may relate to the following matters:

- a possible criminal offence or violation of the law;
- a violation of the Company's internal policies and/or procedures;
- threats to the environment;
- giving or receiving a bribe;
- an aspect of the firm's operations or premises which may endanger someone's health or safety;
- the apparent ill-health of anyone working for the firm affecting his or her work or behaviour;
- drug or alcohol abuse;
- disclosure of confidential information; or
- dishonesty or unethical behaviour.

Employees are encouraged to raise any other concern by using this Policy, even if the concern is not listed above.

An Employee's report of suspicions of possible Misconduct should be submitted in good faith and supported by relevant factual information having a direct connection to the matter reported. An Employee need not be certain that Misconduct has taken place to speak up.

4 **CAN I ASK SOMEONE FOR ADVICE?**

Employees may consult any member of the Company's Compliance team as a confidential advisor ("**Confidential Advisor**") about suspicions of possible Misconduct. An Employee can discuss his or her concerns with the Confidential Advisor in confidence.

If requested by the Employee, the Confidential Advisor will inform the Reporting Officer (as defined below) to take the matter further. In that case, a report will be submitted.

The contact details for the Compliance team can be found on the Technip Energies' intranet.

5 **WHO SHOULD I REPORT TO?**

Employees are encouraged to first report matters to their direct manager or supervisor. However, if for any reason this is not appropriate, Employees should report concerns using EthicsPoint, the dedicated reporting hotline (<http://technipenergies.ethicspoint.com/>), or by reporting to the Chief Compliance Officer (the "**Reporting Officer**").

If the Reporting Officer is involved in the suspected Misconduct, Employees may nonetheless report concerns using EthicsPoint; controls in EthicsPoint ensure that the Reporting Officer will be bypassed and excluded from the report, which will be forwarded to the General Counsel. Alternatively, Employees may report a concern directly to the General Counsel.

If the concern relates to a member of the Company's board of directors ("**Board**"), the Employee may report directly to the chair of the Board.

In cases where the report should be addressed to the chair of the Board, this person will act as the Reporting Officer under this Policy.

6 **HOW CAN I REPORT?**

Employees may report matters in writing or orally, including through the dedicated EthicsPoint website or telephone line. The contact details of the Reporting Officer and the chair of the Board can be found on the Technip Energies' intranet site.

7 **CAN I REMAIN ANONYMOUS?**

The Company encourages an open culture and emphasises the importance of Employees raising concerns openly to assess, investigate and gather additional information, if required. However, if an Employee does not want to raise a concern openly and wishes to remain anonymous, the Company will use all reasonable efforts to ensure the Employee's anonymity (unless the Company is required to comply with a competing legal or regulatory obligation).

Employees may also report anonymously using the dedicated reporting hotline (<http://technipenergies.ethicspoint.com/>) or by reporting directly to the Reporting Officer.

8 WHAT HAPPENS AFTER I REPORT A CONCERN?

The Company takes every report of suspicions of possible Misconduct seriously. After submitting a report, the Employee receives a confirmation of receipt of the report within two business days.

The Reporting Officer will carry out (or will designate someone to carry out) an initial assessment to determine how the report should be followed up, and, where appropriate, investigated.

Where possible, the Company will inform the Employee of the outcome of this assessment. The Company may request additional information from the Employee at this time.

The Company intends to give the Employee an indication of how the Company will deal with the report, the expected timeframe, the results of the investigation and any actions taken in response. However, the need for confidentiality and privacy and other considerations may prevent the Company from being able to give the Employee specific details regarding the investigation or any remedial and disciplinary action taken as a result. Any information shared with the Employee about the investigation and action taken must be treated as confidential.

The Company cannot guarantee the outcome expected or desired by the Employee. However, the Company is committed to dealing with the Employee's genuine concerns fairly and appropriately.

9 WILL REPORTS BE TREATED CONFIDENTIALLY?

The Company will treat any report confidentially to allow for an adequate investigation of the report and to comply with applicable privacy laws.

An Employee may indicate that his or her report should be treated confidentially. The name of the Employee who submitted a report in good faith will not be disclosed to others within or outside the Company unless the Employee gives his or her prior written consent or the Company is required to comply with a legal or regulatory obligation. The Employee is entitled to deny or withdraw his or her consent at any time and must be informed of this right prior to giving consent.

The information received will only be shared with others within or outside the Company if and to the extent this is required to appropriately deal with the report and the issues raised in it. Again, the name of the Employee will not be disclosed unless the Employee has given his or her consent or there is a legal or regulatory obligation to do so.

The Company will generally notify the person implicated in a report that concerns have been raised in relation to him or her. The Company will make this notification within a reasonable time and take into consideration the interests of the investigation. The Company will take all reasonable measures to prevent that the person implicated in a report from learning the identity of the Employee who submitted the report.

These confidentiality guidelines do not apply to a report that was not made in good faith (without prejudice to applicable privacy laws).

10 HOW WILL I BE PROTECTED IF I REPORT A CONCERN?

No Employee who, in good faith, raises a concern involving matters covered by this Policy will suffer harassment, retaliation or any other adverse employment consequences as a result of raising a concern. The Company will not tolerate any form of threat or retaliation and will take disciplinary action against relevant co-workers or managers where appropriate.

An Employee who believes he or she has been penalised because of the Employee's status as a reporter of suspected Misconduct or due to participation in the investigation of a report is encouraged to immediately report this conduct to his or her manager, EthicsPoint, the Reporting Officer, or the Confidential Advisor to allow the Company to take appropriate remedial measures.

The Company may only take disciplinary actions if the Company concludes that a report has not been made in good faith, for example, because false allegations have been made knowingly, improperly, maliciously, or for personal financial gain.

If the Employee who reported the concern was personally involved in suspected Misconduct, reporting the Misconduct does not exempt the Employee from possible disciplinary actions by the Company or civil, criminal or regulatory liability. In determining appropriate disciplinary action, the Company will take into consideration that the Employee voluntarily and in good faith reported the suspicions of Misconduct through this Policy.

11 CAN I REPORT CONCERNS OUTSIDE THE COMPANY?

Employees are expected to report their concerns internally. Special Dutch rules apply regarding exceptional circumstances where Suspicions involving the Public Interest (as defined below) can be reported outside the Company to the Institute for Whistleblowers, or, in Company operating locations outside the Netherlands subject to EU Directive 2019/1937, or to another external authority appointed under applicable local law.

"Suspicions involving the Public Interest" should meet the following criteria:

- (i) suspicions that are based on reasonable grounds, arising from knowledge acquired by the Employee in working for the Company or arising from knowledge acquired by the Employee through work activities within another company or organisation; and
- (ii) suspicions that involve the public interest because of the violation of laws and regulations, or threats to public health, the safety of individuals, the environment or the proper functioning of a public service or a company because of improper actions).

External reporting of Suspicions involving the Public Interest could be appropriate if an internal report was not adequately followed up by the Company, or if the Employee cannot reasonably be required to first submit an internal report, for instance because of a legal reporting obligation, a present danger resulting in an important and urgent public interest, or a legitimate fear of retaliation. If an external report is to be made, it should be made to a competent regulator and in an appropriate manner taking into consideration the legitimate interests of all involved. Except in rare circumstances, reporting matters to the press or on social media will not be appropriate or permissible.

Given the possible severe consequences of external reporting, Employees are encouraged to seek advice before reporting any concern outside the Company. They can do so with the Confidential Advisor. In the Netherlands, Employees may also consult the advisory department of the Institute for Whistleblowers.

In addition, in the cases where an external report could be made under this article, an Employee may report a Suspicion involving the Public Interest to the investigation department of the Institute for Whistleblowers. For more information regarding the Institute for Whistleblowers and its procedures, please consult the website (<https://www.huisvoorklokkenluiders.nl>).

12 PRIVACY

If you would like to know what your data protection rights are and how the Company processes your personal data, please consult the Code of Business Conduct, the Data Privacy Standard, Global Employee Notice, Independent Contractor and Professional Partners Notices and the Notices to Helpline Reporter and to Subject of a Helpline Report.

This Policy was adopted by the Board on 15 February 2021 and came into effect on 16 February 2021. This Policy and other materials about reporting suspicions of Misconduct will be published on the Technip Energies intranet and the Technip Energies' website, www.technipenergies.com.