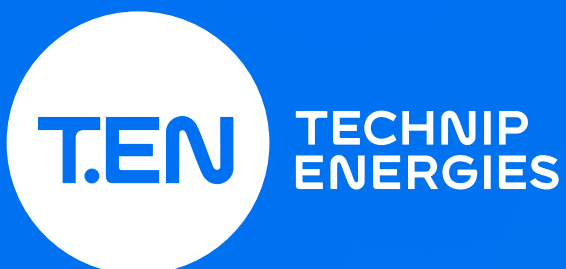


Where energies make tomorrow ●

# Our Code of Business Conduct

English

January 2025





# Welcome

Arnaud Pieton, Chief Executive Officer

Technip Energies is a world-leading engineering and technology player for the energy transition. We leverage our rich history and remarkable track record, as well as our passion for excellence, into building a better tomorrow by breaking boundaries together to engineer a sustainable future. We translate the priorities of today into tangible actions to benefit our clients, people, communities, and planet, and we do that together.

In everything we do, everywhere and all the time, we act with Integrity.

Why? Because, at Technip Energies, we consider that Integrity is a critical element to our success. The way each of us behaves, whether toward our colleagues, clients, partners, suppliers, shareholders, or others within or outside the company, makes a difference. We have labeled this Integrity @ the core.

Making the right decision every time, wherever we work, may not always be easy in today's complex global business environment. **Our Code of Business Conduct serves as a guide** to keep us on course, providing an unwavering reference for all our decisions and actions. I count on, and thank you for, your commitment.



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## Welcome

3

What is Technip Energies' Code of Business Conduct? 7

What are our Values? 8

Our Values – defined 9

What is our role? 11

What should you do if you have a concern? 12

Will you get in trouble for reporting? 13

Our response to concerns 14

Understanding our Code of Business Conduct 15

---

## Protecting people and the environment

16

Behavior at work 18

Fair employment practices and equal opportunity 19

Health, Safety, and Environment (HSE) 21

Human rights 22

Community involvement 23

Immigration compliance 23

Security 24

Thank you to all colleagues who are featured in our pictures.

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## Protecting assets and information 26

Protection of intellectual property	28
Accurate books and records	30
Information security	34
Artificial intelligence	36
Privacy and personal data	39
Insider trading and stock tipping	40

## Protecting business and brand 42

Anti-corruption and influence peddling	44
Gifts, hospitality, and sponsored travel	48
Donations and sponsorships	51
Conflict of interests	52
Anti-money laundering	55
Tax Policy	56
Trade compliance	58
Competition and antitrust laws	60
Quality leadership	62
Political activities	63
Corporate image and brand	64
External communications	65
Social media	66



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**We will translate the priorities of today into tangible actions for a better tomorrow to benefit our clients, people, communities, and planet.**

# What is Technip Energies' Code of Business Conduct?

The Code of Business Conduct (our Code) is built on our Values and reflects the way we do business.

At Technip Energies, we adhere to all applicable laws, which may not always provide clarity on what we need to do when faced with issues arising as part of our operations. In addition, we sometimes go over and beyond the requirements of applicable laws.

Our Code describes the decision-making and behaviors expected of you and of the company when dealing with each other and our stakeholders. It is intended to give you additional guidance to ensure that we do business and conduct ourselves in a Technip Energies way.

The Code works in conjunction with our policies, standards, procedures, and other relevant documents, which are published on our intranet (called T.ENET) and are referenced throughout the Code. Such documents may collectively be referred to as our internal requirements. Do not hesitate to refer to them when you need a fuller explanation of Technip Energies' principles.

## Our Purpose

# Breaking boundaries *together* to engineer a sustainable future



Our Purpose statement captures the essence of who we are and why we do business. It demonstrates our passion and defines what we bring to the world. It broadens our horizons to realize the potential of our 16,000 talented professionals around the world. Conceived by our people and our stakeholders, our Purpose reflects our DNA and inspires all of us to act. It guides us on our mission to design and deliver added-value energy solutions to accelerate the energy transition.

We will translate the priorities of today into tangible actions for a better tomorrow to benefit our clients, people, communities, and planet.

And we will make this journey *together*.

# What are our Values?

Our Values are purposefully action-oriented because we want them to be fully embedded in the way we behave, run our business, and manage our projects.

These Values frame the way Technip Energies wants to do business, inspire employees, and deliver the best experience to clients. They are a strong component of the DNA that unites us at Technip Energies, and express what we believe in.

## Our Values



# Our Values – defined

**These definitions specify the meaning of each Value and how to bring them to life.**

## **WE actively listen**

Actively listening at all times is key to building trust. At Technip Energies, we focus on understanding the messages, views, and priorities of our internal and external stakeholders. This helps us to clarify their challenges and provide them with the best solutions.

## **WE are inclusive and collaborative**

Inclusion allows us to leverage diversity and promotes collaboration toward shared goals. At Technip Energies, we care for our people and do whatever it takes to foster well-being. We value respect, nurture team spirit, support one another, and treat everyone fairly.

## **WE strive for excellence**

Excellence is the key to achieving a high standard of performance, and it starts with everyone's accountability. At Technip Energies, we give our very best to meet our clients' challenges, delivering outstanding solutions, projects, services, and technologies. We provide the best quality at the right cost.

## **WE drive sustainable change**

Change is the only option as the world strives to deliver a better tomorrow. At Technip Energies, we challenge the status quo. We champion creativity and innovation, which encourages entrepreneurship and drives our commitment to transform the industry, positively impacting the future.

## **WE don't compromise on safety and integrity**

Safety and integrity are part of our DNA. At Technip Energies, wherever we are, whatever we do, safety and integrity frame the way we carry out our projects, do business, and act every day.

*Safety is about protecting the physical and mental health of our people.*

*Integrity is doing the right thing in everything that we do, everywhere, and at all times.*



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**We aspire to develop business relationships with like-minded clients, subcontractors, suppliers, and business partners who are guided by a similar set of principles of business conduct.**

# What is our role?

Each of us plays a role in maintaining the company's reputation, and together we create the Technip Energies culture.

## Our Code applies to each of us:

- All directors, officers, and employees.
- All employees of our subsidiaries and affiliates.
- Anyone who represents Technip Energies or acts on our behalf, including contract employees, partners, subcontractors, suppliers, contractors, agents, and sales agents.

## We are all expected to:

### Live

Read and understand our Code of Business Conduct and our policies, and live them every day.

### Report

Report any deviations to our Code of Business Conduct and our policies through the available reporting options, which allows us to implement appropriate mitigation actions.

### Lead

Help team members follow our Code of Business Conduct: lead by example, provide training, and encourage open communication on the issues we face.

### Stop

Stop any activity that conflicts with our Code of Business Conduct or our policies, or creates undue risk.

### Support

Foster an environment where every employee feels safe reporting issues and promote fair treatment, courtesy, and respect of individual rights.

## Sharing our Code:

We aspire to develop business relationships with like-minded clients, subcontractors, suppliers, and business partners who are guided by a similar set of principles of business conduct.

This Code should be shared and discussed with clients, suppliers, and our business partners to better explain our rules of conduct and reinforce our culture of accountability.

# What should you do if you have a concern?

## If you are unsure about a situation, ask yourself these questions:

- Are the actions legal?
- Are the actions consistent with our Values?
- Do the actions set a good example?
- Would I be comfortable if the actions became public?
- Is the situation good for the company or me?

If you answer no to any of these questions, a violation of our Code or policies has occurred or may occur, and you have the responsibility to report.

The important thing is not to leave your concerns unresolved, and we expect all employees who have become aware of an actual or potential violation of the Code of Business Conduct to report their concern immediately.

At Technip Energies, we promote openness, transparency, honesty, and communication, all of which fosters trust and collaboration within the workplace and with our clients and other stakeholders.

## You can freely and openly share your concerns through any of these channels:

- Your direct manager or someone else in your management.
- The Chief Compliance Officer or anyone in Ethics & Compliance.
- Any officer of the company.
- Your People & Culture Department representative.
- Your Legal Department representative.
- An independent third party via the dedicated reporting [Integrity Line](#).

No matter what reporting channel you use, all reports are assessed in the same manner, regardless of how or to whom they have been submitted.

# Will you get in trouble for reporting?

Technip Energies has a zero-tolerance policy on retaliation against employees for reporting suspected violations of our policies or Code of Business Conduct.

We encourage employees and third parties to raise questions and concerns to ensure that we are leading by example.

Retaliation against anyone who makes a good-faith report of possible violations of our internal requirements, or cooperates with an investigation, is strictly prohibited and will be subject to strict disciplinary action, including, and up to, termination.

Report actual or potential retaliation to the Chief Compliance Officer or anyone in the Ethics & Compliance department immediately.

# Our response to concerns

**Technip Energies takes all reports of suspected violations seriously and is committed to ensuring that they are reviewed confidentially, thoroughly, and impartially.**

Any person reporting a suspected violation of our Code – including those who choose to remain anonymous – will be informed of receipt of the concern as well as the progress and closing of the investigation.

For detailed information on which concerns should be reported, how to report them, the procedure that follows once a report has been made, and how employees reporting concerns are protected, please refer to the Technip Energies Whistleblower Policy and Allegation Management Standard.

If you are asked to participate in an investigation or to attend an interview and/or provide information, you must assist honestly, openly, and fully. In certain circumstances and in accordance with applicable laws, when investigating concerns Technip Energies may access, review, and disclose information processed or stored by the company's equipment, systems, devices, or computers.

We will investigate all reports and take necessary remedial action, including disciplinary action, up to termination or legal action, when appropriate.

# Understanding our Code of Business Conduct

All employees are required to complete our Code of Business Conduct learning, which includes a declaration of compliance with the Code of Business Conduct. You may be asked to complete other Ethics & Compliance learning and this is key to reinforcing integrity and competence in our company. You will be notified of Ethics & Compliance learning to complete through our learning management platform.



# Protecting people and the environment

<b>Behavior at work</b>	<b>18</b>
<b>Fair employment practices and equal opportunity</b>	<b>19</b>
<b>Health, Safety, and Environment (HSE)</b>	<b>21</b>
<b>Human rights</b>	<b>22</b>
<b>Community involvement</b>	<b>23</b>
<b>Immigration compliance</b>	<b>23</b>
<b>Security</b>	<b>24</b>



# Behavior at work

**We believe that all our employees are entitled to fair treatment, courtesy, and respect of their rights, wherever they are working – in the office, offshore, on industrial and construction sites, or in client offices.**

## How to behave

Trust the team and do not accept any disparagement from colleagues. Every achievement and every failure should be shared.

We will maintain a culture of trust and mutual respect and dialogue throughout our business. We listen, motivate, and support others to achieve common objectives, and we value the contributions of others.

We do not tolerate any form of abuse, violence, or harassment, and will not tolerate any action, conduct, or behavior that is humiliating, intimidating, or hostile.



## Always

- Be open-minded, transfer our knowledge, and share information as needed, subject to Technip Energies' rules on confidentiality.
- Create a positive work environment and report any abusive, violent, or harassing behavior.
- Foster an objective approach based on mutual respect to recognize each other's contributions.
- Encourage your team to report any instance of harassment such as physical or social isolation (silent treatment) or indecent proposals for employment advantages.
- Feel supported to engage in a discussion with any colleague if you are upset by their actions or behavior.



## Never

- Engage in physical or verbal behavior that could be characterized as offensive, intimidating, malicious, or insulting.
- Make unwelcome sexual suggestions or advances.
- Make racial, ethnic, religious, age-related, or sexual jokes or insults. If you are not sure whether something is appropriate, assume that it is not.
- Distribute offensive materials, including inappropriate pictures, jokes, or cartoons.
- Disclose personal information or spread malicious rumors.

# Fair employment practices and equal opportunity

**Our hiring and employee development decisions are fair and objective. This means that all employment decisions will be based only on qualifications, performance, skills, and experience.**

## How to behave

We strive to create a positive work environment.

All employment-related decisions are based on relevant qualifications, demonstrated skills, performance, and other job-related factors.

We ensure that our suppliers, clients, and business partners are aware of our goal of creating a diverse and tolerant workforce.



## Always

- Treat everyone fairly and without any form of discrimination.
- Make sure your employment decisions related to recruitment, selection, evaluation, compensation, development, etc., are not influenced by race, color, beliefs, gender, age, ethnic origin, nationality, sexual orientation, marital status, legal status, or health status.
- Explain, if you receive a CV from a third party asking for their application to be considered, that hiring decisions are made based upon the needs of our organization and managed by People & Culture.



## Never

- Tolerate unlawful discrimination related to employment.
- To avoid even the appearance of a potential conflict of interest, do not:**
- Maintain a direct or indirect reporting relationship with a family member.
  - Interfere in any aspect of your relatives' employment (recruitment, selection, evaluation, compensation, development) during their career with the company.



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**We strive to implement the most efficient and environmentally friendly solutions available while protecting our people and reducing the impact of our activities at all times.**

# Health, Safety, and Environment (HSE)

**At Technip Energies, we strive to implement the most effective, efficient, and environmentally friendly solutions available while protecting our people and reducing the impact of our activities at all times. We will not compromise on safety, health, or environmental sustainability to achieve results.**

**We are committed to fostering an incident-free environment worldwide, based on the principle that all incidents are preventable. Our clients, shareholders, suppliers, contractors, partners, and employees have the right to expect excellent HSE performance from us.**

## How to behave

The key to HSE success is a strong culture where all employees work together to prevent incidents and take ownership of HSE, regardless of their position. A strong HSE culture relies on visible and effective leadership, as well as clear communication of procedures and regulations, which focus on actively managing risks present during the execution of projects.

This culture drives a high awareness of our procedures and empowers our people to be personally involved when an HSE risk exists or may be expected.

We expect all our employees to know their role in our HSE culture and procedures, and understand why these rules exist. We also expect them to act as HSE leaders and take specific and effective actions that protect the health and safety of our people and minimize the impact of our activities on the environment.



## Always

- Know and comply with the applicable health, safety, and environmental rules and regulations.
  - Understand the risks related to a job and implement the required measures and actions to protect health, safety, and the environment and prevent incidents before beginning operations.
  - Intervene if health, safety, or environmental rules are not duly respected, and stop an unsafe act or condition.
  - Ensure that effective health, safety, and environmental management systems and procedures are in place and functioning wherever we operate, and that a positive HSE culture exists.
  - Ensure that your direct reports receive the required HSE-related training, including training in Technip Energies' HSE culture change program (Pulse).
  - Follow up and correct HSE issues that are raised directly.
  - Encourage employees to stop working when there is an unsafe condition and welcome intervention.
  - Praise good HSE practices and challenge poor ones.
- As a manager, you have further responsibility to always:**
- Act as a role model for others by demonstrating positive HSE behaviors.
  - Make employees, contractors, and suppliers aware of applicable HSE rules, procedures, and expected behaviors, and their role in HSE culture wherever we operate.

# Human rights

## We are committed to recognizing human rights on a global basis.

Our business conduct is informed by the *United Nations Guiding Principles on Business and Human Rights*, the *Universal Declaration of Human Rights*, and the *International Labour Organization Declaration on Fundamental Principles and Rights at Work*. We are also committed to upholding and implementing the Ten Principles of the United Nations Global Compact, to which we are a signatory.

We support the elimination of all forms of modern slavery, including forced and child labor, regardless of where we conduct business. This is reflected in our Global Human Rights Policy and in our Supplier & Subcontractor Integrity Expectations.

### Human rights in the workplace

We take the necessary steps to ensure fair labor practices and comply with local laws regarding employment, working hours, and wages.

We respect our employees' rights and freedom of association and collective bargaining in a manner that is consistent with applicable laws.

### Human rights and local communities

We are committed to continuous improvement as we develop our human rights due diligence program for our operations.

We assess potential human rights impacts for the local communities living where we do business and will apply effective prevention and mitigation actions as appropriate.

We offer a mechanism for registering complaints and we create a dialogue with local stakeholders. We expect our business partners to respect the human rights of those working within, or affected by, their business and to act in compliance with our Global Human Rights Policy and Supplier & Subcontractor Integrity Expectations.

We will comply with all applicable laws relating to conflict minerals.

### How to behave

Technip Energies' reputation is built on the personal behaviors of our employees across the world. All of us must understand and follow these principles:



#### Always

- Treat people with dignity and respect.
- Apply Technip Energies' human rights commitments and principles.
- Act without discrimination or prejudice.
- Create an environment that is free from harassment and violence.
- Ensure that our business partners and suppliers do not engage in inappropriate labor practices, including forced labor or illicit forms of child labor.
- Promote equality in the workplace with salaries based on merit.
- Understand how to recognize potential human rights risk in your work and decision-making.
- Know how to recognize forms of modern slavery.

- Cooperate with inspections and audits conducted to verify that our Values are implemented throughout the company.
- Prevent the forcible displacement of individuals, groups, or communities.
- Work to protect the economic livelihood of local communities.



#### Never

- Discriminate in any form, whether based upon race, nationality, beliefs, gender, age, ethnic origin, place of residence, sexual orientation, marital status, social and legal status, or health status.
- Tolerate sexual harassment or violence, or any other form of harassment in the workplace.

# Community involvement

The communities in which we work are important stakeholders for Technip Energies, and we strive to be a responsible corporate citizen.



## How to behave

Our employees are encouraged to ensure that Technip Energies is a responsible corporate citizen in our communities.

## Always

- Design sustainable development initiatives with a focus on long-term added value.
- Engage with local communities impacted by our activities in close coordination with our clients and contribute to social and economic self-sustainability.
- Anticipate and minimize potential disruptions to the community.
- Mitigate any negative impacts to local communities from our activities.
- Contribute to local employment growth by fostering training and transfer of skills and technology.
- Respect local cultures and be aware of local practices and traditions, and cultural factors that may impact behaviors and decisions, in addition to abiding by local laws.

# Immigration compliance

We are committed to making sure the employment, travel, transfer, and residence of employees conform to applicable immigration and employment laws.



## How to behave

We do not hire or recruit anyone not legally authorized to work in the country in which employment is sought.

Each of us is accountable for maintaining our immigration status in compliance with the laws of the countries in which we work.

## Always

- Ensure that you have appropriate visas and other permits before traveling into a country.
- Ensure that you have the appropriate work permits required to be an employee of Technip Energies.



## Never

- Travel without a passport or other applicable identification.
- Misrepresent your identity or fail to disclose applicable information relating to immigration or employment.
- Overstay your visa.

# Security

**Our objective is to ensure the security of Technip Energies employees and our clients and business partners at our work sites wherever we operate.**

**Our employees travel all over the world. We are committed to ensuring their protection during transit and at their final destinations.**

## How to behave

Security requires the commitment of everyone to ensure the protection of all. You are the primary caretaker of your security. This is why it is essential that you know and respect the security measures in place at your work site, whether that is in an office, a plant, or construction site.



## Always

- Know and comply with our Global HSE & Security Policy.
- Be mindful of the security risks related to your work environment and know the general security precautions to reduce your risk exposure.
- Comply with any new changes in the security of your work environment and ensure that your colleagues are aware of the changes.
- Keep your profile up to date within [Technip Energies' Emergency Notification System](#), in order to receive Technip Energies alerts and advisories.
- Be aware of the emergency procedures applicable to your work site so you know what to do in case of an incident, including the location of the muster point.

- Ensure that you have the local emergency number and the [Global Security Assistance number](#).
- Immediately contact your security manager if you receive a package or letter of suspicious origin. Do not open it or try to identify the contents.
- Immediately contact your security manager if you see a suspicious or unauthorized person in the office or in a restricted area.
- Make sure your badge is visible when you are working in the office or on a project site.
- Accompany all visitors in the office or on a project site.

## Immediately report to your security manager:

- If you are the victim of a theft in the office, on site, or while traveling.
- If you witness a security breach.

## While traveling:

- Follow the Technip Energies security recommendations and requirements when traveling. Find out more: [SMARTravel Program](#)
- Ensure that you have a means of communication that works in your destination country.
- Read the latest security information before traveling to a foreign country.
- Be aware of questionable offers such as advantageous exchange rates, sightseeing visits, organized tours, and offers of free services.
- Be sensitive to cultural and religious differences when traveling.



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**Security requires the commitment of everyone to ensure the protection of all.**

# Protecting assets and information

Protection of intellectual property	28
Accurate books and records	30
Information security	34
Artificial intelligence	36
Privacy and personal data	39
Insider trading and stock tipping	40



# Protection of intellectual property

Our expertise, technology, and execution are what make us unique. This is the result of our ideas, our techniques, and our processes. Collectively this is called Technip Energies' intellectual property, or confidential information. Our intellectual property is embodied in our product offerings and becomes the basis for the solutions that meet our clients' increasingly complex requirements.

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**We must all protect Technip Energies' patents, copyrights, trademarks, trade secrets, and other proprietary information.**



## How to behave

We must all protect Technip Energies' intellectual property (i.e., patents, copyrights, trademarks, and trade secrets) and other confidential information, and be careful not to unintentionally or improperly share our intellectual property or confidential information with others. Any unauthorized disclosure or misuse, either during or after your employment with Technip Energies, could be harmful to Technip Energies or to our clients, or helpful to our competitors. The unauthorized disclosure or use of confidential information and/or Technip Energies intellectual property may lead to disciplinary action, up to and including termination of employment or legal action. Technip Energies may seek all legal remedies available to it to protect the unauthorized use of its intellectual property and confidential information.

Technip Energies must ensure that it respects the intellectual property rights of others by complying with all laws, regulations, and contractual obligations. Further, we are responsible for protecting third-party intellectual property and confidential information that we are authorized to use and, therefore, we must all take the same care with our clients', subcontractors', and suppliers' intellectual property and confidential information.

To avoid these risks and to protect our intellectual property, we must ensure that new products, software, processes, and services are reviewed for new inventions or trade secrets, and that they do not infringe on the intellectual property rights of others.

## Always

- Respect the intellectual property rights of other parties when designing our products, software, processes, and services.
- Obtain valid licenses prior to utilizing third-party software.
- Ensure a fully executed non-disclosure agreement has been obtained prior to providing confidential information to external parties.
- Protect confidential information entrusted to us by our clients, subcontractors, and suppliers with the same care as Technip Energies' confidential information.
- Follow our processes for identifying, capturing, and publishing information about our technical innovations. Disclosing new ideas too soon could jeopardize our ability to obtain patent protection for our innovations.
- Submit invention disclosures related to new ideas to the legal department in a timely manner. Intellectual property developed by an employee, in the course of their employment, belongs to and is an asset of Technip Energies.
- Remember to always promptly execute assignment documents required to protect our intellectual property.
- Collaborate with caution. Sharing information about our technological developments and innovations with others, even our clients, can erode our ability to protect those innovations.
- Discuss the use of third-party intellectual property or confidential information with your legal department.

- Promptly report potential violations of our intellectual property to your Legal department.
- Comply with the use of Technip Energies' brand guidelines. See the *corporate image and brand* section for more information.
- Remember, your confidentiality obligations continue after you leave Technip Energies.



## Never

- Divulge a previous employer's confidential or proprietary information.
- Provide information about a new service or product to an external party before a patent application has been filed or the Intellectual Property department has decided not to pursue a patent and authorized the disclosure of the information (e.g., determined it will not be protected as a trade secret).
- Discuss Technip Energies' confidential or proprietary information with third parties, except when such discussions are covered by a duly approved and executed confidentiality agreement.
- Disclose a third party's proprietary information when Technip Energies has an obligation to keep it confidential.
- Download software code or documentation without first obtaining approval from IT or the Legal department.

# Accurate books and records

**“Accurate books and records” refers to all the financial and non-financial business information that we record and report. These records must be compiled honestly, accurately, exhaustively, and objectively to protect our credibility and reputation, meet our legal and regulatory obligations, fulfill our responsibility to shareholders and other stakeholders, and inform and support our business decisions and actions.**

**While our work to ensure accurate books and records is most visible in the Finance, Treasury, Accounting, Payroll, Tax, and Controlling departments, all employees play a role in ensuring the accuracy and completeness of our financial information.**

## **How to behave**

When you are making a financial transaction, creating purchase orders, completing your timesheet, or filing an expense report, you are creating a financial record that needs to comply with the “Always” and “Never” (page 31). We do not tolerate fraud.



**Always**

- Make accounting decisions based on Technip Energies' financial standards and recognized accounting standards.
- Speak to your Controller if you are uncertain of the right way to record or report a transaction.
- Inform your supervisor when you believe a record or report does not accurately reflect the underlying transaction.
- Report any concerns or irregularities concerning accounting, auditing, or internal controls to your line manager first. If you feel that this does not resolve the issue, consider using one of the other reporting channels as indicated on page 12 of this Code.
- Be conscious of the confidential nature of the financial information you handle. Do not give or grant access to confidential information to outsiders or use it for personal gain. If in doubt, ask your manager before you distribute information.
- Know the external and internal reporting standards and ensure they are followed.
- Ensure that all transactions are properly authorized and recorded accurately and completely.
- Submit, record, and authorize only valid transactions.
- Record transactions in a timely manner, minimizing the risk of errors caused by delays between transactions and their recording.

- Ensure that all counterparties are appropriately recorded in our company's systems. This includes clients, suppliers, agents, professional advisers, joint-venture partners, and any other business partners.
- Ensure that no undisclosed or unrecorded amount, fund, or asset is established or maintained.
- Watch out for unauthorized payments or invoices as described in the anti-corruption section of this Code.
- Ensure that all books and records are supported by documentation to provide an auditable record of the transaction.
- Cooperate fully with all reviews, including internal and external audits.
- Create records that are up to date, accurate, reliable, verifiable, and in line with applicable rules, laws, regulations, and company policies.
- Present fair, complete, accurate, timely, and understandable reports for internal and external users.
- Safeguard company assets to minimize risk of financial loss.
- Develop and maintain robust costing systems that provide high-quality financial information and support the company's strategic management initiatives.



**Never**

- Falsify a report, document, or record, or make a deliberately false or misleading entry.
- Record invalid transactions; especially if they are likely to defraud anyone of money, property, or honest services.
- Establish accounts, companies, or arrangements to circumvent or frustrate Technip Energies' controls, policies or procedures.
- Influence others to do anything that could compromise the integrity of Technip Energies' financial records and reports.
- Commit Technip Energies to contractual or other financial obligations unless you are authorized to do so.
- Process transactions without proper validation.
- Sell, transfer, or dispose of company assets without the proper documentation and authorization.
- Obstruct or influence the authorized activities of a regulator. This might include concealing, altering, destroying, or tampering with information.



## Warning signs

“The expense report includes incomplete and inaccurate expenses.”

Beware of any activities that do not respect the following principles:

- **Authorization.** The transaction you are recording or the information you are distributing has been authorized by the correct person(s).
- **Validity and clarity.** Our financial records should reflect only events that have actually happened, or events we know with a high degree of certainty will happen.
- **Appropriate accounting treatment.** Records and reports are created in line with the applicable rules, which are consistently applied.
- **Completeness and accuracy.** The information captured in our financial (and non-financial) systems, including business expenses, must be complete and accurate.
- **Dissemination of information.** Exchange information with your colleagues in all applicable entities, locations, and departments in relation to the events and transactions you are recording while respecting the rules of confidentiality.
- **Timeliness.** Every manager should establish firm but realistic timelines for processing financial records and set deadlines for financial reporting, and employees should strive to adhere to them.

# Information security

**Information security aims to preserve the confidentiality, integrity, and availability of our data to reduce the risk and the impact of potential threats to our business and operations.**

**Protection of Technip Energies' know-how is crucial to safeguarding our business and competitiveness every day. Information security seeks to protect our expertise and reduce the risk of IT disruptions.**

## How to behave

Comply with the security standards and the rules related to the use of our information systems and IT equipment. Learn about internal control procedures and contractual confidentiality clauses, especially on, but not limited to, projects. Read information security news and alerts from the Security and IT departments.

It is important to read all company awareness information, take all mandatory iLearn cybersecurity training, and remain vigilant when handling emails, browsing the web, or on the phone.



## Always

- Be suspicious of emails and phone calls, especially from someone you don't know, from inside and outside our company.
- Be wary of emails that contain a link, and always be cautious when clicking on a link.
- Remain vigilant and report any potential incident involving confidential or sensitive information to your manager, IT, or the Ethics & Compliance department.
- Keep a discreet attitude in all circumstances.
- Take care of confidential and personal data.
- Keep Technip Energies' data on Technip Energies' IT systems.
- Contact IT at [Cyberthreat@ten.com](mailto:Cyberthreat@ten.com) in case of suspicion or doubt.
- Store your professional data on the Technip Energies OneDrive repository to prevent loss.
- Use your Technip Energies email address to register on websites for private use.
- Use the same password for all websites.
- Disclose your travel plans on social media.
- Leave your laptop or smartphone unattended in a public area.
- Give any information about Technip Energies to unknown persons over the phone.
- Use company assets for personal gain.
- Store personal information on your company devices and expect that information to remain private.
- Use public Wi-Fi hotspots, as wireless is inherently insecure.



## Never

- Share your password with anyone, including the Technip Energies IT helpdesk support team.
- Open links or attachments in suspicious emails and text messages (including QR codes).
- Send any work-related data to your personal email address.
- Connect to your Technip Energies mailbox from a public computer.
- Use public sharing websites to exchange work-related data or professional documents.
- Enter confidential information into online translation tools.

## Warning signs

“The email indicates that it comes from a reputable company, but it originates from a private email address.”

Most cyberattacks come through one of three channels:



### Email

A malicious email usually has the following characteristics:

- It contains an attachment and/or a link to an external website.
- It comes from an external email address.
- It looks like it was sent by a well-established institution (including Technip Energies).
- It is demanding urgent action.
- It contains poor grammar, spelling errors, and an unfamiliar greeting or salutation.
- It requests login credentials, payment information, or sensitive data.
- It has offers that are too good to be true.
- There are always inconsistencies in email addresses, links, and domain names.



### Web

Be vigilant when you browse the web.

- Do not click on a link that seems suspicious, and do not download any file from an untrusted source.
- A secure URL always begins with “HTTPS” instead of “HTTP”. Never click on a HTTP website.
- Never share your professional email address with any web servers.
- Never click on pop-up windows asking for your credentials.



### Phone calls

External fraudsters may try to obtain information about Technip Energies via a phone call. Watch out if:

- An external number appears on your phone’s caller ID.
- The caller takes on the identity of someone in Technip Energies or one of its partners.
- If you have any doubt about the caller, ask for a phone number and call it later.
- Never agree to do things under demand for urgent action.

To cross-check that a phone call is from a legitimate Technip Energies employee, try contacting the person the caller claims to be, by phone or email.

# Artificial intelligence

**Technip Energies, as a forward-thinking organization, views artificial intelligence (AI) as a key lever to drive business transformation and innovation. We understand the potential risks associated with the use of AI, and established a framework to ensure that our AI practices are ethical, transparent, and accountable.**

## How to behave

At Technip Energies, we are committed to the responsible deployment of AI within our company. The responsible use of AI is based on fairness, non-discrimination and the protection of privacy, among other things. We will not use AI to discriminate against any individual or group based on their race, gender, beliefs, or any other protected characteristic. We will also ensure that our AI systems are transparent and explainable, so that our employees and clients can understand how decisions are made.

Furthermore, we take steps to protect the privacy of our clients and employees by ensuring that their personal data is used only for legitimate purposes and is kept secure, in compliance with applicable laws. We also have a process for addressing any concerns or complaints related to our AI practices.

We believe we can harness the power of AI to drive innovation and growth while also ensuring that our practices align with our Values and internal requirements.



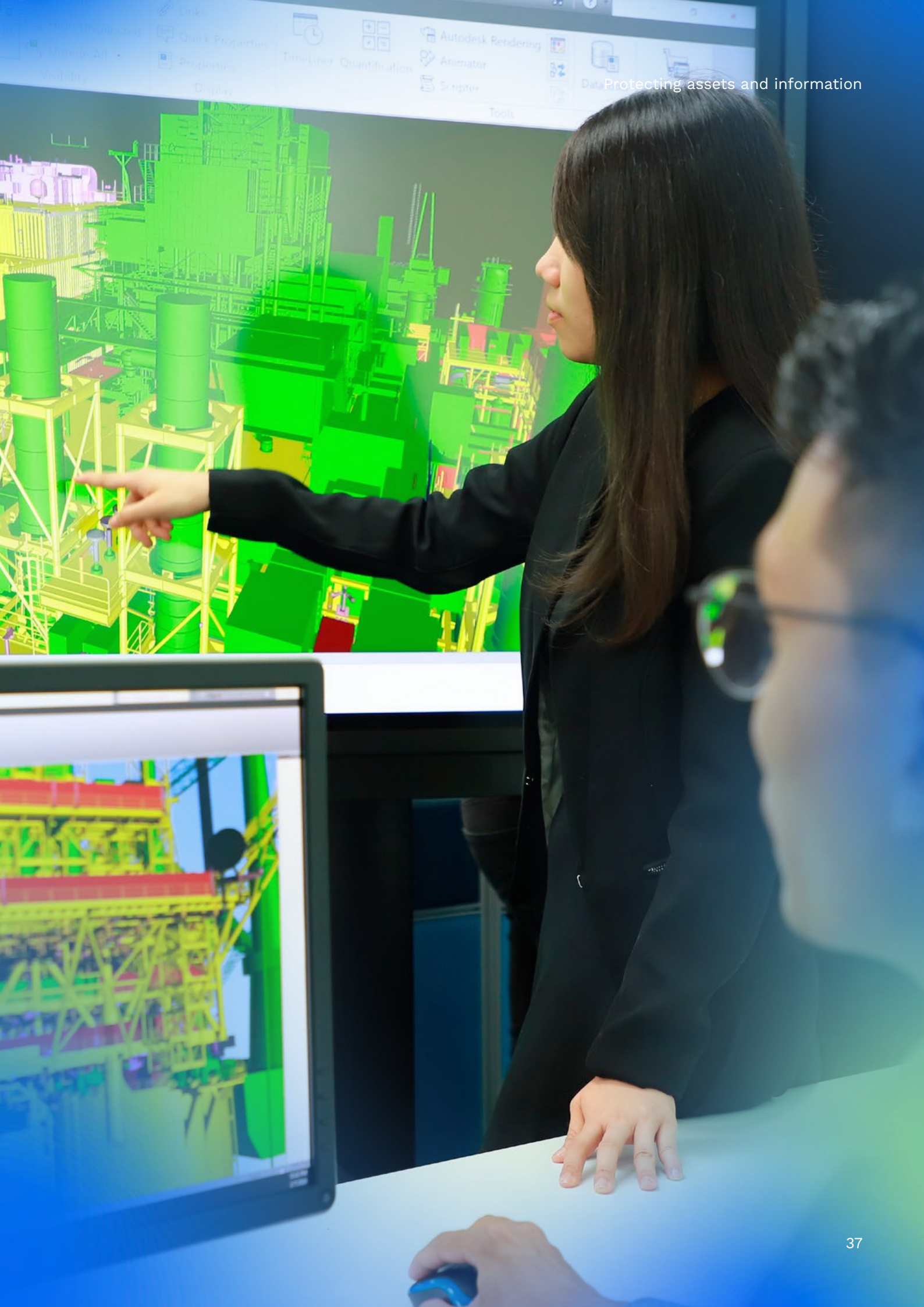
### Always

- Ensure that any use of AI products or tools is done in accordance with the principles contained in this section of the Code or Technip Energies' internal requirements.



### Never

- Use AI as a means of discriminating against an individual or a group.
- Use Technip Energies information on an AI that is not approved by Technip Energies.





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**We are committed to protecting the privacy and personal data of employees and other individuals.**

# Privacy and personal data

**Personal data is any information relating to an individual who is, or can be, identified.**

**Technip Energies is committed to processing personal data responsibly and protecting personal data in its information systems through appropriate privacy and security practices.**

## How to behave

We are committed to protecting the privacy and personal data of employees and other individuals (including but not limited to employees of clients, partners, and suppliers).

We apply strong principles when processing personal data, which include purpose specification, data minimization, data accuracy, storage limitation, appropriate security safeguards, transparency, and accountability.



### Always

**If you are authorized to access personal data, you must:**

- Only process personal data with a valid business purpose and use it consistently with that purpose.
- Adhere to the appropriate standards of confidentiality when using personal data.
- Ensure the individuals whose personal data are being processed are adequately informed.
- Ensure the personal data processed is and remains accurate.
- Ensure that such information is not provided to anyone outside or within Technip Energies without the proper authorizations.
- Hold the information for only as long as necessary, considering the business purpose for which the authorization was given.
- Immediately notify the Ethics & Compliance department at [privacy@ten.com](mailto:privacy@ten.com) if you suspect or become aware of a personal data breach.
- Provide notice to individuals about the use of their personal data, as appropriate.
- Only collect the information that is necessary to perform your work.

- Secure personal data processing with technical and organizational measures as adequate to the processing. This includes, in particular, measures to protect against accidental loss, destruction or damage, unauthorized or unlawful processing, accidental disclosure, and unauthorized access.
- Transfer personal data internationally in compliance with applicable privacy laws. Contact Legal and/or Ethics & Compliance at [privacy@ten.com](mailto:privacy@ten.com) should you have a question or concern.



### Never

- Collect information just in case it may become useful someday.
- Retain personal data for longer than is necessary, considering the business purpose for which it was collected.
- Collect or use sensitive personal data (such as health or medical information) without following appropriate policies and procedures.

# Insider trading and stock tipping

During our work, we sometimes learn information about Technip Energies, our clients, subcontractors, or suppliers that has not yet been made public. If we were to make stock transactions based on this “inside information” before it is disclosed to all investors, we would have an unfair advantage.

Using non-public inside information for your personal benefit (including stock market transactions) is called “insider trading.” Passing non-public inside information along to others, even family members, so that they may use the information for personal gain is called “stock tipping.” These practices erode investor confidence and violate this Code and the law.

## How to behave

You should not use insider information for your personal benefit or allow third parties to gain a personal benefit.



### Always

- Keep all non-public inside information about Technip Energies confidential.
- Treat all non-public inside information about our clients and suppliers with the same degree of confidentiality you would give Technip Energies’ information.
- Respect all “blackout notices” that prohibit buying or selling Technip Energies stock during certain periods when you are subject to them.



### Never

- Conduct stock transactions based on non-public inside information.
- Pass along non-public inside information to others or procure any form of Technip Energies securities based on non-public inside information.

## Good to know

# How do I know if information is inside information or not?

Information is considered “inside information” if it is:

- non-public;
- of a precise nature, *i.e.*, specific enough to enable a conclusion to be drawn as to the possible effect of such information on the stock price; and
- likely to have a significant effect on the price, meaning a reasonable investor would consider that information important in making a decision to buy, hold, or sell stocks.

Examples of inside information include projections of future earnings, loss of a significant project, or other sensitive business plans or strategies.

Any information that could be expected to affect Technip Energies’ stock price, whether positively or negatively, should be considered “inside information” and not be shared with anyone.

# Protecting business and brand

<b>Anti-corruption and influence peddling</b>	<b>44</b>
<b>Gifts, hospitality, and sponsored travel</b>	<b>48</b>
<b>Donations and sponsorships</b>	<b>51</b>
<b>Conflict of interests</b>	<b>52</b>
<b>Anti-money laundering</b>	<b>55</b>
<b>Tax Policy</b>	<b>56</b>
<b>Trade compliance</b>	<b>58</b>
<b>Competition and antitrust laws</b>	<b>60</b>
<b>Quality leadership</b>	<b>62</b>
<b>Political activities</b>	<b>63</b>
<b>Corporate image and brand</b>	<b>64</b>
<b>External communications</b>	<b>65</b>
<b>Social media</b>	<b>66</b>



**TECHNIP  
ENERGIES**

# Anti-corruption and influence peddling

At Technip Energies, we compete fairly on the strength of our technology, service, and execution excellence. We forbid all acts of corruption (including bribes, facilitation payments, kickbacks, and self-dealing) and influence peddling.

We have a zero-tolerance approach to any form of corruption and influence peddling.

Corruption refers to offering or accepting, directly or indirectly, any advantages, to induce those in public or private sectors to perform, refrain from performing, or facilitate any act within their activity, function, position, or office. We do not make or accept improper payments to obtain or retain business with those in public or private sectors or as a reward for awarding contracts.

We prohibit influence peddling. Influence peddling includes offering anything of value, to a person, so that this person abuses their actual or perceived influence to obtain a favorable decision, from a public official, for the benefit of Technip Energies.

We are committed to complying with all international and national legislation against illegal payments, including prohibitions on facilitation payments (to expedite routine and administrative government action) except in extraordinary circumstances when the safety or security of an employee is in immediate danger.

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**We compete fairly on the strength of our technology, service, and execution excellence.**

## How to behave

Anyone responsible for acts of corruption or influence peddling is subject to disciplinary action, up to and including termination of employment, as well as legal action, in accordance with applicable laws and regulations.

Code of Business Conduct training is mandatory for all employees. In addition, employees most exposed to corruption and influence peddling risks undergo specific training sessions on a regular basis.



### Always

- Contact Ethics & Compliance for guidance if you are unsure which compliance procedure to apply or course to follow.
- Ensure that records of expenditures properly reflect the nature of any transactions you get involved in.
- Select business entertainment venues and activities in line with our Values.
- Conduct appropriate due diligence on consultants, suppliers, subcontractors, business partners, and commercial intermediaries, and ensure that such third parties understand and abide by Technip Energies' policy of zero tolerance for corruption.
- Pay all consultants, commercial intermediaries, and business partners in the country where they perform work.
- Use the reporting channels to promptly report any act of corruption or any attempt to conceal corruption.
- Seek advice from your manager or the Ethics & Compliance department if you have any doubt about any transaction which you have been requested to make or for that in which you may participate.



### Never

- Make payments or provide anything of value such as gifts, loans, discounts, and excessive hospitality, or use Technip Energies' funds or assets to improperly influence a decision under any circumstances.
- Offer, give, promise, or solicit — either directly or indirectly — any payment or supply of services, gifts, or entertainment to obtain or retain a market or competitive advantage. This rule applies to transactions with public officials, companies, and private persons.
- Offer anything of value, to a person, so that this person abuses their actual or perceived influence to obtain a favorable decision, from a public official, for the benefit of Technip Energies.
- Act in a way that may violate local law or the client's own rules and business guidelines.
- Provide anything of value that creates the appearance of impropriety.
- Provide anything of value to gain or retain an improper advantage.

## Warning signs

“I’m not sure why my client is involving his brother – a public official – in our project.”

When dealing with business partners, we may encounter warning signs that the business partner may be making improper payments or is otherwise exerting undue influence over decisions to award or retain business.

These warning signs (sometimes referred to as “red flags”) include:

- A request by a commercial consultant to have a commission paid before the announcement of an award decision.
- Unwillingness by a third party to reveal its ultimate ownership structure.
- A request from a representative of a country’s customs authorities for a payment or a thing of value (gifts, entertainment, travel) in return for the issuance of the authorization of importation of equipment in connection with a project.
- Compensation requests not in line with services provided.
- Lack of support for services vaguely described in invoices or the inability to provide details of the actions taken on behalf of Technip Energies.
- Requests for payment in a country other than where the service was provided.
- Involvement of government officials, including family members or other relatives of public officials, in a transaction.
- Receipt by a Technip Energies employee of a gift from a supplier during an ongoing tender, in which the supplier is participating.

**If you observe any warning signs, promptly contact Ethics & Compliance for assistance in resolving the issue.**

## Good to know

# Who is considered a public or government official?

These terms are broadly interpreted to include any person working for a governmental or state body, any political party candidate, and any business owned and/or operated by a state. In addition, “government” includes all branches, levels, and subdivisions of any government.

### Public or government officials include but are not limited to:

- Any elected or appointed government official or representative.
- A current or former employee, official, contractor, consultant, or representative of a government or any department, agency, or state-owned or state-controlled enterprise.
- Any person acting for or on behalf of a government official, agency, or enterprise performing a governmental function.
- Any political party, officer, employee, or person acting for or on behalf of a political party or candidate for public office.
- A person in the service of a government, including members of the military, police, or civil service.
- Family members and relatives of any of the above.
- An employee or person acting for or on behalf of a public international organization, e.g., United Nations.

# Gifts, hospitality, and sponsored travel

**Technip Energies never offers, solicits, gives, or receives gifts or hospitality to improperly influence the recipient to obtain or retain business or provide a business advantage for Technip Energies, as such practice amounts to corruption.**

## How to behave

If you are presented with a gift or offered hospitality or entertainment, or if you are offering someone a gift, hospitality, or entertainment, you need to ensure they comply with Technip Energies' internal requirements.



### Always

- Refuse and notify your manager promptly if a third party offers you lavish gifts or invitations.
- Inform your business partner about Technip Energies' policy on gifts and hospitality at the beginning of every new business relationship.
- Seek and receive appropriate internal approval before offering gifts or invitations.
- Document and register all gifts or hospitality given to or received by government officials.
- Understand local customs and laws before offering or receiving gifts, leisure activities, or other benefits.
- Ensure that any gift, hospitality, or sponsored travel offered does not breach the company policy of the person receiving the gift, hospitality, or sponsored travel.
- Make sure all gifts offered and received are supported by accurate documentation, including invoices and receipts, when applicable.
- Seek advice from your manager, Legal, or Ethics & Compliance if you are not completely sure.
- Seek approval before paying for third-party travel expenses or accepting payment for your travel expenses from a third party.



### Never

**Offer or provide, solicit, receive, or accept gifts or hospitality:**

- To or from any government official, client, supplier, vendor, subcontractor, or any other third party not in line with our internal requirements.
- In the form of cash or cash equivalent.
- Which may influence decisions, or be seen as having an influence on those receiving them.
- That you would not be comfortable explaining to your colleagues, your family, or the media.
- Even if they are of minimal value, with frequency that can create the appearance of impropriety when aggregated.
- To or from government officials without prior approval.
- To or from third parties who could place you in a situation of obligation, especially during critical phases of a decision-making or award process.
- That exceeds what is considered acceptable at Technip Energies.

## Warning signs

**“My supplier wants to give my wife and I tickets to the theater and have dinner at his expense.”**

Some gifts and hospitality are, by their nature, illicit and thus prohibited by Technip Energies. These include cash payments, personal services, loans, gifts, invitations of an improper nature, or to inappropriate places or events, meals in which the commercial partner does not participate, and gifts or invitations during periods when important commercial decisions are being made.



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When contributing to local communities on behalf of Technip Energies, ensure that any donations or sponsorships are in line with our Values and Purpose.

# Donations and sponsorships

Donations are gifts given for a charitable purpose or to support a particular cause. A donation can be monetary or in the form of services, or new or used goods. They also include emergency or humanitarian aid, development aid support, and medical care assistance.

As a responsible corporate citizen, Technip Energies believes in contributing to the communities where we conduct business by supporting worthy causes, organizations, and activities that align with our stakeholder commitments and sustainability objectives.

However, in certain circumstances, donations and sponsorships could be considered disguised illegal payments. To avoid these risks, Technip Energies only takes part in donations and sponsorship projects where activities are legally acceptable and in line with our Values and Purpose. Any donation or sponsorship on behalf of Technip Energies must be approved in accordance with the relevant internal requirements concerning social donations and sponsorships.

## How to behave

When contributing to local communities on behalf of Technip Energies, ensure that such initiatives are in line with our internal requirements. All approved donations and sponsorships must be properly accounted for and accurately reported in the company's books.



### Always

- Ensure that donations and sponsorships are not provided to improperly influence a third party directly or indirectly, or to obtain a business advantage.
- Promote the development of local communities through donations that are in line with our internal requirements.
- Make all donations and sponsorships in good faith and ensure that proper approvals are obtained in line with the company's internal requirements.



### Never

- Give donations or sponsorships that are unreasonably large in value, or which can be perceived as trying to improperly influence the recipient to obtain or retain business for Technip Energies.
- Give any donation or sponsorship if it is illegal under local laws and regulations.
- Provide a donation in cash or cash equivalent (such as gift cards or vouchers).

# Conflict of interests

**A conflict of interest may occur when an employee has a financial, business, or personal interest or activity that interferes, appears to interfere or could interfere with Technip Energies' interests. There are many situations that are or could be perceived as conflict of interests requiring an appropriate response.**

## How to behave

You are expected to make informed business decisions in the best interest of Technip Energies. Any situation in which your personal interests, or the interests of your close relations, are or appear to conflict with Technip Energies' interests must be avoided.

### Financial interests

- A close relative is an owner or investor in a privately owned client of Technip Energies.
- You accept expensive event tickets or gifts from a supplier or client.
- You learn about a business opportunity at work and decide to pursue it for yourself.

### Personal relations

- You are considering hiring a close relative or partner as an employee or contractor.
- You have a relationship with a supplier that inappropriately influences your business decisions.
- Any other situation where a potential conflict of interest will lead to a violation of your contract of employment and duty of good faith vis-à-vis your employment with Technip Energies.

### Political relationships

- You work on a political campaign during business hours.
- You direct a third party, in a business engagement with Technip Energies, to donate to a political organization in which you are involved.



## Always

- Act only in Technip Energies' interest when conducting professional activities. Refrain from taking advantage of any situation, either directly or through a third party, for your own gain or that of others.
- Disclose in writing and obtain approval from your manager and People & Culture with respect to any outside interests that create or may create a conflict of interests.
- Remain aware of any actual or apparent conflicts and promptly address, when it arises, any conflict of interests with your manager and People & Culture.
- Know how to remove yourself or protect against the dangers a conflict of interests presents, such as removing yourself from the position that creates the conflict by delegating to someone else.
- Take every opportunity to train yourself on the internal requirements regarding conflict of interests.



## Never

- Misuse Technip Energies resources for personal gain or for the gain of a third party. This includes Technip Energies office equipment, time, and intellectual property. Any information you obtain through your position at Technip Energies should not be used for personal gain or for the gain of a third party.
- Assume that a conflict does not matter because it is too small or petty.

## Warning signs

**“He acts as a consultant for a company that competes with Technip Energies.”**

In our work, we may come across a situation that could create a conflict of interests. Warning signs (sometimes referred to as “red flags”) of such a conflict include:

- A close relative works for a supplier or a client.
- You are asked to serve on the board of a competitor, supplier or client’s company.



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**Conduct appropriate due diligence  
on all subcontractors, suppliers,  
consultants, and agents.**

# Anti-money laundering

Money laundering occurs when revenue-generating criminal activity takes place (such as narcotics, bribery, or fraud) and the proceeds of that criminal conduct are acquired, used, or otherwise dealt with.

As part of ensuring that our financial records are accurate, complete, and transparent, it is also necessary for us to exercise appropriate diligence on clients, subcontractors, suppliers, and other vendors to prevent money laundering.

Appropriate due diligence also prevents “reverse money laundering,” whereby legitimate funds may be used, knowingly or unknowingly, to finance terrorist activities.



## Always

- Conduct appropriate risk-based due diligence on clients, subcontractors, suppliers, consultants, and agents.
- Ensure that all payments to subcontractors, suppliers, consultants, and agents are made in accordance with our financial standards. The payment due shall be proportionate to the services to be specified in the contract or purchase order; payments cannot be made to any party other than the counterparty of the contract or the purchase order or in a third country different from the country of the parties or the country where the contract, work, or services has/have to be performed as agreed by the parties.
- Ask questions if an agent or consultant proposes a transaction structure that seems unusually complex.
- Be alert to the origin of any money we receive or acquire.
- Check the legitimacy of the destination of any payment we make.
- Be aware of, and report to Ethics & Compliance, any payments that you suspect may be connected to the proceeds of crime.



## Never

- Try to investigate any case of money laundering on your own.
- Reveal your suspicions of money laundering to the other party in the transaction. Seek advice from your manager or Ethics & Compliance instead.

# Tax Policy

**At Technip Energies, we manage tax affairs with integrity to comply with the laws and regulations of all the countries where we operate.**

**As a multinational company, we conduct business in more than 30 countries, engaging with a broad range of stakeholders: clients, partners, subcontractors, and suppliers based around the world. We operate in a constantly changing environment with an increasingly complex set of tax regulations, subject to varying interpretations, thus giving rise to potential tax risk.**

**We are committed to implementing sustainable tax and legal structures aligned with our business needs and not aimed at driving mainly tax benefits.**

**We recognize that all taxes that we pay and collect for governments are an integral element of our corporate social responsibility and therefore of Technip Energies creating shared value.**

**When making a tax decision, we consider the interests of key stakeholders, such as shareholders, employees, suppliers, clients, authorities, and the communities where we operate.**

## How to behave

We should always consider the tax consequences of any business decision to ensure compliance with tax regulations.



### Always

- Respect tax compliance requirements and pay tax in accordance with local regulations in the countries in which we operate, in a timely manner.
- Ensure compliance with transfer pricing policy for all intra-group transactions.
- Align tax decisions with our business activities.
- Keep records supporting all the transactions.
- Seek guidance on local tax regulations when conducting business in a new country.
- Liaise with Technip Energies' internal tax experts when facing a non-routine transaction.
- Consult with external tax advisors when there is uncertainty as to the application or interpretation of tax law.
- Maintain a transparent and collaborative relationship with tax authorities.
- Behave in accordance with anti-avoidance tax regulations global and local frameworks (OECD, EU initiatives on tax transparency and anti-abuse rules, national anti-tax avoidance regulations, etc.).



### Never

- Engage in artificial transactions without commercial substance principally aiming toward tax benefit.
- Pay taxes that are not legally due or that are claimed on an unjustified basis.
- Perform transactions with parties established in tax haven countries without assessing the consequences for Technip Energies.
- Take an important tax-related decision without seeking appropriate advice.
- Consider that tax legislations are stable and not subject to changes.
- Process a tax-related transaction without proper supporting documentation.

# Trade compliance

**As a company with global operations, we provide products, technology, and services to clients, and transact with third parties around the world. We must always comply with the applicable trade restrictions and customs laws, wherever we do business.**

## How to behave

We are committed to complying with all export controls, economic sanctions, trade restrictions, or embargoes, as well as customs laws that apply to Technip Energies, wherever we do business.



### Always

- Comply and ensure that third parties working for and on behalf of Technip Energies comply with any applicable trade compliance-related regulations, wherever Technip Energies does business.
- Comply with all Technip Energies internal requirements when engaging in business transactions and in performing import or export activities.
- Ensure required due diligence is conducted and that all transaction parties are screened against relevant restricted party lists.
- Verify export license requirements before exporting a product or sharing technical information or software from one country to another.
- Consult with Legal or Ethics & Compliance immediately if you have any doubts about Trade Compliance topics.



### Never

- Execute a cross-border shipment without conducting the requisite due diligence and complying with all applicable Technip Energies processes and procedures.
- Carry Technip Energies equipment or spare parts in your luggage.
- Engage or transact with a sanctioned country, legal entity, or individual.

## Good to know

Most of the countries where we operate or conduct business have their own customs laws and foreign policy-based trade controls, including economic sanctions and embargoes, that may govern the import or export of the products or services that we offer, procure, or supply. Restrictions under trade control laws can target specific countries and business sectors within countries, as well as individuals and organizations. Some countries may also have laws requiring the boycott of other countries, while others have laws that prohibit participating in boycotts.

The penalties for breaching these laws can be severe and may include large fines, revocation of export license privileges, debarment, disqualification of directors, and imprisonment.

# Competition and antitrust laws

**At Technip Energies, we uphold the highest standards of business conduct, ensuring fair competition and compliance with all relevant laws and regulations in the countries where we operate.**

**Competition and antitrust laws exist globally to protect markets by fostering fair and robust competition and prevent agreements and practices that have the purpose or effect of limiting competition in a market.**

These laws vary by country but generally aim to:

- **Prevent collusion between companies** (fix prices, make rigged bids, establish output restrictions or quotas, share or divide markets by allocating clients, suppliers, territories, or lines of commerce).
- **Address dominant market power by regulating companies with significant market influence to prevent abuse.**
- **Review transactions by assessing mergers and acquisitions for their impact on competition.**
- **Promote fairness by ensuring efficient players can compete without undue advantages.**

At Technip Energies, we expect all our employees, regardless of their role or position, to conduct our business with unwavering honesty, integrity, and fairness, and to offer opportunities for success to all our suppliers, partners, and subcontractors in a spirit of fair competition and mutually beneficial collaboration.

Non-compliance with competition and antitrust laws may result in severe financial penalties, criminal charges (including fines and imprisonment), and reputational damage for both Technip Energies and individuals.



### Always

- Familiarize yourself with competition laws relevant to your business and jurisdiction. Ask Legal for advice.
- Carefully note the origin of any information you may collect on the market regarding competition.
- Consider whether the reasons for entering into an agreement with a competitor are legitimate.
- Ensure you have an agenda before meeting with a competitor. Accurate minutes shall be prepared, shared, and retained after the meeting.
- Leave any industry meeting or other events if competitively sensitive issues arise. Ensure your departure is recorded and immediately report the matter to the Legal department.
- Pay close attention to exclusivity agreements and other similar agreements.
- Pay close attention to the existence and functioning of purchasing groups that the company aims to join.
- Seek guidance from the Legal department if you deal with Research & Development (R&D) or transfer technology agreements.
- Without prejudice to your personal freedom of association, seek guidance from the Legal department and obtain approval from the proper level of management before entering any trade association.
- Speak up if you are aware of any potentially anti-competitive practices or if you are not certain whether or not those practices are legally compliant.



### Never

#### Agree with competitors to:

- Exchange information, by any means whatsoever, regarding prices, sales volumes, terms of sale (including contractual terms), market shares, production capacities, or cost structure.
- Discuss the commercial or industrial policy of Technip Energies.
- Participate in collective actions aimed at, or having the effect of, preferring or eliminating a competitor, granting it preferential treatment, or exercising pressure or retaliatory measures.
- Agree with third parties to boycott any client or supplier, except in connection with internationally imposed governmental sanctions.
- Abuse purchasing power, including prohibiting work with or otherwise discriminating against specific suppliers or clients, unless legitimately and objectively justified.
- Communicate or exchange information with competing buyers regarding our purchasing policies.
- Give any confidential information about a supplier to its competitors.
- In the context of mergers and acquisitions subject to clearance by the competition authorities, start to coordinate the activities or begin the integration of a target's business before the transaction is cleared.

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**We are committed to competing fairly and in compliance with applicable competition and antitrust laws.**

# Quality leadership

Quality leadership refers to the value of outputs that we deliver to our internal customers and external clients. The products, services, and projects should all contribute to optimal, reliable, and safe results that meet requirements each and every time.

Technip Energies' goal is to be a leader in our industry by providing excellent and sustainable quality in whatever we do, and maintaining reliable products, asset integrity, services, project execution, and installation life cycle.



## Always

- Know and comply with our Quality Policy.
- Cultivate a culture of quality leadership through consciously meeting requirements, and continuous learning and improvement through an empowered workforce.
- Drive accountability and ownership for a prevention mindset at all levels within the organization.
- Engage with improving the processes that you operate.
- When working with our supply base, ensure that our suppliers constantly meet requirements and drive a culture of continuous improvement with a prevention mindset.
- Follow documented processes when executing work (Global Business Performance Management System (GBPMS)).
- Track conformance and identify issues when they occur.
- Address all non-conformance issues through root cause analysis and cost of non-quality reporting.
- Aim to do things better, faster, and more cost-effectively while always respecting applicable standards and requirements.
- Intervene if quality behaviors and standards are not demonstrated. Stop the task if a quality risk exists.
- Take personal accountability for performing and improving your job through leadership competencies that improve business results.
- Foster the data collection into our quality reporting tool (INTELEX) and ensure our quality of data.

# Political activities

**Technip Energies observes strict political and religious neutrality. We do not make any financial contributions to political candidates, elected representatives, or representatives of elected officials, political parties, members of governments and their advisors, or religious institutions.**

**In addition, Technip Energies may represent its interests in the countries where it operates.**

## Technip Energies:

- Abides by applicable legal requirements regarding representation of its interests;
- Will not, and undertakes not to encourage public decision-makers to, breach the rules of conduct, in particular regarding conflict of interests, confidentiality, and compliance with ethical obligations; and
- Performs any required legal reporting, as part of the representation of its interests.

Technip Energies also respects the personal political affiliations of its employees. Nevertheless, these affiliations must not affect the activities or image of Technip Energies, nor may they affect the company's political neutrality.



## Always

- Participate in political activities in your own name and outside of work.
- Respect the beliefs of others.
- Refrain from and recuse yourself from political decision-making processes that concern Technip Energies.
- Exercise your freedom of opinion and political activity outside the scope of your employment, at your own expense, and on an exclusively personal basis.
- Explain clearly that you represent only your own personal views when participating in political activities.
- Get your manager's approval before communicating in Technip Energies' name with government representatives on political matters.
- Think of Technip Energies' reputation and how the public would perceive your actions when interacting with government representatives.
- Seek advice from your manager or Ethics & Compliance if you are solicited for a political donation.
- Notify your manager if a government official contacts you outside your normal activities.



## Never

- Use Technip Energies' premises, equipment, or any other assets for political activities.
- Make a political statement on behalf of Technip Energies or associate Technip Energies with your personal political views.
- Use Technip Energies' corporate image to support your political views.
- Use your position at Technip Energies to urge anyone to make political contributions or to support a political party.
- Use or allow the use of Technip Energies' assets or resources for a political campaign, party, or candidate.
- Use donations for community benefit to hide political contributions.

# Corporate image and brand

**Our brand is an asset we need to protect.**

**It is what makes us unique to our stakeholders. It is the personality that we express not only through our visual communications, but also through our collective and individual behaviors.**

## How to behave

You have a role to play in protecting and preserving our image. You are an ambassador of Technip Energies and, as such, you must behave in conformity with our principles as detailed in this Code.

Everyone in Technip Energies is a brand ambassador, and each of us must maintain and protect Technip Energies' reputation. Consistent communication with all our stakeholders is the foundation for our brand, our corporate image, and our commercial success.



## Always

- Act as a brand ambassador and behave in conformity with our principles as detailed in this Code.
- Maintain and protect Technip Energies' reputation.
- Contact the Corporate Communications department or your local communication manager in case of any doubt.

# External communications

Given our global presence, financial market reporting regulations, and renowned technical expertise, Technip Energies must be particularly vigilant with respect to external dissemination of information. Any misinterpretation could negatively affect the company's image and financial performance.

## How to behave

Only employees authorized by the Corporate Communications and Investor Relations departments can be external spokespersons for Technip Energies.

On social media, you may relay any information that is public, meaning it has been published on Technip Energies' website or on Technip Energies' official social media accounts.



## Always

- Share information with care, with whomever you meet.
- Disclose only information that is public, meaning it has been published on Technip Energies' website.



## Never

- Speak to the media about Technip Energies if you are contacted by a journalist, unless authorized by Corporate Communications.

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**We must be particularly vigilant with respect to external dissemination of information.**

# Social media

**Social media channels are online networks enabling users to create, publish, share, and live stream ideas and content. They have changed the way we communicate, work, and live.**

**Everything our employees post about Technip Energies can have an impact on the company's reputation. Social media should therefore be used responsibly.**

## How to behave

Do verify facts before sharing information regarding Technip Energies.

Protect information, confidentiality, privacy, and intellectual property. Technip Energies' rules apply to social media, and your obligations as a Technip Energies employee are the same in the digital world as in the physical world.

If you are unsure whether a post is appropriate to share, it is better not to post it at all. Remember, once shared, we may not be able to retract the post.

If in doubt, contact the Corporate Communications department.



## Always

- Ensure that the information you are sharing is accurate and reliable, coming from our website or from official Technip Energies social media accounts.
- Proofread your post before publishing.



## Never

- Share confidential or sensitive information such as financial and commercial data or any information related to ongoing projects, research and development, legal matters, recordings of internal or external meetings, internal company communications, or strategy, that would not be publicly available to journalists, clients, and competitors and all external stakeholders.
- Post comments about persons or companies that could be perceived as negative or defamatory and might damage the reputation of Technip Energies.

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**Everything our employees post about Technip Energies may have an impact on our reputation.**



**Technip Energies N.V.**

A company incorporated under the laws of The Netherlands, with its corporate seat in Amsterdam, registered with the Dutch Chamber of Commerce under number 76122654.

Its principal place of business is located at, Immeuble Origine, 2126 Boulevard de La Défense CS 10266-92741 Nanterre cedex (RCS Nanterre 879 464 584) France