

**Renewable Energy & Human Rights Benchmark 2023
Company Profile**

Company name TotalEnergies
Sub-sector Project developer
Overall score 23.8% weighted average

Section score	Weighting	For section
47.1%	20%	1. UNGP core indicators
19.7%	40%	2. Salient human rights risks
0.0%	20%	3. Serious allegations
32.3%	20%	4. ACT assessment as conducted by the World Benchmarking Alliance*

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found here: business-humanrights.org

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the 2022 CHRB methodology (20% of total)[†]

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Universal Declaration of Human rights (UDHR) [Code of Conduct, 2021: totalenergies.com] Score 2 • Met: Commitment to UNGPs [Code of Conduct, 2021: totalenergies.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles [Code of Conduct, 2021: totalenergies.com] • Met: Explicitly lists all four ILO core principles [Code of Conduct, 2021: totalenergies.com] Score 2 • Met: Expects suppliers to commit to ILO core principles • Met: Explicitly lists all four ILO core principles for suppliers
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to remedy adverse HRs impacts [Code of Conduct, 2021: totalenergies.com] & [Human Rights Internal Guide, 2015: total.com] • Not Met: Expects suppliers to make this commitment Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms

* For information on the ACT methodology and scoring criteria please refer to the [World Benchmarking Alliance](https://worldbenchmarkingalliance.org).

[†] Scores for section 1 have been fully aligned with the 2023 edition of the World Benchmarking Alliance (WBA) Corporate Human Rights Benchmark and detailed explanations are available on the WBA CHRB [website](https://business-humanrights.org).

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Commitment to work with suppliers on remedy
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs [2021 Universal Registration Document, 2022: totalenergies.com] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making [2021 Universal Registration Document, 2022: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments [2021 Universal Registration Document, 2022: totalenergies.com] • Met: Day-to-day resources and expertise allocation in own operations [2021 Universal Registration Document, 2022: totalenergies.com] • Not Met: Resources and expertise allocation in supply chain
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations [2021 Universal Registration Document, 2022: totalenergies.com] & [Challenges identification_web, N/A: totalenergies.com] • Met: Describes process for identifying risks in business relationships <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes global risk identification system incl. stakeholder consultation [Human rights_web, N/A: totalenergies.com] & [Vigilance plan_web, N/A: totalenergies.com] • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks [Vigilance plan_web, N/A: totalenergies.com] • Met: Describes how process applies to supply chain [Vigilance plan_web, N/A: totalenergies.com] • Met: Public disclosure of results of HRs risk assessment [Human rights_web, N/A: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders [Tilenga HRIA, 01/2022: totalenergies.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues [Tilenga HRIA, 01/2022: totalenergies.com] & [Vigilance plan_web, N/A: totalenergies.com] • Not Met: Describes how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HRs issue [Human rights_web, N/A: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken [Tilenga HRIA, 01/2022: totalenergies.com]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions [Tilenga HRIA, 01/2022: totalenergies.com] & [Vigilance plan_web, N/A: totalenergies.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders [Tilenga HRIA, 01/2022: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers [2021 Universal Registration Document, 2022: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware [2021 Universal Registration Document, 2022: totalenergies.com] • Met: Describes how workers in supply chain access grievance mechanism • Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities [2021 Universal Registration Document, 2022: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware [2021 Universal Registration Document, 2022: totalenergies.com] • Not Met: Describes how external individuals/communities access grievance mechanism [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Expects supplier to convey expectation to their suppliers
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified

CSI. Responsible lobbying and political engagement fundamentals

Indicator Code	Indicator name	Score (out of 2)	Explanation
CSI.18	Responsible lobbying and political engagement fundamentals	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Code of Conduct indicates its political engagement: 'We respect the privacy of our employees. With regard to political engagement, employees have the right to participate in political activities on their own right, if they specify clearly that they do not represent TotalEnergies and they notify their line management of any action with the potential to create a conflict of interest'. However, it seems to be focusing on the political engagement of their workers, rather than focusing on the ways in which a company contributes to or participates in the political process. The Company's advocacy directive states that 'TotalEnergies carries out its advocacy efforts in accordance with the values set out in its Code of Conduct, which clearly affirms its ethical commitment. By advocacy, the Company means all efforts conducted directly or indirectly with public authorities, and more generally with all stakeholders concerned by its activities, in order to present its challenges, explain its issues, share its expertise and promote its interests. The Company's advocacy efforts are carried out in accordance with this directive, which cannot be waived under any circumstances.' The document further includes the rules the Company implements in conducting its advocacy efforts. [Code of Conduct, 2021: totalenergies.com] & [TotalEnergies company's advocacy directive: totalenergies.com] • Met: Publicly available policy statement that specifies the Company does not make political contributions: The Advocacy Directive states that 'The Company implements the following rules in conducting its advocacy efforts: [...] Refuse to intervene in the functioning or financing of the political life in the countries in which it is present.' [TotalEnergies company's advocacy directive: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: Disclosure of expenditures on lobbying activities • Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Charter Regarding Indigenous and Tribal Peoples indicates: 'The Total Affiliates shall: Consult with the Indigenous or Tribal peoples and their representatives through the procedures established by host governments, as recommended by ILO standards such as the Convention 169, and in this respect: dialogue with the communities in order to understand their goals, needs, values and constraints; Communicate plans of the operations to the indigenous groups through presentations and local meetings; inform the indigenous groups about the development of the project'. It adds: 'Total acknowledges the criteria provided by the United Nations Development Programme (UNDP) and the World Bank standards to characterize Indigenous Peoples'. However, the commitment is expected to explicitly make reference and commit to respecting the rights outlined in the UN Declaration on the Rights of Indigenous Peoples including value chain. The Human Rights Guide makes reference to the UN Declaration on the Rights of Indigenous Peoples, however, no commitment to it was found there either. The Company has provided feedback for this subindicator, however, the documents is considered outdated according to the three-reporting-year timeframe policy. [Charter Regarding Indigenous and Tribal Peoples, N/A: totalenergies.com] & [Human Rights Internal Guide, 2015: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of process for identifying indigenous persons and customary lands.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Commitment to FPIC (in line with ILO No.169): The Charter Regarding Indigenous and Tribal Peoples indicates: 'Total acknowledges the criteria provided by the United Nations Development Programme (UNDP) and the World Bank standards to characterize Indigenous Peoples'. It adds: 'The Total Affiliates shall: Consult with the Indigenous or Tribal peoples and their representatives through the procedures established by host governments, as recommended by ILO standards such as the Convention 169, and in this respect: dialogue with the communities in order to understand their goals, needs, values and constraints; Communicate plans of the operations to the indigenous groups through presentations and local meetings; inform the indigenous groups about the development of the project'. The Registration Document indicates: 'TotalEnergies acknowledges the specificities of the rights of indigenous and tribal peoples (International Labor Organization Convention No. 169) and has developed a framework which defines principles to be followed with these communities. It encourages the use of experts in order to identify and understand these peoples' expectations and specificities, to consult them and to contribute to their socio-economic development'. The Human Rights Guide indicates: 'There is no universal definition of indigenous peoples. In fact, the international community has not adopted a formal definition, and the term is still controversial in some countries. The main criterion to identify indigenous peoples is self-identification. Several characteristics of indigenous peoples have been outlined, including by the United Nations: Historical and geographical pre-establishment of these people within a given area of land; Past or present experiences of marginalization and discrimination; Cultural difference – in terms of use of a language or way of life that differs from the rest of the majority population; Self-identification – recognising oneself and being locally recognised as such'. No evidence found, however, of commitment to FPIC. [Charter Regarding Indigenous and Tribal Peoples, N/A: totalenergies.com] & [Human Rights Internal Guide, 2015: total.com]</p> <ul style="list-style-type: none"> • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2022 Universal Registration Document indicates EACOP's [East African Crude Oil Pipeline Ltd] 'approach with these groups [the Akie, Taturu, Barabaig and Maasai] included in particular: negotiation and signing of a Free Prior and Informed Consent (FPIC) Agreement between EACOP and the Akie Community of Napilikunya in July 2022 – the first of its kind in Tanzania'. The Company has provided comments regarding this indicator on FPIC with the Akie Community and the Wataturu community. However, both cases seem to be related to its extractive sector. This indicator looks for evidence related to renewable energy activities. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [EACOP FPIC_web, 21/03/2023: eacop.com]
D.2.PD	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: The 2022 Registration Document indicates: 'As an illustration [of forging ties with its local public and private stakeholders and fostering dialogue focused on the regions], during 2022, in each region, think tanks were set up to engage with stakeholders on regional issues related to the energy transition [...]: the 34 meetings held brought together nearly 300 participants. Several partnerships have been established with metropolitan areas such as Toulouse and Nice Côte d'Azur to support these regions in their energy transition and economic development. TotalEnergies has also entered into a partnership with the FNSEA (umbrella organization representing local agricultural unions and regional federations) to move forward together for the decarbonization of the agricultural world'. The Company explains actions taken in Mozambique in the aftermath of the insurrections and the armed conflict in March 2021: 'Following the insurrections and the armed conflict in March 2021, the Mozambique LNG gas project in the province of Cabo Delgado has been suspended since April 2021, further to our declaration of force majeure. As soon as conditions of safety permitted, we resumed our actions with local communities and ensure that their human rights affected by this humanitarian crisis are respected. 1,200 refugee families (4,750 people) returned to their villages of origin in September and October 2022, and we contributed to this return in support of the Government of Mozambique by providing logistical and material aid for their resettlement under better conditions. We have launched various socio-economic projects for local communities in support of local NGOs. Training in human rights and the Voluntary Principles on Security and Human Rights (VPSHR) in particular were also provided to employees and external stakeholders in March and October 2022. We continued to engage with our stakeholders, including communities, NGOs, organizations from civil society, the Government, and in particular the National Commission on Human

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Rights, which is a key partner'. However, it is not clear the process by which it has identified and engaged with affected stakeholders on Human Rights matters. The subindicator understands engagement as an ongoing process of interaction and dialogue between the Company and its affected stakeholders that enables it to hear, understand and respond to their interests and concerns, including through collaborative approaches. Moreover, this indicator looks for evidence related to renewable energy activities. [2021 Universal Registration Document, 2022: totalenergies.com] & [2022 Universal Registration Document, 03/2023: totalenergies.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with communities: The 2022 Universal Registration Document, details the Tilenga project, in Uganda and Tanzania, and indicates: 'In 2022, EACOP has consulted closely with four vulnerable ethnic groups self-identifying as "Indigenous Peoples" impacted by the project – the Akie, Taturu, Barabaig and Maasai. EACOP's approach with these groups included in particular: negotiation and signing of a Free Prior and Informed Consent (FPIC) Agreement between EACOP and the Akie Community of Napilikunya in July 2022 [...]; negotiation and signing by the traditional leaders of The EACOP Plan for Vulnerable Ethnic Groups Self-Identifying as Indigenous Peoples in September 2022'. However, no further details of the actual engagement found. Moreover, the Company is expected to provide at least two examples of engagements in the context of human/labor rights [the information above mentioned is related to the same project and it is considered as part of the same process]. The Company has provided comments regarding this indicator on its Refining & Chemicals segment and on its Exploration & Production subsidiary, however, this indicator looks for evidence related to renewable energy activities. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Examples of engagement refer to marginalised groups and provide additional detail: Regarding the Company's stakeholder engagement in Tanzania and Uganda, the 2022 Universal Registration Document indicates: 'A variety of methods and tools are used: village meetings, small group meetings, focus group discussions, one to one meetings, site visits and tours, alternative medium such as community drives etc. Engagement is supported by disclosure materials adapted to the audience including a range of written and visual material, traditional media including community radio, telecommunications and websites. As an example, as part of the Tilenga Project, an innovative series of webinars known as "Let's Talk!" provides a deep dive into topics of interest for civil society. In 2022 subjects covered included the Tilenga biodiversity programme, road safety, gender, voluntary principles on security and human rights, and climate'. It adds: 'In 2022, EACOP has consulted closely with four vulnerable ethnic groups self-identifying as "Indigenous Peoples" impacted by the project – the Akie, Taturu, Barabaig and Maasai'. It states it has achieved FPIC: 'negotiation and signing of a Free Prior and Informed Consent (FPIC) Agreement between EACOP and the Akie Community of Napilikunya in July 2022 – the first of its kind in Tanzania'. However, no description found of how affected communities were identified. The Company has provided comments regarding this indicator on its Tilenga Project [which comprises oil production, a crude oil processing plant, underground pipelines and infrastructure], however, this indicator looks for evidence related to renewable energy activities. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [2023 Sustainability & Climate Progress Report, 2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The Company has provided feedback for this subindicator, however, the documents is considered outdated according to the three-reporting-year timeframe policy. • Not Met: Describes how stakeholders views influenced company's HRs approach: The Company has provided feedback for this subindicator, however, the documents is considered outdated according to the three-reporting-year timeframe policy.

D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to identify benefit and ownership sharing: The 2022 Universal Registration Document notes: 'TotalEnergies strives to be an agent of positive change for society, and to contribute to its development through its societal actions. [...] TotalEnergies intends to contribute to the development of economic opportunities for its host regions and communities. At a local level, the Company's activities can be a source of opportunities for the people, but may also have an impact on the living conditions of local communities and residents. Furthermore, in order to address society's global challenges, the Company is committed to the public interest'. It adds: 'First and foremost, the local projects address the issues of development and solidarity identified thanks to consultations with local communities, and favor cooperation and skills development'. It further explains projects it has in different regions. However, no commitment to identify potential benefit and ownership sharing options that serve affected communities including a commitment to explore co-ownership models found. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Commitment includes right to decide own priorities for communities: The Human Rights Guide indicates: 'The Group seeks to establish dialogue with affected communities at a very early stage, and maintain constructive relationships with them and other stakeholders. Regular and meaningful consultation, transparency regarding operational activities, listening to stakeholder concerns, needs and perceptions, consulting communities about impacts and mitigation measures are all critical to establishing and maintaining constructive relationships with stakeholders throughout the life cycle of our operations'. However, no commitment found that recognises that affected communities have a right to decide their own priorities in terms of how they may benefit from projects. The Company has provided comments regarding this indicator on its Mozambique LNG Project and the Area 4 Rovuma LNG Project key resettlement commitments, however, this indicator looks for evidence related to renewable energy activities and these are liquefied natural gas projects. [Human Rights Internal Guide, 2015: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing: The 2022 Sustainability & Climate Progress Report states: 'When we develop new projects anywhere in the world, whether in Uganda and Tanzania or in Europe, we initiate a dialogue with community leaders, conduct analyses of local needs and concerns and provide social and economic support to the affected local communities [...]. We identify, anticipate and remedy any negative impacts of our operations on local communities affected by land acquisitions or living near our sites. We implement systems to record complaints and maintain a steady dialogue with our stakeholders, with support from experts to evaluate our local actions. We keep local communities informed about the array of reports and impact assessments we produce. For the Tilenga and EACOP projects, for example, our environmental and social impact assessments (ESIAs) and the findings from human rights experts have been published online'. The 2021 Universal Registration Document notes: 'In accordance with its guiding principle of transparency in engaging with civil society, since March 2021 TotalEnergies publishes studies, independent third-party reviews and social and environmental action plans related to both the Tilenga and EACOP projects'. However, this subindicator looks for a disclosure of statistics for each of its projects and/or operations describing the demographics of its benefits and ownership sharing processes, including any final agreements, percentage of revenue of projects and/or equity shares paid to local communities. No further evidence found. Moreover, this indicator looks for evidence related to renewable energy activities. [2022 Sustainability and Climate Progress Report, 03/2022: totalenergies.com] & [2021 Universal Registration Document, 2022: totalenergies.com] • Not Met: Disclosure how affected communities participated in decision-making: The webpage indicates: 'On the ground, all over the world, we work hand in hand with local NGOs. These mostly excellent relationships, [...] are crucial in taking a responsible approach in our operations and enable us to find out and respond to priority needs. [...] The Company operates through the TotalEnergies Foundation general interest program in its countries of operation. Its objective is to give the most vulnerable young people the means to take their destiny in their hands, promoting equal opportunities and contributing to their autonomy'. The 2022 Universal Registration Document notes: 'The Company maintains a comprehensive, integrated policy, rooted in dialogue with communities and public and private stakeholders, for supporting local growth and in-country value. It forges synergies among the various sources of value generation for host countries (employment,
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Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>subcontracting, infrastructure, support for local industry, socioeconomic development projects, education, energy access, etc.) by capitalizing on the Company's industrial expertise'. It explains its stakeholders involvement: 'TotalEnergies promotes dialogue with local stakeholders to develop constructive and transparent relationships with them. To this end, TotalEnergies' One MAESTRO framework requires subsidiaries to engage in a structured, regular dialogue with their stakeholders to inform them, listen to them and take their concerns and expectations into account. [...] It encourages the use of experts in order to identify and understand these peoples' expectations and specificities, to consult them and to contribute to their socio-economic development. [...] Local structures for dialogue have been set up, such as Community Advisory Panels in the United States and specific local committees for certain European platforms (e.g. Feyzin neighbors' conference, La Mède neighbors' meetings and Donges residential committee)'. However, it is not clear how members of affected communities participated in the decision-making process in relation to owner sharing processes, and revenue of projects or equity shares paid to local communities. [Value creation for host regions_web, N/A: totalenergies.com] & [2022 Universal Registration Document, 03/2023: totalenergies.com]</p>
D.4.PD	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Actions taken to support access and affordability of renewable energy in the value chain: The 2022 Sustainability and Climate Progress Report indicates: 'Willing to expand the Company's low carbon offering, TotalEnergies Offgrid Solar Solutions teams develop and market solar solutions across over 30 countries. [...] In 2022, TotalEnergies sold approximately 700,000 solar lamps and solar kits through distributors and its network of service stations. The Company has also become a major supplier of solar solutions to the humanitarian sector. In addition, the teams at TotalEnergies Off-grid Solar Solutions work with partners in Africa to minimize the environmental impact of products through repair and recyclability projects and installed collection and recycling points for batteries'. Also, 'TotalEnergies has embraced the need to offer its customers affordable less carbon-intensive energy products, and to lend support to our partners and suppliers with their own low-carbon strategies. [...] in 2022 TotalEnergies published an outline of how our businesses might evolve as we become a carbon-neutral energy company by 2050, together with society'. The 2023 Sustainability & Climate Progress Report states: 'The energy transition relies in part on using more electricity. We devoted 25% of our investments to this in 2022. In emerging markets, particularly in Africa, making the move from traditional biomass towards modern forms of energy – while keeping them affordable – is essential to increase energy efficiency, raise living standards and support the economic development of growing populations. One third of the world's population, or 2.5 billion people, currently have no modern and reliable means to cook'. It adds: 'Around the world, 760 million people, [...], do not have access to electricity for lighting, preserving food or keeping cool when temperatures rise. With more than 5 million solar lamps and kits sold, including 700,000 in 2022, we are providing lighting solutions in 40 countries, mostly in Africa and Asia. To offer a better response to the needs of local populations, we have expanded the product range, reviewed our product design for improved reparability, and set up battery collection and recycling points'. Finally, 'In 2022, TotalEnergies supported around 300,000 energy efficiency projects at residential properties, half of which benefited people on very low incomes, and encouraged around 360,000 new drivers to sign up to car pooling programs. As a result of its incentives and initiatives, TotalEnergies achieved energy savings of around 150 TWhp in 2022, equal to the domestic energy use of 1.5 million French people for 15 years'. However, actions have to include value chain. It provides additional evidence involving the Tilenga-EACOP hydrocarbon development project, however, this indicator looks for evidence related to renewable energy activities. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [2023 Sustainability & Climate Progress Report, 2023: totalenergies.com] • Not Met: Including a timebound actions plan and reporting targets: The 2022 Sustainability & Climate Progress Report states: 'In September 2021, TotalEnergies responded to the UN Energy initiative by establishing an Energy Compact in which we announce the concrete measures we are going to implement to promote access to clean and affordable energy for all by 2030 (SDG7). We estimate that, of the 100 GW of renewable electricity we will install by 2030, some 33 GW will be located in emerging or developing countries, providing sustainable energy to around 40 million people, some of whom will never have had decent access to energy'. However, it is not clear these on targets developed in consultation with communities including marginalised groups at heightened risk of energy poverty.

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			<p>The Company is also expected to report on these targets. [2022 Sustainability and Climate Progress Report, 03/2022: totalenergies.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Public support for government policies addressing energy access: The webpage section Advocacy indicates: ‘Regarding the fight against climate change, TotalEnergies promotes the following principles that guide the effort and the strategy of the Company: [...] TotalEnergies supports policies, initiatives and technologies aimed at promoting the development of renewable energies and sustainable bio energies (biofuels, biogas) as well as energies and technologies aimed at decarbonizing industrial processes and transport, such as hydrogen, carbon capture or the electric vehicle’. The Human Rights Guide indicates: ‘The Group’s societal policy and processes regulate our interactions with local communities and other external stakeholders, and focus on four main axes: stakeholder engagement, prevention and mitigation of negative impacts, shared value creation, and access to energy’. However, no evidence found that it publicly supports government policies and actions to address energy access challenges (including but not limited to affordability of electricity, grid electrification, mini grids, etc). [Advocacy_web, N/A: totalenergies.com]

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect land ownership/natural resources as in VGGT. Discloses how identifies legitimate tenure holders.: The 2022 Progress Report on Sustainability and Climate indicates how the Company has identified legitimate tenure rights holders ion the Tilenga-EACOP project: 'The Tilenga-EACOP project is being developed in a sensitive social environment and requires the implementation of land acquisition programs focused strongly on respecting the rights of the concerned communities. From the very start, special emphasis was placed on informing, consulting and concerting with involved stakeholders. Nearly 70,000 people were consulted for the environmental and social impact studies and more than 20,000 meetings have been held to date with the concerned populations and civil society organizations. In accordance with International Finance Corporation (IFC) standards, a land acquisition program was developed and approved by the authorities in 2016. The program includes a full inventory of the impacted lands and crops and compensation in cash and/or in kind. In particular, each household whose primary residence is relocated may choose between a new residence or monetary compensation. In addition, programs to restore standards of living have been deployed and will continue for at least three years after the property is sold to the project. During this period, ongoing socio-economic tracking of project-affected persons will be carried out to ensure that their medium-term standard of living is not impacted. [...] The land acquisition and relocation program for Tilenga in Uganda has continued, integrating improvement pathways identified in independent studies conducted during the first phase of the project's development (2018-2019)'. The Human Rights Guide provides examples of Human Rights and Principles: 'The Group applies international best practice in its land access and acquisition process in order to avoid or minimize Human Rights impacts. This includes avoiding any physical displacement whenever possible, establishing clear and transparent procedures in consultation with affected people, proposing replacement land of equal quality whenever possible, providing support for livelihood restoration, ensuring people are compensated appropriately and by paying specific attention to vulnerable people and households'. The 2020 Universal Registration Document notes: 'Uganda and Tanzania signed an intergovernmental agreement on the EACOP project in 2017 in which they pledged to cooperate in facilitating the implementation of the project. Further to that intergovernmental agreement, in 2020 EACOP finalized an agreement with each of the two host countries (a Host Government Agreement, or HGA) defining how the project would be carried out in each country. Those agreements address issues such as land property rights, applicable laws and regulations, the local content of investments, protection against the risk of expropriation and EACOP's tax treatment'. Regarding property rights and access to land, the Human Rights Guide notes: 'Property rights are covered by Article 17 of the Universal Declaration of Human Rights, to which the Group's Code of Conduct refers: 1. "Everyone has the right to own property alone as well as in association with others. 2. No one shall be arbitrarily deprived of his property.»'. The Company provided further feedback regarding this indicator, however, key evidence, from the 2022 Sustainability & Climate Progress Report was already in use. It has also provided information on its Tilenga and EACOP projects [oil sector]. However, no evidence found of a policy commitment to respect land rights of legitimate tenure rights holders as set out in the UN Voluntary Guidelines on the Responsible Governance of Tenure of Land, including renewable projects. [2022 Progress Report, 03/2022: totalenergies.com] & [Human Rights Internal Guide, 2015: total.com] • Not Met: Disclosure of locations of projects including numbers in urban, rural, natural areas <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Extends expectation to business relationships

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose: The Tilenga HRIA indicates: ‘The Group applies international best practice in its land access and acquisition process in order to avoid or minimize Human Rights impacts. This includes avoiding any physical displacement whenever possible, establishing clear and transparent procedures in consultation with affected people, proposing replacement land of equal quality whenever possible, providing support for livelihood restoration, ensuring people are compensated appropriately and by paying specific attention to vulnerable people and households. [...] Regarding land ownership disputes, the Project has, throughout the RAP process, defined these as “any contestation, whether formal or informal including a complaint lodged with the Project in the course of the planning or implementation but before compensation, pertaining to ownership of a Project affected asset including land.” When a land ownership dispute arises, the Project refers the parties in conflict to state-based or traditional leaders for dispute resolution. The Project does not take any role in the resolution of the disputes on land ownership to avoid becoming an arbitrator of asset ownership. Although this approach has been successful for individual cases of disputed ownership, the stakeholder feedback suggests that larger conflicts are emerging over collective versus private rights, which could be potentially addressed through a regional land-use planning process’. However, it is not clear the Company’s renewable projects follow the same procedure, as the process described above seems to focus on the Tilenga Project, in the oil sector. Moreover, the steps taken to use its leverage to work towards a resolution have to be in line with international standards. [Tilenga HRIA, 01/2022: totalenergies.com]

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: The Tilenga HRIA indicates: 'The land acquisition and resettlement process is continuously monitored by way of regular reporting to the Project from its resettlement consultant as well as internal and external audits conducted in the field in order to assess alignment with the LARF and IFC PS5. For example, the resettlement processes and outcomes for RAP1 were evaluated by an external expert and the report was published on the Project's website'. The document Tilenga and EACOP, two TotalEnergies' projects notes: 'Until compensation is paid, the land is still owned by the PAPs [project affected person], who are encouraged to continue to use their land as normal, farming, planting and harvesting seasonal crops, and maintaining houses and other structures. The PAPs were informed, however, that after the cut-off date for asset valuation, any new development on their land would not be eligible for compensation. The application of an inventory cut-off date is set out in IFC Principle 5'. However, no evidence found of a public commitment to uphold this IFC PS, current evidence refers to an example of impact assessment. [Tilenga HRIA, 01/2022: totalenergies.com] & [Tilenga and EACOP, two TotalEnergies' projects, 03/2023: totalenergies.com] • Not Met: Commitment not to relocate without FPIC and to providing compensation: The Human Rights guide states that 'Indigenous people's specific rights are recognised in particular by the ILO Convention No. 169 adopted in 1989, the United Nations 2007 Declaration on the Rights of Indigenous Peoples, and various World Bank standards, including the International Finance Corporation's "Performance Standards". In accordance with these documents, indigenous peoples have the right to Free, Prior and Informed Consent (FPIC) for developments affecting them. [...] FPIC is more than just a process of consultation. It is a negotiated process involving all interested parties, the aim of which is to allow indigenous peoples to be involved in decision making about future developments affecting them and ultimately, to give or withhold their consent'. The Tilenga HRIA indicates: 'Property Rights, Access to Land, and Cultural Heritage Property rights are covered by Article 17 of the Universal Declaration of Human Rights, to which the Group's Code of Conduct refers: 1. "Everyone has the right to own property alone as well as in association with others. 2. No one shall be arbitrarily deprived of his property."'. [...] The Group applies international best practice in its land access and acquisition process in order to avoid or minimize Human Rights impacts. This includes avoiding any physical displacement whenever possible, establishing clear and transparent procedures in consultation with affected people, proposing replacement land of equal quality whenever possible, providing support for livelihood restoration, ensuring people are compensated appropriately and by paying specific attention to vulnerable people and households'. However, no publicly available commitment to not to relocate or displace affected communities without obtaining free, prior, and informed consent (FPIC) and providing just and fair compensation, as agreed during the FPIC and resettlement process with relevant stakeholders. No further evidence found in the Code of Conduct. [Human Rights Internal Guide, 2015: total.com] & [Tilenga HRIA, 01/2022: totalenergies.com]

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects): Regarding processes of land acquisition, the 2022 Registration Document indicates: 'For RAP [Resettlement Action Plan] 1, 30 replacement houses have been delivered. For RAP 2-5, 55 out of 205 replacement houses had been handed over by December 2022, as part of the progressive deployment of the program. Until the replacement houses are delivered, the affected PAPs may continue to live in their original house'. However, it is not clear it involves all current and planned projects it is involved in, and whether these include renewable energy projects (since this benchmark is focused on the renewable businesses of companies). It adds: 'When the decision is taken to develop an industrial project, a detailed baseline study is conducted to identify in advance the stakeholders potentially affected, describe the local context and assess the main socio-economic and cultural stakes (risks and opportunities) in the affected area. A societal impact assessment is then conducted to assess and analyze the opportunities and the direct, indirect or cumulative risks of the project in the short, medium and long term. In 2022, 129 of these studies were initiated or carried out. In addition to these impact assessments, specific human rights impact assessments may also be conducted in high-risk areas or conflict zones with the support of independent experts'. It further explains: 'PAP (Project Affected Person) corresponds to a group of individuals forming a household or an entity (institution, company) which has been identified, within the framework of the studies carried out for the program of acquisition of the land necessary for the execution of the project., as having at least one asset impacted by the implementation of the project. An asset can be a dwelling, a construction, a plot of bare or cultivated land, plants, trees, crops'. However, no statistics found published regarding the number of people relocated by current and planned renewable energy projects it is involved in. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Publishes regular reviews of living conditions after relocation: Regarding transparency, the 2022 Universal Registration Document notes: 'In accordance with its guiding principle of transparency in engaging with civil society, since March 2021 TotalEnergies publishes relevant studies, independent third-party reviews and social and environmental action plans related to both the Tilenga and EACOP projects. Such independent reviews help ensure that the projects are carried out in compliance with good international industry practices. Alongside the ongoing dialogue with the local communities, these reviews also allow potential improvements to be identified'. It provides further information on the Tilenga project and it also makes reference to the news and data available on our Ugandan, Tanzanian affiliates' websites. However, no evidence found that the Company publishes regular (at least annually, throughout the life of the project) reviews of living conditions of relocated communities in scenarios where housing or other related compensation agreements were made, including its renewable energy projects. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [Tilenga HRIA, 01/2022: totalenergies.com] • Not Met: Description of approach to physical and economic displacement

F. Security and conflict-affected areas (incl. responsible mineral sourcing)

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: The 2022 Universal Registration Document notes: 'Standalone human rights impact assessments may also be conducted in addition to the environmental and societal impact assessments in high-risk areas or conflict zones with the support of independent experts. For example, regarding the Tilenga and EACOP projects, in order to address the potential impact of the projects on human rights, TotalEnergies launched in 2016 a human rights risk and impact assessment through societal and environmental studies. Those studies were approved by the authorities in 2019 for Tilenga and the Tanzanian part of EACOP, and in 2021 for its Ugandan part. Based on the recommendations of these reports, TotalEnergies decided to carry out specific human rights impact assessments in parallel with the approval process for societal and environmental impact assessments'. The Human Rights Guide indicates: 'To analyse and improve the impacts of our projects on local communities and external stakeholders, the Group may engage CDA, an independent US non-profit organisation, expert in community relations and company community conflict. CDA has a programme that helps extractive companies identify and manage the impacts of their activities in complex regions or conflict zones. CDA is working with many major oil and gas and mining companies as well as with the United Nations and civil society representatives. The Group supports this programme, which is of great value for our own deliberations. For example CDA case studies have been carried out on the Group's Business units in Myanmar, Nigeria, Bolivia, Uganda and Argentina. The final reports are posted and available on CDA's website'. However, evidence seems to focus in extractive-sector projects. The commitment should cover its renewable projects. The Company has provided feedback for this subindicator, however, the documents is considered outdated according to the three-reporting-year timeframe policy. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The 2022 Universal Registration Document indicates: 'Standalone human rights impact assessments may also be conducted in addition to the environmental and societal impact assessments in high-risk areas or conflict zones with the support of independent experts'. The webpage section Vigilant Plan indicates: '[the work done] enabled TotalEnergies to identify and analyze the human rights risks that affect the Activities and to prioritize them according to their salience. [...] In 2019, TotalEnergies updated its procedures to analyze risks of impacts on human rights (taking into account the country, types of activity and types of raw materials or purchased products and services). This work was done with a specialized consultant, and included workshops with internal and external stakeholders. It took into account international country risk indicators established by a specialized third party. This process notably offers a support to Subsidiaries located in geographic areas at higher risk of impacts on human rights'. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [Vigilance plan_web, N/A: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How stakeholders are involved in the process to mitigate risks: The Human Rights Guide indicates: 'Coordination between the Group's security teams and those in charge of community relationships within societal teams is essential so that concerns and questions from communities are addressed before they can become security issues. Identifying early and appropriate responses to community concerns will ensure better relations with communities, help reduce tensions, and mitigate the risk of Human Rights abuses [...]. As stated in the Voluntary Principles, risk analysis and planning for security arrangements and rules of engagement should be done in consultation with local communities'. In future assessments, the company will also have to demonstrate how this conflict sensitive lens is applied to situations outside of security providers. [Human Rights Internal Guide, 2015: total.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.2.PD	Evidence of security provider human rights assessments	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Regularly conducts risk assessment regarding security forces: Regarding the Company's procedure to conduct Security and Human Rights risk-assessments and VPSHR auto-diagnostic evaluations, the 2022 VPSHR Annual Report indicates: 'Since 2016, the Company has been using Auto-Diagnostic and Risk-Assessment (ADRA) tools [...] which help TotalEnergies' affiliates to evaluate their own conformity to the VPSHR, assess the VPSHR-related risks present in their operating environment, and formulate an action plan with recommendations to mitigate the identified risks. Auto-Diagnostic tool takes the form of a questionnaire which, once completed, gives the entity's VPSHR compliance rate on a scale from 0% to 100%, identification of an action plan to increase the level of compliance. The Auto Diagnostic must be updated once a year and following any incident or significant change at the entity level. The Risk-Assessment tool must be completed at least every two years and once completed, generates a risk matrix and an action plan for implementation. [...] The actual tool contains 25 risk indices covering Governance, Conflict Situation, Security Actors as well as Environment, and socio-economy topics'. The results of these two tools are reported in the Annual Report. [2022 VPSHR Annual Report, 04/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to Voluntary Principles on Security and HRs: The Code of Conduct indicates: 'Total Energies complies with [...] The Voluntary Principles on Security and Human Rights'. [Code of Conduct, 2021: totalenergies.com] Not Met: If applicable, discloses use of private security providers and uses only ICoCA members. <p>If direct employment of security, commitment to follow ICoCA itself.</p>
F.3.PD	Responsible sourcing of minerals: Arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Statement on OECD Guidance aligned due diligence: The 2021 Form SD indicates: 'SunPower [a Company's subsidiary] utilized [...] Steps 1 and 2 of the OECD Guidance'. However, it is not clear that it applied for all the Company's renewable activities linked to wind and solar, as SunPower is a US subsidiary. The 2022 Universal Registration Document notes: 'TotalEnergies' Vigilance Plan is based primarily on the Code of Conduct which defines the Company's values, including safety and respect for others, and their application to human rights, the environment, and people's health and safety. The Code particularly sets forth TotalEnergies' compliance with the following international standards: [...] the OECD Guidelines for Multinational Enterprises [...]'. However, the Company is expected to undertake due diligence in accordance with the full OECD Guidance for responsibly supply chains of minerals from conflict affected and high-risk areas. No further evidence found. [2021 Form SD, 31/05/2022: totalenergies.com] & [2022 Universal Registration Document, 03/2023: totalenergies.com] Not Met: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers: The Fundamental Principles of Purchasing indicates: 'Suppliers are required to comply with and to ensure their own suppliers and subcontractors comply with applicable laws, as well as principles equivalent to those set forth in the [...] the OECD Guidelines for Multinational Enterprises'. The 2021 Universal Registration Document indicates: 'The Fundamental Principles of Purchasing (FPP) set out the commitments expected from suppliers in various domains, including human rights in the workplace and safety. A Company directive reaffirms the obligation to annex the FPP or to transpose them in the selection process as well as in the contracts concluded with suppliers of goods or services'. However, it is not clear it incorporates into commercial contracts/ written agreements with suppliers requirements to also conduct due diligence in accordance with the OECD Guidance (for responsible Supply Chains of Minerals from Conflict-affected and high risk areas). [Fundamental Principles of Purchasing, N/A: totalenergies.com] & [2021 Universal Registration Document, 2022: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on risk assessment and improving DD: The 2022 Universal Registration Document notes: 'Work to improve the transparency of the Company's supply chain, including traceability audits on the supply chain, was initiated in 2021, and continued in 2022 with studies on human and environmental rights in the supply of minerals, ore and raw materials. With regard to photovoltaic panels, TotalEnergies has joined a pool of American developers who jointly order and share traceability audits. At the end of 2022, six Suppliers with which the Company works had been audited via these traceability audits'. However, it is not clear how it proactively works with suppliers to contribute to building their capacity in risk assessment and improving their due diligence performance. [2022 Universal Registration Document, 03/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Disclosure of supply chain mapping: The 2021 Form SD indicates: 'SunPower [a Company's subsidiary] utilized [...] Steps 1 and 2 of the OECD Guidance'. However, it is not clear that it applied for the rest of the Company's renewable businesses, as SunPower is a US subsidiary. The Company is expected to disclose the names and addresses of first-tier suppliers, the names and locations of its below-first tier suppliers (this does not include raw material suppliers); the sourcing countries of at least three raw materials at high risk of adverse human rights impacts. [2021 Form SD, 31/05/2022: totalenergies.com] & [TotalEnergies to Acquire SunPower's _web, 2/10/2022: totalenergies.com]
F.4.PD	Responsible sourcing of minerals: Risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes risk identification and disclosure in line with OECD Guidance: The 2022 Universal Registration Document notes: 'The origin, extraction and refining conditions and the use of certain minerals, ores and raw materials are the subject of particular attention, given the potential risks to human rights and the environment. In 2022, TotalEnergies conducted an internal study to identify the Company's priorities in this area. This study, based on a materiality analysis and a risk analysis, identified three priorities: cobalt, polysilicon and conflict minerals (gold, tungsten, tin, tantalum)'. However, no further description found of the process and it is not clear it is as set out in the OECD Guidance. Moreover, it is expected to disclose the risks identified. [2022 Universal Registration Document, 03/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expectation of suppliers to disclose supply chain mapping • Not Met: Risk identification process covers all minerals: See above. However, it is not clear the Company has a risk identification processes and disclosures which cover all minerals. [2022 Universal Registration Document, 03/2023: totalenergies.com]
F.5.PD	Responsible sourcing of minerals: Risk management in the mineral supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Suppliers using minerals in equipment provided to describe steps taken to respond to risks in supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Those suppliers to describe monitoring of risk prevention/mitigation measures: The 2021 Form SD indicates: 'Under SunPower's risk management framework, to the extent that risks require mitigation, SunPower monitors and tracks the performance of the risk mitigation efforts and reports these efforts to appropriate senior oversight personnel'. However, SunPower is a US Company's segment, it is not clear other renewable segments of the Company have a process to monitor and track performance of risk prevention and mitigation measures. According to the 2022 Sustainability & Climate Progress Report the Company has identified three priorities: cobalt, polysilicon and conflict minerals (gold, tungsten, tin, tantalum). It expands on its approach to each of them: 'Cobalt: [...] Saft Groupe has been conducting an annual campaign since 2021 to collect information from its suppliers. Saft Groupe relies on the Extended Minerals Reporting Template (EMRT) [...] to identify the processing units in its supply chain and the country of origin of the cobalt ores. As part of a progress-led approach, Saft Groupe is also a member of the Global Battery Alliance (GBA) [...]. Polysilicon: Polysilicon is used in the manufacture of solar panels. TotalEnergies Global Procurement carries out traceability audits upstream of the supplier's selection or orders these audits from an independent third party. TotalEnergies has joined a pool of US developers who jointly commission and share traceability audits. [...] Conflict minerals: The qualification process identifies suppliers using "conflict minerals" for the Company's purchases. Thus, pursuant to Rule 13p-1 of the U.S. Securities Exchange Act of 1934, as amended, [...] since 2014, TotalEnergies has filed with the United States Securities and Exchange Commission (SEC) an annual document relating to "conflict minerals" sourced from the Democratic Republic of the Congo or neighboring countries. [...] As conflict minerals may potentially be present in the electrical and electronic components used in battery manufacturing, Saft Groupe conducts an annual campaign to collect information from its suppliers. Saft Groupe relies on the Conflict Minerals Reporting Template (CMRT) [...] to determine the presence of conflict minerals in its supply chain and to identify the processing units for these minerals that are likely to participate in it and the country of origin of the ores'. However, no description of the processes to monitor/track performance of risk management measures (addressing already identified risks). [2021 Form SD, 31/05/2022: totalenergies.com] & [2022 Sustainability and Climate Progress Report, 03/2022: totalenergies.com] • Not Met: Those suppliers to disclose significant improvement over time: See above. However, no evidence found of significant improvement in risk prevention/mitigation over time. [2022 Sustainability and Climate Progress Report, 03/2022: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How suppliers and affected stakeholders engaged on strategy: See above. However, no description found of how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [2022 Sustainability and Climate Progress Report, 03/2022: totalenergies.com] • Not Met: Processes cover all minerals: See above. No evidence found that the Company has a risk management and response processes that cover all minerals. [2022 Sustainability and Climate Progress Report, 03/2022: totalenergies.com]

G. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: The Company has referred to the TEPU [TotalEnergies Exploration & Production Uganda] Statement on Human Rights Defenders, the Tilenga HRIA and the EACOP [East African Crude Oil Pipeline Ltd] human rights policy. However, these documents are related to extractive activities, and this indicator looks for a commitment to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders that include its renewable energy activities. [Tilenga HRIA, 01/2022: totalenergies.com] & [Statement on Human Rights Defenders - Uganda - TEPU, N/A: corporate.totalenergies.com] • Not Met: Expectation on business partners in value chain to make this commitment

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Description of how working with HRDs to create safe and enabling environment: The 2022 Sustainability and Climate Progress Report indicates: 'TotalEnergies EP Uganda regularly takes opportunities to discuss and promote the rights of Human Rights Defenders during its dialogue with Government, petroleum authorities and the police. In its contacts with all levels of the authorities, it freely discusses with them the importance of freedom of expression and the essential role that NGOs and Human Rights Defenders play in upholding rights and ensuring constructive dialogue and an open civic space. On 3 May 2022, which is celebrated as World Press Freedom Day, TotalEnergies EP Uganda Senior Management representatives attended an event with the Uganda Journalism Association (UJA) to raise awareness of the importance of the human right to freedom of expression. At the end of 2022, TotalEnergies EP Uganda's General Manager reiterated, in a video statement published on the Affiliate's website, TotalEnergies EP Uganda's strongest opposition to threats or attacks against those who peacefully exercise their right to freedom of expression, peacefully protest or assemble. TotalEnergies EP Uganda seeks to promote dialogue and exchanges with Human Rights Defenders in the framework of its activities and seeks to exercise its influence with relevant persons or authorities where, in the framework of its activities, it is alerted of allegations of threats, intimidation, harassment or violence against stakeholders. The General Manager also reiterated the various means which can be used for making complaints or raising alerts in relation to the Project which include an office, a toll-free number, Community Liaison Officers, an email service and contact through traditional leaders and district authorities'. The Company provides further information on the Tilenga Project [to extractive sector]. However, no description found of how it works specifically with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels beyond the context of Uganda, which in addition is specifically related to extractive activities. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [2021 Universal Registration Document, 2022: totalenergies.com]

H. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses quantitative H&S information (injury rates or lost days, and fatalities): The 2022 Universal Registration Document discloses the lost time injury rate for the Company's employees for 2022: 0.39 and the number of occupational fatalities for the same reporting period: 0. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Expectation extends to relevant business relationships: The 2022 Universal Registration Document discloses the lost time injury rate for contractors' employees 2022: 0.51 and the number of occupational fatalities for the same reporting period: 3. No further evidence found regarding similar requirements beyond contractors. [2022 Universal Registration Document, 03/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Sets targets for H&S performance (including injury rates or lost days and fatalities): The 2022 Universal Registration Document indicates: 'In addition to its aim of zero fatalities in the exercise of its activities, TotalEnergies has set itself the target of continuously reducing the TRIR [Total recordable incident rate] indicator and, for 2023, of reducing it below 0.65 for all personnel of the Company and its contractors'. [2022 Universal Registration Document, 03/2023: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Met targets or explains why not or how improve H&S management systems: The 2022 Universal Registration Document indicates: 'In addition to its aim of zero fatalities in the exercise of its activities, TotalEnergies has set itself the target of continuously reducing the TRIR [Total recordable incident rate] indicator and, for 2023, of reducing it below 0.65 for all personnel of the Company and its contractors'. As for the fatality target, it explains some of its actions to tackle the problem: 'the Company has applied 12 Golden Rules for safety at work since 2010. These simple Golden Rules, which can be memorized by everyone and are representative of a high number of accidents in the workplace, must be strictly obeyed by all personnel, both employees and external companies, in all countries and in all the Company's activities. The purpose of the Golden Rules is to protect day-to-day safety in operations and on sites with a common objective: "Zero fatal accidents". In 2022, TotalEnergies reviewed the drafting to its Golden Rules for them to be more directly understandable by players on site and to facilitate their appropriation. These Golden Rules were widely distributed on World Day of Safety, to both employees and external companies. In order to consolidate these new Golden Rules and allow them to be discussed and taken onboard by the teams, a new Golden Rule was highlighted each month, and deployment materials, based on the accidents in the Company, were distributed to the subsidiaries. In addition, the existing Stop Card system enables any employee of the Company or a contractor to intervene if, for example, any of the Golden Rules are not being obeyed. In 2019, the Company also rolled out the Our lives first: zero fatal accidents program, which introduced joint safety tours with external companies[...], the establishment, in the work permit process, of a ritual prior to work on all the operated sites concerned [...] and a tool to intensify checks in the field and measure compliance with safety rules for the five high-risk activities: work at height, lifting operations, work on energy-powered systems, work in confined spaces, hot work (more than 150,000 compliance measures were carried out in this context in 2022 on Company's sites)'. [2022 Universal Registration Document, 03/2023: totalenergies.com]
H.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The Company indicates the duties of its Strategy & CSR Committee [Board Committee], among which is: 'examining the Company's corporate social and environmental responsibility (CSR) issues and, in particular, matters relating to the incorporation of the Climate challenge in the Company's strategy'. However, it is not clear it is tasked with oversight of its supply chain policies that address forced labour. Moreover, this subindicator looks for a description of how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Suppliers to have these arrangements in place: Regarding the prohibition and prevention of forced labour, the Fundamental Principles of Purchasing indicates: 'Ensure that no worker is coerced to work against her/his will through the use of violence, intimidation, financial coercion or threat of penalty or sanction. Prohibit confiscation of workers' identity documents, provided that where local law requires such document to be retained, workers must have immediate and automatic access to such documents'. The Company has a document name Practical Guide to Suppliers: "Prohibition and prevention of forced labour", where it expands on its provisions. However, it is not clear it expects suppliers to have tasked a Board member or Board Committee with oversight of its supply chain policies that address forced labour, and to describe how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions. [Fundamental Principles of Purchasing, N/A: totalenergies.com] & [Practical Guide for Suppliers - Respect Human Rights at work, 2022: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The 2022 Universal Registration Document indicates it has a Guide to Human Rights is which is made available to employees and stakeholders: 'Its goal is to raise TotalEnergies employees' awareness on issues relating to human rights in its industry. [...] It offers proposed answers to common questions and concerns about human rights, notably child labor, forced labor [...]'. It also offers 'The "human rights in the workplace" e-learning course also raises employee awareness about upholding these rights and the Company's zero-tolerance policy concerning forced labor and child labor'. Moreover, 'In 2022, 200 suppliers were audited and an audit plan for 2023 targeting 300 suppliers was launched. In total, 430 high-risk suppliers in terms of human rights have been audited since 2016. These audits covered 160,000 workers of suppliers worldwide in 77 countries. 181 suppliers required the implementation of action and monitoring plans, of which 53 have been fully completed (validated by a follow-up audit) - positively impacting the working conditions of more than 14,000 of their employees. 128 suppliers are being monitored. A 2023 audit plan, targeting 300 suppliers, was defined in 2022, with the target to achieve 1,300 suppliers audited by the end of 2025'. The Human Rights Guide indicates: 'In some countries, Business units may be required by law or public officials to withhold migrant workers' Identification Documents. In such circumstances, to avoid forced labor, restriction on freedom of movement or discriminatory practices - without being in breach of the local law - dedicated procedures should be put in place to make sure that the workers agree to leave their passports, and in particular can have them back at any time'. However, this subindicator looks for proactive efforts to prevent and mitigate forced labour in its supply chain, for example through capacity building and/or collaboration with others. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [Human Rights Internal Guide, 2015: total.com] • Not Met: Factors to be considered when ending a business relationship: The webpage section Supply Chain indicates: 'The Fundamental principles of purchasing are the foundation for the long-term relationships that the Company wishes to build with its suppliers. TotalEnergies expects its suppliers to comply with these Principles and ensure that their own suppliers and subcontractors also comply with them'. It contains provisions on forced labour. However, it is not clear the factors it would consider when deciding whether to end the business relationship in the case of forced labour in its supply chain. [Supply chain_web, N/A: totalenergies.com]
H.3.PD	Prohibition of forced labour: Wage practices	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on paying in full and on time in supplier codes and contracts: The Practical Guide to Suppliers indicates: 'Wage calculation must be correct and all workers receive their agreed wages as well as all benefits to which they are entitled to in accordance with contractual arrangements. Frequency of payment must strictly comply with the legal requirement. [...] There must be no illegal deductions from wages. All legal deductions (such as taxes, social security, pensions, healthcare, etc) are paid by the employer and are deposited each pay period to the legally stipulated accounts or agencies as required by law'. The Fundamental Principles of Purchasing states: 'Provide a living wage and ensure compliance with a maximum number of working hours, adequate rest time and parental leave'. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: totalenergies.com] & [Fundamental Principles of Purchasing, N/A: totalenergies.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time: See above. However, no evidence found on how it proactively works with suppliers to pay workers regularly, in full and on time. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: totalenergies.com] & [Fundamental Principles of Purchasing, N/A: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Analysis of trends demonstrating progress
H.4.PD	Prohibition of forced labour: Restrictions on workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on free movement in supplier codes and contracts: The Fundamental Principles of Purchasing indicates suppliers should: 'Prohibit confiscation of workers' identity documents, provided that where local law requires such document to be retained, workers must have immediate and automatic access to such documents'. [Fundamental Principles of Purchasing, N/A: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes working with suppliers on free movement of workers: The Human Rights Guide indicates: 'In some countries, Business units may be required by law or public officials to withhold migrant workers' Identification Documents. In such circumstances, to avoid forced labor, restriction on freedom of movement or discriminatory practices - without being in breach of the local law - dedicated procedures should be put in place to make sure that the workers agree to leave their passports, and in particular can have them back at any time'. However, no description found of how it proactively works with its supply chain to eliminate retention of workers' documents or other actions to physically restrict movement. [Human Rights Internal Guide, 2015: total.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain: The 2022 Universal Registration Document notes: 'Between 2016 and 2018, the Company audited approximately 30 suppliers per year in terms of human rights and working conditions, and 80 to 100 between 2019 and 2021. In 2022, 200 suppliers were audited and, in total, 430 high-risk suppliers in terms of human rights have been audited since 2016. These audits covered 160,000 people in 77 countries. For 181 suppliers, it was necessary to implement action and monitoring plans, 53 of which led to complete improvements (validated by a follow-up audit) - positively impacting the working conditions of more than 14,000 of their employees. 128 suppliers are being monitored. A 2023 audit plan, targeting 300 suppliers, was defined in 2022, with the target to achieve 1,300 suppliers audited by the end of 2025'. However, no assessment of the number affected by (scope of) retaining documents or restricting movement in its supply chain found. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Capacity building to enable suppliers to cascade forced labour policies down supply chain: The 2022 Universal Registration Document indicates: 'The Fundamental principles of purchasing are the foundation for the long term relationships that the Company wishes to build with its suppliers. TotalEnergies expects its suppliers to comply with these Principles and ensure that their own suppliers and subcontractors also comply with them'. As indicated above, it contains provisions on forced labour. It adds: 'In June 2022, TotalEnergies set up a platform dedicated to monitoring supplier sustainability performance. More than 500 of the 1,300 priority suppliers invited have already joined this platform at the end of 2022'. However, no further evidence found of how it engages in capacity building specifically to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building. [2022 Universal Registration Document, 03/2023: totalenergies.com]
H.5.PD	Freedom of association and collective bargaining	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Practical Guide to Suppliers indicates: 'Suppliers must respect workers' right to form or join a trade union / collective bargaining by not refusing any genuine opportunity to associate or bargain collectively and by not doing anything that would have the effect of discouraging workers from exercising this right'. Also, 'While drafting or reviewing its company Code of Conduct or Human Rights Policy, suppliers should ensure that it covers at least the following topics: [...] Freedom of speech, association and collective bargaining, freedom of thought, conscience and religion'. Regarding the right to freedom of association and collective bargaining, the Fundamental Principles of Purchasing [a supplier document] notes: 'Allow workers to choose whether to be member of a collective bargaining organization. In countries where such right is restricted, ensure employees have the right to participate in a dialogue about their collective work situation'. It also indicates: 'Prohibit harassment and practices resulting in discriminatory treatment of workers with particular attention to recruitment, compensation, benefits, or termination'. The Code of Conduct notes: 'We are careful to create working conditions that show respect for people and that allow for freedom of association and collective bargaining. Harassment in any form is not tolerated'. [Fundamental Principles of Purchasing, N/A: totalenergies.com] & [Code of Conduct, 2021: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on FoA/CB: The 2022 Registration Document indicates: 'TotalEnergies signed in 2015 a four-year agreement with IndustriALL Global Union on the promotion of human rights at work, diversity, health and safety at work and the dialogue with employees and their representatives. TotalEnergies continues to apply the commitments of this global agreement. Through this global agreement and the Fundamental Principles of Purchasing, TotalEnergies also asks its suppliers to respect freedom of expression, association and collective bargaining and, in countries where this right is restricted, to ensure that employees have the right to participate in a dialogue concerning their collective work situation'. It adds: 'Between 2016 and 2018, the Company audited approximately 30 suppliers per year in terms of human rights and working conditions, and 80 to 100 between 2019 and 2021. In 2022, 200 suppliers were audited and, in total, 430 high-risk suppliers in terms of human rights have been audited since 2016. These audits covered 160,000 people in 77 countries. For 181 suppliers, it was necessary to implement action and monitoring plans, 53 of which led to complete improvements (validated by a follow-up audit) - positively impacting the working conditions of more than 14,000 of their employees. 128 suppliers are being monitored. A 2023 audit plan, targeting 300 suppliers, was defined in 2022, with the target to achieve 1,300 suppliers audited by the end of 2025'. However, no description found of how it proactively works to support the practices of its suppliers in relation to freedom of association and collective bargaining. It provides additional comments from its Practical Guide for Suppliers - Respect Human Rights at work, however, no further evidence found. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [Practical Guide for Suppliers - Respect Human Rights at work, 2022: totalenergies.com] Score 2 • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: See above. However, no assessment of the number affected by (scope of) restrictions to freedom of association or collective bargaining in its supply chain found. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Analysis of trends demonstrating progress: See above. However, no analysis of trends demonstrating progress found. [2022 Universal Registration Document, 03/2023: totalenergies.com]
H.6.PD	Living wage (in supply chains)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on living wage in supplier codes and contracts: The Fundamental Principles of Purchasing indicates suppliers should: 'Provide a living wage'. [Fundamental Principles of Purchasing, N/A: totalenergies.com] • Not Met: Describes work with suppliers on living wage, beyond tier 1 suppliers: The Practical Guide to Suppliers discloses comprehensive guidelines on working conditions, remuneration and compensation. However, no description found of how it proactively works to support the payment of a living wage in its supply chain, beyond Tier 1 suppliers. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to regularly review definition of living wages with relevant trade unions

I. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Environmental impact assessment and remediation	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Conducts public EIA and CIA for renewable energy projects: The 2022 Sustainability and Climate Progress Report indicates: 'we implement environmental impact assessments for all our projects, including renewable energy projects, in all countries where we operate'. The webpage section Environmental Challenges indicates: 'When a new industrial site is developed, a baseline study must be conducted. This is supplemented by environmental and social impact assessments that measure and analyze actual and potential impact, positive and negative, direct, indirect or cumulative, in the short, medium and long term of the project. Those studies are generally part of a public process involving stakeholder consultation'. However, it is not clear whether both EIA and CIA are part of all renewable energy projects, since the company refers to industrial sites and all the cases found in this webpage refer to extractive operations. In future assessments, the Company will also be expected to explain or demonstrate under what circumstances it undertakes Cumulative Impact Assessments for its renewable energy projects in order to meet this criteria. [2022 Progress Report, 03/2022: totalenergies.com] & [Environmental challenges_web, N/A: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Assessments comply with Espoo Convention and/or the EU Environmental Impact Assessment Directive and fulfil certain standards: The Safety health environment quality charter indicates: 'TotalEnergies complies with all applicable laws and regulations wherever it conducts its business and supplements them with specific requirements and commitments when necessary'. However, no evidence found that the assessments comply with the principles settled by the Espoo Convention and/or the EU Environmental Impact Assessment Directive and include all of the following: a) timely consultations with affected communities, b) activities in protected areas c) environmental impacts affecting communities (such as access to clean water, impacts on soil), d) impacts on biodiversity, flora and forestry, or natural habitats (in compliance with the Convention on Biological Diversity and other relevant instruments), e) impacts on climate change, and f) plans for restoring the impacted environment, including through compensation measures, during and upon closure of the project. [Safety health environment quality charter, 09/2021: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports on compliance with government-mandated remediation fund requirements: The 2022 Universal Registration Document notes: 'For the sites at the end of their activity, the management of pollution is determined in accordance with regulatory obligations with an objective of continuing to control the use of the sites while favoring the possibility of redeveloping Company activities (solar, reforestation, etc.) and protecting biodiversity. Specialized entities of the Company are supervising the sites' remediation operations. [...] At year-end 2022, 155 industrial sites that were no longer in operation (excluding service stations) were in the process of remediation or under monitoring'. However, no evidence found on its compliance with government-mandated remediation fund requirements. No further evidence found in the Note 12 to the Consolidated Financial Statements of the same document. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Reports on how an entity guarantees payment for environmental restoration or compensation
I.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments (including risks related to raw material sourcing, waste, and decommissioning) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to have action plans to address adverse impacts identified: Regarding the promotion of circular economy and responsible use of natural resources, the Fundamental Principles of Purchasing suggests suppliers should: 'Ensure that natural resources (water, soil, forests...) are used efficiently. Continuously seek to minimize waste production. Apply the "reduce, reuse, recycle, valorize" principles'. However, it is not clear the Company requires suppliers to have action plans in place to address potential adverse impacts identified during life cycle assessments with regular progress reporting. This should include recycling/end-of life. [Fundamental Principles of Purchasing, N/A: totalenergies.com]

J. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to prohibiting bribes to public officials: The Code of Conduct indicates: 'We maintain a policy of zero tolerance for fraud of any kind, particularly bribery and corruption, influence peddling and violations of antitrust law'. The 2022 Universal Registration Document notes: 'TotalEnergies' Vigilance Plan is based primarily on the Code of Conduct which defines the Company's values, including safety and respect for others, and their application to human rights, the environment, and people's health and safety. The Code particularly sets forth TotalEnergies' compliance with the following international standards: [...] the OECD Guidelines for Multinational Enterprises [...]'. It adds: 'TotalEnergies joined the Partnering Against Corruption Initiative (PACI)(1) in 2016, thereby adhering to the PACI Principles for Countering Corruption. The Chairman and Chief Executive Officer of TotalEnergies SE became a member of the PACI Board in 2018 and subsequently Co-Chairman of the initiative at year-end 2019. TotalEnergies is also a member of other initiatives that contribute to the global effort against corruption, such as the U.N. Global Compact since 2002 and the Extractive Industries Transparency Initiative (EITI)(2) since its launch in 2002'. The Company provides further information on the PACI and on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. However, no evidence found that the Company commits to prohibiting bribes to public officials. [Code of Conduct, 2021: totalenergies.com] & [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Expectation extends to relevant business relationships: See above. The Fundamental Principles of Purchasing indicates suppliers should: 'Prevent and ban any form of corruption: active or passive, private or public, direct or indirect'. The 2022 Universal Registration Document notes: 'The Code of Conduct, which can be accessed on TotalEnergies' website, is aimed at all employees and external stakeholders (host countries, local communities, customers, suppliers, industrial and commercial partners and shareholders)'. However, no evidence found that the Company expects business partners to commit to the principles outlined in the OECD Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions including, including, at a minimum, prohibiting bribes to public officials. The Company provides further information on the PACI. [Fundamental Principles of Purchasing, N/A: totalenergies.com] & [2022 Universal Registration Document, 03/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports on any complaints on corruption and bribery: The 2022 Universal Registration Document indicates: 'In 2022, the Ethics Committee received about 150 alerts (internal, external, anonymous) regarding compliance with the Code of Conduct, of which more than 60% were about questions related to Human Resources'. However, it is not clear any of these complaints were related to corruption or bribery. The 2023 Sustainability & Climate Progress Report states: 'A new platform launched in 2022 includes preventing and combating the risk of conflicts of interest and corruption in purchasing. More than 560 of the 1,300 priority suppliers invited joined the platform in 2022. [...] just over 200 incidents relating to fraud (excluding attempted fraud), corruption or influence peddling were identified and – where they concerned an employee – resulted in around 130 disciplinary actions, most of which entailed dismissal'. It further explains its grievance mechanisms. However, it is not clear, which incidents are specifically related to bribery/corruption. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [2023 Sustainability & Climate Progress Report, 2023: totalenergies.com] • Not Met: Reports that no such complaints were made

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.2.PD	Payments to governments & contract transparency	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Publishing a tax CbCR in line with GRI 207-4, or discloses payments made to governments at project-level including for purchase or rent of land or natural resources related to its renewable energy projects: The Company discloses a Report on the payments made to governments in its 2022 Universal Registration Document indicates: 'This report covers the aforementioned payments made in 2022 by the Company's Extractive Companies[...], for the benefit of each government of states or territories in which TotalEnergies carries out its activities, by detailing the total amount of payments made, the total amount by payment type, the total amount by project and the total amount by payment type for each project'. It includes License fees, which the Company defines by: 'license fees, surface or rental fees, and other consideration for licenses and /or concessions that are paid for access to the area where the extractive activities are conducted'. It adds: 'The Company publishes in its Universal Registration Document an annual report covering the payments made by its extractive affiliates to governments and the full list of its consolidated entities, together with their countries of incorporation and of operations'. The 2021-22 Tax Transparency Report has a session where it discloses country-by-country tax reporting on: '72 countries, which combined represent more than 90% of our corporate tax liability and more than 80 % of the Company's profit before tax'. It also reports on its 'Extractive Industries Report of Payments to Governments'. The webpage sections Business Ethics indicates: 'TotalEnergies supports governments efforts towards advancing transparency in accordance with the EITI framework. An example is TotalEnergies' public stance in favour of the publication by host governments of all our Petroleum contracts and licenses, whenever signed'. However, it is not clear it includes payments made to governments for purchase or rent of land or natural resources related to its renewable energy projects. TotalEnergies publishes a full CbCR, in line with GRI 207-4 since 2022. In future assessments, the Company will be expected to demonstrate it publishes a tax CbCR and a report on its payments to governments at project level, including for purchase or rent of land or natural resources related to its renewable energy projects [2022 Universal Registration Document, 03/2023: totalenergies.com] & [2021-22 Tax Transparency Report, 2023: totalenergies.com] • Not Met: Disclosure of terms, contracts, agreements for those payments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI

K. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Company indicates: 'Recruitment teams are trained in non-discrimination and unconscious bias. [...] Diversity and inclusion awareness actions are regularly organized with employees and managers. [...] Gender equality is fostered Company-wide through a global policy of gender diversity, quantitative targets set by the Company's executive management, human resources procedures that take gender concerns into consideration, agreements aimed at promoting a better work-life balance and actions to raise awareness and train the workforce. [...] Promoting an inclusive culture also involves changing mentalities: awareness-raising, training and communication actions, such as the Diversity & Inclusion Days are regularly carried out for managers and employees. Internal training courses for women such as Young Female Talents and How to Market Yourself or How extraordinary women communicate are offered'. It adds: 'In addition to the mandatory training programs required to remain in their job, in 2023, every employee will have the option of enrolling for up to 3 days of training of their choice each year in fields that they consider to be important for their development. [...] The Company's training catalogue offers nearly 6,000 training content (on-site and remote training) covering all technical, business and cross-functional fields, including behavioral soft skills'. However, it is not clear that the Company provides mandatory and regular (at least annual) in person, virtual, and/or written training to its staff on all types of contracts on equality, equity, diversity, anti-discrimination (including gender-based violence). [2022 Universal Registration Document, 03/2023: totalenergies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to do the same: The Fundamental Principles of Purchasing indicates suppliers should: 'Prohibit harassment and practices resulting in discriminatory treatment of workers with particular attention to recruitment, compensation, benefits, or termination'. However, no evidence was found that the Company requires suppliers to provide mandatory and annual training to its staff on equality and anti-discrimination. [Fundamental Principles of Purchasing, N/A: totalenergies.com] • Not Met: Provides materials and access to resources for trainings: The 2022 Universal Registration Document notes: 'In addition to the mandatory training programs required to remain in their job, in 2023, every employee will have the option of enrolling for up to 3 days of training of their choice each year in fields that they consider to be important for their development. The objective of the Executive Committee is that every employee can devote at least 5 days a year to their professional training. The Company's training catalogue offers nearly 6,000 training content (on-site and remote training) covering all technical, business and cross-functional fields, including behavioral soft skills. After each training session, participants, or their manager if the case may be, receive a satisfaction survey designed to assess the quality of the training and its results in the light of the stated objectives. In 2022, the satisfaction rate was 84.5%(3)'. However, no evidence found it provides materials and access to relevant resources for those who will be conducting trainings [related to diversity, equality & inclusion training]. [2022 Universal Registration Document, 03/2023: totalenergies.com]
K.2.PD	Gender balance and sensitivity	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain: The 2022 Universal Registration Document indicates: 'TotalEnergies is committed to upholding and promoting the principle of gender equality in the workplace, and ensuring and monitoring its proper application. Gender equality is fostered Company-wide through a global policy of gender diversity, quantitative targets set by the Company's executive management, human resources procedures that take gender concerns into consideration, agreements aimed at promoting a better work-life balance and actions to raise awareness and train the workforce'. It contains further information on its Diversity Policy of the Board of Directors and on its efforts to achieve gender balance in the Board. Sustainability & Climate 2023 progress report discloses data on the percentage of women workers across the Company. However, no evidence found that it commits to and adopts a timebound action plan to integrate a gender lens to human rights policies and practices including its human rights due diligence process, risk management and remedy. It should include its value chain. No further evidence found in its webpage section A Company committed to its employees. [2022 Universal Registration Document, 03/2023: totalenergies.com] & [2023 Sustainability & Climate Progress Report, 2023: totalenergies.com] • Not Met: Demonstrates progress through annual reporting: The 2022 Universal Registration Document notes: 'To ensure a better gender balance in its senior management, the Company has set itself the following targets for improvement in its highest managerial positions to be achieved by 2025, in which women comprise: 30% of the members of the Executive Committee (women represented 25% in 2022), 30% of the G70(1) (women represented 32.9% in 2022). The Company has set the same target for its other governing bodies and leadership positions, with women comprising: 30% of female senior executives (they accounted for 27.5% in 2022), 30% of female senior managers (they accounted for 23.8% in 2022)'. However, no evidence found of progress against it [towards gender sensitive approaches in its human rights policies and practices] through regular (at least annual) reporting. [2022 Universal Registration Document, 03/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Women and non-binary people make up at least 40% of the Company's board of directors and executives, or executive board: The 2022 Universal Registration Document indicates that as for March, 2023, 45.5% of the Board of Directors was made up of women. However, no information was found on the executive level. [2022 Universal Registration Document, 03/2023: totalenergies.com]
K.3.PD	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap: The Company indicates: 'TotalEnergies pledged within the World Economic Forum by signing the Closing the gender gap – a call to action'. It adds: 'In terms of compensation, TotalEnergies has been

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>adopting specific measures to prevent and compensate for discriminatory wage differentials in several countries. Regular checks are carried out during salary-raise campaigns to ensure equal pay among men and women holding positions with the same level of responsibility. Since 2019, consistent with French Act 2018-771 of September 5, 2018, on the freedom to choose one's professional future, the Company has published an index in France for its three units of economic and employee interest (UESs) on wage differentials and the steps taken to eliminate them. That index, based on a score of 100, reflects five indicators: wage differentials, pay raise differentials excluding promotions, promotion rate differentials, percentage of female employees who received a pay raise in the year they returned from maternity leave, number of employees of the under-represented gender among the ten employees who received the highest compensation'. It then discloses details of the 2021-2022 index. However, no evidence found that it has already closed the gender wage gap. This subindicator looks for evidence in relation to pay gap, rather than equal pay for equal work. [2022 Universal Registration Document, 03/2023: totalenergies.com]</p> <ul style="list-style-type: none"> • Not Met: Timebound commitment to close gender wage gap: The 2022 Universal Registration Document notes: 'At the global level, a verification of compliance with the minimum wage guaranteed by local legislation is also carried out on the base salary. In order to ensure equal pay for men and women, the Company plans to implement an annual review in all countries and a corrective action plan if necessary'. However, it is not clear it has a timebound commitment for closing the gender wage gap. This subindicator looks for evidence in relation to pay gap. [2022 Universal Registration Document, 03/2023: totalenergies.com] • Not Met: Reports information at company level across multiple pay bands: The Company reports on different gender related aspects: percentage of women on different management positions; Breakdown of workforce by gender; percentage of women among senior executives and of women among the governing body across different French subsidiaries; Wage differential; Difference in the distribution of promotions; Number of women in the 10 highest earners; Ratio of the lowest base salary by gender to the minimum salary guaranteed by local legislation, aggregated by geographical area; among other figures. However, no gender wage gap information at the Company level across multiple pay bands found. The Company provided feedback regarding this indicator, however, key evidence was already in use. [2022 Universal Registration Document, 03/2023: totalenergies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects business relationships to do the same: The Fundamental Principles of Purchasing indicates suppliers should: 'Prohibit harassment and practices resulting in discriminatory treatment of workers with particular attention to recruitment, compensation, benefits, or termination'. However, it is not clear it extends this expectation to all relevant suppliers, contractors, subcontractors, and other business relationships. [Fundamental Principles of Purchasing, N/A: totalenergies.com]

JT. Just transition[‡]

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations • Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified. • Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition. • Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.
JT.2	Fundamentals of just transition planning	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers. • Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.

[‡] Assessment for this sub section has been conducted by the World Benchmarking Alliance, see: <https://www.worldbenchmarkingalliance.org/publication/oil-and-gas/>

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.3.PD	Fundamentals of creating and providing or supporting access to green and decent jobs for an inclusive and balanced workforce	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition. • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.PD	Fundamentals of retaining and re-and/or up-skilling workers for an inclusive and balanced workforce	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy. • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection. • Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.
JT.6.PD	Fundamentals of advocacy for policies and regulation on green and decent job creation, employee retention, education and reskilling, and social protection supporting a just transition	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition. • Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition. • Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition. • Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection

M. Responses to Serious Allegations (20% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<p>According to recent data, approximately 35% of the world's polysilicon, and 32% of global metallurgical grade polysilicon, the material from which polysilicon is made, is produced in Xinjiang Uyghur Autonomous Region (XUAR). Investigations by UN bodies, academics and journalists have presented evidence on a number of human rights abuses including the use of forced labour in XUAR. In its July 2022 report to the UN General Assembly, the UN Special Rapporteur on Contemporary Forms of Slavery "regards it as reasonable to conclude that forced labour among Uyghur, Kazakh and other ethnic minorities has been occurring in the Xinjiang Uyghur Autonomous Region of China" and finds that some instances of forced labour in the Region "may amount to enslavement as a crime against humanity". The Special Rapporteur states he "considers that indicators of forced labour pointing to the involuntary nature of work rendered by affected communities have been present in many cases" in the context of "State-mandated systems". Further analysis by independent UN experts concluded that the violations in the Region "may constitute international crimes, in particular crimes against humanity" and have urged China to address their "repeatedly raised concerns about widespread violations of the rights of Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region (XUAR) on the basis of religion or belief and under the pretext of national security and preventing extremism". [United Nations General Assembly, 19/07/2022, "Contemporary forms of slavery affecting persons belonging to ethnic, religious and linguistic minority communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": documents-dds-ny.un.org] [United Nations Special Procedures, 07/09/2022, "Xinjiang report: China must address grave human rights violations and the world must not turn a blind eye, say UN experts": ohchr.org] [Sheffield Hallam University, May 2021, "In Broad Daylight - Uyghur Forced Labour and Global Solar Supply Chains": shu.ac.uk] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar value chain vulnerable to alleged forced labour in Uyghur Region, says major study": business-humanrights.org]</p>
M(0).1	Publication of independently verified full solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets	0	<p>• Not Met: The Company states that 'Whenever possible and accepted by the supplier, TotalEnergies Global Procurement carries out traceability audits prior to supplier selection. TotalEnergies Global Procurement can order these audits directly from an independent third party. In addition, TotalEnergies Global Procurement has joined a pool of US developers who are jointly and separately commissioning traceability audits. (see Universal Registration Document 2022, page 363). Both these initiatives have now led to a majority of solar panels suppliers of TGP being audited or in the process of being audited, and TGP will carry on these efforts with other suppliers.' However, this statement is not sufficient to indicate verified mapping of the Company's full solar supply chain. The Company further states that 'TotalEnergies Global Procurement systematically asks the module manufacturer for the complete list of components (Bill Of Material) with manufacturing sites and certificates of origin, before signing the contract. This document is then annexed to the contract. This requirement applies to all solar panels/modules contracts, whether they are intended for the United States or not.' However, this does not indicate independently verified disclosure of the Company's full solar supply chain. [TotalEnergies' response, 2023]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).2	<p>If mapping identifies suppliers linked to regions where there is a high risk of forced labour including those identified by UN bodies, the company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships). The company indicates that this information is relevant to all destination markets.</p> <p>•Note: Any disengagement needs to be verified and decision-making to continue engagement with “crucial business relationships” in high-risk area needs to be explained, in line with OHCHR Guidance on Business & Human Rights in Challenging Contexts: “Where a business enterprise has determined that a relationship is indeed “crucial” within the meaning of Guiding Principle 19, and that it will be continuing with the relationship on that basis, it should be transparent with stakeholders and the public at large about the decision-making process used to arrive at that determination and the criteria used, which should be objectively reasonable.”</p>	0	<p>• Not Met: The Company states that internal research showed links to a number of suppliers named in research reports by the Australian Strategic Policy Institute and the Sheffield Hallam University. It further indicates that 'It is TotalEnergies Global Procurement’s general business approach, for all procurement activities, to endeavour to diversify its supply chain on a geographical and/or a technical standpoint so as to ensure a security of supply. As far as solar panels and modules are concerned, this diversification effort applies likewise to sources of polysilicon and/or alternative technologies (not using polysilicon). The SEIA has also encouraged its members to reorient their solar supply chains to pre-existing relationships with non-Xinjiang suppliers like other regions of China (e.g. Sichuan, Jiangsu, Inner Mongolia), Germany, South-Korea (operated from Malaysia) and certain regions of the United States.' However, the company's response did not meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to leverage, and crucial nature of business relationships) at the time this research is conducted. In addition, the information provided is not sufficient evidence of full, verified disengagement as outlined in the indicator. [TotalEnergies' response, 2023]</p>

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates⁵ are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of September 2023**.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2023 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for electric utilities and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

⁵ Cut-off dates: 30 June 2023 for companies that did not engage with the benchmark; the expiration of the feedback period (between Aug/Sep 2023) for companies that engaged with the benchmark.

** Further outreach and engagement with a subset of companies on the specific issue of exposure to forced labour risks was conducted in October 2023.

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