

**Renewable Energy & Human Rights Benchmark 2025  
Company Profile**

**Company name** TotalEnergies  
**Sub-sector** Oil and Gas Company  
**Overall score** 26% weighted average

Section score	Weighting	For section
54%	20%	1. UNGP core indicators
24%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure to forced labour
17%	10%	3.b Serious allegations
21%	20%	4. Low Carbon Transition Assessment

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](#).

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 2025 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 CHRB methodology (20% of total)**

**A. Policy commitments and governance**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Code of Conduct indicates that 'Total Energies complies with [...] The Universal Declaration of Human Rights'. [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>Met: Commitment to UNGPs: The Code of Conduct indicates that 'Total Energies complies with [...] The United Nations Guiding Principles on Business and Human Rights'. [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
A.2	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: <ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: The Code of conduct indicates that 'Total Energies complies with [...] The principles set forth in the fundamental conventions of the International Labour Organization (ILO)'. It goes on to state that 'We take the necessary steps to ensure decent working conditions not only at our own sites, but also those of our high-risk suppliers. In particular, this includes a prohibition on forced labor and child labor, a commitment to non-discrimination and freedom of association'. It adds: 'We are careful to create working conditions that show respect for people and that allow for freedom of association and collective bargaining'. [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>Met: Expects business relationships to commit to ILO core principles: The Fundamental Principles of Purchasing document indicates: 'Suppliers are required to comply with [...] applicable laws, as well as principles equivalent to those set forth in [...] the fundamental Conventions of the International Labour Organization'. It adds: 'We therefore require all suppliers of goods and services to comply with these principles</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and ensure compliance by their own suppliers in turn'. Also, the policy document has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for the right to freedom of association and collective bargaining, it 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'. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a> ]
A.3	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The Code of Conduct states that 'We respect the rights of local communities by identifying, preventing and mitigating any impact on their environment and way of life and remedying the situation as needed. [...] We identify, prevent and remedy any negative impact of our activities on local communities, such as noise and odour pollution'. Regarding local communities, the Human rights guide states that '[Total] business units should "avoid, minimize, mitigate and remedy negative impacts on local communities related to their [business unit] operations'. However, no evidence found of a formal statement of policy where the Company commits to remedy any adverse impacts in individuals and workers and that it has caused or contributed to, including human rights. [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> <li>• Not Met: Expects business relationships to make this commitment: The Code of Conduct adds that it 'also applies to our suppliers of goods and services, setting out our expectations with regard to their behavior and ethical standards. They must apply standards equivalent to ours, particularly with regard to their employees, and remedy any shortcomings'. However, as indicated above, there's no clear commitment to remedy adverse impacts including human rights and workers. Furthermore, it is unclear if this extends to other business relationships such as joint ventures. [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with business relationships on remedy</li> </ul>
A.4	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Governance and Ethics Committee of the board has a supervisory role regarding these issues. According to the Human Rights briefing paper, the Ethics Committee, who also reports to the CEO present an annual report to the Governance and Ethics Committee of the Board. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> <li>• Met: CEO or board incentives: The CEO has safety performance-linked incentives (20%) that include performance on TRIR (Total recordable Incident Rate) (6%), FIR (Fatality Incident Rate) (6%) and evolution of tier 1 + tier 2 incidents (number of loss of primary containment events) (8). The CEO is a board member. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
A.5	Responsible lobbying and political engagement fundamentals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: 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: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [TotalEnergies company's advocacy directive: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Monetary value of direct political contributions: The Company does not make political contributions [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Monetary value of indirect political contributions: The Company does not make political contributions [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies)</li> </ul>

## B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Senior responsibility for HRs implementation and decision making: Responsibility at executive level is allocated to the 'President, Strategy &amp; Sustainability'. See below further details [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: The Human Rights briefing paper indicates that 'The Human Rights department in the Sustainability &amp; Climate Division, which in turn reports to the President, Strategy &amp; Sustainability, who sits on the Executive Committee, coordinates the analysis of the Company's Human Rights risks, supports operational teams and supervises the actions to promote respect for Human Rights, in close collaboration with the Ethics Committee and in accordance with the Company's Code of Conduct'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own operations: See above, in addition, 'each business segment, as well as the Global Procurement Division which is in charge of the responsible procurement program, appoints a Human Rights' coordinator or representative, whose role is to coordinate Human Rights matters in his/her respective perimeter and cooperates with the Company's Human Rights department. At the local level, our affiliates' Human Rights representatives, most of whom are Ethics Officers in our host countries or dedicated Human Rights correspondents depending on the project. These Human Rights representatives, who are located as close to the operations as possible, are in charge of promoting the values set out in the Code of Conduct among employees working at subsidiaries and ensuring that the Company's commitments are correctly implemented by local stakeholders. In a given country, our organization may be completed with Community Liaison Officers (CLOs) who are designated by certain affiliates to be in charge of the day-to-day relationship and interactions with the local communities'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Resources and expertise allocation in supply chain: See above, both business segments and the Global procurement division appoint a Human Rights' coordinator to coordinate human rights matter in their respective scope in cooperation with the Human Rights department. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> </ul>
B.2	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Describes process of identifying risks in own operations: The Human Rights briefing paper states that '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 with higher risk of impacts on Human Rights. Based on these parameters, a prioritization matrix is used to determine whether further measures are needed. These mainly include preventive measures but can also include mitigation measures that may be technical or organizational in nature'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes process for identifying risks in business relationships: The Registration document states that 'The identification, analysis and prioritization of the risks of impacts on human rights, people's health and safety and the environment as a result of Suppliers' activities rely on a CSR mapping of the risks linked to TotalEnergies' procurement, as well as on country risk indicators. The CSR mapping of the risks linked to TotalEnergies' procurement, by category of goods and services allows the identification of the risks relating to human rights and social conditions and those relating to the environment that are associated with each procurement category. This mapping is regularly updated by TotalEnergies Global Procurement, the subsidiary dedicated to procurement, based on research conducted by AFNOR experts on the human rights and environmental risks associated with each procurement category and workshops with buyers of these categories whose practical experience and knowledge greatly enhance the results of initial research'. [Registration Document 2023: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes risk identification system incl. stakeholder consultation: The Company indicates that 'As part of our Human Rights' due diligence process, we consult with potentially affected stakeholders, civil society organizations and trade</li> </ul>

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			<p>unions as relevant, and we pay particular attention to the people who are the most vulnerable to or at risk of adverse Human Rights impacts from our activities and business relationships. These include, but are not limited to, women, children, Indigenous Peoples, Human Rights Defenders, migrant workers, LGBT+ people, people with disabilities and minority groups'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how risk identification system is triggered by new circumstances: Although the Company conducts impact assessments for any new industrial project 'likely to have significant impacts on its stakeholders', no details found on how the identification process is triggered by other changes in circumstances. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
B.3	Assessing human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Describes assessment process and discloses salient HRs risks: See previous indicator. The Human Rights briefing paper continues: 'For any new industrial project likely to have significant impacts on its stakeholders, a Societal Baseline Study (SBS), an Environmental and Social Impact Assessment (ESIA) or simply a Social Impact Study (SIS) are conducted to identify the impacts of the activities on potentially affected stakeholders. In each case, such study will require engagement with stakeholders. [...] It assesses the sensitivity of the human, social, economic and cultural environment as well as the societal impacts (including Human Rights) related to the operations and the presence of the entity or affiliate. The ESIA also analyses the positive and negative, direct and indirect, actual and potential impacts of the project on people. By reference to the Human Rights Guide of TotalEnergies, impacts analysed relate to (I) Human Rights on the working place, (II) the rights of the local communities, including access to land, rights to health and to adequate standard of living, and (III) the Human Rights related to security issues'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes how process applies to supply chain: See previous indicator. The Company also reports: 'The Company's human rights and environmental experts are also involved throughout the entire process of identification, analysis and prioritization of risks. This mapping includes particular risks relating to child labor, forced labor, working conditions, discrimination, workers' health and safety, as well as risks relating to pollution and adverse impacts to biodiversity. It is available to buyers. Country risk indicators that supplement the CSR mapping of the risks linked to TotalEnergies' procurement are related to human rights and environmental country-related risks. Cross-referencing the results of the CRS mapping of the risks linked to TotalEnergies' procurement with human rights and environmental country-related risk indicators aims to identify Suppliers the most at risk regarding human rights, health, safety and the environment, to prioritize actions towards these Suppliers'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The Company indicates that 'we also carry out, where appropriate, HRIAs based on a Human Rights risk-based approach with the assistance of independent third party experts. A HRIA identifies the salient Human Rights issues of a project, allowing to take those impacts into account in the project's development through action plans'. The Company discloses a number of Human Rights due diligence processes and impact assessments. In addition, the briefing paper also collects salient issues, grouped in the four categories indicated above. HR in the workplace include health and safety, social dialogue at the workplace, compensation, discrimination, forced &amp; child labour among others. Local communities' issues include, among others, access to land, health and adequate standard of living. It also discloses issues related to security. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes how assessment involved affected stakeholders: The Company indicates that 'We engage in an open dialogue with our stakeholders including local communities, civil society organizations, Human Rights defenders and workers to better understand and address potential adverse Human Rights impacts. We also reach out to [...] our business partners and governments to build our leverage to address Human Rights issues and promote respect for Human Rights globally. As indicated above, engagement are included in impact assessment, not only identification. Although the Company reports examples, these do not refer to renewable energy operations. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
B.4	Integrating and acting on human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Describes system to prevent, mitigate and remediate HRs issues: The Human Rights briefing paper devotes its own space to each salient issue within</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impact assessments		<p>each risk category and explains the developments on the matter. See example below. The Company provides similar or more comprehensive information for all the impacts considered salient by the report. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how global system applies to supply chain</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: For instance, within the salient risk category of discrimination, one of the issues is 'non-discrimination based on religious beliefs'. Regarding this, the Company states the following: 'After the publication in 2017 of its Practical guide to dealing with religious questions, TotalEnergies has reinforced its commitment to religious diversity by participating to various events organized by the French Association of Managers for Diversity, such as the first conference about "Management of religious issues within the Company" in February 2021. Since 2020, the Company has deployed internally two conferences on dealing with religious beliefs in the workplace, in partnership with Convivencia Conseil'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken: Although the Company reports on the matter, it is through examples of Assessments in Tilenga or EACOP, which are related to Oil&amp;Gas. No evidence found of descriptions of the Company engaging with affected stakeholders generally in deciding which action plans to take in response to its salient issues for other matters (worker-related issues, or the renewable business). [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Describes system for evaluation effectiveness of actions: The Company indicates that 'HRIA action plans are also reviewed by external experts and monitored by the teams on the field by keeping continuous dialogue with the local communities that may be affected by the project and other stakeholders. Highlights of the monitoring are reported by the local teams to the business segment's Human Rights Coordinator. Adjustments to the HRIA action plans may be decided and implemented based on such monitoring'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions: Although the Company describes lessons learned in safety and human-rights related issues, such as a fatal accident in Nigeria, and security issues in Mozambique, these are either linked to Oil and Gas businesses or not learned in the context that this subindicator requires, which is, following an evaluation of effectiveness of actions taken to address a specific impact. [2024 VPSHR Report, 45717: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.6	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Provides one example of comms with stakeholders: The Company indicates that, to facilitate dialogue, 'in some Subsidiaries within the Exploration &amp; Production segment, a network of local community mediators is in place to maintain a constructive dialogue with local communities. These mediators act as Community Liaison Officers (CLO) and are tasked with establishing an ongoing dialogue with stakeholders on the ground (Stakeholder Engagement), including local authorities and communities and, more broadly, local players in civil society. Employed by TotalEnergies, sometimes coming from the local communities, they speak the local languages and understand local customs. They play a decisive role which is crucial in establishing good relations between TotalEnergies and its stakeholders and pay close attention to the most vulnerable populations'. However, no example was found of concrete communication with affected stakeholders regarding a specific raised issue. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### 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> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company indicates that 'TotalEnergies has several whistle-blowing mechanisms that are open to employees, Suppliers and third parties'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company indicates that it 'has a variety of communication and information channels in place, enabling all employees of TotalEnergies SE and its Subsidiaries to have access to the Action Principles defined by the Company in relation to human rights, health, safety and the environment. Each employee receives a copy of the Code of Conduct to raise awareness of the Company's values, including safety and respect for others, which includes respect for human rights. The Code of Conduct is also available to them on the TotalEnergies intranet website in more than fifteen languages. Every new employee is required to read the Code of Conduct (and must certify to having done so). The TotalEnergies induction day includes an initiation to ethics and human rights and an online training on the challenges of business ethics is also available'. It is not clear, however, whether grievance mechanisms are available in all appropriate languages. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: The Fundamental Principles of Purchasing indicates: 'Ensure workers can express grievances and concerns without fear of reprisal'. In future assessments the Company will be expected to demonstrate this applies to all business relationships. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Expects business relationships to convey expectation to their business relationships: See above. The Human Rights Guide states: 'We expect our suppliers and contractors to adhere to standards that are equivalent to ours, in particular towards their employees, and to make ongoing efforts so that their own suppliers and subcontractors also respect these principles'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
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> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates that 'TotalEnergies has several whistle-blowing mechanisms that are open to employees, Suppliers and third parties'. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Briefing paper indicates that 'we set up channels accessible to local communities and residents to provide appropriate response to adversely affected stakeholders. As regards community grievance management, an internal guide, adopted in 2020, describes the methodology and procedures for managing individual and collective grievances resulting from Activities, based on the UNGPs effectiveness criteria among which the criteria of being based on engagement and dialogue or of accessibility. For example, accessibility can be limited in practice notably when there is no access to technology or cell phones). It is therefore necessary to use alternative awareness raising spots such as radio, podcasts, flyers like in Uganda, or even dedicated physical mail boxes where a claim made on paper can be posted like in Papua New Guinea. Having a common understanding with our stakeholders of the necessity of the grievance mechanisms is paramount to the relationship with them'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The Company indicates that 'The Company's employees, Suppliers, as well as any other stakeholder can contact the Ethics Committee to ask questions or report any incident involving a risk of non-compliance with the Code of Conduct'. However, it is not clear whether suppliers' and other business relationships' external individuals and communities have access to it. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects business relationships to convey expectation to their business relationships</li> </ul>
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> </ul>

## 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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Human Rights briefing paper states that 'We respect the rights of Indigenous Peoples and recognize</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	indigenous peoples' rights		<p>the International Labour Organization (ILO) Convention N°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 Performance Standards (IFC). In particular, we engage with communities and communicate with them on our plans and inform them of the status of our project. We have issued a Charter of Principles and Guidelines regarding Indigenous and Tribal People to conduct our projects with careful consideration of their rights and, while respecting applicable law'. it is not clear, however, if it requires the same commitment through its value chain. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Description of process for identifying indigenous persons and customary lands.: The Human rights guide states that '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 preestablishment 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'. [Human Rights Internal Guide, 2015: <a href="https://total.com">total.com</a>]</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company reports that it signed FPIC agreements between EACOP (East African Crude Oil Pipeline Project) and the Akie Community in July 2022, with the Taturu community in March 2023 and with the Barabaig community in January 2024. These, however, are not related to renewable energies business. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Commitment to FPIC: No evidence found of a Company-wide statement where the Company commits to FPIC, including the right to define the process by which FPIC is achieved and to withhold consent, regardless of an opposing claim by the government. Although the Company has reached FPIC agreements in Tanzania, it's in the Oil&amp;Gas business. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
D.2.PD	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how local communities identified and engaged in the last two years: Although the Company provides a description, it consists of an example for Tilenga and EACOP projects, related to Oil&amp;Gas business.</li> <li>• Not Met: Provides two examples of engagement with communities: Although the Company reports on these issues, no evidence was found outside oil&amp;gas context operations. Evidence should at least cover renewable business as well.</li> <li>• Not Met: Examples of engagement refer to marginalised groups and provide additional detail: Although the Company reports on these issues, no evidence was found outside oil&amp;gas context operations. Evidence should at least cover renewable business as well.</li> <li>• Not Met: The company meets B2.C, B3.D, B4.D and B.5.C</li> </ul>
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to identify benefit and ownership sharing: The Registration document states that, in France, 'The Company develops agrivoltaics projects that respond to the challenges of the agricultural world, as illustrated by the conclusion in March 2022 of an innovative partnership agreement with the National Federation of Farmers' Unions (FNSEA) with the aim of promoting the emergence of circular economic networks, the acceptability of projects and the sharing of value with farmers'. However, no policy statement was found where the Company commits to identify potential benefit and ownership sharing options that serve affected communities and indigenous peoples. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Commitment includes right to decide own priorities for communities</li> <li>• Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing</li> <li>• Not Met: Disclosure how affected communities participated in decision-making</li> </ul>
D.4.PD	Local wind & solar energy access, affordability	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Actions taken to support access and affordability of renewable energy in the value chain: Although the Company reports in relation to access to energy, it seems to be in the context of its commercial operations (TotalEnergies Off-grid Solar Solutions, a partner to the company which provides solar solutions for customers) [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Public support for government policies addressing energy access</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Including a timebound actions plan and reporting targets

## 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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Policy commitment to respect land ownership/natural resources: The Human Rights Guide states that '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 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'. No details found, however, in relation to cases where land and ownership rights are customary and/or not formally recorded. [Human Rights Internal Guide, 2015: <a href="#">total.com</a>]</li> <li>• Met: Identification of legitimate tenure rights holders: The Human Rights briefing paper discloses the case of Tilenga Project in Uganda. Although this is a specific example in Oil&amp;Gas business, the explanation seems to indicate that this is applied for any project: 'Like any infrastructure construction project anywhere in the world, the completion of the Tilenga and EACOP projects require the implementation of a land acquisition program which include that the lands are acquired by the Government, which later grants use or leases rights to the projects' operator. This land acquisition program was initiated in 2019 and has been carried out in compliance with IFC performance standards (PS) as follows: 1) Planning &amp; Consultation: presentation made to local communities to describe the process for land and crop surveys, compensation, relocation and support for those affected. These presentations are delivered in the relevant local languages: English, Lugungu, Alur, Acholi or Runyoro. Resettlement action plans for the Tilenga project are prepared and adopted in consultation with the impacted stakeholders. 2) Cadastral surveys of land and structures are conducted. Trees and cultivated plants are identified, and their values are defined. The process involves community leaders as well as local and central government officials. Third parties help to identify stakeholders and impacted people. Vulnerable groups are identified and regularly re-evaluated. The cut-off date for these evaluations is determined and communicated [...]. [Human Rights Briefing Paper 2018-2023, 45292: <a href="#">totalenergies.com</a>]</li> <li>• Not Met: Extends expectation to business relationships</li> <li>• Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose</li> </ul>
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> <ul style="list-style-type: none"> <li>• Not Met: Commitment to follow IFC PS 5 for physical and economic displacements: Although the Company reports a case where the land acquisition program was carried out 'in compliance with IFC performance standards', no public commitment was found to follow IFC Performance Standard 5</li> <li>• Not Met: Description of compensation for resettlement: As above, this subindicator looks for a specific statement of commitment, rather than a case study in particular locations (which also refer to Oil&amp;Gas)</li> <li>• Not Met: Publishes statistics on numbers affected by relocations (current and planned projects): The Company reports statistics in relation to Oil&amp;Gas operations, not renewable energies.</li> <li>• Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement: As above. The Company does not report information required by this subindicator for renewable projects</li> </ul>

## F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Commitment to heightened HRDD in conflict affected areas: The Company indicates that 'Since Companies activities in conflict-affected areas cannot be without impact, TotalEnergies is committed to conduct Heightened Human Rights</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Due Diligence (HHRDD) on an ongoing basis by identifying potential and actual impacts on people and context. [VPSHR Annual Report 2023: <a href="https://www.totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Steps taken to assess and mitigate these risks with conflict sensitive lens: The 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'. Then it describes different cases where it resorted to specific experts in Mozambique, Uganda and Tanzania. Although all cases refer to Oil&amp;Gas business these seem to be explained as an exemplification of the Company's general approach. [Registration Document 2023: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Not 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'. However, no evidence was found to demonstrate how this conflict sensitive lens is applied to situations outside of security providers. [Human Rights Internal Guide, 2015: <a href="https://www.totalenergies.com">total.com</a>]</li> </ul>
F.2.PD	Evidence of security provider human rights assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Description of implementation of security approach and example: The Company indicates that 'In certain situations, intervention by the Government Security Forces and by Private Security Companies may be necessary to protect TotalEnergies' staff and assets. In order to prevent any misuse of force, TotalEnergies is committed to implementing the Voluntary Principles on Security and Human Rights (VPSHR) issued by States, NGOs and extractive companies. TotalEnergies has joined the VPSHR Initiative (VPI) in March 2012 as a member and is continuing its efforts to further embed and promote the VPSHR into its day-to-day business activities. Compliance with the VPSHR is based on two major actions: the identification of risks and awareness-raising trainings. For the risks identification, since 2016, TotalEnergies has been using a VPSHR auto-diagnostic tool (AD) and a VPSHR risk-assessment tool (RA), 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'. The VPSHR report states that 'Specific materials have been adapted for [...] Renewables &amp; Power branches. Corporate Security will continue its work on specific materials for new entities, giving them indications to adopt an action plan to align their security standards with those of the Company and to integrate the Company's security reference framework (rules and implementation guide)'. [VPSHR Annual Report 2023: <a href="https://www.totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Description of monitoring of business partners: Evidence disclosed by the Company refers to Oil&amp;Gas-related operations</li> <li>• Not Met: Local communities engaged in assessment of security: Evidence disclosed by the Company refers to Oil&amp;Gas-related operations</li> <li>• Not Met: Example of working with community on this issue: The Company indicates that 'TEPMA1 regularly discloses information about security arrangements, including the roles and responsibilities of security personnel, to local communities and stakeholders. This transparency helped building trust and allows for community concerns to be addressed proactively. Establishing mechanisms for ongoing dialogue with local communities to understand their perspectives, address grievances, and involve them in decision-making processes related to security measures was key. This participatory approach helped prevent conflicts and ensure that security practices are contextually appropriate. In addition, TEPMA1 advocated for the nomination of a dedicated team in charge of community relations within the JTF. Since June 2021, 6 Commanders were regularly engaging with the community leaders and leading different initiatives to improve the relationship with the civilian population such as sport events or the contribution to waste management activities'. However, evidence refers to Oil&amp;Gas activities. [2022 VPSHR Annual Report, 04/2023: <a href="https://www.totalenergies.com">totalenergies.com</a>]</li> </ul>

## G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Responsible sourcing of minerals: arrangements with suppliers	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Statement on OECD Guidance aligned due diligence</li> <li>• Not Met: The policy explicitly covers all minerals</li> <li>• Not Met: Policy expectations of suppliers</li> <li>• Not Met: Contractual requirement for smelters/refiners to follow OECD</li> </ul>
G.2.PD	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Identification and mapping of suppliers: The Company indicates that an internal study identified priorities in cobalt, polysilicon and conflict minerals. It also indicates that relies on different means like Extended Minerals Reporting Templates (Cobalt), traceability audits (polysilicon) and Conflict Minerals Reporting Template for the case of conflict minerals. No further details found on processes to identify and prioritize specific risks and impacts. No evidence was found on how the company maps and identifies suppliers. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Traceability system for mineral supply chain</li> <li>• Not Met: Discloses smelters/refiners that are most significant part of supply chain</li> <li>• Not Met: Suppliers in higher risk activities, geographies, products</li> </ul>
G.3.PD	Responsible sourcing of minerals: risk identification in mineral supply chains	0	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Identification and prioritising of risks in supply chain</li> <li>• Not Met: Expectation on suppliers to disclose</li> <li>• Not Met: Processes cover minerals assessed as highest risk</li> </ul>

## H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Commitment to respect the rights of human rights and environmental defenders	0.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs: The Company indicates that 'As part of its activities, TotalEnergies promotes dialogue and discussions with human rights defenders, as defined by the United Nations Declaration on Human Rights Defenders'. It also states that 'TotalEnergies EP Uganda and EACOP are committed to respecting the rights of Human Rights Defenders (HRDs) in relation to the projects'. It also reports in relation to human rights defenders and specific projects and locations. However, this indicator looks for a formal, company-wide commitment to not tolerate nor contribute to intimidation against human rights defenders. Additionally, specific reports relate to Oil&amp;Gas operations rather than renewable energy business. [Tilenga HRIA, 01/2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expectation on business partners in value chain to make this commitment</li> <li>• Not Met: Description of how working with HRDs as part of risk assessment and DD: The Company indicates that 'TEPU are committed to respecting the rights of Human Rights Defenders (HRDs) in relation to the projects. They regularly engage with the government, petroleum authorities, police, and civil society to discuss the importance of freedom of expression, peaceful protest, and an open civic space. They have published their positions and policies on HRDs on their websites, and they have provided various channels for stakeholders to make complaints or raise alerts, such as an office in the project area, a toll-free number, Community Liaison Officers (CLOs), an email service and contact through traditional leaders and district authorities'. However, no details found on the actual work conducted, including them as part of risk assessment. In addition, evidence should refer to renewables business.</li> <li>• Met: Description of how working with HRDs to create safe and enabling environment: The Human Rights briefing paper indicates that 'We believe in the necessity for an open civic space and the role of civil society organizations and Human Rights defenders (HRDs) to ensure the respect for Human Rights and to voice the concerns of rightsholders. Where appropriate, we seek to build and exercise our leverage to encourage our business partners, to respect these principles in relation to our activities'. The company provides specific examples (although examples refer to Oil and Gas, the general statement refers to the whole company. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

## I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Health and safety	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: Although the Company makes a comprehensive description of its management systems and measures to prevent accidents, health risks and major industrial accidents, no evidence was found on the specific process it follows to identify which are the health and safety risks and impacts that it faces. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Discloses quantitative information on H&amp;S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company discloses TRIR (Injury Rate) for the last eight reporting years, being 0,63 in 2023. The Company reports 'two accident-related fatalities in 2023 among contractors staff'. [Sustainability &amp; Climate 2024 progress report: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects disclosure of H&amp;S information of relevant business relationships: No evidence was found of similar requirements beyond contractors</li> <li>• Met: Targets for H&amp;S performance (including injury rates or lost days and fatalities): The Company discloses targets on fatalities, 'zero fatal accidents' and TRIR: 'Continuously decrease the TRIR and achieve a TRIR of 0.6 by 2025. The 2024 target was 0.62'. The Company reports that it has achieved TRIR target (0,55 in 2024), but it had 1 fatality in 2024'. In relation to it, it indicates the following: 'there were regrettably one fatal accident among contractors' personnel in 2024. In July in Nigeria, a worker lost his life during inspection work requiring rope access at height. In response to this accident, specific preventive measures were taken at Company level, over and above the global programs already in place, in particular the reinforcement of supervision of this type of work and the development of new technologies (drones, robots) to reduce the use of rope access'. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
I.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: Despite having allocated board oversight of human rights, no details were found in relation to oversight of supply chain policies that address forced labour and a description of how the experiences of affected people inform board discussions. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Capacity building with suppliers: The Company indicates that it 'regularly conducts awareness-raising actions with its Suppliers on the responsible procurement approach, particularly on respect for human rights, [...]'. In 2024, the Company organized supplier days, [...] notably in China. The Company has also raised awareness among its Suppliers through training sessions entirely dedicated to sustainable development, such as the one organized in 2024 in Angola. In order to support its Suppliers in improving their practices, the Company also published in May 2022 a Practical Guide on Human Rights at Work for Supplier [...]. The Company also organizes a Suppliers Day every two years, the last having been organized in November 2024'. However, no specific details found on capacity building related to forced labour. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Company indicates that 'Forced labour is an issue affecting countries and supply chains where migrant workers or other vulnerable people such as women are part of the local working ecosystems. TotalEnergies remains particularly vigilant through its suppliers and contractors' qualification process notably by enhancing its buyer's awareness on such topics. In May 2022, the Company published a Practical Guide on Human Rights at Work for Suppliers to give buyers tips and reflexes to track potential Human Rights issues at the suppliers' and contractor's end and to address those during the contractual relationship. Child labour and forced labour are key focus points in this Practical Guide. Webinars have been organized in 2022 by TotalEnergies Global Procurement to introduce and explain the Guide to Buyers'. However, no details found in relation to efforts to prevent or mitigate this issue in its own operations. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.3.PD	Prohibition of forced labour: Wage practices	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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'. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time: Although the Company describes awareness-raising and training of suppliers (see previous indicator), no evidence was found of specific topics treated, including wages and recruitment practices. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Employer Pays Principle in policy for own ops and supply chain: Fundamental principles of purchasing state that 'Ensure that no recruitment fees are charged to the worker'. No further details found. The evidence found does not apply to the Company's own operations and commitment to reimburse if recruitment fees or related costs are paid. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
I.4.PD	Prohibition of forced labour: Restrictions on workers	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts and own operations: Fundamental principles of purchasing state requires to '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: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers: Although the Company reports training on the Practical Guide on human rights to buyers, and the registration document explains awareness and training for suppliers, no details found how it works with suppliers to help them improve on this topic. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Description of implementation and monitoring of this practice: Although the Company reports training on the Practical Guide on human rights to buyers, no details found how it specifically monitors this issue with employment agencies. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
I.5.PD	Freedom of association and collective bargaining	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• 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: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB: Although the Company reports conducting training with suppliers, no specific details found in relation to these topics. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain: Although the Company reports auditing supply chain including freedom of association, no details were found in relation to an assessment of potential people affected by issues related to this and collective bargaining. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Global Framework Agreement: The Company had (no longer in place) a Global Framework Agreement in place during the period 2015-2019. The latest Registration document states: 'At the global level, TotalEnergies signed in 2015 a four-year agreement with IndustriALL Global Union(2) 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'. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
I.6.PD	Living wage (in supply chains)	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Requirements on living wage in supplier codes and contracts: 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'. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage: The Practical Guide to Suppliers discloses 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'. [Practical Guide for Suppliers - Respect Human Rights at work, 2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Description of process to determine living wages with unions: The Company indicates that 'Since 2021, TotalEnergies assesses any discrepancies between direct remuneration and the living wage in all its subsidiaries(2). The result of the studies carried out show that, since the end of 2022, the Company had reached its target, as 100% of employees received direct remuneration at least equal to the living wage in the country or region in which they work. A living wage is defined as an income that allows employees: to provide a decent life for their family; for standard working hours; to cover their essential expenses (food, water, electricity, housing, education, health, clothing, etc.); the ability to cope with some of life's uncertainties'. In a footnote, it clarifies that 'TotalEnergies relies on the global database provided by the Fair wage Network, which assesses the living wage for a given country or region, based on the typical family size (number of children) and the average number of workers (between one and two per household)'. It also indicates that 'The result of the studies carried out show that, since 2022, the Company has attained the objective it had set itself, since 100% of employees received direct remuneration at least equal to the living wage in the country or region where they work'. Although it does not clarify whether trade unions are involved, worker representation reaches more than 90% of the workforce. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

## J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Environmental impact assessment and remediation	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Conducts EIA 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'. [2022 Progress Report, 03/2022: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Publishes EIA for renewable energy projects: Although the Company indicates that in the EU it complies with laws and technical screening criteria and that, outside the EU, 'an environmental impact assessment or an appropriate screening is completed for each activity', no evidence found of EIAs for renewable energy projects being publicly available. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Explains when CIA is conducted: The Company indicates that '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 socioeconomic 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'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
J.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Expectation for suppliers to conduct regular public life cycle assessments</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• 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. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

## K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Anti-corruption due diligence and reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to prohibiting bribes to public officials: The Code of Conduct indicates that 'We maintain a policy of zero tolerance for fraud of any kind, particularly bribery and corruption, influence peddling and violations of antitrust law'. The Registration document adds that '[the Code] is complemented by a regularly updated set of anti-corruption standards. This set applies to all companies controlled by the Company [...] Particular attention is paid to representatives (agents or others) dealing with public officials for whom the applicable internal rule specifically provides for mandatory due diligence and monitoring by operational staff [...]'. However, no explicit commitment was found including active or passive bribery including public officials or their relatives and associates. [Code of Conduct, 2021: <a href="https://totalenergies.com">totalenergies.com</a>] &amp; [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expectation extends to relevant business relationships: The Fundamental Principles of Purchasing indicates suppliers should: 'Prevent and ban any form of corruption: active or passive, private or public, direct or indirect'. However, no reference was found to bribery of public officials or their relatives/associates. Furthermore, it is unclear if the expectation applies to all business relationships. [Fundamental Principles of Purchasing, N/A: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Reports on any complaints on corruption and bribery: The Company reports that 'In 2024, TotalEnergies was not subject to any convictions and did not receive any fines for violations of anti-corruption legislation and acts of corruption. The Company processed reports and proven cases of corruption, and in accordance with the "zero tolerance" principle, proven cases were subject to disciplinary sanctions and remediation measures'. However, no details found in relation to number of reports or proven cases of corruption. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
K.2.PD	Payments to governments & contract transparency	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Publishing a tax CbCR in line with GRI 207-4: The Company publishes a Tax transparency report covering its main countries of operation. [2023 Tax Transparency Report: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Disclosure of terms, contracts, agreements for those payments</li> <li>• Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI</li> <li>• Not Met: Disclosure of payments for land purchase made to governments at project-level</li> </ul>

## L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.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> <ul style="list-style-type: none"> <li>• Not Met: Provides mandatory and regular training as per ILO No 190: The Company indicates that 'To promote diversity, the Company takes care to raise awareness among its employees and provides training. To do this, it relies on a number of documents, accessible to all [...] Employees can also access a wide range of e-learning material and training courses on the themes of diversity, unconscious bias and non-discrimination via the TotalEnergies training platform. In 2024, a comprehensive awareness kit was made available to managers so that they could organize a moment of exchange with their teams around the world. However, no evidence found of Company-wide mandatory training as per ILO Convention 190 [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to provide training: 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: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Provides materials and access to resources for trainings</li> <li>• Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it</li> </ul>
L.2.PD	Gender balance and sensitivity	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain</li> <li>• Not Met: Demonstrates progress through annual reporting</li> <li>• Not Met: Women and non-binary people make up at least 40% of the Company's executives: The registration document reports 29,5% of female senior executives in 2024 and 22.7% in executive committee. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company indicates that, as of march 2025, 45,5% of the board is composed by women. It clarifies that 'Excluding the directors representing employees in accordance with Article L. 225-27-1 of the French Commercial Code and the director representing employee shareholders in accordance with Articles L. 225-23 and L. 22-10-5 of the French Commercial Code'. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
L.3.PD	Gender wage gap reporting	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Has closed gender wage gap or timebound commitment: The Company indicates that 'TotalEnergies has continued to take steps to maintain pay equity between men and women: The results of the Leyre index [...] are stable for UES AGSH and UES MS, 93/100 and 92/100 respectively (iso versus previous period, 2022-2023) and have improved for UES RP with a 100/100 score (versus 99/100 for 2022-2023). The Company has carried out studies to analyze the pay gap between men and women at equivalent levels of responsibility, first in France and then progressively worldwide, enabling it to implement specific measures to prevent and compensate for any unjustified pay gaps'. However, no specific details were found in relation to whether there's a gender wage gap within the Company, if it's closed or if there's a timebound commitment to do so. The Company does show quantitative figures on equal pay comparison. It's not clear the pay gap situation. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Reports information at company level across multiple pay bands: The Company discloses different ratios and figures on wage. However, it is not clear whether there are wage gap differences, including across multiple pay bands. [2024 Registration Document, 2025: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Expects business relationships to do the same</li> </ul>

## 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"> <li>• Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations: The Company states that 'TotalEnergies maintains a dialogue with the Company's employees and their representatives, who have a privileged position and role, particularly in discussions with management teams. Social dialogue is one of the pillars of the Corporate project. In order to associate the employees to the major challenges of the Company, the expectations of employees are regularly listened to and discussed. TotalEnergies regularly involves them in participatory processes' [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.: The Human Rights briefing paper indicates that 'The Company has embarked on an in-depth transformation that is only possible with the women and men of the Company. To promote a just transition and support TotalEnergies employees in this transformation, the Transforming with our people program was launched at the end of 2022, focused on three actions: listening, informing and training'. [Human Rights Briefing Paper 2018-2023, 45292: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition.: See above. Regarding the 'listening' part of the program: 'Tools have been deployed to measure knowledge,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>understanding and support for TotalEnergies' ambition, as well as the feelings and state of mind of the Company's teams in the field. The latest TotalEnergies Survey showed that 86% of employees are aware of the Company's ambition and 87% are confident in TotalEnergies' ability to meet its targets. Furthermore, TotalEnergies is developing exchange formats between members of the Executive Committee and employees, in order to listen to their proposals on key issues for the Company'. Concerning the 'informing' part of the program: 'The Live Round Tables program was deployed to present the emblematic projects of the Company's transition and make heard the voices of the Company's men and women who are leading them. This 18-month program, which took place from January 2022 to July 2023, highlighted 32 projects. In 2023, episodes focused on biodiversity, waste-to-energy (biogas), responsible purchasing and energy storage systems'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.: The 'Transforming with our people program' 'includes not only the implementation of listening, informing and training measures, but also an upskilling and reskilling initiative, and the implementation of a skills map in order to build bridges between current jobs and the jobs of renewables &amp; electricity, and to target key skills'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>
JT.2	Fundamentals of just transition planning	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning.: The Registration document indicates that 'In France, TotalEnergies shares the ambitions of its transition strategy with its local public and private stakeholders, builds links with them, encourages dialogue focused on the territories, forms partnerships with the regions and conurbations, integrates itself into the territories by participating in certain regional bodies as close as possible to regional decision-makers and supporting its transition by involving the Company's segments. The challenge is above all to establish a territorial dialogue on the issues of energy, economic development, heritage and the integration of young people. In each region, since 2022, think tanks enable dialogue with stakeholders on regional issues linked to energy and the energy transition (acceptability of renewable energies, skills, sobriety, technological issues, energy choices, just transition, etc.). The meetings held in 2022 and 2023 brought together more than 500 participants and produced recommendations and actions which were published by region and shared with stakeholders'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers.</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders</li> <li>• Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.</li> </ul>
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"> <li>• Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: As indicated above, the program includes an 'upskilling and reskilling initiative, and the implementation of a skills map in order to build bridges between current jobs and the jobs of renewables &amp; electricity, and to target key skills'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders.</li> <li>• Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders.: The Company indicates that 'TotalEnergies supports the creation or maintenance of sustainable jobs in France by granting loans to SMEs, particularly those with projects that contribute to the ecological and energy transition. Between 2021 and 2023, loans were granted to 383 SME projects, amounting to a total of €14.7 million, and over 10,000 jobs were supported'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups</li> </ul>
JT.4.PD	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company states that 'As part of its just transition plan, TotalEnergies has designed the "Visa for TotalEnergies" program as a global "upskilling" program aimed at preparing all employees for the new challenges facing the Company and society in general, and supporting the development of their skills. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and balanced workforce		<ul style="list-style-type: none"> <li>• Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition.</li> <li>• Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders.: See above. 'This multi-year training program is deployed in several seasons, each one devoted to a key aspect of TotalEnergies' transition. After a first season focusing on the climate challenges and the answers provided by the Company's ambition, season 2 has enabled to train more than 27,000 employees in 118 countries in the fundamentals of electricity, the main lever for decarbonizing the energy mix (production, uses, value chains, markets and business models)'. [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not 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.</li> </ul>
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders.</li> <li>• Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection.</li> <li>• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.</li> <li>• Not Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.</li> </ul>
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"> <li>• Met: Discloses process(es) for aligning its lobbying activities with policies and regulation supporting the just transition.: The Company has a section on its report on 'advocacy and sector initiatives in support of the energy transition'. It discloses all initiatives it supports broken down by 'axes'. In relation to these, it states that 'TotalEnergies has conducted a biannual assessment of the public positions on climate and other issues of the main industry organizations of which it is a member. The Company examines whether those positions are aligned with its own, based on the six principles from its Advocacy Directive', [Registration Document 2023: <a href="https://totalenergies.com">totalenergies.com</a>]</li> <li>• Not Met: Discloses where its lobbying activities do not align with policies and regulation that support the just transition.</li> <li>• Not Met: Discloses action plan addressing misalignment of lobbying activities with policies and regulation that support just transition.</li> <li>• Not Met: Demonstrates lobbying for just transition and regulations enabling green and decent jobs, reskilling and/or social protection</li> </ul>

### 3.a Response to risk of exposure to forced labour (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(0).0	Serious risks of supply chain forced labour		<ul style="list-style-type: none"> <li>• Area: Exposure to high risk of forced labour</li> <li>• Story: 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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			communities - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences": <a href="https://documents-dds-ny.un.org/doc/UNDOC/ID/48/16/2022/04/22/Draft_Special_Report_of_the_Special_Rapporteur_on_Contemporary_Forms_of_Slavery.pdf?OpenElement">documents-dds-ny.un.org</a> ] [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": <a href="https://www.ohchr.org/en/press-releases/2022/09/un-experts-xinjiang">ohchr.org</a> ] [International Service for Human Rights, "Repository of United Nations recommendations on human rights in China": <a href="https://www.ishr.ch/">ishr.ch</a> ] [Business and Human Rights Resource Centre, 02/08/2021, "China: Significant proportion of global solar panel supply chains to raw materials level, including names of suppliers and locations for all destination markets"]
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>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Public commitment to full solar supply chain transparency: "In response to the BHRRC's study in 2021, the Company states that "[w]henver 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 full transparent mapping of the company's solar panel supply chain. [Business and Human Rights Resource Centre, 26/07/2023, "TotalEnergies response": <a href="https://media.business-humanrights.org/en/media/document/totalenergies-response-to-bhrcc-study">media.business-humanrights.org</a>]</li> <li>• Not Met: Publication of verified full solar supply chains: In its Sustainability &amp; Climate 2024 Progress Report, TotalEnergies shared that it hired GoodCorporation to conduct external audits on four affiliates located in Vietnam, Morocco, South Africa, and Congo. Furthermore, the Company stated that "an audit plan targeting 300 suppliers was launched, with the aim of reaching 1,300 audited suppliers by the end of 2025. From 2016 to date, 740 potentially high-risk suppliers in terms of human rights have been audited, in 86 countries, involving 100 affiliates and covering 230,000 people. 385 of these required the implementation of corrective measures." However, the information published does not meet the required standards as set out in this indicator. No information was found on the names and locations of suppliers for all destination markets. [Sustainability &amp; Climate 2024 progress report: <a href="https://totalenergies.com/en/our-approach/sustainability">totalenergies.com</a>]</li> </ul>
M(0).2	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)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Steps taken aligned with UNGPs: In response to the BHRRC's study in 2021, 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 "[i]t 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. No evidence of verified full disengagement was found. [Business and Human Rights Resource Centre, 26/07/2023, "TotalEnergies response": <a href="https://media.business-humanrights.org/en/media/document/totalenergies-response-to-bhrcc-study">media.business-humanrights.org</a>]</li> <li>• Not Met: Information relevant to all destination markets</li> </ul>



### 3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Discrimination</li> <li>• Headline: Gendered impacts of TotalEnergies' solar Farm project in Uzbekistan</li> <li>• Story: French energy company Total Eren is about to finalize the construction of a 100 megawatt solar farm in the Samarkand region of Uzbekistan. The project is funded by the European Bank for Reconstruction and Development and the European Investment Bank, with total investments of over 65 million euros. However, locals who live just 100 meters from the project site continue to struggle with electricity shortages, water scarcity, and unemployment. The women Bankwatch interviewed during a fact-finding mission in the area also said they have to pay for drinking water and gas delivered from another region, while having no permanent job or social assistance. "I am divorced, and my sister's husband works in Russia. He hasn't been at home for two years. We live together to help with children and the household. We weave carpets and sell them at the local market for \$30. But it takes months to make one. We really need this work at the solar farm," said the woman. "Only three women are employed at the project for cleaning work. The rest are men and mainly from another settlement. We would like to get a job there, even for cleaning tasks," said one of the women interviewed by Bankwatch. During an online meeting that Bankwatch held with representatives of Tutly Solar LLC, a subsidiary of Total Eren, the company said it has a high share of women employees, including those in decision-making positions. However, exact data was not provided. Company representatives also confirmed that no professional training to enhance employment opportunities among local women has been considered.</li> </ul> <p>The project documentation doesn't include any sex-segregated data to identify risks and effective mitigation measures. The only proposed strategy for addressing gender-based violence and harassment at the project site is by ensuring separate gender accommodation. But considering the small number of women employees and the influx of male workers, the risk of gender-based violence and harassment may increase for female residents.</p> <p>Gender-specific issues aren't addressed in the grievance redress mechanism either; the local authority or contractor is the only proposed entry point for filing a complaint. Considering the existing power imbalance and nepotism in Uzbekistan, this mechanism won't serve its purpose, especially for women [The Diplomat, "Solar Energy Project Leaves Uzbek Women in the Dark", 03/08/2022: <a href="https://thediplomat.com">thediplomat.com</a>]</p>
M(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Met: Public response: The Company responded to the Business and Human Rights Resource Centre inquiry. [Business and Human Rights Resource Centre, "Total Energies responded", 06/10/2023: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not Met: Detailed response: The Company's response is addressing the questions raised by the BHRRC. However, the Company is not addressing the allegation of gender-based discrimination experienced by women in the local community at this stage of the project lifecycle. [Business and Human Rights Resource Centre, "Total Energies responded", 06/10/2023: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
M(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: The Company outlines the stakeholder engagement actions undertaken during the planning phase of the projects, stating "Regarding the Tutly Project, multi-dimension consultation activities were adopted to make marginalized, voiceless youth and women to gain information about the project. The teams managed to collect information about community concerns regarding the project during various implementation phases. Women were informed about grievance mechanism procedure and grievance mailboxes were installed (two in Tutly village and one on site) which are checked continually (see picture below). During these meetings, representatives of women's committee of Tutly village were also encouraged to explain grievances mechanism to all women.". No evidence was found on engagement with stakeholders affected by the alleged discriminatory hiring practices at this stage of the project lifecycle. [Business and Human Rights Resource Centre, "Total Energies responded", 06/10/2023: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not Met: Identified cause</li> <li>• Not Met: Identified and implemented improvements</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
M(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Remedy satisfactory to stakeholders</li> </ul>

#### 4. Low-Carbon Transition Assessment (20% of total)

Indicator Code	Indicator name	Score (%)	Explanation
n/a	Emissions targets	25%	<ol style="list-style-type: none"> <li>1. Has the Company set and disclosed a Scope 1+2 short term target? Yes. "TotalEnergies reaffirms its objective to reduce emissions from its operated assets, which aims to reduce its net Scope 1+2 emissions(3) by 40% by 2030 relative to 2015, after mobilizing around 5 million credits from nature-based carbon sinks projects." [Source: <a href="https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf">https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</a>, p. 181]</li> <li>2. Has the Company set and disclosed a Scope 1+2 long term target set? No, without evidence</li> <li>3. Is the Scope 1+2 short term target aligned with a net zero emissions scenario? No, it does not reach the 60% by 2030 requirement.</li> <li>4. Is the Scope 1+2 long term target aligned with a net zero emissions scenario? No, without evidence</li> <li>5. Has the Company set and disclosed a Scope 3 short term target? Yes. "Scope 3 (Category 11)(c) Mt CO2e 2030 &lt;400." [Source: <a href="https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf">https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</a>, p. 20] from 410 Mt CO2e in 2015.</li> <li>6. Has the Company set and disclosed a Scope 3 long term target? No, without evidence. The Company states 'In this respect, setting objectives to drastically reduce TotalEnergies' global indirect emissions (Scope 3) 1 in absolute value, without an evolution of the overall structure of energy demand, is in reality not relevant to reduce global GHG emissions.' [Source : <a href="https://totalenergies.com/system/files?file=documents/totalenergies_sustainability-climate-2025-progress-report_2025_en.pdf">https://totalenergies.com/system/files?file=documents/totalenergies_sustainability-climate-2025-progress-report_2025_en.pdf</a>, p. 61]</li> <li>7. Is the Scope 3 short term target aligned with a net zero emissions scenario? No, see above.</li> <li>8. Is the Scope 3 long term target aligned with a net zero emissions scenario? No, without evidence</li> </ol>
n/a	Share of Low Carbon CAPEX	16%	CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.) 3,043. CapEx (M\$) Total activities (A+B) 19,585. [Source: <a href="https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf">https://totalenergies.com/system/files/documents/totalenergies_universal-registration-document-2024_2025_en.pdf</a> , p. 361]
Final score		21%	

#### 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 dates\* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

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 2025 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 project developers 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.

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\* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.