

## **Lobbying Ethics Charter of Total S.A.**

This Charter applies to all entities and subsidiaries held by the Group, in accordance with their respective decision-making rules.

### Context:

Total S.A. is a major player on the international scene, operating in over one hundred and thirty countries and employing close to one hundred thousand people, from a wide range of origins and professions. The company today has to interact not only with the various representatives of the economic world but also with the local populations in the areas in which it is established and with the public authorities as well. In this capacity, the company plays an active role in the public debate.

Aware of its responsibility in all the countries in which it operates, Total S.A. bases its lobbying activities on the values defined in its Code of Conduct, which clearly affirms its ethical commitment. By lobbying, the Group means all activities conducted directly or indirectly with public officials and authorities, and more generally with all stakeholders concerned by the Group's activities, in order to express its challenges, explain its issues and promote its interests. The Group's lobbying activities are carried out in accordance with this Lobbying Ethics Charter of Total S.A.

This Charter applies to all the Group's employees who carry out lobbying activities, particularly within the Public Affairs Division, which is attached to the General Secretariat. At the Group level, this division provides the link between the Group and its institutional stakeholders: administrations, elected representatives, large international organizations and NGOs. It works in conjunction with the Group representatives located in countries where Total S.A. has one or more subsidiaries. The latter are regularly informed of the Group's positions on the issues concerning them, particularly through the Internal News Agency 1.

The role of employees who carry out lobbying activities is to put forth, in the company's spheres of activity, an expertise and a point of view on the development of the regulatory or legal framework within which the Group operates both in France and abroad, as well as to promote the Group's business. The aim is to inform the public authorities and interested stakeholders of the context and consequences of their decisions on the Group's activities and, on a broader level, on the energy sector.

These lobbying activities apply not only to institutional players but to all stakeholders concerned by the activities of Total S.A. Lobbying includes communication actions and awareness campaigns on the Group's challenges, in order to instill an understanding of its activities and develop Total S.A.'s acceptability to all stakeholders. This is not only about promoting the Group's image, but also about facilitating the development of its business in France and overseas.

This Lobbying Ethics Charter is widely distributed within the Group and published on the website of Total S.A.

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1 Communication tools for the Group's spokespersons on topical issues relating to the company

Commitments:

➤ **The Group undertakes to:**

- Reject and combat corruption in all forms, whether public or private, active or passive, direct or indirect. Within its area of activity, Total S.A. undertakes to promote best practices with regard to transparency and the fight against corruption;
- Refuse to intervene in the functioning or funding of the political arena in the countries in which it operates;
- Respect the principle of free competition;
- Convey messages to the authorities that are consistent with its stated positions and strategies and be transparent concerning such messages, whether they are affirmative or critical;
- Publish the names of the professional organizations and associations to which it belongs, on its website;
- Ensure that the positions stated publicly by Total S.A. are consistent with those promoted through its lobbying effort, either directly or indirectly through professional organizations or associations. If at any time, on any given topic, the positions stated publicly by Total S.A. differ from those advocated by any professional organization or association to which it belongs, the position stated by Total S.A. will prevail;
- Within its area of expertise, provide public officials and authorities with appropriate assessments based on reliable information.

➤ **During their lobbying activities, employees must:**

- Respect the applicable laws and regulations in the countries in which they operate, as well as the relevant industry's best practices;
- Respect the Code of Conduct, the present Charter and all the Group's Anti-Corruption Compliance rules and more specifically those relating to invitations and gifts which require, over a certain amount, the prior agreement of superiors;
- Join any lobbying registers that may exist in the institutions in which they carry out their lobbying activities;
- Clearly indicate to stakeholders that the lobbying action is being conducted on behalf of Total S.A.;
- Provide information and contributions that comply with the Group's values without leading public officials and authorities to expect any form of payment;
- Act to defend the legitimate interests of the Group, while ensuring the soundness of their actions and without trying to obtain undue interest;
- Show their integrity and intellectual probity in dealings with public officials and authorities, and protect the confidentiality of any information these may provide;
- Respect the freedom of decision, judgment and opinion of holders of public office;
- Ensure that any contract entered into with third parties involving lobbying activities on behalf of Total S.A. includes an anti-corruption clause and a clause indicating acceptance of this Charter.



**Patrick Fouyanné**

Chairman & Chief Executive Officer