



TotalEnergies

United Kingdom

TotalEnergies Marketing UK Limited

Marketing and Services

MODERN SLAVERY STATEMENT FOR 2025

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by TotalEnergies Marketing UK Limited, to prevent modern slavery and human trafficking in its business and supply chains for the financial year ended 31 December 2025.

Introduction

TotalEnergies Marketing UK Limited has operated in the United Kingdom for more than 65 years. Its activities include the manufacture, marketing and distribution of petroleum products and related services. TotalEnergies Marketing UK Limited is ultimately wholly owned by TotalEnergies SE, together with its subsidiaries, "TotalEnergies", a global multi-energy company employing more than 100,000 people in more than 130 countries. TotalEnergies SE's shares are listed on Euronext Paris and the New York Stock Exchange.

TotalEnergies expects all business activities to be conducted to high ethical and professional standards. Group policies, guidance, governance processes and training support compliance with those standards, including respect for human rights and the prevention of forced labour, child labour and human trafficking. TotalEnergies reports on non-financial performance, including actions relating to human rights, in its Universal Registration Document 2025 and in its Human Rights Briefing Paper 2018–2023.

TotalEnergies' Human Rights Guide identifies the prevention of child labour and forced labour, respect for workers' rights and non-discrimination as core business principles. These principles inform the way TotalEnergies Marketing UK Limited manages its own activities and engages with suppliers.

TotalEnergies Marketing UK Limited is committed to preventing modern slavery and human trafficking in its operations and supply chains. We expect suppliers and business partners to maintain ethical business practices, comply with applicable labour laws and uphold standards equivalent to TotalEnergies' human rights commitments.

During 2025, TotalEnergies Marketing UK Limited continued to strengthen its approach by focusing on risk identification, supplier due diligence, training and awareness, and follow-up of identified risks.

This statement summarises the actions taken during the financial year ended 31 December 2025.

Implementing our Commitment

TotalEnergies Marketing UK Limited implements its commitment through four connected areas: policies, governance and reporting processes, supply chain due diligence and training. This approach reflects the reporting areas commonly expected under section 54 of the Modern Slavery Act 2015, including organisational structure, policies, due diligence, risk assessment, effectiveness and training.

1. Policies

Group directives, policies and guidance apply to employees and support consistent standards across TotalEnergies. These documents reflect relevant international human rights standards and are adopted locally by affiliates, including TotalEnergies Marketing UK Limited, to promote a consistent approach to preventing modern slavery and protecting human rights.

The principal policies and guidance documents are summarised below.

2. Governance and processes

TotalEnergies Marketing UK Limited

Registered Office: 10 Upper Bank Street (19th floor), Canary Wharf, London E14 5BF, UK - Registered in England No.546167
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TotalEnergies' Ethics Committee oversees the implementation of the Code of Conduct, provides guidance on compliance and reviews concerns relating to alleged breaches, including human rights matters. The Chair of the Ethics Committee reports to the Chief Executive Officer and regularly to TotalEnergies' Executive Committee and to the Governance and Ethics Committee of the Board of Directors.

At affiliate level, TotalEnergies Marketing UK Limited has access to ethics, compliance and integrity reporting channels that support the promotion and application of the Code of Conduct.

Human Rights Officers and local points of contact support the identification, escalation and management of human rights risks, including modern slavery risks. They also help cascade relevant guidance and training across the organisation.

Employees are encouraged to speak up and report any suspected breach of the Code of Conduct, including concerns relating to human rights, forced labour, child labour or human trafficking.

3. Supply chain due diligence

TotalEnergies Marketing UK Limited engages suppliers of goods and services in the UK and overseas. Most goods and services are sourced from UK registered companies and support manufacturing, marketing, logistics and operational activities.

The Code of Conduct requires suppliers to comply with TotalEnergies' Fundamental Principles of Purchasing and to promote equivalent standards in their own supply chains. Particular attention is given to human rights, working conditions and compliance with labour standards.

Supplier contracts require compliance with TotalEnergies' Fundamental Principles of Purchasing, including commitments on respect for human rights at work. Serious breaches may lead to corrective action, escalation or termination of the contractual relationship.

4. Training

Corporate and affiliate-level regular training helps employees and contractors understand the Code of Conduct, relevant policies and their individual responsibilities to respect human rights. TotalEnergies Marketing UK Limited provides additional awareness activity on modern slavery risks and the practical steps required to identify, prevent and escalate concerns.

Our Policies and Processes

The key policies and processes used by TotalEnergies Marketing UK Limited to identify and manage modern slavery risks are set out below.

- **Code of Conduct:** Respect for human rights is a core principle for all employees. The Code of Conduct aligns with internationally recognised standards, including:
 1. The OECD Guidelines for Multinational Enterprises.
 2. The United Nations Global Compact.
 3. The Universal Declaration of Human Rights
 4. The UN Guiding Principles on Business and Human Rights
 5. The Fundamental Conventions of the ILO.
 6. The Voluntary Principles on Security and Human Rights.

The Code of Conduct is available in 19 languages and is promoted through communications, training and awareness activity.

- **Human Rights Guide:** This guide supplements the Code of Conduct and supports due diligence by explaining TotalEnergies' human rights commitments and expectations.
- **Business Integrity Guide:** This guide provides practical guidance on matters addressed by the Code of Conduct, including ethical decision-making and escalation of concerns.
- **Fundamental Principles of Purchasing:** Suppliers are required to comply with these principles, including requirements relating to human rights, labour standards, health, safety, environment and anti-corruption. The Fundamental Principles of Purchasing require suppliers to respect human rights at work and comply with applicable international standards.

TotalEnergies Marketing UK Limited works with suppliers to support compliance and improve working conditions where risks or gaps are identified. Serious or unresolved violations of the Fundamental Principles of Purchasing may result in contract termination.

- **Recruitment and agency workers:** TotalEnergies Marketing UK Limited uses internal recruitment teams and selected employment agencies. New agencies are assessed before workers are accepted, including consideration of their recruitment and labour practices.
- **Reporting and audit:** The Code of Conduct encourages employees to speak up and report concerns, including any actual or suspected breach of human rights standards. Employees may report concerns to their manager, Human Resources, the Ethics and Compliance Officer, the Human Rights Officer, the local Integrity Committee or the corporate Ethics Committee. Confidential reporting channels are also available.

Employees of suppliers and other external stakeholders may also raise questions, or report concerns to TotalEnergies' Ethics Committee. Suppliers and internal purchasers may contact the internal supplier mediator where appropriate.

TotalEnergies conducts internal ethics evaluations and human rights assessments of affiliates, including TotalEnergies Marketing UK Limited, to assess compliance with the Code of Conduct and identify areas for improvement.

- **External engagement:** TotalEnergies is party to a global agreement with IndustriALL Global Union. The agreement provides a framework for social, environmental and corporate responsibility commitments, including human rights, workplace safety, employee dialogue and diversity. A review committee made up of TotalEnergies and trade union representatives meets annually to assess implementation and identify improvement actions.
- TotalEnergies participates in external initiatives, including the United Nations Global Compact action platform on Decent Work in Global Supply Chains, to support continuous improvement in labour standards and supply chain due diligence.
- TotalEnergies is an active member of IPIECA's Supply Chain Working Group and contributes to work focused on the UN Guiding Principles on Business and Human Rights.

Supply Chain: Due Diligence

TotalEnergies Marketing UK Limited seeks to prevent illegal, forced or exploitative labour through supplier engagement, contractual requirements, due diligence questionnaires, audits and assessments. These controls are designed to confirm that suppliers' workforces are appropriately trained, lawfully employed and managed in compliance with applicable labour laws.

Suppliers identified as higher risk may be required to complete due diligence questionnaires covering compliance with TotalEnergies policies, the Modern Slavery Act 2015 and international labour standards. At Company level, TotalEnergies uses third-party social and labour rights audits for priority suppliers. The audit programme is reviewed regularly to strengthen its effectiveness in identifying and addressing forced labour, child labour and other human rights risks.

Highlighted Actions Taken in 2025

In 2025, TotalEnergies Marketing UK Limited continued to apply the Fundamental Principles of Purchasing and to focus on respect for human rights at work. This included attention to working conditions, remuneration, worker dignity and alignment with the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization.

In December 2025, TotalEnergies Marketing UK Limited participated in TotalEnergies' annual Business Ethics Day, which centred on celebrating 25 years of the Code of Conduct. The company as a whole was reminded of the importance of understanding and owning the Code, considering ethical decision-making scenarios, and supporting the "Speak Up" culture.

The supplier audit framework continues to cover labour and human rights issues, including child labour, forced labour, discrimination, freedom of association, collective bargaining, working conditions, working hours and health and safety. Audits carried out by independent third parties include on-site visits, document reviews and worker interviews.

TotalEnergies Marketing UK Limited continues to improve its awareness of, and response to, modern slavery risks. Key actions in 2025 and planned follow-up in 2026 include:

- Maintaining progress to map and assess modern slavery and human rights risks through the contracts and procurement function, with further review activity planned for 2026.
- Maintaining mandatory training for employees and contractors on the Code of Conduct, business ethics, anti-corruption and Human Rights at Work.
- Continuing to promote the digital Code of Conduct booklet and monitor awareness of the Code among personnel.
- Using due diligence third-party assessment supplier tool, SEQUANA, to embed supply chain due diligence checks, including checks relating to modern slavery prevention and human rights protection.
- Considering the development of refresher training focused on third-party due diligence and the identification, prevention and escalation of modern slavery risks.

Approval

This statement has been approved by the Board of Directors of TotalEnergies Marketing UK Limited.

The Board has authorised a Director, Stephane Pastor, to sign the statement.

Signed by Stephane Pastor

Signed by:

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Managing Director

26th June 2026

July 8, 2026 | 11:00 AM CEST

For and on behalf of

TotalEnergies Marketing UK Limited