

TECHNIPFMC 2022 ACCOUNT ON HUMAN RIGHTS DUE DILIGENCE

TechnipFMC plc, a public limited company incorporated and organized under the laws of England and Wales, with registered number 09909709, and with registered office at Hadrian House, Wincomblee Road, Newcastle upon Tyne, NE6 3PL, United Kingdom (“TechnipFMC,” the “Company,” “we,” or “our”) is a global leader in the energy industry, delivering projects, products, technologies, and services. With our proprietary technologies and production systems, integrated expertise, and comprehensive solutions, we are transforming our customers’ project economics. We have operational headquarters in Houston, Texas, United States, and we currently operate across two business segments: Subsea and Surface Technologies.

While we have a number of entities registered in Norway and subject to the Transparency Act,¹ our supply chain is global in nature, and all TechnipFMC entities are subject to the Company’s global policies and procedures.

Subsea

We are driving change in subsea energy production by safely providing innovative technologies and integrated solutions that improve economics, enhance performance, and reduce emissions. As a fully integrated technology and services provider, we continue to drive responsible energy development.

Our Subsea segment provides integrated design, engineering, procurement, manufacturing, fabrication, installation, and life of field services for subsea systems, subsea field infrastructure, and subsea pipeline systems used in oil and gas production and transportation.

We are an industry leader in front end engineering and design (“FEED”); subsea production systems (“SPS”); subsea umbilicals, risers, and flowlines (“SURF”); and subsea robotics. We also have the capability to install these products and related subsea infrastructure using our fleet of highly specialized vessels. By integrating the SPS and SURF work scopes, we are able to drive greater value to our clients through more efficient field layout and execution of the installation campaign.

Surface Technologies

The Surface Technologies segment designs, manufactures, and services products and systems used by companies involved in land and shallow-water exploration and production of crude oil and natural gas, as well as specialized equipment supporting carbon transportation and storage, hydrogen storage, and geothermal. Our Surface Technologies product families include drilling, stimulation, production, measurement, digital, and services. We manufacture most of our products internally in facilities located worldwide.

¹ AGAT Technology AS, Deep Purple AS, FMC Kongsberg Subsea AS, Techdof Brasil AS, Technip Chartering Norge AS, Technip Coflexip Norge AS, Technip Norge AS, Technip-Deepocean PRS JV DA, TIOS AS, and TIOS Crewing AS (collectively, the “Applicable Entities”).

We are uniquely positioned to deliver greater efficiency across project life cycles, from concept to project delivery and beyond. Through innovative technologies and improved efficiencies, our offering unlocks new possibilities for our customers in developing energy resources to meet the Energy Transition.

Enhancing our performance and competitiveness is a key component of our strategy, which is achieved through technology and innovation differentiation, seamless execution, and simplification to drive costs down. We are targeting profitable and sustainable growth by seizing market growth opportunities and expanding our range of services, including opportunities arising through the Energy Transition. We are managing our assets efficiently to ensure we are well-prepared to drive and benefit from new opportunities in the markets we serve.

Each of our more than 20,000 employees is driven by a steady commitment to clients and a culture of project execution, purposeful innovation, challenging industry conventions, and rethinking how the best results are achieved. This leads to fresh thinking, streamlined decisions, and smarter results, enabling us to achieve our vision of enhancing the performance of the world's energy industry.

The Company and the Applicable Entities offer this report pursuant to our obligation under Section 5 of Norway's act relating to enterprises' transparency and work on fundamental human rights and decent working conditions.

ESG Governance

All Board members participate in oversight of ESG matters. Oversight is concentrated in the Environmental, Social, and Governance Committee, which, as set forth in its charter, has principal responsibility of overseeing ESG matters. These areas of oversight include:

- » Environmental stewardship, responsible investment, corporate citizenship, human rights, and ESG risk management;
- » Reviewing and monitoring the development and implementation of targets, standards, metrics, or methodologies to track the Company's ESG performance; and
- » Reviewing the Company's engagement with shareholders and public disclosures with respect to ESG matters.

In addition to oversight by the ESG Committee, the Audit and Compensation and Talent Committees also oversee certain ESG matters that align with their areas of oversight.



TechnipFMC's Executive Leadership Team sets the overall direction and approach toward our ESG efforts. The ESG Steering Committee, composed of members of the executive leadership team directly responsible for various aspects of the ESG program, is responsible for the specific Company initiatives toward corporate responsibility and sustainability and actions to further those initiatives. The ESG Steering Committee is responsible for setting the direction and long-term strategy to achieve our ESG-related plans, the development and implementation of targets, standards, and metrics, or methodologies to achieve our ESG goals, and publication of our external communication on ESG topics. The ESG Steering Committee regularly receives updates and provides guidance to subject-matter experts in each of the ESG pillars that coordinate activity across the Company that underpins our ESG strategy.

As a multinational organization with a global supply chain, TechnipFMC evaluates risks around human rights and decent working conditions on a global basis. Hence, we take a risk-based approach that includes geography as a factor, rather than the focus, as is further explained in this account.

UNGC

TechnipFMC supports the Ten Principles of the United Nations ("UN") Global Compact. We integrate the UN Global Compact's ten principles in the areas of Human Rights, Labor, Environment, and Anti-Corruption into our business strategy, culture, and daily operations.

The UN Global Compact is also a call for action to achieve its 17 Sustainable Development Goals ("SDGs"). These societal goals are at the heart of the UN's 2030 Agenda for Sustainable Development and are aimed at ending poverty, protecting the planet, and

ensuring that all people enjoy peace and prosperity by 2030. At TechnipFMC, our targets are designed to align with the UN SDGs for which we believe we can achieve the greatest positive impact, given their relevance to our business and sustainability strategy. The application of these SDGs throughout this section are identified by the SDG icon labels.

TechnipFMC is taking greater environmental responsibility, positioning ourselves as leaders, and playing our part in the journey to a net zero-carbon society by disclosing clear, comparable, and consistent information, including in our Scorecard, about the risks and opportunities presented by climate change. We continue to proactively optimize our processes, particularly around risk management and measuring strategy resilience in line with our Company Core Values and Foundational Beliefs and regulatory requirements.

Building Responsibly

TechnipFMC is also a member of Building Responsibly, an industry-led organization that affords member companies the opportunity to collaborate and benchmark with industry counterparts on development of common objectives, standards, and processes for achieving human rights compliance. In particular, our Human Rights Standard codifies the Worker Welfare Principles that have been developed and adopted by this group and TechnipFMC has worked closely with the industry members to develop "Guidance Notes" that offer practical tools for managing a corporate human rights program.

Human Rights at TechnipFMC

At TechnipFMC, "respect" is one of our Foundational Beliefs. We believe that every person is entitled to honest, fair, and humane treatment. We do not tolerate any form of modern slavery, including the use of forced labor, child labor, or any type of human trafficking.

We implement processes to ensure the health, safety, and welfare of our personnel and to improve the status of others. We develop human rights policies and procedures, provide training and awareness, conduct supplier due diligence and audits, collaborate with industry counterparts on benchmarking, and track relevant global legislation.

The Company's Code of Business Conduct (the "Code"), which applies to all directors, officers, employees, and anyone who represents TechnipFMC or acts on our behalf, reflects our commitment to acting ethically and lawfully and recognizing human rights on a global basis.

It is our policy that our Code be shared and discussed with clients, suppliers, and business partners to better explain our rules of conduct and reinforce our culture of accountability. Further, employees and third parties are encouraged to report suspected breaches of our Code through various means, including through our anonymous reporting hotline. We maintain a zero-tolerance policy on retaliation against employees for reporting suspected violations.

Our Code requires adherence to the following principles, amongst others:

- » Treat people with dignity and respect.
- » Act without discrimination or prejudice.

- » Create an environment that is free from harassment.
- » Ensure that our business partners and suppliers do not engage in inappropriate labor practices, including forced labor or illicit forms of child labor.
- » Promote equality in the workplace with salaries based on merit.
- » Cooperate with regular inspections and audits to verify that our values are implemented throughout the Company.

TechnipFMC has published its statement on slavery and human trafficking for the financial year ending December 31, 2022, in accordance with section 54 of the U.K. Modern Slavery Act 2015. This document is available on our website at www.technipfmc.com under the heading “About us > Ethics and Compliance > Slavery and Human Trafficking Statement 2022.”

TechnipFMC endeavors to ensure compliance with human rights regulations and principles within the scope of our operations and in accordance with the following international human rights regulations and principles:

- » The United Nations Guiding Principles on Business and Human Rights
- » The 1948 Universal Declaration of Human Rights
- » The International Labour Organization’s Fundamental Conventions

We maintain a Human Rights Standard (the “Standard”) setting forth recognized human rights principles so that our operations are executed in compliance with the same and so that everyone with whom we work is treated with respect and dignity. Our Standard codifies the Worker Welfare Principles developed by Building Responsibly.

Our General Terms & Conditions set forth our requirements and expectations regarding our contractors, subcontractors, vendors, and other suppliers’ respect for human rights and decent working conditions.

TechnipFMC also maintains its Supplier and Subcontractor Integrity Expectations, a supplier code of ethics that sets expectations for third parties who perform work for TechnipFMC to adhere to internationally recognized human rights standards.

We continue working on our human rights strategy to embed respect for human rights and decent working conditions in our operations and business relationships and to promote the protection of human rights for our employees in the workplace and across our supply chain as a foundational business practice.

We have created an internal Human Rights Working Group, bringing together our support functions and operations to foster and promote a better working environment for our employees and our suppliers. The group conducted an internal human rights risk assessment to assess our processes against international standards, Building Responsibly principles, and our clients’ human rights expectations. The assessment also looked at the standardization of our processes across the company and at our human rights expectations toward our suppliers.

We continue to assess how our company-wide due diligence processes and monitoring processes could be reinforced in this area.

Identifying Adverse Impacts on Fundamental Human Rights & Decent Working Conditions

A key part of TechnipFMC's human rights program is risk-based due diligence that is implemented to identify, prevent, and mitigate potential adverse impacts on the communities in which we operate. The risk of modern slavery and human trafficking occurring in connection with our business or supply chains depends on the nature of our activities and the countries in which we operate. We recognize that certain of the sectors and jurisdictions in which we operate present greater potential risks of slavery and human trafficking. We are aware that our commitment to ethical business practice requires concerted and on-going effort to better understand and respond to those risks.

Our risks include:

- » Operating in geographical areas that present human rights risks;
- » Reliance on a multi-tiered, global supply chain that includes suppliers with high-risk scopes of activities;
- » Involvement of a variety of worker demographics (including differing workforce skill levels, use of recruitment agencies, and the potential engagement of migrant workers); and
- » Operating global projects with subcontracting relationships, which could result in a lack of visibility into subcontractors' practices to ensure worker welfare.

When assessing the company's potential risks with respect to human rights, we take all of these factors into account and rely on international standards and industry best practices to define the specific risks, and to develop associated policies and procedures. We conduct these risk assessments on an annual basis to assist us in determining key areas of focus and where best to deploy resources for training, supplier engagement, and on-site audits.

Supply Chain & Supplier Due Diligence

One of our major priorities is to continue enhancing our supplier diligence processes to achieve increased transparency into our supply chain, and to ensure worker welfare compliance. TechnipFMC currently has approximately 5,000 direct suppliers across the globe. We aim to develop business relationships with like-minded subcontractors, suppliers, and business partners and aspire to only do business with counterparties who respect human rights and uphold labor laws.

As noted above, it is our policy that our Code be shared and discussed with clients, suppliers, and our business partners to better explain our rules of conduct and reinforce our culture of accountability. Further, our suppliers are required to accept and abide by contractual provisions addressing compliance with a range of ethical issues, including

human rights requirements. There are specific commitments, which in some instances refer to the International Labour Organization (“ILO”) Conventions, that prohibit forced labor and child labor. We believe responsible sourcing is an important part of our sustainability program; hence we operate a due diligence program pursuant to the U.S. Dodd-Frank Act regarding conflict minerals and other initiatives aimed at improving transparency throughout our supply chain.

Our suppliers are also subject to due diligence reviews that investigate compliance with labor laws and ethical treatment of workers. In particular, we have updated our Supplier Qualification Standards to require human rights risk assessments for all new suppliers and subcontractors. In addition, for existing suppliers, TechnipFMC conducted a major Human Rights compliance review, including an initial risk assessment, issuance of Self-Assessment Questionnaires (“SAQs”), enhanced due diligence reviews for those suppliers, desk audits for selected suppliers, and on-site audits of high-risk suppliers. In 2021, we issued SAQs and conducted Level 1 due diligence reviews on our 100 highest-risk suppliers. In 2022, based upon these results, TechnipFMC completed an additional 62 Level 2 desk audits and 21 Level 3 on-site audits. This activity resulted in suppliers implementing Corrective Actions Plans (where needed) and making improvements to worker welfare policies and practices. In 2022, we also initiated an annual review process, whereby additional suppliers are selected each year for enhanced due diligence reviews, based on risk factors. In addition, we are developing a “dashboard” that will offer useful risk metrics and status updates with respect to our supply base that has been selected for due diligence reviews. All of these efforts are measured as part of our ESG Scorecard, which ties our activities to compensation.

These supplier human rights reviews cover areas relating to: (1) policies and procedures relating to employment of children and young workers and prohibition of slavery; (2) freedom of association; (3) contract requirements for employees, suppliers and customers; (4) fair wages and working conditions; (5) non-discrimination policies; (6) safe, healthy and secure workplaces and environments; (7) fair compensation; (8) freedom of assembly; (9) grievance mechanisms; (10) incident reporting and investigations; (11) training; (12) supplier outreach; and (13) due diligence of new and existing suppliers. These categories align with industry standard benchmarks and human rights practices.

Going forward, we will continue to refine our risk assessments and audit processes as we gain further insight through these due diligence reviews and will further evaluate ways in which we can improve our overall Human Rights program.

Program Data: Potential Adverse Impacts

For the period covering this account, TechnipFMC identified the potential for adverse impacts such as payment of recruitment costs, provision of unsuitable living and sleeping accommodations, employment of underaged workers, improper wages, and restricted access to identifying documentation.

Stopping or Mitigating Adverse Impacts on Fundamental Human Rights & Decent Working Conditions

Protection of human rights is an essential business principle that we promote for our employees in the workplace and across our supply chain. We aim to develop business relationships with like-minded subcontractors, suppliers, and business partners who are guided by a similar set of principles of business conduct.

Internal Education

Employee training is an essential component of communicating and embedding our commitment to prevent modern slavery and human trafficking within our business. We have implemented training for all employees on our Code, including the sections addressing human rights and labor welfare. In addition, we are developing a suite of updated training videos that will be provided to all employees.

TechnipFMC has also engaged in a variety of initiatives to raise awareness of human rights concerns at our Company, including development of “Human Rights Take 5 Moments” that are used as refresher topics at the start of meetings and holding “Human Rights Experts Explain” Teams Live events (each of which were attended broadly across the company).

Our human rights compliance team also conducts periodic, ad hoc trainings on human rights to the Company’s internal stakeholders. For instance, in the Fall of 2022, our human rights compliance team conducted a series of human rights training sessions in six of its European offices over the course of two weeks. Additionally, in the Spring of 2023, our human rights compliance team engaged in informational meetings in Norway and the United Kingdom to collaborate on program developments and to answer questions regarding our human rights commitments and ongoing activities.

TechnipFMC takes its Human Rights Program very seriously and endeavors to raise awareness continuously across the company.

External Education

We strive to educate and collaborate with a variety of external stakeholders in the TechnipFMC ecosystem.

In April 2023, TechnipFMC, in partnership with the non-profit organization Truckers Against Trafficking, hosted the industry summit, ‘Combating Human Trafficking–How the Energy Industry Can Make a Difference,’ where 50 representatives from 15 energy companies, four trucking/logistics companies, and five law enforcement agencies gathered to learn about human trafficking in the community, discuss engagement strategies for energy companies, and devise shared strategies to combat human trafficking.

TechnipFMC also conducts supplier outreach via its regional Supplier Quality Days. During these events, TechnipFMC hosts key suppliers in the region to discuss important topics, including human rights. Over the period covering this account, TechnipFMC has hosted these events in the United States, Brazil, and Poland.

TechnipFMC is also, as set out above with respect to our ESG governance, a member of the UN Global Compact and an active participant in the industry group Building Responsibly. TechnipFMC is focused on leveraging those relationships with industry stakeholders to align on and standardize human rights efforts and initiatives across the industry.

TechnipFMC also routinely provides human rights training to its suppliers as part of the Corrective Action process.

Corrective Action Plans

Corrective Action Plans that are tailored to individual circumstances are implemented. A Corrective Action Plan may include discussions and commitments to remediate the questionable behavior. While TechnipFMC aims to work alongside its suppliers to improve the standard of human rights in the TechnipFMC ecosystem, TechnipFMC will reevaluate its business relationship with any supplier that refuses to participate in a supplier audit or declines to implement sufficient remedial action as the result of a supplier audit.

Program Data: Actual Adverse Impacts

For the period covering this account, TechnipFMC identified the following instances of actual adverse impacts relevant to our Norwegian supply chain:

- » An Italian supplier of third-party inspection services was found to lack a grievance mechanism for its employees. TechnipFMC is currently implementing corrective actions for this supplier.
- » An Italian supplier of engineered flanged products was found to lack a grievance mechanism for its employees. With TechnipFMC's support, this supplier set up a grievance mechanism in accordance with international standards. Additionally, TechnipFMC conducted a session to train the supplier's key employees on the importance of human rights.