

Whistleblower Policy

T.EN

TECHNIP
ENERGIES



CONTENTS

1. Introduction	1
2. Who can report?	1
3. Which concerns are covered by this reporting Policy?	1
4. Can I ask someone for advice?	1
5. Who should I report to?	2
6. How can I report?	2
7. Can I remain anonymous?	2
8. What happens after I report a concern?	2
9. Will reports be treated confidentially?	3
10. How will I be protected if I report a concern?	3
11. Can I report concerns outside the company?	4
12. Privacy	4
13. Policy effectiveness and Amendment	4

1. Introduction

- 1.1. Technip Energies (the “**Company**”) is committed to conducting business in compliance with applicable laws and regulations as well as the Company’s internal requirements (which include our Code of Business Conduct, our policies, our standards, and related procedures) (the “**Legal and Ethical Requirements**”). The Company has decided to put in place this Whistleblower Policy (“**Policy**”) to be made aware of all possible violations and take the appropriate remedial actions.
- 1.2. This Policy is intended to encourage every employee, officer, contractor of the Company or any third party to report any suspected misconduct or irregularity which the Company or any person acting for and on behalf of the Company may be responsible for. This Policy sets out what and how matters should be reported, the procedure that is followed once a report has been made, and how employees reporting concerns are protected from retaliation from the Company or any person acting for and on behalf of the Company.

2. Who can report?

Under this Policy, (a) persons who work for or act for and on behalf the Company (b) shareholders of the Company, (c) persons belonging to the board of directors (“**Board**”) of the Company, and (d) third parties (“**Reporting Persons**”) may report any suspected misconduct or irregularity to the Company.

3. Which concerns are covered by this reporting Policy?

- 3.1. This Policy applies to the reporting of deviations from the Legal and Ethical Requirements which are actual or anticipated and for which the Company or any individual working for the Company is or could be responsible for (“**Deviations**”). Deviations may relate, in particular but without being limited, to the following matters:
 - (a) a possible violation of the law, which may or may not have criminal implications;
 - (b) a violation of the Company’s internal requirements;
 - (c) threats to the environment;
 - (d) giving or receiving a bribe;
 - (e) an aspect of the firm’s operations or premises which may endanger someone’s health or safety;
 - (f) the apparent ill-health of anyone working for the Company affecting his or her work or behavior;
 - (g) drug or alcohol abuse;
 - (h) disclosure of confidential information;
 - (i) dishonesty or unethical behavior (e.g., lying to a client or a governmental authority);
 - (j) protection of privacy and personal data, and security of network and information systems;
 - (k) an (other) act or omission involving the public interest in case of:
 - a violation, or risk of violation, of a legal regulation or internal rules that constitute a concrete obligation, which are established by an employer pursuant to a legal regulation; or
 - threats to public health, the safety of individuals, the environment or the proper functioning of a public service or a company because of improper actions.
- 3.2. The above list of examples of Deviations is for reference purposes only and Reporting Persons may raise concerns even if a Deviation is not expressly listed.
- 3.3. Reports of a Deviation should be made in good faith and, where possible, supported by relevant factual information. A report is submitted in good faith if the Reporting Person had reasonable grounds to believe and in good faith did believe that the information on the Deviation was true at the time of reporting. A Reporting Person does not need to be certain that Deviation has taken place or will take place to report it.

4. Can I ask someone for advice?

- 4.1. Reporting Persons may consult the Company’s confidential advisor (“**Confidential Advisor**”) about suspicions of possible Misconduct. A Reporting Person can discuss his or her concerns with the Confidential Advisor in confidence.
- 4.2. The contact details for the Ethical & Compliance team can be found on the Technip Energies’ intranet.

5. Who should I report to?

Reporting Persons are encouraged to first report matters to their manager. However, if for any reason, given the circumstances, reporting to manager of the Reporting Persons is not appropriate, Reporting Persons can report concerns to other managers in the organization (the “**Reporting Officer**”) or through a reporting hotline (<http://technipenergies.ethicspoint.com/>) (“**EthicsPoint**”) which is operated by a third party provider separate from the Company (in a completely secure and confidential manner).

6. How can I report?

Reporting Persons may report matters in writing or orally, including through the dedicated EthicsPoint website or telephone line. Reporting Persons may also request an in-person meeting with the Reporting Officer, during which they can report any Deviation. The Reporting Officer will schedule such a meeting within a reasonable time. The contact details of the Reporting Officer and the chair of the Board can be found on the Technip Energies’ intranet site.

7. Can I remain anonymous?

- 7.1. The Company encourages an open culture and emphasizes the importance of Reporting Persons raising concerns openly to assess, investigate and gather additional information, if required. However, if a Reporting Person does not want to raise a concern openly and wishes to remain anonymous, the Company will use all reasonable efforts to ensure the Reporting Person’s anonymity (unless the Company is required to comply with a competing legal or regulatory obligation).
- 7.2. Reporting Persons may also report anonymously using the dedicated reporting hotline (<http://technipenergies.ethicspoint.com/>) or by reporting directly to the Reporting Officer.

8. What happens after I report a concern?

- 8.1. The Company takes every report of possible Deviation seriously. After submitting a report, the Reporting Person receives a confirmation of receipt of the report within five (5) business days.
- 8.2. The Head of Allegations and Investigations Program will carry out (or will designate someone to carry out) an initial assessment to determine how the report should be followed up, and, where appropriate, investigated.
- 8.3. Within three (3) months after sending the confirmation of receipt of the report, the Company will provide information to the Reporting Person as to any follow-up to the report. Specifically, the Company will give the Reporting Person an indication that the report has been investigated, the timeframe of such investigation and, where appropriate, any actions taken in response. However, the need for confidentiality and privacy and other considerations may prevent the Company from being able to give the Reporting Person specific details regarding the investigation or any remedial and disciplinary action taken as a result. Any information shared with the Reporting Person about the investigation and action taken must be treated as confidential.
- 8.4. The Company cannot guarantee the outcome expected or desired by the Reporting Person.

9. Will reports be treated confidentially?

- 9.1. The Company will treat any report confidentially to allow for an adequate investigation of the report and to comply with applicable privacy laws.
- 9.2. A Reporting Person may indicate that his or her report should be treated anonymously. The name of the Reporting Person who submitted a report in good faith will not be disclosed to others within or outside the Company unless the Reporting Person gives his or her prior written consent or the Company is required to comply with a legal or regulatory obligation. The Reporting Person is entitled to deny or withdraw his or her consent at any time and must be informed of this right prior to giving consent.
- 9.3. The information received will only be shared with others within or outside the Company if and to the extent this is required to appropriately deal with the report and the issues raised in it. Again, the name of the Reporting Person will not be disclosed unless the Reporting Person has given his or her consent or there is a legal or regulatory obligation to do so.
- 9.4. The Company will generally notify the person implicated in a report that concerns have been raised in relation to him or her. The Company will make this notification within a reasonable time and take into consideration the interests of the investigation. The Company will take all reasonable measures to prevent the person implicated in a report from learning the identity of the Reporting Person who submitted the report. The Company will also take all reasonable measures to procure that the identity of any third party referred to in the report is protected.
- 9.5. These confidentiality guidelines do not apply to a report that was not made in good faith (without prejudice to applicable privacy laws).

10. How will I be protected if I report a concern?

- 10.1. No Reporting Person who, in good faith, raises a concern involving matters covered by this Policy will suffer harassment, retaliation or any other adverse employment consequences as a result of raising a concern. The Company will not tolerate any form of threat or retaliation and will take disciplinary action against relevant co-workers or managers where appropriate.
- 10.2. A Reporting Person who believes he or she has been penalised because of the Reporting Person's status as a reporter of suspected Misconduct or due to participation in the investigation of a report is encouraged to immediately report this conduct to EthicsPoint or to the Reporting Officer to allow the Company to take appropriate remedial measures.
- 10.3. The Company may only take disciplinary actions if the Company concludes that a report has not been made in good faith, for example, because false allegations have been made knowingly, improperly, maliciously, or for personal financial gain.
- 10.4. If the Reporting Person who reported the concern was personally involved in suspected Misconduct, reporting the Misconduct does not exempt the Reporting Person from possible disciplinary actions by the Company or civil, criminal or regulatory liability. In determining appropriate disciplinary action, the Company will take into consideration that the Reporting Person voluntarily and in good faith reported the suspicions of Misconduct through this Policy.

11. Can I report concerns outside the company?

Reporting Persons are encouraged to report their concerns internally. Reporting Persons may, however, also report their concerns externally.

(a) External reporting

External reporting of Deviations can have serious impact for the Company and, for the any persons involved. This may also include the Reporting Person. Given the severe consequences of external reporting, Reporting Persons are strongly encouraged to seek advice first – from the Confidential Adviser, for example. If an external report is to be made, it should be made to a competent regulator and in an appropriate manner taking into consideration the legitimate interests of all involved.

As a matter of example, a Reporting Person may report externally to the investigation department (*afdeling onderzoek*) of the Dutch Whistleblowers Authority. For more information regarding the Institute for Whistleblowers and its procedures, please consult the website (<https://www.huisvoorklokkenluiders.nl>).

Depending on the subject matter of the report, also other authorities may be competent, for example:

- Authority for Consumers and Markets (ACM)
The Netherlands Authority for Consumers and Markets (ACM) ensures fair competition between businesses, and protects consumer interests.
- Dutch Authority for the Financial Markets (AFM)
The Dutch Authority for the Financial Markets (AFM) responsible for supervising the operation of the financial markets. This means that AFM supervises the conduct of the entire financial market sector: savings, investment, insurance and loans. By supervising the conduct of the financial markets, AFM aims to contribute to the efficient operation of these markets.
- Dutch Data Protection Authority (Dutch DPA)
The Dutch Data Protection Authority (Dutch DPA) supervises processing of personal data in order to ensure compliance with laws that regulate the use of personal data.

(b) Publication (*openbaarmaking*)

Except in rare circumstances, reporting matters to the press or on social media will not be appropriate or permissible. Such could be the case if:

- before the public disclosure you have reported the Deviation in accordance with this policy and there is reasonable grounds to believe that the investigation will not be conducted in a timely manner, or
- you have reasonable grounds to believe that (a) there is an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage, or (b) there is a risk of retaliation if the Deviation is reported to the competent authority.

Given the possible severe consequences of publication, Reporting Persons are encouraged to seek advice before reporting any concern outside the Company. They can do so with the Confidential Advisor. In the Netherlands, Reporting Persons may also consult the advisory department of the Dutch Whistleblowers Authority.

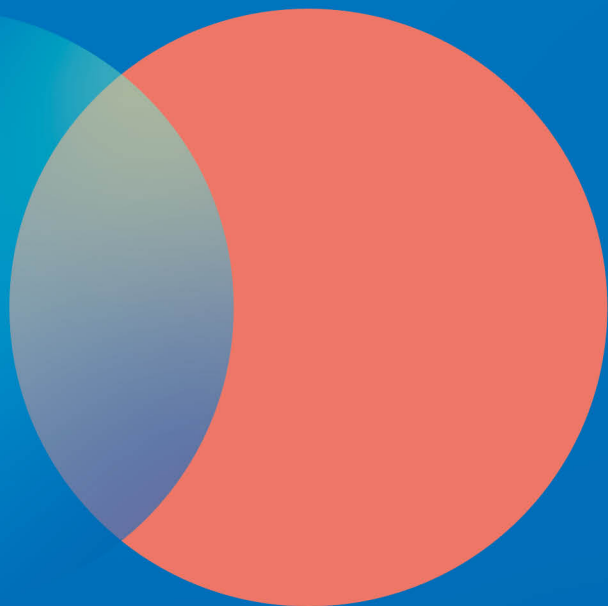
12. Privacy

For details about the Company processes regarding personal data, please consult the Code of Business Conduct.

13. Policy effectiveness and Amendment

- 13.1. The Policy has been approved by the Company's Board of Directors and is effective as of the date below.
- 13.2. The Policy may be amended by a resolution of the Company's Board of Directors. Unless the announcement specifies otherwise, amendments to the Policy enter into force from the moment that they are announced.
- 13.3. The Policy is governed by Dutch law.
- 13.4. This Policy and other materials about reporting suspicions of Deviation will be published on the Technip Energies intranet and the Technip Energies' website, www.ten.com.

Adopted on October 31, 2023, effective as of October 31, 2023.



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