



# ANTIBRIBERY, CORRUPTION AND INFLUENCE PEDDLING POLICY

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This policy defines Technip Energies' commitment to compliance with all anti-corruption and influence peddling laws wherever we conduct business.

At Technip Energies, we:

- Comply with all applicable international and national legislation against illegal payments, including, but not limited to, French anti-corruption laws (including SAPIN II), the U.S. Foreign Corrupt Practices Act (FCPA), and the U.K. Bribery Act (UKBA).
- Have a zero-tolerance policy for all acts of corruption (including bribes, facilitation payments, kickbacks, and self-dealing), such as proffering, without right, at any moment, directly or indirectly, offers, promises, gifts, presents, or any advantages, to unduly induce those in public or private sector to perform or not perform any act within their activity, function, position, or office, or facilitated by their occupation, position, or office.
- Prohibit influence peddling, which includes the offer of anything of value, directly or through a third party, to a public or governmental official so that the official abuses or seeks to abuse their power to influence a decision.
- Prohibit facilitation payments (which are designed to expedite routine and administrative government action) except in extraordinary circumstances where the safety or security of an employee is in immediate danger.
- Prohibit any offer or acceptance of improper payments to obtain or retain business with those in public or private sector or as a reward for awarding contracts.
- Perform due diligence on third parties prior to engaging and proactively manage third parties throughout the lifetime of their engagement, on a risk-based approach, to ensure their strict adherence to our policies, standards, and procedures.
- Train personnel most exposed to corruption and influence peddling risks regarding Technip Energies' internal requirements on a regular basis, including the Code of Business Conduct.
- Develop a speak-up culture where our employees are encouraged to report concerns with respect to any potential violation of Technip Energies' Code of Conduct, or our policies, standards, and procedures.

All employees must:

- Abide by Technip Energies antibribery and corruption internal requirements to prevent, detect, and react to improper dealings.
- Ensure that records of expenditures properly reflect the nature of all Technip Energies' transactions.
- Use reporting channels to promptly report any act of corruption or any attempt to conceal corruption and promptly seek advice from management or Ethics & Compliance.

Preventing corrupt behavior is everyone's responsibility. Every employee is encouraged and expected to decline or stop work if they consider their actions to be against the best interest of Technip Energies.

Any violation of this policy may result in disciplinary action up to, and including, termination.

**Arnaud Pieton**  
Chief Executive Officer  
September 2024

**Yann Aubin**  
Chief Compliance Officer  
September 2024