

TOTAL HOLDINGS UK LIMITED

MODERN SLAVERY STATEMENT for 2017

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Total Holdings UK Limited's anti-slavery and anti-human trafficking statement made on behalf of its relevant UK registered affiliates¹ (for the purpose of this statement "Total Group UK") for the financial year ending 31 December 2017.

Introduction

Following the publication of Total Group UK's first [Modern Slavery Statement](#) in 2017, we have continued to extend our actions on Modern Slavery, focusing particularly on identifying Modern Slavery risks within the business and our supply chain and following up on any risks identified. We have highlighted some of the actions taken in 2017 by Total Group UK towards the end of this statement.

Total Group UK has been present in the United Kingdom for more than 50 years with activities ranging from exploration and production, gas, renewables and power, refining and chemicals, trading and shipping and marketing of petroleum products. Total Group UK is ultimately wholly owned by Total SA (including its subsidiaries, "Total"), a top tier international energy company with worldwide exploration, production, processing and marketing activities employing more than 98,000 people across in excess of 130 countries. Total SA's shares are listed and publicly tradeable on the Euronext Paris Stock Exchange and the New York Stock Exchange.

Total requires high professional standards of behaviour in all its business dealings and has implemented a range of policies, guides and training to ensure these high standards are met. In Total's [Human Rights Guide](#) the CEO of Total, Patrick Pouyanné, sets out human rights as one of Total's three priority business principles,

'Respect for Human Rights in the workplace for our employees and promotion of these principles in our supply chain, in particular by preventing child and forced labor, avoiding discrimination, observing workers' rights and by respecting freedom of expression.'

In pursuance of this priority business principle, Total Group UK is committed to preventing slavery and human trafficking in its own activities and in its supply chain by requiring suppliers

¹ The relevant affiliates include Total Lindsey Oil Refinery Limited, Total Gas & Power Limited, Total Gas & Power Chartering Limited, Total E&P UK Limited, Total Finance Corporate Services Limited and E.F. Oil and Gas Limited, all of which have approved their own statement and have agreed for it to be incorporated by Total Holdings UK Limited into this statement to be issued on their behalf.

to maintain ethical business practices and in particular to prevent slavery and human trafficking in their businesses.

This statement sets out the steps taken by Total Group UK to ensure that there is no slavery or human trafficking in its own business and to require suppliers to take the same approach in the supply chain.

This statement relates to actions and activities undertaken during the financial year ending 31 December 2017.

Organisation and Supply Chain

Total Group UK engages suppliers of goods and/or services in the UK and abroad.

Total Group UK's main customers are companies to which it supplies goods and/or services through its exploration and production, gas, renewables and power, refining and chemicals, trading and shipping and marketing and services activities.

Total Group UK has a supply chain to support the production of its speciality products and its business operations. This includes:

- **Speciality Products:** finished products are manufactured at Total Group UK's company-owned plants within the UK, multiple Total Group owned plants throughout Europe and a limited number of external suppliers.
- **Raw Materials:** Total Group UK manufacture the majority of their finished products within its UK based plants, which require the acquisition of raw materials. The suppliers of such raw materials are either other affiliates of the Total Group or external suppliers.
- **Business Operations:** in addition to the manufacture and sale of speciality products, Total Group UK also has a number of other supply chains related to general business operations including those relating to its 3 sites within the UK, digital presence and employee benefits.

Implementing our Commitment

Total, and Total Group UK, implements its commitment to eradicate modern slavery in its business in 4 ways: policies, governance and processes, supply chain and due diligence, training.

1. Policies

At a corporate level directives and policies exist which apply to all staff. Consistent with International and EU legislation on human rights, Total has directives and policies concerning the prevention of modern slavery and guides to educate staff regarding their obligations. These directives and policies are adopted by local subsidiaries so as to ensure consistency across the Total Group level and maintain Total's international reputation.

The relevant policies are set out below.

2. Governance and processes

The Group's Ethics Committee is responsible for the general oversight of the implementation of the [Code of Conduct](#). The Ethics Committee provides guidance to the business regarding compliance with the [Code of Conduct](#) and investigates and addresses any complaints of breaches of the Code of Conduct including with respect to human rights. The Chairwoman of the Ethics Committee of Total reports directly to the CEO, Patrick Pouyanné. She also reports regularly to the Group's Executive Committee and to the Governance & Ethics Committee of the Group's Board of Directors.

In addition, Total Group UK has an Integrity Committee, which is responsible for promoting compliance with and the understanding of the Code of Conduct.

Staff are encouraged to report any possible breach of the Code of Conduct, by "speaking up" through a whistleblowing policy. This can be done in several ways, as set out below.

3. Supply chain and due diligence:

Total's Code of Conduct requires that our suppliers meet equivalent standards to those in the Code of Conduct, make sure that their own suppliers also respect equivalent standards, and require suppliers to pay particular attention to their Human Rights standards including employees' working conditions.

In addition contracts with our corporate suppliers require the contractor to adhere to Total Group's [Fundamental Principles of Purchasing](#) which include provisions regarding respecting human rights at work, as set out below.

4. Training

Training at a corporate level includes online and face to face training programmes to ensure that employees are familiar with the requirements of the [Code of Conduct](#), the company policies and our individual obligations to respect human rights. Additional training is organised at an affiliate level.

Our Policies and Processes

Total's key policies concerning the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking, applied in Total Group UK's operations, are as follows:

- **[Code of Conduct](#)**: Total's Code of Conduct has specific priority principles to which employees and suppliers must adhere. The third priority principle relates to respect for internationally recognised Human Rights standards, in particular:

1. The Universal Declaration of Human Rights

2. The UN Guiding Principles on Business and Human Rights
3. The Fundamental Conventions of the ILO.
4. The OECD Guidelines for Multinational Enterprises.
5. The Voluntary Principles on Security and Human Rights.
6. The United Nations Global Compact.

In addition, in 2015, Total's CEO signed a [global agreement](#) with IndustriALL Global Union, which represents 50 million employees across 140 countries. The agreement provides a formal framework for safeguards and standards at the global level, covering social, environmental and CSR issues such as developing employee dialogue and promoting Human Rights, diversity and workplace safety. A review committee (the "FAIR Committee") made up of representatives from Total and trade unions affiliated with IndustriALL meets annually to assess the implementation of the agreement and identify areas for improvement and actions to be carried out.

The Total Code of Conduct, available in 19 languages, can be found here:

<http://www.total.com/en/our-group/ethics/exemplary-behavior>

- The [Human Rights Guide](#), and [Business Integrity Guide](#), provide more detailed guidance on the matters addressed by the Code of Conduct.
- [Fundamental Principles of Purchasing](#): Suppliers are required to abide by our Fundamental Principles of Purchasing.

The [Fundamental Principles of Purchasing](#) contains several key principles concerning health, safety and the environment, anti-corruption compliance and other matters, and in particular requires our suppliers to respect human rights at work in compliance with the international standards referred to above.

Total Group UK works with its suppliers to ensure that they meet the standards of our Code of Conduct and Human Rights Guide and improve their workers' working conditions.

Serious violations by a supplier of Total's Code of Conduct entitle Total Group UK companies to terminate the contract.

- **Recruitment/Agency workers policy:** Total Group UK uses its own internal recruitment teams along with selected, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Processes – reporting and audit:** The Code of Conduct specifically encourages employees to "speak up": that is, to report any instances of non-compliance with the Code of Conduct, including any breaches of human rights.

Employees may report matters of concern to their immediate manager, a Human Resources manager, any other manager, their Compliance Officer, their Ethics Officer or directly to the local Integrity Committee or corporate's Ethics Committee via its helpline.

Total regularly conducts internal ethical evaluations and human rights assessments of affiliates, including Total Group UK companies, to ensure that they are complying with the requirements of the Code of Conduct. Total also undertakes social and labour rights evaluations of its suppliers. These are conducted on an ad hoc basis by independent, external contractors, and cover the requirements of compliance with human rights requirements.

Supply Chain: Due diligence

In the procurement of goods and services, we strive to ensure the prevention of illegal labour through the enforcement of the policies already referred to, engagement with our suppliers, contractual clauses, audits and assessments aimed at ensuring that any supplier guarantees their workforce is suitably competent, trained and employed in full compliance with applicable laws, including the use of foreign employees.

“At risk” suppliers are required to complete a due diligence questionnaire concerning their compliance with Total policies, the Modern Slavery Act 2015 and with international standards concerning forced labour and related matters. At corporate level, in line with the Fundamental Principles of Purchasing and the Group's Human Rights Roadmap, Total has entered into a partnership with a 3rd party service provider to conduct social and labour rights audits of its suppliers. The audits process is being continuously reviewed with a view to strengthening its value in improving respect for human rights, including the prohibition of forced labour and child labour in the supply chain.

In addition to its internal assessments, relevant Total Group UK companies utilize the industry recognized Achilles Pre-qualification Database for supply chain management in its qualification of potential suppliers. For each supplier, registration in the Achilles database involves responding to a due diligence questionnaire in respect of the supplier's efforts to prevent slavery and human trafficking, including provision of key company policies and documentation in place to support the information provided by the supplier.

Highlighted Actions taken in 2017

On December 11, 2017, Total Group UK participated in holding the 3rd edition of the Total Group Business Ethics Day held every year to mark the UN International Anti-Corruption Day and Human Rights Day with the theme: “Business and Respect for Each Other: How to Handle Dilemmas”.

After carrying out risk assessments in 2016, Total Group UK companies have taken a number of follow up actions to address Modern Slavery issues within each of their businesses. The nature of the business activities for each company within Total Group UK is different but some examples of the actions taken by the relevant Total Group UK companies in 2017 are as follows:

- Questionnaires developed or continued to be sent out to suppliers in 2017, following identification of at risk suppliers in 2016. Responses to those questionnaires continue to be evaluated and follow up action is taken where necessary. This monitoring of the supply chain will continue to be developed into 2018.
- Relevant supplier framework agreements have been updated to include a modern slavery clause and this is applied where possible. This process will continue into 2018.
- In addition to the Audit Procedures put in place and still in application, identification of some specific suppliers to be audited by a specialized company.
- Creation of a consolidated Modern Slavery information gathering tool and sharing of best practices amongst UK affiliates of the Total Group.

Approval

This statement has been approved by the Board of Directors of Total Holdings UK Limited. The Board has authorised a Director, Jean-Luc GUIZIOU, to sign the statement.

Signed

for Total Holdings UK Limited

Jean-Luc GUIZIOU

Director

21 June 2018