

TechnipFMC Supplier & Subcontractor Integrity Expectations

TechnipFMC (hereafter “TFMC”) is committed to maintaining the highest standards of business ethics, following all applicable laws and regulations, and operating with safety and integrity foremost in mind. To get the job done for our customers, TFMC relies on a complex array of third parties including individuals and business entities. TFMC’s reputation for ethical behavior and legal compliance is directly impacted by the conduct of its Suppliers & Subcontractors. As a TFMC Supplier or Subcontractor, you must agree to follow the applicable laws of each country in which you operate and observe the principles of the TFMC Code of Business Conduct (hereafter “Code”) as well as these Supplier & Subcontractor Integrity Expectations.

As a condition of any business relationship with TFMC, Suppliers & Subcontractors must adhere to principles of TFMC’s Code (and to Supplier/Subcontractor’s own Code of Business Conduct if it is materially equivalent to that of TFMC’s) along with these Supplier & Subcontractor Integrity Expectations. By entering into an agreement with TFMC, TFMC presumes you have read and adopted the principles addressed in the Code and expects you to adhere to our Supplier & Subcontractor Integrity Expectations set out below.

Ethical Business Conduct

Suppliers & Subcontractors will engage in honest and forthright business practices, including:

- Adhering to all applicable laws and regulations;
- Having a zero tolerance policy towards bribery, corruption, facilitation payments and other unethical practices such as unlawful tax evasion and colluding with competitors;
- Not offering gifts, hospitality or any form of social donation to third parties on behalf of TFMC.
- Understanding that TFMC prefers to deal with its counterparties directly, and notifying us immediately if any sales agents have been used to seek to obtain business contracts with TFMC; and
- Having in place effective processes and procedures to promote awareness and embed ethical business practices and compliance with laws.

Trade Compliance

Suppliers & Subcontractors will comply with all relevant trade restrictions and requirements under applicable laws and regulations, including:

- Correctly classifying its products, software and technology that it imports and exports;
- Communicating the correct customs and export control classification, value and country of origin of all items provided to TFMC; and
- Obtaining all applicable approvals, authorizations and licenses prior to exportation.

Antitrust and Competition Compliance

- Suppliers & Subcontractors will comply with all applicable antitrust and competition laws and will have in place effective processes and procedures to proactively prevent anti-competitive behavior and support fair competition.

Conflict of Interest

- Suppliers & Subcontractors will avoid and take proactive steps to prevent and disclose any actual, potential or perceived conflicts of interest.

Respect for the Environment

- Suppliers & Subcontractors will abide by all applicable environmental laws and regulations and when on TFMC premises will also adhere to TFMC’s additional environmental standards.
- Suppliers & Subcontractors should devise processes to ensure that their business is conducted in a safe and environmentally conscious manner.

Security and Safety

- Suppliers & Subcontractors will maintain facility security procedures to prevent the introduction of non-manifested cargo into outbound shipments such as but not limited to drugs, explosives, biohazards and other contraband.
- Suppliers & Subcontractors will observe TFMC Standards related to a drug and alcohol-free workplace.

Human Rights

- Suppliers & Subcontractors are fully committed to respecting and conducting their business in compliance with all internationally recognized human rights standards including those set out in the Universal Declaration of Human Rights and the International Labor Organisation Declaration on Fundamental Principles and Rights at Work and have an approach to human rights consistent with the United Nations Guiding Principles on Business and Human Rights.



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- Suppliers & Subcontractors will have processes in place to assess and mitigate human rights risks in connection with the performance of any services for TFMC.

Privacy Compliance

- If Suppliers or Subcontractors process personal data as part of their services to TFMC, Suppliers / Subcontractors must act in accordance with all TFMC privacy policies and requirements, as well as applicable laws and regulations.

Protecting Confidential Information

- Suppliers & Subcontractors will have effective protocols in place for securing and protecting TFMC information including: a) respecting the proprietary and intellectual property rights of TFMC; b) having information classification protocols and adopting industry best practices, on sharing, protecting and securing information; c) observing all data privacy legal requirements on the collection, processing and transfer of TFMC personal data; and d) reporting any suspected or actual information security incidents that impact TFMC information or systems to TFMC as soon as practically possible.

Speak Up

- Suppliers & Subcontractors must promptly notify TFMC of any failure to comply with TFMC policies (including the Code) or any other illegal or unethical activity related to TFMC's business.
- Violations or suspected violations should be reported through the Supplier's or Subcontractors' company contact or via TFMC's Ethics Helpline (online or via telephone).
- Suppliers & Subcontractors will have a zero tolerance policy on retaliation against anyone who is reporting violations or suspected violations in good faith.

Additional Resources

For further information, please consult the following links:

- **TFMC Code of Business Conduct:**
<https://www.technipfmc.com/en/about-us/ethics-and-compliance>
- **TFMC Professional Partners Privacy Notice:**
https://www.technipfmc.com/-/media/technipfmc/Downloads/technipfmc_privacy-notice.pdf
- **TFMC Ethics Helpline:**
 - Report online at:
<https://secure.ethicspoint.com/domain/media/en/gui/20623/index.html>
 - Report toll free at:
 - +1 877 488 8384 in the USA
 - +44 (0) 800 032 8483 in the UK
 - +33 0800 902500 in France
 - +55 0800 8911667 in Brazil
 - A full list of local numbers is available in the above TFMC Ethics Helpline link.