



**TOTAL UK LIMITED**

## **MODERN SLAVERY STATEMENT for 2018**

*This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Total UK Limited's anti-slavery and anti-human trafficking statement for the financial year ending 31 December 2018.*

### **Introduction**

Following the publication of Total UK Limited's Modern Slavery Statement in 2018, 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 2018 by Total UK Limited towards the end of this statement.

Total UK Limited 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 100,000 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. Total's non-financial performance metrics, including actions in support of human rights, are also reported in the Group's Registration Document 2018.

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 labour, avoiding discrimination, observing workers' rights and by respecting freedom of expression.'*

In pursuance of this priority business principle, Total UK Limited is committed to preventing slavery and human trafficking in its own activities and in its supply chain by requiring suppliers 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 UK Limited 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 2018.

## Organisation and Supply Chain

Total UK Limited supplies goods or services in the UK and abroad and acquires goods and/or services in the UK and abroad.

Total UK Limited's main customers are companies to which it supplies goods and/or services through its marketing and services activities.

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

- **Specialty Products:** finished products are manufactured at Total UK Limited's company-owned plants within the UK, multiple Total Group-owned plants throughout Europe and a limited number of external suppliers.
- **Raw Materials:** Total UK Limited 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 specialty products, Total UK Limited 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 UK Limited, implement their commitment to eradicate modern slavery in their 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 UK Limited has a Compliance and Ethics Officer, who 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 comply with Total’s Fundamental Principles of Purchasing, 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, and those of their suppliers.

Contracts with our 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. Every new employee of Total UK Limited must complete an online training course, which includes modules relevant to Modern Slavery.

## 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 UK Limited’s operations, are as follows:

- [Code of Conduct](#): Respect for Human Rights is one of the core principles to which employees must adhere. Respect for Human Rights includes respect for internationally recognised Human Rights standards. In particular we abide by:
  1. The OECD Guidelines for Multinational Enterprises.
  2. The United Nations Global Compact.
  3. The Universal Declaration of Human Rights
  4. The UN Guiding Principles on Business and Human Rights
  5. The Fundamental Conventions of the ILO.
  6. The Voluntary Principles on Security and Human Rights.

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 UK Limited works with its suppliers to ensure that they take special care to comply with the Fundamental Principles of Purchasing and improve their workers' working conditions.

Serious violations by a supplier of Total's Fundamental Principles of Purchasing entitle Total UK Limited to terminate the contract.

- **Recruitment/Agency workers policy:** Total UK Limited uses its own internal recruitment team 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 Group's Ethics Committee via its helpline [ethics@total.com](mailto:ethics@total.com). In addition, employees have access to a free, third-party whistleblowing service. Total UK Ltd's suppliers' employees, as well as any other stakeholder, can contact the Ethics Committee to ask questions or report incidents where there is a risk of breach of human rights.

Total regularly conducts internal ethical evaluations and human rights assessments of affiliates, including Total UK Limited, 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.

- **Actions:** 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..

Since 2018, TOTAL has been a member of the United Nations Global Compact action platform on Decent Work in Global Supply Chains, and, in this capacity, takes part in various workshops that aim to help the member companies of the Global Compact to make progress in this area. In December 2018, TOTAL signed the “Six Commitments” of this United Nations Global Compact action platform.

TOTAL is an active member of IPIECA's Supply Chain Working Group. TOTAL continues to participate in the operationalisation of the UN Guiding Principles work organized by IPIECA, aimed at both oil and gas companies and engineering, procurement and construction (EPC) contractors.

### **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, and 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.

### **Highlighted Actions taken in 2018**

In 2018 Total published a new Code of Conduct which renewed our commitment to the international reference standards, and restated our values.

In June 2018, at corporate level, the International Procurement Days brought together 170 procurement representatives present in 41 countries, including a member of Total UK Ltd's purchasing team. The Fundamental Principles of Purchasing were distributed during the event and the internal supplier qualification and audit processes were presented.

In September 2018, TOTAL, BP, Equinor and Shell announced their intention to develop a common collaborative approach to assess the respect of human rights by their suppliers. The goal of this common approach is to encourage the improvement of working conditions in the supply chain.

In December 2018, Total UK Limited participated in the annual Total Group Business Ethics Day held every year to mark the UN International Anti-Corruption Day and Human Rights Day.

After carrying out risk assessments in 2016 and 2017, Total UK Limited has taken a number of follow up actions to address potential Modern Slavery issues within its business including:

- Questionnaires developed and continued to be sent out to suppliers in 2018. 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 in 2019.
- Total UK Limited's general terms and conditions of purchasing have been updated to include a modern slavery clause.

- Relevant supplier framework agreements have been updated to include a modern slavery clause and this is applied where possible. This process will continue in 2019.
- Creation of a consolidated Modern Slavery information gathering tool and sharing of best practices amongst UK affiliates of the Total Group.
- Specific training on Modern Slavery for Total's UK group companies (including Total UK Ltd) was prepared in 2018 (and conducted in early 2019).

### **Approval**

This statement has been approved by the Board of Directors of Total UK Limited. The Board has authorised a Director, John Wilson (Managing Director), to sign the statement.

Signed

On behalf of Total UK Limited

John Wilson

Director

Date: 30 May 2019