

# Our Code of Business Conduct

October 2024





# We are all responsible

Our vision is to enhance the performance of the world's energy industry, and how we do business is as important as why we do business. We act ethically, lawfully, and in accordance with our core values and our foundational beliefs in all that we do.

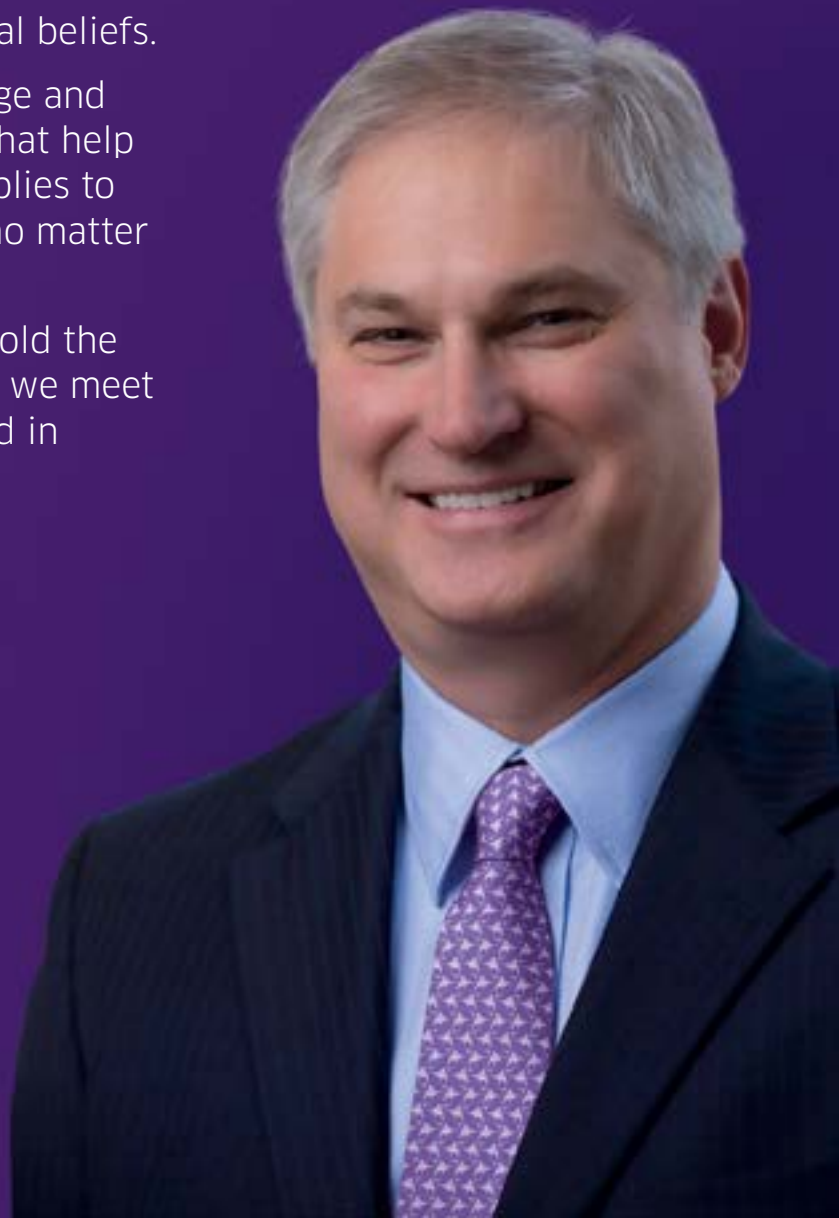
We never compromise on safety, integrity, quality, respect and sustainability in the decisions we make, and our Code of Business Conduct is built on these foundational beliefs.

Our Code gives us a common language and playbook for decisions and actions that help us live our core values. The Code applies to all of us – no matter what our role, no matter where we work.

It is up to all of us – we must all uphold the principles in the Code to ensure that we meet our ambitions and succeed today and in the future.



Doug Pferdehirt  
Chair and Chief Executive Officer



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# What is TechnipFMC's Code of Business Conduct?

This Code of Business Conduct (our Code) is built on our core values and foundational beliefs.

The Code describes the decision-making and behaviors expected of you and of the company when dealing with each other and our stakeholders. It is intended to give you additional guidance to ensure that we do business and conduct ourselves in a TechnipFMC way.

This Code works in conjunction with our policies and procedures, which are published on our internal website. Do not hesitate to refer to them when you need a fuller explanation of TechnipFMC's principles.

# What is our role?

Each of us plays a role in maintaining the company's reputation, and together we create the TechnipFMC culture.

## **Our Code applies to each of us:**

- ▶ All directors, officers, and employees
- ▶ All employees of our subsidiaries and affiliates
- ▶ Anyone who represents TechnipFMC or acts on our behalf, including contract employees, and temporary staffing employees, partners, subcontractors, suppliers, contractors, third-party intermediaries

## **We are all expected to:**

### **Live**

Read and understand the guidance provided in this Code of Business Conduct and our policies, and live them every day.

### **Lead**

Help other team members follow our Code through leading by example and providing training on the issues your business faces most often.

### **Support**

Create an environment that encourages other team members to raise ethical concerns early.

### **Report**

Report behaviors that may violate the guidelines set out in our Code and our policies.

### **Stop**

Intervene, without hesitation, to stop any activity by others that conflicts with our policies or our Code.

## **Sharing our Code:**

We aspire to develop business relationships with like-minded clients, subcontractors, suppliers, and business partners who are guided by a similar set of principles of business conduct.

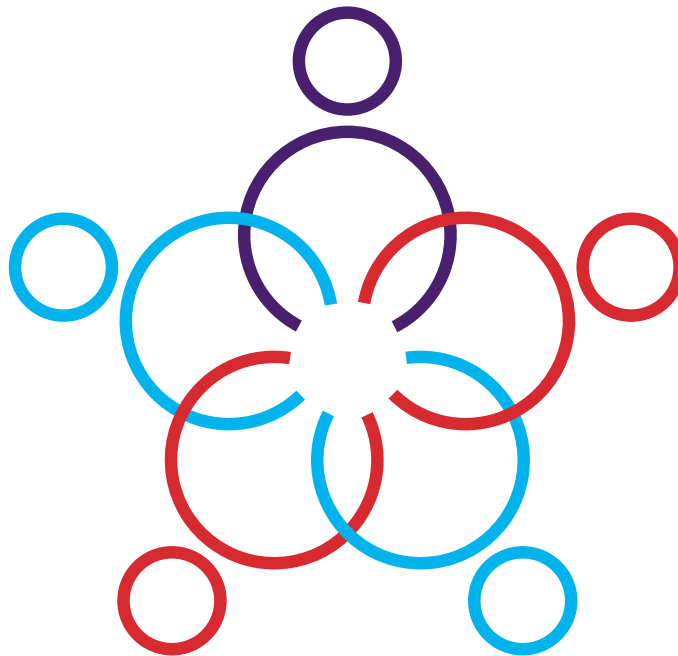
This Code should be shared and discussed with clients, suppliers and our business partners to better explain our rules of conduct and reinforce our culture of accountability.

# What are our core values?

Our values reflect how we do business and conduct ourselves every day. They define our aspirations and the company we want to be. They are the drivers in building a global, collective sense of identity.

Values guide how we act – with ourselves, each other, and our clients, partners and stakeholders – to reinforce the TechnipFMC way.

We have values because our individual behaviors and actions make a difference. Applying our values every day helps us achieve our ambitions and succeed today and in the future – as we enhance the performance of the world's energy industry.





## Our core values

Our core values are the drivers that guide how we act in a distinctly TechnipFMC way, so we can deliver on our purpose and achieve our vision. We bring our values to life through our behaviors – specific, observable and measurable actions.



### Realizing possibilities

We relentlessly progress and seek new, innovative solutions, exploring all opportunities to maximize our potential

#### We strive for ever better

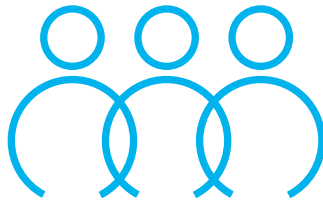
We continuously improve and innovate how we work and what we deliver

#### We take initiative

We proactively work to reach our highest potential in everything we do

#### We learn from success and failure

We learn from every step we take to constantly progress and find better ways



### Achieving together

We work as a single team, collaborating and sharing in order to make the greatest impact

#### We work as one team

We prioritize collective success and work toward common goals together

#### We share knowledge

We communicate openly and volunteer our knowledge and insights to help others reach their best

#### We embrace diversity of thought

We welcome new ideas to unlock our shared potential – no one knows as much as everyone



### Building trust

We collaborate transparently to address what truly matters and always deliver what we promise

#### We listen to improve

We listen carefully to deeply understand what matters most and focus on how to address it

#### We partner constructively

We work closely and transparently in true partnership, tackling challenges with a positive mindset

#### We seek to outperform

We are focused on doing the job right and aim to deliver beyond the expected

## Our foundational beliefs

Our foundational beliefs are the cornerstone of our values that describe how we fundamentally do business and what we never compromise on, no matter the circumstances.

### Safety

We will not compromise on health, safety, and security

### Integrity

We hold ourselves to the highest integrity principles

### Quality

We deliver the highest quality in everything we do

### Respect

We treat everyone honestly, fairly, and courteously

### Sustainability

We act responsibly, always considering our impact on the planet, people, and communities in which we operate

As you read through our Code, you will see how the foundational beliefs are tangibly embedded in each chapter.

# What should you do if you have a concern?

If you are unsure how to resolve a situation, ask yourself these questions:

- ▶ Are the actions legal?
- ▶ Are the actions consistent with TechnipFMC's foundational beliefs and core values?
- ▶ Do the actions set a good example?
- ▶ Would I be comfortable talking about the actions with my colleagues, family, and friends?
- ▶ Have I asked for advice from others who have knowledge of the topic so I can make an informed decision?

**If you answer no to any of these questions, a violation of our Code or policies has occurred or may occur, and you have the responsibility to report it.**

The important thing is to not leave your concerns unresolved.

**You can report your concerns through any of these channels:**

No matter what reporting channel you use, the Chief Compliance Officer will receive the complaint and make sure the information is collected and stored securely.

- ▶ Your direct manager or someone else in your management.
- ▶ The Chief Compliance Officer or anyone in Legal and Compliance.
- ▶ Any officer of the company.
- ▶ Your Human Resources representative.
- ▶ Your regional legal department.
- ▶ An independent third party via the dedicated reporting Integrity Helpline.

# Will you get in trouble for reporting?

TechnipFMC has a zero-tolerance policy on retaliation against employees for reporting suspected violations of our policies or Code of Business Conduct.

We encourage employees and others to raise questions and concerns to ensure that we are leading by example.

Retaliation against anyone who makes a good-faith report of possible violations of our Code or policies, or cooperates with an investigation, is strictly prohibited.

Report the details of retaliation to Compliance anyone in the Corporate Compliance department, or to the Chief Compliance Officer right away.

# Our response to concerns

We treat all reports of suspected violations of our Code confidentially and will share the information only with those who “need to know” to investigate and properly resolve the issue.

Any person reporting – including in an anonymous manner – a suspected violation of our Code will be informed of the reception of the concern as well as the progress and closing of the investigation.

If you are asked to participate in an investigation, you must assist honestly and openly. In certain circumstances and in accordance with applicable laws, when investigating concerns, TechnipFMC may access, review, and disclose information processed or stored by the company’s equipment, devices, or computers.

We will quickly investigate all reports and take necessary action, including disciplinary action when appropriate.

## **Situations that can lead to disciplinary action include:**

- ▶ Violating the Code, standards, or policies.
- ▶ Asking others to violate our Code, standards, or policies.
- ▶ Failing to report a known or suspected violation of our Code, standards, or policies, subject to mandatory provisions of applicable law.
- ▶ Failing to cooperate honestly and openly with an investigation of a possible violation of our Code, standards, or policies.
- ▶ Retaliating against anyone who makes a report of a possible violation of our Code, standards, or policies.
- ▶ Knowingly reporting a false allegation of possible violation of our Code, standards, or policies.

Anyone who is responsible for inappropriate conduct or retaliatory measures will be subject to disciplinary sanctions in accordance with applicable rules and regulations, which can include actions up to termination.

# Getting trained on our Code of Business Conduct

Code of Business Conduct training is available. Our training programs are key to reinforcing integrity, compliance, and competence in our company. You are required to complete Code of Business Conduct and any other compliance training assigned.

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# Behavior at work

We believe that all our employees are entitled to fair treatment, courtesy, and respect of their rights, wherever they are working – in the office, on vessels, on industrial and construction sites, or in client offices.

## How to behave

Trust the team and do not accept any disparagement of colleagues. Every achievement and every failure should be shared.

We will maintain a culture of trust and mutual respect and dialogue throughout our business. We listen, motivate, and support others to achieve common objectives, and we value the contributions of others.

We do not tolerate any form of abuse, violence or harassment and will not tolerate any action, conduct, or behavior that is humiliating, intimidating, or hostile.

## Always

- ▶ Be open-minded, transfer our knowledge, and share information as needed, subject to TechnipFMC's rules on confidentiality.
- ▶ Create a positive work environment and report any abusive, violent or harassing behavior.
- ▶ Foster an objective approach based on mutual respect to recognize each other's contributions.
- ▶ Encourage your team to report any instance of harassment such as physical or social isolation (silent treatment) or indecent proposals for employment advantages.
- ▶ Speak up and tell a person if you are upset by his or her actions or behavior. Explain why and ask that the behavior stop.

## Never

- ▶ Engage in physical or verbal behavior that could be characterized as offensive, intimidating, malicious, or insulting.
- ▶ Make unwelcome sexual suggestions or advances.
- ▶ Make racial, ethnic, religious, age-related, or sexual jokes or insults. If you are not sure whether something is appropriate, assume that it is not.
- ▶ Distribute offensive materials, including inappropriate pictures, jokes, or cartoons.
- ▶ Disclose personal information or spread malicious rumors.



# Fair employment practices and equal opportunity

Our hiring and employee development decisions are fair and objective. Therefore, employment decisions will be based only on qualifications, performance, skills, and experience.

## How to behave

Because we strive to create a positive work environment, it is not uncommon for us to attract members of the same family to be our employees.

We ensure that employment-related decisions are based on relevant qualifications, demonstrated skills, performance, and other job-related factors.

We ensure that our suppliers, customers, and business partners are aware of our goal of creating a diverse and tolerant workforce.

## Always

Treat everyone fairly and without any form of discrimination.

- ▶ Make sure your employment decisions related to recruitment, selection, evaluation, compensation, development, promotion etc., are not influenced by: race, color, religion, gender, age, ethnic origin, nationality, sexual orientation, marital status, social and legal status or physical ability or disability.

Explain that hiring decisions are made based upon the needs of our organization and managed by our Human Resources when you receive a resume from a third-party asking to consider their application.

## Never

- ▶ Tolerate unlawful discrimination related to employment.

To avoid even the appearance of a potential conflict of interest, do not:

- ▶ Maintain a direct or indirect reporting relationship with a family member.
- ▶ Interfere in any aspect of your relatives' employment (recruitment, selection, evaluation, compensation, development) during their career with the company.

➤ We strive to implement the most efficient and environmentally friendly solutions available while protecting our people and reducing the impact of our activities at all times.



# Health, Safety, and Environment (HSE)

At TechnipFMC, we strive to implement the most effective, efficient and environmentally friendly solutions available while protecting our people and reducing the impact of our activities at all times. We will not compromise safety, health, security or environmental sustainability to achieve results.

We are committed to fostering an incident-free environment worldwide, based on the principle that all incidents are preventable. Our clients, shareholders, suppliers, contractors, partners and employees have the right to expect excellent HSE performance from us.

## How to behave

The key to HSE success is a strong culture where all employees work together to prevent incidents and take ownership of HSE, regardless of their position. A strong HSE culture relies on visible and effective leadership and communication of procedures that focus on actively managing risks present in execution of our projects. This drives a high awareness of our procedures and empowers our people to get personally involved when an HSE risk exists.

We expect all our employees to know their role in our HSE culture and procedures and why they exist. We also expect them to act as HSE leaders and take specific and effective actions that protect the health and safety of our people and minimize the impact of our activities on the environment.

## Always

- ▶ Know and comply with the applicable health, safety, and environmental rules and regulations.
- ▶ Understand the risks related to a job and implement the required measures and actions to protect health, safety, and the environment and prevent incidents before beginning operations.
- ▶ Intervene if health, safety, or environmental rules are not duly respected, and stop an unsafe act or condition.

## As a manager, you have further responsibility to always:

- ▶ Act as role models for others by demonstrating positive HSE behaviors.
- ▶ Make employees, contractors, and suppliers aware of applicable HSE rules, procedures, and expected behaviors, and their role in HSE culture wherever we operate.
- ▶ Ensure that effective health, safety, and environmental management systems and procedures are in place and functioning at each area, and that a positive HSE culture exists.
- ▶ Ensure that people reporting to them receive the required HSE-related training, including training in TechnipFMC's HSE culture change program (Pulse).
- ▶ Follow up and correct HSE issues that are brought to their attention.
- ▶ Encourage employees to stop working when there is an unsafe condition and welcome intervention.
- ▶ Praise good HSE practices and challenge poor ones.

# Human rights

We are committed to recognizing human rights on a global basis. Our business conduct is informed by the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. We prohibit any form of forced, indentured, or involuntary labor, human trafficking and do not tolerate use of prohibited child labor regardless of where we conduct business.

We ensure fair labor practices and comply with local laws regarding employment, working hours and wages.

We respect our employees' rights and freedom to associate and collective bargaining in a manner that is consistent with applicable laws.

We respect the rights of local communities by addressing the potential impacts of our operations on their environment.

We comply with all applicable laws relating to conflict minerals.

We will do business only with those who respect human rights and uphold labor laws. We expect our business partners to respect the human rights of those working within or affected by their business.

## How to behave

TechnipFMC's reputation is built on the personal behaviors of our employees across the world. All of us must understand and follow these principles:

### Always

- ▶ Treat people with dignity and respect.
- ▶ Act without discrimination or prejudice.
- ▶ Create an environment that is free from harassment and violence.
- ▶ Ensure that our business partners and suppliers do not engage in inappropriate labor practices, including forced labor or illicit forms of child labor.
- ▶ Promote equality in the workplace with salaries based on merit.
- ▶ Cooperate with regular inspections and audits to verify that our values are implemented throughout the company.

## Never

- ▶ Discriminate in any form, whether based upon race, nationality, religion, gender, age, ethnic origin, place of residence, sexual orientation, marital status, social and legal status, or physical ability.
- ▶ Tolerate violate, sexual harassment or violence, or any other form of harassment in the workplace.

# Community involvement

The communities in which we work are important stakeholders for TechnipFMC, and we strive to be a responsible corporate citizen.

## How to behave

Our employees are encouraged to ensure that TechnipFMC is a responsible corporate citizen in our communities.

### Always

- ▶ Design sustainable development initiatives with a focus on long-term added value.
- ▶ Engage with local communities impacted by our activities in close coordination with our clients and contribute to social and economic self-sustainability.

- ▶ Anticipate and minimize potential disruptions to the community.
- ▶ Mitigate any negative impacts to local communities from our activities.
- ▶ Contribute to local employment growth by fostering training and transfer of skills and technology.
- ▶ Respect local cultures and be aware of local practices and traditions, legislation, and cultural factors that may impact behaviors and decisions.

# Immigration compliance

We are committed to making sure the employment, travel, transfer, and residence of employees conform to applicable immigration and employment laws.

## How to behave

We do not hire or recruit anyone not legally authorized to work in the country in which employment is sought.

Each of us is accountable for maintaining our immigration status in compliance with the laws of the countries in which we work.

### Always

- ▶ Ensure that you have appropriate visas and other permits before traveling into a country.
- ▶ Ensure that you have the appropriate work permits required to be an employee of TechnipFMC.

### Never

- ▶ Travel without a passport or other applicable identification.
- ▶ Misrepresent your identity or fail to disclose applicable information relating to immigration or employment.

# Security

Our objective is to ensure the security of TechnipFMC employees and our clients and business partners at our work sites wherever we operate.

Our employees travel all over the world. We are committed to ensuring their protection during transit and at their final destinations.

## How to behave

Security requires the commitment of everyone to ensure the protection of all. You are the primary caretaker of your security. This is why it is essential that you know and respect the security measures in place at your worksite, whether that is in an office, a plant, or construction site.

## Always

- ▶ Follow the TechnipFMC security recommendations and travel requirements for the country where you are working.
- ▶ When you receive a security message following a change in the security of your work environment, comply with the new security measures and ensure that your colleagues are aware of the message.
- ▶ Be aware of the emergency procedures applicable to your worksite so you know what to do in case of an incident, including the location of the muster point.
- ▶ Follow the general security precautions to reduce your exposure to risks during travel.
- ▶ If you receive a package or letter of suspicious origin, do not open it or try to identify the contents. Immediately contact your security manager.
- ▶ If you see a suspicious or unauthorized person in the office or in a restricted area, immediately contact your security manager.
- ▶ Ensure that you have the local manager's duty phone number in case of a security incident.
- ▶ Make sure your badge is visible when you are working in the office or on a project site.
- ▶ Accompany all visitors in the office or on a project site.

## Immediately report to your security manager:

- ▶ If you are the victim of a theft in the office, on site, or while traveling.
- ▶ If you witness a security breach.
- ▶ If you receive a package or letter of suspicious origin. Do not open it or try to identify the contents.
- ▶ If you see a suspicious or unauthorized person in the office or in a restricted area.
- ▶ If you see anything suspicious.

## While traveling:

- ▶ Ensure that you have a means of communication that works in your destination country.
- ▶ Read the latest security information before traveling to a foreign country.
- ▶ Pay attention to personal belongings in crowded places and public areas.
- ▶ Beware of questionable offers such as advantageous exchange rates, sightseeing visits, organized tours, and offers of free services.
- ▶ Be sensitive to cultural and religious differences when traveling in a foreign place.



➤ Security requires the commitment of everyone to ensure the protection of all.



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# Protection of intellectual property

TechnipFMC's intellectual property includes our patents, copyrights and trademarks, as well as all proprietary documents, data, know-how, work product and processes that employee's access, use and contribute to everyday. We use this living domain of information and intangible assets to develop and deploy products and services in a way that no other company can. Maintaining the integrity of our intellectual property is key to ensuring the future success of TechnipFMC.

➤ We must all protect and respect TechnipFMC's patents, copyrights, trademarks, and proprietary confidential information.

### How to behave

We must all protect and respect TechnipFMC's patents, copyrights, trademarks, and other proprietary confidential information. Confidential information requires special care, regardless of whether it is documented, as it exists across all company areas and can be lost if shared unintentionally or improperly. Known or suspected violations of TechnipFMC intellectual property should be reported immediately to the legal department.

At the same time, TechnipFMC must ensure that it respects the intellectual property rights of others. We must comply with all laws, regulations, and contractual obligations regarding the valid intellectual property rights of others. We are responsible for protecting third-party confidential information that we are authorized to use, and therefore we must all take the same care with our customers', subcontractors', and suppliers' confidential information as we do with our own.

It is crucial to mitigate these risks and safeguard our intellectual property by reviewing new products, software, processes, and services for potential intellectual property rights. Additionally, we must ensure that they do not violate the intellectual property rights of others. We also must understand the scope of confidential information we interact with, be careful not to unintentionally share confidential information, and seek the necessary approvals and protections when sharing is required.

### Always

- ▶ Seek guidance/clearance as soon as possible from the IP department before commercializing any new or modified software, process, method, product or service.
- ▶ Follow all guidelines, requirements and legal obligations for the classification and protection of TechnipFMC confidential information.
- ▶ Protect confidential information entrusted to us by our customers, subcontractors, and suppliers with the same care as TechnipFMC's confidential information.
- ▶ Disclose new innovations to the IP department before discussing outside of the company, even pursuant to confidentiality obligations.
- ▶ Execute timely patent disclosures, applications, and assignment documents required to protect our intellectual property.

- ▶ Collaborate with caution. Sharing information about our technology developments and innovations with others, even our customers, can erode our ability to protect those innovations.
- ▶ Remember, your confidentiality obligations continue after you leave TechnipFMC.
- ▶ Discuss the use of third-party intellectual property or confidential information with your legal department.
- ▶ Notify the IP department of any known or suspected violations of TechnipFMC's intellectual property.

### Never

- ▶ Divulge a previous employer's confidential or proprietary information.
- ▶ Provide information about a new service or product before a patent application has been filed or the Intellectual Property department has decided not to pursue a patent.
- ▶ Discuss disclose or otherwise share TechnipFMC confidential or proprietary information with third parties, except when such discussions are covered by a duly approved and executed confidentiality agreement. Confidentiality agreements are limited in time and scope so care must be taken to ensure that any disclosure meets contractual requirements.
- ▶ Disclose a third party's proprietary information when TechnipFMC has an obligation to keep it confidential.
- ▶ Copy and use materials from publicly available sources without approval to do so.
- ▶ Collaborate or develop new technology with an outside party – even a customer – without contract provisions addressing the ownership of new intellectual property rights.
- ▶ Disclose a third party's proprietary information when TechnipFMC has an obligation to keep it confidential.

# Accurate books and records

Accurate books and records refers to all the financial and non-financial business information that we record and report. These must be done honestly, accurately, exhaustively, and objectively to protect our credibility and reputation, meet our legal and regulatory obligations, fulfill our responsibility to shareholders and other stakeholders, and inform and support our business decisions and actions.

While our work to ensure accurate books and records is most visible in the finance, treasury, accounting, payroll, tax, and controlling departments, all employees play a role in ensuring the accuracy and completeness of our financial information.

## How to behave

When you are booking a financial transaction, creating purchase orders, completing your timesheet, or filing an expense report, you are creating a financial record that needs to comply with these guidelines. We never tolerate fraud.

### Always

- ▶ Make accounting decisions based on TechnipFMC's financial standards and recognized accounting standards.
- ▶ Speak to your Controller if you are uncertain of the right way to record or report a transaction.
- ▶ Inform your supervisor when you believe a record or report does not accurately reflect the underlying transaction.
- ▶ Report any concerns or irregularities in auditing or internal controls first to your line manager. If you feel that this does not resolve the issue, consider using one of the other reporting channels.
- ▶ Be conscious of the confidential nature of the financial information you handle. Do not give or grant access to confidential information to outsiders or use it for personal gain. When in doubt, ask your manager before you distribute information.
- ▶ Know the external and internal reporting standards and ensure they are followed.
- ▶ Ensure that all transactions are properly authorized and recorded accurately and completely.
- ▶ Submit, record, and authorize only valid transactions.
- ▶ Record transactions in a timely manner, minimizing errors caused by delays between transactions and their recording.
- ▶ Ensure that all counterparties are appropriately set up in the company's systems. This includes customers, suppliers, third-party intermediaries, professional advisers, joint-venture partners, and any other business partners.
- ▶ Ensure that no undisclosed or unrecorded amount, fund, or asset is established or maintained.
- ▶ Watch out for unauthorized payments or invoices as described in the Anti-corruption section of this Code.
- ▶ Ensure that all books and records are supported by documentation to provide an auditable record of the transaction.
- ▶ Cooperate fully with all reviews, including internal and external audits.
- ▶ Report any concerns or irregularities concerning accounting, auditing, and internal controls.

### Maintaining accurate books and records requires:

- ▶ Creating records that are up to date, accurate, reliable, verifiable, and in line with applicable rules, laws, regulations, and company policies.
- ▶ Presenting fair, complete, accurate, timely, and understandable reports for internal and external users.
- ▶ Safeguarding company assets to minimize risk of financial loss.
- ▶ Developing and maintaining robust costing systems that provide high-quality financial information and support the company's strategic management initiatives.

### Never

- ▶ Falsify a report, document, or record, or make a deliberately false or misleading entry in them.
- ▶ Record invalid transactions; especially if they are likely to defraud anyone of money, property or honest services.
- ▶ Establish accounts, companies or arrangements to circumvent or frustrate TechnipFMC controls, policies or procedures.
- ▶ Influence others to do anything that could compromise the integrity of TechnipFMC's financial records and reports.
- ▶ Commit TechnipFMC to contractual or other financial obligations unless you are authorized to do so.
- ▶ Process transactions without proper validation.
- ▶ Sell, transfer or dispose of company assets without the proper documentation and authorization.
- ▶ Obstruct or influence the authorized activities of a regulator. This might include concealing, altering, destroying or tampering with information.

“The expense report includes incomplete and inaccurate expenses.”

**Beware of any activities that do not respect the following principles:**

- Authorization. The transaction you are recording or the information you are distributing has been authorized by the correct person(s).
- Validity and clarity. Our financial records should reflect only events that have actually happened, or events we know with a high degree of certainty will happen.
- Appropriate accounting treatment. Records and reports are created in line with the applicable rules, which are consistently applied.
- Completeness and accuracy. The information captured in our financial (and non-financial) systems, including business expenses, must be complete and accurate.
- Dissemination of information. Exchange information with your colleagues in all applicable entities, locations, and departments in relation to the events and transactions you are recording while respecting the rules of confidentiality.
- Timeliness. Every manager should establish firm but realistic timelines for processing financial records and set deadlines for financial reporting, and employees should strive to adhere to them.

# Information security

Information security seeks to preserve the confidentiality, integrity, and availability of information to reduce the risk and the impact of potential threats to our business and operations.

Protection of TechnipFMC know-how is crucial to preserving our business and competitiveness on a daily basis. Information security aims to protect this know-how and reduce the risk of IT disruptions.

- Although cyberattacks are complex, they always start with an imprudent act or a lack of awareness.



### How to behave

Comply with the security standards and with the rules related to the use of our information systems. Learn about internal control procedures and contractual confidentiality clauses, especially on projects. Read information security news and alerts from the Security and IT departments.

Although cyberattacks are complex, they always start with an imprudent act or a lack of awareness. Therefore, the most important thing you can do is read awareness information and remain vigilant at all times, especially when handling emails, browsing the web, or taking outside phone calls.

### Always

- ▶ Beware of suspicious emails and phone calls, especially from someone you don't know.
- ▶ Be wary of emails that contain a link.
- ▶ Remain vigilant and report any potential incident involving confidential or sensitive information.
- ▶ Keep a discreet attitude in all circumstances.
- ▶ Take care of confidential data.
- ▶ TechnipFMC's data must remain on TechnipFMC's IT systems, as a rule of thumb.
- ▶ Protect your laptop with a startup password in addition to the Windows password. If your laptop does not have one, contact your IT Helpdesk.
- ▶ Secure IT tools, technology, and inventory to prevent loss.
- ▶ Regularly account for IT tools, technology, and inventory.

### Never

- ▶ Open links or attachments in suspicious emails.
- ▶ Send any work-related data to your personal email address.
- ▶ Connect to your TechnipFMC mailbox from a public computer.
- ▶ Use public sharing websites to exchange professional documents.
- ▶ Enter confidential information into online translation tools.
- ▶ Use your TechnipFMC email address to register on websites for a private use.
- ▶ Use the same password for all websites.
- ▶ Disclose your travel plans on social media.
- ▶ Leave your laptop or smartphone unattended in a public area.
- ▶ Give any information about TechnipFMC to unknown persons over the phone.
- ▶ Use company assets for personal gain.
- ▶ Store personal information on your company devices and expect that information to remain private.

“The email indicates that it comes from a reputable company, but it originates from a private email address.”

## **Most cyberattacks come through one of three channels:**

### **Email**

A malicious email usually has the following characteristics:

- ▶ It contains an attachment and/or a link to an external website.
- ▶ It comes from an external email address.
- ▶ It looks like it was sent by a well-established institution (including TechnipFMC).

### **Web**

Be vigilant when you browse the web.

- ▶ Do not click on a link that seems suspicious, and do not download any file from an untrusted source.

### **Phone calls**

External fraudsters may use them to try to obtain information about TechnipFMC. Watch out if:

- ▶ An external number appears on your phone's caller ID.
- ▶ The caller takes on the identity of someone in TechnipFMC or one of its partners.

To crosscheck that the phone call was from a legitimate TechnipFMC person, try contacting the person the caller claims to be by phone or email.

➤ All of us are expected to respect the right to privacy and confidentiality of personal data of other employees.



# Privacy and personal data

Personal data is information related to an individual who is or can be identified.

TechnipFMC is committed to protecting personal data stored in information systems by designing and implementing appropriate security and access measures, and we are committed to handling personal data responsibly.

Access to personal data is limited to employees who have appropriate authorization and a clear business need for that information.

## How to behave

We respect the personal lives of employees and do not take an interest in their conduct outside work unless such conduct has an impact on the performance of the employee or affects the reputation or legitimate business interest of TechnipFMC.

All of us are expected to respect the right to privacy and confidentiality of personal data of other employees.

## Always

If you are authorized to access personal data, you must:

- ▶ Access only information with a valid business reason and use it only for that purpose. Adhere to the highest standards of confidentiality when using personal data.
- ▶ Ensure that such information is not provided to anyone outside of TechnipFMC without the proper authorizations.
- ▶ Hold the information for only as long as necessary to meet the business reason for which the authorization was given.
- ▶ Notify TechnipFMC IT and Compliance immediately if you become aware of a personal data breach.
- ▶ Collect only the information necessary to perform your work.
- ▶ Save only required personal data.
- ▶ Transfer personal data internationally in compliance with the privacy laws of the receiving and sending jurisdictions. Check with the legal department to ensure that you know the requirements.

## Never

- ▶ Retain the data for longer than is necessary to complete the business purpose for which it was collected.

# Insider trading and stock tipping

Sometimes, during our work, we learn information about TechnipFMC, our customers, subcontractors, or suppliers that has not yet been made public. If we were to make stock transactions based on this “material information” before it is disclosed to all investors, we would have an unfair advantage.

Using non-public material information for your personal benefit (including stock market transactions) is called “insider trading.” Passing non-public material information along to others, even family members, so that they may use the information for personal gain is called “stock tipping.” These practices erode investor confidence and violate our core values, this Code, and the law.

## Always

- ▶ Keep all non-public material information about TechnipFMC confidential.
- ▶ Treat all non-public material information about our customers and suppliers with the same degree of confidentiality you would give TechnipFMC’s information.
- ▶ Respect all “blackout notices” that prohibit buying or selling TechnipFMC stock during certain periods.

## Never

- ▶ Conduct stock transactions based on non-public material information.
- ▶ Pass along non-public material information to others, or procure any form of TechnipFMC securities based on non-public material information.

# How do I know if information is material or not?

Information is considered “material” if a reasonable investor would consider that information important in making a decision to buy, hold, or sell stocks. Examples of material information are projections of future earnings, loss of a significant project, or other sensitive business plans or strategies. Any information that could be expected to affect TechnipFMC's stock price, whether positively or negatively, should be considered “material” and not be shared with anyone.

# Protecting business and brand

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# Anti-corruption

At TechnipFMC, all acts of corruption (including bribes, kickbacks, and self-dealing) are strictly forbidden. We compete fairly on the strength of our technology, service, and execution excellence. We do not accept corruption in any form and do not make or accept improper payments to obtain or retain business with those in government or the private sector or as a reward for awarding subcontractor or supplier contracts. We are committed to complying with all international and national legislation against illegal payments, including prohibitions on facilitation payments (to expedite routine and administrative government action) except in extraordinary circumstances where the safety or security of an employee is in immediate danger.

➤ We compete fairly on the strength of our technology, service, and execution excellence.

### How to behave

To ensure that our partners share our commitment to ethical business practices and to ensure that our partners' other relationships (including family relationships) do not create the appearance of a potential conflict of interest, we conduct risk-based due diligence on high risk all potential partners before entering into a relationship.

TechnipFMC has established anti-corruption policies and procedures that help us prevent, detect, and react to improper dealings whenever they arise. We must all ensure that we follow these policies and procedures and that we never engage in corruption of public or private individuals or entities.

### Always

- ▶ Contact Compliance for guidance if you are unsure which Compliance Procedure to apply.
- ▶ Ensure that records of expenditures properly reflect the nature of the transaction.
- ▶ Select business entertainment venues and activities that reflect our values.
- ▶ Conduct appropriate due diligence on all consultants, suppliers, business partners, and third-party intermediaries, and ensure that third parties understand TechnipFMC's policy of zero tolerance for corruption.
- ▶ Pay all consultants, third-party intermediaries, and business partners in the country where they performed work.
- ▶ Use the reporting channels to report any act of corruption or any attempt to conceal corruption.
- ▶ Seek advice from your manager or Compliance if you have any doubt about payments that you have been requested to make.

### Never

- ▶ Make payments or provide other objects of value such as gifts, loans, discounts, and excessive hospitality, or using the company's funds or assets to improperly influence a decision under any circumstances.
- ▶ Offer, give, promise, or solicit – either directly or through a third party – any payment or supply of services, gifts, or leisure activities to obtain or retain a market or competitive advantage. This rule applies to transactions with government officials, companies, and private persons.
- ▶ Act in a way that violates local law or the customer's own rules and business guidelines.
- ▶ Provide anything of value that creates the appearance of impropriety.
- ▶ Provide anything of value to gain or retain an improper advantage.

“I’m not sure why my client is involving his brother – a government official – in our project.”

When dealing with business partners, we may encounter warning signs that the business partner may be making improper payments or is otherwise exerting undue influence over decisions to award or retain business.

**These warning signs (sometimes referred to as “red flags”) include:**

- ▶ A request by a commercial consultant to have a commission paid before the announcement of an award decision.
- ▶ Unwillingness by a third party to reveal its ultimate ownership structure.
- ▶ Request from an agent of a country’s customs authorities of a payment or a thing of value (gifts, entertainment, travel) in return for the issuance of the authorization of importation of equipment in connection with a project.
- ▶ Compensation requests not in line with services provided.
- ▶ Lack of support for services vaguely described in invoices or the inability to provide details of the actions taken on behalf of TechnipFMC.
- ▶ Requests for payment in a country other than where the service was provided.
- ▶ Involvement of government officials, including family members or other relatives of government officials.
- ▶ Reception by a TechnipFMC employee of a gift from a supplier which could influence the employee’s judgement during an ongoing tender, in which the supplier is participating.

If you observe any warning signs, promptly contact Compliance for assistance in resolving the issue.

# Who is considered a public or government official?

These terms are broadly interpreted to include any person working for a governmental body, any political party candidate, and any business owned and/or operated by a government official. In addition, “government” includes all branches, levels, and subdivisions of any government.

**Government officials include, but are not limited to:**

- ▶ Any elected or appointed government official or representative.
- ▶ A current or former employee, official, contractor, consultant, or representative of a government or any department, agency, or state-owned or state-controlled enterprise.
- ▶ Any current or former employee or person acting for or on behalf of a government official, agency, or enterprise performing a governmental function, such as a licensing official or a tax intermediary.
- ▶ Any political party, officer, employee, or person acting for or on behalf of a political party or candidate for public office.
- ▶ A person in the service of a government, including members of the military, police, or civil service.
- ▶ Family members and relatives of any of the above.

# Gifts, hospitality, and travel

Although appropriate entertainment can provide an opportunity to build or solidify client relationships or to gain greater insight into key subcontractors and suppliers, there are some forms of gift-giving that could be viewed as inappropriate and could constitute corruption.

## How to behave

If you are presented with a gift or offered hospitality or entertainment, or if you are offering someone a gift, hospitality or entertainment, you need to evaluate whether you may receive or give such gifts in line with the requirements of the company's policies and procedures.

### Always

- ▶ Tell your manager about any gift or invitation offered or accepted, whatever its value.
- ▶ Inform your business partner about TechnipFMC's policy on gifts and entertainment at the beginning of every new business relationship.
- ▶ Speak to your manager if a supplier or a subcontractor offers you gifts or invitations of significant value.
- ▶ Ask for your manager's approval before offering gifts or invitations to representatives of a government official.
- ▶ Accept or offer restaurant invitations only for business-related purposes.
- ▶ Understand local customs and laws before offering or receiving gifts, leisure activities, or other benefits.
- ▶ Take into account the company policy of the person receiving the gift or invitation.
- ▶ Make sure all gifts offered and received are supported by accurate documentation, including invoices and receipts, where applicable.
- ▶ Seek advice from your manager or from Compliance if you are not completely sure.
- ▶ Seek approval before paying for third-party travel expenses or accepting payment of your travel expenses from a third party.


### Never

- ▶ Grant or accept any excessive gifts or entertainment, whether monetary or non-monetary, directly or indirectly, to or from any government official, client, supplier, vendor, subcontractor or any other third party.
- ▶ Let gifts or entertainment influence decisions or be seen as having an influence on those receiving them.
- ▶ Solicit gifts or invitations.
- ▶ Offer or accept gifts, or provide a service that you would have difficulty explaining to your colleagues, your family, or the media.
- ▶ Offer gifts or provide hospitality, even of minimal value, with frequency that can create the appearance of impropriety when aggregated.
- ▶ Offer gifts, entertainment, or travel to government officials without prior approval.
- ▶ Offer gifts or provide hospitality in the form of cash.
- ▶ Accept gifts or hospitality from potential suppliers who could place you in a situation of obligation, especially during critical phases of a decision-making or award process.
- ▶ Accept an offer that exceeds what is considered acceptable at TechnipFMC.



“My supplier wants to give my wife and me tickets to the theater and have dinner on his expense.”

Some gifts and hospitality are, by their nature, illicit and thus prohibited by TechnipFMC. These include cash payments, personal services, loans, gifts, invitations of an improper nature or to inappropriate places or events, meals in which the commercial partner does not participate, and gifts or invitations at periods when important commercial decisions are being made.

A woman with short grey hair and glasses, wearing a blue TechnipFMC shirt, is looking down at a stack of documents. She is holding a red pen in her right hand. The documents include a brochure titled 'Valeurs et Normes Assistants Groupe 3' and another with the 'ANDI SUP' logo. The background shows a red wall with posters and other people in blue shirts, suggesting a community event or training session.

➤ When contributing to local communities on behalf of TechnipFMC, ensure that such giving is in line with our core values and foundational beliefs.

# Donations and charitable contributions

Social donations and contributions are gifts given for a charitable purpose or to support a particular cause. A donation or charitable contribution can be in the form of cash, services, and new or used goods. They also include emergency or humanitarian aid, development aid support, and medical care assistance.

As a responsible corporate citizen, TechnipFMC believes in contributing to the communities where we conduct business by supporting worthy causes, organizations, and activities.

However, in certain circumstances, donations could be considered disguised illegal payments. To avoid these risks, TechnipFMC funds only associations and foundations or takes part in sponsorship projects whose activities are legally acceptable and in line with the values and priorities of the company. Any donation or contribution on behalf of TechnipFMC shall be approved in accordance with the relevant policies concerning social donations and charitable contributions.

## How to behave

When contributing to local communities on behalf of TechnipFMC, ensure that such giving is in line with our corporate values, charters, policies, and procedures. If there is a local charity or social program that, in your opinion, shares the company's values, inform Compliance. TechnipFMC only contributes to local charity or social programs that share the company's ethics. All approved donations must be properly accounted for and accurately reported on the company's books.

## Always

- ▶ Promote the development of local communities through charitable donations that are in line with our values, policies, and procedures.
- ▶ Ensure that charitable organizations do not use donations for illegal purposes.
- ▶ Make all donations in good faith and ensure that proper approvals are obtained in line with the company's policies and procedures.

## Never

- ▶ Give donations that are unreasonably large in value.
- ▶ Give any donation if it is illegal under local laws and regulations.

# Conflict of interest

A conflict of interest may occur when an employee has a financial, business, or personal interest or activity that interferes or appears to interfere with TechnipFMC's interests. There are many situations that are or could be perceived as conflicts of interest.

## How to behave

You are expected to make informed business decisions in the best interest of the company. Any situation in which your personal interests, or the interests of your close personal relations, are, or appear to conflict with TechnipFMC's interests, must be avoided.

Below are common examples of potential or prohibited conflict of interests:

### Financial interests

- ▶ You want to invest in a company you interact with in connection with your work at TechnipFMC (potential conflict).
- ▶ You want to invest material amounts in a publicly traded company competing with or doing business with TechnipFMC (potential conflict).
- ▶ You accept gifts or other form of benefit from a supplier or customer (potential conflict).

### Outside Employment and Affiliations

- ▶ You engage in a self-employment venture that competes with TechnipFMC's business or interferes with your work at TechnipFMC (prohibited conflict).
- ▶ You work for, or serve on the board of directors of, any competitor of TechnipFMC (prohibited conflict).
- ▶ You compete with the company in any way (prohibited conflict).

### Close Personal Relations

- ▶ You are in a direct reporting relationship with a close personal relation (prohibited conflict).
- ▶ You are considering hiring a close personal relation as an employee or contractor (potential conflict).
- ▶ You have a close personal relation with an owner, director, officer or employee of a competitor, customer, supplier or business partner (potential conflict).

## Hiring Government Officials and other Political Activity

- ▶ You work on a political campaign during working hours (prohibited conflict).
- ▶ You express your political views on behalf of TechnipFMC (prohibited conflict).
- ▶ You offer employment to any government officials or their close personal relations or following a customer's recommendation (potential conflict).

## Always

- ▶ Act only in TechnipFMC's interest when conducting professional activities. Refrain from taking advantage of any situation, either directly or through a third party, for your own gain or that of others.
- ▶ Disclose in writing to your manager and your local legal counsel all of your outside interests that create or could appear to create a conflict of interest.
- ▶ Get approval prior to taking a position with an outside business while working for TechnipFMC.
- ▶ Understand the concept of conflicts of interest.
- ▶ Remain aware of any actual or apparent conflicts.
- ▶ Disclose any conflicts to your manager and Compliance, and seek advice on how to avoid the conflict, remove yourself from it, or protect yourself and the company from the consequences of the conflict.

## Never

- ▶ Misuse TechnipFMC resources for personal gain. This includes TechnipFMC office equipment, time, and intellectual property. Any information you obtain through your position at TechnipFMC should not be used for personal gain.
- ▶ Assume that a conflict does not matter because it is too small or petty.
- ▶ Let a conflict linger before disclosing it to the company.

“He uses his company laptop to conduct other business on the side.”

In our work, we may come across a situation that could create a conflict of interest. Warning signs (sometimes referred to as “red flags”) of such a conflict include:

- ▶ A close relative works for a supplier or a customer.
- ▶ You conduct business on the side for your personal benefit (not for the company’s) with your company laptop.
- ▶ You are asked to serve on the board of a competitor, supplier or customer’s company.



➤ Conduct appropriate due diligence on all high risk subcontractors, suppliers, consultants, business partners and third-party intermediaries.



# Money laundering

Money laundering occurs when revenue-generating criminal activity takes place (such as narcotics, bribery or fraud) and the proceeds of that criminal conduct is acquired, used or otherwise dealt with.

As part of ensuring that our financial records are accurate, complete, and transparent, it is also necessary for us to exercise appropriate diligence on high risk customers, subcontractors, suppliers, and other vendors to prevent money laundering.

Appropriate due diligence also prevents “reverse money laundering,” whereby legitimate funds may be used, knowingly or unknowingly, to finance terrorist activities.

## Always

- ▶ Conduct appropriate due diligence on all high risk subcontractors, suppliers, consultants, business partners and third-party intermediaries.
- ▶ Ensure that all payments to subcontractors, suppliers, consultants, and third-party intermediaries are made in accordance with our financial standards, including the requirement that payment be made in the country in which the work was performed.
- ▶ Ask questions if a third-party intermediary or other consultant proposes a transaction structure that seems unusually complex.
- ▶ Be alert to the origin of any money we receive or acquire.
- ▶ Check the legitimacy of the destination of any payment we make.
- ▶ Be aware of and report to Compliance any payments which you suspect may be connected to the proceeds of crime.

## Never

- ▶ Try to investigate any case of money laundering on your own.
- ▶ Reveal your suspicions of money laundering to the other party in the transaction, but seek advice from Compliance.

# Export controls and trade compliance

As a company with global operations, provide products, technology and services to customers and business partners around the world. We must always comply with the applicable customs laws and trade restrictions that apply to us, wherever we do business. In the event a transaction involves a conflict between competing laws of applicable jurisdictions you must consult Legal and Compliance for advice.

## How to behave

We must strictly comply with all customs laws and trade controls that apply to us, wherever we do business.

### Always

- ▶ Follow and adhere to all TechnipFMC processes and policies when performing import or export activities.
- ▶ Ensure that products and technology for export are classified in advance and that all required labelling, documentation and applicable licences, approvals and authorizations are in place prior to shipment or transfer.

## Never

- ▶ Execute a cross-border shipment without conducting the requisite due diligence and complying with all applicable TechnipFMC processes and procedures.
- ▶ Use approved customs agents and freight forwarders only.
- ▶ Consult with Legal and Compliance before transferring controlled technology (engineering drawings, source code, etc.) or software from one country to another or to foreign nationals.
- ▶ Ensure that all transaction parties are screened against relevant restricted party lists.
- ▶ Consult with Legal and Compliance immediately if you are asked to deal with a sanctioned country, entity or individual.
- ▶ Ensure that temporary imports are managed in accordance with import license or customs documents.
- ▶ Remember that carrying equipment or spare parts in your luggage (known as “hand carry”) is subject to the same trade restrictions and customs clearance obligations as any other shipment to that country.
- ▶ Carry equipment or spare parts in your luggage without prior approval, from Legal and Compliance.



Most countries where we operate or conduct business have their own customs laws and foreign policy-based trade controls, including economic sanctions and embargoes, that may govern the import or export of products or services that we procure or supply. Restrictions under trade control laws can target specific countries, business sectors within countries, as well as individuals and organizations. Some countries may also have laws requiring the boycott of other countries, while others have laws that prohibit participating in boycotts.

The penalties for breaching these laws can be severe and may include large fines, revocation of export license privileges, debarment, disqualification of directors, and imprisonment.

# Competition and antitrust laws

We are committed to competing fairly and in compliance with applicable laws governing competition and antitrust. These laws seek to protect markets by fostering fair and robust competition.

Specifically, these laws seek to prevent collusion among competitors and to prevent companies with dominant market position from abusing their market power. They also require prior review and approval for certain transactions, such as mergers and acquisitions, that could substantially reduce or affect competition in the market.

At TechnipFMC, our objective is to conduct our business with the highest standards of honesty, integrity, and fairness and to offer opportunities for success to all our suppliers, partners, and subcontractors in a spirit of fair competition and mutually beneficial collaboration.

It is necessary to have meetings with our competitors from time to time. However, extreme care should be taken to define the purpose and scope of these discussions up front to avoid even the appearance of inappropriate collaboration.

### Always

- ▶ Familiarize yourself with competition law in your business and jurisdiction. Ask legal for advice.
- ▶ Carefully note the origin of any information you may collect on the market regarding competition.
- ▶ Consider whether the reasons for entering into an agreement with a competitor are legitimate.
- ▶ Keep records of meetings with competitors.
- ▶ Pay particular attention to exclusivity agreements and other similar agreements.
- ▶ Pay particular attention to the existence and operation of purchasing groups in which the company desires to participate.
- ▶ Seek guidance from your legal department if you have to deal with R&D or transfer technology agreements.
- ▶ Seek guidance from your legal department and obtain approval from the proper level of management before entering into any trade association.

### Never

- ▶ Agree with competitors to:
  - Exchange information regarding prices, sales volumes, terms of sale (including contractual terms), market shares, production capacities, or cost structure, including by telephone or during informal meetings.
  - Discuss the commercial or industrial policy of TechnipFMC.
  - Participate in collective action aimed at, or having the effect of, preferring or eliminating a competitor, granting it preferential treatment, or exercising pressure or retaliatory measures, or boycotting a customer.
  - Abuse purchasing power, including prohibiting work with or otherwise discriminating against specific suppliers or customers, unless legitimately and objectively justified.
- ▶ Communicate or exchange information with competing buyers regarding our purchasing policies.
- ▶ Give any confidential information about a supplier to its competitors.

➤ We are committed to competing fairly and in compliance with applicable laws governing competition and antitrust.

# Quality leadership

Quality leadership refers to the value of outputs that we deliver to our internal and external customers. The products, services and projects should all contribute to optimal, reliable and safe results that meet requirements each and every time.

TechnipFMC's goal is to be a leader in our industry by providing excellent quality in whatever we do, and maintaining reliable products, asset integrity and services and project execution and installation lifecycle.

## Always

- ▶ Know and comply with our Quality Policy.
- ▶ Cultivate a culture of quality leadership through consciously meeting requirements, continuous learning and improvement through an empowered workforce.
- ▶ Drive accountability and ownership for prevention at all levels within the organization.
- ▶ Be responsible to engage in the improvement of the processes that you operate.
- ▶ When interfacing with the Supply base ensure that our suppliers constantly meet requirements and drive culture of continuous improvement and prevention.
- ▶ Follow documented processes when executing work.
- ▶ Track conformance and identifying issues when they occur.
- ▶ Address all nonconformance issues through root cause analysis and application of prevention.
- ▶ Aim to do things better, faster, and more cost-effectively while always respecting applicable standards and requirements.
- ▶ Intervene if quality behaviors and standards are not demonstrated.
- ▶ Take personal accountability to performing and improving your job through leadership competencies that result in improving business result.

# Political activities

TechnipFMC observes strict political, religious, and philosophical neutrality. Therefore, TechnipFMC's policy is to not make financial contributions to political candidates, elected representatives, political parties, or religious institutions.

TechnipFMC also respects the personal political affiliations of its employees. Nevertheless, these affiliations must not affect the activities or image of TechnipFMC, nor may they affect the political neutrality of the company.

Certain industry association may engage in lobbying activities that benefit TechnipFMC's commercial strategy. TechnipFMC does not, however, as a matter of practice and deference, engage in direct lobbying activities. Any direct lobbying activities, to include their related expenses or any employee's participation or intent to exert political influence on TechnipFMC's behalf, requires CLO and CEO approval and are subject to external reporting requirements.

## Always

- ▶ Participate in political activities in your own name and outside of work.
- ▶ Respect the beliefs of others.
- ▶ Recuse yourself from political decision-making processes that concern TechnipFMC.
- ▶ Exercise your freedom of opinion and political activity outside the scope of your employment, at your own expense and on an exclusively personal basis.
- ▶ Explain clearly that you represent only your own personal views when participating in political activities.
- ▶ Get your manager's approval before communicating in TechnipFMC's name with government representatives on political matters.
- ▶ Think of TechnipFMC's reputation and how the public would perceive your actions when interacting with government representatives.

- ▶ Seek advice from your manager or Compliance if you are solicited for a political donation.

- ▶ Notify your manager if a government official contacts you outside your normal activities.

## Never

- ▶ Use TechnipFMC premises, equipment, or any other assets for political activities.
- ▶ Make a political statement on behalf of TechnipFMC or associate TechnipFMC with your personal political views.
- ▶ Use TechnipFMC's corporate image to support your political views.
- ▶ Use your position at TechnipFMC to urge anyone to make political contributions or to support a political party.
- ▶ Use or allow the use of TechnipFMC's assets or resources for a political campaign, party, or candidate.
- ▶ Use donations for community benefit to hide political contributions.

# Corporate image and brand

Our brand is an asset we need to protect. It is what makes us unique to our stakeholders. It is the personality that we express not only through our visual communications, but also through our collective and individual behaviors.

## How to behave

You have a role to play in protecting and preserving our image. You are an ambassador of TechnipFMC and, as such, you must behave in conformity with our principles as detailed in this Code.

Everyone in TechnipFMC is a brand ambassador, and each of us must maintain and protect TechnipFMC's reputation. Consistent communications with all of our stakeholders is the foundation for our brand, our corporate image, and our commercial success.

## Always

- ▶ Act as a brand ambassador and behave in conformity with our principles as detailed in this Code.
- ▶ Maintain and protect TechnipFMC's reputation.
- ▶ Communicate consistently with all of our stakeholders.

# External communications

Given our global presence, financial market reporting regulations, and renowned technical expertise, TechnipFMC must be particularly vigilant with respect to external dissemination of information. Any misinterpretation could negatively affect the company's image and financial performance.

## How to behave

Only the following people are authorized to release external information:

- ▶ The Executive Chairman, the Chief Executive Officer, and the Chief Financial Officer.
- ▶ By delegation and within the framework of internal procedures for legal and financial disclosure review, Communications, Public Relations, or Investor Relations Department managers.

Any external company communications must be authorized by at least one of the above. TechnipFMC personnel are not authorized to provide or issue company-related information to outside parties without the company's express authorization.

## Always

- ▶ Whoever you meet, share information with care.
- ▶ Disclose only information that is public, meaning it has been published on TechnipFMC's website.

## Never

- ▶ Speak with the media on behalf of the company, unless you are specifically authorized. If you must speak to the media, remember that there is no "off the record."

➤ We must be particularly vigilant with respect to external dissemination of information.

# Social media

Social media is changing the way we communicate, work, and live. TechnipFMC respects the right of employees to use social media as a medium of self-expression.

However, everything our employees post about TechnipFMC can impact the company's reputation. Equally, everything published online remains for a very long time and, in some cases, cannot be undone. Therefore, social media should be used responsibly.

## How to behave

Speak for yourself and be transparent. It is important to understand the difference between mentioning the company and speaking on behalf of it. Communications personnel are TechnipFMC's only official spokespersons in the social space.

Whenever you participate in social media and discuss topics related to the company, make it clear that you are expressing your own opinions and that your comments do not represent the company.

Be responsible and respectful. When communicating online, pay particular attention to issues that are sensitive to TechnipFMC's business and its clients, partners, and suppliers, such as the price of oil and gas, oil spills, and other sensitive topics. In all discussions, use facts and references for your statements when possible. If you are unsure whether a post is appropriate to share, it is better not to post it at all. If you realize you have published an inaccurate statement, acknowledge your mistake and correct it as soon as possible.

Be polite and keep in mind that cultural differences may impede understanding. Avoid using remarks that could be interpreted as offensive, and use a respectful tone even when disagreeing with others.

Protect information, confidentiality, privacy, and intellectual property. TechnipFMC rules apply to social media, and your obligations as a TechnipFMC employee are the same in the digital world as in the physical world. When using social media, never share confidential or sensitive information such as financial and commercial data or any information related to ongoing projects, research and development, legal matters, or strategy.

## Always

- ▶ Post content that represents your own personal views.
- ▶ For security reasons, keep work-related travel or geographical positions confidential.
- ▶ Obtain written permission from the relevant communications manager prior to posting any TechnipFMC photo, video, or logo.
- ▶ Comply with laws and regulations governing intellectual property rights, including copyrights and trademarks.

## Never

- ▶ Publish online anything that would not be publicly available to journalists, clients, and competitors.
- ▶ Post confidential, sensitive, or proprietary information.
- ▶ Post comments about persons or companies that could be perceived as negative or defamatory.





➤ Everything our employees post about TechnipFMC can impact our reputation.

