

WHISTLEBLOWING

In accordance with the provisions of Legislative Decree 24/2023, TotalEnergies EP Italia S.p.A. (hereinafter also "the Company") has activated its whistleblowing reporting channel.

WHO CAN MAKE A REPORT?

The following persons can submit whistleblowing reports that will be handled in accordance with Legislative Decree 24/23:

- employees;
- workers with part-time, intermittent, fixed-term, temporary, apprenticeship and ancillary employment contracts;
- workers performing occasional services;
- self-employed workers working for the Company;
- freelancers and consultants working for the Company;
- volunteers and trainees, whether they receive a remuneration or otherwise, who work for the company;
- the Company's suppliers of goods and services;
- shareholders;
- persons who, also de facto, exercise functions of administration, management, control, supervision or representation of the Company.

WHAT CAN BE REPORTED?

Whistleblowing consist in reporting information on violations of national or European Union law, which harm the public interest or the integrity of the Company, of which the whistleblower has become aware in a work-related context.

The following are not whistleblowing reports:

- ✓ Complaints, claims or personal requests relating to one's employment relationship (to be sent to the relevant company departments)
- ✓ Complaints or disputes concerning the services provided by the Company (to be sent to the relevant corporate functions)

HOW TO REPORT?

INTERNAL WHISTLEBLOWING CHANNELS

Reports can be made by means of the specific Whistleblowing tool accessible [by clicking here](#)

The tool allows reports to be made in written form, by uploading videos and photos, as well as by requesting a meeting with the Head of the Internal Channel.

Who is the Head of the Internal Channel?

The person responsible for receiving and handling whistleblowing reports is the Head of the Internal Channel.

The Head of the Internal Channel may be supported by specifically authorised internal staff by means of a written notice.

Moreover, in carrying out the preliminary investigation, the Head of the Internal Channel may be supported by the relevant corporate organisational units or by external professionals appointed for the purpose.

EXTERNAL REPORTING CHANNEL AND PUBLIC DISCLOSURE

The internal whistleblowing channel must be used first

Whistleblowers can use the **external channel managed by ANAC**, by logging on to <https://www.anticorruzione.it/-/whistleblowing>, only in the following cases:

- the Company has not activated an internal reporting channel, or that channel is not compliant with Legislative Decree 24/2023;
- a report has already been made via the internal channel, but it was not followed up;
- the whistleblower has a well-founded concern that, if he/she uses the internal channel, his/her report will not receive effective follow-up or he/she may suffer retaliation;
- the whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest.

Whistleblowers may also make a **public disclosure** (press and other means of dissemination such as social networks) if one of the following conditions is met:

- the whistleblower has previously submitted an internal and an external report or has directly submitted an external report and has received no reply within the prescribed time limits on the measures envisaged or adopted to follow up on the reports;
- the whistleblower has reasonable grounds to believe that the breach may constitute an imminent or obvious danger to the public interest;

- the whistleblower has reasonable grounds to believe that the external report may entail the risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as cases where evidence may be concealed or destroyed, or where there is a well-founded concern that the person who has received the report may be in collusion with the wrongdoer or involved in the violation.

The above is without prejudice to the right to submit a **complaint** to the national judicial and accounting authorities.

For a thorough analysis:

- of persons who may make a whistleblowing report,
- of the subject of the reports,
- of whistleblowing channels,
- of how a report will be handled,
- of the protection afforded to whistleblowers, whistleblowers who are acting in bad faith and other persons referred to in the law

as well as for all matters not included in this notice, please refer to the Procedure.