

# Tax Transparency Report 2023



**TotalEnergies** 

## CONTENTS

### Introduction

A word from our CFO Our Journey to tax transparency Where to find Glossary Assurance statement 03-07

01

TotalEnergies

at a glance

8-16



02 Our approach to tax

17-35



**03** Our Total Tax Contribution 2023 36-40



**04** Our Country-by-Country Tax Report 2023

41-50



**05** Our Extractive Industries Reports 2023

51-54



Introduction

**01** TotalEnergies at a glance **02** Our approact **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## A word from our CFO



We are pleased to present the latest edition of TotalEnergies' Tax Transparency Report.

With this new release, we are publishing our annual report within 12 months following the year-end, i.e., 6 months earlier than our previous reports. We have maintained the report's content and upheld the rigorous process of internal data verification and assurance statement by our auditors.

This report provides general business information about the Company for the financial year 2023, consistent with previous editions. It includes detailed data on the Company's Total Tax Contribution, highlighting the five highest contributing countries, as well as comprehensive country-by-country tax information sourced from the CbCR filed with the French tax authorities in December 2024, covering 73 countries representing altogether more than 94% of the Company corporate tax liability.

In 2023, profits declined from historic 2022 levels due to lower, but still elevated, oil and gas prices. Consistent with these lower profits, profit and production taxes amounted to \$25 billion (compared to \$33 billion in 2022) and Total Tax Contribution was \$59 billion (compared to \$62 billion in 2022). Due to this significant tax liability, TotalEnergies does not expect that the 15% minimum tax implemented as of January 1, 2024 following the OECD Pillar 2 framework, will result in additional tax payment in France in 2024.

We hope this report will enhance your understanding of our tax contributions and of our commitment to transparency and responsible tax practices.

Sincerely,

Jean-Pierre Sbraire, Chief Financial Officer



#### Introduction

01 TotalEnergies

02 to tax

03 **Tax Contribution**  04 Country Tax Report

2021

**TotalEnergies** 

05 2023

## Our Journey to tax transparency

#### 2015

**First publication** of the list of all consolidated entities and of the Extractive **Industries Report** of Payments to Governments

2017

**First Country**by-Country **Reporting filed** 

2018

**TotalEnergies is the first** company to publicly

support transparency of petroleum contracts

#### 2012

Commitment not to create entities in countries viewed as "tax havens" and to repatriate existing ones when feasible

> **First publication** of our Tax Policy

Formation of the **EITI.** of which the Company is an active member

2003



## 2019

**Endorsement of the B** Team's Responsible **Tax Principles** 

Publication of our Tax Policy in the extrafinancial performance report of our URD

Adhesion to the **French cooperative** compliance program

#### Voluntary adoption of the GRI and World **Economic Forum** transparency

standards

2020

2022 Release of the first Tax Transparency

Report

by the Board

Participation of **TotalEnergies** in the first B Team peer review and in the EITI company assessment

2023

#### 2024 Acceleration of the publication of the Tax Transparency

Report

Updated Tax Policy approved



Introduction	<b>01</b> TotalEnergies at a glance	<b>02</b> Our approach to tax	<b>03</b> Our Total Tax Contribution 2023	<b>04</b> Our Country-by- Country Tax Report 2023	<b>05</b> Our Extractive Industries Reports 2023
Where to f	ind				
OUR DATA		KEY TO	PICS		
2023 Shared value	1	<u>Our Tax po</u>	blicy	18	
Our Effective Tax Ra	ite 3		n on our tax governan ntrol framework	ce21	
Our Total Tax Contri	ibution 3	8			
Our CbCR	4	in controly	n on our presence ersial countries	23	

Reconciliation of CIT information with CbCR and URD 50

Our Tax policy	18
Information on our tax governance	
and tax control framework	21
Information on our presence	
in controversial countries	23
Information on our transfer pricing	
policy	30
Our view on tax incentives	33
Our view on advocacy	
on tax matters	35

Introduction

**01** TotalEnergies at a glance **02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## Glossary

Glossaries on Total Tax Contribution and CbCR are available in Chapter 3 and Chapter 4 of this report.

#### Accelerated depreciation

This is when the write down of an asset's value is greater during the earlier years of an asset's life.

#### Arm's length terms

The pricing of a transaction between related parties, as if the parties were acting as independent entities.

#### Artificial tax structures

These are artificial arrangements to minimise tax payments by shifting profits from one jurisdiction to another jurisdiction.

#### B team's Responsible Tax Principles

Principles around responsible tax policy and practice developed by the B Team.

#### Base Erosion and Profit Shifting (BEPS)

The BEPS project is a joint initiative by the OECD and G20 in 2013 to tackle tax avoidance and profit shifting by multinational corporate groups. It consists of 15 action points to prevent tax-aggressive structures, one of which is the Country-by-Country Report (Action 13).

#### Corporate Income Tax (CIT)

The tax charged on profits. Also called profit tax.

#### Cooperative compliance program

This refers to the specific voluntary program for a transparent relationship between a taxpayer and its tax administration ("relation de confiance" or "partenariat fiscal" in French).

#### Country-by-Country Reporting (CbCR)

A report filed privately with tax authorities showing aggregate data per country on profit, income taxes paid and accrued and key indicators of economic activity.

#### Deferred Taxes

IFRS standards require an entity to recognise a deferred tax liability or (subject to specified conditions) a deferred tax asset for all temporary differences, with some exceptions. Temporary differences are differences between the tax base of an asset or liability and its carrying amount in the financial statements. The tax base of an asset or liability is the amount attributed to that asset or liability for tax purposes.

#### Effective Tax Rate (ETR)

Percentage of the consolidated accrued and deferred corporate income tax charge on the consolidated income before tax as per our consolidated financial statements (unless otherwise defined).

### Extractive Industries Transparency Initiative (EITI)

The EITI is an organization, which brings together representatives of the governments of the member countries as well as representatives of civil society and business in order to strengthen transparency and governance with regard to income from oil, gas and mineral resources and fight against corruption.

#### Exchange of information

The exchange between tax authorities of information relating to taxpayers in each jurisdiction.

#### GRI tax transparency standard

The Global Reporting Initiative tax standard GRI 207.

#### IFRS accounting standards

Accounting standards issued by the International Accounting Standards Board.

#### Joint Venture, an association agreement between two or more parties for the purpose of serving a common project (sharing of costs and risks).

#### OECD

An intergovernmental economic organisation to stimulate economic progress and world trade.

#### Pillar 2 / GloBE

The Pillar Two Model Rules (also referred to as the "Global Anti-Base Erosion" or "GloBE" Rules) are part of the Two-Pillar Solution to address the tax challenges of the digitalisation of the economy that was agreed by 137 member jurisdictions of the OECD/G20 Inclusive Framework on BEPS in October 2021. These rules aim at ensuring that large multinational enterprises (MNEs) pay a minimum effective tax rate of 15% in each jurisdiction where they operate.

#### Tax incentives

Tax reliefs offered by government authorities to encourage economic and social development.

#### Total Tax Contribution (TTC)

A measure of all the taxes that a company pays, whether borne or collected. Taxes borne are a direct cost for the company, whereas taxes collected are collected by a company on behalf of governments.

#### URD

Universal Registration Document (available on the TotalEnergies corporate website).

#### WEF tax transparency standard

World Economic Forum report, Measuring Stakeholder Capitalism, which contains a metric focused on tax.

#### Withholding tax

A tax levied at source on certain types of payments, usually royalties, interest or dividends, where these are made between entities in different countries.

#### Units

**k** Thousand **M** Million **bn** Billion



Introduction

**01** TotalEnergies at a glance **02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023



## **Assurance statement**

A selection of data provided in this report in Chapter 3 (Our Total Tax Contribution) and Chapter 4 (Our Country-by-Country Tax Report) was subject to internal review and reasonable assurance by our statutory auditors, PricewaterhouseCoopers Audit and Ernst & Young Audit, in accordance with the International Standard on Assurance Engagements ('ISAE') 3000 Revised. Our Extractive Industries Reports data in Chapter 5 is published in section 9.3. of our Universal Registration Document 2023. The reasonable assurance reports can be found on the Company website.





# 01

## TotalEnergies at a glance

A multi-energy company	9
Key figures 2023	10
More Energy, Less Emissions	11
Our sustainability ambition	12
Creating shared value	13
A continuous dialogue with our stakeholders	14
Our employees as of December 31, 2023	15
Our shareholders as of December 31, 2023	16



**02** Our approacto tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## A multi-energy company

TotalEnergies is a global integrated energy company that produces and markets energies: oil and biofuels, natural gas and green gases, renewables and electricity. Our more than 100,000 employees are committed to energy that is ever more affordable, more sustainable, more reliable and accessible to as many people as possible.

### Our integrated multi-energy model

TotalEnergies' model of value creation is based on integration across the energy value chain, from exploration and production of oil, gas and electricity to energy distribution to the end customer, and including refining, liquefaction, petrochemicals, trading, and energy transportation and storage.

This integrated business model enables the Company to capitalize on synergies among the various businesses while responding to volatility in feed stock prices.

**TotalEnergies is applying this integrated model to the new electricity and renewables businesses.** Accelerating growth in electricity and renewables will strengthen TotalEnergies' model of value creation and diversify the Company's geographical risk profile. That transition enables to cement the sustainability and resilience of TotalEnergies' value creation model bolstering its ambition of getting to Net Zero (net zero emission).

Natural gas	6
Oil	6
Electricity	¢
ted from circular stic, waste, CO <sub>2</sub> )	C

Solar 🔆

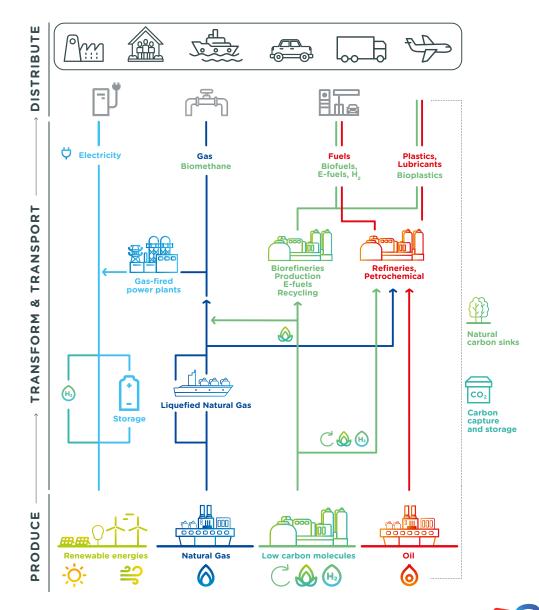
Wind 읙

Biomass resources

Resources generat

management (bio-based pla

Hydrogen 👝



Tax Transparency Report 2023 TotalEnerg

**02** Our approach to tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## Key figures 2023



source : 2023 URD



**02** Our approach to tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## More Energy, Less Emissions

TotalEnergies publishes a *Sustainability & Climate Report* each year, as pledged by the Board of Directors since 2020.

In its latest report released on March 20, 2024, TotalEnergies gives an account of the implementation of the Company's strategy and the progress made in 2023 with regard to the objectives for 2030, notably its achievements in terms of emissions reductions and its contribution to a just, orderly and equitable energy transition for all its stakeholders.

TotalEnergies thus reaffirms the relevance of its balanced multi-energy strategy combining profitable growth and sustainable development, anchored on two pillars: oil & gas, notably LNG, and electricity, notably renewable, the energy at the heart of the transition. In 2023, like in 2022, TotalEnergies was the most profitable major, with a return on capital employed of 19%, while also being the major that invests the most in the energy transition.

In oil & gas, thanks to having refocused its portfolio on assets and projects with low breakeven and low greenhouse gas emissions, TotalEnergies intends to produce oil & gas in a responsible manner, as illustrated by its 2023 achievements in emissions reductions:

- 34% reduction in Scope 1+2 emissions from operated oil & gas facilities compared to 2015;
- decrease, to 18 kg CO<sub>2</sub>e/boe, of the Scope 1+2 emission intensity of upstream oil & gas activities on an equity basis;
- 47% reduction in methane emissions on operated facilities in 2023 vs 2020, already among the lowest in the peer group. In order to concretely transcribe its ambition to aim for zero methane emissions, TotalEnergies extends its objective to reduce its methane intensity to <0.1% by 2030 to the entirety of its operated upstream oil & gas facilities – not just its gas facilities.

<section-header><image><text><text>

In gas, energy of the transition which complements the intermittency of renewable energies in electricity generation and represents a virtuous alternative for countries burning coal for their power generation needs, the Company estimates that its LNG sales contributed to avoiding about 70 Mt of  $CO_2e$  emissions worldwide in 2023.

In electricity, TotalEnergies invested more than \$5 billion in 2023 in lowcarbon energies, essentially in electricity, contributing to building a profitable and differentiated Integrated Power business, which will both become a cash engine for the Company and reduce the emissions resulting from the use of energy products sold to its clients: the lifecycle carbon intensity of energy products sold by TotalEnergies to its customers for final use was 13% lower in 2023 compared to 2015, and is on track to meet the objective of -25% by 2030.

## Thanks to these achievements, TotalEnergies confirms its ambition to become a major player in the energy transition, committed to carbon neutrality in 2050, together with society.

Moreover, with the launch of *Care Together by TotalEnergies*, the Company increases its commitments in terms of social responsibility. In addition to commitments specific to each affiliate, TotalEnergies guarantees compliance with high social standards for all its employees worldwide, regardless of the legislation in force in any given country. This program is based on concrete measures revolving around four pillars: social protection, health, the family sphere and working conditions.



11

**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## Our sustainability ambition

TotalEnergies puts sustainable development in all its dimensions at the heart of its projects and operations to contribute to the well-being of people.

The Company, with a view to a just transition, has structured its sustainable development approach for conducting its activities in order to contribute to the United Nations Sustainable Development Goals (SDGs), to which TotalEnergies has committed to contribute from 2016.

#### TotalEnergies' sustainable development approach is based on four pillars





**02** Our approach to tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## **Creating shared value**

**Creating shared value** (in \$bn)



We are committed that the activities and projects we develop, generate value and positive change. To this end, we act in compliance with our Code of conduct in interaction with all our stakeholders : our employees, customers and partners, host regions, local communities, civil society representatives, suppliers and investors.

Our value creation (approximately \$67 billion in 2023) generates revenues for the governments of the countries where we operate (taxes), for our economic partners, including our suppliers (in the form of investments), our employees (salaries and social charges) and our shareholders (dividends and buy-backs)<sup>(1)</sup>.

**\$24.7 billion out of the \$67 billion value created in 2023 represented profit and production taxes accrued by TotalEnergies** in favour of the countries where the Company operates (all businesses included)<sup>(2)</sup>.

Payments made by the extractive entitites controlled by the Company to governments of states or territories in which we operate, amount to \$28.3 billion in 2023 (see Chapter 5). At the other end of the value chain, on the distribution side of our products, we collected \$18.2 billion in 2023, mainly in excise duties on petroleum products on behalf of governments from consumers.

(1) See our Sustainability & Climate Progress Report 2024, page 96 available on our corporate website, for further detail.

(2) Profit and production taxes are a substantial part of the taxes borne by the Company. For a comprehensive view of all the taxes borne and collected by TotalEnergies in 2023, please refer to our Total Tax Contribution developments in Chapter 3.



**02** Our approach to tax **03** Our Total Tax Contributior 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## A continuous dialogue with our stakeholders

In TotalEnergies' view, dialogue with its internal and external stakeholders is essential for the Company to conduct its business responsibly and integrate the long-term challenges of sustainable development in its strategy and policies. This dialogue contributes to the identification of the main risks and impacts of the Company's activities, and more broadly to a better understanding of changing trends and the main societal expectations of each of the major categories of stakeholders. It is also a prerequisite to ensuring that the Company is firmly integrated in its host regions, as well as an effective tool for identifying ways to generate value at the local level.

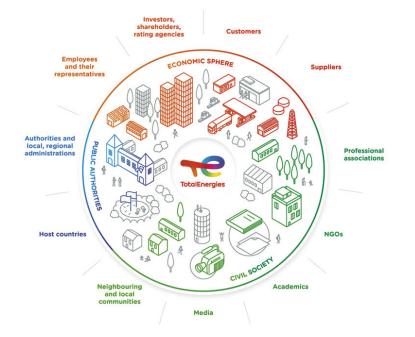
#### TotalEnergies believes that **transparency is an essential principle of action in building a trust-based relationship with its stakeholders and ensuring that the Company is on a path of continuous improvement.**

TotalEnergies is making every effort to report its performance on the basis of the various commonly used ESG reporting frameworks. As such, TotalEnergies refers to the Global Reporting Initiative (GRI) standards and those of the Sustainability Accounting Standards Board (SASB), for which detailed tables of correspondence are available on the TotalEnergies website. TotalEnergies also includes in its reporting the World Economic Forum's core indicators (Chapter 11 of the URD)<sup>(1)</sup>. Furthermore, it also follows the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) for its climate reporting.

## Open dialogue with our stakeholders

TotalEnergies sets up dialogue procedures based on the consultation and involvement of stakeholders in order to develop constructive and transparent relationships with them. This dialogue contributes to identifying main risks and impacts of the Company's operations and, more generally, by providing greater insight into main changing societal patterns and expectations of each of the major stakeholder categories.

## Mapping of our main stakeholders



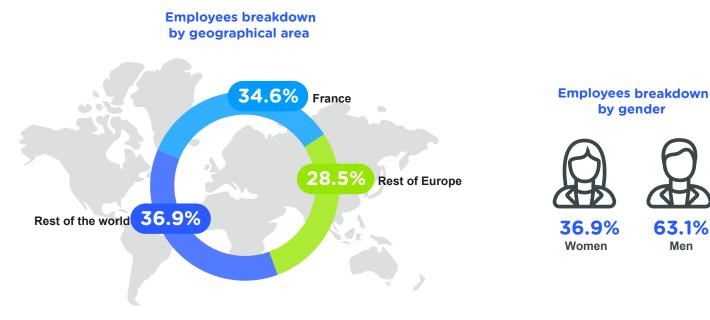
(1) Measuring Stakeholder Capitalism Towards Common Metrics and Consistent Reporting of Sustainable Value Creation, White paper, September 2020.



**02** Our approach to tax **03** Our Total Tax Contributior 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## Our employees as of December 31, 2023



Workforce as of December 31, 2023: 102,579

#### **Proven expertise in 2023**

- ·102,579 employees
- Nearly 170 nationalities
- More than 740 business-related competencies
- More than **461,000 days** of training
- More than **400 talent developers** to help employees along their professional development path

#### **Employees in 2023**

- **\$9.2 billion** payroll (including social security charges)
- More than €200 M for training
- 92.1% of employees on permanent contracts, and women account for 41.2% of employees hired on permanent contracts
- 85.6% of employees hired by the Company and 67.1% of managers hired were non-French nationals

#### Wage differentials

In terms of compensation, TotalEnergies has been adopting specific measures to prevent and compensate for discriminatory wage differentials in several countries. Regular checks are carried out during salary-raise campaigns to ensure equal pay among men and women holding positions with the same level of responsibility.

**02** Our approach to tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

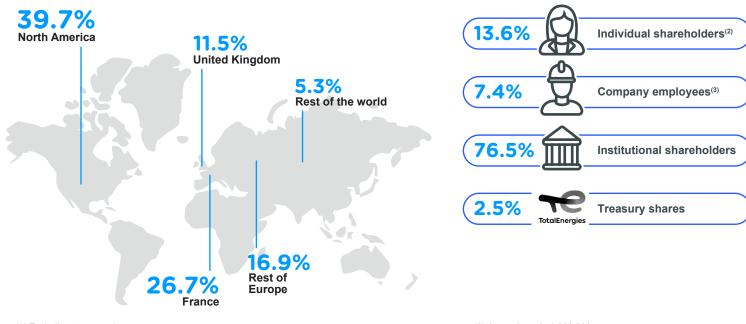
## Our shareholders as of December 31, 2023

#### Shareholding structure by geographical area<sup>(1)</sup>

Estimate as of December 31, 2023, based on the request for the identification of shareholders made on that date, pursuant to Article L. 228-2 of the French Commercial Code.

## Shareholding structure by shareholder type

Estimate as of December 31, 2023, based on the request for the identification of shareholders made on that date, pursuant to Article L. 228-2 of the French Commercial Code.



(1) Excluding treasury shares.

(2) Approximately 1,600,000 Number of individual shareholders.

(3) On the basis of employee shareholding as defined in Article L. 225-102 of the French Commercial Code and Article 11 paragraph 6 of the Articles of Association of the Corporation.







## Our approach to tax

Our Tax Policy	18
Our tax governance	21
Our presence in jurisdictions subject to tax controversy	23
Our view on certain key tax matters	29



2)

**01** TotalEnergie at a glance **02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

**Our Tax Policy** 

With a presence in close to 130 countries and more than 1,360 consolidated entities, the Company carries out its operations in a constantly changing environment.

In this context, TotalEnergies has developed a responsible tax approach based on clear principles of action and rigorous governance rules as set out in its tax policy statement, which is approved by the Board of Directors and available to the public on the Company website.



**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## TotalEnergies Tax Policy

Tax payments of TotalEnergies represent a substantial part of its economic contribution to the countries in which it operates.

Mindful of its responsibility, the Company is committed to paying its fair share of taxes to the host countries of its operations, in compliance with applicable laws and conventions and in accordance with its Code of Conduct.

The structuring of our investments worldwide is driven by our business operations and the regulatory framework. Our tax policy's prime focus is certainty and sustainability in the long term. We thus believe that artificial or aggressive tax planning mostly derives short term tax benefits and is not compatible with a sustainable approach.

We apply the arm's length principle for the determination of our intercompany transfer prices and we pay our income taxes in the countries where we create value, in compliance with applicable laws and regulations.

It is the Company's long-term commitment not to create affiliates in countries generally acknowledged as tax havens and to repatriate or liquidate existing affiliates, where feasible. Government authorities may offer tax incentives to support business sectors, create employment or foster their economic development. The Company may only claim incentives that are aligned with its business strategy, relate to investments with genuine economic substance and meet the requirements set by host countries.

The Company takes a responsible approach to the management and control of taxation issues, relying on well-documented and controlled processes.

The management of tax risks is fully integrated in the Company's global risk governance process. As part of this process, the VP Tax, under the authority of the Chief Financial Officer, oversees the implementation of the tax policy and reports on a regular basis to the Board's Audit Committee on TotalEnergies' tax position. The tax function is made up of a network of qualified and regularly trained in-house tax experts at the corporate level, in the business segments and in the affiliates.

Transparency is an essential factor in building a trust-based relationship with our stakeholders. As a permanent member of the Extractive Industries Transparency Initiative (EITI) since its formation in 2003, TotalEnergies fully supports initiatives for greater transparency and accountability. We encourage governments to ensure that the tax reporting obligations they will impose upon multinational groups are consistent, coordinated and proportionate.





19

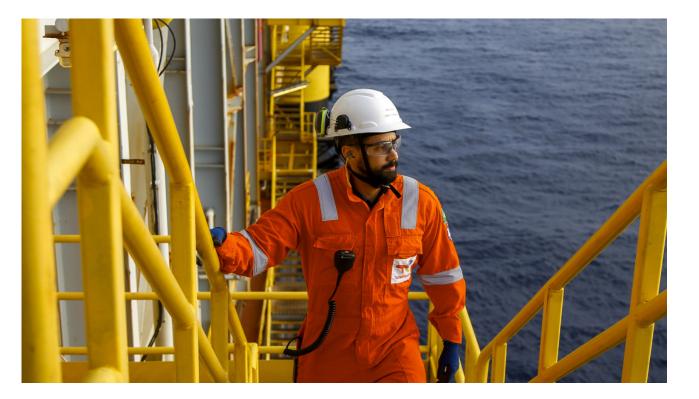
**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

We engage with a broad range of stakeholders, and especially with tax authorities, in a timely, transparent and professional manner which is the basis of a constructive and long-term relationship. In France, the country of its headquarters, TotalEnergies has been part of the cooperative compliance program upon its inception in 2019, thus pursuing greater transparency, dialogue and trust in its relationship with the French tax administration.

As regards advocacy relating to tax matters, TotalEnergies follows the rules set forth under its Code of Conduct and its Advocacy Directive, both available to the public on the Company's website. The Company is committed to fighting any form of corruption and does not intervene in the functioning or financing of the political life in its host regions. It undertakes to convey messages to the authorities that are consistent with its stated positions and strategies and to be transparent about such messages, whether they are positive or defensive, notably with regard to the Company's support for the objectives of the Paris Agreement relating to the fight against climate change.

The Company publishes in its Universal Registration Document an annual report covering the payments made by its extractive affiliates to governments and the full list of its consolidated entities, together with their countries of incorporation and of operations. The Company also issues a tax transparency



report, which provides additional information on the taxes paid in its main countries of operations on a country-by-country basis. This report aims to offer more detailed information on the Company's tax position.

In compliance with its goal to foster a global responsible tax environment and encourage best practices, the Company endorsed the Responsible Tax Principles developed by the B Team, a non-profit organization bringing together business leaders and representatives of civil society with the aim of promoting a sustainable form of economic and social development.

The present tax policy is included in the Company's Universal Registration Document. It is reviewed by the Audit Committee and approved by the Board of Directors.



01

02 Our approach to tax

03 Tax Contribution

04 Country Tax Report 05 2023

## **Our Tax Governance**

**TotalEnergies has developed a responsible** and transparent tax approach based on clear principles of action and rigorous governance rules as set out in its public tax policy statement.

The Company tax policy is reviewed by the Audit Committee and approved by the Board of Directors. It was last revised in 2022. The Company's tax policy principles apply to all controlled affiliates.

The Company takes a responsible approach to the management and control of taxation issues, relying on well-documented and controlled processes. The management of tax risks and the implementation of the tax policy are fully integrated in the Company's internal control and risk management procedures. Internal and external auditors regularly review the Company's tax controls as part of the audit of its financial statements.

The VP Tax, under the authority of the Chief Financial Officer, oversees the implementation of the tax policy and reports at least on an annual basis to the Board's Audit Committee on TotalEnergies' tax position and risks, and adherence to the tax strategy.

The Company's tax policy is distributed to all employees having a responsibility in the tax area. who acknowledge its receipt. It is more largely available to all employees on the Company's internal and external websites. It is regularly explained and discussed within the Company to ensure understanding and adherence to its principles. It is also shared with external advisors.

There are processes in place to provide opportunities for employees or external stakeholders to raise confidentially any issue of concern regarding the application of the tax policy, as for any issue covered by our Code of Conduct. TotalEnergies takes actions to develop a speak-up culture and asks its employees to report any situation that they consider to be contrary to the Code of Conduct. No disciplinary sanction, nor any direct or indirect discriminatory retaliatory measure may be taken against a whistleblower, as long as the alert is raised in good faith, even if the facts subsequently turn out to be inaccurate or unfounded and/or if the situation does not give rise to any proceeding or sanction.

Consistent with its commitment to the **Extractive Industries Transparency Initiative** (EITI) and the B Team's Responsible Tax Principles, TotalEnergies actively promotes responsible tax practices and tax transparency by sharing its experience with peers and industry associations in conferences and public roundtables.

The Company for instance is actively engaged in the Responsible Tax Working Group formed with peers in the B Team. A peer review of the Company's disclosures and accountability practices was conducted within the B Team in 2023 (see the Accountability Report 2024 published by the B Team in May 2024).

TotalEnergies' 2023 assessment toward the EITI standard, which confirmed that substantially all expectations are met, may also be found on the EITI's website.



02 Our approach to tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

#### TAX CONTROL FRAMEWORK

TotalEnergies consistently ensures that an internal control framework, based on the referential of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) is in place. TotalEnergies has a reference framework that is supplemented by a series of practical recommendations and return on experience. The structure of this reference framework reflects that of TotalEnergies' organization : a Company level framework, frameworks by business segment, and a specific framework for each significant operational entity.

The tax control framework is embedded in the Company control framework. It refers to policies and processes that ensure a responsible management of the tax function, consistent with the Company's tax policy and the tax regulation. It is subject to internal and external audits and assurance to verify its adequacy and compliance. It applies to all controlled affiliates.

The principles of control fit into the framework of the rules of corporate governance. In particular, these rules task the Board of Directors' Audit Committee with monitoring the effectiveness of the internal control and risk management systems and of the internal audit, particularly as regards the procedures for preparing and dealing with accounting, financial and extra-financial reporting, and tax matters.

The statutory auditors review the internal control as part of their certification of the financial statements. In accordance with the US Sarbanes-Oxley Act, they review the implementation of the internal control framework and the effectiveness of the key controls for the processing of financial information.

On the basis of the work they have carried out, they have not indicated any material weakness in their report on internal control in 2023. If areas of improvement were identified, corrective action plans would be shared with operational management and implemented with the Audit & Internal Control Division. Based on the internal reviews, General Management has reasonable assurance of the effectiveness of TotalEnergies' internal control.

### A few examples of tax controls

- Consistent with the Company risk mapping process, a tax risk map is prepared and regularly updated by the HQ tax team, and presented to the Audit Committee, This process aims at identifying the main areas of risk, as well as the mitigation measures implemented.
- The Board of Directors, the Audit Committee and an independent third party review the non-financial performance statement published in the Company Universal Registration Document (chapter 5), including its section on the fight against corruption and tax avoidance. A limited assurance conclusion on the compliance of the consolidated extrafinancial statement with applicable regulation and professional guidance was provided by the independent third party for 2023.
- Pursuant to its obligations under the EU DAC 6 Directive of May 25, 2018 (2018/822), the Company is due to report cross-border arrangements that it is involved in or has implemented, either directly or through an intermediary, which could meet any of the hallmarks selected by DAC 6 as potential indicators of tax avoidance or abuse. No aggressive tax scheme has been reported under DAC 6 by the Company since the Directive entered in force.



02 Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## **Our Presence in Jurisdictions subject to Tax Controversy**

Does TotalEnergies have entities in jurisdictions subject to tax controversy ?

### Our situation in black listed countries

Tax controversy primarily targets socalled "tax havens". However, there is no universally agreed definition of what a tax haven is. Consequently, no officially recognized list of countries can be used as an objective reference to characterize presence in "tax havens".

The OECD, as well as France and the European Union, have issued black lists of non-cooperative countries, which are periodically revised. The OECD, EU and French black lists available at the end of 2023<sup>(1)</sup> include the following jurisdictions : Anguilla, British Virgin Islands, Seychelles, Panama, Vanuatu, Fiji, Guam, U.S. Virgin Islands, Palau, American Samoa, Samoa, Trinidad and Tobago, Bahamas, Turks and Caicos Islands, Antigua and Barbuda, Belize, Russia.

At the end of 2023, TotalEnergies' consolidated affiliates had presence

in three of the OECD, EU or French black listed jurisdictions :

- in Panama : Colon LNG Marketing (50% held) markets and sells liquefied natural gas (LNG) in Central America;
- in Fidji : TotalEnergies marketing Ltd (100% held) owns and operates a service stations network in Fiji;
- in Russia : for details on the situation in Russia, please refer to the information provided in the Company's URD and press releases.

Besides, the EU publishes a "grey list" of countries that are under scrutiny for not meeting certain tax standards but have committed to changing their practices. As required by the EU Public CbCR rules, the Company's CbCR published in Chapter 4 reports presence in these countries.

(1) EU list adopted on October 17, 2023 and French list adopted on February 3, 2023.





**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

### More transparency on our countries of operation worldwide

We are aware that our stakeholders may have a broader view of controversial jurisdictions from a tax standpoint, and therefore have broader expectations. Actually, various jurisdictions outside of these black lists may be viewed as controversial for various reasons, e.g., their low or zero corporate income tax rate, their alleged lack of transparency, their tax treaty network or the importance of the financial flows transiting by entities incorporated in such countries.

Therefore, acting on its commitment to transparency, TotalEnergies has first decided as early as in 2015 to proactively publish every year the full list of its consolidated entities in its Universal Registration Document, together with their countries of incorporation and of operations (see Chapter 8 of our URD) and consistently responds to stakeholders who raise questions on such issues.

This tax transparency report discloses additional data on TotalEnergies' presence and operations in its main countries of operations, including key indicators of substance, profitability and taxes incurred on a per country basis. As far as controversial countries are concerned, this voluntary disclosure covers not only listed non cooperative countries, but also Bermuda where we have presence in 2023. Further to the migration of our last affiliate from the Cayman Islands to France in 2023, there is no more presence to report in the Cayman Islands on December 31, 2023.





**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023



# Why are we present in jurisdictions subject to tax controversy?

Contextual information is key to understand each specific situation.

## Being incorporated in a low-tax jurisdiction does not necessarily bring tax savings

Contrary to widespread opinion, using an entity incorporated in a low tax jurisdiction does not necessarily trigger tax savings. In many situations, the income derived by this entity is indeed subject to tax in the country of its parent company or in its country of activity.

#### Taxation in the parent company's country

This has been the case for all TotalEnergies' entities between 1965 and the end of 2010. During this period, the Company was subject to a worldwide tax consolidation system in France. According to this regime, repealed in 2010, the income of all the Company's affiliates<sup>(1)</sup> was subject to corporate income tax in France at the standard rate of 33.33% (50% until 1985).

These entities were also subject to audits by the French tax administration, under the same conditions as French incorporated entities. Because all profits were ultimately taxed in France under French tax rules, any low tax effect of a geographical presence was annulled. Today, TotalEnergies remains subject to tax in France on the income of all its controlled foreign affiliates benefitting from a privileged tax regime<sup>(2)</sup>, unless such affiliates have a genuine business purpose and an appropriate level of substance locally.

Using an entity incorporated in a low tax country as well as directing financial flows towards such entity, may even trigger additional tax costs (through increased withholding taxes and/or the non tax deductibility of such flows), due to the application of a variety of anti-abuse provisions.

#### Taxation in the country of activity

For a number of reasons developed hereafter, TotalEnergies may also hold entities which have their statutory seat in one country (France, the Netherlands, Bermuda ...) while performing their entire activity in another country (e.g., operation of an oil field or a liquefaction plant). According to all internationally recognized tax rules, the profits of these entities are fully taxable in their country of operations. As we do not locate any revenue in the country of their legal seat, this type of structure does not create any corporate tax benefit.

<sup>(2)</sup> According to articles 209 B and 238 A of the French Tax Code, a privileged tax regime is a tax regime resulting in an effective corporate tax burden of less than 60% of the French tax liability.



<sup>(1)</sup> At least 10% held in the oil and gas branch and 50%, in all other branches.

**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

### Then why incorporate entities in such controversial countries?

There are many legitimate reasons that explain the presence of an entity in a country questioned for its tax system.

The first one is obviously performing industrial and/ or commercial activities on the territory of such country (see above in Panama and Fiji).

Another important non-tax reason is the possibility to hold financial statements in US dollars. This is critical in the oil and gas industry, which operates, trades and is funded in US dollars. Incorporating project companies in a country where US dollar accounting is permitted (which is regrettably not possible in France while authorized in countries such as the Netherlands or Bermuda) is therefore useful to mitigate our foreign exchange exposure.

The legal framework of the country of incorporation is another element to consider in the decision on the place of incorporation. Investment protection, legal and tax certainty, property security law, etc., are of particular importance when a major project financing involving several lenders from different countries is put in place.

Finally, some of our affiliates may result from acquisitions of assets or of groups of companies. In this case, the Company inherits the structure put in place by the seller. We may also hold a minority interest in a joint venture with other partners, in which we are not in a



position to impose a decision on the place of incorporation of the JV.

## TotalEnergies commitment

Consistent with its tax policy, TotalEnergies structures its investments according to its business operations and the regulatory framework. The Company believes that artificial or aggressive tax planning mostly derives short term tax benefits and is not compatible with a sustainable approach.

Unless it is to perform genuine business activities, the Company's long-term commitment is to not create affiliates in countries generally acknowledged as tax havens, and to repatriate or liquidate existing affiliates where feasible.

In 2023, our last consolidated entity in the Cayman Islands, TEP Waha, was repatriated to France. Since 2012, TotalEnergies has liquidated or transferred 27 consolidated affiliates out of controversial jurisdictions (Bermuda, Bahamas, Cayman Islands and British Virgin Islands).

Where affiliates have been transferred, this has been either to France or to other European countries allowing USD accounting, such as the Netherlands.

Relocation is however not always feasible. For instance, TotalEnergies may not have the legal power to decide a transfer of legal seat (e.g., in a joint venture). Such relocation may also not be legally possible in the country of incorporation of the affiliate, or jeopardize our rights in the underlying assets. Finally, in certain jurisdictions, a transfer of legal seat may be subject to the same tax consequences as a sale of the underlying assets, or as a liquidation of the entity, therefore triggering a material ungrounded tax liability (absent any actual revenue or actual transfer of property).



**02** Our approach to tax **03** Our Total Tax Contribution 2023

04 Our Country-by-Country Tax Report 2023

os Our Extractive Industries Reports 2023 Iands 023 <sup>(1)</sup>

#### **The Netherlands**

#### Key figures 2023<sup>(1)</sup>

Revenue: <b>\$4,455M</b>	Employees: 1,760
Profit before tax: \$594M	CIT accrued: <b>\$168M</b>

TotalEnergies has been present in the Netherlands for more than 50 years and operates locally in all business segments of the energy industry. In the Netherlands, the Company is a a major player in the refining, offshore gas and new mobility sectors. It leads several environmental and community outreach initiatives in the country. The various affiliates incorporated in the Netherlands rely on a well-established technical base and on the possibility to hold their statutory accounts in US Dollars.

Luxembourg Key figures 2023 <sup>(1)</sup>	
Revenue: <b>\$2,105M</b>	Employees: 529
Profit before tax: <b>\$85M</b>	CIT accrued: \$22M

In 2023 TotalEnergies owns and operates approximately 44 service stations.





Our presence in...

At the end of 2022, TotalEnergies owned 1 consolidated affiliate incorporated in the Cayman Islands, TEP Waha, which was acquired in 2018 from a third party. This entity performed upstream operations in Libya. All its revenues were subject to tax in Libya according to the local tax legislation. Its headoffice in the Cayman Islands had no revenue. The seat of this company was migrated to France in 2023.



TotalEnergies owns 6 consolidated affiliates incorporated in Bermuda (out of which 5 are less than 50% held). For a long time, Bermuda was one of the rare places that allowed USD accounting. It also offers a stable and secured legal framework adapted to project financing of large and capital-intensive infrastructure projects. All were formed before 2010, and therefore subject to corporate income tax in France under the French worldwide tax consolidation regime at the time of their incorporation. Today, absent any income derived or located in Bermuda, TotalEnergies derives no tax benefit from this incorporation in Bermuda (all profits are taxable in the countries where they are derived).



petroleum and petrochemical products to its business customers. The AS24, affiliate with its dedicated service stations for long-haul truckers, is active in the country via a network of partner service stations. pe

TotalEnergies also has its captive insurance company, Pan Insurance DAC, which is regulated by the Central Bank of Ireland. This entity's profits are subject to tax in France, under French Controlled Foreign Company rules. In Malta, Hutchinson operates a seal manufacturing plant. The Company also supplies our business customers with sealing solutions designed by Hutchinson. Last, TotalEnergies retails lubricants and petrochemicals in the country. In Cyprus, TotalEnergies operates two offshore exploration blocks (gas) and holds interests in several others. The Company also retails specialty and petrochemical products to its business customers.

Also, Saft has a regional office in Cyprus for carrying out sales activities.





**03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## Our View on certain Key Tax Matters

On transfer pricing	30
On territoriality of taxation	31
On the "Pillar 2" global minimum tax	32
On tax incentives	33
On public policy and advocacy	35





**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

### On transfer pricing

A transfer price is the price set for the sale of goods or services between entities of the same group (also called "related parties").

In the definition of its transfer prices, TotalEnergies applies the internationally recognized arm's length principle and refers to the OECD transfer pricing guidelines for multinational enterprises and tax administrations, as incorporated in the applicable local tax laws.

Our transfer pricing methods are described in our transfer pricing documentation in compliance with applicable laws and regulations, and are subject to audit by the tax authorities of our host countries.

#### **OUR TRANSFER PRICING POLICY**

In compliance with the transfer pricing regulations in the countries where it operates, TotalEnergies prepares a comprehensive and consistent transfer pricing documentation that includes :

- a master file that provides an overview of the Company's global business, organizational structure, transfer pricing policies, and economic activities;
- local files that provide detailed information on the transactions and transfer prices of each TotalEnergies entity, with an economic and functional analysis used to support the arm's length character of the pricing.

The transfer pricing documentation is updated yearly to reflect any changes in the business or the market conditions. It is submitted to the tax authorities upon request, or filed each year depending on the regulation.

Most of our intragroup sales of goods relate to products quoted on international markets (e.g. crude oil, refined products, electricity, natural gas...). Our transfer prices are thus referring to independent market quotations. Prices of our intragroup services (technical assistance or intragroup financing) are also set in compliance with internationally recognized standards.

Transfer pricing methods are applied consistently all across the Company (i.e. the same pricing methods for the same transactions in all countries) and do not result in any profit shifting to low-tax jurisdictions.

Our affiliates in the refining or distribution segments (i.e. service station entities in our Marketing & Services branch, as well as affiliates distributing electricity or natural gas to end consumers in our Gas Renewable and Power branch) cannot have access to supplies produced by related parties at no or at low cost (crude oil, refined products, electricity or natural gas). Free or low priced supplies could be illegal and would in any case be contrary to transfer pricing principles. In compliance with applicable laws and regulations, all our affiliates buy their supplies at market price, whether or not such supplies are produced by a related entity.

In this respect, contrary to common belief, TotalEnergies refining and marketing entities do not predominantly refine, transform or sell products sourced from Company suppliers. The crude oil refined in our refineries is mostly acquired on the international markets and our crude oil produced is mostly sold on the international markets.

For this reason, in case of high energy prices like in 2022, the additional profits derived are mainly generated and taxed in the countries of production and not in the countries of consumers. The evolution of the taxes we pay worldwide is in line with the evolution of oil and gas prices : the Company accrued close to \$25 billion in profit and production taxes in 2023, compared to more than \$30 billion in 2022, due to lower prices in 2023.

**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

## On territoriality of taxation

According to a generally acknowledged tax principle, guaranteed by international tax treaties, a profit should not be taxed twice by two different countries. Avoidance of double taxation can be implemented through two systems:

- Territorial tax regimes provide that only profits derived in one country may be taxable in that country. Consequently, profits derived from abroad are exempt and are subject to tax only in the countries where they are generated;
- Worldwide taxation regimes on the contrary provide that both domestic and foreign source income can be taxed in one country. In this case however, to eliminate double taxation, income taxes paid abroad are creditable against the income tax liability accrued by the parent company.

France, where the Company has its head office, follows the territorial system. As a consequence, as TotalEnergies' profits are generally derived outside of France, they are mainly subject to tax abroad, in the countries where they are generated, often at rates above standard (e.g., 78% in Norway, 50% in Angola, 50 to 80% in Nigeria). See Chapter 5, for further detail on where the Company pays taxes on profits and production worldwide.



A tax treaty is an international agreement, sovereignly negotiated by two States, with a view to avoid double taxation and prevent tax evasion by defining the taxing rights of each country. Consistent with their objective to avoid or limit double taxation of revenues that are already taxed in the hands of the recipient, tax treaties often provide for a reduction or an exemption of withholding taxes on dividends, interests and royalties in the country of source of such revenues.

The benefit of such withholding tax reductions is sometimes viewed as tax optimization which would deprive the States of source of their fair share of tax ("treaty shopping").

Most tax treaties include strict anti-abuse clauses that preclude the application of the favorable treaty provisions in case of artificial or tax driven schemes. Except in these situations of abuse, the benefit of tax treaties is legitimate.

TotalEnergies does not engage in aggressive tax optimization schemes or tax treaty abuse.



**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

### On the "Pillar 2" global minimum tax

On July 10, 2021, the G20 endorsed the key components of the "Pillar 2 international tax reform". The agreement was reached by more than 130 jurisdictions referred to as the Inclusive Framework on Base Erosion and Profit Shifting (BEPS).

The Pillar 2 framework aims to ensure that large multinational enterprses pay a minimum 15% effective tax rate on income within each jurisdiction in which they operate<sup>(1)</sup>. Groups with an effective tax rate below the minimum in any particular jurisdiction, would be required to pay an additional tax (top-up tax) in the country of their head office or in the "low tax" country.

The 27 EU Member States adopted the Pillar 2 rules in a Directive dated December 15, 2022. This Directive was transposed in France in 2023.

As a consequence, as of January 1, 2024, TotalEnergies is subject to a minimum effective tax rate of 15% in each of its countries of operations. Given the high tax rates in its operating countries and the anticipated legislative and regulatory changes in some host countries, the Company does not expect the application of this minimum tax to result in the payment of additional tax in France.

(1) The ETR computed for Pillar 2 purposes is based on accrued and deferred profit taxes, and cannot therefore be reconciled with CbCR data as the latter only includes accrued CIT. The Company recommends a transparent and harmonised implementation of the reform. However, its rules are highly complex to implement both for companies and for tax administrations. With a view to encourage a fair and consistent global tax system. TotalEnergies supports any efforts to simplify the rules and introduce safe harbour provisions that would reduce the administrative burden and the risk of disputes. We believe that this would benefit both taxpayers and tax authorities in the long run.

#### **OUR EFFECTIVE TAX RATE (ETR)**

Our effective tax rate (ETR) is determined herein as the total consolidated accrued and deferred corporate income tax charge divided by the consolidated income before tax, as per our consolidated financial statements.

#### At Company level

TotalEnergies's ETR was 38.2% in 2023. The ETR decrease in 2023 compared to 2022 (51.4%) is mainly due to the lower oil and gas prices. These ETRs are substantially higher than the global average ETR (23.7% in 2023, per the OECD Corporate Tax Statistics published in July 2024).

#### At country level

The aggregate effective tax rate of our activities in certain countries may be materially higher or lower than the statutory rate. It may also be negative in some instances.

An ETR higher than the country's statutory rate is in most cases due to higher tax rates applicable to Exploration & Production activities (e.g. 78% for activities on the continental shelf in Norway or 50% for offshore production sharing contracts in Angola). It may also result from the absence of tax consolidation in the country.

A lower ETR, on the contrary, is mainly due to the carry forward of tax losses or in some instances to accelerated tax depreciation of assets. Finally, negative ETRs may happen when the aggregate income of affiliates in one country is a loss, while some entities are profitable and incur a corporate income tax charge.



**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023



### On tax incentives

TotalEnergies' projects are long term, capital intensive and high-risk investments. The Company may claim tax incentives offered by government authorities to foster investment, employment and economic development.

TotalEnergies only claims tax incentives which are aligned with its business strategy and which relate to investments with economic substance.

Should a tax incentive be claimed, the Company strictly complies with all the statutory or regulatory requirements, in terms of capital investment or employment creation for instance.

#### FUNDING TRANSITION

COP28 president Sultan AI Jaber praised the progress made in Dubai but reiterated in February 2024 that the cost of the energy transition will be substantial : "we need to think in terms of trillions, not billions". According to the estimates of the IFC<sup>(1)</sup>, two-thirds of the investments in low-carbon energies in emerging and developing countries (excluding China) will have to come from the private sector, i.e. between \$0.9 and \$1.1 trillion per year, by the early 2030s.

Tax incentives are one of the tools that governments can use to encourage investments and support private sector funding. For instance, the Inflation Reduction Act (IRA) in the United States introduced several new and extended tax credits designed to spark private investment in clean energy, transport, and manufacturing. Incentives vary from tax credits directly to producers of certain equipment, to incentives for taxpayers to buy equipment from American producers. In its effort towards carrying out its energy transition, TotalEnergies capitalizes on that legislation for a faster rollout of operations connected with renewable energies, in line with its tax policy.

(1) See the report « Scaling up private finance for clean energy in emerging and developing economies » of June 2023 on ifc.org.

In most cases, TotalEnergies seeks incentives provided by law and available to all investors. In some cases however, tax incentives may be provided in contracts. In its effort to contribute to the public disclosure of contracts and licenses, the Company encourages governments to publish fiscal the terms of such contracts. TotalEnergies was actually the first Major company to support contract transparency in February 2018 at the international board meeting of the Extractive Industries Transparency Initiative (EITI).

The type of tax incentives available to TotalEnergies depends on the type of investments.

In oil & gas projects, tax incentives are for instance typically granted during the exploration and development phases when the Company derives no income (e.g., longer carry forward period for losses, accelerated depreciation).



**02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

Renewable energy projects may also benefit from specific accelerated depreciation or tax credits, which are an incentive for investment in energy efficiency and for the development of decarbonized energy.

When assessing the cost of a tax incentive for a State's budget, or its benefit for a company, all parameters in relation with this incentive must be taken into account.

In the upstream sector for instance, tax incentives must be weighed against higher corporate tax rates that are generally applicable on profits compared to the standard tax regime.

Besides, many parameters (such as the oil/gas prices, interest rates and the evolution of the assets' portfolio in the country) may affect the effective impact of a tax incentive. Also, the Pillar 2 GloBE rules, which aim at ensuring that a minimum 15% tax rate is paid by multinationals in each of their countries of operation (see chapter 2 p 32), recapture the benefits of certain tax incentives.

Finally, beyond tax, the overall economic impact of the incentivized projects, including indirect benefits on employment and economic development, should be taken into account.





### On public policy and advocacy

TotalEnergies follows the rules set forth under its Code of Conduct and its Advocacy Directive (which are both available on the Company website). The Company is committed to fighting against any form of corruption, refuses to intervene in the functioning and the funding of the political life of host countries, respects the principle of free competition, undertakes to convey messages to the authorities that are consistent with its stated positions and be transparent about such messages, whether they are positive or defensive, notably with regard to the Company's support for the objectives of the Paris Agreement relating to the fight against climate change. Also, the Company undertakes to publish the names of the professional associations to which it belongs and ensures the consistency between its positions stated publicly and those conveyed through its advocacy efforts, whether directly or indirectly through professional associations, particularly with regard to the Company's support for the objectives of the Paris Agreement.

TotalEnergies fully supports initiatives for greater transparency and accountability. It has been a permanent member of the Board of the Extractive Industries Transparency Initiative (EITI) since its creation in 2003. More recently, the Company endorsed the Responsible Tax Principles developed by the B Team, a non-profit organization bringing together business leaders and representatives of civil society with the aim of promoting a sustainable form of economic and social development.

As from December 2023, the TotalEnergies corporate website details the list of advocacy efforts carried out by the Company in France, Europe and the US, with the expenditures related thereto, as well as the list of professional associations of which the Company is a member, our Advocacy Directive and the general principles that govern our advocacy efforts.



#### **ADVOCACY AND TAX MATTERS**

As for tax matters, TotalEnergies generally supports fair, stable and predictable tax systems. With this objective, our Company regularly engages with tax authorities or international tax policy makers in a professional and transparent manner, either directly or through industry organizations.

In line with its carbon neutrality objective, the Company supports carbon pricing policies and the European Union's carbon border adjustment mechanism as part of the EU's trading emissions system.







## Our Total Tax Contribution 2023

What is the Total Tax Contribution (TTC)?	37
Our TTC at a glance	38
Our TTC in 2023	39



**01** TotalEnergies at a glance **02** Our approach to tax **03** Our Total Tax Contribution 2023

**04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

# What is the Total Tax Contribution?

The Total Tax Contribution is a measure of all the taxes that a company pays, whether borne or collected. Tax payments of TotalEnergies represent a substantial part of our Company's economic contribution to the countries in which we operate. Mindful of its responsibility, our Company is committed to paying its fair share of taxes to the host countries of its operations.

Consistent with the Global Reporting Initiative on tax (GRI 207) and the World Economic Forum report Measuring Stakeholder Capitalism of September 2020, reporting of total tax paid, provides meaningful information on the company's contribution to governmental revenues through the different forms of taxation imposed on it.

# Why publish a Total Tax Contribution

It provides a more complete and accurate information than focusing only on corporate income tax, which represents on average around 16% of the total tax revenues of countries according to the 5th edition of the Corporate Tax Statistics report published by the OECD in July 2024. This is especially relevant in the energy industry, where a substantial part of the taxes borne by companies is composed of taxes other than corporate income tax.

# What are the different elements of the Total Tax Contribution?

## Taxes borne versus Taxes collected

The Total Tax Contribution includes both taxes borne and taxes collected. The taxes borne are a direct cost for the company. Taxes collected are levied by a company and discharged to the governments, but they are a final cost for others, such as employment tax collected from employees, excise duties collected from customers or withholding tax collected from suppliers and shareholders.

### Scope

The Total Tax Contribution aggregates taxes borne and collected by all our fully consolidated entities.

# **TTC Glossary**

# **Profit taxes**

According to tax standards, (e.g., definitions provided by the OECD), profit taxes generally include taxes levied on net profits (i.e., gross income minus allowable tax reliefs). However, the application of the IFRS accounting standards guidance may lead to a different classification in the Company's Financial Statements. In this report, for the sake of consistency, we have applied the same classification as in our Financial Statements.

### Production taxes

Production taxes include taxes on the production of oil, gas and electricity. Consistent with the above developments on profit taxes, we have applied in the present report the same classification of production taxes as in our Financial Statements, following the IFRS standards' guidance.

### Employment taxes

Employment taxes include all taxes and social contributions in relation to the employment of staff. This covers both employment taxes and contributions which are borne by the Company and those which are the cost of the employee and collected by TotalEnergies through the payroll.

### Sales taxes

Sales taxes, excise duties and other product taxes are levied on the sale of goods and services. These are very significant for TotalEnergies because we collect taxes from our customers as they purchase energy by way of value added tax and excise duties.

### Other taxes

Other taxes include all the other types of taxes, such as withholding tax on dividends paid to Company shareholders, taxes on property transactions and ownership, insurance...



02 to tax

03 Our Total Tax Contribution 2023

04 Country Tax Report 05 2023

# **Our TTC at a glance**

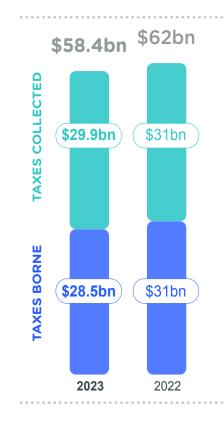
SCOPE OF REPORTING : This chapter details the Total Tax Contribution of our fully consolidated entities in our countries of operations in 2023.

# Cash tax payments versus accrued tax charge

Taxes are reported on a cash basis to the extent feasible, i.e., at the time taxes are paid out and tax refunds received.

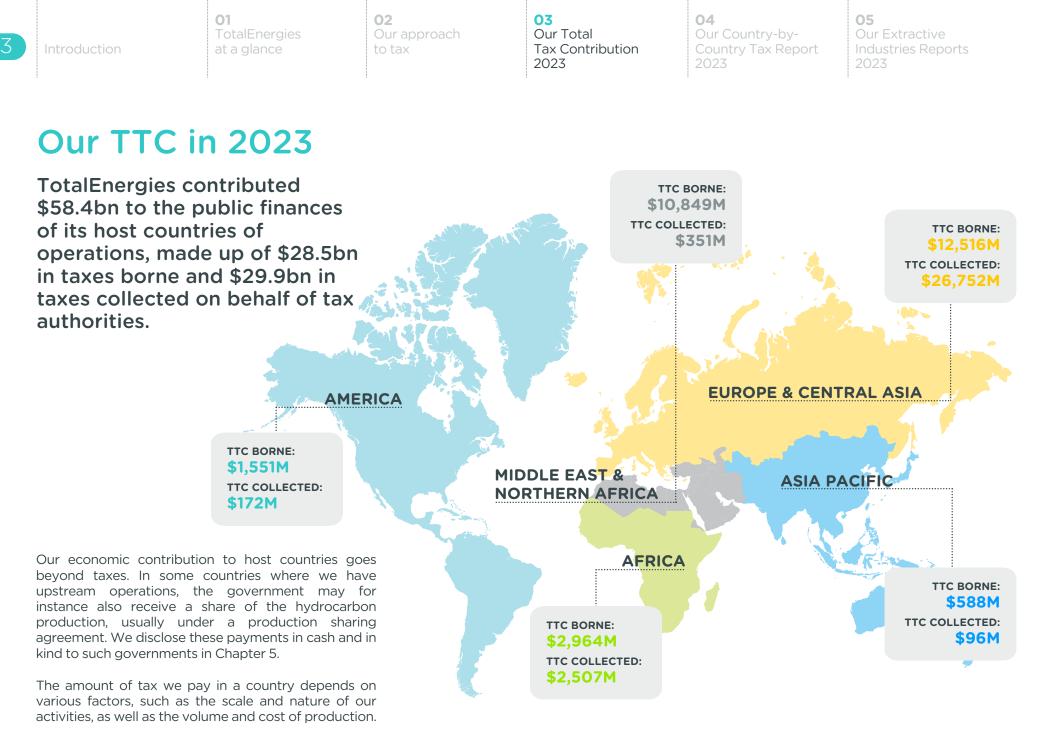
Profits declined between 2023 and 2022 due to the decrease in energy prices, thus causing a decrease in accrued corporate income tax amounts.

### Sales Taxes Excise duties collected Profit Taxes Production Taxes collected 8.6 12.8 11.4 18.2 Total \$28.5bn \$29.9bn \$58.4bn TTC TTC Collected Borne Other Taxes Employment Other Taxes collected Taxes borne 3.1 2.4 1.9



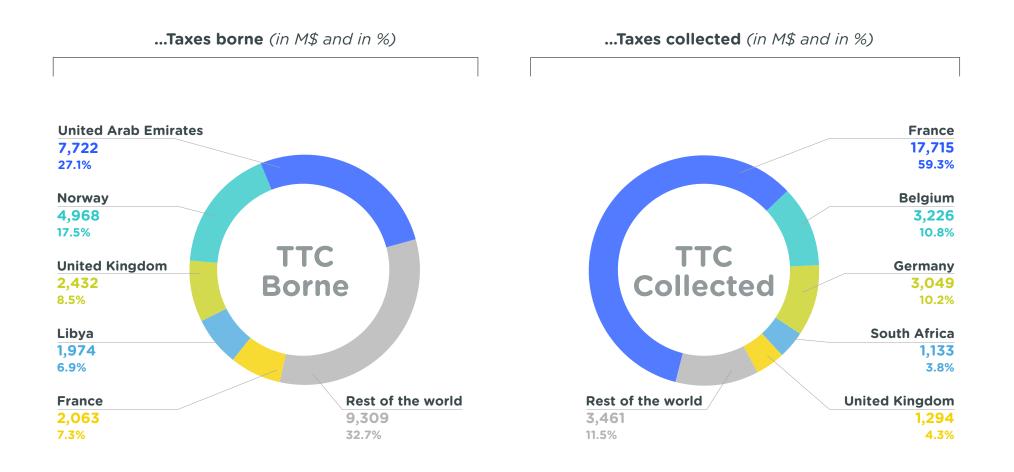
# Tax Transparency Report 2023

# Total tax contribution 2023 (in \$bn)



**03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

# The top five countries in terms of...







# Our Countryby-Country Tax Report 2023

Our Country-by-Country Tax Report 2023	42
Reconciliation of the 2023 corporate income tax information presented in the Universal Registration	
Document and the Country-by-Country Report (in M\$)	50



**01** TotalEnergies at a glance **02** Our approach to tax **03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

# Our Country-by-Country Tax Report 2023

Since 2017, TotalEnergies prepares and files each year with the French tax authorities a Country-by-Country Reporting (CbCR) with aggregate data per country on profit, corporate income tax paid and accrued and key indicators of economic activity.

This CbCR tax return covers all entities over which TotalEnergies has control, whether or not they are part of the consolidated group and irrespective of their activity (i.e. extractive or not). It represents more than 1,900 entities in close to 130 jurisdictions.

This reporting is prepared in compliance with the French statutory requirements and with the guidance on the implementation of CbCR published by the OECD. Regulation requires to include data for the non-consolidated entities we control. Equity affiliates are consequently out of scope. CbCR rules also require numerous adjustments to the source data which comes from our IFRS consolidated financial statements. Consistent with the time needed to secure this process, the regulation provides that the CbCR return is filed in December of the following year. Finally, in order to provide a reliable and verified information to the public, our CbCR data is reconciled with our consolidated financial



statements and subject to third party assurance by our external auditors.

# **Beyond mandatory disclosure rules**

The CbCR filed in France is currently not public, in compliance with the OECD guidelines and article 223 quinquies C of the French tax code.

The EU Directive on public CbCR (Directive n°2021/2101 of November 2021) provides for the compulsory disclosure of the CbCR data relating to activities conducted in the EU Member States and in the countries included in a so-called "black list" of non cooperative jurisdictions and in a "grey list" for at least two years. Further to its transposition in France in 2023, this Directive will be effective as of tax year 2025.

TotalEnergies goes beyond this future obligation in its tax transparency report since 2019. It voluntarily publishes its CbCR data for the countries required by the EU Directive<sup>(1)</sup>. In addition, capitalizing on its long-standing transparency practice in the extractive industry, TotalEnergies also discloses its CbCR data relating to all countries in which it reports payments to governments from its extractive affiliates. For those countries, the data relating to all activities is disclosed (whether or not extractive).

Altogether, in 2023, this information covers more than 94% of the Company's corporate income tax paid and close to 91% of its corporate income tax accrued.

The Company also decided to add information relating to Bermuda, where it has presence in 2023. We also included information on the Cayman Islands, although the last Company affiliate in the Cayman Islands was migrated to France in 2023. Consequently, there is no more presence to report in the Cayman Islands on December 31, 2023.



<sup>(1)</sup> As required by the EU Directive on Public CbCR, the Company referred to the EU black and grey lists of Non Cooperative Countries available in March 2023 and March 2022. TotalEnergies thus assessed reportable presence in the following countries:

black listed countries: Fiji, Russia ;

<sup>•</sup> grey listed countries for at least 2 years: Botswana, Hong Kong, Israel, Jordan, Malaysia, Qatar, Thailand, Turkey and Vietnam.

02 to tax

03 Tax Contribution 2023

04 Our Country-by-Country Tax Report 2023

05 2023

# CbCR Glossarv

### Stated capital and accumulated earnings

The CbCR template shows the amount invested in a company as share-capital and the amount of earnings (or losses) accrued over time. These totals are aggregated so the stated capital and accumulated earnings invested through a sequence of companies can be counted more than once.

In the case of an entity having its head office incorporated in one country while its operations are carried out in another country, through a branch or a permanent establishment, stated capital and accumulated earnings of the branch are reported in the country of the head office, in compliance with CbCR regulation.

### Revenue -

The CbCR template contains revenues split in two categories:

- third-party revenues: which are revenues generated from transactions with independent parties: and
- related party revenues: which are revenues generated from transactions with affiliates of the Company.

### Tangible Assets

The CbCR template provides a total of infrastructure investments in each country. This represents property, plant and machinery in the country but does not include any intangible assets.

### Corporate income tax (CIT) paid and accrued

As detailed above, the classification of profit taxes applied in the present report follows the presentation applied in our Financial Statements.

The CbCR template includes two CIT amounts that may be significantly different: CIT paid (in cash or in hydrocarbon during the year) and CIT accrued. which both rely on adjusted data from consolidated financial statements.

CIT accrued reflects the CIT liability determined to be payable (recoverable) in respect of the taxable income (loss) for the current year.

CIT paid is made of the variation of CIT liability between the closing date of year N and year (N-1). It differs from CIT accrued, due to the fact that CIT paid is mainly assessed on prior years' income, while CIT accrued is assessed on current vear income.

None of them include deferred taxes. As a result, the ratio of the profit before tax divided by the current tax liability does not reflect the actual effective tax rate for the country as per GloBE Pillar 2 rules.

Interest and royalties' withholding taxes are reported in the CIT of the jurisdiction of the recipient, whereas dividend withholding taxes are reported in the CIT of the jurisdiction of the payor.

## Profit before tax

Profit before tax is based on TotalEnergies consolidated financial statements or individual financial statements for non-consolidated entities. This is different from the profit used for the corporate income tax calculation which needs to be adjusted in accordance with the tax legislation in effect in the relevant country.

The profit included in the CbCR template can thus vary significantly from the taxable income driving corporate income taxes paid in each country.

### Employees

The number of employees provides an indicator of activity within the country.

In case of personnel seconded from one country to another, employees are reported in their country of secondment (i.e. where they actually work).

The number of employees reported does not include personnel of our subcontractors.

Not all activities are equally capital and labour intensive. For instance, in the Exploration and Production segment of activity, assets operated by our partners require less personnel than assets operated by TotalEnergies.



**03** Our Total Tax Contribution 2023



**05** Our Extractive Industries Reports 2023

2023

SCOPE OF REPORTING : it includes all controlled entities, whether or not they are consolidated. Investments accounted for under the equity method are out of scope.

Activities <sup>(1)</sup>	Third party revenue	Related party revenue	Total revenue		income taxes paid/	Corporate income taxes accrued	Stated capital			Tangible assets	Comments
MS	226,899	1,305	228,204	6,128	2,152	1,422	863	4,019	52	2,882	
GRP - MS - RC	17,048,869	20,568,758	37,617,627	863,964	314,405	299,617	6,280,277	6,316,847	5,121	3,158,038	
EP - MS	31,867	1,454	33,321	-52,220	403	415	556	0	33	49	
MS	8,831	0	8,831	1,120	463	202	86	918	3	115	
EP - GRP	0	0	0	-7,133	191	191	0	0	11	187,857	Absence of tax consolidation between the various entities.
GRP - MS - RC	878,276	22,608	900,884	10,219	3,297	1,360	11,855	1,342	1,372	61,956	
EP - MS - SCC	94,668	1,035,742	1,130,410	456,951	128,210	132,690	71,349	3,825,334	1,182	2,367,557	
MS	22,603	1,866	24,469	1,113	224	226	216	31	4	1	
EP - GRP - MS - RC - OT - SCC	58,304,919	68,140,446	126,445,365	-4,379,405*	-162,534**	138,620*	66,461,692	67,457,141	37,139	9,765,980	<ul> <li>* The reported loss pertains to non-tax deductible items arising from differences between accounting standards and tax regulations. The French taxable income was positive, resulting in an accrued corporate tax expense of \$139M.</li> <li>** CIT instalments paid exceeded the final tax liability, thus resulting in a refund of tax overpaid.</li> </ul>
EP - GRP - MS - RC	21,207,080	23,317,994	44,525,075	2,870,163	579,461	1,035,138	1,044,673	4,409,464	4,276	1,099,497	Coexistence of separate tax consolidation groups, with no global consolidation. See also Glossary explanations on why CIT paid and CIT accrued differ.
EP - MS	64,104	5,899	70,003	11,957	868	3,613	52,968	86,906	95	319,408	
MS	147,032	1,121	148,153	6,164	354	610	1,716	3,082	47	12,387	
MS - SCC	4,433	1,673	6,106	4,043	612	498	33,152	29,429	0	0	
	MS GRP - MS - RC EP - MS GRP - MS GRP - MS - RC EP - MS - SCC MS EP - GRP - MS - RC - OT - SCC	Activities <sup>(*)</sup> party revenue           MS         226,899           GRP-MS         17,048,869           EP-MS         31,867           MS         8,831           EP-GRP         0           GRP-MS         878,276           GRP-MS         94,668           EP-GRP         94,668           SCC         94,668           MS         58,304,919           EP-GRP         58,304,919           EP-GRP         58,304,919           EP-GRP         21,207,080           EP-MS - RC         64,104           MS         64,104	Activities <sup>(1)</sup> party revenue         party revenue           MS         226,899         1,305           GRP-MS- RC         17,048,869         20,568,758           GRP-MS         31,867         1,454           MS         8,831         00           EP-GRP         0         0           GRP-MS- RC         878,276         22,608           EP-MS- SCC         94,668         1,035,742           FP-SCRP MS-RC         58,304,919         68,140,446           OT-SCC         58,304,919         68,140,446           EP-GRP- MS-RC         21,207,080         23,317,994           EP-MS         64,104         5,899           MS         64,104         5,899	Activities <sup>00</sup> party revenue         party revenue         party revenue         party revenue           MS         226,899         1,305         228,204           GRP-MS- RC         17,048,869         20,568,758         37,617,627           GRP-MS         31,867         1,454         33,321           MS         8,831         0         8,831           EP-GRP         0         0         0           GRP-MS- RC         878,276         22,608         900,884           EP-GRP         94,668         1,035,742         1,130,410           FP-MS- SCC         94,668         1,035,742         1,130,410           MS         22,603         1,866         24,469           MS - SCC         94,668         1,035,742         1,130,410           FP-MS- SCC         58,304,919         68,140,446         1,26,445,365           MS - SCC         58,304,919         68,140,446         1,26,445,365           MS - SCC         21,207,080         23,317,994         44,525,075           EP - MS         64,104         5,899         70,003           EP - MS         64,104         5,899         70,003	Activities"party revenueTotal revenue(loss) before taxMS226,8991,305228,2046,128GRP - MS RC17,048,86920,568,75837,617,627863,964EP - MS31,8671,45433,321-52,220MS8,83108,8311,120EP - GRP0000-7,133GRP - MS RC878,27622,608900,88410,219EP - MS SCC94,6681,035,7421,130,410456,951EP - GRP MS - RCC OT - SCC58,304,91968,140,446126,445,365-4,379,405*EP - GRP MS - RC OT - SCC21,207,08023,317,99444,525,0752,870,163EP - MS MS - RC64,1045,89970,00311,957MS147,0321,121148,1536,164	Activities"Third party revenueRelated party revenueTotal revenueProfit taxes paid/ (loss)income taxes paid/ (refunded)Activities"226,8991,305228,20466,1282,152GRP-MS RC17,048,86920,568,75837,617,627863,964314,405EP-MS31,8671,45433,321-52,220403MS8,83108,831-52,220403EP-GRP SCC878,27622,608900,88410,2193,297EP-MS- SCC94,6681,035,7421,130,4104456,951128,210MS22,6031,86624,4691,113224EP-GRP- MS-RCC58,304,91968,140,446126,445,3654,379,405*-162,534**EP-GRP- MS-RC21,207,08023,317,99444,525,0752,870,163579,461EP-MS64,1045,89970,00311,957868MS147,0321,121148,1536,164354	Activitiesparty revenueparty revenueTotal revenue(loss)taxes party (refunded)taxes accruedActivities226,8991,305228,2046,1282,1521,422GRP-MS RC17,048,86920,568,75837,617,627863,964314,405299,617EP-MS31,8671,45433,321-52,220403415MS8,83108,8311,120463202EP-GRP000-7,133191191GRP-MS RC878,27622,608900,88410,2193,2971,360EP-MS SCC94,6681,035,7421,130,410456,951128,210132,690MS22,6031,86624,4691,113224226MS22,6031,86624,4691,113224226MS22,6031,86624,4691,113224226MS22,6031,86624,4691,113224226MS22,6031,86624,4691,113224226MS22,6031,86624,4691,113244266MS22,6031,86624,4691,113244266MS22,6031,86624,4691,113244264EP-GRP MS-RC21,207,08023,317,9944,525,0752,870,163579,4611,035,138EP-MS64,1045,89970,00311,9578683,	ActivitiesThird party revenueRelated party revenueTotal revenueProfix (loss)income taxes paid (refunded)Stated cacredActivities226,8991,305228,2046,1282,1521,422863GRP-MS RC17,048,86920,568,75837,617,627863,964314,405299,6176,280,277EP-MS MS31,8671,45433,321-52,220403415556MS8,83108,8311,120463202863EP-GRP000-7,1331911910GRP-MS RC878,27622,608900,88410,2193,2971,36011,855EP-MS SCC94,6681,035,7421,130,410456,951128,210132,69071,349FP-GRP MS-RC OT-SCC58,304,91968,140,44624,4691,113224226216EP-GRP MS-RC OT-SCC58,304,91968,140,446126,445,3654,379,405*-162,534**138,620*66,461,692EP-MS MS-RC OT-SCC21,207,08023,317,99444,525,0752,870,163579,4611,035,1381,044,673EP-MS MS-RC OT-SCC64,1045,89970,00311,9578683,61352,968MS64,1045,89970,00311,9578683,61352,968MS147,0321,121148,1536,1643546101,176	Activities party Activities revenueThird party revenueRelated party revenueProfit revenueincome totom ((loss) taxes paid) (refunded)State taxes taxes accruedAccumuted capitalMS226,8991,305228,2046,1282,1521,4228634,019GRP-MS RC17,048,86920,568,75837,617,627863,964314,405299,6176,280,2776,316,847EP-MS31,8671,45433,321-52,2204034155560MS8,83108,8311,120463202866918EP-GRP000-7,13319119100GRP-MS- RC94,6681,035,7421,130,4104456,951128,21013,269071,3493,825,334EP-GRP MS-SCC94,6681,364,74126,445,36544,379,405*-162,534**138,620*66,461,69267,457,141EP-GRP- MS-RCC21,207,08023,317,99444,525,0752,870,163579,4611,035,1381,044,6734,409,464EP-MS64,1045,89970,00311,9578683,61352,96836,604EP-MS64,1045,89970,00311,9578683,61352,96886,906EP-MS64,1045,89970,00311,9578683,61352,96886,906EP-MS64,1045,89970,00311,9578683,61352,968<	Activities***Phird party revenueProfit party revenueProfit porty revenueProfit porty before taxProfit revenueProfit party before taxProfit revenueProfit party before taxProfit party before taxProfit party before taxProfit party before taxProfit party before taxProfit before taxProf	Activities**Third party revenueRelated party revenueTotal revenueProfit revenueincome icos taxes paid lossincome accruedState capitalAccumulate wenubeedNumber of maning earningsTangible assetsActivities**7048.681.305228.296.1282.1521.4228634.0195.22.882GRP-MS RC70.48.86920.568.75837.617.627863.964314.405299.6176.280.2776.316.8475.1213.158.03EP-MS RC31.8671.45433.321-52.22040341555603349MS8.83108.8311.120463202869183115EP-GR RC0007.71331911910011187.657GRP-MS SCC8678.27622.608900.8810.2193.2971.36011.8551.3421.3126.155EP-MS SCC94.6681.035.7421.30.410456.951128.210132.69071.3493.825.3341.1622.367.57GRP-MS SCC94.6681.366.7422.445.3651.61.132.242262.163.141EP-GRP MS-SCC94.6681.366.7424.4691.1132.242.262.163.141EP-GRP MS-SCC94.6681.64.5.3652.870.163579.4611.36.5.381.044.6734.409.464 <t< td=""></t<>

(1) Does not include the activities of entities outside the scope of CbCR.



**03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

# 2023

<b>Tax jurisdiction</b> (in thousand of dollars)	Activities <sup>(1)</sup>	Third party revenue	Related party revenue	Total revenue	Profit (loss) before tax	Corporate income taxes paid/ (refunded)	Corporate income taxes accrued	Stated capital	Accumulated earnings	Number of employees	Tangible assets	Comments
Italy	EP - GRP - MS - RC	799,756	340,694	1,140,450	115,033	46,529	43,556	14,112	15,115	644	1,706,827	
Lithuania	MS	39,525	0	39,525	4,276	903	1,585	3,758	1,398	46	4,159	
Luxembourg	MS	2,094,212	10,813	2,105,025	85,108	13,730	22,318	38,803	4,497	529	65,921	
Malta	RC	3	22,716	22,720	2,949	412	1,095	13	3,704	240	5,714	
Poland	MS - RC - GRP	1,170,766	98,457	1,269,222	10,078	4,752	5,558	71,973	66,971	7,725	298,721	
Portugal	MS - RC - GRP	166,776	74,622	241,399	28,892	3,453	7,712	7,475	21,046	2,266	48,412	
Romania	MS - RC - SCC	232,123	55,475	287,598	11,734	1,100	1,030	33,965	2,341	1,446	28,386	All entities are not tax consolidated.
Slovakia	MS	24,034	768	24,802	2,339	538	525	582	531	10	5,248	
Slovenia	MS	54,785	796	55,581	1,167	426	287	226	664	7	192	
Spain	GRP - MS - RC	3,251,524	801,490	4,053,014	-31,029	12,663	14,053	408,158	284,220	1,768	477,351	Book to tax difference. Absence of tax consolidation between all entities.
Sweden	GRP - MS	188,283	2,515	190,798	19,823	4,006	4,651	152	696	404	22,256	
The Netherlands	EP - GRP - MS - RC - SCC	2,989,647	1,465,104	4,454,751	593,972	167,646	168,333	28,072,424	8,551,270	1,760	617,987	
Non-cooperative j	urisdictions a	nd other cont	roversial cou	ntries								
Bermuda <sup>(2)</sup>	EP - GRP	4,000	0	4,000	-35,000	0	0	0	-188,166	0	0	
Botswana	MS	59,369	75	59,444	449	225	150	75	8,430	16	11,115	
Cayman Island <sup>(2)</sup>		0	0	0	0	0	0	0	0	0	0	The sole consolidated entity remaining in the Cayman Islands beginning of 2023 was migrated to France before year end.

(1) Does not include the activities of entities outside the scope of CbCR.

(2) Activities reported are performed by a foreign operational branch (see Chapter 2 page 26).



**03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

# 2023

<b>Tax jurisdiction</b> (in thousand of dollars)	Activities <sup>(1)</sup>	Third party revenue	Related party revenue	Total revenue	Profit (loss) before tax	Corporate income taxes paid/ (refunded)	Corporate income taxes accrued	Stated capital	Accumulated earnings	Number of employees	Tangible assets	Comments
Fiji	MS	225,452	16,136	241,588	4,930	568	1,345	2,736	16,417	95	45,604	
Hong-Kong	GRP - MS - RC	252,408	68,904	321,311	4,096	1,247	970	38,667	18,879	66	28,159	
Israel	GRP	28,581	627	29,208	23,436	4,145	4,292	15,473	15,655	368	87,024	
Jordan	MS	549,071	43,724	592,795	14	2,841	-1,396	9,874	-2,808	121	73,347	See Glossary explanations on why CIT paid and CIT accrued differ.
Malaysia	EP - GRP	0	31,892	31,892	-2,911	826	501	2,127	2,797	6	67,278	
Qatar	EP	597,000	241,000	838,000	351,000	150,160	162,000	0	0	197	790,000	
Russia	EP - GRP - MS	1,000	1,000	2,000	-1,033	1,000	994	0	0	51	2,000	
Thailand	EP - MS - RC	158,017	12,551	170,568	108,737	224,431	45,808	3,221	3,904	70	1,230	See Glossary explanations on why CIT paid and CIT accrued differ.
Turkey	MS - RC	119,247	89,272	208,519	23,104	6,978	7,296	5,027	22,574	639	10,669	
Vietnam	EP - MS - GRP	161,849	728	162,577	4,920	613	657	35,146	0	510	40,616	Reduced CIT due to the carry-forward of former tax losses.
Other countries w	ith extractive op	perations										
Algeria	EP - MS	771,666	381,068	1,152,734	334,273	155,095	152,385	2,210	18,561	189	556,252	
Angola	EP -GRP - MS	270,992	4,461,194	4,732,186	1,977,866	624,184	719,081	787,080	-601,134	1,536	7,485,429	
Argentina	EP - GRP - MS	1,396,201	12,792	1,408,993	-14,195	43,002	44,110	165,109	119,242	1,188	1,391,202	Book to tax differences.
Australia	EP - GRP - MS	1,955,302	1,126,346	3,081,648	488,629	380	-867	3,796,950	-1,487,707	110	7,925,965	All entities are not tax consolidated. Reduced CIT due to the carry-forward of former tax losses.

(1) Does not include the activities of entities outside the scope of CbCR.



**01** TotalEnergies at a glance **02** Our approach to tax

**03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023 **05** Our Extractive Industries Reports 2023

# 2023

<b>Tax jurisdiction</b> (in thousand of dollars)	Activities <sup>(1)</sup>	Third party revenue	Related party revenue	Total revenue		Corporate income taxes paid/ (refunded)	Corporate income taxes accrued	Stated capital	Accumulated earnings	Number of employees	Tangible assets	Comments
Azerbaijan	EP	112,000	61,000	173,000	5,000	0	0	0	0	30	1,415,000	
Bolivia	EP	288,000	0	288,000	64,000	0	0	0	0	146	231,000	Book to tax differences and carry-forward of former tax losses.
Brazil	EP - GRP - MS - RC	1,250,508	3,551,502	4,802,010	1,113,587	211,107	239,867	2,177,147	-282,625	3,747	10,485,804	
Brunei Darussalam	EP	122,000	33,000	155,000	65,000	66,000	41,000	0	0	104	219,000	
Canada	EP - MS - RC	3,169,919	6,586,552	9,756,471	15,437	1,039	1,000	62,066	-75,661	304	9,016	Reduced CIT due to the carry-forward of former tax losses. Divestment from the EP affiliate in November 2023.
China	EP - GRP - MS - RC	1,639,692	72,652	1,712,344	165,859	44,113	41,961	346,534	-28,336	3,914	658,778	
Democratic Republic of Congo	EP - MS	331,000	1,000	332,000	19,000	7,000	10,000	0	44,000	83	38,000	Absence of tax consolidation between the various entities in the jurisdiction.
Gabon	EP - MS	371,253	457,290	828,543	50,579	38,539	47,682	86,551	1,639,657	351	1,682,652	
Indonesia	EP - MS	47,602	750	48,352	5,027	3,000	2,151	38,035	-45,694	86	8,771	
Iraq	EP	-1,000	307,000	306,000	148,000	12,125	25,000	0	0	275	302,000	Absence of tax consolidation between the various entities in the jurisdiction.
Kazakhstan	EP - MS	108,021	1,745,950	1,853,971	328,140	18,226	13,000	21,746	-1,572	69	8,627,525	Low corporate tax due to the carry forward of tax losses.
Kenya	EP - MS - GRP	1,197,454	106,293	1,303,747	-97,745	25,275	-63,364	174,186	303,636	374	204,768	Absence of tax consolidation between the various entities in the jurisdiction.
Lebanon	EP - MS	1,183,681	1,720	1,185,402	-53,753	2,001	1,089	4,043	-58,976	234	47,000	Absence of tax consolidation between the various entities in the jurisdiction.
Libya	EP	672,000	2,038,000	2,710,000	871,000	534,000	534,000	0	0	32	647,000	

(1) Does not include the activities of entities outside the scope of CbCR.



**03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023

**05** Our Extractive Industries Reports 2023

# 2023

<b>Tax jurisdiction</b> (in thousand of dollars)	Activities <sup>(1)</sup>	Third party revenue	Related party revenue	Total revenue	Profit (loss) before tax	income taxes paid/	Corporate income taxes accrued	Stated capital	Accumulated earnings	Number of employees	Tangible assets	Comments
Mauritania	EP - MS	0	0	0	-7,000	0	0	0	0	1	0	
Mexico	EP - GRP - MS - RC	1,073,780	55,176	1,128,956	5,305	-6,887	8,244	93,405	-463,793	7,203	155,661	CIT instalments paid exceeded the final tax liability, thus resulting in a refund of tax overpaid.
Mozambique	EP - MS - GRP	314,454	16,769	331,223	-317	434	2,127	2,561,450	17,209	485	2,855,422	Book to tax differences.
Namibia	EP - MS	190,135	0	190,135	-84,680	108	217	8,254	3,693	96	355,732	Absence of tax consolidation between the various entities in the jurisdiction.
Nigeria	EP - MS	2,007,444	3,472,405	5,479,849	1,947,728	1,196,583	1,345,658	257,315	5,446,199	2,178	7,538,124	
Norway	EP - GRP - MS	1,064,211	5,927,820	6,992,031	5,192,260	4,900,681	3,831,254	413,496	4,993	98	5,490,948	See Glossary explanations on why CIT paid and CIT accrued differ.
Oman	EP - GRP	112,878	894,522	1,007,400	173,588	6	9,001	2,325	61,825	41	386,881	Most taxes incurred and paid on our extractive activities in Oman are classified as production taxes in our financial statements following the IFRS accounting standards guidance. The global amount of profit and production taxes accrued in Oman in FY23 was \$461M.
Papua New Guinea	EP	0	0	0	-14,000	0	0	1,000	-114,000	290	841,000	
Republic of Congo	EP - MS	638,890	1,597,573	2,236,462	744,679	127,428	162,026	1,663,697	1,553,003	823	3,702,091	
Sao Tome and Principe	EP	0	0	0	-2,000	0	0	0	0	0	0	
Suriname	EP	0	0	0	-74,000	0	0	0	0	43	1,171,000	
Senegal	EP - MS	724,051	183,746	907,797	9,705	7,039	5,285	21,314	5,831	274	63,557	

(1) Does not include the activities of entities outside the scope of CbCR.



Introduction	<b>01</b> TotalEnergies at a glance	<b>02</b> Our approach to tax	<b>03</b> Our Total Tax Contribution 2023	<b>04</b> Our Country-by- Country Tax Report 2023	<b>05</b> Our Extractive Industries Reports 2023
--------------	-------------------------------------------	-------------------------------------	----------------------------------------------------	------------------------------------------------------------	-----------------------------------------------------------

<b>Tax jurisdiction</b> (in thousand of dollars)	Activities <sup>(1)</sup>	Third party revenue	Related party revenue	Total revenue	Profit (loss) before tax	Corporate income taxes paid/ (refunded)	Corporate income taxes accrued	Stated capital	Accumulated earnings	Number of employees	Tangible assets	Comments
South Africa	EP - GRP - MS	3,623,601	164,437	3,788,037	-57,489	37,606	37,821	64,587	423,592	771	820,338	Book to tax differences.
Uganda	EP - MS	541,520	5,850	547,370	-3,479	11,035	12,762	49,822	21,516	852	3,314,277	Absence of tax consolidation between the various entities in the jurisdiction.
United Arab Emirates	EP - GRP - MS - SCC	228,855	10,365,840	10,594,695	1,289,171	68,120	68,120	243,473	858	263	5,510,416	Most taxes incurred and paid on our extractive activities in UAE are classified as production taxes in our financial statements following the IFRS accounting standards guidance. The global amount of profit and production taxes accrued in UAE in FY23 was \$7,720M.
United Kingdom	EP - GRP - MS - RC	9,789,920	4,458,067	14,247,987	2,716,044	2,375,668	2,059,126	4,811,388	2,989,918	2,037	1,913,522	
United States	EP - GRP - MS - RC - SCC	18,207,067	32,995,515	51,202,582	929,161	35,301	107,939	22,171,628	1,313,235	6,588	9,411,014	Low corporate tax due to the carry forward of tax losses.
Rest of the world		83,263,657	112,393,109	195,656,766	9,188,758	729,308	1,127,462	5,995,272	12,385,688	13,715	4,585,003	
TOTAL		247,873,766	309,953,160	557,826,926	28,558,288	12,784,811	12,693,060	148,743,471	114,177,806	116,849	111,464,088	

(1) Does not include the activities of entities outside the scope of CbCR.

EP: Exploration & Production GRP: Gas Renewables & Power MS: Marketing & Services RC: Refining & Chemicals SSC: Shared service center



4

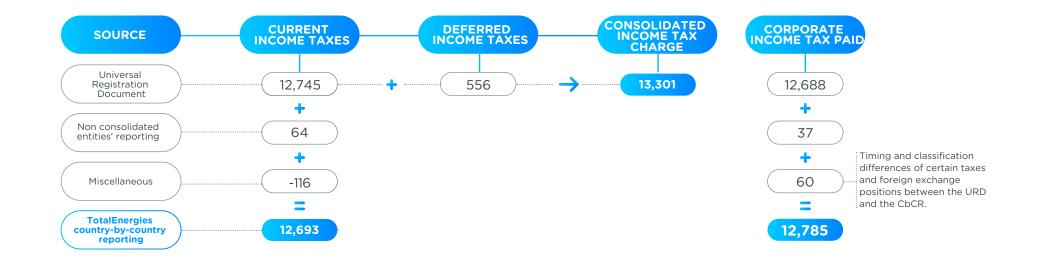


# Reconciliation of the 2023 corporate income tax information presented in the Universal Registration Document and the Country-by-Country Report (in M\$)

In our 2023 URD (pages 448 and 475), we report current and paid corporate income taxes of our consolidated entities. In our CbC reporting, we report current and paid corporate income taxes of all our entities, whether or not consolidated.

There may be other miscellaneous sources of minor variations : timing differences, classification differences, etc.

Substantial differences between tax paid and tax accrued may arise, as tax paid is mainly assessed on prior years' income while tax accrued is assessed on current year income (2023's). The corresponding difference between tax paid in a given year iand tax accrued on profits of that year will be settled in cash the following year(s).







Our Extractive Industries Reports 2023



02 to tax

03 Our Total Tax Contribution

04 Country Tax Report

05 **Our Extractive** Industries Reports 2023



TotalEnergies publishes a report every year in its Universal Registration Document (section 9.3.), which covers the payments (in cash or in kind) of at least 100,000 euros made by its fully consolidated extractive companies to public authorities in the countries in which they operate.

to Governments

This report details for each country of activity. the amount of payments, by payment type and by project. They are presented based on the Company's share in each project or fiscal entity, whether the payments are made directly by the consolidated extractive companies or indirectly through third-party operating companies. It is approved by the Board of Directors of TotalEnergies SE.

In this report, the Company discloses:

- Taxes and levies paid on income, production or profits, excluding taxes levied on consumption such as value added taxes, customs duties, personal income taxes and sales taxes:
- Royalties, which are a percentage of production payable to the owner of mineral rights:
- License fees:
- License bonuses paid for and in consideration of extraction rights;
- Dividends paid to host governments holding interests in an extractive company:
- Payments for Infrastructure Improvements:
- Production entitlements, which are the host government's share of production.

To mark our engagement for tax transparency, the Company voluntarily provides additional tax information beyond mandatory disclosures. Given the particular interest of civil society in corporate income taxes<sup>(1)</sup>, we disclose since 2021 corporate income tax payments by country, separately from other tax payments.

(1) As detailed above in the present report, the classification of profit taxes (also called corporate income taxes) follows the presentation applied in our Financial Statements.



TotalEnergies Our approach Our Total Our Country-by-	Our Extractive
Introduction at a glance to tax Tax Contribution Country Tax Report	Industries Reports
2023 2023	2023

### Payments in cash & in kind Other License License Infrastructure Production Total Income Taxes Royalties Dividends improvements entitlements of payments (in thousands of dollars) taxes taxes (total) fees bonuses Europe 20,833 24,083 44,916 Azerbaijan ------Bulgaria 217 -217 --- 1 ---135,574 Denmark 128,474 731 129,205 6,369 -----Italy 38,640 56,578 95,218 2,086 97,304 -----Netherlands 288,815 698 289,513 288,815 ------4,900,631 58,341 4,958,972 3,596 4,962,568 Norway ----- 1 2,354,713 United Kingdom 2,349,352 2,349,352 5,361 - 1 -----

Africa	1,965,491	527,036	2,492,527	-	72,993	82,941	25,000	56,407	1,716,365	4,446,233
Angola	623,757	83,611	707,368	-	11,777	18,950	-	1,322	1,602,707	2,342,124
Democratic Republic of the Congo	-	-	-	-	500	-	-	-	-	500
Gabon	32,778	51,573	84,351	-	3,282	-	25,000	15,391	-	128,024
Kenya	-	-	-	-	292	-	-	-	-	292
Mauritania	-	-	-	-	560	-	-	-	-	560
Mozambique	-	-	-	-	2,120	-	-	2,810	-	4,930
Namibia	-	-	-	-	212	-	-	-	-	212
Nigeria	1,186,752	144,238	1,330,990	-	10,099	63,991	-	34,154	113,222	1,552,456
Republic of the Congo	122,204	247,614	369,818	-	39,883	-	-	2,730	436	412,867
São Tomé and Principe	-	-	-	-	1,139	-	-	-	-	1,139
Senegal	-	-	-	-	1,152	-	-	-	-	1,152
South Africa	-	-	-	-	268	-	-	-	-	268
Uganda	-	-	-	-	1,709	-	-	-	-	1,709

Middle East and North Africa	849,141	9,972,257	10,821,398	132,797	14,313	378,685		909	2,247,736	13,595,838
Algeria	152,830	320,762	473,592	-	2,096	28,685	-	-	-	504,373



**03** Our Total Tax Contribution 2023 **04** Our Country-by-Country Tax Report 2023

# **05** Our Extractive Industries Reports 2023

### Payments

in cash & in kind (in thousands of dollars)	Income taxes	Other taxes	Taxes (total)	Royalties	License fees	License bonuses	Dividends	Infrastructure improvements	Production entitlements	Total of payments
Cyprus	-		-	-	962	-	-	-	-	962
Iraq	12,125	-	12,125	-	-	-	-	-	-	12,125
Lebanon	-	-	-	-	224	-	-	-	-	224
Libya	533,684	1,440,340	1,974,024	-	82	-	-	909	1,529,007	3,504,022
Oman	-	461,307	461,307	132,797	275	-	-	-	-	594,379
Qatar	150,502	30,046	180,548	-	-	-	-	-	718,729	899,277
United Arab Emirates	-	7,719,802	7,719,802	-	10,674	350,000	-	-	-	8,080,476

Americas	245,565	882,535	1,128,100	180,621	79,343	211,159		107	217,207	1,816,537
Argentina	34,349	80,711	115,060	-	7,475	-	-	-		122,535
Bolivia	-	172,375	172,375	-	636	-	-	107	24,952	198,070
Brazil	211,216	613,227	824,443	-	18,860	166,713	-	-	192,255	1,202,271
Canada	-	-	-	102,816	23,479	-	-	-		126,295
Mexico	-	1,577	1,577	-	27,712	-	-	-		29,289
Surinam	-	-	-	-	-	44,446	-	-		44,446
United States	-	14,645	14,645	77,805	1,181	-	-	-		93,631

Asia Pacific	339,655	141,445	481,100		2,551	15,628		2,980	93,704	595,963
Australia	-	45,211	45,211	-	2,136	-	-	-		47,347
Brunei	66,446	7,852	74,298	-	5	-	-	-	7,777	82,080
China	28,177	24,751	52,928	-	-	-	-	-	27,062	79,990
Indonesia	2,740	-	2,740	-	-	-	-	-	2,750	5,490
Kazakhstan	18,226	63,260	81,486	-	176	-	-	2,980	56,115	140,757
Papua New Guinea	-	-	-	-	234	-	-	-	-	234
Thailand	224,066	371	224,437	-	-	15,628	-	-	-	240,065
	•									
TOTAL	11,105,764	11,638,923	22,744,687	313,418	187,527	709,246	25,000	60,403	4,299,095	28,339,376



TAX TRANSPARENCY REPORT 2023 DECEMBER 2024 Sincere thanks to all contributors.

Design & Production: Acolad France

Photo credits: Miguel Schincariol, Julien Lutt, Laurent Hazgui, Pierre-Olivier Callede, Jawhar Kodadi, Adrien Daste, NK Production, Sténhane Compoint

Daste, NK Production, Stéphane Compoint, Ishan Tankha, L'Oeil Du Chat, TotalEnergies, Cody Porche, Nedim Imre, Ghislaine Desbois, Laurent Zylberman, Patrick Sordoillet.

