



ETHICS & COMPLIANCE

OUR BUSINESS POWERED BY INTEGRITY



ETHICS IN BUSINESS



Technip

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MESSAGE FROM THE CEO

In today's world, carrying out Technip's activities requires us to act ethically and in strict compliance with the law. I have reiterated this conviction on numerous occasions. **There is no other way for us to do business.** This is true for the Group, and it is true for each one of us.

Over the past few years, we have raised the bar for our professional practices. We have started to implement new policies and processes in governance, ethics and compliance. The Group General Counsel and the Group Compliance Officer lead our modern business approach with the full support of the management.

These "Ethics in Business" guidelines are one part of our continuous progress. We are not rewriting Technip's governance rules. With this document we are emphasizing key points concerning ethics for Technip's employees, both how to deal with the outside world and how to put our values into practice.

At Technip, it is everyone's responsibility to comply with these rules of conduct. Applying "Ethics in Business" and upholding our integrity are the keys to the company's future. That is why every employee will have my support and the support of the management in defending our rules of conduct and promoting our values to stakeholders.

Thierry Pilenko
Chairman and
Chief Executive Officer



ABOUT “ETHICS IN BUSINESS”

Technip is committed to complying with the laws and regulations in force in every country where it operates. There is no other alternative for us in how we run our business in our interactions with all our stakeholders.

With the “Ethics in Business” booklet, dedicated mainly to fighting corruption, we reaffirm our strong commitment to ensuring proper conduct in our day-to-day business.

Ethics is one of Technip’s core values and is an integral part of the Golden Book, our operational guidebook governing Technip’s management principles and responsibilities. But Ethics goes beyond the need to comply with law. If we believe in this value, we must promote exemplary behavior in all circumstances, both in our professional and our personal lives. And that is the purpose of this brochure.

By expressing our commitment towards our clients, suppliers, business partners and stakeholders, “Ethics in Business” lays down the guidelines for behavior within Technip. This brochure is designed as a guide for you in your decision-making with advice about handling business situations professionally, fairly and legally.

“Ethics in Business” is yours. It is mandatory that all Technip employees apply these principles rigorously, wherever you are, whatever you do, and, whatever your background may be.

“Ethics in Business” should also be shared and discussed with clients, suppliers and our business partners to better explain our rules of conduct and reinforce our culture of accountability.

Ethical behavior at all times in all business activities is essential for our company.





BUSINESS PRINCIPLES



ETHICS PRINCIPLES IN ACTION



Technip's aim is excellence. This requires building and maintaining a climate of mutual respect with all our partners. We must therefore apply the same principles of responsibility to all of our business relationships. These principles are set forth in the Ethics Charter*.

The Ethics Charter states that ***"it is the objective of Technip to conduct our business everywhere in the world with the highest standards of honesty, integrity and fairness."***

Responsibilities towards our partners in business

Excellence requires each and every one of us to conduct our activities as responsibly as possible for our business partners, customers, suppliers, subcontractors and, agents by:

- Providing truthful and honest information,
- Obtaining information of any nature concerning suppliers, subcontractors, customers by legal means only,
- Handling insider information with appropriate care,
- Protecting our own image and our customers' images,
- Respecting third-party intellectual property,
- Ensuring that procurement is transparent,
- Respecting cultural diversity in all business activities and decisions,
- Establishing cooperative relationships based on mutual good faith,



- Respecting principles of competition and open-market economy,
- Treating all clients and suppliers honestly and fairly,
- Establishing fair contractual relations,
- Delivering what we promise and not promising more than we can deliver,
- Living up to the trust our customers, subcontractors, and suppliers place in us,
- Promoting commitments of the Global Compact (see hereafter).

We apply to other business relationships the same principles of responsibility:

- Responsibility towards public officials by shunning corruption, bribery and illicit payments.
- Responsibility locally and towards society as a whole by increasing our involvement in communities where we do business, respecting local customs and understanding communities' expectations.
- Responsibility towards competitors, by promoting fair and open competition, refraining from anti-competitive practices, obtaining competitors information by legal means only.

Technip and the ten principles of the Global Compact

The United Nations Global Compact requires companies to embrace, support and implement a set of core values in the areas of human rights, labor standards, the environment and anti-corruption. The ten Principles enjoy universal consensus and are based on:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention against Corruption

Universal application of these principles is essential to build strong relationships with all our partners. Therefore, Technip is supporting and promoting the Global Compact, within its sphere of influence, since 2003.

** The Ethics Charter is one of a series of Technip Charters (Ethics, Social, Environmental, Health and Safety, Quality and Security). These 6 Charters cover all commitments towards all stakeholders.*

WE ARE ALL ACCOUNTABLE



Technip integrates the values of integrity, professional excellence, protection of health, safety, security and the environment and social responsibility in all its day-to-day activities. Integrity is the most important value for implementing our ethics principles. It requires two commitments: scrupulous observance of the law and the complete absence of improper intentions everywhere Technip operates. This expands the meaning of this core value and requires all of us to adopt exemplary professional behavior in all situations.

Integrity is one of our major strengths

Our reputation for integrity is one of our major strengths in the eyes of our business partners. We are judged according to our acts, and our reputation will be strengthened if each one of us acts in accordance with this principle.

Technip is committed to full compliance with national and international legislation in every country where we do or intend to do business. All employees are required to comply with applicable rules; it is part of their duty and responsibility. To fulfill this commitment, all employees must be vigilant with regard to themselves, their professional network, their teams and the people under their management.



Integrity and other values must define our conduct

Our behavior cannot be dictated only by the rule of law. These “Ethics in Business” guidelines are not intended to simply reproduce all laws, regulations, internal standards and agreements that already govern Technip’s activities.

Acting with integrity requires each of us to recognize that our decisions may affect those around us, people who do not have the opportunity to participate in making these decisions.

Acting with integrity requires that individual behavior be governed by honesty, respect for others and fairness. It is the responsibility of every employee to analyze each situation and behave according to these principles.

Developing integrity practices within Technip

Technip expects everyone to act with exemplary professional conduct in all situations.

- **Everyone must act with integrity in everyday life, meaning we must:**
 - Be aware
 - Train others and be trained
 - Comply with regulation and standards
 - Help others and ask for help when needed
- **Everyone must try hard to help others by:**
 - Listening
 - Sharing
 - Advising
- **Everyone has a duty to raise an alert in case of risk for the Company or for the employee by:**
 - Acting with courage
 - Considering the adverse consequences of not blowing the whistle

Why is it essential to act ethically in business?

- **It is our duty to obey laws and regulations**

We run major risks if we don't comply with criminal and civil legislation, to give just one example.

- **Ethics and integrity have long been an integral part of our core values**

For us, the spirit and the letter of the law constitute a clear framework for working with our business partners.

- **Ethics is a key factor for the economic success of our company**

Compliance with rules earns us our clients' trust and confidence. Compliance also helps us to avoid potential heavy fines.

- **Ethics is a key source of pride for everybody**

Most people share the values of ethics, integrity, honesty and respect for the others.

IMPLEMENTATION OF ETHICS WITHIN TECHNIP



Technip's leaders and management are taking steps to spread the ethics core value throughout the Company through ethical governance rules for the Board of Directors, internal policies, charters and rigorous processes, fair human resources management, internal control, financial and audit procedures, etc.

In our day-to-day activities, Technip is committed to fighting corruption in all its forms. We must keep in mind that corruption and non-compliance with the law constitute one of the greatest risks for our company (direct economic costs, potential heavy fines, legal proceedings, impact on share price and reputation). There are various means that can be implemented to help each of us avoid this kind of risk.

Organizational structure

Technip has specific organizational bodies concerned with ethics and compliance issues to ensure that internal procedures are followed, monitor the effectiveness of the Group's Ethics Charter and provide support at all levels of the Company.

- **The Ethics and Compliance Committee** ensures that the Ethics Charter and all related internal requirements are properly implemented.
- **The Group Compliance Officer** chairs the Ethics and Compliance Committee, ensures the compliance in particular with international anti-corruption laws and conducts the due diligence for business partners at the Group level.



- **Regional Compliance Officers** provide a local contact in each region for everyday operations. They are responsible for disseminating the Ethics and Compliance rules and for monitoring their application. They also ensure that employees receive proper training and necessary information.

Procedures

Technip implements specific procedures to ensure compliance with anti-corruption laws and compliance policy.

- “Doing Business Abroad – Technip Anti-Corruption Policy and Guide” provides a clear and comprehensive operational framework for conducting Technip’s business in every country in which we operate.
- “Anti-Corruption Know Your Partner – Due Diligence Procedures” describes how to investigate the background and reputation of our prospective business partners to ensure that they will fully comply with our Anti-corruption Compliance Policy.
- “Gifts and Hospitality” provides an operational framework to ensure that gifts and hospitality are not and cannot be considered as bribes.
- “Whistleblowing Procedure” gives every Technip employee a route to inform the Ethics and Compliance Committee about behavior he/she believes to be inconsistent with the rules in the areas of accounting, financing and anti-corruption.

Those procedures are available on Technip Group Intranet (Procedures & Standards).

Training sessions

“Ethics in Business” must be enforced by every employee and manager as well as every leader. Ultimately, each of us is personally responsible for making sure that we comply with the rules and regulations that apply to our business. We must stay informed about risks as well as good practices to fight corruption.

Specific training sessions are provided to improve our knowledge and develop a common culture:

- Training sessions for managers who have a special responsibility to lead with integrity by example. Managers must ensure that employees and contractors under their responsibility are aware of and comply with “Ethics in Business”.

- Training sessions on legal compliance for all Technip personnel. Ignorance of the law is no excuse for non compliance. However, we cannot ask everyone to be a specialist in the legislation that applies to his/her professional activity. Therefore training sessions help employees to acquire sufficient knowledge of the legislation that applies to their activities, and allow them to determine when to seek counsel from management or from the Regional Compliance Officer.

These and future training sessions serve to encourage all employees to share the “Ethics in Business” practices of Technip and to behave fairly in the interests of the Company.

Support and control

Internal controls, relating to Ethics and Compliance, are managed in each region by the Group and the Regional Compliance Officer. The reviews take into account geographic risk factors published by Transparency International.

Regional Compliance Officers handle day-to-day queries and help all the company’s officers, employees and agents avoid corruption in all its forms. They know what is customary in a country and what is not. They remain pragmatic and business-oriented whilst taking cultural differences into account.



MAIN RULES OF CONDUCT



Foreword

Some situations are known to raise major risks for employees and for Technip.

The following rules of conduct are not intended to cover every ethical issue but to give general guidance. To put it simply, we must:

1. Act with thoughtfulness, common sense and sound judgment,
2. Act with respect, considering the impact of our decisions on others,
3. Seek advice in case of any doubt.

The main rules of conduct deal with:

- Corruption, bribes and money laundering,
- Gifts and hospitality,
- Political activities, donations and sponsorship,
- Conflict of Interest,
- Professional alerts and Whistleblowing Procedure.

CORRUPTION, BRIBES AND MONEY LAUNDERING



Anti-corruption law and Technip Commitments

Corruption is the diversion of a process by dishonest practices to obtain certain benefits. Offering bribes is one common corrupt practice which consists in offering remuneration to someone in return for a favorable decision. All acts of corruption are strictly prohibited.

The OECD convention (Organisation for Economic Co-operation and Development), the Foreign Corrupt Practices Act in the U.S.A., the UK Bribery Act 2010 and numerous other laws ban all acts of corruption to obtain or retain a market or to benefit from an advantage of any other kind.

As a result, no payment may be offered to public officials, politicians or political parties, either directly or indirectly, in an attempt to influence the behavior of any country's administration.

It is also strictly prohibited to make payments or provide other objects of value such as gifts, loans, discounts, excessive hospitality expenses or to use the company's funds or assets in an attempt to influence a decision under any circumstances.

Technip, its employees and representatives may face civil or criminal sanctions if they violate laws on corruption in business or any similar law.



Technip is committed to complying with all international and national legislation against illegal payments.

Technip shall refrain from giving, proposing, promising or soliciting, either directly or indirectly, all payment or supply of services, gifts or leisure activities to obtain or retain a market or a competitive advantage. This rule is valid for transactions with government officials, companies or private persons, within the framework of Technip's national and international activities.

Technip may be held liable for improper payments made by its business partners. We must ensure that our agents, our subcontractors and our suppliers do not make illegal payments.

Money laundering

Money laundering is the process by which the criminal origins of funds or the value of funds are hidden within a company's accounting or within legitimate commercial activities.

Some suspect situations include:

- Transactions in which you don't know information concerning the parties' identities,
- Transactions conducted through unknown or unnecessary intermediaries,
- Unnecessary or unexplained transactions,
- Abnormal settlement methods.

Laws against money laundering usually involve the company's as well as the employee's individual criminal responsibility.



Do...

- Refuse to take or give any bribe or personal benefit.
- Resist pressure, and contact your manager.
- Inform your manager of any attempted corruption, request for illicit payment or any other corrupt practice.
- Use the Whistleblowing system to report any act of corruption or any attempt to conceal corruption from the appropriate audit to the Ethics and Compliance Committee and take the initiative to prevent the unlawful behavior.
- Check the character and integrity of every agent and ensure that he/she understands Technip's position on corruption.
- Record all transactions on behalf of Technip accurately and honestly in Company accounts.
- Be courteous and cheerful in defending Technip practices.
- Make careful inquiries about the origin of any money we receive or acquire.
- Check the legitimacy of the destination of any payment we make.
- Seek advice from your manager or Regional Compliance Officer if you have any doubt about payments that you have been requested to make, including facilitation payments.



Don't...

- Offer facilitation payment, illegal payments or bribes, for any reasons (direct or indirect offer).
- Use charitable contributions to hide acts of corruption.
- Use third parties to offer or accept bribes or facilitation payments indirectly.
- Try to investigate any case of money laundering on your own.
- Reveal your suspicions of money laundering to the other party in the transaction, but seek advice from your manager or Regional Compliance Officer.

GIFTS AND HOSPITALITY



Gifts and hospitality may constitute acts of corruption which are strictly prohibited. They may lead to civil and/or criminal penalties and may expose Technip and/or its employees to prosecution. This is why Technip employees should not grant nor accept any undue benefit, whether monetary or non-monetary, directly or indirectly, to or from any Government Official*, client (actual or potential), supplier, vendor, subcontractor and any other third party.

Gifts or invitations should never influence decisions or be seen as having an influence on those receiving them.

However, there are exceptions:

- Exchanging occasional small gifts or invitations of only nominal value may make a legitimate contribution to good business relations.
- Refusing a gift, if this gift is considered acceptable by local customs, may offend our local partners.

As a conclusion, giving or promising gifts or free services is not permitted unless it is a matter of courtesy or customary hospitality or if the gifts are symbolic or of minimal value.

Acceptable gifts and hospitality

The Gifts and Hospitality Group Instruction defines the following gifts and hospitality as acceptable:



- Gifts in the form of unsolicited promotional materials of a general advertising nature such as calendars or diaries, provided their price is nominal,
- Gifts of a purely ceremonial nature (medals, etc.),
- Hospitality limited to meals, entertainments, travel costs,
- Fruit basket,
- Flowers.

In any case, check that gifts and hospitality are directly connected to a business related purpose, are reasonable in value, given in good faith, and permitted under local law and regulation.

Should you have any doubts about local customs, please seek advice from your Regional Compliance Officer.

Non acceptable gifts and hospitality

Some gifts and hospitality are by their nature illicit and are prohibited by Technip policy: cash payments, personal services, loans, gifts and invitations of an improper nature or to improper places, events or meals in which the commercial partner does not participate and gifts or invitations at periods when important commercial decisions are taken.

The following questions will also help you to determine whether the gifts and hospitality are acceptable or unethical:

- Are the gifts and hospitality prohibited by any law or regulation?
- Are they too frequently offered or requested by the same individual?
- Would I be embarrassed if the gifts or the hospitality were disclosed to the public?
- Does my acceptance or my offer create an obligation for me or an obligation within my business relationship?

Should you have any doubts about local customs, please seek advice from your Regional Compliance Officer.

**Government officials include, inter alia, officials and representatives of any government, candidates for a government office, members of political parties and international organizations, officials of government-owned corporations (See comprehensive definition in GOPS 25001 available on TPNNet Group).*



Do...

- Tell your manager about any gift or invitation offered or accepted, whatever its value.
- Inform your business partner about Technip's policy on gifts and entertainment at the beginning of every new business relationship.
- Speak to your manager if a supplier or a subcontractor offers you gifts or invitations of significant value.
- Ask for your manager's approval before offering gifts or invitations to representatives of a government official.
- Treat a gift, invitation or offer made by an intermediary the same way you would treat a direct offer.
- Accept or offer restaurant invitations only if they are linked to a particular event.
- Understand local customs and laws before offering or receiving gifts, leisure activities or other benefits.
- Take into account the company policy of the person receiving the gift or invitation.
- Record all gifts offered and received, accurately and duly supported by invoices and receipts, in the relevant company books and records.
- Seek advice from your manager or from your Regional Compliance Officer if you are not completely sure.



Don't...

- Solicit gifts or invitations.
- Offer or accept gifts, or provide a service that you would have difficulty explaining to your colleagues, your family or the media.
- Accept gifts or hospitality from potential suppliers who could place you in a situation of obligation. In particular, avoid any real or perceived obligation during the evaluation process.
- Be afraid to refuse an offer that exceeds what is considered acceptable at Technip; do refer to the Technip policy to explain your position and support your decision.



POLITICAL ACTIVITIES, DONATIONS AND SPONSORSHIP



Political activities

As a member of civil society, Technip observes strict political, religious and philosophical neutrality. Therefore, Technip's policy is to make no financial contribution to political candidates, elected representatives or political parties.

Technip also respects the individual commitment of its employees who, as citizens, participate in political or public activities. Nevertheless, such commitments must not affect the activities or image of Technip nor may they affect the neutral position of the Company. Therefore, some rules must be respected:

- Technip employees may participate in political activities in their own name and outside working hours.
- None of the premises, equipment or any other assets belonging to Technip may be used to conduct personal political activities.
- Technip employees must not use Technip's corporate image to support their convictions.
- Technip employees must respect the beliefs of others.
- Any employee who participates, within the scope of his political activities, in the decision-making process of a State, public authority or local government agency must refrain from taking part in decisions that concern Technip.



Donations and sponsorship

Technip believes in contributing to local communities in which it does business and therefore permits reasonable donations to charities. However, Technip also intends to comply strictly with legislation. The main risk is that donations could be considered disguised illegal payments. To avoid these risks, Technip only finances associations or foundations or takes part in sponsorship projects whose activities are legally acceptable and in line with the values and priorities previously defined.

To secure contributions on behalf of Technip, any donation or sponsorship must be previously approved according to the Group Instruction concerning social and donation policy. You may also consider the Group Instruction concerning gifts and hospitality.



Do...

- Exercise your freedom of opinion and political activity outside the scope of your employment contract, at your own expense and on an exclusively personal basis.
- Explain clearly that you represent only your own personal views when you participate in political activities.
- Get your manager's approval before communicating in Technip's name with government representatives on political matters.
- Think of Technip's reputation and how the public would perceive your actions when you communicate with government representatives.
- Seek advice from your manager or Regional Compliance Officer if you are solicited for financing or a donation which could be interpreted as funding of a political party.
- Notify your manager if a government official contacts you outside your normal activities.



Don't...

- Use your position at Technip to urge anyone to make political contributions or to support a political party.
- Use or allow the use of Technip's assets or resources (phones, IT, meeting rooms, etc.) for a political campaign, party or candidate.
- Use donations for community benefit to hide political contributions.

CONFLICT OF INTEREST



Technip staff is expected to make informed business choices and be completely loyal to the Company. Therefore, any situation in which staff's personal interests or those of their relations might be in conflict with Technip interests must be avoided.

When employees conduct their professional activities, they must act only in Technip's interest. They must refrain from taking advantage of any benefit or personal interest, either directly or indirectly, for their own account or for others.

Employees shall not intentionally place themselves in a conflict of interest situation and may not participate in any evaluation, meeting or decision-making process relative to subjects in which they or their relations have a personal interest.

To avoid any potential conflict of interest, employees must strictly comply with the regulations that apply in various countries and the procedures in specific areas of activity, such as purchasing, subcontracting, and procurement. Common sense and good judgment should ultimately help avoid any conflict of interest.

Which situations can involve a conflict of interest?

A conflict of interest is a conflict between your own personal interests and the interests of Technip. Consequently, situations



that could be perceived as a conflict of interest are numerous. Some examples are described below:

- An employee or an employee's family member holding personal interests in a company that is Technip's customer, supplier, subcontractor or competitor.
- An employee or an employee's family member sitting on the board of directors or who is an executive of another company associated with Technip.
- An employee or an employee's family member who holds a management position in sales or purchasing in another company associated with Technip, or one that seeks such association.
- An employee or an employee's family member who provides equipment or personal property to Technip for a fee.
- An employee having an outside job or employment that could affect his/her performance at Technip.
- Personal use or sharing of insider information for personal interest.
- An employee who has an influence over the hiring, job evaluation or compensation of any person who is a relative or partner.
- Acceptance of personal benefit (more significant than a modest gift or entertainment) from a person or organization doing business, or expecting to do business, with Technip.



Do...

- Act with professionalism, impartiality and competitiveness in your relations with subcontractors and suppliers.
- Strictly apply purchasing and procurement processes.
- Obtain your manager's approval in writing before undertaking any transaction with a company where a member of your family is an investor or a key officer.
- Obtain permission from your manager before hiring a spouse, child or other personal relation. Such hiring must be based only on objective criteria.
- Inform your manager immediately of any situation in which your personal interest or the interest of a close relation may be in conflict with the interests of Technip.
- Inform your manager of any outside assignment or employment of a professional nature.



Don't...

- Let your relations with subcontractors or suppliers influence the decisions you make for Technip.
- Use your position at Technip, or any confidential information or knowledge, to serve your personal interest or obtain indirect advantages.
- Take part directly in the hiring of, management of, or contracting of any kind of assignment to a member of your family.
- Accept personal gifts which could create an obligation for you.
- Accept an assignment or outside work offered by a supplier, client or competitor that could affect your performance or judgment in carrying out your duties in the Company.
- Accept any remuneration from any organization or person which has a current business relationship or conflict with Technip.
- Use Technip's name or image for personal interest.

PROFESSIONAL ALERTS AND WHISTLEBLOWING PROCEDURE



Technip operates in an ever changing world. It is almost impossible to anticipate all the challenges we face when working for this Company. Nonetheless, violation of laws and regulations which govern our activities may have serious consequences for the persons involved in those violations as well as for Technip.

For this reason we must remain alert to and inform the management of any risk of legal or regulatory non-compliance. This should become a reflex, something that we automatically consider in our everyday business dealings.

What are Technip employees' rights and duties?

It is the responsibility of each employee to report any real or perceived violation of any rule. Any employee who believes that a law, regulation or ethical rule is being violated must inform his manager as soon as possible.

It is the duty of line management to assist employees in resolving any difficulty they may face. When in doubt, the Regional Compliance Officer should also be consulted.

The employee can also use the Whistleblowing Procedure if he/she has reason to believe that anti-corruption, financial or accounting laws or rules have been violated. The Whistleblowing Procedure should be used when the employee has reason to believe that informing his immediate superiors would cause



difficulties.

No action may be taken and no sanction may be applied against any good-faith employee who raises concerns about possible illegal practices or ethical violations. All measures will be taken to respect the employees' confidentiality.

Technip reaffirms its commitment that no employee will suffer any change of status, harassment or any other form of discrimination as a result of disclosing information or using the Whistleblowing Procedure in good faith. However, an employee who submits a complaint in bad faith may be subject to disciplinary sanctions.

Key rules of the Whistleblowing Procedure

1. Complaints are made directly to the Ethics and Compliance Committee

Complaints must be made directly to the Ethics and Compliance Committee and to no other person.

2. Confidentiality and security of information are strictly maintained

Employees filing a complaint must keep all information related to the complaint confidential. The identity of the whistleblower will remain confidential. The Ethics and Compliance Committee will make sure that the security of the information collected, distributed and stored is preserved.

3. Only relevant, adequate and concise information is reported and taken into account

Reports must be clear, brief and comprehensive. No value judgment or subjective comments on the behavior of individuals will be taken into account.

4. Complaints will be rigorously processed

Processing includes assessment of the seriousness of the allegation, gathering of specific information and investigation by internal auditors acting under the supervision of the Ethics and Compliance Committee. Then, the Ethics and Compliance Committee decides on a case by case basis whether any disciplinary, legal or administrative action should be taken.

5. The rights of the person who is the subject of the complaint are respected

Any person who is the subject of a complaint through the Whistleblowing Procedure may access information concerning him or her upon simple request to the Ethics and Compliance Committee. The subject of the complaint may request the correction of data that is inaccurate, incomplete, ambiguous or out of date. However, this right of access does not extend to information related to third parties (e.g. the whistleblower).

6. The whistleblower is protected

An employee must report any inappropriate conduct or retaliatory measures to the Ethics and Compliance Committee. The Committee will take the appropriate measures to protect individuals. Persons responsible for such conduct or retaliatory measures are liable to disciplinary sanctions.

7. Whistleblowing must not be abused

Any employee who submits a complaint in bad faith by communicating false, misleading information or information with a malicious intent, is liable to disciplinary sanctions.





TECHNIP ETHICS CHARTER



TECHNIP ETHICS CHARTER



Integrity is one of the core values of Technip. This charter defines the Group's objectives in this area and the corresponding rules of good conduct.

Our Objectives

- To offer opportunities for success to all our suppliers, partners and subcontractors in a spirit of fair competition and mutually rewarding collaboration.
- To conduct business everywhere in the world with the highest standards of honesty, integrity and fairness, in accordance with the Global Compact principles.
- To put our staff at the heart of our strategic development, and create conditions for the individual men and women of Technip to reach their full potential.
- To disclose relevant information openly and transparently with our shareholders and the financial community.

Our Rules of Good Conduct

In carrying out their professional activities, the employees of Technip must strive throughout the world to comply with the following rules of good conduct:

- Respecting the spirit and the letter of applicable laws.
- Not granting, directly or indirectly any kind of benefit to any person involved in Technip business for the purposes of obtaining commercial favours.
- Not using for their personal profit or disclosing to a third



party any insider information to which they may have access through their professional activities, and in particular, not buying or selling, or having bought or sold by a third party, any stocks and/or shares of Technip until such information has been made public by Technip.

- Avoiding any conflict of interest between their roles in the Group's business and their private interests, particularly in their relations with clients, competitors and suppliers. In this regard, Technip staff must refrain from offering or accepting gifts or invitations which would not be consistent with acceptable practices or applicable laws. They must also refrain from investing or acquiring interests with clients, competitors or suppliers without the prior written consent of management.
- Protecting the confidentiality of the information to which they have access through their professional activities.
- Informing the Ethics and Compliance Committee of the Group about any behavior which is not compliant with the rules set forth in this Charter.

February 2010





APPENDIX: REFERENCES



REFERENCES



Procedures

- The Golden Book – Technip Group Management Principles & Responsibilities
- GOPS 25001 – Doing Business Abroad, Technip Anti-corruption Compliance Policy and Guide
- GOPS 25002 – “Know your Partner” – Due diligence procedures
- GOPS 25003 – Whistleblowing Procedure
- GI 25004 – Gifts and Hospitality
- Other GOPS and GI as they become available

Those procedures are available on Technip Group Intranet.

Charters

Ethics Charter
Social Charter
Environmental Charter
Quality Charter
Health and Safety Charter
Security Charter

Those charters are available on Technip Group Intranet and on www.technip.com.



Find out more

- United Nations Global Compact (www.unglobalcompact.org)
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (www.oecd.org)
- French Penal Code, articles 113-2; 121-2; 435-3; 445-1 (www.legifrance.gouv.fr)
- Foreign Corrupt Practices Act (FCPA) (www.justice.gov/criminal/fraud)
- Transparency International Corruption Perceptions Index (www.transparency.org)
- UK Bribery Act 2010 (www.legislation.gov.uk)



If you have any concerns or questions, you may contact any of the following people:

1. Your manager, who plays a key role towards members of the team by respecting and ensuring respect for these behavior rules on a daily basis
2. Your Regional Compliance Officer
3. The Group Compliance Officer



For any questions on this brochure, you are invited to contact:

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