



**TotalEnergies**

# Tax Transparency Report 2019-2020



## “Energy is life.

We all need it and it’s a source of progress. So today, to contribute to the sustainable development of the planet facing the climate challenge, we are moving forward, together, towards new energies.

Energy is reinventing itself, and this energy journey is ours. Our ambition is to be a world-class player in the energy transition. That is why Total is transforming and becoming TotalEnergies. ”

Patrick Pouyanné,  
Chairman and Chief Executive Officer of TotalEnergies  
as Total announced its change of identity on May 28, 2021.

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# Why this Report?

Our tax payments represent a substantial part of our contribution to social and economic development in the countries of our activities. Mindful of its responsibility, TotalEnergies is committed to a responsible approach to tax.

Energy is transforming, so is our Company. Total became TotalEnergies in 2021. A new name, a new logo, that anchors at the heart of our identity our strategy towards transformation and our ambition: to be a world-class player in the energy transition. To fulfill this ambition, sustainability is a central pillar and transparency is the rule of conduct in our engagement with society.

The Company has been an early and active supporter of transparency. It has been a permanent member of the Extractive Industries Transparency Initiative (EITI) since its founding in 2003 and made its tax policy public as early as in 2014. It was the first major company to support public disclosure by countries of their petroleum contracts. It also publishes since 2015 in its Universal Registration Document an annual report covering all the payments made by its extractive affiliates to governments, as well as the full list of its consolidated entities, together with their countries of incorporation and of operations.

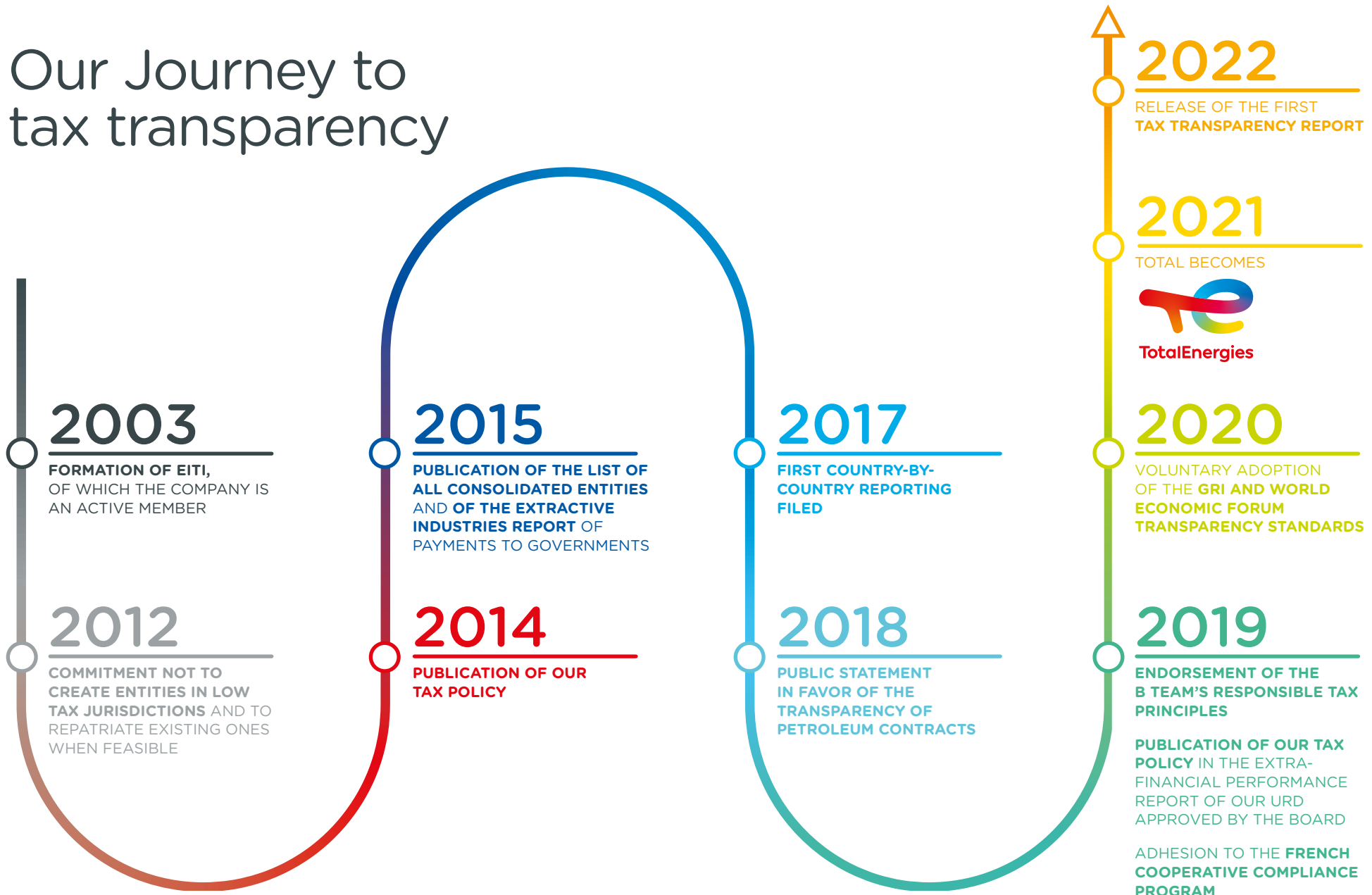
Today, it is my pleasure to share this first tax transparency report with our stakeholders. It provides additional information on our tax position: both on our worldwide total tax contribution, and on the taxes paid, on a country-by-country basis, in the European Union (ahead of the implementation of the mandatory EU regulation) and in the countries where we conduct extractive activities. This report covers data relating to years 2019 and 2020 as the pandemic caused 2020 to be a year beyond compare. Once our 2021 Country-by-Country tax reporting is filed, 2021 data will be shared. And as contextual information is key to contribute to public understanding and trust, this report also explains our approach to various essential tax matters.

TotalEnergies is embarked on a path to continuous improvement towards sustainability and I trust this report is a significant step in this direction, which will provide meaningful information on the tax contribution of our Company, as well as on its tax strategy and conduct.

**Jean-Pierre Sbraire,**  
Chief Financial Officer



# Our Journey to tax transparency





# 1

## TotalEnergies in Brief

- › Our Ambition
- › Our Operations
- › Our Action Principles
- › Our Strengths
- › Our Key Figures

# Our Ambition

## OUR AMBITION IS TO BE A MAJOR PLAYER IN THE ENERGY TRANSITION.

TotalEnergies is a **broad energy company** committed to providing energy that is ever more **affordable, clean, reliable and accessible** to as many people as possible.

**More energy, less emissions:** that is the dual challenge we must meet with our customers, stakeholders and society as a whole to contribute to our planet's sustainable development and effectively address the issue of climate change.

We promote renewable, decarbonized energies, produce and market fuels, natural gas and electricity. We are investing massively in solar and wind power in order to become one of the **top five producers of renewable energy by 2030.**



OIL



NATURAL GAS



ELECTRICITY



HYDROGEN



BIOMASS



WIND



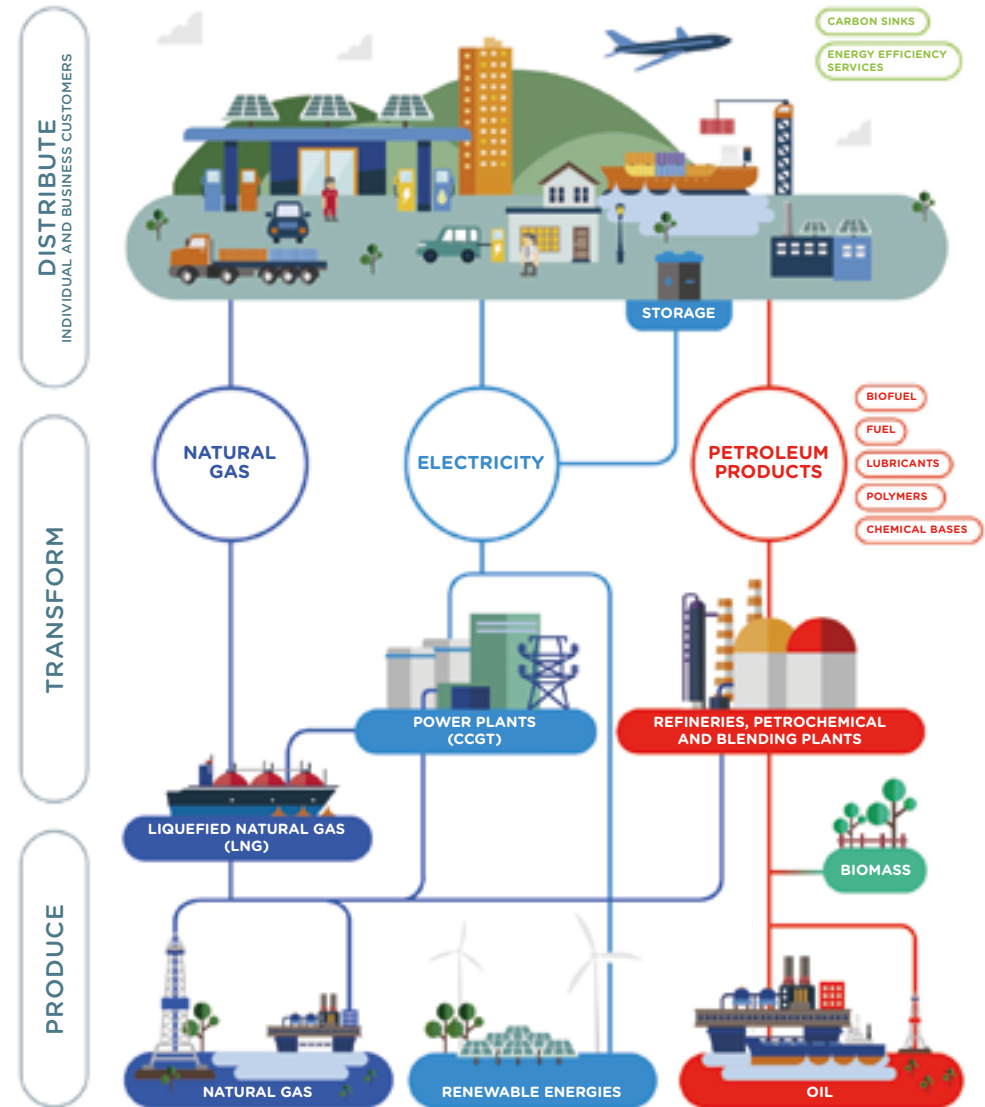
SOLAR

# Our Operations

## OUR ACTIVITIES SPAN THE ENTIRE VALUE CHAIN:

- from the **production** of energies,
- and their **transportation** and **transformation** into intermediate or finished products,
- to their **storage** and **distribution** to meet the needs of individual and business customers.

We also **develop** carbon neutrality projects for our own sites and for customers, with solutions to enhance **energy efficiency** and to **capture** or **store carbon** (CCS and natural carbon sinks).





# Our Action Principles

TotalEnergies relies on a set of principles that are at the heart of its **responsible business model** and Code of Conduct.



## • Safety

Security, operational excellence and sustainable development go hand in hand.

## • Respect for each other

The cornerstone of our Code of Conduct.

## • Zero Tolerance

Our rule of conduct in the fight against corruption and fraud.

## • Transparency

Our rule of conduct in engagement with society, whatever the subject.

# Our Strengths

## Our integrated business model

We are present across the entire value chain, from production to distribution and so maximize value from the markets' volatility.

## Our employees

More than 100,000 people representing 160 nationalities and 730 métiers. A diversity which is decisive for our competitiveness and attractiveness.

## Our global footprint

We are active in more than 130 countries and nearly 800 production sites worldwide.



# Our Key Figures in 2020



**105k**  
PEOPLE



ACTIVE IN MORE THAN  
**130**  
COUNTRIES



NEARLY  
**800**  
PRODUCTION SITES  
WORLDWIDE



**\$4.1 bn**  
IN ADJUSTED  
NET INCOME IN 2020

AVERAGE BRENT PRICE:  
41.8\$/BARREL



MORE THAN  
**4,000**  
RESEARCHERS  
IN OUR **18**  
R&D CENTERS



MORE THAN  
**8 M**  
CUSTOMERS  
SERVED DAILY IN OUR  
**15.5k+**  
SERVICE STATIONS



**8.5 M**  
GAS AND POWER  
CUSTOMERS  
IN EUROPE



**2.9Mboe**  
PRODUCED DAILY  
IN 2020  
OF WHICH

**55%**  
NATURAL GAS



**38.3MT**  
LIQUEFIED  
NATURAL GAS SOLD  
IN 2020



**21k**  
CHARGE POINTS  
FOR ELECTRIC VEHICLES  
IN EUROPE IN 2020



**7GW**  
GROSS INSTALLED  
CAPACITY OF RENEWABLE  
POWER GENERATION IN 2020



NEARLY  
**\$1 bn**  
INVESTED IN R&D  
IN 2020



**\$2 bn**  
INVESTED IN  
RENEWABLES  
IN 2020



# 2

## Our Approach to Tax

- › Our Tax Policy
- › Our Presence in Jurisdictions subject to Tax Controversy
- › Our View on Key Tax Matters

# Our Tax Policy

**With a presence in 2020 in more than 130 countries through 1,118 consolidated entities, the Company carries out its operations in a constantly changing environment and is subject to an increasingly complex set of tax regulations, which may be in conflict when combined or subject to varying interpretations, thus giving rise to potential tax risk.**

**In this context, the company 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 was released in its initial version in 2014 and is available to the public on our Company website.**

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.

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.



## Our Presence in Jurisdictions subject to Tax Controversy



### **DOES TOTALENERGIES HAVE ENTITIES IN JURISDICTIONS SUBJECT TO TAX CONTROVERSY?**

There is no universally agreed definition of what a tax haven is.

According to the OECD, a tax haven is generally a country or a jurisdiction which offers to foreign investors:

- low or zero effective tax rates and/or,
- a lack of effective exchange of information, thus allowing a high level of secrecy.

“Black lists” of non-cooperative countries have been initially developed by the OECD’s Committee on Fiscal Affairs. The European Commission and the French government have also issued their own lists, which are periodically revised.

- As at December 31, 2021, no jurisdiction is listed as a non-cooperative tax haven by the OECD Committee.
- The latest EU black list available when preparing this report (i.e., published on October 5, 2021) includes the following jurisdictions: American Samoa, Fiji, Guam, Palau, Panama, Samoa, Trinidad and Tobago, US Virgin Islands and Vanuatu.
- The current French list includes the EU black listed jurisdictions above, plus a few other countries (the British Virgin Islands, Seychelles, Anguilla and Dominica).

At the end of 2020, only two TotalEnergies' consolidated affiliates (out of 1118) had presence in one of the EU or French black listed jurisdictions: Panama and Fiji. Both entities carry out a business locally:

- Colon LNG Marketing (50% held) owns long-term capacity in the Costa Norte LNG Terminal in Panama and markets liquefied natural gas on the local market and in the Central American and Caribbean region;
- TotalEnergies Fiji Ltd (100% held) owns and operates a service stations network in Fiji.

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.

Different stakeholders may have different views on whether a particular jurisdiction is contentious from a tax standpoint.

Acting on its commitment to transparency, TotalEnergies proactively publishes 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).

With this tax transparency report, TotalEnergies is going a step further by disclosing additional data on its presence and operations in its main countries of operation, including key indicators of substance, profitability and taxes incurred on a per country basis.





## WHY ARE WE PRESENT IN JURISDICTIONS SUBJECT TO TAX CONTROVERSY?

Contextual information is key to understand each specific situation. We sum up below the main business cases applicable to TotalEnergies.

### 1 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, in 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, 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 or any other country) 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>1</sup>) At least 10% held in the oil & gas sector and 50% in all other branches

## 2 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 USD 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. This triggers no income tax effect since no income is allocated to this country.

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.

## 3 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 not to create affiliates in countries generally acknowledged as tax havens, and to repatriate or liquidate existing affiliates where feasible.

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 jeopardize our rights in the underlying asset or trigger a material ungrounded tax liability (absent any revenue or actual transfer of property).

**Since 2012, TotalEnergies has liquidated or transferred 26 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.

## OUR PRESENCE IN...

### Bermuda

#### KEY FIGURES 2020 (M\$)\*

<b>3</b>	REVENUE
<b>1</b>	PROFIT BEFORE TAX
<b>0</b>	EMPLOYEES
<b>0</b>	CIT ACCRUED



At the end of 2020, TotalEnergies owned 7 consolidated affiliates incorporated in Bermuda (among which only one is more than 50% held). 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. Even today, as explained above, as no income is located in Bermuda, this incorporation does not offer a privileged tax regime compared to France. 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.

### British Virgin Islands

#### KEY FIGURES 2020 (M\$)\*

<b>0</b>	REVENUE
<b>0</b>	PROFIT BEFORE TAX
<b>0</b>	EMPLOYEES
<b>0</b>	CIT ACCRUED



At the end of 2019, TotalEnergies owned two consolidated affiliates incorporated in the BVI. Both affiliates operated in Angola and had no revenue or profit in the BVI, where they had their head office. They were acquired by the Company in 2018, as part of the acquisition of Maersk's oil and gas activities. In 2020, consistent with the Company's tax policy, one was eliminated and the other was redomiciled to France.

### Cayman Islands

#### KEY FIGURES 2020 (M\$)\*

<b>1</b>	REVENUE
<b>-1</b>	PROFIT BEFORE TAX
<b>0</b>	EMPLOYEES
<b>0</b>	CIT ACCRUED



At the end of 2020, TotalEnergies owned 2 consolidated affiliates incorporated in the Cayman Islands. The first one, Sunpower Philippines Ltd, is part of a US listed group of companies in which TotalEnergies holds 51,6%. The income of this entity is subject to tax in France in application of the French provisions tackling privileged tax regimes. The second one, TotalEnergies E&P Waha, was recently acquired from a third party and is under the process of repatriation to France. This entity has no revenue at its head office in the Cayman Islands and performs upstream operations in Libya. All its revenues are subject to tax in Libya according to the local tax legislation.

\*Key figures as reported in our country-by-country tax reporting (see section 5).

## OUR PRESENCE IN...

### Luxembourg

#### KEY FIGURES 2020 (M\$)\*

**1,202**  
REVENUE

**22**  
PROFIT BEFORE TAX

**404**  
EMPLOYEES

**18**  
CIT ACCRUED



At the end of 2020, TotalEnergies had one consolidated affiliate in Luxembourg, TotalEnergies Luxembourg, which owns and operates approximately 40 service stations and employs 400 people in the country.

### Malta

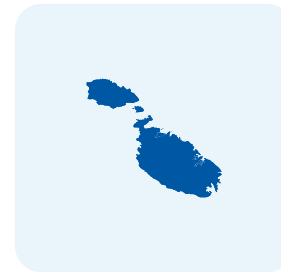
#### KEY FIGURES 2020 (M\$)\*

**11**  
REVENUE

**2**  
PROFIT BEFORE TAX

**160**  
EMPLOYEES

**1**  
CIT ACCRUED



At the end of 2020, TotalEnergies had one consolidated affiliate in Malta, Pamargan (Malta) Products Limited, which is part of the Hutchinson group since 1992 and specializes in the manufacturing of rubber joints for metal pieces. It employs about 200 people.

### The Netherlands

#### KEY FIGURES 2020 (M\$)\*

**2,539**  
REVENUE

**85**  
PROFIT BEFORE TAX

**1,757**  
EMPLOYEES

**-8**  
CIT ACCRUED



TotalEnergies has been present in the Netherlands for more than 50 years and operates locally in all business segments of the energy industry. Around 1750 employees work for the various TotalEnergies companies conducting business in the Netherlands. Moreover, TotalEnergies has incorporated a number of exploration and production affiliates in the Netherlands in order to benefit from the possibility to hold their statutory accounts in US Dollars and so mitigate the Company's foreign exchange exposure. These entities rely on the well-established technical oil & gas competencies available in the country.

\*Key figures as reported in our country-by-country tax reporting (see section 5).

## Our View on Key Tax Matters



### 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 transfer pricing documentations in compliance with applicable laws and regulations, and are subject to audit by the tax authorities of our host countries.

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.

## ON TAX INCENTIVES

TotalEnergies' projects are long term, capital intensive and high-risk investments. The Company may thus 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.

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 these situations, the Company encourages governments to publish the fiscal 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 granted during the exploration and development phases when the Company derives no income (e.g., longer carry forward period for losses, accelerated depreciation). Such early phase tax incentives should be weighed against the royalties and the higher corporate tax rates that generally apply to the industry when production phase is reached.

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.

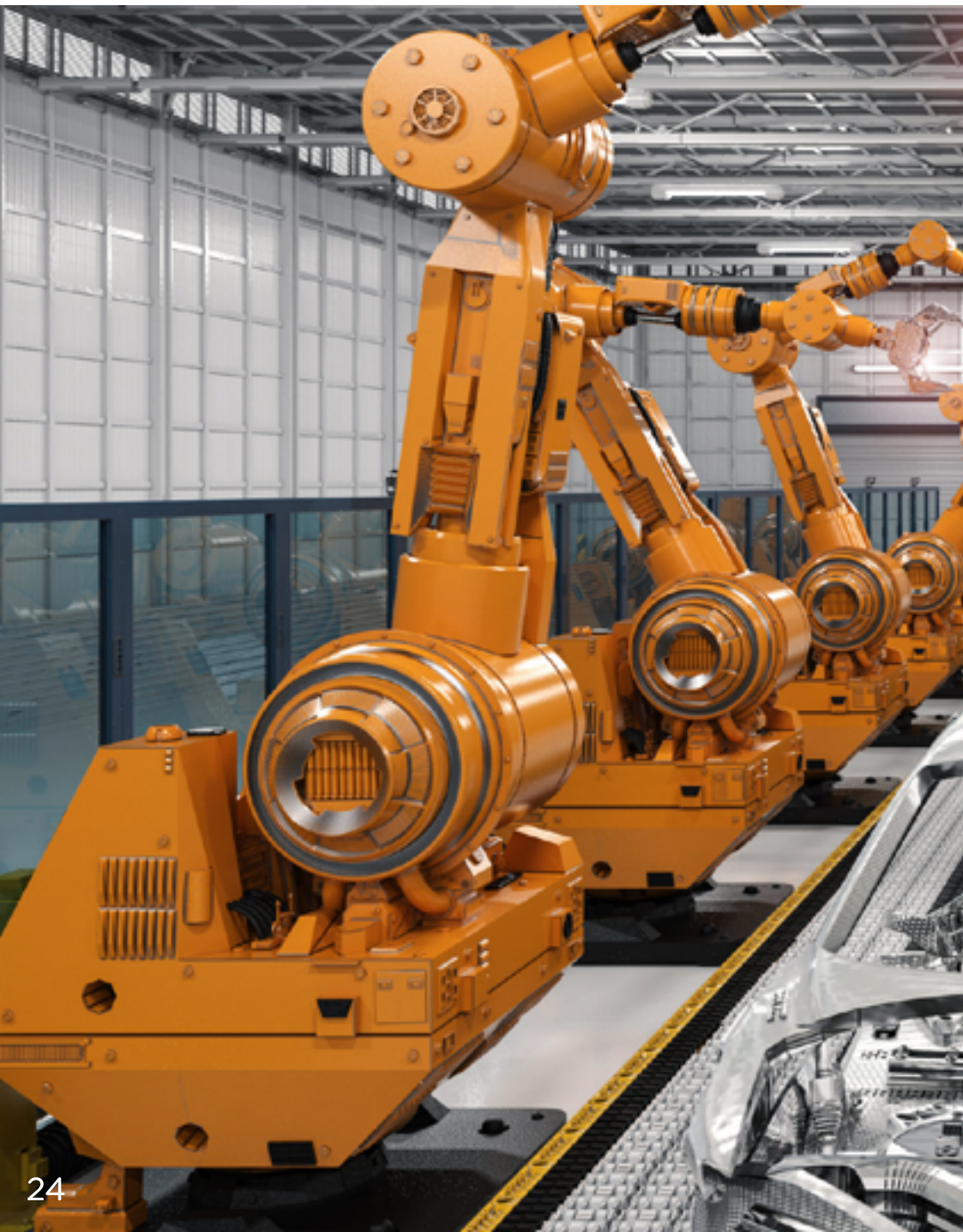


## ON PUBLIC POLICY AND ADVOCACY RELATING TO TAX MATTERS

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.

As for tax matters, TotalEnergies fully supports initiatives for greater transparency and accountability. It has been a permanent member 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.





# 3

## Our Total Tax Contribution



# Our Total Tax Contribution

## WHAT IS THE TOTAL TAX CONTRIBUTION (TTC)?

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.

It provides a more complete and accurate information than focusing only on corporate income tax, which represents on average around 10% of the total tax revenues of countries according to the OECD's Revenue Statistics 2020. 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?

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.

### 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 taxes on property transactions and ownership.

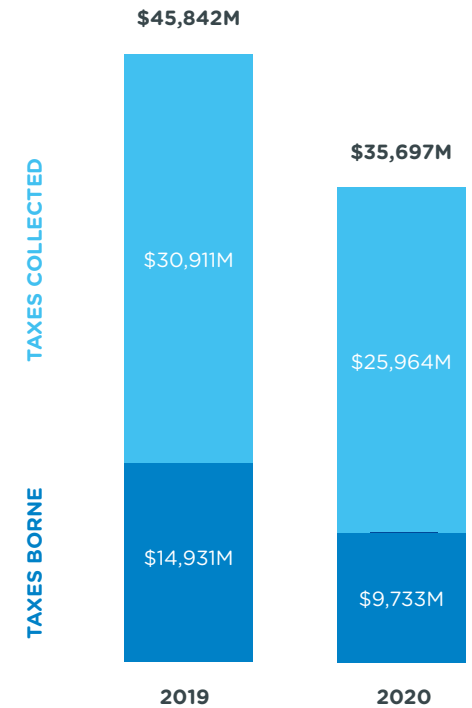
### OUR TTC AT A GLANCE

We made payments to tax authorities in 110 countries in respect of profits, employment, production and sales.

This chapter details the Total Tax Contribution in our 40 main countries of operations. These countries account for more than 90% of our corporate income tax (both paid and accrued) as reported in our 2019 Country-by-Country Reporting.

Due to the Covid-19 pandemic, 2020 is an exceptional year, during which our TTC drastically fell (especially taxes related to profits and sales) due to the fall in our income and in the price of energy products sold. 2020 cannot therefore be viewed as representative of TotalEnergies tax contribution. Disclosing information on 2019 also allows our stakeholders to measure the evolution of key indicators and thus contributes to a better understanding of our global tax position. Once our 2021 country-by-country tax reporting is filed, 2021 data will be shared.

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



#### Effective Tax Rate (ETR)

##### AT COMPANY LEVEL

TotalEnergies' effective tax rate (total corporate income tax accrued divided by total pre-tax profit as reported in our CbCR) was 38.7% in 2019. (The 2020 ratio is negative and therefore irrelevant, given the net consolidated loss incurred in 2020.) This effective tax rate is substantially higher than the average OECD combined statutory tax rates for 2019 (20.7%) (Corporate Tax Statistics, first and second editions, OECD).

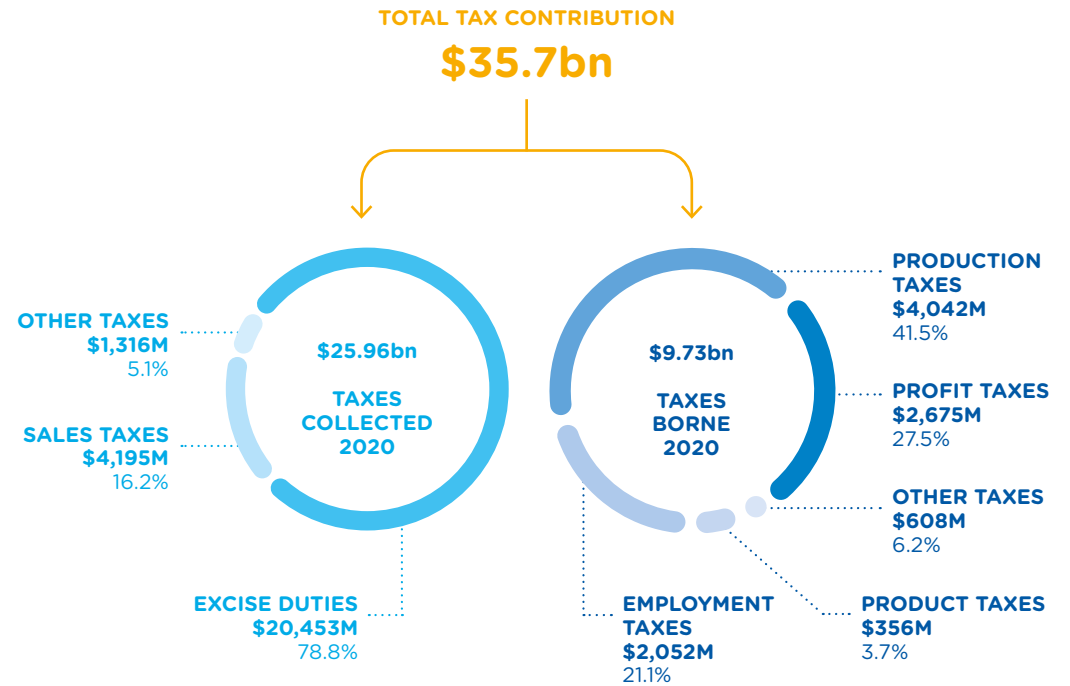
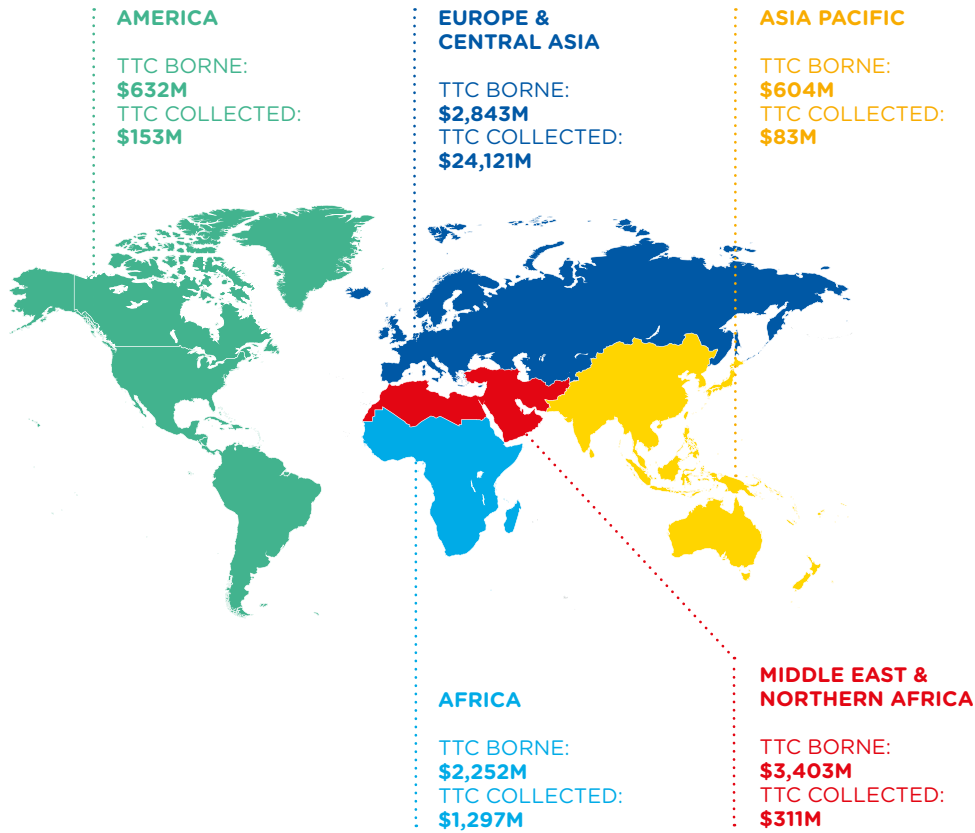
##### AT COUNTRIES' LEVEL

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.

A higher ETR 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 our affiliates in one country is a loss, while some entities are profitable and incur a corporate income tax charge.

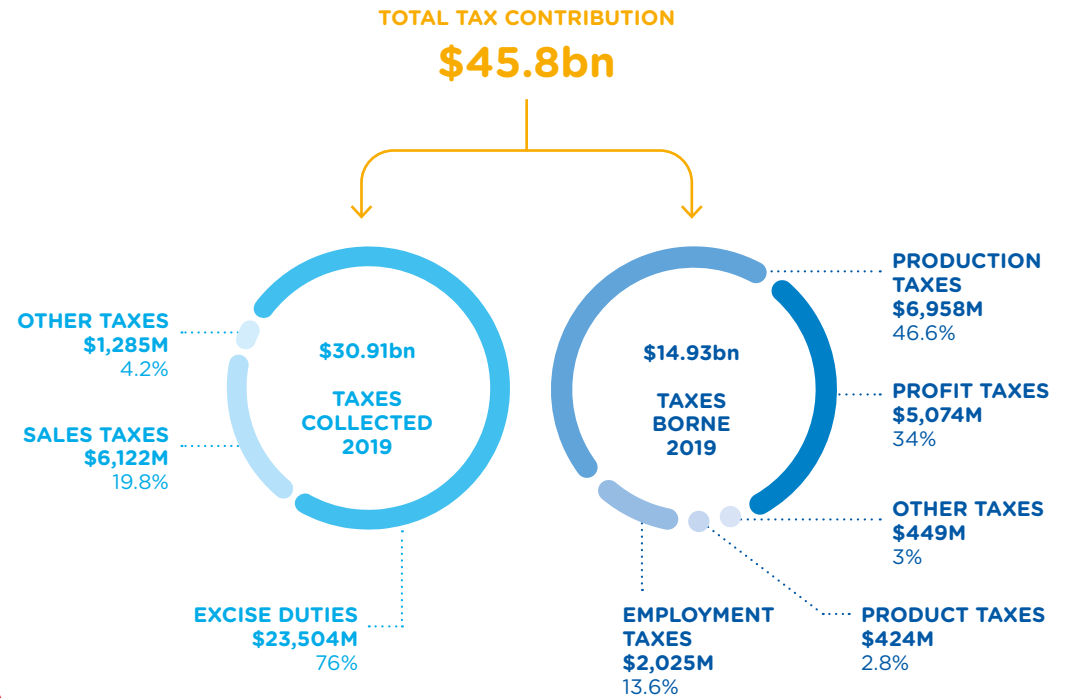
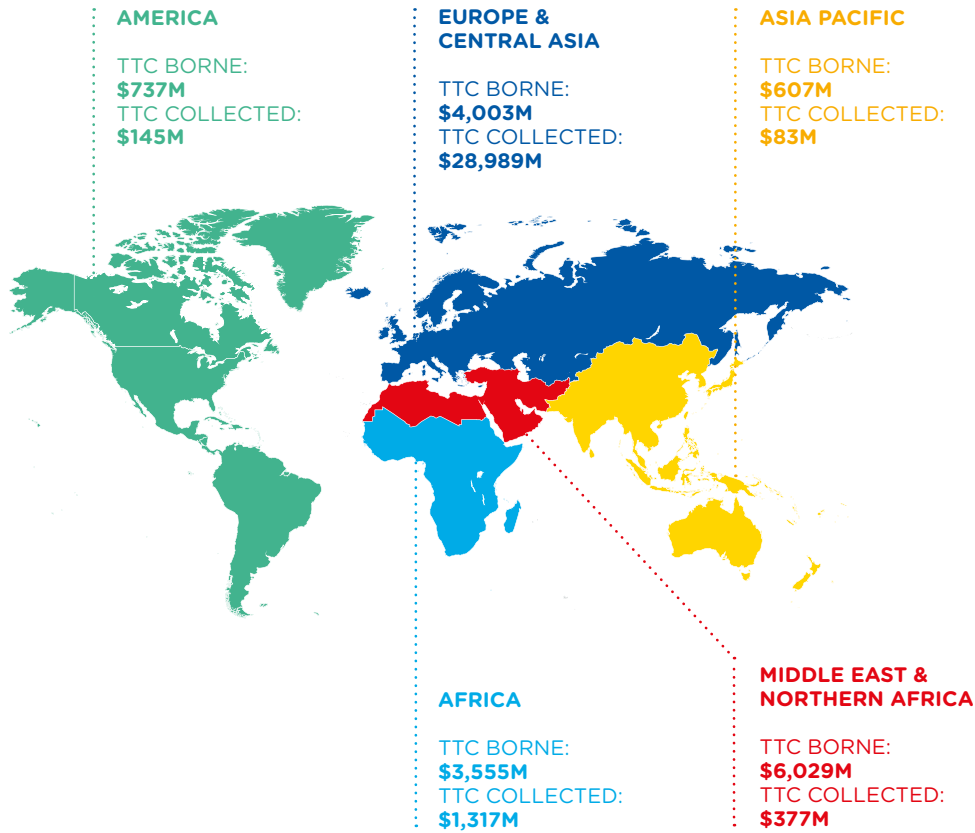
**OUR TTC IN 2020**

In 2020, TotalEnergies contributed \$35.7bn to the public finances of our main countries of operations, made up of \$9.7bn in taxes borne and \$26bn in taxes collected on behalf of tax authorities.



**OUR TTC IN 2019**

In 2019, TotalEnergies contributed \$45.8bn to the public finances of our main countries of operations, made up of \$14.9bn in taxes borne and \$30.9bn in taxes collected on behalf of tax authorities.





# 4

## Our Extractive Industries Report

- › 2020
- › 2019

# Our Extractive Industries Report of Payments to Governments

TotalEnergies publishes a report every year in its Universal Registration Document (section 9.3.), which covers the payments (made 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.

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 added value 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 entitlement, which is the host Government's share of production.

**To mark our engagement for tax transparency, the Company has decided to voluntarily provide additional tax information beyond mandatory disclosures. Given the particular interest of civil society in Corporate Income Taxes\*, we are disclosing below corporate income tax payments by country, separately from other tax payments. This is a material disclosure since corporate income tax paid by our extractive entities accounts for more than 78% of TotalEnergies' corporate income tax payment, all activities included, in 2020 and more than 86% in 2019 (per our country-by-country reporting).**

\*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.

2020

\$k	CORPORATE INCOME TAX	OTHER TAXES	TOTAL TAXES PAID	ROYALTIES	LICENSE FEES	LICENSE BONUS	DIVIDENDS	INFRA- STRUCTURE IMPROVEMENTS	PRODUCTION ENTITLEMENTS	TOTAL OF PAYMENTS
<b>AFRICA</b>	<b>1,047,084</b>	<b>476,221</b>	<b>1,523,305</b>	-	<b>63,049</b>	<b>350,106</b>	<b>62,371</b>	<b>33,522</b>	<b>932,587</b>	<b>2,964,940</b>
Angola	403,791	99,090	<b>502,881</b>	-	11,698	350,053	-	-	907,577	<b>1,772,209</b>
Gabon	25,524	67,405	<b>92,929</b>	-	4,412	-	62,371	16,160	-	<b>175,872</b>
Ivory Coast	-	-	-	-	1,686	-	-	-	-	<b>1,686</b>
Kenya	-	-	-	-	94	-	-	54	-	<b>148</b>
Mauritania	-	-	-	-	2,442	-	-	-	-	<b>2,442</b>
Mozambique	-	-	-	-	1,060	-	-	-	-	<b>1,060</b>
Nigeria	517,079	99,114	<b>616,193</b>	-	15,748	-	-	14,492	24,283	<b>670,716</b>
Republic of Congo	100,690	210,612	<b>311,302</b>	-	14,817	53	-	2,599	727	<b>329,498</b>
São Tomé and Príncipe	-	-	-	-	181	-	-	-	-	<b>181</b>
Senegal	-	-	-	-	1,119	-	-	217	-	<b>1,336</b>
South Africa	-	-	-	-	617	-	-	-	-	<b>617</b>
Uganda	-	-	-	-	9,175	-	-	-	-	<b>9,175</b>
<b>AMERICAS</b>	<b>26,655</b>	<b>317,199</b>	<b>343,854</b>	<b>40,528</b>	<b>49,536</b>	<b>11,632</b>	-	<b>171</b>	<b>23,465</b>	<b>469,186</b>
Argentina	26,655	55,781	<b>82,436</b>	-	3,900	4,066	-	-	-	<b>90,402</b>
Bolivia	-	194,918	<b>194,918</b>	-	1,327	5,162	-	171	12,551	<b>214,129</b>
Brazil	-	51,416	<b>51,416</b>	-	1,112	-	-	-	10,914	<b>63,442</b>
Canada	-	-	-	9,253	22,589	-	-	-	-	<b>31,842</b>

2020 \$k	CORPORATE INCOME TAX	OTHER TAXES	TOTAL TAXES PAID	ROYALTIES	LICENSE FEES	LICENSE BONUS	DIVIDENDS	INFRA- STRUCTURE IMPROVEMENTS	PRODUCTION ENTITLEMENTS	TOTAL OF PAYMENTS
French Guyana (FR)	-	-	-	-	2,171	-	-	-	-	2 171
Guyana	-	-	-	-	164	-	-	-	-	164
Mexico	-	5,179	5,179	-	14,557	-	-	-	-	19 736
United States	-	9,905	9,905	31,275	3,716	2,404	-	-	-	47 300
<b>ASIA PACIFIC</b>	<b>405,588</b>	<b>80,297</b>	<b>485,885</b>	-	<b>333</b>	<b>46,935</b>	-	-	<b>174,817</b>	<b>707,970</b>
Australia	-	13,641	13,641	-	-	-	-	-	-	13,641
Brunei	55,108	19,032	74,140	-	5	-	-	-	3,269	77,414
China	-	16,898	16,898	-	-	-	-	-	27,547	44,445
Indonesia	3,768	1 758	5,526	-	-	-	-	-	5,466	10,992
Myanmar	9,200	28,106	37,306	-	-	-	-	-	138,535	175,841
Papua New Guinea	-	-	-	-	328	-	-	-	-	328
Thailand	337,512	862	338,374	-	-	46,935	-	-	-	385,309
<b>EUROPE, CENTRAL ASIA</b>	<b>484,771</b>	<b>73,012</b>	<b>557,783</b>	-	<b>27,085</b>	<b>2,304</b>	-	<b>12,261</b>	<b>46,617</b>	<b>646,050</b>
Bulgaria	-	-	-	-	300	-	-	-	-	300
Denmark	-32,054	784	-31,270	-	8,639	-	-	-	-	-22,631
Greece	-	-	-	-	424	-	-	-	-	424
Italy	-	2,804	2,804	-	1,252	-	-	-	-	4,056



2020 \$k	CORPORATE INCOME TAX	OTHER TAXES	TOTAL TAXES PAID	ROYALTIES	LICENSE FEES	LICENSE BONUS	DIVIDENDS	INFRA- STRUCTURE IMPROVEMENTS	PRODUCTION ENTITLEMENTS	TOTAL OF PAYMENTS
Kazakhstan	-	10,843	<b>10,843</b>	-	35	2,304	-	12,261	27,033	<b>52,476</b>
Norway	453,708	54,624	<b>508,332</b>	-	4,843	-	-	-	-	<b>513,175</b>
Russia	7,970	3,957	<b>11,927</b>	-	78	-	-	-	19,584	<b>31,589</b>
The Netherlands	11,286	-	<b>11,286</b>	-	1,271	-	-	-	-	<b>12,557</b>
United Kingdom	43,861	-	<b>43,861</b>	-	10,243	-	-	-	-	<b>54,104</b>
<b>MIDDLE EAST NORTH AFRICA</b>	<b>343,931</b>	<b>3,135,152</b>	<b>3,479,083</b>	-	<b>17,559</b>	<b>15,554</b>	-	-	<b>878,819</b>	<b>4,391,015</b>
Algeria	98,755	147,508	<b>246,263</b>	-	3,219	2,384	-	-	-	<b>251,866</b>
Cyprus	-	-	-	-	990	-	-	-	-	<b>990</b>
Egypt	-	-	-	-	781	778	-	-	-	<b>1,559</b>
Iraq	13,234	7,724	<b>20,958</b>	-	-	-	-	-	-	<b>20,958</b>
Lebanon	-	-	-	-	210	-	-	-	-	<b>210</b>
Libya	137,502	129,070	<b>266,572</b>	-	226	-	-	-	401,143	<b>667,941</b>
Oman	1,254	138,787	<b>140,041</b>	-	280	12,392	-	-	7,222	<b>159,935</b>
Qatar	93,186	8,914	<b>102,100</b>	-	-	-	-	-	470,454	<b>572,554</b>
United Arab Emirates	-	2,703,149	<b>2,703,149</b>	-	11,853	-	-	-	-	<b>2,715,002</b>
<b>Total</b>	<b>2,308,029</b>	<b>4,081,881</b>	<b>6,389,910</b>	<b>40,528</b>	<b>157,562</b>	<b>426,531</b>	<b>62,371</b>	<b>45,954</b>	<b>2,056,305</b>	<b>9,179,161</b>

2019

\$k	CORPORATE INCOME TAX	OTHER TAXES	TOTAL TAXES PAID	ROYALTIES	LICENSE FEES	LICENSE BONUS	DIVIDENDS	INFRA- STRUCTURE IMPROVEMENTS	PRODUCTION ENTITLEMENTS	TOTAL OF PAYMENTS
<b>AFRICA</b>	<b>1,645,359</b>	<b>757,527</b>	<b>2,402,886</b>	-	<b>70,226</b>	<b>73,929</b>	<b>12,375</b>	<b>87,398</b>	<b>1,765,741</b>	<b>4,412,555</b>
Angola	646,657	129,044	<b>775,701</b>	-	9,976	5,068	-	10,000	1,631,198	<b>2,431,943</b>
Gabon	34,677	141,340	<b>176,017</b>	-	4,736	-	12,375	28,269	-	<b>221,397</b>
Ivory Coast	-	-	-	-	1,729	4,500	-	-	-	<b>6,229</b>
Kenya	-	-	-	-	378	-	-	54	-	<b>432</b>
Mauritania	-	-	-	-	2,821	40,000	-	-	-	<b>42,821</b>
Namibia	-	-	-	-	161	-	-	-	-	<b>161</b>
Nigeria	722,262	97,171	<b>819,433</b>	-	19,302	-	-	48,725	132,045	<b>1,019,505</b>
Republic of Congo	241,763	389,972	<b>631,735</b>	-	29,303	12,743	-	-	2,498	<b>676,279</b>
São Tomé and Príncipe	-	-	-	-	-	1,618	-	-	-	<b>1,618</b>
Senegal	-	-	-	-	1,119	10,000	-	350	-	<b>11,469</b>
South Africa	-	-	-	-	112	-	-	-	-	<b>112</b>
Uganda	-	-	-	-	589	-	-	-	-	<b>589</b>
<b>AMERICAS</b>	<b>14,621</b>	<b>311,573</b>	<b>326,194</b>	<b>91,732</b>	<b>47,617</b>	<b>423,081</b>	-	<b>293</b>	<b>47,868</b>	<b>936,785</b>
Argentina	12,699	82,344	<b>95,043</b>	-	4,941	753	-	-	-	<b>100,737</b>
Bolivia	-	173,446	<b>173,446</b>	-	1,178	6,931	-	293	24,270	<b>206,118</b>
Brazil	300	39,500	<b>39,800</b>	-	904	395,446	-	-	23,598	<b>459,748</b>
Canada	-	-	-	37,052	30,352	-	-	-	-	<b>67,404</b>

2019 \$k	CORPORATE INCOME TAX	OTHER TAXES	TOTAL TAXES PAID	ROYALTIES	LICENSE FEES	LICENSE BONUS	DIVIDENDS	INFRA- STRUCTURE IMPROVEMENTS	PRODUCTION ENTITLEMENTS	TOTAL OF PAYMENTS
Colombia	1,122	2,506	<b>3,628</b>	722	-	-	-	-	-	<b>4,350</b>
Mexico	-	5,486	<b>5,486</b>	-	4,209	-	-	-	-	<b>9,695</b>
United States	500	8,291	<b>8,791</b>	53,958	6,033	19,951	-	-	-	<b>88,733</b>
<b>ASIA PACIFIC</b>	<b>386,046</b>	<b>94,262</b>	<b>480,308</b>	-	<b>217</b>	<b>52,933</b>	-	-	<b>220,094</b>	<b>753,552</b>
Australia	-	13,830	<b>13,830</b>	-	-	-	-	-	-	<b>13,830</b>
Brunei	38,734	27,523	<b>66,257</b>	-	5	-	-	-	4,879	<b>71,141</b>
China	-	14,078	<b>14,078</b>	-	-	-	-	-	26,878	<b>40,956</b>
Indonesia	5,525	2,592	<b>8,117</b>	-	-	-	-	-	9,747	<b>17,864</b>
Myanmar	15,247	35,760	<b>51,007</b>	-	-	-	-	-	178,590	<b>229,597</b>
Papua New Guinea	-	-	-	-	212	-	-	-	-	<b>212</b>
Thailand	326,540	479	<b>327,019</b>	-	-	52,933	-	-	-	<b>379,952</b>
<b>EUROPE, CENTRAL ASIA</b>	<b>1,623,827</b>	<b>35,216</b>	<b>1,659,043</b>	-	<b>26,014</b>	<b>4,020</b>	-	<b>13,217</b>	<b>84,529</b>	<b>1,786,823</b>
Bulgaria	-	-	-	-	160	-	-	-	-	<b>160</b>
Denmark	232,173	-	<b>232,173</b>	-	8,938	-	-	-	-	<b>241,111</b>
Greece	-	-	-	-	397	1,344	-	-	-	<b>1,741</b>
Italy	-	-	-	-	782	-	-	-	-	<b>782</b>

2019 \$k	CORPORATE INCOME TAX	OTHER TAXES	TOTAL TAXES PAID	ROYALTIES	LICENSE FEES	LICENSE BONUS	DIVIDENDS	INFRA- STRUCTURE IMPROVEMENTS	PRODUCTION ENTITLEMENTS	TOTAL OF PAYMENTS
Kazakhstan	-	26,466	<b>26,466</b>	-	31	2,676	-	13,217	41,224	<b>83,614</b>
Norway	1,049,079	-	<b>1,049,079</b>	-	4,942	-	-	-	-	<b>1,054,021</b>
Russia	11,681	8,750	<b>20,431</b>	-	76	-	-	-	43,305	<b>63,812</b>
The Netherlands	28,971	-	<b>28,971</b>	-	1,212	-	-	-	-	<b>30,183</b>
United Kingdom	301,923	-	<b>301,923</b>	-	9,476	-	-	-	-	<b>311,399</b>
<b>MIDDLE EAST NORTH AFRICA</b>	<b>822,132</b>	<b>5,655,025</b>	<b>6,477,157</b>	-	<b>9,505</b>	<b>34,035</b>	-	-	<b>1,887,982</b>	<b>8,408,679</b>
Algeria	219,645	282,327	<b>501,972</b>	-	1,725	11,892	-	-	-	<b>515,589</b>
Cyprus	-	-	-	-	628	4,421	-	-	-	<b>5,049</b>
Iraq	7,590	11,944	<b>19,534</b>	-	-	-	-	-	-	<b>19,534</b>
Libya	453,154	50,104	<b>503,258</b>	-	239	-	-	-	1,224,801	<b>1,728,298</b>
Oman	3,460	273,148	<b>276,608</b>	-	-	-	-	-	20,763	<b>297,371</b>
Qatar	138,283	20,299	<b>158,582</b>	-	-	-	-	-	642,418	<b>801,000</b>
United Arab Emirates	-	5,017,203	<b>5,017,203</b>	-	6,913	17,722	-	-	-	<b>5,041,838</b>
<b>Total</b>	<b>4,491,985</b>	<b>6,853,603</b>	<b>11,345,588</b>	<b>91,732</b>	<b>153,579</b>	<b>587,998</b>	<b>12,375</b>	<b>100,908</b>	<b>4,006,214</b>	<b>16,298,394</b>



# 5

## Country-by-Country Information

- › 2020
- › 2019

## Country-by-country information



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 1,500 entities in over 130 jurisdictions.

The CbCR filed in France is 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, as of 2024, 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.

As a further step in its commitment to greater tax transparency, TotalEnergies has decided to voluntarily publish its CbCR data in the form required by the EU Directive, two years ahead of its entry into force. In addition, capitalizing on its long-standing transparency practice in the extractive industry, TotalEnergies also provides below its CbCR data relating to all countries in which it conducts extractive activities.

Altogether, this information covers 95% of its corporate income tax paid in 2019 and 86% in 2020.

*Note that the Company referred to the EU black and grey lists of Non Cooperative Countries available when preparing this report (i.e. published on October 5, 2021). TotalEnergies assessed reportable presence in the following countries:*

*- black listed countries: Fiji*

*- grey listed countries for at least 2 years: Australia, Botswana, Jordan, Thailand and Turkey.*

*The company decided to add information relating to Bermuda, the Cayman Islands and the British Virgin Islands, where it has presence.*

**GLOSSARY**

**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.

**REVENUE**

The CbC 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 associated enterprises.

**TANGIBLE ASSETS**

The CbC 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 follows the presentation applied in our Financial Statements.

The CbC template includes two CIT amounts that may be very different:

CIT paid (in cash or in hydrocarbon during the year) and CIT accrued, as shown in the 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).

None of them include deferred taxes. Withholding taxes on intercompany payments are reported in the country of source.

**PROFIT BEFORE TAX**

Profit before tax is based on TotalEnergie's consolidated financial statements. This is different to 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.

2020

\$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
<b>COUNTRIES</b>												
<b>EU countries</b>												
Austria	MS	177,929	531	178,460	6,768	1,567	1,716	912	2,390	50	3,155	
Belgium	GRP MS RC	11,398,015	7,534,247	18,932,263	-154,874	42,792	34,805	7,052,871	8,103,898	5,144	3,225,365	
Bulgaria	EP MS	18,818	1,333	20,151	-11,530	336	340	587	-	27	49,093	
Croatia	MS	6,683	-	6,683	1,076	-195	-	94	-	2	268	
Cyprus	EP GRP	9,767	-	9,767	-11,108	184	184	-	-	17	57,735	
Denmark	EP MS SCC	98,507	408,089	506,596	-163,571	-29,765	-53,168	74,435	2,799,912	1,665	1,644,491	
Estonia	MS	709	4,768	5,477	-398	-	-	730	-312	9	1,360	
Finland	MS	15,008	-	15,008	1,460	240	294	228	11	2	15	
France	EP GRP MS RC SCC	34,018,402	28,520,895	62,539,297	-1,111,861	-255,791	5,721	79,453,680	102,150,848	36,740	9,332,019	The French consolidated tax group accrued a global tax loss in 2020. CIT accrued corresponds to the income tax charge incurred by non-tax consolidated entities. Following the cancellation of the French worldwide tax consolidation regime in 2010, TotalEnergies reassessed the CIT paid during previous fiscal years. This process showed that overpayments of CIT had been made and resulted in CIT refunds in 2020.
Germany	EP GRP MS RC	15,086,097	12,868,118	27,954,214	-89,119	159,143	73,786	1,209,594	3,036,041	5,229	1,882,520	

\*Does not include the activities of entities outside the scope of CbCR.

\*\*Activities reported are performed by a foreign operational branch (see section 2, p18).

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



2020 \$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
Greece	EP MS	15,193	1,317	16,510	-3,521	230	352	747	696	42	183	
Hungary	MS	65,016	3,901	68,917	4,875	423	165	1,967	3,057	45	10,740	
Ireland	MS SCC	2,285	648	2,933	7,606	1,257	1,237	36,813	21,518	-	-	Income subject to CIT in France under French Controlled Foreign Corporation rules tackling low tax regimes.
Italy	EP GRP MS RC	384,065	131,797	515,862	-5,419	296	-1,557	15,438	17,585	751	1,968,686	
Lithuania	MS	14,481	-	14,481	3,376	-3	1,000	3,969	642	21	1,689	
Luxembourg	GRP MS	1,202,228	242	1,202,470	21,781	9,313	17,899	13,573	5,021	404	51,074	Exceptional CIT incurred relating to pre-acquisition operations of newly acquired affiliate.
Malta	GRP RC	3	10,603	10,606	2,102	-	750	15	3,692	160	3,530	
Poland	MS RC	917,237	85,687	1,002,924	37,866	12,330	18,968	29,637	86,230	9,319	212,475	Book to tax differences.
Portugal	MS RC	130,163	57,171	187,334	23,185	6,839	5,311	8,222	20,381	2,225	38,962	
Rep. Czech	GRP MS RC	506,920	15,195	522,115	9,644	2,847	3,981	12,393	14,828	1,361	50,071	
Romania	MS RC SCC	190,432	42,180	232,612	12,457	1,843	2,469	30,839	3,309	1,661	37,252	
Slovakia	MS	19,048	591	19,639	2,097	491	508	615	561	11	5,938	
Slovenia	MS	31,447	666	32,113	1,237	8	134	239	-	6	257	
Spain	GRP MS RC	1,019,013	20,073	1,039,086	6,723	525	-142	448,698	285,576	1,793	308,616	
Sweden	GRP MS	144,231	44	144,275	25,346	5,652	5,364	175	276	488	21,488	
The Netherlands	EP GRP MS RC SCC	1,859,886	678,948	2,538,834	84,922	15,338	-7,604	36,834,975	9,154,205	1,757	723,448	Carry-back of tax losses and impact of tax consolidation rules.

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

2020 \$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
<b>Non-Cooperative and other controversial countries</b>												
Australia	EP GRP MS	1,196,508	668,996	1,865,504	-826,350	13,723	13,500	2,911,804	-1,998,835	65	8,040,845	CIT paid and accrued corresponds to withholding taxes levied on intra-group transactions.
Bermuda**	EP GRP	3,000	-	3,000	1,358	-	-	-	-154,845	-	-	
Botswana	MS	28,679	-	28,679	175	87	-	93	7,593	13	10,279	No CIT accrued due to the carryforward of former tax losses.
Cayman Islands**	EP GRP	1,281	-	1,281	-958	-	-	451,000	1,000	-	-	
Fiji	MS	146,933	6,469	153,402	2,772	462	462	2,955	17,237	114	42,355	
Jordan	MS	311,706	1,411	313,117	-21,160	-	-	81,807	4,168	131	104,374	
Thailand	EP GRP MS	770,475	482	770,957	541,463	338,171	285,000	11,944	-13,439	83	194,163	
Turkey	MS RC	61,801	87,165	148,965	15,650	2,030	1,889	19,691	69,753	529	10,671	
<b>Other countries where we conduct extractive activities</b>												
Algeria	EP MS	385,923	217,260	603,183	46,716	100,558	101,062	2,356	24,093	200	626,211	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Algeria, thus increasing the apparent ETR in the country.
Angola	EP	47,000	2,686,702	2,733,702	117,720	403,791	328,000	-	-	1,544	8,997,000	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Angola, thus increasing the apparent ETR in the country.

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Argentina	EP GRP MS	534,194	-	534,194	4,595	30,655	11,989	88,191	22,154	1,183	1,067,581	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. These differences resulted in an apparent high ETR.
Bolivia	EP	332,000	-	332,000	-48,000	-	-	-	-	167	590,000	
Brazil	EP GRP MS RC	720,000	481,528	1,201,528	-373,286	64,299	62,956	1,909,291	-1,257,303	3,079	3,885,518	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Brazil, thus resulting in an apparent negative ETR in the country.
Brunei	EP	102,000	20,000	122,000	41,000	55,108	41,000	-	-	74	295,000	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. These differences result in an apparent high ETR in the country.
Canada	EP MS RC	1,643,495	3,218,177	4,861,672	-7,596,732	-467	-	7,379,282	-15,436,287	307	2,597,670	
China	EP GRP MS RC	1,273,446	45,387	1,318,833	164,055	18,058	35,055	359,838	-132,427	3,935	537,294	
Egypt	EP MS	1,298,157	11,218	1,309,375	-3,246	9,589	9,571	90,126	67,528	251	161,585	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Egypt, thus resulting in an apparent negative ETR in the country.
Gabon	EP MS	295,598	348,958	644,556	-257,432	29,633	56,461	87,607	1,805,218	428	2,403,573	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules (e.g. non tax deductibility of some accounting asset depreciation). As a result of these differences, TotalEnergies accrued a global accounting loss in 2020 but a positive taxable profit. Additional differences between accounting and tax data result from the absence of tax consolidation in the country.

\*Does not include the activities of entities outside the scope of CbCR.

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2020 \$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
Guyana	EP	-	-	-	-44,000	-	-	-	-	1	35,000	
Indonesia	EP MS	61,673	-	61,673	3,960	2,554	5,000	38,963	-48,154	72	15,633	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Indonesia, thus increasing the apparent ETR in the country.
Iraq	EP	44,000	116,000	160,000	23,000	13,234	10,000	-	-	2	135,000	
Ivory Coast	EP MS	943,030	3,312	946,342	4,970	6,150	4,931	22,549	26,489	178	120,485	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Ivory Coast, thus increasing the apparent ETR in the country.
Kazakhstan	EP MS	119,631	689,000	808,631	-218,258	678	-4,360	203	1,696	375	9,874,020	
Kenya	EP MS	1,018,517	42,706	1,061,223	39,010	14,069	12,113	127,425	158,915	392	223,763	
Lebanon	EP MS	387,000	-	387,000	-30,000	-	1,000	6,000	2,000	125	52,000	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies accrued a global accounting loss in 2020 but a positive taxable profit.
Libya	EP	299,000	223,000	522,000	369,000	137,502	138,000	-	-	27	591,000	
Mauritania	EP MS	61,319	-	61,319	-21,195	-2,585	1,696	3,293	2,680	66	6,159	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. This resulted in a global accounting loss. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Mauritania, thus resulting in an apparent negative ETR in the country.

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Mexico	EP GRP MS RC	972,096	531,686	1,503,782	-26,851	22,356	11,193	57,833	-171,577	6,810	159,352	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. This resulted in a global accounting loss. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Mexico, thus resulting in an apparent negative ETR in the country.
Mozambique	EP MS	139,829	5,504	145,333	10,960	4,481	4,222	12,042	20,045	790	1,604,557	
Myanmar	EP	212,000	-	212,000	9,000	9,200	13,000	-	-	308	318,000	Book to tax differences (exploration costs expensed for accounting purposes but not tax deductible).
Nigeria	EP MS	1,207,023	2,392,018	3,599,041	-136,553	522,701	548,712	10,570	7,608,627	2,459	10,550,292	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies accrued a global accounting loss in 2020 but a positive taxable profit. Additional differences between accounting and tax data result from the absence of tax consolidation in the country.
Norway	EP GRP MS	306,021	2,304,038	2,610,059	620,538	454,012	43,751	1,081,047	714,324	94	7,929,334	Reduced amount of CIT accrued due to exceptional accelerated depreciation of assets.
Oman	EP	5,285	398,920	404,205	-7,156	1,254	4,000	-	-	16	3,000	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. As shown in our Extractive Industries report, the global amount of taxes paid in Oman in fiscal year 2020 was \$ 140 M. In addition, book to tax differences resulted in a global accounting loss while the application of tax rules resulted in a taxable profit in the country.
Papua New Guinea	EP	-	-	-	-5,000	-	-	1,000	-92,000	58	549,000	
Qatar	EP	372,000	8,000	380,000	152,000	120,186	77,000	-	-	245	899,000	

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Republic of Congo	EP MS	562,953	1,396,265	1,959,218	-35,187	98,653	113,777	1,645,019	1,782,805	918	5,073,556	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies accrued a global accounting loss in 2020 while some entities in the country accrued a taxable profit. Additional differences between accounting and tax data result from the absence of tax consolidation in the country.
Russia	EP GRP MS	172,025	105,036	277,061	9,038	14,684	10,338	483	44,351	246	147,297	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies' accounting income in 2020 was lower than its taxable income. Additional differences between accounting and tax data result from the absence of tax consolidation in the country. These various differences resulted in a high apparent ETR in the country.
Sao Tome and Principe	EP	-	-	-	-4,000	-	-	-	-	-	-	
Senegal	EP MS	609,733	59,619	669,352	-1,188	7,349	2,654	6,095	38,294	274	97,995	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. This resulted in a global accounting loss. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Senegal, thus resulting in an apparent negative ETR in the country.
South Africa	EP GRP MS	2,214,915	75,641	2,290,556	-69,913	643	594	64,195	595,325	851	825,843	
Uganda	EP MS	403,360	2,087	405,447	4,343	11,451	13,343	3,114	85,598	325	1,779,215	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Uganda, thus resulting in an apparent high ETR in the country.

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United Arab Emirates	EP GRP MS SCC	185,600	3,820,805	4,006,405	558,749	-	30,300	6,446	1,000	412	2,838,994	Most taxes incurred and paid on our extractive activities in the UAE are classified as production taxes in our financial statements following the IFRS accounting standards guidance. As shown in our Extractive Industries report, the global amount of taxes paid in the UAE was \$ 2,703 M in 2020.
United Kingdom	EP GRP MS RC	6,416,563	2,115,715	8,532,279	-740,941	102,484	87,404	6,649,513	2,941,111	2,456	3,579,013	Book to tax differences resulting from an accelerated tax depreciation of assets. Additional differences between accounting and tax data result from the absence of complete tax consolidation in the country. These various differences resulted in an apparent negative ETR in the country.
United States	EP GRP RC SCC	10,825,044	12,021,568	22,846,612	-443,644	-44,225	10,372	19,294,459	-5,873,136	7,352	7,028,402	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in the USA since TotalEnergies owns several tax consolidated subgroups in the country. Various book to tax differences trigger additional variations of the country's ETR.
Rest of the world		41,375,716	35,115,681	76,491,396	2,138,781	417,137	308,796	1,413,064	11,063,383	12,439	6,199,811	
<b>TOTAL</b>		<b>145,398,114</b>	<b>119,607,400</b>	<b>265,005,514</b>	<b>-7,331,081</b>	<b>2,955,564</b>	<b>2,507,296</b>	<b>169,070,742</b>	<b>127,637,748</b>	<b>118,323</b>	<b>109,830,268</b>	

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2019

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<b>COUNTRIES</b>												
<b>EU countries</b>												
Austria	MS	211,676	602	212,278	5,963	1,431	1,518	893	3,713	44	3,285	
Belgium	GRP MS RC	16,147,263	12,998,717	29,145,980	932,317	172,519	194,863	6,474,899	8,880,151	5,044	3,033,286	
Bulgaria	EP MS	9,665	1,180	10,845	-843	116	137	3	-	27	44,938	
Croatia	MS	6,018	-	6,018	894	83	136	94	-259	2	79	
Cyprus	EP GRP	14,183	-	14,183	-2,681	231	226	-	-	28	38,239	
Denmark	EP MS SCC	522,424	910,542	1,432,966	326,349	240,003	139,689	99,000	2,429,339	1,706	1,344,289	
Estonia	MS	944	18,824	19,768	-459	-	-	715	152	10	1,536	
Finland	MS	10,549	-	10,549	662	121	150	224	11	3	21	
France	EP GRP MS RC SCC	45,663,211	42,726,352	88,389,563	147,204	-139,014	-	69,911,884	93,018,378	37,188	7,943,768	The profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules (e.g., on the treatment of foreign exchange gains and losses). As a result of these differences, TotalEnergies accrued a global tax loss in 2019, while the application of accounting rules resulted in a positive profit before tax.  TotalEnergies paid instalments for its 2019 CIT liability based on its 2017 tax profit, in compliance with French tax rules. As the Company eventually accrued a tax loss in 2019, such instalments were refunded.
Germany	EP GRP MS RC	18,665,118	19,027,882	37,693,000	491,577	96,855	99,922	1,076,553	3,096,151	3,993	1,659,790	

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Greece	EP GRP MS	15,829	993	16,822	-1,258	6	481	732	-2,895	36	76	
Hungary	MS	75,364	7,951	83,315	4,580	445	444	2,082	2,985	42	9,662	
Ireland	MS SCC	3,022	464	3,486	-4,865	87	96	33,702	16,407	-	-	Income subject to CIT in France under French Controlled Foreign Corporation rules tackling low tax regimes.
Italy	EP GRP MS RC	850,052	39,366	889,418	-10,844	11,298	6,675	13,290	3,652	648	1,803,748	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies accrued a global accounting loss in 2020 but a positive taxable profit.
Lithuania	MS	40,955	-	40,955	3,567	10	1,119	3,891	619	18	5,113	
Luxembourg	EP GRP MS	1,658,017	1,297	1,659,315	-79,152	5,892	8,865	14,440	-202,648	425	39,009	
Malta	GRP RC	-	10,925	10,925	113	-	-	13	-211,221	177	2,537	No CIT due to the carryforward of former tax losses.
Poland	GRP MS RC	1,079,421	104,740	1,184,161	79,478	18,703	21,672	29,006	84,617	9,352	203,785	Book to tax differences.
Portugal	MS RC	153,744	61,431	215,175	30,855	8,022	7,959	7,550	14,013	1,984	39,345	
Rep. Czech	GRP MS RC	750,368	14,419	764,787	19,853	1,822	4,289	11,738	11,628	1,527	58,432	
Romania	MS RC SCC	225,016	38,856	263,872	17,191	2,623	2,994	28,931	2,943	1,921	37,278	
Slovakia	MS	8,583	615	9,198	457	62	115	8	550	11	6,503	
Slovenia	MS	38,725	414	39,139	1,041	233	213	234	-	6	55	
Spain	GRP MS RC	901,115	60,261	961,377	-11,363	10,080	5,001	113,023	32,412	1,400	56,763	
Sweden	GRP MS	156,346	30	156,376	30,039	5,189	5,726	170	268	534	16,279	
The Netherlands	EP GRP MS RC SCC	2,730,284	1,027,675	3,757,959	340,287	27,008	65,757	36,562,316	7,253,759	1,611	576,947	

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<b>Non-Cooperative and other controversial countries</b>												
Australia	EP GRP MS	1,468,253	722,016	2,190,269	-99,599	24,463	24,221	2,908,772	-1,994,130	61	8,960,614	CIT paid and accrued corresponds to withholding taxes levied on intra-group transactions.
Bermuda**	EP GRP	1,000	-	1,000	-12,021	-	-	6,154	-1,555	-	-	
Botswana	MS	36,155	-	36,155	-651	-93	186	94	8,110	14	9,430	
British Virgin Islands**	EP	-	-	-	-	-	-	654,000	-328,000	-	3,000	All entities present in the BVI have been liquidated or repatriated to France in 2020.
Cayman Islands**	EP GRP	-	-	-	26,685	-	-	1,199,893	-320,264	-	-	Income derived by our entity located in the Cayman Islands, as computed pursuant to French tax rules, is included in TotalEnergies' taxable income in France according to French controlled foreign corporations rules tackling low tax regimes.
Fiji	MS	192,410	11,101	203,510	8,325	1,850	1,850	2,780	20,850	114	35,676	
Jordan	MS	505,889	1,410	507,299	5,642	1,410	1,410	81,804	2,757	135	117,065	
Thailand	EP MS	942,190	4,376	946,566	636,514	327,242	353,000	6,509	-16,817	84	430,155	
Turkey	GRP MS RC	67,615	4,402	72,017	4,717	-352	352	24,469	67,315	129	13,230	
<b>Other countries where we conduct extractive activities</b>												
Algeria	EP MS	693,500	321,590	1,015,090	364,122	221,513	221,044	2,513	25,746	187	723,868	
Angola	EP GRP MS	-525,000	5,451,465	4,926,465	1,414,283	646,657	791,000	116,899	-70,872	1,649	11,357,320	

\*Does not include the activities of entities outside the scope of CbCR.

\*\*Activities reported are performed by a foreign operational branch (see section 2, p18).

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

2019 \$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
Argentina	EP GRP MS	814,983	-	814,983	18,224	14,699	-	81,536	17,626	1,263	1,205,443	No CIT accrued due to the offset of undue CIT recorded in prior period.
Bolivia	EP	344,000	1,000	345,000	12,000	-	-	-	-	174	705,000	No CIT due to the carryforward of former tax losses.
Brazil	EP GRP MS RC	899,199	234,654	1,133,853	-248,970	1,301	1,083	1,574,454	-1,301,948	3,136	3,660,462	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Brazil.
Brunei	EP	260,000	54,000	314,000	112,000	38,734	50,000	-	-	83	379,000	
Canada	EP GRP MS RC	2,823,536	5,579,300	8,402,836	-84,565	-73	241	7,378,682	7,992,195	400	9,586,394	
China	EP GRP MS RC	1,258,874	48,001	1,306,875	115,087	14,739	19,960	319,663	-57,548	3,877	514,317	
Colombia	EP MS	38,652	409	39,061	-54,578	1,122	1,010	3,780	-1,856	43	4,705	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies accrued a global accounting loss in 2020 but a positive taxable profit.
Gabon	EP MS	329,609	742,880	1,072,489	117,948	39,628	62,316	86,711	2,006,932	398	3,002,020	
Indonesia	EP GRP MS	72,744	31	72,775	11,690	5,525	7,976	40,340	-49,918	160	22,568	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Indonesia, thus increasing the apparent ETR in the country.
Iraq	EP	70,000	406,000	476,000	57,000	7,590	12,000	-	-	4	168,000	

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2019 \$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
Ivory Coast	EP MS	766,848	4,408	771,256	7,719	6,827	6,444	20,644	25,583	176	114,477	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Ivory Coast, thus increasing the apparent ETR in the country.
Kazakhstan	EP MS	175,780	1,112,000	1,287,780	12,823	519	288	217	1,190	370	10,244,053	No CIT due to the carryforward of former tax losses.
Kenya	EP GRP MS	1,505,891	105,771	1,611,662	32,067	11,283	11,910	137,779	149,583	411	220,730	
Libya	EP	503,000	279,000	782,000	655,000	453,154	453,000	-	-	35	306,000	
Mauritania	EP MS	72,722	-	72,722	-6,173	2,093	1,818	3,355	101	73	6,371	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. This resulted in a global accounting loss. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Mauritania, thus resulting in an apparent negative ETR in the country.
Mexico	EP GRP MS RC	1,148,015	411,235	1,559,250	-19,674	23,831	21,363	47,049	-149,534	8,888	147,722	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. This resulted in a global accounting loss. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Mexico, thus resulting in an apparent negative ETR in the country.
Myanmar	EP	267,000	1,000	268,000	47,000	15,247	12,000	-	-	301	345,000	
Namibia	EP MS	128,798	761	129,559	2,222	1,869	1,661	10,823	14,383	36	41,847	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Namibia, thus resulting in an apparent high ETR.

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2019 \$k	MAIN ACTIVITIES*	THIRD PARTY	RELATED PARTY	TOTAL GENERATED REVENUE	PROFIT (LOSS) BEFORE TAX	CORP. INCOME TAXES PAID (REFUNDED)	CORPORATE INCOME TAXES ACCRUED	STATED CAPITAL	ACCUMULATED EARNINGS	NUMBER OF EMPLOYEES	TANGIBLE ASSETS	COMMENTS
Nigeria	EP MS	2,455,227	3,471,497	5,926,724	1,760,278	726,686	781,719	256,677	8,551,944	2,550	11,855,393	
Norway	EP GRP MS	635,991	3,079,068	3,715,059	1,301,116	1,049,271	891,133	1,050,577	516,954	125	7,394,024	
Oman	EP	5,358	662,787	668,145	71,049	3,460	3,000	-	-	12	52,000	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. As shown in our Extractive Industries report, the global amount of taxes paid in Oman in fiscal year 2019 was \$ 277 M.
Papua New Guinea	EP	-	-	-	-19,000	-	-	-	207,000	105	526,000	
Qatar	EP	555,000	13,000	568,000	309,000	138,283	139,000	-	-	236	920,000	
Republic of Congo	EP MS	859,906	2,409,698	3,269,604	1,145,403	243,958	271,422	1,645,017	1,073,793	989	5,770,964	
Russia	EP GRP MS	180,900	159,003	339,902	-17,401	18,314	15,225	626	51,467	233	174,985	Book to tax differences: the profit before tax reported in the CbCR is computed according to IFRS accounting rules, which differ from tax rules. As a result of these differences, TotalEnergies accrued a global accounting loss in 2019 but a positive taxable profit. These various differences resulted in an apparent negative ETR in the country.
Sao Tome and Principe	EP	-	-	-	-1,178	-	-	-	-	-	-	
Senegal	EP MS	697,581	66,372	763,953	34	5,951	11,757	21,502	13,991	271	94,086	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Senegal, thus resulting in an apparent high ETR in the country.
South Africa	EP GRP MS	3,723,945	128,793	3,852,738	128,874	40,138	39,448	82,265	636,873	928	696,834	
Uganda	EP MS	434,224	8,298	442,522	-6,155	5,321	6,151	3,095	81,482	316	1,109,293	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in Uganda, thus resulting in an apparent negative ETR in the country.

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United Arab Emirates	EP GRP SCC MS	241,190	6,935,624	7,176,814	796,310	-	-	5,446	-	526	2,139,795	Most taxes incurred and paid on our extractive activities in the UAE are classified as production taxes in our financial statements following the IFRS accounting standards guidance. As shown in our Extractive Industries report, the global amount of taxes paid in the UAE in fiscal year 2019 was \$ 5,017 M.
United Kingdom	EP GRP MS RC	12,235,997	5,932,480	18,168,477	1,313,087	343,042	238,010	6,480,632	3,058,866	2,866	3,666,470	
United States	EP GRP RC SCC	16,374,277	15,675,745	32,050,022	-695,640	16,608	12,456	17,641,408	-3,699,513	7,772	6,852,572	The profit before tax reported in the CbCR is equal to the sum of profits and losses of all the reportable entities in the country, computed following the IFRS accounting rules. Such consolidation of profits and losses of all our activities is not possible for tax purposes in the USA since TotalEnergies owns several tax consolidated subgroups in the country. Various book to tax differences trigger additional variations of the country's ETR.
Rest of the world												
		62,908,039	55,483,391	118,391,431	2,661,121	281,174	464,663	1,791,329	8,856,611	17,180	6,912,808	
<b>TOTAL</b>		<b>206,107,186</b>	<b>186,576,103</b>	<b>392,683,289</b>	<b>14,202,699</b>	<b>5,196,808</b>	<b>5,498,166</b>	<b>158,072,887</b>	<b>139,824,122</b>	<b>124,047</b>	<b>117,414,453</b>	

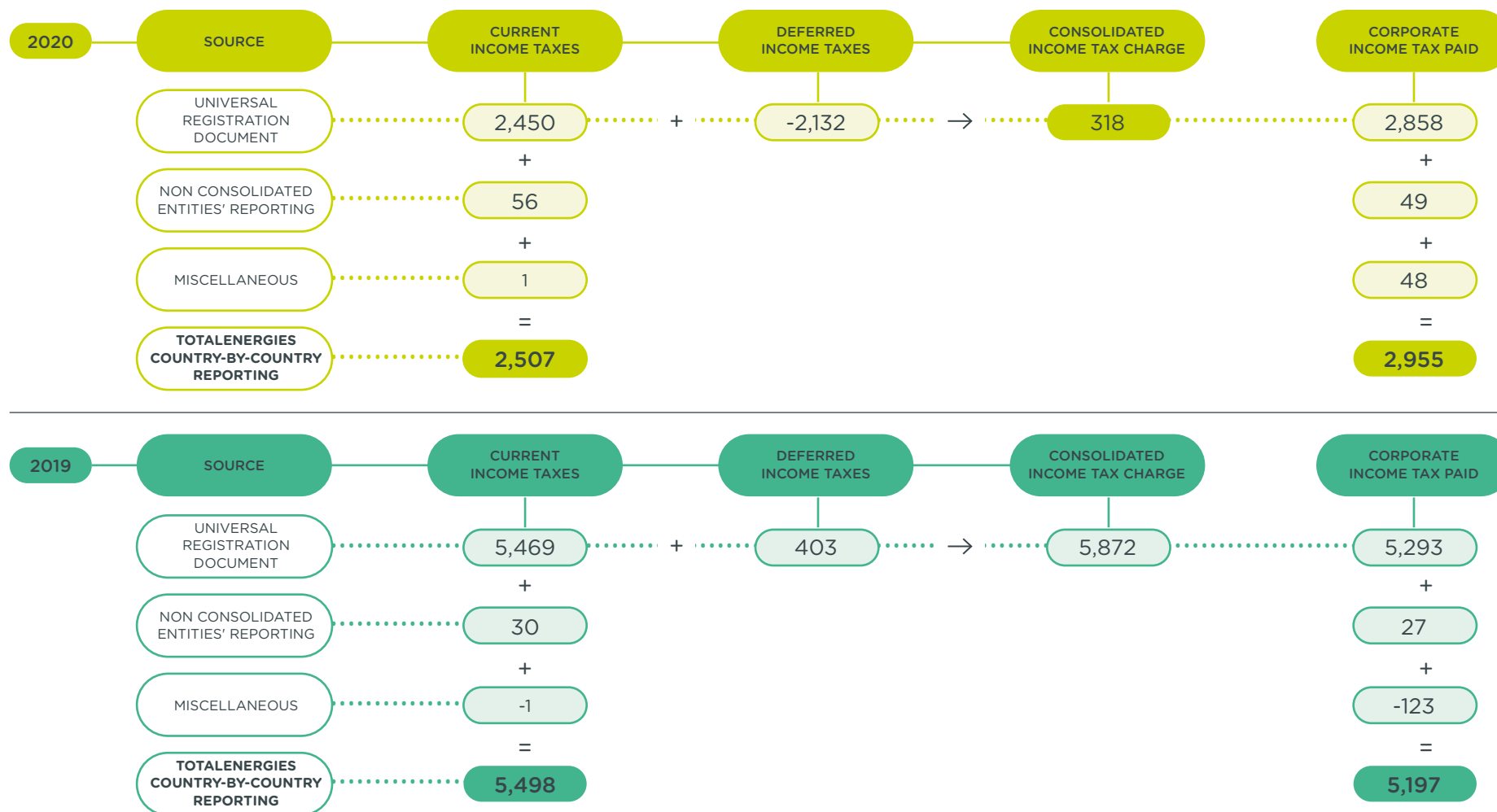
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## Reconciliation of the 2020 and 2019 corporate income tax information between the universal registration document and the country-by-country reporting (in M\$)

In our URD (pages 364 and 337 for 2020), 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.



The data provided in (i) the Total Tax Contribution (taxes paid and collected), (ii) the extractive industries report of payments to governments and (iii) the country-by-country reporting information published in the present report was subject to internal review and third party assurance by our external auditors KPMG S.A. and ERNST & YOUNG Audit in accordance with the International Standard for Assurance Engagements ('ISAE') 3000. The assurance statements can be found on the Company website.



### 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.

### 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.

### Effective Tax Rate (ETR)

Percentage of Corporate Income Tax accrued on the Profit Before Tax (unless otherwise defined).

### Extractive Industries Transparency Initiative (EITI)

The global standard for the good governance of oil, gas and mineral resources.

### 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.

### JV

Joint Venture, a joint arrangement between parties that have joint control of the arrangement.

### OECD

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

### 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

### WEF tax transparency standard

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

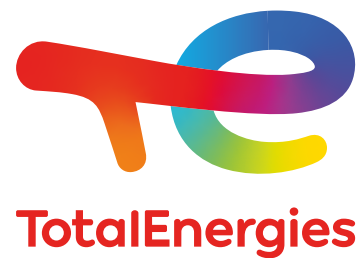
### Withholding tax

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

**UNITS:**     **bn** Billion

**k** Thousand

**M** Million



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