# UNITED STATES SECURITIES AND EXCHANGE COMMISSION Was

## Section 1 - Conflict Minerals Disclosure

## Item 1.01 Conflict Minerals Disclosure and Report

TechnipFMC plc evaluated its product lines and determined that certain products that it manufactures or contracts to manufacture contain tin, tungsten, tantalum, and/or gold necessary to the functionality or production of such product(s).

A copy of this Form SD and the Conflict Minerals Report filed as Exhibit 1.01 hereto are publicly available on TechnipFMC's Internet web site at <a href="https://www.technipfmc.com">www.technipfmc.com</a>.

#### Item 1.02 Exhibit

TechnipFMC's Conflict Minerals Report is filed as Exhibit 1.01 hereto.

Section 2 - Exhibits

Item 2.01 Exhibits

Exhibit No. Description of Exhibit

1.01 Conflict Minerals Report

# **SIGNATURES**

Pursuant to the requirements of the S\$

# **EXHIBIT INDEX**

Exhibit No. Description of Exhibit

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#### TechnipFMC plc

### **Conflict Minerals Report** for the Year Ended December 31, 2019

#### 1. Introduction

This Conflict Minerals Report describes TechnipFMC plc's (the "Company," "TechnipFMC," "we," "us," and "our") due diligence process in accordance with the requirements of Rule 13p-1 of the Securities Exchange Act of 1934, as amended.

#### 2. Company Overview and Applicability of Rule 13p-1

TechnipFMC plc is a public limited company incorporated and organized under the laws of England and Wales, with registered number 09909709, and with registered office at One St. Paul's Churchyard, London EC4M 8AP, United Kingdom.

TechnipFMC is a global energy service company with a portfolio of solutions for the production and transformation of hydrocarbons and renewable energy sources. These solutions range from discreet products and services to fully integrated solutions based on proprietary technologies, with a clear focus to deliver greater efficiency across project lifecycles from concept to delivery and beyond.

We have operational headquarters in Paris, France and Houston, Texas, United States. We operate across three business segments: Subsea, Technip Energies (previously our Onshore/Offshore segment), and Surface Technologies. Through these segments, we are levered to the three energy growth areas of unconventionals, liquefied natural gas, and deepwater developments.

We have a unique and comprehensive set of capabilities to serve the oil and gas industry. With our proprietary technologies and production systems, integration expertise, and comprehensive solutions, we are transforming our clients' project economics. We have evaluated our product lines and determined that certain products that we manufacture or contract to manufacture contain tin, tungsten, tantalum, and/or gold ("3TG") and that such 3TG are necessary to the functionality or production of such product(s). These products include, but are not limited to, subsea production and processing systems, surface wellhead production systems, high pressure fluid control equipment, measurement solutions, marine loading systems, remotely operating valuable system 1904 and umbilical systems, subsea control systems, fracturing flowback services, and umbilical systems for the gle itroe energy industry.

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- We requested that our suppliers respond to our conflict minerals questionnaire, which was based on the Responsible Minerals Initiative's (formerly known as the Conflict-Free Sourcing Initiative) Conflict Minerals Reporting Template 5.0 ("CMRT"), an initiative of the Responsible Business Alliance and Global e-Sustainability Initiative.
  - Suppliers were offered two options to submit the relevant information: uploading the CMRT in Microsoft Excel
    format into the Source Intelligence platform or completing an online version of the conflict minerals questionnaire
    directly within the Source Intelligence platform. In certain cases, if a supplier was unable to complete the relevant
    information on the platform, we or Source Intelligence uploaded the CMRT on their behalf.
  - Suppliers were able to provide responses at the part-specific, product-specific or company level. The majority of our suppliers provided their responses at a company level.
  - Where a supplier did not provide a CMRT, Source Intelligence requested information on its suppliers of products or components that might require 3TG for their production and/or functionality. These Tier 2 suppliers, and subsequent tiers of suppliers, as needed, were then engaged following the contact procedures explained above. When contact information was provided, Tier 2 and beyond suppliers were contacted via email or telephone in order to build a chain-of-custody back to the 3TG SOR. When needed, Source Intelligence executed non-disclosure agreements with our Suppliers to address and meet supplier concerns regarding the confidentiality of their data.

Responding suppliers indicated one or more of the regulated metals (3TG) as necessary to the functionality or production of the products they supply to TechnipFMC. Based on our RCOI inquiry, we believe that certain of our products may contain 3TG that originated in the DRC and were not from recycled or scrap sources. As such, we then proceeded to exercise due diligence on the source and chain of custody of such 3TG.

# 4. Due Diligence

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Metal	Official Smelter Name	Country of Origin	Certified Smelter <sup>1</sup>
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Zambia	YES
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	DRC- Congo (Kinshasa)	YES
Gold	Asaka Riken Co., Ltd.	Burundi	YES
Gold	Asaka Riken Co., Ltd.	Rwanda	YES
Gold	CCR Refinery - Glencore Canada Corporation	DRC- Congo (Kinshasa)	YES
Gold	CCR Refinery - Glencore Canada Corporation	Zambia	YES
Gold	CCR Refinery - Glencore Canada Corporation	DRC- Congo (Kinshasa)	YES
Gold	Jiangxi Copper Co., Ltd.	Rwanda	YES
Gold	Mitsubishi Materials Corporation	Congo (Brazzaville)	YES
Gold	Nihon Material Co., Ltd.	Rwanda	YES
Gold	Nihon Material Co., Ltd.	DRC- Congo (Kinshasa)	YES
Gold	Prioksky Plant of Non-Ferrous Metals	Rwanda	YES
Gold	Rand Refinery (Pty) Ltd.	DRC- Congo (Kinshasa)	YES
Gold	Rand Refinery (Pty) Ltd.	Tanzania	YES
Gold	Samduck Precious Metals	Rwanda	YES
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	DRC- Congo (Kinshasa)	YES
Tantalum	F&X Electro-Materials Ltd.	Angola	YES
Tantalum	F&X Electro-Materials Ltd.	Burundi	YES
Tantalum	F&X Electro-Materials Ltd.	South Sudan	YES
Tantalum	F&X Electro-Materials Ltd.	Rwanda	YES
Tantalum	F&X Electro-Materials Ltd.	Tanzania	YES
Tantalum	F&X Electro-Materials Ltd.	DRC- Congo (Kinshasa)	YES
Tantalum	F&X Electro-Materials Ltd.	Zambia	YES
Tantalum	F&X Electro-Materials Ltd.	Congo (Brazzaville)	YES
Tantalum	F&X Electro-Materials Ltd.	Uganda	YES
Tantalum	F&X Electro-Materials Ltd.	Central African Republic	YES
Tantalum	Global Advanced Metals Aizu	DRC- Congo (Kinshasa)	YES
Tantalum	Global Advanced Metals Aizu	Uganda	YES
Tantalum	Global Advanced Metals Aizu	South Sudan	YES
Tantalum	Global Advanced Metals Aizu	Central African Republic	YES
Tantalum	Global Advanced Metals Aizu	Burundi	YES
Tantalum	Global Advanced Metals Aizu	Rwanda	YES
Tantalum	Global Advanced Metals Aizu	Angola	YES
Tantalum	Global Advanced Metals Aizu	Congo (Brazzaville)	YES
Tantalum	Global Advanced Metals Aizu	Tanzania	YES
Tantalum	Global Advanced Metals Aizu	Zambia	YES

Tantalum	Global Advanced Metals Boyertown	Angola	YES
Tantalum	<b>பேறுக்கும்இக</b> bMetals Boyertown	Rwanda	YES
Tantalum	Global Advanced Metals Boyertown	Zambia	YES
Tantalum	Global Advanced Metals Boyertown	Tanzania	YES
Tantalum	Global Advanced Metals Boyertown	Central African Republic	YES
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Tin	Thaisarco	South Sudan	YES
Tin	Thaisarco	Zambia	YES
Tin	Thaisarco	DRC- Congo (Kinshasa)	YES
Tin	Thaisarco	Rwanda	YES
Tungsten	A.L.M.T. TUNGSTEN Corp.	DRC- Congo (Kinshasa)	YES
Tungsten	A.L.M.T. TUNGSTEN Corp.	Burundi	YES
Tungsten	A.L.M.T. TUNGSTEN Corp.	Rwanda	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Congo (Brazzaville)	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	South Sudan	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Angola	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Tanzania	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Central African Republic	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Zambia	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Rwanda	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Uganda	YES
Tungsten	Asia Tungsten Products Vietnam Ltd.	Burundi	YES
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	DRC- Congo (Kinshasa)	YES
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	Rwanda	YES
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	DRC- Congo (Kinshasa)	YES
Tungsten	H.C. Starck Tungsten GmbH	Rwanda	YES
Tungsten	Hydrometallurg, JSC	DRC- Congo (Kinshasa)	YES
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	DRC- Congo (Kinshasa)	YES
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Rwanda	YES
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Burundi	YES
Tungsten	Xiamen Tungsten Co., Ltd.	DRC- Congo (Kinshasa)	YES
Tungsten	Xiamen Tungsten Co., Ltd.	Rwanda	YES

<sup>&</sup>lt;sup>1</sup> "Certified Smelter" means a smelter who has been validated and/or certified under the Responsible Minerals Assurance Process (RMAP), Responsible Jewellery Council (RJC), or the London Bullion Market Association (LBMA).

# 6. Risk Mitigation for Future Due Diligence

In moving to improve our due diligence and further mitigate the risk of benefiting armed groups, we have taken as of December 31, 2019, or will take, the following steps:

- Continue communicating clear standards with suppliers regarding performance, transparency, and responsible sourcing, including developing a dedicated supplier website;
- Undertake reasonable efforts to increase the response rate of our suppliers in our RCOI process by continuing our corrective action plans for non-responsive suppliers to ensure compliance with our supplier standards;
- Provide assistance and education to suppliers regarding Dodd-Frank Act Section 1502 to cascade compliance protocols to more tiers of our supply chain;
- Continue to compare the RCOI results to information collected via independent conflict-free smelter validation programs and share information with our suppliers and our supply chain organization;
- Engage suppliers who presently source from other suppliers who are using uncertified SORs;
- Engage uncertified SORs directly to communicate industry-based need for certification; and
- Continue to participate in both local and national industry groups to develop best practices regarding responsible sourcing.