

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

1 Issuer's name  TechnipFMC Plc		2 Issuer's employer identification number (EIN)  98-1283037	
3 Name of contact for additional information  Maryann T. Mannen	4 Telephone No. of contact  +281-591-4080	5 Email address of contact	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact  11740 Katy Fwy., Suite 100		7 City, town, or post office, state, and Zip code of contact  Houston, TX 77079	
8 Date of action  01-16-2017		9 Classification and description  Stock; taxable exchange of stock on a one-to-one basis	
10 CUSIP number  G87110 105	11 Serial number(s)	12 Ticker symbol  FTI	13 Account number(s)

**Part II Organizational Action** Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On January 16, 2017, at 5:59pm EDT, TechnipFMC US Merger Sub LLC ("Merger Sub") merged into FMC Technologies, Inc. ("FMCTI"), with FMCTI being the survivor (the "FMCTI Merger"). As a result of the FMCTI Merger, each outstanding common share of FMCTI stock was exchanged for one ordinary share of TechnipFMC Plc ("PLC") stock in a transaction that generally should be treated as a taxable exchange for U.S. federal tax purposes. However, for those former shareholders of FMCTI whose percentage ownership in the shares of PLC subsequent to the FMCTI Merger were equal to or higher than their respective percentage ownership in the shares of FMCTI prior to the merger, the PLC shares received in the FMCTI Merger could be treated as a Section 301 distribution pursuant to the rules of Sections 304 and 302(d) of the Code. Shareholders are encouraged to consult their own tax advisors with respect to the application of Section 304 in light of their particular circumstances.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ For those former FMCTI shareholders for whom the FMCTI Merger was a taxable exchange, their tax basis in the PLC ordinary shares received should be equal to the fair market value of those shares upon receipt on January 17, 2017. For those former FMCTI shareholders for whom the FMCTI Merger was treated as a Section 301 distribution, their tax basis in the PLC ordinary shares received as a Section 301 should be equal to the fair market value of those shares upon receipt on January 17, 2017; in addition, such former shareholders of FMCTI should add to the tax basis of all of their PLC shares a pro rata portion of the unrecovered basis (if any) of their FMCTI shares subsequent to the Section 301 distribution pursuant to the rules of Sections 304 and 302(d) of the Code. Shareholders are encouraged to consult their own tax advisors with respect to the application of Section 304 in light of their particular circumstances.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ The fair market value per ordinary share of PLC on January 17, 2017 was US\$35.53, calculated as the average trading price for such shares on that date.

**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 301(c) and (d), 302(a) and (d), 304(a)(1), 1001 and 1012(a).

18 Can any resulting loss be recognized? ▶ For those former FMCTI shareholders for whom the FMCTI Merger was a taxable exchange, they should be permitted to recognize any loss realized on the exchange, subject to the normal limitations on the recognition of losses under the Code. For those former FMCTI shareholders for whom the FMCTI Merger was treated as a Section 301 distribution, no losses would be recognized; instead, such losses should be reflected in the their tax bases in the PLC ordinary shares held subsequent to the FMCTI Merger.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year for the FMCTI Merger should be the 2017 tax year.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶ *Maryann T. Mann* Date ▶ 1-31-2017

Print your name ▶ Maryann T. Mann Title ▶ EVP and Chief Financial Officer

**Paid Preparer Use Only**

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	