

CODE OF ETHICAL CONDUCT

the way we work



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PERSONAL MESSAGE FROM OUR CEO

“Use your **good judgment**.
If in doubt, ask for advice.”

Dear Colleagues,

I am pleased to present you with the latest version of **Tullow's Code of Ethical Conduct**.

The Code describes both our Values and the positive behaviour we expect across our business, as well as providing you with guidance on managing the ethical and compliance issues you may face whilst carrying out your day-to-day work. Please take the time to read the Code carefully and take on board the helpful advice it provides.

We have earned a reputation as Africa's leading independent oil company, which is arguably one of our most important assets. This hasn't been achieved by chance, but is thanks to our hard work, our zero tolerance of bribery and corruption, our high health, safety and environmental standards and our strong relationships with host governments. This reputation has been built over the course of many years through the integrity, respect, transparency and honesty you bring to your roles and how you represent Tullow. However, it only takes one instance of unethical behaviour to damage this positive reputation.

If you have any concerns or are aware of any violation of this Code, I strongly encourage you to speak up. Please report any concerns regarding misconduct to your line manager or the Ethics & Compliance team, or confidentially through our independent reporting line – Safecall. Anyone raising concerns in good faith can do so without fear of negative consequences and you have the support of senior management, including the Board of Directors, to speak up.

Thank you for your continued hard work, loyal support and commitment to making Tullow the great place it is to work and securing the respected position it holds in the industry.

A handwritten signature in dark ink, appearing to read 'P. McDade'. The signature is fluid and cursive, with a large 'P' and 'M'.

Paul McDade, Chief Executive Officer

September 2018

TULLOW VALUES

Our company Values are a vital part of our culture and should guide us on how to execute the business.



Our culture, like our reputation, is made up of every single action and deed from every person in Tullow. Therefore, your contribution to upholding our Values is important and we should all be active ambassadors on them, both inside and outside the company.

VALUE

Focus on value creation through performance, delivery and accountability

In Tullow we:

- Set goals and manage performance to deliver against them;
- Align our individual objectives with those of the business;
- Take accountability for our actions;
- Deliver our objectives and learn from our experiences.

INTEGRITY

Act with integrity and have respect for each other, communities and places where we work

In Tullow we:

- Treat our people and our stakeholders with respect at all times;
- Operate safely, responsibly and sustainably;
- Are transparent in our activities and reporting;
- Adhere to our Code of Ethical Conduct and our Standards.

COLLABORATION

Work collaboratively to leverage our collective talents and support the development of each other

In Tullow we:

- Share ideas, insights and knowledge;
- Develop our personal skills and competence;
- Build and maintain positive working relationships;
- Acknowledge and celebrate success.

INITIATIVE

Take initiative to find new and innovative ways to develop the business

In Tullow we:

- Take on new challenges and think creatively;
- Manage risk and find innovative solutions to difficult problems;
- Constructively challenge ourselves and decisions;
- Seek ways to find and share best practice and work with other industry companies.

USE OF THE CODE AND OUR RESPONSIBILITIES

We commit to ensuring our staff understand and apply our Code. We foster a culture of ethics and compliance and we commit to doing the right thing.

✓ YOU MUST:

- ✓ Ensure that you read and understand how to apply the Code in your work environment.

✗ YOU MUST NOT:

- ✗ Ignore requirements set out in Company policies, standards, procedures and guidelines.




FOR MORE INFORMATION:

Refer to the documents highlighted throughout the Code.

How to use this Code

The Code of Ethical Conduct ("Code") is owned, driven and supported by the Board of Directors of Tullow Oil plc. It clearly sets out the expectations of all those who work for us and you must ensure that you read and understand how to apply the Code in your work environment. The Code does not reference all the policies, standards, procedures or guidelines in place across the Group and so you must also ensure that you familiarise yourself with those that apply to you.

The Code summarises **dos and don'ts**, denoted by a ✓ and ✗, to highlight certain key requirements in each section. These may not be the only mandatory requirements and you must ensure that you read other associated documents, some of which are referenced in this Code, to understand what is expected of you.

The **resource tool icon**  is marked throughout the Code to highlight certain Group documents which are relevant to the subject areas covered within the Code.

Who does the Code apply to?

The Code applies to the Board of Directors, senior management and all other Tullow employees and contract, agency or temporary workers (hereafter collectively referred to as "staff"). Compliance with this Code is mandatory for all staff.

We expect our joint venture partners, suppliers, agents, advisors, consultants or other entities (collectively referred to as "business partners") to act in a manner that is consistent with the spirit of this Code when engaged in activity linked to Tullow. Unless required under a contract,

we do not expect our business partners to implement policies, standards and procedures referred to in this Code; however, we encourage them to develop and adopt controls contributing to a culture of ethics and compliance.

In joint ventures where Tullow is in control or is the operator, then this Code applies to all of the activities of the joint venture. Where Tullow does not have control, then best efforts are to be taken to influence the adoption of equivalent practices and high standards of integrity prior to, and during, the operation of the joint venture.

How does the Code fit into the Tullow Integrated Management System (IMS)?

The Code, like other IMS standards, sets high-level mandatory expectations of all staff, driven by our Values and Principles. It is complemented by several of our policies and references specific standards and procedures within the IMS which provide staff with more details on what is expected of them.

Personal responsibility

As a staff member, you have a personal responsibility to comply with the requirements set out in this Code. Please read it carefully, apply it in your work and ensure that you always act within the limits of your authority. Where you are in any doubt, or are unsure of the action to take, always seek advice.

You must actively promote compliance with the Code with all those who work directly for or on behalf of Tullow.

Responsibility of managers

Managers or anybody with direct reports have an additional responsibility to support and promote compliance with the Code and related policies, standards and procedures.

You must ensure that:

- ✓ You demonstrate your commitment to the Code through your leadership, personal behaviour and actions;
- ✓ All of your direct reports receive an adequate induction to Tullow;
- ✓ All of your direct reports have a copy of the Code and understand how to apply it;
- ✓ You support staff who ask questions or raise concerns;

I am impressed that my manager takes compliance with the Code so seriously and shows real leadership.

- ✓ You supervise your staff, monitor your business activities and ensure compliance with the Code;
- ✓ All reports of breaches of the Code are appropriately reported and investigated.

Within your area of responsibility, **you must** ensure that:

- ✓ You adequately assess, mitigate and address business risks and any deficiencies identified that would lead to this Code being compromised;
- ✓ An effective system of internal control has been implemented and your business processes are consistent with the Code.

Advice and guidance

Where you are unclear on any aspect of the Code or you are unsure of the right action to take in a situation, then always seek help. Advice can be obtained from many different sources including your line or functional manager, Ethics & Compliance team, HR representative, legal advisor or a member of senior or executive management.



KEY MESSAGE:

If in doubt, ask for advice.

Breaches of the Code and investigations

Failure to comply with any aspect of the Code or related policies, standards or procedures may lead to disciplinary action up to and including dismissal and, in the case of contract staff or business partners, termination of contract.

Where there is suspicion of, or an actual breach of the Code, an internal investigation may be initiated. Internal investigations are carried out by personnel in accordance with the principles set out in the **Investigation Guidelines**.

The Company will fully cooperate with law enforcement or regulators if required. Staff are expected to cooperate fully in any internal or external investigation if requested to do so. Interference, obstruction or failure to cooperate in an investigation will be regarded as misconduct and subject to a disciplinary process or, in the case of staff who are not direct employees, appropriate sanctions.



SAFE AND SUSTAINABLE OPERATIONS

*We are committed to safe
and sustainable operations.*

I must act to
stop someone
getting hurt.



Tullow is committed to safe and sustainable operations as set out in our **Safe and Sustainable Operations Policy**. The standards and processes within the Tullow Integrated Management System (IMS) set out how we protect the environment for current and future generations as well as ensure that our local communities, employees, contract staff and business partners are kept safe and well.

We expect everyone to think about their role in managing the Environment, Health and Safety (EHS) risks that exist in our business and in particular, within their own area of responsibility and influence.



Environment

We work with respect for the environment in which we operate and we identify, assess and manage our environmental impacts. We assess the potential for our activities to impact sensitive areas prior to undertaking any activity.

✓ YOU MUST:

- ✓ Comply with the requirements of our environmental, health and safety standards and assist those working with you to do the same;
- ✓ Ensure you identify, assess and take steps to control EHS hazards associated with your work;
- ✓ Use the protective equipment required for the task you are undertaking;
- ✓ Make sure you know what to do if an emergency occurs at your workplace and that visitors are familiar with emergency procedures;
- ✓ Report to your manager any actual or potential accident, injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment so that appropriate action can be taken to prevent, correct or control those conditions;
- ✓ Immediately stop any work that appears to be unsafe.

✗ YOU MUST NOT:

- ✗ Undertake work unless you are trained, competent and medically fit to do so;
- ✗ Undertake work when your performance is impaired by alcohol or other drugs, legal or illegal, prescribed or otherwise.

? QUESTION:

"I have noticed some unsafe working practices a few times and, although I reported them to my manager, nothing seems to have changed – I am quite worried that someone will get hurt. What should I do?"

i ANSWER:

'You are doing the right thing in reporting a concern and it is really important that you do not give up on the issue. You should talk to your manager again and ask what action is going to be taken or you should escalate the issue to another manager or to your safety representative. If you prefer, you can use the external, confidential reporting line – Safecall, which is described within this Code.'

Health and safety

Our priority is to ensure that all our people, regardless of where they work or what they do, return home safe and well at the end of every working day.

We are committed to achieving high standards of health and safety performance and working to prevent all accidents, occupational illnesses and injuries.

□ KEY MESSAGE:

STOP any work that appears to be unsafe.



OUR PEOPLE

We are committed to creating and maintaining an open work environment that is enjoyable, rewarding, free from discrimination and where everyone is treated fairly in line with our Company Values.

Our different experiences and backgrounds, together with our willingness to help each other, really contribute to the success of our team.



Our people

Everyone who works for or on behalf of Tullow is valued for their different skills, abilities, creativity and the differing backgrounds and experience that they bring to our business. All our people contribute to our success and in maintaining our good reputation.

Equal opportunities

We aim to create an inclusive environment, free from discrimination, where individual differences and the contributions of all our staff are recognised and everybody is treated fairly. We have zero tolerance for any form of discrimination and decisions related to recruitment selection, development or promotion are based upon aptitude and ability only. Decisions must not be influenced by factors such as age, gender, sexual orientation, marital status, race, colour, ethnic origin, religion or belief, disability or political views.

Workplace conduct

We are committed to fostering a supportive working environment where each individual is respected and where concerns can be raised openly without fear of retaliation.

We do not tolerate abuse, violence, bullying or harassment in any form whether directed at staff, business partners or anyone else. Such behaviour can result in an individual feeling intimidated, degraded, humiliated or offended.



KEY MESSAGE:

Be aware of your own behaviour and how it can affect others positively or negatively.

? QUESTION:

"I have seen someone shouting at a member of staff and often saying inappropriate things about them. What should I do?"

i ANSWER:

'You could talk to the person and tell them that their behaviour is unacceptable or you could raise it with your manager or an HR representative. If you are uncomfortable with these options, then you can call Safecall – the external, independent and confidential reporting line.'



FOR MORE INFORMATION:

Refer to the **Employee Handbook** or other documents that apply to your location or contact your **HR representative**.

✗ YOU MUST NOT:

- ✗ Behave in any way that could be viewed as offensive, intimidating, malicious or insulting;
- ✗ Create or support a hostile or intimidating work environment including one in which staff may feel forced to engage in inappropriate work practices in order to be accepted;
- ✗ Humiliate, denigrate or injure another person;
- ✗ Make racial, ethnic, religious, age-related or sexual jokes or insults;
- ✗ Make inappropriate comments of a sexual nature or engage in sexual harassment or any other offensive behaviour;
- ✗ Distribute or display offensive material including inappropriate images;
- ✗ Retaliate against anyone who has raised an issue or concern in good faith.

Privacy of personal information

We maintain the confidentiality of all personal information. Access to personal information is restricted to Tullow staff who are authorised and who have a legitimate business need for that information. Some countries have data protection laws that restrict the transfer of personal information outside the country of origin. All staff who are responsible for the maintenance and use of staff personal information must ensure that they are aware of and comply with all relevant personal data protection laws and take appropriate steps to adequately protect the information. For more guidance on the lawful processing of personal data, please refer to the **Data Privacy Standard** and the **GDPR Privacy notice for Employees, Workers and Contractors**.





PERSONAL AND BUSINESS INTEGRITY

*Our collective behaviour defines us as
a company and we commit to act
with integrity at all times.*



Compliance with the law

We comply with all applicable local and international laws within the countries where we do business. Where differences exist between the standard of the law or regulations and the requirements of the Code, the higher standard will be applied. Where laws conflict or you are unsure of the correct action to take, you must consult your legal advisor. Managers with responsibility for business activities within a country must ensure that our business processes are in compliance with the law.

Anti-bribery and corruption

Tullow has zero tolerance of any form of corruption.

We conduct our business honestly, fairly and transparently and we do not exercise improper influence on any individual or entity. We are subject to many anti-bribery laws in the jurisdictions within which we work and, as a UK registered company, are required to comply with the UK Bribery Act (2010).

Our anti-bribery and corruption programme is structured around the principles contained in the UK Ministry of Justice's guidance on 'adequate procedures to prevent bribery'.

We do not offer, promise or give, nor do we request, agree to receive or accept, any bribe of any description or value to reward the improper performance of someone's duties or for any other purpose. This applies to anyone who works for, or provides services to, Tullow.

Bribes are usually associated with money but equally can be found in other forms such as the offer of a job for an individual or family member, travel, accommodation, use of assets or preferential terms on a product, service or loan.

Trust and reputation are built through a consistent demonstration of integrity and fairness.

Small bribes (facilitation payments)

Historically, small bribes to Public Officials have been called facilitation payments. Such payments are generally low value and made to a Public Official with the intention of speeding up a routine, non-discretionary action to which the person is already entitled.



Examples include speeding up the issue of a visa, enabling goods to clear customs, obtaining a permit or jumping a queue. Under UK and many other laws, such payments are illegal and carry potentially high penalties.

Tullow does not permit facilitation payments to be paid either directly or indirectly by those who work for us or on our behalf, regardless of the jurisdiction in which we operate. If you are asked to make such a payment, then you must politely refuse and report it to your line manager and your local or Group Ethics & Compliance team as soon as practicable.

Duress and extortion

If you are ever in an exceptional situation where demands are being made for a small bribe or facilitation payment and you genuinely consider that your health, safety or security will be threatened if a payment is not made, then you can pay the minimum amount possible to remove yourself from the situation. However, **you must** immediately report the facts to your manager and your local or Group Ethics & Compliance team so that appropriate action can be considered.



KEY MESSAGE:

Report any request for a facilitation payment to your line manager and local or Group Ethics & Compliance team as soon as you can.

We will support anyone working for, or on behalf of, Tullow who refuses to pay a bribe.

? QUESTION:

"One of our suppliers has raised a concern about work permit application delays for their staff working on our project and they feel under a lot of pressure to pay small bribes to speed up the process. What should I do?"

i ANSWER:

'You should immediately raise this with your line manager and your Ethics & Compliance team in confidence so the appropriate action can be taken. You should thank the supplier for raising the issue and remind them that we do not permit such payments to be made.'



FOR MORE INFORMATION:

Refer to the **Guidelines on Resisting Facilitation Payments**.

Public Officials

There are specific legal risks connected with providing, or being perceived to provide, a financial or other advantage to a Public Official.

The definition of a Public Official is broad but includes:

- Any director, employee, officer, consultant, agent or representative of a government department, agency or ministry (e.g. immigration, customs, permitting, finance, tax, energy etc.);
- Employees and board members of state owned companies or enterprises (e.g. national oil companies);
- Any judge, official or other person carrying out duties within the judicial system;
- Any member of the police or military;
- A member, officer, employee or representative of the legislature (both local and central government);
- Any political party or party official or any candidate for political office;
- Any official or agent of a public international organisation (e.g. organisations with membership of sovereign states, such as the World Bank Group, United Nations, European Union).

Politically Exposed Person (“PEP”)

A PEP is someone who has previously been entrusted with prominent public functions in government or a public international organisation (such as the United Nations or World Bank Group). A PEP includes former heads of state; senior politicians; senior government, judicial or military officials; senior executives of state owned corporations; important political party officials; or senior members of public international organisations or their boards. It is also someone who is closely connected to a PEP, such as a family member or business associate.

Where a transaction involves a PEP, e.g. someone who is providing consultancy services to the company, or who is a shareholder of a supplier company, this generally presents a higher compliance risk by virtue of an influential position that they may hold. Engaging with a PEP is not prohibited, however, enhanced due diligence should be performed – contact your Ethics & Compliance team for advice.

Expenditure on Public Officials

During the course of our work, Tullow interacts with various Public Officials. There will be occasions where we will legitimately incur costs for a Public Official in relation to an event or activity linked to our business. This may occur, for example, where Tullow is required to make the expenditure as stipulated by law or by contract (such as a Production Sharing Agreement or Joint Operating Agreement), where the hosting of a Public Official requires the provision of travel/transport and accommodation or where Tullow may be required to incur expenditure related to the provision of training courses or for a Public Official to attend a conference.

As part of our compliance with the UK Bribery Act and other anti-corruption laws that apply to our business, Tullow is required to demonstrate a high degree of transparency and control when processing expenditure related to a Public Official. The **Expenditure Related to a Public Official Standard** (also called the 'ExPO Standard'), which sets out the process for obtaining management and/or Ethics & Compliance approval and for transparently recording all expenditure via the online ExPO Register, must be applied and complied with for all such transactions.

Political contributions and activities

Tullow does not make any political contributions (whether related to money, assets, materials or services) to political candidates, parties, committees or their representatives. We do not participate in any way in the political processes of host countries. You may choose to become personally involved in political activities as long as you undertake these on your own behalf, in your own time and without using any Tullow resources or involving Tullow in any way.

? QUESTION:

"We've been approached for financial support by a charity, but I am concerned that the patron of the charity is a senior political figure who is currently running for President. Are we able to make a donation or maybe provide some branded material such as hats, pens and diaries?"

i ANSWER:

'We may be able to support the charity if their area of work matches our objectives and strategy. However, we must not provide any cash or non-cash support for the benefit of the politician or their election campaign. You should contact your Government & Public Affairs and your Ethics & Compliance teams for advice.'

✓ YOU MUST:

- ✓ Ensure that all gifts and hospitality are reasonable, transparent and for a genuine business purpose;
- ✓ Obtain the appropriate management approval for the offering or receiving of a gift or hospitality.

✗ YOU MUST NOT:

- ✗ Solicit gifts or hospitality from an individual or an organisation;
- ✗ Offer, give or receive cash or cash equivalent (e.g. gift vouchers or loans);
- ✗ Exchange gifts or hospitality while engaged in a tender process, business negotiation or litigation.

? QUESTION:

"I have been invited to a corporate day at an international sporting event. I think it is very expensive and I don't feel very comfortable about it. Should I accept?"

i ANSWER:

'If you are in any doubt, then discuss it with your line manager or your Ethics & Compliance team. Remember, if you don't feel comfortable, then you probably already know that you should not accept the invitation.'

Gifts and hospitality

Genuine hospitality and promotional or other business expenditure which seeks to improve Tullow's image, to better present its capability and services or establish cordial relations, are recognised as an established and important part of doing business.

Reasonable and proportionate hospitality intended for these purposes is not prohibited. However, inappropriate, frequent or lavish gifts or hospitality can result in an actual or perceived conflict of interest or the development of an obligation on the part of the recipient or could be considered as bribery.

Particular care must be taken when offering or giving gifts or hospitality to a Public Official; in such cases, the **Expenditure Related to a Public Official Standard** must be applied.

Exercising poor judgment with respect to offering, giving or accepting gifts and hospitality could result in a breach of the law with serious consequences for individuals and the Company.

□ KEY MESSAGE:

Remember to read and apply the **Gifts and Hospitality Standard** or the **Expenditure Related to a Public Official Standard** as appropriate.

Immediately record any gift or hospitality in the online **Gifts and Hospitality Register**.





Fraud

Fraud is an intentional act committed by someone in one of three ways:

- Through a dishonest false representation;
- Through failure to disclose information that one has a duty to disclose;
- Through abuse of position.

Fraud represents a fundamental breach of our ethical standards and is not tolerated by Tullow in any form. We are committed to assessing fraud risk and implementing an adequate system of internal control to prevent and detect fraud. All group functions, business units and projects should assess their fraud risks and respective controls in line with the **Risk Management Standard** and any fraud risk management framework set by Group Ethics & Compliance.



KEY MESSAGE:

If you have any reason to suspect that fraud is taking place, you should report this immediately to your line manager and local or Group Ethics & Compliance team or via Safecall.

? QUESTION:

"A former Tullow colleague has just started a small business and wants me to do her monthly financial accounts in return for a small share of the company. What do I need to do?"

i ANSWER:

'Being part of another company, whether as a shareholder, director or when providing support, could give rise to a conflict of interest. In this case, there is a risk that Tullow time may be used for the benefit of another organisation. You will need to make a disclosure using the online conflicts of interest form. Your line manager will discuss this with you and assess whether any support you provide to the company will impact on your work commitments with Tullow. You will also need to provide disclosures if the company intends to do business with Tullow.'

**FOR MORE INFORMATION:**

Refer to the **Guidelines on Conflicts of Interest**.

Conflicts of interest

Tullow respects the privacy of employees in their personal affairs and activities. However, when personal, social, financial or political activities could influence, or appear to influence, the ability to make objective business decisions for Tullow, a conflict of interest can occur.



There are many different ways in which a conflict of interest can arise and these include:

- Conducting Tullow business with a family member or an organisation with which a family member is connected;
- Supervising a family member or someone with whom you have a close personal relationship, where you are in a position to influence their recruitment, salary, performance rating, promotion or other terms of employment;
- Having a close personal or business relationship with a Public Official who is in a position of authority or influence in connection with Tullow business;
- Serving as a director or board member of another organisation which is a competitor or supplier to Tullow;
- Investments in any company that does business or competes with Tullow;
- Second jobs or affiliations with competitors, suppliers or other business partners.

If you have a potential or actual conflict of interest, then you must declare this to your line manager using the online conflicts of interest form found on the intranet. Further guidance on identifying and managing conflicts of interest is available in the **Guidelines on Conflicts of Interest**.

Insider dealing

If an individual, either directly or through one or more intermediaries (e.g. brokers, agents, banks etc.) deals in shares of a company while in possession of inside information relating to that company, then this is termed as **insider dealing** which is illegal.

“Inside information” is principally information which:

- Has not been made public;
- Is specific and precise;
- If it were made public, would be likely to have a significant effect on the price of the company’s shares or its assets.



Although it is most likely that you will, at certain times, have inside information in relation to Tullow, you may also from time to time possess inside information in relation to other companies (e.g. Tullow’s business partners or contractors) which will then similarly restrict your ability to trade in their shares.

It is important that you fully understand the restrictions on dealing in Tullow shares to ensure that you do not breach this Code and potentially, the law.

? QUESTION:

“I have some inside knowledge of company results which may affect the share price. I know I can’t deal in Tullow shares but can I tell a family friend?”

i ANSWER:

‘No, this is illegal. If you were to do this, then you would breach the Code and the law and would risk prosecution and losing your job.’



FOR MORE INFORMATION:

Refer to the
Share Dealing Code.

Competition/anti-trust law

Tullow competes fairly and honestly and we only acquire information about our competitors by legal and ethical means.

Competition laws, known as anti-trust laws in some countries, regulate anti-competitive conduct and prohibit agreements or practices that restrict free trade or competition. Examples include price-fixing, market sharing, limiting production or capacity or abuse by monopolising a market. Penalties for a breach of the law are severe for individuals and companies.



We cooperate with, and contribute to, the development of our industry by participating in relevant industry associations and during the normal course of business, you may have contact with competitors in a wide variety of circumstances, including transactions involving oil and gas trading, trade associations, seminars, conferences, benchmarking and forming joint ventures. You must be particularly careful when attending meetings with competitors to ensure that you do not discuss prohibited topics.

If your work involves dealings and meetings with competitors, you must ensure that you are fully briefed on the implications of competition law. If you are in any doubt about how these laws apply to your work for Tullow, you should obtain advice from your legal advisor.



FOR MORE INFORMATION:

Contact your **Ethics & Compliance** team.

Export controls, sanctions and trade restrictions

Some countries impose restrictions on exports and other business dealings with other countries, entities and individuals. The laws and regulations governing these restrictions are complex and subject to change.

Designated individuals and entities are constantly updated on international sanctions and watch lists, such as those compiled by the United Kingdom, the European Union, the United Nations, the United States of America, or the World Bank Group. As a result, we perform due diligence when engaging with third parties and periodically check whether our business partners are on international sanctions and watch lists as part of our compliance with sanctions and trade restrictions.

If you are responsible for the export or re-export of any items, (including equipment, materials, software or services), you must be aware of these restrictions and ensure that they are complied with. You must also ensure that the correct level of due diligence screening on a third party is performed prior to contract award.



Preventing the facilitation of tax evasion

Tax evasion is the deliberate, fraudulent evasion or cheating of the public revenue of tax that is lawfully due, and is a criminal offence. Tullow has a zero tolerance for tax evasion and the facilitation of tax evasion.

We require individuals and organisations acting on our behalf to not engage in the facilitation of tax evasion. We comply with the UK Criminal Finances Act 2017 which makes companies criminally liable if associated persons (broadly employees, suppliers, contractors, sub-contractors, agents and intermediaries) engage in the facilitation of tax evasion by a third party whilst performing services for that company.

We implement controls to identify and prevent tax evasion and maintain procedures to safeguard against risk from our associated persons who facilitate tax evasion knowingly. If you are concerned that you may have identified tax evasion within Tullow or the facilitation of tax evasion by an associated person, please report this to your Ethics & Compliance team directly, or via Safecall.



BUSINESS PARTNERS

*We commit to fair and transparent
supply chain processes, supporting
and developing suppliers locally
wherever feasible.*

Business partners

Our business requires that we work with a variety of business partners including joint venture partners, local and international suppliers, agents, advisors, consultants and other entities. We endeavour to choose business partners who have equivalent anti-bribery and ethical standards and apply them to their own activities and contractual relationships.

We require that all contracts with business partners contain appropriate anti-bribery clauses that cover, amongst other requirements, compliance with the applicable laws, prohibition of bribery and acting in an ethical manner whilst performing services for us. If you are responsible for managing contracts with suppliers (as a 'Contract Holder'), you should monitor the supplier's performance to provide assurance that they are adhering to contractual requirements.

Local Content

We have a commitment to use local suppliers wherever possible in our business activities and, in many of the countries in which we operate, we have a legal obligation to demonstrate this. When tendering for work with us, we expect our suppliers to demonstrate, via their proposals, how they will fulfil our Local Content requirements. Local Content advisors are available to advise on specific expectations for Local Content.

Our approach to Local Content ensures that our business optimises opportunities for local suppliers at every stage of the supply chain.



Fair and equitable treatment

You must always be able to demonstrate fairness and transparency in our dealings with potential business partners. Where such a partner is a local or international supplier, then you must follow the mandatory **Group Contracts and Procurement Procedure**.

You must not put yourself in a position where you apply undue influence to a contract award or interfere in any way with the tendering process. If you are involved in a tendering process, you must declare any actual or potential conflict of interest as described in the relevant section of this Code.

Due diligence

Due diligence is an important process that allows us to understand the background, capability and potential risks and liabilities associated with a business partner prior to any contractual agreement being put in place. We apply risk-based due diligence to all business partners which includes consideration of risks related to bribery and corruption, sanctions and trade restrictions, and human rights and labour conditions. The level and complexity of the due diligence varies according to the perceived risk. As a minimum, the due diligence will require a due diligence questionnaire to be completed. In the case of higher perceived risks, the due diligence may, for example, extend to the commissioning of an independent, external assessment.

If you are responsible for selecting a supplier, you must comply with the **Group Supplier Due Diligence Procedure**. This sets out the responsibilities of individuals in the due diligence process, the procedure to be followed and the recording requirements.

During the supplier selection process, Supply Chain Management, with support from your local or Group Ethics & Compliance team where needed, will conduct the due diligence and:

- Determine the risk exposure of the service we seek to procure;
- Issue a due diligence questionnaire to the prospective supplier;
- Review the responses to our questionnaire and determine whether they meet Tullow's compliance requirements.

? QUESTION:

"We are setting up a contract with a supplier but don't feel we should apply the anti-corruption due diligence procedure as they may not know how to respond to the due diligence questionnaire. Is this ok?"

i ANSWER:

'No, the use of this procedure is mandatory but remember that it is risk-based and the depth of due diligence required is linked to the contract value and the risk of the service to be provided. The process can also be used as an opportunity to raise standards with suppliers and inform them of our requirements but we will still need appropriate, documented due diligence to protect Tullow's interests.'

? QUESTION:

"I am a contract holder and manage the relationship with a supplier. Just recently I have heard rumours that they have been making some payments to customs officers to speed up the import of our materials. I don't have any proof and I am not sure what to do?"

i ANSWER:

'Even though it is only a suspicion, you should not ignore it because such payments could have significant legal implications for individuals and for Tullow. You should raise this with your line manager and engage with your local or Group Ethics & Compliance team to discuss the appropriate way forward.'

Monitoring of business partners

We endeavour to monitor the activities and performance of our business partners in line with the assessed risk and use internal audit and external resources as appropriate. Monitoring includes ensuring that the contract terms are adhered to, the law is complied with and our ethical standards are maintained.

Where activity is perceived as higher risk, we exercise greater oversight. Higher risk activities may include those which involve an interface with Public Officials or take place in a country or business area where bribery or corruption is known to be prevalent.

If you manage a contract or relationship (as a 'Contract Holder'), **you must:**

- Proactively monitor performance and delivery of, and compliance with, the contractual terms;
- Document and follow up on any performance issues or deviations from the contract;
- Ensure that any agreed remedial actions or improvements are implemented within the agreed timescale;
- Encourage business partners to raise any ethical challenges or concerns and ensure that they are fully supported in resolving these;
- Periodically remind business partners of their obligations;
- Immediately report any activity or behaviour that breaches the law or our Code.

We will take appropriate action where we consider a business partner has not met our expectations or contractual obligations.

KEY MESSAGE:

Our business partners are a key part of maintaining our good reputation and we must ensure that we work closely with them, monitor their performance and support them where necessary.

A background image showing two men in a community setting. On the left, a man in a light-colored patterned shirt is seen in profile, looking towards the right. On the right, a man with a beard and a light-colored shirt is smiling and looking towards the first man. In the background, there is a sign with the word 'ALLOW' and a stylized logo. The entire image has a dark teal overlay.

HOST COMMUNITIES AND STAKEHOLDERS

We are committed to creating shared prosperity by nurturing long-term relationships with host governments, communities and key stakeholders.

We respect host communities – our goal is to manage our activities in a responsible way to make a positive, tangible and sustainable contribution to economic and social development in the communities and countries in which we operate.

✓ YOU MUST:

- ✓ Report any actual or suspected breaches of Tullow's **Human Rights Policy** by any individual or business partner working for or on behalf of Tullow;
- ✓ Check that risk-based human rights controls have been embedded in the selection of all suppliers if you are responsible for managing a contract or relationship with a supplier.

✗ YOU MUST NOT:

- ✗ Engage in situations that could be interpreted as tolerating or being complicit in human rights abuses.

Human rights

Tullow respects and promotes internationally recognised human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's declaration on Fundamental Principles and Rights at Work. We endeavour to lead by example, always demonstrating our values of integrity and respect. When considering new investments, we review associated potential human rights issues and their relationship to our operations.

As a participant in the Voluntary Principles on Security and Human Rights initiative, Tullow is committed to maintaining the safety and security of its operations in a way that ensures respect for human rights and fundamental freedoms.

Tullow prohibits the use of underage, forced or bonded labour. Tullow respects fundamental labour rights and international labour standards, including those guaranteeing decent wages, regulated working hours and freedom from harassment.

**Anti-Slavery**

We recognise that the nature and context of our business and supply chain exposes Tullow to the potential risk of instances of modern slavery and human trafficking. We work to regularly assess the extent of this risk to our business; and have taken steps to ensure that underage, forced or bonded labour have no place in Tullow's business or supply chain, including increased supplier due diligence and training for our staff. Our annual Modern Slavery Statement, published on the Tullow website, provides an ongoing assessment of identified risks and our efforts to address these.

Communities

We engage with communities early in the planning process to identify the key impacts, both positive and negative, of our operations. We maintain ongoing dialogue to provide information about Tullow's activities and create opportunities for people to contribute to decisions which affect them. We always listen to feedback and concerns, answer enquiries and register grievances made by community members.

Shared Prosperity

A country's natural resources should be a catalyst for socio-economic development in host countries and communities while creating value for our investors, and providing our people with an opportunity to contribute in a more extensive way.

Tullow seeks to deliver 'shared prosperity' through our business activities in the countries and communities where we work through optimising local content and building supplier capacity, building local skills and developing people, and by ensuring that we have focused socio-economic investment that enhances local economies.

Tullow's socio-economic programme is designed to deliver benefits for host countries and impacted communities in a tangible, transparent and sustainable manner.

In addition, Tullow sponsors events and programmes to build the Company's brand, and makes donations in certain circumstances, such as when natural disasters or emergencies occur in our areas of operation.

To maximise the value and impact of our funding, the **Non-Technical Risk Standard** must be followed when selecting or authorising new projects, sponsorships or donations.



✓ YOU MUST:

- ✓ Ensure that due diligence is conducted on prospective implementing partners/beneficiaries;
- ✓ Escalate due diligence red flags to your line manager.

✗ YOU MUST NOT:

- ✗ Promise donations or support for a project or event without receiving management approval as set out in the relevant standard or procedure;
- ✗ Authorise expenditure where you know or suspect that this would be misused or would provide monetary benefit to a Public Official.

? QUESTION:

"I have received a request from a senior government official, whom Tullow is engaging with, to make a cash donation to a charity they support. Should I make the donation?"

i ANSWER:

"There is a risk that any donation could be perceived as an attempt to influence the official on behalf of Tullow. You should discuss this request with your line manager and local Social Investment and Ethics & Compliance teams before responding."

Stakeholder engagement

Strong relationships are central to Tullow's success as a business and our priority is to ensure that the Company can negotiate and sustain agreement, legitimacy and trust in our countries of operation. Failure to engage effectively can lead to loss of trust, delays in executing our business plans and damage to our reputation.

We are committed to understanding and responding to the interests and concerns of our stakeholders, including host communities, national and local governments, regulators, international and national NGOs and multilaterals. The ability to build trust between Tullow and the governments and communities of our host countries, as well as industry partners and opinion formers is essential to building a sustainable operating environment.





Governments

Tullow staff engage with national governments in our countries of operation in many different ways, for example licence/contract negotiation, key aspects of the planning and execution of our activities, responding to government consultation on legislation/regulation relevant to our business and understanding our tax liabilities.

Tullow aims to create an informed environment through ongoing dialogue with all relevant national and local government departments and agencies at every stage of the project lifecycle. We also aim to ensure that all government engagement is conducted with integrity, respect and transparency and that we are never seen to be seeking undue or unfair influence in a country's policies and politics.

Lobbying and advocacy

Tullow defines lobbying and advocacy as the process of engaging with government to influence the outcomes of decision-making in relation to applicable laws and regulations. We comply with applicable national and international laws, and regulations on political engagement and lobbying, including registration and reporting requirements.

✓ YOU MUST:

- ✓ Contact your Government & Public Affairs team and obtain your line manager's approval for any expenditure on activities that could be considered as lobbying or political engagement;
- ✓ Ensure compliance with applicable local lobbying laws, tax and financial reporting requirements and this Code;
- ✓ Ensure that the contracts of all third-party intermediaries appointed to make representations to governments on behalf of Tullow also meet these requirements.

✗ YOU MUST NOT:

- ✗ Take part in discussions related to Tullow's business with any government official or employee unless you are a registered company spokesperson or lobbyist, or have obtained prior approval from your line manager and local Government & Public Affairs Manager;
- ✗ Appoint political consultants to engage with government on Tullow's behalf outside a written contract that complies fully with all applicable registration and reporting laws, including anti-corruption laws, without conducting proper due diligence checks and without compliance with this Code and applicable contracting procedures.

Transparency

Tullow is committed to good corporate governance and transparency. We believe that revenue and tax transparency can enable governments, citizens and international opinion formers to participate in the debate on how wealth from oil resources can be managed effectively.

We publish the payments and financial contributions we make to our host governments in compliance with applicable legislation and/or other government requirements (e.g. Extractive Industries Transparency Initiative). Tullow supports disclosure of its Production Sharing Agreements, but will only do this with the express support and agreement of our government partners.





PROTECTION OF FINANCIAL AND NON-FINANCIAL ASSETS

*We ensure adequate protection of our
financial and non-financial assets.*

? QUESTION:

"I have been asked to exclude some data from an environmental report I am compiling. While this would make the report look better and allow us to meet our team objectives, I am concerned that this missing data should actually be in the report. What should I do?"

i ANSWER:

'Exaggerating or falsifying information is a breach of this Code and could break the law. You should immediately escalate this issue to your line or functional manager, or use the Speaking Up channels available to you, for the appropriate action to be taken.'

? QUESTION:

"I have been asked to process a payment urgently to a supplier but a purchase order (PO) has not been raised yet. The only way this payment can be processed urgently is by doing this outside of SAP. Is this OK?"

i ANSWER:

'No, the Company has a 'No PO, No Pay' policy and therefore payments should only be made as per our internal control procedures.'

Accurate accounts and records

Accurate and complete information, whether financial or non-financial in nature, is essential to support sound business decisions, to comply with our legal and regulatory obligations and to meet our responsibilities to all our stakeholders.

There are strict rules and regulations governing financial transactions in all of the jurisdictions in which we operate. The accurate reporting of oil reserves, production, Local Content statistics and other business information is equally important.



We maintain effective accounting policies, standards and procedures, and we design and execute controls to ensure that all financial transactions are properly authorised, recorded and reported, in order to identify and respond to any error, fraud or misstatement. All books, records and accounts must reflect all business transactions accurately, transparently and in sufficient detail.

Cash transactions

Wherever possible, cash transactions should be avoided as the use of cash is more difficult to control than cheque or electronic transactions and may have the potential to result in illegal transactions, money laundering, lack of transparency and fraud. Where it is unavoidable, cash transactions or petty cash facilities must be approved by management with all transactions being properly and transparently accounted for and supported by adequate documentation. An effective system of monitoring and verification of cash transactions and periodic reconciliation of cash balances should be implemented to obtain assurance on adequacy of controls around physical cash.

Anti-money laundering

Money laundering is a term used to describe methods of concealing or disguising the origins and proceeds of illegal transactions. There are stringent national and international laws targeting those who engage in or assist with such transactions and Tullow does not engage in or support money laundering.

If you are ever asked to accept or make a payment in cash, to a bank or beneficiary or in a currency which has not been previously authorised or you are uncomfortable about any aspect of a financial transaction, then always seek advice from your line or functional manager prior to taking any action.



KEY MESSAGE:

All financial transactions must be accurately and transparently recorded in line with generally accepted accounting principles and internal accounting policies, standards and procedures.



YOU MUST:

- ✓ Comply with all relevant laws and external reporting and company reporting requirements;
- ✓ Seek the appropriate level of authorisation for financial and commercial transactions;
- ✓ Ensure that every transaction and all business data is honestly and accurately recorded;
- ✓ Cooperate with internal or external auditors when information is requested;
- ✓ Report any suspicion or knowledge of falsification or inaccurate information.



YOU MUST NOT:

- ✗ Operate outside the limits of your delegated authority;
- ✗ Deliberately falsify information or data in any media;
- ✗ Circumvent established internal controls.

? QUESTION:

"I have noticed that the consultants sitting nearby have left the office following the completion of a project and their unsecured Tullow laptops are on the desks. Should I bring this to someone's attention?"

i ANSWER:

'Yes, all our assets must be adequately protected and you should notify your local service desk so that the risk of misappropriation or loss is minimised.'

Asset protection

We are all responsible for protecting Tullow's assets which include people, property, facilities, equipment, IT equipment, funds, technology, patents, copyrights, information/data and any other resources or property. All Tullow assets must be properly secured and protected in order to maintain their value and to enable them to continue to function effectively.

All staff are responsible for protecting Tullow assets against waste, loss, damage, misuse, theft, misappropriation or infringement, and for using all of our assets responsibly.



Protecting the security of our people and workplace is critical. Staff must understand and follow site and business security procedures and promptly report any circumstances that appear to represent a threat to their security, other people or our assets.



SAFEGUARDING INFORMATION

*We commit to obtain, manage and
protect our information in accordance
with the law and to prevent
unauthorised disclosure.*

Information security is not about changing our established culture of openness, trust and integrity but we must realise that we work in a dynamic and competitive industry; an industry that is becoming more attractive to cybercrime and information theft. The prevention and detection of these threats is everyone's responsibility.

Information security

Our information is key to enabling us to make informed business decisions and is a valuable asset which must be adequately protected. In addition to the risk of internal information security incidents, the threat of cybercrime has increased over recent years with organisations and individuals attempting to breach security within companies to obtain confidential information or disrupt business. Breaches of information security can lead to a loss of competitive advantage, a breach of the law and ultimately, damage to the business.



Information security covers confidentiality, integrity and availability of information. Failure to properly protect access to systems which manage or process information as well as the information itself could have serious consequences.



FOR MORE INFORMATION:

Refer to the Information Security Standard.



Our information assets include hardcopy material (printed or written), information that is stored electronically and information that is verbally transmitted. Electronically stored information includes servers, websites, intranet, PCs, laptops, mobile telephones, tablets, as well as digital or magnetic media such as CDs, DVDs, portable or USB drives.

You must presume that all information regarding our activities, including geological data, reports, research and development work conducted by us or on our behalf is confidential, except to the extent it has already been made available to the public without restriction. Other examples of confidential information include non-public information on business acquisitions or disposals, business plans, major changes in management or company structure, financial information and personal information.

Staff must ensure that they protect Tullow systems and information from unauthorised access, use, disclosure or loss at all times. The duty to keep this information confidential continues even after your employment with Tullow ends. Any confidential information which is provided to us by a customer, business partner or other third party must also be treated in the same manner as our own.

✓ YOU MUST:

- ✓ Be aware of any legal restrictions on the use or disclosure of information that you use;
- ✓ Ensure that you keep confidential information secure;
- ✓ Use secure passwords;
- ✓ Lock your computer screen when you leave your workstation unattended;
- ✓ Encourage others to adopt good information security practice;
- ✓ Report any information security breaches of which you become aware.

✗ YOU MUST NOT:

- ✗ Share passwords or write them down;
- ✗ Disclose confidential information to unauthorised persons.

✗ YOU MUST NOT:

- ✗ Access, or attempt to access, sites which contain illegal or offensive material or images;
- ✗ Download files or media which could cause a disruption of our networks or degrade the service;
- ✗ Create, access, download, send or store media considered offensive, illegal, indecent or inflammatory.



Personal use of IT systems

Reasonable personal use of IT systems is permitted, provided that it is in full compliance with the Company's policies, standards and procedures and this Code. Personal use should not be at a level that distracts you from, or interferes with, fulfilling your duties for Tullow.

Email and data ownership

Tullow reserves the right without notice to review and monitor information and communications you create, store, transmit or receive on Tullow IT systems. Access and disclosure of any information or communication is based on Company discretion, an applicable business reason and subject to appropriate authorisation. Business reasons include, but are not limited to, compliance, monitoring use of telephone and computer systems, suspicion of misconduct, a breach of this Code or criminal activity.

FOR MORE INFORMATION:

Refer to the Tullow document **Protecting Value Procedure**.

Intellectual property and copyright

Tullow carries out its business in accordance with the framework of intellectual property laws that apply in the respective countries where we operate. You must ensure that your use of any published information resources complies with relevant legislation and with the terms of our licence agreements with publishers and distributors.

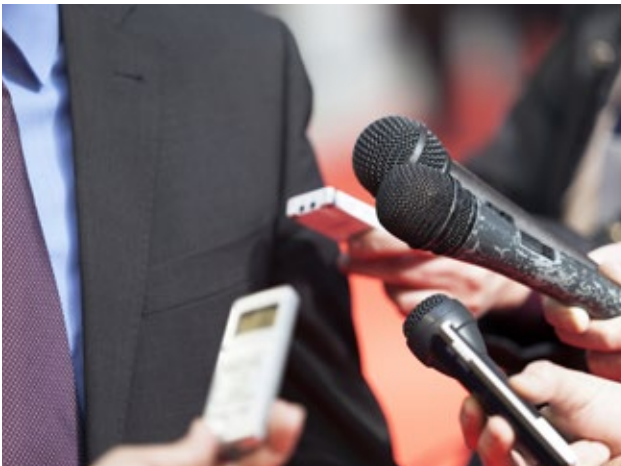
Our intellectual property includes physical or electronic data, reports, confidential business information, inventions, designs, videos and copyright materials and you must be careful to protect it and use it properly.

We respect the intellectual property of others when it is in our care and you must protect it in the same manner as our own.

Materials or publications subject to copyright may have legal restrictions on their use, copying or distribution and you must ensure that you are aware of any legal restrictions that apply and abide by these at all times.

External communications

You must not make any public communication regarding Tullow or its business to the press, analysts, investor community or the media unless authorised to do so. If you are approached or contacted with a request for information, then you should refer it to the Tullow Investor Relations and Corporate Communications team.



? QUESTION:

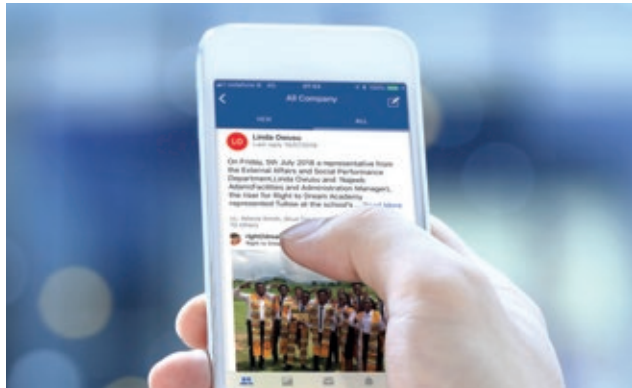
"I have been on a social media site and noticed that someone is discussing what I believe to be confidential information related to Tullow. What should I do?"

i ANSWER:

"You should bring the matter to the attention of the Ethics & Compliance team who can determine the facts and take any appropriate action."

Social media

All staff who use, or engage in conversations, on social media (Twitter, Facebook, LinkedIn etc.) must take care that they do not speak on behalf of Tullow unless authorised by the Investor Relations and Corporate Communications team. You must not divulge or discuss confidential information or the personal information of others. Inaccurate or misleading statements could cause misunderstandings, violate commercial contracts or confidentiality agreements, result in liability for Tullow and/or its staff, damage relationships and/or break the law.



EU General Data Protection Regulation (GDPR)

We comply with the EU General Data Protection Regulation (GDPR) which is designed to strengthen the rights of individuals regarding their personal data and seeks to unify local data protection laws. For more information please refer to the **GDPR Privacy notice for Employees, Workers and Contractors**.

All staff, or third parties who act on our behalf, who process personal data must implement appropriate measures to ensure and demonstrate that any data processing is performed in compliance with the GDPR requirements, including principles such as lawfulness, fairness and transparency, accuracy, purpose limitation, data minimisation, storage limitation, integrity and confidentiality. For more information please refer to the **Data Privacy Standard**.

MONITORING AND REPORTING

*We actively monitor compliance
with our Code and ensure
consistent enforcement.*

Monitoring and reporting

Every manager is responsible for ensuring overall compliance with the Code, policies, standards and procedures in order to provide assurance to senior management and the Board that we have embedded the required controls and that the expected behaviour across the Group is being achieved.

The Head of Ethics & Compliance is responsible for monitoring compliance with various elements of this Code and will do this using a variety of means, including periodic management reports, review of the online compliance systems such as those used for recording gifts and hospitality, conflicts of interest disclosures, reviews of accounting records, the annual Code certification process and, where necessary, carrying out investigations.

The Head of Internal Audit is responsible for managing and delivering the risk-based internal audit programme to provide senior management and the Audit Committee with independent and objective assessment of the adequacy and effectiveness of risk management processes and internal controls defined in the Code, policies, standards and procedures.

External, independent reviews are also carried out periodically to provide additional assurance.

Incidents of suspected or actual misconduct and losses must be formally reported in line with the **Misconduct and Loss Reporting Standard** to provide a group view of breaches and outcomes, and ensure consistent enforcement of our Code, including implementation of any corrective action.

The level of compliance with elements of the Code, together with the outcome of investigations resulting from actual or suspected breaches, are periodically reported to the Audit Committee or the main Board.

A photograph of two women sitting at a wooden table in a modern office setting, with a large window in the background showing a cityscape. One woman is on the left, wearing a light-colored blouse, and the other is on the right, wearing a dark top. They are both looking at each other and appear to be in a conversation. A laptop is open on the table in front of the woman on the left. The image has a warm, sepia-toned overlay.

SPEAKING UP

We are committed to maintaining a working environment where concerns can be raised confidentially, are listened to and are acted upon without fear of retaliation.

Speaking Up

Our aim is to provide a supportive and listening culture where anyone who works for us feels empowered and comfortable in raising concerns. If you have any concerns related to our business practices or believe that the requirements of our Code have been breached, then we encourage you to speak up. This applies whether the concern relates to a member of Tullow staff or anyone performing services for us.

We are committed to maintaining the highest standards of integrity, transparency and business conduct and raising concerns early enables us to determine the facts and take any appropriate action. Speaking up helps to put things right whilst protecting individuals and the Company and thus safeguarding our good reputation.

Company commitment

Tullow does not tolerate retaliation in any form against any individual who speaks up in good faith even if the concern is later determined to be factually incorrect or unfounded. We treat all speaking up cases seriously and when required, we initiate an investigation with trained personnel to determine the facts. Where we consider it necessary, we inform the relevant authorities or law enforcement agencies.

? QUESTION:

"I suspect that someone is committing fraud but I cannot be absolutely certain. Should I report it?"

i ANSWER:

'Yes, if you genuinely suspect that a fraud, or any other breach of the Code, is taking place, then you should report it in confidence to your line or functional manager or use Safecall. As long as you raise an issue in good faith, you are doing the right thing in reporting it even if it is unproven or your suspicions are incorrect.'

What to report

You can report any concern; in particular, anything that is unsafe, unethical, breaches our Code or could harm an individual or Tullow, **must** be reported.

Examples of these concerns include actual or suspected incidents where there is:

- Action or intention to commit a criminal offence;
- Disregard for the environment, health, safety, security or human rights;
- Financial irregularity or suspicion of bribery, fraud, tax evasion or theft;
- Bullying or harassment of an individual;
- Any action to hide or cover up wrongdoing.



How to Speak Up

Internally – The most common method of raising a concern is to discuss it internally with your line or functional manager or any other manager in the Group. Management have a responsibility to listen to your concern and must either work with you or other relevant staff to ensure that it is properly addressed. Managers must also ensure that they follow the reporting and escalation process detailed in the **Misconduct and Loss Reporting Standard**.

Externally – If you are not comfortable with speaking up internally then you have an alternative, confidential speaking up mechanism called Safecall. Safecall is an **independent** company which provides a speaking up service to many different organisations.



KEY MESSAGE:

If you Speak Up, you are doing the right thing.

Confidential external reporting channel – Safecall

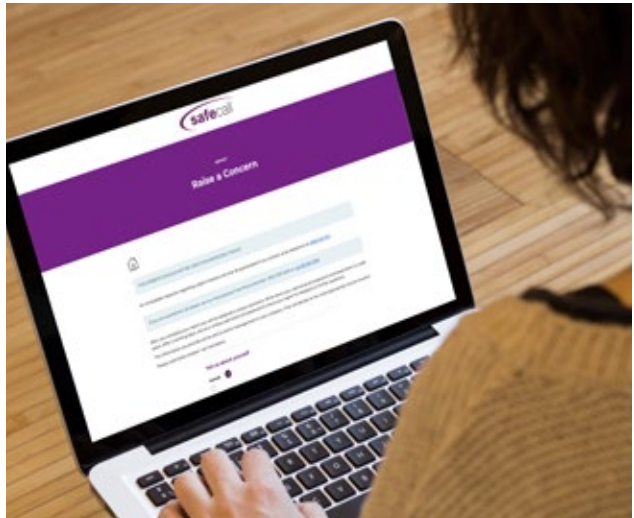
Safecall is available 24 hours a day, 7 days a week and they can be contacted using the telephone numbers provided on the opposite page. Safecall treats all communications in confidence and a trained operator will listen to your concerns, ask relevant questions and prepare a detailed report. This confidential report is submitted to the Tullow Head of Ethics & Compliance who determines any action required.

You can also contact Safecall using their email address (see opposite page) or by submitting a report via the online portal on their website.

Our preference is for you to report openly and to provide your name to Safecall so that we can contact you to ask questions, obtain further information at a later date or provide you with feedback.

However, sometimes individuals are reluctant to report openly and where this is the case, you can use Safecall anonymously and we will still treat the information received seriously and in confidence. It is important that you provide as much information and detail as you can to help maximise the chance of resolution.

I wasn't sure whether to raise a concern at first but the Safecall process was so easy to use and it did result in action being taken.





Contacting Safecall

Safecall can be contacted via the local free phone numbers below or via the international number provided. Telephone calls are not recorded.

UK

☎ 0800 915 1571

Ireland

☎ 1800 812 740

Ghana

☎ 0302 742 249

Kenya

☎ 0800 720 182

South Africa

☎ 0800 990243

Uganda

☎ 0312 564 099

Other locations

☎ +44 191 516 7764

Web form: www.safecall.co.uk/reports

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