



Tullow Oil: Modern Slavery Statement

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Tullow Oil plc.

Introduction

Tullow¹ is committed to respecting internationally recognised human rights, including fundamental labour rights and international labour standards 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 recognise that the nature and context of our business – which is often based in remote areas in developing countries – exposes our business and supply chain to the potential risk of instances of modern slavery and human trafficking, including underage, forced or bonded labour. We work to continually assess the extent of this risk and to take steps to ensure that modern slavery has no place in Tullow’s business or supply chain.

About Tullow

Tullow Oil plc is a leading independent oil & gas exploration and production company, headquartered in London and listed on the London, Irish and Ghanaian stock exchanges. Our portfolio of over 80 exploration and production licences spans 16 countries. We create value for our business by finding, selectively developing, producing and selling oil. Our business model describes how the different parts of the Group work together to run our business and create value, and can be found on our [website](#).

Our Supply Chain

The risk of modern slavery occurring in Tullow’s own business or supply chain will in part depend on the level of activity being carried out in each country, which ranges from the recent acquisition of exploration licences through to both operated and non-operated production.

We rely on international suppliers, as well as local suppliers in our countries of operation, to deliver key components of our operations.

Prior to contract award, we raise awareness amongst our suppliers of our Code of Ethical Conduct (the Code). In 2017, we updated our supplier due diligence procedures to cover modern slavery specifically. Where appropriate, potential suppliers need to declare whether their organisation and affiliates have been convicted of any offence involving modern slavery, or whether they are subject to any investigation, inquiry or enforcement proceedings relating to slavery, servitude, forced or compulsory labour, human trafficking or child labour. We also expanded our supplier audit process to include appropriate risk-based assessments of human rights and labour conditions.

¹ Tullow Oil plc is the parent company of the Tullow Group of companies. In this statement, “Tullow”, “we”, “us” and “our” are sometimes used to refer to Tullow Oil plc and its subsidiaries.



In 2018, Tullow also began to introduce specific contractual clauses requiring suppliers to comply with applicable anti-slavery and human trafficking laws.

Governance, Policy and Standards

Tullow Oil plc is governed by its Board, which approves the company's strategy, determines its key policies and reviews management and financial performance.

Tullow's Code of Ethical Conduct prohibits the use of underage, forced or bonded labour and sets out our expectations on respect for fundamental labour rights and freedom from harassment. Our speaking-up mechanism is designed to provide employees, suppliers and contractors with a safe and secure method of reporting matters related to their working environment.

Our [Human Rights Policy](#) sets out our commitment to respecting internationally recognised human rights, including fundamental labour rights such as the elimination of forced or compulsory labour. Tullow seeks to identify and assess human rights impacts related to our operations, including through requirements in our Environmental and Social Impact Assessments.

Training

All Tullow staff (which refers to the Board of Directors, all Tullow employees and contract, agency or temporary workers) are required to complete the Company's Code of Ethical Conduct e-learning course, which was developed to support application of the Code in our day-to-day activities. In 2017, all Tullow staff completed this course. As noted above, the Code prohibits the use of underage, forced or bonded labour. We also undertake an annual certification process, obtaining disclosure from all Tullow staff about their level of compliance with the Code and its accompanying standards, procedures and guidelines.

During 2017, Tullow carried out due diligence training across our Supply Chain function to reinforce awareness of the processes in place to prevent modern slavery in our supply chain.

Next steps

In 2018, we will continue to emphasise to our suppliers our commitment to ensuring that modern slavery and human trafficking is not part of our supply chain.

We also plan to review our Code of Ethical Conduct, enhancing the human rights section further with an explicit reference to modern slavery.

This statement was reviewed and approved by the Board of Tullow Oil plc.

Signed for and on behalf of the Board of Tullow Oil plc.

A handwritten signature in black ink, appearing to read "P. McDade".

Paul McDade, Chief Executive Officer, 20 June 2018