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Focus on Sustainability Tullow Oil plc Sustainability Report 2020





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Front cover: Akosua Gyan Bandoh, TEN Operations Engineer for Tullow



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About this report

Tullow's 2020 Sustainability Report complements our 2020 Annual Report disclosure and provides further details of our environmental and social performance over the past year. This Sustainability Report was prepared in accordance with the Global Reporting Initiative (GRI) Standards (2016) core option. GRI Standards represent the most widely used sustainability reporting framework in the world today. GRI principles have informed our reporting approach: materiality (the issues relevant to our most significant impacts and which are of most importance to stakeholders), stakeholder inclusiveness (responding to stakeholder expectations and interests), sustainability context (presenting our performance in the wider context of sustainability issues) and completeness finclusion of all the information which reflects significant economic impacts to enable stakeholders to assess our performance).

Our disclosure was also informed by the International Petroleum Industry Environmental Conservation Association (IPIECA) Oil and Gas Industry Guidance on Voluntary Sustainability Reporting and the Sustainable Accounting Standards Board.

Tullow's key findings in response to the recommendations of the Task Force on Climate-related Financial Disclosures are covered in the Annual Report and this Sustainability Report and additionally are covered in full in a separate report: Climate Risk and Resilience report.

Quantitative data in this report relates to the 2020 calendar year and covers our global operations unless otherwise stated. Tullow's Greenhouse Gas emissions data from its operated assets has been externally assured and this year, we have also published Tullow Oil's 'GHG Emissions scope & calculation methodology'. You can find a link to the assurance statement here. Our basis for reporting (all data collection methodologies) are noted in a separate document available for download here. We welcome your feedback and invite you to send comments to: **sustainability@tullowoil.com**

Tullow supports the following standards and partnerships:

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 Image: Stope Reporting Initiative
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Tullow's suite of Sustainability Reporting



2020 Sustainability Report



2020 Annual Report







CODE OF

ETHICAL CONDUCT 1 d

Code of Ethical Conduct



2020 Payments to Government Report

About Tullow Oil

Tullow is a well-established, recognised oil and gas explorer and producer

Our focus is on producing low cost oil and gas in a safe, efficient and environmentally and socially responsible way.

Our key activities include generating material value for host countries, creating local business opportunities and building a compelling proposition for investors and a great place for employees to work.

Our portfolio of over 50 licences spans 11 countries. We are headquartered in London and our shares are listed on the London, Irish and Ghana Stock Exchanges.

Tullow's portfolio evolved in 2020 with the farm down of our equity in Uganda and our exit from country, as well as the demobilisation of operations in Kenya. Therefore, although the ESG data published here includes both Uganda and Kenya, our disclosure on both countries is limited.



Message from our CEO

Despite the challenges of dealing with the pandemic and the significant reduction in staff numbers, Tullow worked hard to prioritise the health and wellbeing of its staff, maintain our social investment commitments to host communities and plan for an improved carbon emissions performance for our operated assets.



Dear Reader

2020 was a year when the resilience of our people and our business was tested in full. In addition to the operational challenges presented by the COVID-19 pandemic, and the unprecedented volatility in the oil markets, Tullow also underwent significant organisational restructuring to reduce our cost base and make us a more efficient organisation. Notwithstanding these challenges, the company remained steadfast to its sustainability commitments, honouring our financial commitments to social investment partners and progressing our Net Zero strategy.

With a COVID-19 emergency committee established in February 2020, our people rose to the challenge, swiftly adapting to working from home and maintaining operational performance to meet our commitments to host governments and our investors, lending banks and bond holders. As the global pandemic spread, protecting the health and safety of our people and the communities in which we work in became an urgent priority. I am proud of the way in which our teams worked collaboratively and resolutely to meet our production targets whilst managing the health of our staff and contractors. As the year progressed we had to manage, as many businesses had to, a number of cases of the virus on our FPSOs and in our offices, but were thankful that all our people and contractors could return safely home to their families.

Safety Performance

Tullow had a disappointing 2020 safety performance, where we recorded more Lost Time Injuries (LTIs) and Total Recordable Injuries (TRIs) in 2020 than 2019. Although this result is unacceptable, none of the events at our controlled activities were life changing. We remain committed to preventing the injury of all people associated with our operations all of the time. Notwithstanding this disappointing performance, we achieved zero recordable injuries at our Ghana offshore TEN and Jubilee FPSOs and Zero recordable injuries in our Kenya facilities. Despite those achievements, our overall number of TRIs highlights the further progress we must make to ensure that safety is a priority for everyone, everywhere across the Group.

Net Zero

In 2020 we set out to define a decarbonisation plan and determine a timeframe for our Net Zero commitment. This work culminated in Tullow committing to become a Net Zero Company by 2030. Significant work has been undertaken to review every option possible for our producing assets, however, the single largest opportunity to decarbonise the business is the elimination of routine flaring. Over the next five years, this will be achieved by managing the business' current dependencies on the need for routine flaring, namely: debottle-necking of gas systems on Jubilee and TEN; ensuring the continued offtake of current volumes to the Government of Ghana: and securing a commercial agreement with the Government of Ghana on future gas offtake volumes. which in turn is dependent on the growth of gas demand in Ghana. These decarbonisation efforts will set Tullow on a path to reduce emissions on a net equity basis by 40 per cent relative to a 2020 baseline. Further identified emissions can reduce emissions by a further 5 per cent. Carbon offsetting will also be required to achieve a carbon neutral or Net Zero status, and work is underway to determine the right carbon offset strategy for Tullow.

Refreshed purpose

Towards the end of the year, I worked with my colleagues on the Senior Leadership Team to re-evaluate and refresh our purpose, which has been defined as: 'building a better future through responsible oil and gas development.' This purpose is based on the belief that oil and gas will continue to play an essential role in the global energy mix for the long-term, and that host governments around the world will continue to greatly value the capability, connectivity and capital that companies like Tullow can provide.

At Tullow's Capital Markets Day in November, we set out our 10-year plan outlining our intent to invest billions of dollars, which will generate significant revenues for our host countries, create local business opportunities, and ensure our business is run in a responsible and low carbon way, whilst building a compelling proposition for investors and a great place to work for employees.

Robul Dhis

Rahul Dhir, Chief Executive Officer

Our sustainability framework

Our approach to sustainability is driven by our purpose to build a better future by responsible oil and gas development. Sustainability is operationalised across the business through the implementation of our strategy, management standards, governance and audits.

Our approach also considers the expectations of our key stakeholder groups our banks and investors; our host governments and communities; and our employees as well as the material issues for the sector, reflected in the work of IPIECA, the Sustainability and Accounting Standards Board (SASB) and the UN Sustainable Development Goals (SDG). Our sustainability framework, set out opposite, has four pillars which combine all these inputs and expectations. The only update to the framework in 2020 was to consolidate the focus on the SDGs which we can meaningfully aim to contribute towards.

Strategic pillar	Safe operations	Shared prosperity	Environmental stewardship	Equality and transparency
Key themes	Safety & Wellness Responsible production	Local content and capacity Developing local skills Social investment	Climate resilience Protecting ecosystems	Good governance Promoting equality
Material topics	Employee health & safety Process safety Emergency response	Local content and capacity Community development Social investment	Climate change Biodiversity Spills Waste	Compliance Anti-corruption Human rights Inclusion & Diversity Tax transparency
SDG alignment	3 minutes and 	4 metric 1 metr	13 ::::	10 mmer

Governance Framework

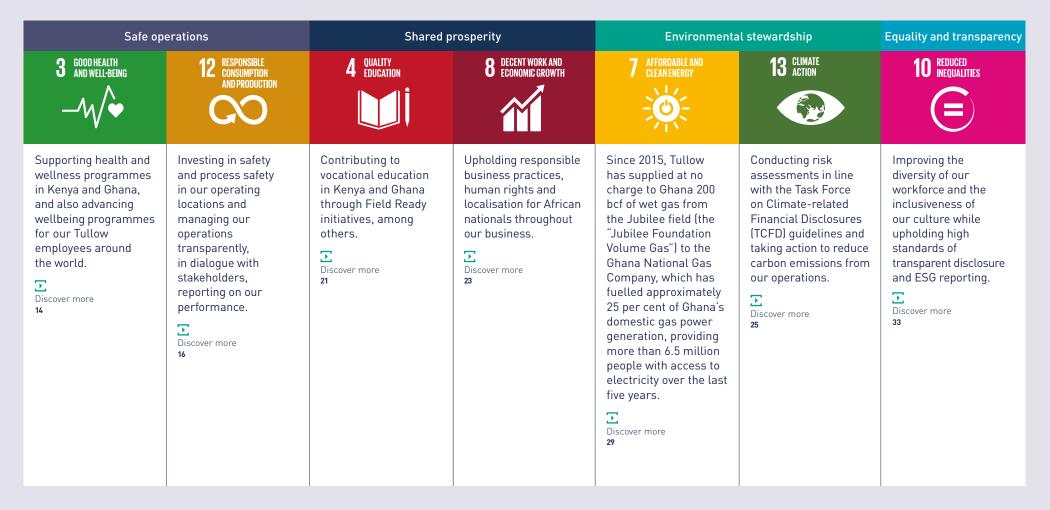
Tullow delivers on its Sustainability plans through the following Governance Framework which sets out the Board and Senior Leadership Team oversight, the Policies and Standards that describe our commitments and the Principal Risks that we seek to mitigate and the KPIs which target our areas for improvement. For more information on our Board Governance, Principal Risks and Group Scorecard go to the Annual Report & Accounts and Climate Risk and Resilience Report.

Safe operations	Shared prospe	erity	Environmental stewardship		Equalit transpa			
	Board of Directors							
Remuneration Committee	Nominations Committee		Safety & Sustai Committe		-	Audit Committee		
	Senior Leadership Team							
Safe & Sustainable Operations			Climate Policy		Code of Ethical Conduct			
Non-t	chnical Risk Standard				Human Rights Policy			
		Princip	al Risks					
EHS or Security risk	Stakeholder risk		Climate change risk		Organisation risk Conduct risk			
		Key Performa	ance Indicators					
Level 0 KPIs: Group Total Recordable Injury Rate, Group Tier 1 & 2 Loss of Primary Containment Level 1 KPIs: Tullow Ghana Recordable Injuries, High Potential Incidents, Loss of Primary Containment 1 & 2, EHS assurance	Level 0 KPIs: Embed Sust across the organisation Level 1 KPIs: Delivery 202 investment plan & develop shared prosperity strategy revised Local Content	21 Social 5 long-term	Level 0 KPIs: Emb across the organise Level 1 KPIs: Prog		across the org Level 1 KPIs:	Make significant progress performance management		

Level 0 KPIs are tracked by the Board. Level 1 KPIs are tracked by the Senior Leadership Team.

Aligning our goals

Aligning and supporting the UN Sustainable Development Goals (SDGs) The areas in which we can make the most significant contribution through our work are the following SDGs.



Primary stakeholders of Tullow Oil

We use a range of ways to engage with our primary stakeholders so that we understand their concerns and expectations. The next two pages sets out our stakeholder engagement overview in 2020:

Host communities



Primary means of engagement

Our local social performance teams adopted a digital stakeholder engagement plan due to COVID-19, which included phone calls, virtual meetings and radio.

Key expectations

Providing project development and operational updates.

Managing project related grievances.

Providing updates on socio-economic investments and local content opportunities.

Progress in 2020

Through our digital engagement channels, we reached about 300 coastal communities to educate fishermen on offshore safety. Fishermen, fishmongers, canoe owners, chiefs and local government officials were kept updated on all ongoing community development initiatives in the Western Region. See also the other sections in the Shared prosperity chapter, covering socio-economic investment and local initiatives.

Host government



Primary means of engagement

Our Senior Leadership Team supported by our local public affairs team engage with governments at the local and national level, via direct meetings, roundtable discussions, stakeholder surveys, advocacy work and industry collaborations. In 2020 most of these engagements were virtual.

Key expectations

Updates on business performance and issues, and gain insights which inform the development of our interventions. The development of local content and capacity is of prime importance.

Progress in 2020

Despite COVID-19 related travel restrictions, Rahul Dhir had the opportunity to meet virtually with many of our key stakeholders across Kenya, Gabon, Cote d'Ivoire, Suriname and Equatorial Guinea. In October, Rahul was able to visit Ghana where he had the privilege of meeting His Excellency The President of Ghana, the Minister of Finance, the Minister for Energy and other senior officials.

Local Suppliers



Primary means of engagement

Our head of Supply Chain and Local Content Manager moved Tullow's usual physical Local Content Forums to virtual events in 2020. Tullow's contract holders engaged with suppliers through procurement tenders and business reviews.

Key expectations

Information regarding business opportunities within Tullow's supply chain and how to apply for those, participation in capacity building initiatives to help local suppliers reach the international standards required by the oil and gas sector.

Progress in 2020

Two of the key engagements with suppliers in 2020 included 185 indigenous suppliers taking part in virtual training on Tullow's new procurement and contract management system and 57 SMEs benefitting from Tullow and Invest in Africa supplier virtual workshop focusing on Business Recovery and Effective Tendering.

Colleagues



Primary means of engagement

The Senior Leadership Team communicated via detailed written and virtual townhall communications and initiated Coffee Sessions – small group discussions and sessions where any question could be posed to the Senior Leadership.

Key expectations

Timely and transparent communications about the business, and to understand what organisational changes are being implemented and how they would affect staff. Additionally, the opportunity to advance professionally for African nationals in their country.

Progress in 2020

As well as regular, open communications about organisational changes, Tullow relaunched its purpose, strategy, values and Employee Value Proposition to articulate the benefits of working for Tullow and how individuals could contribute to the company's goals.

Lending banks and investors



Primary means of engagement

The CFO, Chief Petroleum Engineer and business leaders host technical reviews as part of the 6-monthly redetermination of our Reserves Based Lend facility. The CFO also meets with bondholders regularly. The Board and leadership team host virtual presentations and meetings and correspond with investors in writing.

Key expectations

Understanding of the company's new 10-year plan and refinancing plans. Reliable financial and production forecasts, strong governance and ethical conduct.

Progress in 2020

Presentation of the company's new 10-year plan at the Capital Markets Day. Completion of the January and September RBL redetermination.

Non-governmental organisations



RAGE TANKS

Primary means of engagement Business leaders and our sustainability team members engage with NGOs via ad hoc virtual and written communications.

Key expectations

Proactive and transparent disclosure regarding our stakeholder management processes, governance, and environmental and social impact in our communities of operation.

Progress in 2020

Continuous engagement with Oxfam on stakeholder engagement, FPIC and transparency in Kenya and Ghana.

Engagement and cooperation with the office of the Compliance Advisor Ombudsman, the independent accountability mechanism for the International Finance Corporation (IFC), following complaints made related to exploration activities in Kenya Block 12A.

2020 Sustainability highlights

Safe operations

- Zero recordable injuries on Jubilee & TEN
- Zero recordable injuries in Kenya facilities
- Zero Tier 1 process safety incidents
- New cumulative risk model rolled out
- Over 900 instances
 of participation across
 14 virtual wellness events
 across the UK and Ghana

Shared prosperity

- \$1.9bn spent with local suppliers over the last seven years
- \$3.2m financing for local businesses through Invest in Africa
- \$162 million invested with local suppliers in 2020
- Construction of dormitory accommodation at three secondary schools
- 320 pupils in four kindergarten schools instructed using the active play-based pedagogy helping them acquire 21st century skills

Environmental stewardship

- 2030 timeframe for Tullow's Net Zero ambition set
- Established commitment to eliminate routine flaring by 2025
- Decarbonisation options to reduce emissions* by 40-45 per cent identified
- Increased transparency of Scope 3 emissions through reporting Non-operated emissions
- Increased understanding of composition of emissions from vented gas reduced methane emissions by 98.8 per cent
- Power savings of 35-40 per cent generated by solar panels on Takoradi office roof

Equality and transparency

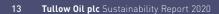
- Total socio-economic contribution of \$542 million
- New I&D statement written, highlighting Tullow's renewed commitment
- 100 per cent of employees completed Code of Ethical Conduct e-learning and certification process
- 46 per cent of finance managers are female, beating our 2020 target of 40 per cent
- Launched new Employee Value Proposition

Safe operations

Safe Operations is a core pillar of our sustainability framework and provides a commitment to safe working, safe processes and effective emergency response.

"Protecting the safety of our employees, suppliers, contractors and collaborators, and the communities within which we operate, is of the utmost importance. Leadership and accountability are vital to a strong safety culture and while we have focused hard to create this in 2020, we have more work to do in order to achieve a better safety performance which Tullow's leadership is committed to."

Wissam Al-Monthiry, Managing Director, Tullow Ghana





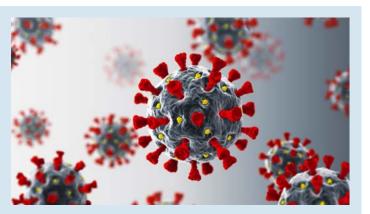
Occupational health and safety

Tullow is committed to the highest standards of health and safety and we strive every day to maintain a positive safety culture across our business. We have a culture of working hand in hand with our contractors as one team, working to keep everyone safe and healthy. We adhere to all laws and regulations governing safe working and, in many cases, our internal standards go above the requirements of the law.

Assuring occupational health

We continue to monitor key health risks related to our operations and take preventive action where possible. A known risk, for example, is malaria and we recorded no cases among staff and contractors that have no immunity to Malaria in 2020.

Managing Tullow's response to the COVID-19 pandemic dominated much of the year. Thorough risk assessments and plans were put in place across our operations, both on the FPSOs and in the office to protect the health of our staff and contractors, whilst maintaining safe COVID-19-free production operations and work environments.



COVID-19 and Tullow Ghana

Getting critical rotational staff from abroad into our main country of operation, Ghana, became especially complex between March and September, after Ghana imposed border restrictions resulting in the suspension of scheduled flights. Tullow chartered 15 flights in that period and the company is grateful to the Government of Ghana for allowing these flights to operate. All team members were guarantined before going offshore, making for some lengthy periods away from home. This has placed a strain on the teams and measures were identified to help improve the conditions of quarantine, including better exercise arrangements and faster testing processes. We have evolved our working ways to minimise the health and well-being impact on all personnel and to ensure that our overall safety performance is not impacted. Despite all of the measures implemented some of our team did test positive for COVID-19, including 84 at our offshore facilities. Fortunately, the number of COVID-19 cases were contained without escalation and all those impacted have fully recovered.



Wellness Programme In 2020, Tullow ran a wellness programme to encourage and

In 2020, Tullow ran a wellness programme to encourage and support employees to prioritise their physical and mental wellbeing, against a backdrop of increased virtual working and significant organisational change. A programme of activities was supported by expert speakers and instructors including: CardioPulmonary Resuscitation (CPR) training, wellbeing and nutrition talks, meditation, a walking for fitness talk and challenge, online workouts, yoga, presentation on the 'myths' of weight training and mindfulness drawing. Finally, there was a Cooking challenge, where employees cooked a favourite dish representing their culture, which created a sense of togetherness and an appreciation of each other's cultures. In addition, staff were given a Tullow Wellness Time Out afternoon and a Tullow Appreciation Day, time off work in addition to their statutory holiday. Tullow's safety performance in 2020 for lost time injury rate (LTIR) and Total recordable injury rate (TRIR) indicate that we injured more people in our operations compared to 2019. Fortunately, none of the events were life changing, but never-the-less, we strive to eliminate injuring people associated with our operations.

Notable occupational safety achievements in 2020

- Zero total recordable injuries at our Ghana offshore TEN and Jubilee floating production storage and offloading facilities (FPSOs)
- Zero total recordable injuries in our Kenya facilities

High potential incidents (HiPos) are defined as any incident or near miss that could, in other circumstances, have realistically resulted in one or more fatalities. We focus on learning from these events to prevent actual significant incidents from occurring.

Despite these positive aspects of our safety performance, during 2020, we experienced a similar number of HiPos compared to 2019. Although we work to avoid HiPos, transparent reporting of them is vitally important and actively supported at Tullow, so that we can continually learn and make improvements. Following a number of HiPo events associated with our Tullow Ghana operations, the Tullow Ghana leadership held a series of safety stand-downs across all parts of the business. The discussions were rich, the passion to improve safety performance evident and a clear improvement plan developed.

Sadly, we recorded a third-party fatality in Ghana, when one of our contracted trucks was involved in a road traffic accident. We continuously work with our road freight contractors to ensure that all appropriate measures are implemented to reduce such events. In 2020 we have spent time analysing similar or repeated incidents that have occurred over the years at our Ghana operations. These reviews have informed where our assurance activities are to be focused and are leading to improvements to our incident investigation processes. Part of these improvements included the company wide implementation of a new incident reporting, investigation and action tracking software tool.

The highlight of 2020 was Tullow Ghana's IOGP lifesaving rule awareness raising campaign. It spanned a three month period, involved senior leadership and all contractors involved in our operations, promoting each rule and involved presentations, experience sharing, quizzes and more.



"Tullow's 2020 IOGP lifesaving rule awareness campaign was the most inspiring and engaging I've ever participated in and I am confident will translate to a better safety performance in 2021."

Rowland Wright, Environment, Health, Safety and Asset Protection Manager, Tullow Ghana

Process safety

Process safety relates to the prevention of major accident hazards, such as explosions, fires, and toxic releases associated with the use of chemicals and petroleum products. Tullow addresses process safety through policies, standards and risk management activities covering all our operations from planning to decommissioning.

During 2020, operations in Ghana continued to close identified gaps against the Tullow process safety management standard. Building on the findings of previous audits and self-assessments, the Process Safety / Asset Integrity Improvement Plan was implemented in 2020. Significant improvements were made around the management of safety and environmental critical elements (SECEs), including a rebuild of the computer maintenance management system (CMMS).

Process safety performance in 2020.

Overall, our process safety performance in 2020 improved with zero Tier 1 process safety events (PSE) related to Loss of Primary Containment (LOPC) releases. However, we experienced four Tier 2 process safety LOPCs, three on the Jubilee FPSO and one of the TEN FPSO. These events were controlled and mitigated by the on-board safety systems and resulted in no harm or injury to any individual, and no environmental damage. In 2020 we have developed a new cumulative risk model (CRM) which is being run in parallel with existing processes. The CRM has a significant number of inputs, including maintenance status, cases to operates (deviations where performance standards cannot be archived), safety critical training completion, defined life repairs, inspection anomalies, LOPCs.

There have also been some significant changes to our Jubilee operations, including the finalising of the permanent spread mooring and commissioning of the oil offloading system. These have resulted in significant risk changes and therefore the formal safety assessments and safety case have been updated. Workforce engagement during Safety Case updates is vital and has been an important part of the process.

Process safety events (PSE)	2018	2019	2020
Tier 1	0	1	0
Tier 2	2	3	4
Total	2	4	4

Managing spills and releases

We take every precaution to minimise the risk of spills at our facilities or in transit and operate in accordance with the highest process safety standards. We maintain oil spill response plans and on-site spill response capabilities, enabling us to act quickly to A Tier 1 PSE is a LOPC with the greatest consequence. This involves an unplanned or uncontrolled release of any material, including non-toxic and non-flammable materials, that results in serious injury or fatality, community evacuation, fire or explosion causing significant financial impact etc.

A Tier 2 PSE is an LOPC with lesser consequence. This involves an unplanned or uncontrolled release of any material that results in a recordable injury, fire or explosion causing lower financial impact etc.

A full definition of Tier 1 and 2 PSE can be found online at the IOGP website.

contain and minimise damage should uncontrolled releases of any material occur.

IOGP Process Safety Fundamentals

As active members of the International Association of Oil and Gas Producers (IOGP), we were very excited when the process safety fundamentals (PSF) were formally issued in November 2020. These aim to influence the behaviours of the front line workforce so they follow safe systems of work and good practices and recognise and report hazards and to reduce the risk of process safety events. We are adopting the IOGP process safety fundamentals and are planning to formally launch them with a significant campaign in Q2 2021.

Asset protection and emergency response

We operate in an industry with significant potential threats to life and the environment, and we continue to be able to rapidly adapt and respond to unforeseen events in order to maintain business continuity and minimise negative impacts on people, the environment, our physical and intellectual assets, and our reputation. We do this through asset protection policies, standards and plans incorporating corporate security, business continuity, and crisis and emergency management (CEM), to maintain preparedness to respond to any emergency.

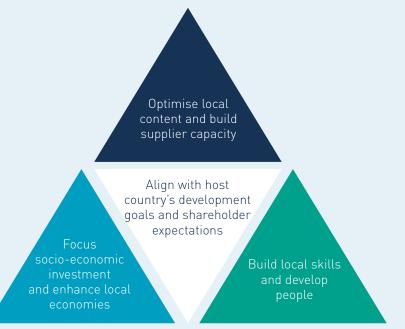
We regularly train our colleagues and contractors using credible emergency scenarios in CEM preparedness exercises across the business. In 2020 our focus has been on COVID-19 response and oil spill response preparedness.

Shared prosperity

Shared prosperity remains central to our approach to sustainability. In 2020 Tullow updated its purpose and business strategy with the aim of building a better future through responsible oil and gas development and partnering with governments and, communities to support economic development in the counties where we operate.

The impact of the COVID-19 pandemic and our engagements with governments have led us to continue to prioritise local content and social investment into education and skills development to enhance employability, and enterprise development including agricultural livelihoods to increase local entrepreneurship. In 2020 we maintained our support to our partners and have helped address some of the inequalities in access to virtual education and supported entrepreneurs in building their resilience during the pandemic. This has been alongside donations of PPE for the pandemic.

Together with our JV Partners we continue to work towards mitigating our social and environmental impacts and are now focussed on working with local communities to develop and implement projects that not only help mitigate climate impacts but also support livelihoods.



Manage project impacts

Stakeholder engagement

Shared prosperity delivery requires understanding the political, social, environmental and economic context and how our operations impact neighbouring communities. Our local teams ensure that we not only understand the context and impacts but also the benefits that can arise from our activities.

2020 has meant that local engagement team members have had to adapt their engagement approach with less face to face engagements and more reliance on other digital channels.

With the scale-back of operations in Kenya and our exit from Uganda our local engagement teams have ensured that our scale-back or exit has been professionally managed and local communities have been engaged. Outstanding commitments made by the Company have been captured and work is underway to ensure that these are closed.

Community consultation – Ghana

The Social Performance team developed a digital stakeholder engagement plan as a response to COVID-19 restrictions. The team employed phone calls, radio jingles and adverts as part of community sensitisation on offshore operations and incursions. Communal engagements were done via local radio stations across the four coastal regions of Ghana. Engagements to ensure the fishermen's sasfety around our offshore installation were conducted on community radio stations across coastal communities in Ghana.

These coast-to-coast engagements reached over 320 fishing communities across the shores of Ghana and were successfully executed in collaboration with agencies and organisations including the Petroleum Commission of Ghana, the Ghana Environmental Protection Agency, the Ghana Maritime Authority, the Fisheries Commission, and the Ghana National Canoe Fishermen Council.

Community and county government engagement – Kenya

There were minimal community, county and national engagements in 2020 due to COVID-19 restrictions and the reduction in operations. Tullow supported the messaging and raising public awareness on COVID-19 through support provided to Turkana South Emergency Response Committee.

The Early Oil Pilot Scheme ended in June 2020, following the end of the two-year contract period and achievement of set objectives. Engagements in the field were around management of expectations and ensuring existing commitments made to the community were fulfilled and a plan in place to close them out. This included completion of the Lokori health centre that was subsequently used by Turkana county as a COVID-19 isolation centre.



Stakeholder engagement – Suriname We conducted an Environmental and Social Impact Assessment (ESIA) ahead of plans to drill an exploration well in 2021 in Suriname. In 2020, we held a public consultation to present the findings of the Draft ESIA Report, and answer any questions raised during the course of the meeting.

Some of the questions raised and addressed included waste management, lessons learned from similar drilling operations taking place in Guyana and how local content would be implemented during the exploration activities and afterwards if oil is found. The predicted social impacts of non-routine events during the drilling operations and further details on the mitigation measures proposed to protect marine mammals and sea turtles were also discussed. The engagement reinforced the importance of not only mitigating impacts but also ensuring that we help create conditions where local suppliers can also participate in our supply chain.



"We take our environmental responsibilities seriously and make sure that we have consultations with a wide range of stakeholders and communities in Suriname during our ESIA process. We have open door presentations and discussions with the general public and diverse stakeholder groups to ensure they understand what we are doing, how we plan to do it and what safeguards we are putting in place to prevent damage to the environment. The key to our success is ensuring we operate in a safe manner and sustainable way that takes everyone's concerns into account and delivers real value for Suriname through work, training and development opportunities open to everyone"

Richard Donnellan Country Representative, Suriname

Optimising local content

We continue to work to support long-term capacity and growth and expand the participation of local suppliers in the our business and the local economy. The following case study shows how this has happened over the years, and this requires a concerted partnering approach between government and private sector to achieve success in optimising local content.

In 2020, Tullow's spend with all categories of suppliers in all areas of operations reduced by ~30 per cent due to a curtailment in activities as a result of significantly lower oil prices. Ghana's overall local supplier spend was ~50 per cent less in 2020 than in 2019 as key activities such as drilling were suspended. and other work programmes deferred or cancelled. In Kenya, Tullow's 2020 spend with local suppliers was also ~ 50 per cent lower than in 2019, again as a result of a significant reduction in activity. Despite such reductions in spend Tullow continued to support and champion local suppliers, with notable successes in the Ghana logistics and marine sectors.

Orsam Oil & Gas

Since the industry's inception in Ghana, Tullow has invested in capacity development to ensure Ghanaians can achieve the international standards required by the industry in order to win business. In 2010, Tullow awarded the fabrication of its well jumpers to Orsam Oil & Gas and the company continues to deliver services to Tullow today, providing over 80 well jumpers for both Jubilee and TEN fields to date, and is now one of the leading industrial, energy and environmental service companies in Ghana.

Orsam has since grown its list of services as it identified new opportunities and now offers steel construction, piping works and installations onshore and offshore, mechanical and equipment erection, engineering procurement and construction management, tank construction, electrical and instrumentation design, installation services and industrial cleaning.

Currently Orsam employs ~50 highly skilled artisans to deliver the Tullow contract. To maintain its competitive edge, Orsam invests in staff training and it has so far spent over >\$500,000 on equipping employees with world-class training. Over the years, Orsam has been able to train thousands of local staff in the areas of welding, fabrication, coating, project management, human resource management, health, safety and environment and quality assurance/control to name a few.

"There are many levels of logistics and coordination that go into making our service to Tullow a success. To avoid delays to schedules, we put in place contingency plans to mobilise back-up service in the shortest amount of time."

Mr. Kofi Nyame-Mensah Business Development Manager - Orsam Oil & Gas Ltd



Skills and enterprise development

Continued investment in education from kindergarten to vocational level and entrepreneurship

We support socio-economic investment initiatives focused on STEM education and in 2020 continued working with our partners to support education during the COVID-19 pandemic.

Continued investment in early childhood education with Sabre Trust

COVID-19 disrupted the education of over 1million kindergarten children in Ghana. We continued to support the construction of two new kindergarten schools. This project impacts many stakeholders including:

- 320 pupils in four kindergarten schools previously built by Tullow who have been taught using the active play-based pedagogy to help them acquire 21st century skills i.e. communication, collaboration, curiosity, concentration and confidence from an early age;
- 5 Ghana Education Service officers trained on active play-based pedagogy in two districts; and
- 2 headteachers from two schools trained on the active play-based approach to kindergarten instruction and are now better placed to supervise teachers in their various schools.

The broader impact of our partnership with Sabre Trust will continue in Ghana as Sabre Trust has signed an MoU with the Ministry of Education, for the co-design of a National Kindergarten Blueprint which has the potential of being scaled across the country. It is expected that, Sabre Trust's work in the area of improving the learning environment will be captured in this piece of work.





Tullow STEM Radio Schools educating during the pandemic with Youth Bridge Foundation

Tullow and Youth Bridge Foundation in Ghana adapted the ongoing Educate to Innovate initiative following the closure of schools due to the COVID-19 pandemic, helping to bridge the digital learning divide for rural students, and inspiring and sustaining interest through Tullow STEM Radio School. The Radio Schools complemented the Government's efforts in ensuring that learning continued during the pandemic.

Teaching and learning were done through three community radio stations with wide coverage in the Western Region. Teachers from Ghana Education Services (GES) and local community teachers were trained on radio teaching. Tullow STEM radio shows for junior and senior high school students included:

- lessons from the existing school syllabus and curriculum, including science lessons supported by practical home experiments;
- mentoring sessions where tertiary students mentored students at secondary and basic level on all three radio stations;
- assignments given to students which were then submitted through direct calling on air or through dedicated hotlines after the sessions;and
- inclusion of students ardent listeners/ regular callers to be part of in-studio classes and promote peer-to-peer learning.

Acknowledgments on the local radio stations of students, parents and some teachers on air with live mentions were also key in getting the support and engagement of the parents who played a critical role in facilitating home learning and allowing students to use their mobile phones.

With over 2500 beneficiaries (regular callers and listeners), the initiative has and continues to impact various key stakeholders; Students, Parents and Teachers - Ghana Education Service.

Tullow STEM Radio School has provided students with uninterrupted learning when schools closed and youth have also gained opportunities for growth and development bridging the digital learning divide.

Skills and enterprise development

Continued investment in education from kindergarten to vocational level and entrepreneurship



Supporting secondary education Senior High School

We made good progress in delivering our commitment to the Government of Ghana's free Senior High School programme. Construction of the first three sets of dormitories at Nsein, Sankor and Nsutaman schools are substantially complete.

Supporting access to top tertiary level institutions with African Science Academy

We have continued to partner with African Gifted Foundation to support the provision of world-class STEM education by the African Science Academy to brilliant, academically gifted young women from disadvantaged backgrounds from across Africa.



Skills and enterprise development

Continued investment in education from kindergarten to vocational level and entrepreneurship



Youth Bridge Foundation Science, Technology, Engineering and Mathematics (STEM) Clubs

Improving performance of students in Science and Mathematics at Primary school – Basic Education Certificate Examination and West African Secondar Certificate Examination.



Foundational skills literacy and numeracy with Sabre Trust

Provision of 12 Kindergarten facilities, teaching resources and teacher training.

- Safe learning environments for children.
- Students more agile in class at primary level



African Science Academy (ASA) STEM centre of excellence

Supporting a world class centre of excellence in STEM for African Women.

- 10 African countries represented at ASA
- 100 gifted women educated at ASA
- 20,000 schoolchildren beneficiaries of ASA's Teacher Maths Master Class across Ghana
- £4.5million value of university scholarships unlocked for ASA Students
- 100 per cent of students had A* C results in Cambridge Mathematics and Physics (2020)



STEM scholarships: Kwame Nkrumah University of Science and Technology and University of Ghana Legon

- STEM scholarships: Kwame Nkrumah University of Science and Technology and University of Ghana Legon
- 1st cohort in 2018/19 awarded 50 full and partial scholarships
- An estimated125 students to benefit over the next 4 years

Ashesi University; Engineering scholarships & internships

Educating ethical entrepreneurial African leaders.

Skills and Enterprise Development

Continued investment in education from kindergarten to vocational level and entrepreneurship



STEM Graduate Employability (Ghana)

- Field Ready, Jubilee Technical Training College, University of Ghana and UMAT hosting training of STEM graduates.
- 2019: 30 graduated trained and placed
- 2020: 20 Graduates
- 100 employable Ghanaian STEM technicians and operators by 2021



Competency Based Education Training (Kenya)

- Tullow with KCB Foundation sponsored 385 students in technical crafts training – masonry, welding, plumbing, electrical.
- Cohort 2019: Trained at Kenya Water Institute (KEWI), East Africa Welding Institute, Eastlands College of Technology and St. Kizito Vocational Training Institute.
- 2020/2021: Starter kit distribution and business development support for trained graduates.



Enterprise development (Kenya)

- 2017-2019 TechnoServe provided capacity building to MSMEs in Turkana
- 336 micro SMEs completed business skills training



Basic Employability Skills Training (Kenya)

- 2018/2019 Tullow, GIZ, CAP-YEI 2 year program on Work Readiness, Basic Employability and Functional Literacy.



Invest in Africa (IIA) creating access to markets, skills and finance for Africa SMEs (Ghana and Kenya)

Enterprise development

Invest in Africa

2020 was a critical year for our partnership with IIA. Our grant investments into Invest in Africa since 2012 ended at the end of 2020. Invest In Africa will transition from being grantee to a Tullow service provider in Ghana in 2021.

2020 was also a successful year for IIA as they pivoted their offering during the pandemic to provide disaster risk resilience training for SMEs.

IIA fast facts 2020

- 45,000 jobs supported.
- \$252M worth of tenders won by SMEs on the APP.
- 1,550 new suppliers joined the APP.
- \$10M in funding made available to Ghanaian SMEs (cumulative)
- 1,224 women and youth-led Businesses
- 6,500 SMEs accessed the COVID-19 survival toolkit.

Environmental stewardship

Tullow is committed to acting as a responsible steward of the environment and ensuring robust systems are in place for assessing and managing environmental risk.

We subscribe to the precautionary principle established in the Rio Declaration on Environment and Development in 1992 and promote sustainable development through our operations. Our Ghana operations are certified to ISO 14001 Environmental Management System, ensuring that the systems and processes which we apply to our key operating asset are consistently maintained. We aim to comply with all environmental laws and regulations in all the countries in which we operate. As an oil and gas company, our major impacts are the greenhouse gas (GHG) emissions we emit that contribute to global warming and the direct impact in our areas of operations. We regularly disclose our actions and performance in these areas. Additionally, we aim to minimise our impacts relating to water and waste as well as any unplanned releases or spills to the environment.

Climate resilience

TCFD TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

Task Force on Climaterelated Financial Disclosures

Tullow is reporting for a second consecutive year in alignment with TCFD, reflecting the Company's recognition of the threat posed by climate change and the need to reduce global greenhouse gas (GHG) emissions. As stated in its Climate Policy, Tullow supports the goals of Article 2 of the Paris Agreement, "holding the increase in the global average temperature to well below 2°C and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels". We also recognise that meeting the goals of Article 2 of the Paris Agreement requires global carbon emissions to peak as soon as possible and then to decline to reach net zero in the next 30–50 years.

This section discloses our asset-level climate change scenario analysis, conducted to assess the resilience of our portfolio against future climate change scenarios. Tullow uses the two scenarios published by the International Energy Agency (IEA) – the Stated Policy Scenario, which assumes the climate policies and targets announced by governments (prior to 2018) are enacted, consistent with a temperature rise of at least 2.7°C and the Sustainable Development Scenario, in which the world succeeds in the internationally recognized goal of meeting the Paris agreement to limit global warming to below 2°C.

Our current portfolio is resilient under both scenarios. The COVID-19 pandemic impacted the demand for oil and hence oil prices, forcing all oil companies to lower their corporate price decks in 2020, bringing Tullow's long-term view closer in line with that of the Sustainable Development Scenario. All our current projects and assets have a positive economic value, including under the Sustainable Development Scenario. This demonstrates a resilient portfolio that we expect will continue to provide profitable barrels through to at least 2040. Farming down our Uganda asset and reducing our exposure to frontier oil exploration assets has further strengthened our portfolio since this analysis was last undertaken in 2019.

Oil and gas continue to both underpin much of how our world runs today and continue to bring significant wealth and social and economic development to oil exporting countries. At Tullow we believe that oil and gas will play an essential role in the global energy mix for the longterm, even if oil demand peaks in the coming decades. While recognising the energy transition is underway and that a number of companies have started their journey to move away from hydrocarbons, at Tullow, we believe that host governments around the world will continue to greatly value the capability, connectivity and capital that IOCs provide. Therefore, our focus for the foreseeable future will be oil and gas. Tullow plans to invest billions of dollars over the next 10 years, generating significant revenues for our host countries, creating local business opportunities, helping to reduce our carbon footprint and build a compelling proposition for investors and a great place to work for employees. Nevertheless, the decarbonisation of the global economy presents oil exploration and production companies with fundamental new challenges, which our TCFD disclosure addresses.

For more information on our TCFD disclosures, go to our Climate Risk & Resilience Report.



Insights from TCFD scenario analysis

Tullow tests the resilience of its portfolio against two IEA scenarios: the Stated Policies Scenario and the Sustainable Development Scenario. These include both the projected oil and carbon price. Tullow's uses the long-term oil price of \$60/bbl real but also tests the robustness of our portfolio against \$55/bbl nominal. The Sustainable Development Scenario (SDS) – aligned to the Paris goals - projects a modest decline in prices to \$57/ bbl real by 2025 and to \$53/bbl real by 2040, hence the limited negative impact on the Net Present Value in this scenario. While the majority of prospects in Tullow's portfolio remain commercially robust at \$55/bbl, the further the presumed First Oil dates are into the future, the more the NPV is impacted. In the Stated Policies scenario, Tullow's portfolio is positively impacted. Tullow intends to mature its scenario analysis in 2021 to account for additional transition risks.

NPV of portfolio*	Stated Policies Scenario(SPS) ¹	Sustainable Development Scenario (SDS)²
Ghana	•	٠
Non-op	•	•
Kenya	•	٠
Exploration	•	•

* Tullow uses the long term oil price of \$60/bbl real but also tests our investments and Business Plan at \$55/bbl nominal.

1. SPS projected 2040 oil price is \$85/bbl - real.

2. SDS projected 2040 oil price is \$53/bbl - real.



Carbon emissions performance

Tullow supports the goals of Article 2 of the Paris Agreement, "holding the increase in the global average temperature to well below 2°C and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels" and formalised this support in our Climate Policy published in April 2020. We also recognise that meeting the goals of Article 2 of the Paris Agreement requires global carbon emissions to peak as soon as possible and then to decline to reach net zero in the next 30-50 years. To underline this commitment, Tullow has commitment to achieving Net Zero by 2030 (Scope 1 & 2), with an interim target to eliminate routine flaring by 2025.

Despite this long-term commitment, Tullow's operational carbon emissions increased significantly in 2020. Tullow's Scope 1 emissions in 2020 were 2.03 million tonnes of CO, e (2019: 1.26 million tonnes CO, e) a 61 per cent increase on 2019 due to elevated levels of flaring, required for better reservoir management and sustained production levels. For a full explanation and the history behind our elevated flaring levels, go to our Climate Risk & Resilience report. As a result of increased flaring, emissions intensity relative to production grew from 134 tonnes of CO₂ / thousand tonnes of hydrocarbon produced in 2019 to 220 tonnes of CO₂ per thousand tonnes of hydrocarbon produced in 2020. The carbon intensity expressed as kg CO, e/boe is 17 kg CO, e/boe in 2019 and 29 kg CO, e/boe in 2020.

In 2020, Tullow formed a Net Zero Taskforce to define an energy transition strategy for Tullow to achieve net zero emissions (scope 1 and 2). The Net Zero Taskforce in conjunction with an external expert consultant, evaluated several options to decarbonize our Ghana operations. Full details on the approach and methodology taken can be found in our Sustainability Report. Given Tullow's most material source of Scope 1 emissions is flaring produced gas to sustain oil production, the elimination of routine flaring is a key objective of the Net Zero plan and Ghana business. Over the next five years, this will be achieved by managing the business' current dependency on the need for routine flaring, namely, debottle-necking of gas systems on Jubilee and TEN and achieving increased gas offtake from the Government of Ghana. Investments are being made over the next three years to increase the gas handling capacity on Jubilee and enable process modifications on TEN.

Key to eliminating the need for routine flaring is maintaining the consistency of gas supply from Jubilee and TEN fields and the corresponding offtake from the Government of Ghana . At the end of 2020, Tullow was exporting ~135 mmscf/d to shore, consistent with the Government of Ghana offtake nomination. This will need to be maintained to utilise the gas being produced from the higher number of producer wells as part of Tullow's 10-year plan. For 2021, our target is achieve an offtake level between 100-135 mmscf/d as an optimum level to support oil production. There is strong alignment and a robust commercial foundation between the JV Partners and the Government of Ghana to achieve the targeted levels.

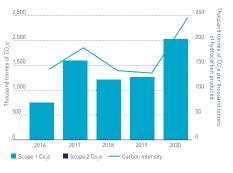
Tullow and its JV partners are actively discussing a long-term firm gas supply and offtake agreement with the Government of Ghana which is anticipated to create material value to all parties involved and which underpins the projected outlook for the 10-year business plan.

These decarbonisation efforts will set Tullow on a path to reduce emissions on a net equity basis by ~40 per cent by 2025 relative to 2020 levels. Further identified emissions reductions initiatives can reduce emissions by an additional 5 per cent.

To offset its residual hard to abate carbon emissions, work is underway to identify nature based carbon removal projects, such as, reforestation, afforestation and conservation that Tullow will invest in to achieve its Net Zero ambition by 2030.

We will also seek to align our carbon offset strategy with government priorities, emerging regulation on Article 6 of the Paris Agreement as well as our Shared Prosperity strategy, focused on creating socioeconomic opportunities for our host communities.

Total Gross operated CO₂e emissions and carbon intensity for Scope 1 & 2



Carbon accounting

Tullow has begun reporting for the first time emissions from our Non-operated portfolio across our assets in Gabon, Equatorial Guinea and Cote d'Ivoire. The equity share of emissions from these assets in 2020 was 318,271 CO.e. This is separate and in addition to the Scope 1 and 2 emissions described earlier. As a result. Tullow's indirect emissions associated with our value chain, or Scope 3 GHG emissions, increased significantly. However, given our primary area of control and influence is our operated emissions, this is where our decarbonisation efforts will continue to focus in collaboration with our Joint Venture Partners.

Targeting Net Zero by 2030 (Scope 1 & 2) Pathway to carbon neutrality 2025 _____ 2030 Jubilee gas de-bottlenecking to eliminate 2020 emissions **Carbon reduction initiatives** routine flaring NPV+ projects baseline TEN process modifications to eliminate Nature based routine flaring carbon hard to abate



* net equity emissions

Waste Management



"Tullow's Plastic Waste Action wasn't just a typical environmental campaign. It was a shift from thinking about environment as a compliance issue to ensuring sustainability is at the heart of what we do. We delved deeper into innovative and creative solutions towards giving plastic a new sense of value - not just throwing it away after single use. While we recognise that recycling is not enough and we can't recycle our way out of plastic pollution it is a good place to start. Beyond this we will intentionally do more to reduce our plastic consumption across our sites. Every bit makes a difference to clean up the environment."

Laureen Darku Environment and Asset Protection Manager



Fugitive emissions

Fugitive emissions are accidental, diffusive or unproductive emissions covering a vast number of sources including leaking pipework, valves and flanges. In 2020, Tullow worked to mature its understanding of fugitive emissions from leaks, seeps and weeps from piping and valves and venting from tank tops on our FPSOs.

Tullow has been using infra-red cameras to detect and fix (with wraps) fugitive emissions leaks from piping and valves in line with the Best Available Techniques (BAT). Going forward, we intend to procure instruments to measure the concentration of and gas composition in the immediate vicinity of the leak and then apply the appropriate emission factors to each leak found. Additionally, we evaluated fugitive emission from vent gas from tank tops on the FPSOs which are filled with hydrocarbons in the transportation process. We evaluated the composition of gases within the vent gas to determine the best approach to mitigating them. Previously, the company assumed that 100per cent of vent gas was composed of methane, but on closer inspection the gas was made up of propane, butane, nitrogen and other gases which have an indirect and uncertain effect on global warming. due to their short lifetimes and the nonlinear chemistry involved in ozone and OH chemistry.

Following an analysis of the gas composition, the methane composition was found to be only 1.2per cent. Tullow will be restating its methane emissions from 2015-2020 based on these findings.

Reducing and recycling plastic waste

Tullow Ghana generates ~30 tonnes of plastic a year from its offshore platforms and onshore support base and offices. In recognition that plastic pollution, alongside climate change and biodiversity loss, is one of the biggest global environmental challenges of our time, Tullow Ghana has worked to find ways to reduce its use of single use plastic and increase the amount of plastic recycling.

Over the past three years Tullow Ghana has eliminated use of plastic water bottles, disposable plastic cups and plastic spoons in its Accra and Takoradi offices. This resulted in an over 50per cent reduction in plastic waste generated from these facilities. Tullow Ghana is working with waste contractor Zoil Ltd, which grinds plastic waste from offshore platforms and Takoradi offices into pellets and transports to a third-party for use in the manufacture of pavement blocks. Plastic Waste from Tullow's Accra office taken by McKingtorch Creatives, which uses the recycled plastic for manufacturing slippers and sanitizer containers, among other creative uses.

Further efforts were made in 2020 to manage and account for single-use plastic waste generated from Tullow sites, with a particular focus on our FPSOs. However, this proved challenging due to operational constraints and employee health and hygiene concerns during the pandemic.

Waste Management in Suriname

In preparation for the drilling of the GVN-1 exploration well in Block 47 offshore Suriname, Tullow's waste management plan has been developed and issued to meet the commitments and mitigation measures proposed in the Environmental and Social Impact Assessment (ESIA) and associated Environmental and Social Management Plan (ESMP), approved by the National Institute for Environment and Development in Suriname (NIMOS)*, and follows the principal of Best Practicable Environmental Option (BPEO).

The plan provides waste management strategies for the safe and environmentally sound management and treatment of wastes generated during the project. The different types of waste that may be generated will be identified, categorised and reported before being disposed of or treated in an environmentally sound way.

Activities ranging from the Mobile Offshore Drilling Unit based operations, logistics and transport activities, and the supply bases in Suriname and Trinidad are covered by the waste management plan. Hazardous and non-hazardous wastes, including liquid and solids generated from these activities will be managed, with the exception of treated black, grey and bilge water, macerated food waste and treated drill cuttings which are discharged to sea in line with the International Convention for the Prevention of Pollution from Ships (MARPOL) guidance. During our stakeholder engagement, guestions that were raised and addressed included waste management, lessons learned from similar drilling operations taking place in Guyana and how local content would be implemented during the exploration activities and afterwards if oil is found. The predicted social impacts of nonroutine events during the drilling operations and further details on the mitigation measures proposed to protect marine mammals and sea turtles were also discussed. The engagement reinforced the importance in not only mitigating impacts but also ensuring that we help create conditions where local suppliers can also participate in our supply chain.

As a result of executing the waste management plan, any hazardous waste will be sent for treatment to a licenced, approved Waste Management Contractor in Suriname. No hazardous waste will be exported from Suriname. Non-hazardous waste will be treated or disposed of in Suriname, or in Trinidad via the logistics contractor. Opportunities for waste minimisation, re-use and recycling will be identified and assessed. The appointed Waste Management Contractor has been audited by Tullow to ensure conformance with its own Management Systems and local legislative requirements.

Energy efficiency



Solar Panels on the new Takoradi office

Tullow's most material source of carbon emissions is flared gas from its FPSO operations. Notwithstanding this fact, Tullow is continually evaluating all opportunities to save costs, make our energy supply more efficient and reduce our carbon footprint. With this in mind, solar panels were installed on the roof of the new office in the Takoradi Shore base in 2020. Power savings of 35-40 per cent have been generated since their installation. The Office Services team will continue to assess opportunities to expand solar generated power for the remaining Takoradi and Accra offices in order to achieve further energy and carbon savings.

"Power savings of 35-40 per cent have been generated since their installation. The Office Services team will continue to assess opportunities to expand solar generated power for the remaining Takoradi and Accra offices in order to achieve further energy and carbon savings."

Saviour Kwaku Adzika Facilities & Admin Supervisor (Takoradi)



Equality and transparency

Equality and transparency are central to the way we operate and to helping us to earn the trust of all those with whom we interact. We have strong corporate governance practices and disclose our payments transparently. We are committed to comply with laws and regulations and, wherever we do business, maintain ethical conduct, uphold human rights and maintain strong community relationships.



Governance, compliance and ethical conduct

Ethical behaviour

Our Code of Ethical Conduct governs the way we work and coveys a clear message to all staff and stakeholders about how we commit to compliance with laws and regulations, as well as our ethical standards. The code of conduct is clear on our zero tolerance for bribery, corruption and other forms of financial crime and this position is strongly reinforced by Tullow's Management and Board. The Code also covers our position and controls with regards to human rights, lobbying and advocacy, prevention of the facilitation of tax evasion, anti-slavery and GDPR.

We require those who deliver services to us, or who act on our behalf, to abide by the Code and meet the requirements of specific business ethics and compliance clauses in their contracts. This ensures that third parties do not cause us to breach our own Code. Prior to awarding contracts, we conduct risk-based third-party due diligence to assess risks related to ownership structure, anti-briberv and corruption, sanctions, trade restrictions, human rights and labour conditions. In 2020, we digitized our due diligence processes and implemented a workflow management process to allow for third parties to be screened automatically against sanctions and trade restrictions lists, and for red flags to be escalated in real time for review by our internal Ethics & Compliance resource.

This process improvement further ensures that due diligence is performed effectively and efficiently.

During 2020, we relaunched the annual eLearning on the Code to all staff. This focused on raising awareness of key issues such as anti-bribery and corruption, anti-tax evasion, due diligence, human rights, diversity and inclusion, and the importance of employee wellbeing. In addition, all staff are required to submit an annual Code Certification which is a disclosure on how they have complied with the code of conduct in the preceding period. We achieved over 99per cent completion of this process in 2020 and the remaining followed up in January 2021.

In 2020, we recorded 52 speaking up cases, including four submitted via our confidential speaking up line, Safecall. We investigated all reported possible or actual breaches of the Code and, in 2020, two people left the Group or had their contracts terminated.

Speaking up cases 2020



Transparency and disclosure of payments:

Tullow believes that public disclosure about our business and actions serves a broader agenda of openness to dialogue and builds accountability, credibility and trust. Transparency regarding payments to governments is an important way to promote honesty in our industry, mitigate corruption and support inclusive development.

Supporting transparency in the extractives industry Tullow has been a corporate supporter of the Extractive Industries Transparency Initiative (EITI) since 2011, and we play an active role in the development of new programmes and initiatives. We support national EITI membership in the regions in which we operate and are keen to take an active role in supporting the national application process, which can take two years or more to complete. Tullow continues to publish Production Sharing Agreements (PSAs), with the agreement of our government partners. In 2020, proactive activity was limited by the global Coronavirus pandemic however Tullow was able to contribute to discussions with EITI around transparency in supply chains and how to manage conflicts of interest. Tullow also engaged with Oxfam on reports into oil & gas taxation in East Africa.

CODE OF ETHICAL CONDUCT

the way we work



Human Rights

- Tullow's Human Rights policy sets out our intent to manage human rights risks through implementation of both the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights (VPSHR), and to respect fundamental labour rights and international labour standards, as set out in the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- To achieve these goals, we commit to identifying and addressing human rights risks upon entering a new country or region, and on an ongoing basis, and conduct human rights due diligence before significant investments.
- The commitments set forth in the Policy are operationalised through the following policies, standards and procedures:
- 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. The Code also sets out our commitment to conducting due diligence on our suppliers with respect to risks related to human rights and labour conditions. All suppliers are required to perform

their work in a manner consistent with the Code and their performance is subject to ad-hoc audit.

- Safe and Sustainable Operations Policy: we commit to designing, building and maintaining safe working conditions and take responsibility for the health and wellbeing at work of our staff and contractors.
- Contracts & Procurement Standard: sets out minimum requirements for contracts for goods, works and services.
- Group Supplier Due Diligence procedure: sets out due diligence requirements in respect of human rights and labour conditions. In 2018, Tullow updated its standard form procurement contract templates to include specific references to compliance with applicable antislavery and human trafficking laws.
- Non-Technical Risk Standard, which includes mandatory requirements for the identification, assessment, mitigation and management of social impacts and risks, including the rights of impacted groups.

For more information on how Tullow upholds Human Rights within our business and Supply Chain, please go to our ESG page online.

2020 total socio-economic contribution

Transparency and disclosure of payments Tullow believes that public disclosure about our business and actions serves a broader agenda of openness to dialogue and builds accountability, credibility and trust. Transparency regarding payments to governments is an important way to promote honesty in our industry, mitigate corruption and support inclusive development. Tullow has been a corporate supporter of the Extractive Industries Transparency Initiative (EITI) since 2011, and we remain committed to promoting transparent disclosure of payments to government.

Our payments to governments, including payments in kind, amounted to \$375 million in 2020 (2019: \$413 million). Total payments to all major stakeholder groups including suppliers and communities, as well as governments, brought our total socioeconomic contribution to \$542 million (2019: \$719 million). In addition to payments to governments, this included \$162 million spent with local suppliers, and \$4.7 million in discretionary spend on social projects. Our total payments made to the Ghanaian Government in 2020 amounted to \$180 million (2019: \$270 million).

Our people

Resetting our business and making Tullow a compelling place to work

2020 was a year of change for Tullow and its people. We fundamentally reset and downsized our business and directed our focus to managing those impacted respectfully and fairly. In parallel, we designed and implemented changes to our Employee Value proposition to make Tullow a compelling place to work and to empower and incentivise employees to focus on the regeneration of our business.

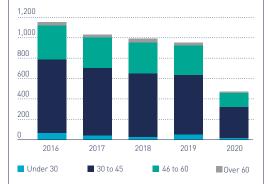
Our People

Supporting our people through change

Tullow undertook significant restructuring of its organisation in 2020, with a reduction of 53 per cent in employee headcount and the closure of the Cape Town and Dublin offices. Tullow ensured that throughout this process people were treated fairly and with respect and that the changes were well communicated. In all locations. local legislative requirements were followed to ensure the legal notification requirements were met. Where appropriate, suitable notice periods were provided, and representative bodies were consulted. The process used objective and appropriate selection criteria for redundancies and ensured no discrimination via the selection process on the basis of gender, race, age or the raising of past concerns. In all markets, Tullow's severance payments exceeded statutory minimums and in all locations employees were provided with access to support and counselling via employee assistance and career transition programmes.

As required, we also made available internal Occupational Health services. During this reorganisation, we have redeployed staff to other roles where possible in order to avoid redundancy.

Total workforce by age



Employee Value Proposition (EVP)

In Q4 of 2020, Tullow refreshed its EVP to ensure the company has a compelling proposition for its staff and to make clear what Tullow expects from its employees by way of upholding the company values and work ethic. Tullow's EVP is comprised of an offering described in the graphic above.

Compensation

Tullow continues to pay its staff at competitive market rates. From 2021, the calculation of our staff bonuses will be based on the company performance with the individual contribution recognised to reward our top performers. Shares will also be awarded to retain and incentivise high performers. Our drive to create a performance culture, whereby top performers are recognised



and rewarded, will be underpinned by a continuous feedback process between employee and managers and supported by a 5 scale performance rating system.

Benefits

Additional benefits have been introduced to provide staff with more work/life flexibility, recognition that is in the moment and to support a work environment, which is inclusive and diverse. These include; the ability for employees to buy and sell up to five days annual leave; enhanced paternity leave available across all locations.

All employees receive private medical insurance for themselves and their dependents.

Culture

Tullow is making changes to its ways of work to become more performance focused, empowering our people to deliver and be valued for their contribution. Our staff are encouraged to strive for continuous improvement and our Senior Leadership set an open, transparent and inclusive culture.

Professional Development

Tullow's professional development focuses on 'on the job' performance and development and is supported by broader roles that many within the organisation have taken on since the restructuring, as well as lateral moves. People's professional development is further supported by the continuous performance management process, where live feedback is encouraged continuously. A Development Focus Group will leverage existing internal resources and skills that can be harnessed to develop our people and address skills gaps and a mentorship programme will also be available to those wishing to benefit.

Tullow

We are stronger as one team

Do the right thing

- Keep each other, stakeholders,
- the public and the environment safe
- Be honest, respectful & transparent
- Comply with all relevant rules, regulations and policies

Take responsibility

- 'Can do' attitude and accountable for actions
- Be considered and effective in decision making
- Continuously improve

Collaborate

- Listen to, support and trust each other
- Constructively challenge
- Share knowledge & best practices

Make it count

- Focus on what's important
- Take pride in what you do
- Have fun

Tullow's refreshed values Smart Working & working environment

As the Company adapted to remote working through the pandemic, Tullow was able to leverage its Smart Working approach ensuring that throughout the pandemic our people have remained productive and through our Wellness initiatives ensured our people were supported. As a Company, through this period we have seen the value of a workplace that has embraced flexibility. placed value on work/life balance and promoted employee wellness. Going forward, even beyond pandemic restrictions, our Smart Working approach will continue and employees will be given flexibility with few parameters to manage their work to meet their own work/life balance requirements.

Inclusion & Diversity

Inclusion and Diversity (I&D) are key components of Tullow's DNA. We maintain a culture where everyone is valued and treated with dignity and respect. We do this by:

- Developing and retaining diverse talent at all levels within our organisation
- Challenging incorrect behaviour, removing barriers and creating equal opportunities for our employees, and seeking to learn and understand complex I&D issues
- Maintaining zero-tolerance to all forms of prejudice and discrimination and actively fostering an environment where Speaking Up is encouraged
- Working together to embrace all aspects of diversity, recognising that collectively leveraging our individually diverse backgrounds and experiences will make us a more successful organisation.

In 2020, Tullow held a companywide discussion in the wake of George Floyd's death and momentum around the BlackLivesMatter movement to discuss racism inside and outside of the company and what could be done to stamp it out. Rahul Dhir also hosted Tom Ilube, CBE. Tech entrepreneur and Britain's most influential black person at a separate employee townhall to talk about black leadership and Tullow's partnership with his non-profit venture African Science Academy. Events to aim at raising awareness of Inclusion & Diversity issues are continuing through 2021. In January, Tullow Board members Dorothy Thompson, Genevieve Sangudi, Sheila Khama and Rahul Dhir, shared their experiences of discrimination and how they have overcome discrimination and bias during their careers. In March, a law firm and partner of Tullow will host a companywide conversation on unconscious bias.



"Female representation in Tullow's Finance organisation at senior management levels (46 per cent) is well over the average female senior management representation in Tullow overall (20 per cent). That achievement is thanks to strong leadership on gender diversity by Tullow's CFO, Group Financial Controller and Group Treasurer. The Finance leadership are now working to ensure we have succession plans that include a good representation of the female talent we have across the finance organisation"

Dionne DeGovia, Group Financial Reporting Manager

Women in Finance Charter

Tullow is a signatory to the Women in Finance Charter which demonstrates our ongoing commitment to improving the diversity of our workforce, particularly improving women's representation at senior levels within our Finance function. Our target was to achieve 40 per cent female representation in senior management roles within Finance by 2021. In 2020, Tullow's female representation in the finance team was 46 per cent within senior management roles. We achieved early completion of the target through:

- 1. Reviewing our data to identify key talent and progression opportunities/succession plans and review team development plans in line with required progression to target
- 2. Updated our approach to recruitment to encourage diversity, first by identifying key competencies for roles to determine assessment criteria for candidate selection and secondly by ensuring we have diverse long and short lists
- 3. Changing behaviour and Culture within the team by promoting flexible working and demonstrating evidence of Tullow gender neutral HR policies.

In the context of a smaller organisation, Tullow will review appropriate gender targets within the Finance team.

Dependent care and special leave

In the UK Tullow runs the Childcare Voucher Scheme and promotes the Tax Free Childcare scheme. In Ghana, we provide education support to all levels of employee. Additionally, we have sabbatical leave procedures and other leave procedures to support our employees in spending time of with dependents. In many locations enhanced maternity pay allows for more paid time off for new mothers More recently, as part of our new EVP, we have committed to provide enhanced paid paternity leave to all new fathers in all locations.

Gender pay

We continue to report on the gender pay gap in the UK as required by law, showing a gap of 43 per cent at median rates in 2019, which is an improvement of 3 per cent on our result in 2018. We face an ongoing challenge to recruit and promote qualified and experienced women in technical roles in the oil and gas sector, and this has resulted in a higher proportion of men in senior roles. For our full 2019 Gender Pay Gap Report, go to our website.

Gender diversity	2018	2017	2020
Board diversity	13%	37.5%	33%
	(1/8)	(3/8)	(3/9)
Leadership diversity	25%	25%	20%
	[2/8]	[1/4]	(1/5)
Senior Management diversity	21%	20%	18%
	(14/68)	(12/61)	(4/22)
Workforce diversity	31%	32%	27 %
	(303/990)	(305/951)	(129/473)

2020 pay and bonus gaps

	Women's hourly rate		Women's bonus pay		
	2019	2020	2019	2020	
Lower (mean)	35%	38%	44%	37 %	
Lower (median)	43%	43%	46%	43%	

2020 pay quartiles

	Men		Women	
	2019	2020	2019	2020
Top quartile	89%	88%	11%	12%
Upper middle quartile	83%	88%	17%	12%
Lower middle quartile	62%	59%	38%	41%
Lower quartile	52%	45%	48%	55%

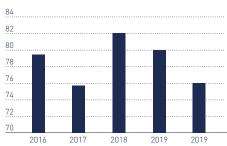
Percentage received bonus pay

	Men		Women		
	2019	2020	2019	2020	
	95%	94 %	96%	96 %	

Localisation

As an oil company based largely in Africa, localisation is fundamental to the way we do business in our host countries, and to helping to build local skills and contribute to improving local livelihoods. Our approach includes: - Hiring local people as a preference wherever possible, while adapting recruitment qualification thresholds to ensure a broad, inclusive pool of potential candidates, development of local staff by expatriates. -Our expatriates are required to support the development of locals to transition into roles previously held by expatriates so that over an agreed period of time we can strive to create a workforce, which is predominantly local. To achieve this we identify and implement development plans for local colleagues and expatriates support their training requirements, in addition to this we provide opportunities for secondments to other Tullow locations or business areas to gain skills and work experience.

% of Local Nationals employed





TEN Offshore Team Lead, Ghana

Eugene joined Tullow in 2013 after a year of National Service with Kosmos, Tullow's JV Partner. Prior to joining Tullow, Eugene also did a master's in petroleum production engineering at Robert Gordon University in Aberdeen. Eugene then joined our Well Engineering Development Programme, as part of this programme he went on International Rotator assignments, first in Ethiopia and then in Uganda before moving to Kenya and then Ghana. Uganda was where Eugene got his first significant career opportunity, when his line manager suggested he worked for a few months as night drilling supervisor for plug and abandonment well. This assignment would normally have gone to a well engineer with many more years of experience than

Eugene, but Eugene proved he was up to the task. After working on the exploration drilling programme in Kenya, Eugene moved back to Ghana, in a Performance Engineer role evaluating the performance management of rig costs and schedules. Eugene was then invited to join an assessment day for an Offshore Field Manager (OFM) Development opportunity, following this he joined an internal programme within the Operations team, which focussed on developing Ghanaian nationals to succeed expat OFM and Offshore Installation Managers.. Moving into operations after two years in Well Engineering took Eugene out of his comfort zone and he was quickly seconded to the Jubilee Operations team as Well Integrity Engineer as well as providing operations support, reporting directly to the Ops Manager. The Jubilee turret failure quickly followed in 2016, and

Eugene was chosen to be part of the team to determine how production operations would be maintained through this critical period for the company. Further competency assessment followed allowing Eugene to rise up the ranks offshore on TEN, with exposure to production operations, maintenance and marine and logistics, offtake, EHS functions including incident investigations as well as assurance and verification activities. More recently, during COVID-19, with a reduced crew on TEN, Eugene had the opportunity to stand in as OFM for full rotation, and based on his performance was recommended for promotion to Offshore Team Lead, which he started last August.

"To have the opportunity to work in three countries in my first few years at Tullow was amazing. It was also a privilege to attend relevant and industry standard courses in Paris, Houston and Aberdeen which augmented my practical on the job experience. I owe a lot of my career progression and my localisation of an expatriate role to great sponsorship and mentorship from managers and colleagues who I learned a lot from and who were helping identify opportunities for me to grow."



Senior Facilities Engineer, Ghana

Bismark Osei Bimpong, Senior Facilities Engineer, has been with Tullow for now almost ten years. Bismark joined after completing a Master's degree in petroleum engineering in Nigeria. He joined as a trainee reservoir engineer in the subsurface team and after one and a half years was promoted to junior reservoir engineer. In total, Bismark spent three years in subsurface. One of the big challenges in those early years was to perform reservoir modelling on his own, which he did for a period of six months in London, to support the technical demonstration of the reserves and resources that underpin our assets for our lending banks at the time. With the

support of the senior reservoir engineer Bismark built his first reservoir model. He then returned to Ghana in 2015 and not long after the company went through a major restructuring and Bismark was selected to be retained by the company but was transitioned to topside engineering team. This was an alien and challenging moment for Bismark, but he soon got into his stride in the new department. Bismark has also had the experience of being an offshore engineer on rotation for one year, which gave him great insight into topside operations. On his return to shore base, Bismark augmented his knowledge of topsides that he had gained with some technical courses. He then started working on engineering projects and in 2017 was seconded to MODEC in Houston to get projects ready for the Jubilee shut down in 2018. There, he gained a lot of brownfield modification know how and project management skills. He received great support from his line manager at the time and was sponsored to undertake a project management professional qualification and time off work each week to complete the course. This broadened his knowledge in the project engineering field. Back in Ghana in 2018 he supported the shutdown brownfield reliability work while the Turret Remediation Project work was ongoing. A big achievement during the shutdown was the scopes

completed around the water injection system which saw the start of reliability improvement of the water injection motors and overall system uptime. Last year he also got the experience of working on unblocking the gas export pipeline. Over the last year, Bismark has also been technical lead on the Net Zero project, defining the decarbonisation pathway in support of its ambition to be carbon neutral by 2030.

"It's really never a dull moment in Tullow. In the years to come, while I still have a lot to learn, I'm targeting either a project management role in the company and engineering management role and I'm optimistic about career growth opportunities within the business."

Employee engagement

The significant organisation restructuring changes implemented in 2020 and increased levels of remote working imposed by COVID-19. meant that Tullow significantly increased the level of internal communications throughout the year. This included detailed written and townhall communications from the Senior Leadership Team helping staff understand what changes were being implemented, the rationale and timings of those changes and how they would impact individual teams. Senior Leadership also initiated a series of Coffee Mornings – small group discussions to ensure staff had ample opportunity to raise concerns or questions, helping them to adapt to the organisational change and stay connected. Tullow also organised a Health & Wellbeing Fortnight, which you can read more about in our on page 14 of this report, providing a series of events and opportunities for staff to prioritise their mental and physical wellbeing. This will be extended into 2021 in a more regular and phased programme, so that staff can help maintain their health and wellbeing.

Policies & Data

Policies:

Climate Policy Human Rights Policy Safe & Sustainable Operations Policy Code of Ethical Conduct

Information about our reporting: Sustainability Data Basis of Reporting GHG Emissions Scope & Calculation Methodology GRI Index EY Independent Assurance Statement

Further reports: Climate Risk & Resilience Report 2020 Payment to government Report



Discover more about Tullow's approach to sustainability tullowoil.com/sustainability/

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designportfolio