

Modern Slavery Act Transparency Statement

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

This Statement is made in respect of the financial year ending 31 December 2022. The Statement outlines the steps we took to address modern slavery risks, including the governance processes and progress we made in our own operations and supply chains.

Introduction

Tullow Oil PLC ('Tullow') and its subsidiaries (together, the 'Group') is committed to meeting the requirements of the Act and 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 organisation and supply chain to the potential risk of instances of modern slavery and human trafficking, including underage, forced or bonded labour. We work to regularly assess the extent of this risk and to take reasonable steps to ensure that modern slavery is not taking place in Tullow's business or supply chain.

About Tullow

Tullow is an independent oil & gas exploration and production company, headquartered in the United Kingdom (UK) and listed on the London and Ghanaian stock exchanges. Our portfolio of over thirty licences spans six countries.

Our Supply Chain

The potential risk of modern slavery affecting a company's supply chain is influenced by the nature of operations being carried out in each country. For Tullow, this activity ranges from exploration activities, undertaking onshore and offshore development projects, production operations, oil marketing through to decommissioning.

We rely on international suppliers, as well as local suppliers in our countries of operation, to deliver key components of our operations, for example seismic and other surveys, drilling and completion, logistics, engineering and construction, operations and maintenance, information technology, communications, and other services. We continue to focus on creating improved access to supply chain opportunities for local suppliers, including direct spending with locally registered international firms and joint ventures between local and international firms.

Given the complexity of our activities, it is important that we have the right management systems in place to ensure that modern slavery and human trafficking do not occur in our supply chain.

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Governance, Policy, and Standards

Tullow is governed by its Board, which approves the company's strategy, determines its key policies, and reviews management and financial performance. The following policies relate to safeguarding against modern slavery risk:

- 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.
- Our **Code of Ethical Conduct** (the 'Code') prohibits the use of underage, forced or bonded labour, and sets out our expectations in respect for fundamental labour rights and freedom from harassment. The Code also sets out our commitment to conducting appropriate risk-based due diligence on our suppliers in respect of risks related to human rights and labour conditions. All suppliers are required to perform their work in a manner consistent with Tullow's Code and their performance is subject to ad-hoc audit and/or inspections
- Our **Safe and Sustainable Operations Policy** sets out the expectation that we will design, build, and maintain safe working conditions and take responsibility for the health and wellbeing at work of our staff and contractors.
- Our **Group Contracts & Procurement Procedure** sets out a framework of principles for the placement of contracts for goods, works and services.

Due Diligence (DD) and Assurance

Operations

Tullow seeks to meet the commitments in its Human Rights Policy by, for example, identifying and assessing the potential for human rights impacts through Environmental and Social Impact Assessments and through implementation of the Voluntary Principles on Security and Human Rights.

Supply Chain

Our Group Supplier Due Diligence (DD) Procedure and Ethics & Compliance Due Diligence (E&C DD) Standard set out procedural requirements for due diligence checks of our suppliers, including due diligence requirements in respect of human rights and labour conditions.

A pilot worker welfare inspection to assess labour conditions was conducted at a supplier site in 2022. We continue to evolve our approach as we learn more about modern slavery risks and recognise that working alongside suppliers to enhance their own due diligence programs is a critical component to understanding and addressing the risks that lie within supply chains. We piloted annual certification from suppliers in Ghana. The certification is via a supplier acknowledgment form which asks suppliers to complete a self-assessment to acknowledge their continued compliance Modern Slavery clauses in their contracts. The answers to these self-assessments will be reviewed for trends or material issues requiring follow up training or investigation. In 2018, Tullow updated its standard form procurement contract templates to include specific references to compliance with applicable anti-slavery and human trafficking laws.

Remediation

Our 'Speak-Up' mechanism is designed to provide Tullow staff, and anyone working for (or on behalf of) Tullow, with a safe and secure method of reporting matters related to their working environment, including where they believe that our Code of Ethical Conduct may have been breached. This includes an independent external reporting mechanism for raising concerns, which provides an opportunity for reporters to remain anonymous, and all reports are investigated. We also have a grievance reporting process designed to resolve instances where our staff feel they have been disadvantaged or treated unfairly in relation to their term and conditions, health, and safety, working environment, bullying and harassment.



Modern Slavery Act Transparency Statement (Continued)

Assessing effectiveness

Tullow monitors the effectiveness of its efforts to combat Modern Slavery through multiple mechanisms, including Tullow's Board, Safety and Sustainability Committee oversight, key performance indicators (KPIs), supplier due diligence processes and audits.

An internal cross-functional Human Rights Working Group (working group), formed in 2022, monitors and manages human rights issues from diverse perspectives. The working group provides us with the opportunity to take a company-wide approach to monitoring the effectiveness of our programs. The working group includes members from legal, supply chain, human resources, environment, health, and safety (EHS), ethics and compliance, internal audit, and sustainability management functions.

The working group standing agenda includes a performance update and a broader review of recent due diligence activities, the effectiveness of our programs and the support being provided to better facilitate the integration of modern slavery controls in our business planning processes. The working group met three times in 2022 with key agenda items including:

- external human rights trends,
- functional updates on due diligence programs and,
- a review of human rights (including modern slavery) performance and gap closure following an internal audit of our modern slavery processes, which identified areas for improvement including the requirement for renewed focus on monitoring and managing modern slavery in our supply chain.

We intended to initiate worker welfare inspections in 2022, however following a pilot inspection, it was apparent that to effectively conduct inspections, training was required for staff as well as suppliers. Consequently, fourteen Tullow staff participated in a pilot online worker welfare training programme developed by the International Petroleum Industry Environmental Conservation Association (IPIECA) and Building Responsibly. The feedback from our colleagues was that the training was informative and especially useful for identifying and addressing worker welfare issues. This training will be rolled out to targeted staff across E&C, supply chain, EHS, social performance and human resources functions, as well as high-risk suppliers and their respective contract holders in 2023.

Training

All Tullow staff are required to complete the Company's annual Code of Ethical Conduct e-learning course, developed to ensure greater awareness of the Code's requirements, and support the application of the Code in our day-to-day activities. In 2022 we achieved 100% completion by staff of the Code e-learning programme.

In addition to this we:

- Piloted worker welfare training modules developed in conjunction with the International Petroleum Industry Environmental Conservation Association (IPIECA).
- Delivered "Introduction to the UN Guiding Principles on Business and Human Rights" training to all Tullow and contracted employees, achieving 100% participation.
- Raised awareness internally on Tullow's policy, responsibilities, and commitments to upholding human rights through a series of intranet articles and ethics and compliance spotlights.
- Completed educational sessions on E&C, which included human rights for local companies in Guyana, with 129 participants from 111 companies participating in 2022.
- Conducted virtual and face to face supplier training sessions in Ghana on E&C, which also included human rights.



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Next steps

We plan to further enhance our approach to monitoring effectiveness through the working group in 2023.

We will invest in a human rights salient issues assessment and develop controls to ensure appropriate allocation of resources. We intend to introduce additional criteria to support identification and assessment of modern slavery risks in relation to our suppliers, which will include country risk, workforce risk and sector risk. This will enable prioritization of due diligence and training of suppliers assessed as being high-risk.

We will continue to emphasise to our staff and suppliers our commitment to ensuring that modern slavery and human trafficking is not part of our supply chain. We have established KPIs to assess our effectiveness in combating Modern Slavery, which include the following metrics:

- Identify Human rights salient issues and develop action plans with a focus on ensuring appropriate allocation of resources.
- Develop criteria to enhance modern slavery risks identification in relation to our suppliers and assess the number of suppliers identified as being high, medium, or low risk to enable prioritisation as part of our ongoing due diligence
- Review and assess the responses from supplier acknowledgement forms for follow up actions.
- Review the number of employees who have completed Code e learning and targeted labour rights training.
- Review and assess the number of Human rights related speak up complaints received, the findings and the resulting actions.

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

Signed by Rahul Dhir, Chief Executive Officer (CEO), on behalf of the Board of Tullow Oil PLC



Rahul Dhir
Chief Executive Officer - Tullow Oil plc
June 2023