Bank of Valletta p.l.c., Malta

Date	Time	Originating Account	Beneficiary account number	Beneficiary Bank	Currency	Amount	Beneficiary Name	PMNT Details	Type of Payment	Ben Address	[illegible]
[illegible]	09:57	40037224201 9 (EUR)	London Branch Cash Movement (Brian Glover)		EUR	500,000.00	Not-available		Other Professional Fees	na	
[illegible]	11:40	40037224201 9 (EUR)	GB36EFGB17800000491740	EFG Private Bank Bank Ltd	EUR	1,500,000.00	East Africa Development Ltd	Invoice 1 dated 03-06-10	Other Professional Fees	[illegible]	
[illegible]	09:40	40037224201 9 (EUR)	GB36EFGB17800000491740	EFG Private Bank Bank Ltd	EUR	1,500,000.00	East Africa Development Ltd	Invoice 2 dated [illegible]	Other Professional Fees	[illegible]	
[illegible]	14:59	40037224201 9 (EUR)	London Branch Cash Movement (Brian Glover)		EUR	500,000.00			Other Professional Fees		
[illegible]	11:03	40037224201 9 (EUR)	GB36EFGB17800000491740	EFG Private Bank Bank Ltd	EUR	3,500,000.00	East Africa Development Ltd	Invoice 3 dated 8-07-10	Other Professional Fees	[illegible]	
12/07/2010	09:08	40037224201 9 (EUR)	GB36EFGB17800000491740	EFG Private Bank Bank Ltd	EUR	5,000,000.00	East Africa Development Ltd	Invoice 4 dated 12-07-10	Other Professional Fees	Nairobi 00611	[illegible]
12/07/2010	08:08	40037224201 9 (EUR)	GB36EFGB17800000491740	EFG Private Bank Bank Ltd	EUR	5,000,000.00	East Africa Development Ltd	Invoice 5 dated 16-07-10	Other Professional Fees	Nairobi 00610	[illegible]
				SUM	EUR	17,500,000.00	*				

Laid on Table by
Hon. Karuhanga Gerald
on 11th Oct. 2011

9

Tullow Oil plc

TULLOW

3 June 2010

Bank of Valletta p.l.c.
58 Zachary Street
Valletta VLT 04
Malta

For attention: Chief Executive Officer

Dear Sir,

LETTER OF POWER OF ATTORNEY TO Mr Brian Glover

We refer to the power of attorney registered,in your office on the 1st of June 2010, to specify that Mr. Brian Glover it is authorised to make payments in cash up to 500,000 Euro (five hundred thousand) to the introduced Representative of East Africa Development ltd, [redacted] Kahamba Kutesa born in Sembabule, Uganda the 1st of February 1949.

Aiden Heavey
Chief Executive Officer
Tullow Oil plc.

3 June 20

Bank of Valletta p.l.c.
58 Zachary Street
Valletta . LT 04
Malta

Laid on Table by Hon. Karuhanga Gerald 11th Oct. 2011

For attention: Chief Executive Officer

Dear Sir,

LETTER OF POWER OF ATTORNEY TO Mr Brian Glover

We refer to the power of attorney registered, in your office on the 1st of June 2010, to specify that Mr. Brian Glover it is authorised to make payments in cash up to 500,000 Euro (five hundred thousand) to the introduced Representative of East Africa Development ltd, Sam Kahamba Kutesa born in Sembabule, Uganda the 1st of February 1949.

Aidan Heavey
Chief Executive Officer
Tullow Oil plc.

Bank of Valletta p.l.c
Registration No. C 2833
Registered Office: 58 Zachary Street, Valletta VLT 04 - Malta

Transaction Reference
No.: 53243216

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 04-06-2010-09.57
Document Id: 72085539

Laid on Table by Hon. Kanuhanga Gerald on 11th oct. 2011

From account:	40037242019 (EUR)
Beneficiary account number:	London branch Cash movement (Brian Glover)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Not-available
Bank's BIC/SWIFT:	Not-available
Bank country is SEPA:	Not-available
Bank's country:	United Kingdom
Beneficiary name:	Not-available ?
Instructed amount in currency of your account:	500,000.00 2bn
Instructed amount in payment currency:	500,000.00
Amount debited from your account:	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate:	1.000000
Payment details:	Not-available
Same day value payment:	Yes
External Transaction Classification:	Cash movement
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Not-available
Country:	Not-available
Beneficiary type:	Not-available
Residence:	Not-available
Future transfer date if applicable (DD/MM/YYYY):	10/06/2010
Transaction charge:	EUR 16.00

System message:	Your instructions have been accepted and will be processed on 04/06/2010.
Result code:	0971(10001)

7

Printing form

(13) Laid at Table by Hon. Karuhanga Gerald on 10th Oct, 2011

Page 1 of 1

(SCA)

Bank of Valletta p.l.c
Registration Number: C 2833
Registered Office: 58 Zachary Street, Valletta VLT 1130 - Malta

Transaction Reference
No.: 53243329

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 10 06 2010-12 20
Document Id: 72085539

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Emirates Bank
Bank's BIC/SWIFT	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account:	500,000.00 2bn
Instructed amount in payment currency:	500,000.00
Amount debited from your account:	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	21/06/2010
Transaction charge:	EUR 16.00

System message	Your instructions have been accepted and will be processed on 10.06/2010.
Result code	1011(20007)

Bank of Valletta p.l.c
Registration Number C 2833
Registered Office 58 Zachary Street, Valletta VLT 04, Malta

Transaction Reference No.: 53243329

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 10 06 2010-12:20
Document Id: 72085539

Tabled by Hon. Banyayanga Andrew on 11th Oct. 2011

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name	Emirates Bank
Bank's BIC/SWIFT	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account:	500.000.00
Instructed amount in payment currency:	500.000.00
Amount debited from your account:	500.016.00
Amount credited to beneficiary	500.000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	21/06/2010
Transaction charge:	EUR 16.00

System message.	Your instructions have been accepted and will be processed on 10/06/2010.
Result code:	1011(20007)

Bank of Valletta p.l.c
Registration No. [illegible]
Registered [illegible] Zachary Street, Valletta VLT 04 - Malta

Transaction Reference
No.: 53243325

Payment to Third Parties

Laid on Table by
Hon. Kanihanga Gerald
on 11th Oct 2011

Printed by: Mr. Brian Glover
Printed at: 10-06-2010-11:40
Document Id: 72085539

From account:	4003724201 9 (EUR)
Beneficiary account number:	GB36EFGB17800000491740
IBAN:	Yes
Currency of payment:	EUR
Foreign bank name:	EFG Private bank Ltd
Bank's BIC/SWIFT:	EFGBGB2L
Bank country is SEPA:	Yes
Bank's country:	United Kingdom
Beneficiary name:	East Africa Development Ltd
Instructed amount in currency of your account:	1,500,000.00 6bn
Instructed amount in payment currency:	1,500,000.00
Amount debited from your account:	1,500,016.00
Amount credited to beneficiary	1,500,000.00
Exchange rate:	1.000000
Payment details:	Invoice 1 dated 9-06-10
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not available
City & Post Code:	Nairobi 00619
Country:	Kenya
Beneficiary type:	Commercial Entity
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	21/06/2010
Transaction charge:	EUR 16.00
System message:	Your instructions have been accepted and will be processed on 10/06/2010.
Result code:	1001(20004)

PARLIAMENT LIBRARY
P O BOX 7178, KAMPALA
13 OCT 2011
ACC NO.........
CALL NO.........

8

Bank of Valletta p.l.c
Registration Number C 2833
Registered Office 58 Zachary Street Valletta VLT 04 Malta

Transaction Reference No.: 53243419

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 21/06/2010-10:01
Document Id. 72085539

Tabled by
Hon. Banyayanga Andrew
on 11th oct. 2011

From account:	4003724201 9 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment	EUR
Foreign bank name:	Emirates Bank
Bank's BIC/SWIFT:	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name:	Hilary Obaloker Onek
Instructed amount in currency of your account:	500,000.00
Instructed amount in payment currency:	500,000.00
Amount debited from your account:	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	06/07/2010
Transaction charge.	EUR 16.00

System message	Your instructions have been accepted and will be processed on 21/06/2010
Result code	1021(20011)

Bank of Valletta p.l.c

Transaction Reference
No.: 53243413

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 21-06-2010-09:40
Document Id: 72085539

Laid on Table by Hon. Karuhanga Gerald on 11th oct. 2011

From account:	4003724201 9 (EUR)
Beneficiary account number:	GB36EFGB17800000491740
IBAN:	Yes
Currency of payment:	EUR
Foreign bank name:	EFG Private bank Ltd
Bank's BIC/SWIFT:	EFGBGB2L
Bank country is SEPA:	Yes
Bank's country:	United Kingdom
Beneficiary name:	East Africa Development Ltd
Instructed amount in currency of your account:	1,500,000.00 6 bn
Instructed amount in payment currency:	1,500,000.00
Amount debited from your account:	1,500,016.00
Amount credited to beneficiary	1,500,000.00
Exchange rate:	1.000000
Payment details:	Invoice 2 dated 18-06-10
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Nairobi 00619
Country:	Kenya
Beneficiary type:	Commercial Entity
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	06/07/2010
Transaction charge:	EUR 16.00

System message:	Your instructions have been accepted and will be processed on 21/06/2010.
Result code:	1017(20032)

(12) Laid at Table by Hon. Karuhanga Gerald on 10th Oct, 2011 — [signature] (SCA)

Bank of Valletta p.l.c
Registration Number C 2833
Registered Office 58 Zachary Street Valletta VLT 04 Malta

Transaction Reference No.: 53243419

Payment to Third Parties

Printed by Mr Brian Glover
Printed at 21 06 2010-10:01
Document Id 72085539

From account:	4003724201 9 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Emirates Bank
Bank's BIC/SWIFT:	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name:	Hilary Obaloker Onek
Instructed amount in currency of your account:	500,000.00 2bn
Instructed amount in payment currency:	500,000.00
Amount debited from your account:	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	06/07/2010
Transaction charge:	EUR 16.00

System message	Your instructions have been accepted and will be processed on 21/06/2010
Result code	1021120011

BOV printing form

(10) Laid at Table by Hon. Katuhanga Gerald on 10th Oct, 2011

(SEA)

Bank of Valletta p.l.c

Registration Number ... Registered Office ...

Transaction Reference No.: 53243938

Payment to Third Parties

Printed by Mr Brian Glover
Printed at 16 07 2010-08 51
Document Id 72085539

From account:	40037242019 (EUR)
Beneficiary account number.	0034 450 527 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name.	Emirates Bank
Bank's BIC SWIFT:	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account:	1.500.000.00 6 bn
Instructed amount in payment currency:	1.500.000.00
Amount debited from your account:	1.500.016.00
Amount credited to beneficiary	1.500.000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00

System message	Your Instructions have been accepted and will be processed on 16/07/2010
Result code	1097(20091)

(ii) Laid at Table by Hon. Karuhanga Gerald on 10th Oct, 2011

(SEA)

Bank of Valletta p.l.c

Registration Number C 2833
Registered office 58 Zachary Street Valletta VLT 01 Malta

Transaction Reference No.: 53243539

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 06 07 2010-15 20
Document Id: 72085539

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name.	Emirates Bank
Bank's BIC/SWIFT	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name.	Hilary Obaloker Onek
Instructed amount in currency of your account:	500,000.00 2 bn
Instructed amount in payment currency:	500,000.00
Amount debited from your account:	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type.	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00

System message.	Your instructions have been accepted and will be processed on 06/07/2010.
Result code	1061(20012)

Bank of Valletta p.l.c
[illegible]
[illegible] Street, Valletta VLT [illegible] - Malta

Transaction Reference
No.: 53243716

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 08/07/2010-11:03
Document Id: 72085539

Laid on Table by Hon. Karuhanga Gerald on 11th Oct. 2011

From account:	4003724201 9 (EUR)
Beneficiary account number:	GB36EFGB17800000491740
IBAN:	Yes
Currency of payment:	EUR
Foreign bank name:	EFG Private bank Ltd
Bank's BIC/SWIFT:	EFGBGB2L
Bank country is SEPA:	Yes
Bank's country:	United Kingdom
Beneficiary name:	East Africa Development Ltd
Instructed amount in currency of your account:	3,500,000.00 1.7bn
Instructed amount in payment currency:	3,500,000.00
Amount debited from your account:	3.500.016.00
Amount credited to beneficiary	3,500,000.00
Exchange rate:	1.000000
Payment details:	Invoice 3 dated 8-07-10
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Nairobi 00619
Country:	Kenya
Beneficiary type:	Commercial Entity
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00
System message:	Your instructions have been accepted and will be processed on 08/07/2010.
Result code:	1078(20056)

34

Bank of Valletta p.l.c

Transaction Reference
No.: 53243534

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 06/07/2010-14:59
Document Id: 72085539

Laid on Table by Hon. Karuhanga Gerald on 11th oct. 2011

From account:	4003724201 9 (EUR)
Beneficiary account number:	London branch Cash movement (Brian Glover)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Not-available
Bank's BIC/SWIFT:	Not-available
Bank country is SEPA:	Not-available
Bank's country:	United Kingdom
Beneficiary name:	Not-available
Instructed amount in currency of your account:	500,000.00 2bn
Instructed amount in payment currency:	500,000.00
Amount debited from your account:	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate:	1.000000
Payment details:	Not Available
Same day value payment:	Yes
External Transaction Classification:	Cash movement
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Not-available
Country:	Not-available
Beneficiary type:	Not-available
Residence:	Not-available
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00

System message:	Your instructions have been accepted and will be processed on 06/07/2010.
Result code:	1053(20004)

Transaction Reference No.: 53243731

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 12 07 2010-09:08
Document Id: 72085539

Laid on Table by Hon Karuhanga Gerald on 11th Oct. 2011

From account:	4003724201 9 (EUR)
Beneficiary account number:	GB36EFGB17800000491740
IBAN:	Yes
Currency of payment:	EUR
Foreign bank name:	EFG Private bank Ltd
Bank's BIC/SWIFT:	EFGBGB2L
Bank country is SEPA:	Yes
Bank's country:	United Kingdom
Beneficiary name:	East Africa Development Ltd
Instructed amount in currency of your account:	5,000,000.00
Instructed amount in payment currency:	5,000,000.00
Amount debited from your account:	5,000,016.00
Amount credited to beneficiary:	5,000,000.00
Exchange rate:	1.000000
Payment details:	Invoice 4 dated 12-07-10
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Nairobi 00619
Country:	Kenya
Beneficiary type:	Commercial Entity
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00

System message:	Your instructions have been accepted and will be processed on 12/07/2010.
Result code:	1084(20069)

PARLIAMENT LIBRARY
P O BOX 7178. KAMPALA
13 OCT 2011
ACC NO.
CALL NO.

Bank of Valletta p.l.c

Transaction Reference
No.: 53243934

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 12 07 2010-08:08
Document Id: 72085539

Laid on Table by
Hon. Karuhanga Gerald
11th Oct. 2011

From account:	4003724201 9 (EUR)
Beneficiary account number:	GB36EFGB17800000491740
IBAN:	Yes
Currency of payment:	EUR
Foreign bank name:	EFG Private bank Ltd
Bank's BIC/SWIFT:	EFGBGB2L
Bank country is SEPA:	Yes
Bank's country:	United Kingdom
Beneficiary name:	East Africa Development Ltd
Instructed amount in currency of your account:	5,000,000.00
Instructed amount in payment currency:	5,000,000.00
Amount debited from your account:	5,000,016.00
Amount credited to beneficiary	5,000,000.00
Exchange rate:	1.000000
Payment details:	Invoice 5 dated 16-07-10
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Nairobi 00619
Country:	Kenya
Beneficiary type:	Commercial Entity
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00

System message:	Your instructions have been accepted and will be processed on 16/07/2010.
Result code:	1091(20078)

2

..ry printing form

Bank of Valletta p.l.c
Registration Number C 2833
Registered Office 58 Zachary Street Valletta VLT 04 Malta

Transaction Reference No.: 53243938

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 16/07/2010-08:54
Document Id: 72085539

Tabled by Hon. Baryayanga Andrew on 11th Oct. 2011 Dad (CA)

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Emirates Bank
Bank's BIC SWIFT:	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name:	Hilary Obaloker Onek
Instructed amount in currency of your account:	1.500.000.00
Instructed amount in payment currency:	1.500.000.00
Amount debited from your account:	1.500.016.00
Amount credited to beneficiary:	1.500.000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code	Dubai P.O. Box 2923
Country	U.A.E.
Beneficiary type.	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00

System message	Your Instructions have been accepted and will be processed on 16/07/2010.
Result code	1097(20091)

Bank of Valletta p.l.c
Registration Number C 2833
Registered Office 58 Zachary Street Valletta VLT 04 Malta

Transaction Reference No.: 53243539

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 06 07 2010-15:20
Document Id: 72085539

Tabled by Hon. Baryayanga Andrew on 11th Oct. 2011

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 527 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Emirates Bank
Bank's BIC/SWIFT	IRVRTUS3N
Bank country is SEPA:	No
Bank's country	Dubai - U.A.E.
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account:	500.000.00
Instructed amount in payment currency:	500.000.00
Amount debited from your account:	500.016.00
Amount credited to beneficiary	500.000.00
Exchange rate	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type.	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge:	EUR 16.00
System message.	Your instructions have been accepted and will be processed on 06/07/2010
Result code	10611(20012)

BOV printing form

(9) Laid at Table by Hon. Karuhanga Gerald on 10th OCT, 2011 — [signature] (SEA)

Bank of Valletta p.l.c
Registration Number C 2833
Registered office: 58 Zachary Street Valletta VLT 1130 - Malta

Transaction Reference No.: 53243217

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 05.08.2010-09.34
Document Id: 72085539

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Emirates Bank
Bank's BIC/SWIFT:	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name:	Hilary Obaloker Onek
Instructed amount in currency of your account:	3.000.000.00 12bn
Instructed amount in payment currency:	3.000.000.00
Amount debited from your account:	3.000.016.00
Amount credited to beneficiary:	3.000.000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	10/08/2010
Transaction charge:	EUR 16.00

System message	Your instructions have been accepted and will be processed on 05/08/2010
Result code	2007(30001)

Bank of Valletta p.l.c
Registration Number C 2833
Registered Office 58 Zachary Street Valletta VLT 04 Malta

Transaction Reference No.: 53243217

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 05 08 2010-09 34
Document Id: 72085539

Tabled by Hon. Baryayanga Andrew on 11th Oct. 2011
Dad (CA)

From account:	40037242019 (EUR)
Beneficiary account number:	0034 450 627 007 (EUR)
IBAN:	No
Currency of payment:	EUR
Foreign bank name:	Emirates Bank
Bank's BIC/SWIFT:	IRVRTUS3N
Bank country is SEPA:	No
Bank's country:	Dubai - U.A.E.
Beneficiary name:	Hilary Obaloker Onek
Instructed amount in currency of your account:	3.000.000 00
Instructed amount in payment currency:	3.000.000.00
Amount debited from your account:	3.000.016.00
Amount credited to beneficiary	3.000.000.00
Exchange rate:	1.000000
Payment details:	Downpayment professional services
Same day value payment:	Yes
External Transaction Classification:	Other Payments
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by:	Originator of payment
Address Line 1:	Not-available
City & Post Code:	Dubai P.O. Box 2923
Country:	U.A.E.
Beneficiary type:	Individual
Residence:	Non-Resident
Future transfer date if applicable (DD/MM/YYYY):	10/08/2010
Transaction charge:	EUR 16.00

System message	Your instructions have been accepted and will be processed on 05/08/2010
Result code:	2007(30001)

Gmail Calendar Documents Reader Sites Web more »

ndugujohn@gmail.com | Settings | Help | Sign out

You are currently viewing Gmail in basic HTML. Switch to standard view | Set basic HTML as default view

Gmail

Search Mail | Search the Web | Show sea... | Create a...

Compose Mail
Inbox (1)
Starred
Sent Mail
Drafts (7)
All Mail
Spam (3)
Trash

Contacts

Labels
Personal
Receipts
Travel
Work
Edit labels

« Back to Inbox | Archive | Report Spam | Delete | More Actions... | Go

‹ Newer 95 of 116 Older ›

Print | New window

RE: EAST AFRICA DEVELOPMENT LIMITED

Inbox

George.P.Simpson@met.police.uk <George.P.Simpson@met.police.uk>
To: ndugujohn@gmail.com

Wed, Jan 19, 2011 at 6:33 PM

Reply | Reply to all | Forward | Print | Delete | Show original

Dear Mr Ndungutse,

RE: EAST AFRICA DEVELOPMENT LIMITED

I make reference to your Mutual Legal Assistance Treaty Letter of Request request concerning East African Development Limited, dated 12 January 2010, which has been referred to the United Kingdom Central Authority (UKCA) for action by the Metropolitan Police Service Proceeds of Corruption Unit.

I have examined the supporting documents viz. Tullow Oil Power of Attorney and Bank of Valetta plc 3rd party payment forms. The 3rd party payment forms [on the face of it] suggest that monies have paid to an account held by East Africa Development Ltd with EFG Private Bank Limited in the UK.

I have established that there are 2 banks named EFG operating in the United Kingdom:-

i. EFG Private Bank Limited, and

ii. EFG Eurobank Ergasius

I have spoken with the Compliance Departments of both banks to establish whether they hold bank accounts relevant to your investigation and they do not.

EFG Private Bank Limited (EFGPBL) state that the SWIFT code EFGBG2L on the 3rd party payment forms is their SWIFT code, but the Beneficiary account number or IBAN number GB36EFGB17800000491740 is not their IBAN number and does not match any EFGPBL bank accounts. They do not hold an account in the name of East Africa Development Limited.

EFG Eurobank Ergasius state that neither the SWIFT code nor IBAN number relate to their bank, nor do they hold an account in the name of East Africa Development Limited.

Both banks state that if EUR 16.5 million had been received into their accounts, such activity would have triggered thei. anti-money laundering processes and the transaction(s) would have been closely scrutinised before the money was allowed to enter their banking system(s). Similarly, both banks are aware of their

Laid on Table by Hon. Kutesa Sam 11th Oct 2011 obligations under UK money laundering regulations concerning 'politically exposed persons' [PEPs] and if they had an account in the name of or linked to a government official (e.g. Sam Kahamba Kutesa) this would also be carefully scrutinised and in alll likeliehood disclosed to UK law enforcement authorities. EFG Eurobank Ergasius is a Greek owned bank whose mainly Greek clients are involved in the shipping industry. Neither bank has business interests or a client profile in East Africa.

As discussed the most sensible next step would be for you to contact the authorities in Malta in order that enquiries can be made of the Bank of Valetta plc to see if they hold an account in the name of Brian Glover / Tullow Oil and for the bank to examine the 3rd party payment forms to see whether they are actually their forms.

I have doubts as to the authenticity of the Tullow Oil plc Power of Attorney letter, purportedly signed by CEO Aidan Heavey. I appreciate that you are working from copy documents, but the layout of the letter does not seem to be consistent with something that a big corporation like Tullow Oil would send out. I doubt that the CEO of such a company would sign off a letter of this nature. Can you check with your source(s)?

Please do not hesitate in contacting me if you require further information.

Kind regards,

George Simpson

Laid on Table by Sam Kutesa 11th Oct 2011
Had

George SIMPSON I Detective Sergeant
SCD6 Economic and Specialist Crime OCU
Money Laundering Investigation Team (M.L.I.T.) - Proceeds of Corruption Unit [PEPs]
Met Phone 67455 I **Telephone** +44 [0]207 230 7455 I **Fax** +44 [0]207 230 7458 I
Mobile 07723370996
Address New Scotland Yard, Room 552 Victoria Block, Broadway, London SW1H 0BH

POLICE GENERAL HEADQUARTERS
Floriana,
Malta.

All communications should be addressed to the Commissioner of Police, and not to individual Officers by name or appointment

Laid on Table by
Hon. Kutesa Sam
11th Oct - 2011

Our Reference No. ENQ/16/LR/11
Your Reference No.

21 June 2011

The Attorney General
Office of the Attorney General
The Palace
Valletta, Malta

Attn: Dr. Donatella Frendo Dimech, LL.D

Re: Letter Rogatory received from Uganda bearing reference number PRO/68/1

With reference to the Letter Rogatory from Uganda dated 4 April 2011. Consequently, Bank of Valletta p.l.c., (BOV) was requested to furnish this end with all the information requested by the Ugandan Authorities. BOV was also furnished with a copy of all the alleged transactions for verification. Subsequently, a thorough and lengthy search was conducted by the mentioned bank staff, which unfortunately yielded negative results.

Therefore it was concluded without any doubt that the companies and persons mentioned in the Letter Rogatory do not hold any accounts with BOV and the transactions receipt submitted are forgeries as no such transfer of monies had ever taken place.

Attached herewith is the official letter received from Bank of Valletta regarding the search carried out.

Hope that the information provided above will help you in your investigation.

Regards

Insp. Maurice Curmi
21 JUN 2011
MALTA POLICE

Insp. Maurice Curmi
Economic Crime Unit
Malta Police

Tullow Oil plc

Building 9, Chiswick Park, 566 Chiswick High Road, London, W4 5XT
Tel: +44 (0)203 249 9000 Fax: +44 (0)203 249 8801

TULLOW plc

Rt. Hon. Rebecca Kadaga
Speaker Parliament of Uganda
P.O Box 7178,
Kampala, Uganda

11 October 2011

Dear Madam Speaker,

BRIBERY AND CORRUPTION ALLEGATIONS – PARLIAMENTARY SESSION OF 10 OCTOBER 2011

We are in the process of reviewing the groundless allegations made against Tullow, and certain of its employees, during yesterday's Parliamentary session. We wish to make the following preliminary statement for the public record:

1. Tullow Oil totally rejects the outrageous and wholly defamatory accusations of corruption made against the Company in the Ugandan Parliament yesterday. If these comments are repeated or made outside Parliament, Tullow will examine all possible legal action to protect the reputation of the company and its employees;

2. Reference was made during yesterday's debate to documentation which purportedly evidences payments made by Tullow to certain Government Ministers through a Maltese Bank. Tullow does not have and has never had any bank accounts in Malta. In addition, we can say with complete confidence that any documents that purportedly relate to transfers from Tullow accounts to Government Ministers are forgeries. We would urge the individuals in possession of these documents to provide them to Tullow and the appropriate Ugandan authorities as soon as possible;

3. A number of serious allegations were made about Tullow's operations in Uganda and the way the Company does business. These accusations are demonstrably false and appear to be founded on misunderstandings about how the global oil and gas industry works. Tullow would welcome the opportunity to appear at an appropriate forum in Parliament to refute these serious allegations and to explain, with other representatives from the industry, how the industry in which we are proud to work operates.

Tullow is deeply committed to its work in Uganda and operates to the highest standards of ethical behaviour. We take a zero tolerance approach to bribery and corruption and our policies are enshrined in our Code of Business Conduct. This code is in turn incorporated into all our contracts with employees, contract staff and industry partners.

Yours faithfully,

A.J. Heavey

Aidan Heavey
Chief Executive Officer

CC The Minister of Finance, Planning and Economic Development
The Minister of Energy and Mineral Development
The Minister for Ethics and Integrity

Registered in England and Wales: Number 3919249
Registered Office as above

Tullow Oil plc

Building 9, Chiswick Park, 566 Chiswick High Road, London, W4 5XT
Tel: +44 (0)203 249 9000 Fax: +44 (0)203 249 8801

TULLOW Oil plc

Mr. Richard Alderman
Director, Serious Fraud Office
10-16 Elm Street
London. WC1X 0BJ

11 October 2011

Dear Richard,

BRIBERY AND CORRUPTION ALLEGATIONS – UGANDA PARLIAMENTARY SESSION OF 10 OCTOBER 2011

Yesterday, in Uganda's parliament certain allegations were made about Tullow and certain of its employees. You may already have noticed these allegations on the internet, in the press or via your own intelligence sources.

For your information I have attached a letter which Tullow has just sent to the Speaker of the Ugandan Parliament and which is self explanatory. We understand that this letter will be read in Parliament later today.

We are also in the process of notifying all relevant Embassies and the press in Uganda and drawing their attention to the attached correspondence. We are also in discussions with international press agencies that have picked up the story.

It goes without saying that we in Tullow are fully committed to our anti-bribery and corruption programme and are taking these defamatory allegations extremely seriously.

Yours sincerely,

Stephen Rees
Group Compliance Manager

CC Barry Collins, Chief Intelligence Officer – SFO

Tullow Oil plc

Building 9, Chiswick Park, 566 Chiswick High Road, London, W4 5XT
Tel: +44 (0)203 249 9000 Fax: +44 (0)203 249 8801

Mr. Richard Alderman
Director, Serious Fraud Office
10-16 Elm Street
London. WC1X 0BJ

21 October 2011

Dear Richard,

BRIBERY AND CORRUPTION ALLEGATIONS – UGANDA PARLIAMENTARY SESSION OF 10/11 OCTOBER 2011

Following my recent letter to you on 11th October 2011 I would like to update you on the outcome of our own internal investigation into the allegations of corruption made under parliamentary privilege in Uganda last week.

Attached to this letter are certain documents that were presented to Uganda's Parliament during last week's Parliamentary debate. We requested copies of all documents put before Parliament as these are available to the public through the Ugandan Parliamentary Clerk.

We have not attached the whole file, as a number of the documents provided address different and unrelated issues, however, should you wish to review the full Parliamentary file we would be very happy to provide this.

The documents attached to this letter are grouped as follows:

1. A letter purportedly from Aidan Heavey to the Bank of Valletta authorising Brian Glover (Tullow Country Manager) to make certain payments in cash up to 500,000 Euros. This document is forged as no such letter was ever produced by Tullow or signed by Aidan Heavey;
2. A bundle of payment receipts in relation to the same (all such documentation we believe to be forged);
3. A letter from the Maltese police to the Maltese Attorney General dated 21 June 2011 in relation to this matter (which was presented in Ugandan Parliament by one of the accused Ugandan politicians);
4. Emails from a George Simpson of the Metropolitan Police from January 2011 in relation to this matter (again presented in the Ugandan Parliament by one of the accused Ugandan politicians);
5. Copies of witness statements given by Minister Onek and Brian Glover in August / September 2010 to the Ugandan police authorities when these allegations first came to light.

We have taken this whole matter very seriously, not least because such egregiously false allegations have a profoundly negative impact upon the excellent reputation that Tullow has built internationally over many years.

We considered engaging an independent third party to investigate the origin of these forged documents but determined that any such investigation would not be productive or conclusive. Additionally, we understand that this matter is being investigated by the relevant authorities in Uganda, hence we believe that this will further demonstrate that the allegations against Tullow are totally unfounded and may also shed light on the origin of the forged documents.

Registered in England and Wales: Number 3919249
Registered Office as above

We work in some very challenging economic and political environments and remain fully committed to our anti-bribery programme and zero tolerance to any form of bribery.

If you wish to discuss any aspect of these allegations, or indeed better understand how we are implementing our anti-bribery programme across Tullow, then we would be very pleased to meet with you.

Yours sincerely,

Stephen Rees
Group Compliance Manager

CC Barry Collins, Principal Intelligence Officer, SFO

Jerome Basdeo

From: George Cazenove
Sent: 08 November 2011 14:14
To: alex.stephens@met.police.uk
Cc: Alasdair Murray; Jerome Basdeo
Subject: Tullow Oil / Metropolitan Police
Attachments: Emails from MET Police.pdf

Dear Alex,

Good to talk to you earlier.

Please see below an email from my colleague Jerome Basdeo for your legal department which explains the issue that Tullow is currently wrestling with. The list below is something of a wish-list really and any guidance from you or your legal department on how to proceed would be much appreciated.

Many thanks
George Cazenove

George Cazenove
Head of Media Relations
Tullow Oil plc
☎ work: +44 (0) 20 3249 9997
☎ mobile: +44 (0) 7834 767054
✉ email: george.cazenove@tullowoil.com
internet: www.tullowoil.com
9 Chiswick Park, 566 Chiswick High Road, London, W4 5XT

Follow Tullow on

From: Jerome Basdeo
Sent: 08 November 2011

As you may be aware, Tullow has recently been falsely accused in the Ugandan Parliament of transferring money to accounts associated with certain Ugandan Government Ministers. Documents were presented to the Ugandan Parliament which purported to evidence these allegations. Documents were also presented to Parliament by the accused Government Ministers to rebut the allegations (one such document was from the Metropolitan Police, an email from Detective Sergeant George P. Simpson dated 19 January 2011 – see attached). We understand that the documents that are alleged to prove the allegations and which we believe are fake were presented to the Metropolitan Police by the Government of Uganda in 2010.

As a consequence of these allegations, the Ugandan Parliament has set up an Ad Hoc Committee to investigate these allegations and also look into certain issues relevant to the Ugandan Oil and Gas Industry. Tullow expects to be called to give evidence to the Ad Hoc Committee.

In anticipation of Tullow being called, we kindly request a written confirmation from the Metropolitan Police that:

- the Metropolitan Police Service Proceeds of Corruption Unit received a letter from Mr Ndungutse dated 12 January 2010 enclosing an alleged Tullow Oil Power of Attorney and Bank of Valetta plc 3rd party payment forms. The 3rd party payment forms appear to suggest that monies totalling EUR 16.5 million were paid into an account held by East Africa Development Ltd with EFG Private Bank Limited;

- the Metropolitan Police Service Proceeds of Corruption Unit conducted a thorough investigation into these documents (an explanation of the nature of the investigation conducted would be very helpful);

- the results of the Metropolitan Police Service Proceeds of Corruption Unit's investigation were that:

(a) the two EFG banks operating in the United Kingdom, EFG Private Bank Limited and EFG Eurobank Ergasius, do not have any accounts relevant to the investigation nor do they hold any accounts in the name of East Africa Development Ltd;
(b) if the alleged payment of EUR 16.5million had been received by either bank, its money laundering processes would have been triggered. At no time, were the banks' money laundering processes triggered;
(c) neither bank has business interests or a client profile in East Africa; and
(d) The Metropolitan Police Service Proceeds of Corruption Unit doubted the authenticity of these documents especially the Tullow Oil Power of Attorney letter purported to be signed by Aidan Heavey.

While a letter from the Metropolitan Police to Tullow would suffice, so that its authenticity cannot be questioned, a more appropriate form of confirmation might be a sworn affidavit from Detective Sergeant Simpson to reflect the above. Please let us know if this would be possible.

This is a situation where both Tullow and the Metropolitan Police are aware that the supporting documents referred to above are false. So that Tullow are able to continue to protect the integrity of both parties we would be grateful if you could assist us with the above in a timely manner particularly as we may be called to give evidence in the coming weeks.

Maybe we could arrange a meeting / conference call between relevant Tullow individuals and the relevant persons at the Metropolitan Police. Please let me know.

Yours sincerely,
Jerome Basdeo

Jerome Basdeo
Legal and Corporate Support
Tullow Oil plc, 9 Chiswick Park, 566 Chiswick High Road, London, W4 5XT.
Direct: +44 (0)203 249 9726
Main Switchboard: +44 (0)203 249 9000

Jerome Basdeo

From: John.McDonald@met.police.uk
Sent: 09 November 2011 14:59
To: Jerome Basdeo
Cc: George Cazenove
Subject: Tullow Oil/Metropolitan Police

Mr Basdeo,

Further to your recent report I can confirm receipt of your request. I have been assigned to assist your enquiry.

I can confirm that the matter has been allocated to one of our lawyers at the Metropolitan Police Service Department for Legal Services (DLS), your request for assistance is being considered.

In the meantime should you wish to contact me I can be contacted on the numbers below.

Kindest Regards

DC John McDonald

John McDONALD I Detective Constable
SCD6 Economic and Specialist Crime OCU
Proceeds of Corruption Unit (PEPs)
Met Phone 62758 I Telephone +44 (0) 207 230 2758 Fax +44 (0)207 230 7458 I Mobile 07775 918999
Address New Scotland Yard, Room 552 Victoria Block, Broadway, London, SW1H 0BH

----- Original Message -----
From: Barry Collins [mailto:Barry.Collins@sfo.gsi.gov.uk]
Sent: Friday, November 11, 2011 06:37 PM
To: Stephen Rees
Subject: Uganda Allegations

Dear Stephen

I am writing following your e mail of the 11th October and subsequent correspondence regarding allegations made against Tullow Oil in the Ugandan Parliament.

Having now had the time to review all the documentation, and having made some initial inquiries, I can confirm that the Serious Fraud Office will not be commencing an investigations into this matter at this time.

Thank you for bringing this matter to our attention so promptly.

Yours sincerely

Barry Collins

Barry Collins | Principal Intelligence Officer | SFO | Elm House | 10-16 Elm St. | London | WC1X 0BJ | +44 (0) 207 239 7484

Your reference:

Our reference:

Date: 14th November 2011

POLICE

METROPOLITAN POLICE SERVICE

Economic & Specialist Crime Operational Command Unit
Proceeds of Corruption Unit
Room 552, Victoria Block;
New Scotland Yard
London SW1X 0BG

Telephone: 0044 207-230-2758
Facsimile: 0044 207-230-7458
e-mail: john.mcdonald1@met.pnn.police.uk

Mr Jerome Basdeo
Tullow Oil

Dear Mr Basdeo,

Tullow Oil - East Africa Development Limited

Further to our recent telephone conversation I can confirm that I have sought legal advice in respect of your request dated the 8th of November 2011. You are of course aware of an e-mail sent by Detective Sergeant George Simpson which has been aired in the Ugandan Parliament apparently on the 11th of October 2011.

I can confirm that in the circumstances it would not be appropriate for the Metropolitan Police Service to provide either a letter or a statement detailing DS Simpson's investigation which was carried out following contact between the United Kingdom and Uganda.

However I would like to formally request that Mr. Adrian Heavey, Chief Executive Officer, Tullow Oil provide a formal statement to the Metropolitan Police having first had sight of a letter dated 3 June 2010 purporting to be from Tullow Oil. The letter in question refers to a Power of Attorney for Mr. Brian Glover and makes further reference to the East African Development Limited and Sam Kahamba Kutesa. That statement can take the form of statement or a sworn affidavit.

I would also formally request a statement from Mr. Brian Glover an employee of Tullow Oil. Mr. Glover should be given an opportunity to review the attached documents.

I would also like to obtain a formal statement from an appropriate official of your company in respect of the attached bank transfers:

- Bank of Valletta transaction reference 53243216 dated 10/06/2010, in the sum of 500,000 EUR

- Bank of Valletta transaction reference 53243325 dated 21/06/2010, in the sum of 1, 500,000 EUR

- Bank of Valletta transaction reference 53243413 dated 06/07/2010, in the sum of 1, 500,000 EUR

- Bank of Valletta transaction reference 53243534 dated 06/07/2010, in the sum of 500,000 EUR

- Bank of Valletta transaction reference 53243934 dated 16/07/2010, in the sum of 5,000,000 EUR.

- Bank of Valletta transaction reference 53243716 dated 17/07/2010, in the sum of 3, 500,000 EUR

Can the appropriate person whether, be it Mr. Heavey, Mr. Glover or another representative of your company please include answers to the following questions in their statement:

- Does Tullow Oil have a business interest with an entity called the East Africa Development Limited, if so can the relationship be explained? If a relationship exists can any documents pertaining to Tullow Oil's professional dealings with that company be provided to the Metropolitan Police.

- Has Mr. Brian Glover ever been designated as an authorized power of attorney to act on behalf of Tullow Oil in respect of a company known as the East African Development Limited and furthermore has Mr. Glover ever had occasion to make payments to Sam Kahamba KUTESA as indicated in the document dated 3rd June 2010.

- **Does Tullow Oil have a bank account with the Bank of Valetta, if so can they provide the full details of their account/accounts.**

- **Are any of the attached transfers through the EFG Private Bank Limited legitimate transactions?**

- Does Tullow Oil operate bank accounts with the EFG Private Bank Limited or EFG Eurobank Ergasius and if so can their relevant bank account details be provided.

If you have any questions to ask of my please do not hesitate to contact me on 0207 230 2758.

Yours faithfully

John McDonald
Detective Constable

Jerome Basdeo

From: John.McDonald@met.police.uk
Sent: 14 November 2011 10:36
To: Jerome Basdeo
Subject: RE: Tullow Oil/Metropolitan Police

Jerome,

I will chase it up for you.

thanks

John

From: Jerome Basdeo [mailto:Jerome.Basdeo@tullowoil.com]
Sent: 14 November 2011 09:21
To: McDonald John - SCD6
Cc: George Cazenove; Alasdair Murray
Subject: RE: Tullow Oil/Metropolitan Police

Dear John,

Further to our conversation last week, I wondered if you had an update on whether your legal department had given any indication when they will be able to respond to our request?

As I mentioned last week ideally we need to know the MET's position as soon as possible, as we anticipate being called before the Ugandan Parliamentary Committee at very short notice.

Many thanks,

Jerome

From: Jerome Basdeo
Sent: Wednesday, November 09, 2011 04:26 PM
To: John.McDonald@met.police.uk <John.McDonald@met.police.uk>
Cc: George Cazenove; Alasdair Murray
Subject: RE: Tullow Oil/Metropolitan Police

Hi John,

Good to speak to you earlier.

As I mentioned on the phone, if there is anything further you need from us please just let me know.

All the best,

Jerome

Jerome Basdeo
Legal and Corporate Support
Tullow Oil plc, 9 Chiswick Park, 566 Chiswick High Road, London, W4 5XT.
Direct: +44 (0)203 249 9726
Main Switchboard: +44 (0)203 249 9000

Email: jerome.basdeo@tullowoil.com

Jerome Basdeo

From: John.McDonald@met.police.uk
Sent: 14 November 2011 16:55
To: Jerome Basdeo
Subject: RE: Tullow Oil plc - Statements

Jerome.

No a sworn affidavit is sufficient.

John

John McDONALD I Detective Constable
SCD6 Economic and Specialist Crime OCU
Proceeds of Corruption Unit (PEPs)
Met Phone 62758 I Telephone +44 (0) 207 230 2758 Fax +44 (0)207 230 7458 I Mobile 07775 918999
Address New Scotland Yard, Room 552 Victoria Block, Broadway, London, SW1H 0BH

From: Jerome Basdeo [mailto:Jerome.Basdeo@tullowoil.com]
Sent: 14 November 2011 16:52
To: McDonald John - SCD6
Cc: Alasdair Murray; George Cazenove
Subject: Tullow Oil plc - Statements

Dear John,

Further to our conversation is it sufficient for the purposes of closing the MET's file on this matter, if we were to draft Mr Heavey's statement in the form of a sworn affidavit, or would you have to first conduct an interview with him?

The problem is that Mr Heavey will be in Africa from tomorrow evening until the end of next week and therefore if he needs to be interviewed, we would need to organise this as soon as possible.

Thanks,

Jerome

Jerome Basdeo
Legal and Corporate Support
Tullow Oil plc, 9 Chiswick Park, 566 Chiswick High Road, London, W4 5XT.
Direct: +44 (0)203 249 9726
Main Switchboard: +44 (0)203 249 9000

Email: jerome.basdeo@tullowoil.com

Consider our environment - please do not print this email unless absolutely necessary.

Tullow Oil plc

Building 9, Chiswick Park, 566 Chiswick High Road, London, W4 5XT
Tel: +44 (0)203 249 9000 Fax: +44 (0)208 994 5332

15 November 2011

RECORDED DELIVERY

Metropolitan Police Service
Economic & Specialist Crime Operational Command Unit
Proceeds of Corruption Unit
Room 552, Victoria Block
New Scotland Yard
London
SW1X 0BG
FAO: John McDonald

Dear Mr McDonald

Tullow Oil – East Africa Development Limited

I refer to your letter dated 14 November 2011 to my colleague, Jerome Basdeo.

Further to your formal request, and to enable you to close the file in relation to the above matter, I hereby enclose the original sworn affidavits of:

- Mr Aidan Joseph Heavey; and
- Dr. Brian William Glover.

Should you require any further information from Tullow, please do not hesitate to contact either Jerome or me.

I should also be grateful if you would confirm in writing once your department has closed the file in relation to the above matter and returned the relevant documentation to the Ugandan authorities.

Yours sincerely

Graham Martin

General Counsel of Tullow plc

Encs.

<u>IN RELATION TO DOCUMENTS PRODUCED AND TABLED BEFORE THE UGANDAN PARLIAMENT ON 10 AND 11 OCTOBER 2011</u>

AFFIDAVIT OF AIDAN JOSEPH HEAVEY

I, **AIDAN JOSEPH HEAVEY** of 9 Chiswick Park, 966 Chiswick High Road, London W4 5XT, United Kingdom, **STATE ON OATH** that:

1. I am the chief executive officer of Tullow Oil plc ("**Tullow**"), a UK company registered at the above address and the interested party in this matter.

2. I am also employed as a director of Tullow and am familiar with the company's business.

3. I make this affidavit supporting Tullow's unwavering position that documents tabled and produced before the Ugandan Parliament on 10 and 11 October 2011 are forgeries (the "**Forged Documents**").

4. On 10 October 2011 and 11 October 2011, the Ugandan Parliament conducted an open debate in relation to the regularisation of Uganda's oil sector and other matters incidental thereto, including agreements entered into between the Government of Uganda and various international oil companies (the "**Debate**").

5. During the course of the Debate, two Youth Members of Parliament for Western Uganda produced and tabled the Forged Documents which purported to show that Tullow transferred money to certain Ugandan Government Ministers and East Africa Development Ltd, via the Bank of Valletta p.l.c., a bank registered in Valletta, Malta (the "**Bank of Valletta**"). Copies of the Forged Documents can be found at pages 2 to 13 of AJH1.

6. The Forged Documents purport to show:

- a power of attorney purporting to be from me and containing a copy of my signature, dated 3 June 2010, addressed to the Bank of Valletta (the "**Power of Attorney**"). The Power of Attorney purports to authorise Brian Glover of Tullow Uganda Limited, to make payments in cash of up to 500,000 Euro to Sam Kahamba Kutesa, a representative of East Africa Development ltd. A copy of the Power of Attorney can be found at page 2 of AJH1;

- a Bank of Valletta transaction reference 53243325 dated 10 June 2010, in the sum of 1,500,000 EUR;

- a Bank of Valletta transaction reference 53243329 dated 21 June 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243413 dated 21 June 2010, in the sum of 1,500,000 EUR;

- a Bank of Valletta transaction reference 53243419 dated 06 July 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243534 dated 6 July 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243539 dated 6 July 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243716 dated 17 July 2010, in the sum of 3,500,000 EUR;

- a Bank of Valletta transaction reference 53243731 dated 17 July 2010, in the sum of 5,000,000 EUR;

- a Bank of Valletta transaction reference 53243934 dated 10 June 2010, in the sum of 1,500,000 EUR; and

- a Bank of Valletta transaction reference 53243217 dated 10 August 2010, in the sum of 3,000,000 EUR.

7. I did not draft, sign or send the Power of Attorney to the Bank of Valletta, nor did I instruct or authorise anyone to do this on my behalf. The Power of Attorney which purports to be signed by me is a forgery.

8. To the best of my knowledge and belief, Tullow does not have and has never had any business interest with East Africa Development ltd.

9. Neither Tullow, nor I, have ever given power of attorney to Brian Glover in respect of East Africa Development ltd.

10. Tullow does not hold, nor has it ever held, any bank accounts with the Bank of Valletta.

11. Tullow does not hold, nor has it ever held, any bank accounts with EFG Private Bank Limited.

12. Tullow does not hold, nor has it ever held, any bank accounts with EFG Eurobank Ergasius.

13. Therefore, the banks transfers which are purportedly evidenced by the documents at pages 3 to 13 of AJH1, never occurred.

14. I outlined the above facts on 11 October 2011 in a letter to Rt. Hon. Rebecca Kadaga, Speaker of the Parliament of Uganda (a copy of this letter can be found at page 14 of AJH1) (the "**Letter to the Speaker**").

15. In this Affidavit I now reaffirm and reiterate the content of my Letter to the Speaker.

SWORN by the said

AIDAN JOSEPH HEAVEY)
at LONDON)
)
)

this 15 day of NOVEMBER 2011

Before me,

....

Notary Public

Edward Young | Notary Public
152 Chiswick High Rd London
notary@youngedward.co.uk
+44 (0)20 8166 0720

Tullow Oil plc
1
AJ Heavey
AJH1
15 November 2011

IN RELATION TO DOCUMENTS PRODUCED AND TABLED BEFORE THE UGANDAN PARLIAMENT ON 10 AND 11 OCTOBER 2011

AFFIDAVIT OF
AIDAN JOSEPH HEAVEY

This is the exhibit marked "AJH1" referred to in the affidavit of **AIDAN JOSEPH HEAVEY**

SWORN this 15 day of November 2011

Before me,

....

Notary Public

Edward Young | Notary Public
152 Chiswick High Rd London
notary@youngedward.co.uk
+44 (0)20 8166 0720

Bank of Valletta p.l.c
50 Zachary St
Valletta [illegible]
Malta

3 June 20

Laid on Table by
Hon Karuhanga Gerald
11th Oct 2011

For attention: Chief Executive Officer

Dear Sir

LETTER OF POWER OF ATTORNEY TO Mr Brian Glover

We refer to the power of attorney registered,in your office on the 1st of June 2010, to specify tha Mr Brian Glover it is authorised to make payments in cash up to 500,000 Euro (five hundred thousand) to the introduced Representative of East Africa Development ltd, Sam Kahamba Kutes, born in Sembabule, Uganda the 1st of February 1949

Aidan Heavey
Chief Executive Officer
Tullow Oil plc.

1

2

Bank of Valletta p.l.c.

Transaction Reference
No.: 53243325

Payment to Third Parties

Printed by: Mr [illegible]
Printed at: 10.06.2010 11:30
Document Id: 72085536

Laid on Table by
Hon. Karuhanga Gerald
on 11th Oct 2011

From account	4003724201 9 (EUR)
Beneficiary account number	GB36EFGB17800000491740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC/SWIFT	EFGBGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of your account	1,500,000.00 6bn
Instructed amount in payment currency	1,500,000.00
Amount debited from your account	1,500,016.00
Amount credited to beneficiary	1,500,000.00
Exchange rate	1.000000
Payment details	Invoice 1 dated 9-06-10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Nairobi 00619
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	21/06/2010
Transaction charge	EUR 16.00
System message	Your instructions have been accepted and will be processed on 10/06/2010.
Result code	1001(20004)

13 OCT 2011

Bank of Valletta p.l.c

Transaction Reference No.: 53243329

Payment to Third Parties

Printed by Mr Brian Glover
Printed at 10 06 2010-12 20
Document Id 72085530

Tabled by Hon. Banyayanga Andrew on 11th Oct. 2011

From account	4003724201 9 (EUR)
Beneficiary account number	0034 450 537 007 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC SWIFT	IRVRTUS3N
Bank country is SEPA	No
Bank's country	Dubai - U A E
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account	500 000 00
Instructed amount in payment currency	500 000 00
Amount debited from your account	500 016 00
Amount credited to beneficiary	500 000 00
Exchange rate	1 000000
Payment details	Downpayment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Dubai P O Box 2923
Country	U A E
Beneficiary type	Individual
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	21/06/2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and will be processed on 10.06.2010
Result code	1011(20007)

Bank of Valletta p.l.c

Transaction Reference
No.: 53243413

Payment to Third Parties

Printed by: Mr Brian Clover
Printed at: 21 06 2010 00:30
Document Id: 72085550

Laid on Table by
Hon. Karuhanga Gerald
on 11th Oct. 2011

From account:	40037242019 (EUR)
Beneficiary account number	GB36EFGB17800000491740
IBAN:	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC/SWIFT	EFGDGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name.	East Africa Development Ltd
Instructed amount in currency of your account	1 500,000.00 6bn
Instructed amount in payment currency	1 500,000 00
Amount debited from your account	1 500.016 00
Amount credited to beneficiary	1.500,000 00
Exchange rate:	1 000000
Payment details	Invoice 2 dated 18-06-10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Nairobi 00619
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	08/07/2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and will be processed on 21/06/2010.
Result code	1017(20032)

6

⑫ Laid at Table by Hon Karuhanga Gerald on 10th OCT, 2011 — [signature] (SCA)

Bank of Valletta p.l.c

Transaction Reference No.: 53243419

Payment to Third Parties

Printed by Mr Brian Glover
Printed at 21 06 2010-10 01
Document Id 7208533

From account	4003724201 9 (EUR)
Beneficiary account number	0034 450 627 007 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC/SWIFT	IRVRTUS3N
Bank country is SEPA	No
Bank's country	Dubai - U.A.E
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account	500 000.00 2bn
Instructed amount in payment currency	500.000 00
Amount debited from your account	500.016 00
Amount credited to beneficiary	500.000 00
Exchange rate	1 000000
Payment details	Downpayment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Dubai P.O Box 2923
Country	U.A.E
Beneficiary type	Individual
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	06/07/2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and will be processed on 21/06/2010
Result code	1021120011

6

Bank of Valletta p.l.c.

Transaction Reference
No : 53243534

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 06/07/2010 11:5[illegible]
Document Id: 72085530

Laid on Table by
Hon. Karuhanga Gerald
on 11th Oct. 2011

From account	4003724201 9 (EUR)
Beneficiary account number	London branch Cash movement (Brian Glover)
IBAN	No
Currency of payment	EUR
Foreign bank name	Not-available
Bank's BIC SWIFT	Not-available
Bank country is SEPA	Not-available
Bank's country	United Kingdom
Beneficiary name	Not-available
Instructed amount in currency of your account	500,000.00 2bn
Instructed amount in payment currency	500,000.00
Amount debited from your account	500,016.00
Amount credited to beneficiary	500,000.00
Exchange rate	1.000000
Payment details	Not Available
Same day value payment	Yes
External Transaction Classification	Cash movement
Type of payment:	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1:	Not-available
City & Post Code.	Not-available
Country	Not-available
Beneficiary type	Not-available
Residence	Not-available
Future transfer date if applicable (DD/MM/YYYY):	17/07/2010
Transaction charge	EUR 16.00

System message.	Your instructions have been accepted and will be processed on 06/07/2010.
Result code.	1053(20064)

PARLIAMENT LIBRARY
P O BOX 7178 KAMPALA
13 OCT 2011
ACC NO.
CALL NO.

5

(11) Laid of Table by Hon Karuhanga Gerald on 10th Oct, 2011

(Sgd)

Bank of Valletta p.l.c

Transaction Reference No.: 53243539

Payment to Third Parties

Printed by Mr Brian Glover
Printed at 06 07 2010-15 20
Document Id 72085539

From account	
Beneficiary account number	40037242019 (EUR)
IBAN	0034 450 627 007 (EUR)
Currency of payment	No
Foreign bank name	EUR
Bank's BIC/SWIFT	Emirates Bank
Bank country is SEPA	IRVRTUS3N
Bank's country	No
Beneficiary name	Dubai - U A E
Instructed amount in currency of your account	Hilary Obaloker Onek
Instructed amount in payment currency	~~500.000 00~~ 2 bn
Amount debited from your account	500 000 00
Amount credited to beneficiary	500.016 00
Exchange rate	500 000.00
Payment details	1 000000
Same day value payment	Downpayment professional services
External Transaction Classification	Yes
Type of payment	Other Payments
Charges should be incurred by	OTHER PROFESSIONAL SERVICES
Address Line 1	Originator of payment
City & Post Code	Not-available
Country	Dubai P.O. Box 2923
Beneficiary type	U A E.
Residence	Individual
Future transfer date if applicable (DD/MM/YYYY)	Non-Resident
Transaction charge	17/07/2010
	EUR 16 00

System message	Your instructions have been accepted and will be processed on 06/07/2010
Result code	(06 1/20012)

8

Bank of Valletta p.l.c.

Transaction Reference
No.: 53243716

Payment to Third Parties

Printed by: Mr. Brian Glover
Printed at: 08.07.2010-11.03
Document Id: 72085539

Laid on Table by
Hon Karuhanga Gerald
on 11th Oct. 2011

From account	40037242019 (EUR)
Beneficiary account number	GB36EFGB17800000491740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC/SWIFT	EFGBGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of your account	3,500,000.00 14bn
Instructed amount in payment currency	3,500,000.00
Amount debited from your account	3,500,016.00
Amount credited to beneficiary	3,500,000.00
Exchange rate	1.000000
Payment details	Invoice 3 dated 8-07-10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Nairobi 00619
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16.00

System message	Your instructions have been accepted and will be processed on 08/07/2010
Result code	1078(20058)

No : 5[illegible]

Payment to Third Parties

[illegible]
[illegible]
[illegible]

Laid on Table by
Hon Karuhanga Gerald
on 11th Oct. 2011
[illegible]

From account	4000724201 9 (EUR)
Beneficiary account number	GB36EFGB17800000491740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC/SWIFT	EFGBGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of your account	5 000 000,00
Instructed amount in payment currency	5,000,000.00 [illegible]
Amount debited from your account	5 000,016.00
Amount credited to beneficiary	5,000,000.00
Exchange rate	1,000000
Payment details	Invoice 4 dated 12-07-10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Nairobi 00319
Country:	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16.00

System message:	Your instructions have been accepted and will be processed on 12/07/2010.
Result code	1084(20069)

PARLIAMENT LIBRARY
P O BOX 7178 KAMPALA
★ 13 OCT 2011 ★
ACC NO.........................
CALL NO.........................

3

Bank of Valletta p.l.c

Transaction Reference
No.: 53243934

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 12.07.2010-08:08
Document Id: 72085530

Laid on Table by
Hon. Karuhanga Gerald
11th Oct. 2011

From account	4003724201 9 (EUR)
Beneficiary account number	GB36EFGB17800000491740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC/SWIFT	EFGBGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of your account	5,000,000.00 22bn
Instructed amount in payment currency	5,000,000.00
Amount debited from your account	5,000,016.00
Amount credited to beneficiary	5,000,000.00
Exchange rate	1.000000
Payment details	Invoice 5 dated 16-07-10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Nairobi 00619
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16.00

System message	Your instructions have been accepted and will be processed on 16/07/2010
Result code	1091(20078)

2

13 OCT 2011

Bank of Valletta p.l.c

Transaction Reference No.: 53243217

Payment to Third Parties

Printed by: Mr Brian Glover
Printed at: 05 08 2010-09 34
Document Id: 72085530

Tabled by Hon. Baryayanga Andrew on 11th Oct. 2011 Stad (CA)

From account	4003704201 9 (EUR)
Beneficiary account number	0034 450 627 007 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC SWIFT	IRVRTUS3N
Bank country is SEPA	No
Bank's country	Dubai - U A E
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account	3 000 000 00
Instructed amount in payment currency	3 000 000.00
Amount debited from your account	3 000 016 00
Amount credited to beneficiary	3 000 000 00
Exchange rate	1 000000
Payment details	Downpayment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Dubai P O Box 2923
Country	U A E
Beneficiary type	Individual
Residence	Non-Resident
Future transfer date if applicable (DD-MM/YYYY)	10/08/2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and ll be processed on 05/08/2010
Result code	2907, 3003

[illegible]

Date	Time	Originating Account	Beneficiary account Number	Beneficiary Bank	Currency	Amount	Beneficiary Name	[illegible]	Type of Payment	[illegible]
[illegible]	09:37	[illegible]	London Branch Cash Movement (Brian Glover)		EUR	500,000.00	Not available		Other Professional [illegible]	[illegible]
[illegible]	11:46	[illegible]	GB[illegible]	EFG Private Bank Bank Ltd	EUR	1,200,000.00	East Africa Development Ltd	[illegible]	[illegible]	[illegible]
[illegible]	22:48	[illegible]	GB[illegible]	EFG Private Bank Bank Ltd	EUR	1,500,000.00	East Africa Development Ltd	[illegible]	[illegible]	[illegible]
[illegible]	14:55	[illegible]	London Branch Cash Movement (Brian Glover)		EUR	500,000.00			Other Professional [illegible]	
[illegible]	13:03	[illegible]	GB[illegible]	EFG Private Bank Bank Ltd	EUR	3,500,000.00	East Africa Development Ltd	[illegible]	Other Professional [illegible]	
17/07/2010	07:46	[illegible]	GB[illegible]	EFG Private Bank Bank Ltd	EUR	3,000,000.00	East Africa Development Ltd	[illegible]	Other Professional [illegible]	[illegible]
17/07/2010	06:08	[illegible]	GB[illegible]	EFG Private Bank Bank Ltd	EUR	3,000,000.00	East Africa Development Ltd	[illegible]	Other Professional [illegible]	[illegible]
				SUM	EUR	13,200,000.00				

Laid on Table by
Hon. Karuhanga Gerald
on 11th Oct. 2011

Tullow Oil plc

Building 9, Chiswick Park, 566 Chiswick High Road, London, W4 5XT
Tel: +44 (0)203 249 9000 Fax: +44 (0)203 249 8801

TULLOW plc

Rt. Hon. Rebecca Kadaga
Speaker Parliament of Uganda
P.O Box 7178,
Kampala, Uganda

11 October 2011

Dear Madam Speaker,

BRIBERY AND CORRUPTION ALLEGATIONS – PARLIAMENTARY SESSION OF 10 OCTOBER 2011

We are in the process of reviewing the groundless allegations made against Tullow, and certain of its employees, during yesterday's Parliamentary session. We wish to make the following preliminary statement for the public record:

1. Tullow Oil totally rejects the outrageous and wholly defamatory accusations of corruption made against the Company in the Ugandan Parliament yesterday. If these comments are repeated or made outside Parliament, Tullow will examine all possible legal action to protect the reputation of the company and its employees;

2. Reference was made during yesterday's debate to documentation which purportedly evidences payments made by Tullow to certain Government Ministers through a Maltese Bank. Tullow does not have and has never had any bank accounts in Malta. In addition, we can say with complete confidence that any documents that purportedly relate to transfers from Tullow accounts to Government Ministers are forgeries. We would urge the individuals in possession of these documents to provide them to Tullow and the appropriate Ugandan authorities as soon as possible;

3. A number of serious allegations were made about Tullow's operations in Uganda and the way the Company does business. These accusations are demonstrably false and appear to be founded on misunderstandings about how the global oil and gas industry works. Tullow would welcome the opportunity to appear at an appropriate forum in Parliament to refute these serious allegations and to explain, with other representatives from the industry, how the industry in which we are proud to work operates.

Tullow is deeply committed to its work in Uganda and operates to the highest standards of ethical behaviour. We take a zero tolerance approach to bribery and corruption and our policies are enshrined in our Code of Business Conduct. This code is in turn incorporated into all our contracts with employees, contract staff and industry partners.

Yours faithfully,

A.J. Heavey

Aidan Heavey
Chief Executive Officer

CC The Minister of Finance, Planning and Economic Development
The Minister of Energy and Mineral Development
The Minister for Ethics and Integrity

Registered in England and Wales: Number 3919249
Registered Office as above

IN RELATION TO DOCUMENTS PRODUCED AND TABLED BEFORE THE UGANDAN PARLIAMENT ON 10 AND 11 OCTOBER 2011

AFFIDAVIT OF DR. BRIAN WILLIAM GLOVER

I, **DR. BRIAN WILLIAM GLOVER** of 9 Chiswick Park, 966 Chiswick High Road, London W4 5XT, United Kingdom, **STATE ON OATH** that:

1. I am the Group Corporate Planning Manager of Tullow Oil plc ("**Tullow**"), a UK company registered at the above address and the interested party in this matter.

2. I was also previously employed as General Manager and Director of Tullow Operations Pty Limited and Tullow Uganda Limited.

3. I make this affidavit supporting Tullow's unwavering position that documents tabled and produced before the Ugandan Parliament on 10 and 11 October 2011 are forgeries (the "**Forged Documents**").

4. On 10 October 2011 and 11 October 2011, the Ugandan Parliament conducted an open debate in relation to the regularisation of Uganda's oil sector and other matters incidental thereto, including agreements entered into between the Government of Uganda and various international oil companies (the "**Debate**").

5. During the course of the Debate, two Youth Members of Parliament for Western Uganda produced and tabled the Forged Documents which purported to show that Tullow transferred money to certain Ugandan Government Ministers and East Africa Development Ltd, via the Bank of Valletta p.l.c., a bank registered in Valletta, Malta (the "**Bank of Valletta**"). Copies of the Forged Documents can be found at pages 2 to 13 of BWG1.

6. The Forged Documents purport to show:

- a power of attorney purporting to be from Aidan Heavey of Tullow and containing a copy of his signature, dated 3 June 2010 and addressed to the Bank of Valletta (the "**Power of Attorney**"). The Power of Attorney purports to authorise me to make payments in cash of up to 500,000 Euro to Sam Kahamba Kutesa, a representative of East Africa Development ltd. A copy of the Power of Attorney can be found at page 2 of BWG1;

- a Bank of Valletta transaction reference 53243325 dated 10 June 2010, in the sum of 1,500,000 EUR;

- a Bank of Valletta transaction reference 53243329 dated 21 June 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243413 dated 21 June 2010, in the sum of 1,500,000 EUR;

- a Bank of Valletta transaction reference 53243419 dated 06 July 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243534 dated 6 July 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243539 dated 6 July 2010, in the sum of 500,000 EUR;

- a Bank of Valletta transaction reference 53243716 dated 17 July 2010, in the sum of 3,500,000 EUR;

- a Bank of Valletta transaction reference 53243731 dated 17 July 2010, in the sum of 5,000,000 EUR;

- a Bank of Valletta transaction reference 53243934 dated 10 June 2010, in the sum of 1,500,000 EUR; and

- a Bank of Valletta transaction reference 53243217 dated 10 August 2010, in the sum of 3,000,000 EUR.

7. To the best of my knowledge and belief, Tullow does not have and has never had any business interest with East Africa Development ltd.

8. I have never received power of attorney from either Tullow, or Aidan Heavey, in respect of East Africa Development ltd.

9. Tullow does not hold, nor has it ever held, any bank accounts with the Bank of Valletta.

10. Tullow does not hold, nor has it ever held, any bank accounts with EFG Private Bank Limited.

11. Tullow does not hold, nor has it ever held, any bank accounts with EFG Eurobank Ergasius.

12. Therefore, the banks transfers which are purportedly evidenced by the documents at pages 3 to 13 of BWG1, never occurred.

SWORN by the said

DR BRIAN WILLIAM GLOVER)
at London)
)
)

this 15 day of NOVEMBER 2011

Before me,

....

Notary Public

Edward Young | Notary Public
152 Chiswick High Rd London
notary@youngedward.co.uk
+44 (0)20 8166 0720

Tullow Oil plc
1
BW Glover
BWG1
15 November 2011

IN RELATION TO DOCUMENTS PRODUCED AND TABLED BEFORE THE UGANDAN PARLIAMENT ON 10 AND 11 OCTOBER 2011

AFFIDAVIT OF
DR. BRIAN WILLIAM GLOVER

This is the exhibit marked "BWG1" referred to in the affidavit of **DR. BRIAN WILLIAM GLOVER**

SWORN this 15 day of November 2011

Before me,

....

Notary Public

Edward Young | Notary Public
152 Chiswick High Rd London
notary@youngedward.co.uk
+44 (0)20 8166 0720

Laid on Table by
Hon Karuhanga Gerald
11th Oct 2011
[illegible]

[illegible] Officer

Dear Sir

LETTER OF POWER OF ATTORNEY TO Mr Brian Glover

[illegible] of attorney registered, in your office on the 1st of June [illegible] [illegible] authorised to make payments in cash up to 500,000 Euro (five hundred thousand) to [illegible] Representative of East Africa Development ltd, [illegible] Uganda the 1st of February 1949

Aidan Heavey
Chief Executive Officer
Tullow Oil plc

Bank of Valletta p.l.c. | Transaction Reference No : 53243325

Payment to Third Parties

[illegible]
[illegible]
Document [illegible]

Laid on Table by Hon Karuhanga Gerald on 11th Oct 2011
[illegible]

From account	40037742019 (EUR)
Beneficiary account number	GB7EEFG51780000491740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC/SWIFT	EFGBGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of your account	1 500 000 00 6 [illegible]
Instructed amount in payment currency	1 500 000 00
Amount debited from your account	1 500 016 00
Amount credited to beneficiary	1 500,000 00
Exchange rate	1 000000
Payment details	Invoice 1 dated 9-06 10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Nairobi 00519
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD MM YYYY)	21/06/2010
Transaction charge	EUR 16 00
System message	Your instructions have been accepted and will be processed on 10/06/2010.
Result code	1001(20004)

Bank of Valletta p.l.c

Transaction Reference No : 53243329

Payment to Third Parties

[illegible]

Tabled by
Hon. Banyayanga Andrew
on 11th Oct 2011
[signature]

From account	40037042x (EUR)
Beneficiary account number	0034 450 637 007 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC/SWIFT	[illegible]RTUS3N
Bank country ISO code	[illegible]
Bank's country	Dubai U.A.E
Beneficiary name	Hilary Obaicker Onek
Instructed amount in currency of your account	500 000.00
Instructed amount in payment currency	500 000.00
Amount debited from your account	500 016.00
Amount credited to beneficiary	500 000.00
Exchange rate	1.000000
Payment details	Down payment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be paid by	Originator of payment
Address Line 1	Not available
City & Post Code	Dubai P.O. Box 7523
Country	U.A.E
Beneficiary type	Individual
Residence	Non Resident
Future transfer date (if applicable) (DD/MM/YYYY)	21/06/2010
Transaction charge	EUR 16.00

System message	Your instructions have been accepted and [illegible] 10 05 2010
Return code	[illegible]1120007

Transaction Reference No. 532424 [illegible]

Payment to Third Parties

[illegible]
Printed [illegible] 21/06/2010 [illegible]
[illegible]

Laid on Table by
Hon Karuhanga Gerald
on 11th Oct 2011

From account	4003724201 9 (EUR)
Beneficiary account number	GB36EFGB1780000049174C
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC SWIFT	EFGBGB2L
Bank country is SEPA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of [illegible] account	1 500 000.00
Instructed [illegible]	1 500 000.00
Amount debited from [illegible]	1 500 016.00
Amount equivalent to benef[illegible]	1 500,000.00
Exchange rate	1.000000
Payment details	Invoice 2 dated 18 06 10
Same day value payment	Yes
External Transaction Class[illegible]	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Nairobi 00519
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	06/07/2010
Transaction charge	EUR 16.00

System message	Your instructions have been accepted and will be processed on 21/06/2010
Result code	1017(20032)

Laid on Table by Hon. Kamanya Gerald
10th Oct 2011 — (SCN)

Bank of Valletta p.l.c

Transaction Reference
No.: 53243419

Payment to Third Parties

[illegible]

From account	40037242019 (EUR)
Beneficiary account number	0034 460 627 C07 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC/Swift	IRVRTUS3N
Bank country is SEPA	No
Bank's country	Dubai U A E
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account	500 000 00
Instructed amount in payment currency	500 000 00
Amount debited from your account	500 010 00
Amount credited to beneficiary	500 000 00
Exchange rate	1 000000
Payment details	Downpayment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Dubai P O Box 2523
Country	U A E
Beneficiary type	Individual
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	06/07/2010
Transaction charge	EUR 16 00

Customer message	Your instructions have been accepted and will be processed on 21/06/2010
[illegible]	[illegible]

Transaction Reference No [illegible]

Payment to Third Parties

Laid on Table by Hon Karuhanga Gerald on 11th Oct. 2011

[illegible]	[illegible]0037242615 (EUR)
Beneficiary account [illegible]	London branch Cash movement (Brian Glover)
IBAN	No
Currency of payment	EUR
Foreign bank name	Not-available
Banks BIC/SWIFT	Not-available
Bank country is SEPA	Not-available
Bank's country	United Kingdom
Beneficiary name	Not-available
Instructed amount in currency of [illegible] account	520 000 00 2bn
Instructed amount [illegible]	500 000 00
Amount debited from your account	500 018 00
Amount credited to beneficiary	500 000 00
Exchange rate	1 000000
Payment details	Not Available
Same day value payment	Yes
External Transaction Classification	Cash movement
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not-available
City & Post Code	Not-available
Country	Not-available
Beneficiary type	Not-available
Residence	Not-available
Future transfer date if applicable (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and will be processed on 06/07/2010
Result code	1053(20061)

Bank of Valletta p.l.c

Transaction Reference No : 53243539

Payment to Third Parties

[illegible]
[illegible]
[illegible]

From account	40037243019 (EUR)
Beneficiary account number	0034 450 527 007 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC SWIFT	IRVRTUS3N
Bank country is SEPA	No
Bank's country	Dubai U A E
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account	500 000 00 2 1
Instructed amount in payment currency	500 000 00
Amount debited from your account	500 016 00
Amount credited to beneficiary	500 000 00
Exchange rate	1 000000
Payment details	Com payment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Dubai P O Box 2923
Country	U A E
Beneficiary type	Individual
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and will be processed on 05/07/2010
Result code	[illegible]

[illegible]

Transaction Reference No [illegible]

Payment to Third Parties

[illegible]

Laid on Table by Hon Karuhanga Gerald on 11th Oct 2011 [signature]

From account	4003724201 9 (EUR)
Beneficiary account number	GB38EFGB17600000491740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC SWIFT	EFGBGB2L
Bank country is EEA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of your account	3,500,000.00 1-7bn
Instructed amount for payment currency	3,500,000.00
Amount debited from your account	3,500,016.00
Amount credited to beneficiary	3,500,000.00
Exchange rate	1.000000
Payment details	invoice 3 dated 6.07.10
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be paid by	Originator of payment
Address line 1	Not available
City & Post Code	Nairobi 00610
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16.00

System message	Your instructions have been accepted and will be processed on 05/07/2010
Result code	1078(2DJ56)

34

Payment to Third Party [illegible]

[illegible]

Laid on Table by Hon Karuhanga Gerald on 11th Oct 2011
Sad

From account	4002724201 9 (EUR)
Beneficiary account number	GB30EFGE1780000049 1740
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private Bank Ltd
Bank's BIC/SWIFT	EFGEGB2L
Bank country is EEA	Yes
Bank's country	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in [illegible] account	5 000 000.00
Instructed amount in [illegible]	~~5 000 000.00~~ 22bn
Amount debited [illegible]	5 000 016.00
Amount credited to beneficiary	5.000 000.00
Exchange rate	1.000000
Payment details	invoice 4 dated 12-07-10
Same day [illegible] payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Nairobi 00519
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non Resident
Future transfer date if applicable (DD/MM/YYYY)	12/07/2010
Transaction charge	EUR 16.00

System message — Your instructions have been accepted and will be processed on 12/07/2010

Result code — 1054(20069)

Transaction Reference No: 5324393[illegible]

Payment to Third Parties

Laid on Table by Hon Karuhanga Gerald 11th Oct 2011

From account	4600724201 8 (EUR)
Beneficiary account number	GB26EFGB17[illegible]
IBAN	Yes
Currency of payment	EUR
Foreign bank name	EFG Private bank Ltd
Bank's BIC number	EFGFGB2L
Bank country [illegible]	Yes
Bank's code	United Kingdom
Beneficiary name	East Africa Development Ltd
Instructed amount in currency of the account	5,000,000.00 22bn
Instructed amount in payment currency	5,000,000.00
Amount to be debited to your account	5,000,016.00
Amount received by the beneficiary	5,000,000.00
Exchange rate	1.000000
Payment details	Invoice 5 dated 16-07-10
Same day value payment	Yes
External Transaction Charges	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be incurred by	Originator of payment
Address Line 1	Not available
City & Post Code	Nairobi 00619
Country	Kenya
Beneficiary type	Commercial Entity
Residence	Non-Resident
Future transfer date (if applicable) (DD/MM/YYYY)	17/07/2010
Transaction charge	EUR 16.00

System message	Your instructions have been accepted and will be processed on 16/07/2010
Result code	1051(20078)

Bank of Valletta p.l.c

Transaction Reference
No : 53243217

Payment to Third Parties

Tabled by
Hon Baryayanga Andrew
on 11th Oct 2011
(CA)

From account	4000724201 9 (EUR)
Beneficiary account number	0034 450 627 007 (EUR)
IBAN	No
Currency of payment	EUR
Foreign bank name	Emirates Bank
Bank's BIC SWIFT	RVRTUS3N
Bank country in SEPA	No
Bank's country	Dubai U A E
Beneficiary name	Hilary Obaloker Onek
Instructed amount in currency of your account	3 000 000 00
Instructed amount in payment currency	3 000 000 00
Amount debited from your account	3 000 016 00
Amount credited to beneficiary	3 000 000 00
Exchange rate	1 000000
Payment details	Do payment professional services
Same day value payment	Yes
External Transaction Classification	Other Payments
Type of payment	OTHER PROFESSIONAL SERVICES
Charges should be covered by	Originator of payment
Address Line 1	Not available
City & Post Code	Dubai P O Box 2923
Country	U A E
Beneficiary type	Individual
Residence	Non-Resident
Future transfer date if applicable (DD/MM/YYYY)	10/06 2010
Transaction charge	EUR 16 00

System message	Your instructions have been accepted and will be processed on 05 05 2010
Return code	(007-3000)

Laid on Table by Hon Karuhanga Gerald on 11th Oct 2011

METROPOLITAN POLICE

METROPOLITAN POLICE SERVICE

Economic & Specialist Crime Operational Command Unit
Proceeds of Corruption Unit
Room 552, Victoria Block;
New Scotland Yard
London SW1X 0BG

Telephone: 0044 207-230-2758
Facsimile: 0044 207-230-7458
e-mail: **john.mcdonald1@met.pnn.police.uk**

Your reference:

Our reference: MLIEO2011UGAN1201323

Date: 24th November 2011

Mr.Graham Martin
Tullow Oil
Building 9, Chiswick Park,
566 Chiswick High Road
London, W4 5XT

Dear Mr Martin,

I refer to your letter of the 15th November 2011. I confirm receipt of the original sworn affidavits of Mr. Aidan Joseph Heavey and Dr. Brian William Glover and their exhibits.

I am able to state that these documents have been taken by hand to the Home Office along with a closing report. These documents will now be transmitted to the authorities in Uganda.

This matter is now complete.

Yours faithfully

John McDonald
Detective Constable

Tullow Oil plc
9, Chiswick Park, 566 Chiswick High Road, London, W4 5XT
Tel: +44 (0)203 249 9000 Fax: +44 (0)203 249 8801

Ivan Royle, Esq,
Managing Director,
Corporate Affairs,
Bank of New York Mellon,
160 Queen Victoria Street
London EC4V 4LA

1st December 2011

Dear Mr. Royle,

Further to our telephone discussions regarding allegations made in Uganda about Tullow Oil and the Bank of New York Mellon, would it be possible for you to send me by letter a copy of the statement that you have made to the Ugandan press. We have issued the statement below to the Ugandan press and the international wire services.

"These are yet more unfounded allegations from the same group of MPs whose previous claims have been comprehensively discredited. For the record, Tullow does not have any accounts with Bank of New York Mellon and has not made any payments to these or any other individuals through this bank or any other bank."

I hope very much that these statements will bring an end to this matter.

Yours sincerely,

George Cazenove

Head of Media Relations
Tullow Oil plc,
9 Chiswick Park,
566 Chiswick High Road,
London, W4 5XT

Jerome Basdeo

From: George Cazenove
Sent: 01 December 2011 11:41
To: Jerome Basdeo
Cc: Alasdair Murray
Subject: FW: Uganda
Attachments: BNYM letter 011211.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Not sure they are going to make a statement now....but they are happy for us to write to them.

See below.

George

From: ivan.royle@bnymellon.com [mailto:ivan.royle@bnymellon.com]
Sent: 01 December 2011 11:39
To: George Cazenove
Cc: wim.hautekiet@bnymellon.com
Subject: RE: Uganda

Dear George,
It is fine for your lawyers to contact our deputy general counsel as per your request below. His name is Wim Hautekiet (wim.hautekiet@bnymellon.com)
Regards,
Ivan.

From: George Cazenove <george.cazenove@tullowoil.com>
To: "ivan.royle@bnymellon.com" <ivan.royle@bnymellon.com>
Date: 01/12/2011 10:09
Subject: RE: Uganda

Dear Ivan,

I just called you...I have sent you a letter (attached) in today's post asking that you send me a hard copy of the statement you have made to the press re: allegations in Uganda. If you have decided to ignore this whole affair and have not issued a statement – which would be understandable given the ludicrousness of the allegations - do you think it would be possible for one of our lawyers to write to BNY MEllon ask for written confirmation that Tullow and BNY Mellon do not have a banking relationship?

Many thanks,
George

From: ivan.royle@bnymellon.com [mailto:ivan.royle@bnymellon.com]
Sent: 30 November 2011 19:37
To: George Cazenove
Subject: Re: Uganda

Thanks George.

Ivan Royle
Managing Director
Corporate Affairs
BNY Mellon
Wk: +44 (0)207 163 3230
Mbl: +44 (0)7730 900 294

From: George Cazenove [george.cazenove@tullowoil.com]
Sent: 30/11/2011 17:26 GMT
To: Ivan Royle
Subject: RE: Uganda

Yes we do.

I'd send your statement to:

bariyonic@yahoo.co.uk (Dow Jones, Kampala)
john.biers@dowjones.com (Energy Editor, EMEA)
fojambo@bloomberg.net (Bloomberg, Kampala)
pmrichardson@bloomberg.net; (Bloomberg, Kenya)
tom.bergin@reuters.com (Energy, Reuters)
Elias.Biryabarema@reuters.com (Reuters, Kampala)
ikasita@newvision.co.ug; (New Vision)
editorial@newvision.co.ug
editorial@ug.nationmedia.com; (Daily Monitor)
jnjoroge@ug.nationmedia.com
amwenda@independent.co.ug (Ugandan Independent)
hbogere@observer.ug (Ugandan Observer)
skakaire@observer.ug

From: ivan.royle@bnymellon.com [mailto:ivan.royle@bnymellon.com]
Sent: 30 November 2011 16:18
To: George Cazenove
Subject: RE: Uganda

Do you have a contact list of local publications? Uganda is somewhat off the beaten track for our media team...
Ivan

From: George Cazenove <george.cazenove@tullowoil.com>
To: "ivan.royle@bnymellon.com" <ivan.royle@bnymellon.com>
Date: 30/11/2011 15:52
Subject: RE: Uganda

Hi Ivan,

We have issued the comment pasted below in Uganda. It's hasn't been published by anyone yet as its effect has been to kill the story with any major newspapers – which the Red Pepper is not.

If I may suggest, your quote could be open to interpretation in Uganda. I don't think it would be understood that you are saying that BNY Mellon don't make payments to individuals. Essentially it pays in Uganda to spell things out very, very clearly.

George

'These are yet more unfounded allegations from the same group of MPs whose previous claims have been comprehensively discredited. For the record, Tullow does not have any accounts with Bank of New York Mellon and has not made any payments to these or any other individuals through this bank or any other bank .'

From: ivan.royle@bnymellon.com [mailto:ivan.royle@bnymellon.com]
Sent: 30 November 2011 15:39
To: George Cazenove
Subject: Fw: Uganda

Hello George,
Have you issued any statements yet and if so to who? We have one in draft at the moment - please don't distribute too widely as it may change.

"BNY Mellon offers an investment service to banks and other institutional investors in which we simply act as an intermediary between such institutions. BNY Mellon does not have a banking relationship with Tullow Oil."

Regards,
Ivan

Ivan Royle, Managing Director • BNY Mellon
Corporate Affairs · Tel +44.(0)207.163.3230 · Mobile +44.(0)7730.900.294 · ivan.royle@bnymellon.com

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

The information contained in this e-mail, and any attachment, is confidential and is intended solely for the use of the intended recipient. Access, copying or re-use of the e-mail or any attachment, or any information contained therein, by any other person is not authorized. If you are not the intended recipient please return the e-mail to the sender and delete it from your computer. Although we attempt to sweep e-mail and attachments for viruses, we do not guarantee that either are virus-free and accept no liability for any damage sustained as a result of viruses.

Please refer to http://disclaimer.bnymellon.com/eu.htm for certain disclosures relating to European legal entities.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

---

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

---

The information contained in this e-mail, and any attachment, is confidential and is intended solely for the use of the intended recipient. Access, copying or re-use of the e-mail or any attachment, or any information contained therein, by any other person is not authorized. If you are not the intended recipient please return the e-mail to the sender and delete it from your computer. Although we attempt to sweep e-mail and attachments for viruses, we do not guarantee that either are virus-free and accept no liability for any damage sustained as a result of viruses.

Please refer to http://disclaimer.bnymellon.com/eu.htm for certain disclosures relating to European legal entities.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

---

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

---

The information contained in this e-mail, and any attachment, is confidential and is intended solely for the use of the intended recipient. Access, copying or re-use of the e-mail or any attachment, or any information contained therein, by any other person is not authorized. If you are not the intended recipient please return the e-mail to the sender and delete it from your computer. Although we attempt to sweep e-mail and attachments for viruses, we do not guarantee that either are virus-free and accept no liability for any damage sustained as a result of viruses.

Please refer to http://disclaimer.bnymellon.com/eu.htm for certain disclosures relating to European legal entities.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit http://www.symanteccloud.com

---

Fenech & Fenech
ADVOCATES

2 December, 2011

MR JEROME BASDEO
LEGAL AND CORPORATE SUPPORT
TULLOW OIL PLC,
9 CHISWICK PARK,
566 CHISWICK HIGH ROAD,
LONDON, W4 5XT,
ENGLAND

Dear Mr Basdeo,

Attached please find my affidavit dated 2 December, 2011 with document attached.

Kind regards,

DR NICOLAI VELLA FALZON

198, Old Bakery Street, Valletta VLT 1455, Malta. Tel: (+356) 2124 1232 Fax: (+356) 2599 0692
Email: info@fenlex.com Website: www.fenechlaw.com

AFFIDAVIT

I, the undersigned, **NICOLAI VELLA FALZON LL.M. (LOND.), LL.D.** holder of Maltese Identity Card Number 114474(M), an advocate practising at Fenech & Fenech Advocates of 198 Old Bakery Street, Valletta, Malta do hereby declare and confirm on oath the following:

1. That I am duly warranted to practise as an advocate in terms of Maltese law and this in terms of a warrant issued on the 21st day of January, 1999 by the President and the Prime Minister of the Republic of Malta and that I have practised in this capacity for more than thirteen years as an advocate in the Courts of Malta. I hold a doctorate degree in law (LL.D.) from the University of Malta and a Masters degree in law (LL.M.) from the University of London and have been a partner of Fenech & Fenech Advocates since 2004;

2. That on the 2nd December, 2011 I did attend the office of the Attorney General in Malta and did speak to Dr Donatella Frendo Dimech who Heads the *International Co-Operation in Criminal Matters Unit*;

3. That Dr Frendo Dimech did deliver to me the attached certified true copy of a letter dated 21 June, 2011 issued by Inspector Maurice Curmi from the Economic Crime Unit of the Malta Police;

4. That Dr Frendo Dimech did confirm to me that on 1 December, 2011 Inspector Maurice Curmi did attend on her and signed and certified the attached letter as a true copy of the original letter issued by himself on 21 June, 2011 and that Dr Frendo Dimech herself witnessed the signature of the true copy by Inspector Curmi. Dr Frendo Dimech confirmed that she applied her stamp and signature attesting to this on 1 December, 2011;

5. That I therefore confirm that in terms of Maltese law there is no doubt that the attached letter is a true copy of the original letter issued by Inspector Maurice Curmi on 21 June, 2011.

DR NICOLAI VELLA FALZON
I.D. 114474M

Sworn before me this 2nd day of December 2011 by Advocate Doctor Nicolai Vella Falzon, holder of identity card number one, one, four, four, seven, four, letter M, (114474M)

KATRINA ZAMMIT CUOMO LLB., L.P.
LEGAL PROCURATOR & COMMISSIONER FOR OATHS
Fenech & Fenech Advocates
198, Old Bakery Street,
Valletta, Malta

All communications should be addressed to the Commissioner of Police, and not to individual Officers, by name or appointment

Malta.

Laid on Table by
Hon Kutesa Sam
11th Oct. 2011

21 Jun. 2011

The Attorney General
Office of the Attorney General
The Palace
Valletta, Malta

Attn: Dr. Donatella Frendo Dimech. LL.D

Re: Letter Rogatory received from Uganda bearing reference number PRO/68.1

With reference to the Letter Rogatory from Uganda dated 4 April 2011. Consequently, Bank of Valletta p.l.c., (BOV) was requested to furnish this end with all the information requested by the Ugandan Authorities. BOV was also furnished with a copy of all the alleged transactions for verification. Subsequently, a thorough and lengthy search was conducted by the mentioned bank staff, which unfortunately yielded negative results.

Therefore it was concluded without any doubt that the companies and persons mentioned in the Letter Rogatory do not hold any accounts with BOV and the transactions receipt submitted are forgeries as no such transfer of monies had ever taken place.

Attached herewith is the official letter received from Bank of Valletta regarding the search carried out.

Hope that the information provided above will help you in your investigation.

Regards.

Insp. Maurice Curmi
21 JUN 2011
MALTA POLICE

Insp. Maurice Curmi
Economic Crime Unit
Malta Police

True copy of original
1.12.11

~~Sworn and signed before me~~
at the Attorney General's Office
The Palace, Valletta, Malta
this 1st day of December 2011

Dr. D. Frendo Dimech LL.D.
Commissioner for Oaths

BNY MELLON

George Cazenove, Esq,
Head of Media Relations,
Tullow Oil plc,
9 Chiswick Park,
566 Chiswick High Road,
London, W4 5XT

6th December 2011

Dear Mr Cazenove,

Further to your letter of the 1st December regarding media allegations in Uganda, please find enclosed a copy of the statement that BNY Mellon issued to the Ugandan press in wire services on the 1st December 2011.

"The Bank of New York Mellon offers an investment service to banks and other institutional investors in which we simply act as an intermediary between such institutions. The Bank of New York Mellon does not have a banking relationship with Tullow Oil."

I also hope that this will see the end of this matter,

Yours sincerely,

Ivan Royle

Managing Director
Corporate Affairs
BNY Mellon
160 Queen Victoria Street
London, EC4V 4LA

CODE OF BUSINESS CONDUCT

CODE OF BUSINESS CONDUCT

CONTENTS

A PERSONAL MESSAGE FROM AIDAN HEAVEY, CHIEF EXECUTIVE OFFICER

Dear Colleagues,

August 2011

I am pleased to introduce this new edition of the Tullow Code of Business Conduct ("The Code"). The Code has been revised to include additional requirements and guidance. It is effective from the above date and replaces all earlier versions.

Our reputation with our investors, partners, customers and those communities of which we are part is based upon our collective behaviour as a company. Everyone who works for, or on behalf of, Tullow contributes to our good reputation and success.

I expect our employees and all those who work on our behalf to exercise good judgement and common sense while carrying out our business activities. Each one of us is personally responsible for living our values, following the Code and ensuring that our day-to-day business activities are conducted safely and in a fair, honest and ethical manner.

Those of you who are managers assume an additional responsibility to develop a working environment which encourages compliance and the adoption of good business practice. You must lead by example and ensure that those who report to you understand the Code and follow it in their work for Tullow.

I encourage everyone to promptly report any concerns you may have about our business practices or where you know or suspect that the Code has been breached. Concerns can be raised with your own line manager or via 'Speaking Up' the independent, confidential reporting line, details of which are contained in this Code. Tullow will not tolerate retaliation against employees who raise concerns in good faith.

Finally, I ask you all to take the time to read the Code carefully, share it with those who work with us and refer any questions to your line manager.

Yours sincerely,

Aidan J Heavey

Aidan Heavey, Chief Executive Officer

OUR VALUES

Focus on Results
Strong sense of focus on results, driving tasks and projects through to completion with the flexibility to adapt to changing situations

Integrity and Respect
Work with integrity and with respect for people, and for the environments in which we operate

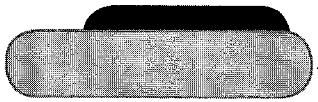
Commitment to Tullow and Each Other
Work in a collaborative manner, empowering ourselves and others, whilst taking responsibility for our actions

Entrepreneurial Spirit and Initiative
Maintain our entrepreneurial and creative spirit as we challenge ourselves to develop the business and ourselves

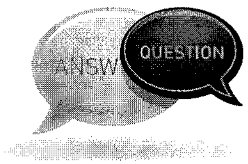
HOW THIS CODE APPLIES TO YOU

How to Use this Code

The Code clearly sets out our expectations and you should ensure that you understand how it applies to you and your work activities. There will be additional regulations, policies and other procedural requirements that you will need to follow and you should ensure that you are aware of these..The Code cannot describe every possible scenario but it does provide guidance on the various topics. To assist you, key sections are as follows:-


Key Requirement


Further Guidance



Questions and Answers

Who does this Code apply to?

The Code applies to the Board of Directors, all full or part time staff ('Employees') and contract, agency or temporary staff ('Contract Staff'). The Code also applies to Tullow's affiliated companies and controlled joint ventures.

Additionally, all third party contractors, agents, advisors, consultants or other business associates ("Industry Partners") must follow the principles of this Code when they work with, or on behalf of us.

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

Advice and Guidance

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

KEY REQUIREMENT

Always seek help if you are not sure of what action to take.

Personal Responsibility

As an Employee of Tullow it is your personal responsibility to act in accordance with the requirements set out in this Code of Business Conduct. Please read the Code carefully and refer to it when you are uncertain of the correct action to take. You must understand, promote and apply this Code to your conduct and work with Tullow.

If you suspect or become aware of any violation of the Code or have concerns that some activities carried out by others may breach the Code, you should report your concern. If you ignore or condone breaches of the Code then you are not acting in the best interests of Tullow. **We welcome and encourage reporting of any concerns you have about Tullow activities or practices which are, or appear to be, in breach of this Code.**

HOW THIS CODE APPLIES TO YOU - continued

Personal Responsibility - continued

KEY REQUIREMENT

Everybody has a responsibility for compliance and promoting the Code.

The Duty of Managers

Those of you who are managers have an additional responsibility to ensure that this Code is applied to our business and in particular,

You must ensure that:

- all staff who report to you have a copy of the Code and have been trained in its application;
- you support staff who, in good faith, raise questions or concerns;
- you demonstrate your personal commitment to the Code and lead by example;
- you monitor the application of the Code and ensure consistent enforcement;
- you ensure that all reports of violations are appropriately investigated;
- business processes in your area of responsibility comply with the Code.

KEY REQUIREMENT

Managers must lead by example.

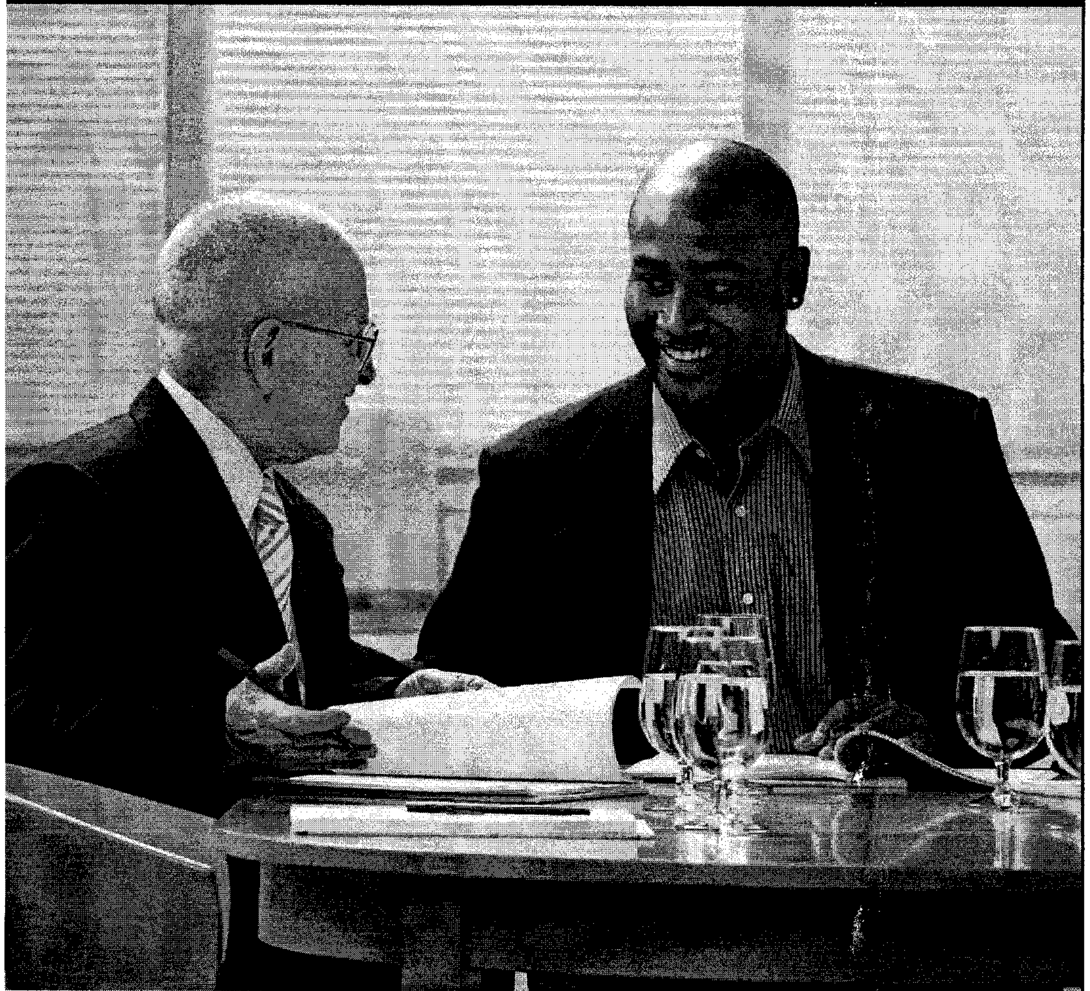
Breaches of the Code

Failure to comply with the Code may lead to disciplinary action up to and including dismissal or, in the case of Contract Staff or Industry Partners, cancellation of contract.

Monitoring & Audit

The Group Compliance Manager will oversee the monitoring of the application of this Code and business units will be subject to periodic audits of compliance. The Tullow Compliance Committee will monitor progress and the effectiveness of the compliance programme and will report periodically on the status of implementation and compliance to the Board of Directors.

WE COMPLY WITH ALL APPLICABLE LAWS



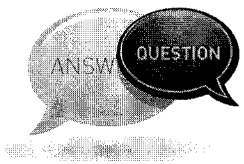
Compliance with Laws

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

Trading in Shares

Buying or selling publicly traded shares where you are aware of "inside" information which is not yet publicly disclosed, or passing such information to others, is called insider trading and is illegal and prohibited by Tullow. This applies whether share transaction is made directly or through another person.

There are periods when dealings in Tullow Oil plc shares by Employees or Contract Staff are not permitted. Further information is available in the relevant Employee Handbook and if you are in any doubt as to your ability to trade or deal in the shares of Tullow Oil plc you should contact the General Counsel or Deputy Company Secretary.



Question: I have been working at a Tullow well site where we have recently made a significant discovery. This discovery is not yet public knowledge but when it is announced I think it will have a positive affect on Tullow's share price. Can I buy some Tullow shares to take advantage of this opportunity?

Answer: No, this information is confidential and as it has not been made public it is 'inside information' so you cannot buy, or advise others to buy, shares in Tullow or in any other company that has an interest in the discovery.

Trade Restrictions and Export Controls

Some countries impose restrictions on exports and other business dealings with other countries, entities and individuals. The laws and regulations governing these restrictions are complex and subject to change. If you are responsible for the export or re-export of any items, (including equipment, materials, software or services), you must be aware of these restrictions and ensure they are complied with.

KEY REQUIREMENT

Ensure that you are aware of the laws which are applicable to your area of business.

WE ARE COMMITTED TO HIGH ENVIRONMENT, HEALTH AND SAFETY STANDARDS

The health and safety of people and the protection of the natural environment in which we operate are critical business considerations for Tullow. We apply significant effort in managing our EHS risks and achieving our EHS objectives.

Environment

We work with respect for the environment in which we operate and we identify, assess and manage our environmental risks. We set, and seek to achieve, targets that promote the efficient use of resources to reduce and prevent pollution and protect biodiversity. At all times we seek to engage openly and honestly with our stakeholders, and particularly with those people affected by our operations.

We meet applicable legal standards for all aspects of environmental management and where legal requirements do not exist, or they are considered inadequate, we apply responsible standards.

ANSW QUESTION

Question: We had a small diesel spill on the ground – just a few litres. Do I have to report it?

Answer: Yes, all spills or releases of hydrocarbons or chemicals need to be reported to your supervisor or manager as soon as you become aware. This will enable us to report to regulatory agencies where required and carry out an investigation to determine the root cause and implement corrective actions.

Health and Safety

We are committed to achieving high standards of health and safety performance as we believe that all accidents, occupational illnesses and injuries are preventable. Our priority is to ensure that all our people – regardless of where they work or what they do – return home safely and well at the end of every working day.

Health and safety practices are governed by EHS policies which apply to all personnel and, in addition, businesses may create local procedures which you should follow. Tullow provides a safe place to work and you have a personal responsibility to ensure that you are competent and appropriately trained to undertake your work activities.

You must:

- immediately stop any work that appears to be unsafe ;
- comply with the requirements of our environmental, health and safety procedures, and assist those working with you to do the same;
- ensure you identify, assess and take steps to control environmental, health and safety hazards associated with your work;
- use the personal protective equipment required for the task you are undertaking;
- handle, transport and arrange for the disposal of raw materials, products and wastes in a safe, environmentally and socially responsible manner;
- engage regularly, openly and honestly with our stakeholders, and particularly those people affected by our operations, and take their views into account in our decision-making;
- make sure you know what to do if an emergency occurs at your workplace and that visitors are familiar with emergency procedures;
- report to your manager any accident, injury, illness, unsafe or unhealthy condition, incident, spill or release of material to the environment so that appropriate action can be taken to prevent, correct or control those conditions.

KEY REQUIREMENT

You should always follow the Tullow Safety Rules.

WE ARE COMMITTED TO HIGH ENVIRONMENT, HEALTH AND SAFETY STANDARDS - continued

Health and Safety - continued

You must not:

- undertake work unless you are trained, competent, medically fit and sufficiently rested and alert to do so;
- undertake work when your performance is impaired by alcohol or other drugs, legal or illegal, prescribed or otherwise;
- ignore a potential or actual EHS incident or assume that someone else will report it.

KEY REQUIREMENT

STOP any work that becomes unsafe.

ANSWER QUESTION

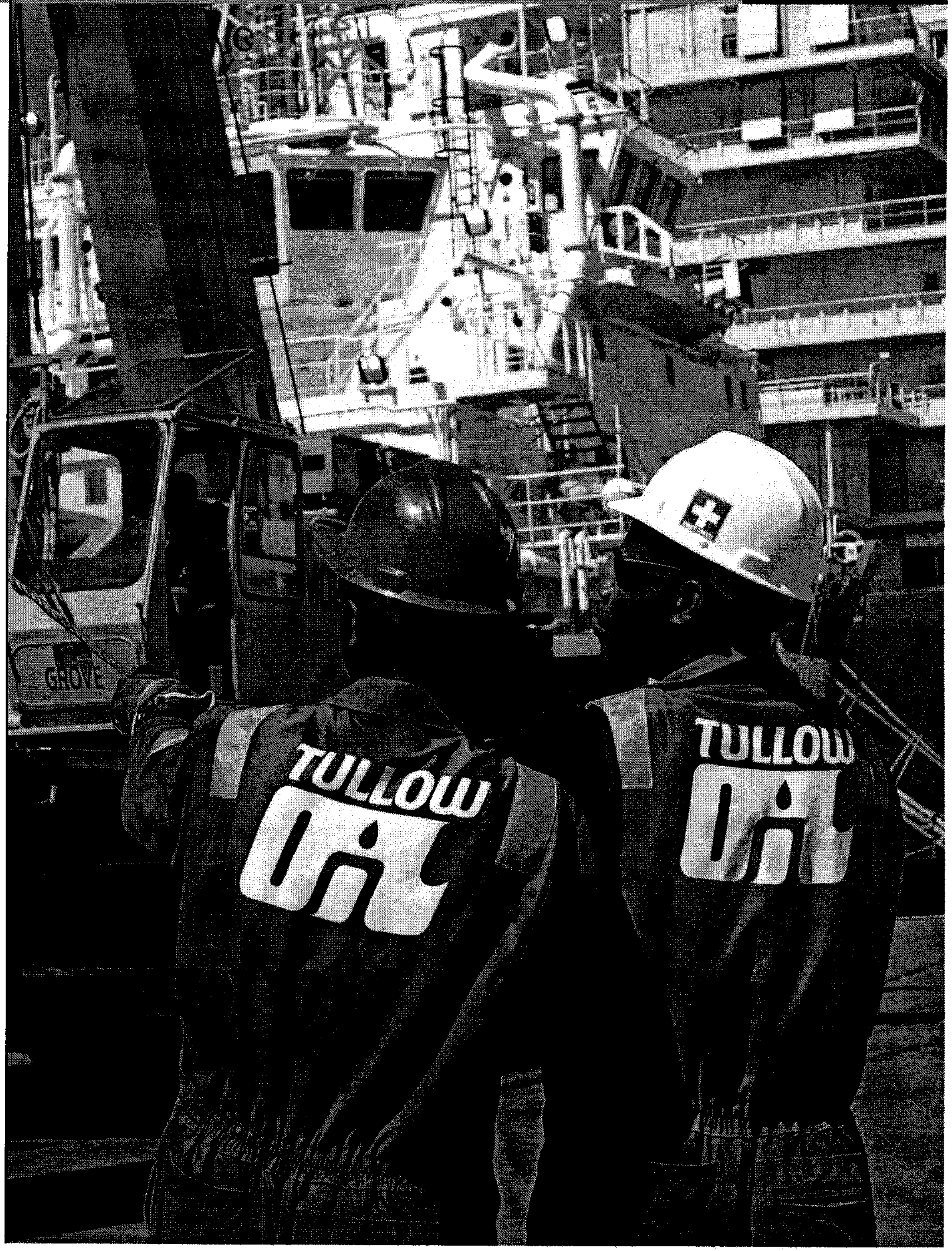
Question: My supervisor demands that we meet project schedules that I believe can only be achieved by breaking EHS policy. What should I do?

Answer: EHS policy must be followed and breaching this to achieve project schedules is unacceptable. You should first consider discussing the situation with your supervisor. If you are uncomfortable doing this or are still concerned that policy may be breached you should speak to your local EHS Manager or report it using the confidential reporting line (Safecall).

Security

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

Read the EHS policy and relevant guidance on the Tullow intranet.



WE TREAT EMPLOYEES, INDUSTRY PARTNERS AND LOCAL COMMUNTITES FAIRLY AND WITH RESPECT

Fair Employment Practices

We are committed to eliminating discrimination and encouraging diversity amongst our workforce. We treat all of our Employees, whether full time, part time or temporary, fairly and with respect. Decisions related to recruitment selection, development or promotion are based upon merit and must not be influenced by factors such as gender, marital status, race, ethnic origin, colour, nationality, disability, religion, sexual orientation or age.

Workplace Conduct

We will not tolerate abuse or harassment of any kind whether directed at Employees, Contract Staff, Industry Partners or others. Harassment includes any unwanted conduct that has the effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment,

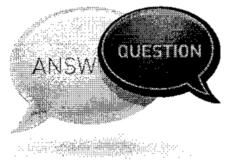
You must not:

- engage in sexual harassment – i.e. unwelcome sexual advances, requests for sexual favours, physical contact or repeated sexual suggestions;
- behave in any way that could be viewed as offensive, intimidating, malicious or insulting;
- create or support a hostile or intimidating work environment including one in which Employees may feel forced to engage in inappropriate work practices in order to 'be accepted';
- humiliate, denigrate or injure another person;
- make racial, ethnic, religious, age-related, or sexual jokes or insults;
- distribute or display offensive material, including inappropriate images.

Privacy of Personal Information

We will maintain the confidentiality of all Employee personal information. Access to Employee personal information is restricted to Tullow Employees who are authorised and who have a business need for that information. Some countries (e.g. European Union member countries) have Data Protection Laws that restrict the transfer of Employee personal information outside of the country of origin. All Employees who are responsible for the maintenance of Employee personal information must ensure that they are aware of and comply with these laws and take appropriate steps to protect the information.

Consult your Employee Handbook or your HR contact for further information.



Question: A colleague in our office frequently circulates jokes which often have racial or sexual undertones. Some of us in the office are offended by these emails – what should I do?

Answer: You could talk to the person to tell them that it is inappropriate. However, if you are uncomfortable doing that or the person ignores this advice then you should report it to your manager or HR representative.

WE DO NOT MAKE OR ACCEPT ANY ILLEGAL PAYMENTS

KEY REQUIREMENT

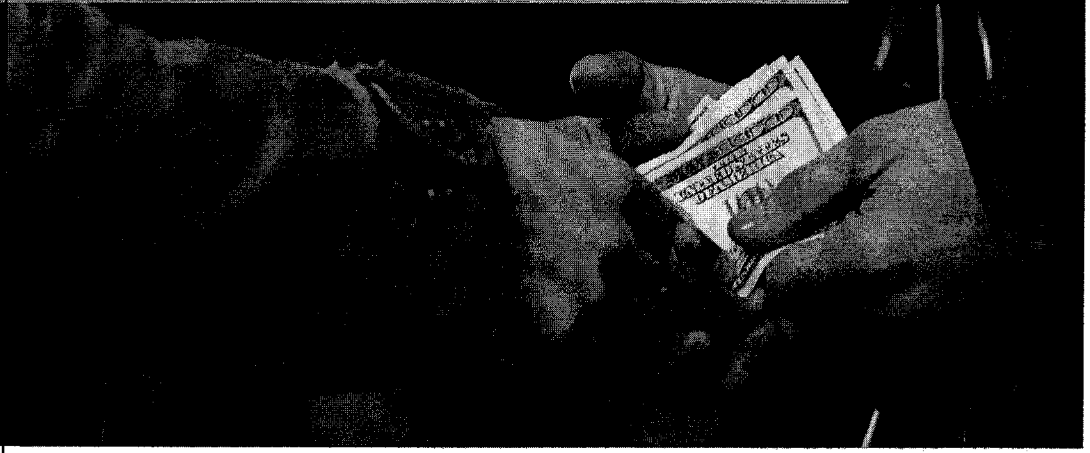
The giving or receiving of bribes of any description, regardless of amount is prohibited. This applies to Employees, Contract Staff or Industry Partners working on our behalf.

Illegal Payments - Bribery and Corruption

Tullow conducts its business honestly and transparently and does not seek to exercise improper influence on any individual or entity. We are subject to domestic and international anti-bribery and corruption laws which target bribes in relation to both commercial entities and public officials.

We do not offer or give, nor request or receive, any bribe of any description or value to obtain or retain business, to reward the improper performance of someone's duties or for any other purpose. This applies to everyone who works for, or provides services to, Tullow.

Although bribes are usually associated with money they can also be disguised in other forms such as the offer of a job for an individual or family member, travel, accommodation, use of assets or preferential terms on a product or service. Exercising poor judgment with respect to giving or receiving gifts and hospitality could also result in a breach of the law with serious consequences for individuals and the Company.



KEY REQUIREMENT

You must report any suspicion of bribery immediately. The reporting options are provided in this Code.

Facilitation or 'Grease' Payments

Facilitation or 'grease payments' are small value payments made to public officials to speed up a routine administrative process to which the person is entitled. Examples are a payment to expedite the issue of a visa, to obtain an official stamp or signature on a document, to enable goods to clear customs or jump a queue. The UK and many other countries prohibit facilitation payments and **Tullow does not permit such payments to be made either directly or by those who work on our behalf.** If you are asked to make a payment then you should refuse and report it to your line manager and email the details to the compliance mailbox (compliance@tullowoil.com) where it will be treated in confidence. If under exceptional circumstances a facilitation payment is made under duress, such as where your health or safety is at risk, then this should be immediately reported to your line manager and legal advisor.

KEY REQUIREMENT

Report requests for facilitation payments as it enables us to understand where the risks are and to help others to say 'no'.

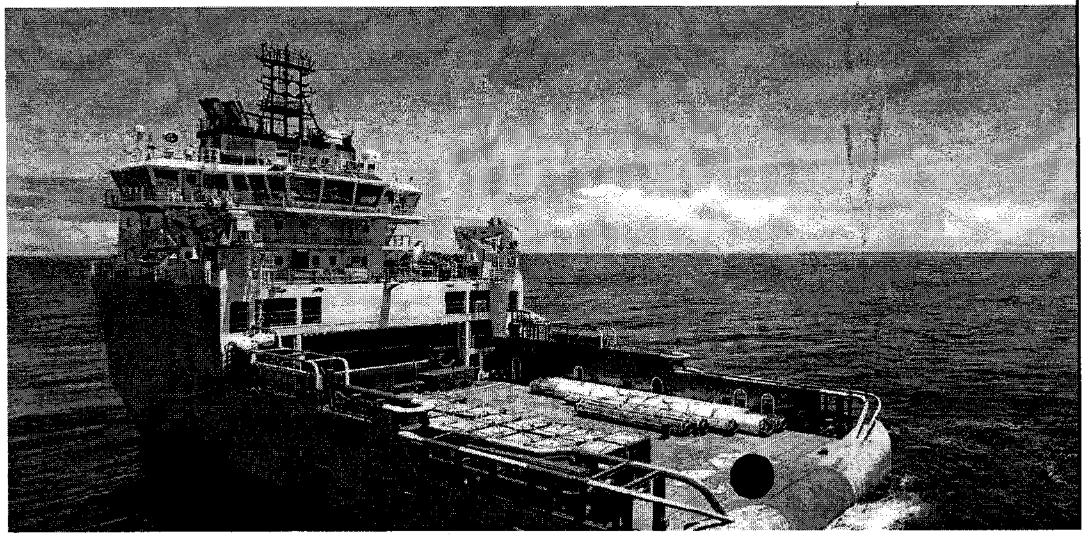
WE DO NOT MAKE OR ACCEPT ANY ILLEGAL PAYMENTS - continued

Facilitation or 'Grease' Payments - continued

Facilitation payments are often made in the mistaken belief that they will speed up an administrative process. However, companies that make these payments often discover that officials create further obstacles or increase the value of the payment required.

Question: One of our Industry Partners has told me that they regularly have to make small value payments to customs to enable the paperwork to be processed and the goods released otherwise we will wait for months. Since we are not making these payments is this allowed?

Answer: No, it is not allowed. The Industry Partner is working on our behalf and although we are not making the payments directly we are legally liable for their actions under the UK Bribery Act. You should raise this with your line manager and legal advisor to determine how to eliminate these illegal payments.



Gifts and Hospitality

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

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

It is not possible to describe every possible situation which may arise so you must always exercise common sense and good judgement when considering whether it is acceptable to give or receive a gift or hospitality. Where there is any doubt then you should consult with your line manager.

You must not:

- request or solicit gifts or hospitality from an individual or organisation;
- give or receive gifts or hospitality when engaged in a bidding process;
- give or accept cash or cash equivalents (eg. gift vouchers or loans);
- provide or accept any gift or hospitality that is inappropriate, indecent, illegal or could cause reputation damage to Tullow;
- pay for any gift or hospitality personally to avoid the approval process or recording requirements.

You must ensure that any gift or hospitality:

- is for a bona fide business purpose;
- is given or received openly and transparently;
- complies with applicable laws;
- complies with the rules of the receiving organisation;
- is not given or received frequently between the same individuals;
- is properly recorded.

WE DO NOT MAKE OR ACCEPT ANY ILLEGAL PAYMENTS - continued

Gift and Hospitality - continued

The Tullow Gifts and Hospitality Policy provides a decision making process, sets out the rules that must be followed prior to giving or accepting a gift or hospitality and defines the approval and recording requirements.

Note that additional rules apply for gifts and hospitality provided to Foreign Public Officials and you should familiarise yourself with these.

KEY REQUIREMENT

Policy summary for gifts and hospitality

Staff can self approve gifts and hospitality providing that the requirements of the Gifts and Hospitality Policy are met and values are less than US$50 (gift) and US$150 (Hospitality). Above these limits, or if it is a frequent occurrence, management approval is required as defined in the Policy.

With the exception of low value (<US$25) promotional items such as calendars, diaries, caps, tee shirts etc., all gifts and hospitality **must** be recorded on the Tullow Gifts and Hospitality register.

Businesses may apply more restrictive approval limits to suit local culture and conditions and staff should ensure that they are aware of the local requirements that apply to them.

Question: I have been offered two tickets for a football match by a supplier with whom I interact. He cannot attend and I have the use of their corporate box. I have no idea of the value and don't know whether to seek approval from my line manager or not?

Answer: Since the supplier will not be present then this is a gift and not hospitality and you do have to question the business purpose if you are not interacting with the donor. Given the circumstances and given that you are unsure of what to do then you should consult with your line manager.

Expenditure related to Foreign Public Officials

Who is a Foreign Public official?
A Foreign Public Official includes officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind of a country or territory outside the UK. It also includes any person who performs public functions in any branch of the national, local or municipal government or who exercises a public function for any public agency or enterprise of such a country or territory.

The above includes Employees of National Oil Companies, State owned companies, suppliers or joint ventures, government ministries, immigration, customs and politicians or political candidates.

There are many circumstances where we may incur legitimate expenditure related to Foreign Public Officials. This includes expenditure which seeks to improve Tullow's image, to better present its capability and services or establish cordial relations.
However, under the UK Bribery Act and many other local and international laws, the offer, promise or giving of any financial or other advantage to a Foreign Public Official with the intent of obtaining or retaining business is an offence (a bribe) which carries severe penalties for individuals and companies.

WE DO NOT MAKE OR ACCEPT ANY ILLEGAL PAYMENTS - continued

Expenditure related to Foreign Public Officials - continued

You must ensure that any gift, hospitality or other expenditure related to a Foreign Public Official cannot be considered as a bribe. This applies even under circumstances where there is a contractual requirement to incur expenditure such as the provision of training or technical/operational meetings.

You are expected, and it is your personal responsibility, to use your good judgment. You must ensure that any expenditure on Foreign Public Officials is properly authorised and is transparent, ethical and in compliance with local and international laws, this Code of Business Conduct and any other policies that have been implemented.

KEY REQUIREMENT

Ensure that any expenditure related to a Foreign Public Official is for a genuine business purpose, is properly authorised, reasonable and transparently recorded.

Question: A senior government official is due to visit our London office for two days of meetings to discuss a new project. His office has now called to ask us to book and pay for three first class return fares and 5 star hotel accommodation for one week for the official, his wife and son – what should I do?

Answer: You should immediately inform your line manager of the request. We would only pay for the official's travel and appropriate accommodation for the period of the meetings. As it does not relate to the business purpose, we cannot pay for the additional tickets and accommodation for his family members.

Working with Industry Partners

We regularly work with joint venture partners, local and international contracting companies, suppliers and individuals ("Industry Partners"). These can create a liability for Tullow if they behave inappropriately or pay bribes (which includes facilitation or 'grease' payments), while working for us. We must ensure that all of our Industry Partners are aware of this Code of Business Conduct and act in accordance with it. Authorising, allowing, or tolerating an Industry Partner to pay a bribe on behalf of Tullow is unlawful, and a breach of this Code.

We endeavour to choose Industry Partners who have equivalent anti-bribery and ethical standards and who similarly expect the same in their own contractual relationships. You must follow the mandatory Contracts and Procurement Tendering and Contract Award Procedures when involved in the selection of, or contracting with, an Industry Partner.

For more information read the Contracts and Procurement Tendering and Contract Award Procedures on the Intranet.

Contractual terms with Industry Partners should contain anti-bribery statements and in high risk activities you should consider how best to monitor their performance to provide assurance that they are adhering to contractual requirements.

WE DO NOT MAKE OR ACCEPT ANY ILLEGAL PAYMENTS - continued

Due Diligence

Due Diligence is an important process in determining factors such as legality, reputation, experience, business integrity, technical and commercial capability and track record and can be applied to a prospective Employee, Contract Staff member or an Industry Partner. It is also used to determine potential liabilities which may result from an acquisition or a merger. We carry out risk based due diligence which includes the consideration of bribery risk. The level and complexity of the due diligence which is carried out is proportional to the perceived risk and may range from no due diligence (low risk) to extensive enquiries (high risk).

Where an individual or Industry Partner is likely to interact with Foreign Public Officials then this can increase the risk and extra care must be taken to ensure that they have high ethical standards and unwavering business integrity.

If you are responsible for selecting an individual or Industry Partner you should:

- consider the risks involved to assess whether due diligence is required;
- ensure that any due diligence carried out is documented.

Monitoring of Industry Partners

We endeavour to monitor the activities and performance of our Industry Partners in line with the perceived risks. This includes ensuring that the law is complied with and high ethical standards are maintained at all times. Where the activity is perceived as higher risk we exercise greater oversight and require further assurance that work processes and methods are in compliance with the law and our ethical requirements.

Higher risk activities may include those which involve an interface with Foreign Public Officials or take place in a country or sector where bribery or serious corruption is known to be prevalent.

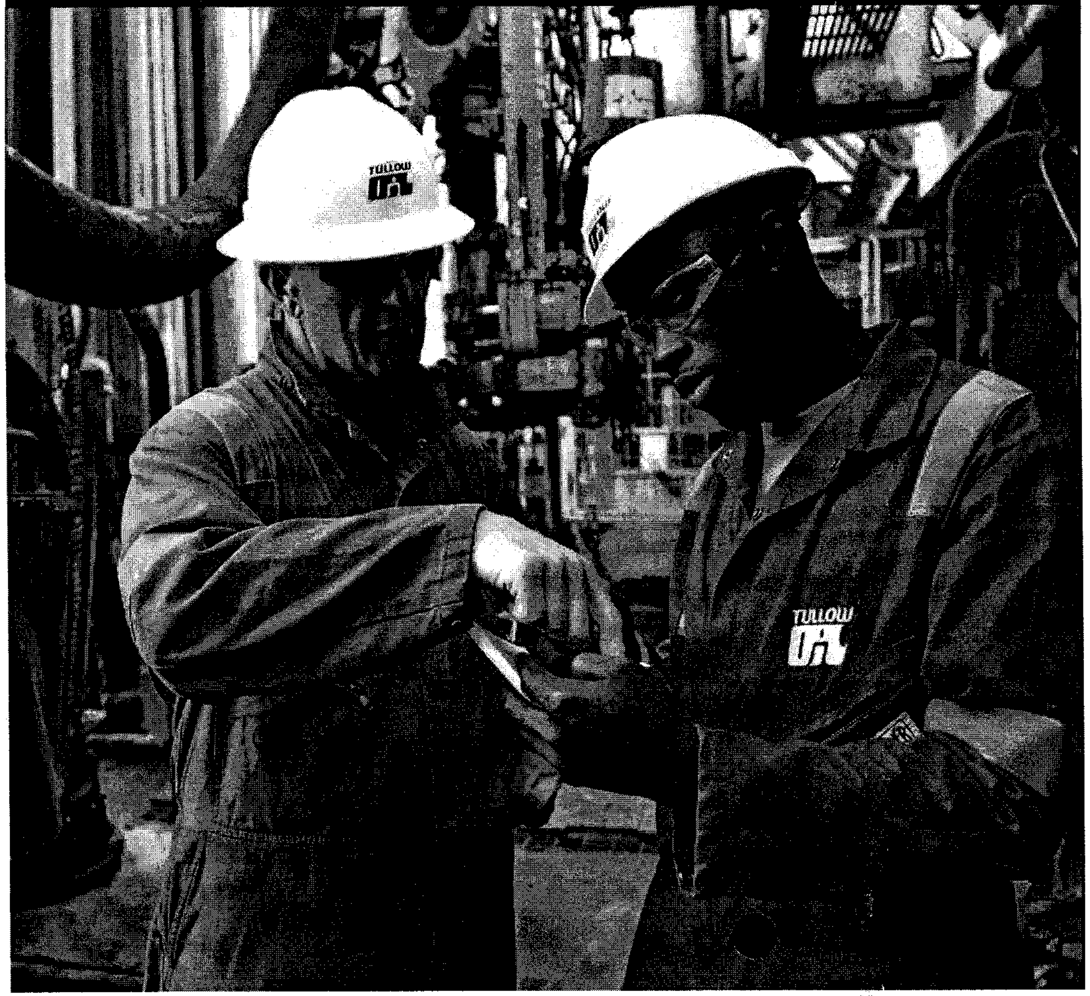
If you are responsible for managing an Industry Partner where you consider the risks to be high then you should:

- proactively monitor compliance with contractual terms and ensure that they meet any reporting requirements;
- encourage the Industry Partner to raise any ethical challenges and work with them to resolve the issue;
- periodically remind the Industry Partner of their obligations;
- immediately report any activity or behaviour that breaches the law or our Code.

Question: There is an urgent requirement for a safety permit but despite the fact that all of the conditions have been met the government ministry has refused to issue it. A well connected advisor has been recommended who might be able to obtain the permit but should you meet with the advisor?

Answer: There is a risk that some of the advisor's fee will be passed on to a ministry official which would be paid on behalf of Tullow and break the law. You should not meet with the advisor but should ask for further guidance from your line manager or legal advisor.

OUR COMMITMENT TO CORPORATE RESPONSIBILITY



Tullow behaves responsibly in all aspects of our business to create an environment that helps us to successfully deliver our business plans, continue our growth strategy, and contribute to social and economic development, both within and outside of our core business activities, in the countries in which we operate. We call this Creating Shared Prosperity.

Creating Shared Prosperity means:

- delivering returns for our shareholders and providers of capital to the business;
- managing our business ethically and with integrity;
- engaging and responding in a genuine way with all our stakeholders;
- keeping our people safe and minimising our impact on the environment;
- being a rewarding, challenging and great place to work;
- building long-term sustainable supplier relationships;
- creating real opportunities for local people and local enterprise development;
- working with and supporting our local communities.

Our goal is for Tullow to provide excellent support and service in the development of new oil producing countries, to have made a significant contribution to real progress in economic and social development in those countries and, above all, to be a company that delivers on its responsibilities.

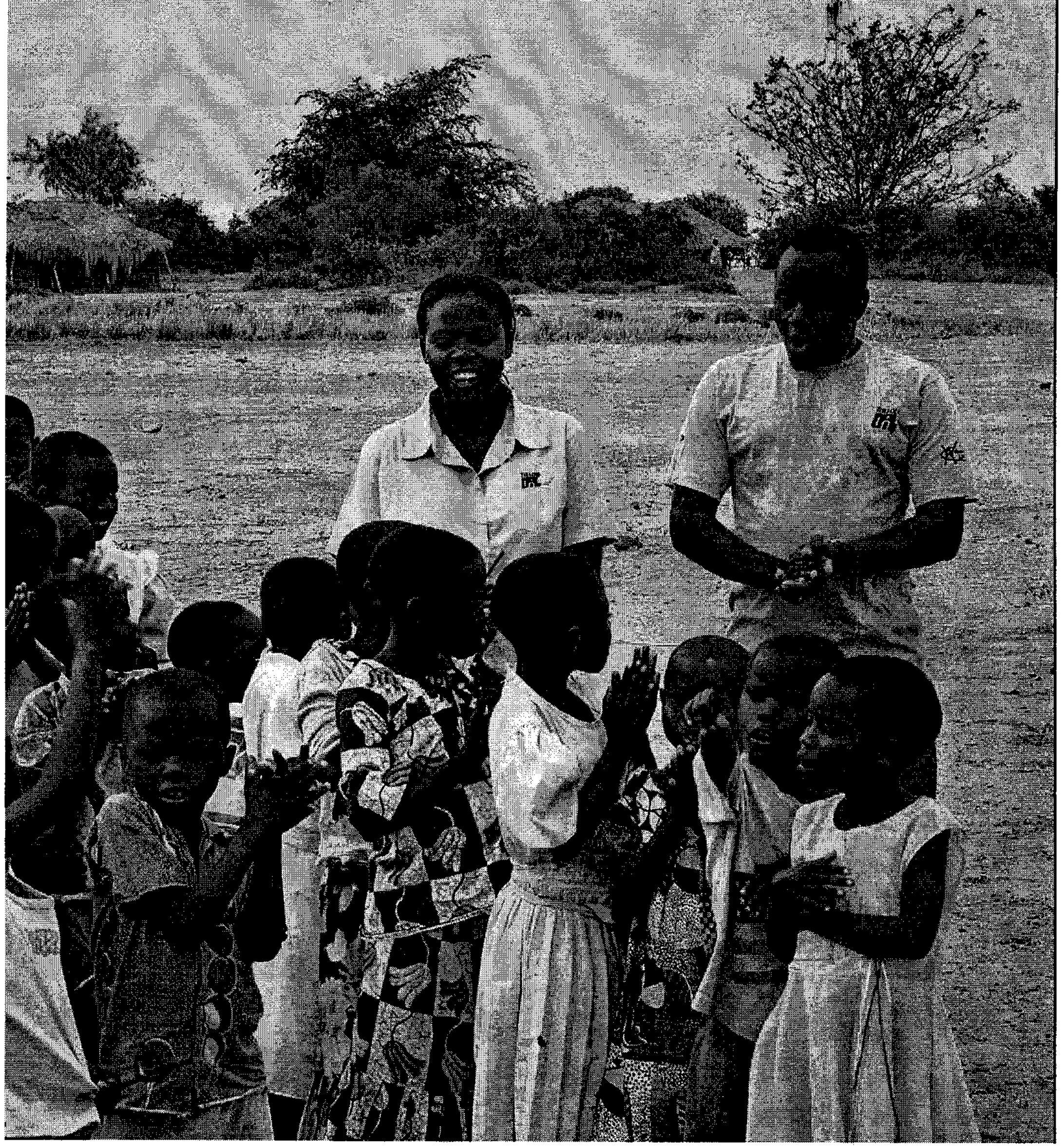
Human Rights

Tullow supports and respects the protection of internationally recognised human rights in our areas of operation. We uphold and promote human rights within our sphere of influence which can include, but is not limited to, Employees, Contract Staff, Industry Partners and suppliers.

Child Labour

Tullow does not use underage, forced or compulsory labour and everybody who works for Tullow is expected to be aware of this and abide by this commitment. If you become aware of, or suspect that this commitment is being breached by any individual or Industry Partner working for, or on behalf of, Tullow then you must immediately report it to your line manager for appropriate action to be taken.

OUR COMMITMENT TO CORPORATE RESPONSIBILITY - continued



Social Enterprise, Capacity Building and Charitable Donations

We support local and community social enterprise projects and education and capacity building initiatives and we also make charitable donations to appropriate and relevant causes. It is important that the benefits of these initiatives reach the intended organisations and the value to communities is maximised.

There are circumstances where funding or a charitable donation could be misappropriated or interpreted as a bribe. In order to prevent this, appropriate due diligence should be carried out to ensure that the recipients are bona fide and to provide assurance that the funding or donation will be used for its intended, legitimate purpose.

Guidelines for Social Enterprise (SE) community projects have been developed which outline our selection criteria, approval process, monitoring and reporting processes.

All social enterprise, capacity building or charity funding should:

- be clearly documented and transparent;
- be made to legitimate organisations;
- identify the beneficiaries;
- be properly approved in advance;
- be monitored to ensure that they are used as agreed.

For more information consult Group External Affairs in London or your local Corporate Affairs Team.

Political Contributions and Activities

We do not make any political contributions, (whether of money, property, materials or services), to political candidates, parties, committees or their representatives, and we do not participate in any intervention in the political process of host countries. You may choose personally to become involved in political activities as long as you undertake these on your own behalf, in your own time, and using your own resources.

WE ENSURE ALL DOCUMENTATION, INCLUDING FINANCIAL ACCOUNTS AND RECORDS, IS ACCURATE, COMPLETE AND TRUTHFUL

Accuracy of Accounts & Records

Truthful and accurate information, whether financial or non-financial in nature, is essential to support sound business decisions, to meet our legal and regulatory obligations and meet our responsibility to all of our stakeholders.

We maintain internal accounting controls and ensure that books, records and accounts reflect accurately, transparently and in sufficient detail, all transactions in connection with our business.

You must:

- comply with all relevant laws and external and company reporting requirements ;
- ensure that all transactions are honestly and accurately recorded;
- cooperate with our internal and external auditors when requested for information.

You must not:

- deliberately falsify information or data in any media;
- operate outside of the limits of your delegated authority.

KEY REQUIREMENT

All financial transactions must be accurately and transparently recorded in line with generally accepted accounting principles.

Question: I work in the finance department and my supervisor has asked me to record some large expenses under a category which I think is incorrect. What should I do?

Answer: You must not record the expenses until you are satisfied the entry is correct. You should raise the issue with your supervisor and if you are still concerned you should escalate the matter.

Cash Transactions

Cash transactions should be kept to a minimum as the use of cash has the potential to result in breaches of accounting regulations, illegal transactions, money laundering, and fraud. Wherever possible, cash transactions should be avoided. Where it is unavoidable, cash transactions or petty cash facilities must be approved by management with all transactions being properly and transparently accounted for.

Giving or receiving cash can result in misappropriation, can be misinterpreted and can lead to a loss of transparency.

Question: A company that does consultancy work for us has requested that I pay this month's invoice in cash. We have a petty cash process so is this acceptable?

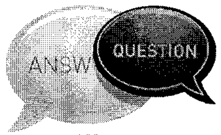
Answer: No, we have no way of knowing if the cash payment will go to the correct company and it may not be in accordance with the payment provisions in our contract. Additionally, the payment will not be transparent and could be seen as money laundering or tax avoidance. You should report this to your Finance Manager.

WE ENSURE ALL DOCUMENTATION, INCLUDING FINANCIAL ACCOUNTS AND RECORDS, IS ACCURATE, COMPLETE AND TRUTHFUL - continued

Money Laundering

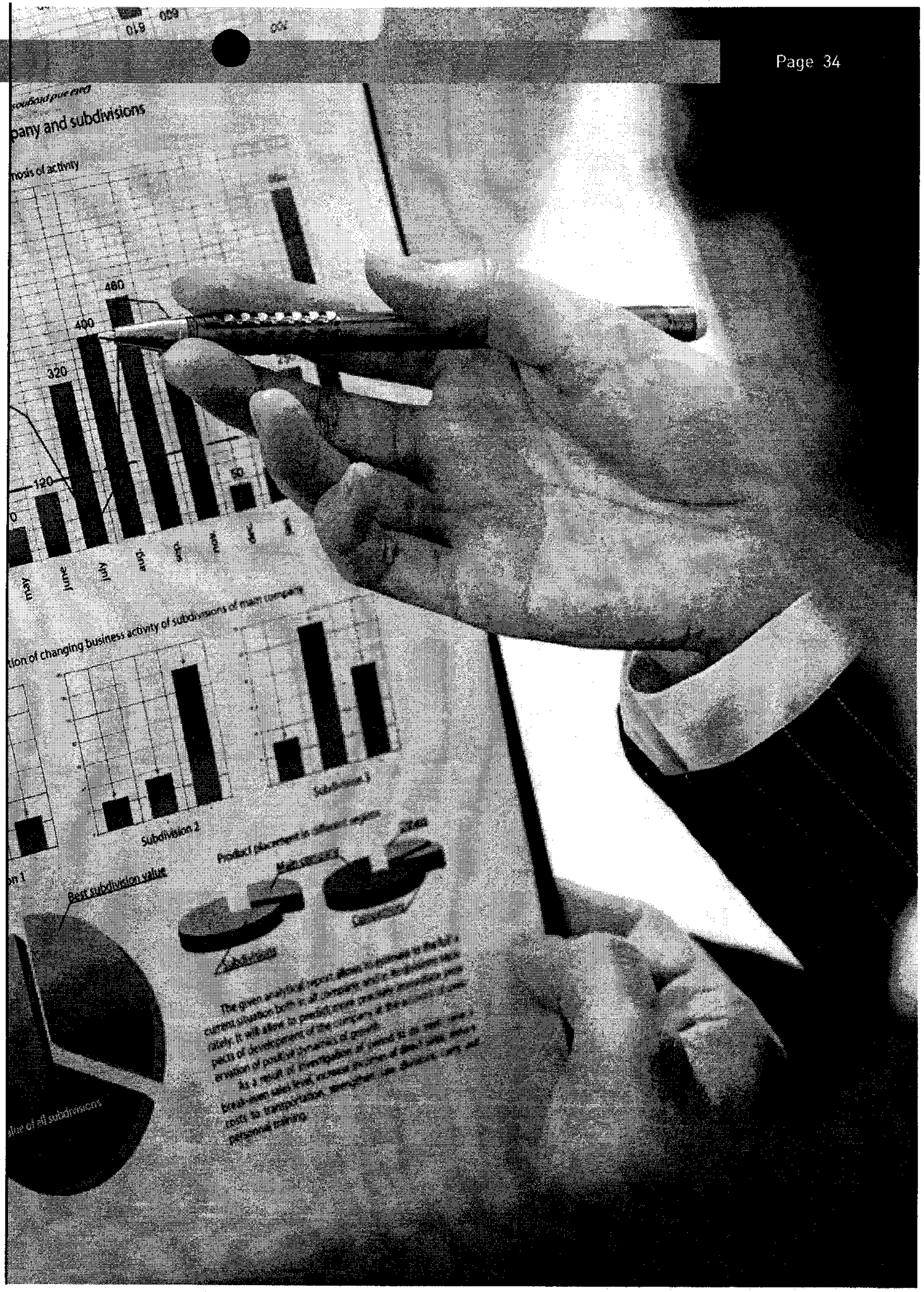
Money laundering is a term used to describe methods of hiding or disguising the proceeds of illegal transactions. There are stringent international laws targeting those who engage in or assist with such transactions. We fully support anti-money laundering policies.

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



Question: A supplier has recently asked us to make payment to a private individual in another country rather than to their normal company account. Is it OK to do this provided we get the supplier to confirm their request in writing?

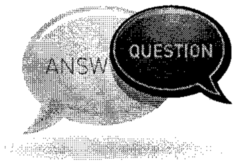
Answer: No. All payments to suppliers should be made to the actual company that supplies the equipment or services and not to any other individual or company.



WE PROTECT OUR ASSETS AND RESPECT THE ASSETS OF OTHERS

Protection and Use of Company Assets

Our data and other company information, office equipment, tools, vehicles, supplies, facilities, and services must be used only for authorised purposes, and you must maintain, account for, use and dispose of them properly. Unauthorised removal or destruction of Tullow assets is strictly prohibited.



Question: My close friend runs a small business and has asked if I can print promotional literature from a CD that he has supplied. Is this acceptable?

Answer: It is not acceptable. Such action would be a misuse of Tullow resources and you must decline his request.

Intellectual Property

Our intellectual property, (such as physical or electronic data, reports, confidential business information, inventions, designs, logos and copyright materials), is a valuable company asset and you must be careful to protect it and use it properly. We also respect the intellectual property of others and when it is in our care we protect it in the same manner as our own.

Confidentiality

You must ensure that confidential information is properly protected from unauthorised access and use at all times. Unauthorised disclosure of confidential information can lead to loss of competitive advantage and in some circumstances can break the law.
Protection of confidentiality extends to physical documents, information stored electronically and information that is verbally transmitted.

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

The duty to keep this information confidential continues even after your employment with Tullow ends. Any confidential information which is provided to us by a customer or other business partner must also be treated in the same manner as our own.

KEY REQUIREMENT

Always ensure that you properly secure confidential information when unattended, use your screensaver and do not discuss confidential matters in public where others can listen to the conversation .

WE PROTECT OUR ASSETS AND RESPECT THE ASSETS OF OTHERS - continued

Conflicts of Interest

Tullow respects the privacy of its Employees and does not normally take an interest in personal conduct outside of work. However, when an Employee's personal, social, financial or political activities interfere or have the potential to interfere with the Employee's loyalty and objectivity toward Tullow, a 'conflict of interest' may exist.

If you become aware of any business, financial or other relationship with suppliers, business associates, competitors or even other Employees that might influence or appear to influence the exercise of their or our business judgment you must declare this in writing to your manager to enable the best course of action to be determined.

Possible Conflicts of Interest include:

- having a second job;
- conducting Tullow business with a family member or an organisation with which a family member is connected;
- supervising a family member or someone with whom you have a close personal relationship or being in a position to influence their recruitment or terms and conditions of employment;
- having any significant economic interest with any company that does business or competes with us.

Question: I work in Tullow's purchasing department and we have requested bids for a large equipment purchase from a number of suppliers. My uncle has recently joined one of the companies that are bidding as their marketing manager.
Is this a problem?

Answer: The fact that you work in purchasing and your uncle works in sales for a company bidding for a Tullow contract could be a conflict of interest or at least give the appearance of a conflict. You should disclose this in writing to your line manager. Depending on the circumstances it may be necessary to ensure that you do not have a role in this particular bid process.

KEY REQUIREMENT

If you believe that you have a conflict of interest then you must report it in writing to your line manager.

External Communications

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

WE COMPETE FAIRLY

Competition / Anti Trust Law

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

Competition laws, known as anti-trust laws in some countries, regulate anti-competitive conduct and prohibit agreements or practices that restrict free trading and competition. Examples include price fixing, market sharing, limiting production or capacity or abuse by monopolising a market. The penalties for anti-competitive behaviour are severe and can be up to 10% of Group global turnover with prison sentences for offenders.

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

KEY REQUIREMENT

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

WE REPORT ALL CONCERNS AND VIOLATIONS IN A SPIRIT OF OPENNESS AND TRANSPARENCY

Duty to Speak Up

We are committed to maintaining the highest standards of integrity, transparency and business conduct. If you know or suspect that someone within Tullow, or someone performing services for us, has breached this Code, or you have concerns about any aspect of our business practices, you must immediately report it.

If you are not sure whether to speak up you can ask yourself the following questions:

- does the action you are concerned about comply with our Code of Business Conduct?
- is it legal?
- does it conform to our company values?
- how would it appear if it was reported in a newspaper?
- would others consider it responsible - colleagues, family or Industry Partners?

If it feels wrong, it probably IS wrong.

What to Report

Examples of concerns which would certainly require you to speak up would be:

- where a criminal offence has been, or is likely to be, committed;
- where someone has failed to comply with a legal obligation;
- any disregard for health and safety including any breach of legislation;
- any act which may cause damage to the environment;
- any financial irregularity or suspicion of bribery or fraud;
- any action intended to conceal information regarding any of the above matters.

It is in all of our interests to raise concerns early to prevent an occurrence of a breach or to minimise the impact of something that has already happened. If you report a concern then you are doing the right thing and acting in the interests of Tullow. Any manager who is approached with a genuine concern or a reported breach must take appropriate action to ensure that it is dealt with properly and where necessary must take further advice or inform more senior management to determine the best course of action.

KEY REQUIREMENT

If you are ever unsure of the action to take then ask for advice.

"We want people to speak up if they have concerns because if we don't know about it then we can't put it right".

WE REPORT ALL CONCERNS AND VIOLATIONS IN A SPIRIT OF OPENNESS AND TRANSPARENCY - continued

Company Commitment

Tullow will not tolerate retaliation in any form against an individual who speaks up in good faith even if the concern is later determined to be factually incorrect or untrue. We will treat all cases seriously, determine the facts and take any action that is required. Where necessary we will carry out a formal investigation with trained personnel and in the event of a breach of the law then we may inform relevant authorities or law enforcement agencies.

How to Report

Our aim is to provide a supportive culture where everyone who works for us will feel comfortable and empowered to raise an issue or concern without fear of retaliation. The most common method of reporting a concern is to discuss it with your line manager, supervisor or Company Representative but you could also consult with any other manager such as within Human Resources or the Legal department. If the matter is very serious or involves the company's management then you can report it to the General Counsel, the Chief HR Officer or the Group Compliance Manager.

If you do not feel comfortable to raise an issue directly with management within Tullow then we have provided an alternative, independent method of reporting called Safecall. Safecall is operated by an independent company and is available 24 hours a day and 7 days a week.
All calls are treated in confidence by trained operators who will take full details of the issue and then relay this to the Group Compliance Manager who will initiate any appropriate actions. The Safecall contact details can be found on the Tullow intranet.

Our preference is for you to report openly and provide your details to Safecall in order for them to be able to contact you for clarification or for any resulting investigation team to talk to you directly. However, if you do not wish to leave your name then you can report anonymously although there may be a lower chance of resolution if you do not supply sufficient details of the issue or concern.

Safecall is provided for genuine concerns reported in good faith and it is a breach of this Code to report maliciously, deliberately distort the truth, to pursue a grievance or attempt to gain a personal advantage.

Contacting Safecall

You can contact Safecall using either the freephone numbers provided or by using the international number provided for 'other locations'.

UK – 0800 915 1571
Dublin – 1800 812740
South Africa / Netherlands – 00800 723 32255
Ghana - 030-2742249
Uganda – 0312 564 099
Bangladesh – 00 880 2 8822075
Pakistan – 800 900 44036

Other locations – 00 44 20 7696 5952

INDEX

Contact details:

Tullow Oil plc
9 Chiswick Park
566 Chiswick High Road
London
W4 5XT
United Kingdom

Email: info@tullowoil.com

Tel: +44 (0) 20 3249 9000
Fax: +44 (0) 20 3249 8801