

Tullow Oil PLC: Modern Slavery Act Transparency Statement

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

This Statement is made in respect of the financial year ending 31 December 2023. The Statement outlines the steps we took to address modern slavery risks, including the governance processes and progress we made in our own operations and supply chains.

1. Introduction

Tullow Oil PLC ('Tullow') and its subsidiaries (together, the 'Group') is committed to meeting the requirements of the Act and respecting internationally recognised Human Rights including fundamental labour rights and international labour standards as set out in the International Bill of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We recognise that the nature and context of our business which is often based in remote areas in developing countries potentially exposes our organisation and supply chain to the risk of modern slavery and human trafficking, including underage, forced, or bonded labour. We regularly assess the extent of this risk and take reasonable steps to ensure that modern slavery is not taking place in Tullow's business or supply chain.

2. About Tullow

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

3. Our Supply Chain

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

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

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

4. Governance, Policy, and Standards

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

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

5. Due Diligence and Assurance

Operations

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

Supply Chain

Our Group Supplier Due Diligence (DD) Procedure and Ethics & Compliance Due Diligence (E&C DD) Standard set out procedural requirements for due diligence checks of our suppliers, including due diligence requirements in respect of Human Rights and labour conditions. We continue to evolve our approach as we learn more about modern slavery risks and recognise that working alongside suppliers to enhance their own due diligence programs is a critical component to understanding and addressing the risks that lie within supply chains. For 2023, selected suppliers completed a self-assessment form. The self-assessment process determines supplier compliance with the Modern Slavery clauses in their contracts. The responses to the self-assessments enable us to identify areas for further training and prioritization of suppliers to audit.

Tullow's standard form procurement contracts include specific references to compliance with applicable anti-slavery and human trafficking laws.

Remediation

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

6. Assessing effectiveness

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

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

To further enhance our approach to monitoring effectiveness through the Working Group, in 2023, we carried out a Human Rights saliency assessment which identified eight salient issues. Our prioritised salient Human Rights issues include labour rights. Action plans have been developed for five of the salient issues. Our efforts in supply chain build on the labour rights salient issue action plan, by focusing on eliminating forced labour and child labour, non-discrimination, and safe and healthy working conditions. We also formalised our Human Rights framework and roadmap, as well as the Terms of Reference for the Working Group. Our new Human Rights roadmap commits us to working to mitigate Human Rights in eight areas in line with the United Nations Guiding Principles on Business and Human Rights (UNGP) and other frameworks that we support.

The Working Group standing agenda includes a performance update and a broader review of recent due diligence activities, the effectiveness of our programs and the support being provided to better facilitate the integration of modern slavery controls in our business planning processes across the Group. The Working Group met five times in 2023 with key agenda items including:

- External Human Rights trends.
- Reviews of Human Rights grievances and risks.
- Reviews of salient Human Rights issue action plans, including the labour rights action plan which has actions to manage modern slavery risks in our supply chain.

In 2023, we worked with an external consultant to assess our supplier base and identify suppliers with potentially high exposure to modern slavery risks. We identified 103 high-risk suppliers. Following the prioritisation exercise we rolled out supplier self-assessments to high and medium risk suppliers. The responses to the self-assessments enable us to identify areas for further training and prioritize suppliers to be audited in 2024.

7. Training

All Tullow staff are required to complete the Company's annual Code of Ethical Conduct e-learning course, developed to ensure greater awareness of the Code's requirements and support the application of the Code in our day-to-day activities. In 2023 we achieved 100% completion by staff of the Code eLearning programme.

Following the supplier prioritisation exercise we delivered the following training:

- Mandatory labour rights awareness training for 70 contract advisors and contract holders with suppliers in high-risk categories, to ensure clarity on roles and responsibilities and due diligence requirements.
- A half-day training session on labour rights for 140 suppliers, to ensure they understand our expectations, and know where to get support to implement appropriate processes in their own operations.

We also held a Human Rights round table discussion attended by more than 200 employees; the session coincided with Human Rights Day and was an opportunity to reflect on the progress made in respecting and promoting Human Rights. Employees shared examples of how they consider Human Rights in their day-to-day work including working with suppliers on labour rights. Some consistent themes emerged during the discussions, such as proactive engagement, continual improvement of internal processes and the importance of collaborating internally and with external stakeholders to address Human Rights impacts.

In 2024 we plan to invite suppliers to complete International Petroleum Industry Environmental Conservation Association (IPIECA) and Building Responsibly labour rights training, that we piloted in 2022.

8. Next steps

In 2024, we will continue to monitor effectiveness through the Working Group. We will also continue to emphasise to our staff and suppliers our commitment to ensuring that modern slavery and human trafficking is not part of our supply chain. We have established KPIs to assess our effectiveness in combating modern slavery, including the following metrics:

- Update our Human Rights Policy and continue integration of Human Rights in our group policies and standards.
- Monitor progress on the actions included in the salient issue action plans.
- Review and assess the responses from supplier self-assessment forms for follow up and strengthen our supplier human assurance programme by conducting four supplier labour rights audits.
- Review and assess the number of Human Rights related speak up complaints received, the findings and the resulting actions. Alongside this we will review the grievance mechanisms and remediation processes against the UNGP effectiveness criteria.
- Roll out IPIECA and Building Responsibly labour rights training to suppliers.

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

Signed by



Rahul Dhir

Chief Executive Officer (CEO)

on behalf of the Board of Tullow Oil PLC