

**Tullow Oil Plc**

## **Good Practice Guidance on Human Rights for Suppliers**

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## Revision History

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## Summary of Changes

Section(s)	Change Description
General	General Minor Edit

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## 1. Purpose

This document provides Tullow suppliers with a repository of tips and good practices on how to ensure respect for human rights in their operations and supply chains through the implementation of human rights due diligence (HRDD).

*“Human Rights due diligence is a way for enterprises to proactively manage potential and actual adverse Human Rights impacts with which they are involved. It involves four core components: (a) Identifying and assessing actual or potential adverse human rights impacts; (b) Integrating findings from impact assessments across relevant company processes; (c) Tracking the effectiveness of measures; (d) Communicating on how impacts are being addressed. The prevention of adverse impacts on people is the main purpose of human rights due diligence.”*

### 1.1. Why is this Guidance relevant for Tullow Suppliers?

#### 1.1.1. Tullow's Human rights expectations

Tullow is committed to conducting its business ethically, legally and in line with its [Code of Ethical Conduct T-CMP-POL-0001](#) and the [Human Rights Policy T-GPA-POL-0001](#).

As a UK-registered company, Tullow is required to comply with the UK Modern Slavery Act 2015, in addition to other local and extra-territorial laws that apply to Tullow's business, which require that Tullow conducts due diligence on its suppliers to identify and manage risks of human rights and labour condition violations in its supply chain.

Tullow respects internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We seek to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Voluntary Principles on Security and Human Rights.

Tullow conducts ongoing human rights due diligence in line with the UNGPs to identify, prevent and mitigate actual and potential impacts on human rights. We apply risk-based due diligence to all business relationships

Prior to contract award, Tullow performs ethics and compliance due diligence on its suppliers on a risk-based basis, in line with the Group Supplier Due Diligence Procedure.

Post contract award, as part of Tullow's human rights strategy, Tullow endeavours to conduct checks on its suppliers to determine the supplier's level of commitment and controls in respect of ensuring that there are no human rights or labour conditions violations in Tullow's supply chain.

#### 1.1.2. Human Rights Risks in the Oil and Gas Value Chain

It is well known that activities in the oil and gas value chain can expose workers and communities to different human rights risks, some more severe than others. As part of our human rights due diligence process, we have mapped out risks to human rights in our value chain. Examples of potential impacts that can occur in our value chain if adequate prevention and mitigation measures are not effectively implemented are:

- Long working hours and lack of rest for employees
- Employee injuries from workplace accidents
- Improper waste management affecting local communities

#### 1.1.3. Increased scrutiny and expectations around HRDD

Companies operating in Ghana's oil and gas sector are under growing pressure to implement robust human rights due diligence (HRDD), which is a direct reflection of the growing consensus around HRDD as the golden standard for responsible business conduct. An important driver for this growing consensus is the transposition of the UNGPs into hard law by different countries around the globe. Even though most regulatory developments are concentrated in Europe, they are raising the bar for corporate accountability across global supply chains.

In Ghana, the government's development of a National Action Plan on Business and Human Rights signals a growing domestic commitment to aligning with international standards, reinforcing the expectation that companies operating locally must proactively identify, prevent, and address human rights risks.

At the same time, civil society organizations (CSOs) in Ghana and across West Africa are increasingly monitoring corporate behaviour, particularly in the extractive industries. These groups are aware of the language and expectations of the UNGPs and are using them to frame advocacy, community engagement, and strategic litigation.

Companies failing to meet these expectations risk not only losing their social license to operate, but could also be exposed to reputational damage, loss of access to markets, exclusion from procurement processes, or even legal liability.

## 2. Companies' involvement in adverse human rights impacts

Companies can be directly or indirectly involved in human rights impacts. The UNGPs describe three degrees of causal link between a company and adverse human rights impacts<sup>1</sup>.

**Caused:** When the company's own actions or omissions are responsible for generating harm to people.

***Example:** Residents near a processing plant suffer health issues after a company discharges toxic waste near a residential area with no or insufficient containment measures.*

**Contributed:** When a company's business partner (for example, a contractor) is the one directly causing the harm through its actions or omissions, but the company enabled or facilitated it through its acts or omissions.

***Example:** A construction company, under pressure from a key client to accelerate the recruitment of new employees, adopted expedited hiring practices and relied on third-party intermediaries. These intermediaries failed to disclose that they were charging workers excessive recruitment fees. Some of the recruited workers were migrants whose passports were withheld until the fees were paid, raising serious concerns about coercion and potential indicators of forced labour.*

**Linked to:** When a business partner causes the harm with no input from the company, but the company benefited from the activity underlying the impact

***Example:** A company hires a security service provider. Even though the company ran a thorough human rights evaluation on the service provider and required the service provider to continuously manage and report on its human rights commitments, setting clear expectations and guidelines on human rights respect during security inspections, some of the security provider's guards used excessive force and disrespected the company's employees during routine security inspections.*

<sup>1</sup> In deciding whether a company has caused, contributed or is directly linked to a human rights impact, factors to consider include: (a) Whether the company is directly and solely responsible for that impact, (b) Extent to which the company enabled, encouraged, or motivated human rights harm by another, (c) Extent to which it could or should have known about such harm, (d) Quality of any mitigating steps it has taken to address or prevent the harm.



When an adverse impact takes place, companies connected to it will be expected to respond according to their degree of connection to the impact:

Cause:	The company must stop the activity and provide or cooperate in remediation.
Contribute:	The company must cease its contribution, use leverage to mitigate the impact, and participate in remediation.
Directly linked to:	The company is not required to provide remedy but should use leverage to influence the responsible party and prevent recurrence.

### 3. Guidance

This section is structured as follows:

- Section 3.1 addresses human rights commitments and how to develop a human rights policy;
- Section 3.2 addresses how to embed HRDD in own operations and supply chains. The sub-section on own operations is further broken down into various human rights topics; and,
- Section 3.3 addresses grievance mechanisms and remediation of human rights impacts.

#### 3.1. Human Rights Policy Commitment

Tullow is committed to respecting human rights and has a Human Rights Policy in place, owned by the Tullow Board. We expect our suppliers to have a policy addressing human rights and labour conditions.

##### Key tips:

- Describe how HRDD is implemented in the company and identify responsible teams and oversight
- The commitment should come from above, obtain sign-off from the highest corporate function (usually CEO or board of directors)
- If a saliency assessment was conducted, include the most salient human rights risks into the policy, with a description of steps that are taken to address each
- Ensure that the policy covers all internationally accepted human rights, including those in the International Bill of Rights and the ILO Core Conventions.
- Make sure the policy is updated regularly or when there is a significant change in the business (e.g. acquisition, new product, or starting operations in a new market).

For further information see Appendix A and the references below.

<b>Relevant International Standards</b> <ul style="list-style-type: none"> <li>• UN Guiding Principles on Business and Human Rights (UNGPs)</li> <li>• OECD Guidelines for Multinational Enterprises (OECD Guidelines)</li> </ul>
<b>Further guidance</b> <ul style="list-style-type: none"> <li>• <a href="#">UN Guiding Principles Reporting Framework: Policy Commitment</a></li> <li>• <a href="#">UN Global Compact: How to Develop a Human Rights Policy</a></li> <li>• <a href="#">International Transport Workers' Federation -HRDD Guidance</a> (for seafarers on merchant vessels)</li> </ul>

## 3.2. Embedding Human Rights Due Diligence

In line with the UNGPs, Tullow expects its suppliers to implement HRDD in their own operations as well as their supply chains. In line with this expectation, this section covers both (i) measures that can be taken to manage human rights risks in own operations (further broken down into different human rights topics) and (ii) measures that can be taken to manage human rights risks in supply chains.

### 3.2.1. Own Operations

<b>Relevant International Standards</b> <ul style="list-style-type: none"><li>• UN Guiding Principles on Business and Human Rights (UNGPs)</li><li>• OECD Guidelines for Multinational Enterprises (OECD Guidelines)</li></ul>
<b>Further guidance</b> <ul style="list-style-type: none"><li>• <a href="#">IPIECA Human rights due diligence guidance: A practical guidance for the oil and gas, and alternative energy industry</a></li><li>• <a href="#">UNGC Germany, German Institute for Human Rights, twentyfifty - Assessing Human Rights Risks and Impacts</a></li><li>• <a href="#">Guidelines for MNEs - Organisation for Economic Co-operation and Development</a></li><li>• <a href="#">The Corporate Responsibility to Respect Human Rights – An Interpretative Guide</a></li><li>• <a href="#">International Transport Workers' Federation -HRDD Guidance</a> (for seafarers on merchant vessels)</li></ul>

### Non-discrimination and Equality

#### Key tips

- Create an inclusive environment free from discrimination, where individual differences and contributions are recognised and valued, and everyone is treated fairly.
- In line with international standards on responsible business conduct, maintain zero tolerance for any form of discrimination. Decisions related to recruitment, selection, development, promotion, or termination are based upon aptitude and ability only. Ensure decisions are not influenced by factors such as age, gender, sexual orientation, marital status, race, colour, ethnic origin, religion or belief, disability, or political views.
- Ensure policies and systems mandate treating workers with dignity, respect, and fairness, preventing harassment, discrimination, abuse, or inhumane treatment.
- Communicate equal opportunities policies in formats and languages understood by all staff.

<b>Relevant International Standards</b> <ul style="list-style-type: none"><li>• UN Guiding Principles on Business and Human Rights (UNGPs)</li><li>• OECD Guidelines for Multinational Enterprises (OECD Guidelines)</li><li>• The Tripartite declaration of principles concerning multinational enterprises and social policy (MNE Declaration)</li><li>• ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)</li><li>• ILO Declaration on Fundamental Principles and Rights at Work</li><li>• ILO Equal Remuneration Convention, 1951 (No. 100)</li></ul>
<b>Further guidance</b> <ul style="list-style-type: none"><li>• <a href="#">Principle 1</a> (Building Responsibly, supported by IPIECA): Workers Are Treated with Dignity, Respect, and Fairness</li><li>• <a href="#">UN Global Compact Business &amp; Human Rights Navigator: Discrimination</a></li><li>• <a href="#">World Economic Forum: Diversity, Equity and Inclusion 4.0: A toolkit for leaders to accelerate social progress in the future of work</a></li><li>• <a href="#">WEPS Gender Action Plan Template   WEPS</a></li><li>• <a href="#">WEP Closing Gender Pay Gaps to Achieve Gender Equality at Work</a></li><li>• <a href="#">A step-by-step guide to preventing discrimination in recruitment – Australia Human Rights Commission</a></li></ul>



## Fair remuneration

### **Key tips**

- Provide wages and benefits in line with or above industry standards and comply with local labour laws, including applicable minimum wage laws. At a minimum, wages should be enough to meet basic needs and to provide some discretionary income.
- Clearly communicate wages, benefits, deductions, and overtime pay details in workers' contracts.
- Ensure equal wages for work of equal value without any discrimination.
- Pay wages and benefits in full and on time, at agreed intervals.

#### **Relevant International Standards**

- ILO Protection of Wages Convention, 1949 (No. 95)
- ILO Wage Protection Recommendation, 1949 (No. R85)
- The Tripartite declaration of principles concerning multinational enterprises and social policy (MNE Declaration)
- International Finance Corporation Performance Standard 2 (IFC-PS 2)

#### **Further guidance**

- [Principle 8](#) (Building Responsibly, supported by IPIECA): Wages and Benefit Agreements Are Respected
- [ILO Helpdesk: Q&As on Business, Wages and Benefits](#)
- [WEP Closing Gender Pay Gaps to Achieve Gender Equality at Work](#)

## Working hours

### **Key tips**

- Ensure workers do not work beyond legal limits or recognised standards for regular or overtime hours.
- Define working hours by contract, not exceeding 48 hours per week, excluding overtime. Provide workers with at least one day off in every 7-day period.
- Ensure all overtime is voluntary and used responsibly. Compensate overtime at a premium rate, recommended to be at least 125% of the regular pay rate and in line with the local law. The basis for overtime calculation should be clear and understood by employees.

#### **Relevant International Standards**

- ILO Hours of Work Convention, 1919 (No.1)
- ILO Hours of Work Convention, 1930 (No. 30)
- Maritime Labour Convention (MLC), 2006 (for seafarers)

#### **Further guidance**

- [Principle 8](#) (Building Responsibly, supported by IPIECA): Wages and Benefit Agreements Are Respected
- [Ethical Trade Initiative \(ETI\): Base Code Guidance: Working hours](#)
- [UN Global Compact Business & Human Rights Navigator: Working Time](#)
- [International Transport Workers' Federation -HRDD Guidance](#) (for seafarers on merchant vessels)

## Forced labour

### **Key tips**

- Ensure that workers do not pay recruitment fees or related costs.
- Where possible, prioritise local recruitment over international recruitment to reduce the risk of human trafficking.
- Conduct thorough due diligence on recruiters and provide specific training for staff.

- Ensure workers have unrestricted access to their personal documentation (for example IDs and passports) and freedom to leave their employer after reasonable notice and immediately if the circumstances require it.
- Verify that workers have voluntarily consented to their employment terms and conditions.

#### Relevant International Standards

- ILO Forced Labour Convention, 1930 (No. 29)
- ILO Abolition of Forced Labour Convention, 1957 (No. 105)

#### Further guidance

- Tullow's Modern Slavery Statement
- [Principle 2](#) (Building Responsibly, supported by IPIECA): Workers Are Free from Forced, Trafficked, and Child Labor
- [ILO Helpdesk: Business and forced labour](#)
- [Institute for Human Rights and Business \(IHRB\): The Employer Pays Principle](#)
- [ILO indicators of Forced Labour](#)
- [Walk Free Foundation: Modern Slavery Response & Remedy Framework](#)

## Child labour

### Key tips

- Ensure that all workers meet the minimum working age under the relevant legislation, but in no case less than the ILO general minimum age – regardless of local custom or laws.<sup>2</sup> No one under 18 years old is allowed to work at a Tullow site.
- Ensure a robust age verification system.

#### Relevant International Standards

- ILO Minimum Age Convention, 1973 (No. 138)
- ILO Convention on the Worst Forms of Child Labour, 1999 (No. 182)

#### Further guidance

- [Principle 2](#) (Building Responsibly, supported by IPIECA): Workers Are Free from Forced, Trafficked, and Child Labour
- [ILO Helpdesk: Business and child labour](#)
- [UN Global Compact Business & Human Rights Navigator: Addressing Child Labour in Business Operations and Supply Chains](#)
- [ETI Base Code Guidance: Child Labour](#)
- [ILO-IOE child labour guidance tool for business: How to do business with respect for children's right to be free from child labour](#)
- [Child Labour Tool | Signs of Child Labour by the Alliance for Child Protection in Humanitarian Action](#)

## Health and Safety

### Key tips

- Provide a safe and hygienic working environment. Take adequate steps to prevent work-related accidents and injuries by minimizing inherent hazards.
- Identify and assess environmental, health, and safety (EHS) risks in business operations and conduct work activities in a manner consistent with international good practice. Tullow Safety Standard.

<sup>2</sup> Outside Tullow sites: The official minimum age in Ghana for apprenticeship is 15 years old or completion of basic school (Children's Act 1998); the official minimum age in Ghana for hazardous employment is 18 years old (Children's Act 1998)

- Establish and effectively implement safe systems of work.
- Implement a system for reporting and managing occupational incidents and near misses, ensuring thorough investigation and mitigation measures.
- Establish suitable EHS training arrangements, ensuring personnel are formally trained and competent to meet job, legal, and regulatory requirements.
- Empower all workers to stop work activities that they believe to be unsafe.
- Ensure emergency prevention, preparedness, and response arrangements are in place.

#### Relevant International Standards

- ILO Occupational Safety and Health Convention, 1981 (No. 155)
- ILO Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)

#### Further guidance

- [Principle 5](#) (Building Responsibly, supported by IPIECA): Working Conditions Are Safe and Healthy
- [ILO Helpdesk: Business, occupational safety and health](#)
- [UN Global Compact Business & Human Rights Navigator: Occupational Safety and Health](#)
- [World Bank Group Environmental, Health, and Safety Guidelines](#)
- [Danish Institute for Human Rights: Human Rights Compliance Assessment Tool - Workplace Health and Safety](#)

### Data Protection and privacy of personal information

#### Key tips

- Maintain the confidentiality of all personal information.
- Restrict access to personal information to authorised staff.
- Ensure all staff handling personal information are aware of and comply with relevant data protection laws.
- Implement appropriate measures to ensure and demonstrate that any personal data processing is performed in compliance with applicable laws.

#### Relevant International Standards

- ISO 27001:2022 Information Security Management
- [EU General Data Protection Regulation](#)

#### Further guidance

- [Secure personal data | European Data Protection Board](#)

### Freedom of Association and Collective Bargaining

#### Key tips

- Establish a culture of trust with genuine, inclusive worker representation that values all contributions.
- Allow workers to join or form trade unions and bargain collectively without distinction and in line with local law.
- Respect workers' freedom of association and identify barriers to inclusive representation, such as prohibitive laws or cultural norms, and develop strategies to overcome them. Identify vulnerable worker groups and develop appropriate communication channels, such as worker forums.

- Ensure language, literacy, or other social factors are not barriers to worker representation, especially for migrant labour groups.
- Ensure worker representatives are not discriminated against and can perform their representative functions in the workplace.

<b>Relevant International Standards</b> <ul style="list-style-type: none"> <li>• ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98)</li> <li>• International Finance Corporation Performance Standard 2 (IFC-PS 2)</li> </ul>
<b>Further guidance</b> <ul style="list-style-type: none"> <li>• <a href="#">Principle 9</a> (Building Responsibly, supported by IPIECA): Worker Representation is Respected</li> <li>• <a href="#">ILO Helpdesk: Business and collective bargaining</a></li> <li>• <a href="#">UN Global Compact Business &amp; Human Rights Navigator: Freedom of Association</a></li> <li>• <a href="#">ETI: FOA &amp; Worker Representation: Company Guidance</a></li> <li>• <a href="#">ETI: Implementing freedom of association - a five step plan</a></li> </ul>

### Local communities' health and safety and livelihoods

#### **Key tips**

- Continuously assess and mitigate risks to community health and safety throughout all business operations.
- Ensure all projects and operations adhere to safety standards and are certified by competent professionals.
- Implement strict protocols for the transportation, storage, and disposal of hazardous materials to prevent community exposure and adopt practices that minimize the risk of disease transmission, including improving environmental conditions.
- Develop and maintain robust emergency response plans in collaboration with local communities and agencies.
- Where business practices are likely to significantly alter the livelihood of a community, develop and implement livelihood restoration plans in partnership with community leaders and local organisations.

<b>Relevant International Standards</b> <ul style="list-style-type: none"> <li>• <a href="#">UN Resolution 76/300 (2022) on the right to a clean, healthy and sustainable environment</a></li> <li>• International Finance Corporation Performance Standard 4 (IFC-PS 4)</li> </ul>
<b>Further guidance</b> <ul style="list-style-type: none"> <li>• <a href="#">IFC PS 4 Guidance Note</a></li> <li>• <a href="#">Practical Tool for Business on Human Rights Due Diligence and the Environment (HRDD+E)   United Nations Development Programme</a></li> <li>• <a href="#">Anglo American Social Way toolkit: About Community Health and Safety (CHS)</a></li> </ul>

### Security, conflict and human rights defenders

#### **Key tips**

- Respect the human rights of human rights defenders, including their freedom of expression, peaceful protest, and assembly.
- Conduct background checks prior to hiring, to avoid hiring individuals or contracting with service providers that have a record of abuse.

- Evaluate potential security and human rights risks before starting operations—especially in high-risk or conflict-affected areas.
- Maintain open, inclusive, and culturally sensitive dialogue with local communities to build trust and identify concerns early.
- Ensure both public and private security personnel are properly vetted and trained on human rights standards, including the use of force and accountability.
- Incorporate human rights expectations into contracts with private security providers, including clear reporting and disciplinary procedures.
- Establish mechanisms to monitor security-related incidents and provide access to remedy. Investigate allegations of abuse and take corrective action.

#### Relevant International Standards

- [Declaration on human rights defenders | OHCHR](#)
- [Voluntary Principles on Security and Human Rights \(VPSHR\)](#)

#### Further guidance

[Principle 9](#) (Building Responsibly, supported by IPIECA): Worker Representation is Respected

- [UN Working Group on Business and Human Rights: Guidance on ensuring respect for human rights defenders](#)
- [VPSHR Guidance on Respecting the Rights of Human rights Defenders](#)

### 3.2.2. Supply Chain Due Diligence

As explained in section 2 above, businesses can be connected to human rights impacts, even when they are not the ones directly causing it. For instance, business may be connected to impacts caused by their suppliers in cases where their conduct directly enables (contribute) or if they benefit from the conduct causing the impact (linked to).

In line with international standards on responsible business conduct, Tullow expects that its suppliers will require the same level of risk-based human rights due diligence described in this document from their own suppliers.

#### Key tips:

- Assess human rights risks in your supply chain and apply risk-based due diligence to respond to identified risks, as outlined in the UNGPs
- When needed, prioritize higher risk scenarios and engage with business partners to increase awareness of human rights issues and ensure respect for human rights in the supply chain.
- To have a better understanding of risk profiles in your supply chain, use tools such as risk assessments, self-assessment questionnaires, document reviews, on-site visits, audits and other forms of assurance.
- Set-up effective grievance mechanisms that allow workers and communities in your supply chain to submit human rights concerns.
- Integrate clauses on human and labour rights into agreements with business partners and suppliers. See Appendix B for further guidance.

**Relevant International Standards**

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises (OECD Guidelines)
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**Further guidance**

- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
- [UN Global Compact: Supply Chain Sustainability - A practical guide for continuous improvement](#)
- [UNGC Germany, German Institute for Human Rights, twentyfifty - Assessing Human Rights Risks and Impacts](#) (Chapter 5)
- [Human rights due diligence guidance | Ipieca](#)
- [KnowTheChain: Good Practice Guide 2024 - Business & Human Rights Resource Centre](#)

### 3.3. Grievance Mechanisms and Remedy

#### 3.3.1. Developing effective grievance mechanisms

**Key tips**

- Encourage a culture where employees feel comfortable speaking up and ensure grievance mechanisms align with the United Nations Guiding Principles criteria.
- Implement grievance mechanisms that are accessible to all staff and allow raising issues confidentially and anonymously on topics such as living conditions, health and safety, wages and benefits, and discrimination and harassment.
- Ensure grievance mechanisms are accessible to all workers and other stakeholders in inclusive languages and formats.
- Clearly communicate the grievance process to all workers in a language and format they understand. Include guidance on access, process, and governance procedures (such as escalation or appeal).
- Listen to feedback and concerns, answer enquiries, and register grievances made by community members.

#### 3.3.2. Anonymity and non-retaliation

**Key tips**

- Commit to a working environment where concerns can be raised confidentially, are listened to, and acted upon without fear of retaliation.
- Ensure everyone is respected and concerns can be raised openly.
- Do not retaliate against anyone who raises an issue or concern in good faith.

**Relevant International Standards**

- UN Guiding Principles on Business and Human Rights (especially Pillar III)
- OECD Guidelines for Multinational Enterprises (OECD Guidelines)

**Further guidance**

- [Community grievance mechanisms in the oil and gas industry | Ipieca](#)
- [UN Global Compact Germany: Worth Listening - Understanding and implementing human rights grievance management](#)
- [Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights - Shift](#)
- [ITUC legal guide for setting up an operational-level grievance mechanism for the world of work in the context of business and human rights](#)
- [AIMprogress: Grievance Mechanism Maturity Framework](#)
- [ICMM - Handling and Resolving Local-Level Concerns and Grievances](#)



## Appendix A Background note Human Rights Policy

Tullow expects its suppliers to commit to the full scope of the International Bill of Rights and the ILO Declaration on Fundamental Principles. Here is what you need to know about these international standards and frameworks:

The International Bill of Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work are foundational documents that outline key principles and rights concerning human rights and labour standards.

### International Bill of Rights

The International Bill of Rights consists of three documents

- 1) **Universal Declaration of Human Rights (UDHR):** Adopted by the UN General Assembly in 1948, the UDHR sets out a comprehensive framework for human rights, encompassing civil, political, economic, social, and cultural rights.
- 2) **International Covenant on Civil and Political Rights (ICCPR):** The ICCPR is a binding treaty that establishes civil and political rights, including the right to life, freedom of expression, and fair trial procedures. It provides mechanisms for monitoring and enforcement by state parties.
- 3) **International Covenant on Economic, Social and Cultural Rights (ICESCR):** The ICESCR addresses economic, social, and cultural rights, such as the right to work, the right to education, and the right to an adequate standard of living.

For a full list of rights covered by the two Covenants, see: [International Bill of Human Rights | OHCHR](#). Together, the three documents form the cornerstone of international human rights law.

### ILO Declaration on Fundamental Principles and Rights at Work

The ILO Declaration on Fundamental Principles and Rights at Work was adopted by the ILO in 1998. It reaffirms the commitment of the ILO's member states to uphold core labour standards. These core principles include:

- 1) **Freedom of Association and the Effective Recognition of the Right to Collective Bargaining:** Workers have the right to form and join trade unions and to engage in collective bargaining with employers.
- 2) **Elimination of Forced or Compulsory Labour:** All forms of forced or compulsory labour, including slavery and human trafficking, should be abolished.
- 3) **Abolition of Child Labour:** Children should not be subjected to any form of exploitation or economic activity that interferes with their education or harms their health or development.
- 4) **Elimination of Discrimination in Employment and Occupation:** All individuals should have equal opportunities and treatment in employment, free from discrimination based on race, gender, religion, disability, or other factors.

### Why Tullow suppliers should include a commitment to these standards

- **Comply with expectations set in the [UN Guiding Principles on Business and Human Rights](#):** The UNGPs stipulate that “responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work... These are the benchmarks against which other social actors assess the human rights impacts of business enterprises.” This means, all policies, whether standalone or integrated, should at minimum include a commitment to these standards.
- **Consistency with Industry Standards:** Tullow adheres to these human rights and labour standards. For suppliers, aligning with these commitments is essential not only to maintain strong partnerships but also to demonstrate a commitment to responsible business.

## ***Tullow's Human Rights Policy***

We respect internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. We seek to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Voluntary Principles on Security and Human Rights.

### ***UNGPs Policy commitment 16.***

As the basis for embedding their responsibility to respect human rights, business enterprises should express their commitment to meet this responsibility through a statement of policy that:

- a. Is approved at the most senior level of the business enterprise;
- b. Is informed by relevant internal and/or external expertise;
- c. Stipulates the enterprise's human rights expectations of personnel, business partners and other parties directly linked to its operations, products or services;
- d. Is publicly available and communicated internally and externally to all personnel, business partners and other relevant parties;
- e. Is reflected in operational policies and procedures necessary to embed it throughout the business enterprise.

## Appendix B Integrating clauses on human and labour rights into agreements with business partners and suppliers

Tullow expects its suppliers to integrate clauses on human rights and labour rights into agreements with their business partners and suppliers.

### How to start

Begin by including a clause that requires your business partners and suppliers to adhere to recognised human rights and labour standards. Start by requiring your business partners and supplier to adhere to your Supplier Code of Conduct as well as internationally recognised human right standards.

- **Supplier Code of Conduct:** Require suppliers and business partners to adhere to your Supplier Code of Conduct that reflect your commitment to internationally recognised human rights standards.
- **International Standards:** Ensure that your suppliers commit to internationally recognised human rights standards, including the International Bill of Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

**Why is this important?** The International Bill of Rights and the ILO Declaration on Fundamental Principles and Rights at Work are foundational documents that outline key principles and rights concerning human rights and labour standards. This foundational clause sets clear expectations for behaviour, ensuring that all parties in the supply chain operate under the same standards.

### Example:

1. Maersk: Maersk General Purchasing Conditions for Goods and Services

#### 9. Responsible Procurement

**Code of conduct.** In addition to the obligations of Clause 8 above, Supplier shall respect and commit to implement the Maersk Third Party Code of Conduct (the "Code") as amended from time to time and found at <http://www.maersk.com/about/sustainability/third-party-code-of-conduct> or alternatively an internationally recognized standard within the areas of human rights, anti-corruption, environment and labour, such as but not limited to United Nations Global Compact (UNGC), and Supplier agrees – if and when so requested - to provide necessary documentation as well as

accommodate any audit by Buyer in order to verify the same. The Supplier shall require their own suppliers to implement similar rules and, as appropriate, pass on such requirements to their sub-suppliers and so on. Supplier's non-compliance with this Clause 9 shall be considered a material breach of the Agreement. The original English version of the Code (as of August 2013) shall prevail in the event of any disputes or discussions concerning the content and obligations of either Party. Should the Supplier be unable to meet the listed requirements, the Supplier will agree to develop and execute an improvement plan.

2. Unilever: Purchase agreements states that suppliers shall comply with Unilever's Responsible Sourcing Policy

The Fundamental Principles that create the foundation of our Responsible Sourcing Policy are grounded in internationally recognised standards. We endorse the UN Guiding Principles on Business and Human Rights and are embedding them throughout our operations. In line with the Fundamental Principles, we base our Human Rights commitment on the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labour Organization's fundamental conventions on Rights at Work. We support the OECD Guidelines for Multinational Enterprises.

#### The Fundamental Principles are:

1	Business is conducted lawfully and with integrity
2	Work is conducted on the basis of freely agreed and documented terms of employment
3	All workers are treated equally and with respect and dignity
4	Work is conducted on a voluntary basis
5	All workers are of an appropriate age
6	All workers are paid fair wages
7	Working hours for all workers are reasonable
8	All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively
9	Workers' health and safety are protected at work
10	Workers have access to fair procedures and remedies
11	Land rights of communities, including indigenous peoples, will be protected and promoted
12	Business is conducted in a manner which embraces sustainability and reduces environmental impact

We will only work with suppliers who share our values and comply with our Responsible Sourcing Policy. They must also agree to ensure transparency, to remedy any shortcomings, and to drive continuous improvement under the Fundamental Principles that create the foundations to this Policy. While we expect our suppliers to fulfil the Mandatory Requirements, we also aim to recognise suppliers who make committed progress towards the best practices of responsible sourcing as embodied in the Continuous Improvement Benchmarks provided.

Our Responsible Sourcing Policy specifies requirements, establishes milestones and provides benchmarks for each component of the Fundamental Principles.

## How to progress

An advanced clause involves creating a mutually agreed code of conduct between the buyer and supplier, promoting shared responsibility. Work with your suppliers to outline clear obligations for both sides. According to the Responsible Contracting Project, agreements between buyers and suppliers should focus on the following principles:

1. Commitments from both parties to conduct Human Rights and Due Diligence
2. Commitment by the buyer to purchasing practices that support effective Human Rights and Due Diligence, such as fair pricing and lead times
3. Commitment by both parties to provide remedy

Example: In 2023, Hapag-Lloyd, a German shipping company, updated its Supplier Code of Conduct to reflect core principles of shared responsibility between buyers and suppliers. This includes a commitment to responsible purchasing practices and ensuring that adverse impacts are prevented and remedied.

### Cooperation

We and our suppliers will have a greater impact on, and a better chance of identifying, preventing, mitigating, and remediating adverse human rights and environmental impacts in our organisations and supply chains by working together and assuming our common responsibility towards business ethics, human rights, and the environment. The value of cooperation is crucial in the engagement of stakeholders at different levels and creating leverage with, e.g., peer companies and rightsholders to improve human rights and environmental conditions. The SCoC parties commit to act and react constructively, cooperatively, and with due diligence, regarding the principle of cooperation.

### Notification of Incidents and Remedial Action

If the supplier becomes aware of any actual or imminent breach of its own obligations under this SCoC or within its supply chain, the supplier must immediately take appropriate remedial action(s) and immediately inform Hapag-Lloyd through the Complaints Mechanism described below. The supplier must further inform Hapag-Lloyd of any official investigation procedure in this regard.

Hapag-Lloyd will contact its supplier as soon as possible after being notified by the supplier, or after the discovery of an incident through other channels and will require and support the supplier to terminate the violating practice. Hapag-Lloyd commits to taking appropriate preventive and remedial action, joining forces with its suppliers.