

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 reviewed and approved by the Board of Tullow Oil PLC (the 'Board').

This Statement is made in respect of the financial year ending 31 December 2025. The Statement outlines the steps we took to manage 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 and gas exploration and production company, headquartered in the United Kingdom (UK) and listed on the London and Ghanaian stock exchanges.

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 and 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. This includes 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 improving access to supply chain opportunities for local suppliers.

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.
- Our **Human Rights Standard** provides actionable guidelines for implementing the principles in the Human Rights Policy.

5. Risk Assessment and Due Diligence

Operations

Tullow seeks to meet the commitments in its Human Rights Policy by identifying and assessing the potential for Human Rights risks and 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 Procedure and Ethics & Compliance Due Diligence 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 collaborating with suppliers to enhance their own due diligence programmes is a critical component to understanding and addressing the risks that lie within supply chains. For 2025, selected suppliers completed a self-assessment form (SAF). The self-assessment process determines supplier compliance with the modern slavery clauses in their contracts. The responses to the self-assessments and our independent evaluation of the suppliers enable us to identify areas for further engagement on improvement actions, training and prioritisation of suppliers to audit.

Tullow's standard form procurement contracts include specific references to compliance with applicable anti-slavery and human trafficking laws. We also ensure that provisions dealing with these matters are also included in all supply chain contracts we sign (even if such contracts are not concluded on Tullow's standard form).

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 may have been breached. This includes an independent external reporting mechanism for raising concerns, which provides an opportunity for reporters to remain anonymous. All reports are investigated. Through these processes we received four Human Rights supplier-related grievances in 2025 which were investigated to ensure effective remediation was provided. The grievances related to fair wages, late payment of wages and working hours.

In addition, we have community grievance mechanisms to manage and resolve grievances that arise in relation to Tullow's operational activities. An online tool has been developed and implemented in 2025 which has helped to improve the recording of community grievances and assist in speedier resolution.

6. Assurance

Following a supplier prioritisation exercise in 2025, we rolled out Supplier Self-Assessment Forms (SAFs) to 16 additional suppliers, achieving an 81% response rate with plans to have the outstanding suppliers complete the SAFs. We also reviewed responses from the 2024 self-assessments, prepared improvement plans and have prioritised working with suppliers to strengthen their Human Rights policy commitments and providing further training to suppliers in 2026. All the high-risk suppliers identified in 2024 have written human rights commitments.

We published the **Good Practice Guidance on Human Rights for Suppliers** guideline document and shared it with our suppliers for the purpose of providing suppliers with a repository of tips and good practices on how to ensure Human Rights in their operations and supply chains are respected.

7. Assessing effectiveness

Tullow monitors the effectiveness of its efforts to combat modern slavery through multiple mechanisms, including Tullow's Board, 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 and skill sets. The Working Group provides us with the opportunity to take a company-wide approach to monitoring the effectiveness of our programmes. The Working Group includes members from the ethics and compliance, legal, supply chain, human resources, environment, health and safety, internal audit, social performance and sustainability management functions.

In 2025 the Working Group continued to track implementation progress of the eight salient issues identified in the 2023 human rights saliency assessment. Our efforts in supply chain build on the labour rights salient issue action plan, by focusing on non-discrimination, and safe and healthy working conditions, and on eliminating forced labour and child labour.

The Working Group standing agenda includes a performance update and a broader review of recent due diligence activities, the effectiveness of our programmes 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 three times in 2025 with key agenda items including reviews of:

- external Human Rights trends;
- Human Rights grievances and risks; and
- salient Human Rights issue action plans, including the labour rights action plan.

8. 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 2025 we achieved 100% completion by staff of the Code eLearning programme.

We delivered Human Rights training to 40 Tullow staff members, including contract holders and contract advisors responsible for contracts classified as high-risk from a Human Rights perspective. The training aimed to equip them with the skills to review supplier Human Rights self-assessments and to understand the follow-up actions required from suppliers, ensuring clarity on

Tullow's expectations regarding Human Rights. We also organised similar training for 100 high-risk suppliers identified through the self-assessments process. These suppliers were guided through the process and supported on how to address and close the gaps outlined in the improvement plans agreed during their SAF evaluation meetings.

In 2025, an additional 20 suppliers completed International Petroleum Industry Environmental Conservation Association (IPIECA) labour rights training.

9. Next steps

In 2026 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 which include the following metrics:

- reviewing and assessing the responses from supplier SAFs and conducting two supplier labour rights onsite audits;
- monitoring progress on improvement plans and working with suppliers to strengthen Human Rights commitments;
- reviewing the number of Human Rights related speak up complaints received and assessing the findings and the resulting actions; and



Signed by Ian Perks

Chief Executive Officer (CEO), on behalf of the Board of Tullow Oil PLC