

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').

Introduction

Tullow Oil PLC ('Tullow') and its subsidiaries (together, the 'Group') is committed to the requirements of the Act and respecting internationally-recognised human rights – including fundamental labour rights and international labour standards as set out in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We recognise that the nature and context of our business – which is often based in remote areas in developing countries – exposes our organisation and supply chain to the potential risk of instances of modern slavery and human trafficking, including underage, forced or bonded labour. We work to regularly assess the extent of this risk and to take steps to ensure that modern slavery is not taking place in Tullow's business or supply chain.

About Tullow

Tullow Oil PLC is a leading independent oil & gas exploration and production company, headquartered in the United Kingdom (UK) and listed on the London, Irish and Ghanaian stock exchanges. Our portfolio of over 30 licences spans eight countries.

Our Supply Chain

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

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.

Governance, Policy and Standards

Tullow Oil PLC 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.



Modern Slavery Act Transparency Statement (Continued)

Governance, Policy and Standards (continued)

- Our Code of Ethical Conduct (the 'Code') – which applies to Tullow's directors, employees and contractors, agency or temporary workers (hereafter Tullow staff) – prohibits the use of underage, forced or bonded labour, and sets out our expectations on 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 minimum requirements for the placement of contracts for goods, works and services, and our Group Supplier Due Diligence (DD) Procedure sets out DD requirements in respect of human rights and labour conditions. In 2018, Tullow updated its standard form procurement contract templates to include specific references to compliance with applicable anti-slavery and human trafficking laws.

Due Diligence (DD) and Assurance

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.

We have a supplier audit programme focused on high and medium risks contracts in place to address risks related to business ethics and compliance (E&C), including human rights and labour conditions. The results of such audits may, if needed, generate a requirement that suppliers improve their human rights and modern slavery controls. Whilst there were no supplier audits carried out in 2021 that specifically covered human rights and labour conditions, we introduced a signed 'Tullow Code of Ethical Conduct - Supplier Declaration' for suppliers identified as high-risk following DD review.

Our 'Speak-Up' mechanism is designed to provide Tullow staff, and anyone performing services for 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 reporting, which provides an opportunity for reporters to remain anonymous, and all reports are promptly and fully 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 terms and conditions, health and safety, working environment or bullying and harassment.

Training

All Tullow staff are required to complete the company's annual Code of Ethical Conduct e-learning course, which was developed to ensure greater awareness of the Code's requirements and support application of the Code in our day-to-day activities. During 2021, Tullow carried out DD training within our Supply Chain Management (SCM) function to reinforce awareness of the processes in place to prevent modern slavery in our supply chain and we also carried out supplier training sessions on E&C and human rights, with suppliers from Ghana and Guyana.

Sessions included explaining Tullow's commitments to human and labour rights.



Modern Slavery Act Transparency Statement (Continued)

Training (continued)

In addition to this training, we appointed 18 E&C Ambassadors across the business. Their role is to support Tullow's core E&C team and program; driving continuous improvement in our risk-based processes and controls; and, most importantly, further promoting an ethical culture.

Next steps

In 2022, we will continue to emphasise to our staff and suppliers that our commitment to ensuring that modern slavery and human trafficking is not part of our supply chain, including via a planned programme of supplier awareness sessions on a need or periodic basis.

We also intend to relaunch the Supplier Declaration as a 3rd party Standards and Declaration for high-risk suppliers, commence the conduct of worker welfare inspections and roll out on-line worker welfare training, which has been developed by the International Petroleum Industry Environmental Conservation Association (IPEICA) and Building Responsibly. This training will be rolled out to staff across our E&C, SCM, Environment, Health and Safety (EHS), Social Performance and Human Resources functions, as well as other high-risk suppliers and their respective contract holders.

In 2022, Tullow's approach to reporting under the Modern Slavery Act will also be developed by a working group coordinated by the Sustainability function, with resources from other key functions across the businesses.

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

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



Rahul Dhir
Chief Executive Officer - Tullow Oil plc
July 2022