

# 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 2024. 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 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, 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.
- Our **Human Rights Standard** provides actionable guidelines for implementing the principles in the Human Rights Policy.

In 2024 we updated our Human Rights Policy, including strengthening our commitment to International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

#### 5. Due Diligence

##### 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 collaborating with suppliers to enhance their own due diligence programs is a critical component to understanding and addressing the risks that lie within supply chains. For 2024, 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 engagement on improvement actions, 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 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. In addition, we have operational-level grievance mechanisms to manage and resolve grievances that arise in relation to Tullow's activities which include community focused grievance mechanisms. 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.

In 2024 we received four human rights supplier-related grievances which were investigated to ensure effective remediation was provided. The grievances related to fair wages, late payment of wages, working hours and discrimination. We also reviewed our community grievance mechanisms against the United Nations Guiding Principles effectiveness criteria. One of the outcomes of the review was the development on an online tool to improve the recording of grievances and drive speedier resolution of grievances.

## 6. Assurance

Following a supplier prioritisation exercise in 2023, we reviewed our supplier base and identified 16 additional suppliers with potentially high exposure to modern slavery risks. We rolled out supplier self-assessment forms to the additional suppliers, achieving an 81% response rate. We also reviewed responses from the 2023 self-assessments, prepared improvement plans and have prioritised working with suppliers to strengthen their human rights policy commitments and providing further training in 2025.

We also conducted four human rights on-site visits in 2024 to calibrate 2023 self-assessment responses with actual human rights' practices. Opportunities for improvement were identified including working with suppliers on strengthening their human rights commitments.

## 7. 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, social performance and sustainability management functions.

To enhance our approach to monitoring effectiveness through the Working Group, in 2023, we conducted a human rights saliency assessment which identified eight salient issues. Action plans have been developed for five of the salient issues, and in 2024 the Working Group continued to track implementation progress. 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. A summary of the progress made in managing the salient issue action plans has been disclosed in Tullow's 2024 sustainability report.

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 four times in 2024 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.

Following a review of the completed self-assessments in 2024, 28 supplier virtual interviews and the on- site supplier assurance visits, we amended the requirement for supplier self-assessments from annually to every two years. The extra time will be used to work with suppliers to close the identified gaps.

## 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 2024 we achieved 100% completion by staff of the Code eLearning programme.

We also held a human rights Q&A session followed by social and human rights training, both facilitated by external human rights and social experts, and attended by more than 55 leaders in Tullow. The purpose of the sessions was to roll out the updated human rights policy, supporting requirements set out in the human rights standard and discuss human rights and social scenarios likely to be encountered in their day-to-day work, including working with suppliers on labour rights. In addition, we held a feedback session with suppliers to thank them for their efforts in completing self-assessments and to share common findings from the process.

In 2024, more than 80 suppliers completed International Petroleum Industry Environmental Conservation Association (IPIECA) labour rights training.

## 9. Next steps

In 2025 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:

- monitor progress on the actions included in the salient issue action plans;
- monitor progress on improvement plans and work with suppliers to strengthen human rights commitments;
- review and assess the number of human rights related speak up complaints received, the findings and the resulting actions; and,
- roll out IPIECA labour rights training to suppliers.

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



Signed by Richard Miller,  
Interim Chief Executive Officer (CEO), on behalf of the Board of Tullow Oil PLC