

THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS
(“VPSHR”, “Voluntary Principles” or “VPs”)
Tullow Oil plc
2020 Summary Report

INTRODUCTION

Tullow have implemented the Voluntary Principles on Security and Human Rights since 2010, was admitted as a participant in March 2013 and were members of the Steering Committee (including chairing the Corporate Pillar) from March 2019 to March 2020. Tullow has also led the implementation of the VPs in Ghana and has pioneered the relationship between international and local security companies in Kenya.

In Ghana we work with the navy to protect our offshore facilities and used the VPs approach to engage with local fishermen to develop a safe sea access framework. This has provided a way for local fisherman to operate safely in the areas around our offshore facilities but reduce incursions into the safety zones.

In Kenya, we work with the Kenyan Police Service (Critical Infrastructure Protection Unit - CIPU) to manage the security of our sites and have engaged with local communities to assure their support and collaboration, while addressing their concerns and expectations. With private security companies, we have applied the VPs and included the requirements of the International Code of Conduct Association in our contracts with service providers.

Tullow Kenya has designed a security contract localisation process which uses an innovative/industry leading model that uses support (requirement is embedded in the contract) from an international security company to partner with a local (Turkana) based private security company to build local capacity and assist with achieving international VPs compliant certification.

Implementing the principles enables Tullow to meet the requirements of our own code of conduct but also provides an effective way to secure our sites and minimise the risk of disruption to operations through building relationships with local communities based on trust and dialogue.

COUNTRY IMPLEMENTATION

West Africa - Ghana

Operational Overview

Tullow Ghana produces oil and gas from two operated deep-water developments, Jubilee and TEN. The Jubilee Field is approximately 60 km offshore the Western Coast of Ghana and has been in production since December 2010. The Tweneboa, Enyenra, Ntomme (TEN) Fields are 20 km to the west of Jubilee and have been in production since August 2016. Both developments are served by separate Floating Production, Storage and Offtake (FPSO) vessels.

As part of the operational support for these offshore activities, Tullow Ghana uses multi-role Environmental, Health & Safety and Security (EHS&S) vessels to conduct safety and security operations. The vessels have a Ghana Navy Task

Force onboard to help enforce the authority contained within the relevant legal and policy framework.

The VPs are implemented by Tullow in West Africa in the following ways:

Public Security

Assurance and monitoring of public security activity is provided by Tullow Ghana personnel employed as Offshore Environmental Health Safety and Security Coordinators (OEHSSCs). As part of this assurance and before every 28-day deployment, the OEHSSCs use scenarios, involving interactions with artisanal fishermen, to give the Ghana Navy detachment a better understanding of the practical application of the requirements of the VPs. These briefings continue throughout the deployment.

Private Security

The private security contractor is managed in accordance with the Group VPS Implementation Guideline.

Civil Society

VPs communication and education are led by the Social Performance team in selected coastal/fishing communities.

During the last 12 months a digital Stakeholder Engagement Plan was developed in response to the Covid19 pandemic. The usual quarterly engagement and social gatherings; workshop, durbar, school's sessions were all halted following the directives and safety protocols mandated by the President of Ghana and the Tullow EHS team. The Social Performance team in keeping to their mandate of maintaining good relationships and business continuity, adopted an approach of phone calls and radio engagements to demonstrate Tullow Ghana's commitment to VPSHR across the frontline impacted communities.



During the last 12 months stakeholder engagement focused on:

- Traditional Authorities
- Fishermen

- Fisheries Commission
- Ghana National Canoe and Fishermen Council
- Marine Police
- Local Government Authorities (Municipal Metropolitan District Assemblies)
- NGOs and CSOs in Western Region
- Petroleum Commission
- Integrated Geoscience Limited.

Community Liaison Officers (CLOs) employed by Tullow Ghana communicate and explain the offshore risks to fishermen, the Group's way of working with regards to prevention of intrusion and the reasons why there is a need to ensure the safety and security of the offshore installations and support marine assets. This capability was enhanced in preparation for the Jubilee drilling programme. The Social Performance Team developed and agreed a community engagement plan with the Petroleum Commission. This plan was implemented by holding advance engagement with the leadership of fishing communities and Ghana National Canoe Council and Fishermen Council. Face to face engagement was held with chief fishermen, local leadership and some canoe owners in 30 critical fishing communities. This was followed by the hanging of banners with information on the drilling campaign and daily broadcasting of the information on community radio stations throughout the drilling.

VPs Commitment

Tullow Ghana has been a strong advocate and subscriber of the VPs in Ghana since 2010 (providing VPs training to public security forces).

East Africa – Kenya

Operational Overview

The Group acquired its first Kenyan acreage in 2010 and made its first oil discovery in 2012. Further exploration success followed in the South Lokichar Basin (located in Turkana County, North West Kenya).

In mid-2018 crude oil produced from injection and production testing during the appraisal phase at the Amosing and Ngamia fields, started being transported by truck to Mombasa Port, as part of

the Early Oil Pilot Scheme (EOPS). However, in 2020 Tullow Kenya and its partners made the decision to suspend operations. This was a business decision and also due to Covid-19 restrictions.

Activities in the field during 2020 were limited and centered on closing operations, closing camp and maintenance/protection of field assets.

The security risks in Tullow Kenya's areas of operations relies on a combination of armed public security and unarmed private security services. The Government of Kenya deploys a mixture of National Police Service officers drawn from the Kenya Police Service, Administration Police Service and National Police Reserve. Unarmed private security at our operational sites is provided by a local security company who are being mentored by a security company with international experience.

Assurance and monitoring of security operations is provided through our directly-hired security personnel and contract field-based security advisors, who work in close cooperation with local and regional police leaders.

The VPs are implemented by Tullow in East Africa in the following ways:

Public Security

Tullow Kenya reflects its commitment to the VP's by operating with the Kenyan National Police Service in accordance with an MOU. The MOU incorporates the VPs guidance and recognizes the contextual nuances of security and policing in Northern Kenya, such as early conflict warning and response, and alternate dispute resolution mechanisms.

- VPs training for previously untrained National Police Reservists (NPRs) deployed to Tullow Kenya's operations was scheduled for second half of 2020 but did not happen due to country wide Covid 19 restrictions.
- VPs quarterly refresher trainings public (armed) security providers were not held due to Covid 19 restrictions.
- Close relationships were maintained with the Lokichar Critical Infrastructure Police Unit (CIPU)

detachment allowing for regular engagement on VPs-related issues.

- Daily formal meetings were held with the National Police Liaison Officer (NPLO).
- Tullow Kenya's External affairs and Social Performance Team conducted regular outreach to local communities, as well as engaging with local civil society organisations. These outreach activities provided a platform to discuss security issues, allow communities to raise issues that they may have and allow Tullow Kenya to remind attendees of the with mechanisms in place to provide access to remedy.
- Formal engagement sessions were held with local National Police Service deployments who are not directly engaged in Tullow Kenya operations through the Sub-County Security and Intelligence committees (Turkana East and Turkana South Sub-counties). This included creating awareness of Tullow Kenya Use of Force guidelines.

Private Security Providers

Our local private security provider, supported by our international private security provider, are required to achieve ISO 18788:2015 Management System for Private Security Operations certification as part of their contractual obligations. The unarmed (private) security providers continued to be trained on the VPs as part of their contractual obligations. Tullow Kenya maintained contact with ICoCA and DeCAF (Democratic Control of Armed Forces).

Africa, Caribbean & Latin America - Exploration

Operational Overview

The Exploration business has changed significantly during the year, with the closure of Tullow's Dublin and Cape Town offices bringing all staff within a unified organisational structure from the London office. Exploration activities during the year were limited to onshore seismic acquisition in Cote d'Ivoire, offshore exploration drilling in Suriname and a non-operated offshore multi-client seismic survey in Argentina. The Exploration business has refined its former focus to include both frontier and infrastructure led exploration in Africa and South America. Core staff members from the corporate centre, and contingent specialist resources, will be drawn upon as needed to review and advise on security and human rights

related risks for Exploration activities going forward.

In 2020 the only operated exploration activity was undertaken for onshore seismic acquisition in Cote d'Ivoire and offshore drilling in Suriname.

VPs Commitment For all operations and activities undertaken, proportionate public consultation was held prior to, during and post operations, and liaison maintained with public security where appropriate, with a strong focus on contractor management with respect to the use of private security.

Cote D'Ivoire (onshore) – 2D Seismic Operations

Tullow continued engagements from Regional to Village level in the Project Area of Influence for the first two phases of the project. This included consultation on the approach to Land Access and Grievance Management to ensure support and incorporate feedback from all levels of leadership in the Project Area. In addition, Tullow implemented a procedure specific to the transport and use of explosives for the project which required the participation of public and private security providers and local police support at various stages throughout the project.



Suriname (offshore) – Drilling (exploration Well).

Regular consultation was held with National and Local Government Agencies, Other Operators, and local Industry Representatives before and during operations. Notification to members of the public and other interested parties was made via the relevant Government Agencies. During appropriate stages of well operations a dedicated Marine Mammal Observer (MMO) was utilised to ensure seismic while drilling was conducted in accordance with Tullow's commitments and JNCC guidelines; a full MMO report was shared with the appropriate Government Agencies. In addition, a full Environmental End of Well report for each well was submitted to National Environment Protection Agency (NEPA).