

THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS
(“VPSHR”, “Voluntary Principles” or “VPs”)
Tullow Oil plc
2021 Summary Report

INTRODUCTION

Tullow has 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.

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. Tullow Ghana uses a number of multi-role Environmental, Health & Safety and Security (EHS&S) vessels to conduct safety and security operations including a dedicated Ghana Navy Ship.

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 partner with local security companies and have applied the VPs and included the requirements of the International Code of Conduct Association in our contracts with service providers.

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.

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 EHS&S vessels consist of two Anchor Handlers (Flat Confidence and Lewek Scarlet) and a Ghana Navy Ship with a compliment of Naval personnel and a Tullow representative to ensure compliance with relevant legal and policy framework.

Three key operational targets in 2021, to; complete single offloading line system project and firm-up second line plan for 2022 as a key millstone for Oosys, ensure first well ready for hand over to operations in July and two other wells online by end of August 2021 and finally, to increase Jubilee gas handling capacity to 204 MMscfd before end of first quarter were set.

Actualisation of these targets as well as increasing the overall oil production in 2021, necessitated a drilling campaign of four wells; JAH-P, J55-WI, NTB-GI and JL-P wells. These activities required full cooperation of fishermen in adherence to the Exclusive and Advisory Zones restrictions of the Jubilee field. Hence, enforcement of Voluntary Principles Security and Human Right by the Social Performance and the Asset Protection Teams were done as follows:

Public Security

In view of the growing maritime security threat in the Gulf of Guinea, the Government of Ghana has acquired four (4) Naval vessels for the Ghana Navy

to provide offshore security. One of the Naval vessels has been assigned to Tullow offshore concession. In ensuring that the Navy comply with relevant legal instruments and VPs, the Asset Protection Team carried out a risk assessment on the identification of security risks, potential for violence, human right records, rule of law, and conflict analysis with the Navy and other security stakeholders.

Additionally. Offshore Environmental Health Safety and Security Coordinators (OEHSSCs) conducted pre-deployment training on the use of force and reporting/investigating allegations of human rights abuses for public security agencies prior to each offshore deployment. Public security personnel was also screened for human right violations before being allowed to work at Tullow operational areas.

Assurance and monitoring of public security activity were 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 used 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 continued throughout the deployment.

Private Security

The private security contractor was managed in accordance with the Group VPS Implementation Guideline. There were monthly inductions on Voluntary Principles Security and Human Right.

Civil Society

The Social Performance Team held two meetings with the Network for Western Region NGOs (WERENGO).



Tullow team with the WERENGO

Communities

The Social Performance Team with support from the Community Liaison Officers employed by Tullow, organised twenty-seven (27) meetings with impacted communities. These meetings focused on providing operational update and enforcement of VPs within Tullow's jurisdiction. These were done through physical meetings, radio discussions and audio airings (jingles).

Key messages of these engagements were translated into local dialects and were recorded for continuous airings at critical communities. Target audience for these engagements remained the fishermen, fishmongers, canoe owners and crews, chief fishermen, traditional leaders, youth groups, local government authorities and key institutions including the Fisheries Commission, Petroleum Commission, Ghana Navy, and Marine Police.



Tullow team with communities giving operational updates

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).

Activities in the field during 2021 were limited and centered on closing operations, maintenance and 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 advisor, 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.

Only VP trained National Police Reservists were deployed to Tullow Kenya operations.

VPs quarterly refresher trainings public (armed) security providers were not held in 2021 due to Covid 19 restrictions and significant reduction of operational activities and personnel in the Kenya field operations. However, all armed personnel stationed at Tullow Kenya operations have been trained in the past.

Close relationships were maintained with the Critical Infrastructure Protection Unit (CIPU) detachment of the National Police Service allowing for regular engagement on VPs-related issues.

Daily formal meetings continue to be held with the National Police Liaison Officer (NPLO).

Tullow Kenya's 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 is ISO 18788:2015 certified. The unarmed (private) security providers have been trained in the past on the VPs. However no training was carried out in 2021 due to Covid 19 restrictions and significant reduction of operational activities and personnel.

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 demobilisation in Côte 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, are drawn upon as needed to review and advise on security and human rights related risks for Exploration activities going forward.

In 2021 the only operated exploration activity was undertaken for the demobilization of an onshore seismic acquisition programme in Côte 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.

Côte d'Ivoire (onshore) – 2D Seismic Operations

This year we completed the demobilization of our onshore seismic crew in Côte d'Ivoire. The project had commenced in 2019 but due to the pandemic all field operations were suspended in early 2020, with the full repatriation of our international crew achieved by mid-2020. During the period of suspended operations, a comprehensive assessment of subsurface prospectivity was undertaken, incorporating newly acquired seismic data from the project. This ultimately resulted in the decision to terminate the acquisition and hence demobilize the project. The demobilization phase involved the restoration of camps and survey lines along with associated crop owners' compensation and comprehensive engagement with all stakeholders. We also worked closely with the Ministry of Defence and Army, Ministry of Mines, private security contractors and our contractor to safely close down and restore field magazines which had been used to store explosive charges for the seismic acquisition, and further to organise and execute the disposal of

remaining dynamite stocks through burning, a first for the country and without any recorded security or health and safety incidents.

Suriname (offshore) – Drilling (exploration well).

Tullow Suriname drilled an offshore exploration well GVN-1 in Block 47 in Q1. 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).