

**THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS**  
**(“VPSHR”, “Voluntary Principles” or “VPs”)**  
**Tullow Oil plc**  
**2022 Summary Report**

## **INTRODUCTION**

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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 from March 2019 to March 2020.

In Ghana, we work with the Ghana 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 multi-role support vessels to conduct safety and security operations including a dedicated Ghana Navy Ship.

In Kenya, we work with the Kenyan Police Service, the 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**

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### **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 support vessels to conduct safety and security operations. The support 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.

Tullow operates the Jubilee and TEN fields which produced, on average, more than 44,000 barrels of oil per day, net to Tullow. In support of this production and in order to improve operational

efficiency there was a move to self-operate the Jubilee FPSO in 2022. The Jubilee Southeast Expansion Project also commenced in 2022 and the team continued the successful drilling campaign. These activities required full cooperation of fishermen in adherence to the Exclusive and Advisory Zones restrictions of the Jubilee and TEN fields. Hence, enforcement of Voluntary Principles Security and Human Rights by the Social Performance and the Asset Protection Teams were done as follows:

#### **Public Security**

The Gulf of Guinea security threat remains but the number of incidents in 2022 declined due to the collaboration of the local Navy with some international Navies and organizations. We have seen a decline from 61 incidents in 2018 to 13 incidents in 2022 but the region remains a hotspot for piracy.

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 Ghana’s 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, reporting and investigating allegations of human rights abuses for public security agencies prior to each offshore deployment. Public security personnel were also screened for human rights violations before being allowed to work at Tullow operational areas.

Assurance and monitoring of public security activities 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.

### **Engagement with Fishing Communities**

Focusing on the fishermen as a major stakeholder group, the Social Performance Team in 2022, organized a series of workshops across all the major fishing communities fronting the Jubilee and TEN operations. The main agenda for these meetings were to discuss collaborations amongst canoe crew and offshore security patrol team. The leadership of the Ghana National Canoe Fishermen Council and the Ghana Navy advised the canoe owners and their crew to continue their cooperation and desist from any activities that could result in disruption between the two industries.



*A group photo of canoe owners and crew from Jomoro with Tullow's engagement team.*

### **Engagement with Traditional Authorities and Local Government**

During the last quarter of 2022, the Social Performance (SP) Team paid courtesy calls on all the Local Government Authorities across the seven (7) coastal districts of the Western Region. As an outcome to these engagements, the leadership of the eleven (11) Traditional Councils and the seven (7) Municipal and District Chief Executives pledged their support towards peaceful co-existence amongst the fisherfolks and with regards to the offshore activities.

The occasion offered opportunities for the Social Performance Team to provide updates on community development initiatives as well as clarify lingering issues and misconceptions surrounding Jubilee and TEN operations, particularly, allegations on Navy-fisherfolks interactions and the need for an improved relationship.



*SP Team engaging Metropolitan, Municipal and District Assemblies on matters relating to Voluntary Principles*

### **Civil Society**

Four (4) different meetings were held with active Youth Groups, NGOs, and SMEs in the Western Region. These meetings focused on the role and opportunities for NGOs and SMEs in the supply chain of the oil and gas industry. It also provided

opportunity for Social Performance team to update these stakeholders on the socioeconomic and shared prosperity contributions as well impact mitigation initiatives being implemented by Tullow and its partners.

The presentation also highlighted effort and commitments by Tullow and its partners towards Voluntary Principles. The role of each stakeholder group towards effective enforcement of the principles were extensively discussed. Some of the youth groups engaged are listed below:

- Axim Youth Association
- Friends of the Nation and its members
- Shama Youth Association.



*Tullow team with Axim Youth Association Executives*

## Communities

The Public Consultation and Disclosure Plan (PCDP) remains a valid document and provides guidelines for addressing community, organisational or individual grievances that relates to the Jubilee and TEN operations. In 2022, the Social Performance Team maintained a consistent interaction with all key stakeholders on the processes for registering, investigating, and addressing upheavals. Interestingly, there were no issues that required any form of payment or replacement of fishing canoe or accessories. All cases reported on gear confiscations within the Advisory or Exclusive Zones were resolved in a timely way by the grievance committee. The committee which involved the leadership of the Ghana National Canoe Fishermen Council and Fisheries Commission, ensured that the gears were retrieved by their respective owners.



*SP Team engaging Canoe Owners at New-Takoradi on Voluntary Principles Security and Human Right (VPSHR)*

## 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, Northwest Kenya).

Activities in the field during 2022 were limited and centered on care and 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 combination of National Police Service officers drawn from the Kenya Police Service, Administration Police Service (Critical Infrastructure Police Unit CIPU – Oil and Gas) 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 VPs 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 quarterly refresher trainings public (armed) security providers were not held in 2021 or 2022 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 and Tullow will plan to conduct refresher training as the project works commence.

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 organizations. 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 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.