

TULLOW

April 2025

The Voluntary Principles on Security and Human Rights

Tullow Oil plc
2024 Summary Report

THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS
(“VPSHR”, “Voluntary Principles” or “VPs”)
Tullow Oil plc
2024 Summary Report

Introduction

Since 2010, Tullow has actively implemented the Voluntary Principles (VPs) on Security and Human Rights, becoming an official participant in March 2013 and serving on the Steering Committee from March 2019 to March 2020.

In Ghana, we collaborate with the Ghana Navy to ensure the protection of our offshore assets and have applied the VPs framework to engage with local fishing communities, resulting in the development of a safe sea access protocol. Our safety and security operations are supported by multi-role support vessels, including a dedicated Ghana Navy ship.

In Kenya, we work closely with the Kenyan Police Service and the Critical Infrastructure Protection Unit (CIPU) to manage site security. We maintain ongoing dialogue with local communities to build trust, address concerns, and foster cooperation. In addition, we engage private security providers through partnerships with local firms, incorporating the VPs and the International Code of Conduct Association’s standards into our contractual obligations.

The adoption of the VPs aligns with Tullow’s Code of Ethical Conduct and our Human Rights Policy commitments. In 2023, we conducted a human rights saliency assessment, identifying security risks such as conflict and potential misuse of force as key priorities. We have developed action plans to monitor progress, including the continued implementation of the VPs. This approach not only enhances operational security and resilience but also reinforces our commitment to building respectful, trust-based relationships with host communities.

Country Implementation

West Africa - Ghana

Operational Overview

Tullow produces oil and gas from two operated deep-water developments offshore Ghana: Jubilee and TEN fields. The Jubilee Field, located approximately 60 km off the Western Coast of Ghana, commenced production in December 2010. The Tweneboa, Enyenra, and Ntomme (TEN) Fields, situated about 20 km west of Jubilee, began production in August 2016. In 2022/2023, Tullow successfully completed the Jubilee South-East expansion project.

To support these offshore operations, Tullow deploys multi-role support vessels to carry out safety and security functions. The fleet includes two Anchor Handling vessels, Flat Confidence and Vega Power as well as a Ghana Navy Ship, which is staffed with Naval personnel and a Tullow representative to ensure compliance with applicable laws and internal policies.

Effective execution of offshore activities requires the full cooperation of local fishing communities, particularly in observing the Exclusive and Advisory Zones established around the Jubilee and TEN fields. To this end, the Social Performance and Asset Protection Teams have implemented the Voluntary Principles on Security and Human Rights through the following measures:

Human Rights (VPSHR) Training

Tullow continues to utilize the services of the Ghana Navy and Marine Police for offshore security, whilst G4S is responsible for onshore security. Over one hundred Public and Private Security Officers have been trained in Voluntary Principles (VPs). We continued to provide regular induction and training for private security guards, public security guards, and fishing liaison officers. In 2024, training in Voluntary Principles on Security and Human Rights (VPSHR) was provided for 384 security personnel from the Marine Police and Navy.

Stakeholders have developed operational working instructions incorporating the VPs to ensure compliance. The security service providers have also conducted various risk assessments, such as the arrest of repeated Exclusion Zone offenders.

Tullow has thoroughly examined the human rights records of officers nominated for its operations. Furthermore, monthly inductions and performance reviews are conducted for Security Service Providers to ensure adherence to the VPs. Tullow’s risk register and salient issue action plan is regularly reviewed and maintained.

During the campaign period ahead of 2024 elections, several fishermen violated the exclusion zone regulations. However, the Public Security Officers acted professionally in accordance with the VPs, avoiding any human rights violations. Instead of resorting to force, the Public Security Officers (Navy and Marine Police) collaborated with the Tullow Social Performance/Asset Protection Team, Ghana Maritime Authority, and Fisheries Commission to engage with the fishing communities regarding the prohibition of fishing within the exclusion zone.



Ghana Marine Police undergoing VP training (left); Training for G4S security staff on VP (right).

Marine Police Collaboration

Between March and August 2024, Tullow Ghana Limited engaged with the Western Regional Director and senior officers of the Ghana Marine Police to strengthen offshore security and community safety. Discussions addressed unauthorized fishing incursions, enhanced joint patrols with the Ghana Navy and legal enforcement strategies. The Marine Police committed to integrating officers into offshore patrols while balancing enforcement with community engagement, reinforcing Tullow's dedication to maritime safety and regulatory compliance.

We also commenced discussions with the Marine police in 2024 which led to the signing of an MOU in 2025 outlining mutual responsibilities under the Voluntary Principles. Detailed implementation working instructions have also been prepared. In partnership with the Marine Police. This new MOU complements that MOU that we have in place with the Ghana Navy.

Prior to the inclusion of the Marine police in offshore patrols, Tullow launched targeted radio broadcasts in local languages across seven coastal districts. These sessions raised awareness on the Safe Sea Access Framework, encouraged use of grievance mechanisms, and aimed to reduce canoe incursions. Featuring live discussions and Q&A segments, the campaign was well-received by fisherfolk, improving safety awareness, and strengthening trust with coastal communities.

Stakeholder Engagement Summary

Community engagement

Tullow Ghana engaged 115 communities across the Jubilee and TEN areas in 2024, aligning with the Public Disclosure Consultation Plan, Ghana Petroleum Commission guidelines, and IFC standards. Key stakeholders—including fisherfolk, traditional leaders, local authorities, and students—were engaged on offshore security, safe fishing, operational boundaries, grievance mechanisms, and oil and gas risk awareness. Engagement methods included community outreach, radio campaigns, forums, and educational sessions, reinforcing Tullow's commitment to the Voluntary Principles on Security and Human Rights.

Multi-Stakeholder Engagement

A two-day residential forum was hosted at Busua Beach Resort, bringing together the Ghana National Canoe Council, coastal fisherfolk, and regulatory bodies such as the Environmental Protection Agency, Ghana Navy, Fisheries Commission, and Marine Police. Discussions focused on sustainable fishing, maritime safety, and collaborative approaches to operational and environmental challenges. The event featured interactive workshops and feedback sessions, enhancing partnerships and compliance awareness.

The engagement enhanced stakeholder relationships, increased compliance awareness, and provided valuable input for programme improvement, ultimately empowering coastal communities.



Multi-Stakeholder Engagement at Busia Beach Resort

Direct Fishing Community Engagement

Over a four-week period in Q2 2024, Tullow engaged 35 key fishing communities across the Western Region. Topics included operational risks, grievance mechanisms, and impact mitigation. A renovated community shed was commissioned in Brewire—one of 26 facilities supporting ongoing dialogue and community development.



Direct Fishing Community Engagement

Engagement with MMDAs and Traditional Authorities

Tullow conducted strategic engagements with MMDAs across seven coastal districts to strengthen partnerships and promote sustainable development. Topics included maritime regulation enforcement, socio-economic initiatives, and political neutrality. These sessions yielded actionable insights and reinforced collaborative governance.

Tullow also deepened its engagement with traditional leaders to promote ownership of social initiatives and ensure community stability. Chiefs were engaged on their role in supporting development projects, mitigating political tensions, and addressing offshore operational challenges. These efforts improved trust and grievance resolution.



Engagement with Metropolitan, and District Assemblies (MMDAs)

Seismic Survey Preparedness

Ahead of the 2025 4D seismic survey, Tullow conducted a comprehensive stakeholder engagement campaign across seven coastal districts. The initiative focused on raising awareness, outlining safety protocols, and encouraging collaboration among fisherfolk, traditional authorities, local government, and regulators.



Engagement ahead of Seismic Survey Campaign

Post-Closed Fishing Season Engagement

Following the closed fishing season, Tullow, in collaboration with the Ghana Navy and Asset Protection Team, engaged over 15 major fishing communities. Discussions covered maritime regulations, human rights, and the Safe Sea Access Framework. Impact mitigation projects such as Fisherman's Anchor and Scholar's Aid were highlighted. Tullow also reached 22,500 students across 13 senior high schools and two tertiary institutions, promoting offshore safety and sustainable practices.

Grievance Mechanism and Reporting

We also reviewed community grievance mechanisms in Ghana against the United Nations Guiding Principles (UNGPs) effectiveness criteria. One of the outcomes of the review was the development of an online tool to improve the recording of grievances and capture community feedback to drive speedier resolution of grievances.

There were three fishing community grievances related to the loss of fishing gear and a delay in replacement of fishing gear. Focus continues on publicising the grievance mechanism with key stakeholders in our communities and also ensuring grievances related to security forces are also captured in our grievance mechanisms.

East Africa – Kenya

Operational Overview

In 2024, Tullow Kenya maintained its strategic position in the South Lokichar Basin, focusing on sustaining field readiness and progressing its Field Development Plan while seeking a strategic partner.

Operational activities include routine maintenance of field infrastructure, vegetation clearance, generator servicing, and water trucking to communities. In 2024, Tullow conducted well integrity assessments, statutory environmental audits, and emergency response drills. Security operations addressed incidents of theft and vandalism, while stakeholder engagement continued through meetings with local leaders and community groups.

Tullow supported local employment, renewed service contracts, and responded to grievances, including those related to delayed payments and site access.

In January 2025, Tullow finalized environmental audits and received National Environment Management Authority approval for key infrastructure.

In April 2025, Tullow announced its intention to exit Kenya by selling its assets for \$120 million, marking a strategic shift away from upstream operations in the country.

Despite limited operational activity, Tullow the Social Performance and Asset Protection Teams have implemented the Voluntary Principles on Security and Human Rights through the following measures:

Human Rights (VPSHR) Training

In 2024, we held training on the importance of adhering to the Voluntary Principles on Security and Human Rights (VPSHR) for 36 security personnel from the Critical Infrastructure Protection Unit of the National Police service and other security services.

In April 2025, both public and private security personnel were trained on how to handle community work interruptions, roadblocks, and demonstrations. A total of forty (40) security personnel attended the training. The focus was centred around the impacts of human rights violations that can affect Tullow, especially regarding the use of lethal force and unlawful detentions.

1. **Legal** – Legal corporate responsibility to maintain security while ensuring respect for human rights.
2. **Reputational** – Ensure there is no decline in the Company's business reputation because it can affect shareholder confidence.
3. **Economic** – Prevent the company from incurring cost of compensation due to Human Right abuses.
4. **Security** – Loss of confidence by the local community regarding security providers could lead to lack of support for the project.

National Police Service MOU

The Inspector General of Police has been informed that Tullow will reduce the number of National Police attached to the project by about 50% due to reduced activities in the South Lokichar Basin, Turkana. During 2024 we continued to engage with the relevant stakeholders on the renewal of the MOU.

Grievance Mechanism and Reporting.

Through both Social Performance and Security teams, we continue to record any emerging communities and complaints from our service providers.

Some examples of grievances previously handled include the following.

1. Non-payment of terminal dues by a former man guarding company providing security for the field sites. The former service provider was contacted by Tullow, and payment done thus closing the grievance.
2. Community issues regarding employment opportunities. The locals demanded jobs that led to the closure of Twiga 1 for three months. The matter was resolved, and the site was reopened following agreement to employ eight site marshals.



Private guards, VPSHR training in Turkana 04 April 2025 (left); National Police Service personnel during the VPSHR training at the Police Camp (CIPU) Turkana (right).

END.