



# Tullow Oil: Modern Slavery Act Transparency Statement

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Tullow Oil plc.<sup>1</sup>

## Introduction

Tullow<sup>2</sup> is committed to respecting internationally recognised human rights, including fundamental labour rights and international labour standards as set out in the Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work<sup>3</sup>. We recognise that the nature and context of our business – which is often based in remote areas in developing countries – exposes our organisation and supply chain to the potential risk of instances of modern slavery and human trafficking, including underage, forced or bonded labour. We work to continually assess the extent of this risk and to take steps to ensure that modern slavery has no place in Tullow's business or supply chain.

## About Tullow

Tullow Oil plc is a leading independent oil & gas exploration and production company, headquartered in London and listed on the London, Irish and Ghanaian stock exchanges. Our portfolio of more than 85 exploration and production licences spans 17 countries<sup>4</sup> and is organised into three Business Delivery Teams – West Africa, East Africa and New Ventures. We create value for our business by finding, selectively developing, producing and selling oil. Our business model describes how the different parts of the Group work together to run our business and create value, and can be found on our [website](#), along with details of our workforce.

## Our Supply Chain

The potential risk of modern slavery affecting a company's supply chain is influenced by the level of activity being carried out in each country. For Tullow, this activity ranges from pursuing exploration activities through to undertaking onshore and offshore development projects and production operations.

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, IT, communications and other services. We continue to focus on creating improved access to supply chain opportunities for local

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<sup>1</sup> This statement covers Tullow's 2018 financial year, which ended on 31<sup>st</sup> December 2018.

<sup>2</sup> Tullow Oil plc is the parent company of the Tullow Group of companies. In this statement, "Tullow", "we", "us", "our" and "the Company" are sometimes used to refer to Tullow Oil plc and its subsidiaries. See [Tullow Annual Report 2018](#) pg.171-173.

<sup>3</sup> Tullow Human Rights Policy, May 2017

<sup>4</sup> Ghana, Gabon, Côte d'Ivoire, Equatorial Guinea, Mauritania, Kenya, Uganda, Comoros, Zambia, Namibia, UK, Pakistan, Peru, Jamaica, Suriname, Guyana, Uruguay.



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.

## Governance, Policy and Standards

Tullow Oil plc 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**, which applies to Tullow's directors, employees and contract, agency or temporary workers (hereafter Tullow staff), prohibits the use of underage, forced or bonded labour and sets out our expectations on respect for fundamental labour rights and freedom from harassment. The Code also sets out our commitment to conducting 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 the Code and their performance is subject to ad-hoc audit.
- 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 **Contracts & Procurement Standard** sets out minimum requirements for the placement of contracts for goods, works and services, and our Group Supplier Due Diligence procedure sets out due diligence requirements in respect of human rights and labour conditions. In 2018, Tullow updated its standard form procurement contract templates to include specific references to compliance with applicable anti-slavery and human trafficking laws.

## Due Diligence and Assurance

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 & Human Rights.

We have a supplier audit programme in place to address risks related to business ethics and compliance, including human rights and labour conditions. The results of such audits may, if needed, generate a requirement that suppliers improve their human rights and modern slavery controls.

Our **Speaking-Up** mechanism is designed to provide Tullow staff and anyone performing services for Tullow with a safe and secure method of reporting matters related to their working environment,



including where they believe our Code of Ethical Conduct has been breached. This includes an independent and confidential mechanism for reporting. We also have a grievance procedure designed to resolve instances where our staff feel they have been disadvantaged or treated unfairly in relation to their terms and conditions, health and safety, working environment, bullying and harassment.

## **Training**

In 2018, we reviewed our Code of Ethical Conduct, enhancing the human rights section further with an explicit reference to modern slavery and human trafficking. All Tullow staff are required to complete the Company's Code of Ethical Conduct e-learning course, which was developed to ensure greater awareness of the Code's requirements and support application of the Code in our day-to-day activities. In 2018, all Tullow staff completed this internal course, which included a new section on identifying instances of modern slavery. We also completed our annual certification process, obtaining disclosure from all Tullow staff about their level of compliance with the Code and its accompanying standards, procedures and guidelines.

During 2018, Tullow again carried out due diligence training across our Supply Chain function to reinforce awareness of the processes in place to prevent modern slavery in our supply chain.

## **Next steps**

In 2019, we will continue to emphasise to our suppliers our commitment to ensuring that modern slavery and human trafficking is not part of our supply chain.

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

**Signed for and on behalf of the Board of Tullow Oil plc.**

A handwritten signature in black ink, appearing to read "P. McDade".

**Paul McDade**

Chief Executive Officer

31 March 2019