

THE VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS
(“VPSHR”, “Voluntary Principles” or “VPs”)
Tullow Oil plc
2023 Summary Report

INTRODUCTION

Tullow has implemented the Voluntary Principles (VPs) 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 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 VPs enables Tullow to meet the requirements of our Code of Ethical Conduct and commitments set out in our Human Rights Policy. In 2023, we conducted a human rights saliency assessment where security and conflict or misuse of force has been prioritised as a salient issue and supporting action plans have been developed to help us track our progress, including implementation of the VPs. Implementing the VPs 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 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. In 2022/2023 Tullow completed the Jubilee South-East expansion project.

As part of the operational support for these offshore activities, Tullow 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 complement of Naval personnel and a Tullow representative to monitor compliance with relevant laws and policy.

The offshore 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 on Security and Human Rights by the Social Performance and the Asset Protection Teams were done as follows:

Public Security

Tullow’s offshore security service provider, the Ghana Navy, maintained a cordial working relationship with stakeholders in line with the VPs.

Tullow organized 24 pre-deployment inductions for the crew onboard the Ghana Navy security vessels. The inductions focused on the VPs, Ghana Armed Forces rules of engagement, UN Principles on the Use of Force and Firearms by Law Enforcement Officials, and the UN Code of Conduct for Law Enforcement Officials.

The Ghana Navy personnel had daily interactions with fishermen in the field. There were no reported incidents of human right abuses from the fishermen and other stakeholders.

Tullow in collaboration with the Ghana Navy, Marine Police, and other stakeholders, engaged the fishing communities on the fishing restrictions in the 500m - Exclusion Zones around the Jubilee and TEN assets. The Ghana Navy High Command was engaged by Tullow Asset Protection Team on a quarterly basis to review the Navy's offshore operations and compliance with VPs.

Private Security

Tullow's onshore security service provider, G4S Security also operated according to the VPs.

G4S Security guards were provided refresher training in VPs and international humanitarian law. There were no reported breaches of the VPs by G4S Security guards.

Overall, there was no security or human rights breach by Tullow's security service providers. The Ghana Navy and G4S Security Service continues to comply with the VPs.

Engagement with Traditional Authorities

The ten traditional councils spanning seven coastal districts participated in a week-long residential engagement session at Busua Beach Resort. This session marked a revival of our regular engagement activities that were temporarily suspended due to the onset of COVID. The councils were by council presidents, queen mothers, chiefs (divisional and sub-divisional), and Registrars to the Paramount Chiefs.

During the sessions, we included updates to the councils on various aspects of business operations, including offshore safety and security, grievance redress mechanisms, voluntary principles on human rights, sea access and incursion management. We actively sought input from the traditional councils on how to sustainably address risks related to incursions by fishermen into the exclusion zones.



Engagement with traditional authorities on matters relating to Voluntary Principles

Engagement with Local Government

Similar engagements were held with the respective Assemblies across the seven coastal districts. This strategic initiative aimed to extend our outreach to a broader audience, including Assembly Members who are the political (government) representatives of the communities, but might not have had the opportunity to attend our regular meetings.

During these assembly meetings, alongside business and operations updates we provided update on offshore security and safety, Voluntary Principles and human rights, grievance management, as well as socio-economic and impact mitigation initiatives were delivered. This approach facilitated open discussions, allowing assembly members to seek clarification on any concerns and address misconceptions in the public domain. The feedback received during these engagements played a vital role in shaping our project management framework and strategies.

This commitment to active participation in district assemblies reflects our dedication to fostering transparent communication, addressing concerns, and incorporating community feedback into our operational planning and execution.



A session with the Shama District Assembly at their 2023 Annual Meeting.

Engagements with Local Communities

We conducted extensive engagement with fishing crews, canoe owners, and stakeholders throughout the fishing value chain. These meetings featured operations updates, security measures, sea access, incursion statistics, grievance resolution processes, and information on socioeconomic and mitigating projects. These engagements were held in major fishing communities across the seven (7) coastal districts, with over 8,000 locals actively participating. Fisherfolks raised complaints and sought remedies for the issues they raised.

Key Takeaways from the Engagement are,

- Fisherfolks were reminded of the need to promptly report any security-related issues for investigation, to the appropriate authorities.
- Identification of Naval Vessels: Participants were taught how to recognize naval vessels associated with both our (JV Partners' operations) and that of ENI Ghana.

These engagements demonstrate our commitment to open communication, active cooperation, and meeting the requirements of our stakeholders while adhering to sustainable practices.



Community engagement session at Axim Cluster of communities (Lower Axim, Apewosika, Upper Axim)

Jubilee South-East Engagements

Following the Operations Team's success in acquiring permits for exploration in the Greater Jubilee Field, specifically southeast of the field, the Social Performance team undertook a comprehensive engagement effort in March and April 2023. and to provide operational updates, including timelines, vessels, safety measures, and security updates (in line with the Voluntary Principles Security and Human Rights), as well as to raise awareness about grievance redress mechanisms. The aim was to seek cooperation and minimize incursions into both the Exclusive Zone (EZ) and Advisory Zone (AZ).

This involved the participation of over seven hundred (700) fisherfolks from key fishing communities across the seven (7) coastal districts. Key stakeholders such as the Marine Police, Fisheries Commission, Ghana Navy, and Ghana National Canoe Fishermen Council were actively involved. These planned engagements were designed to achieve specific objectives and were incorporated into our annual scope of engagements.

East Africa – Kenya

Tullow 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 2023 were limited and

centered on care and maintenance and protection of field assets. Tullow's approach to security has always been cognisant of the importance of adhering to Human Rights. We are guided by policies, standards and procedures that sets the expectations of both public and private security personnel.

Voluntary Principles of Security and Human Rights (VPs) Training.

In line with the VPs requirements, we conducted a refresher training in the month of April 2024 for the National Police and Manned Guards located at our Well Pads and field sites in Turkana, Lokichar Basin.

The focus of the training was centred on the use of force during engagement with local host communities, as well as adhering to the UN Code of Conduct for Law Enforcement Officials (1979), the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990) and the Universal Declaration of Human Rights. In addition, the training also emphasised on the importance of adhering to the UK Anti Bribery and Corruption (ABC) Policy.

A total of thirty-six (36) security personnel attended the training.

National Police Service MOU

The Memorandum Of Understanding (MOU) establishes the continued cooperation between Tullow and the National Police Service (NPS) to ensure the safety and security of company staff, assets, and local communities.

The MOU with NPS is designed to create a framework to provide direct security and policing

support to the project while also agreeing commitments about community policing and safety.

The 2024 MOU renewal document has been prepared by Tullow and is under review by the Inspector General Police.

Grievance Mechanism and Reporting.

There have been several occasions where community disquiet linked to access to employment and business opportunities has led to disrupted work. The National Police intervened to normalize operations and reduce the risk to project personnel and assets.

These high-tension events have the potential for the National Police to be heavy handed when restoring law and order.

To mitigate this, we train NPS on de-escalation techniques and implemented the grievance mechanism system where the community can lodge any human rights related allegations or violations committed by both public and private security personnel for investigation and further action.



Guards during VPSHR training in Turkana. 14th April 2024.