



Tullow Oil plc  
2022 Sustainability  
Report

# Accelerating progress through partnerships



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# Building a better future through responsible oil and gas development



**Safe operations**



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**Shared Prosperity**



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**Environmental stewardship**



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**Equality and transparency**



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# About this report

**Thank you for your interest in this 2022 Sustainability Report of Tullow Oil plc (Tullow). This report is published alongside our 2022 Climate Risk and Resilience Report and our 2022 Annual Report and Accounts and complements our business and financial information to provide stakeholders with a complete picture of our economic performance, our social and environmental impacts in 2022 and a view of our strategy going forward.**

This report was prepared in accordance with the Global Reporting Initiative (GRI) Standards 2021 including GRI 11: Oil and Gas Sector 2021.

GRI Reporting Principles were applied in this report as defined in GRI 1: Foundation 2021. The principles are:

- **Accuracy:** We provide information that has been internally or externally verified and is sufficiently detailed to allow an assessment of Tullow's impacts.
- **Balance:** We have aimed to provide a fair representation of Tullow's positive and negative impacts, including key challenges.
- **Clarity:** We report in a way that is accessible, using plain and clear language.
- **Comparability:** We disclose information that is consistent with prior reporting to enable an analysis of changes in Tullow's impacts over time.
- **Completeness:** We provide information across all our activities to enable an assessment of the Tullow's impacts during the reporting period.
- **Sustainability context:** We report our impacts in the wider context of sustainable development with reference to global priorities and trends.

- **Timeliness:** We report information on a regular schedule alongside our Annual Report, so that is available in time for information users to make decisions.

- **Verifiability:** We provide details of our basis of reporting so that the information can be examined to establish its quality.

The content of this report was also informed by the International Petroleum Industry Environmental Conservation Association (IPIECA) Oil and Gas Industry Guidance on Voluntary Sustainability Reporting and the Sustainability Accounting Standards Board (SASB) Oil & Gas Sector Exploration and Production Standard (EM-EP). Tullow's key findings in response to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) are presented in our Climate Risk & Resilience Appendix and summarised in our 2022 Annual Report and Accounts.

Quantitative data in this report relate to the 2022 calendar year and cover our global operations unless otherwise stated. Specifically, the scope of our greenhouse gas (GHG) reporting includes all of Tullow's countries of operation and non-operated production (see Tullow Oil's GHG Emissions Scope & Calculation Methodology). Descriptions of data collection methodologies and notes to reported metrics are available in our Basis for Reporting document. GHG emissions data from our operated assets have been externally assured by Integrated Reporting and Assurance Services (IRAS) and the Assurance Statement can be found on our website at [www.tullowoil.com/sustainability](http://www.tullowoil.com/sustainability).

We welcome your queries and feedback and invite you to contact us at: [sustainability@tullowoil.com](mailto:sustainability@tullowoil.com)



# About Tullow Oil

Tullow's purpose is to build a better future through responsible oil and gas development.

Through our activities, we help to address global energy demand in a safe, cost-efficient and environmentally and socially responsible manner. We form close relationships and partnerships in our host countries in Africa and South America to advance shared prosperity. We generate considerable economic and social value, advancing national development priorities, creating local business and investment opportunities, and helping to build local skills and capabilities.

As an independent oil & gas exploration and production company with interests in over 30 exploration and production licences across 8 countries in Africa and South America, we contribute to the economic development of emerging, oil-exporting economies. In Ghana, we operate the Jubilee and TEN fields which produced, on average, in excess of 31,000 bopd, net to Tullow. The Jubilee and TEN fields in Ghana provide Tullow with a number of investment opportunities through a combination of infill drilling, facilities expansion, and new production from currently undeveloped areas of the fields and near field exploration. Tullow's non-operated production in Gabon and Côte d'Ivoire also provide infrastructure-led exploration (ILX) opportunities and a number of diverse low-risk investment projects. Tullow's refreshed field development plan for our discovered resources in Kenya demonstrates further options to unlock additional value from our development assets. For more details about Tullow's current operations, see Our Operations on our website.

Tullow is headquartered in London and our shares are listed on the London and Ghana Stock Exchanges. In 2022, we generated \$1.7831 billions in sales revenue, and paid \$468 million in taxes to host country governments. We employ approximately 380 people, of whom 77% are local nationals in our host countries.

## Key:

- Exploration
- Development
- Production
- Decommissioning

■ Tullow Oil was founded in 1985 in a small town called Tullow, near Dublin in Ireland, with an initial focus on delivering social and economic value in Senegal by operating abandoned gas fields. ■

## Africa



Note: countries are not to scale



Gabon



Kenya



Guyana



Ghana



Côte d'Ivoire



Mauritania



Argentina





# Message from our CEO



“As we continue to further adapt our business to current challenges and operational circumstances, our approach to sustainability is fundamental to our future success.”

**Rahul Dhir**  
Chief Executive Officer

As an independent oil and gas operator, working almost exclusively in developing economies, we have an important role to play in supporting a global energy transition in ways that benefit our host nations. Our approach at Tullow has always been to support the national socioeconomic objectives of our host countries through our engagement with governments, local business partners and communities, and our Shared Prosperity strategy which creates economic opportunity for the people who need it most. Partnering with our host nations to develop Africa's energy resources in a low-cost, environmentally and socially responsible manner adds a critical boost to local economies, improves the quality of life and creates a better future for current and future generations.

With much of the discussion at the recent UN Climate Change Conference COP27 centring on loss and damage and supporting developing economies that are particularly vulnerable to the adverse effects of climate change, a

corner has been turned in the level of global awareness and commitment to managing climate mitigation efforts in a responsible and equitable manner. While we believe that there will continue to be a demand for hydrocarbons into the foreseeable future, we remain laser focused on mitigating the climate impacts of our operations while generating significant social and economic benefit for our host nations.

Our pathway to achieving Net Zero for our Scope 1 & 2 greenhouse gas emissions by 2030 is well under way. The elimination of routine flaring at our Jubilee and TEN FPSOs by 2025, a key milestone in delivering our Net Zero Commitment, remains on-track. For emissions which are hard to abate, we continue to investigate nature-based solutions, working in partnership with the Ghana Forestry Commission as we progress the outcomes of a Feasibility Study, completed in 2022, to a planned Final Investment Decision in late 2023. We continue to seek additional

efficiencies throughout our value chain and our internal Green Teams are delivering new ways of working to save energy, water and reduce waste.

Alongside carbon and climate, our Shared Prosperity strategy continued to deliver exciting results. In 2022, we supported STEM education in Ghana, Kenya and Guyana through a range of programmes from primary to tertiary education with local nonprofit partners, supported school infrastructure and created new entrepreneurship opportunities. Thousands of beneficiaries of our programmes are leveraging new knowledge and skills as productive members of their communities. The Fisherman's Anchor Project has impacted more than 2,500 people in Western Ghana's coastal fishing communities, improving livelihoods. Our local content objectives of nurturing the supply base in our host countries also progressed remarkably well in 2022 with several new initiatives to enhance transparency, raise awareness of business

opportunities and provide practical assistance for hundreds of small businesses. 89% of Tullow Ghana's total procurement spend in 2022 was with indigenous and joint venture companies. Equally, we aim to advance local nationals in our own business through our localisation focus and 75% of our Ghana workforce are Ghanaian.

Internally, we are a compact, focussed and agile team with a positive, values-based culture. Overall, across all the questions in our Employee Engagement Survey in 2022, employees scored their satisfaction and engagement at 70 percent, an increase from last year's average of 63 percent, demonstrating a positive trend, while also indicating there are several areas for improvement, which we are addressing.

Finally, we look forward to 2023 as a year of further progress and achievement. If 2022 was a year of consolidation – recovery from the effects of the COVID-19 pandemic, regrouping after the termination of our anticipated merger with Capricorn Energy and building our capability as we transitioned operatorship of our Jubilee FPSO from our supplier MODEC to our in-house team – the coming year will focus on reinforcing growth, intensifying efficiencies, amplifying climate action, deepening partnerships and progressing Shared Prosperity outcomes that contribute to sustainable development in our host countries.

I invite you to share my optimism and thank you for your interest in this report.

**Rahul Dhir**  
Chief Executive Officer



# 2022 sustainability highlights



## Safe operations



- Zero lost time / recordable injuries across our global operations
- Zero Tier 1 process safety Loss of Primary Containments. One Tier 2 process safety Loss of Primary Containment
- Process Safety Fundamentals programme completed
- Colleagues attended an average of 7.1 wellness events throughout the year in our Global Wellness Agenda



## Shared Prosperity



- \$173 million local supplier spend in 2022, bringing total five-year local spend to \$1.2 billion
- Continued investment in the Ghana fishing communities with a total of loans worth over \$300,000 granted to 1,300+ fishing businesses to date
- 3,000 pupils benefited from senior high school boarding accommodation and classrooms funded by Tullow in Ghana
- 6,000+ secondary and tertiary students benefited from Tullow STEM scholarships, bursaries and after school support
- Launched a ground-breaking, proprietary Local Content Reporting Tool to show how Tullow suppliers are meeting commitments in Ghana
- Three local content Awards for Tullow Ghana



## Environmental stewardship



- Significant progress in advancing plans to eliminate routine flaring to meet our Net Zero commitment
- New agreement with the Forestry Commission of Ghana to progress nature-based solutions to support our Net Zero commitment
- 74% of generated waste, recycled or reused



## Equality and transparency



- \$645 million total socio-economic contribution in our host countries, bringing total five-year socio-economic contribution to \$3.1 billion
- \$468 million paid to host countries in taxes
- Localisation in Ghana at 75% by end of 2023, with target to achieve 90% in the next 3-5 years
- Salary adjustments in Ghana to protect local employees against currency depreciation



# Our sustainability framework

Tullow takes a strategic approach to embedding sustainability throughout our business. This approach is based on our understanding of the needs and demands of our stakeholders, combined with a focus on the topics that reflect our most significant economic, social and environmental impacts.

Our sustainability framework includes 15 sustainability material topics which are clustered in four pillars. Each pillar and its related topics also directly contribute to the advancement of 7 United Nations Sustainable Development Goals (SDGs).

Our material topics were defined in 2019 after consideration of feedback from our stakeholders, our business strategy and leading sustainability reporting standards and frameworks, including sustainability reporting guidance of IPIECA, GRI Standards and the SASB Oil & Gas Sector Exploration and Production Standard. We also considered sustainability trends impacting our industry and global priorities reflected in the SDGs. During 2022, our Senior Leadership Team (SLT) confirmed these sustainability material topics remain relevant and continue to reflect our most important impacts on the economy, people and the environment.

In 2023, we intend to undertake a new materiality assessment to align our sustainability focus with our updated business strategy and impacts in today's business environment.

Safe operations	Shared Prosperity	Environmental stewardship	Equality and transparency
<ul style="list-style-type: none"><li>- Employee health and safety</li><li>- Process safety</li><li>- Emergency response</li></ul> <p><b>3 GOOD HEALTH AND WELL-BEING</b>  <b>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</b> </p> <p><b>p.11</b></p>	<ul style="list-style-type: none"><li>- Local content and capacity</li><li>- Community development</li><li>- Social investment</li></ul> <p><b>4 QUALITY EDUCATION</b>  <b>8 DECENT WORK AND ECONOMIC GROWTH</b> </p> <p><b>p.15</b></p>	<ul style="list-style-type: none"><li>- Climate change</li><li>- Biodiversity</li><li>- Spills</li><li>- Waste</li></ul> <p><b>7 AFFORDABLE AND CLEAN ENERGY</b>  <b>13 CLIMATE ACTION</b> </p> <p><b>p.29</b></p>	<ul style="list-style-type: none"><li>- Compliance</li><li>- Anti-corruption</li><li>- Human rights</li><li>- Inclusion and diversity</li><li>- Tax transparency</li></ul> <p><b>10 REDUCED INEQUALITIES</b> </p> <p><b>p.37</b></p>

Tullow supports the following standards and partnerships:



International  
Association  
of Oil & Gas  
Producers





# Advancing the SDGs

Tullow aims to align with the world's sustainable development priorities to deliver global prosperity by 2030 as encompassed in the United Nations Sustainable Development Goals. By working to deliver our purpose, Tullow is best placed to make a significant contribution towards 7 SDGs.

## Safe operations



Tullow provides a safe working environment for colleagues, contractors and visitors.

Occupational health and safety: page 12

We are committed to maintaining and enhancing our process safety and emergency response management.

Global Wellness Agenda: page 14

Tullow promotes health and wellness for Tullow colleagues around the world.

Global Wellness Agenda: page 14



## Shared Prosperity



We contribute to economic growth in our host nations through responsible business practices, promoting human rights, optimising local content and employing African nationals throughout our business, enhancing inclusive employability and livelihoods and helping reduce income inequalities.

Shared Prosperity: page 15

Tullow makes a significant contribution to advancing education, in particular STEM education, in our host countries.

Education and skills development: page 18



## Environmental stewardship



We advance responsible and efficient energy production in our host countries.

Environmental stewardship: page 29

Tullow has committed to Net Zero for Scope 1 and 2 GHG net equity emissions, by improving operational efficiencies, eliminating routine flaring and identifying nature-based solutions for hard to abate emissions.

Progressing our Net Zero roadmap: page 30

We manage water and waste responsibly and report transparently to our stakeholders.

Minimising our environmental impact: page 34

We minimise negative impacts on biodiversity during all phases of our activities.

Protecting biodiversity: page 36



## Equality and transparency



We engage thoughtfully and consistently with a broad range of stakeholders.

Engaging our stakeholders: page 17

We place an uncompromising focus on ethics and compliance.

Governance, compliance and ethics: page 38

We take a responsible approach to taxation and support transparency in our payments to governments.

Taxation: page 42

We work to improve the diversity of our workforce and the inclusiveness of our culture.

Our people: page 43





# Engaging with stakeholders

During 2022, we continued to engage meaningfully with our primary stakeholders to ensure we are aware of their expectations and concerns and are able to address them effectively. The main ways we engaged in 2022 are as follows:

Stakeholder	Primary means of engagement	Key expectations	Engagement in 2022
Host communities	Regular interactions in our host countries through our local Social Performance teams.	<ul style="list-style-type: none"><li>- Project development and operational updates.</li><li>- Managing project related concerns.</li><li>- Updates on socio-economic investments and local content opportunities.</li></ul>	We engaged across the spectrum of local communities in Ghana and Kenya. In Ghana, a focus of discussion was offshore platform security arrangements, while in Kenya, the focus was on land acquisition relating to our oilfield developments in the country.
Host governments	Our Senior Leadership and local teams engage with local/national governments through meetings, discussions, surveys, advocacy and industry collaborations.	<ul style="list-style-type: none"><li>- Updates on business performance.</li><li>- Development of local content.</li><li>- Economic contribution.</li><li>- Job creation.</li></ul>	We continued our dialogue with host country governments in relation to Tullow's contribution to advancing national sustainable development agendas and supporting economic growth. We engaged with governments in connection with our operational developments and Shared Prosperity initiatives.
Local suppliers	We engage in ongoing business meetings, visits and discussions with suppliers. We also support supplier capacity building through local content activities.	<ul style="list-style-type: none"><li>- Opportunities to compete.</li><li>- Ethical procurement.</li><li>- Initiatives to help local suppliers reach the international standards required by the oil &amp; gas sector.</li></ul>	We maintained engagement and collaboration with a wide range of partners and suppliers in our host counties to advance transparency and opportunity for suppliers to compete for Tullow business. In particular, we launched new initiatives in Ghana, such as the Tullow Supplier Market Day, and a new local content reporting tool to enhance the transparency of local content initiatives.
Colleagues	Daily interactions through business activities and team meetings, engagement surveys and town hall meetings.	<ul style="list-style-type: none"><li>- Timely updates about the business and organisational changes.</li><li>- Opportunity to advance including for African nationals in their country.</li><li>- Fair compensation and benefits.</li><li>- Safe operations.</li></ul>	Our significant employee engagement processes included ongoing business updates and an Employee Engagement Survey mid-year. An important dialogue was held in Ghana relating to local currency depreciation and impact on pay, and a new dollarised pay system was adopted. Our Employee Advisory Panel also provided input on labour and workplace topics.
ESG experts and industry peers	Ongoing engagement through discussions, working groups / seminars.	<ul style="list-style-type: none"><li>- Share best practices.</li><li>- Seek advice on key issues.</li></ul>	We engaged with a range of experts on different topics relating to emerging risks and material issues within our industry and core geographies, and continued our active engagement with IPIECA.
Lending banks and investors	Hosting regular bondholder and bank meetings. The Board and senior leaders meet regularly with investors and banks.	<ul style="list-style-type: none"><li>- Timely and accurate financial statements.</li><li>- Business forecasts.</li><li>- Strong governance and ethical conduct.</li></ul>	We maintained our transparent reporting through our Annual Report and annual Sustainability Report, responding to questions in investor calls.
Non-governmental organisations	Engagement as needed on topics on a specific basis per organisation.	<ul style="list-style-type: none"><li>- Proactive disclosure on stakeholder engagement, governance, and economic, environmental and social impacts.</li></ul>	We progressed a wide range of NGO collaborations and projects in line with our Shared Prosperity strategy and objectives.

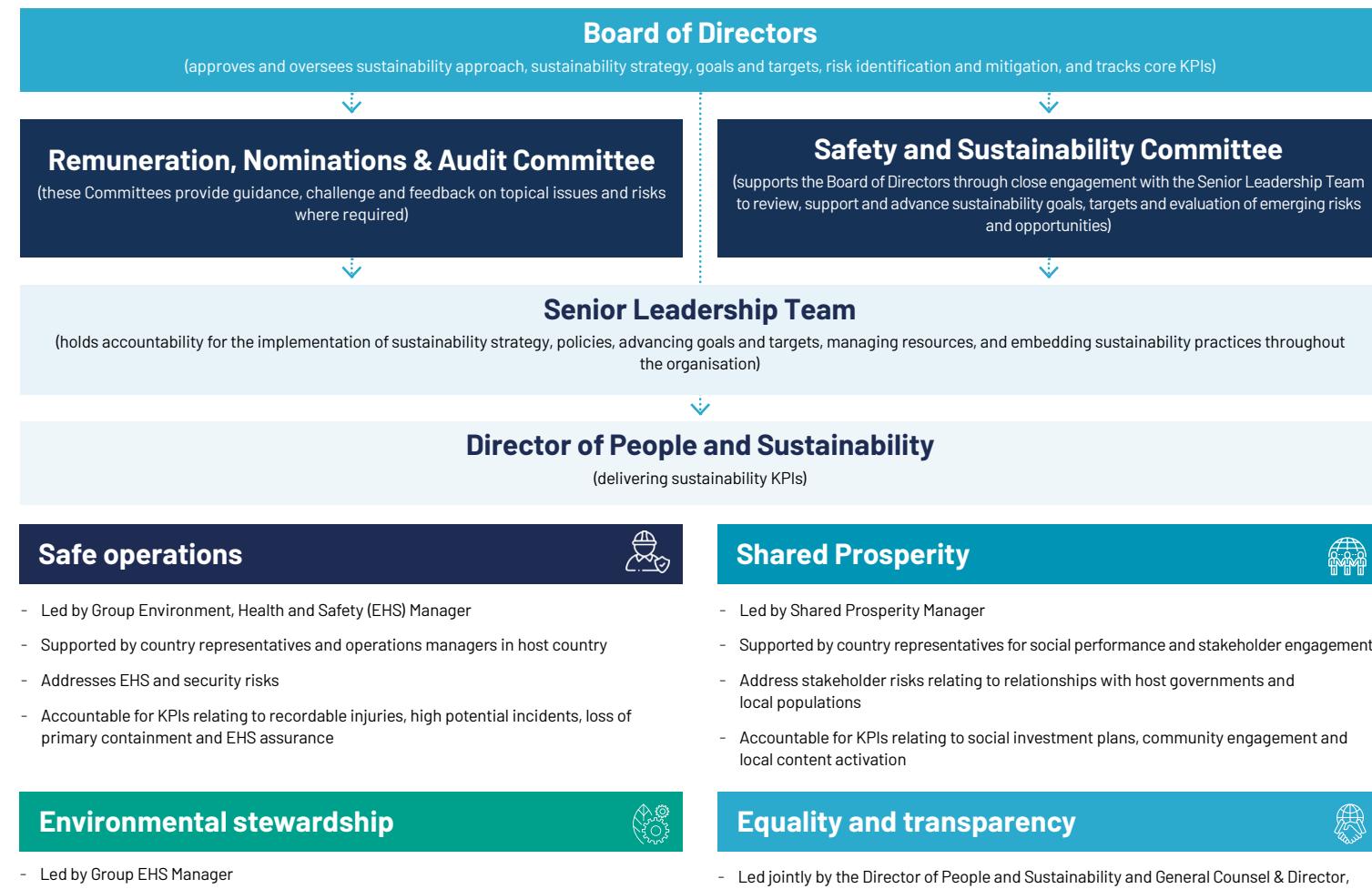


# Delivering with transparency and accountability

The oversight of our sustainability strategy plans and performance rests with our Board of Directors. The Safety and Sustainability Committee engages closely with Tullow's Senior Leadership Team to provide guidance on strategy implementation risks and opportunities, while supporting the Board of Directors by advising on decisions relating to sustainability. Within the Senior Leadership Team, reporting to the CEO, the Director of People and Sustainability oversees Tullow's performance and sustainability disclosure supported by a Group Head of Sustainability and networked teams across the organisation.

As a business committed to sustainable development, we are convinced of the importance of responsible oil and gas production as a means to support economic and social progress in our host countries. We believe this can be achieved without compromising our standards in respect of safety and environmental stewardship. Our strong partnerships at the local level and across our value chain continue to reflect our commitment to equality and transparency in the way we do business. //

**Donal Fitzgibbon,**  
Group Head of Sustainability





# Safe operations

Tullow invests in creating a safe workplace for all Tullow employees and contractors working on our sites, wherever they are. As a core pillar of our sustainability approach and supported at Board level through the Safety and Sustainability Committee of the Board of Directors, safe operations are at the forefront of our daily work and an important element of decision making at every stage of our operations.





# Occupational health and safety

## Safe operations



Following a return to work after the disruptions of the COVID-19 pandemic in 2020 and 2021, not only did we maintain the strong safety performance achieved in 2021, we were able to improve performance with zero lost time injuries and zero recordable injuries – this is the first time in our history that Tullow has achieved a full year of global injury-free operations. It comes as the cumulative result of continuous reinforcement of our safety leadership, culture and practices over several years and throughout 2022.

A step towards ensuring that we maintain an injury-free workplace is addressing high potential incidents (HiPos). With seven HiPos in 2022, the threat of a serious safety incident remains a concern. To reinforce safety thinking and practice, and reduce the chances of work-related injuries, we conducted incident investigation training with regular fortnightly coaching to embed investigation practices. We engaged an external safety coach to deliver training and coach our teams through the steps needed to thoroughly investigate incidents and identify measures to prevent recurrence. Specifically, we made an external coach available to support the investigation of actual HiPos throughout the year.

Safety, especially in a potentially high-risk industry such as ours, can never be left to chance. We insist on maintaining robust management systems, checks and controls to ensure that safe operations are top of mind for everyone who steps foot on our sites or is involved in our supply chain. In the Safety and Sustainability Committee, we review safety performance at each meeting and follow up all safety matters with urgency with Tullow's leadership team. //

**Mitchell Ingram,**  
Chair, Safety and Sustainability Committee  
of the Board of Directors

Safety Performance	2022	2021	2020
Lost Time Injuries Frequency (LTIF)	0	0.21	0.32
Total Recordable Injuries Frequency (TRIF)	0	0.43	1.27
High Potential Incident Frequency (HiPoF)	1.56	1.06	1.74
Workforce fatalities	0	0	0

**High potential incidents (HiPos)** are defined as any incident or near miss that could, in other circumstances, have realistically resulted in one or more fatalities

# Process safety

## Safe operations

Process safety relates to the prevention of major accident hazards, such as explosions, fires, and toxic releases associated with the use and production of chemicals and process fluids.

Tullow's process safety management system includes policies, standards and risk management activities covering all our operations from exploration, during production through to decommissioning.

Our systems aim to ensure that all hazards with the potential to lead to major accidents are identified and measures are undertaken to prevent and limit their consequences to people and the environment, with the aim of reducing risks to As Low As Reasonably Practicable (ALARP). We make appropriate preparations to respond to emergencies including any consequences beyond our site boundaries. In 2022, we maintained our pace of awareness and training to ensure process safety is upheld at all times, including:

- Completed our twelve-month campaign to engage front line workers on our implementation of the Association of Oil and Gas Producers (IOGP) Process Safety Fundamentals (PSF). We reviewed the implementation of PSF and observed that they are reflected in practices across our operations.
- Conducted Process Safety Risk Assessment training in Ghana using an external expert to provide training and work closely with the local technical team to address detailed aspects of risk management and safety incident prevention.

- Completed Human Factors Training for all our workforce, focussing on mitigating human errors at all stages of our operations to prevent safety incidents.

Process safety events (PSE)	2022	2021	2020
Tier 1	0	0	0
Tier 2	1	0	4
<b>Total</b>	<b>1</b>	<b>0</b>	<b>4</b>

Note: We deeply regret that there was a contractor fatality during a planned operation to dispose of expired explosives at a monitored site in Kenya.

Tullow Kenya fully investigated the incident with our Joint Venture Partners and has implemented measures to prevent recurrence.

**Tier 1 PSE** is a LOPC with the greatest consequence. This involves an unplanned or uncontrolled release of any material, including non-toxic and non-flammable materials, that results in serious injury or fatality, community evacuation, fire or explosion causing significant financial impact etc.

### Asset protection and emergency response

We do all we can to prepare our staff to rapidly adapt and respond to unforeseen events in order to maintain business continuity and minimise negative impacts on people, the environment, our physical and intellectual assets and our reputation. Our detailed and careful implementation of asset protection related policies, standards and plans incorporating security, business continuity, and crisis and emergency management (CEM) provide a strong basis for Tullow's ongoing preparedness to respond to any emergency.

In 2022, we continued our programme of emergency response training and exercises involving credible emergency scenarios. Specifically, we conducted a major emergency response training with the Jubilee FPSO, Tullow Ghana Incident Management Team and the Crisis Management Team in mid-2022.

**A Tier 2 PSE** is an LOPC with lesser consequence. This involves an unplanned or uncontrolled release of any material that results in a recordable injury, fire or explosion causing lower financial impact etc.

A full definition of Tier 1 and 2 PSE can be found on the IOGP website.

The Simulation Experience (SIMEX) scenario was completed with all the 'PEAR' (people, environment, asset, reputation) priorities being included and the exercise rehearsed the three response tiers from the FPSO offshore in Ghana to the CMT in London.

■ ■ I like to think of safety as an equation. Having a robust safe system of work coupled with a high degree of effective implementation equals operational safety excellence. However, this is not the entire truth. There are times when equipment may fail or external conditions may cause an unexpected incident. It is at these times when a deeply embedded safety culture and high levels of preparedness for abnormal situations and emergencies are needed most. That's why, at Tullow, we are never complacent and continuously seek to improve our operating management system including emergency response, enhance training and assure effectiveness. ■ ■

**Nichloas Gbordzor,**  
Ghana Safety Manager

# Global Wellness Agenda

## Safe operations



Wellness is a year-round priority at Tullow and we maintain a full suite of wellness programmes to support our colleagues in maintaining a healthy lifestyle.

We believe in helping our colleagues to meet personal wellness goals and that doing so contributes to a positive spirit at work and high productivity. In addition to our diverse wellness activities, we maintain an in-house occupational health nurse and clinical psychologist to provide support to colleagues as needed. This year, we also launched a comprehensive wellness intranet site to make it easier for colleagues to find information on our wellness programmes and our Employee Assistance Programme (EAP) which offers individual counselling on any personal issue including mental health challenges.

In 2022, our Global Wellness Agenda comprised a range of planned activities each month, including talks on addressing disease, workshops on sophrology and mental health,

Employee participation in wellness events throughout the year totalled more than

**2,550**  
instances, with an average participation of  
**7.1**  
events per colleague.

health checks, sports events and first aid training. We also launched the Global Tullow Book Club to encourage reading as a fun and stress-relieving activity with a social element of discussion on books read. In May, we provided all employees with a Wellness Afternoon Off, to give them personal time to rest and re-energise.

A focal point of the year was our annual global Wellness Fortnight in November, during which the entire company came together to participate in multiple health and wellness activities including a global exercise challenge, a virtualisation workshop and talks on cancer awareness, menopause and nutrition by leading experts in these fields.

### Health and wellbeing for contractors

Our promotion of healthy lifestyles extends to our partners and contractors working at Tullow sites. In 2022, for example, we held a contractor forum on the topic of Occupational Health and Wellbeing with an aim to promote awareness of health management and wellness practices. The event was attended by more than 50 representatives of 28 contractor companies, and covered topics such as fatigue management, stress and advice for general health and wellbeing in the workplace.



One Tullow sports event - Accra

“I think it is extremely important that companies think about the wellbeing of their staff. One can so easily get pulled into the day-to-day and work yourself into burnout. It's not easy stop and look after yourself. Our wellness programme at Tullow makes an important difference by helping colleague to value their own wellbeing and invest time in themselves.”

**Angela McDonald,**  
Human Resources Business Partner



# Shared Prosperity

We believe partnering with host governments to develop Africa's energy resources in a low-cost, environmentally and socially responsible manner can build a better future, adding a critical boost to local economies and creating Shared Prosperity for current and future generations.



# Accelerating progress

Prosperity is attainable when communities have access to reliable and affordable energy that enables people households and communities to improve their quality of life. It supports businesses that create local jobs and improves access to health, water and education. Tullow facilitates this through the responsible operation of our assets and zero tolerance for corruption and continuous tax transparency.

Shared Prosperity is our intentional strategy to go beyond access to energy and deliver economic and social benefits in our host nations. Our social investment in education and skills development enhances employability and enterprise development, including advancing livelihoods in agricultural sectors, to increase local entrepreneurship, providing not only financial resources but also the critical building blocks of long-term self-sufficiency and growth.

## Accelerating progress through partnerships

Through our Shared Prosperity strategy, we focus on amplifying our efforts in accelerating progress, by investing time and financial support and building partnerships with organisations that help us in:

- training for young people in market-relevant transferable skills that, enhance employability and entrepreneurship.
- strengthening job finding and support services to graduates and businesses.
- seed capital, mentoring and financial literacy training to entrepreneurs and businesses, especially in the agricultural

sector to increase local entrepreneurship and business performance.

- support to local companies in expanding capacity and capability, thereby optimising local content.

This is underpinned by:

- taking action to advance the positive and mitigate the negative environmental and social impacts associated with our business activities.
- maintaining deep dialogue, positive relationships and long-standing partnerships to understand the context, impacts and benefits, risks and opportunities associated with our business activities.

In this section, we share details of the progress made in:

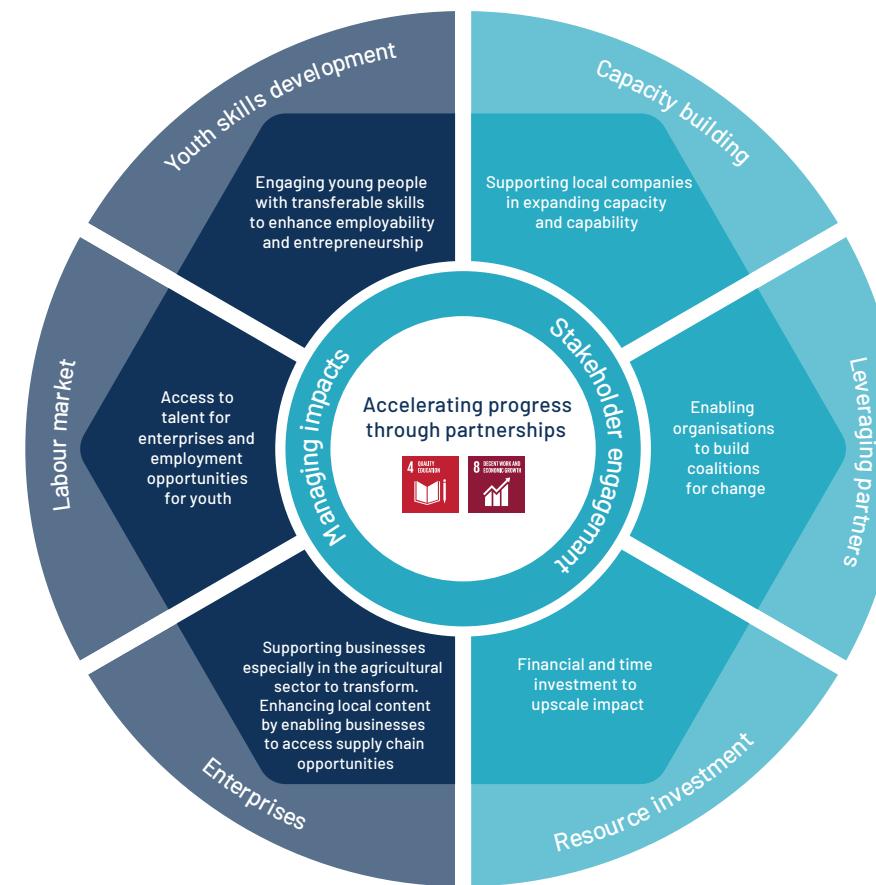
- Engaging our stakeholders, Accelerating young people's education and skill development.
- Transitioning from education to the labour market.
- Accelerating enterprise development and Optimising local content.



Our strategy directly addresses two of our priority Sustainable Development Goals (SDGs):

- #4: Quality Education
- #8: Decent Work and Economic Growth

## Building a better future through responsible oil and gas Shared Prosperity: Accelerating progress through partnerships



# Engaging our stakeholders

## Shared Prosperity

Our social performance teams in our host countries lead our stakeholder engagement initiatives, enabling Tullow to understand in real time how our business affects the quality of life in our local communities and gain an appreciation of current and future local needs as we implement our business plans.

Much of our engagement is voluntary, although community consultation is mandated by local governments in certain cases. In all cases, we listen carefully to our communities and welcome their active participation and insights which inform our business decisions. We believe this open dialogue and partnership approach supports our social license to operate and helps accelerate progress in delivering Shared Prosperity.

### Engagement in Ghana

In Ghana, the Petroleum Commission and Environmental Protection Agency of Ghana requires oil and gas producers by law to maintain a programme of participatory consultations in the local communities affected by their operations—in our case, this means 115 communities around our Jubilee and TEN operations. We maintain ongoing dialogue with these communities to build trust and create relationships in which any and all concerns can be amicably resolved.

In 2022, our Ghana social performance team engaged in many meetings with local stakeholders on a range of topics relating to activities around our Jubilee and TEN fields, and other social initiatives. Our outreach included the Maritime and Fisheries Enforcement Unit; the Ghana Navy; the Ghana Maritime Authority; the Marine Police and the Fisheries Commission



of Ghana as well as local fishing communities. A key discussion this year was the transition of security provided for our offshore platforms from our own contractors to the Ghana Navy.

This was seen as a significant change for local fishing communities and we worked to hear concerns and explain the advantages for them. So far, we have been able to encourage positive acceptance of this change.

### Engagement in Kenya

In Kenya, following the submission in late 2021 of our Upstream Environmental and Social Impact Assessment (ESIA) for the development of six oilfields in north-west Kenya, we await the public hearing of the National Environment Management Authority (NEMA) to solicit views and feedback about the development. In the meantime, in 2022, we were active in conducting our own outreach to all local authorities and communities which will be impacted by the development, including the National Land Commission (NLC) and all local community groups. We held several consultations to explain to local stakeholders

Working closely with our host countries and communities is a top priority for Tullow. To advance Shared Prosperity, we must understand the very real aspirations and concerns of both our local government and of the individuals in our local communities. Listening, sharing and facilitating dialogue are key elements of creating a shared agenda which benefits all. //

**Bethwell Sang,**  
Social Performance Manager, Tullow Kenya

the processes relating to the development, including the land acquisition process and commitments relating to land payments and/or resettlement. The response to date has been positive with no major concerns arising, and a strong willingness to participate in the upcoming land survey to be conducted by the NLC.

Additionally in Kenya, following national elections, we were active in building relationships through meetings with the newly elected Governor of Turkana and Members of Parliament, together with our Joint Venture partners. We briefed the new officials on our progress in the new oilfields development and listened to their views and priorities for the region. We look forward to maintaining close relationships as the project proceeds with an aim to deliver tangible economic and social benefits for the entire region and raise the quality of life for local communities.

# Accelerating young people's education and skill development

## Shared Prosperity

Education is the key to a thriving future. With seventy-four percent of the expected global population growth for youth aged 18–23 by 2035 being in Sub-Saharan Africa, this region still has the lowest participation rates in tertiary education in the world by a large margin.<sup>1</sup> In order to realise the economic and social potential of the region, achieving improved educational outcomes are critical. With a focus on STEM education, we aim to equip the youth of today with the knowledge and vocational building blocks that will enhance their employability in a world in transition. By encouraging and facilitating access to the technical skills needed for socioeconomic development in our host nations, we are making meaningful, fulfilling and impactful careers a reality for thousands of young Africans while advancing the promise of a better future for all.

At Tullow, our strategic educational engagements cover the full education lifecycle from primary school through to matriculation and university and even, through our Local Content strategy, ongoing job-related support, development and qualifications. Our educational programmes are delivered through multi-year partnerships that enable us to track progress and impact over time. Working with partners in Ghana, Kenya, Guyana and Suriname we enabled more than 9,000 students to access education in 2022, an increase of more than 1,000 students since 2021.

143 students have transitioned to tertiary education in Ghana, and we held mentoring sessions to support them in their learning and acquiring soft skills. Concurrently we supported teacher training to improve the quality of learning and over 250 teachers in 2022 attended STEM master classes and other training sessions in Ghana which are expected to benefit students.

Tullow's contribution to education in Ghana through an integrated approach to STEM learning commenced in 2017, starting with the impact on early years' education. 2022 marked the official opening of the latest model kindergarten in Aboardze/ Abuesi for 80 pupils, the 12th school that Tullow and Sabre Trust have worked on together in a partnership that has spanned more than 10 years. In addition to building model kindergartens, play-based training was also been provided to teachers, and the schools continue to provide early education to over 900 children.

In Ghana, since 2017, Tullow has partnered with Youth Bridge Foundation on the "Educate to Innovate with STEM programme" which continues to be recognised for creating an ecosystem that supports academic progression from basic to secondary education and from secondary to tertiary through digital innovations such as STEM radio, mobile STEM labs and STEM centres and career guidance and mentoring. Students from 25 junior high schools and 11 senior high schools participate in the programme.



Scholarship beneficiaries

"As a responsible oil and gas producer with a deep commitment to our host nations, we see ourselves as partners in creating a better future for all. There is no better place to start than with education, which unlocks opportunities for the youth of today to become the leaders of tomorrow, with the technical awareness and skills that our transitioning economies will need."

**Cynthia Lumor,**  
Deputy Managing Director, Tullow Ghana

1. "Steering Tertiary Education", World Bank Group, 2021 <https://documents1.worldbank.org/curated/en/394931632506279551/pdf/Steering-Tertiary-Education-Toward-Resilient-Systems-that-Deliver-for-All.pdf>

# Accelerating young people's education and skill development

Shared Prosperity

## Enhancing equitable access to education

Our multiyear flagship program to improve equitable access to education in Ghana is delivering transformational results. Our \$10 million commitment over five years (2020-2024) to promote enrolment in education at Free Senior High Schools (SHSs) was made in support of the Ghana Government's policy of providing free access to quality senior high school education. However, long distances that pupils from rural areas must travel to attend school is a significant limiting factor, preventing enrolment. Our investment in delivering high-quality dormitories in five schools and a classroom block at one school since 2021, is providing free accommodation for thousands of pupils, enabling them to enrol and attend classes at no disadvantage to city-based pupils. As at the end of 2022, we have provided accommodation and classroom facilities for 3,000 pupils. Feedback from school teachers indicates that the SHS programme by facilitating access to education has increased general enrolment for boys and girls by up to 30%, and has helped to reduce the pregnancy-related school-dropout rate for girls.

In 2022, we renewed our focus on ensuring the sustainability of the infrastructure projects at the end of the commitment phase including reviewing longer term support required.



“ This is a legacy project that has come on time to alleviate the numerous challenges hampering teaching and learning in our school. We will be committed to every arrangement that will sustain this infrastructure for the full realisation of its intended objective.”

**Principal,**  
Kikam Technical Institute

# Accelerating young people's education and skill development

## Shared Prosperity

### Improving education outcomes

Several of our initiatives are designed to encourage the uptake of STEM topics at school and university and improve educational outcomes. In 2022, we again advanced STEM programmes in our host countries:

**Awarding scholarships:** In 2022, over 154 Tullow STEM full and partial tertiary level scholarship recipients continued their studies at institutions in Ghana, Kenya and Guyana. More than 1,000 recipients of bursaries and scholarships at high school level continued their studies and more than 5,000 students accessed after school support, for example, through STEM clubs.

Tertiary level scholarships are awarded based on need and academic achievement; high school scholarships and bursaries are awarded based on either academic achievement and need or are solely on a needs basis in order to enhance broader access to education. Applicants are selected after a rigorous series of panel interviews, several of which Tullow staff participate in. The support provided to students ranges from tuition, study materials, internet access, uniforms, transport and food stipends.

**Supporting academic progression:** Our partnership with the Youth Bridge Foundation in Ghana continued to grow and deliver strong results. With Tullow's support, Youth Bridge Foundation supported 1,308 pupils to prepare towards Basic Education Certificate Examination (BECE) exams, and 608 final year

pupils towards West African Senior Secondary Certificate Examination (WASSCE). Pupils received BECE orientation, participated in mobile STEM clinics and received mentoring and, together with their teachers, attended 5-day pre-exam summits, held in seven coastal districts close to where Tullow is located, all with full support and collaboration of the Ghana Education Service and other educational partners.

A core part of this programme is counselling and cascading mentorship, whereby students at each stage of their learning receive support from advanced students and professionals share their experience with younger students. An "EDUconnekt" session was also held in early 2023 to support students transitioning to tertiary institutions.

In 2022, 620 STEM Bridge club members sat the WASSCE exam, of whom 127 students (20%) have transitioned to tertiary level, bringing the total number of STEM Bridge alumni in tertiary institutions to more than 478.

Alongside these formal educational programmes, the Tullow STEM Radio school maintained its reach to provide basic BECE orientation and other relevant STEM educational content to pupils tuning in from around the Western Region in Ghana.

The long-term impact of this programme continues to be monitored to track the progression of project beneficiaries from junior high schools through to senior high schools, tertiary education and the world of work.



Educate To Innovate With STEM ([youthbridgefoundation.org](http://youthbridgefoundation.org))

# Transitioning from education to the labour market

## Supporting entrepreneurship

A tech-focused foundation in Suriname which Tullow and JV partners have supported since 2019, IT-Core Foundation, helps young people to build skills in internet technology with a focus on practical innovation and acceleration to market.

IT-Core's annual hackomation attracts an average of 100 young developers, including graduates of the Tullow Codettes Foundation Boot Camp—in 2022, Boot Camp graduates took first and third place in the hackomation competition.

The IT-Core TechStarter programme offers young innovators an empowering space to take their ideas from development to market. In 2022, five pilot programmes launched with diverse tech innovations ranging from a cloud-based beekeeping application to AI based skills recruitment to internet-based agriculture. An additional programme, the Precious Plastics Trailer uses Tullow funding to take a "recycling factory on wheels" schools to teach the value of waste and opportunities to recycle and upcycle, leaving them with practical examples of products made from waste in the plastics trailer.



“ Our partnership with Tullow and JV partners has enabled us to expand our programmes and reach hundreds of young people, empowering them to deliver practical tech-innovation and build meaningful careers. We are creating a new cadre of tech-youth which is vital to a future thriving economy in Suriname.”

**Theo Boomsma,**  
Founder, IT-Core Foundation

# Transitioning from education to the labour market

### Supporting job-related skills

Helping individuals advance through building vocational or entrepreneurial skills that position them for success in generating a decent livelihood has always been a theme of Tullow's Shared Prosperity. In 2022 we delivered further progress:

#### **Supporting marine professions:**

Tullow continued to provide scholarships for cadets at the MATPAL Marine Institute to enable Guyana's growing workforce to take advantage of marine careers in the oil and gas industry, a sector critical to Guyana's economic development. In 2022, Tullow Guyana awarded scholarships for 11 cadets, bringing our total to 24 young Guyanese who are funded through this four-year program, starting with an immersive offshore experience. Upon certification, they can look forward to assuming marine roles such as deck officers onboard vessels and ships, or continue in higher education to become harbour pilots, health & safety officers or port inspection officers.

**Practical agricultural education:** In 2019, Tullow and JV partners partnered with KenGen Foundation to launch the Schools Green Initiative Challenge (GIC) tree growing competition in Kenya. More than 500 students and 56 teachers in 28 schools engaged in GIC

by planting over 9,000 tree species within their school compounds. GIC encourages school teams to sustainably manage the woodlots to provide the schools with renewable sources of wood fuel and reduce pressure on local vegetation and forest resources. The challenge is considerable, given the local dry weather conditions and the extended drought during the project period. Educational support is provided for all school teams, including ongoing monitoring. Rewards including scholarships, equipment and cash awards to schools with the highest seedling survival rate.

Originally planned as a two-year programme, COVID-19 related delays meant that GIC continued to run in 2022. As of late 2022, 24 out of 28 participating schools were able to keep a percentage of their seedlings alive. Seedling survival rates varied from 84% to 2%. More importantly, school children and their teachers learnt valuable agricultural skills, including water conservation techniques and awareness of suitable local tree species, and gained a new appreciation of sustainability. The learning from the GIC will also contribute to improving the outcomes of potential similar programmes.

### MATPAL Marine Cadets – success stories



“ I was motivated to become a cadet because of my fascination with ship operations and curiosity about what happens on board. The Tullow scholarship provided me with the opportunity to meet people from around the world learn from their experiences. ”

Cadet Rivaldo Europe



“ I wanted to travel and saw an opportunity to do this through becoming a Marine Cadet. Also, I liked the challenge of becoming a female in the maritime industry. I had to sustain myself without income throughout the programme but the training I received is helping me to build a maritime career. ”

Cadet Rebecca Samuels

# Accelerating enterprise development

## Shared Prosperity

Enterprise development is fundamental to supporting our host country communities to maintain sustainable livelihoods. We aim to assist local enterprises to gain the skills and opportunities to develop and grow their income while enhancing access to finance.

In 2022, we progressed on several fronts:

### Sustaining the fishing sector

The Fishermen's Anchor Project (FAP) is a micro credit scheme funded by Tullow Ghana and JV Partners and administered by OIC International. Planned over a five-year span from 2019, FAP aims to provide critical financial support to boost income and economic activity in fishing communities in the coastal districts of Ghana's Western Region. Fishing is the primary source of income in this region, providing jobs for more than 80 percent of the coastal communities. The seasonal nature of the fishing industry leads to high unemployment in the off-season.

FAP offers fishermen and local entrepreneurs training in financial literacy, credit management and business development and also provides low-interest, short-term loans to enable capital expenditure on equipment, supplement working capital or the establishment of a secondary income source. So far, after almost three years of operation, FAP has registered more than 2,565

people in the coastal communities, of which most are fishermen (canoe owners) and others are other small businesses providing related fishing services or pig farming. In 2022, hundreds of local fishermen received training in business record-keeping, financial management, marketing and customer relations and general business improvement practices.

Since its inception, including small loans disbursed in 2022, the economic reach of FAP includes:

- **GHC 3,883,900** (approximately \$300,000) disbursed in small loans.
- **Over 1,300** loan beneficiaries of which 91% were women.
- **89%** of the beneficiaries were fish processors.

To assure the sustainability of the fishing communities upon conclusion of FAP's commitments, the FAP partnership is now working to engage fishing communities in the establishment of a Fishermen Anchor Cooperative Credit Union. A Credit union will provide continuous, affordable and easily accessible financial services to enable fishing in Western Ghana to continue to thrive.

### Fishermen's Anchor Project – success stories



Cynthia Dadzie (above)

A credit beneficiary from Akwidae in Ahanta West District, established a Provision Store business to supplement her fishing business. Cynthia invested part of her savings from her fishing income to establish the store which provides an additional source of income to support her family.



James Essel (above)

A credit beneficiary from Upper Dixcove, established a new pig farming operation in addition to his fishing activities. James invested a substantial amount of his savings from fishing to the pig farm to provide essential additional income for his family during the off-season.

Moses Kwofie

A canoe owner from Lower Axim in Nzema East District, received financial support from the Fishermen's Anchor Project. This enabled him to purchase a new fishing net costing \$350 to help him operate more efficiently.

Cynthia Hobre

A credit beneficiary from Ankobra in Ellembele District, added a new business to her fish processing activity, providing a fufu pounding service in the Ankobra community. Fufu is a dough-like food made from ground plantain or cassava that is a local staple. The fufu business venture will enable Cynthia to supplement her family income throughout the year.

# Optimising local content

Local content is how we refer to advancing local businesses in our host countries. A fundamental pillar of our Shared Prosperity objective of accelerating progress through partnerships is the investment we make in nurturing local suppliers, engaging with them to enhance their capabilities to grow with Tullow and to expand their activities within the oil and gas industry in their home country and beyond. Leveraging our purchasing power as an inclusive operator, helping to create jobs and drive economic value in our host counties are fundamental to how we do business; this approach aligns with the aspirations of national governments while serving our growth objectives.

Tullow's local supplier spend in 2022 was

## \$173 million

(This represents a 15% decrease compared to 2021. This is mainly due to an increase in spend in Ghana with joint venture companies (JVs), where indigenous companies partner with international companies. JV spend increased 135% compared to 2021.)

Our approach to developing local content in Ghana, for example, includes:

- Increasing spend with indigenous companies.
- Expanding the scope of work where possible with local suppliers.
- Working closely with the Petroleum Commission to progress shared objectives.
- Providing information about our business to raise awareness and help suppliers meet our requirements.
- Maintaining active communications to ensure suppliers and stakeholders are aware of our local content initiatives.



2022 has been an intensive year of activity for local content in Ghana. We have progressed existing partnerships and driven new initiatives. We have engaged with more suppliers and partners than ever before, in the expectation that our engagement will help them grow and drive growth in the Ghanaian economy. We recognise that our business has the best chances of success when our suppliers and partners have the best chances of success.

**Dr Jennifer Bruce-Konuah,**  
Local Content Manager, Tullow Ghana

# Optimising local content

To improve the capabilities of indigenous companies and enhance their readiness to compete for Tullow's business, we continued to advance initiatives in Ghana including:

## Helping suppliers compete

Tullow Ghana continued its innovative collaboration with the Petroleum Commission of Ghana (PC), providing our industry expertise to advance local suppliers through the Ghana Upstream Petroleum Business Academy. We delivered four workshops in 2022, which provided a deep dive into relevant pre-tender topics such as helicopter services, cleaning and janitorial services, onshore security and additionally on the application of reverse auctions in our competitive tendering process and the benefits to suppliers. Tullow experts delivered content for all the workshops that attracted participation of between 80 and 120 suppliers per event. In addition, we held a fifth workshop to onboard 60 indigenous companies and employees to the Tullow Supplier Mentorship and Supply Chain Academy Programmes, consistent with our belief in the importance of extending knowledge to the wider supplier community and enable new suppliers to compete.

For information on the PC/TGL Business Academy, including workshop videos, please visit:  
[www.tullwoil.com/suppliers/local-content/](http://www.tullwoil.com/suppliers/local-content/).

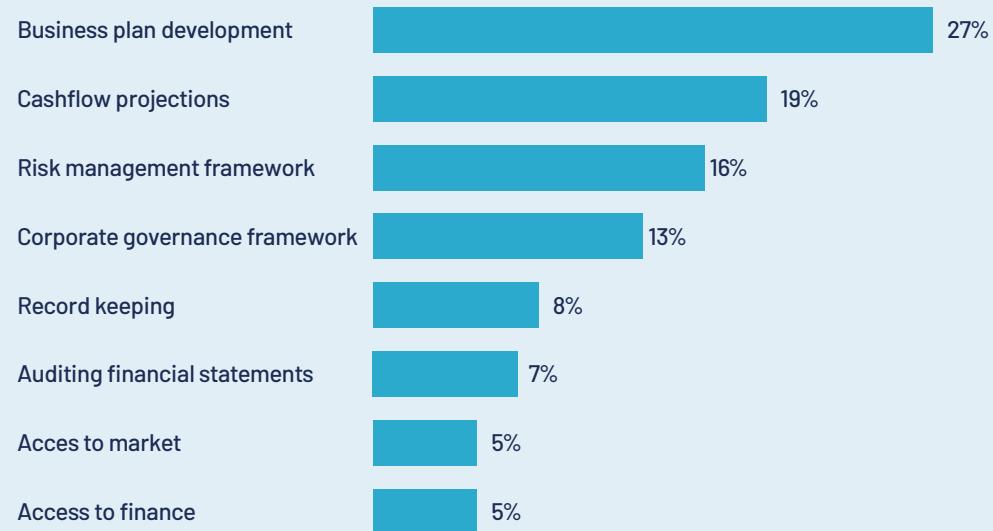
## Boosting finance and business skills

Business planning and financial management are critical to the success of any business. In particular, the effects of the COVID-19 pandemic had left many businesses in our host countries facing financial difficulty. Through our partnerships, we advanced programmes to support local suppliers in 2022, building on initiatives completed in prior years.

**Finance readiness:** In partnership with Invest in Africa, we launched the Tullow Supplier Finance Readiness Programme to equip current and potential Tullow Ghana suppliers and other registered businesses in the oil and gas sector to effectively engage with financial institutions to obtain business funding. Designed following a prior needs assessment, a two-hour virtual workshop was facilitated by Invest in Africa, attended by 158 suppliers of which 97 were incumbent Tullow Ghana suppliers. Additionally, 37 participating suppliers benefited from targeted support and follow-on consultation.

The organisation and delivery of this programme involved close to 3,000 hours of activity by the Invest in Africa team, in addition to Tullow Ghana's engagement and support. Feedback from participating suppliers was overwhelmingly positive, emphasising the practical application of the workshop content and consulting support.

## Primary supplier needs supported based on needs assessment in the Tullow Supplier Finance Readiness Programme



# Optimising local content

## Shared Prosperity

**Supplier mentoring:** In April 2022, in partnership with Accenture in Ghana, we launched the Tullow Supplier Mentoring and Training Programme for 200 suppliers and service providers in Ghana's upstream oil and gas sector. The programme consisted of two elements: (1) Providing 100 local suppliers with 50 hours of access for one year to Accenture Supply Chain Academy's i-cloud learning platform. The platform offers training across five curriculum pillars: finance, supply chain, digitisation, cyber security and power skills. (2) Providing a tailored one-on-one mentorship and coaching programme with customised business support to an additional 100 suppliers using individual and group sessions and digital modules. Participants included:

- **30** companies nominated by the Petroleum Commission.
- **6** employees of the Petroleum Commission.
- **5** women-owned businesses nominated by the International Finance Corporation (IFC).
- **59** indigenous companies from Tullow's supplier base.

Each supplier was provided with 22 days of access to digital content, cohort learning sessions, and dedicated ad-hoc business advisory support and a weekly 30-minute individual coaching session with an Accenture business coach. To track progress, we benefited from Accenture's Supply Chain Academy platform analytics capability to help shape the programme to meet evolving skills needs over time.

97 beneficiary companies and individuals successfully completed the programme and were awarded graduation certificates.

**Supplier capacity development and training initiatives have resulted in better quality and more competitive bid submissions from local companies over the past 12 years. We have seen a steady and significant increase in the value of contracts awarded to indigenous companies between 2010-2022. 67% of the total value of contracts awarded over the last 12 years has been with indigenous and joint venture companies that have indigenous participation.**

**Wissam Al-Monthiry,**  
Managing Director, Tullow Ghana

**"**The training was very useful for my organisation. We are at a stage where we need to mobilise funding for a major infrastructure project which will bring value to Tullow and other operators in Ghana. This training has thrown additional light on what we need to do to attract funding.**"**

**KYalley Ltd**



**"**The training threw more light on the reasons some banks would reject applications as we have had a similar challenge in the past. Now we know what criteria the bank uses to assess applications and this better positions us for success.**"**

**BAJ Freight**



# Optimising local content

## Expanding supplier dialogue and transparency

As part of Tullow Ghana's commitment to increase local participation in Ghana's oil and gas industry, we held our first Tullow Supplier Market Day in November 2022. The Tullow Supplier Market Day will continue as a quarterly in-person forum which provides suppliers with visibility of Tullow's procurement plans, facilitates direct feedback to Tullow's procurement team and encourages discussion of opportunities to increase local participation. The Tullow Supplier Market Day is a direct response to requests from suppliers to learn more about Tullow's procurement methods, improve their chances of winning tenders and gain insights into the company's procurement plans. The inaugural event was attended by 131 local companies and included a delegation from the Petroleum Commission of Ghana who provided information regarding local regulations and permits.

Also in 2022, we launched a quarterly Supply Chain Newsletter to keep the supplier community informed about Tullow's procurement activities and methods, upcoming demand and supplier development initiatives. The newsletter also enables us to share local content success stories and facilitate direct feedback and queries from suppliers and other local stakeholders.

## Amplifying transparency through the supply chain

In 2022, we launched a ground-breaking, proprietary Local Content Reporting Tool (LCR Tool) to enable significantly enhanced transparency of our local content impacts. The LCR Tool provides a single source of data for capturing the impacts of our suppliers through their own local content initiatives, which they commit to when contracting with Tullow Ghana. Presently, the LCR tool captures Tullow Tier 1 supplier spend on goods and services, employment, investment in facilities and social investments. This information is invaluable for Tullow, as it enables us to assess the effectiveness, reach and scale of our local content programmes and hold our suppliers to account. Similarly, local government can use the data to understand the broader benefits our business generates and the wider economic impact of our supplier spend, while suppliers gain a new platform to monitor and disclose their activities.

Initially, we commenced with 30 Tier 1 suppliers with contract values in excess of \$5 million. Training was provided both to for suppliers and for all our procurement and contract holder teams.

Data from the LCR Tool from January-June 2022 shows:

- **74%** of Tullow Ghana's total procurement spend was with indigenous companies.
- **85%** of total number of participating supplier employees are Ghanaian nationals.
- **\$474,000** and 23,700 hours invested in training Ghanaian nationals by participating suppliers.

## Local content recognition for Tullow Ghana



### 2022 Ghana Shippers Awards

Local Content Award of the Year  
(second consecutive year)

Most Transparent Shipper of the Year Award



### 2022 Ghana Oil & Gas Awards

Local Content Award of the Year

- **\$855,000** spent on social investment in education, health and enterprise development by participating suppliers.

We plan to assess this data regularly and use the information in business reviews with our suppliers. Similarly, we will extend the program to include more suppliers and contracts relating to different projects after the first full year of using the LCR Tool.

Supplier development remains an important component of Tullow's local content strategy. The Supplier Market Day is one of our key local content initiatives intended to enhance Tullow's visibility of opportunities. It allows us to deepen participation through regular quarterly engagements with the supplier community and our procurement teams.

**Wissam Al-Monthiry,**  
Managing Director, Tullow Ghana



# Environmental stewardship

Tullow is committed to acting as a responsible steward of the environment and ensuring robust systems are in place for assessing and managing environmental risk. We subscribe to the precautionary principle established in the Rio Declaration on Environment and Development in 1992 and promote sustainable development through our operations.

Our Ghana operations are certified to ISO 14001 Environmental Management Systems Standard, ensuring that the systems and processes which we apply to our key operating asset are consistently maintained. We aim to comply with all applicable environmental laws and regulations in all the countries in which we operate.



# Progressing our Net Zero roadmap

## Environmental stewardship

A key focus of our environmental efforts is our contribution to mitigating the effects of global climate change through our commitment to Net Zero. Additionally, we aim to minimise our water and waste impacts while protecting biodiversity.

As a business which depends on the natural environment to deliver value to host countries and all stakeholders, Tullow is acutely aware of the interdependencies between the business, the natural environment and the communities who enjoy the benefits Tullow's business brings. The Board of Directors is committed to overseeing Tullow's approach of acting with the utmost respect to nature and creating sustainable value. //

**Phuthuma Nhleko,**  
Chair, Board of Directors, Tullow

Tullow supports the goals of the Paris Agreement of 2015, namely, to hold the increase in the global average temperature to well below 2°C and pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels. We have committed to achieving Net Zero by 2030 on our Scope 1 and 2 GHG emissions on a net equity basis through a combination of decarbonising our operated assets in Ghana and identifying suitable nature-based solutions to offset our hard to abate emissions.

We are prioritising decarbonisation of our operations with a target to reduce emissions across our portfolio by at least 40% by 2025, on a net equity basis, against a 2020 baseline, through the elimination of routine flaring.

Supported by our internal Net Zero Task Force and approved by our Board of Directors and Senior Leadership Team, we have a defined pathway to achieving our Net Zero target by 2030.

### 2030 Net Zero Pathway (Scope 1 & 2 CO<sub>2</sub> emissions, on a net equity basis)



The two core components of our Net Zero pathway are:

- **Eliminating routine flaring:** By eliminating routine flaring of gas from our Jubilee and TEN fields by 2025, we will reduce GHG emissions by at least 40% from a 2020 baseline. The majority of spend linked to these decarbonisation initiatives will occur before 2025.
- **Nature-based solutions:** By investing in verified nature-based carbon removal projects in Ghana, we expect to be able to offset at least 40% of our residual, hard to abate GHG emissions.

# Progressing our Net Zero roadmap

## Environmental stewardship

### Eliminating routine flaring

An essential step on our pathway to Net Zero is the elimination of routine flaring, which we have committed to achieve by 2025. Flaring is an established method of disposing of gas that is generated through oil production in quantities that exceed our capacity to process it either for sale or for use as an energy source. By increasing our gas processing capacity at our Jubilee and TEN fields, we will avoid the need for routine gas flaring. Implementation of the changes necessary to eliminate routine flaring requires the shutdown of operations at each site to allow for switching out of core equipment and other upgrades. This activity is scheduled to occur during planned maintenance shutdowns to avoid disruption to production and supply.

**Jubilee FPSO:** Eliminating routine flaring at our Jubilee FPSO will be achieved through topside expansion works to increase gas processing capacity and gas compression capacity by around 35 percent in total. Increasing gas compression capacity requires replacement of all six current gas compressor electric motors with larger electric motor drivers. Additionally, a higher capacity compressor wheel will replace smaller capacity wheels on different compressor units. The efficient operation of these upgraded compressors is sufficient to process expected higher gas flow arriving at

the FPSO from current and new production wells. All motors have now been replaced, rewheeling of compressors and completion of the gas compressor control system upgrade is planned to for completion in 2023. Alongside the increase in gas compression capacity, we are increasing gas dehydration capacity by repurposing an existing unused process vessel which is also planned for 2023. Therefore, our plan is that all these changes will eliminate the need for routine flaring from our Jubilee FPSO by early 2024, ahead of our Net Zero commitment.

**TEN FPSO:** Routine flaring elimination on the TEN FPSO will be achieved through modifying our system to allow routing of low-pressure separated gas from a multi-functional separator vessel into the low-pressure gas compression system.

At present, gas routed through a multi-functional separator cannot be mixed with higher pressure separated gas from the FPSO's main high-pressure separator, meaning that excess gas must be flared. Upon completion of the gas flow modification, low-pressure gas will be routed to the appropriate system and flaring will no longer be required. These modifications require a full facilities shutdown are currently scheduled to be completed during the second half of 2023.



**Non-operated assets:** We take a proactive role in working with our partners at our non-operated assets to drive the elimination of routine flaring and pursue other emission reduction opportunities. Routine flaring on Ezanga, Echira and Turnix in Gabon ceased in 2021 and gas from these assets is now exported or utilised for power generation. In 2022, we supported routine flaring elimination at non-operated assets in Gabon:

- At the Limande field, a gas compressor was refurbished to increase gas compression capacity.
- In 2023, works sanctioned in 2022, are to commence on a project at the Simba and Tchatamba fields, that will reduce flaring.

# Progressing our Net Zero roadmap

## Environmental stewardship

### Partnering for nature-based solutions

We plan to mitigate our residual, hard to abate emissions through the implementation of nature-based carbon offsets, initially in Ghana, informed by the Oxford Principles for Net Zero Aligned Carbon Offsetting. In 2022, we completed a feasibility study on a Reduced Emissions from Deforestation and forest Degradation (REDD+) project which is aligned with the Government of Ghana's REDD+ strategy and its Nationally Determined Contributions under the global Paris agreement. The feasibility study identified key drivers of deforestation in the proposed project area and sought initial views from a range of stakeholders on potential intervention activities to conserve existing forest and restore degraded lands. This initiative is likely to enable us to meet our residual emissions commitments of approximately 600,000 tonnes of CO<sub>2</sub>e annually while generating significant local community engagement and positive biodiversity outcomes through reduced deforestation and improved land management, in line with leading climate and biodiversity standards. Additionally, this project will provide alternative livelihoods for local communities. We signed a Letter of Intent with the Forestry Commission in Ghana that will enable us to progress project structuring and due diligence ahead of an anticipated Final Investment Decision and project implementation in 2023.

### Accelerating carbon efficiencies

Across our operations, we seek to operate at the highest levels of carbon efficiency, and we continuously assess our activities for opportunities to avoid or reduce GHG emissions. However, our overall emissions performance is impacted by our continued need to support gas disposal by flaring. Our pathway to Net Zero includes plans to eliminate routine flaring to deliver a 45% reduction in total Scope 1 and 2 emissions (net equity basis) by 2025.

We continue to drive carbon efficiencies through our operations, and this can be seen in the approximately 75% reduction in Scope 2 GHG emissions recorded in 2022, compared to 2018. In the meantime, our Scope 1 emissions, correlated to production and associated flaring levels, show a further temporary increase in 2022.

We will continue to closely monitor these emission sources, until gas handling projects are completed on Jubilee and TEN.

In 2022, we also recorded a significant increase in Scope 3 emissions, which is due to an expanded basis of reporting, to include emissions associated with Tullow's value chain including purchased goods and services, capital goods and the use of sold products, in addition to the non-operated emissions, waste generated in operations, business travel, transportation and distribution and employee commuting we disclosed last year.

We are continuously working to better understand our Scope 3 emissions including with our supply chain partners to manage the emissions outside of Tullow's immediate operational control.

For details of our Scope 1, 2 and 3 greenhouse gas emissions for the years 2017-2022, please see our Sustainability Data workbook.

**Increasing solar power:** In 2022, we tripled the capacity of our PV solar array at our offices in Takoradi, Ghana from 131 kwh/year to approximately 390 kwh/year. The installation, once commissioned in Q1 2023, will provide all power needs for our Takoradi office.

Total operated emissions: thousand tonnes CO <sub>2</sub> e	2022	2021	2020	2019	2018
Scope 1	<b>2,258</b>	2,234	2,040	1,072	1,046
Scope 2	<b>0.81</b>	0.53	1.28	1.69	3.00
Scope 3	<b>6,680</b>	892	324	15	14
<b>Total</b>	<b>8,939</b>	3,127	2,365	1,089	1,063



# Progressing our Net Zero roadmap

## Environmental stewardship

### Climate-related financial disclosure

Our detailed pathway to Net Zero and managing climate risks to our business are laid out in our third annual Climate Risk & Resilience Report, prepared in line with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. This report provides an in-depth description and analysis of our approach in the following areas:

**Governance of climate change and climate-related risks:** Our Board of Directors holds accountability for our management of climate-risk and is supported by three of the four Board Committees, our Senior Leadership Team, managers throughout our operations and specialist consultants. The sustainability team leads the integration of climate risk management across the business.

**Strategy for managing climate-related risks:** In line with our belief that fossil fuels will remain part of the global energy mix for some time, and that oil and gas resources must be developed and produced responsibly, we have committed to and defined a pathway to achieve Net Zero on our Scope 1 and 2 net equity emissions by 2030, supporting our host countries in benefitting from the responsible development of natural resources wealth. We continued to test the resilience of our portfolio against International Energy Agency scenarios: the Net Zero Emissions by 2050 Scenario, Announced Pledges Scenario, and Stated Policies Scenario.

As a predominantly oil producing company with no downstream assets, the key financial risk for our business remains oil price.

We remain a resilient business, positioned to support our host nations in developing their hydrocarbon resources to promote sustainable and inclusive economic development.

#### Assessment of climate-related risks:

Tullow considers climate-related risks and opportunities as an upstream exploration and production company with limited exposure to impacts in the downstream and distribution aspects of the oil and gas sector. We continue to examine the interconnection of climate-related and other risks identified through our enterprise risk management processes, which provides a systematic approach of understanding, evaluating and addressing risks to ensure strategic objectives are achieved.

**Metrics and targets:** Tullow has a performance culture focused on achieving the key metrics and targets we set for the business, including performance indicators for the management of climate-related risks and opportunities. Tullow is committed to achieving Net Zero by 2030 on our Scope 1 and 2 net equity emissions, supporting the 2°C goal of the Paris Agreement. This is a target we are focussed on from the Board through to our operations team in Ghana, where we are focussing on decarbonising our operated production.

 See our 2022 TCFD-aligned Climate Risk & Resilience Report for further detail.



Board visit to FPSO

# Minimising our environmental impacts

## Environmental stewardship

Beyond carbon, we make every effort to minimise the impacts of our operations and engage as widely as possible across our value chain to identify environmental efficiencies and implement them collaboratively.

### Conserving our water

At Tullow, we aim to minimise our water impacts. In 2022, more than 83% of our water withdrawal was from seawater, with zero withdrawal from surface water sources or areas of water stress.

We recorded a 6% increase in water withdrawal in 2022, principally to support reservoir management. However, more than 99% of our total water withdrawn was discharged back to the sea, after treatment.

**Water as a community resource:** In 2022, we continued our management of community water boreholes for the benefit of local communities in our operating regions in Kenya.

On average, almost 20,000 households benefit from our water distribution which reaches approximately 4,000 cubic metres of water per year.



### Managing our waste

We aspire to reduce waste generated by our operations with a specific objective of achieving zero waste to landfill at all our sites.

In 2022, 74% of our waste was recycled or re-used and 17% was landfilled.

At Tullow Ghana, we have continued to implement a rigorous programme of waste segregation and waste management, aiming to reduce waste at source and recycle



wherever possible. All wood and fibre waste is recycled, and we reduce plastic waste by eliminating single-use plastics from our offices and offshore operations. Remaining plastic waste is recycled to make pavement blocks and other goods.

As a result, we reduced total non-hazardous waste by 25% in 2022, diverting more non-hazardous waste from landfill (69% in 2022 compared to 38% in 2021).

For the first time, we achieved zero waste to landfill over a two-month period at our Jubilee FPSO, and we continue to embed waste awareness and practices to ensure this is maintained.

**Avoiding plastic waste:** In 2022, we progressed a project to reduce single use plastic on the Noble Venturer, a drill ship. With a crew of approximately 180 individuals, working offshore in high temperatures, a regular supply of water to hydrate the crew was supplied in small plastic bottles, adding up to more than 180,000 plastic bottles per year. This has now been avoided with the installation of nine water dispensers connected to the potable piping system with the addition of stronger filtration for better taste. Crew members can reuse their own drinking containers for a steady supply of plastic-free water.

 For more on waste, see also a community project which reduces plastic waste in our environment in the section: Entrepreneurship for the environment.

# Minimising our environmental impacts

## Environmental stewardship

### Partnering for environmental stewardship

Across our operations, we seek to engage with Joint Venture partners, and other business partners and suppliers to combine our experience, insights and actions to deliver environmental benefits across the full scope of the Tullow value chain. Some examples of our practices and progress in 2022 follow:

**Ghana subsea development:** An example integrating environmental imperatives and carbon reductions in our project planning can be found in our subsea development project at the Ghana TEN oilfield, which is being progressed in partnership with the project management company, TechnipFMC. Right from the start, sustainability requirements were incorporated into the project charter and detailed project plans, including carbon reduction objectives and training for all contractors involved in the development project. Emphasis is placed on key areas such as:

- Fuel saving opportunities.
- Business travel optimisation.
- Locally fabricated subsea structures to minimise emissions from transportation.
- Technology transfer to enable completion of parts manufacture to avoid Carbon Zero intensive shipments from the U.S.
- Encouragement of contractors to adopt ISO14001 Environmental Management Standard.

**Ghana Well Engineering:** The Tullow Ghana (TGL) Well Engineering Sustainability Steering Group comprises all project business partners within TGL operations and aims to support our shared environment, health and safety goals. The Steering Group proactively drives initiatives to support safe and sustainable operations, reduce our operational carbon emissions, offer guidance and direction to departmental or project Green Teams and share best practice across companies and geographies. The Steering Group meets quarterly to discuss plans in detail and ensure the appropriate resources are available to progress tangible improvement plans.

■■ Our work in the Well Engineering Sustainability Steering Group facilitates a cross-company approach to any issue, whether it's an EHS risk or an improvement opportunity. Working in partnership with all those who have a stake in the success of our well engineering projects enables the best outcomes for our business, our partners and for our communities. ■■

**Kevin Burke,**  
Completion and Testing Manager,  
Well Engineering



Engaging contractors

**Noble Venturer:** The Noble Venturer Green Initiatives Team is a dedicated team which includes managers and EHS specialists from Tullow Ghana and the Noble Venturer. The team meets biweekly to discuss power management performance on the vessel and EHS improvement suggestions and follow up on commitments. A notable achievement of this team in 2022 was the elimination of plastic water bottles in use on board the vessel – see the section: Managing our waste.

**Engaging contractors:** In 2022, at Tullow Ghana's bi-annual EHS Contractor Forum, we led a session for more than 60 participating contractors under the theme: Reducing operational environmental footprint. The session focused on GHG emissions reduction and waste management and provided contractors with practical suggestions to make positive change in their own operations.

**World Environment Day:** An opportunity to raise awareness and leverage our partnerships to support global environmental initiatives, in 2022, we came together once again to take positive action for the planet. 200 volunteers from Tullow Ghana and partner companies engaged in tree planting and beach cleaning in Accra and Takoradi, jointly planting 500 trees and cleaning up more than 7.5 tonnes of marine litter from the local beaches. Additionally, Tullow's Well Engineering team visited the Airforce Primary School to educate students on waste disposal and other environmental practices.

# Protecting biodiversity

## Environmental stewardship

Tullow is committed to protecting the biodiversity of the regions in which we operate, and we strive to minimise negative impacts on biodiversity at the planning, exploration, development and decommissioning phases of our activities.

### Decommissioning assets

As we exit exploration or development operations in our host countries, our objectives are to leave oil field sites with no negative impacts on biodiversity or other environmental implications. We maintain a highly skilled team to manage outsourced professionals and specialist service providers to decommission our assets, ensuring that:

- All oil field infrastructure is hydrocarbon free.
- Potential for oil or gas leaks is eliminated by plugging and abandoning wells.
- All above and below surface infrastructure is removed and responsibly disposed of in accordance with As Low As Reasonably Practicable (ALARP) principles.
- No potential snagging hazards are left on the seabed.
- Tullow is compliant with applicable laws and regulations covering decommissioning.

Generally, decommissioning activities take years to complete, including ongoing monitoring and frequent surveys, although we aim for a shorter timeframe than industry practice where possible for the benefit of

local communities. Since 2016, Tullow has invested more than half a billion dollars in decommissioning assets in line with our guiding principles, which is reflective of our deep commitment to ensuring protection for both marine biodiversity and local communities as we move on from our exploration and development activities.

In 2022, we continued with our decommissioning activities in two regions:

**UK:** Drilling activity ceased in the UK in 2018, and we are currently nearing the completion of full and final decommissioning of operated and non-operated assets in this region. We have removed all drilling platforms and in 2022, commissioned a rock placement survey to enable us to proceed with protecting the seabed with sustainable local rocks, leaving it safe for fishing. We are proceeding with safe decommissioning of platforms in satellite fields, which is scheduled for completion by the end of 2025.

**Mauritania:** We are on track to complete our clearing and decommissioning activities from our fields in Mauritania following cessation of activity in non-operated areas in 2014. All seabed equipment and support facilities have been removed and final well head protections are being put in place, scheduled for completion in 2023, with zero residual impact on the marine environment.





# Equality and transparency

Equality and transparency are foundational elements of building trust. We aim to foster trust-based relationships across all our interactions both within our business and with external stakeholders.

Our commitment to building trust through equality and transparency means living our values, conducting ourselves in an ethical and compliant manner, operating within a framework of robust corporate governance, and maintaining positive partnerships and community relationships.





# Governance, compliance and ethics

## Equality and transparency

Robust corporate governance, strict compliance and an ethical culture and practice are the fundamentals of any successful business. At Tullow, we aim to build positive relationships and partnerships across our entire spectrum of activities and interactions, engaging honestly, openly and transparently on a foundation of trust.

### Corporate governance

Trust starts with establishing and fostering dependable governance and compliance practices and building a culture in which everyone is invested in doing the right thing.

Tullow's Board of Directors is keenly involved in providing oversight of Tullow's overall sustainability strategy and in particular, the implementation of our Shared Prosperity objectives. Sustainability-related topics are tabled on the agenda at every Board meeting, at which the Board receives updates on progress against Tullow's sustainability strategy and targets, approves new targets and reviews overall performance. The Board takes part in an annual two-day, off-site review, to which external experts are invited to present market and ESG trends and regulatory updates. In 2022, for example, the Board heard from a leading financial institution on ESG trends and disclosure requirements. During 2022, Tullow's Board of Directors continued to track our progress towards our Net Zero commitments and approve developments relating to our proposed nature-based solutions for offsetting hard to abate greenhouse gas emissions. Tullow's Board reviews and approves Tullow's sustainability-related public disclosures,

including our annual Sustainability Report and Climate Resilience Report in line with the Task Force on Climate-related Financial Disclosures (TCFD) framework.

The Board of Directors maintains four Committees, composed of non-executive directors, which assist the Board in meeting its responsibilities. These are:

- Remuneration Committee.
- Nominations Committee.
- Audit Committee.
- Safety & Sustainability Committee.

For more details of our governance structure and Board Committee charters and membership, please see: [www.tullowoil.com/about-us/corporate-governance](http://www.tullowoil.com/about-us/corporate-governance).

Every three years, the Board of Directors undergoes a performance evaluation conducted with the assistance of an external facilitator.

The last evaluation was conducted in November 2022. Details of key outcomes and recommendations can be found in the Nominations Committee Report, within our Annual Report and Accounts, p. 69 & p. 70.

### Safety and Sustainability Committee:

A key mechanism for supporting the Board of Directors' oversight of sustainability matters is the Safety and Sustainability Committee. This Committee, established in 2019, aims to enhance the Board's engagement in matters related to sustainability by conducting in-depth reviews of strategically important issues that are material for Tullow and providing guidance for the Board on these matters. The Committee presents an annual report to the Board of Directors covering ESG trends and regulatory developments, disclosure requirements and peer benchmarking.

In 2022, the Safety & Sustainability Committee was deeply involved in our review of our operations and maintenance (O&M) at our Jubilee FSPO in light of our plan to transfer O&M from MODEC to our in-house team. This required detailed planning and establishment of performance metrics to evaluate the success of the transition over time. The Safety and Sustainability Committee oversaw planning and transition arrangements, including presentation to the full Board of Directors for review and approval.

### Tullow board of directors (at 31 December 2022)

7

Total number of directors  
(including the Chair)

6 (86%)

Non-executive directors

4

Directors with oil and gas sector expertise

2 (29%)

Women directors

4 (57%)

Directors from ethnically diverse groups

45-68

(average age: 58)  
Age span of directors

1-8 years

(average years: 3)  
Tenure of directors

✓

Separation of Chair and Chief Executive Officer roles

4

Directors with financial expertise

4

Directors with ESG expertise

# Governance, compliance and ethics

## Equality and transparency

### Promoting an ethical culture

Our Code of Ethical Conduct (CoEC) governs the way we work and conveys a clear message to Tullow employees and external stakeholders about our approach to ethical standards, compliance and upholding human rights. The CoEC reflects our zero tolerance for bribery, corruption and other forms of financial crime as well as our position and controls related to human rights, lobbying and advocacy, preventing facilitation of tax evasion, anti-slavery and data privacy. All individuals and organisations involved in Tullow's extended supply chain and operations are contractually required to meet the standards of our CoEC, and we conduct risk-based third-party due diligence to assess risks related to ownership structure, anti-bribery and corruption, sanctions, trade restrictions, human rights and labour conditions. The CoEC is reviewed periodically to reflect updates in our business and expectations of our stakeholders.

In 2022, 100% of Tullow colleagues completed our mandatory annual online CoEC training and signed an acknowledgement of their understanding and acceptance. Participation in the CoEC training is strictly tracked to ensure participation by the entire workforce.

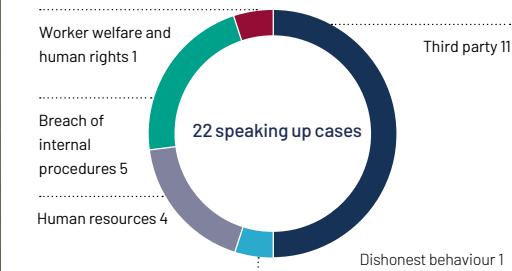
We also ensure our business partners and suppliers are familiar with our CoEC and are committed, as we are, to upholding its provisions. We provide annual training for key suppliers to ensure our expectations are clear.



**Speaking up:** We urge our colleagues to speak up if they observe behaviour which they believe is not in alignment with our CoEC. We encourage colleagues to report such matters without fear of reprisal, anonymously if they wish. Our independent, external integrity reporting mechanism is available 24/7 in several languages. All reported cases are reviewed and investigated by our Ethics & Compliance (E&C) team, with regular updates provided to the Audit Committee and Board of Directors. In 2022, we intensified communications to raise awareness and encourage colleagues to speak up if they

see a need. To facilitate unconstrained use of the reporting mechanism, we adopted a new reporting platform which offers improved functionality and easier access for users. At the same time, the new platform offers benefits for improved investigation of reported concerns and auditable progression of investigations. In 2022, the overall mix of reported concerns were similar to those in prior years and no major disciplinary actions were required.

### Speaking up cases 2022



### Risk management and due diligence:

Following the ethics and compliance risk assessment across our operations and extended supply chain, conducted in 2021 by an external advisory firm, in 2022 we have progressed addressing the recommendations resulting from this assessment. While there were no major or significant non-conformances, opportunities for improvement were identified and these are being progressively addressed. In 2022, we updated due diligence protocols and standards and introduced new procedures relating to conflict of interests, which provide greater detail and guidance for employees on different types of conflict of interest, the responsibilities of each employee to act in accordance with our procedures and how to receive guidance if required. Effective from 2023, every employee will be required to submit an annual Conflict of Interest Declaration.

# Governance, compliance and ethics

## Equality and transparency

### Respecting human rights

Tullow operates in many countries and our activities have the potential to positively or negatively impact communities and workers—including in our supply chains—and the environment. Our aim is to do no harm, remediate any negative impacts and show employees, communities, investors and other stakeholders that we operate ethically and responsibly.

Tullow's Human Rights Policy is aligned with the provisions established in leading international instruments such as the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights (VPSHR) and the ILO Declaration on Fundamental Principles and Rights at Work and related ILO conventions. We are committed to upholding human rights throughout our operations through ongoing monitoring and due diligence prior to entering a new host country and during our presence on a continuous basis.

During 2022, we advanced human rights due diligence and awareness, including:

- Formed an internal cross-functional human rights working group to collaborate,

monitor and manage human rights issues from diverse perspectives. The group includes members from legal, supply chain, human resources, EHS, ethics and compliance, internal audit and sustainability management functions.

- Conducted an internal audit of our modern slavery processes, which identified areas for improvement including renewed focus on monitoring and managing modern slavery in our supply chain. See also our 2022 Modern Slavery Act Transparency Statement.
- Piloted worker welfare training modules in conjunction with the International Petroleum Industry Environmental Conservation Association (IPIECA) with 14 people from across Tullow. The feedback from our colleagues was that the training was informative and useful for identifying and addressing worker welfare issues.
- Delivered "Introduction to the UN Guiding Principles on Business and Human Rights" training to all Tullow colleagues and contracted employees, achieving 100% participation.
- Raised awareness internally on Tullow's policy, responsibilities and commitments to upholding human rights through a series of intranet articles and ethics and compliance spotlights.

- Completed educational sessions on ethics and compliance, which included human rights for local companies in Guyana, with 129 participants from 111 companies participating in 2022.

In 2023, we will further invest in human rights assessment and controls with a focus on ensuring appropriate allocation of resources to human rights and ongoing training, including rolling out the IPIECA worker welfare online training to more employees.

Tullow has implemented the Voluntary Principles on Security and Human Rights (VPs) since 2010, was admitted as a participant in March 2013 and were members of the Steering Committee in 2019–2020. Tullow has also led the implementation of the VPs in Ghana. In 2022, we continued to use the VP approach in our local engagements in Ghana and Kenya and other areas in which we are active. For example, in Ghana, we work with the Ghana Navy to protect our offshore facilities, and with local communities to support a safe sea access framework for local fishermen. In Kenya, we work with the Kenyan Police Service to manage the security of our sites. In all our activities and partnerships, we apply the VPs and integrate them into our contracts with service providers.



■■■ Respecting human rights is foundational for everything we do. It goes beyond commitment—it's about regular, ongoing education and vigilance. We must ensure that everyone in our business and everyone who works with us knows what's needed, what's expected of them and how to take appropriate action. ■■■

**Caroline Ongeri,**  
Group Shared Prosperity Manager

# Governance, compliance and ethics

Equality and transparency 

## Safeguarding information security and data

Our business relies upon strong defences against information security threats which we identify as a key risk to our business continuity. Similarly, we are committed to protecting the privacy of all those who entrust us with their personal information, both through robust information security controls and detailed privacy procedures, authorisation hierarchies and training.

Our information security strategy comprises both information technology and digital security and is aligned to ISO 27001 Information Security Management Standard and The National Institute of Standards and Technology (NIST) framework. We apply industry best practice, supported by ongoing intelligence and risk management through our Enterprise Risk Register with controls which are based on NIST recommendations. We maintain mandatory e-learning on information security and data privacy,

including training on the General Data Protection Regulation (GDPR), for every Tullow employee and contractors at our sites, using our proprietary Information Security Standard Policy and Acceptable Computer Use Policy, among others. Each month, we conduct a monthly threat simulation exercise and review learning outcomes.

In 2022, we continued to enhance our systems and provide an active response to information security situations as they arose. Specifically, we worked closely with teams across the organisation to support the establishment of enhanced information security controls at our Jubilee FPSO following the integration of operations & management to our in-house teams.

As a result of our ongoing efforts to protect the information security of our business and the privacy of all those who engage with Tullow, our company has not been subject to any information or privacy breaches in the past year.



# Taxation



In line with our published Global Tax Strategy, Tullow takes a responsible approach to taxation.

We do not take an aggressive approach to the interpretation of tax legislation for tax planning purposes, nor do we use artificial schemes or tax havens to reduce the tax liabilities of the Group. We aim to pay our taxes on time in the jurisdictions in which our activities are undertaken in accordance with the domestic tax law or applicable production sharing agreement. When we enter new territories, our primary objective is to achieve clarity and certainty regarding the application of taxation rules through engagement with the authorities, so that we can ensure our compliance. We engage with governments on the development of tax laws either directly or through trade associations and similar bodies within the guidelines of our Code of Ethical Conduct. We conduct transactions between Tullow Group companies on an arm's length basis in accordance with the Organisation for

Economic Co-operation and Development Guidelines. The pricing of such transactions is based on fair market terms, reflects the commercial nature of the services provided, and is subject to review and audit by tax authorities in the jurisdictions in which we operate. Tullow's tax strategy is approved by the Board of Directors and reviewed annually by the Audit Committee.

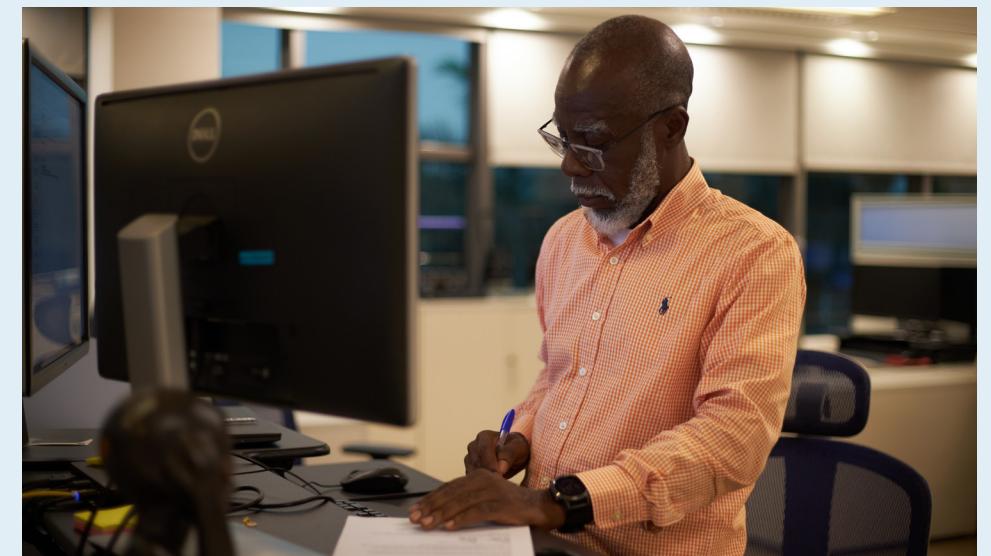
In 2022, we engaged a leading financial accounting firm to review our tax strategy and recommend opportunities for improved practice and disclosure. We discussed the outcomes of this review, which benchmarked Tullow against the tax disclosures of FTSE100 companies, in a workshop involving our Chief Financial Officer and other members of our financial and accounting teams. We continue to consider opportunities to improve our tax disclosures based on the learning gained from this valuable exercise.

## Disclosing our tax contributions

Tullow believes that public disclosure about our business and actions serves a broader agenda of openness to dialogue and builds accountability, credibility and trust. Transparency regarding payments to governments is an important way to promote honesty in our industry, mitigate corruption and support inclusive development. Tullow has been a corporate supporter of the Extractive Industries Transparency Initiative (EITI) since 2011, and we remain committed to promoting transparent disclosure of payments to government. Our annual Payments to Governments Report provides details of all mandatory and voluntary tax payments.

## Equality and transparency

Our payments to governments, including payments in kind, amounted to \$468 million in 2022 (2021: \$234 million). Total payments to all major stakeholder groups including suppliers and communities, as well as governments, brought our total socioeconomic contribution to \$645 million (2021: \$445 million). In addition to payments to governments, this included \$173 million spent with local suppliers and \$4 million in discretionary spend on social projects. Our total payments made to the Ghanaian Government in 2022 amounted to \$341 million (2021: \$172 million)





# Our people

## Equality and transparency

As a values-based organisation, we continue to engage our entire team at Tullow in advancing our sustainability strategy and creating Shared Prosperity through our activities in our host countries.

With a compact team, we rely upon every individual to play an important role in delivering positive outcomes for our business and our stakeholders, and in making our workplace inclusive, empowering and collaborative.

In 2022, we were focused on settling into an optimistic future of development and growth after some turbulent years of corporate turnaround, the COVID-19 pandemic, the discontinued merger plan with Capricorn Energy and changes in leadership. Our aims this year were to drive stability in our workforce and reset the baselines of organisational structure and performance and contribution to our longer-term growth plans. In particular, we supported the transition of in-house operations and maintenance of our Jubilee FPSO, an encouraging development for our team in Ghana, enabling for the first time in the past few years to build the organisation's capability and bring opportunity to advance our business in the region.

We onboarded 50 new hires in Ghana to meet this challenge while also continuing to reinforce our leadership with several senior hires in core business functions to refresh and revitalise our capabilities going forward.

### Employee Value Proposition



# Our people

## Equality and transparency

### Engaging our colleagues

We aim to foster an organisation in which all colleagues are motivated to live our values and support our purpose, while realising value for themselves in terms of meaningful work, professional growth and competitive compensation and benefits. The framework which encompasses this ambition is our Employee Value Proposition (EVP) and it is reflected in our human resources policies and programmes, training and communications.

During 2022, we continued to reinforce the different pillars of the EVP to enhance employee engagement and contribution.

**Employee Value Proposition Survey:** Our 2022 survey delivered an encouraging result. With close to 90% participation, we saw an average positive 70% score across the sum of all survey questions, an improvement from 63% and 62% in our two prior surveys.

#### Selected positive score results from our EVP Survey in 2022

Where I work, we never compromise our EHS performance in order to meet other targets	91%
In my team people are held accountable for results	90%
Teams in Tullow collaborate in the best interests of the company	81%
Tullow's vision, purpose and values are clearly articulated	79%
It is clear how my team's KPIs support the overall goals of the organisation. (i.e., we measure the right things that add value)	79%
I believe Tullow is committed to creating an inclusive and diverse work environment	69%

On the other hand, employees clearly expressed areas of opportunity, primarily in the areas of senior leadership responsiveness to employee suggestions and improved pathways to realise individual potential in work and career development planning. In 2022, we worked to address these topics and conducted a full evaluation of our performance management, leadership visibility and recognition programmes to meet employee needs and aspirations.



**Tullow Advisory Panel (TAP):** Aligned with our values of collaboration and creating a transparent and inclusive culture, the Tullow Advisory Panel (TAP) augments existing channels of communication between employees, senior management and the Board of Directors. TAP's membership is a diverse panel of eight elected colleagues representing employees from across our different locations. TAP meets quarterly with Tullow's Senior Leadership Team and separately, with the Board of Directors, to provide feedback collected from colleagues on a wide range of topics from staff development to employee workload to diversity and inclusion and more. In 2022, a focus of TAP's feedback to Tullow's leadership was the need to address the remuneration policy in Ghana where currency depreciation significantly disadvantaged those paid in local currency.

■ ■ ■ The TAP is a valued platform for engaging directly with our management and Board on the issues that employees feel strongly about. Its transparent structure and well-managed process gives employees confidence to raise issues with their peers and know they will be heard at the highest levels of the organisation. This encourages openness, trust and respect and contributes to a positive working culture. ■ ■ ■

**Jayde Morrison,**  
Chair of the Tullow Advisory Panel

# Our people

Equality and transparency 

## Rewarding our employees

We aim to provide market competitive compensation packages which we regularly review to keep pace with local market norms and employee expectations. Compensation is linked to our performance management process to ensure regular engagement between managers and their teams align performance and contribution with variable pay allocations. In 2022, we completed a major exercise to revise the compensation packages of our teams in Ghana. The local currency, the Ghana Cedi, declined by 55% between January and October 2022, among the steepest declines of any currency in the world this year. The impact of this was price hikes across a broad range of imported goods and a cost-of-living increase, leading to soaring inflation and economic difficulties for many. For example, the local price of a litre of milk increased 300% while a 5-kilogramme bag of rice increased by 220%. Our workforce in Ghana was severely affected by this economic development as, being compensated in local currency, salaries were no longer commensurate with a living wage. Action in response to employee feedback was taken to

review the impact on our Ghana colleagues and establish a compensation package linked to the U.S. dollar, the currency that drives the cost of primary imports, debt and consumer prices in Ghana.

By October 2022, we had implemented a dollar-linked salary across all employee categories in Ghana which represented an increase of 129% in base pay in local currency, compared to 2019. For 2022, specifically, we delivered a 44% increase in base pay in local currency, protecting employees against local inflation, as a result of currency depreciation.

**Gender Pay Gap:** Tullow continues to report in accordance with the Gender Pay Reporting set by the UK Government on a voluntary basis, as our reduced headcount falls below the legally applicable threshold for mandatory reporting. For UK permanent employees, Tullow has calculated the percentage difference in hourly pay for males and females for the month of April 2022 and the bonus paid over a 12-month period to April 2022. For more details, please see our 2022 Gender Pay Gap Report.



Kwame Ofori Afreh

■■ Tullow's immediate response to the currency depreciation in Ghana was a critical step to support our employees in a very concerning time. Many employees found themselves unable to pay basic household bills and some were running up serious debt. This is a superb example of Tullow living its values and ensuring a fair and empowering workplace for our local employees. ■■

**Kwame Ofori Afreh,**  
Human Resources Manager, Tullow Ghana

# Our people

## Equality and transparency

### Developing our colleagues

In 2022, we continued with our focus on professional development offering a minimum of 20 hours of training per employee and increasing our learning spend accordingly. We also reviewed the succession plans for our leadership roles and developed locationalisation plans and targets for critical roles in Ghana. Our Continuous Performance Management (CPM) process drove open and honest discussions about performance, opportunities to improve and skills needed to do so. 100% of Tullow colleagues participated in a performance review in 2022.

In particular, we focused on training for line managers in performance management and updated our processes to support effective evaluations, discussion and shared learning.

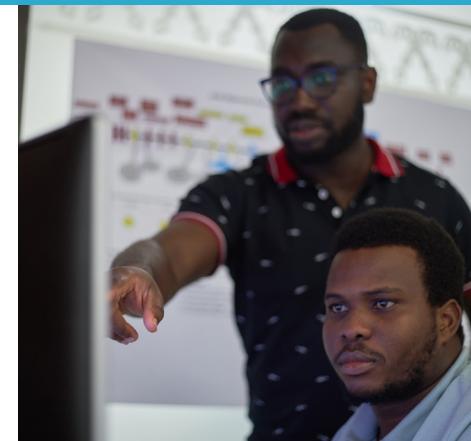
Our mentoring programme continued in 2022 with a second cohort of 25 managers being paired with senior leaders to assist managers with leadership and other skills and support them in navigating job challenges.

In 2022, we maintained all formal mandatory training relating to ethical conduct, compliance, health and safety and technical training.

### Accelerating diversity in the industry

We aim to create a culture of respect, openness and collaboration in which every individual is valued and empowered to contribute to the maximum of their potential. In 2022, we further reinforced our organisational values across all our human resources programming throughout the year.

**Inclusion and Diversity:** Inclusion and Diversity (I&D) are defining components of the way we work at Tullow, and we are proud of our culturally and geographically diverse team. Our I&D goals aim to drive equitable opportunity for African employees in different parts of our business and we are always seeking to support the development of women in our organisation given the historical challenges of advancing women in leadership in the oil and gas sector.



In 2022,

**27%**  
of new hires were women, and

**54%**  
of new hires were African.

#### Women and local nationals

	2022	2021	2020
Total women	<b>26%</b>	29%	30%
Women in senior management	<b>14%</b>	10%	18%
Local nationals	<b>77%</b>	81%	76%

### Our values

#### Do the right thing

- Keep each other, stakeholders, the public and the environment safe
- Be honest, respectful and transparent
- Comply with all relevant rules, regulations and policies

#### Collaborate

- Listen to, support and trust each other
- Constructively challenge
- Share knowledge and best practices

#### Take responsibility

- ‘Can do’ attitude and accountable for actions
- Be considered and effective in decision making
- Continuously improve

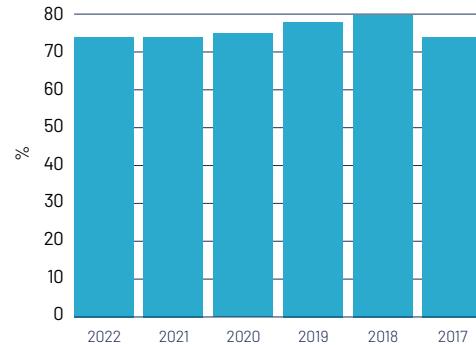
#### Make it count

- Focus on what’s important
- Take pride in what you do
- Have fun

# Our people

In 2022, we furthered our engagement with the Government of Ghana around our commitment to local skills development and local hiring. As always, our Shared Prosperity values drive our approach, and we expect to sign a Memorandum of Agreement on "Ways of Work" with the Government which will encompass our renewed commitments to localisation, developing people including internships and apprenticeships and other areas of collaboration to help to build resilience the Ghanaian economy through a skilled local workforce in an essential industry.

**% of local nationals employed in Ghana**  
(includes Tullow colleagues and contractors)



In 2022, we continued to support the development of our I&D culture with awareness and training events throughout the year. We commenced unconscious bias training for all employees (which will continue into 2023) and ran a speaker series focusing on I&D during our global wellness week. Further, we have been examining our processes to address barriers to inclusion and develop further opportunities in our hiring and development activities to advance women,

specifically in technical roles. We have adopted balanced panels in our recruiting processes and ensure each shortlist includes at least one diverse candidate.

**Women in Finance:** Tullow is a signatory to the Women in Finance Charter which demonstrates our ongoing commitment to improving the gender diversity of our workforce, particularly improving women's representation at senior levels within our finance function. In 2022, we maintained a level of 46% of female representation in our senior finance team in 2021, exceeding our goal of 40%.

**Localisation:** Our strategy of hiring local nationals and providing professional development for them as we continue to grow our business is one of the most important ways we can meet our commitment to the socioeconomic development of our host nations.

Localisation also serves our business objectives as it opens up a pool of exceptionally talented and motivated people to join our company.

Our objective in Ghana is to achieve 90% overall workforce localisation. At the end of 2022, we achieved 75% overall workforce localisation. Our refreshed localisation strategy sets us on the path to reach our target in the next 3-5 years.

## Equality and transparency

### Localisation – success stories



Eugene Nii Lanney Lanquaye- Mills  
Production Superintendent

I joined Tullow Oil right after my MSc studies in 2013. Tullow has offered many challenging opportunities, formal training courses as well as on-the job training which have allowed me to develop. I have worked in two technical departments under various managers who have provided me with mentorship, coaching and guidance required to get me to my current position as a member of the facility management team onboard the Self Operated KNK FPSO. I look forward to more challenging opportunities within Tullow.



Kingsley Koranteng  
TEN Offshore Field Manager  
I joined Tullow in 2012 and rotated through various roles in my initial year. I was privileged to be part of TEN project and part of the TEN first Oil Team. I since worked as a Well Integrity, and Production Ops Engineer both on TEN and Jubilee which has developed me to being the Field Manager I am today. My story is a true testimony of Tullow's commitment to Local Content Development and the opportunity for career growth and progression.



# GRI Content Index

<b>Statement of use</b>	Tullow Oil plc has reported in accordance with the GRI Standards for the period January 1st 2022 to December 31st 2022
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<b>GRI 1 used</b>	GRI 1: Foundation 2021
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<b>Applicable GRI Sector Standard(s)</b>	GRI 11: Oil & Gas
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**Key to location references:**

SR = 2022 Sustainability Report (PDF)

SPD = 2022 Sustainability Performance Data (data workbook download)

AR = 2022 Annual Report (PDF)

<b>GRI 2: General Disclosures 2021</b>	<b>Location</b>	<b>Omission</b>
2-1 Organisational details	SR p.3	N/A
2-2 Entities included in the organisation's sustainability reporting	SR p.3	N/A
2-3 Reporting period, frequency and contact point	SR p.3	N/A
2-4 Restatements of information	None	N/A
2-5 External assurance	SR p.3	N/A
2-6 Activities, value chain and other business relationships	SR p.4	
2-7 Employees	SR p.3 SPD	
2-8 Workers who are not employees	Unavailable	This will be collated for the next report.
2-9 Governance structure and composition	AR p.54-55	
2-10 Nomination and selection of the highest governance body	AR p.57	
2-11 Chair of the highest governance body	AR p.56	
2-12 Role of the highest governance body in overseeing the management of impacts	AR p.58	
2-13 Delegation of responsibility for managing impacts	SR p.10 AR p.58	

<b>GRI 2: General Disclosures 2021</b>	<b>Location</b>	<b>Omission</b>
2-14 Role of the highest governance body in sustainability reporting	SR p.38 AR p.59	
2-15 Conflicts of interest	AR p.91	
2-16 Communication of critical concerns	AR p.62	
2-17 Collective knowledge of the highest governance body	SR p.38	
2-18 Evaluation of the performance of the highest governance body	SR p.38	
2-19 Remuneration policies	AR p.73-74	
2-20 Process to determine remuneration	AR p.73-74	
2-21 Annual total compensation ratio	AR p.81	
2-22 Statement on sustainable development strategy	SR p.5	
2-23 Policy commitments	SR p.7	
2-24 Embedding policy commitments	SR p.10	
2-25 Processes to remediate negative impacts	SR p.40	
2-26 Mechanisms for seeking advice and raising concerns	SR p.39	
2-27 Compliance with laws and regulations	SR p.39	
2-28 Membership associations	SR p.7	
2-29 Approach to stakeholder engagement	SR p.9	
2-30 Collective bargaining agreements	Zero	
<b>GRI 3: Material Topics 2021</b>	<b>Location</b>	<b>Omission</b>
3-1 Process to determine material topics	SR p.7	N/A
3-2 List of material topics	SR p.7	N/A



# GRI Content Index

Material priority	GRI Standard	Disclosure location			Page	Sector standard	Omissions		
Employee health and safety	<b>GRI 3: Material Topics 2021</b>			SR p.12		GRI 11.9.1			
	<b>GRI 403: Occupational Health and Safety 2018</b>	<b>403-1</b>	Occupational health and safety management system			SR p.13 AR p.71-72	GRI 11.9.2		
		<b>403-2</b>	Hazard identification, risk assessment, and incident investigation			SR p.13	GRI 11.9.3		
		<b>403-3</b>	Occupational health services			SR p.14	GRI 11.9.4		
		<b>403-4</b>	Worker participation, consultation, and communication on occupational health and safety			SR p.12-13	GRI 11.9.5		
		<b>403-5</b>	Worker training on occupational health and safety			SR p.12-13	GRI 11.9.6		
		<b>403-6</b>	Promotion of worker health			SR p.14	GRI 11.9.7		
		<b>403-7</b>	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships			SR p.14	GRI 11.9.8		
		<b>403-8</b>	Workers covered by a health and safety management system			All workers.	GRI 11.9.9		
		<b>403-9</b>	Work-related injuries			SPD: Safety	GRI 11.9.10		
		<b>403-10</b>	Work-related ill health			SPD: Safety	GRI 11.9.11		
Process safety	<b>GRI 3: Material Topics 2021</b>			SR p.13		—			
	<b>None</b>		Process safety events			SR p.13	—		
Emergency response	<b>GRI 3: Material Topics 2021</b>			SR p.13		—			
Local content and capacity	<b>GRI 3: Material Topics 2021</b>			SR p.26		GRI 11.14.1			
	<b>GRI 204: Procurement Practices (2016)</b>	<b>204-1</b>	Proportion of spending on local suppliers			SPD: Local content	GRI 11.14.6		
Community development	<b>GRI 3: Material Topics 2021</b>			SR p.16-28		GRI 11.15.1			
	<b>GRI 413: Local Communities (2016)</b>	<b>413-1</b>	Operations with local community engagement, impact assessments, and development programs			SR p.16-28	GRI 11.15.2		
	<b>Social investment</b>	<b>203-1</b>	Infrastructure investments and services supported			SR p.16-28	GRI 11.14.4		
	<b>Grievances</b>		Report the number and type of grievances from local communities identified			SR p.17	GRI 11.15.4		



# GRI Content Index

Material priority	GRI Standard	Disclosure location			Page	Sector standard	Omissions		
Climate change	<b>GRI 3: Material topics Climate change</b>			SR p.30 Climate Policy		GRI 11.2.1			
	<b>GRI 201: Economic Performance 2016</b>	<b>201-2</b>	Financial implications and other risks and opportunities due to climate change			SR p.38 2022 Climate Risk and Resilience Report	GRI 11.2.2		
	<b>GRI 3: Material Topics 2021 GHG Emissions</b>			SR p.33		GRI 11.1.1			
	<b>GRI 305: Emissions (2016)</b>	<b>305-1</b>	Direct (Scope 1) GHG emissions			SPD: Environment	GRI 11.1.5		
		<b>305-2</b>	Energy indirect (Scope 2) GHG emissions			SPD: Environment	GRI 11.1.6		
		<b>305-3</b>	Other indirect (Scope 3) GHG emissions			SPD: Environment	GRI 11.1.7		
		<b>305-4</b>	GHG emissions intensity			SPD: Environment	GRI 11.1.8		
	<b>GRI 302: Energy (2016)</b>	<b>302-1</b>	Energy consumption within the organisation			SPD: Environment	GRI 11.1.2		
		<b>302-3</b>	Energy intensity			SPD: Environment	GRI 11.1.4		
Biodiversity	<b>GRI 3: Material Topics 2021</b>			SR p.36		GRI 11.4.1			
	<b>GRI 304: Biodiversity (2016)</b>	<b>304-2</b>	Significant impacts of activities, products, and services on biodiversity			SR p.36	GRI 11.4.3		
Water	<b>GRI 3: Material Topics 2021</b>			SR p.34		GRI 11.6.1			
	<b>GRI 303: Water (2018)</b>	<b>303-1</b>	Interactions with water as a shared resource			SR p.34	GRI 11.6.2		
		<b>303-2</b>	Management of water discharge-related impacts			SR p.34	GRI 11.6.3		
		<b>303-3</b>	Water withdrawal			SPD: Environment	GRI 11.6.4		
		<b>303-4</b>	Water discharge			SPD: Environment	GRI 11.6.5		
		<b>303-5</b>	Water consumption			SPD: Environment	GRI 11.6.6		
Spills	<b>GRI 3: Material Topics 2021</b>					GRI 11.8.1			
	<b>GRI 306: Effluents and Waste (2016)</b>	<b>306-3</b>	Significant spills			SPD: Environment	GRI 11.8.2		



# GRI Content Index

Material priority	GRI Standard	Disclosure location			Page	Sector standard	Omissions		
Waste and effluents	<b>GRI 3: Material Topics 2021</b>			SR p.34		GRI 11.8.1			
	<b>GRI 306: Waste (2020)</b>	<b>306-1</b>	Waste generation and significant waste-related impacts			SR p.34	GRI 11.5.2		
		<b>306-2</b>	Management of significant waste-related impacts			SR p.34	GRI 11.5.3		
		<b>306-3</b>	Waste generated			SPD: Environment	GRI 11.5.4		
		<b>306-4</b>	Waste diverted from disposal			SPD: Environment	GRI 11.5.5		
		<b>306-5</b>	Waste directed to disposal			SPD: Environment	GRI 11.5.6		
Compliance	<b>GRI 3: Material Topics 2021</b>			SR p.38		GRI 11.19.1			
	<b>GRI 206: Anticompetitive Behaviour 2016</b>	<b>206-1</b>	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices			No actions	GRI 11.19.2		
Anti-corruption	<b>GRI 3: Material Topics 2021</b>			SR p.38		GRI 11.20.1			
	<b>GRI 205: Anti-Corruption (2016)</b>	<b>205-1</b>	Confirmed incidents of corruption and actions taken			No incidents	GRI 11.20.2		
Inclusion and diversity	<b>GRI 3: Material Topics 2021</b>			SR p.46		GRI 11.11.1			
	<b>GRI 405: Diversity and Equal Opportunity (2016)</b>	<b>405-1</b>	Diversity of governance bodies and employees			SR p.46 SPD: People	GRI 11.11.5		
	<b>GRI 404: Training and Education (2016)</b>	<b>401-1</b>	New employee hires and employee turnover			SPD: People	GRI 11.11.4		
		<b>404-2</b>	Programs for upgrading employee skills and transition assistance programs			SR p.46	GRI 11.10.7		
Human Rights	<b>GRI 3: Material Topics 2021</b>			SR p.40 Human Rights Policy		GRI 11.17.1			
	<b>GRI 411: Rights of Indigenous Peoples</b>	<b>411-1</b>	Incidents of violations involving rights of indigenous peoples			No incidents	GRI 11.17.2		
			List the locations of operations where indigenous peoples are present or affected by activities of the organisation.			SR p.17	GRI 11.17.3		
			Report if the organisation has been involved in a process of seeking free, prior and informed consent from indigenous peoples for any of the organisation's activities.			SR p.17	GRI 11.17.4		



# GRI Content Index

Material priority	GRI Standard	Disclosure location		Page	Sector standard	Omissions
Tax transparency	GRI 3: Material Topics 2021			SR p.42	GRI 11.21.1	
	GRI 207: Tax (2020)	207-1	Approach to tax		SR p.42	GRI 11.21.4
		207-4	Country-by-country reporting		SR p.42 2022 Payment to Governments Report	GRI 11.21.7



### Policies:

Climate Policy  
Human Rights Policy  
Safe & Sustainable Operations Policy  
Code of Ethical Conduct

### Information about our reporting:

Sustainability Data  
Basis of Reporting  
GHG Emissions Scope & Calculation Methodology  
GRI Content Index  
Independent Assurance Statement

### Additional reports:

Climate Risk & Resilience Report  
2022 Payment to Government Report



Discover more about Tullow's approach  
to sustainability  
[tullwoil.com/sustainability/](http://tullwoil.com/sustainability/)

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