

Human Rights Policy

GOVERNMENTS HOLD THE PRINCIPAL RESPONSIBILITY FOR PROTECTING HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS. BUSINESSES ALSO HAVE A RESPONSIBILITY TO RESPECT HUMAN RIGHTS.

We are a young company, working in some countries where oil and gas development is new. We recognize that our industry has sometimes been associated with insensitivity to human rights and with poor development outcomes. But over recent years a greater understanding has been created of the ways in which these risks can be mitigated, including through: improving understanding of impacts and better use of baseline studies; the development of collaborative relationships to improve social welfare; measures to strengthen governance; support for transparency; and conflict-sensitive business practices.

These are complex issues for companies and our host societies alike. We may not always get things right. Where we don't, we will aim to remedy the situation, to ensure that lessons are learned and that mistakes are not repeated. Our commitment to act responsibly is strong and we will support our employees in making ethical business decisions.

We will comply with applicable laws in both our home and host countries. We support the Universal Declaration of Human Rights and will seek to apply relevant sections of the United Nations Guiding Principles on Business and Human Rights ('the Guiding Principles').

1. RESPONSIBILITY AND RESPECT

For us, human rights are not an abstract concept. They provide a framework through which we can ensure that we are behaving responsibly and respectfully to others; whether they are employees, contractors or external stakeholders. Respecting human rights is part of what makes us welcome as investors in our host countries and communities and is, therefore, an important element in retaining our license to operate.

Poverty is a major cause of people being unable to realize their human rights. Through the value that we

seek to generate, directly and indirectly, for our host societies, we can play a part in empowering individuals and communities to realize their rights in areas such as access to health facilities, education and clean water.

2. MANAGING OUR IMPACTS ON OTHERS

We will strive to ensure that our activities do not deprive others of their human rights. This requires us to exercise due diligence so as to understand and manage our impacts with the aim of, at a minimum, doing no harm. Due diligence should identify our actual and potential human rights impacts and should be a continuing process.

We recognize the importance of access to water and biodiversity for human health and for the ability of people to earn a living. That is why we have a strong commitment to good environmental stewardship and the efficient use of natural resources.

3. USING OUR INFLUENCE

Where it is practicable and lies within our power to do so, we will raise issues relating to the human rights of our employees and local communities with host governments, either directly or in collaboration with others.

4. IN THE WORKPLACE

We maintain a fundamental commitment to the safety of our employees and those who work with us. No one will be required to work in unsafe conditions.

Our employees will be recruited, promoted and remunerated on the basis of merit. We will not allow any unfair discrimination. We recognise the advantages of diversity in our workforce in broadening our perspectives, being seen to act fairly and in allowing us to recruit from the widest talent pool.

Intimidation or harassment will not be tolerated.

We recognise the fundamental labor rights, including to freedom of association. We will not permit child labor at our operations or tolerate slave or bonded labor or the unfair treatment of migrant workers.

We have in place mechanisms through which employees may raise matters of concern and workplace related grievances, including anonymously if needed.

5. ADDRESSING LOCAL IMPACTS

We will proceed with care and consideration for the dignity, customs, beliefs and cultural heritage of affected communities.

In addition to the benefits which may be created, we recognise the potential for the development of natural resources to cause rapid social changes which may trigger or exacerbate social conflicts. We will work to minimize this risk including through engagement to understand the context in which we are operating.

If our activities require the resettlement of communities then we will seek to act in accordance with international best practice, even if national legislation is less demanding.¹

We recognize the special position of indigenous peoples. As noted in international instruments, in many countries they have suffered from discrimination and marginalization. We will comply with relevant legislation and ensure that in our conduct we recognize the distinctive beliefs, affinity with the natural world and the cultural heritage of such groups.

The UN Guiding Principles make clear the importance of redress in the case of infringements of human rights. If a stakeholder believes that we have fallen short of the standards that we set out in our Business Principles or supporting policies, or have infringed upon their rights, we will provide mechanisms through which complaints may be raised and addressed in an accessible, predictable, timely and equitable manner (see Stakeholder Engagement and Community Development Policy). The issues raised through such mechanisms will be monitored and used as a source of continuing learning. We will seek to solve problems and achieve resolution through engagement and dialogue.

¹ Currently the IFC Performance Standard on Land Acquisition and Involuntary Resettlement

6. SECURITY

We will implement the Voluntary Principles on Security and Human Rights as the foundation for our security arrangements in each country where we have an established and continuing presence. We will seek to understand the underlying context of potential and actual conflict situations and how we may either ease or exacerbate them through our actions, including our security arrangements. We will seek to ensure that personnel engaged in providing security services to our operations have been vetted against prior involvement in human rights abuses; are appropriately trained; use only proportionate force and work within appropriate rules for the use of force; respect human rights; and are respectful in their interactions with people. We will ensure that timely and accurate details of security-related incidents are collected and reported both within Kosmos and to the appropriate authorities.

7. ACCOUNTABILITY, MONITORING AND REVIEW

Human rights cut across traditional corporate functions. Each relevant department or country unit will identify a member of management who is accountable for the implementation of this policy and whose performance will, in part, be assessed against it.

We will put in place arrangements for monitoring implementation of this policy, report periodically on our progress and review the terms of the policy from time to time.



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