

# Modern Slavery Statement 2018

THIS STATEMENT IS MADE PURSUANT TO SECTION 54 OF THE U.K. MODERN SLAVERY ACT OF 2015 (THE “ACT”) AND HAS BEEN APPROVED BY THE KOSMOS ENERGY LTD. (“KOSMOS”) BOARD OF DIRECTORS.

KOSMOS AND ITS SUBSIDIARIES ARE COMMITTED TO COMPLYING WITH THE REQUIREMENTS OF THE ACT AND TO TAKING ALL REASONABLE STEPS TO ENSURE THAT ALL TYPES OF MODERN SLAVERY, INCLUDING HUMAN TRAFFICKING AND FORCED LABOR, HAVE NO PLACE IN ANY PART OF OUR BUSINESS OR OUR SUPPLY CHAIN.

## I. ABOUT KOSMOS

Kosmos is a full-cycle deepwater independent oil and gas exploration and production company focused on the Atlantic Margins.

Our key assets include production offshore Ghana, Equatorial Guinea and U.S. Gulf of Mexico, as well as a world-class gas development offshore Mauritania and Senegal. We also maintain an exploration program balanced between proven basins (Equatorial Guinea and U.S. Gulf of Mexico), emerging basins (Mauritania, Senegal and Suriname) and frontier basins (Côte d’Ivoire, Namibia and São Tomé and Príncipe).

## II. GOVERNANCE

Kosmos is governed by its Board of Directors which determines the company’s strategy, approves key policies, and reviews operational and financial performance. The company’s [Business Principles](#), which articulate our commitment to transparency, ethics, health, safety, the environment, and human rights, include a clear statement opposing slavery and human trafficking.

Kosmos is also a member of the United Nations Global Compact and has adopted the United Nations Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights.

## III. HUMAN RIGHTS POLICY

As a key component of our Business Principles, our [Human Rights Policy](#) states: “We recognize fundamental labor rights, including 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.”

To ensure these requirements are implemented in our business, we conduct in-country employee, contractor and supplier training on labor rights and compliance with our Human Rights Policy. We have also used third party experts to conduct human rights and labor rights risk assessments of our operations in some countries to better understand our risks during different phases of operations.

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In keeping with our [Human Rights Policy](#), Kosmos maintains grievance mechanisms in all countries of operation through which employees, contractors, and other stakeholders may raise matters of concern and workplace related grievances. Kosmos also maintains a Whistleblower Hotline as a vehicle for employees, contractors, third parties and others to report anonymously, without risk of retaliation, potential violations of any Kosmos policy. We provide training and information about our Whistleblower Hotline in the official language of each country where we operate, emphasizing the aim, accessibility, and confidentiality of the mechanism. We investigate any potential violations of our policies and determine if the responsible party can implement corrective actions or if we need to terminate the relationship. When appropriate, we will also report violations to local authorities.

#### IV. SUPPLY CHAIN DUE DILIGENCE AND RISK ASSESSMENT

We are committed to maintaining effective systems and procedures to prevent modern slavery from taking place within our operations or our supply chain. The primary risk of encountering modern slavery in our supply chain concerns our reliance on both international and local suppliers in the countries where we operate. We exercise care in the selection of vendors, suppliers, and contractors, and we convey to them that we expect the same high standards of conduct from them that we observe in our own company.

Our vetting process includes background checks and thorough onboarding to ensure alignment with Kosmos’ values and policies. In 2017, Kosmos modified its Master Services Agreements which expressly requires contractors to respect internationally recognized human rights, including not employing forced labor, trafficked

labor or exploitative child labor, among other requirements that protect workers from inhumane treatment and discrimination.

In 2018, we focused on implementing our policies, procedures and systems across our expanded portfolio, which now includes production operations and infrastructure-led exploration offshore Equatorial Guinea and the U.S. Gulf of Mexico. Our contracts with vendors contained language protecting against modern slavery – more than 600 in total covering eight countries.

We have also fully transitioned into a non-operator role on our largest development project, the Greater Tortue Ahmeyim liquefied natural gas (LNG) project offshore Mauritania and Senegal. While acting as a non-operator, we supplement the operator’s management systems with on-the-ground assessment of human rights risks. This includes field visits of project sites, stakeholder interviews, and assessing the operator’s social performance.

#### V. OUR FORWARD PLANS

We are committed to improving our assessment and management of potential risks associated with slavery and human trafficking. In 2019, we are focusing on further embedding our practices in new countries of operation, including countries where we are establishing a Kosmos office for the first time. This will involve training new staff and deepening our engagement with contractors and co-venturers on the broad range of human rights and labor rights issues.



**Andrew G. Inglis**  
Chairman of the Board of Directors  
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