

Modern Slavery Statement

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 along 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 a sustainable exploration program balanced between proven basin infrastructure-led exploration (Equatorial Guinea and U.S. Gulf of Mexico), emerging basins (Mauritania, Senegal and Suriname) and frontier basins (Namibia, Sao Tome and Principe, and South Africa).

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. In 2013, the Board of Directors adopted the company’s [Business Principles](#) which articulate our commitment to transparency, ethics, health, safety, the environment, and human rights – including a clear statement opposing slavery and human trafficking. Policies and processes underpin these commitments, including The Standard, our management system that establishes the expectations

for managing Health, Safety, Environment and Security (HSES) risks throughout the Company. These processes help to ensure we are identifying and mitigating human rights risks—for instance, through Environmental and Social Impact Assessments, which we conduct for all seismic, drilling, development, and production activities.

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 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.”

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 also use third party experts to conduct human rights and labor rights risk assessments of our operations to better understand our risks during different phases of operations.

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.

In 2019, we reviewed and updated our country-specific grievance mechanisms based on the framework set out by the United Nations Guiding Principles on Business and Human Rights. We used the framework's eight "tests" to guide our review (accessibility, predictability, legitimacy, transparency, equity, rights compatibility, a source of continuous learning and a basis on engagement and dialogue).

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. Kosmos' Master Services Agreements expressly require 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 2019, we continued to embed our policies, procedures, systems and behaviors across our portfolio. This included updating contract templates in our U.S. Gulf of Mexico operations to include human rights expectations, as well as deepening our engagement with NGOs related to our operations in Equatorial Guinea.

As a non-operator in the Greater Tortue Ahmeyim liquefied natural gas (LNG) project offshore Mauritania and Senegal, we have continued to support the operator's management systems with our own engagements and independent, on-the-ground assessment of human rights risks. In 2019 this work included:

- Visits to project sites, including the ports in both countries and a quarry in Mauritania that was under consideration as a source for raw materials
- Ongoing direct engagement with the project's host communities in southern Mauritania and northern Senegal
- Regular engagement with the operator's Head office and local offices to maintain alignment on expectations, including contractor behavior and human rights

V. OUR FORWARD PLANS

As the impact of COVID-19 mitigation measures result in growing economic pressures in the countries where we operate, we recognize that human rights risks in global supply chains may also increase. In addition to our rigorous approach to supply chain management, we will be paying particular attention to potentially vulnerable workers in our supply chain—working to ensure they receive fair treatment and pay during this very difficult period. We will do this by maintaining a vigilant line of sight into those businesses that provide us with goods and services. These efforts are enabled by the close relationships we maintain, and the deep commitment of our staff to serve as a force for good in the countries where we operate.



Andrew G. Inglis
Chairman of the
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