

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.

ABOUT KOSMOS

Kosmos is a leading deepwater exploration and production company focused on meeting the world’s growing demand for energy. Our assets include oil production and exploration in proven basins offshore Ghana, Equatorial Guinea, and the U.S. Gulf of Mexico, as well as a world-class gas development offshore Mauritania and Senegal.

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. Numerous 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 operated 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.

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 risk-based 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 in-country 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 concerns related to our operations. Our country-specific grievance mechanisms are based on the framework set out by the United Nations Guiding Principles on Business and Human Rights. We use the framework's eight "tests" to help ensure these mechanisms are effective (accessibility, predictability, legitimacy, transparency, equity, rights compatibility, a source of continuous learning, and a basis on engagement and dialogue).

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.

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 and our supply chain. The primary risk of encountering modern slavery in our supply chain is in 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

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of conduct that we observe in our own company from them and their vendors, suppliers, and contractors.

Our vetting process includes background checks and thorough onboarding to ensure alignment with Kosmos' values and policies. For example, Kosmos' Master Services Agreements expressly require contractors to respect internationally recognized human rights, including a commitment not to employ forced labor, trafficked labor, or exploitative child labor, among other requirements that protect workers from inhumane treatment and discrimination. We investigate any observed or reported violations of our policies and determine if the responsible party can implement corrective actions or if we need to terminate the relationship.

In 2020, three items in particular shaped our human rights related risks: (i) the impacts of the Coronavirus (COVID-19) pandemic, (ii) a change in the Company's focus from frontier exploration to infrastructure-led exploration near proven basins, and the resulting changes to our exploration portfolio, and (iii) the continued development of our Greater Tortue Ahmeyim liquefied natural gas (LNG) project offshore Mauritania and Senegal.

Early in the pandemic, we took immediate and decisive action to protect the health and safety of our employees and contractors, reducing the risk of COVID-19 spreading in our operations and minimizing the impact on our business. Much of our supply chain activity in 2020 centered on pandemic relief as we worked with host governments to distribute much needed medical supplies and with local community partners to address growing food insecurity. We maintained our rigorous compliance and due diligence processes throughout these efforts

In 2020, we also made significant changes to our exploration portfolio by divesting interests in four frontier exploration countries, including all but one of our exploration licenses in São Tomé & Príncipe, and all of our interests in Suriname, Namibia, and South Africa. As we engaged the buyer of these assets and worked to responsibly exit multiple countries, we included our human rights and social performance experts on the transaction team to assist the buyer with due diligence, prepare them for success in-country and ensure a responsible transition by Kosmos.

We expect that these changes to our exploration strategy and portfolio will result in a decrease in the human rights risks of our supply chain as we focus our activities more on the proven basins where we already operate, including the U.S. Gulf of Mexico. Operating in proven basins enables the use of suppliers with established industry track-records, whereas frontier exploration requires the identification, assessment and onboarding of new and sometimes unfamiliar suppliers. This portfolio shift also allows us to deepen engagement with existing contractors and subcontractors working in proven basins

Lastly, 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 engagement and independent, on-the-ground assessment of human rights risks. In 2020 this work included:

- Visits to project sites in both countries;
- Ongoing direct engagement with the project's host communities in southern Mauritania and northern Senegal; and
- Regular engagement with the operator's Head Office and local offices to maintain alignment on expectations, including contractor behavior and human rights.

OUR FORWARD PLANS

Although the COVID-19 crisis is beginning to abate, we are assessing the impacts the pandemic has had on our industry and on our host governments. During this next phase of recovery, we recognize that companies and governments will push to accomplish more on accelerated timelines. If not managed carefully, this new operating context could increase human rights risks for workers. Therefore, we will continue to be vigilant in our engagement with project operators, as well as within our own supply chain to ensure that we keep our commitments around working hours, working conditions and living wages. We will also continue looking for innovative ways to act as a force for good in the countries where we operate, and are confident that Kosmos, and the communities where we work, will emerge stronger.



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