

# Modern Slavery Statement

THIS STATEMENT IS MADE PURSUANT TO SECTION 54 OF THE U.K. MODERN SLAVERY ACT OF 2015 (“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 SUPPLY CHAIN.

## ABOUT KOSMOS

Kosmos is a leading, independent deepwater exploration and production company. 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 the business plan and key policies, and reviews risks and operational and financial performance. In 2013, the Board of Directors adopted the company’s [Business Principles](#) which articulate how we conduct our business and the standards to which we hold ourselves accountable. They describe our commitment to transparency, ethics, health, safety, the environment, and human rights – including a clear statement opposing slavery and human trafficking. Our Business Principles have been available on our website since 2013, are communicated widely to employees, and are supported by various policies, procedures, and management systems.

Kosmos uses an enterprise risk management (ERM) process at the corporate and business unit level to identify, assess and mitigate risks to our business. This process embeds risk analysis into the decision-making processes of each business unit and aligns the management of business unit risks with those of the company overall.

The ERM process requires risks to be assessed on a recurring basis by senior management and the most critical risks are subsequently reviewed with the Board of Directors.

Engagement with partners is critical for managing human rights risks. We regularly review and assess operator management systems to ensure alignment with our own standards. This work includes:

- Visits to in-country operations or project sites;
- Direct in-country operations’ engagement with the project’s host communities; and
- Engagement with the operator’s head office and local offices to maintain alignment on expectations, including human rights.

## HUMAN RIGHTS POLICY

Kosmos is committed to respecting human rights and we expect our employees, contractors, partners, suppliers, and co-ventures to share our commitment. We are signatories to the United Nations' Global Compact, a set of principles covering human rights, labor, environment and anti-corruption. Kosmos is also committed to implementing the U.N. Guiding Principles on Business and Human Rights and adheres to the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Our [Human Rights Policy](#) further details our expectations concerning respect for human rights everywhere we operate and includes a clear statement that we do not tolerate child, 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 have operations, 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 stems from 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 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.

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Throughout 2021 we remained attentive to the potential of the COVID-19 pandemic to impact our industry and the people in our workforce, supply chain and in the communities where we operate. We were careful to ensure any changes working conditions as a result of the pandemic did not increase human rights risks in the workforce. We developed return to work guidance in accordance with the Centers for Disease Control and Prevention (CDC). We were diligent about maintaining safety standards and took an active role managing contractor safety performance.

In 2021 we acquired additional interest in the Jubilee and TEN fields offshore Ghana. Growing our investment in Africa is aligned with our strategic objective to support the just energy transition and deliver tangible economic and social benefits for the country and its people. Our experience with the assets in Ghana means we are familiar with the working conditions, as well as the supply chain risks. Increasing our presence allows us to deepen our engagement with the operating joint-venture partner, and existing contractors and subcontractors, to mitigate human rights risks.

## OUR FORWARD PLANS

At Kosmos we strive not just to provide the energy the world needs, but also to be a force for good in our host countries. As we emerge from the COVID-19 pandemic we find ourselves facing new challenges. Russia's invasion of Ukraine has shocked the world and had devastating consequences for millions of people. The conflict has reminded the world of the need to pursue the energy transition while simultaneously providing energy security. This challenge is exacerbated by inflation globally. Prices of essentials such as food, transportation and utilities are rising and many people around the world are feeling the pressure of higher living costs. At Kosmos, we remain committed to providing living-wages at our operations.

In 2022, we will look for further programs to mitigate human rights risks caused by challenging socio-economic conditions in our countries of operation. This is likely to go beyond the boundary of our operations into helping disadvantaged communities overcome the fall-out from the disruption to global markets, in particular food insecurity. As a responsible operator, and at a time of great difficulty, it is important that we continue to abide by our commitment to support the communities where we live and work.



**Andrew G. Inglis**  
Chairman of the  
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