

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 Energy is a leading deepwater exploration and production company focused on meeting the world’s growing demand for secure, affordable and cleaner energy.

We have a diversified portfolio of low cost, lower carbon assets – including oil production in Ghana, the U.S. Gulf of Mexico, and Equatorial Guinea, as well as world-class natural gas and LNG development projects offshore Mauritania and Senegal.

We work to supply the energy the world needs today, find and develop cleaner energy for the future, and be a force for good in our host countries.

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 engagement with project 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 wherever 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 have conducted 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 through which employees, contractors, and other stakeholders may raise concerns related to our operations. Our 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 based on engagement and dialogue).

Kosmos 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 third party suppliers, both international and local, 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. 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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2022 ACTIVITIES

The countries where we operate faced higher inflation and greater economic and social pressures in 2022, with some experiencing double digit inflation rates. If suppliers are put under pressure to meet unrealistic timelines or agree to unreasonable prices, this may increase the risk of modern slavery in the supply chain. In this challenging economic environment Kosmos has maintained our commitment to negotiate fair contract terms with our suppliers. Furthermore, Kosmos' Master Services Agreements 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.

In parallel, we strengthened internal guidance on implementing country-specific grievance mechanisms. This will facilitate alignment across the company while giving our teams the flexibility to tailor the reporting process to better meet the needs of local stakeholders. We encourage transparent communication between our business partners, contractors, and affected stakeholders and view our grievance mechanisms as a source for continued learning.

Kosmos provides annual training on ethical conduct to promote high standards of ethical behavior and compliance at every level of the company. All of our employees and contractors, including our Senior Leadership Team, participate in this training which, inter alia, covers when to use and how to access the [Whistleblower Hotline](#).

Throughout 2022 we remained attentive to the potential of the continuing 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 that any changes to working conditions as a result of the pandemic did not increase human rights risks in the workforce. We developed a protocol for our offshore operations to mitigate exposure to COVID-19 and protect our workforce. We were diligent about maintaining safety standards and took an active role managing contractor safety performance.

OUR FORWARD PLANS

At Kosmos our purpose is clear: we work to supply the energy the world needs today, find and develop cleaner energy to advance the energy transition, and be a force for good in our host countries. During the energy transition we recognize that companies and governments are pushing to accomplish more on accelerated timelines. Therefore in 2023 we will support our in-country teams as they strengthen their grievance mechanisms and we will continue to be vigilant in our engagement with project operators. We will look to enhance engagement with our suppliers to ensure there is a shared understanding and commitment to providing fair remuneration and working hours and safe working conditions. These efforts are enabled by the close relationships we maintain and the deep commitment of our employees to support the communities where we live and work.



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