

# Supplier Code of Conduct

**THIS SUPPLIER CODE OF CONDUCT OUTLINES THE MINIMUM EXPECTATIONS FOR KOSMOS' VENDORS, CONTRACTORS, AND SUPPLIERS (SUPPLIERS) IN RELATION TO HUMAN AND LABOR RIGHTS, HEALTH, SAFETY, AND ENVIRONMENT (HSE), AND BUSINESS ETHICS.**

Kosmos seeks to work with suppliers who adhere to the same standards of conduct that we observe in our daily operations. We strive to foster sustainable economic and social development by, whenever feasible, sourcing goods and services from vendors in our host countries. This code does not replace nor amend any legal requirements or the terms of any contracts between Kosmos and its suppliers.

## I. HUMAN AND LABOR RIGHTS

Kosmos requires suppliers to respect internationally recognized human rights, such as those set out in the United Nations (UN) Universal Declaration of Human Rights in a manner consistent with the UN Guiding Principles on Business and Human Rights, and adhere to local laws in the context of their local labor market. This includes:

- Upholding the principles outlined in the International Labour Organization (ILO) Fundamental Principles and Rights at Work including respecting freedom of association of workers, within the relevant national legal framework;
- Prohibiting the use of forced labor, trafficked labor, or child labor;
- Prohibiting harassment and abusive or inhumane treatment of workers;
- Providing equal opportunities and avoiding discrimination based on race, ethnicity, sexual orientation, gender expression, religion, national origin, or disability within the relevant national legal framework;

- Setting responsible expectations for maximum working hours, work conditions, and disciplinary actions in their own operations;
- Paying employees sufficiently at least, to meet their basic needs, in the context of their local labor market;
- Making reasonable best efforts to train and hire citizens of the country in which work is performed.

## II. HEALTH, SAFETY, AND ENVIRONMENT

Kosmos requires suppliers to place the highest importance on health, safety, and environment (HSE) at all times during the performance of work. Suppliers must comply with all applicable HSE laws and regulations. Kosmos expects suppliers to continually improve HSE performance to protect employees, contractors, local communities, and the environment. This includes:

- Seeking the avoidance of all health and safety incidents through the identification and control of risks;
- Using resources efficiently and responsibly to prevent or minimize adverse environmental impacts;
- Seeking opportunities to reduce carbon and other greenhouse gas (GHG) emissions related to work set forth in contracts;
- Minimizing waste generation and ensuring proper disposal of all waste.

### III. BUSINESS ETHICS

Kosmos expects suppliers to behave ethically and observe standards comparable to those set out in Kosmos' [Business Principles](#) and supporting policies in all dealings with employees, public authorities, and communities. This includes:

- Avoiding conflicts of interest that impair the ability to perform work objectively and effectively;
- Maintaining confidentiality of all proprietary information provided by Kosmos or developed during work.

Suppliers must comply with all applicable laws, sanctions, and regulations. This includes:

- Adhering to restrictions on exporting to specific countries, entities, or individuals under US sanctions and embargoes;
- Obtaining necessary licenses for any transfer of deliverables or related information;
- Ensuring all actions align with current US regulations;
- Complying with the United States Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act and any other applicable anti-corruption law;
- Refraining from misusing non-public information for insider trading or assisting others in such activities.

### IV. DUE DILIGENCE

Kosmos exercises risk-based due diligence in the selection of suppliers. We screen suppliers during the sourcing and onboarding process to ensure alignment with Kosmos' values and policies. 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.

We maintain a [Whistleblower Hotline](#) as a vehicle for employees, suppliers, third parties and others to report anonymously, without risk of retaliation, potential violations of any Kosmos policy. If you believe that any practice by Kosmos suppliers raises questions as to compliance with our policies or applicable laws, you can report it through the following website or numbers:

- [www.integritycounts.ca/org/kosmosenergy](http://www.integritycounts.ca/org/kosmosenergy)
- Toll Free Call: 1-866-921-6714 (United States), 0-800-092-3586 (UK)
- Ask the operator to place a collect call to Canada: 1-604-922-5953 (Equatorial Guinea, Ghana, Mauritania, Sao Tome and Principe, Senegal)

### V. FURTHER REFERENCES

For further information, please refer to the following:

- [Anti-Corruption Compliance Policy](#)
- [Business Principles](#)
- [Health, Safety and Environmental Management Policy](#)
- [Human Rights Policy](#)
- [Stakeholder Engagement and Community Development Policy](#)
- [Sustainability Report](#)
- [The STANDARD](#)



Kosmos Energy Ltd.  
c/o Kosmos Energy LLC  
8176 Park Lane, Suite 500  
Dallas, Texas 75231  
+1 214 445 9600

NYSE/LSE Symbol: KOS

[www.kosmosenergy.com](http://www.kosmosenergy.com)