



TALOS ENERGY CODE OF CONDUCT

2024
EFFECTIVE
DATE



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Our Values

THINK AS AN OWNER



We believe employees thrive when they develop a sense of ownership at work. Employees who think and act as if the business were their own are empowered and feel a great sense of pride in both the process and the outcome.

We are dedicated to fostering an entrepreneurial culture with a focus on cutting-edge engineering and technology combined with an unwavering commitment to ethical action and mutual respect.

EMBODY INTEGRITY & SAFETY



We are guided by a deep responsibility to conduct our business in a way that ensures safety, minimizes environmental impacts, positively influences our local communities and prioritizes ethics and good governance.

Our success is built upon a foundation of integrity, honesty and prioritization of safe workplace practices.

Our work is never so urgent or important that we cannot take time to do it safely and with integrity.

MAINTAIN OPTIONALITY



Maintaining optionality means keeping an open mind to new ideas about how we think and operate to better respond in a competitive and changing environment. Keeping our options open and remaining flexible allows Talos to deal with unexpected challenges in a rapid, decisive and successful way.

Talos is committed to being agile and forward-thinking in all business endeavors and practices. Being able to adapt includes developing a mindset geared toward pursuing growth and being open to new possibilities along the way.

EMPOWER EACH OTHER



Our employees are the reason we pursue our goals with passion, integrity, and success. Through open communication and mutual respect, we allow employees' decisions and technical expertise to drive performance and operational excellence.

We believe in promoting a team culture where employees collaborate and empower their teammates to reach the Company's goals. Empowerment is strengthened by authentic feedback, open conversations, hard work, and supporting one another through challenges.

EMBRACE DIVERSITY & INCLUSION



Talos fosters an inclusive culture where we recognize and respect diversity as the spectrum of human differences. We want our employees to feel connected and valued, and our inclusive culture creates a positive environment where employees feel comfortable sharing thoughts, ideas and opinions.

Embracing our diversity allows our varying backgrounds and experiences to create broader ideas, build a stronger team and achieve the best possible outcomes.

Our Expectations and Code

Do Business with Integrity

This Code of Business Conduct and Ethics guides our actions. Ethics, integrity and trustworthiness form the basis of Talos's business practices, and this Code details the expectations of our behavior. You, like each of Talos's directors, officers and employees, are personally responsible for reading and understanding this Code, thinking about the principles set out in this Code, and incorporating these principles into everything we do at Talos Energy Inc.

Comply with the Law, Comply with the Code

To maintain the Company's valuable reputation, we must comply with both the law and Talos's policies, standards and business practices. Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built, and compliance with all regulations and laws takes priority over the opportunity to profit or gain competitive advantage.

In the event this Code conflicts with the law, we will follow the law. In the event this Code conflicts with local custom or "how it's always been done", we will follow this Code. Talos holds training sessions to promote compliance with laws and Company policies, and you are expected to attend these information and training sessions.

Compliance with this Code is a condition of employment with Talos. This Code applies to every one of our employees and officers as well as our directors. Violations of this Code have consequences, and may result in disciplinary actions, up to and including termination of employment.



Our Expectations and Code (Continued)

Whistleblower Protections, and Retaliation

Talos is committed to maintaining an environment in which people feel free to report all suspected incidents of misconduct. No retaliatory action will be taken against any person who in good faith reports any conduct which he or she reasonably believes may violate this Code.

In addition, no retaliatory action will be taken against any individual who in good faith assists or participates in an investigation, proceeding, or hearing relating to a complaint, or who files, causes to be filed, testifies, or otherwise assists in such a proceeding. However, a person who files a report or provides evidence that he or she knows to be false or without a reasonable belief in the truth and accuracy of such information may be subject to disciplinary action, including termination of employment.

For the avoidance of doubt, nothing in this Code is to be interpreted or applied in any way that prohibits, restricts or interferes with an employee's exercise of rights provided under, or participation in, "whistleblower" programs of the U.S. Securities and Exchange Commission or any other applicable regulatory agency or governmental entity (each, a "Government Body"), good faith reporting of possible violations of applicable law to any Government Body, including cooperating with a Government Body in any governmental investigation regarding possible violations of applicable law, or right to engage in other legally protected communications.

Questions and Reporting

If you have any questions about this Code or any ethical issue that may arise, please contact your supervisor, manager, the Human Resources Department, or the Legal Department for assistance. You may also report ethics-related matters on a confidential basis through the Company Hotline at 844-283-9315 or www.reportlineweb.com/talosenergy.



Our People and Community

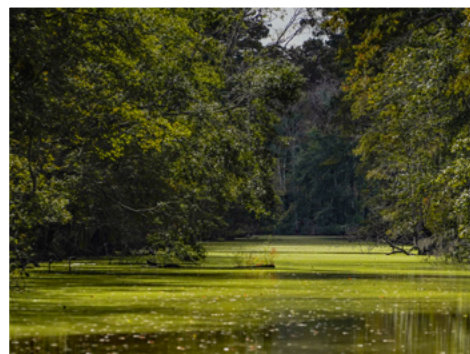
Safety and Environment

Foremost among our commitments to an ethical work environment is Talos's commitment to conducting its business in a manner that has due regard for the health and safety of human life and the environment. We will operate in compliance with applicable health, safety and environmental laws, rules and regulations. Employees have a responsibility to follow health and safety rules and report accidents, injuries and unsafe conditions.

You should be aware that health, safety and environmental laws may provide for significant civil and criminal penalties against individuals and/or the Company for the failure to comply with applicable requirements. Accordingly, you must comply with all safety and health laws, rules and regulations, including occupational safety and health standards, and all environmental laws, rules and regulations applicable to the Company or its business.

Sustainability

An unwavering commitment to safety, environmental responsibility, good governance and strong ethical standards is critical to our success as a company. We must maintain a constant focus on our environmental impact, the safety and well-being of our people, our corporate governance and our contributions to local communities.



Employment Practices and Work Environment Non-Discrimination

We value the diversity of our employees and are committed to providing an equal opportunity in all aspects of employment without regard to race, color, gender identity or expression, religion, age, national origin, citizenship status, military service or reserve or veteran status, sexual orientation or disability.

We will make decisions about hiring, salary, benefits, training opportunities, work assignments, advancement, discipline, termination and retirement solely on the basis of a person's ability to perform the tasks required by their position.

Behavior

Violence and threatening behavior are not permitted in the workplace. Employees should report to work in a condition to perform their duties, free from the influence of illegal drugs. The use of alcohol or unauthorized or illegal drugs while working will not be tolerated.

Freedom of Association

The Company recognizes and respects the right of employees to exercise their lawful rights of free association, including joining or electing not to join any association.

Our Company

Protecting Our Assets

Talos's assets are for use in Talos's business, and you are responsible for safeguarding them from loss, damage, theft, waste, fraud and misuse. Theft, carelessness and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. While occasional personal use of our technology assets is permitted, generally Company equipment should not be used for personal business. Your obligation to protect Talos's assets includes an obligation to protect the Company's proprietary information. Proprietary information includes intellectual property such as seismic data or information, well data, trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, geological prospects and interpretations, engineering, geological and geophysical ideas, designs, databases, records, salary information and any unpublished financial data and reports.

Confidentiality

In the course of your employment you will have access to information that is confidential. Confidential information may be in physical form (on paper, in an email, or on a computer network) or may be knowledge acquired through conversations to which you are a party or that you overhear. You must maintain the confidentiality of all non-public information of the Company as well as information entrusted to us by Talos or its partners, suppliers and customers (collectively, "confidential information"), except when disclosure is authorized.

Confidential information includes all non-public information that, if disclosed, might be of use to competitors, or harmful to the Company. The obligation to preserve confidential information continues even after your employment ends.



Our Company (Continued)

Corporate Opportunities

As employees of Talos, it is our obligation to seek business opportunities on Talos's behalf. You may not take personal advantage of opportunities in which the Company might be interested that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by the Chief Compliance Officer.

Insider Trading

Employees who have access to confidential information about Talos or its business activities are not permitted to use or share that information for purposes of trading in the Company's securities, or for any other purpose except the conduct of the Company's business. All non-public information about the Company or its business should be considered confidential information.

To use material non-public information for personal financial benefit or to "tip" others who might make an investment decision to buy or sell Company stock on the basis of this information is not only unethical but also illegal. For this reason, all employees must comply with the Company's Policy on Insider Trading.



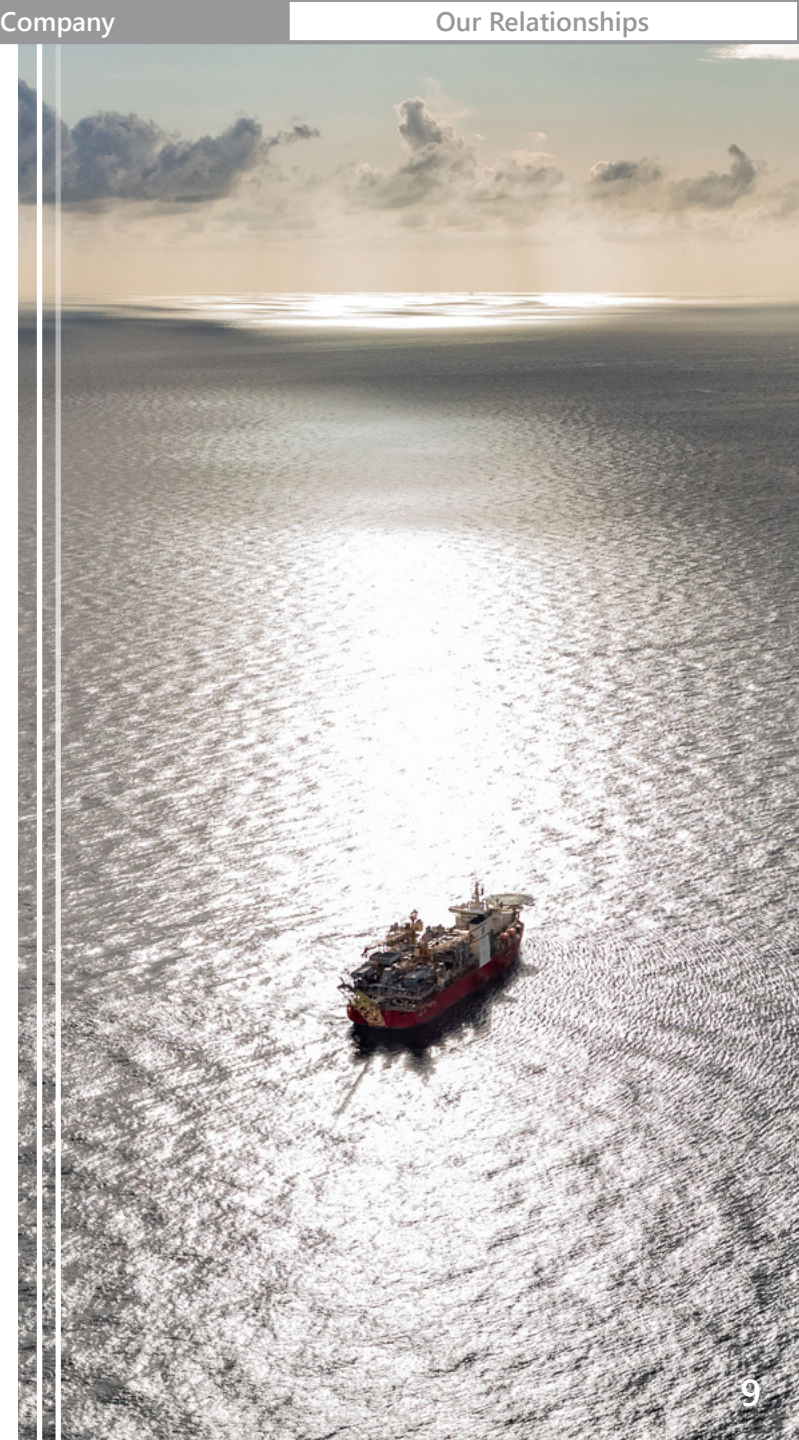
Our Company (Continued)

Anti-Money-Laundering

We should avoid business relationships with suppliers or vendors that may be engaged in money laundering. ‘Money laundering’ is the process by which people try to conceal the proceeds of illegal activities or try to make the source of illegal funds look legitimate. We should always ensure that we are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. Check for “red flags” such as requests from a supplier or vendor for cash payments or other suspicious payment terms.

Record-Keeping

Talos requires honest and accurate recording and reporting of information in order to make responsible business decisions and to comply with financial reporting regulations. As such, the Company’s books, records and accounts must accurately and fairly reflect the Company’s transactions in reasonable detail and in accordance with the Company’s accounting practices and policies. For example, no undisclosed, unrecorded or “off the books” funds or assets are permitted, no false or deliberately inaccurate entries (such as overbilling or advance billing) are permitted, no payment shall be made with the intention or understanding that all or any part of it is to be used for any person other than that described by the documents supporting the payment. Business records and communications often become public, and you should avoid exaggeration, derogatory remarks, or inappropriate characterizations of people and companies that can be misunderstood.



Our Relationships

Competing Fairly

Talos seeks to outperform its competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. We aim to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. In the course of the Company's business, you should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other practice involving unfair dealing.

Conflicts of Interest

At Talos, we believe in keeping our personal interests separate from Talos's interests. You should strive to avoid any activity or relationship that has the potential for, or the appearance of, interfering with your objective decision-making as a Talos employee. Whether an activity is an actual or perceived conflict of interest depends on several factors, such as value, frequency, business purpose, undue preference to a particular party, and whether the situation interferes or could appear to interfere with your independent judgment or objectivity in doing your job.

While it is not possible to describe all circumstances where a conflict of interest may exist, they typically arise in these situations:

- Accepting loans or guarantees of obligation from the Company by directors or officers.
- Soliciting or accepting gifts from someone who does business or seeks to do business with us.
- Soliciting of contributions to charity from someone who does or seeks to do business with the Company.
- Retaining the services of a company at which a family member is employed or has a financial relationship, or having an ownership interest in an entity that does or seeks to do business with Talos.

A conflict of interest could exist even where both the Company and the individual benefit. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. The best policy is to avoid any direct or indirect business connection with the Company's customers, suppliers or competitors, except on the Company's behalf.



Our Relationships (Continued)

Disclosing a Potential Conflict of Interest

If you become aware of a potential conflict of interest you should disclose it immediately to the Chief Compliance Officer.

Business Entertainment and Gifts

The exchange of gifts and entertainment can build goodwill in business relationships, but some gifts and entertainment can create improper influence (or the appearance of improper influence). No gift or entertainment should ever be offered, given, provided, solicited or accepted unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, whether individually or when aggregated with other gifts or entertainment received, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations. We are required to comply with the Company's Gifts and Hospitality Policy, and with the Company's Anti-Corruption Policy, which provides additional guidance concerning dealings with governmental officials.

Bribery/Corruption

Illegal payments to government officials of any country are strictly prohibited. The U.S. Foreign Corrupt Practices Act (the "FCPA") prohibits giving, making, offering, promising or authorizing the payment or transfer of anything of value, directly or indirectly, to a Foreign Official to obtain or retain business improperly. The term Foreign Official is broadly construed and may include any officer, employee, or other person acting on behalf of a non-U.S. government or any department, agency, or instrumentality thereof; any international organization (such as the Red Cross or World Bank); any government-owned, -operated, or -controlled entity, such as a state-owned energy company or public utility; and any non-U.S. political party or their officials, and any candidates for non-U.S. political office. The FCPA also requires the Company to maintain certain accounting procedures and internal controls.

The Company has implemented an FCPA Policy that provides further guidance regarding compliance with the FCPA. In addition, the U.S. government has a number of laws and regulations regarding business gratuities that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules.

Respecting Sanctions and Trade Embargoes

The United States government uses economic sanctions and trade embargoes to further various foreign policy and national security objectives. You must abide by all economic sanctions or trade embargoes that the United States has adopted, whether they apply to foreign countries, political organizations or particular foreign individuals and entities.

International Operations

When conducting business in other countries, it is imperative that you be familiar with, and strictly adhere to, all applicable foreign and domestic laws and regulations that apply to foreign operations, including the Foreign Corrupt Practices Act and similar anti-corruption laws. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the United States.



**TALOS ENERGY
EMPLOYEE CODE
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