



COMPLIANCE POLICY MANUAL

Human Rights Policy

[Adopted October 15, 2021]

HUMAN RIGHTS POLICY

Respect for Human Rights

Respect for human rights is a fundamental value of Talos Energy Inc. (“Talos” or the “Company”). We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers and independent contractors, among our many stakeholders. Our aim is to help ensure human rights within the communities in which we operate.

This policy applies to the Company, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage, regardless of the geographical area. The Company also expects its vendors, partners and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

Where adverse human rights impacts resulting from or caused by our business activities are identified, we are committed to provide for or cooperate in their fair and equitable remediation. The Human Rights Policy is overseen by the Company’s Board of Directors, including the Chief Executive Officer.

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and do not tolerate discrimination or harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace.

Freedom of Association and Collective Bargaining

We respect our employees’ right to join, form or not to join all types of associations, including political, religious, recreational associations or labor union without fear of reprisal, discrimination, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue and bargaining in good faith with their freely chosen representatives, and respect the employees’ right to strike in accordance with law.

Freedom of Religion, Opinion and Assembly

We respect our employees’ right to choose, practice and observe their chosen religion or belief, including the right to worship and observe rituals. We further respect our employees’ right

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to hold opinions free from outside influence and to assemble for the exchange of ideas. However, individuals are prohibited from advocating racial, religious or national hatred that amounts to an incitement to discrimination, hostility or violence.

Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

Guidance and Reporting for Employees

We strive to create workplaces in which open and honest communications among all employees are valued and respected. The Company is committed to comply with applicable labor and employment laws wherever we operate. The Company also ensures employees are aware of the Human Rights Policy through an annual distribution and certification process.

Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this

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policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with management, Human Resources, or the Legal Department.

Employees can also report suspected policy violations through the Ethics Line secured internet website www.reportlineweb.com/talosenergy or by calling 800-681-9287. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

The Human Rights Policy is aligned with the Company's Code of Business Conduct.

This policy can be found via the Company's internet site: <http://www.talosenergy.com>