



*Mike Anderson*  
*Senior Vice President, External Affairs,*  
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February 19, 2020

**By E-Mail:**

Vanessa A. Countryman  
Secretary, Securities and Exchange Commission  
100 F Street NE, Washington, DC 20549-1090

**Re:** Proposed Rule: Disclosure of Payments by Resource Extraction Issuer, Release No. 34-87783; File No. S7-24-19

Dear Secretary Countryman:

In light of the Securities and Exchange Commission's (SEC's) work to develop a rule for implementation of Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, we would like to refer you to Kosmos Energy's long-held position on transparency around payments to governments in the extractive industries.

Kosmos Energy is an oil and gas exploration and production firm listed on the New York and London Stock Exchanges. We believe resource revenues are more likely to be managed in the best interests of a country if payments and receipts are made transparently, and if accountability measures are in place for the use of these revenues. Ideally, this process is underpinned by a national dialogue in which industry plays its part as a partner with government and civil society. Kosmos is committed to advocating for transparency in our dealings with host governments.

Kosmos is also a Supporting Company of the Extractive Industries Transparency Initiative (EITI), a leading global standard that strengthens governance by promoting transparency and accountability in the oil, gas, and mining industries. We are committed to meeting or exceeding EITI requirements and have resolved to report and publish annually material payments to governments.

In 2014, prior to our London listing, we made a policy decision to disclose payments to governments at the project level as defined in the European Union Accounting Directive. We believe that this type of disclosure is beneficial to investors, civil society, and local communities, and reflects evolving international expectations.

We therefore support the EITI Standard's definition of project-level reporting. In addition, now that we have a secondary listing in London, and therefore reporting obligations in both the US and the UK, it would be helpful and more cost-efficient if there was substantial international alignment on this definition and on payments-to-government reporting requirements more broadly.

We believe our approach to transparency helps us to manage social and political issues, establishing Kosmos as a partner of choice and mitigating barriers to growth. We are also encouraged that civil society is committed to using payments to governments data constructively – an essential element in ensuring that transparency policies achieve the aim of strong resource governance.

For more information, please refer to page 11 of our [2018 Corporate Responsibility Report](#). Our disclosures can also be found on our website using this link: <https://www.kosmosenergy.com/transparency/>.

If you have any questions, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mike Anderson', with a stylized flourish at the end.

Mike Anderson