



**2022  
MODERN  
SLAVERY  
STATEMENT**

TRAFIGURA PTE. LTD. AND  
TRAFIGURA ASIA TRADING PTE. LTD.

# Scope and disclosure notes

This Modern Slavery Statement (Statement) is a joint statement made by Trafigura Pte. Ltd (TPTE) and Trafigura Asia Trading Pte. Ltd (TAT) (together, the Reporting Entities) for the purposes of the Australian Modern Slavery Act 2018 (Australian MSA) and United Kingdom Modern Slavery Act 2015 (UK MSA) for the financial year 1 October 2021 to 30 September 2022 (the reporting period).

TPTE is a wholly owned subsidiary of Trafigura Group Pte. Ltd (which is not itself a reporting entity under the Australian MSA or UK MSA) and TAT is a wholly owned subsidiary of TPTE. In this Statement, the collective expressions 'Trafigura', 'Trafigura Group' and 'the Group': (i) are used for convenience where reference is made in general to Trafigura Group Pte. Ltd. and its owned or controlled entities as a group; and (ii) shall not include (a) Nyrstar which is making its own statement for the purposes of the Australian MSA and is not a reporting entity under the UK MSA, or (b) Puma Energy, which is making its own statement for the purposes of the Australian MSA and UK MSA. The words 'we', 'us' and 'our' are used to refer to TAT, TPTE and TPTE's owned or controlled entities, excluding Nyrstar.

This Statement was approved by the Board of TPTE on behalf of both itself and TAT<sup>2</sup> on 31 March, 2023 and has been signed by Tan Chin Hwee (Chen Jinghui), Director of TPTE on 31 March, 2023 (see page 21).

## Consultation with owned and/or controlled entities

In preparing this Statement, we have consulted with functions within, or centralised Group functions which support, the Reporting Entities and owned or controlled entities, namely Social Responsibility, Health, Safety, Environment and Community (HSEC), Compliance and Legal. This was carried out through discussions relating to modern slavery risks, implementation of relevant Trafigura policies and processes within the Reporting Entities, as well as by means of direct input into this document.

Accordingly, our consultation with the individuals within these functions constituted consultation with each of the Reporting Entities and owned or controlled entities.

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1. In relation to the risk assessment and responsive actions of Nyrstar, refer to its statement lodged pursuant to the Australian MSA.

2. In its capacity as TAT's parent entity.

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This document accompanies Trafigura's 2022 Human Rights Report and 2022 Sustainability Report. Please visit [www.trafigura.com/2022SR](http://www.trafigura.com/2022SR) and [www.trafigura.com/sustainability](http://www.trafigura.com/sustainability)



[www.trafigura.com/2022SR](http://www.trafigura.com/2022SR)



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# Our human rights commitment

We recognise that our activities can impact, both positively and negatively, on people and the environment. We are committed to acting responsibly.

Respect for human rights is an important factor in supporting our ability to earn and maintain a social licence to operate. Taking action to address modern slavery risks also aligns with our objective to respect internationally recognised human rights in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

We seek to understand the actual and potential human rights impacts of our activities and business relationships. We endeavour to avoid causing or contributing to adverse human rights impacts through our activities and to address such impacts when they occur. Where we are able, we also seek to prevent or mitigate adverse human rights impacts that we are directly linked to through our operations, products or services by our business relationships.

In addition, where appropriate we provide grievance mechanisms for people whose human rights may be adversely impacted by our activities and business relationships.

Modern slavery is an umbrella term used to describe a range of serious exploitive practices, including servitude, forced labour, debt bondage and the worst forms of child labour. These exploitive practices involve grave breaches of human rights and can have long lasting consequences for survivors and their families and communities.

# Structure, operations and supply chains

The Trafigura Group is an independent, employee-owned physical trading and logistics business. The Group supplies commodities that are essential to the daily lives of people around the world, connecting producers and consumers reliably, efficiently and responsibly.

As one of the world's largest independent trading firms, the Trafigura Group employs over 13,746<sup>3</sup> people across 156 countries. The Group supports its trading activities through its industrial assets and activities around the world, including through its extensive network of international shipping and logistic operations.

## Trafigura Group business model

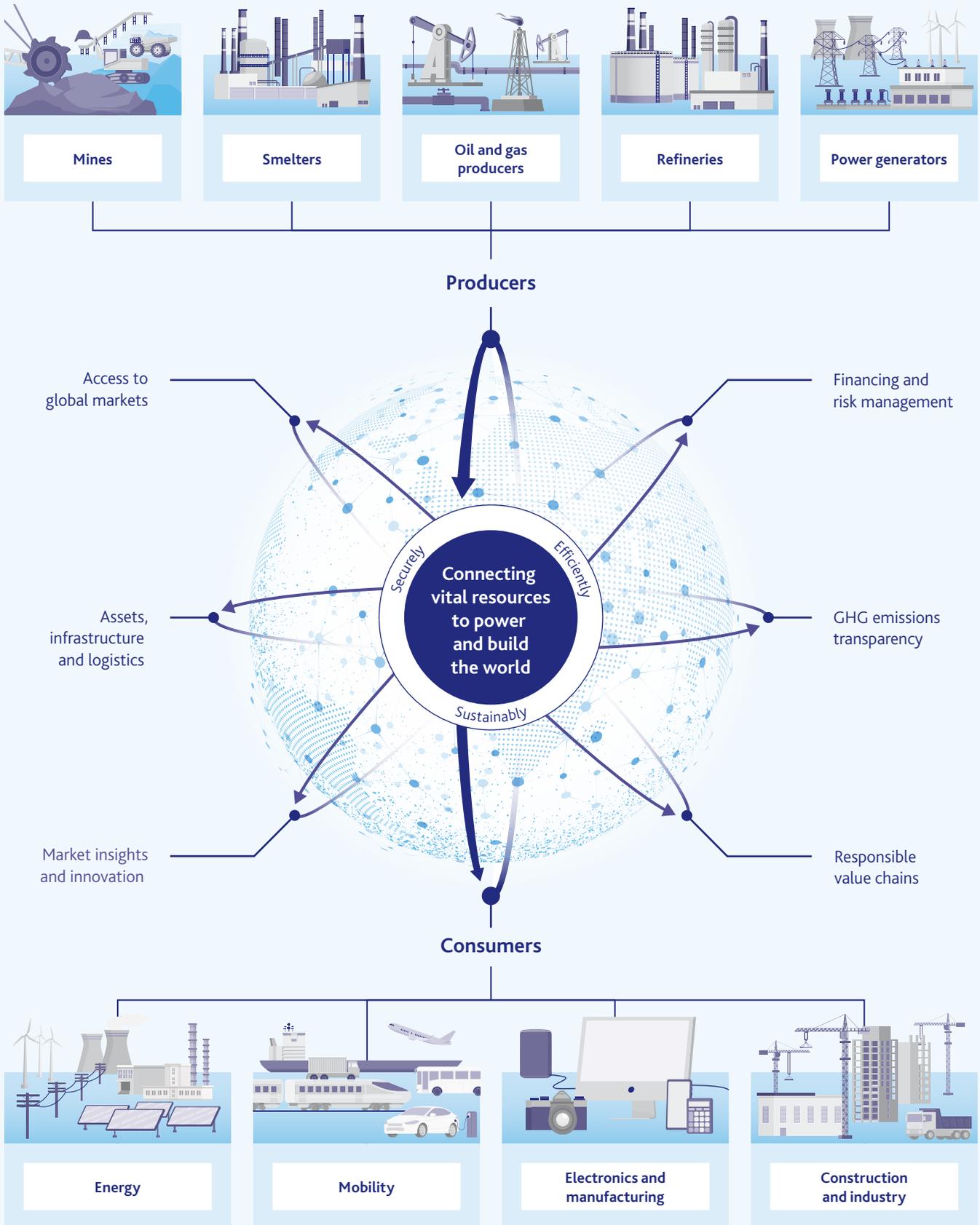
At the heart of global supply, Trafigura connects vital resources to power and build the world.

Across its global network, Trafigura deploys infrastructure, logistics and financing to connect producers and consumers, bringing greater transparency and trust to complex supply chains.

<sup>3</sup> Total employee numbers are calculated as an average over the financial year and include assets where Trafigura retains joint or sole management control, and for the first time in FY2022, Puma Energy.



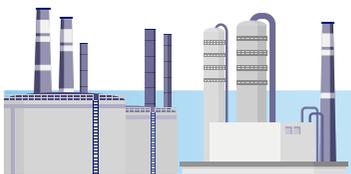
### Trafigura's business model



## Responsibly connecting the world's resources

As a leading participant of the global commodities industry, the scale and breadth of its business means that Trafigura interacts with a multitude of counterparties and stakeholders throughout the value chain.

Trafigura's business is centred around the following three core areas of activity:



### Managing commodity supply chains

Trafigura's core business is sourcing and supplying commodities, including non-ferrous metal concentrates and refined metals, bulk commodities, oil and petroleum products and power to customers globally. Trafigura manages complex supply chains and logistics efficiently and responsibly to connect producers and consumers while providing the commodities required for access to energy, mobility, industrial production and daily life.



### Owning and operating assets

Trafigura owns and operates or invests in mines, ports, terminals, storage facilities, smelters and refineries, renewable power generation and battery energy storage facilities, directly, through joint ventures or as a minority investor.

Trafigura also owns, operates and leases a fleet of tankers, bulk, container and gas carrier vessels that are essential to the global supply of commodities as an efficient means of transportation over long distances.



### Engaging with stakeholders

Trafigura has an important role in the global commodities industry and it collaborates with other value chain actors in order to promote sustainable growth.

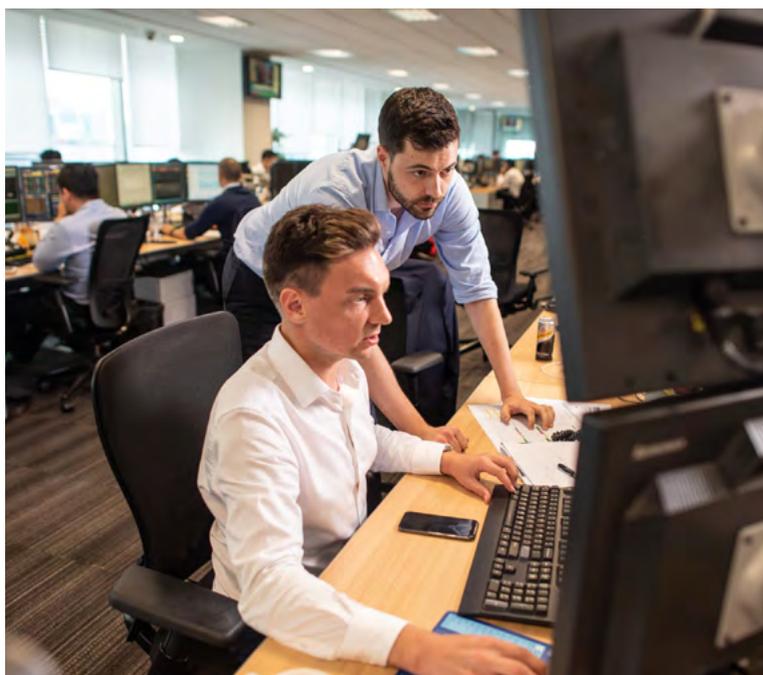
Trafigura works with governments, regulators, non-profit and charitable organisations, financial institutions, industry bodies and other companies.

## Structure and operations

The Trafigura Group includes a diverse range of global entities. TPTE is one of the Trafigura Group's international commodities trading companies. It is headquartered in Singapore and directly employs around 2,723 people across 45 offices located in 30 countries, all of whom are permanent and in professional roles. As a trading entity, TPTE's operations focus on sourcing, transforming and delivering physical commodities at all stages of the supply chain, including oil and petroleum products, and metals and minerals. TPTE also trades power.

TPTE owns or controls a range of other entities, located in and operating across a range of countries, which support, or own assets relevant to, its commodities trading business. These include:

- **Oil terminals:**  
entities which own and/or operate oil terminals, which support the storage and global transportation of oil products.
- **Mining:**  
an entity which owns and/or manages a mine.
- **Shipping and bunkering:**  
entities which own and operate vessels and charter vessels used to support Trafigura's trading activities as well as entities specialised in ship-to-ship refueling. Such owned vessels can also be chartered to third parties.
- **Services:**  
entities which provide services to TPTE such as treasury support, IT maintenance, cash and financing management, accounting and personnel hiring.



In addition to its owned or controlled entities, TPTE also has a number of investments and joint ventures, including in the following industries:

- Oil production, storage, distribution and refining;
- Port operations;
- Shipping and bunkering;
- Mining, extractives and smelting;
- Warehousing and storage services;
- Renewables.

TPTE's owned or controlled entities and its investments and joint ventures operate in a number of locations around the world with varying inherent modern slavery risks from low to high.

TAT is also engaged in the international trading of commodities. It is incorporated in Singapore. It does not have any direct employees. TAT's operations focus on sourcing and delivering physical commodities, including oil and petroleum products, and metals and minerals. TAT does not own or control any other entities or have investments or joint ventures.

## Supply chains

The data below shows the percentage of the Reporting Entities' combined procurement spend by region, as well as the top five countries in which our procurement spend is the greatest in each region. This reflects the location of our tier 1 suppliers although we acknowledge that the goods and services procured from our tier 1 suppliers may have different source countries or may have been delivered into different countries.



Due to the trading-focused nature of our business, the Reporting Entities have extensive global supply chains.

The main types of goods and services the Reporting Entities procure as part of their commodity trading activities include:

- Sourcing of physical commodities, such as oil and petroleum products and metals and minerals from around the world, including from oil and gas producers, mining companies, smelters and refineries, and other trading partners.
- Logistics, shipping and other chartering services to transport and deliver commodities, including ships and barges.

As part of its commodity trading activities, TPTE also procures services to support the storage and transformation of commodities, such as land or floating storage for petroleum products.

In some cases, goods and services may be procured from other entities within the Trafigura Group, for example, Trafigura Maritime Logistics Pte. Ltd provides shipping and freight services to commodity trading teams.

TPTE also procures goods and services to support its offices. These include travel and hospitality related services, IT equipment, labour hire, property leasing, cleaning and security services, professional services and office supplies.

# Identifying modern slavery risks

The activities of TPTE, its owned or controlled entities and TAT are technically complex and geographically dispersed. We recognise that, given the nature and extent of our global activities and the commodities we trade, there are risks of modern slavery in our value chain. We have policies and processes in place to assess and address these risks.

## Mapping risks

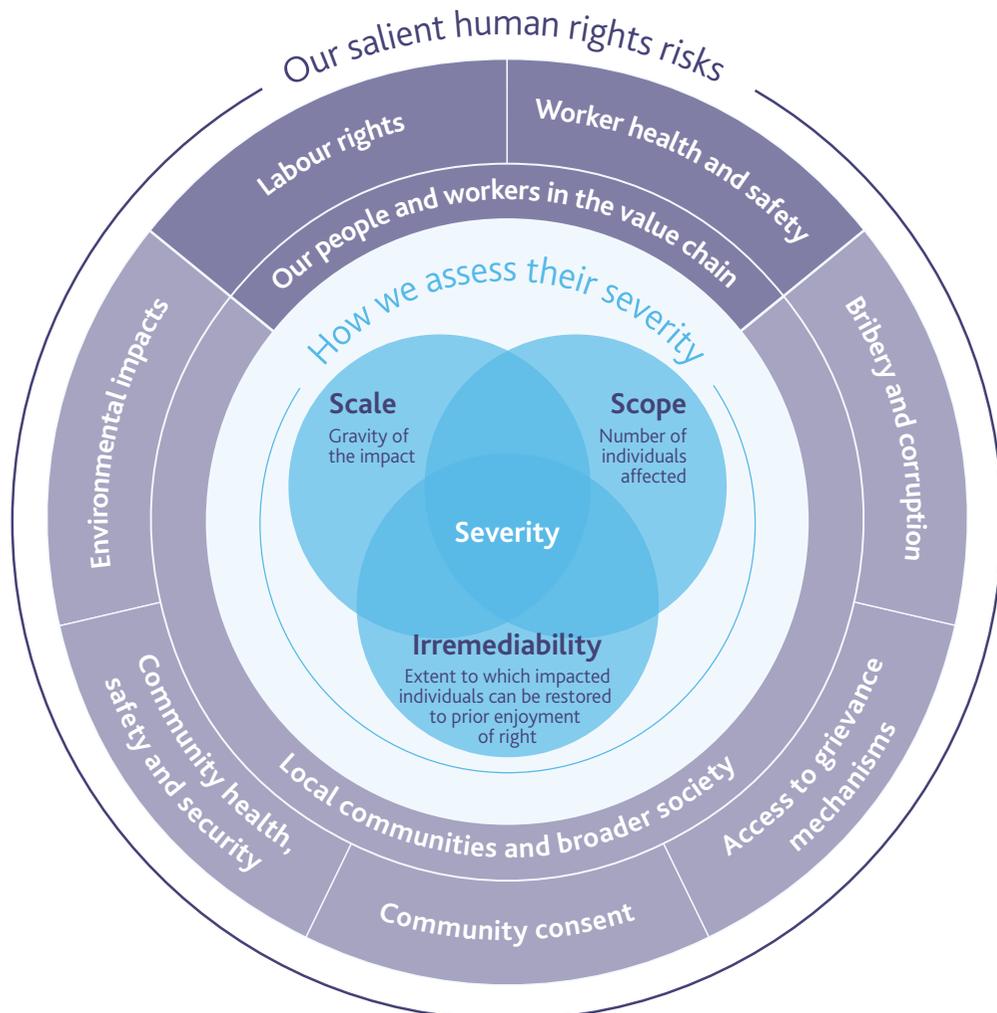
<sup>4</sup> Trafigura plans to release its 2022 Human Rights Report in April, 2023.

<sup>5</sup> The review process did not incorporate the activities and impacts of Puma Energy, since the re-consolidation of the Puma Energy entities into the Trafigura Group took place on 30 September 2022.

In FY2021, the Trafigura Group engaged an expert third party to identify salient human rights risks – those human rights at risk of the most severe negative impact through its activities and business relationships. The process, which is elaborated within Trafigura Group's 2022 Human Rights Report<sup>4</sup>, involved identifying, at a high level, the Group's actual and potential human rights impacts, including those relevant to the Reporting Entities and owned or controlled entities<sup>5</sup>. Salient human rights risks as identified through this process are shown in the infographic below.

The Trafigura Group has identified the labour rights of employees and people in its value chain, which includes freedom from all forms of modern slavery such as forced and child labour, as one of its salient human rights risks. This means it is being prioritised in our human rights risk management approach. Key actions to manage this and other salient human rights risks across the Group are set out in Trafigura Group's 2022 Human Rights Report.

2022 Trafigura  
Human Rights Report:  
[www.trafigura.com/2022SR](http://www.trafigura.com/2022SR)



## Modern slavery risk areas

### UNGPs' continuum of involvement

We use the UNGPs' continuum of involvement to understand our risk of involvement in adverse human rights, including modern slavery, impacts across our operations and supply chains. Our approach to managing human rights impacts is set out in Trafigura Group's 2022 Human Rights Report.

This section outlines six modern slavery risk areas in the operations and supply chains of TPTE, its owned or controlled entities and TAT<sup>6</sup>. The policies and processes in place to mitigate these risks are described in the next section.

We recognise that businesses' modern slavery risk profiles can be shaped by risk factors relating to geography, particular products and sectors and specific entities. Trafigura has

identified the six modern slavery risk areas through an industry-based assessment, which was supported by external experts and considered known geographic, product and sector risks.

We understand that modern slavery risk areas in our operations and supply chains may change over time and that each of our suppliers and other business partners have their own value chain, over which we have limited visibility, which may link us to modern slavery. We acknowledge that the COVID-19 pandemic heightened modern slavery risks for vulnerable workers and other rights holders in global supply chains, including in the shipping industry, raw material supply chains and other sectors involved in supporting commodity trading.

<sup>6</sup> Although Trafigura Group's assessment related to the entire group, we consider that these findings are accurate for general types of modern slavery risk for TPTE, its owned or controlled entities and TAT. This section aims to outline the general types of modern slavery risks that may be present in the operations and supply chains of TPTE, its owned or controlled entities and TAT. In line with the Australian Government Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities ([www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf](http://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf)), it does not exhaustively list all of our specific modern slavery risks.

<sup>7</sup> Please refer to the Modern Slavery Statement of Nyrstar in relation to its risk assessment.

## Risk areas<sup>7</sup>

Trafigura is committed to reviewing and, where necessary, updating its modern slavery risk analysis and corresponding risk mitigation plans.

### Operations

#### Recruiting workers in sectors with high modern slavery risks:

TPTE and its owned or controlled entities employ staff in a range of countries and in diverse roles. Overall, we believe there is a low risk that employees may be exploited in situations of modern slavery due to our employment controls and processes, as well as the majority of employees being in professional roles. However, we recognise that some jurisdictions and/or sectors in which TPTE and its owned or controlled entities operate, such as mining, shipping, logistics and port handling, may involve modern slavery risks relating to the recruitment of workers. These risks may also be heightened by periods of high demand for short-term and lower-skilled labour, and we recognise that the use of temporary labour in sectors such as mining and shipping can involve particular modern slavery risks. We also recognise that poor recruitment practices may contribute to the areas of modern slavery risk in supply chains as outlined below.

#### Investing in joint venture activities or other investments involved in modern slavery:

TPTE engages in a range of joint venture activities and investments in diverse sectors, including mining, oil and petroleum, metals and minerals storage and logistics. These joint venture activities and investments can involve entities that operate in and source from a diverse range of countries, including regions where there may be poor rule of law, current or past conflicts, and limited protection of labour and other human rights. Some of these jurisdictions have been the subject of adverse reports and findings in relation to modern slavery. We recognise that these sectors can involve a range of modern slavery risks, such as recruitment and use of exploited workers including risks of forced labour. TPTE also holds interests in entities involved in fund management and investments, which in turn have investments in entities in various sectors with a range of modern slavery risks.

2022 Trafigura  
Human  
Rights Report:  
[www.trafigura.com/2022SR](http://www.trafigura.com/2022SR)

<sup>8</sup>Please refer to the Modern Slavery Statement of Nyrstar in relation to its risk assessment.

2022 Trafigura  
Human  
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## Risk areas<sup>8</sup>

Trafigura is committed to reviewing and, where necessary, updating its modern slavery risk analysis and corresponding risk mitigation plans.

### Supply chains

#### **Sourcing commodities as part of trading activities that may be produced using modern slavery:**

The Reporting Entities source large quantities of primary products. The two main categories of commodities traded are oil and petroleum products, and metals and minerals. The production of these commodities takes place in a diverse range of countries, including regions where there may be poor rule of law, current or past conflicts, and limited protection of labour and other human rights. Some of these jurisdictions have been the subject of adverse reports and findings in relation to modern slavery. The supply chains for these commodities are also often complex and it can be difficult to accurately track commodities to their source, including in situations where commodities have been traded, refined or blended.

#### **Storing, blending, refining or delivering commodities using services involving modern slavery:**

The Reporting Entities and owned or controlled entities procure a range of services, typically performed by third parties, to facilitate the storage, blending and refining of commodities. Storage, blending and refining of products can take place in a diverse range of countries, including regions where there may be poor rule of law, current or past conflicts, and limited protection of labour and other human rights. The Reporting Entities also procure services performed by third parties to facilitate the delivery of commodities. The transport and delivery of commodities by ship, road or rail throughout the value chain may involve workers at risk of exploitation. This includes the transport and delivery of commodities by suppliers to the Reporting Entities, as well as the transport and delivery of commodities from the Reporting Entities to customers. We have identified seafarers' rights as a particular area of risk and have taken steps to better understand this risk (for further details, see our 2021 Modern Slavery Statement at [www.trafigura.com/media/3381/2021\\_trafigura\\_modern\\_slavery\\_act-statement.pdf](http://www.trafigura.com/media/3381/2021_trafigura_modern_slavery_act-statement.pdf)).

#### **Procuring services and products to support the operations of non-trading entities:**

TPTE owns or controls a number of non-trading entities which operate in a range of sectors, including mining and extractives, smelting, oil exploration, oil terminals and ports, and shipping and bunkering. These entities procure a diverse range of products and services to support their operations, including: maintenance and construction products and services; security and facilities management services, such as catering and cleaning; personal protective equipment and uniforms; logistics and delivery services; and vehicles and machinery. We also use labour hire agencies including for shipping crews and at assets such as mines. These products and services may involve modern slavery risks relating to the use of temporary and lower-skilled workers and can involve complex and fast-moving global supply chains.

#### **Procuring office products and services provided or produced using modern slavery:**

TPTE and its owned or controlled entities procure a variety of products and services to manage and maintain offices in various locations around the world. This includes the procurement of facilities and associated services such as cleaning, maintenance, catering and security, which can involve high levels of subcontracting and the use of short term and lower-skilled workers. This also includes procurement of various electronics (including IT hardware and software), uniforms, personal protective equipment, and other products, which can involve complex and fast-moving global supply chains.

# Actions to assess and address modern slavery risks

We take a range of actions to assess and address the modern slavery risks in our operations and our supply chains.

Our ability to address modern slavery risks is shaped by the nature of our business relationships across our operations and supply chains. Where we identify relevant risks that we are directly linked to through a business partner, for example, as part of our responsible sourcing due diligence process, we consider how we can use our influence to encourage them to respect human rights. The actions we have taken are varied, including structuring agreements to include provision for mandatory assessments, not renewing trading agreements and exiting a relationship ahead of the expiry of a contract.

## Governance

All entities within the Trafigura Group, including the Reporting Entities, are required to implement policies and standards that are established at a Group level. Entities within the Group adopt and implement policies and standards to mitigate ESG risks, including those relevant to modern slavery, relevant to specific operational contexts.

The Social Responsibility function has day-to-day responsibility for overseeing Trafigura's human rights approach as part of Trafigura's Corporate Affairs and Sustainability team, including in relation to modern slavery. Social Responsibility works with other key functions including Human Resources, Compliance, Health, Safety, Security and Environment to embed our human rights approach across the business including by developing and supporting implementation of human rights commitments, supporting due diligence activities and developing training.

The ESG Committee is one of Trafigura's Board sub-Committees. It oversees and monitors strategy for human rights including modern slavery risk management which is supported by the Commercial ESG Steering Committee. The Commercial ESG Steering Committee is led by a member of the management committee to enhance senior management oversight and engagement on ESG matters (including modern slavery risks).



### Policies and guidelines

During the reporting period, we continued to have a number of policies and guidelines in place that define how we do business. The policies and guidelines that are most relevant to the management of our human rights impacts, including modern slavery risks, are summarised below.

All policies and guidelines are made available to staff through Trafigura’s intranet and, where applicable, are supported by e-learning tools, explanatory videos and animations to promote uptake and familiarisation.

Many of these policies and guidelines are also available on Trafigura’s website and are increasingly referenced within the Reporting Entities’ commercial agreements, particularly where they are procuring goods from suppliers in high-risk areas or services from contractors engaged in high-risk activities.

Such policies are increasingly discussed at the start of the Reporting Entities’ commercial relationships and are often latterly referenced within commercial agreements where the Reporting Entities seek to impress upon suppliers the need, for instance, to commit to:

- Maintain all licenses, permits, authorisations and registrations required to be held under applicable laws;
- Acknowledge that Trafigura supports the UNGPs, recognises internationally agreed human rights, including labour rights and abides by certain policies, such as those listed below;
- Support Trafigura’s diligence efforts, including site assessments, as appropriate.

Policy/Guideline	Target audience	Overview
<p><b>Code of Business Conduct</b>  <a href="http://www.trafigura.com/brochure/trafigura-code-of-business-conduct">www.trafigura.com/brochure/trafigura-code-of-business-conduct</a></p>	 <b>Employees</b>	<p>Sets out behavioural and integrity expectations for Trafigura’s people and businesses. This includes expectations in relation to anti-bribery and corruption and more generally relating to acting within the law and in an ethical manner.</p>
		
<p><b>Corporate Responsibility Policy</b>  <a href="http://www.trafigura.com/media/1896/2016/trafigura_corporate_responsibility_policy_english.pdf">www.trafigura.com/media/1896/2016/trafigura_corporate_responsibility_policy_english.pdf</a></p>	 <b>Employees</b>	<p>Sets out the Board’s high-level priorities and commitments with respect to acting responsibly. This includes an aim to avoid causing or contributing to adverse human rights impacts through our activities, to seek to address such impacts when they occur, and to seek to mitigate adverse social and environmental impacts directly linked to our operations or services.</p>
		
<p><b>Business Principles</b>  <a href="http://www.trafigura.com/brochure/trafigura-hsec-business-principles">www.trafigura.com/brochure/trafigura-hsec-business-principles</a></p>	 <b>Employees and commercial relationships</b>	<p>Sets out the Board’s expectations of the Group and its divisions and operating companies in relation to corporate responsibility. They recognise our responsibility to: respect the rights of people involved in our operations; comply with relevant labour law and regulations; respect internationally recognised human rights; and engage constructively with relevant stakeholders.</p> <p>Each company within the Trafigura Group is expected to supplement the Business Principles and HSEC Management System Framework with relevant and adequate sector-specific standards and supporting policies and procedures for their day-to-day operations.</p>
		



Policy/Guideline	Target audience	Overview
<p><b>Trafigura Contractor HSEC Code of Conduct</b></p> <p><a href="http://www.trafigura.com/brochure/trafigura-contractor-hsec-code-of-conduct">www.trafigura.com/brochure/trafigura-contractor-hsec-code-of-conduct</a></p>	 <b>Contractors</b>	<p>Sets out expectations of contractors including that they should respect labour rights and the human rights of their workers, sub-contractors, local communities and others affected by their business operations in line with applicable laws and regulations and international human rights standards.</p>
<p><b>Metals and Minerals: Responsible Sourcing and Supply Chain Expectations</b></p> <p><a href="http://www.trafigura.com/brochure/responsible-sourcing-and-supply-chain-expectations">www.trafigura.com/brochure/responsible-sourcing-and-supply-chain-expectations</a></p>	 <b>Suppliers</b>	<p>Sets out expectations for suppliers including that they should not profit from, contribute to, assist with or facilitate the commission of serious human rights abuses, including forced or compulsory labour, the worst forms of child labour and other gross human rights violations. The Expectations also outline our approaches to supply chain due diligence and supplier engagement.</p>
<p><b>Global Grievance Mechanism Guidelines</b></p>	 <b>Employees and external stakeholders</b>	<p>Describes how Trafigura promotes the prompt, transparent and anonymous escalation and corresponding mitigation of issues and concerns from a wide range of internal and external stakeholders via its online grievance management system, EthicsPoint.</p>
<p><b>Operation Level Guidance for the Handling of Complaints and Grievances</b></p>	 <b>Employees</b>	<p>Outlines the key criteria and process steps to be considered when designing and implementing a community-level mechanism for the receipt, handling and management of issues raised by local communities and other external parties.</p>

2022 Trafigura Sustainability Report  
[www.trafigura.com/2022SR](http://www.trafigura.com/2022SR)

### Our due diligence processes

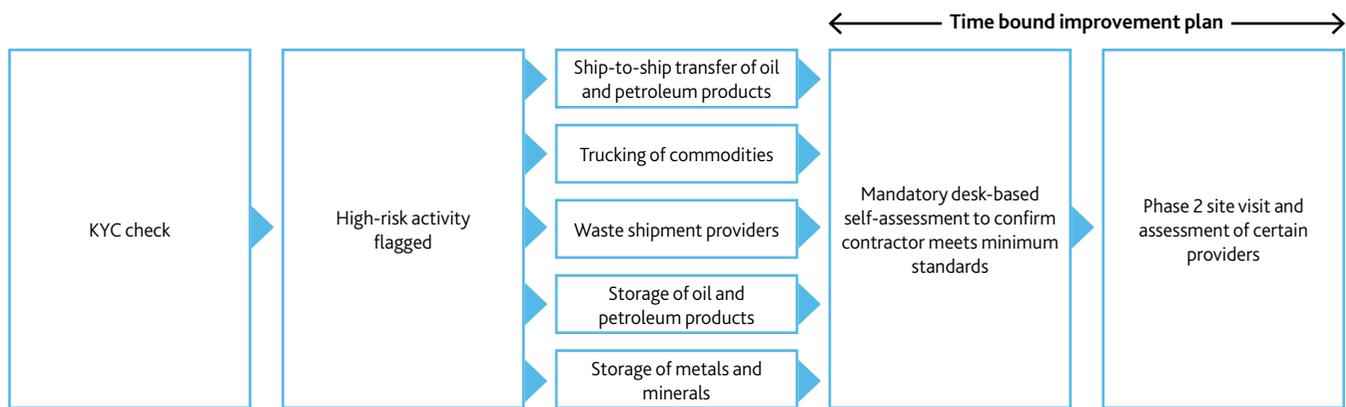
We have three key due diligence processes that relate to our counterparties, including contractors.

These processes focus on identifying and prioritising those activities in our supply chains where risks to people and the environment are greatest. Further details are set out in Trafigura’s 2022 Sustainability Report.

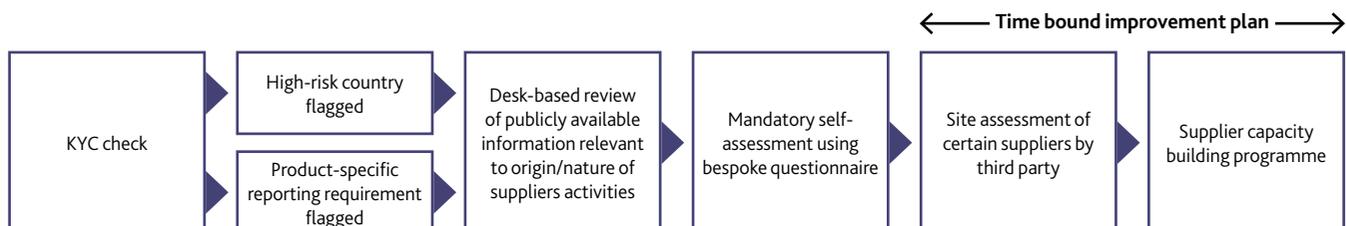
- **Know Your Counterparty (KYC)** checks using World Check to screen trading counterparties and contractors for compliance risks;
- **Responsible Sourcing Programme** which assesses social and environmental risks (including those associated with modern slavery) of metals and minerals suppliers operating within conflict affected and high-risk areas and/or selling certain high-risk metals in concentrate and semi-refined form; and
- **HSEC Contractor Due Diligence and Assurance** which assesses contractors providing certain high-risk services for a range of risks focused on health, safety and environmental impacts. Amongst other things, this process identifies poor working conditions, which are a red flag for modern slavery.

### Our due diligence process in summary

#### HSEC Contractor Due Diligence and Assurance



#### Responsible Sourcing Programme



### Know Your Counterparty

Under our KYC process, all of our trading counterparties and service contractors are screened through World Check for risks relating to corruption, money laundering and other compliance issues, as well as for sanctions. Given the nature of our trading business, trading counterparties are screened for compliance daily and certain other higher-risk service providers are also rescreened daily. If particular issues of concern are identified, these may be escalated to Trafigura's Compliance Committee.

On a Group-wide basis, Trafigura conducted 9,229 KYC checks in the reporting period (FY2021: 7,503 checks).

### Responsible Sourcing Programme

The Responsible Sourcing Programme assesses social and environmental risks (including those associated with human rights) of metals and minerals suppliers operating within Conflict Affected and High-Risk Areas (CAHRAs) and/or supplying certain high-risk metals in concentrate and semi-refined form. The programme follows our own policies and principles, and was developed with reference to the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains, the UNGPs and London Metal Exchange responsible sourcing requirements, amongst other international standards.

The Responsible Sourcing Programme involves desk-based research and supplier self-assessment questionnaires (including specific questions in relation to labour practices) for certain new and existing suppliers operating from specific higher-risk countries or supplying certain higher-risk commodities to Trafigura. Human rights-related aspects of the due diligence focus on health and safety performance, labour practices, working hours, training, the availability and

effectiveness of grievance mechanisms, the appointment and deployment of security forces and the incidence of human rights abuses in the value chain. Suppliers considered 'high-risk' based on these steps may then be subject to a site-based assessment including comprehensive interviews with workers, contractors and community members. We may then monitor and follow up with suppliers and, where appropriate, provide assistance to support their mitigation activities.

In FY2022, 156 counterparty diligence reviews were initiated by Trafigura's responsible sourcing team (2021: 145 diligence reviews). Of these, 89 counterparties were active in CAHRAs (2021: 95), as determined by the European Commission's CAHRA list. Trafigura undertook 25 site-based assessments in FY2022. Over the last two years, Trafigura has assessed counterparts in 47 different countries. The top three countries with the most counterparts that have been assessed are Mexico, the Democratic Republic of the Congo (DRC) and Bolivia.

In 2020, Trafigura made a commitment that its Metals and Minerals trading division would progressively align with the requirements of the International Guidance on Sustainable Procurement: ISO 20400:2017. At the end of 2022, the responsible sourcing programme was externally assured by ERM CVS to have an overall alignment status of 96 percent, having addressed a further 57 percent of the gaps identified in FY2020. Progress in FY2022 included integrating responsible sourcing parameters in the performance appraisal process for commercial teams, upgrading the performance monitoring tracker and dashboard, defining new responsible sourcing KPIs and targets, strengthening the counterparty diligence process, rolling-out training for traders on responsible sourcing and delivering capacity building workshops for counterparts in the DRC and Bolivia.

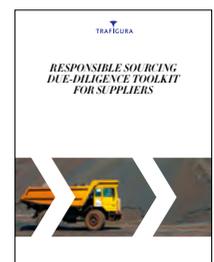
### Building capacity of Bolivian exporters

Trafigura purchases lead and zinc concentrates from Bolivian exporters. As is typical in the region, we are sourcing indirectly from mining cooperatives that are organised as groups of individual miners who each exploit areas of a mining concession allocated to the cooperative to which they belong. In FY2021, we extended our diligence programme in Bolivia; from understanding the risks associated with small-scale mining and determining the key improvements needed, to a focus on building capacity. Working with responsible sourcing specialists, Kumi, we implemented a programme of awareness raising and provided simple tools to improve performance, adapted to the needs and constraints of exporters and processors in Bolivia. Our supplier toolkit includes guidance on Trafigura's expectations, simple guides on how to put in place the fundamentals of a due-diligence management system and tools and templates for suppliers to use and adapt to their own businesses.

Representatives of Trafigura and Kumi have been regularly visiting suppliers to support them in implementing the due-diligence toolkit within their

operations. Using the toolkit, suppliers are supported to develop their own responsible minerals sourcing policy, map their supply chains and undertake due-diligence on their suppliers (who may be local traders or mining cooperatives). The toolkit provides both a simple supplier questionnaire and guidance on how to undertake site visits.

Despite the challenges, progress is being made. To date, 20 percent of our suppliers who have engaged in the pilot project have successfully implemented supply chain due-diligence programmes that meet our expectations. While we still have a significant amount of work to do, we remain committed to investing in the programme. Challenges to progress have included the fact that we are several tiers removed from the negative impacts that concern us, the general lack of awareness amongst suppliers of good practice, and the reality that we are the first buyers to impress upon suppliers the importance of responsible sourcing diligence. We will continue to engage with mining cooperatives in Bolivia to build their capacity and provide support, as required, to ensure a secure and sustainable supply.



[www.trafigura.com/brochure/trafigura-responsible-sourcing-due-diligence-toolkit-for-suppliers-overview](https://www.trafigura.com/brochure/trafigura-responsible-sourcing-due-diligence-toolkit-for-suppliers-overview)

**KUMI**

## Broadening Trafigura’s metals and minerals responsible sourcing diligence programme

In our 2021 Modern Slavery Statement, we committed to providing a detailed outline of how we have broadened the responsible sourcing diligence programme. An overview of the activities in this regard are summarised within Trafigura’s 2022 Sustainability

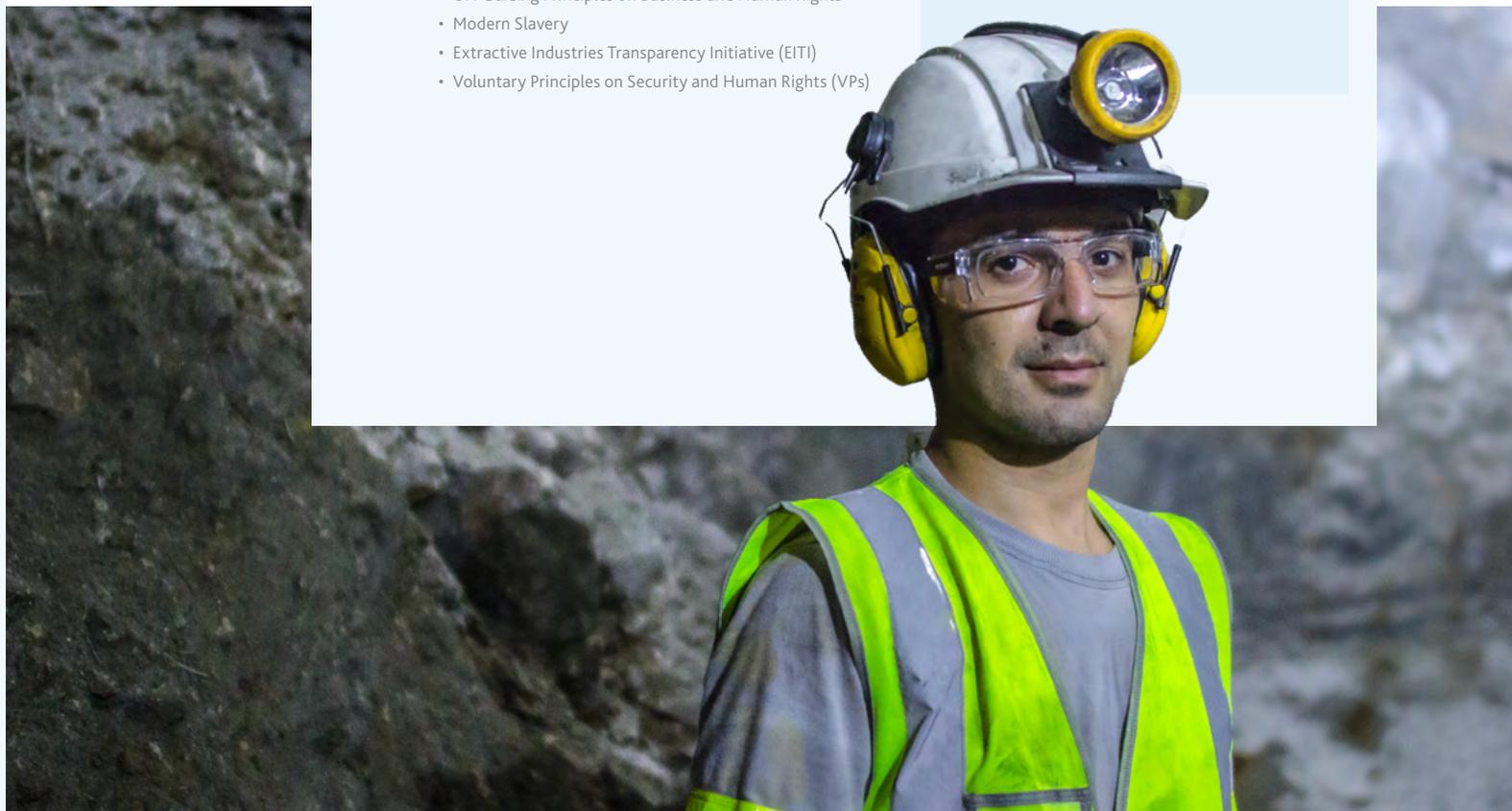
Report and given greater detail in its 2022 Human Rights Report. A major component of progress over the year included refinements and enhancements to targets in pursuit of responsible value chains. Targets include as follows:

### Responsible Sourcing Targets

In FY2022, as part of our progressive alignment with ISO20400:2017, Trafigura refined and enhanced its targets in pursuit of responsible value chains as follows.

Targets	Description	Completion date	Progress (FY2022)
1	All new metals traders and operators will be trained on our responsible sourcing policy and supporting programme on entry to the business	Continual	100% (on-track)
2	Trafigura will target full alignment of its Responsible Sourcing Programme with applicable elements of ISO20400:2017 as determined by an independent expert third-party assessor	End of FY2023	On-track
3	Trafigura will strengthen its digital infrastructure to continually improve the efficiency of its 'Level 0' and 'Level 1' diligence process	End of FY2023	In-progress
4	Trafigura's 'Level 2' site-based assessment protocol will be revised in accordance with policy amendments and stakeholder feedback	End of FY2023	To be initiated
5	100% of suppliers assessed at a site-level and defined as 'materially misaligned' with expectations will have an improvement plan in place within three-month period	Continual	To be reported in FY2023
6	100% of suppliers visited and assessed as 'materially misaligned' with expectations must demonstrate positive improvement <sup>9</sup> in performance within 24-month period	Continual	To be reported in FY2023
7	We will establish an online awareness raising platform for our upstream suppliers relating to at least three different topics of strategic importance to our value chain. Where examples may include: <ul style="list-style-type: none"> <li>• UN Guiding Principles on Business and Human Rights</li> <li>• Modern Slavery</li> <li>• Extractive Industries Transparency Initiative (EITI)</li> <li>• Voluntary Principles on Security and Human Rights (VPs)</li> </ul>	End of FY2024	To be initiated

<sup>9</sup> An 'improvement' is defined as a single level of enhancement in a counterpart's alignment with Trafigura's responsible sourcing expectations (i.e. their ranking moves from 'partially aligned' to 'aligned').



### HSEC contractor due diligence

Contractors who undertake activities that are considered high risk from a HSEC perspective are assessed through a two-phase due-diligence process. Contractor activities that have been assessed as high risk include ship-to-ship oil transfers, the trucking of commodities, bulk oil storage and the disposal of liquid waste from vessels.

#### Testing our perspective on modern slavery risk

We are committed to periodically reviewing, testing and verifying our understanding of modern slavery risk. In FY2022, Trafigura conducted a desk-based assessment of office service providers, specifically those offering cleaning and building maintenance services for Trafigura's offices worldwide. The assessment sought to establish whether any service provider had been identified in the public domain as having been engaged in or linked to modern slavery of any kind. The review did not identify any such instances however Trafigura is committed to enhancing diligence on this matter and will report on such efforts in future.

The first phase involves desk-based due diligence that seeks to confirm the contractor's ability to meet minimum HSEC expectations, including whether it has competent staff, sound maintenance procedures and the necessary equipment to perform its work safely. Contractors that pass this assessment may then have an on-site inspection. Contractors that fail due diligence but are willing and able to work to upgrade their processes can gain temporary approval for an interim period. Those that are unable or unwilling to improve, as identified through follow-up reviews and audits, are rejected.

In FY2022, Trafigura undertook 557 contractor HSEC assessments.



#### Assessment of our chartered fleet

We recognise that a range of risks to labour rights, including to those of seafarers, are present in our shipping and chartering operations and supply chain. These include risks to the right to freedom from forced labour and rights relating to wages and working hours, discrimination, freedom of association and collective bargaining.

In FY2022, we conducted a formal assessment of the Seafarers' Rights and Welfare Code of Conduct, developed by the Sustainable Shipping Initiative, Institute for Human Rights and Business and the Rafto Foundation for Human Rights. Our objective was to establish the merits of its potential implementation across Trafigura's shipping interests with a particular focus on if and how the Code exceeded existing compliance considerations embedded within and enforced through adherence to the Maritime Labour Convention

The majority of Trafigura's shipping requirements are met by fixing vessels on a voyage or time-chartered basis. Typically, this comprises many business relationships and approximately 300 vessels on the water at any one time. Far smaller is Trafigura's fleet of owned vessels, whose management in FY2022, including staffing, was overseen by six third-party 'Technical Managers'. We engaged our Technical Managers through requesting a self-declaration of performance against the Code, which consequently resulted in a desk-based review by Trafigura of all labour sending agencies contracted by the Technical Managers with a view to identifying any negative media coverage or NGO reporting. No such cases were identified.

While evaluation results were satisfactory, we are continuing to explore opportunities for improvement through engagement with our Technical Managers on such matters to further strengthen our approach and procedures to assess risks and improve performance in FY2023.

2022 Trafigura  
Human  
Rights Report:  
[www.trafigura.com/2022SR](http://www.trafigura.com/2022SR)

## Awareness raising and training

All TPTE employees are required to complete mandatory online compliance training, including a module on our Code of Business Conduct, and modules focused on preventing practices such as bribery, corruption and money laundering, which may increase modern slavery risks.

New-starter TPTE employees are required to complete corporate responsibility training, which includes an overview of our human rights commitments.

TPTE has two mandatory responsible sourcing training modules for its Metals and Minerals division. One of the modules provides a detailed overview of Trafigura's due diligence process and how social and environmental risks in the value chain are considered. The other module is designed to help traders to engage confidently with existing and potential counterparts, financiers and other stakeholders on the topic of responsible sourcing. In the reporting period, 447 TPTE employees completed these modules.

During FY2022, Trafigura also developed and rolled-out two mandatory modern slavery training modules for TPTE traders. The training incorporates an overview of:

- What modern slavery is;
- Why it is important for businesses to take action on modern slavery with a focus on evolving stakeholder expectations;
- Our key modern slavery risks associated with trading specific commodities or products;
- Our approach to managing modern slavery risks; and
- How traders can take steps to help us to prevent and mitigate modern slavery risks.

The training incorporates practical examples to support traders' understanding of how modern slavery risks can arise across the value chain, including when buying, transporting, storing, blending and refining, and selling commodities. It also includes a range of company specific scenarios, focused on raising awareness on the topic, identifying and addressing supply chain risks and building an appreciation of different context-specific management approaches. At the end of the training, employees are required to complete an assessment of their understanding.

By the end of FY2022, over 97 percent of all TPTE staff members had completed the modern slavery risks training. New joiners to the business will continue to be required to complete this training as standard.

Using a risk-based approach, Trafigura also engaged with certain higher risk suppliers to build its capacity to understand and meet its human rights expectations. Trafigura has a page on its website devoted to setting out its responsible sourcing expectations of suppliers, an animated video and explanatory booklet. Trafigura also has a suite of tools designed to explain the Responsible Sourcing Programme to downstream receivers of metals and minerals. Counterparties are typically directed to these pages over the course of commercial discussions with traders. As noted in the Responsible Sourcing Programme section of Trafigura's Sustainability Report, in FY2022, Trafigura has delivered capacity building workshops for counterparties in the DRC and Bolivia. Workshops explain how Trafigura's diligence functions and presents information on how suppliers should structure their own systems so as to align with international standards.

## Grievance mechanisms and remediation

We encourage the identification and escalation of issues, including modern slavery risks, relating to the Reporting Entities that may negatively impact our operations and/or our reputation, the wellbeing of employees or our communities.

The Trafigura Group has deployed 'EthicsPoint', an anonymous 24/7 multilingual telephone hotline and web reporting service provided by NAVEX Global, to facilitate the reporting of grievances. The system accepts a wide range of grievances, including those relating to modern slavery, and the service is available to all internal and external stakeholders, including those of the Reporting Entities.

EthicsPoint is promoted via several channels, including the Trafigura website and through training. Once a grievance is received it is channelled to specific departments, as relevant, in accordance with Trafigura's 'Global Grievance Mechanism Guidelines'. Procedures are in place to avoid real or perceived conflicts of interest during investigations and in Trafigura's response. As stated in our Code of Conduct, any form of internal retaliation against employees who seek advice, raise a concern or report a violation of the Code will not be tolerated.

At an operational level, all major installations of the Reporting Entities and owned or controlled entities are also required to maintain a grievance process through which any stakeholder can raise a concern. The process is supported by a range of corporate policies and a standardised toolkit entitled 'Global Grievance Mechanism Guidelines', as well as Trafigura's 'Operation Level Guidance for the Handling of Complaints & Grievances', which references the fact that grievance mechanisms implemented across the Group, including for the Reporting Entities, must aim to be consistent with the UNGP effectiveness criteria for non-judicial grievance mechanisms.

We are not aware of any reported allegations of modern slavery raised through Trafigura's grievance mechanisms during the reporting period, although we acknowledge that this does not necessarily mean that no modern slavery was present in our operations or supply chains.

# Assessing effectiveness

We recognise the importance of assessing the effectiveness of actions taken to address human rights risks and impacts, including in relation to modern slavery.

Our human rights and environmental performance is measured and reported to the HSEC Steering Committee or Commercial ESG Steering Committee, as appropriate, and we seek to continually improve our performance through effective management systems implemented across our operations. The measures that we have in place are monitored and assessed to address human rights impacts, including modern slavery impacts.

While various performance indicators have been included directly within this Statement, further details of Trafigura's social and environmental performance, including those relevant to the Reporting Entities, can be found in Trafigura Group's 2022 Sustainability Report and 2022 Human Rights Report.



# Engagement and collaboration

We recognise that addressing modern slavery requires collective action from host governments, businesses, civil society organisations and non-governmental organisations, trade unions and other stakeholders.<sup>10</sup>

<sup>10</sup>The key stakeholders with which we engage are listed here: [www.trafigura.com/sustainability/key-stakeholders](http://www.trafigura.com/sustainability/key-stakeholders)

The Group seeks feedback on its approach to human rights (including modern slavery) through multi-stakeholder and other stakeholder engagement activities. See the 2022 Human Rights Report for further information on the multi-stakeholder initiatives with which Trafigura engages.

## Multi-stakeholder forum held in Johannesburg

Multi-stakeholder forums (MSFs) are an important part of Trafigura's approach to transparency. These extended meetings allow Trafigura to engage at length with stakeholders and gain an understanding of different perspectives. Meetings encourage frank and open discussions.

In September 2022, Trafigura's Johannesburg office hosted a MSF. The event was co-chaired by its Head of Metals Trading for Africa and Professor Nellie Mutemeri of the University of the Witwatersrand. It incorporated a diverse range of stakeholders with a keen interest and deep knowledge of natural resources. It included representatives of the European Union, UK Government, civil society organisations such as Oxfam and Southern African Resource Watch, prominent South African universities, several of Trafigura's financing banks, the World Bank and a major producer partner.

The MSF sought to navigate how the explosion in demand for base and critical minerals can better promote development and support the smooth functioning and productivity of modern economies and societies. Discussions ranged from supply and demand dynamics, the role of Trafigura in the region, existing and emerging production challenges, opportunities for regional prosperity and the capacity of supply chain actors to respond to ESG expectations and regulations.



# Looking forward

We recognise the need to continually improve our response to modern slavery risks. Our performance in response to targets set in FY2022 has been documented in this Statement and summarised in an index on page 23.

In FY2023, we aim to work in collaboration with the rest of the Trafigura Group in relation to the following key topics to:

- **Review and update policy commitments:**  
Revise and update policies with direct relevance to modern slavery so as to reflect risks, changes to ESG Governance structure, as well as changes in the global regulatory environment.
- **Management system:**  
Continue to develop supporting tools and Trafigura's management system to promote effective implementation at an appropriate scale of Trafigura's responsible sourcing programme in close collaboration with supporting functions internally.
- **Extension of responsible sourcing diligence:**  
In response to risks identified outside of the scope of the existing metals and minerals responsible sourcing programme, implement additional checks related to the activities of suppliers, specifically in Bolivia and Peru.
- **Enhancement of diligence relevant to the welfare of seafarers:**  
In response to the potential for modern slavery in relation to seafarers appointed by technical managers on vessels owned by TPTE's owned or controlled entities, roll out additional checks so as to mitigate the associated risks.
- **Access to remedy:**  
Uphold and extend the existing responsible sourcing capacity building programme for suppliers operating in high-risk regions, handling high-risk products and/or engaged in high-risk activities.
- **Stakeholder engagement:**  
Hold multi-stakeholder forums with a view to enhancing Trafigura's appreciation for and response to salient impacts across our value chain, including those related to modern slavery.
- **Training:**  
Continue rolling out modern slavery training modules for traders in the Metals and Minerals and Oil and Petroleum Products divisions and assess their effectiveness.



Tan Chin Hwee (Chen Jinghui), Director of TPTE  
31 March 2023

# Reporting criteria index

UK Modern Slavery Act recommended reporting criterion	Australian Modern Slavery Act mandatory reporting criterion	Reference in this statement
Organisation's structure, its business and its supply chains.	Identify the reporting entity.	See 'Scope and disclosure notes' (inside front cover)
As above.	Describe the reporting entity's structure, operations and supply chains.	See: 'Structure, operations and supply chains' (pages 3 to 7)
Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	See: 'Identifying modern slavery risks' (pages 8 to 10)
Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	See: 'Actions to assess and address modern slavery risks' (pages 11 to 18)
Organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe how the reporting entity assesses the effectiveness of such actions.	See: 'Assessing effectiveness' (page 19)
N/A	Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	See: 'Consultation with owned and controlled entities' (inside front cover)
N/A	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	See: 'Engagement and collaboration' (page 20) and 'Future actions' (page 21)

# Performance index against stated commitments

We recognise the need to be transparent in our achievements and shortcomings in combatting modern slavery risks. Outlined below are the commitments we made in our FY2021 Modern Slavery Statement, the status of our activities in response, and references as applicable where such commitments are reported within our FY2022 Modern Slavery Statement, Trafigura Group's 2022 Human Rights Report and Sustainability Report.

FY2021 Commitment	Status	Reference within this report
<p><b>Review and update policy commitments:</b> Revise and update policies with direct relevance to modern slavery so as to reflect risks, changes to ESG Governance structure, as well as changes in the global regulatory environment.</p>	In progress	See: 'Looking forward' (page 21)
<p><b>Extension of responsible sourcing diligence:</b> In response to risks identified outside of the scope of the existing metals and minerals responsible sourcing diligence programme, implement additional checks related to the activities of suppliers, specifically in Bolivia and Peru.</p>	In progress	See: 'Responsible sourcing' (page 15) and 'Awareness raising and training' (page 18)
<p><b>Enhancement of diligence relevant to the welfare of seafarers:</b> In response to the potential for modern slavery in relation to seafarers appointed by technical managers on vessels owned by the Reporting Entities, roll out additional checks so as to mitigate the associated risks.</p>	In progress	See: Trafigura's 2022 Human Rights Report
<p><b>Access to remedy:</b> Uphold and extend the existing responsible sourcing capacity building programme for suppliers operating in high-risk regions, handling high-risk products and/or engaged in high-risk activities.</p>	In progress	See: 'Responsible sourcing' (page 15), 'Awareness raising and training' (page 18) and 'Engagement and collaboration' (page 20)
<p><b>Stakeholder engagement:</b> Hold multi-stakeholder forums with a view to enhancing Trafigura's appreciation for and response to salient impacts across our value chain, including those related to modern slavery.</p>	In progress	See: 'Engagement and collaboration' (page 20)







**Trafigura Pte. Ltd &  
Trafigura Asia Trading Pte. Ltd.**

10 Collyer Quay #29-01/05  
Ocean Financial Centre  
Singapore 049315  
Email: [enquiries@trafigura.com](mailto:enquiries@trafigura.com)

[www.trafigura.com](http://www.trafigura.com)  
TM/0428.1e  
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