

A circular inset image showing a worker in a hard hat and safety vest walking away from the camera in a dimly lit tunnel. The tunnel walls are lined with pipes and cables, and the floor is wet and reflective. The scene is illuminated by warm, yellowish lights, creating a sense of depth and perspective.

**2021  
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 2020 to 30 September 2021 (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 and/or controlled entities as a group; and (ii) shall not include Nyrstar, which is making its own statement for the purposes of the Australian MSA and is not a reporting entity under the UK MSA. The words 'we', 'us' and 'our' are used to refer to TPTE, TAT and owned and/or controlled entities, in general.

This Statement was approved by the Board of TPTE, as the parent entity of TAT, on behalf of both Reporting Entities on 31 March 2022 and has been signed by Tan Chin Hwee (Chen Jinghui), Director of TPTE.

## **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 and/or controlled entities, namely Corporate 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 and/or controlled entities.

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This document accompanies Trafigura's 2021 Human Rights Report and 2021 Sustainability Report. Please visit [www.trafigura.com/2021SR](http://www.trafigura.com/2021SR) and [www.trafigura.com/sustainability](http://www.trafigura.com/sustainability)



[www.trafigura.com/2021SR](http://www.trafigura.com/2021SR)



[www.trafigura.com/brochure/2021-human-rights-report](http://www.trafigura.com/brochure/2021-human-rights-report)

# Our human rights commitment

We recognise that our activities can have an impact, both positive and negative, on people and the environment, and it is important that we act responsibly. Taking action to address modern slavery risks aligns with our values and supports our stated objective to respect human rights.

We support the UN Guiding Principles on Business and Human Rights (UNGPs), are progressively implementing the Voluntary Principles on Security and Human Rights and are committed to respecting internationally recognised human rights.

We recognise that businesses can cause, contribute to or be directly linked to modern slavery through their operations and business relationships and that appropriate action will depend upon our level of involvement, in line with international standards. 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

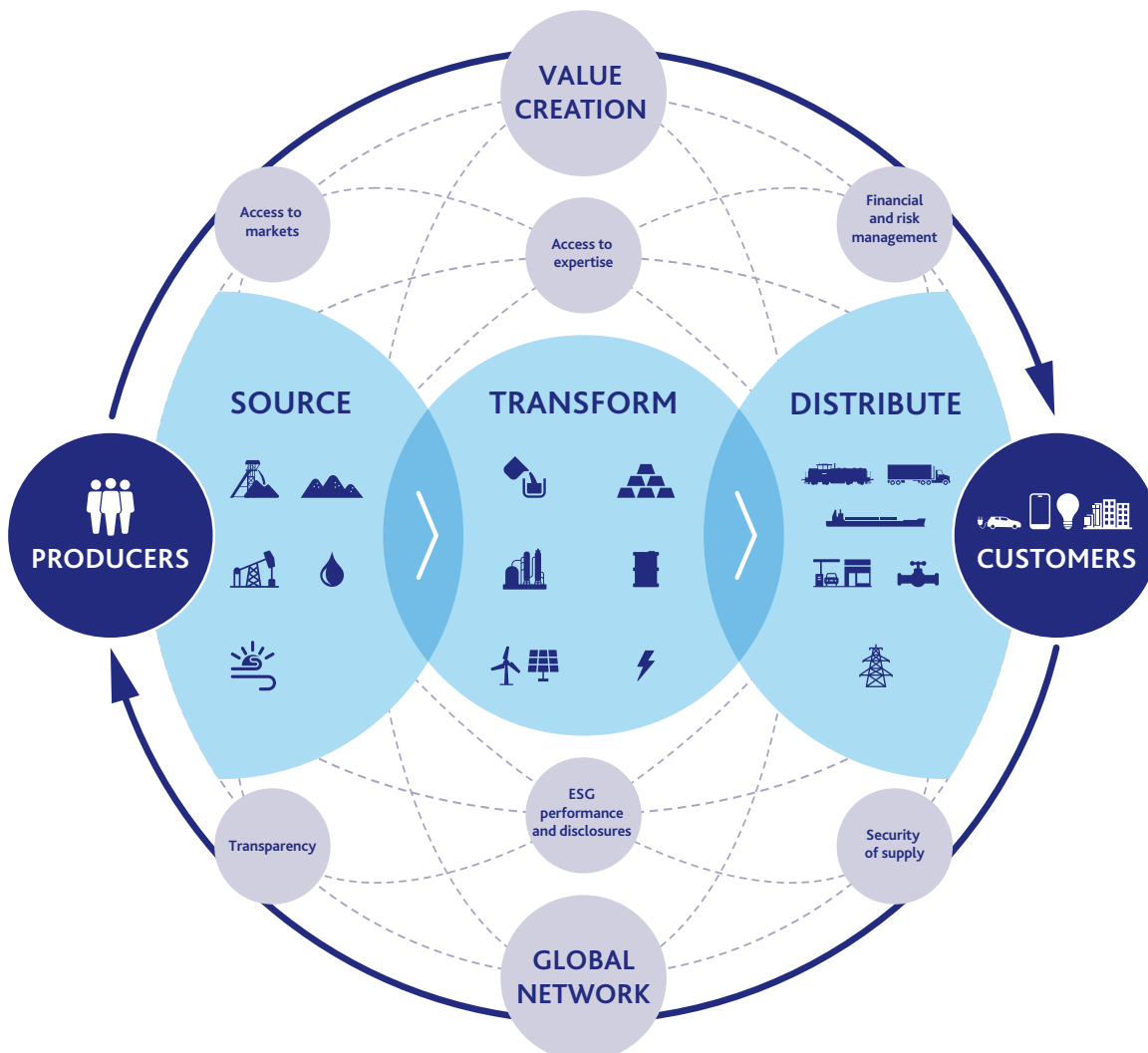
The Trafigura Group is an independent, employee-owned physical trading and logistics business. The Group supplies commodities that are essential to the daily lives of people around the world, connecting producers and consumers reliably, efficiently and responsibly.

As one of the world's largest independent trading firms, the Trafigura Group employs over 9,000<sup>1</sup> people across 48 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 the world with the vital resources it needs. Through our Oil and Petroleum Products, Metals and Minerals and Power Divisions, we deploy infrastructure, skills and a global network to move commodities from where they are plentiful to where they are needed most, forming strong relationships that make supply chains more efficient, secure and sustainable.

<sup>1</sup> Total employee numbers over the financial year and comprise employees of consolidated Trafigura Group businesses, operations and offices. MATSA, Porto Sudeste and Impala joint venture employees are excluded as these assets are not consolidated in the Trafigura Group financial accounts. Puma Energy was consolidated in Trafigura's balance sheet from 30 September 2021. As at 30 September 2021, the current total number of Group employees was 13,268 (9,037 Trafigura and 4,231 Puma Energy).



## 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 945 people (FY2020: 921 people) across five offices (FY2020: 5 offices) located in five countries (FY2020: 5 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 and/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.
- **Oil refineries:**  
entities which own and/or operate refineries, which transform oil into a range of petroleum products.
- **Mining:**  
entities which own and/or manage mines.
- **Warehousing and storage services:**  
entities which provide warehousing and storage services to support Trafigura's trading activities and third-party clients.
- **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 refuelling. 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.
- **Power:**  
An entity which trades power.

TPTE also owns and/or controls a number of holding companies.

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

- Oil storage, distribution and refining;
- Port operations;
- Shipping and bunkering;
- Mining, extractives and smelting; and
- Agriculture.

TPTE's owned and/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 and joint ventures.



## Supply chains

### Latin America: 6%

Chile, Colombia, Ecuador, Mexico, Peru

### North America: 7%

Bahamas, Belize, Canada, Cayman Islands, USA

### Middle East: 10%

Brunei Darussalam, Iraq, Qatar, Saudi Arabia, UAE

### Far East: 29%

China, Hong Kong, India, Japan, Singapore

### Africa: 5%

DRC, Mauritius, Nigeria, South Africa, Zambia

### Oceania: 2%

Australia, Marshall Islands, PNG, Samoa

### Europe: 40%

Belgium, Netherlands, Russia, Switzerland, UK

**Breakdown of purchase data for the Reporting Entities by region and top five countries**

Region	Percentage
Europe	40%
Far East	29%
Middle East	10%
North America	7%
Latin America	6%
Africa	5%
Oceania	2%

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

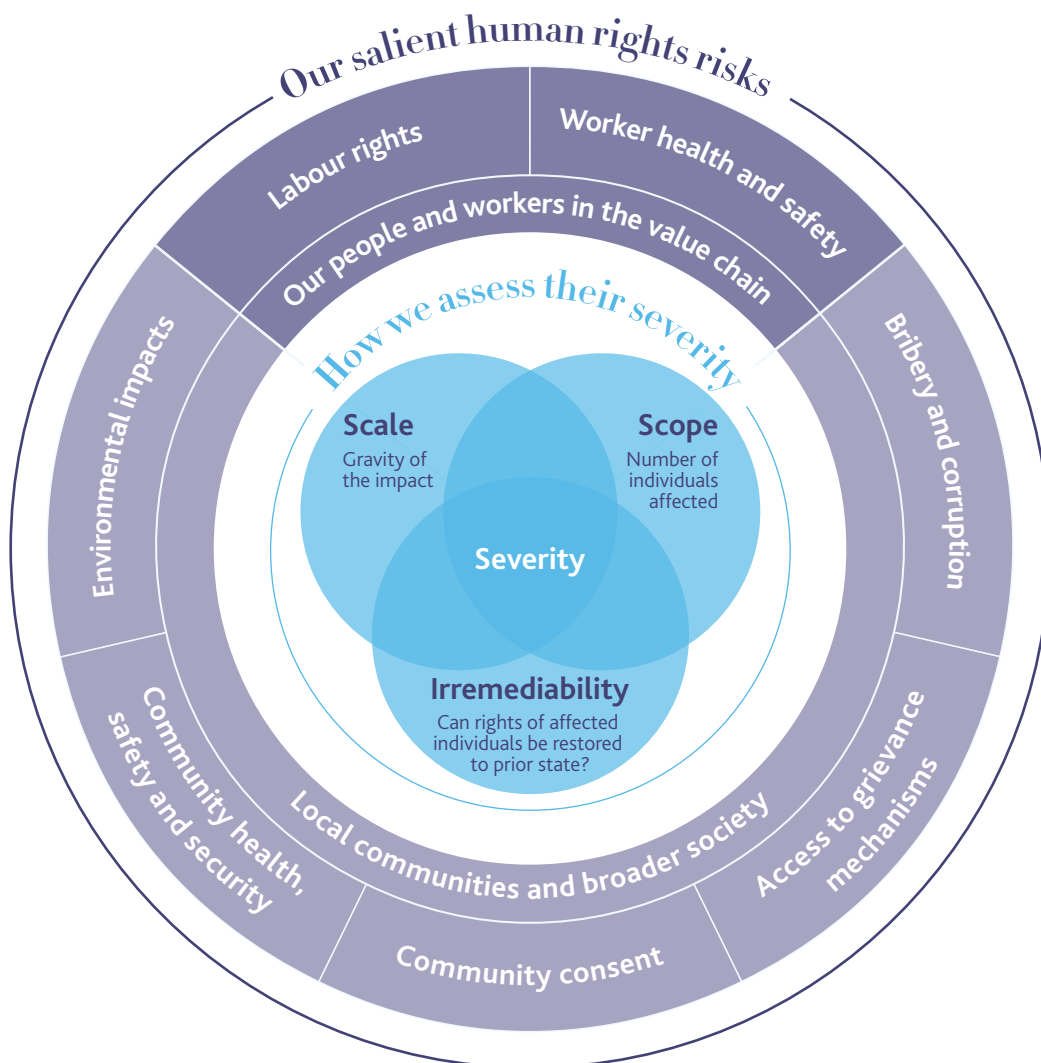
The Reporting Entities’ activities are technically complex and geographically dispersed. We recognise that, given the nature and extent of our global activities and the commodities we trade, there are risks of modern slavery in our value chain. We have policies and processes in place to assess and address these risks.

## Mapping our risks

During 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 2021 Human Rights Report, involved identifying, at a high level, the Group’s actual and potential human rights impacts, including those relevant to the Reporting Entities.

This process included engagement with internal stakeholders from a range of businesses and functions and assessed the severity of those impacts from the point of view of rights-holders. The findings directly informed the risks of immediate relevance to the Reporting Entities, including but not limited to the labour rights of employees and people in their value chains, such as seafarers, as one of the key modern slavery risks to be prioritised for mitigation.

2021 Trafigura  
Human  
Rights Report:  
[www.trafigura.com/  
brochure/2021-  
human-rights-report](http://www.trafigura.com/brochure/2021-human-rights-report)





## Modern slavery risk areas

### UNGPs' continuum of involvement

We use the UNGPs' continuum of involvement to assess our risk of involvement in human rights, including in relation to modern slavery, across our operations and supply chains. Our approach to managing human rights impacts is set out in Trafigura Group's 2021 Human Rights Report and summarised in the table below.

2021 Trafigura  
Human  
Rights Report:  
[www.trafigura.com/  
brochure/2021-  
human-rights-report](http://www.trafigura.com/brochure/2021-human-rights-report)

## Trafigura's approach to managing human rights impacts

Where we are...	Asset owners and operators	or	Procurers of goods and services	or	Industry participants
If we identify that we have...	caused, or may cause, a negative impact on people or the environment (e.g. at owned assets)	or	contributed to, or may contribute to a negative issue (e.g. through supplier agreements or contracting)	or	a link between a harm and our operations, products or services, but Trafigura did not cause or contribute to it
First we...	stop or prevent the action causing the harm	or	stop or prevent the action contributing to the harm. Use influence to mitigate any remaining impact to the greatest extent possible	or	build or use leverage to prevent or mitigate the impact of the impact continuing or recurring to the greatest extent possible
Second we...	provide for or cooperate in remediation of the harm	or	provide for or cooperate in remediation of the harm	or	consider if we play a role in any remediation and seek to motivate change

This section outlines six modern slavery risk areas in the operations and supply chains of TPTE, its owned and/or controlled entities and TAT<sup>2</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. We identified our 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 has 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>2</sup>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 and/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.

## Risk areas

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 and/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 sectors in which TPTE and its owned and/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 investees 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. 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.

### 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. 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:

TPTE and its 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 (see page 14).

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

TPTE owns and/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

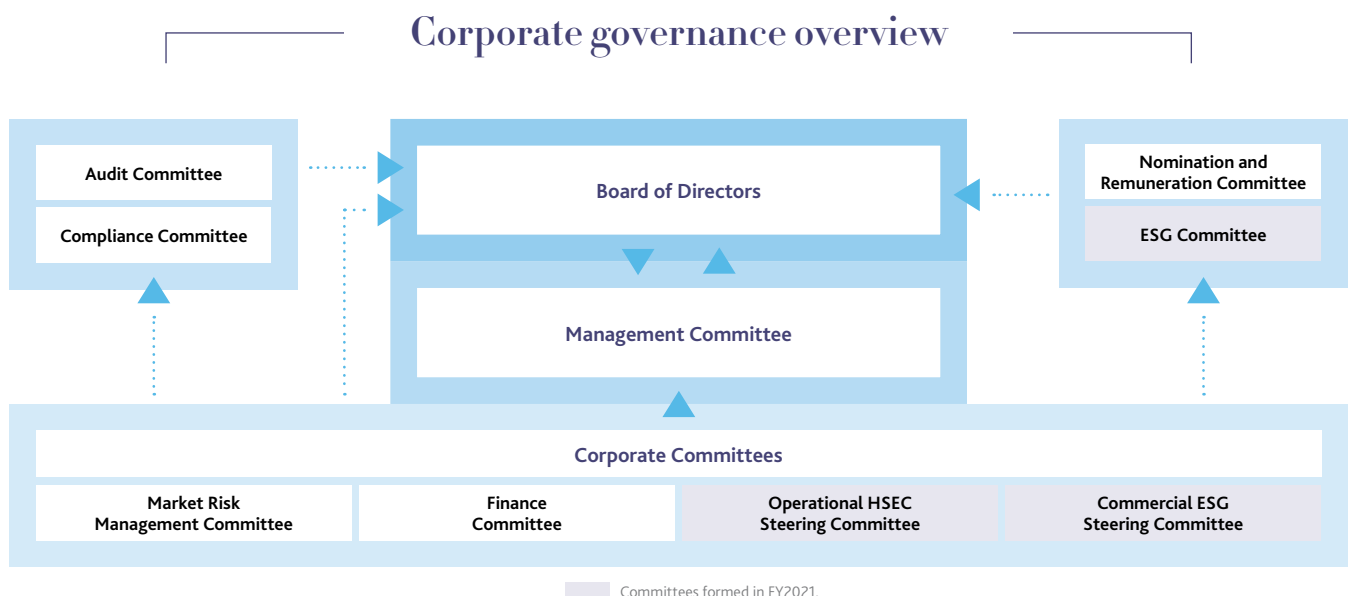
We are committed to progressing responsibility standards in commodities trading and identifying and mitigating modern slavery risks. Consistent with this commitment, a range of actions has been taken to help to assess and address our modern slavery risks.

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, over the course of our responsible sourcing due diligence process, we are committed to seeking to influence their behaviour. This has included 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. The principal oversight body of the Trafigura Group is the Board of Directors, which sets the strategic direction and management of the Group. Entities within the Group adopt and implement policies and standards to mitigate environmental, social and governance (ESG) risks, including those related to modern slavery, relevant to specific operational contexts.

In FY2021, the Trafigura Group's ESG governance structure was enhanced by the introduction of an Operational HSEC Steering Committee and Commercial ESG Steering Committee. It is the responsibility of these committees to oversee human rights (including modern slavery) performance on behalf of all Group entities, including the Reporting Entities.






## Policies and guidelines







There are a number of policies and guidelines in place that define how we conduct business. The policies and guidelines that are most relevant to the management of our modern slavery risks are described below.

All policies and guidelines are made available to staff through the Trafigura Group intranet and, where applicable, are supported by e-learning tools, as well as explanatory videos and animations to promote uptake and familiarisation. Many of them are also available on Trafigura’s website and are increasingly referenced within commercial agreements of the Reporting Entities, particularly where Trafigura is procuring goods from suppliers in high-risk areas or services from contractors engaged in high-risk activities.

In FY2021, a number of the existing policies to which the Reporting Entities are subject were reviewed to explore improvement opportunities in relation to assessing and addressing modern slavery risks. The review covered alignment of these policies and principles with industry frameworks, stakeholder expectations and the activities and positions of a number of our peers. In FY2022, we expect to launch revised versions of the reviewed policies.

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 acting within the law, in accordance with internal policies and in an ethical manner.</p>
<p><b>Corporate Responsibility Policy</b>  <a href="http://www.trafigura.com/brochure/trafigura-corporate-responsibility-policy">www.trafigura.com/brochure/trafigura-corporate-responsibility-policy</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 and to seek to address such impacts when they occur, and to seek to mitigate adverse social and environmental impacts that are 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</b>	<p>Sets out the Board’s expectations of the Group and its divisions and operating companies in relation to corporate responsibility. The Business Principles 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 with relevant 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>		<p> <b>Contractors</b></p> <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>		<p> <b>Suppliers</b></p> <p>Sets out expectations for suppliers, including that they should not profit from, contribute to, assist with or facilitate the commission of serious abuses, including forced or compulsory labour, the worst forms of child labour and other gross human rights violations and abuses. The Expectations also outline Trafigura's approaches to supply chain due diligence and supplier engagement.</p>
<p><b>Global Grievance Mechanism Guidelines</b></p>	<p> <b>Employees and external stakeholders</b></p>	<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 (including supply chain workers) through its online grievance management system, EthicsPoint.</p>
<p><b>Operation Level Guidance for the Handling of Complaints and Grievances</b></p>	<p> <b>Employees</b></p>	<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>

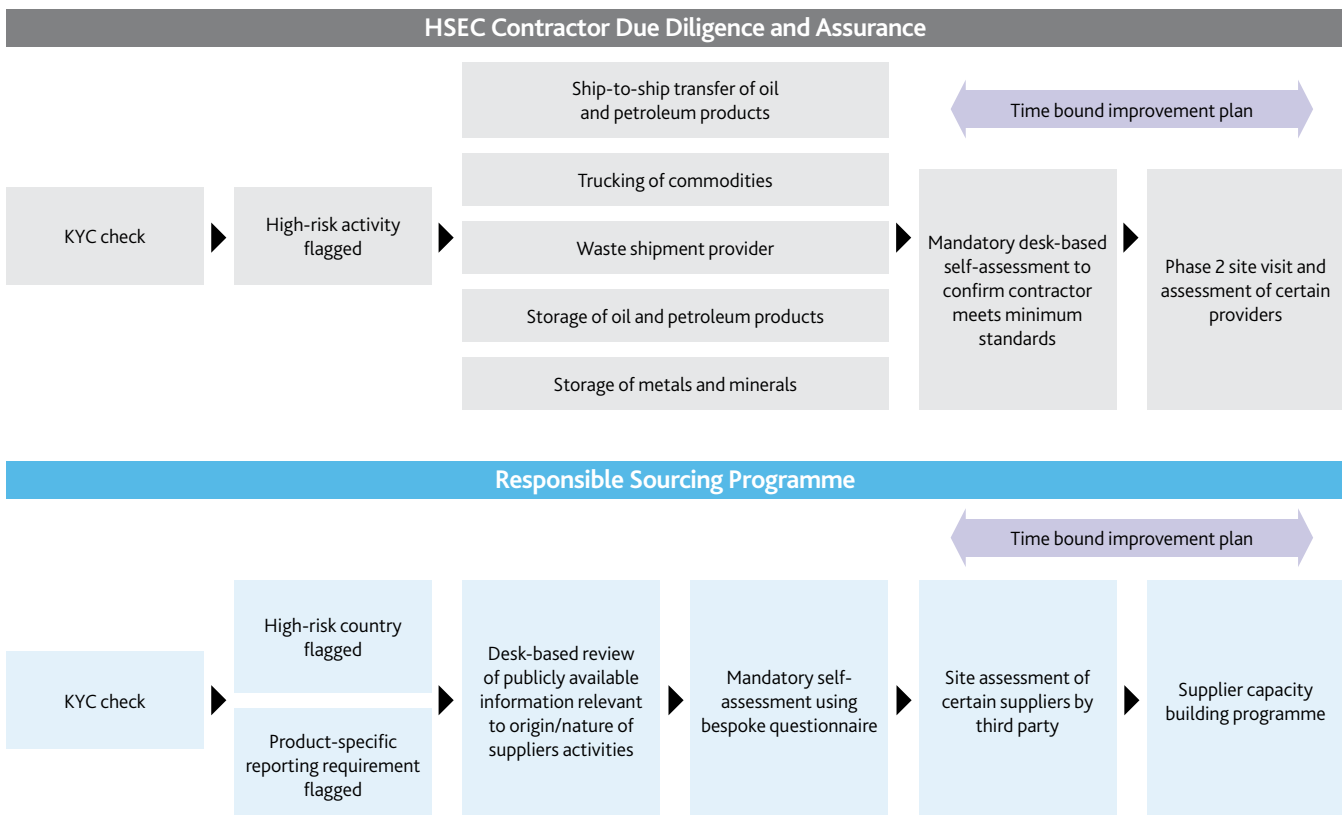
### Our due diligence processes

We have three key due diligence processes in relation to our counterparties, including contractors, which focus on identifying and prioritising those activities in our supply chains where risks to people and the environment are greatest. All processes are detailed in full in Trafigura’s 2021 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 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.

2021 Trafigura Sustainability Report  
[www.trafigura.com/2021SR](http://www.trafigura.com/2021SR)

### Our due diligence process in summary

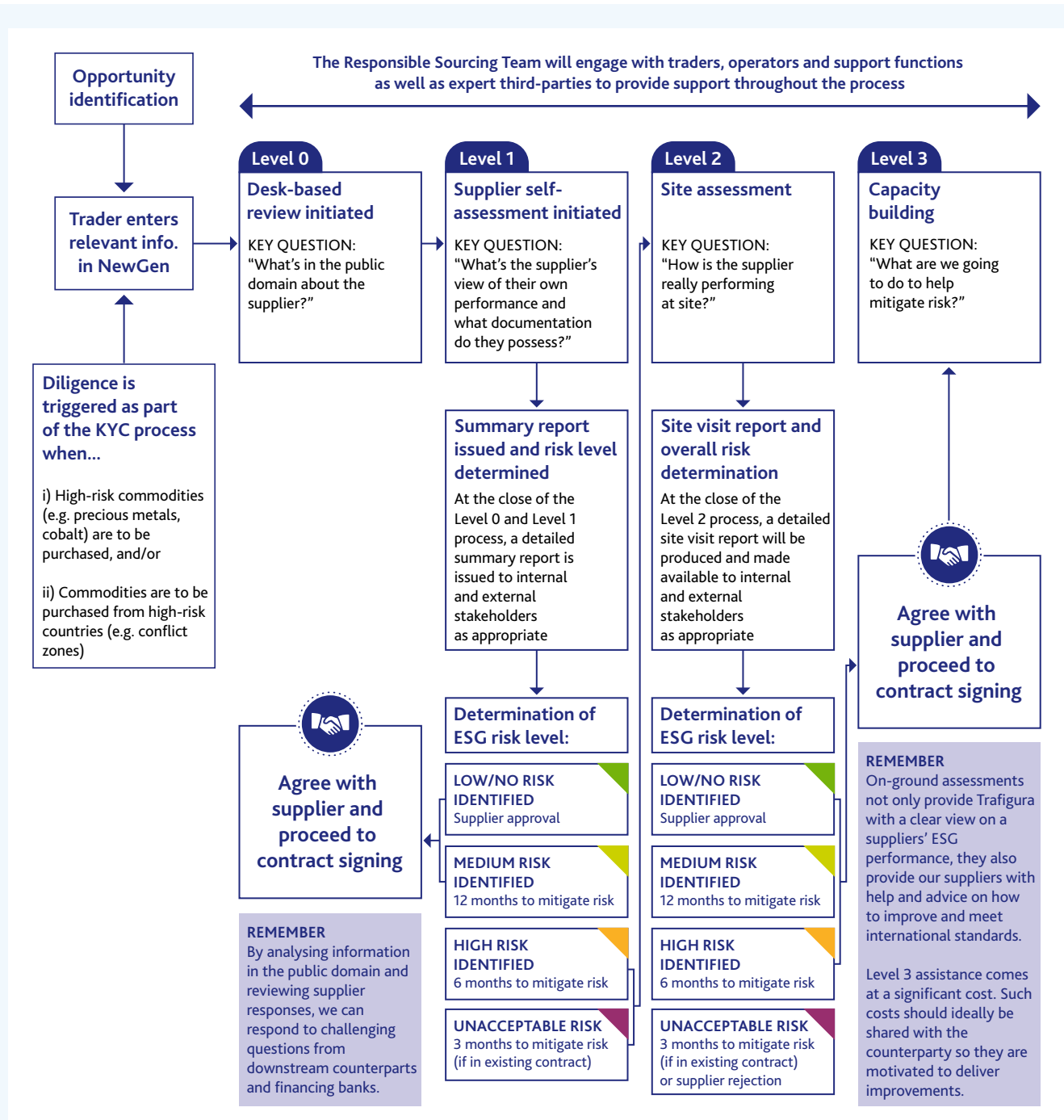


### Responsible Sourcing Programme

The extraction, handling, processing, transportation and trading of commodities has the potential to generate income, growth and prosperity, sustain livelihoods and foster development, but these activities may involve modern slavery risks. Accordingly, suppliers that are considered high risk as a result of providing metals and minerals in concentrate and semi-refined form are subject to detailed due diligence through the Responsible Sourcing Programme. A full description of the Responsible Sourcing Programme and how it works can be found on Trafigura's website, as well as within the Trafigura Group's 2021 Sustainability Report and 2021 Human Rights Report. The following diagram summarises how the diligence process functions.

In FY2021, a total of 145 counterpart due diligence reviews were initiated, of which the majority related to trades undertaken by TPTE. Of these, over 70 counterparts were active in Conflict Affected and High Risk Areas (CAHRA). Further to diligence efforts undertaken in FY2021 in relation to negative human rights impacts in the metals value chain, including those related to modern slavery, it was agreed that the existing scope of the term 'CAHRA', as defined for the Reporting Entities, would be broadened to incorporate the activities of suppliers in Bolivia and Peru. Our 2022 Modern Slavery statement will detail activities associated with the broadening of the responsible sourcing diligence programme.

2021 Trafigura Human Rights Report: [www.trafigura.com/brochure/2021-human-rights-report](http://www.trafigura.com/brochure/2021-human-rights-report)



### Seafarer welfare during the COVID-19 pandemic

The use of vessels to carry a range of oil and petroleum products, gas and metals and minerals can involve human rights risks, including modern slavery. The COVID-19 pandemic has exacerbated these risks, including through the restriction of crew changes, which has the potential to create situations where seafarers become more vulnerable to labour exploitation.

To address the risks associated with crew change restrictions, we:

- Compensated seafarers for the additional time spent on our owned vessels through the payment of bonuses;
- Diverted vessels to accessible ports so that crew changes could occur, where possible

In order to respond to a heightened level of risk associated with modern slavery among seafarers – specifically where seafarers are recruited by third-party technical managers appointed to oversee the operation of vessels owned by the Reporting Entities – additional checks will be rolled out in FY2022 in alignment with the Seafarers' rights Code of Conduct.

*Seafarers' rights  
Code of Conduct:*

[www.sustainableshipping.org/wp-content/uploads/2021/10/Seafarers-rights-Code-of-Conduct.pdf](http://www.sustainableshipping.org/wp-content/uploads/2021/10/Seafarers-rights-Code-of-Conduct.pdf)





99%

Completion rate of mandatory compliance training by existing employees (2020: 99 percent)

99%

Completion rate of mandatory compliance training by new-starter employees (2020: 97 percent)

### Awareness raising and training

We require employees 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.

In the reporting period, Trafigura also developed two online training modules on responsible sourcing which are mandatory for TPTE's Metals and Minerals traders. In the reporting period, 137 TPTE employees completed these modules. The training is aimed at strengthening understanding of human rights and responsible sourcing frameworks such as the OECD Guidance (see the Trafigura 2021 Human Rights Report for further information).

Using a risk-based approach, the Reporting Entities also engage with selected suppliers to build their capacity to understand and meet expectations including in relation to modern slavery, including developing relevant policies and procedures and promoting the sharing and adoption of similar standards across the supply chain.

In FY2021, the Trafigura Group launched a page on its website specifically devoted to setting out the expectations on responsible sourcing for suppliers, including those expectations of the Reporting Entities.

In FY2021, the Trafigura Group also launched a suite of tools designed to explain the Responsible Sourcing Programme to downstream receivers of metals and minerals. See the Trafigura 2021 Human Rights Report for further information.

### 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. Procedures are in place to avoid real or perceived conflicts of interest during investigations and in our response. As stated in the 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.

In the reporting period, a global assessment of the effectiveness of EthicsPoint was undertaken with a view to ensuring that all channels of communication were fully functioning. Please refer to the Trafigura 2021 Human Rights Report for further information.

At an operational level, all major installations of the Reporting Entities and owned and/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', which was updated in FY2021, as well as our 'Operation Level Guidance for the Handling of Complaints & Grievances', which explicitly references the fact that grievance mechanisms implemented across the Group, including for the Reporting Entities, must 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 our 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.

2021 Trafigura  
Human  
Rights Report:

[www.trafigura.com/  
brochure/2021-  
human-rights-report](http://www.trafigura.com/brochure/2021-human-rights-report)

Trafigura Code of  
Business Conduct:

[www.trafigura.  
com/brochure/  
trafigura-code-of-  
business-conduct](http://www.trafigura.com/brochure/trafigura-code-of-business-conduct)

# Assessing effectiveness

Our human rights and environmental performance is measured and reported to the Group's Operational HSEC Steering Committee and Commercial ESG 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 prevent and address human rights impacts, including modern slavery impacts.

While various performance indicators have been included directly within this Statement (these are cross-referenced in the reporting criteria index on page 20), further details of our social and environmental performance, including those relevant to the Reporting Entities, can be found in the Trafigura 2021 Sustainability Report and 2021 Human Rights Report.



2021 Trafigura  
Human  
Rights Report:  
[www.trafigura.com/  
brochure/2021-  
human-rights-report](http://www.trafigura.com/brochure/2021-human-rights-report)

2021 Trafigura  
Sustainability Report  
[www.trafigura.com/  
2021SR](http://www.trafigura.com/2021SR)

# 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>3</sup>

In the reporting period, the Group hosted two multi-stakeholder forums that covered human rights, including modern slavery-related topics of direct relevance to the Reporting Entities (see below).

<sup>3</sup> The key stakeholders with which we engage are listed here: [www.trafigura.com/sustainability/key-stakeholders](https://www.trafigura.com/sustainability/key-stakeholders)

## Multi-stakeholder forum on responsible sourcing and just transition

In June 2021, Trafigura held a multi-stakeholder forum in collaboration with the Global Business Initiative on Human Rights (GBI) to seek stakeholder input on Trafigura's strategy for advancing the transition to a green economy responsibly, including with respect to human rights. See the Trafigura 2021 Human Rights Report for further information.

## Trafigura collaborates with the World Business Council for Sustainable Development and GBI to support the identification of salient impacts

In September 2021, Trafigura participated in a virtual workshop hosted by the World Business Council for Sustainable Development and GBI, in which Trafigura presented the Group's operational activities, including those of the Reporting Entities, and its approach to human rights, and invited feedback from participants on Trafigura's identification of human rights risks. See the Trafigura 2021 Human Rights Report for further information.

2021 Trafigura Human Rights Report: [www.trafigura.com/brochure/2021-human-rights-report](https://www.trafigura.com/brochure/2021-human-rights-report)





# Future actions

We recognise that we need to continually improve our response to modern slavery risks.

In FY2022, we aim to work in collaboration with the Trafigura Group 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.
- **Extension of responsible sourcing diligence:**  
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.
- **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 the Reporting 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 our appreciation for and response to salient impacts across our value chain, including those related to modern slavery.



Tan Chin Hwee (Chen Jinghui), Director of TPTE

31 March 2022

# 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.	Scope and disclosure notes (inside front cover)
As above.	Describe the reporting entity's structure, operations and supply chains.	Structure, operations and supply chains (pages 3-5)
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 this 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.	Identifying modern slavery risks (pages 6-7)
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 on 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.	Actions to assess and address modern slavery risks (pages 9-15)
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.	Assessing effectiveness (pages 12, 14-16)
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.	Consultation with owned and/or controlled entities (inside front cover)
N/A	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Engagement and collaboration (page 17); future actions (page 19)





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