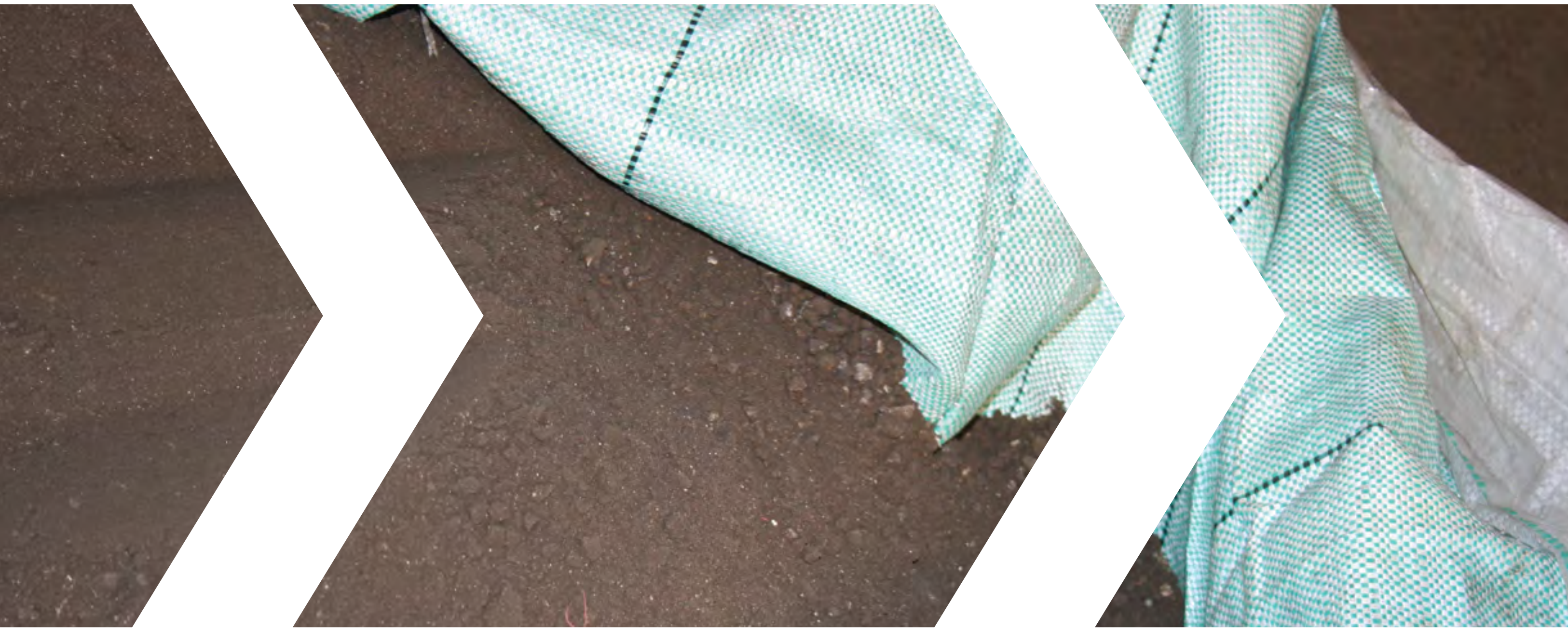
CONFLICT MINERALS DUE DILIGENCE ANNUAL REPORT 2014 SUMMARY

TRAFIGURA METALS & MINERALS TRADING DIVISION



HSEC APPROACH

INTRODUCTION

This annual report covers Trafigura's due diligence programme for 'conflict minerals': tin, tantalum, tungsten and gold (3TG) .

Trafigura's conflict minerals due diligence programme is part of the company's commitment expressed in its Health, Safety, Environment and Communities (HSEC) Policy (click here) and HSEC Business Principles (click here) to respect human rights and contribute to the long-term social and economic development of the local communities affected by, and associated with, the company's tin trading activities.

Trafigura is not an SEC issuer and as such not directly subject to Dodd-Frank 1502, nevertheless, as a purchaser and trader of tin, Trafigura has adopted a proactive and reactive due diligence programme on tin, tantalum, tungsten and gold (3TG) supply chains from high-risk countries to ensure its activities do not directly or indirectly contribute to armed conflict and serious human rights abuses.

At the time of writing Trafigura did not trade in tantalum, tungsten or gold.

The main objectives of Trafigura's due diligence programme are as follows:

1. To comply with regional and international, extraterritorial, legislation, in particular the Regional Certification Mechanism (RCM) of the International Conference on the Great Lakes Region (ICGLR) and Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act (DF1502);
2. To comply with market demands for transparent and traceable 3TG material and in particular the audit requirements of the Conflict Free Smelter Programme (CFSP) through Trafigura's membership in and exclusive sourcing of tin from the ITSCI (ITRI Tin Supply Chain Initiative) programme;
3. To mitigate risks to brand reputation through association with armed conflict, serious human rights abuse, forced or child labour practices.

PROGRAMME DESIGN

Trafigura's conflict minerals due diligence programme is designed to be in conformance in all material aspects with the internationally recognized OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG). The due diligence programme is also aligned with Trafigura's HSEC Policy and Business Principles with a view to embedding Trafigura Group's broader vision of responsible business practices.

The conflict minerals programme is risk based, with increased due diligence being carried out on 3TG sources in high-risk countries. High-risk countries for the first phase of the due diligence programme are those defined as 'Level 1' or 'Level 2' countries by the Conflict Free Sourcing Initiative's (CFSI) Conflict Free Smelter Programme (CFSP)[1].

Trafigura applies a three-step evaluation for all 3TG purchases to determine appropriate due diligence measure. Please refer to Figure 1 below.

FIGURE 1: TRAFIGURA'S CONFLICT MINERALS DUE DILIGENCE PROGRAMME

1
STANDARD 'KNOW YOUR COUNTERPARTY' CHECKS

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2
EXPANDED DUE DILIGENCE FOR 3TG ORIGINATING IN HIGH-RISK COUNTRIES

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3
INDEPENDENT THIRD-PARTY ASSESSMENTS

1 The definition of Level 1, 2 and 3 countries are based on the following documents: CFSP Supply Chain Transparency Audit Protocol for Tin and Tantalum, Revision of 21 November 2013; CFSP Supply Chain Transparency Audit Protocol for Tungsten, Revision of 22 November 2013 and DRAFT CFSP Supply Chain Transparency Audit Protocol for Gold, Revision of 14 April 2014.

PROGRESS REPORT

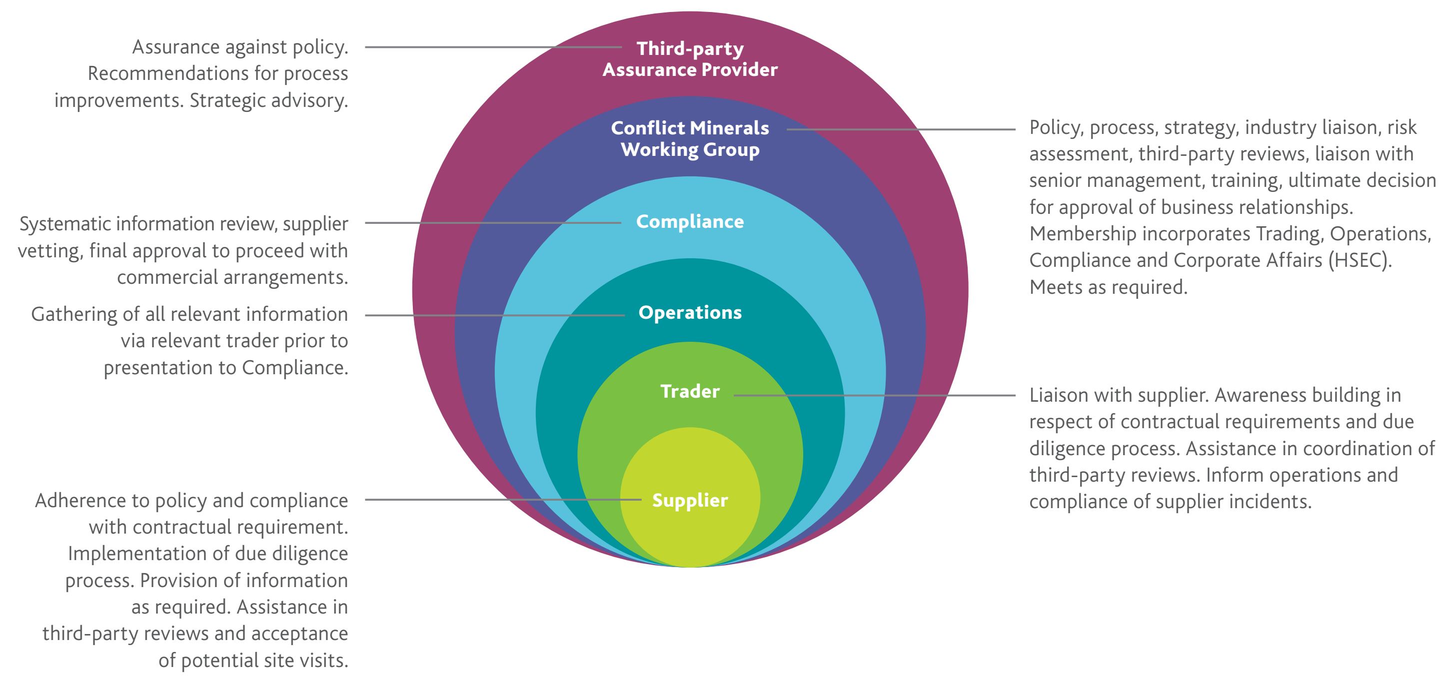
The following activities were carried out by Trafigura over the period of October 1st, 2013 to September 30th, 2014 in conformance with Trafigura's financial year and the five-step process.

OECD STEP 1

ESTABLISH STRONG COMPANY MANAGEMENT SYSTEMS

- Trafigura defined a clear Conflict Minerals Policy, based on the model policy of Annex II of the OECD DDG in collaboration with key internal stakeholders including: Trafigura's Trading, Operations, Compliance and Corporate Affairs personnel.
- Communicated the Policy to relevant stakeholders internally and externally including making it freely available online on Trafigura.com (click here)
- Formalised the due diligence approach in an internal Due Diligence (DD) Guidance Document. The DD Guidance includes the definition of key concepts such as "high-risk countries", describes the three step due diligence approach as it applies to mechanised or artisanal mining as well as to low- or high-risk countries and includes the responsibilities and competencies of internal stakeholders tasked with the implementation of the programme.
- Clearly defined roles and responsibilities among its team members to ensure the integration of due diligence measures into the company's daily activities. See Figure 2 below.

FIGURE 2



TRAFIGURA RESOURCE

Trafigura has appointed a Conflict Minerals Working Group (Chaired by Trafigura's Deputy Head of Corporate Affairs and a member of the company's global HSEC Steering Group) to oversee the company's conflict minerals and related due diligence programme. The appointment was made so as to ensure that the Officer in charge remains independent from Trading and Operations activities.

The Conflict Minerals Working Group, including representatives from Trading, Operations, and Compliance, meet regularly to conduct the following activities:

- Develop policy and process in response to industry trends, regulatory requirements and/or legislative amends
- Guide implementation of due diligence, and agree targets for implementation
- Examine updates on emerging issues and stakeholder expectations and requirements
- Maintain and review risk logs and management of key risks to integrity of approach and process
- Liaise with CFSI approved certification schemes such as ITSCI
- Instruct third-party due diligence
- Review assurance information and recommend appropriate risk mitigation strategy
- Review supplier performance based on implementation of mitigation strategy and recommend consequent action
- Report regularly to the Head of Metals and Minerals Division on performance
- Recommend to Head of Metals and Minerals Division the need to suspend or terminate agreements
- Provide training/supporting information where required
- Coordinate external reporting with regard to Group HSEC policy and performance.

OECD STEP 2

IDENTIFY AND ASSESS RISKS IN THE SUPPLY CHAIN

- Applying the OECD Due Diligence Policy and Guidance, Trafigura commenced implementation of enhanced "Know Your Counterparty" (KYC) procedures in extension to Trafigura's existing KYC protocols
- In March/April 2014, RCS Global, a specialist consultancy appointed by Trafigura, carried out a first round of third-party assessments of tin suppliers and supply chains in Rwanda and the DRC with a view to gain a more in-depth understanding of suppliers' level of compliance with Trafigura's Conflict Minerals Due Diligence Policy requirements. Assessments were conducted as follows:
  - In accordance with the ISO19011:2002 Standard for management systems audits and RCS Global used a standardised supplier questionnaire to guide the assessment team
  - The objective of the assessments was to review supplier practices, systems, policies and procedures with a view to determine the level of compliance with Trafigura's Conflict Minerals Due Diligence Policy
- Trafigura utilised the following sources of information when assessing operational risks faced over the course of 2013/14:
  - Site visits and supplier discussions by Trading team
  - Meetings by Trading team with local ITSCI representatives
  - Regular conversations with the ITSCI's Head Office
  - Review of ITSCI reports
  - Review of expert analysis from United Nations as well as, for example, NGO reports
  - Regular international and local media review.

Trafigura's Trading team shared information in respect of risks faced with counterparties either by verbal discussion or via emails where potential issues/incidents were raised.

- As evidenced by the enhanced KYC process and the independent third-party assessments, Trafigura faces a number of risks in relation to the sourcing of tin from mine sites in high-risk countries. In particular this concerns sources in the DRC and, to a lesser extent, Rwanda. General risk categories that apply are:
  - General risks associated with the supplier's operations
  - Risks related to serious human rights abuse, child labour or forced labour
  - Risks related to the direct or indirect support to non-state armed actors, private or public security forces
  - Risks related to money laundering
  - Risks related to the legality of suppliers' operations, taxes, fees and royalties.

OECD STEP 3

DESIGN AND IMPLEMENT A STRATEGY TO RESPOND TO IDENTIFIED RISKS

- Following the initial programme development and first round of third-party audits, Trafigura and RCS Global formalised its risk rating as well as established a risk mitigation plan for its tin supply chains from artisanal sources in high-risk countries. The risk matrix applied by Trafigura is fully integrated into the Trafigura Group HSEC risk management methodology and follows the same ranking based on likelihood and severity of each risk.
- Further specific risk mitigation measures based on identified risks included:
  - Increased engagement with, and involvement of, internal stakeholders, in particular members of the Trading team, through regular consultation, communication and training (where required)
  - Active engagement, awareness raising and education of suppliers in high-risk countries on Trafigura's Conflict Minerals Due Diligence Policy and sourcing requirements
  - Promotion of a corporate policy requirement to conduct annual third-party assessments of 30 percent of suppliers in high-risk countries as well as of any new suppliers within a defined period, including the development of improvement plans with each supplier to facilitate ongoing monitoring of progress
  - Increased engagement on a local, regional and international level with Trafigura's external due diligence provider, ITSCI
  - Increased external communication, for example at industry events, to present Trafigura's approach, including lessons learned to benefit other actors sourcing from high-risk countries.

OECD STEP 4

CARRY OUT INDEPENDENT THIRD-PARTY AUDIT OF SUPPLY CHAIN DUE DILIGENCE AT IDENTIFIED POINTS IN THE SUPPLY CHAIN

- Trafigura carried out baseline assessments of key suppliers in high-risk areas using RCS Global as an independent assessor
- In 2014/15, Trafigura intends to carry out further audits of key suppliers in the DRC and Rwanda in line with its policy to audit 30 percent of suppliers on an annual basis

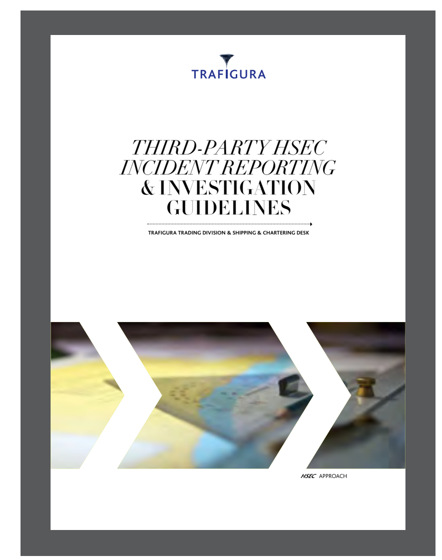
OECD STEP 5

REPORT ON SUPPLY CHAIN DUE DILIGENCE

- Although not required to report under DF1502 on conflict minerals, Trafigura has committed to reporting its due diligence activities on an annual basis on its website.

Grievance mechanism

- In conformance with the OECD DDG, Trafigura provides a whistleblower mechanism for the general public. If stakeholders wish to contact Trafigura with any questions or concerns regarding our due diligence programme they are advised to email the company at HSEC@trafigura.com
- Trafigura's suppliers have been supported by the provision of third-party HSEC incident reporting and investigation guidelines which articulate Trafigura's requirements and recommended best practice in this respect.



DUE DILIGENCE PROGRAMME FUTURE FOCUS

- In line with the OECD DDG vision of due diligence as an ongoing process, RCS Global and Trafigura are in the process of carrying out an annual review of the Conflict Minerals Policy and Due Diligence Guidance so as to integrate lessons learned from previous activities and adjust the due diligence approach to take into account new or emerging industry and regulatory trends.

The activities reported above represent an ongoing programme of work for 2015.

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