



2019 United Kingdom Modern Slavery Act Statement

Background

The United Kingdom Modern Slavery Act 2015 requires companies carrying on a business in the UK, which supply goods or services and have a total annual turnover of GBP36 million or more, to publish an annual statement describing the steps it has taken to ensure that slavery and human trafficking are not occurring in its supply chains or in any parts of its own business.

This statement is made pursuant to section 54 of the Act and constitutes Trafigura Limited's modern slavery and human trafficking statement, as required by the Act, for our financial year ended 30 September 2019.

Scope

Trafigura Limited is a subsidiary of Trafigura Group Pte. Ltd. It is incorporated in England and Wales (Company number: 02737924) and may be within the scope of the UK Modern Slavery Act 2015 (the "Act"). Other subsidiaries do not carry on business, or part of a business, in the UK. Accordingly, they are not subject to the Act and, therefore, are excluded from the ambit of this statement.

The principle activity of Trafigura Limited is the provision of services in consultancy, administration and data collection.

Statement

The services Trafigura Limited provides to its clients are office-based. The large majority of work undertaken is by Trafigura Limited's own staff. Our assessment is that this represents a very low risk of those services being involved in slavery and/or human trafficking.

On the occasions where Trafigura Limited contracts others to assist in the provision of services we take steps to ensure they have any relevant accreditations and are appropriately qualified. Given the nature of these relationships, Trafigura Limited also considers them very low risk and, as such, does not consider any additional steps are required beyond our existing supplier review and approval process.

In 2019, as part of the supplier review and approval process, a periodic re-assessment was undertaken of all service providers ("counterparts") to Trafigura Limited. In summary, it was concluded that all counterparts provide software services, IT maintenance and consulting services. Such activities require highly-skilled workers and, as such, are not typically prone to modern slavery risks.

In conclusion, given the low risk profile of anyone supplying us with services being involved in slavery and/or human trafficking, we believe our current procedures and reliance on regulatory oversight in relation to the provision of services is sufficient.

This statement, which will be reviewed annually and updated as required, has been reviewed by key stakeholders, senior management and has been approved by the Directors of Trafigura Limited.

Signed by Mike Wainwright, Director, for and on behalf of the Trafigura Limited Board of Directors.

30 September 2019.