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 GBP 36 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’s modern slavery and human trafficking statement, as required by the Act, for our financial year ended 30 September, 2018.

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, are not subject to the Act and are therefore 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’s own staff. Our assessment is that this represents a very low risk of those services being involved in slavery and/or human trafficking. As a result of this assessment, Trafigura has not identified a need to take any additional action with regard to such services.

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 also considers them very low risk and, as such, will take no additional steps beyond our existing supplier review and approval process.

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 Mark Irwin, Director, for and on behalf of the Trafigura Limited Board of Directors. 30 September, 2018.

Trafigura Limited’s financial year runs from 1 October to 30 September.