

Trafigura

Corporate responsibility policy



Responsible trade

The following statement sets out the high-level priorities and commitments of Trafigura's Board of Directors in respect of acting responsibly.

Our commitment

As one of the world's leading commodity trading firms, the Trafigura Group is committed to operating its business in a reliable, efficient and responsible way.

As such we will endeavour:

- To comply with applicable domestic and international laws and regulations, as well as our own standards;
- To maintain a healthy and safe working environment based on integrity, equal opportunity and mutual respect;
- To avoid causing or contributing to adverse human rights impacts through our activities, to address such impacts when they occur, and to seek to mitigate adverse social and environmental impacts directly linked to our operations or services;
- To promote our Business Principles amongst our business relationships¹ and encourage them to apply comparable standards;
- To measure and seek to continually improve our human rights and environmental performance through effective management systems implemented across our operations;
- To engage with stakeholders as appropriate in a clear, accurate and objective manner with respect to our business activities and responsibility performance;
- To leverage our experience and expertise to promote a more responsible commodities trading sector;
- To contribute to social and economic development within the communities where we operate.

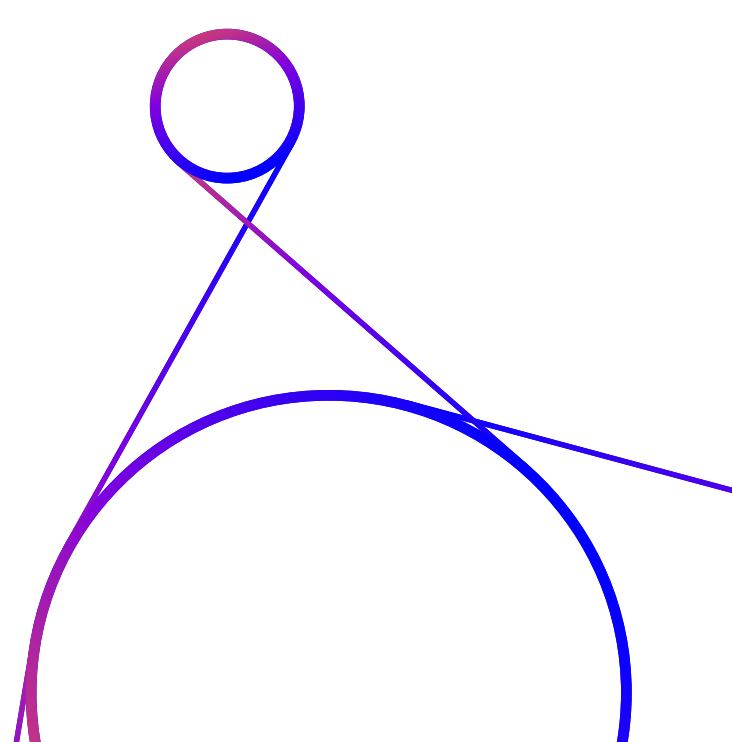
We have set ourselves an important ambition: to become acknowledged sector leaders in the way we manage corporate responsibility.

To deliver on this objective, we shall operate a systematic and rigorous approach to the management of risks to people and the environment associated with our operations and in our selection of contracting partners. In doing so, we are cognisant of the IFC Performance Standards and guided by the principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights.

We have to earn and maintain a social licence to operate in the many countries and communities where we are active. We will seek to provide our partners with the necessary assurance that we operate to high standards.

Demonstrating leadership in corporate responsibility not only means adapting constantly to society's ever-evolving expectations, it also supports the development of our business and enhances our access to capital and liquidity.

¹ Business relationships refer to business partners, entities in our value chain such as contractors and any other non-State or State entity directly linked to our business operations or services. This may include indirect relationships in our value chain and minority shareholding positions in joint ventures.



Business principles

Complemented by our Code of Business Conduct, this Corporate Responsibility Policy is supported by a set of Business Principles.

Our Business Principles present the expectations of Trafigura's Board with respect to how the Group and its divisions and operating companies shall operate and behave in line with our overall goal to operate responsibly.

Scope

Our Corporate Responsibility Policy and Business Principles apply to all Trafigura Group companies and operations over which Trafigura Group Pte. Ltd. has control over the majority of the voting rights.

Each constituent company within the Trafigura Group is expected to supplement the Business Principles with relevant and adequate sector-specific standards and supporting policies and procedures for their day-to-day operations.

We also encourage those we do business with to adopt and implement comparable standards.

Application

Individual managers across the Trafigura Group are accountable for leading and promoting our responsibility approach, providing resources and training for their staff. They are also required to measure and report on their performance on a regular basis.

Our Corporate Responsibility Policy and Business Principles are not a substitute for domestic or international laws and regulations. While the Principles may extend beyond given domestic law, they must not place a Trafigura Group company in a situation where it faces conflicting requirements. When unsure, the most stringent standard should be applied.

Communication

Our Corporate Responsibility Policy and Business Principles are to be promoted to employees across the Group, to business relationships and to stakeholders as appropriate as well as made available on our Corporate website.

Assurance

We will assure compliance with our Corporate Responsibility Policy and Business Principles through periodic assessment of the extent to which they have been effectively implemented across all applicable Group divisions and operating companies.

We will report on progress in implementing our corporate responsibility strategy to Trafigura's Board, and commit to update external stakeholders as appropriate and in Trafigura's annual Corporate Responsibility Report.

Reporting grievances safely, securely, anonymously and with confidence



By phone

Either access our website for a full list of local Freephone numbers or, alternatively, call +44 1249 661808



By email

trafigura@expolink.co.uk



Online

Either visit the Responsibility section of Trafigura's website or go to: <https://wrs.expolink.co.uk/trafigura> followed by access code: 'trafigura'



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We believe that every grievance must be acknowledged, logged and managed consistently and with due respect for the complainant, regardless of whether the relevant Trafigura Group operation considers the issue to be well founded.

Logging and investigating all grievances doesn't mean that they will all be accepted as legitimate complaints. As a point of principle, the responsibility of the Trafigura Group operation to remediate a grievance will be limited to cases where the alleged harm/wrong is caused by the operation or where the operation has contributed to it.

The companies in which Trafigura Group Pte. Ltd. directly or indirectly owns investments are each separate legal entities and should not be considered or construed otherwise. This document refers to: (i) certain subsidiaries over which Trafigura Group Pte. Ltd. has direct or indirect control; and (ii) certain joint venture entities and arrangements where Trafigura Group Pte. Ltd. has direct or indirect joint control; and (iii) certain other investments where Trafigura Group Pte. Ltd. has neither control nor joint control and may or may not have influence. For the avoidance of doubt, references to "Trafigura", "Trafigura Group", "the company", "the Group", "we", "us", "our" and "ourselves" may be used for convenience (not for legal) purposes to refer to Trafigura Group Pte. Ltd., its subsidiaries, and/or its joint ventures.

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