



2020  
MODERN SLAVERY  
STATEMENT

TRAFIGURA PTE. LTD.

*ADVANCING*  
TRADE

# Scope and disclosure notes

This Modern Slavery Statement ('Statement') is made by Trafigura Pte Ltd ('TPTE') ('the reporting entity') for the purposes of the Australian Modern Slavery Act 2018 (Cth) ('Australian MSA') and United Kingdom Modern Slavery Act 2015 ('UK MSA') for the financial year 1 October 2019 to 30 September 2020 (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). 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 and its owned and/or controlled entities, in general.

This Statement was approved by the Board of TPTE on 31st March 2021 and has been signed by Tan Chin Hwee (Chen Jinghui), Director (see page 15).

## Consultation

In preparing this Statement, we have consulted with centralised functions within or which support TPTE, namely Corporate Responsibility, HSEC, Compliance and Legal, through discussions relating to modern slavery risks, implementation of relevant Trafigura policies and processes within TPTE and its owned and/or controlled entities and direct input into this Statement.

## Contents

---

<b>Our human rights commitment</b>	<b>2</b>
<hr/>	
<b>Structure, operations and supply chains</b>	<b>3</b>
Overview of TPTE's structure and operations	4
Overview of TPTE's supply chains	5
<hr/>	
<b>Identifying modern slavery risks</b>	<b>6</b>
Modern slavery risk areas	7
<hr/>	
<b>Actions to assess and address modern slavery risks</b>	<b>8</b>
Policies and Guidelines	8
Our due diligence processes	9
Know your Counterparty	9
Responsible Sourcing Programme	10
Health, Safety, Environment and Community (HSEC) contractor due diligence	12
HSEC assurance	12
Awareness raising and training	12
Grievance mechanisms and remediation	12
<hr/>	
<b>Assessing Effectiveness</b>	<b>13</b>
<hr/>	
<b>Future actions</b>	<b>15</b>
<hr/>	
<b>Reporting criteria index</b>	<b>16</b>

# Our human rights commitment

We recognise the impacts of our activities, both positive and negative, on people and the environment, and the importance of acting responsibly at all times. A number of policies and guidelines apply to how we do business and include commitments to endeavour to avoid causing or contributing to adverse human rights impacts, to seek to address such impacts when they occur, and to seek to mitigate adverse social and environmental impacts directly linked to our operations or services.

We recognise that businesses can impact human rights through causing, contributing to or being directly linked to modern slavery through their operations and business relationships. 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.

Taking action to address modern slavery risks supports our responsibility to respect human rights, aligns with our values and is key to our ability to earn and maintain a social licence to operate.

We also recognise that addressing modern slavery requires collective action from Governments, businesses, and civil society. We are committed to engaging constructively with regulators, business peers, customers, suppliers, civil society and other stakeholders to support global action to combat modern slavery and to continue to work to strengthen our approach.



# 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. 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.



## Overview of TPTE's structure and operations

The Trafigura Group includes a diverse range of global entities.

TPTE is one of Trafigura's international commodities trading companies. It is headquartered in Singapore and employs around 921 people across five offices located in five countries, all of whom are permanent and in professional roles.

As a trading entity, TPTE's operations focus on sourcing, storing, blending and delivering physical commodities at all stages of the supply chain, including oil and petroleum products, and metals and minerals. TPTE also trades and invests in power and renewable energy.

TPTE also 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 our 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 refinery: an entity which owns a refinery, which transforms 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.

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 terminals and/or refineries;
- port operations;
- shipping and bunkering;
- mining, extractives and smelting;
- railway logistics; and
- agriculture.

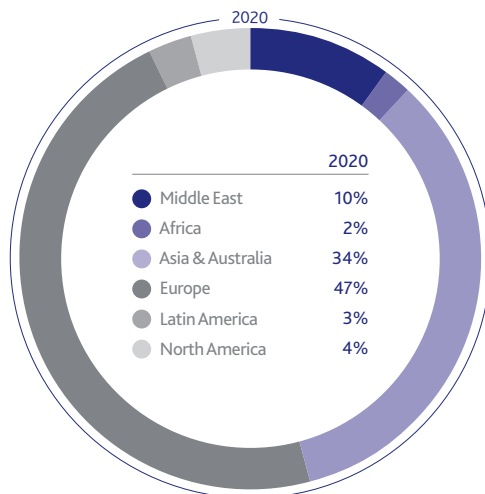
TPTE's owned and/or controlled entities and its investments and joint ventures operate in a number of locations around the world with varying inherent modern slavery risks from low to high.



## Overview of TPTE's supply chains

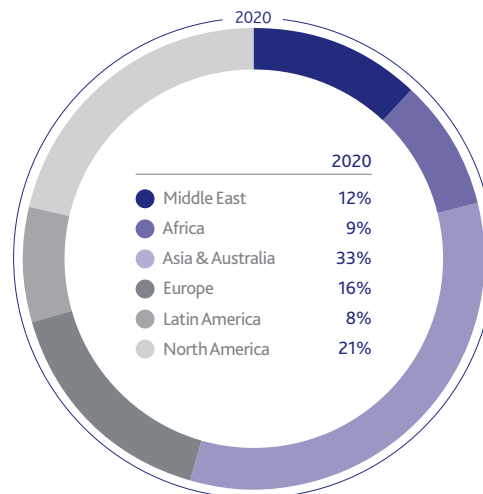
### Oil and Petroleum Products

procurement spending by geography (%)



### Metals and Minerals

procurement spending by geography (%)



Due to the trading-focused nature of our business, TPTE has extensive global supply chains.

The main types of goods and services TPTE procures as part of its 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.
- Services to support the storage and transformation of commodities, such as land or floating storage for petroleum products.
- Logistics, shipping and other chartering services to transport and deliver commodities, including ships and barges.

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 TPTE's commodity trading team.

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

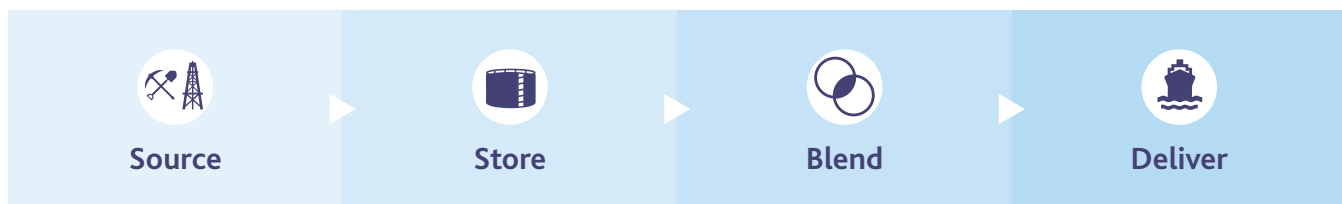
TPTE's activities are technically complex and geographically dispersed. We recognise that the nature and extent of our global activities and the commodities we trade may expose TPTE and its owned and/or controlled entities to areas of modern slavery risk. We have policies and processes in place to assess and address these risks.

## Mapping our salient human rights risks

Actual and potential adverse impacts that we could cause, contribute to or be directly linked to, either through our

own activities or as a result of our business relationships are identified and assessed. This process involves, *inter alia*, consultation with potentially affected groups and other relevant stakeholders.

Through this process, a range of salient human rights risks (those risks that could have the most severe impacts on rightsholders) have been identified, which includes risks relating to the responsible sourcing of products, seafarers' rights, union recognition and labour rights, and access to grievance mechanisms.



Example issues that could be faced by a company such as TPTE and its owned and/or controlled entities directly or indirectly, e.g. via its business relationships.

## Industrial operations

### Recruiting workers in sectors with high modern slavery risks

Risks may be heightened by periods of high demand for short-term and lower-skilled labour. The use of temporary labour may involve particular modern slavery risks such as debt bondage or human trafficking. Poor recruitment practices may contribute to modern slavery risks.

### Investing in joint venture activities or other investees involved in modern slavery

Risks may be heightened where joint venture and investee entities operate in regions where there is poor rule of law, current or past conflicts, and/or limited protection of labour and other human rights.

## Supply chains

### Sourcing commodities that may be produced using modern slavery

Production and/or onward sale of a commodity may contribute to, benefit from, or result in the commission of serious human rights abuses. Suppliers often have large supply chains and may have little incentive or ability to tackle exploitation in the production and/or delivery of goods and services, including within their own supply chains.

### Storing, blending or refining commodities using services involving modern slavery

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/or limited protection of labour and other human rights. Unhealthy and unsafe working conditions may infringe on the rights of workers and community members to the highest attainable standard of health and to just and favourable conditions of work.

### Delivering commodities using services involving modern slavery

The transport and delivery of commodities by ship, road or rail throughout the value chain may involve workers at risk of exploitation. Unsafe practices may impact right to life with a disproportionately negative effect on vulnerable groups.

## Procurement

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

Risks may be heightened in relation to particular goods and services including maintenance and construction products and services; security and facilities management services, such as catering and cleaning; PPE and uniforms; logistics and delivery services; and vehicles and machinery. Use of labour hire agencies including for shipping crews and at assets such as mines may involve modern slavery risks relating to the use of temporary and lower-skilled workers.

### Procuring office products and services provided or produced using modern slavery

Procurement of facilities and associated services such as cleaning, maintenance, catering and security, can involve higher modern slavery risks, including as a result of 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, PPE, and other products, which can involve complex and fast moving global supply chains.

## Grievance mechanisms

### Access to grievance mechanisms

Failure to provide adequate access to grievance mechanisms and corresponding remedy could compromise the ability of affected individuals and/or communities suffering modern slavery to express concerns and infringe on the right to just and favourable conditions.



## Modern slavery risk areas

This section outlines six modern slavery risk areas in the operations and supply chains of TPTE and its owned and/or controlled entities<sup>1</sup>. The policies and processes we have 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 have their own supply 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 rightsholders in global supply chains, including in the shipping industry, raw material supply chains and other sectors involved in supporting commodity trading. Further information on our response to the COVID-19 pandemic is set out on page 13.

### Risk area

#### Operations

##### **Recruiting workers in sectors with high modern slavery risks:**

TPTE and its owned/or controlled entities employ large numbers of staff in a wide range of countries and in diverse roles. Overall, we believe there is a low risk that our employees may be exploited by modern slavery due to our employment controls and processes, as well as the majority of our 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 our supply chains 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 and metals and minerals storage and logistics. These joint venture activities and investments can involve entities that operate 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. We recognise that these sectors can involve a range of modern slavery risks, such as recruitment of exploited workers. TPTE also holds interests in entities involved in fund management and investments.

#### Supply chains

##### **Sourcing commodities as part of trading activities that may be produced using modern slavery:**

TPTE and its owned and/or controlled 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 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, refining and delivery 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 transport and delivery of commodities by ship, road or rail throughout the value chain may also involve workers at risk of exploitation. This includes the transport and delivery of commodities by suppliers to TPTE and its owned and/or controlled entities, as well as the transport and delivery of commodities from TPTE and its owned and/or controlled entities to customers.

##### **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; PPE 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, PPE, and other products, which can involve complex and fast moving global supply chains.

<sup>1</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 and its owned and/or controlled entities and is not intended to provide a comprehensive listing of all modern slavery risks.

# Actions to assess and address modern slavery risks

We are committed to progressing responsibility standards in commodities trading and identifying and mitigating salient health, safety, social (including human rights) and environmental risks. Consistent with this commitment, we have taken a range of actions that 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 and have leverage in our relationship with a business partner, we seek to influence their behaviour. In some cases, however, we have limited leverage to influence the actions of other parties in our operations and supply chains, including where we have short-term or small scale relationships with our trading partners or suppliers. The blending and refining of commodities we trade, such as oil and metals, can also limit our ability to trace these materials to source.

## 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 our management of human rights, including modern slavery risks, are described below.

### Code of Business Conduct

The high standard of behaviour we expect from all of our employees is enshrined in the Group's Code of Business Conduct (the Code) which is based on international standards. Every member of staff must attest to receiving, understanding and complying with the Code, which sets out expected behaviours in all our business activities. All management teams are charged with promoting these behaviours. They are supported by our Compliance department.

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

### Corporate Responsibility Policy

This policy sets out the high-level priorities and commitments of Trafigura's Board of Directors with respect to acting responsibly. It explains that we will endeavour 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. Together with our Business Principles (see below), the Corporate Responsibility Policy is promoted to our employees, business partners, and to stakeholders as appropriate, as well as made available on Trafigura's website.

[www.trafigura.com/brochure/trafigura-corporate-responsibility-policy](http://www.trafigura.com/brochure/trafigura-corporate-responsibility-policy)

### HSEC Business Principles

These 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. Among other things, 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.

[www.trafigura.com/brochure/trafigura-hsec-business-principles](http://www.trafigura.com/brochure/trafigura-hsec-business-principles)

Each 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.

### Trafigura HSEC Contractor Screening and Management Process

This guidance document has been developed to promote consistency in the manner in which contractors are engaged globally with respect to HSEC matters, but to allow informed and localised response to risks.

[www.trafigura.com/brochure/trafigura-hsec-contractor-screening-and-management-process](http://www.trafigura.com/brochure/trafigura-hsec-contractor-screening-and-management-process)

### Metals & Minerals: Responsible Sourcing and Supply Chain Expectations

The Metals & Minerals: Responsible Sourcing and Supply Chain Expectations (the Expectations) sets out expectations for suppliers and how we support implementation of these expectations. The Expectations clearly state that suppliers 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.

[www.trafigura.com/brochure/responsible-sourcing-and-supply-chain-expectations](http://www.trafigura.com/brochure/responsible-sourcing-and-supply-chain-expectations)

In support of the Expectations, we undertake risk-based due diligence on our supply chains focusing on those activities in our supply chains where risks to people and the environment are greatest. We also engage with suppliers to develop policies and procedures in line with these expectations and promote the dissemination and adoption of similar standards across the supply chain.

## Our due diligence processes

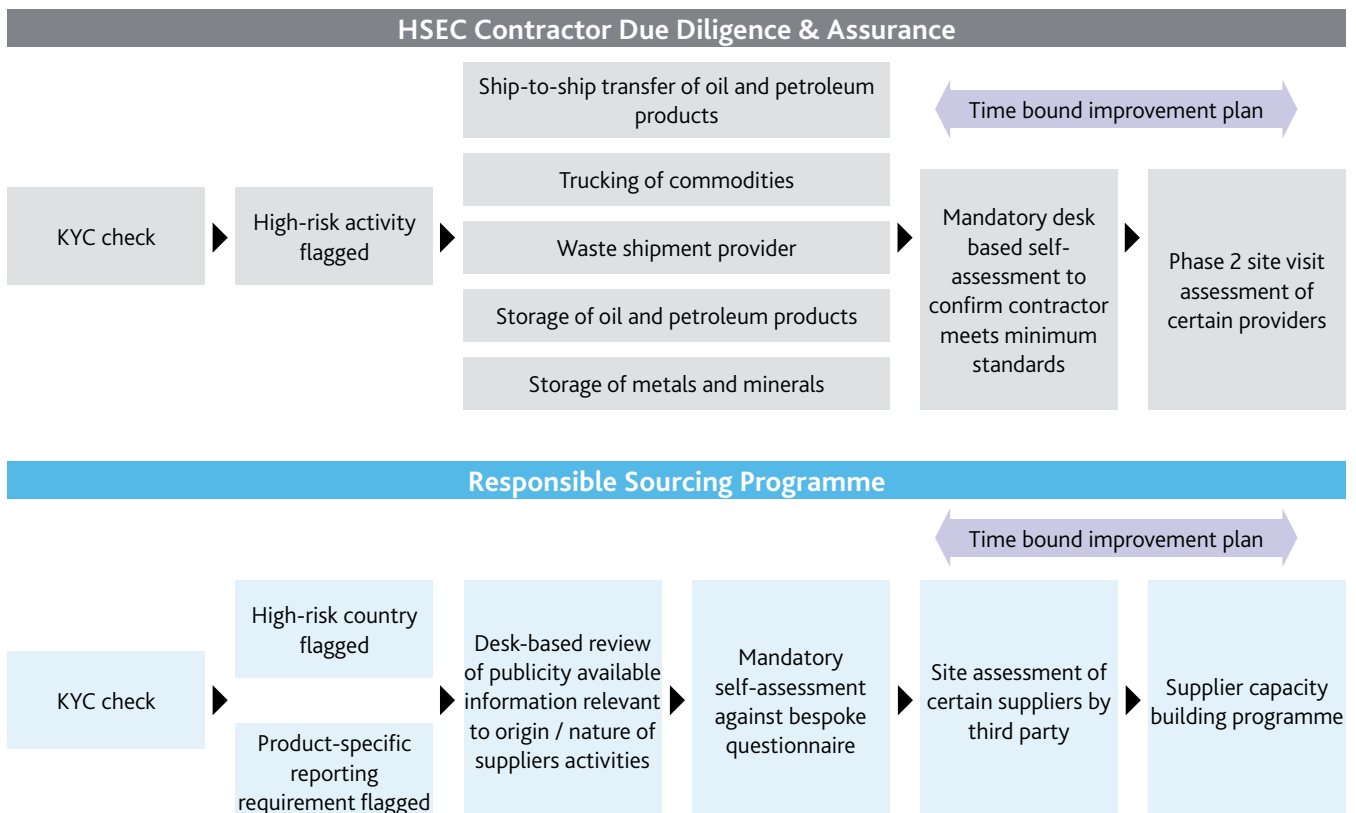
We have three key due diligence processes in relation to our counterparties including contractors, which focus on identifying and prioritising those activities in our supply chains where risks to people and the environment are greatest.

- **Know your Counterparty (KYC)** checks using World Check to screen trading counterparties and contractors for compliance risks;
- **Responsible Sourcing Programme** which assesses our counterparties for all metals and minerals traded in concentrate and semi-refined form for a range of risks including human rights; and
- **HSEC Contractor Due Diligence and Assurance** which assesses contractors providing certain services for a range of risks focused on health, safety and environmental impact.

## Know your Counterparty

Under our KYC process, all of our trading counterparties and service contractors are screened through World Check for risks relating to corruption, money laundering and other compliance issues, as well as for sanctions and for negative media reports. Given the nature of our trading business, trading counterparties are screened for compliance on a daily basis and certain high risk counterparties are also rescreened daily for negative media coverage. If particular issues of concern are identified, these are escalated internally.

## Our due diligence process in summary



## Responsible Sourcing Programme

We have identified that the extraction, handling, processing, transportation and trade of metals and minerals have particular environmental, social and governance risks including human rights 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 our Responsible Sourcing Programme.

Our Responsible Sourcing Programme is aligned with the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the OECD Guidance) and other key international standards, including the UN Guiding Principles on Business and Human Rights. It has three main goals:

- To identify and mitigate risks to people and the environment
- To engage with those impacted and promote positive outcomes
- To report transparently and provide assurances where required

The Responsible Sourcing Programme involves desk-based research and supplier self-assessment questionnaires (including specific questions in relation to labour practices). Certain suppliers considered high risk based on these steps are then subject to a site-based assessment (this includes interviews with workers and others). We then monitor and follow up with suppliers, and where appropriate provide assistance to support their mitigation activities. The process is elaborated on the opposite page.

Due diligence on suppliers of higher risk materials including gold, platinum, silver and cobalt, and suppliers from specified high risk countries, is conducted prior to contracting. For suppliers of other base metals, due diligence is conducted each year.

In 2020, Trafigura's Responsible Sourcing Programme was reviewed. This included a review of the programme's

overarching vision and underlying commitments. As part of this revision, an expert third party conducted a detailed risk assessment to evaluate risk from the perspective of the social and/or environmental risks that products pose during their transformation phase (i.e. as the material is transformed from, for example, ore to semi- or fully-refined form) or when that material is in its finished form. From a human rights perspective this included risks relating to artisanal and small-scale mining or production which is often associated with modern slavery risks. We are working to embed responses to these findings in our programme.

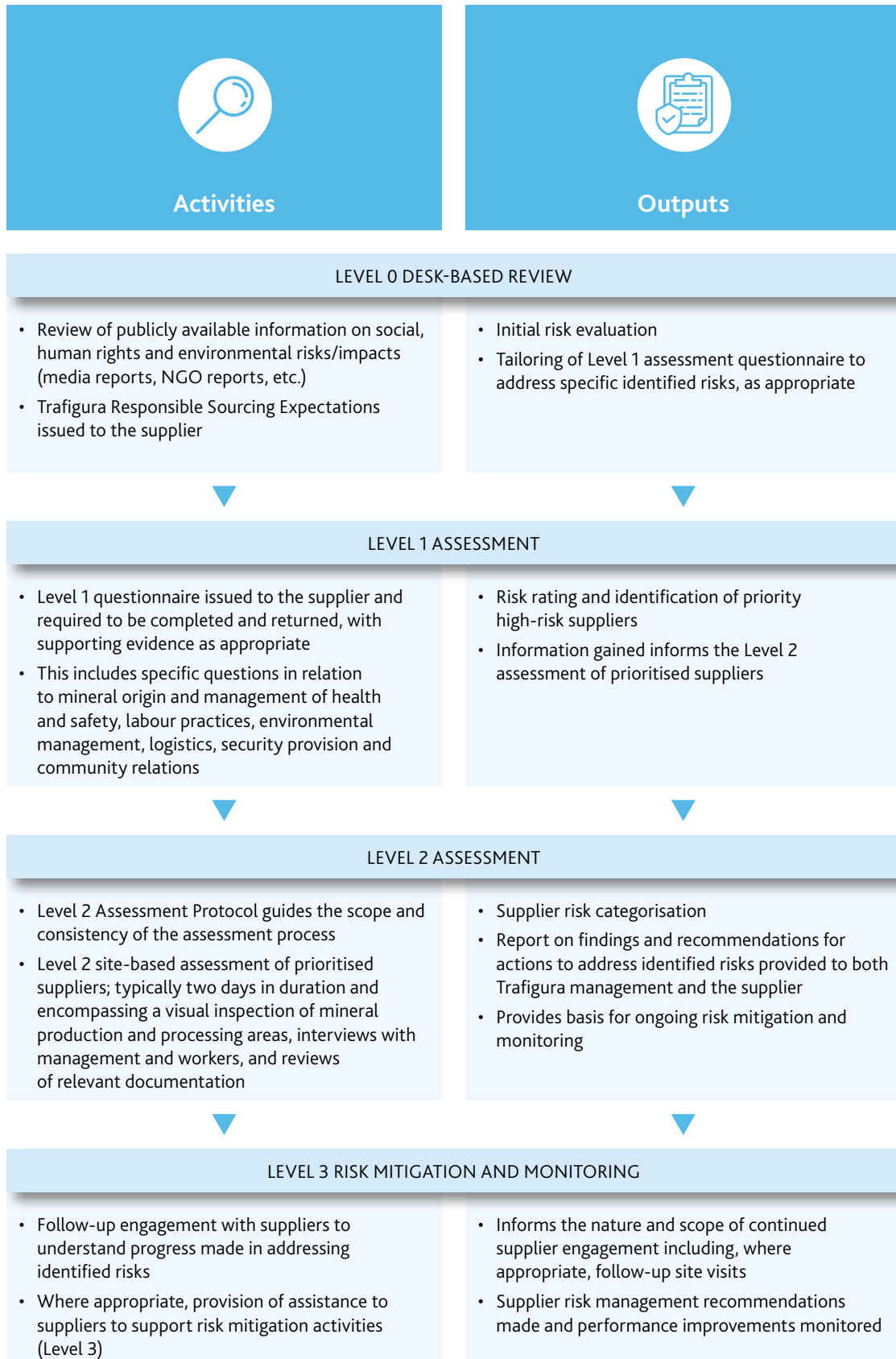
The Responsible Sourcing Programme was also extended to all metals and minerals traded in concentrate and semi-refined form, from point-of-origin to point-of-sale, taking into account the relevant risks to people and the environment across the value chain. For the avoidance of doubt, in the context of refined metals, point-of-origin is the smelter or refinery (as applicable).

During the year, we also formalised our approach to the identification of conflict affected and high-risk areas in line with the OECD Guidance and London Metal Exchange Responsible Sourcing requirements. As a result, risk determination is now facilitated by:

1. A country risk assessment tool developed by the Responsible Minerals Initiative (RMI) whereby conflict affected and high risk areas are systematically flagged by the RMI and latterly integrated into our supplier screening process; and
2. Through customer feedback whereby we may, for example, instruct diligence on a specific asset or product flow following a request for information from a counterparty.

Where we identify a significant human rights risk in relation to a metals or minerals supplier, we may seek to include a specific clause in our contract with such supplier which requires acknowledgement of our human rights commitments, agreement to support our due diligence efforts, and a right to conduct site inspections.

## Supply chain due-diligence steps



### HSEC contractor due diligence

Contractors who provide particular activities considered high risk from a HSEC perspective, including ship-to-ship transfers, trucking, bulk storage and disposal of liquid waste from vessels, are assessed through a two-phase due diligence process.

The first phase involves desk-based due diligence which seeks to confirm its ability to meet minimum HSEC expectations, including whether it has competent staff, sound maintenance procedures and the necessary equipment to perform safely. Contractors that pass the desk-based HSEC assessment may then receive an on-site inspection within a set timeframe. Contractors that fail due diligence but are willing and able to work to upgrade their processes can gain temporary approval for an interim period. Those that are unable or unwilling to improve are rejected.

### HSEC assurance

To meet the Group's HSEC Business Principles, an assurance process was put in place, which ranks the ability of all installations and facilities to meet those principles, including the commitment to human rights. The process includes TPTE.

The risk rating is based on three components. First the inherent risk associated with the environmental, social and economic setting of the asset is considered. Secondly, the operations being conducted at the facility are rated, with more hazardous activities ranked higher. The third component of the risk assessment is its operational performance.

A tiered approach has been adopted which makes a distinction between assets directly controlled and those under joint venture or similar structures in which influence may be achieved through applicable corporate governance rules.

The assessment process takes account of all of these factors to categorise every fixed location facility low risk to high risk, which in turn, informs the contractor management and HSEC assurance processes.

The structured approach to assurance has aligned site-based assurance with the perceived risk status of operational locations and activities, and allowed more assessments to be completed. Specific assurance protocols have been introduced for contractors, suppliers and potential merger and acquisition counterparties.

### Awareness raising and training

We also require new and existing employees to complete mandatory online compliance training, which includes a module on our Code of Business Conduct, as well as modules focused on addressing practices such as bribery, corruption and money laundering, which may increase modern slavery risks.

New employees are also provided access to corporate responsibility training which includes an overview of our human rights commitments.

### Grievance mechanisms and remediation

We encourage the identification and escalation of issues relating to TPTE and its owned and/or controlled entities that may negatively impact its operations or reputation, the wellbeing of employees or our communities.

Internationally, we have deployed EthicsPoint, an anonymous 24/7 multilingual telephone hotline and web reporting service provided by NAVEX Global to facilitate the reporting of grievances. Our criteria for accepting a grievance are broad and flexible in order to accommodate as wide a range of grievances as possible and the service is available to all internal and external stakeholders.

EthicsPoint is promoted via a number of channels including on the Trafigura Group website. Issues and grievances can be raised anonymously, with full confidentiality preserved throughout the process. Procedures are in place to avoid any real or perceived conflicts of interest during investigations and in our response. This is supported by a formal appeal procedure.

At an operational level, all major installations are also required to maintain a grievance process.

No allegations of modern slavery were raised through our grievance mechanisms during the reporting period, although we acknowledge that this does not mean that no modern slavery was present in our operations or supply chains.

### **CASE STUDY: COVID-19 AND MODERN SLAVERY RISKS FOR VESSEL CREWS**

One group that has been particularly impacted by COVID-19 is the crew of vessels, who have not been able to rotate home as normal. This may increase their vulnerability to forms of modern slavery such as forced labour.

Although we do not employ crews directly, we have worked with those that crew the vessels we own and charter, to help minimise the impacts and hardship. Crew members who are unable to rotate off the vessels are paid a supplementary bonus. Also, we have arranged for vessels to make unscheduled stops in rotation-friendly ports to allow crews to disembark and rotate, and have lobbied ports where we have influence, such as Singapore, to facilitate the travel of crews through their jurisdictions.

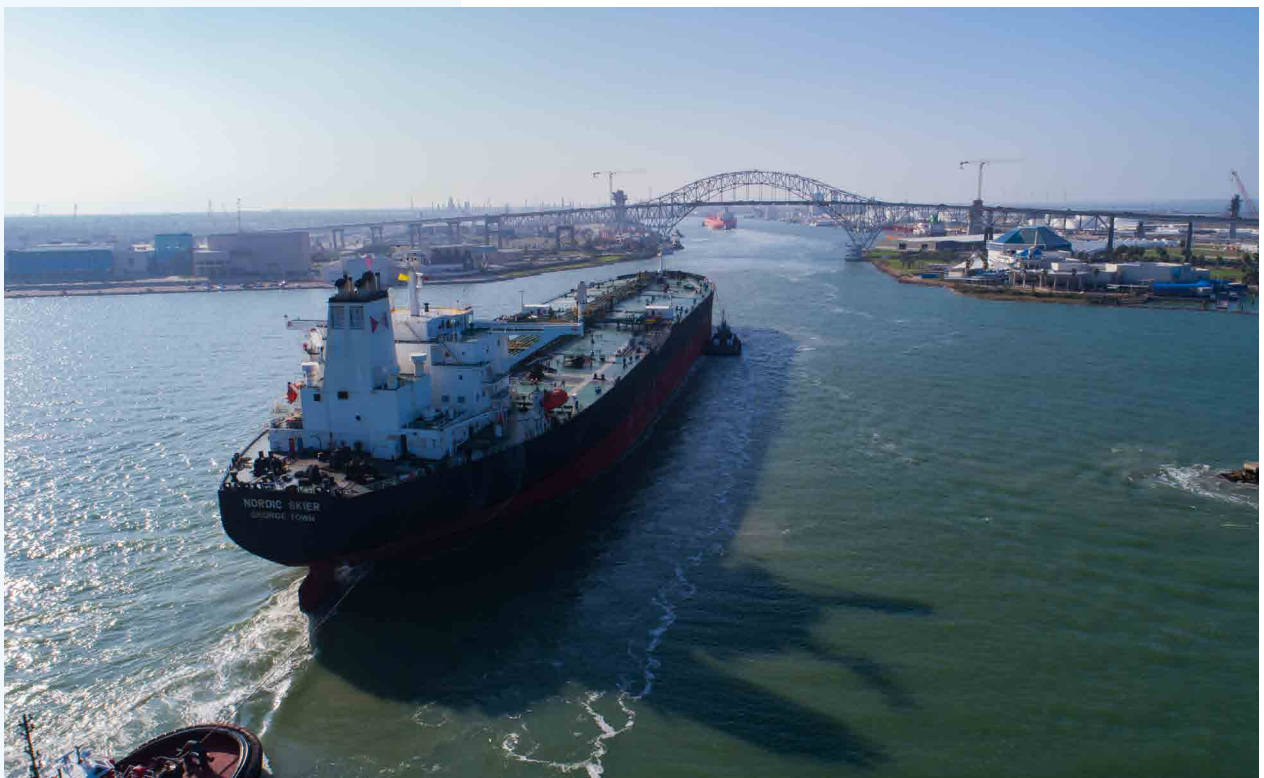
### **Assessing effectiveness**

We recognise the importance of assessing the effectiveness of actions taken to prevent and address human rights impacts, including in relation to modern slavery.

Our human rights and environmental performance is measured and we seek to continually improve our human rights and environmental performance through effective management systems implemented across our operations. Actions are monitored and assessed to prevent and address human rights impacts, including modern slavery. For example:

Our position on the Responsible Sourcing Programme was reviewed in 2020 and the scope of due diligence was revised to extend to cover all metals and minerals traded from point-of-origin to point-of-sale. For the avoidance of doubt, in the context of refined metals, point-of-origin is the smelter or refinery (as applicable).

The Group seeks feedback on its approach to human rights through multi stakeholder and other stakeholder engagement. In 2020, stakeholders identified the responsible sourcing of metals and minerals as an area of particular importance.







## Future actions

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

In 2021, we aim to work in collaboration with the Trafigura Group to:

- host two multi-stakeholder forums in key operational and strategic locations in 2021 (subject to COVID restrictions);
- specifically incorporate the issue of modern slavery into our engagement with relevant external stakeholders to build our understanding of risks and leading approaches to address risks;
- make corporate responsibility training, which includes an overview of our human rights commitments, mandatory for all new employees;
- progress work to align fully our Responsible Sourcing Programme with the relevant requirements of the externally verified ISO 20400:2017 standard by 2023;
- conduct further assessment of our modern slavery risk areas focusing initially on those considered highest risk; and
- explore gaps in our existing policies and processes in relation to assessing and addressing modern slavery risks and potential actions to address those.



Tan Chin Hwee (Chen Jinghui), Director of TPTE  
31 March, 2021

# 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.
As above.	Describe the reporting entity's structure, operations and supply chains.	Structure, operations and supply chains.
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 that 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.
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 about 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.
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.
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.	Scope and disclosure notes.
N/A	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Future actions.





**Trafigura Pte. Ltd.**

10 Collyer Quay #29-00  
Ocean Financial Centre  
Singapore 049315  
Email: [enquiries@trafigura.com](mailto:enquiries@trafigura.com)

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

TK/0365.1e  
March 2021

