

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	Trafigura
Sector	Commodity trading
Headquarters	Singapore, Singapore
Type	Privately owned
Date of submission to company (month/year)	January 2026
PREAMBLE <i>MSG Participation</i>	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	DEMOCRATIC REPUBLIC OF THE CONGO
Secretariat comment on MSG participation	<p>The Secretariat acknowledges Trafigura’s proactive efforts to join the multi-stakeholder group (MSG) in Zambia and recognises its participation as an observer in the DRC.</p> <p>The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.</p>
EXPECTATION 1 <i>Public support for the EITI</i>	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>

Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	<p>Payments to Governments Report 2024: https://www.trafigura.com/news-and-insights/publications/responsibility/2024/2024-sustainability-report/2024-payments-to-governments-report/</p> <p>Performance and Engagement Webpage: https://www.trafigura.com/sustainability/performance-and-engagement/</p> <p>EITI Collaboration Webpage: https://www.trafigura.com/news-and-insights/case-studies/performance-and-engagement/trafigura-collaborates-with-eiti/</p>
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Trafigura publishes a statement of support. See URLs.
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	<p>Annual Report Landing Page: https://www.trafigura.com/news-and-insights/publications/financials/2024/2024-trafigura-annual-report/</p> <p>Annual Report 2024: https://www.trafigura.com/media/svxjrm1/2024_trafigura_annual_report.pdf</p>
EITI implementing countries where the company operates.	<p>COLOMBIA</p> <p>DEMOCRATIC REPUBLIC OF THE CONGO</p> <p>PERU</p>

Does the company make disclosures in accordance with the EITI Standard or in relation to EITI implementing countries?	Yes
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	List of controlled subsidiaries published. See URL p.139. Company assessed as making disclosures in accordance with EITI Standard.
EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i>	<i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	2024 Payments to Governments Report: https://www.trafigura.com/media/v1ibuu4a/25_payments-to-governments.pdf ESTMA Report 2024: https://www.trafigura.com/news-and-insights/publications/myra-falls-mine/reporting-entity-information-myra-falls-mine-2024/
Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met

<p>Secretariat comment</p>	<p>Trafigura discloses taxes and payments to governments in non-EITI implementing countries. See URL.</p> <p>The company discloses taxes and payments to governments disaggregated project. See URLs, including ESTMA Report 2024.</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
<p>EXPECTATION 4 <i>Commodity trading transparency</i></p>	<p><i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i></p>
<p>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</p>	<p>Yes</p>
<p>If yes, which countries?</p>	<p>ANGOLA COLOMBIA ECUADOR INDONESIA MALAWI MONGOLIA MOZAMBIQUE PERU REPUBLIC OF THE CONGO TANZANIA ZAMBIA</p>
<p>Does the company make disclosures in line with the EITI Standard and reporting guidelines?</p>	<p>Yes</p>

URL for disclosure(s)	<p>Payments to Governments Report 2024: https://www.trafigura.com/news-and-insights/publications/responsibility/2024/2024-sustainability-report/2024-payments-to-governments-report/</p>
Secretariat's assessment on Expectation 4	Expectation met
Secretariat comment	<p>Trafigura buys oil, gas and/or mineral resources from the state in EITI implementing countries.</p> <p>Trafigura discloses information in line with EITI Standard and EITI reporting guidelines for companies buying oil, gas and minerals from governments. See URL.</p> <p>The Secretariat notes the company could consider including fees, charges and credits.</p>
<p>EXPECTATION 5 <i>Disclosure of audited financial statements</i></p> <p><i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i></p>	
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	<p>2024 Annual Report: https://www.trafigura.com/news-and-insights/publications/financials/2024/2024-trafigura-annual-report/</p>
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Trafigura discloses audited Financial Statements. See URL p. 59.
<p>EXPECTATION 6 <i>Beneficial ownership transparency</i></p> <p><i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i></p>	
Does the company publish a statement of support for	Yes

<p>beneficial ownership transparency?</p>	
<p>URL for statement of support for Beneficial Ownership</p>	<p>Payments to Governments Policy: https://www.trafigura.com/media/2vyaakw5/2023_trafigura_payments_to_governments_policy.pdf</p> <p>2024 Payments to Governments Report: https://www.trafigura.com/news-and-insights/publications/responsibility/2024/2024-sustainability-report/2024-payments-to-governments-report/</p>
<p>Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?</p>	<p>Partial</p>
<p>Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange</p>	<p>N/A</p>
<p>URL to stock exchange</p>	<p>Not applicable</p>
<p>URL for recent beneficial ownership disclosures</p>	<p>See commentary in 2024 Payments to Governments Report (as featured in below comment): https://www.trafigura.com/news-and-insights/publications/responsibility/2024/2024-sustainability-report/2024-payments-to-governments-report/</p>
<p>Secretariat's assessment on Expectation 6</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>Trafigura publishes a statement of support for beneficial ownership. See URL for Payments to Government Policy p. 4 and 2024 Payments to Governments Report p. 3.</p> <p>Trafigura is a private company and is as such not publicly listed on a stock exchange. Trafigura indicates the company is held by its employees but does not provide further beneficial ownership disclosures publicly. Trafigura notes in the payments to</p>

	<p>governments report that: "while Trafigura is an employee-owned company, we appreciate that beneficial ownership transparency supports robust due diligence. Accordingly, we provide information confidentially to commercial counterparties and we use comparable data in our decision-making processes." See URL p. 3.</p> <p>To make further progress on Expectation 6, Trafigura is recommended to fully disclose its beneficial owners in line with the Expectation.</p>
<p>EXPECTATION 7 <i>Due diligence processes and anti-corruption policies</i></p>	<p><i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i></p>
<p>Does the company publish an anti-corruption policy?</p>	<p>Yes</p>
<p>URL to the policy</p>	<p>Code of Conduct: https://www.trafigura.com/media/swrgewtm/2025-trafigura-code-of-conduct-english.pdf</p> <p>Sustainability Report 2024: https://www.trafigura.com/media/2c1ovyh3/2024_trafigura_sustainability_report.pdf</p> <p>Due Diligence Toolkit: https://www.trafigura.com/media/lh2npknk/2023_trafigura_rs_due_diligence_toolkit.pdf</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Trafigura publishes an anti-corruption policy. See URLs.</p>

	<p>Trafigura’s anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>This policy applies to all Trafigura employees, officers, directors, and third parties acting on its behalf globally. It includes provisions prohibiting bribery and corruption by Trafigura employees and third parties. The policy acknowledges the enhanced risk of partnering with certain third parties and references a requirement of enhanced due diligence processes in these circumstances. The policy references a more detailed guidance the "Trafigura Group Anti-Bribery and Corruption Policy", this guidance is an internal document and is not publicly available. See URL Code of Conduct pg. 10.</p> <p>The Sustainability Report 2024 also includes some anti-corruption provisions including a reference to Trafigura's due diligence processes which are referred to as "the Know Your Counterparty (KYC) onboarding and monitoring processes" and "enhanced process for high-risk entities." See URL Sustainability Report 2024 pg. 16.</p> <p>The due diligence process is further described, including how the company collects beneficial ownership information, in the separate "Due Diligence Toolkit for Suppliers". Including the requirements to maintain a supply chain register, adhere to the responsible mineral policy and complete a supplier questionnaire. It is stated this toolkit that the questionnaire must be sent to all suppliers and includes a requirement to identify the name, address and owners of the enterprise, for both mining and non-mining enterprises. The policy further describes risk mitigation steps including the creation of a "Risk and Corrective Actions Register" and the requirement to stop partnering with supplier which will not implement required risk mitigation steps within months. See URL Due Diligence Toolkit.</p> <p>The Secretariat notes that in 2024 and 2025 the former parent company of the Trafigura Group (Trafigura Beheer BV) was involved in two corruption cases launched by the US and Swiss Authorities respectively. In the United States, the company pleaded guilty to one count of conspiracy to violate the U.S. Foreign Corrupt Practices Act, in connection with bribe payments made between 2003-2014 to Brazilian officials to secure contracts with Petrobras. The case put forward by Swiss Authorities the company charged and found guilty of failing to have in place all reasonable and necessary organisational</p>
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	<p>measures to prevent unlawful payments via a former employee of the Angolan state energy company Sonangol between 2009-2011 in exchange for oil contracts</p> <p>The Secretariat notes recent actions taken by Trafigura to update its anti-corruption policies subsequent to these findings, including the Code of Business Conduct which was updated in July 2025.</p>
<p>EXPECTATION 8 <i>Contract transparency</i></p>	<p><i>Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i></p>
<p>Does the company publish a statement of support for contract transparency?</p>	<p>Yes</p>
<p>URL for statement of support for contract transparency</p>	<p>Payments to Governments Policy: https://www.trafigura.com/news-and-insights/publications/responsibility/2023/2023-trafigura-payments-to-governments-policy/</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 8</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Trafigura publishes a statement of support for contract transparency. See URL p. 4.</p> <p>Company assessed to contribute to the disclosure of contracts and licenses in EITI implementing countries.</p> <p>Trafigura is encouraged to promote disclosures in EITI implementing countries in line with the Standard, such as disclosing sales agreements with governments, as well as agreements involving the provision of goods and services (including loans, grants and infrastructure works), in full or partial</p>

	exchange for oil, gas or mining exploration or production concessions or physical delivery of such commodities.
EXPECTATION 9 <i>Gender Diversity</i>	<i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i>
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	Payments to Governments Policy: https://www.trafigura.com/news-and-insights/publications/responsibility/2023/2023-trafigura-payments-to-governments-policy/ 2024 Sustainability Report: https://www.trafigura.com/news-and-insights/publications/responsibility/2024/2024-sustainability-report/2024-sustainability-report/
Does the company disclose employment data disaggregated by gender?	Yes
URL for gender disaggregated employment data	2024 Sustainability Report: https://www.trafigura.com/news-and-insights/publications/responsibility/2024/2024-sustainability-report/2024-sustainability-report/
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	Trafigura publishes commitment and/or policy on gender diversity. See URLs for payments to governments policy p.4 and sustainability report p. 38-40. The company discloses employment data disaggregated by gender. See URL for sustainability report p.40.