



Modern Slavery Statement

This Modern Slavery Statement is made pursuant to s.54 of the UK Modern Slavery Act 2015 and sets out the steps that the Vitol Group (“Vitol”) has taken, and is continuing to take, to implement measures to ensure that modern slavery or human trafficking is not taking place within its business and supply chain.

Certain entities within Vitol are subject to the UK Modern Slavery Act 2015. This statement covers the period from 1 January 2025 to 31 December 2025. Vitol has a zero-tolerance approach to unethical practices and it is committed to acting professionally, fairly and with integrity in all its business dealings, and to combating modern slavery, human trafficking and forced labour.

The term “Vitol Group” is used to refer to Vitol Netherlands Coöperatief and its direct and indirect subsidiaries and affiliates, each of which is a separate and distinct legal entity.

About Vitol

Vitol is a global energy and commodities company. We trade and distribute energy and commodities safely and responsibly around the world using our logistical expertise and infrastructure network.

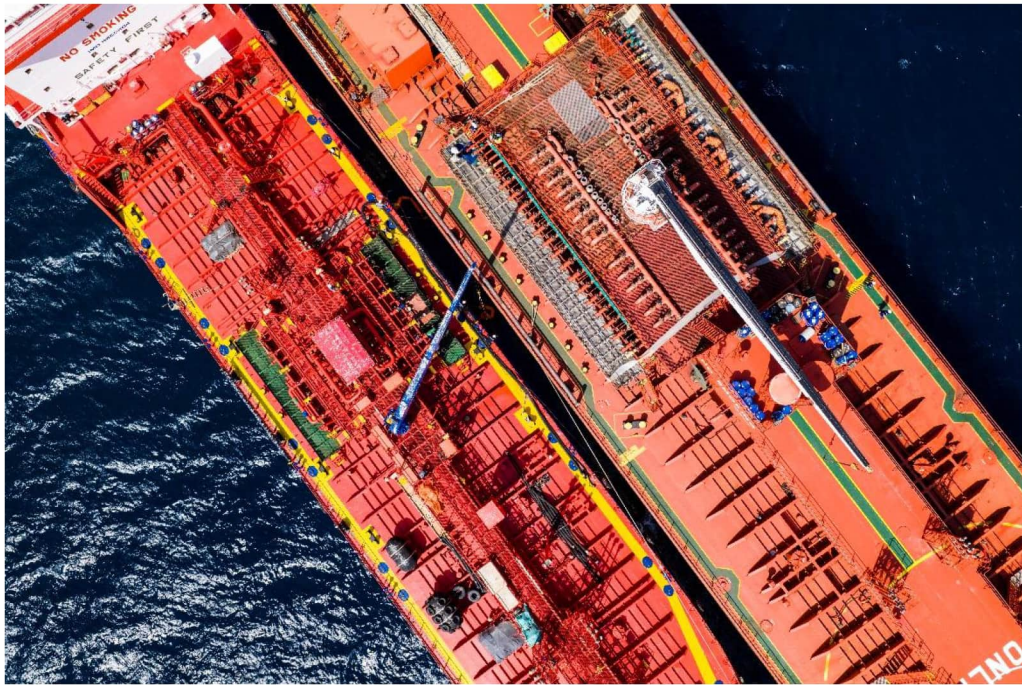
For more information on Vitol's activities and supply chains, please visit our:



[Website](#)



[ESG Reports](#)



Human rights strategy

Our human rights strategy is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We continue to review and strengthen our policy framework to reflect new products, new areas of activity and evolving human rights risks. It relies on three pillars: governance, due diligence and remediation. The strategy sets out our risk-based approach to embedding internationally recognised human rights in our processes, including with respect to the prevention of child labour.



1. Human rights topics that are the most severe and potentially arise through Vitol's own operations and business relationships
2. Know Your Counterparty

Our 2025 progress in a snapshot



Governance and commitments to human rights

We have established a suite of policies and procedures¹ to help ensure that Vitol and its business partners comply with our commitment to respect and promote internationally recognised human rights. These are aligned with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines). Vitol’s ESG framework sets out our approach to human rights and the standards applicable both to our own operations and to those of counterparties. The framework is intended to support responsible ESG performance and compliance with applicable legal and regulatory requirements, including those relating to internationally recognised human rights. These include the rights set out in the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Minimum Age Convention (No. 138), the Worst Forms of Child Labour Convention (No. 182), and the Maritime Labour Convention.

Within our supply chains, we communicate clear expectations to counterparties in relation to commodities where there is a potential risk of child labour, forced labour or other forms of labour exploitation. Counterparties are expected to maintain and implement appropriate policies, procedures and controls to identify, prevent and address such risks within their own operations and across relevant supply chains. They are also expected to conduct proportionate due diligence and monitoring, to take appropriate remedial action where concerns are identified, and to notify us of any instances of forced or child labour so as to enable timely escalation and follow-up.

In 2025, we enhanced our ESG processes and controls relating to road transport, with a particular focus on stakeholders potentially exposed to heightened labour exploitation risks, including risks associated with the use of subcontractors. As part of this work, we

- (i) updated our Trucking Operations Management System (TOMS) to cover key haulier activities and processes, and
- (ii) developed a Due Diligence Guide for Transport and Logistics.

1. Publicly disclosed on our [website](#)

The updated management system includes expectations relating to driver training programmes, including fatigue management and appropriate rest periods. These measures are intended to support safe working practices and help mitigate the risk of exploitative conditions within transport operations. The Due Diligence Guide sets out clear practical ESG and human rights due diligence steps to be applied during onboarding and ongoing monitoring, including through the use of an ESG questionnaire. The questionnaire addresses, among other topics:

- A Subcontractor engagement: Whether the trucking company engages third-party subcontractors, and, if so, the due diligence measures in place to assess and monitor subcontractor compliance with applicable laws and policies.
- B Security arrangements: Whether the trucking company contracts only security providers that align with recognised international standards (e.g., the Voluntary Principles on Security and Human Rights or equivalent frameworks), and how such compliance is assessed and monitored.

TOMS also forms the basis for haulier audits, which are used to assess whether these expectations are being implemented in practice at site level.



Human rights due diligence (1/2)

To support the assessment of actual and potential human rights impacts in our supply chains, and to monitor the implementation of the ESG framework across our operations, our Risk, ESG, Audit and Performance (REAP) department works closely with other internal functions and with the companies within our investment portfolio. Our risk-based human rights due diligence (HRDD) process, including the assessment of child labour risks, comprises the following four steps:

(a) Salient human rights issues identification

Our salient issues assessment across physical activities provides an overview of actual and potential high-risk and priority areas requiring enhanced due diligence to prevent, avoid and mitigate adverse human rights impacts.

As part of this assessment, we mapped actual and potential impacts across traditional, transitional and sustainable commodity value chains, with a separate assessment covering transportation activities. This process identified a number of products and services with potential exposure to child and forced labour risks.

Examples of areas where such risks may arise include mining, voluntary carbon offsetting projects, raw materials used in electric vehicles, wind and solar, and the cultivation and harvesting of certain feedstocks used in biofuels.

(b) ESG screening on counterparties: addressing human rights gaps

Before entering into a transaction with a counterparty, we conduct ESG screening based on defined risk factors. These include adverse media, the inherent ESG and human rights risks associated with the relevant commodity and country of production or operation, and any identified gaps in human rights policies and controls. The Know Your Counterparty (KYC) team also refers relevant transactions to the REAP department where ESG risks or adverse ESG media are identified. Where any potential ESG shortcomings are identified, including potential or actual child labour and forced labour impacts, the counterparty may be subject to further due diligence questions and tailored additional requirements, such as ESG commitments, certifications and audits. Child labour due diligence therefore forms an integral part of our standard counterparty screening process. This screening applies to all trading counterparties, higher-risk service providers and joint ventures, and is performed frequently.

For commodities where there is a potential risk of child or forced labour, enhanced due diligence (EDD) is required. At a minimum, this includes:

- (i) Identifying and documenting origin, to the extent traceability is feasible;
- (ii) Reviewing relevant counterparty or supplier policies and controls relating to child and forced labour;
- (iii) Conducting adverse media screening and assessing any red flags relating to allegations of child or forced labour; and
- (iv) On site visits for further investigation.

(c) Human rights controls in investment companies

We also conduct human rights reviews (HRR) across our investment portfolio and trucking. These involve on site assessments of the human rights management systems of companies in which Vitol holds an investment and that have physical operations. HRRs provide a structured basis for dialogue between Vitol and its stakeholders regarding Vitol’s ESG framework, related commitments and areas of heightened risk, including potential risks associated with procured products and services. They also help increase visibility of actual or potential human rights impacts, strengthen controls and identify good practices through engagement with management, employees and contractors.

Areas for improvement identified through the HRR process are documented in a final report shared with relevant stakeholders, tracked through follow-up actions and escalated, where appropriate, to the relevant Committee and the Board.

(d) Human rights impact assessment

We undertake human rights impact assessments (HRIAs) in relation to activities where we believe salient issues may arise and where we are in a position to help prevent, mitigate or remediate adverse impacts. HRIAs complement audits and provide insight into the human rights experiences of relevant rights holders, with a particular focus on the issues most material to them.

Engagement with potentially affected stakeholders forms part of the process and provides a deeper analysis into root causes of child labour, forced labour or other forms of labour exploitation. HRIAs also support our assessment of whether our performance and controls can be further strengthened and are the most in-depth type of review.

Human rights due diligence (2/2)

2025 HRDD at a glance

In 2025, we strengthened our HRDD approach by improving how we monitor, assess and escalate child labour and broader human rights risks across our activities and supply chains. This was also supported by the automation of key processes to enable earlier risk detection, more consistent escalation, and improved traceability of decisions and follow-up.

Enhanced risk assessments

Following our expansion into metals, we enhanced our risk assessment and due diligence processes to better tailor our assessment of ESG risks linked to these specific commodities. Metals activities are screened for heightened risks, including child labour and forced labour.

In parallel, we strengthened our country risk assessment methodology across four dimensions, including a dedicated social dimension, and introduced new human rights indicators to improve identification of labour and human rights risk drivers. The framework is aligned with leading international standards, including the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP), the OECD Due Diligence Guidance, EU conflict-affected and high-risk areas (CAHRA) expectations, and the London Metal Exchange (LME) responsible sourcing policy requirements. It provides global coverage across the core CAHRA dimensions – conflict, governance, and human rights – with an additional environmental lens, using data from reputable international sources (e.g., the World Bank, Transparency International, Walk Free, ITUC, Yale).

Operational controls and escalation mechanisms

We prioritised the strengthening and automation of elements of our HRDD and modern slavery and child labour risk management processes to improve consistency, traceability and the timely escalation of higher risk cases.

As part of this work, we developed an internal platform to track transactions and due diligence activity in a more structured manner. This has improved the way in which due diligence information is stored and supports clearer oversight of follow up actions relating to human rights risks – including child and forced labour risks in our operations.

We also implemented an internal compliance screening tool, strengthening collaboration between compliance and REAP teams. As part of this, we tested and introduced automatic escalation rules to ensure that potential gaps or risks identified through our counterparty KYC screening process – including those relating to forced labour and child labour – are automatically routed for additional review and approval. Furthermore, the highest-risk cases are escalated internally to the ESG Committee, which comprises eight Senior Managers and two Vitol Executive Committee members and determines the appropriate course of action, including any requirements to address, mitigate, and monitor those risks.

Building on these system enhancements, we integrated country risk assessment outputs into the screening process, supporting the identification of higher-risk jurisdictions and the more consistent triggering of enhanced due diligence, where appropriate.

These process and system enhancements are complemented by support from the Legal team, which helps translate identified ESG and human rights risks into appropriate contractual protections and mitigation measures. In addition, in 2025, we updated our ESG clauses and introduced a more streamlined, standardised contractual approach to support consistent application across transactions.

Monitoring and continuous improvement

To strengthen internal capability and support a consistent approach to identifying and addressing forced labour, child labour and broader human rights risks, we developed an internal Human Rights Review (HRR) handbook to guide colleagues in conducting HRRs. The handbook sets out a structured, risk-based methodology aligned with the UNGPs and Vitol’s internal framework, helping to ensure that reviews are conducted consistently and proportionately across relevant activities, counterparties and projects.

The handbook covers the full HRR process, including planning and scoping, on-site assessment, documentation of findings, and follow-up reporting. Review outcomes are used to inform risk mitigation measures, support the strengthening of controls where needed, and monitor progress over time through targeted follow up actions.

Given our activities in the metals sector and the potential heightened risks of child labour, forced labour and other forms of modern slavery that may arise in certain contexts, the handbook also includes a dedicated mining site checklist. This provides additional guidance on higher risk worker groups, contractor oversight, and verification steps to support the identification and assessment of potential labour rights risks.

Training

In 2025, we developed additional ESG training materials and incorporated them into mandatory onboarding for new colleagues. This helps to raise internal awareness across relevant functions of human rights risks and due diligence expectations, while strengthening cross-functional collaboration to support compliance with applicable legislation and stakeholder expectations. Training was also provided to the Vitol Legal team on ESG clauses in agreements.

We continue to provide risk-tailored child labour due diligence training for relevant employees and all members of relevant trading desks to strengthen their understanding of potential child labour risks and the controls required to identify, assess and escalate such risks. New joiners working with commodities identified as presenting potential child labour risks must complete the training.

The training covers the following topics:

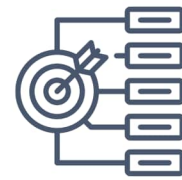
-  Definition of child labour
-  Factors impacting risk
-  Legal requirements and Vitol's commitment
-  Employee responsibilities
-  Knowledge testing



Grievance mechanisms



Effective grievance mechanisms are an important means of identifying risks and ensuring that stakeholders – including employees, contractors, communities, counterparties and customers – have a way to raise concerns.



While our objective is to conduct our business in a manner that prevents adverse impacts from arising, we also recognise that accessible and trusted grievance channels are an important part of responsible business conduct. The raising of grievances can indicate that stakeholders are aware of the channels available to them and have confidence in using them.



We track the number and type of grievances raised, resolved or found to be unsubstantiated and seek to understand their causes and outcomes. The Vitol Global Integrity Hotline enables employees to raise concerns relating to their employment and business activities. It is managed by an independent third party, is fully confidential, and allows concerns to be raised anonymously.



Our investment companies report quarterly on grievances and human rights breaches, which are addressed in a fair and consistent manner. Poor labour conditions and related concerns are part of the issues to be reported, helping us identify potential or actual modern slavery issues in our investment portfolio.

Continuous improvement

Implementing our policies requires continuous efforts to identify, prevent, mitigate and address human rights impacts, including risks related to forced labour and child labour.

We continuously monitor the effectiveness of our measures and periodically report on our performance.

We remain committed to continuous improvement and regularly review our approach to ensure it remains responsive to evolving risks, operational developments, and stakeholder expectations.

Level	Description	Access
Vitol	Vitol internet page with contact form	All stakeholders
Vitol	Vitol Global Integrity Hotline	All Vitol employees
Project	Bespoke-designed in-country grievance mechanisms	All relevant stakeholders

This Modern Slavery Statement has been approved on behalf of Vitol Broking Limited, Vitol Services Limited and Vitol SA as set out below.

For and on behalf of **Vitol Broking Limited and Vitol Services Limited**


Jonathan Marsh
Director
17 June 2026

For and on behalf of **Vitol SA**


Benjamin Winterton
Director
22 June 2026