



# Vitol Statement on Forced Labour and Child Labour Due Diligence 2023

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This report relates to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Canadian Bill S-211. It covers the period of 1 January 2023 to 31 December 2023.

The terms "Vitol Group" or "Vitol" are used for convenience and refer to Vitol Netherlands Coöperatief U.A. and its direct and indirect subsidiaries and affiliates, each of which are separate and distinct legal entities.

# About Vitol

- ✔ Vitol is a global energy and commodities company. We trade and distribute energy safely and responsibly around the world using our logistical expertise and infrastructure network. We work to meet the world’s energy needs today and in the future through traditional, transitional and sustainable energy solutions.
- ✔ Globally, our traditional energy solutions center around hydrocarbon products, including crude oil and refined products, delivering more than 7 million barrels per day.
- ✔ Our transitional energy solutions focus on gas (natural gas, LNG, LPG), power, and biofuels, representing about a third of our physical energy volumes in 2023, with over 1,600 TWh of natural gas, 220 LNG cargoes, and 150 TWh of power delivered to industrial and utilities counterparties.
- ✔ Our sustainable energy solutions encompass a broad range of projects in solar, wind, batteries, renewable natural gas, landfill gas, electric fleet solutions, and high-quality carbon credits, maximizing synergies with our trading capabilities, and serving diversified counterparts such as large corporates and industrials, utilities, municipalities and local communities.
- ✔ Vitol Inc. (“VIC”) buys and sells various energy products, supplying market participants with the specific types and grades of energy products they need. Those products include crude oil, middle distillates (jet fuel, kerosene, gasoil and diesel), gasoline, biofuel (B100, B99, and ethanol), fuel oil, naphtha, bitumen, LPG, LNG, natural gas, and power.
- ✔ Vitol Biofuels Marketing LLC (“VBM”) buys and sells ethanol, focusing primarily on marketing ethanol produced from plants located in the United States.

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

 [Website and](#)

 [ESG Report 2023.](#)



# Introduction



This report on Fighting Against Forced Labour and Child Labour in Supply Chains (the “Report”) is a joint report made under Section 11 of the Act by the following entities (together, the “Reporting Entities”) in accordance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023) (the Act) for the year 1 January 2023 to 31 December 2023 (the “Reporting Period”). In the Report we describe the actions that the Reporting Entities have undertaken to assess and manage the risks of forced and child labour.

| Reporting Entities           | Country of registration | Principal business |
|------------------------------|-------------------------|--------------------|
| Vitol Biofuels Marketing LLC | United States           | Trading entity     |
| Vitol Inc.                   | United States           | Trading entity     |

# Human rights strategy

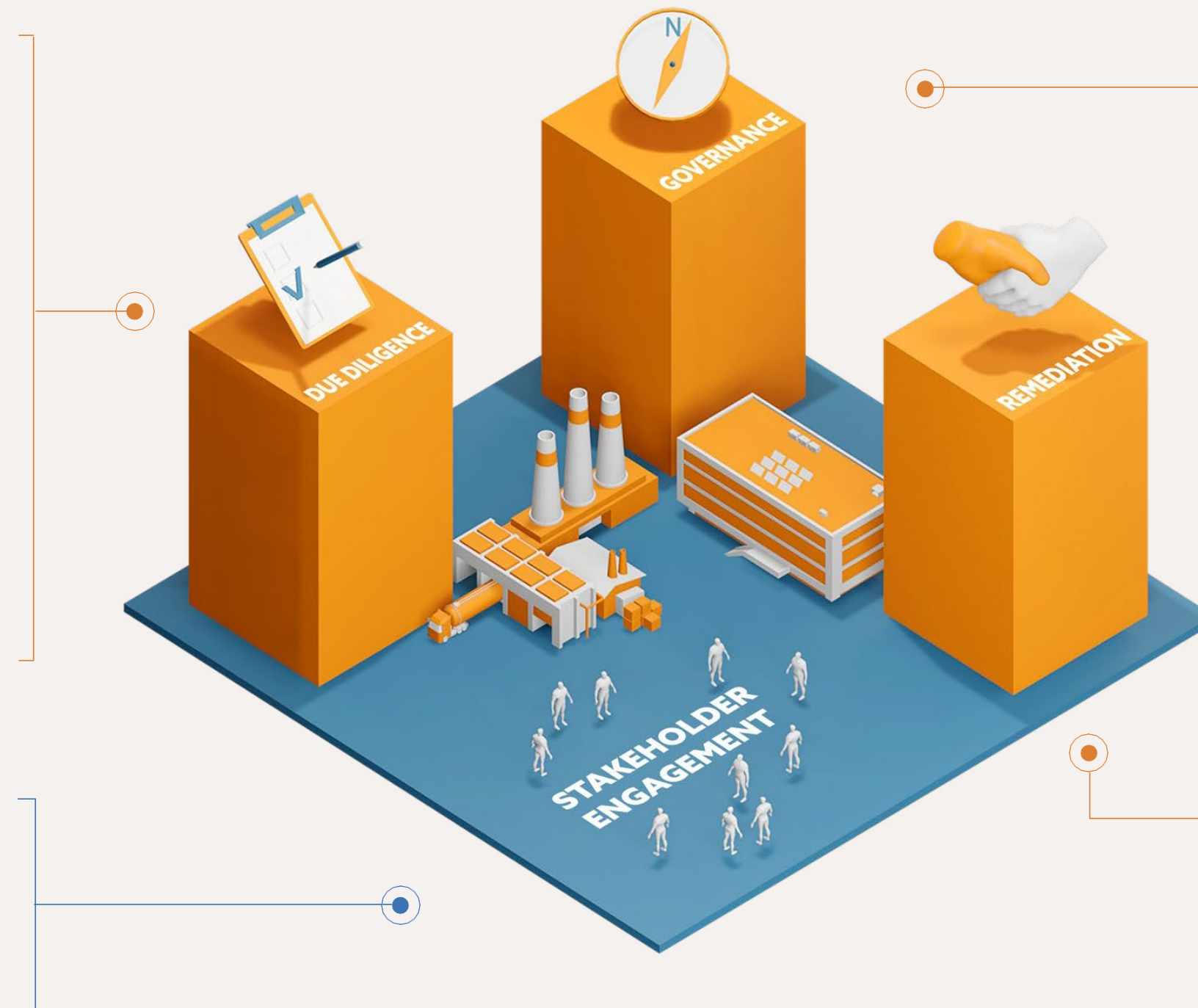
The Vitol Group human rights strategy follows the United Nations Guiding Principles on Business and Human Rights (UNGPs). It relies on three pillars: governance, due diligence and remediation. It defines our risk-based approach to embed internationally recognised human rights in our processes, including the prevention of forced and child labour.

**Impact assessments:** Identify and assess human rights impacts across our business activities (e.g., salient issues<sup>1</sup>, ESG<sup>2</sup> risk register)

**Monitoring systems:** Integrate human rights into existing management systems and activities (e.g., risk-based KYC<sup>3</sup>) to address adverse impacts and track performance via KPIs<sup>4</sup>

**Counterparty management:** Communicate expectations to business counterparties and build capacity across our value chain (e.g., ESG clauses, on-site human rights reviews or impact assessments)

**Stakeholder engagement** underpins our human rights strategy, enabling us to deliver on our 3 pillars thanks to our ongoing interactions with stakeholder groups potentially affected by our business activities



**Corporate governance:** Ensure governance and relevant policies are aligned with our risk exposure and comply with international human rights standards

**Capacity-building:** Develop training for specific audiences on human rights risks, tools and processes

**Human rights reporting:** Report on progress in embedding human rights into our business to the board and interested stakeholders

**Grievance mechanism:** Ensure access to an effective grievance mechanism for potentially affected stakeholders (e.g., Vitol global integrity hotline)

**Remediation plan:** Ensure appropriate response to grievances and adverse impacts (e.g., implementing corrective action plans)

**Collective action:** Partner with our peers on common industry challenges

1. Human rights topics that are the most severe and potentially arise through Vitol's own operations and business relationships  
 2. Environmental and Social Governance  
 3. Know Your Counterparty  
 4. Key Performance Indicators



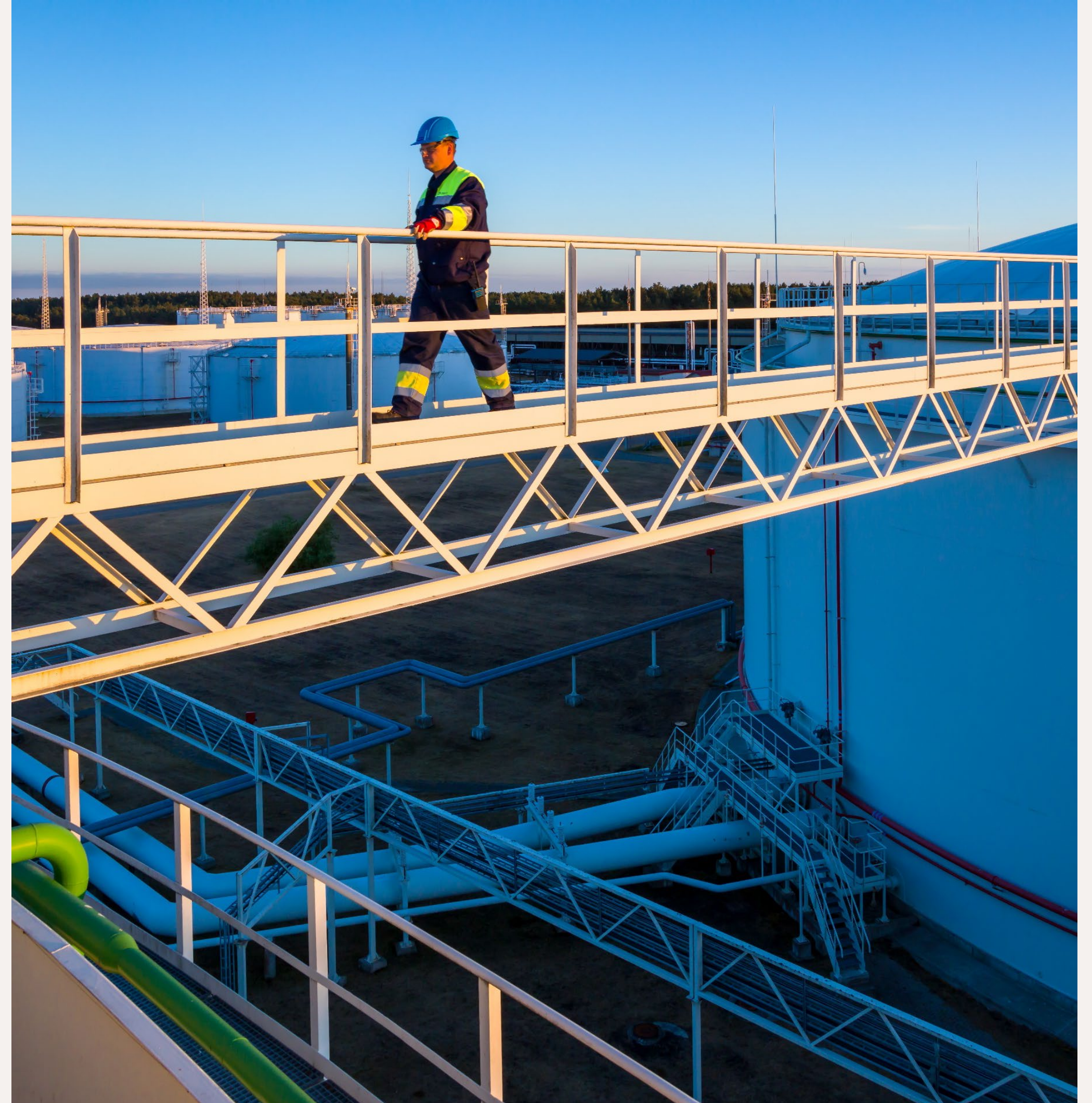
## Our commitment to human rights

We are committed to respecting and promoting human rights, recognizing that our activities may positively or adversely impact people. We strive to continuously improve by setting standards and implementing procedures in our own business operations and business relationships.

The Vitol Group's commitment to upholding the highest standard of ethics is detailed in our frameworks, policies and statements which are all publicly disclosed on our [website](#). This commitment is notably addressed in Vitol's [Code of Conduct](#) and in Vitol's [ESG framework](#). Through our guidelines we commit ourselves to conduct our business in accordance with the UNGPs and to ensure our operations remain at all times compliant with the applicable legislative and regulatory regimes.

In our ESG framework, Vitol defines our expectations on responsible business conduct for our own operations and business counterparties, and reports annually on how we implement our commitments in our [ESG Reports](#).

We are committed to respecting all internationally recognized human rights, encompassing those enshrined in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, which includes the Minimum Age Convention (No. 138), the Worst Forms of Child Labour Convention (No. 182), the Forced Labour Convention (No. 29), the Abolition of Forced Labour Convention, 1957 (No. 105) and the Maritime Labour Convention, 2006. We prohibit forced, trafficked and child labour and do not tolerate any physical or verbal abuse or workplace harassment.



# Human rights due diligence

To continuously assess actual and potential human rights impacts as well as to monitor the implementation of the framework in our operations, our ESG department works closely with other internal functions and with the companies in which Vitol is invested.

## Salient human rights issues

Vitol Group salient issues assessment provides us with an overview of high-risk and priority areas for enhanced due diligence to prevent, avoid and mitigate adverse impacts on human rights. In our salient issues assessment, we mapped actual and potential impacts in the traditional, transitional and sustainable energy value chain, with a separate assessment for transportation. In our assessments we identified goods with forced and child labour risk exposure in our value chain and are in the process of internally prioritizing impacts.

Generically, child and forced labour may exist at the plantation and harvesting level of some feedstocks used for biofuels. The risk decreases if production is mechanised and sourced from a low-risk jurisdiction. Risk for forced labour exists also in trucking and vessel chartering operations, if utilizing non-unionized workers and in high-risk jurisdictions. In 2023, risk exposure to forced and child labour in biofuels was low for the Reporting Entities.

## KYC

When screening counterparts, Vitol uses international databases to identify ESG issues, including child or forced labour. Child and forced labour due diligence are an integral part of our standard KYC process. The KYC team escalates relevant transactions to the ESG department based on ESG risk or adverse ESG media. The ESG department may require additional controls e.g., additional confirmation on ESG management, insertion of ESG clauses, carrying out third-party audits, or other relevant certifications.

## Counterparty monitoring

Vitol's KYC team varies the frequency of its review of counterparties' ownership and adverse media hits, based on a risk assessment (from lower to higher risk). ESG issues highlighted by this process, such as adverse media hits related to child and forced labour, are escalated to the ESG department. Vitol acts upon findings that are in violation of the Vitol ESG framework and engages as appropriate.



## Grievance mechanism

Grievance mechanisms are effective to identify risks and ensure that stakeholders have a way to raise an issue (e.g., employees, contractors, communities, counterparties or customers).



Our ambition is to undertake business in such a way that no grievances occur. However, we also recognize that it is a positive sign if grievances are raised, which shows that stakeholders are aware of the reporting channels available to them and feel confident in their use. We track the number and type of grievances raised, resolved or found to be unsubstantiated and seek to understand their causes and outcomes.



Our Vitol Integrity Hotline enables employees to raise concerns relating to their employment and Vitol's business activities. It is managed by an independent third party and is completely confidential. Grievances can also be raised anonymously. Our investment companies report quarterly on grievances and human rights breaches which are dealt with in a fair and consistent manner. Monitoring grievances across companies in which Vitol has invested also helps us to understand how this issue is reflected throughout our value chain.

| 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 |

## Continuous improvement

Implementing our policies entails continuous efforts to identify human rights impacts, mitigating and, where possible, addressing them, continuously monitoring the effectiveness of our measures and periodically reporting on our performance. We strive for continual enhancement and regularly reassess our responsiveness within a dynamically evolving operational landscape.



## Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that the Report was approved pursuant to subparagraph (4)(b)(i) of the Act. I also attest that I have reviewed the information contained in the Report for the entities listed below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Period.

**Richard J. Evans**

Director  
31 May 2024  
Vitol Biofuels Marketing LLC  
Vitol Inc.



**I have authority to bind the  
VBM and VIC companies**

