

HSEC BUSINESS PRINCIPLES

impala

ACCESS COMMITMENT



TERMINALS ► DEVELOPMENT

Impala is a leading investor in infrastructural development. We identify, invest in, build and manage the terminal and port facilities required to optimise supply chains and meet the demands of the global commodities business.

WAREHOUSING ► SECURITY

Impala focuses on the storage of refined metals, concentrates and bulk commodities via non-bonded fiscal warehousing and LME-approved warehousing. Facilities are located at mine sites, in transit locations and in production or consumption areas. We also offer complementary added-value services critical to the efficiency of the commodities sector.

LOGISTICS ► DELIVERY

Impala provides expertise in the coordination of bulk, break-bulk and container freight via rail, road, river and sea, with a focus on refined metals, non-ferrous concentrates, iron ore and coal, as well as chemicals and general cargo.

ACCESS ► OPPORTUNITIES

Impala owns and operates a network of terminals that facilitate global trade flows. We specialise in providing port, warehousing and multi-modal logistics solutions for the efficient movement of essential commodities worldwide. We combine the strengths of our people and our assets to provide vital access to markets and new opportunities.



ABOUT THIS DOCUMENT

Our Health, Safety, Environment and Communities (HSEC) Business Principles should be read alongside our HSEC Policy. Both documents apply to all companies and operations in the Trafigura Group, including Impala, over which Trafigura Beheer B.V. has either direct or indirect control over the majority of the voting rights.

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This document, along with our HSEC Policy, is to be widely communicated internally within Impala and will be issued to key stakeholders as appropriate/on request. Both documents will be made publicly available via Impala's website.

Our HSEC Business Principles communicate the expectations of Trafigura's Management Board and Impala's Executive Committee with respect to how the Group and its operating divisions and subsidiaries operate and behave. Expectations are aligned with commitments presented in our HSEC Policy.

Both our HSEC Business Principles and HSEC Policy constitute a key element of Trafigura and Impala's overall approach to HSEC governance.

IMPALA'S COMMITMENT TO HSEC

At Impala we are committed to operating and growing our business in a responsible and sustainable way. We aim to conduct activities in a manner that is safe and that protects our employees, the environment, and the communities where we operate. In doing this, we are guided by the principles of the United Nations Global Compact.

These Health, Safety, Environment and Community (HSEC) Business Principles describe the standards we apply and the principles we uphold. They are enforced across all divisions and companies in the Trafigura Group*.

Individual managers across the business are accountable for leading and promoting good HSEC practice, providing resources and training for their staff. They are also required to measure and report on HSEC performance on a regular basis.

Each constituent company within the Trafigura Group is expected to supplement the HSEC Business Principles with relevant sector-specific standards and supporting policies and procedures for their day-to-day operations. In addition, Impala's Code of Business Conduct provides the procedures for all employees on ethical business practices.

We also encourage those with whom we do business to apply comparable, comprehensive and complementary standards, principles and policies.



Claude Dauphin,
Chairman and CEO.
For and on behalf
of Trafigura's Board
of Directors.



Andrew Vickerman,
Chair of the HSEC
Steering Group. For and
on behalf of Trafigura's
Supervisory Board.



Nicolas Konialidis,
Chief Executive Officer,
Impala.

*The terms "Trafigura", "Trafigura Group", "Group", "we" and "our" refer to Trafigura Beheer B.V. and any company over which Trafigura Beheer B.V. has either directly or indirectly control of the majority of the voting rights in that company.

IMPLEMENTATION GUIDANCE

Impala is adapting constantly to meet and ideally exceed society's ever-evolving expectations for responsible and sustainable business practices. Our staff work hard worldwide to promote this, not only in our operations but also with our suppliers, customers, partners and within our industry sectors.

The Impala HSEC Business Principles set out our approach to implementing our HSEC Policy and meeting the overall HSEC goals. We have adopted HSEC Business Principles in four core areas, which outline our philosophy and the standards we uphold:

- Health and safety;
- Environment;
- Human rights and labour practices; and
- Community relations.

These HSEC Business Principles apply to all companies in the Group and, as such, companies and operations shall adopt and comply with the HSEC Business Principles.

The HSEC Business Principles are not a substitute for national laws and regulations. While the principles may extend beyond the law they must not place Impala in a situation where it faces conflicting requirements. When unsure, the most stringent standard should be applied.

Impala aspires to play an active role in promoting good HSEC performance worldwide. Our HSEC Policy shall be communicated to all employees and made publicly

available via our website. The HSEC Business Principles are communicated to all employees, business partners, and external stakeholders.

Impala will seek assurance of compliance with the HSEC Business Principles and assess the extent to which the HSEC Business Principles are being effectively implemented. Assurance outcomes will be presented to, and discussed by, our HSEC Steering Group. Our Corporate Affairs department will be responsible for overseeing the communication of significant findings and any associated actions to internal and external stakeholders.

SUPPLIERS & COUNTERPARTIES

We will enforce our HSEC expectations through disclosure of our HSEC Business Principles to those with whom we do business. Trafigura expects all business partners to apply comparable, comprehensive and complementary standards, principles and policies.

BUSINESS ETHICS

All our employees are required to act with integrity and abide by our Code of Business Conduct. Impala is committed to doing business in accordance with the highest standards of ethics and integrity.

Our Code of Business Conduct outlines our policy on business ethics and procedures for managing related risks. Please refer to Impala's Code of Business Conduct for the full suite of policies and procedures on Business Ethics.



OUR APPROACH

HEALTH AND SAFETY

ENVIRONMENT

HUMAN RIGHTS AND
LABOUR PRACTICES

COMMUNITY RELATIONS



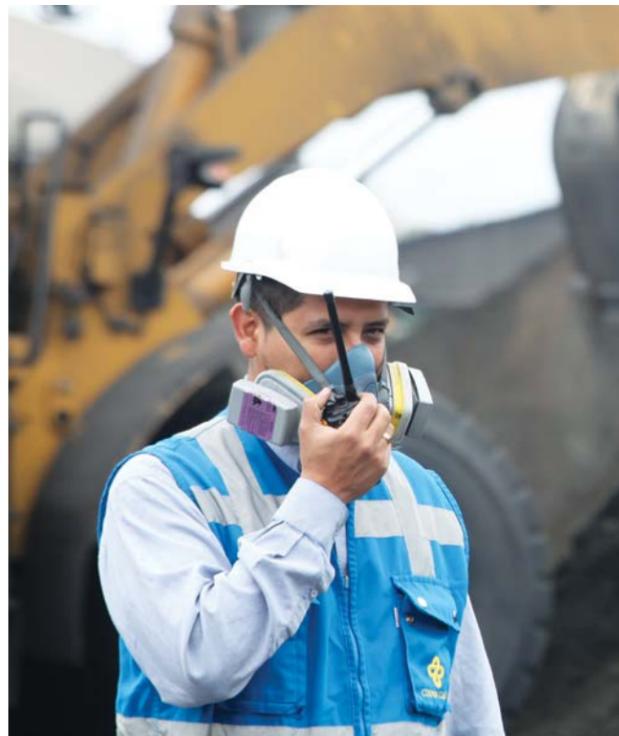
HEALTH AND SAFETY

We take the safety of our employees, suppliers, contractors and partners seriously. Our people operate heavy machinery and transport flammable and toxic materials. We need to be certain that risks are kept to a minimum.

OUR BUSINESS PRINCIPLES

A safe and healthy work environment is a basic human right recognised in national and international law including United Nations' (UN) and International Labour Organisation's (ILO) conventions. Trafigura is committed to full operational compliance with relevant national and international health and safety laws.

- 1 We will provide a safe and healthy workplace for all employees, contractors and visitors.
- 2 We will identify hazards, risks and unsafe behaviours and where these cannot be eliminated, then they will be appropriately mitigated.



- 3 We will maintain appropriate health and safety management systems that:
 - a Identify and evaluate the risk of fatality, injury or illness from our work and operations;
 - b Implement controls that ensure these risks are minimised to the lowest level practicable;
 - c Require the reporting and investigation of work-related accidents, incidents, illnesses and near-misses; keeping records, stating their cause and taking remedial measures to prevent their recurrence;
 - d Set targets and indicators to enable robust management and reporting on health and safety management performance;
 - e Require that the planning, design and operation of all facilities or operations explicitly address and include health and safety standards, procedures and processes;
 - f Ensure workers have the skills, knowledge, training and resources necessary to maintain a safe and healthy working environment;
 - g Empower all workers to stop work or any operation if they consider the health and safety risks or hazards faced to be unacceptable;
 - h Provide employees and visitors with appropriate personal protective equipment (PPE) at no cost to the individual and ensure users are trained to use such PPE;
 - i Make potable water, sanitary facilities and first aid facilities available in the workplace where practicable to do so;
 - j Provide measures to prepare for and effectively respond to crises, emergencies and accidents; and
 - k Include a feedback/audit loop and a focus on constant performance improvement.

ENVIRONMENT

We are committed to minimising the impact of our activities on the environment. We support policies that address climate change without damaging society's ability to meet the growing demand for secure, affordable energy and vital natural resources.

OUR BUSINESS PRINCIPLES

We are committed to minimising the impact from our business operations on the natural environment, including full compliance with national and international environmental laws.

- 1 We will maintain appropriate environmental management systems that:
 - a Identify, and then minimise the risks to the natural environment from our work and operations to the lowest level practicable;
 - b Require the reporting and investigation of work-related environmental accidents, incidents and near-misses; keeping records, stating their cause and taking remedial measures to prevent their recurrence;
 - c Set targets and indicators to enable robust management and reporting on environmental impacts, improvement measures and achieved performance;
 - d Require that the planning, design and operation of all facilities or operations explicitly address and include environmental standards, procedures and processes;
 - e Ensure workers have the skills, knowledge and resources necessary to prevent, mitigate or minimise damage to the natural environment;
 - f Empower workers to stop work or any operation if they consider environmental risks or hazards to be unmitigated;
 - g Include a feedback/audit loop and a focus on constant performance improvement.
- 2 We will endeavour to use environmentally sound technologies in the course of our operations.
- 3 We will progressively implement measures to improve the environmental performance of our operations, including:
 - a Improving energy efficiency and the efficient use of natural resources;



- b Reducing greenhouse gas emissions and collaborate with others to contribute to climate protection;
 - c Reducing water usage;
 - d Reducing waste and increasing reuse and recycling; and
 - e Reduce emissions to air, water and land.
- 4 We will endeavour to reduce the generation of hazardous and non-hazardous waste materials.
 - 5 We will avoid the release of pollutants or, when avoidance is not technically feasible, minimise the release and mitigate the potential impact as far as necessary and possible.
 - 6 We will assess our impacts on biodiversity and ecosystem services and endeavour to avoid net losses and minimise impacts.
 - 7 We will have emergency procedures in place to deal with environmental incidents.
 - 8 In accordance with international standards we will conduct impact assessments for projects or activities that have the potential to impact the environment and affect communities including, but not limited to, the International Finance Corporation (IFC) Performance Standards.
 - 9 We will communicate with stakeholders to ensure they are informed about relevant environmental risks that may impact them.

HUMAN RIGHTS AND LABOUR PRACTICES

Our world-class network and logistics capabilities enable us to perform a vital economic role. We are contributing to economic development in the markets we serve. We provide employment and high-quality infrastructure. We recognise our responsibility to safeguard human dignity and defend the inalienable rights of individuals.

OUR BUSINESS PRINCIPLES

Basic human rights including labour rights are understood as the rights outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Respect for human rights safeguards human dignity and is a universal, indivisible, interdependent and interrelated requirement. Trafigura supports and respects internationally proclaimed human rights and welcomes the United Nations 'Respect, Protect, Remedy' framework, which establishes the basic expectations of all businesses with regard to the management of human rights impacts.



- 1 We will seek to contribute to positive human rights development in our area of influence, including the positive effect which results from the creation of jobs, the use of nationals, provision of training and development.
- 2 We will assess actual and potential human rights impact in order to identify, prevent and mitigate adverse human rights practice.
- 3 We will seek to avoid complicity in human rights abuses.
- 4 We will ensure that our staff and managers are properly trained and equipped to respect and support the protection of human rights in our operations.
- 5 We will establish or participate in effective grievance mechanisms for individuals who may be affected adversely by our operations and seek to ensure their access to remedy.
- 6 We will report regularly on our efforts to support and respect human rights.
- 7 We will ensure full operational compliance with applicable labour legislation and regulations and associated company standards and requirements.
- 8 We value respect, fairness, non-discrimination, equal opportunity, training and development, and diversity within our workplace.
- 9 We will maintain and support the rights of our employees to bargain collectively and to freedom of association.

COMMUNITY RELATIONS

We rely on the active support of nearby communities. Maintaining a viable long-term presence at locations where we have strategic assets is only possible with their continued goodwill. We recruit locally. We work with community leaders and engage in local life.

OUR BUSINESS PRINCIPLES

We aim to be good, respectful corporate citizens, and engage respectfully with communities where we work. We will respect human rights and contribute to the long term social and economic development of the local communities affected by, and associated with, our operations.

- 1 We will seek to increase the positive impacts on communities while working to avoid the potential for negative social, environmental and economic impacts on communities, by:
 - a Conducting social, environmental and economic risk assessments, where appropriate;
 - b Conducting human rights impact assessments, where appropriate;
 - c Managing hazards, risks and the potential impacts to the community arising from our business activities in an appropriate manner; and
 - d Promoting local procurement, recruitment, spending and cooperation.
- 2 We will identify, consult and actively engage in dialogue with affected and potentially affected communities and key stakeholders in a transparent and culturally appropriate way.



- 3 We will establish or participate in effective grievance mechanisms for those communities which are likely to experience negative impacts from our operations or projects. We will enable local communities and stakeholders to raise concerns pertaining to our business activities, and will analyse and respond appropriately to these.
4. We will report regularly on our efforts to protect and support the communities where we work.

Our 'Environment' and 'Human Rights and Labour Practices' policies also articulate our approach to upholding appropriate Community Relations standards.

For more information please contact:
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In this publication, the terms "Impala", "the company", "the group", "we", "us" and "our" are used for convenience to denote Impala Holding (MI) LLC and /or one of its subsidiaries. These terms are used where no useful purpose is served by identifying a specific company or entity in the Impala group.