

Richard Holtum
Chief Executive Officer
Trafigura Group Pte. Ltd
10 Collyer Quay
#29-00
Ocean Financial Centre
Singapore (049315)

B4Ukraine 

June 30, 2025

Dear Mr. Holtum and the Trafigura Leadership Team,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations committed to curbing the financial support that fuels Russia's brutal invasion of Ukraine. Given the turbulent and uncertain political situation and discussions about the potential return of Western businesses to Russia, we are reaching out again to urge your company to commit to a full and permanent exit from the Russian market.

Businesses must not return to the Russian market until:

- Ukraine's sovereignty and complete territorial integrity are restored, as recognized by international law.
- Reparations are paid in full for all damages caused by Russian aggression, covering infrastructure, economic losses, and human suffering.
- Accountability is imposed for violations of international law, including the crime of aggression, war crimes, and crimes against humanity.

As is outlined below, this is not only a matter of principle but also a strategic and financial judgment based on a plethora of risks related to Russia. The circumstances that led to the withdrawal of foreign firms from Russia have not changed. The war against Ukraine continues, and the economic, legal, and reputational risks of doing business in Russia remain high.

We commended [Trafigura](#) on its decision to leave the Russian market following the country's full-scale invasion of Ukraine.

In a recent [statement](#), Trafigura's CEO Richard Holtum noted that the company's large cohort of British employees would complicate any potential return to the Russian market if U.S. sanctions were lifted while other restrictions remained. He stated: "You would need to see a wholesale winding back of all the sanctions before it's something that could even be considered."

While we welcome this recognition of the regulatory complexity, these remarks suggest that Trafigura may be open to re-engagement with Russia under certain conditions. In the context of Russia's continued aggression against Ukraine and international efforts to reduce its war-financing capacity, such a position raises serious concerns.

We therefore seek clarity on Trafigura's current operations and future intentions regarding Russian energy. We respectfully ask the company to confirm whether it plans to fully and permanently exit the Russian market. Given the legal, financial, reputational, and human rights risks involved, we urge Trafigura to publicly clarify its stance and demonstrate alignment with international human

rights and humanitarian law, as well as its responsibilities under the UN Guiding Principles on Business and Human Rights.

The wide range of risks associated with returning to and operating in Russia, including financial, legal, reputational, operational, and human rights risks, are outlined in greater detail below. We would welcome the opportunity to discuss these concerns directly and confidentially with your team. To that end, we invite you to a meeting to explore these issues further. If you would like to discuss these matters with representatives of Ukrainian and wider civil society, please confirm your availability by **July 14, 2025**, so that we can arrange a suitable time. Please note that following this date, this letter and any responses received will be published on the B4Ukraine website.

Sincerely,

The B4Ukraine Coalition

The Risks of Re-Engaging with the Russian Market

Recent speculation about the potential lifting of sanctions, particularly in the United States, has created uncertainty. However, it is clear that the broader sanctions regime remains intact. The United States has for now maintained its restrictions, while the European Union recently approved its [17th package](#) of sanctions. Even if some policymakers consider relaxing their stance, the reality remains that the EU, UK, Japan, Canada, and numerous other governments and organisations have imposed sanctions on Russia, making it the most sanctioned country in the world, due to its crime of aggression against its sovereign neighbour.

It has been three years since Russia invaded Ukraine, committing the crime of aggression and breaching the UN Charter. Russia is violating international humanitarian and human rights law, committing over 150,000 documented war crimes. In recognition of the severity of abuses, in March 2023 the International Criminal Court issued an arrest warrant for Vladimir Putin to answer charges of war crimes.

At the same time, economic and regulatory conditions in Russia are no longer conducive to stable business operations. Companies re-entering the market would be navigating a landscape of restricted [supply chains, financial barriers, and legal uncertainties](#). Since 2022, Russia has pursued a deliberate strategy of seizing foreign-owned assets, whether through formal expropriations or regulatory coercion. According to a study conducted by the London School of Economics, [over 500 Western firms](#) have seen their assets expropriated under various pretexts, including companies in industries ranging from brewing and consumer goods (e.g., [Danone, Carlsberg](#)) to energy (e.g., [Uniper, Fortum](#)). The scope of legislation and Russian domestic case law showing the readiness for expropriation has skyrocketed since the start of the full-scale invasion. Businesses looking to re-enter must expect that their assets would meet a similar fate.

These patterns show a blatant disregard for property rights, investor and shareholder rights, and are a general indicator of an authoritarian government. Accordingly, any western business seeking re-entry faces the [risk of Kremlin](#) decrees that introduce new fees, taxes, and price controls; limit the repatriation of profits and dividends; restrict asset sales and management decisions; and expropriate private businesses.

Russia's [macroeconomic](#) environment further devalues the case for re-engagement. Interest rates have soared to 21%, labour shortages are worsening, and consumer purchasing power has significantly declined. The country's middle class is shrinking, and the infrastructure that once supported international trade and investment has deteriorated.

Meanwhile, Russia's own officials have stated that returning businesses should [not expect to be treated on equal footing](#) with local firms. As Vladimir Putin confirmed, those seeking re-entry would be [disadvantaged](#) to ensure the competitiveness of local businesses. Many Western brands have already been [replaced](#) by domestic or Chinese alternatives, making it difficult, if not impossible, for companies to regain their former market position. Rebuilding operations in such a climate would require substantial financial investment with little certainty of return, naturally concerning investors. Russian policy is confirmed to be favourable towards domestic production and market share.

The Russian legislative framework continues to pose a high risk of business complicity in the war. Under [Federal Law No. 31-FZ](#) businesses, including international companies that are operating on a full or limited scale in Russia, are required to conduct military registration of the staff if at least one of the employees is eligible for military service. They must also assist with delivering the military summons to their employees, ensure the delivery of equipment to assembly points or military units, and provide information, buildings, communications, land plots, transport, and other material means of support to the war effort.

Beyond financial and legal exposure, reputational risks remain high. Any company that chooses to return to Russia will be seen as disregarding the human cost of the war in Ukraine. Some Russian officials have even suggested that businesses seeking to re-enter should [contribute financially to the Russian military or establish operations in occupied Ukrainian territories](#). These decisions would directly associate a company's name with a government engaged in an ongoing conflict, one that has been widely condemned for violations of international law. Moreover, they could render the company complicit in violations of international law.

For all these reasons, we strongly urge your company not only to remain outside the Russian market but to take an active role in discouraging others from returning. We ask that you publicly **affirm your commitment to staying out of Russia**, engage with your peers, and use your influence to advocate for continued economic pressure until meaningful conditions for peace and accountability are met.

With so many alternative markets offering greater stability and growth potential, the case for returning to Russia is weak. The financial, legal, and reputational risks outweigh any potential short-term benefits. More importantly, to re-enter the Russian market under current conditions would be to ignore the principles that led to withdrawal in the first place and contradict all principles of ethical business conduct and a business' responsibility to [respect human rights](#).

We hope that your company will make the right decision by refraining from operating in Russia and by using its influence to encourage others in the industry to follow suit.

Trafigura - responding to your letter

External

Inbox



Claire Divver
<Claire.Divver@trafigura.
com>

Mon, Dec 5, 9:54
PM (16 hours
ago)

to me

Dear Ms Nichol

Thank you for your email. Trafigura unconditionally condemns the war, the violence in Ukraine and the humanitarian crisis this is causing and I am happy to clarify the points raised in your letter dated 23rd November.

To respond to the concerns raised by B4Ukraine, please note the following:

- As soon as the war broke out in Ukraine, we condemned Russia's invasion and immediately froze our investment and activities in Russia. We terminated long-term contracts to purchase Russian crude oil and petroleum products from state-owned entities in advance of EU sanctions coming into force on 15 May 2022.
- We subsequently completed the exit of our passive, minority, non-operational 10% investment in Vostok Oil on 13 July 2022. The purchaser, Nord Axis, was an independent, Hong-Kong registered trading company with no connection to Trafigura and not Russian-owned. Trafigura's Compliance department undertook a thorough review of the buyer including its ownership and management structure in line with our

usual stringent compliance procedures. As a result of this exit, Trafigura has no investments in Russia.

- We have confirmed with relevant Western governments that the supply of Russian-origin petroleum products to third countries, including in central and Latin America, has been explicitly exempted from any sanctions or prohibitions, to avoid unintended impacts to the security or affordability of energy supply to these markets. We continue to keep the situation and evolving sanctions requirements under very close and constant review to ensure that we continue to comply with applicable sanctions. We are working with customers to secure alternative sources of supply, to comply with customer requirements and sanctions.
- We reject any suggestion that our actions are inconsistent with the UN Guiding Principles or Trafigura's human rights policy and commitments.

I hope this clarifies your questions and concerns.

Yours sincerely,

On behalf of Trafigura

Claire Divver

Head of Corporate Affairs & Sustainability

Jeremy Weir
Chief Executive Officer
Trafigura Group Pte. Ltd
10 Collyer Quay
#29-00
Ocean Financial Centre
Singapore (049315)

23/11/2022

Trafigura's operations in Russia

Dear Jeremy Weir and Trafigura Leadership Team,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations working to curtail the financial resources enabling the Russian invasion of Ukraine. In the spirit of respect for the fundamental rights of all people, the rules-based international order, and a prosperous global economy, the Coalition expects companies to demonstrate public support for the people, democracy, and territorial integrity of Ukraine; opposition to Russia's war of aggression; and alignment with the UN Guiding Principles on Business and Human Rights (UNGPs).

We request an urgent dialogue regarding potential inconsistencies between Trafigura Group Pte. Ltd's (Trafigura) obligations under international humanitarian and human rights law, as articulated by the UNGPs, and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms.

Trafigura's 2021 [Human Rights Report](#) emphasises the company's respect for human rights and the international framework governing business and human rights, stating:

"We support the UNGPs and we are committed to respecting internationally recognised human rights.' Furthermore, the Report affirms Trafigura's 'endeavour to avoid, mitigate or minimise causing or contributing to adverse human rights impacts through our activities and to address such impacts when they occur. We also seek to prevent or mitigate adverse human rights impacts that are directly linked to our activities through our products, services or operations."

The company's commitment to human rights is further formalised in its 2016 [Corporate Responsibility Policy](#), 2021 [Modern Slavery Statement](#) and 2021 [Sustainability Report](#), where Trafigura declares an additional pledge of adhering to the Voluntary Principles on Security and Human Rights and the United Nations Global Compact.

It has been eight months since Russia invaded Ukraine and the devastating impacts continue to shock the world. Russia is committing war crimes and crimes against humanity through attacks on civilians and civilian infrastructure, including mass executions, the bombing of schools, hospitals, and apartment buildings, sexual violence, torture, and forcible transfer of civilians. More than 15,000

Ukrainians have been killed and injured and millions more have been forced to flee their homes, creating one of the largest humanitarian and refugee crises of modern times.

In response to this unprovoked and unjustified war,¹ more than 130 companies have fully left Russia with hundreds more taking steps to do so. Yet, according to the respected Kyiv School of Economics Institute's #LeaveRussia [company tracker](#), while Trafigura scaled back some business operations in Russia, others continue.

As stated in your 2022 [Interim Report](#) '*Trafigura unconditionally condemns the war in Ukraine*'. Additionally, Trafigura's [Statement](#) regarding the war in Ukraine declares '*unconditional condemn[ation of] the war, the violence in Ukraine and the humanitarian crisis this is causing*.' While we commend the decision to stop purchasing crude oil from Rosneft as of 15 May, cease trading crude with sanctioned Russian organisations, and the move to exit the investments in Vostok Oil, further questions have been raised by the 12 July sale of these shares to the opaque [Nord Axis](#). The Hong Kong based company was incorporated in February 2022 and [little information is known](#) regarding its true ownership, how it was able to acquire Trafigura's interest, or if the sale could lead to further enabling and financing of Russia's illegal war and its violations of international humanitarian and human rights law.

Moreover, Trafigura reportedly continued to sell [Russian diesel](#), specifically 1,68 million barrels to Ecuadorian Petroecuador in six shipments between July and September 2022. As per your 2022 [Code of Business Conduct](#), '*Trafigura complies with all applicable sanction laws and regulation*.' However, the reporting of the aforementioned sale raises concerns about the circulation of Russian fuel despite EU initiated boycotts. As you are aware, the EU introduced a ban on the direct or indirect purchase, import, or transfer of crude oil or petroleum products originating in Russia or exported from Russia into the EU and to third countries. If the reports are correct, these activities risk enabling and financing Russia's violations of IHL and human rights law during the ongoing invasion and occupation of Ukraine.

We seek to understand how Trafigura has conducted and continues to conduct heightened human rights due diligence, per its stated policy and the UNGPs concerning due diligence in conflict-affected areas, and how the findings of such a process has resulted in these continued business activities and relationships. As noted by the UNGPs:

...the more severe the abuse, the more quickly the enterprise will need to see change before it takes a decision on whether it should end the relationship. In any case, for as long as the abuse continues and the enterprise remains in the relationship, it should be able to demonstrate its own ongoing efforts to mitigate the impact and be prepared to accept any consequences – reputational, financial or legal – of the continuing connection.

With the above points in mind and in consideration of B4Ukraine's [Declaration](#), we request an urgent dialogue with Trafigura's relevant senior management and staff to discuss the company's ongoing activities and relationships in Russia, associated risks to the people of Ukraine and the company, and potential steps to prevent/mitigate these risks. Please contact Eleanor Nichol at enichol@b4ukraine.org to schedule a call at your earliest convenience before the 7th November 2022.

¹ The UN General Assembly condemned Russia's "aggression against Ukraine" and demanded that Moscow "unconditionally withdraw all of its military forces from the territory of Ukraine within its internationally recognized borders."

Sincerely,

Eleanor Nichol
Executive Director
The B4Ukraine Coalition

CC: Mike Wainwright, Jose Maria Larocca, Andrew Vickerman, Pierre Lorinet, Sipko Schat, and Mark Irwin