**Business & Human Rights Resource Centre Survey Questions**

**For companies operating or investing in Ukraine**

**Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Ukraine? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

***Just over a decade. Until recently we were invested in Ukrainian gas production. This was divested in late 2021. We have a trading presence, largely trading LPG and natural gas. We have 10+ employees in Ukraine.***

**Assessing risks**

1. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?
   1. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

***We are in constant contact with the impacted employees and will afford them the support they need.***

**Mitigating risks and tracking effectiveness**

1. What measures is your company or subsidiary taking to ensure that your business relationships, products, services, operations, or other actions do not contribute to Russian military activities or occupation in Ukraine (including Crimea and occupied parts of Donetsk and Luhansk Oblasts)?

***Vitol’s business is the trading of gas and LPG. We operate in full compliance with sanctions. We do not deal with entities in Crimea and the occupied parts of Donetsk and Luhansk Oblasts. We are not taking on any new customers in the country.***

1. Is your company or subsidiary planning to scale-down or suspend your operations in Ukraine? If so, what are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate the negative impacts of this decision on affected communities and your workers?

***No decisions have been made to date. Regardless of what decision is reached, we will continue to support our impacted employees as best we can.***

1. What steps is your company or subsidiary taking to ensure that your risk prevention and/or mitigation measures do not negatively impact Ukrainian civilians?

***We shall continue to deliver on our contracts whilst practicable.***

**Exercising leverage**

1. Is your company or subsidiary taking any other actions to promote respect for humanitarian law, human rights, democracy, and peace in Ukraine?

***At this point in time our focus is on ensuring the safety and wellbeing of our employees in Ukraine.***

**For companies operating or investing in Russia**

**Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Russia? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

***For 30+ years Vitol has engaged in the export of hydrocarbons from Russia. We have a Moscow office. We also have a small (less than 5%), passive illiquid interest in an upstream asset controlled by Rosneft.***

**Assessing risks**

1. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?
   1. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

***An enhanced due diligence regime is implemented in high-risk situations. Management is in regular contact with impacted employees.***

**Mitigating risks and tracking effectiveness**

1. As the situation in Ukraine unfolds, is your company or subsidiary planning to cease operations in or divest from Russia? If so:
   1. What have been the key considerations informing this decision and did you consult with your workers and/or other affected stakeholders as part of your decision-making process?
   2. What are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate any negative impacts of your exit on affected communities and your workers, including addressing any loss of income?

***No decision has been made. A key consideration will be the welfare of our employees in Russia.***

1. If your company or subsidiary chooses to continue operating in Russia, what human rights due diligence has been undertaken and how are you planning to mitigate harm in Ukraine?

***No decision has been made.***

1. What kind of due diligence measures does your company use to ensure that it does not have any business relationships with sanctioned Russian individuals and entities? Beyond sanctions compliance, how does your company ensure that it does not have any business relationships with individuals or entities with a track record of rights violating conduct?

***We have in place a rigorous compliance programme which includes a comprehensive Know Your Customer (KYC) process. For counterparties operating in high-risk jurisdictions, there is an enhanced due diligence process.***

**Exercising leverage**

1. How does your company intend to use your leverage to protect the rights of your workers and communities affected by your operations in Russia, including freedoms of association and expression?

***Vitol respects the laws and regulations of all the countries in which it operates. Our primary focus is the wellbeing of our employees.***

1. Is your company providing any support to Russian activists who are taking action against the war and in support of democracy and peace in Ukraine?

***Vitol has no political affiliations. Our charitable foundation provides assistance and relief to refugees worldwide.***