Jurisdictions involved in Friends in Low Places

There are several reasons why the facts exposed in this report engage anticorruption authorities in the UK, US and Switzerland:

The UK: One of Vitol's six main offices, a major oil trading centre, is in London; its former CEO (now chairman) Ian Taylor is a pillar of the British establishment. New CEO Russel Hardy is British and top executives largely sit in London. Its subsidiary Cockett Marine has one of its major offices in the UK. Meanwhile companies and bank accounts used by the middlemen in this report were in the British Virgin Islands and Cayman Islands, both British overseas territories. Glencore is one of the biggest companies on the London Stock Exchange. The UK branch of its subsidiary Ocean Connect Marine made payments to the Kotronakis duo. Seaview Shipping and Trading, the Kotronakis company receiving Glencore's money, is UK-registered.

The US: Houston is home to a major Trafigura oil-trading operation. Vitol's biggest office is there, also a large oil-trading base. Houston was also where Bo Ljungberg met Mike Loya, mandated by the Brasil Trade collective to discuss business. Cockett Marine has a US branch. Several Ocean Connect Marine payments were made from the US. Dollars were used in almost all transactions, a justification to act under the Foreign Corrupt Practices Act.

<u>Switzerland</u>: Vitol's head office is in Geneva and Glencore's is in the canton of Zug. Trafigura has a major oil trading base in Switzerland. Key Car Wash players involved, including Paulo Roberto Costa himself, used Swiss bank accounts.