

Company Name Glencore
Industry Agricultural Products (Supply Chain only) & Extractives
UNGP Core Score (*) 19.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
19.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states in its Code of Conduct: ' We uphold the dignity, fundamental freedoms and human rights of our employees, contractors and the communities in which we live and work, and others affected by our activities. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: In addition, it indicates in its Human Rights Policy that: 'The policy is developed in accordance with the Universal Declaration of Human Rights, the International Labour Organisation (ILO) Core Conventions on Labour Standards, the Equator Principles, and the United Nations (UN) Guiding Principles on Business and Human Rights'. [Human Rights Policy, 2015: glencore.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company's Human Rights Policy, which is also part of the Code of conduct, explicitly commits it to respect all the ILO core labour rights: 'We do not tolerate any form of workplace discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We seek to reflect the diversity of the communities in which we operate within our workforce. We respect the rights of our employees and contractors, including the freedom of association and collective bargaining.' [Human Rights Policy, 2015: glencore.com & Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Met: UNGC principles 3-6: See above • Met: Explicitly list All four ILO for AG suppliers: As indicated above the Code of Conduct cover all ILO core, including freedom of association and collective bargaining: 'We respect the rights of our employees and contractors, including the freedom of association and collective bargaining. In its Code of Conduct, the Company states: 'This Code applies to all of the marketing and industrial business that we control. It applies to all permanent and temporary employees, directors an officers as well as contractors (when they are under a relevant contractual obligation) to the business.' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Met: Explicitly list All four ILO apply to EX BPs: As indicated above the Code of Conduct cover all ILO core, including freedom of association and collective bargaining: 'We respect the rights of our employees and contractors, including the freedom of association and collective bargaining. In its Code of Conduct, which cover all ILO core, the Company states: 'This Code applies to all of the marketing and industrial business that we control. It applies to all permanent and temporary employees, directors an officers as well as contractors (when they are under a relevant contractual obligation) o the business.' In addition, the Company encourages its contractors or joint venture partners to adopt similar policies and procedures: 'In our dealings with our business partners, including contractors, suppliers and joint venture partners, we encourage them to respect and comply with our approach to human rights, or one of an equivalent standard.' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company's Human Rights Policy, which is also part of the Code of conduct, explicitly commits it to respect all the ILO core labour rights: 'We do not tolerate any form of workplace

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			<p>discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We seek to reflect the diversity of the communities in which we operate within our workforce. We respect the rights of our employees and contractors, including the freedom of association and collective bargaining.' [Human Rights Policy, 2015: glencore.com & Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: In its Code of conduct it states: 'The safety of our people is our number one priority. We believe that all fatalities, occupational diseases and injuries are preventable and that we must all take responsibility for maintaining a safe and healthy workplace' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Met: H&S applies to AG suppliers: The Company states in its Code of Conduct: 'We seek to ensure that our suppliers, including contractors, maintain: lawful business practices; agreed standards of quality and timeliness of delivery; safe, healthy and fair workplaces; zero tolerance for human rights violations, in relation to both their people and the communities in which they work; and business practices that minimise environmental impact.' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Met: H&S applies to EX BPs: See above [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: In its Code of Conduct, the Company states: 'We are committed to communicating regularly, openly and accurately with our employees, contractors, customers, suppliers, local communities, and investors, as well as appropriate associations, governments and other stakeholders'. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company states in its Human Rights Report: 'Our Group Human Rights Policy captures the minimum requirements related to human rights. We require our assets to: [...]; Conduct systematic engagement and consultation with affected groups to enable their meaningful participation in decisions affecting them [...]'. However, no evidence found of a commitment statement to do so in the Company's Human Rights Policy. [Human Rights Report 2019, 19/06/2020: glencore.com] • Met: Regular stakeholder design engagement: As an example of 'Respecting human rights during project development', the Company reports on the case of the Aurukun Bauxite Project: '[...] we have been engaging with the Aurukun community, particularly the Wik Waya families who we identified as directly affected Traditional Owners [...]. The Project designed the engagement process with the Traditional Owners to: [...] Give them sufficient time to contribute to project decisions and discuss ways to maximise opportunities and minimise potential impacts'; and the Raglan Mine: 'In Québec, mining operations are required to review their mine closure plan every five years. To address the concerns of our Inuit partners, Raglan Mine invited members from the host communities to participate in the mine closure planning process. [...] The objectives of the Subcommittee are to safeguard Inuit land use, resources and ecological integrity; create benefits and build capacity in local Inuit communities; and ensure the transfer of skills, knowledge and values between Inuit and industry to ensure efficient, safe and long-term solutions to closure and remediation at Raglan Mine.' In addition, it summarizes in a table the objectives of the 'Community and stakeholder engagement' as one of the key processes that support our human rights programmes: 'Identify relevant, potentially impacted stakeholders; Inform human rights risks assessments and/or impact assessments; Determine if risk management activities are appropriate and effective; Consult on design and effectiveness of grievance mechanisms; Participate in multi-stakeholder forums to understand and discuss best practice/lessons learned'. [Human Rights Report 2019, 19/06/2020: glencore.com]
A.1.5	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states in its Human Rights Report: 'Our Group Human Rights Policy captures the minimum requirements related to human rights. We require our assets to: [...] ; Develop adequate controls to prevent, mitigate or remediate adverse human rights impacts; [...]. If assets have caused or contributed to an adverse human rights impact they are required to report the incident internally and provide or participate in effective remediation, giving

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>particular attention to vulnerable and previously disadvantaged groups'. [Sustainability Report 2019, 05/2020: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company indicates in its Human rights report: 'Neither Glencore's Raising Concerns platform nor local grievance mechanisms impede access to judicial or administrative remedies. Glencore cooperates with state-based non-judicial grievance mechanisms'. [Human Rights Report 2019, 19/06/2020: glencore.com] • Not met: Work with AG suppliers to remedy impacts: The Company expects its suppliers to respect the UN Guiding Principles, having processes including 'processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute'. Also, the Company establishes corrective action processes in case of non-compliances and in case unacceptable level of risk is identified. However, it is not clear whether the company will work with them to remedy through the suppliers mechanisms and or through collaborating with them in the development of third party non-judicial remedies. [Supplier faqs, N/A: glencore.com & Supplier standards, 2019: glencore.com] • Not met: Work with EX BPs to remedy impacts: See above. The Company clarifies that for the purposes of supplier standards, 'a supplier is any individual, organisation or company that provides, sells or leases materials, products or services directly to Glencore companies, including contract workers'. However, not clear how the company works with suppliers to remedy HR impacts. [Supplier standards, 2019: glencore.com & Supplier faqs, N/A: glencore.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact. • Met: Senior responsibility for HR: The Company indicates that 'the head of each function has day-to-day responsibility for ensuring respect for human rights within the areas for which they are accountable [...] Together, heads of each corporate function are part of an internal human rights steering committee [...]. The steering committee is led by the Head of Sustainable Development and reports on group-wide human rights performance to our senior management team, which includes the heads of the commodity departments and the Board HSEC Committee'. In addition, it indicates in its Human Rights Report 2019: 'In 2019, we hired a new Group General Manager who is responsible for overseeing the implementation of our human rights policy across the business [...]' [Human rights report 2018, 2019: glencore.com & Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: In its '2018 Our approach to sustainability' document, the Company indicates: 'Our Group sustainability team and departmental sustainability leads provide guidance and thought leadership. [...] It develops and oversees implementation of sustainability policies and improvement programmes, as well as delivering relevant assurance processes. The team also reviews the sustainability aspects of our Code of Conduct and revises them as necessary. It provides regular updates to the HSEC committee, both formally through the committee's scheduled meetings, and on an ad hoc basis when required. Our Group sustainability team and departmental sustainability leads deal with catastrophic and fatal hazard management, mitigation of environmental impacts, identifying relevant trends, management of community relations and engagement with local stakeholders. They also take responsibility for product stewardship, and record and report progress against KPIs. They are responsible for engagement with other external stakeholders as well, analysing their perceptions of Glencore, understanding their expectations and translating them into practice on the ground. [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: Day-to-day responsibility for AG in supply chain: The Company also states that 'the head of each function has day-to-day responsibility for ensuring respect for human rights for which they are accountable'. For example, 'procurement has responsibility for our supply chain'. However, no further details found. [Human rights report 2018, 2019: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Day-to-day responsibility for EX BRs: According to its Human Rights Report 2018: 'the head of each function has day-to-day responsibility for ensuring respect for human rights for which they are accountable'. For example, 'procurement has responsibility for our supply chain'. In addition, in its Human Rights Report 2019, it indicates: 'In 2019, we hired [...] a Responsible Sourcing Manager who is responsible for our human rights due diligence programme for metals, minerals and energy products.' [Human rights report 2018, 2019: glencore.com & Human Rights Report 2019, 19/06/2020: glencore.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates: 'Sustainability risk management across the Group is based on our general approach to the identification, assessment and mitigation of risk. [...] We require our assets to provide resources and training on our risk management processes for both employees and contractors. The Glencore risk management framework and its supporting guidelines apply to all the assets over which we have operational control. The framework is aligned with international standards and provides a standardised approach to managing risk relating to health, safety, environment, community, human rights, [...] Our assessment process begins with a Group-wide review of material topics at global and local levels. This identifies topics raised during structured engagement activities, by a broad range of internal and external stakeholders. It considers the issues that affect our peers and the entire sector, assessing media coverage and feedback from local communities. In addition, we take into account geographic, economic, social and other locally-appropriate factors. Our approach recognises that risks identified at local and regional levels may differ to those salient at a Group level. Our decentralised business model supports the corporate and asset teams managing, mitigating and eliminating risks as appropriate.' In addition, in its Human Rights Report: 'We regularly evaluate our salient human rights risks through engagement with internal and external stakeholders, risk assessments completed by our assets and our analysis of changes in the industry and the social, economic and political context in our host countries'. [Our Approach to Sustainability - 2018, 2018: glencore.com & Human Rights Report 2019, 19/06/2020: glencore.com] • Met: Identifying risks in AG suppliers: See above [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Identifying risks in EX business partners: See above [Our Approach to Sustainability - 2018, 2018: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: In addition, it states: 'We maintain a register of HSEC risks and management plans and continually monitor and review performance against these plans, communicating risks and responsibilities to the relevant stakeholders. We also undertake regular internal reviews of our risk management effectiveness as part of our continuous improvement process.' [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: In consultation with stakeholders: As indicated above, topic identification includes those aspect raised during structured engagement activities, by a broad range of internal and external stakeholders. It considers the issues that affect our peers and the entire sector, assessing media coverage and feedback from local communities. [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: In consultation with HR experts: The Company also reports: 'In 2019, our PetroChad (Mangara) (PCM) oil and gas operations updated their Environmental and Social Impact Assessment (ESIA) with support from third party experts.' However, it is not clear whether this is an isolated example or a general practice. [Human Rights Report 2019, 19/06/2020: glencore.com] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR) • Not met: Explains use of HRIAs or ESIA (inc HR)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): As indicated in the previous indicator, the Company describes a process to identify and assess its human rights risks: 'Sustainability risk management across the Group is based on our general approach to the identification, assessment and mitigation of risk. [...] The Glencore risk management framework and its supporting guidelines apply to all the assets over which we have operational control. The framework is aligned with international standards and provides a standardised approach to managing risk relating to health, safety, environment, community, human rights, and financial, legal and reputational matters. [...] Our assessment process begins with a Group-wide review of material topics at global and local levels. This identifies topics raised during structured engagement activities, by a broad range of internal and external stakeholders. It considers the issues that affect our peers and the entire sector, assessing media coverage and feedback from local communities. In addition, we take into account geographic, economic, social and other locally-appropriate factors. Our approach recognises that risks identified at local and regional levels may differ to those salient at a Group level.' [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Public disclosure of salient risks: The Company indicates in its Human rights report: 'We have identified six salient human rights risks across the Group: labour rights, safety, health, security, inequality and water. Our salient risks assessment considers risks to people'. [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: In its human rights report, for each human right risk identified and assessed as salient, the Company describes the risk and the approach to manage each specific case. As indicated in b.2.2, the Company describes how it manages risks related to labour rights, safety, health, inequality, security and water in specific places. [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: Including in AG supply chain • Not met: Including amongst EX BPs: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Met: Example of Actions decided: In relation to water, for instance, the Company indicates that 'industrial mining activities are often water intensive and some of our assets are located in water-scarce regions [in South Africa]. We continually look for ways to improve our operational processes and/or invest in technologies to reduce water consumption, increase water reuse and improve the quality of water discharged'. The Company disclose a couple of examples. In one of them, the company reports operations in an area with medium to high-risk levels for access to water. The Company has designed and 'established a water treatment plant to treat excess mine water and provide drinking water for the community. Based on the success of this programme, we are investigating the viability of a similar approach at our operations in Middelburg, where excess water is currently treated and discharged'. [Human rights report 2018, 2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company indicates in the human rights report 2018 that the steering committee conducted a review to examine the implementation of the human rights policy. The review showed that there were four priority areas for improvement including business partners, training and capability building, grievance mechanisms and incident tracking and reporting. In addition, in its Human Rights Report 2019, it indicates: 'We require our assets to set up monitoring and review processes to meet the requirements of the Group Human Rights Policy, and implement risk controls and corrective actions, whenever relevant, to continually improve human rights performance.' However, no evidence found of a system to check if actions carried out to mitigate specific human rights risks are effective, as current evidence refers to gaps in specific company's processes, not measuring whether there have been improvements following actions. [Human rights report 2018, 2019: glencore.com & Human Rights Report 2019, 19/06/2020: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. It seems to focus in lessons learnt after the incident, rather than from checking the effectiveness of actions implemented. [Human Rights Report 2019, 19/06/2020: glencore.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 • Not met: Including EX business partners: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: The Company indicates that 'there have been allegations of heavy metal contamination in the soil and water around our Antapaccay and Cerro de Pasco mines in Peru'. The Company's response is the following: 'Antapaccay has water monitoring and treatment measures in place to ensure that their operations do not affect water quality or availability. The Agency for Assessment and Environmental Control, which forms part of Peru's Ministry of Environment, conducts audits of their water treatment testing. These audits have found no evidence of that Antapaccay's operational practices cause pollution or that the high level of heavy metals in the blood of some local inhabitants relates to Antapaccay. Antapaccay has implemented a monitoring programme with local community participation'. In relation to Cerro de Pasco, the Company indicates that 'we recognise that historical mining practices, which took place over many years under previous owners, resulted in some environmental challenges [...] The site is focusing on strengthening its measurement and management of environmental controls, including the monitoring of any emissions to air, soil and water [...] while no exceedances of air quality limits have occurred since 2006, we continue to monitor performance'. No new relevant evidence found in latest reports. [Human rights report 2018, 2019: glencore.com] • Met: Ensuring affected stakeholders can access communications: Following the case of Antapaccay described above, the Company indicates that Antapaccay 'publicly communicates the monitoring results to demonstrate compliance with the environmental levels established by Peruvian law. The results are also available in the local Quechua language to provide the local communities with access to the information'. Also, as indicated above, the local community participates in the monitoring programme. [Human rights report 2018, 2019: glencore.com]

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The code contains a 'Raising Concerns programme' which allows people to raise concerns on an anonymous basis. The Company states that it 'recognises that in some of our operating countries less than half of the population has internet access' and has provided phone numbers (free of charge) for raising concerns, 'which are communicated through notice boards'. It added 'the Raising Concerns programme is accessible by substantially all of our employees and contractors'. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Sustainability Report indicates: 'In 2019, we reported zero serious human rights incidents, compared to one in 2018. During the year, we received 1,149 complaints that mainly related to access to property (26%) [...], noise (21%),[...] and odour or fumes (18%) [...]'. However, no information found regarding the total number of human rights-related incidents that were filed, addressed or resolved. [Sustainability Report 2019, 05/2020: glencore.com] • Met: Channel is available in all appropriate languages: The Company indicates: 'If one of our permanent or temporary employees, contractors, suppliers or other stakeholder encounters a situation that appears to breach Glencore's Code of Conduct or our policies, they can choose to report this through local channels, with a supervisor or manager. [...] The specific mechanisms vary to reflect local conditions, such as internet availability and languages spoken, to ensure ease of use. Calls to the local Raising Concerns number are free of charge and are routed to a local compliance person who speaks the local language. [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Opens own system to AG supplier workers: The supplier standards document (which includes everyone in the term supplier) states that 'everybody working for Glencore (including suppliers) must promptly raise any situations in which the Glencore Code of Conduct, its underlying policies, including these supplier standards, or the law appears to be breached with a supervisor or a manager, or with a local procurement contact. We also encourage other stakeholders to raise them with the relevant site. Where a concerns remain unsolved through these local channels, or should an employee, contractor, supplier or other stakeholder, for whatever reason and at any time, feel uncomfortable utilising the local channels to resolve their concerns, the concern can be raised via Glencore's 'Raising Concerns' web platform' at the website. [Supplier standards, 2019: glencore.com & Raising concerns, N/A: glencore.raisingconcerns.org] • Met: Opens own system to EX BPs workers: The supplier standards document (which includes everyone in the term supplier) states that 'everybody working for Glencore (including suppliers) must promptly raise any situations in which the Glencore Code of Conduct, its underlying policies, including these supplier standards, or the law appears to be breached with a supervisor or a manager, or with a local procurement contact. We also encourage other stakeholders to raise them with the relevant site. Where a concerns remain unsolved through these local channels, or should an employee, contractor, supplier or other stakeholder, for whatever reason and at any time, feel uncomfortable utilising the local channels to resolve their concerns, the concern can be raised via Glencore's 'Raising Concerns' web platform' at the website. [Supplier standards, 2019: glencore.com & Raising concerns, N/A: glencore.raisingconcerns.org]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company indicates that it 'operates grievance mechanisms at all its operations for its stakeholders'. The mechanisms are reported to include 'free mobile SMS hotlines, complaints registers and dedicated offices within local communities'. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Sustainability Report 2019, 05/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The raising concerns platform, available to all, is available in more than 20 languages, and seems to automatically use the language of the country from which the user is connecting. [Raising concerns, N/A: glencore.raisingconcerns.org] • Met: AG supplier communities use global system: The Company indicates in its Code of Business that its grievance mechanism is available for all its stakeholders, and in its document 'Our approach to sustainability' states that: 'If one of our permanent or temporary employees, contractors, suppliers or other stakeholder encounters a situation that appears to breach Glencore's Code of Conduct or our policies, they can choose to report this through local channels, with a supervisor or manager. [...] The specific mechanisms vary to reflect local conditions, such as internet availability and languages spoken, to ensure ease of use. Calls to the local Raising Concerns number are free of charge and are routed to a local compliance person who speaks the local language. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: EX BPs communities use global system: The supplier standards document (which includes everyone in the term supplier) states that 'everybody working for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Glencore (including suppliers) must promptly raise any situations in which the Glencore Code of Conduct, its underlying policies, including these supplier standards, or the law appears to be breached with a supervisor or a manager, or with a local procurement contact. We also encourage other stakeholders to raise them with the relevant site. Where a concerns remain unsolved through these local channels, or should an employee, contractor, supplier or other stakeholder, for whatever reason and at any time, feel uncomfortable utilising the local channels to resolve their concerns, the concern can be raised via Glencore's 'Raising Concerns' web platform' at the website. [Supplier standards, 2019: glencore.com & Raising concerns, N/A: glencore.raisingconcerns.org]
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Describes how remedy has been provided: The Company indicates in its Human Rights Report: 'In 2019, our PetroChad (Mangara) (PCM) oil and gas operations updated their Environmental and Social Impact Assessment (ESIA) with support from third party experts. PCM recognises its operations may have negative social or environmental impacts on people near the operating areas. [...] To inform the work the team consulted subject matter experts and conducted a survey of the impacts within the local communities. Based on the research, the team outlined three compensation methods: in-kind, financial and training. Affected persons or communities will have the opportunity to highlight their preferred compensation method for review. The framework details compensation rates for a variety of potential losses including buildings, cultural sites, crops and domestic animals. [...] For example, in 2018, following a berm breach at a water containment area, flooded water passed over local farmland towards a local river. We received a number of complaints from local farmers regarding the damage floodwater did to their crops. In line with PCM's government-approved grievance mechanism and the compensation rates set out in the framework, PCM investigated each case, in the presence of the affected farmers, the village chief and a representative from PCM. Where it was agreed that damage had been caused, the farmers received compensation in line with the framework'. [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Changes introduced to stop repetition: The Company reports that there were thirteen deaths at its managed operations in 2018: 'we have determined that the incidents leading to these deaths were connected to four of the fatal hazards covered by our established fatal hazard protocols: mobile equipment, ground and/or strata failure; working at height; and energy isolation. In light of these findings, each department is renewing its focus on these four hazards in its annual safety plan. In addition, our assurance activities are prioritising these hazards'. No new relevant evidence found in latest reports. [Human rights report 2018, 2019: glencore.com] Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Headline: 20 people die in a collision involving a Glencore truck in DRC Area: Health & safety Story: On February 22, 2019, a truck owned by a contractor for a Glencore PLC mining company in the Democratic Republic of Congo, Mutanda Mining, collided with two people carriers about 50km from the site, killing 20 and injuring 9. Mutanda said in a statement that it will work with "relevant government agencies, including the emergency services, to provide support to [the victims] and to the local communities." Sources: [The Times - 23/02/2019: thetimes.co.uk][The Wall Street Journal - 22/02/2019: wsj.com][Mining Weekly - 22/02/2019: miningweekly.com]
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public response available [Glencore comments to Mining Weekly, 22/02/2019: miningweekly.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Response goes into detail: In an emailed statement to Mining Weekly Online, Glencore stated: "Glencore can confirm that Mutanda Mining (Mumi) assisted the local emergency services in a rescue operation when an acid truck collided with two people carriers about 50km from the site. The incident took

Indicator Code	Indicator name	Score (out of 2)	Explanation
			place at around 6pm on 20th February. Tragically around 20 people lost their lives in the collision. The truck belonged to a third-party logistics company contracted by Mumi for the transport of sulphuric acid to site. Our condolences go to the families and friends of those that have been impacted by this devastating event. Mumi will continue to work with the logistics company and relevant government agencies, including the emergency services to provide support to them and to the local communities." [Glencore comments to Mining Weekly, 22/02/2019: miningweekly.com]
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Glencore states that "Safety is our [Glencore's] top priority. We aim to become a safety leader in our industry, creating a workplace without fatalities, injuries or occupational diseases." Additionally, Glencore's Supplier Code states that "We believe that all fatalities, injuries and occupational diseases are preventable and expect our suppliers to take the necessary responsibility for maintaining safe and healthy workplaces. We expect our suppliers to: Comply with all applicable laws and regulations to ensure a safe and healthy working environment; Provide a safe and healthy working environment, including appropriate personal protective equipment; Provide regular health and safety training to their workforce; Have appropriate policies and controls protecting the safety and health of their workforce." [AG - Health and Safety, N/A & Supplier standards, 2019: glencore.com] • Met: Policies apply to the type of business relationships involved: Glencore expects its Supplier Standards will be incorporated, by reference, into all supplier contracts. In addition, when working on a Glencore site, all suppliers must also comply with site-specific requirements. [Supplier standards, 2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Glencore states that it has a health and safety incident reporting process. Additionally, the company has disclosed on the number of casualties involved in the incident and provides qualitative information related to injury rates or lost days and fatalities in its human rights reports. [Human rights report 2018, 2019: glencore.com & Glencore comments to Mining Weekly, 22/02/2019: miningweekly.com]
E(1).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: Although Glencore has offered its apologies and stated that its subsidiary Mutanda Mining (Mumi) will continue to work with the logistics company and relevant government agencies, including the emergency services to provide support to them and to the local communities, it does not appear to have engaged directly with the affected stakeholders. [Glencore comments to Mining Weekly, 22/02/2019: miningweekly.com] • Met: Encourages linked business to engage affected stakeholders: Glencore has stated that its subsidiary, Mutanda Mining (Mumi), will continue to work with the logistics company and relevant government agencies, including the emergency services to provide support to them and to the local communities.? [Glencore comments to Mining Weekly, 22/02/2019: miningweekly.com] • Not met: Provides remedies to affected stakeholders: Glencore has offered its apologies and stated that its subsidiary Mutanda Mining (Mumi) will continue to work with the logistics company and relevant government agencies, including the emergency services to provide support to them and to the local communities. However, there is no information on whether it provided remedies to the victims or their families. [Glencore comments to Mining Weekly, 22/02/2019: miningweekly.com] • Met: Has reviewed management systems to prevent recurrence: According to its HR report of 2019, the company investigated the case and 'worked with the contractor to identify the root causes of the accident. The learnings were captured and appropriate measures put in place to avoid a repeat of this incident. Internally, the incident prompted a review of our Road Transportation Protocol. We convened two workshops for approximately 80 experts across the business to ensure our requirements are clear and fit for purpose. The workshops identified a series of improvements and we are rolling out the updated protocol in 2020 across our global operations and marketing divisions.' [Human rights report 2018, 2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Has improved systems and engaged affected stakeholders: The company improved its systems in light of the incident but didn't engage with stakeholder affected by the allegation
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Peruvian community protests Glencore's land annexation • Area: Right to security; Land rights • Story: Twenty-two members of communities surrounding the Tintaya and Antapaccay mines have filed a complaint against Glencore in the High Court in London, claiming the company should be held liable for the killing, injury and unlawful detention of protestors in the Espinar Province of Peru. The abuses were allegedly perpetrated by the Peruvian National Police and occurred during a disturbance near the Tintaya mine in May 2012. The case was heard in October 2017 in the High Court in London. The original claim was brought against Xstrata which was merged with Glencore in 2013. Since the remedial action is still disputed this allegation is still valid. On December 29, 2018, farmers held a protest against the Antapaccay mine, owned by Glencore, when the company began removing land from an area that they claim has been their property for many years. Francisca Umasi-Ihui and Vidal Coaquira-Umasi, who were participating in protests, were allegedly attacked by armed security company Grupo Liderman (part of Carlyle Group) and police officers. Four members of Antapaccay's security team were also reportedly injured during this event. According to press sources, it was not the first time that security of the mine tried to intimidate local community. In March 2018, security guards allegedly threatened to kill farmers if they not accept to leave their land. • Sources: [The Guardian, 31/10/2017: theguardian.com][Telesur 01/11/2017: telesurtv.net][Leigh Day - 24/02/2016: leighday.co.uk][La Republica - 10/02/2019: larepublica.pe]
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Guardian reported that 'the Company [Glencore] denies liability, arguing that police protection was necessary since thousands of protesters, many carrying traditional slingshots, were marching towards the mine. Xstrata also said that the Peruvian national police operated independently and it had no control over their behavior. In response to the confrontation that occurred on December 29, 2018, Glencore issued a letter acknowledging the incident, calling it "regrettable." [Glencore response letter addressed to Ms Zbona, Ms Romero and Mr Lazala, 15/02/2020: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: In response to the confrontation that occurred on December 29, 2018, Glencore issued a letter stating that "Glencore is aware of allegations made by Ms Umasi and Mr Coaquira in respect of December event which occurred inside Antapaccay's land. This event is regrettable. We understand that four members of Antapaccay's security team were injured during this event. Glencore takes very seriously our human rights commitment towards communities where we and our business partners operate, and we expect our business partners to do the same." Glencore also said that it will be undertaking an independent review of the recent event. [Glencore response letter addressed to Ms Zbona, Ms Romero and Mr Lazala, 15/02/2020: business-humanrights.org]
E(2).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised: Regarding land rights Glencore states in its CoC that "We acknowledge that our operations have the potential to impact the communities where we operate. Where appropriate, we restore the livelihoods and standards of living of communities or individuals that have been displaced as a result of our activities". However this is not a commitment to respecting ownership of land, and thus credit cannot be given. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Met: Policies apply to the type of business relationships involved: In its CoC, Glencore says "This Code applies to all of the marketing and industrial businesses that we control. It applies to all permanent and temporary employees, directors and officers as well as contractors (where they are under a relevant contractual obligation) to these businesses...when we enter into joint ventures where we are not the operator, we seek to influence our partners to adopt similar policies and procedures to those of Glencore wherever possible." [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: . The company is a participatory member of the Voluntary Principles on Security and Human Rights. However the company doesn't describe how it identifies legitimate rights of land tenure. [Human rights report 2018, 2019: glencore.com]
E(2).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: Glencore has responded to the allegation and is undertaking an independent review of the event. [Glencore response letter addressed to Ms Zbona, Ms Romero and Mr Lazala, 15/02/2020: business-humanrights.org] • Met: Provides remedies to affected stakeholders: In response to the incident, Glencore is undertaking an independent review of the recent event. If, following the independent review, it is determined that any of Antapaccay's team reacted in a way that is not consistent with our Code of Conduct, security and human rights policies and training, Glencore will then take appropriate action. [Glencore response letter addressed to Ms Zbona, Ms Romero and Mr Lazala, 15/02/2020: business-humanrights.org] • Not met: Has reviewed management systems to prevent recurrence [Glencore response letter addressed to Ms Zbona, Ms Romero and Mr Lazala, 15/02/2020: business-humanrights.org] • Not met: Denies allegations, but has engaged affected stakeholders: The Guardian article reported that 'the Company denies liability, arguing that police protection was necessary since thousands of protesters, many carrying traditional slingshots, were marching towards the mine. It also said that the Peruvian national police operated independently and it had no control over their behaviour'. • Not met: Denies allegations, but reviewed systems to prevent such impacts <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Glencore accused of health & safety violation, union busting and pollution in Colombia • Area: FoA and CB • Story: On August 2nd, 2018, IndustriALL Global Union published a case study regarding Glencore's activities in Colombia, claiming that allegations of corruption and severe human rights violations with the local union were raised as since 2006. Among others interests, Glencore owns subsidiary Prodeco, which operates two adjacent mines (La Jagua and Calenturitas), a coal export terminal (Puerto Nuevo) and a stake in the railway that transports coal to the terminal. Prodeco employs about 6,000 people. According to IndustriALL's affiliate Sintracarbón, workers from the La Jagua and Calenturitas mines were subject to different terms and conditions while they were managed by the same top management, and were denied the opportunity to negotiate together as a union with a common employer. Sintracarbón claimed that Prodeco violated the right to freedom of association at its Calenturitas mine by discriminating against union leaders and members, by interfering with the right of workers to freely choose their union affiliation, and by undermining the collective bargaining process. Management was also allegedly changing union shifts or positions, and applying drastic disciplinary measures including dismissals or multiple suspensions for the same offence or by sending them on paid leave as a means of marginalizing them. Glencore has allegedly persuaded union members to resign from the union through a combination of threats and incentives. The union alleged that work stability and the right to decent work were undermined, and salaries were affected because conventional benefits did not apply. Short-term contracts were reportedly not renewed if workers joined a union. • Sources: [IndustriALL Global Union - 02/08/2018: industrialunion.org]
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The company provides a public response to the allegations raised by IndustriALL which directly addresses the allegations raised. [Working Practices (responses to allegations), N/A: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company responds in detail to the allegations raised in the article by IndustriALL, addressing the relevant complaints in the IndustriALL article directly. [Working Practices (responses to allegations), N/A: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Prodeco states on its Human Rights webpage that "We are governed by the human rights policy of our parent company, Glencore, which requires us to uphold the rights of our stakeholders, including our people and our local communities. These rights include, but are not limited to, freedom of association and collective bargaining, the right to equal treatment and work, and the prevention of child or forced labour". Additionally in Glencore's 'Code of Conduct' the company says "We recognize and uphold the rights of our workforce to a safe workplace, freedom of association, collective representation, just compensation, job security and opportunities for development". [Code of Conduct, 2017: glencore.com & Prodeco Human Rights Policy, N/A: grupoprodenco.com.co] • Met: Policies apply to the type of business relationships involved: Prodeco states on its Human Rights webpage that "We are governed by the human rights policy of our parent company, Glencore, which requires us to uphold the rights of our stakeholders, including our people and our local communities. These rights include, but are not limited to, freedom of association and collective bargaining, the right to equal treatment and work, and the prevention of child or forced labour". Glencore's policies apply to this business relationship. [Prodeco Human Rights Policy, N/A: grupoprodenco.com.co] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: In its Code of Conduct, the Company indicates, "We recognize and uphold the rights of our workforce to a safe workplace, freedom of association, collective representation, just compensation, job security and opportunities for development." However, the Company makes no reference measures to prohibit any form of intimidation or retaliation against trade unionists. [Code of Conduct, 2017: glencore.com]
E(3).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Denies allegations, but has engaged affected stakeholders: The company says "Prodeco reached successful agreements with its major labour unions in 2008, 2013 and 2016; these agreements and their period of duration show the success of the negotiations between Prodeco and its unions. Prodeco does not discriminate against union leaders or members and is not aware of any such cases"...."Prodeco applies disciplinary measures on a fair and objective basis for all its workers, unionized and non-unionized, and according to a process agreed with all parties, including its unions. Without details, we cannot provide responses to the general allegations made on changing shifts, dismissals and multiple suspensions as they are very general and we would need specific details before we could comment". This demonstrates it has engaged with workers and union members [Working Practices (responses to allegations), N/A: glencore.com] • Not met: Denies allegations, but reviewed systems to prevent such impacts: In relation to allegations regarding short term contract workers not receiving full benefits, the company responded by saying, "with respect to freedom of association, contractor workers have the same rights as Prodeco's employees. A number of years ago the Ministry of Labour investigated mining companies in Colombia for improper use of outsourcing; it found Prodeco to be legally compliant." However this review was not conducted recently and thus cannot be considered as sufficient. [Working Practices (responses to allegations), N/A: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: The company doesn't provide any publicly available evidence to demonstrate that a review has been conducted into the allegations raised by workers concerning disciplinary measures or marginalization of union members, nor that any recommendations have been implemented. The company says "Prodeco applies disciplinary measures on a fair and objective basis for all its workers, unionized and non-unionized, and according to a process agreed with all parties, including its unions. Without details, we cannot provide responses to the general allegations made on changing shifts, dismissals and multiple suspensions as they are very general and we would need specific details before we could comment". However this is not sufficient. [Working Practices (responses to allegations), N/A: glencore.com] • Not met: Denies allegations, and ensures systems prevent such impacts: The company says "Prodeco applies disciplinary measures on a fair and objective basis for all its workers, unionized and non-unionized, and according to a process agreed with all parties, including its unions. Without details, we cannot provide responses

Indicator Code	Indicator name	Score (out of 2)	Explanation
			to the general allegations made on changing shifts, dismissals and multiple suspensions as they are very general and we would need specific details before we could comment". However the company fails to demonstrate how it has ensured its systems will prevent such impacts occurring in the future, this is not sufficient. [Working Practices (responses to allegations), N/A: glencore.com]
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Cerrejon continues to face criticism over the numerous problems communities face at the Cerrejón Coal Mine in Colombia • Area: Access to water, Right to land, Right to livelihood, Right to security of persons • Story: Glencore is a joint-venture partner (with BHP Billiton and Anglo American) in the Cerrejon coal mine in Colombia. On August 21, 2017 Colombia's Constitutional Court suspended Cerrejon's permit to divert a stream because of inadequate consultation with local indigenous groups. The court postponed the start of mining activity towards the natural course of Bruno Creek for a period of three months while it considered an application for the protection of constitutional rights (tutela) relating to the communities of La Horqueta, Paradero and Gran Parada. In November the court found the project to divert the river would indeed threaten fundamental rights. The Constitutional Court also ordered that works continue on the maintenance, stabilization, and preservation of the new course in accordance with the respective environmental plan and the authorizations granted by the environmental authorities. It is also alleged that the transnational mining conglomerate Carbones del Cerrejón, who owns the El Cerrejón mine, consumes 24 million liters of water per day in a department like Guajira where 87 percent is desert. The population is experiencing a dramatic shortage of water, which in the last two years has reportedly caused the death of hundreds of children due to malnutrition and the diseases caused by water scarcity. In February 2019, indigenous and afro-descendent communities in the state of La Guajira launched a legal challenge against a recent modification of the environmental license for the Cerrejón coal mine. They argued that the alteration was carried out without an Environmental Impact Assessment, and requested the suspension of any further alteration of the license that would allow an expansion of mining activities. Jakeline Romero, a plaintiff from the community organisation, Fuerza de Mujeres Wayúu, said that the mine has impacted on the health of the Wayúu people, as well as impacting on the environment and access to water. The legal team claimed that the expansion of the mine would exacerbate the current humanitarian crisis in La Guajira caused by the mine, including a loss of food security and lack of access to water that has influenced the deaths of 5,000 children and malnutrition of 40,000. The Indigenous Wayuu people of Colombia have also alleged that when the Cerrejon coal mine opened the river they rely on to grow crops began to dry up and became contaminated. The Guardian also stated in an October 2018 article that: "In the neighbouring department of El Cesar, three Drummond mine union leaders were murdered in 2001. More recently in La Guajira, activists who resist Cerrejón's expansion plans have received renewed death threats. Despite the 2016 Colombian Peace Agreement, there has been a spike in assassinations of social leaders nationwide. At least 123 were murdered in the first six months of 2018". • Sources: [Business & Human Rights Centre - 21/08/2017 -: business-humanrights.org][Mines and Communities - 27/02/2016 : londonminingnetwork.org][The Guardian, 1/10/2018: theguardian.com -][Business & Human Rights Centre - 2/03/2019: business-humanrights.org]
E(4).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: Though Cerrejon itself has responded in detail, Glencore has not responded publicly to the allegations, nor has it pointed to Cerrejon's comments and therefore does not meet CHR indicator. [Cerrejon response, November 2018: cerrejon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: Though Cerrejon itself has responded in detail, Glencore has not responded publicly to the allegations, nor has it pointed to Cerrejon's comments and therefore does not meet CHR indicator. [Cerrejon response, November 2018: cerrejon.com]
E(4).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised: Regarding land rights Glencore states in its CoC that "We acknowledge that our operations have the potential to impact the communities where we operate. Where appropriate, we restore the livelihoods and standards of living of communities or individuals that have been displaced as a result of our activities". However this is not a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>commitment to respecting ownership of land, and thus credit cannot be given. In relation to the environment the company says, "We recognise the potential of our activities to impact water resources. We continuously monitor the quantity and quality of the water used in our processes and practice responsible waste water disposal. We engage with our host communities to ensure sustainable and equitable access to water". Further, in relation to security of persons, the company has a commitment to the UDHR. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Human Rights Policy, 2015: glencore.com]</p> <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: In its CoC, Glencore says "This Code applies to all of the marketing and industrial businesses that we control. It applies to all permanent and temporary employees, directors and officers as well as contractors (where they are under a relevant contractual obligation) to these businesses...when we enter into joint ventures where we are not the operator, we seek to influence our partners to adopt similar policies and procedures to those of Glencore wherever possible." [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: Glencore is a signatory to the CEO Water Mandate and has stated: 'Our aim is to responsibly manage our water impact without material adverse impact on the quality and quantity of any water body, and without compromising other users' access to water'. The company is also a participatory member of the Voluntary Principles on Security and Human Rights. However the company doesn't describe how it identifies legitimate rights of land tenure. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Sustainability report 2018, 04/2019: glencore.com]
E(4).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: In a letter published online, Lina Echeverri, Vice President of Public Affairs and Communication at Cerrejon, says that the company has engaged in consultations with the members of the Roche community to discuss issues of re-settlement, water shortages and compensation payments. Additionally the company also outlines the consultations undertaken with nearby communities in relation to the modification of the Bruno Creek riverbed. [Cerrejon letter Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org] • Not met: Encourages linked business to engage affected stakeholders: The CHRB was unable to find any publicly available evidence of Glencore encouraging its linked business (Cerrejon) to engage with the affected stakeholders. • Not met: Provides remedies to affected stakeholders: The letter from Cerrejon's Lina Echeverri, states that internal conflicts between the Roche Black Afro-descendent Community Council and its legal representatives resulted in "a situation preventing an agreement being reached" of which subsequently the Ministry of the Interior officially protocolised the consultation without an agreement. The letter states "We understand that, with this result, the expectation of many families who hoped to gain access to the compensations and indemnification have not been met". On the basis of this evidence no remedy has been provided to the affected community stakeholders. [Cerrejon letter Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org] • Not met: Has reviewed management systems to prevent recurrence: The CHRB has not identified any publicly available evidence that Cerrejon has reviewed its management systems in light of the engagement with the Roche community to prevent similar complications and impacts occurring in the future. [Cerrejon letter Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: Cerrejon has not provided any compensation to the 33 families identified as beneficiaries on the basis Council of State of criteria defined by the Council of State, thus remedy cannot be considered satisfactory. [Cerrejon letter Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org] • Not met: Has improved systems and engaged affected stakeholders: The CHRB has not identified any publicly available evidence that Cerrejon has improved its management systems in light of the engagement with the Roche community to prevent similar complications and impacts occurring in the future. [Cerrejon letter

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Headline: Collapse of terraces at Kamoto Copper's KOV Open-Pit Mine kills at least 43 artisanal miners in Congo • Area: Health & Safety • Story: On June 28, 2019, Reuters reported that 43 artisanal miners were killed in a landslide at one of Glencore PLC's (Glencore) open-pit mining facilities in the Democratic Republic of Congo. The incident resulted from the collapse of two galleries overlooking the main extraction area, where miners, operating illegally, were caught in the subsequent cave-ins. The accident occurred on a mine owned by KOV, part of the Kamoto Copper Company, which is controlled through a 75% stake by Glencore's subsidiary, Katanga Mining. Glencore responded to the incident and said it was assisting the search and rescue operations conducted by local authorities but 'There was no link between these incidents and KCC's operational activities'. The company also said its sites were being affected by an increase illegal mining activity, with an average of 2,000 illegal miners entering their sites every day. • Sources: [Reuters - 27/06/2019: uk.reuters.com][The Guardian - 27/06/2019: theguardian.com][Financial Times - 27/06/2019: ft.com][CNN - 27/06/2019: cnn.com]
E(5).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: In response to the incident, Glencore PLC (Glencore) issued a statement acknowledging the deaths of the artisanal miners at the Kamoto Copper Company (KCC) open-pit mining site. In the statement, Glencore also acknowledged the increasing presence of illegal artisanal miners throughout its industrial mining concessions in the Kolwezi area of the Democratic Republic of Congo. [Announcement regarding fatalities of illegal artisanal miners at KCC, 27/06/2019: glencore.com & FARDC in area around Kamoto Copper Company, 4/07/2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: In response to the incident at the Kamoto Copper Company's (KCC) mining site, Glencore PLC (Glencore) issued an official statement to the public available on its website. Glencore's statement mentioned the 19 fatalities and acknowledged that there may be further fatalities. Glencore also provided details on how the miners lost their lives: "The illegal artisanal miners were working two galleries in benches overlooking the extraction area. Two of these galleries caved in. These incidents were not linked to KCC operations or activities. KCC is currently engaged in assisting search and rescue operations with the local authorities." Also, Glencore highlighted the danger that illegal mining posed on its sites, stating that KCC was seeing 2,000 miners trespass onto its concessions every day, presenting a significant risk to its employees, operating equipment, and the illegal artisanal miners themselves. Lastly, Glencore also stated that KCC is committed to acting responsibly in a manner that respects human rights and in line with its commitments to the Voluntary Principles on Security and Human Rights. [Announcement regarding fatalities of illegal artisanal miners at KCC, 27/06/2019: glencore.com & FARDC in area around Kamoto Copper Company, 4/07/2019: glencore.com]
E(5).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: Glencore PLC (Glencore) states that it upholds the human rights of its people and local communities. It states that it works in line with UN Universal Declaration on Human Rights, the UN Guiding Principles on Business and Human Rights, UN Global Compact, International Labour Organization (ILO) Core Conventions, and the Voluntary Principles on Security and Human Rights. Glencore also says that it has a global Human Rights policy that applies across the Glencore Group. [Catastrophic hazard management, N/A: glencore.com & Safety] • Met: Policies apply to the type of business relationships involved: Glencore PLC's (Glencore) Human Rights Policy applies to all employees, contractors, and the communities that are affected by Glencore activities. Glencore seeks to ensure that key human rights impacts are embedded in internal risk assessment processes. [Human Rights Policy, 2015: glencore.com & Safety] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Glencore PLC (Glencore) states that it follows UN Sustainable Development Goals 3, that the company should ensure healthy lives and promote well-being for all at all ages. Glencore has also committed to Principle 4 of the International Council on Mining and Metals,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			that companies should implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks. Glencore also has a five-point risk scale to identify potential incidents and classify them on a five-point scale from 1 (negligible) to 5 (catastrophic). According to the company, this policy demands rigorous monitoring, evaluation, and reporting. [Catastrophic hazard management, N/A: glencore.com]
E(5).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: Glencore states that 'KCC is currently engaged in assisting search and rescue operations with the local authorities.' It also said that its subsidiary is doing what it can to inform the communities of the dangers associated with illegal trespassing on major industrial concessions. Glencore also set up a website [webauth.glencore.net] (now inactive) to provide updates regarding illegal mining at KCC sites. However, this is not considered engagement with affected stakeholders. [Catastrophic hazard management, N/A: glencore.com & FARDC in area around Kamoto Copper Company, 4/07/2019: glencore.com] • Not met: Encourages linked business to engage affected stakeholders: See above • Not met: Provides remedies to affected stakeholders: There is no evidence that the company provided remedies [Announcement regarding fatalities of illegal artisanal miners at KCC, 27/06/2019: glencore.com & FARDC in area around Kamoto Copper Company, 4/07/2019: glencore.com] • Met: Has reviewed management systems to prevent recurrence: Glencore PLC, through its subsidiary KCC, is working to identify and implement a long-term, sustainable solution to illegal mining in the DRC. Additionally, in the DRC, Glencore supports targeted programs to reduce illegal artisanal mining, through local co-operatives that work with local communities to generate sustainable income sources. [Announcement regarding fatalities of illegal artisanal miners at KCC, 27/06/2019: glencore.com & FARDC in area around Kamoto Copper Company, 4/07/2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> • Headline: Glencore accused of child labour in DRC • Area: Child labour, working hours, health & safety • Story: On December 15, 2019, a legal complaint has been filed in US by human rights group Rights Advocates on behalf of 14 families from the Democratic Republic of Congo (DRC) against Tesla, Microsoft, Alphabet, Dell, and Apple. The lawsuit accused the companies of aiding and abetting in the death and serious injury of children who they claim were working in cobalt mines owned by Glencore. It alleged that the defendants have known for a "significant period of time" that Congo's mining sector "is dependent upon children." The claim further alleged that cobalt from the Glencore-owned mines was then sold to Umicore, which in turn then sells battery-grade cobalt to Apple, Google, Tesla, Microsoft, and Dell. <p>The lawsuit alleged that the children, some as young as 6 years old, were forced by their families' extreme poverty to leave school and work in cobalt mines owned by Glencore. According to the complaint, 6 of the 14 children were killed in tunnel collapses, while others suffered life-altering injuries, including paralysis. Some children were allegedly paid USD 1.50 a day, working 6 days a week.</p> <p>According to the complaint, the main drivers of the cobalt supply chain are Glencore/Umicore and Zhejiang Huayou Cobalt Company. Knowing that the tech boom was going to cause a major surge in demand for cobalt, these companies allegedly stepped in to dominate the market and develop reliable sources for DRC cobalt.</p> <p>The complaint claimed that "Umicore and Glencore formally agreed to form a venture in which Glencore's DRC cobalt from, among other places, Glencore's mines operated by KCC, MUMI and Katanga Mining, where most of the plaintiffs were severely injured or killed, and Umicore would sell the cobalt to the defendants. All of these companies were formally locked in a "venture" that was created to mine cobalt using young children to perform hazardous labor. The venture was also allegedly established to preserve the existing supply chains of cobalt in the DRC to create plausible deniability for all involved. In the refining process, Umicore reportedly intentionally mixes the cobalt mined by children working under hazardous conditions with other cobalt and takes other steps to</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>impair the traceability of the DRC cobalt to give Defendants Apple, Alphabet, Dell, Microsoft and Tesla plausible deniability as to the source of the cobalt they purchase from Umicore."</p> <p>The lawsuit further alleged that "based on the Congolese Mining Code, only Congolese nationals can work as artisanal miners, so Glencore arranged to set up a sham cooperative, CMKK (Coopérative Minière Maadini kwa Kilimo), with Congolese nationals as leaders. CMKK then put a Lebanese man known as "Ismail" in charge of buying the output of the artisanal miners at Tilwezembe to sell to Glencore."</p> <p>• Sources: [CNN - 18/12/2019: cnn.com][Glencore press release - 17/12/2019: glencore.com][Sky News - 17/12/2019: news.sky.com][Reuters - 16/12/2019: es.reuters.com]</p>
E(6).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Met: Public response available: On December 17, 2019, Glencore issued a statement in response to the allegations levied against the company that it was using child labor. The company stated: "We [Glencore] do not tolerate any form of child, forced, or compulsory labour in our supply chain. We support and respect human rights in a manner consistent with the Universal Declaration of Human Rights." [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p> <p>Score 2</p> <p>• Met: Response goes into detail: Glencore's response to the allegations were comprehensive, fully detailing the nature of its operations in the DRC. The company explains that the lawsuit levied against the companies accused of child labor abuse references a number of concessions as locations of injury or fatalities, some of which, it explains, are erroneously claimed to be controlled and operated by KCC, Glencore's operation in the DRC. [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p>
E(6).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Met: Company policies address the general issues raised: Glencore PLC's Human Rights Policy states that "We [Glencore] do not tolerate any form of workplace discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We seek to reflect the diversity of the communities in which we operate in our workforce. We respect the rights of our employees and contractors, including the freedom of association and collective bargaining." [AG - Human Rights Policy (the same as for EX), 2015: glencoreagriculture.com]</p> <p>• Met: Policies apply to the type of business relationships involved: Glencore states that it expects business partners to share its commitment to respect human rights and conduct risk-based due diligence of suppliers during prequalification, the tendering process, or at the renewal of an existing term. [Human rights report 2018, 2019: glencore.com]</p> <p>Score 2</p> <p>• Not met: Policies address the specific rights in question: Although Glencore prohibits child labor, the company has not mentioned any specific practices that would help to enforce its prohibition, such as age verification processes. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]</p>
E(6).3	The Company has taken appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Met: Denies allegations, but has engaged affected stakeholders: The company has denied its involvement in the allegation by stating that it is not a defendant in the lawsuit filed in a US court by IRAdvocates on 15 December 2019 regarding child labour in the artisanal mining of cobalt in the Democratic Republic of Congo (DRC).. The company has said that it engages with local communities to highlight the risks associated with illegal artisanal mining, particularly in respect of an active industrial site. [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p> <p>• Met: Denies allegations, but reviewed systems to prevent such impacts: The company has denied its involvement in the allegation by stating that it is not a defendant in the lawsuit filed in a US court by IRAdvocates on 15 December 2019 regarding child labour in the artisanal mining of cobalt in the Democratic Republic of Congo (DRC). The company claims that it works with its security providers to ensure they continue to uphold respect for human rights in a manner consistent with the Voluntary Principles on Security and Human Rights. [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts: <p>Although the company denied its involvement in the allegation by stating that it is not a defendant in the lawsuit filed in a US court by IRAdvocates on 15 December 2019 regarding child labour in the artisanal mining of cobalt in the Democratic Republic of Congo (DRC), it has introduced some systems to mitigate the impact of the abuses by engaging with local communities to highlight the risks associated with illegal artisanal mining, particularly in respect of an active industrial site, the strengthening physical barriers to prevent intrusions and address the risk of injury from entering an industrial site, and working with our security providers to ensure they continue to uphold respect for human rights in a manner consistent with the Voluntary Principles on Security and Human Rights. However, it is not clear whether these initiatives will ensure that such abuses could continue to occur. [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p>

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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