

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Glencore
Industry Extractives
Overall Score (*) 39.1 out of 100

Theme Score	Out of	For Theme
7.0	10	A. Governance and Policies
9.3	25	B. Embedding Respect and Human Rights Due Diligence
3.3	15	C. Remedies and Grievance Mechanisms
8.8	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
5.8	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states in its Code of Conduct: 'We support and respect human rights in a manner consistent with the Universal Declaration of Human Rights. 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, 2017] • Not met: International Bill of Rights Score 2 • Not 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'. However, this is not considered as a commitment to abide by the principles contained in these. [Human Rights Policy] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>respect the rights of our employees and contractors, including the freedom of association and collective bargaining.' [Human Rights Policy & Code of Conduct, 2017]</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: See above • Met: All four ILO apply to EX BPs: 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, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: See above [Human Rights Policy & Code of Conduct, 2017] • 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, 2017] • Met: H&S applies to Ex BPs: See above [Code of Conduct, 2017]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: VPs participant: The Company is a participant of the Voluntary Principles on Security and Human Rights. [Code of Conduct, 2017] • Met: Respecting indigenous rights: In addition, it has a statement of support for indigenous peoples rights as it states: 'In our relationship with local communities we respect and promote human rights within our area of influence. This includes respect for the cultural heritage, customs and rights of those communities, including those of indigenous peoples'. [Code of Conduct, 2017] • Met: Expects BPs to respect these rights: 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) 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.' The code of conduct includes commitments to these rights. [Code of Conduct, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: In its document 'Our approach to sustainability', the Company indicates: '[...] we were also admitted to the International Council on Mining & Metals (ICMM) and endorsed its sustainable development framework principles'. 'Wherever mining projects are to be located on lands traditionally owned by, or under customary use of, indigenous people, the ICMM position statement on FPIC requires its members to respect indigenous people's rights, interests, special connections to lands and waters, and perspectives.' [Our approach to sustainability] • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: Regrading water, the Company is a signatory to the CEO Water Mandate and has indicated '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'. In addition, on its website section about Water Management, it indicates: 'Through good water management, we minimise our impact on water resources – for the benefit of local water users.' [Code of Conduct, 2017 & Water management: glencore.com] • Not met: Expects BPs to respect all these rights
A.1.4	Commitment to engage with stakeholders	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: 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, 2017]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to remedy: In its Sustainability Report 2017 the Company indicates: 'We offer fair and transparent access to remedy for any stakeholders affected by our operations. Our grievance mechanisms have recorded concerns relating to health and safety, labour conditions, the activities of our security forces and the rights of local communities.' [Sustainability Report, 2017] Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives: In its Sustainability Report, the Company indicates that Prodeco (which contains its activities in Colombia) 'has committed to the initiative Bettercoal and in 2018 will participate in its assurance programme'. However, there is no further information about how Bettercoal helps to provide access to remedy. [Sustainability Report, 2017] • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: CEO approves the Company's Code of Conduct. [Code of Conduct, 2017] • Met: Board level responsibility for HRs: In its Corporate Governance Report, the Company describes the responsibilities of the HSEC Committee: 'Mandated by the Board, the Audit and HSEC Committees are responsible for ensuring that the significant risks identified are properly managed. [...] HSEC risk management processes are operated at asset level subject to coordination and guidance from the central sustainability team and subject to the leadership and oversight of the HSEC Committee.[...] The main responsibilities of the Committee are to: ensure that appropriate Group policies are developed in line with our Values and Code of Conduct for the identification and management of current and emerging health, safety, environmental and community risks; evaluate the effectiveness of policy implementation and HSEC risk management' [Corporate Governance] Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: CEO made a presentation in 2017 Sustainable Development Roadshow in London. As part of its presentation Glencore's CEO spoke about 'Community and human right': 'We uphold respect for human rights through: Providing security training in focus countries and undertaking engagement with community; Operating appropriate complaints mechanisms at all of our operations o In 2016, the majority of complaints related to noise and dust; no significant human rights complaints; Mitigating the impacts of our operations on host communities o Our resettlement activities are aligned with international standards and aim to improve livelihoods'. [2017 Sustainable Development Roadshow, 2017]
A.2.2	Board discussions	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review of salient HRs: In its Sustainability Report, the Company indicates: 'Our Board HSEC committee has overall responsibility for the strategic direction of our sustainability activities and monitors the development and implementation of strategic HSEC programmes and policies. In addition, it reviews operational performance and internal and external reports as well as independent audits and reports of performance concerning HSEC matters; and action plans developed by management in response to identified material topics.' [Sustainability Report, 2017] Score 2 <ul style="list-style-type: none"> • Met: Examples or trends re HR discussion: In addition: 'During the year, our Board's HSEC committee discussed a broad range of sustainability matters: [...] continued its monitoring of achieving ongoing reduction in fatalities, especially at the higher risk 'focus assets'. [...] continued to analyse the implementation of the SafeWork programme focusing on the identification of total hazards and an

Indicator Code	Indicator name	Score (out of 2)	Explanation
			appropriate safety culture. [...] considered reports on key performance indicators in relation to material issues, including water and energy use and complaints from host communities, process safety management, water and effluents, waste and spills, human rights and grievance mechanisms, community engagement and product stewardship to social commitments; considered engagement with communities and NGO's on sustainability matters; [...] considered a variety of other HSEC issues such as resettlement programmes, incident reporting and health strategy.' [Sustainability Report, 2017] Score 2 • Met: Both examples and process
A.2.3	Incentives and performance management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Incentives for at least one board member: The Remuneration Committee 'considers corporate performance on HSEC and governance issues when setting remuneration for the Executive Director.' In addition, in 2015 Sustainability Report the Company indicated that the group has aligned its HSEC to include community and human rights. [Annual Report, 2017] • Met: At least one key EX RH risk, beyond employee H&S: See above Score 2 • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior responsibility fo HR (inc ILO) Score 2 • Not met: Day-to-day responsibility: In its Sustainability Report, the Company indicates: 'Our departmental and operational managers have day-to-day responsibility for ensuring that our people work in line with the [Group human rights] policy.' However, there is no further information about these responsibilities. [Sustainability Report, 2017] • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key EX HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR part of enterprise risk system: The Company has indicated that 'we seek to ensure that key human rights impacts are embedded in internal risk assessment processes'. In addition, in its Annual Report, 'Community relations and human rights' is one of the Company's principal risks and uncertainties: 'A perception that we are not respecting or advancing the interests of the communities in which we operate, could have a negative impact on our 'social licence to operate', our ability to secure access to new resources and our financial performance'. [Human Rights Policy & Annual Report, 2017] Score 2 • Not met: Audit Ctte or independent risk assessment: In addition, the Company indicates: ' The Board oversees sound risk management and internal control systems. It carries out a regular review of their effectiveness including reviewing the Group's internal financial controls and the Group's internal control and risk management.' However there is no specific information about how it assess the adequacy of the enterprise risk management system in managing human rights. [Annual Report, 2017]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Communicates its policy to all workers in own operations: The Company has a separate human rights policy which is available in English. The policy is also a part of the Code of conduct which was translated into English, Spanish, Russian, Portuguese, French, German and Chinese. In its Sustainability Report the Company indicates that 'Training and awareness on our policies, procedures and guidelines, as well as strong leadership and tone from the top, are critical components of our

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compliance programme'. The Company describes its actions to ensure policies training among its employees including Code of Conduct e-learning training, induction sessions, pre-shift general training and toolbox talks. [Sustainability Report, 2017]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Steps to communicate policy commitments to BRs: The Company has taken some steps to communicate its human rights commitment(s) to its business relationships as it indicated that 'contracts with some partners require them to work in alignment with our Code of Conduct, our Global Anti-Corruption Policy and our Human Rights Policy'. [Sustainability Report, 2015] • Met: Including to EX BPs: See above [Sustainability Report, 2015] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs
B.1.5	Training on 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: Trains all workers on HR policy commitments: In its document 'Our approach to sustainability, the Company indicates: 'Assets also conduct regular human rights training for their workforce. This covers general human rights awareness during day-to-day activities for our wider workforce, as well as focused Voluntary Principles training for our security employees and contractors.' [Our approach to sustainability] • Met: Trains relevant managers including security personnel: In its Sustainability Report, the Company indicates: 'Our compliance teams also conduct engaging face-to-face training for relevant employees to raise awareness about compliance risks related to their functions and to train them on Glencore's compliance policies and procedures. Our employees who do not have regular access to a work computer receive training on compliance topics through other platforms appropriate to their function and location. These approaches include induction sessions, pre-shift general training and toolbox talks.' Regarding the training of security personnel, the human rights policy stipulates 'the security procedures at our operations, assets and projects are aligned with the Voluntary Principles on Security and Human Rights. These procedures are reinforced by risk assessments and incident reporting mechanisms, as well as training for our security staff and contractors' [Sustainability Report, 2017 & Human Rights Policy] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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: Monitoring implementation of HR policy commitments: 'Our compliance monitoring function (CMF) seeks to ensure the effectiveness of Glencore's compliance programme through monitoring and testing the implementation and execution of our compliance policies, procedures, guidelines and relevant controls. The CMF works alongside our Group internal audit function (GIA), which evaluates and improves the effectiveness of our risk management, control and business governance processes. [...] In 2017, CMF visited multiple sites across six countries. The CMF also collaborated with the Group information technology and accounting team to integrate monitoring and testing into both our accounting and payment systems.' [Sustainability Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Monitoring EX BP's • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	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: HR affects selection extractives business partners • Met: HR affects on-going business partner relationships: The Company's code indicates: 'we may terminate (or decline to renew) the contract of any provider or contractor who breaches the law, the Code or Glencore's relevant policies'. And its 2015 Sustainability report reiterates that: 'we expect our contractors to comply with the same safety requirements as our direct employees, and to meet our safety training standards. We terminate contracts with partners who do not fulfil this expectation'. [Code of Conduct, 2017 & Sustainability Report, 2015]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with business partners to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The Company has explained it takes two main aspects into consideration: 'The first is our impact on our host communities and wider society; the second is any risk to our business from societal expectations and the political landscape. We require that our assets identify their stakeholders, taking particular care to determine vulnerable groups, such as women, children and indigenous people'. It goes on to explain that 'each asset must complete a stakeholder assessment, covering all stakeholder circumstances, needs and concerns, as well as potential impacts, risks and opportunities for that asset. From this assessment the asset must design an engagement strategy, which may include procedures for information sharing, consultation and collaboration. This strategy is aligned with the asset's business objectives and changes to its lifecycle, as well as local concerns and the broader socio-economic situation in the region. Senior management at each asset are aware of progress in implementing these strategies, which we also report on to the local communities involved. We require assets to review the strategies at each stage of their lifecycle to ensure that we continue to be aware of stakeholder priorities and needs. However, the Company does not describe whether or how it engages with workers amongst its extractive business partners on human rights issues. [Sustainability Report, 2015] • Met: Frequency and triggers for engagement: See above. In addition, the Company indicates: We provide our stakeholders with information in a wide range of different ways, tailored to the local context and cultural appropriate. These include radio broadcast, site publications, regular town hall meetings, and individual meetings with the community. We also have mechanisms to receive concerns, including free mobile SMS hotlines, complaints registers and dedicated offices within local communities. All concerns received through these mechanisms are regularly reported to senior operational and departmental management, and to the Board HSEC Committee on a quarterly basis'. [Sustainability Report, 2015 & Our approach to sustainability] • Met: communities in the SC engaged: See above [Sustainability Report, 2015] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 has indicated that '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. We report on issues with global interest or impact, or that affect more than one region. The regional sections at the end of this report focus on actions taken to address issues that are material to those locations. We consider a topic material if senior management determines that it may significantly affect our business operations or have a significant impact on any of our stakeholders. This assessment is then approved by the Board HSEC Committee'. [Sustainability Report, 2015] • Met: identifying risks in EX business partners: See above [Sustainability Report, 2015] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: It has added 'our operations conduct risk assessments at key phases of their lifecycles. The assessments may cover issues related to labour and workplace, use of security, our business partners, and interactions with stakeholders and vulnerable people. The risks are logged in the operational risk register; progress in addressing them is reported to senior management and the Board as appropriate'. [Sustainability Report, 2015] • Met: In consultation with stakeholders: See above [Sustainability Report, 2015] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • 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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): Amongst others, and through the above process (see B.2.1.), it has identified: health and safety, water use, respect for human rights, Engagement with communities and stakeholders, Work conditions, Engagement with labour unions, Taxes and royalty payments to host governments. However, it does not describe the process to assess risks nor whether or how it takes into account geographic, economic, social, or other factors. [Sustainability Report, 2015] • Met: Public disclosure of salient risks: See above. Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including amongst EX BRs Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness 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: The Company has communicated in its sustainability report its system to identify human rights risks and impacts including own operations and supply chain (see B.2.1). [Sustainability Report, 2017] • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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, 2017] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Sustainability Report indicates: 'During the year, we received 1.063 complaints from the communities living around our operations. These mainly related to odour, access to property and noise with communities in Chad'. 'In 2017, the Raising Concerns programme received 183 (2016: 153) reports on potential situations where Group policies may have been breached'. However, there is no information about how many human rights-related incidents were filed, addressed or resolved. [Sustainability Report, 2017]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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'. [Our approach to sustainability] • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BP workers: See above. However, it is not clear whether the channel is also available for BP workers. [Our approach to sustainability]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company has stated 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'. In its Sustainability Report 2017, it reported: 'During the year, we received 1,063 complaints from the communities living around our operations. These mainly related to odour, access to property and noise with communities in Chad, Australia and the Philippines reporting most of the complaints'. [Code of Conduct, 2017 & Sustainability Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company states 'Calls to these numbers are free of charge and are routed to a regional compliance contact who speaks the local language.' • Not met: Expects EX BP to have community grievance systems • Not met: EX BP 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.' However, it is not clear whether this mechanism is open also to its extractive business partners' stakeholders (communities) [Code of Conduct, 2017 & Our approach to sustainability]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company indicates that 'all queries raised via these 'Raising Concerns' channels are reviewed and assessed promptly' and that 'all complaints and grievances are registered and investigated'. However, no evidence found of further details. [Code of Conduct, 2017 & Sustainability Report, 2017] • Met: How complainants will be informed: In its 'Our approach to sustainability' document, the Company indicates: 'We investigate and assess all concerns reported through these mechanisms, and report back to the complainant on the results of the review.'; ' [...] we let complainants know results and any follow-up actions in culturally and locally appropriate manner. [Our approach to sustainability] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: 'Glencore has a zero tolerance approach for retaliation against any employee, contractor or third party who reports a concern in good faith'. [Sustainability Report, 2017] • Not met: Practical measures to prevent retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BRs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Member of EITI: The Company is a member of EITI and publishes a report on Payments made to Governments in which it reports payments made to governments in some countries in line with EU Directive reporting Requirements. [Payments to Governments Report, 2016] • Not met: Reports of taxes beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Code of Conduct, the Company indicates: 'We recognise 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 workers seeking to exercise their rights to FoA and CB. [Code of Conduct, 2017] • Met: Discloses % covered by collective bargaining: The Company has indicated that '73% of our employees are represented by an independent trade union or covered by a collective bargaining agreement'. [Sustainability Report, 2015] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company has reported fatalities, LTIFR and TRIFR per region of operation in its sustainability report. [Sustainability Report, 2017] • Met: Lost days or near miss disclosures: See above • Met: Fatalities disclosures: See above Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company sets targets for H&S in its Sustainability Report 2017: 'Zero fatalities, 50% reduction of Group LTIFR by the end of 2020 against 2015 baseline of 1.34, 50% reduction of Group TRIFR by the end of 2020 against 2014 baseline of 5.02, Year-on-year reduction in number of new cases of occupational disease'. [Sustainability Report, 2017]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Met targets or explains why not: In addition, the Company indicates: 'We remain on track to meet our 2020 target for both indicators (50% reduction against 2015 and 2014 baselines for LTIFR and TRIFR respectively). [...] Since SafeWork's introduction in 2013 we have achieved: A 65% reduction in fatalities compared to 2013 baseline of 26 fatalities; LTIFR has improved by 46% and TRIFR by 62% against our performance in 2013.' [Sustainability Report, 2017]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify indigenous rights holders: In its Sustainability Report 2015, the Company indicates: 'Some of our assets are located on or near the traditional lands of indigenous people. We have formal agreements at a number of these, including indigenous land use agreements (ILUAs) in Australia and impact benefit agreements (IBAs) in Canada. Wherever we work, we engage in open and continuous dialogue with indigenous communities to understand their culture, views and aspirations. This helps us work with them to minimise our impact and maximise the benefit we bring to them.' However, it is not clear how they identify the stakeholders who have traditional rights or interests in the land in question. [Sustainability Report, 2015] • Met: How engages with communities in assessment: In its Sustainability Report 2017, the Company describes some examples of how it engaged with communities in carrying out the assessment of potentially affected indigenous people in the last year: 'In early 2017, in northern Canada, our Raglan Mine and its Inuit community partners agreed on additional measures to the Raglan Agreement that will support the extension of the life of Raglan Mine for an additional 20 years. Based on the environmental and social impact assessment's results and conclusions for Raglan Mine's future, the Sivumut committee (meaning 'moving forward' in Inuktitut) reviewed the impacts of the project and its recommendations, which formed the basis of the additional measures to the Raglan Agreement. [...] In 2017, our coal business conducted work on four resettlements, two in Colombia and two in South Africa. These resettlements are conducted in accordance with national and international standards, including the IFC Performance Standard 5: Land acquisition and involuntary resettlement.' [Sustainability Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM): Although the Company states in its Sustainability Report 2017 that 'We also seek to apply the Voluntary Principles on Security and Human Rights, IFC's Standard 5 and ICMM's position statement on Free and Prior Informed Consent.', 'seek to apply' is not consider a clear commitment. [Sustainability Report, 2017] • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	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: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	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: How implements security (inc VPs or ICOC): The Company explains its approach to security and human rights in its 2017 Sustainability report: 'Our assets that are located in countries that we have identified as having a high potential risk of security-related human rights impacts have established procedures to support the implementation of the Voluntary Principles on Security and Human Rights. These include providing training sessions to both directly employed and contracted security officers. We are also working to raise awareness among public security forces present at our operations'. [Sustainability Report, 2017]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Example of respecting HRs in security: In addition, the Company reports examples: 'During the year, our security superintendent in Chad became aware of a human rights incident in a local community involving an individual from the public security forces assigned to our operation. Our security superintendent spoke to the local head of the public security forces and the individual involved was redeployed out of the region. In Colombia, eight critical contractors received training specifically on the rights of children and all of Prodeco's security employees attended a human rights workshop organised by the Universidad del Norte. Prodeco also completed an action plan to reduce and eliminate the gaps identified by a human rights risk assessment undertaken in 2016. This included further engagement with stakeholders. [...] In the Democratic Republic of Congo, our Katanga and Mutanda operations provided training for 1,530 contractors and 148 employees, a further 30 mine police participated in an information session. Mutanda also provides regular training to the regional police force.' [Sustainability Report, 2017] • Met: Ensures Business Partners follow security approach: See above [Sustainability Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Met: Working with local community: Furthermore, the Company describes its works implementing the Voluntary Principles in Chad: 'Chad E&P holds regular public forums, usually around four sessions per year, which involve all interested stakeholders including NGOs, village chiefs and canton heads, administrative authorities and military representatives. During the forums, discussions cover a range of operational matters, including security.' [Sustainability Report, 2017]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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 to prevent water and sanitation risks: On its website section 'Water Management', the Company indicates: 'Through investment in water-related programmes such as wells or filtration plants, we help communities gain access to high-quality water.' In addition, in its Sustainability Report 2017, the Company indicates: 'Some of our assets are located in areas with high to extremely high water baseline stress and must share access to water with other local water users. Other assets must manage surplus water that may involve dewatering activities and flood protection measures. [...] We aim to prioritise efficient water use, reuse and recycling, responsible waste water disposal and maintaining any equipment that may pose a hazard to water quality to avoid, and where avoidance is not possible, to minimise any potential water-related impacts. We work to provide fair and equitable access for all users' [...] 'In 2017, we withdrew 924 million m3 of water (2016: 971 million m3 or 829 million m3 excluding Glencore Agriculture). The like-for-like increase is mainly due to two assets increasing their dewatering efforts as their operational profiles reached groundwater aquifers and all assets aligning with our revised water reporting requirements.' [Water management: glencore.com & Sustainability Report, 2015] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors: In its 'Our approach to sustainability' document, the Company indicates: 'Each asset with water-related risks develops a water management plan that reflects its lifecycle, the steps needed to eliminate or mitigate water impacts and risks, and the opportunities to improve water performance. This includes setting water-related targets, which may include water efficiency, reducing the fresh water withdrawal, and increasing the quality of discharged water.' However, it is not clear whether this targets take into consideration water use by local communities and other users in the vicinity of its operations. [Our approach to sustainability] • Not met: Reports progress in meeting targets and shows trends in progress made

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Health and safety • Headline: Seven workers die after landslide hits mine operated by a Glencore subsidiary in the DR Congo • Sources: Glencore reports seven dead in mining accident - The Guardian - 17/03/2016 Two Dead, Five Missing at Glencore's Katanga Mine - The Wall Street Journal - 08/03/2016 • Allegation: Seven workers were killed in a landslide when a wall collapsed at a copper mine operated by Glencore subsidiary Katanga Mining in the Democratic Republic of Congo in 2016. The company stated that the landslide was caused by a 'geo-technical failure' that led to the collapse of the north wall at the open pit 'KOV' mine. The workers were doing maintenance work at the site, which had been temporarily shut down by Glencore in September 2015 because of poor copper prices. Katanga is 75% owned by Glencore.
E(1).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: As far as CHRBB was able to ascertain, the Company has not responded publicly to the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).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: In its Code of Conduct the Company commits to 'protecting the health and well-being of all our people'. • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders <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(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Right to security • Headline: Peruvian community takes Glencore to justice for killing and injuring of protesters • Sources: The Guardian, 31/10/2017 - theguardian.com Telesur 01/11/2017 - telesurtv.net Business and Human Rights Resource Centre - David and Goliath in UK High Court : Cuzco communities versus Xstrata - Peru Support Group - 06/03/2016 Hearing in London High Court in claim by Peruvians against mining firm - Leigh Day - 24/02/2016 - leighday.co.uk Glencore confident of defeating claims relating to fatal protests at Xstrata's Tintaya copper mine - Metal Bulletin Daily - 20/04/2016 • Allegation: 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
E(2).1	The Company has responded publicly to the allegation	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: Public response available: An article in The Guardian 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. Xstrata also said that the Peruvian national police operated independently and it had no control over their behaviour'. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).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 • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company is a participant of the Voluntary Principles on Security and Human Rights. In addition, it has stated its support for the rights of indigenous peoples, saying: 'in our relationship with local communities we respect and promote human rights within our area of influence. This includes respect for the cultural heritage, customs and rights of those communities, including those of indigenous peoples'.
E(2).3	The Company has taken appropriate action	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: 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"> • Area: Right to security • Headline: Glencore accused of funding military operations linked to human rights violations at the Tampakan Copper-Gold Project South Cotabato, Philippines • Sources: Company press release, 24/06/2015 - glencore.com Aussie-PH fact finding mission validates adverse impacts to communities affected by AU mining companies - Mines and communities, 21/02/2015 - minesandcommunities.org Glencore plc: Violent Conflict with Indigenous Groups in the Philippines - Facing Finance - facing-finance.org Kalikasan 04/02/2015 - kalikasan.net - "Mindanao local seeks Brits' help to fight mining giant" - Mines and Communities - 13/11/2014 Glencore Xstrata Tampakan Copper-Gold Project South Cotabato, Philippines - Environmental Justice Atlas - ejatlas.org Commodities giant Glencore jeopardises human rights situation in the Philippines, 19/06/2013 - Information Platform humanrights.ch - humanrights.ch • Allegation: The Tampakan Copper-Gold Project in the Southern Philippines is owned by Glencore Xstrata with Australian company Indophil and local subsidiary Sagittarius Mines Inc (SMI). Bla'an people and other tribes oppose the project arguing it will directly impact five watersheds, around 3,000-hectares of old-growth forest and five ancestral domains, while an estimate of 4,000 people, mostly indigenous peoples, will need to be re-settled. Opponents also argue the operations will damage food and water sources and will eventually lead to social unrest. There is also risk of pollution, erosion, siltation, flash floods, landslides and seismic geohazards. Because of the strong opposition to the project, military and paramilitary groups have been deployed in the area, which have allegedly been involved in human rights abuses and the killing of anti-mining IP leaders. <p>As of the end of 2014, a total of 10 indigenous peoples had been murdered, according to NGOs and media reports. Glencore is accused of funding the local military operations. In November 2014, local activists called for an investigation over the Tampakan project, with particular emphasis on its human and environmental costs. They also resorted to the legal system through the Military and Regular Court. In February 2015, environmental advocates and grassroots groups shared the initial findings of a fact-finding mission that highlighted continuing violations of human rights and infringement of environmental regulations. The group went to Tampakan to check on the human rights situation in communities within Glencore-SMI. A spokesperson for Defend Patrimony and the national coordinator of the Rural Missionaries of the Philippines said: "The massacre of the indigenous Bla'an family of the Capions still unresolved as new incidences such as the illegal detention and torture of anti-mining activist Romeo Rivera continue to occur." According to NGOs, communities in Tampakan continue to suffer from militarization and displacement: "The Bla'ans are still being coerced to give their consent to the mining project of Glencore-SMI. Government agencies and Glencore-SMI officials persist in their deception tactics and the violation of the indigenous people's right to Free, Prior and Informed Consent (FPIC)."</p> <p>In February 2014, Glencore Xstrata announced its willingness to sell its stake in the Tampakan project. In August 2014, Glencore was brought before the UN Human Rights Council over claims surrounding its Tampakan Gold and copper mine. The</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			claims related to the killing of activists, arbitrary arrests, displacement, denial of local indigenous peoples right to 'free, prior and informed consent' and environmental damage. An independent Human Rights Impact Assessment (HRIA) of the Tampakan copper-gold project (conducted by the Institute for Development and Peace (INEF), commissioned by MISEREOR (German Catholic Bishops Organization for Development Cooperation) and Fastenopfer (Swiss Catholic Lenten Fund), in collaboration with Bread for All) concluded that 'the Tampakan Project has significant impacts on the human rights situation in the area' such as violation of indigenous rights and environmental impacts'. In June 2015, Glencore sold its entire remaining interest in the Tampakan Project in the Philippines ("Tampakan"). However, as per CHRB methodology, in cases of legal action and criticisms of remedial action, an allegation remains valid even if it occurred in 2013.
E(3).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Public response available: As far as CHRB was able to ascertain, the Company has not responded publicly to the allegation. Score 2 • Not met: Response goes into detail
E(3).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved Score 2 • Met: Policies address the specific rights in question: The Company is a participant of the Voluntary Principles on Security and Human Rights. In addition, it has stated its support for the rights of indigenous peoples, saying: 'in our relationship with local communities we respect and promote human rights within our area of influence. This includes respect for the cultural heritage, customs and rights of those communities, including those of indigenous peoples'.
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: In June 2015, Glencore sold its entire remaining interest in the Tampakan Project in the Philippines. • Not met: Has reviewed management systems to prevent recurrence Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(4).0	Serious allegation No 4		• Area: Right to land, Access to water • Headline: Cerrejon continues to face criticism over the numerous problems communities face at the Cerrejón Coal Mine in Colombia • Sources: Colombia: Constitutional Court suspends Cerrejon's permit to divert stream over lack of consultations with local indigenous groups; incl. company statement - Business & Human Rights Centre - 21/08/2017 - business-humanrights.org Le Monde, 15/12/2015 - lemonde.fr business-humanrights.org • Allegation: 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.
E(4).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Public response available: Although the operating company for Cerrejón stated it respects the court's decision and will not work in the mining area towards the natural course until a definitive ruling is issued, CHRB could not find any public statement from Glencore regarding its position.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved Score 2 • 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'.
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.95 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Glencore made data public that met one or more elements of the methodology in 28 cases, leading to a disclosure score of 2.95 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 • Met: Company reports on GRI: The Company discloses a document with GRI references for its 2017 Reports and documents. [Global Reporting Initiative databook, 2017]
F.3	Key, High Quality Disclosures	0.8 out of 4	Glencore met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.