

Company Name Glencore
Industry Agricultural Products (Supply Chain only) & Extractives
Overall Score (*) 46.1 out of 100

Theme Score	Out of	For Theme
6.7	10	A. Governance and Policies
13.1	25	B. Embedding Respect and Human Rights Due Diligence
5.0	15	C. Remedies and Grievance Mechanisms
6.2	20	D. Performance: Company Human Rights Practices
9.7	20	E. Performance: Responses to Serious Allegations
5.5	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 that the 2019 CHRB assessment covers both Glencore and Glencore Agriculture, whereas the 2017 and 2018 assessments focused on Glencore (Extractives).

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 2019 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 <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 Score 2 <ul style="list-style-type: none"> 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: glencore.com] 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 <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

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			<p>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: glencore.com & Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]</p> <ul style="list-style-type: none"> • 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 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: glencore.com & Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • 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.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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"> • Not met: Respect land ownership and natural resources: In its Code of Conduct, the Company states: 'Our engagement activities at our extractive operations are aligned with the principles of Free, Prior and Informed Consent for Indigenous Peoples, as endorsed by the International Council on Mining and Metals (ICMM).' However, to be 'aligned with' is not consider a clear commitment and it is not clear whether this statement applies also for Agricultural activities. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Human Rights Policy: glencore.com] • Met: Respecting the right to water: In the Sustainability report, it sates that 'we recognise access to safe and clean water as a human right. We seek to understand our effect on the environment, minimise our water-related impacts and ensure

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>that our activities do not compromise any shared use of water'. [Sustainability report 2018, 04/2019: glencore.com]</p> <ul style="list-style-type: none"> • Met: Expecting suppliers 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 and officers as well as contractors (when they are under a relevant contractual obligation) of the business.' In addition, the Company encourages its suppliers to adopt similar policies and procedures: 'In our dealings with our [...] suppliers [...], we encourage them to respect and comply with our approach to human rights, or one of an equivalent standard. [...] We seek to ensure that our suppliers, including contractors, maintain: [...] 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] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards: In its Code of Conduct, the Company states: 'We seek to avoid the resettlement of communities. Where it is unavoidable, we consult closely with the affected population and seek to obtain its broad-based support. Our approach towards resettlement is aligned with the International Finance Corporation (IFC) Performance Standard 5: Land Acquisition and Involuntary Resettlement.' However, 'aligned with' is not consider a clear commitment following CHRB wording criteria. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Not met: FPIC for all: In its Code of Conduct, the Company states: 'Our engagement activities at our extractive operations are aligned with the principles of Free, Prior and Informed Consent for Indigenous Peoples, as endorsed by the International Council on Mining and Metals (ICMM).' However, to be 'aligned with' is not consider a clear commitment and it is not clear whether this statement applies also for Agricultural activities. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: Regarding 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 'Environment', the Company states: 'Where possible we are minimising the impact of water use in our operations, looking at our fresh water use and how we get rid of waste water. We pay special attention to sites in areas where water is already under pressure. We support the United Nations Sustainable Development Goal 6: Clean water and sanitation.' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Ag - Environment, Mar 2019: glencoreagriculture.com] • Not met: Expecting suppliers to respect these rights [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's rights (AG)	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: Women's rights: In its 'Our Approach to Sustainability 2018' the Company indicates: Glencore prioritises respect for human rights everywhere that we operate. We uphold the human rights of our people and our local communities, including vulnerable groups such as women, children, indigenous people and victims of conflict' [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Children's rights: See above [Our Approach to Sustainability - 2018, 2018: glencore.com] <ul style="list-style-type: none"> • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.3.EX	Commitment to respect human rights particularly	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: Voluntary Principles (VPs) participant: The Company is a participant of the Voluntary Principles on Security and Human Rights. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]

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	relevant to the industry (EX)		<ul style="list-style-type: none"> • 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 (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • 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 (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: In its document 'Our approach to sustainability', the Company indicates that in 2014 it joined the 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.' In the approach to sustainability 2018, it indicates that in 2014 joined the ICMM and endorsed its sustainable development framework principles. In addition, in its Code of Conduct, the Company states: 'Our engagement activities at our extractive operations are aligned with the principles of Free, Prior and Informed Consent for Indigenous Peoples, as endorsed by the International Council on Mining and Metals (ICMM).' [Our Approach to Sustainability - 2018, 2018: glencore.com & Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards: In its Code of Conduct, the Company states: 'We seek to avoid the resettlement of communities. Where it is unavoidable, we consult closely with the affected population and seek to obtain its broad-based support. Our approach towards resettlement is aligned with the International Finance Corporation (IFC) Performance Standard 5: Land Acquisition and Involuntary Resettlement.' However, to be 'aligned with' is not consider a clear commitment. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • 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 (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Water management: glencore.com] • Met: Expects BPs to commit to all 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 suppliers 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. [...] We seek to ensure that our suppliers, including contractors, maintain: [...] 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]

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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 (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 • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	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: Commits to remedy: In its Sustainability Report 2017 the Company indicates: 'We recognise that mining can have an impact, both positive and negative, on the rights of workers and communities. We are also aware of the need to ensure unencumbered, fair and transparent access to remedy for any stakeholder affected by our operations. We are continuing to look for ways to strengthen the mechanisms we have in place to address this'. In addition, in its Modern Slavery Statement 2017, the Company states: 'We consider access to remedy to be a core aspect of our management of human rights'. However, it is not clear if the company has a commitment to remedy adverse HR impacts. [Sustainability report 2018, 04/2019: glencore.com & AG - Modern Slavery Statement 2017, 2017: glencoreagriculture.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Human rights report indicates that '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: 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, 12/07/2019: 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, 12/07/2019: glencore.com]
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments • 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	<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: CEO or Board approves policy: CEO approves the Company's Code of Conduct. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> 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] <p>Score 2</p> <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	<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: Board/Committee review of salient HRs: The Company indicates that the Board HSEC Committee has oversight and ultimate responsibility for the Group Sustainability strategy. Strategy includes 'community and human rights area', which consists in fostering sustainable growth and Orespect human rights wherever we operate'. The Human rights report also indicates that 'the Board HSEC Committee sets the leadership direction for our human rights programme and monitors the effectiveness of the Group policies and processes'. [Our Approach to Sustainability - 2018, 2018: glencore.com] Met: Examples or trends re HR discussion: The sustainability report includes a letter from the 'HSEC Committee chair' where he describes the activity of the Committee during the year. This includes, among other issues, 'oversight of the SafeWork programme implementation and its focus on the identification of fatal hazards and the establishment of a robust safety culture at all of our operations'. In addition it makes references to the deaths that took place over the year. [Sustainability report 2018, 04/2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both examples and process
A.2.3	Incentives and performance management	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: 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 Sustainability Report the Company indicates that the group has aligned its HSEC to include community and human rights. [Annual Report, 2017] Met: At least one key AG HR risk, beyond employee H&S: See above [Annual Report, 2017] Met: At least one key EX RH risk, beyond employee H&S: See above [Annual Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> 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	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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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’. [Our Approach to Sustainability - 2018, 2018: glencore.com] Score 2 • 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: As indicated above, the Company 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, 2019: glencore.com] • Not met: Day-to-day responsibility for EX BRs: As indicated above, the Company 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. In addition, not clear whether procurement is also responsible for extractive business partners. [Human rights report, 2019: glencore.com]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S • Not met: At least one key EX HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as 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: glencore.com & Annual Report, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Company states that in 2018 'the steering committee conducted a review to examine how well our assets are implementing our Group Human Rights Policy. This was to improve our understanding of how our business has integrated human rights concerns into day-to-day operating practice across the Group'. The review identified four priority areas for improvement, including 'business partners', 'training and capability development', 'grievance mechanisms', and 'community and human rights incident tracking and reporting'. 'The steering committee presented these findings to the Board HSEC committee and senior management who approved a programme work to address the gaps'. However, it is not clear if the assessment is carried out by a third party and/or overseen by the Audit Committee. [Human rights report, 2019: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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 ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: The Company has a separate human rights policy which is available in English, Chinese, French, German, Russian, Portuguese and Spanish. The policy is also a part of the Code of conduct which was translated into the same languages. The Company also indicates that 'assets are required to conduct regular human rights training for their workforces, with a focus on those employees in positions exposed to human rights concerns, such as security This covers general human rights awareness during day-to-day activities for our wider workforce'. [Our Approach to Sustainability - 2018, 2018: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: The Company describes its relations with communities, including consultation processes and community engagement strategies. 'Community engagement strategies should include community engagement and development activities, including work to inform, consult or respond to partner with stakeholders, mechanisms for monitoring the effectiveness of engagement on an ongoing basis'. It also states that 'consultation processes are designed to be inclusive, particularly for historically disadvantaged groups'. However, it is not clear whether these processes include communication of policy commitments. [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: How policy commitments are made accessible to audience: As indicated above, the Company has community engagement strategies. However it is not clear if policy communication is included among them, and, in that case, how it is communicated in a way accessible to its intended audience. [Our Approach to Sustainability - 2018, 2018: glencore.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy down the whole AG supply chain: The Company indicates in the 2015 report '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'. However, this evidence is currently outdated. In its '2018 Our approach to sustainability' document, the Company indicates: 'Working with our business partners: We detail the standards we expect of all our suppliers in our Code of Conduct, Global Anti-corruption Policy and Group Human Rights Policy.' However, no evidence found in last reporting years of how the company actively communicates its policies.' [Sustainability Report, 2015 & Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: Requiring AG suppliers to communicate policy down the chain: As indicated above, it is not clear how the Company actively communicates its policies to the supply chain. Below is referenced that the Company intends to include supplier standards in contracts, although it is not clear if this practice has been implemented. The supplier standards document indicates that 'we encourage our suppliers to share and apply the expectations detailed in these supplier standards with their own supply chain and exercise due diligence on the materials, products and services supplied to Glencore companies'. However, it is not clear if suppliers are actually required or expected to communicate policies down the supply chain, as the texts refers only to encouragement. • Not met: Communicating policy to EX contractors and joint ventures: The Company indicates in the 2015 report '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'. However, this evidence is currently outdated. In its '2018 Our approach to sustainability' document, the Company indicates: 'Working with our business partners: We detail the standards we expect of all our suppliers in our Code of Conduct, Global Anti-corruption Policy and Group Human Rights Policy.' However, no evidence found in last reporting years of how the company actively communicates its policies.' [Sustainability Report, 2015 & Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: Including to EX BPs (removed): As indicated, above, it is not clear how the Company actively communicates policy commitments to extractive business partners. Below is referenced that the Company intends to include supplier standards in contracts, although it is not clear if this practice has been implemented [Supplier standards, 2019: glencore.com & Our Approach to Sustainability - 2018, 2018: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: As indicated above, the document considers suppliers 'any individual, organisation or company that provides, sells or leases materials, products or services directly to Glencore companies, including contract workers'. The document states that 'Glencore expects these supplier standards will be incorporated, by reference, into all supplier contracts'. However, considering that this refers to a future plan and the document has been recently released, it is not clear whether this practice is being already implemented. [Supplier standards, 2019: glencore.com] • Not met: Including on AG suppliers: See above, not clear if this practice has already been implemented. [Supplier standards, 2019: glencore.com] • Not met: Including on EX BPs: See above, not clear if this practice has already been implemented. [Supplier standards, 2019: glencore.com]
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: Although the Databook reports different rates of human rights training for different years (87% in 2016, 46% in 2017 and 79%, these last two excluding Glencore Agriculture), it can be assumed that eventually all are covered by training, based on the following comment from the latest 'approach to sustainability' document: 'Assets are required to conduct regular human rights training for their workforces, with a focus on those employees in positions exposed to human rights concerns, such as security 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 - 2018, 2018: glencore.com & Databook and GRI references 2018, 2019: glencore.com] • Not met: Trains relevant AG managers including procurement: The Company indicates that it tailors training programmes to make them relevant for employees and contractors. 'Compliance officers and compliance coordinators conduct 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, procedures and guidelines'. However, no specific evidence found in relation to training of relevant managers, including at least procurement, related to agricultural activities. [Sustainability report 2018, 04/2019: glencore.com] • Met: Trains relevant EX managers including security personnel: 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'. The Sustainability report indicates that 'at our assets located in countries that we identified as having a high potential risk of security-related human rights impacts, we established procedures to support the implementation of the UN's Voluntary Principles [...] At these assets, employees and contractors in security functions receive annual training on the VPs'. In addition, see above in relation to general human rights training including VPs evidence from the 'our approach to sustainability' document. [Sustainability report 2018, 04/2019: glencore.com & Human Rights Policy: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met: Although the Company carries out training and discloses evidence for relevant training in extractive operations, no specific evidence found in relation to agricultural activities.
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2: See indicator A.1.2 • 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.' No more recent evidence found. [Sustainability Report, 2017: glencore.com & Sustainability report 2018, 04/2019: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Monitoring AG suppliers: The Company indicates that 'we undertake appropriate due diligence of our current and potential suppliers, using a risk-based approach [...] on the basis of the risk assessment, suppliers may be required to complete a self-assessment against these supplier standards. In some instances we may conduct further due diligence, including the use of third party verification'. The Company also indicates that 'our supplier audits range from desktop credit checks to physical onsite inspections, preannounced or informal visits. Such audits are typically completed by third-party service providers. Our procurement supply chain sustainability assessments are not limited to our key suppliers but defined at asset level in accordance with our risk management framework'. [Supplier standards, 2019: glencore.com & Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Monitoring EX BP's: As above. The supplier standards define suppliers as 'any individual, organisation or company that provides, sells or leases materials, products or services directly to Glencore companies, including contract workers'. [Supplier standards, 2019: glencore.com & Our Approach to Sustainability - 2018, 2018: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company indicates that 'if an unacceptable level of risk is identified, we will work with the supplier to determine appropriate corrective action. The corrective action will be monitored by Glencore and the affected supplier until both parties agree the desired outcome has been achieved. At all times we reserve the right to suspend, discontinue or terminate relationships with suppliers when we have reason to suspect or can identify that the supplier [...] refuses or fails to demonstrate reasonable and timely efforts to implement agreed corrective actions required to operate in accordance with our supplier standards'. The company's definition of supplier includes 'any individual, organisation or company that provides, sells or leases materials, products or services directly to Glencore companies, including contract workers'. However, no evidence found in relation to the number of incidences found. [Supplier standards, 2019: glencore.com] • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored: Evidence found, described below, excludes 'Glencore Agriculture'. [Databook and GRI references 2018, 2019: glencore.com] • Not met: Discloses % of EX supply chain monitored: The Company indicates that 50% of new suppliers screened using social criteria in 2018. The company's documents in relation to suppliers use a wide definition of suppliers (including anyone rendering services including contract workers). However, it is not clear the total percentage of suppliers, including extractive business partners screened, since evidence seems to refer exclusively to new ones. [Databook and GRI references 2018, 2019: glencore.com]
B.1.7	Engaging business relationships	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: HR affects AG selection of suppliers: The supplier standards document states that 'we undertake appropriate due diligence of our current and potential suppliers, using a risk-based approach. During pre-qualification, the tendering process, or at the renewal of an existing contract term we conduct risk assessments of our suppliers. On the basis of the risk assessment, suppliers may be required to complete a self-assessment against these supplier standards...' [Supplier standards, 2019: glencore.com] • Met: HR affects on-going AG supplier relationships: In its Code of Conduct, the Company states: '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' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Met: HR affects selection EXs business partners: The supplier standards document states that 'we undertake appropriate due diligence of our current and potential suppliers, using a risk-based approach. During pre-qualification, the tendering process, or at the renewal of an existing contract term we conduct risk assessments of our suppliers. On the basis of the risk assessment, suppliers may be required to complete a self-assessment against these supplier standards...'. For the purposes of this document, 'a supplier is any individual, organisation or company that provides, sells or leases materials, products or services directly to Glencore companies, including contract workers'. [Supplier standards, 2019: glencore.com] • Met: HR affects on-going EX business partner relationships: The Company's code indicates: 'we may terminate (or decline to renew) the contract of any provider or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>contractor who breaches the law, the Code or Glencore's relevant policies'. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance: The supplier standards include provisions of work to carry out in case of risk identified or corrective action needed. However, no evidence found of active work carried out with suppliers (agricultural business) to improve performance (not necessarily as a response or need of specific corrective action process), including examples. [Supplier standards, 2019: glencore.com] • Not met: Working with EX business partners to improve performance: The supplier standards include provisions of work to carry out in case of risk identified or corrective action needed. However, no evidence found of active work carried out with extractive business partners to improve performance (not necessarily as a response or need of specific corrective action process), including examples. [Supplier standards, 2019: glencore.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: In its '2018 Our approach to sustainability' document, the Company indicates: 'We require that our assets identify their stakeholders, taking particular care to determine vulnerable groups, such as women, children and indigenous people. 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 designs an engagement strategy, which may include procedures for information sharing, consultation and collaboration.[...] Our stakeholders include our employees and contractors, host communities, civil society, unions, governments, business partners, investors and the media. We conduct dialogues on local, national, regional and international levels. We hold regular face-to-face meetings, conference calls and participate in multi-stakeholder discussions.' However, it is not clear how the Company engaged with affected stakeholders in the last two years. [Our Approach to Sustainability - 2018, 2018: glencore.com] • 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'. The Human rights report, in relation to community engagement indicates that 'we require each asset to have a stakeholder engagement strategy, designed to help the asset understand community challenges and objectives, and design development activities in collaboration with local people. The frequency of dialogue depends on the local environment and can range from monthly, to quarterly to annually plus ad hoc engagement as required'. Finally, the Company also indicates that 'all our assets are required to carry out community perception surveys every three years, to check on the effectiveness of their engagement strategies'. [Our Approach to Sustainability - 2018, 2018: glencore.com & Human rights report, 2019: glencore.com] • Met: Communities in the AG SC engaged: See above [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Engagement includes EX business partners communities: See above [Our Approach to Sustainability - 2018, 2018: glencore.com] <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: In its '2018 Our approach to sustainability' document, 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, 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 decentralised business model supports the corporate and asset teams managing, mitigating and eliminating risks as appropriate.' [Our Approach to Sustainability - 2018, 2018: 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 • 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)
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 Human rights report indicates that 'our preliminary assessment identified six salient risks across the Group: labour rights, safety, health, security, inequality and water. There are not the only risks that we manage. These risks, are, however, those where the activities of our assets and business partners may result in the most severe negative impact on human rights'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The Company also discloses a chart the different business processes in which these risks can take place. [Human rights report, 2019: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met [Our Approach to Sustainability - 2018, 2018: glencore.com & Human rights report, 2019: glencore.com]
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 • 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, 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 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. 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 human rights risks reported in previous indicators measured whether there have been improvements.. [Human rights report, 2019: glencore.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <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	<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: Comms plan re identifying risks: See B.2.1 [Our Approach to Sustainability - 2018, 2018: glencore.com] • Met: Comms plan re assessing risks: As indicated in B.2.2, the Company describes how it assesses its risks and discloses which are its salient risks, including a detail of which risks are relevant depending on the business process. [Human rights report, 2019: glencore.com] • Not met: Comms plan re action plans for risks: See B.2.3. The Company describes how it deals with the different salient issues identified, including through examples. No evidence of how it communicates action plans carried out involving supply chain (agriculture) and extractive business partners. [Human rights report, 2019: glencore.com] • Not met: Comms plan re reviewing action plans: See B.2.4. The Company reports about a process to identify gaps and strengths in policy implementation, and a process to improve in the case of gaps. No evidence found, however, of a system to track whether actions carried out to mitigate salient risks have been effective in mitigating/managing those risks [Human rights report, 2019: glencore.com] • Not met: Including AG suppliers • Not met: Including EX business partners <p>Score 2</p> <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. [Human rights report, 2019: glencore.com]</p> <ul style="list-style-type: none"> • 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, 2019: glencore.com]

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	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <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] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Sustainability Report indicates: 'During the year, we received 1,057 complaints from the communities living around our operations (2017, 1,063 complaints). The majority of the complaints received related to Chad E&P, Mount Isa and Mangoola, primarily regarding access to property (Chad), air emissions (Mount Isa) and noise (Mangoola). However, there is no information about how many human rights-related incidents were filed, addressed or resolved. [Sustainability report 2018, 04/2019: 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 • 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, 15/07/2019: glencore.raisingconcerns.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 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 reports: During 2018, we received 1,057 complaints from the communities living around our operations (2017: 1,063 complaints). The majority of the complaints received related to Chad E&P, Mount Isa and Mangoola, primarily regarding access to property (Chad), air emissions (Mount Isa) and noise (Mangoola). [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Sustainability report 2018, 04/2019: glencore.com] <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.' The raising concerns platform, available to all, is available in more than 20 languages, and seem to automatically use the language of the country from which the user is connecting. [Raising concerns, 15/07/2019: 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 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, 15/07/2019: glencore.raisingconcerns.org]
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: AG suppliers consult users in creation or assessment Not met: EX BPs consult users 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'. The sustainability report states that 'we require our assets to operate grievance mechanisms to receive and address concerns from external stakeholders. We make local communities aware of the mechanisms and make them easy to access. We require that assets report and investigate all complaints'. However, no evidence found of further details about response timescales. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Sustainability report 2018, 04/2019: glencore.com] 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>results of the review.'; ' [...] we let complainants know results and any follow-up actions in culturally and locally appropriate manner. [Our Approach to Sustainability - 2018, 2018: glencore.com]</p> <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: The Company states that 'we have a zero tolerance approach for retaliation against any employee, contractor or third party who reports a concern in good faith and, where required, provide appropriate support for those raising a concern'. [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not met: Practical measures to prevent retaliation: Although the Company indicates in the supplier standards document, in relation to its own raising concerns platform, that it allows anonymous reporting, the actual website indicates that it will depend on the complainant location. If the country's law does not allow to report anonymously, then the system won't accept anonymous reporting. No further practical measure found to prevent retaliation. [Supplier standards, 2019: glencore.com & Raising concerns, 15/07/2019: glencore.raisingconcerns.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects AG suppliers to prohibit retaliation: The Company states in the supplier standards document that 'we encourage our suppliers to ensure their workforce and associated communities have access to grievance mechanisms for the confidential raising of concerns without fear of retaliation'. Also, as indicated in previous indicators, the Company opens its own mechanisms for stakeholders. In relation to this, it also indicates that 'the website allows any stakeholder to raise concern on an anonymous basis. Additionally, there are toll-free telephone numbers for raising concerns, which are published on the Raising Concerns website. Glencore will not tolerate retaliation for reports made in good faith'. [Supplier standards, 2019: glencore.com] • Met: Expects EX BPs to prohibit retaliation: See above. [Supplier standards, 2019: glencore.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms: The Company indicates in its human rights report that '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: glencore.com] • Not met: Complainants not asked to waive rights <p>Score 2</p> <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	0.5	<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: Describes how remedy has been provided: Although the Company reports in relation to specific challenges faced for different human rights risk, no evidence found of specific remedy provided for victims [Human rights report, 2019: glencore.com] • Not met: Says how it would remedy key sector risks <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'. [Human rights report, 2019: glencore.com] • 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)

D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	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 in supplier code or contracts: The supplier standards expects from suppliers to 'offer fair remuneration'. No details found on living wage requirements in contracts or supplier code. [Supplier standards, 2019: glencore.com] Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs (purchasing practices): In its '2018 Our approach to sustainability' document, the Company states: 'We work with all our stakeholders to encourage responsible commodity sourcing. [...] The global relationships we have developed with our key suppliers mean that we have a reliable supply of the products we buy, and can offer them competitively. [...] We have developed best-in-class contract formalisation and management. [...] Glencore's supply chain sustainability strategic objectives are formalised in our Code of Conduct'. However, there is no further information describing specific practices it adopts to avoid undermining HR. [Our Approach to Sustainability - 2018, 2018: glencore.com] Not met: Positive incentives to respect human rights (purchasing practices) Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Identifies suppliers back to manufacturing sites (factories or fields) Score 2 <ul style="list-style-type: none"> Not met: Discloses significant parts of SP and why
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: The Company's Code of Conduct states: 'We prohibit the use of any form of child, forced, or compulsory labour.' However, CHRB could not find further requirements in its contractual arrangements with supplier or supplier code, including verifying the age of job applicants and remediation programmes. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Debt and fees rules in codes or contracts: The Company's Code of Conduct states: 'We prohibit the use of any form of child, forced, or compulsory labour.' However, CHRB could not find further requirements in its contractual arrangements with supplier including debt bondage, refraining for imposing any financial burdens on workers by withholding wages or expenses including recruitment fees. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Free movement rules in codes or contracts: The Company's Code of Conduct states: 'We prohibit the use of any form of child, forced, or compulsory labour.' However, CHRB could not find further workers' freedom of movements requirements in its contractual arrangements with supplier including refraining from restricting workers' movements through the retention of passports or other personal identification or travel documents or bank payment cards or other measures to physically restrict movement. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: 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.' The supplier standards also commit to respect the right of the workforce to freedom of association and collective bargaining'. However, CHRB could not find further FoA & CB requirements in its contractual arrangements with supplier or supplier code of conduct, including measures to prohibit any form of intimidation or retaliation against workers seeking to exercise their rights to FoA and CB. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Supplier standards, 2019: glencore.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its 'Code of Conduct', the Company states: 'We acknowledge that we are all responsible for our own safety and the safety and wellbeing of our colleagues, contractors and the communities in which we work. We expect our people to come to work medically, emotionally and physically fit, to follow health and safety instructions and to take responsibility for their own and their colleagues' safety. [...]. We are committed to a strong safety culture that requires visible leadership from all levels of line management, a high level of engagement from employees and contractors and a focus on hazard identification, risk analysis and risk management.' [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com] • Not met: Injury Rate disclosures: The Company has reported fatalities, LTIFR and TRIFR per region of operation in its sustainability report. However, it is not clear whether this figures include information on health and safety for supplier workers in agricultural activities. It seems that global figures don't include Glencore agriculture for own operations either. [Sustainability report 2018, 04/2019: glencore.com & Databook and GRI references 2018, 2019: glencore.com] • Not met: Lost days or near miss disclosures: See above [Sustainability report 2018, 04/2019: glencore.com] • Not met: Fatalities disclosure: See above [Sustainability report 2018, 04/2019: glencore.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts: In its Code of Conduct, the Company states: '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.' However, it is not clear whether water and sanitation requirements including right to access to safe water are included in its requirements for suppliers. In relation to water, the supplier standards only indicate that 'we expect our suppliers to [...] improve their efficiency of energy, water and natural resource usage'. [Code of Conduct (same in Glencore and Glencore Agriculture web), 2018: glencoreagriculture.com & Supplier standards, 2019: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on water stewardship issues: 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, no evidence found in relation to work carried out with suppliers in agricultural supply chain to improve their practices in relation to access to water and sanitation. [Our Approach to Sustainability - 2018, 2018: glencore.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

D.3 Extractives

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 or achieved • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (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: 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 2017, 2017: glencore.com] Score 2 <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The payment to government report contains payments made in the different countries in which it operates. [Payments to governments Report 2017, 2017: glencore.com]
D.3.3	Freedom of association and collective bargaining (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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Human rights policy states that 'we respect the rights of our employees and contractors, including the freedom of association and collective bargaining'. The Human rights report also indicates that 'we do not tolerate any form of discrimination, intimidation or retaliation against workers, or union representatives, seeking to exercise their rights to freedom of association and collective bargaining'. The current ratio coverage of employees covered by collective bargaining agreement is a proxy for measures in place to prohibit intimidation or retaliation. [Human rights report, 2019: glencore.com] • Met: Discloses % covered by collective bargaining: The Company states that in 2018 'collective bargaining agreements covered 74% of our employees'. [Human rights report, 2019: glencore.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above.
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. The Databook document includes complete data of the company (excluding Glencore Agriculture) [Sustainability report 2018, 04/2019: glencore.com & Databook and GRI references 2018, 2019: glencore.com] • Met: Lost days or near miss disclosures: See above • Met: Fatalities disclosures: See above

			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company sets targets for H&S in its Sustainability Report 2018: '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 2018, 04/2019: glencore.com] • Met: Met targets or explains why not: The Company reports in its sustainability report on the quantitative trends and progress against the targets, and devotes a section to include description of performance and measures. For instance: 'we are continuing our efforts to establish a sustainable culture of safety in our workplaces that contributes towards our longer-term goal of a 50% reduction against 2014 and 2014 baselines for LTIFR and TRIFR respectively by 2020. We are pleased with our progress on a continued reduction in the number of new cases of occupational disease. In 2018, we recorded 32 new cases, a 30% drop on the 46 in 2017'. [Sustainability report 2018, 04/2019: glencore.com]
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: glencore.com] <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: glencore.com] • 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)	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: 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: glencore.com]

			<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: glencore.com] • Met: Ensures Business Partners follow security approach: See above [Sustainability Report, 2017: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assesses and involves communities: In its '2018 Our approach to sustainability' document, the Company indicates: 'Our Group Human Rights Policy requires our assets to conduct risk assessments for conflict and security concerns. If these risks are identified, our assets must align their practices with the Voluntary Principles. At these assets, we have worked to: [...] Implement ongoing performance monitoring through supervision by our security staff and regular meetings with host communities to identify and discuss any concerns.' [Our Approach to Sustainability - 2018, 2018: glencore.com] • 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: glencore.com]
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: The Company indicates that 'we engage with regional and national governments on their work to identify material water stewardship risks, which also helps us improve our water management strategies. Our assets consult their host communities and other local water users to find out their priorities and collaborate on solutions. They share operational plans and increase their understanding of the cultural, economic and environmental value of water in the region. We require them to assess the risk of contamination to waterways and put management plans in place, and to monitor the water they discharge'. The water strategy includes the development and implementation of plans and identifying and setting water-related targets'. Each asset with water risks develops a management plans 'that reflects its lifecycle, the steps needed to eliminate or mitigate water impacts and risks, and the opportunities to improve water performance'. It also lists some water efficiency measures. [Our Approach to Sustainability - 2018, 2018: glencore.com] <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.' In addition, the Company states that 'many of our assets work with their local communities, authorities, agricultural users and other industrial users to create water use strategies. These are designed to support sustainable, equitable access and robust water management by the relevant stakeholders in the catchment area. They cover efficient water use, water reuse/recycling, responsible water disposal...' However, it is not clear which are the actual targets on water stewardship, as the evidence refers to the Company establishing targets and engaging with other users, but no specific targets found. [Our Approach to Sustainability - 2018, 2018: glencore.com] • 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"> • Headline: Seven workers die after landslide hits mine operated by a Glencore subsidiary in the DRC • Area: Health and safety • Story: 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. • 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]
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 <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: In its sustainability reports from 2016 and 2017, the company responds in detail to the report - Their report says "In March of 2016, a tragic incident resulted in the deaths of five employees and two contracted workers at Katanga, a copper asset in the DRC. The north wall of the KOV open pit mine at Katanga partially collapsed. Katanga's management immediately organised a general meeting with all the families to tell them and keep them informed of rescue efforts. As we recovered their bodies, management met each family individually to provide support with funeral expenses and agree compensation. We also worked with the contractor company to ensure that the families of the two missing workers were informed and that similar support was provided. In all cases, Katanga provided employment for another member of the family to ensure continued income, as well as funds to support the education of children of the deceased.
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: 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"> • Met: Policies address the specific rights in question: The company provides qualitative information on the number of fatalities, injury frequency, and high risk incidents for both 2017 and 2018. [Sustainability report 2018, 04/2019: glencore.com]
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders: In their report, the company says that 'Katanga's management immediately organised a general meeting with all the families to tell them and keep them informed of rescue efforts. As we recovered their bodies, management met each family individually to provide support with funeral expenses and agree compensation.' • Met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders: The company says that 'management met each family individually to provide support with funeral expenses and agree compensation and that Katanga provided employment for another member of the family to ensure continued income, as well as funds to support the education of children of the deceased.' • Met: Has reviewed management systems to prevent recurrence: In its report the company says that it implemented short and long-term corrective actions plans that were verified and subsequently monitored by the Group HSEC Committee and senior management teams. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Peruvian community takes Glencore to justice for killing and injuring of protesters • Area: Right to security • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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</p> <p>• Sources: [The Guardian, 31/10/2017 -: theguardian.com][Telesur 01/11/2017 -: telesurtv.net][Leigh Day - 24/02/2016 -: leighday.co.uk]</p>
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
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'. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but reviewed systems to prevent such impacts • 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: industrial-union.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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), 2019: 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), 2019: glencore.com]
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, 10/11/2016: grupoprodeco.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, 10/11/2016: grupoprodeco.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), 2019: 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), 2019: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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), 2019: glencore.com]</p> <ul style="list-style-type: none"> • 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 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), 2019: 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. It is alleged that on February 27, 2016, Afro-Colombian villagers at Roche were violently evicted by Colombian police. Villagers returned to their previous village, due to frustration at conditions in a relocation settlement constructed by Cerrejon Coal. The Colombian ESMAD (Mobile Anti-Disturbance Squadron) unit is alleged to have used excessive violence to expropriate and destroy the home of the Ustate Fuentes family in the community of Roche, an African-descendant community resisting involuntary resettlement in the municipality of Barrancas, La Guajira, Colombia. Several people were injured in the incident, with injuries being reportedly caused by the ESMAD unit. <p>In addition, 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. 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".</p> <ul style="list-style-type: none"> • 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 -]
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 CHRB 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 CHRB indicator. [Cerrejon response, November 2018: cerrejon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 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: glencore.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] <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			satisfactory. [Cerrejon letter Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org] <ul style="list-style-type: none"> • 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 Bruno Creek, 09/05/2019: cerrejon.com & Cerrejon letter Roche Community, 29/01/2019: business-humanrights.org]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.67 out of 4	Out of a total of 51 indicators assessed under sections A-D of the benchmark, Glencore made data public that met one or more elements of the methodology in 34 cases, leading to a disclosure score of 2.67 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 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company discloses a document containing quantitative data and GRI references for 2018 [Databook and GRI references 2018, 2019: glencore.com]
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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 2019 Key Findings report and technical annex 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.