

Company Name Glencore
Industry Agricultural Products (Supply Chain only) & Extractives
Overall Score 33.8 out of 100

Theme Score	Out of	For Theme
4.3	10	A. Governance and Policies
8.4	25	B. Embedding Respect and Human Rights Due Diligence
8.5	20	C. Remedies and Grievance Mechanisms
5.9	25	D. Performance: Company Human Rights Practices
6.8	20	E. Performance: Responses to Serious Allegations

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human Rights Policy: 'Through our policies, standards and processes, we respect human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the UNGPs and the UN Global Compact'. [Human Rights Policy, 2021: glencore.com] Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Company states that 'The United Nations Guiding Principles on Business and Human Rights (UNGPs) set out expectations for all businesses to respect human rights above and beyond compliance with national laws and regulations'. 'Through our policies, standards and processes, we respect human rights in accordance with the [...] UNGPs and the UN Global Compact'. In addition, it indicates in its Code of Conduct: 'We support the UN Guiding Principles on Business and Human Rights'. [Code of Conduct, 2021: glencore.com] & [Human Rights Policy, 2021: glencore.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	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 has a commitment to the ILO Core: The Company states in its Code of Conduct: 'We commit to the International Labour Organisation Declaration on Fundamental Principles and Rights at Work' [Code of Conduct, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<ul style="list-style-type: none"> • Met: Company has a explicit commitment to All four ILO Core: The Company's Human Rights Policy explicitly commits it to respect all the ILO core labour rights. With respect the rights of freedom of association and collective bargaining, it states: 'We respect our workforce's right to the freedom of association and the right to collective bargaining and we foster transparent and collaborative labour relations.' [Human Rights Policy, 2021: glencore.com] & [Code of Conduct, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: Viterra's Human Rights Policy (Glencore's agriculture subsidiary) reads: 'We have zero tolerance towards any form of workplace discrimination, forced labour, child labour, physical assault or harassment within our workplace or along our supply chains. We are committed to providing a safe and healthy workplace, ensuring equal opportunities, paying at least minimum wages in accordance with applicable local laws and regulations and upholding workers' rights to freedom of association and collective bargaining'. In relation to the rest of the Company see description below: Human rights policy covers all ILO core and applies to business partners. [Viterra - Human Rights Policy, N/A: viterra.com] • Met: Company expect BPs/JVs to commit to ILO Core: As indicated above, the Company's Human Rights Policy includes provisions covering all ILO Core. It also indicates: 'This policy applies to all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc worldwide. We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.' [Human Rights Policy, 2021: glencore.com] • Met: Company explicitly list All four ILO for suppliers: Viterra's Human Rights Policy (Glencore's agriculture subsidiary) reads: 'We have zero tolerance towards any form of workplace discrimination, forced labour, child labour, physical assault or harassment within our workplace or along our supply chains. We are committed to providing a safe and healthy workplace, ensuring equal opportunities, paying at least minimum wages in accordance with applicable local laws and regulations and upholding workers' rights to freedom of association and collective bargaining' [Viterra - Human Rights Policy, N/A: viterra.com] • Met: Company explicitly list All four ILO for BPs/JVs: As indicated above, the Company's Human Rights Policy includes provisions covering all ILO Core. It also indicates: 'This policy applies to all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc worldwide. We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.' [Human Rights Policy, 2021: glencore.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: In its Health and Safety Policy it states: 'Our health and safety ambition is zero fatalities, serious injuries and occupational illnesses. We believe our people have a right to go home safe and healthy to their families and their communities at the end of every day. We are committed to identifying and adopting measures to help us achieve this goal and we openly engage with industry peers and other key stakeholders to improve and share best practices'. [Health and safety Policy, 2021: glencore.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company requires in its Supplier Standards: 'We believe all fatalities, injuries and occupational diseases are preventable and expect our suppliers to take the necessary responsibility for maintaining safe and healthy workplaces. We expect our suppliers to: Comply with all applicable laws and regulations to ensure a safe and healthy working environment, Provide a safe and healthy working environment, including appropriate personal protective equipment, Provide regular health and safety training to their workforce, Have appropriate policies and controls protecting the safety and health of their workforce' [Suppliers Standards, 2020: glencore.com] • Met: Expect BPs/JVs to commit to H&S of their workers: As indicated above, the Company commits to health and safety of its workers in its Health and Safety Policy. This document applies to 'all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>worldwide. We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.'</p> <p>[Health and safety Policy, 2021: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its Supplier Standards: 'We expect our suppliers to: [...] Offer fair remuneration, working hours and working conditions'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Suppliers Standards, 2020: glencore.com] • Not Met: Expect BPs/JVs to commit to ILO labour standard or to 48 hours regular work week
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' 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"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards: In its Code of Conduct, the Company states: 'We align our practices with the International Finance Corporation (IFC) Performance Standard 5: Land Acquisition and Involuntary Resettlement'. However, the Company's agriculture subsidiary, Viterra, has its own Code of Conduct and Human Rights Policy. No reference to IFC Performance Standard was found in these documents. [Code of Conduct, 2021: glencore.com] • Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: The Company's agriculture subsidiary Viterra, indicates in its Human Rights Policy: '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. [...] We respect the land tenure rights of indigenous people and communities. We adhere to the principle of free, prior and informed consent.' [Viterra - Human Rights Policy, N/A: viterra.com] • Met: Expecting suppliers to make these commitments: The Company's agriculture subsidiary Viterra, indicates in its Human Rights Policy: 'We respect the land tenure rights of indigenous people and communities. We adhere to the principle of free, prior and informed consent'. [Viterra - Human Rights Policy, N/A: viterra.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water: The Company states in its Environmental Policy: 'We are committed to the principles of water stewardship across our global operations, through the application of strong and transparent water governance, effective management of water, and collaboration with stakeholders to achieve responsible and sustainable water use'. However, no commitment to respect the right to water was found. On the other hand, the Company's agriculture subsidiary, Viterra, has its own Code of Conduct, Health, Safety, environment and Community Policy and Human Rights Policy. No reference to respect the right to water was found in these documents. Previous assessment was based on the Company's sustainability report, which is no longer considered a suitable source for policy statements under CHRB's revised approach. [Environmental Policy, 2021: glencore.com] & [Code of Conduct, 2021: glencore.com] • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments : Also in Viterra's Human Rights Policy: 'In our dealings with our business partners, including contractors, suppliers and joint venture partners, we expect them to respect and comply with our approach to human rights, or one of an equivalent standard.' However, no reference to respect the right to water was found. [Viterra - Human Rights Policy, N/A: viterra.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	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: Women's rights: In its 'Our Approach to Sustainability 2018' the Company indicated: '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'. However, this document is not considered a suitable source for policy statements under CHRB's revised approach. On the other hand, it indicate sin its Human Rights Policy: 'We are committed to respecting human rights in line with the UNGPs. We aim to: make a positive contribution to the advancement of human rights of all people, including vulnerable groups.' However, no mention to women's rights was found. [Our Approach to Sustainability - 2018, 2018: glencore.com] & [Human Rights Policy, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Children's rights: This datapoint was previously assessed as Met based on the Company's Our Approach to Sustainability - 2018 dated 2018 which CHRB no longer considers a suitable source for policy statements. On the other hand, it indicate sin its Human Rights Policy: 'We are committed to respecting human rights in line with the UNGPs. We aim to: • make a positive contribution to the advancement of human rights of all people, including vulnerable groups.' However, no mention to children's rights was found. [Human Rights Policy, 2021: glencore.com] • Not Met: Migrant worker's rights: The indicate sin its Human Rights Policy: 'We are committed to respecting human rights in line with the UNGPs. We aim to: make a positive contribution to the advancement of human rights of all people, including vulnerable groups.' However, no mention to migrant's rights was found. [Human Rights Policy, 2021: glencore.com] • Not Met: Expects suppliers to respect at least one of 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.a.EX	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (EX)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Respect Land as in IFC Performance Standards: In its Code of Conduct, the Company states: 'We align our practices with the International Finance Corporation (IFC) Performance Standard 5: Land Acquisition and Involuntary Resettlement' [Code of Conduct, 2021: glencore.com] • Met: Respecting indigenous peoples' rights or ILO No.169 or UN Declaration: Also in its Code of Conduct, the Company states: 'We respect the rights, interests and aspirations of Indigenous Peoples and acknowledge their right to maintain their culture, identity, traditions and customs. We operate in accordance with the ICMM Position Statement on Indigenous Peoples and Mining'. [Code of Conduct, 2021: glencore.com] • Met: Expecting EX BPs to make these commitments: The Code of conduct states that 'We operate in accordance with the ICMM Position Statement on Indigenous Peoples and Mining', which CHRB considers a proxy for commitment to obtain FPIC. In addition, the HR policy states that 'We operate in accordance with the ICMM Position Statement on Indigenous Peoples and Mining. [...] We work to obtain the free, prior and informed consent of Indigenous Peoples for new projects and changes to existing projects where significant adverse impacts are likely to occur, including as a result of relocation, disturbance of lands and territories or of critical cultural heritage. We seek, through good faith negotiation, to reach agreements with Indigenous Peoples who maintain an interest in, or connection to the land on which we operate, formalising engagement processes and sustainable benefits'. [Human Rights Policy, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company's policy commits to obtain FPIC or zero tolerance to land grabbing: The Company states in its Environmental Policy: 'We are committed to the principles of water stewardship across our global operations, through the application of strong and transparent water governance, effective management of water, and collaboration with stakeholders to achieve responsible and sustainable water use'. However, no commitment to respect the right to water was found. Previous evidence was based on sources which are no longer considerable suitable sources for policy statements under CHRB's revised approach. No further evidence found. [Environmental Policy, 2021: glencore.com] & [Water management performance, N/A: glencore.com] • Met: Respecting the right to water: As indicated above, the Company's Code of Conduct, includes a provision related to IFC and indigenous people rights. It also indicates: 'We assert our influence over joint ventures we don't control to encourage them to act in a manner consistent with our Values and Code'. Also, 'contractors under Glencore's direct supervision and working for a Glencore office or industrial asset controlled or operated by Glencore worldwide'. [Code of Conduct, 2021: glencore.com] • Not Met: Expecting EX BPs to make these commitments
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the	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: Commitment to the Voluntary Principles (VPs): The Company states in its Human Rights Policy: 'We support, implement and promote the Voluntary Principles on Security and Human Rights'. [Human Rights Policy, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	industry – security (EX)		<ul style="list-style-type: none"> • Not Met: Commits to International Humanitarian Law (IHL) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Expects EX BPs to commit to these rights: As indicated above, the Company includes a provision with respect the Voluntary Principles on Security and Human Rights in its Human Rights Policy. This Policy indicates: 'We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.' However, no reference to the international humanitarian law (IHL) was found in a suitable source for policy statements was found. [Human Rights Policy, 2021: glencore.com]
A.1.4	Commitment to remedy	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: The Company commits to remedy: The Company states in its Human Rights Policy: 'We aim to: [...] make a positive contribution to the advancement of human rights of all people, including vulnerable groups. In the event that we cause or contribute to an adverse impact on human rights, we provide for, or cooperate in, processes to enable an appropriate remedy'. [Human Rights Policy, 2021: glencore.com] • Met: Company expect suppliers to make this commitment: The Company indicates in its Supplier Standards: 'We expect our suppliers to Respect human rights and the UN Guiding Principles demonstrated by policies and processes appropriate to their circumstances, including: [...] Processes to enable the remediation of adverse human rights impacts they cause or to which they contribute'. [Suppliers Standards, 2020: glencore.com] • Met: Company expect BPs/JVs to make this commitments: As indicates above, the Company states in its Human Rights Policy that it will provide for remedy when it causes or contributes to an adverse impact on human rights. This document applies to 'all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc worldwide. We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy'. [Human Rights Policy, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives: Although the Company states in its Human Rights Policy that 'In the event that we cause or contribute to an adverse impact on human rights, we provide for, or cooperate in, processes to enable an appropriate remedy', it is not clear whether it commits to collaborate with other remedy initiatives, judicial and non-judicial mechanisms to provide remedy. [Human Rights Policy, 2021: glencore.com] • Not Met: Work with suppliers to remedy impact: The Company indicates in its Supplier Standards: 'We expect our suppliers to Respect human rights and the UN Guiding Principles demonstrated by policies and processes appropriate to their circumstances, including: [...] Processes to enable the remediation of adverse human rights impacts they cause or to which they contribute'. However, no statement committing to work with suppliers to remedy HR impacts was found in a formal policy document. [Suppliers Standards, 2020: glencore.com] • Not Met: Work with EX BPs to remedy impact [Suppliers Standards, 2020: glencore.com] & [Supplier FAQ, N/A: glencore.com]
A.1.5	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): The Company states in its Human Rights Policy: 'We recognise the important role played by human rights defenders when supporting the rule of law, as well as their particular vulnerability to abuse. We are committed to engaging with them in these situations and respecting their rights'. However, no statement committing to not tolerating threats, intimidation, violence, punitive action, surveillance or physical or legal attacks against human rights defenders was found'. [Human Rights Policy, 2021: glencore.com] • Not Met: Company expect suppliers to make this commitment • Not Met: Company expect BPs to make this commitment: In addition, it indicates: 'We communicate our expectation to private and public sector security providers that, respectively, they respect and protect the rights of human rights defenders in line with the UNGPs'. However, 'to communicate expectations' is not considered a formal commitment requirement according to CHRB wording criteria. [Human Rights Policy, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: 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, ECC and HSEC Committees were responsible in 2019 for ensuring that the significant risks identified are properly managed. [...] [HSEC risks management] processes are managed at asset level, with the support and guidance from the central sustainability and HSEC teams, and subject to the leadership and oversight of the HSEC Committee. [...] The main responsibilities of the Committee are: Ensuring 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, community and human rights risks'. [Annual Report 2019, 04/03/2020: glencore.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: Previous assessment was based on 'Sustainable Development Roadshow', dated 2017, which is now out of the three-year timeframe that the methodology requires. No new relevant evidence found in latest review
A.2.2	Board responsibility	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: Board/Committee review HRs strategy: The Company indicates in its Sustainability Report 2020: 'Our Board HSEC Committee sets the strategic direction for our sustainability activities and oversees the development and implementation of our strategic health, safety, environment, community and human rights (HSEC-HR) programmes.' [Sustainability Report 2020, 2021: glencore.com] • Met: Examples/trends re HR discussion in the last reporting period: According its Annual Report 2020, 'During the year, the [HSEC]Committee engaged in: [...] HSEC Strategy: reviewing the Group's annual HSEC strategy and its implementation; Governance: approved new and revised key HSEC and human rights policies; Health and Safety: overseeing the Group's fatality reduction programme [...] Communities: reviewing material issues, investigations and complaints; Social and human rights: monitoring the Group's strategy and reviewing serious incidents [...]'. This source referred to the last reporting year at the time of the review. [Annual Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions: The Company indicates in its Annual Report 2021: 'To enable and ensure stakeholder considerations are reflected in our decision making, the Board: Oversees a strategy than can achieve lasting success and generate sustainable returns for business, whilst maintaining our licence to operate; Has standing agenda items at Board and Committee meetings that reflect our different stakeholder groups' interests; Remains focused on its stakeholder awareness and strengthening its understanding of the broad range of views expressed by Glencore's stakeholders; Holds management to account on their commitments, particularly in relation to matters relating to climate, local communities, and health and safety, ensuring they are acting in accordance with our Purpose and Values.' However, no evidence describing how the experiences of affected stakeholders or external human rights experts informed discussions at board level or a board committee about human rights issues or trends in types of human rights issues. [Annual Report 2021 - Glencore, 2022: glencore.com]
A.2.3	Incentives and performance management	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: Incentives for at least one board member: The Company indicates in its Annual Report 2020 that the Remuneration Committee 'considers corporate performance on HSEC and governance issues when setting remuneration for the Executive Director'. Although the Health, Safety, Environment and Community programs include human rights, no further evidence was found describing the specific incentives/metrics related to human rights for at least one board member. [Annual Report 2020, 2021: glencore.com] & [MS Statement 2018, 28/06/2019: glencore.com] • Not Met: At least one key HR risk, beyond employee H&S: Although the Health, Safety, Environment and Community programs include human rights, no further

Indicator Code	Indicator name	Score (out of 2)	Explanation
			evidence was found describing the specific incentives/metrics related to human rights for at least one board member. Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board process to review business model and strategy: The HSEC Committee's responsibilities are: 'Ensuring 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, community and human rights risks; Ensuring that the policies are effectively communicated throughout the Company and that appropriate processes and procedures are developed at an operational level to comply and evaluate the effectiveness of these policies through: – assessment of operational performance, – review of updated internal and external reports, – independent audits and reviews of performance with regard to HSEC matters, and action plans developed by management in response to issues raised; Evaluating and overseeing the quality and integrity of any reporting to external stakeholders concerning HSEC matters; Reporting to the Board'. The Committee met five times. In addition, in its Annual Report 2021, it indicates: 'The Board and its Committees have standing agenda items to cover their proposed business at their scheduled meetings. [...] The Board and Committee meetings seek to cover all aspects of the Group and, for this purpose, receive input and support from senior management through reports and presentations, which among others cover operational, financial, audit, risk, legal and compliance, governance, and investor relations. [...] Below are details of the main topics which were reviewed, discussed, and when required, approved during 2021: [...] Revised Code of Conduct; [...] Revised Code of Conduct; [...] ; Group policies; [...] Regulatory & Compliance updates; Group Ethics and Compliance Programme; [...] HSEC and Human-Rights policy framework; Human Rights and Communities analysis'. [Annual Report 2020, 2021: glencore.com] & [Annual Report 2021 - Glencore, 2022: glencore.com] • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See A.1.2.a • Met: Senior responsibility for HR implementation and decision making: 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 groupwide human rights performance to our senior management team, which includes the heads of the commodity departments and the Board HSEC Committee'. In addition, it indicates in its Human Rights Report 2019: 'In 2019, we hired a new Group General Manager who is responsible for overseeing the implementation of our human rights policy across the business [...]'- [Human rights report 2018, 2019: glencore.com] & [Human Rights Report 2019, 19/06/2020: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns 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'. It is estimated that this source was published in 2018, which is now out of the three-year timeframe that the methodology requires. On the other hand, on its website, the Company indicates: 'Our Group HSEC and human rights team provides detailed risk management guidance, [...] Our sustainability team provides guidance and thought leadership [in the management of sustainability activities across the Group.] [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain • Not Met: Resources and expertise allocation with EX BPs
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk 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: HR risks is integrated as part of enterprise risk system: The Company indicates on its website: 'Our sustainability risk management framework is aligned with global standards, and helps identify hazards and ways to eliminate, manage or mitigate them. We fully integrate risk management into our business planning and decision-making processes. [...] Our Group HSEC and human rights team provides detailed risk management guidance [...]. They also sign off on the sustainability aspects of the Group risk management framework'. [Sustainability - our approach, N/A: glencore.com] • Met: Provides an example: In its Annual Report 2020, 'A perception that we are not respecting human rights or generating local sustainable benefits could have a negative impact on our ability to operate effectively, our ability to secure access to new resources, our capacity to attract and retain the best talent and ultimately, our financial performance. The consequences of adverse community reactions or allegations of human rights incidents could also have a material adverse impact on the cost, profitability, ability to finance or even the viability of an operation and the safety and security of our workforce and assets'. [Annual Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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: Score of 1 on A.1.2.a: See A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company states in its Human Rights Policy: 'We implement training and awareness programmes to build capacity within our workforce, promoting human rights awareness, competencies and leadership.' In addition, the Company indicates in its MSA 2020: 'We conduct training with our employees and relevant contractors to ensure they understand the behaviour expected of them and provide guidance on the elements of the Group's policy framework. Our training programmes mix e-learning with face-to-face training. We tailor our training and awareness materials and make them relevant by including hypothetical scenarios illustrating how human rights dilemmas might manifest themselves in employees' daily work. Our annual training on the Code of Conduct for employees includes a specific module on

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>human rights applicable to our suppliers and contractors. New joiners receive compliance training sessions on our Values, Code of Conduct, and key compliance risks including how to raise concerns. Where regular access to a work computer is not available, employees and contractors receive training in other ways, including induction sessions, pre-shift training and toolbox talks.' [Human Rights Policy, 2021: glencore.com] & [MS Statement 2020, 2021: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain: The Company indicates in its Suppliers Standards: 'Glencore expects these Supplier Standards will be incorporated, by reference, into all supplier contracts. In addition, Glencore expects all suppliers to maintain agreed standards of quality and timeliness of delivery. All suppliers working on a Glencore site must also comply with site-specific requirements. As a vertically integrated commodity supplier, one Glencore business may supply products or services to another Glencore business. Glencore adheres to its Code of Conduct and policies which meet the expectations of these Supplier Standards. Furthermore, our industrial and marketing related activities in our metals and minerals businesses adhere to the OECD Due Diligence Guideline for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas.' However, no evidence of proactive actions to communicate policy commitments to its suppliers were found. [Suppliers Standards, 2020: glencore.com] • Not Met: Steps to communicate policy commitments to EX BPs: 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.' In addition, Sustainability Report 2020, the Company indicates: 'We published our Supplier Standards (the Standards) in March 2019 and started to work with commodity department teams to embed the Standards into our contracts and update tools and processes to reflect the enhanced due diligence expectations.' However, it is not clear if these are applied to extractive business partners, as 'commodity department' seems to refer to provision of goods. [Sustainability Report 2020, 2021: glencore.com] & [Our Approach to Sustainability - 2018, 2018: glencore.com] • Not Met: Requires suppliers to communicate policy requirements: The Company indicates in its Suppliers Standards: '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, 'to encourage' is not considered a requirement statement. On the other hand, the Company indicates in its Supplier Code of Conduct: 'Additionally, in respect of certain high risk areas, including modern slavery and child labour, we require you to cascade our requirements down to your suppliers and work to eliminate modern slavery and child labour in your supply chains. In respect of all other areas, we also encourage you to set expectations similar to those in our Supplier Code of Conduct for your own suppliers.' However, the requirement focused on modern slavery and child labour, for other areas the Company only "encourage" its supplier to cascade the requirements. [Suppliers Standards, 2020: glencore.com] & [Supplier Code of Conduct, 06/2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual: On its Suppliers - FAQ website section, the Company indicates: 'Are the Supplier Standards a new requirement for doing business with Glencore? No. The Code of Conduct already includes requirements for our suppliers. The Supplier Standards formalise these requirements and provide further detail on our supply chain management practices'. In addition, in its Supplier Code: 'We use the terms 'must' and 'expect' in our Supplier Code of Conduct. Where we use the term 'must', this means that this is a requirement for Glencore suppliers and a failure to meet that requirement will constitute a breach of contract.[...] Our suppliers must have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organisation, or ILO) in their operations and supply chains. [...] Our suppliers must provide a safe working environment for their workers. [...] Our suppliers of metals and minerals must recognise that they have the responsibility to respect human rights and not contribute to conflict, must be committed to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>responsible sourcing' However, no binding commitment to respect other human rights, such as freedom of association and collective bargaining was found. [Supplier FAQ, N/A: glencore.com] & [Supplier Code of Conduct, 06/2022: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Company requires suppliers to cascade down to their suppliers • Not Met: Company requires EX BPs to cascade down to their business relationships
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.a: See A.1.2.a • Met: How workers are trained on HR policy commitments: The Company states in its Human Rights Policy: 'We implement training and awareness programmes to build capacity within our workforce, promoting human rights awareness, competencies and leadership.' In addition, the Company indicates in its MSA 2020: 'We conduct training with our employees and relevant contractors to ensure they understand the behaviour expected of them and provide guidance on the elements of the Group's policy framework. Our training programmes mix e-learning with face-to-face training. We tailor our training and awareness materials and make them relevant by including hypothetical scenarios illustrating how human rights dilemmas might manifest themselves in employees' daily work. Our annual training on the Code of Conduct for employees includes a specific module on human rights applicable to our suppliers and contractors. New joiners receive compliance training sessions on our Values, Code of Conduct, and key compliance risks including how to raise concerns. Where regular access to a work computer is not available, employees and contractors receive training in other ways, including induction sessions, pre-shift training and toolbox talks.' In its ESG Databook, it reports different rates of human rights training for different years (2017: 52%, 2018: 86% and 2019: 91%) that includes 'Employed security personnel only'. In addition, in its Human Rights Report 2019, it states: 'In 2020, we will continue to review and enhance our human rights training programmes across the Group'. [MS Statement 2020, 2021: glencore.com] & [ESG Databook, 05/2020: glencore.com] • Met: Trains relevant managers including procurement: Regarding the training of security personnel, the human rights policy stipulates 'We support, implement and promote the Voluntary Principles on Security and Human Rights. We train our security employees and private security contractors on the Voluntary Principles and are clear about our expectations when engaging with public security.' The Sustainability Report 2019 indicates: 'In line with the Voluntary Principles for Security and Human Rights and our own Security Protocol, we provide human rights training for our private security teams'. And in its previous report (2018), it indicates: 'At these assets, employees and contractors in security functions receive annual training on the VPs'. In addition, the MSA 2020 from Viterra (Glencore's agriculture subsidiary) indicates: 'At the start of employment, we provide our employees with training on Viterra's Code of conduct, which includes our approach to respecting and upholding human rights throughout our operations. [...] In most instances, the training is completed via an e-learning platform. Where employees are not easily able to access online training, we provide guidance in other ways including pre-shift general training and toolbox talks. Additionally, where relevant, our compliance teams give face-to-face training on our compliance policies and procedures and to raise awareness about compliance risks related to their functions'. See above additional information, including how materials illustrate scenarios applied to employees' daily work. [Viterra - Human Rights Policy, N/A: viterra.com] & [Human Rights Policy, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Trains BPs to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates in its Annual Report 2020: 'We regularly monitor and test the implementation of our Ethics and Compliance programme in order to determine its effectiveness, and that it is operationalised and embedded into business operations. The monitoring activities also enable us to identify opportunities for improvement that help develop and evolve the programme and respond to changes in our business, the environments we operate in and applicable

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>laws and regulations. Our Annual Monitoring Plan comprises on-site and desktop reviews. On-site reviews are visits to our offices and/or industrial assets to assess the implementation of our Ethics and Compliance programme.' In addition, in its MSA 2020, it reports: 'We insert different contract terms relating to our Supplier Standards into our supply contracts depending on whether the counterparty and/or country of supply are considered low, medium or high risk. [...] We also require the supplier to (i) report to us any non-compliance with our Supplier Standards and (ii) give us the right to monitor and audit this compliance'. [Annual Report 2020, 2021: glencore.com] & [MS Statement 2020, 2021: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Monitoring implementation of HR policy commitments across global ops and EX BPs: In its MS statement 2020, it reports: 'We insert different contract terms relating to our Supplier Standards into our supply contracts depending on whether the counterparty and/or country of supply are considered low, medium or high risk. [...] We also require the supplier to (i) report to us any non-compliance with our Supplier Standards and (ii) give us the right to monitor and audit this compliance'. In addition, it indicates in its Supplier Code: 'we have a comprehensive framework and action plan for identifying and managing the key risks associated with our suppliers, from supplier due diligence, selection, onboarding and monitoring, through to disengagement.' On the other hand, the Company indicates on its website: 'Independent management teams operate our non-controlled JVs. Along with our JV partners, we participate in board shareholder committees that take key strategic decisions and we use this participation to influence the independent management teams to adopt appropriate operational and governance standards that reflect those of Glencore and the other JV partners.' However, no evidence indicating it monitors human rights commitments in extractive business partners (i.e. contractors) was found. [MS Statement 2020, 2021: glencore.com] & [Sustainability - our approach, N/A: glencore.com] • Not Met: Proportion of supply chain monitored • Not Met: Proportion of EX BP's monitored: The Company indicates that 54% of new suppliers screened using social criteria in 2019. 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. [ESG Databook, 05/2020: glencore.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2.a • 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. [Suppliers Standards, 2020: glencore.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers: Viterras' MSA 2020 (Glencore's agriculture subsidiary) reads: 'We are reviewing other methods of managing this risk in our supply chains such as developing supplier standards, or applying due diligence processes in our engagement of third parties. The aim of this review is to determine a risk-based approach to managing the vast number of suppliers and third parties involved in our supply chains'. However, this is a work in process. It is not clear how human rights currently affects supplier selection (prior to doing business) [Viterra - MS 2020, 2021: viterra.com] • Met: HR affects selection of EX BPs: The supplier standards document states: '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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>or leases materials, products or services directly to Glencore companies, including contract workers'. [Suppliers Standards, 2020: glencore.com]</p> <ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: Viterra's Code of Conduct (Glencore's agriculture subsidiary) reads: 'We may terminate (or decline to renew) the contract of any provider or contractor who breaches the law, the code or Viterra's relevant policies.' Viterra's Human Rights Policy includes human rights provisions. [Viterra - Code of Conduct, N/A: viterra.com] & [Viterra - Human Rights Policy, N/A: viterra.com] • Met: HR affects on-going BPs relationships: The Company's code indicates: 'we may terminate (or decline to renew) the contract of any provider or contractor who breaches the law, the Code or Glencore's relevant policies'. [Code of Conduct, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements • Not Met: Working with EX BPs to meet HR requirements: 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. [Suppliers Standards, 2020: glencore.com]
B.1.8	Approach to engagement with affected stakeholders	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: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company reports in its Annual Report 2020 on its engagement activities with each one of its stakeholder groups. As examples: 'Our people: [How the group engages] Covid-19 engagement; [...] Culture surveys; [...] Communities: [How the group engages] Community liaison teams; Various meeting formats to reflect local expectations [...]; Unions: Regular meetings with asset management, Union participation in asset safety committees [...]'. However, no description of the how it identifies its stakeholders was found. On the other hand, 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, this indicator asked for evidence in the last two years. [Our Approach to Sustainability - 2018, 2018: glencore.com] & [Annual Report 2020, 2021: glencore.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates in its Sustainability Report 2020 'Through our HSEC-HR assurance model, every asset undertakes an annual self-assessment against Group policy implementation. [...] We developed an innovative human rights rating tool to enable consistent assessment of the human rights risk level of each asset across the Group. We developed the tool in consultation with internal and external human rights experts who helped identify country and local risk indicators for each of the Group's salient risks.' In addition, in its Human Rights Report: 'We regularly evaluate our salient human rights risks through engagement with internal and external stakeholders, risk assessments completed by our assets and our analysis of changes in the industry and the social, economic and political context in our host countries'. [Sustainability Report 2020, 2021: glencore.com] & [Human Rights Report 2019, 19/06/2020: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: The Company indicates in its Human Rights Policy: 'We conduct human rights due diligence to identify, prevent and mitigate human rights risks and impacts across our business. We regularly review our salient human rights risks and publicly report on them'. In addition, the Supplier Code states: 'we have a comprehensive framework and action plan for identifying and managing the key risks associated with our suppliers, from supplier due diligence, selection, onboarding and monitoring, through to disengagement. [...] We use a variety of tools to assist us in our due diligence processes, which may include: on-site inspections, third party verification, obtaining information from third party sources including authorities, international organisations and civil society, and consulting experts and technical literature'. [Human Rights Policy, 2021: glencore.com] & [Supplier Code of Conduct, 06/2022: glencore.com] • Met: Identifying risks in EX BPs: See above [Sustainability Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, the Company indicates in its Human Rights Report: 'We regularly evaluate our salient human rights risks through engagement with internal and external stakeholders, risk assessments completed by our assets and our analysis of changes in the industry and the social, economic and political context in our host countries'. In addition, in its Sustainability Report 2020: 'We developed the tool in consultation with internal and external human rights experts who helped identify country and local risk indicators for each of the Group's salient risks.' [Sustainability Report 2020, 2021: glencore.com] & [Human Rights Report 2019, 19/06/2020: glencore.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: The Company described the process to identify and assess its human rights risks in its 'Our approach to Sustainability 2018' document: '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.' However, this document is now out of the three-year timeframe that the methodology requires. In its Sustainability report 2020, the Company indicates: 'Our salient risks assessment considers risks to people. [...] We developed an innovative human rights rating tool to enable consistent assessment of the human rights risk level of each asset across the Group. We developed the tool in consultation with internal and external human rights experts who helped identify country and local risk indicators for each of the Group's salient risks. The tool comprises 20 indicators from credible, international sources and 29 internal indicators from across our assets'. [Sustainability Report 2020, 2021: glencore.com] • Not Met: How process applies to supply chain • Not Met: How process applies to EX BPs • Met: Public disclosure of the results of HR assessment: The Company indicates in its Sustainability report 2020: 'We have identified six salient human rights risks across the Group: labour rights, safety, health, security, inequality and water'. [Sustainability Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	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 2019, 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. [Human Rights Report 2019, 19/06/2020: glencore.com] • Not Met: Description of how global system applies to supply chain • Not Met: Description of how global system applies to EX BPs • Met: Example of actions decided on at least 1 salient HR issues: 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, it reports operations in an area with medium to high-risk levels for access to water. The Company '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'. In addition, the Sustainability Report indicates: 'Antapaccay [...] is also implementing a human rights management framework to strengthen its internal commitment to upholding human rights and to build trust within the region. [...] During 2021, Antapaccay undertook actions that visibly demonstrate its respect for human rights. These included: Completing a human rights due diligence process and identifying risks. Forming a human rights committee, led by the General Manager, with representatives from the general management team. The committee meets monthly to monitor the progress of the annual human rights plan. Internal and external training on Antapaccay's human rights management framework and its objectives and commitments. Building capacity through training 256 companies (of which 39 were local). Training was also provided to around 1,500 workers, 148 private security workers, the 25 members of the Human Rights Committee (internal and external training) and over 50 local and regional journalists' [Human rights report 2018, 2019: glencore.com] & [Sustainability Report 2021 - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective: The Company indicates in the human rights report 2018 that the steering committee conducted a review to examine the implementation of the human rights policy. The review showed that there were four priority areas for improvement including business partners, training and capability building, grievance mechanisms and incident tracking and reporting. In addition, in its Human Rights Report 2019, it indicates: 'We require our assets to set up monitoring and review processes to meet the requirements of the Group Human Rights Policy, and implement risk controls and corrective actions, whenever relevant, to continually improve human rights performance.' However, no evidence found of a system to check if actions carried out to mitigate specific human rights risks are effective, as current evidence refers to gaps in specific company's processes, not measuring whether there have been improvements following actions. No further evidence found in latest report. [Human rights report 2018, 2019: glencore.com] & [Human Rights Report 2019, 19/06/2020: glencore.com] • Not Met: Lessons learnt from checking system effectiveness: The Company indicates in its Sustainability Report 2021: 'In 2021 we completed a review of our local-level complaints and grievances (C&G). The review found that further improvements are required to close gaps to effectively implement C&G processes to facilitate meaningful and responsive engagement and to meet UNGP criteria and user expectations. We are in the process of implementing the review's recommendations of simplifying and regularly reviewing and updating documents. We have also improved knowledge on C&G mechanisms through training sessions. Our revised Social Performance Standard, rolled out during 2021, includes minimum requirements for C&G mechanisms. We have developed a UNGP aligned C&G process template for local use and adaption'. However, current evidence refers to improving grievance mechanisms, which are assessed in a different

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>section of the Benchmark. This subindicator looks for evidence of lessons learnt in relation to specific salient issues. [Sustainability Report 2021 - Glencore, 2022: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders: According its Sustainability Report 2021: Example 1: 'Prodeco also established a specific dialogue process to address the relinquishment of its mining contracts. This process identified opportunities to discuss with affected stakeholders, the causes of the relinquishment, its potential economic and social impacts, and options to address these, together with possible activities to prepare the Cesar region for its post-mining transition. The dialogue sought to define a common vision for the future during a short, medium and long-term post-mining transition. The dialogue process was designed and developed with the support of the Improbable Dialogues Platform, a well-known NGO in Colombia. Improbable Dialogues is an independent platform with expertise in facilitating conversations and providing mediation between communities, business sectors and government authorities with differing, or even opposing, views and backgrounds. Stakeholders participating in the dialogue group included social and community leaders, agricultural associations, victims of Colombia's civil conflict, and entrepreneurs, and representatives from indigenous communities, unions, and universities.' Example 2: 'Antapaccay is committed to its workers and contractors respecting human rights and operating without generating human rights impacts. Its annual human rights plan integrates stakeholders' concerns and priorities, [...] During 2021, Antapaccay undertook actions that visibly demonstrate its respect for human rights. These included: [...] Running focus groups and interviews with community leaders and representatives, employees and union members, suppliers and contractors and other stakeholders, to understand better their human rights perceptions and priorities.' However, this engagement does not seem to be related to a specific impact raised by these stakeholders or on their behalf. No other example was found [Sustainability Report 2021 - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company indicates in its Code of Conduct: 'Our Raising Concerns Programme offers anonymous reporting channels for all Glencore employees, business partners and other stakeholders'. In addition, Viterra's Code of Conduct reads: 'Where a concern remains unresolved through local channels, it can be referred to one of the following corporate channels for raising concerns. If you have access to the internet, you can send an email to codeofconduct@viterra.com or use the 'raising concerns' form on the global Viterra website at viterra.raisingconcerns.org/. The website allows you to raise concerns on an anonymous basis.' [Code of Conduct, 2021: glencore.com] & [Viterra - Code of Conduct, N/A: viterra.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: Also in its Code of Conduct, the Company indicates: 'The Raising Concerns Programme is a corporate programme, and allows you to report your concerns in various languages in a secure manner.' The Raising Concerns website is available in 15 languages. In addition, in its MSA 2020: 'New joiners receive compliance training sessions on our Values, Code of Conduct, and key compliance risks including how to raise concerns. Where regular access to a work computer is not available, employees and contractors receive training in other ways, including induction sessions, pre-shift training and toolbox talks'. On the other hand, Viterra's Raising Concerns platform is available in 19 languages. In addition, Viterra's MSA 2020 indicates: 'The Raising Concerns programme is advertised and promoted via dedicated training and visual material, such as posters, available throughout work sites. It was relaunched in 2020 following the global rebrand from Glencore Agriculture to Viterra. New posters were delivered to all sites in our network including Australia and the UK.' [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org] & [MS Statement 2020, 2021: glencore.com] • Not Met: Describe how workers in the supply chain have access to grievance mechanism • Not Met: Describe how workers in its EX BPs have access to grievance mechanism: The supplier standards document indicates 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'. However, it is not clear if this is a formal expectation/requirement for the (extractive) business partner. [Suppliers Standards, 2020: glencore.com] • Not Met: Expect Suppliers to convey expectation to their own suppliers • Not Met: Expect EX BPs to convey expectation to their own BPs: The supplier standards document indicates 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'. However, it is not clear if this is a formal expectation/requirement for the (extractive) business partner. [Suppliers Standards, 2020: glencore.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in its Human Rights Policy: 'Our Raising Concerns platform is available to all stakeholders, including employees and contractors, and includes a 24/7 confidential reporting line. We continually monitor these processes to identify improvement opportunities.' In addition, in its MSA 2020: 'Raising Concerns allows whistleblowers to raise concerns anonymously in any of 21 languages, by internet or phone. Hotlines are available in most of the countries where we operate, and details are published on the platform's website and on posters at offices and industrial assets.' On the other hand, Viterra's Raising Concerns platform is available in 19 languages. In addition, Viterra's MSA 2020 indicates: 'Anyone, whether from our business or not, can use the programme to raise a concern. It provides different contact options and considers local conditions, languages and ease of use with telephone and online platforms.' [Human Rights Policy, 2021: glencore.com] & [MS Statement 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The raising concerns platform, available to all, is available in 15 languages, and seems to automatically use the language of the country from which the user is connecting. In addition, it indicates in its MS Statement 2020: 'Hotlines are available in most of the countries where we operate, and details are published on the platform's website and on posters at offices and industrial assets'. On the other hand, Viterra's MS Statement 2020 reads: 'The Raising Concerns programme is advertised and promoted via dedicated training and visual material, such as posters, available throughout work sites.' Both the Code of Conduct and the Supplier Code, include references to the Raising Concerns program. However, no further information describing how Glencore or Viterra proactively ensure that all affected external stakeholders at their own operations are aware of it. [MS Statement 2020, 2021: glencore.com] & [Viterra - MS 2020, 2021: viterra.com] • Met: Communities access mechanism direct or through suppliers: On its website 'Speaking openly and raising concerns', the Company states: 'We are committed to creating a culture where everyone feels free to speak about concerns securely and confidentially. That includes employees, contractors, directors and officers working in our offices and industrial assets, as well as third parties such as customers, suppliers or other stakeholders.' In addition, in its Raising concerns FAQ website, it

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>indicates: 'The Raising Concerns Programme is available to all employees and third parties'. The Company indicates in its Supplier Code: 'We expect our suppliers to provide their stakeholders, including their workforce and associated communities, access to grievance mechanisms for the confidential raising of concerns without fear of retaliation. A grievance mechanism is a way for stakeholders to safely and anonymously raise a concern about possible negative impacts on them involving a supplier, and seek remedy.' [Speaking openly and raising concerns, N/A: glencore.com] & [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org]</p> <ul style="list-style-type: none"> • Met: Communities access mechanism direct or through BPs/JVs: On its website 'Speaking openly and raising concerns', the Company states: 'We are committed to creating a culture where everyone feels free to speak about concerns securely and confidentially. That includes employees, contractors, directors and officers working in our offices and industrial assets, as well as third parties such as customers, suppliers or other stakeholders'. In addition, in its Raising concerns FAQ website, it indicates: 'The Raising Concerns Programme is available to all employees and third parties.' [Speaking openly and raising concerns, N/A: glencore.com] & [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org] • Not Met: Expect supplier to convey expectation to their own suppliers • Not Met: Expect EX BPs to convey expectation to their own BPs
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: The Company indicates in its Sustainability Report 2021: 'In 2021 we completed a review of our local-level complaints and grievances (C&G). The review found that further improvements are required to close gaps to effectively implement C&G processes to facilitate meaningful and responsive engagement and to meet UNGP criteria and user expectations. We are in the process of implementing the review's recommendations of simplifying and regularly reviewing and updating documents. We have also improved knowledge on C&G mechanisms through training sessions. Our revised Social Performance Standard, rolled out during 2021, includes minimum requirements for C&G mechanisms. We have developed a UNGP aligned C&G process template for local use and adaption.' However, it is not clear whether users or potential users were engaged during the assessment. [Sustainability Report 2021 - Glencore, 2022: glencore.com] • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism: The Company indicates in its Sustainability Report 2020: 'During 2020, we undertook a Group-wide project to assess our local complaints and grievance processes against the UNGP effectiveness criteria. We identified areas for improvement, including the need for more robust mechanisms to measure the effectiveness of the process, including feedback from potentially affected stakeholders.' However, this is a work in progress. [Sustainability Report 2020, 2021: glencore.com] • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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: Response timescales and how complainants will be informed: The Company indicates in its Raise Concerns FAQ: 'The "Inbox/Check Messages" function allows you to maintain your anonymity while being in direct contact with Glencore. You can access the "Inbox/Check Messages" with your individual incident number and your password. You will receive both credentials when submitting your concern. Please check your inbox frequently, as you may receive updates from Glencore and/or requests for further information to clarify the concern.' However, no information about timescales was found. [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: The Company states in its Whistleblowing Policy: 'The Board of Glencore plc is responsible for overseeing the implementation of this policy and associated procedures, and receives regular reports regarding concerns reported and the investigation of such concerns. The Board will receive regular reports about the effectiveness of the Raising Concerns Programme (RCP), this policy and associated processes'. However, no further information about the escalating process was found, including a description of how complaints or concerns for workers and all external individuals and communities

Indicator Code	Indicator name	Score (out of 2)	Explanation
			may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome. [Whistleblowing Policy, 2021: glencore.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation: The Company states in its Code of Conduct: 'We have zero tolerance for retaliation against anyone who raises concerns about conduct they believe doesn't comply with our Code, policies, or the law, even if the concern isn't substantiated.' [Code of Conduct, 2021: glencore.com] • Met: Practical measures to prevent retaliation: The Company indicates on its Raising Concerns FAQ website: 'We are committed to protecting you from retaliation. If you report, or propose to report a concern, you will be protected from retaliation as required under the Glencore Whistleblowing Policy and by applicable law. We will not tolerate retaliation against you by any member of an investigative team or any other person. Retaliators face serious internal and potential external consequences under applicable legislation or regulations. If we identify anyone involved in retaliation, these individuals will be subject to disciplinary action, which may include dismissal'. Also, as indicated in B.1.5: 'where relevant, our compliance teams give face-to-face training on our compliance policies and procedures and to raise awareness about compliance risks related to their functions'. In addition, the Company indicates in the supplier standards document, in relation to its own raising concerns platform, that it allows anonymous reporting, depending on the complainant location. If the country's law does not allow to report anonymously, then the system won't accept anonymous reporting. [Suppliers Standards, 2020: glencore.com] & [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company indicates in its Supplier Code: 'We expect our suppliers to provide their stakeholders, including their workforce and associated communities, access to grievance mechanisms for the confidential raising of concerns without fear of retaliation. A grievance mechanism is a way for stakeholders to safely and anonymously raise a concern about possible negative impacts on them involving a supplier, and seek remedy.' [Supplier Code of Conduct, 06/2022: glencore.com] • Met: Expect EX BPs to prohibit retaliation against workers/stakeholders: 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'. [Suppliers Standards, 2020: 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: Complainants not asked to waive rights: The Company indicates in its Whistleblowing Policy: 'Nothing in this policy will: prevent Glencore from taking appropriate disciplinary or other action, including court action, against anyone found to be implicated in misconduct after handling and/or investigating a protected concern, or prevent a whistleblower from reporting to and communicating with regulators and certain third parties in relation to a protected concern.' [Whistleblowing Policy, 2021: glencore.com] • Not Met: Company does not require confidentiality provisions: Although the Company's Whistleblowing Policy does not indicate it asks complainants to subscribe a Non-Disclosure Agreement (NDA), no provision indicating it will not ask for a NDA was found. [Whistleblowing Policy, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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: Describes how remedy has been provided: The Company indicates in its Human Rights Report: 'In 2019, our PetroChad (Mangara) (PCM) oil and gas operations updated their Environmental and Social Impact Assessment (ESIA) with support from third party

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>experts. PCM recognises its operations may have negative social or environmental impacts on people near the operating areas. [...] To inform the work the team consulted subject matter experts and conducted a survey of the impacts within the local communities.</p> <p>Based on the research, the team outlined three compensation methods: in-kind, financial and training. Affected persons or communities will have the opportunity to highlight their preferred compensation method for review. The framework details compensation rates for a variety of potential losses including buildings, cultural sites, crops and domestic animals. [...] For example, in 2018, following a berm breach at a water containment area, flooded water passed over local farmland towards a local river. We received a number of complaints from local farmers regarding the damage floodwater did to their crops. In line with PCM's government-approved grievance mechanism and the compensation rates set out in the framework, PCM investigated each case, in the presence of the affected farmers, the village chief and a representative from PCM. Where it was agreed that damage had been caused, the farmers received compensation in line with the framework'. [Human Rights Report 2019, 19/06/2020: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: The Company reports that there were thirteen deaths at its managed operations in 2018: 'we have determined that the incidents leading to these deaths were connected to four of the fatal hazards covered by our established fatal hazard protocols: mobile equipment, ground and/or strata failure; working at height; and energy isolation. In light of these findings, each department is renewing its focus on these four hazards in its annual safety plan. In addition, our assurance activities are prioritising these hazards'. No new relevant evidence found in latest reports. [Human rights report 2018, 2019: glencore.com] • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Number grievances filed, addressed or resolved and outcome achieved: The Sustainability Report indicates: 'During 2020, our Raising Concerns platform received 413 reports of concerns (2019: 500), with the following breakdown: [...], Human rights – 190 (46%);[...] None of the human rights Raising Concerns reports were related to modern slavery.' However, no information found regarding the total number of human rights-related incidents that were addressed or resolved. On the other hand, in Viterra's MSA 2020, the Company reports: 'During 2020, no human rights breaches were reported which includes modern slavery.' [Sustainability Report 2020, 2021: glencore.com] & [Viterra - MS 2020, 2021: vitterra.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Met: Evaluation of the channel/mechanism and changes made as result: The Company indicates in its Sustainability Report 2021: 'In 2021 we completed a review of our local-level complaints and grievances (C&G). [...] The review found that further improvements are required to close gaps to effectively implement C&G processes to facilitate meaningful and responsive engagement and to meet UNGP criteria and user expectations. We are in the process of implementing the review's recommendations of simplifying and regularly reviewing and updating documents. We have also improved knowledge on C&G mechanisms through training sessions. Our revised Social Performance Standard, rolled out during 2021, includes minimum requirements for C&G mechanisms. We have developed a UNGP aligned C&G process template for local use and adaption. ' [Sustainability Report 2021 - Glencore, 2022: glencore.com] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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	<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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. No evidence of living wage requirement included in its contractual arrangements with suppliers or supplier code of conduct was found. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code does not include a provision requiring its suppliers to pay living wages to their workers. [Viterra - MS 2020, 2021: vitterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs (purchasing practices): The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. No evidence was found of practices the Company internally adopts to avoid price or short notice requirements or other business considerations undermining human rights practices it adopts to pay suppliers in line with agreed timeframe(s) and for the amount(s) agreed in the payment terms. • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	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: Child Labour rules in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'Our suppliers must have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organisation, or ILO) in their operations and supply chains. Our suppliers must not provide employment to anyone under the national minimum legal age for employment, and must take steps to ensure that such persons are not employed in their supply chains. Our suppliers must actively work to eliminate modern slavery and all forms of child labour from their supply chains, including by incorporating the requirements in this section into all contracts with subcontractors and suppliers involved in the provision of materials, products or services to us.' However, no evidence found of requirements to verify the age of workers recruited and remediation programmes included in its contractual arrangements with suppliers or supplier code of conduct. [Viterra - MS 2020, 2021: vitterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] • Not Met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	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: Debt and fees rules in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'Our suppliers must have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organisation, or ILO) in their operations and supply chains.' However, no evidence of requirement to prohibit suppliers and any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs included in its contractual arrangements with suppliers or supplier code of conduct was found [Viterra - MS 2020, 2021: vitterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	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: Suppliers to pay workers in full and on time in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'Our suppliers must have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organisation, or ILO) in their operations and supply chains.' However, no evidence of requirement to pay workers in full and on time included in its contractual arrangements with suppliers or supplier code of conduct was found. [Viterra - MS 2020, 2021: vitterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'Our suppliers must have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organisation, or ILO) in their operations and supply chains.' However, no evidence of requirement to prohibit suppliers from retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use company provided accommodation included in its contractual arrangements with suppliers or supplier code of conduct was found. [Viterra - MS 2020, 2021: vitterra.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA & CB rules in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'We expect our suppliers to respect workforce rights to lawful freedom of association and collective bargaining.' However, no evidence of requirement to provide workers' representatives with appropriate facilities to assist in the development of effective collective bargaining agreement(s) or to require that its suppliers prohibit intimidation, harassment, retaliation and violence against trade union members and trade union representatives included in its contractual arrangements with suppliers or supplier code of conduct was found. [Viterra - MS 2020, 2021: viterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] Not Met: How working with suppliers on FoA and CB [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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: Sets out clear Health and Safety requirements: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'Our suppliers must provide a safe working environment for their workers. Suppliers must assess the health and safety hazards and risks in their operations and implement appropriate health and safety controls to protect their workers, including: setting the health and safety requirements for the supplier's operations, including providing appropriate personal protective equipment, training their workers, and applying safe work practices Our suppliers must use and transport hazardous materials safely and responsibly'. [Viterra - MS 2020, 2021: viterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company has reported fatalities, DISR and TRIFR in Viterra's Sustainability report. However, it is not clear whether this figures include information on health and safety for supplier workers in agricultural activities. [Viterra - Sustainability Report 2020, 2021: files.viterra.com.au] & [Databook and GRI references 2018, 2019: glencore.com] Not Met: Fatalities rate for lasting reporting period: The Company has reported fatalities, DISR and TRIFR in Viterra's Sustainability report. However, it is not clear whether this figures include information on health and safety for supplier workers in agricultural activities. [Viterra - Sustainability Report 2020, 2021: files.viterra.com.au] Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> Not Met: How working with suppliers on H&S Not Met: Assessment of the number affected by H&S issues in the SP Not Met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	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: Rules on land & owners in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. No further evidence was found. [Viterra - MS 2020, 2021: viterra.com] Not Met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Includes resettlement requirements that the supplier provides financial compensation Not Met: Assessment of the number affected by land rights issues in its SP Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.b	Water and sanitation (in the supply chain)	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: Rules on water stewardship in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MS Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Code indicates: 'We expect our suppliers to: Comply with all applicable laws and regulations to protect the environment; • Maintain all legally required environmental permits, licenses, approvals and other certifications; Improve their efficiency of energy, water and natural resource usage; Responsibly manage their air emissions, water quality and handling of hazardous materials; • Have appropriate policies and controls to effectively manage their environmental performance'. However, no access to water and sanitation requirements, including refraining from negatively affecting access to safe water, in its contractual arrangements with its suppliers or in its supplier code of conduct was found. [Viterra - MS 2020, 2021: vitterra.com] & [Supplier Code of Conduct, 06/2022: glencore.com] • Not Met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: Viterra (Glencore's agriculture subsidiary) indicates in its MSA Statement 2020: 'We are in the process of evaluating the outcome of the impact assessment and exploring potential forward looking actions. These may include developing a supplier code of conduct and a framework for supply chain due diligence'. Viterra still does not have a Supplier Code, however, Glencore's Supplier Standards indicates: 'We expect our suppliers to: [...] Prohibit all forms of unfair or illegal discrimination based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, trade union membership, political belief or any other potential bias; Offer fair remuneration, working hours and working conditions'. However, no requirements to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and eliminate health and safety concerns that are particularly prevalent among women workers were found in its contractual arrangements with its suppliers or in its supplier code. [Viterra - MS 2020, 2021: vitterra.com] & [Suppliers Standards, 2020: glencore.com] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • 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	<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: Pays living wage or sets target date • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying a living wage • Not Met: Definition of living wage reviewed with unions
D.3.2	Transparency and accountability (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: 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 2020, 2021: glencore.com] <p>Score 2</p> <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 2020, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (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: Steps to avoid intimidation or retaliation: The Human rights policy states: 'We respect our workforce's right to the freedom of association and the right to collective bargaining and we foster transparent and collaborative labour relations.'. 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. No new relevant evidence found in latest reports.'. [Human Rights Policy, 2021: glencore.com] & [Human rights report 2018, 2019: glencore.com] • Met: Discloses % of its total direct operation covered by CB agreements: The Company states: 'We engage with employees, contractors and unions to create safe working conditions in our operations and support freedom of association and collective representation. In 2019, 71% of our employees were covered by collective bargaining arrangements'. [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above.
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (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: Describes process to identify H&S risks and impacts: The Company indicates on its website: 'Our SafeWork framework is risk-based, focusing on eliminating fatalities and serious injuries by identifying the hazards that can result in fatal incidents and developing life-saving behaviours and protocols to target them. SafeWork aims to provide everyone within our business with the knowledge and tools to perform every task safely; the key message is that every individual has the authority to stop unsafe work. [...] We require an effective safety management system at each asset to assure the integrity of plants, equipment, structures, processes and protective systems, as well as the monitoring and review of critical controls. [...] Our sustainability team set targets and develops programmes to drive continual improvement in safety performance. These focus on delivering robust risk identification and assessment processes. All our performance data and targets includes contractors and employees. [...] The SafeWork framework is risk-based. It focuses on identifying the hazards that cause serious injuries and fatalities within our operations and developing life-saving behaviours and protocols to target them' The Company discloses the fundamental components of SafeWork'. In addition, in its Sustainability Report 2021: 'Core to our approach is our risk management system, through which we systematically identify, assess, and manage health and safety hazards and credible risk scenarios associated with our operations. We let our people know that we expect every individual, all employees and contractors, to take responsibility for their own safety, and for the safety of their colleagues and the communities in which they work.' However, no description of the process to identify health and safety risks was found. [Safety, N/A: glencore.com] & [Sustainability Report 2021 - Glencore, 2022: glencore.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company has reported fatalities, LTIFR and TRIFR per region of operation in its sustainability report. [Sustainability Report 2020, 2021: glencore.com] & [ESG Databook, 05/2020: glencore.com] • Met: Discloses Fatalities for last reporting period: The Company has reported fatalities, LTIFR and TRIFR per region of operation in its sustainability report. [Sustainability Report 2020, 2021: glencore.com] & [ESG Databook, 05/2020: glencore.com] • Met: Occupational disease rate for last reporting period: The Company has reported also information about new occupational diseases: 111 (2020), 106 (2019) [Sustainability Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company discloses some information about its health and safety targets in its Sustainability Report 2020: '[...] our ambitious five-year targets of 50% reduction of Group LTIFR by the end of 2020 against a 2015 baseline of 1.34 and 50% reduction of Group TRIFR by the end of 2020 against a 2014 baseline of 5.02. [...] our goal of zero fatalities.' However, no target related to occupational disease was found. [Sustainability Report 2020, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Met targets or explain why not or what is doing to improve management systems: 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 saddened to report that during 2020, eight people lost their lives at our operations, compared to seventeen during 2019. We believe all loss of life is unacceptable and we are determined to eliminate fatalities across our business. During the year, both our lost time injury frequency rate (LTIFR) 1,2 and total recordable injury frequency rate (TRIFR) were slightly lower than the previous year at 0.94 (2019: 0.99) and 2.6 (2019: 2.9) respectively. While our year-on-year LTIFR and TRIFR decreased, we did not meet our ambitious five-year targets of 50% reduction of Group LTIFR by the end of 2020 against a 2015 baseline of 1.34 and 50% reduction of Group TRIFR by the end of 2020 against a 2014 baseline of 5.02. We have fed the learnings from improving our performance into the work we have undertaken on reviewing and revising our SafeWork programme.' [Sustainability Report 2020, 2021: glencore.com]
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (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: Process to identify indigenous rights holders: In its Human Rights Report, the Company discloses information about the Aurukun Bauxite Project, showing how it identifies indigenous rights holders: 'Since our selection as the preferred entity to develop this resource in 2015, we have been engaging with the Aurukun community, particularly the Wik Waya families who we identified as directly affected Traditional Owners through self-identification, anthropological studies and consultation within the community and NAK.' [Human Rights Report 2019, 19/06/2020: glencore.com] • Met: How engages with indigenous communities during assessment: The Company reports on the Aurukun Bauxite Project, showing how it engaged with communities in carrying out the assessment of potentially affected indigenous people: 'Since our selection [...] we have been engaging with the Aurukun community, particularly the Wik Waya families who we identified as directly affected Traditional Owners through self-identification, anthropological studies and consultation within the community and NAK. Any future development of the resource requires government and regulatory approvals in addition to agreement from the affected Wik Waya families. Our approach is fully aligned with the principles of Free, Prior and Informed Consent of Indigenous Peoples and consistent with International Council on Mining and Metals' (ICMM) Indigenous Peoples and Mining Position Statement.' In addition, it summarizes the objectives of the 'Community and stakeholder engagement' as one of the key processes that support our human rights programmes: 'Identify relevant, potentially impacted stakeholders; Inform human rights risks assessments and/or impact assessments; Determine if risk management activities are appropriate and effective; Consult on design and effectiveness of grievance mechanisms; Participate in multi-stakeholder forums to understand and discuss best practice/lessons learned'. Finally, in its Sustainability Report 2020: 'In the DRC, our KCC asset is resettling the community of Kapata as part of its extension of the East Mashamba dump. The process for identifying, investigating and engaging with the community began late in 2019. The assessment identified households likely to be impacted by the mine's future activity. Due to restrictions imposed by Covid-19, KCC has suspended the resettlement project.' [Human Rights Report 2019, 19/06/2020: glencore.com] & [Sustainability Report 2020, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to FPIC: 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.' However, this document is no longer available in the public domain. On the other hand, in its Human Rights Policy, the Company states: 'We operate in accordance with the ICMM Position Statement on Indigenous Peoples and Mining. [...] We work to obtain the free, prior and informed consent of Indigenous Peoples for new projects and changes to existing projects where significant adverse impacts are likely to occur, including as a result of relocation, disturbance of lands and territories or of critical cultural heritage. We seek, through good faith negotiation, to reach agreements with Indigenous Peoples who maintain an interest in, or connection to the land on which we operate, formalising engagement processes and sustainable benefits.' However, 'to work to' is not considered a formal commitment statement according to CHRB wording criteria. Although the Company indicates that it operates in accordance with the ICMM position statement (which includes FPIC), CHRB only accepts ICMM position statement when the Company also highlights the FPIC requirement included. The document 'approach to sustainability contained such commitment'. However, it was no longer found in public domain. [Human Rights Policy, 2021: glencore.com] • Not Met: Gives recent example of obtaining FPIC or dropping deal: With respect the Aurukun Bauxite Project, the Company indicates: 'Any future development of the resource requires government and regulatory approvals in addition to agreement from the affected Wik Waya families. Our approach is fully aligned with the principles of Free, Prior and Informed Consent of Indigenous Peoples and consistent with International Council on Mining and Metals' (ICMM) Indigenous Peoples and Mining Position Statement. The Project designed the engagement process with the Traditional Owners to: Keep them fully informed about the Project and its potential impacts and benefits; Enable them to make decisions freely without coercion, intimidation or manipulation; and Give them sufficient time to contribute to project decisions and discuss ways to maximise opportunities and minimise potential impacts.' In addition, with respect McArthur River Mine and the Bing Bong Loading Facility: 'McArthur River Mine is committed to meaningful engagement with Traditional Owners that respects cultural heritage and helps build the long-term social and economic prosperity of local Indigenous communities. We recognise that while McArthur River Mine complies with the law, we need to do more to meet community expectations going forward. To demonstrate our commitment, we have entered into discussions with the Northern Land Council (NLC) and Traditional Owners to negotiate an Indigenous Land Use Agreement in relation to the McArthur River Mine and the Bing Bong Loading Facility. This will involve broad consultation with Traditional Owners on a variety of matters, including sacred sites and cultural heritage protection. We encourage Traditional Owners to get involved and engage by contacting the NLC to ensure that their voices are heard. In 2017, we signalled to the Northern Land Council that we would enter good faith negotiations for an Indigenous Land Use Agreement once we had certainty on continued operations at MRM. With the approval of our Mining Management Plan late last year, we look forward to progressing negotiations.' However, it is not clear whether consent was obtained or it decided not to pursue the land or resources impacting on indigenous peoples. [Human Rights Report 2019, 19/06/2020: glencore.com] & [MRM commences Indigenous Land Use Agreement (ILUA) discussions, 2021: glencore.com.au]
D.3.6	Land rights: Land acquisition (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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How valuation and compensation works: The Company states: 'We seek to avoid resettlement wherever possible. When unavoidable, we proceed in accordance with IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement. Throughout, our priority is to ensure that all affected stakeholders have full participation. Following any resettlement, through ongoing monitoring, we seek to ensure the communities involved can maintain productive livelihoods.' In South Africa, our Goedgevonden complex completed the construction of houses for the remaining six families in late 2020, in line with the settlement and relocation agreement agreed in 2018. Five of the six families relocated in December 2020, and engagements are ongoing with the remaining family.' However, no evidence found regarding the valuation and compensation process (methods, legitimate tenure rights holders participation in the valuation). No further evidence found in latest report. [Sustainability Report 2020, 2021: glencore.com] • Not Met: Steps to meet IFC PS 5 in state deals
D.3.7	Security (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: How implements security (inc VPs or ICOC) and provides an example of how ensures respect: The Company explains its approach to security and human rights: 'Our Security Standard details process and behavioural requirements for security teams and is aligned with the Voluntary Principles. Our assets provide training to both directly employed and contracted security officers and engage host governments and local communities on the impact of security arrangements. We require all contracted security personnel to adhere with our Supplier Standards, including demonstrating respect for human rights. When assets are located in areas with a high-risk of security related human rights impacts we apply the Voluntary Principles framework to strengthen our approach to security management'. [Human Rights Report 2019, 19/06/2020: glencore.com] • Met: Ensures Business Partners/JVs follow security approach: See above [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assesses and involves communities input: In its Sustainability Report 2020, 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.' However, no evidence describing how it involves communities inputs was found. On the other hand, in its 'Our approach to Sustainability' document (2018), it indicated: '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.' However, this document is now out of the three-year timeframe that the methodology requires. [Sustainability Report 2020, 2021: glencore.com] • Not Met: Two examples of working with local community: The Company indicates in its Sustainability Report 2020: 'In 2019, following a security-related incident, we engaged external human rights experts to undertake an independent human rights review to build an understanding of stakeholder perceptions and concerns about Antapaccay.' No other example was found. Previous assessment was based on "Sustainability Report 2017", dated 2018, which is now out of the three-year timeframe that the methodology requires. [Sustainability Report 2020, 2021: glencore.com]
D.3.8	Water and sanitation (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: Action to prevent water and sanitation risks: The Company Sustainability Report 2020: 'During 2020, we established a water working group, comprised of internal subject matter experts, made up of representatives from all our operating regions and commodity departments. The purpose of the working group is to strengthen our approach to water management, governance, and development of both internal and external water targets.[...] All managed operations located in water-stressed regions to finalise the assessment of their material water-related risks, set local targets, and implement actions to reduce impacts and improve performance by the end of 2023.[...] The majority of our assets have reported full implementation, and ongoing implementation efforts are primarily underway at recently acquired sites or those with substantial operational changes. The Guideline applies a risk-based approach and covers the minimum requirements for water governance, the identification and evaluation of water-related risks and opportunities, the mitigation of identified risks and impacts, the management of water in terms of quality and quantity and engagement with relevant stakeholders.' [Sustainability Report 2020, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Water targets considering local factors: The Sustainability Report indicates: 'We are committed to ensuring good water management is in place at all of our assets and undertake detailed assessments, target setting, monitoring and implementation of corrective actions. Our assets consult their host communities and other relevant local water users to understand local priorities and to collaborate on sustainable solutions. [...] All managed operations located in water-stressed regions to finalise the assessment of their material water-related risks, set local targets, and implement actions to reduce impacts and improve performance by the end of 2023' On the other hand, the Company's website summarizes its efforts towards a responsible water management, including different targets to improve its overall water performance, such as: 'In Peru, Yauliyacu is targeting a 15% reduction per year of freshwater used at the mine's accommodation and in the concentrator plant by the end of 2021, against a 2018 baseline. [...] In the UK, Britannia Refined Metals (BRM) targeted a 5% reduction in freshwater consumption intensity (per tonne of metal produced) by the end of 2020, against a 2015 baseline. BRM also targeted a 5% year-on-year reduction of potable water consumed by 2023, against a 2020 baseline. [...] [Sustainability Report 2020, 2021: glencore.com] & [Water management performance, N/A: glencore.com] Met: Reports progress in meeting targets and shows trends in progress made: The Company reports its progress with respect its water targets on its website: 'In 2020, Yauliyacu successfully achieved a fresh water reduction of 18%, against a 2018 baseline, mainly due to the improvement of the main supply system, the improvement of piping infrastructure, and the introduction of recycled water use in the concentrator plant process. [...] At the end of 2020, BRM had successfully achieved a total reduction in freshwater consumption intensity of 8%, exceeding their target, achieved by installing telemetric water meters, which automatically fed back data to a central system. This allowed both real time data and tracking of historic data for individual areas and processes of the asset. [...] BRM is progressing actions to achieve the reduction through using pre-treated surface water for use by the mechanical sweepers, low level dust suppression (sprinklers) and other water reduction options.[...]' [Water management performance, N/A: glencore.com]
D.3.9	Women's rights (in own extractive operations, which include 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: Process to stop harassment and violence against women Not Met: Working conditions take account of gender Not Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates in its Equality of opportunity Policy : 'We provide equal opportunity to our employees regardless of race, colour, religion, sex, sexual orientation, gender identity or expression, family status, pregnancy, age, national origin or ancestry, disability status, union affiliation, political belief or other characteristic protected by law.' However, no further information was found describing how it measures and takes steps to address any gender pay gap throughout all levels of employment. [Equality of Opportunity Policy, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Meets all requirements under score 1 Not Met: Provides analysis of trends demonstrating closing gender pay gap

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Area: Health & Safety Headline: 20 people die in a collision involving a Glencore truck in DRC Story: On February 22, 2019, a truck owned by a contractor for a Glencore PLC mining company in the Democratic Republic of Congo, Mutanda Mining, collided with two people carriers about 50km from the site, killing 20 and injuring 9. Mutanda said in a statement that it will work with "relevant government agencies, including the emergency services, to provide support to [the victims] and to the local communities." [The Times, 23/02/2019, "Twenty die in acid tanker crash near Glencore mine": thetimes.co.uk] [The Wallstreet Journal, 22/02/2019, "Glencore Contractor in Congo Spills Acid, Killing 20": wsj.com] [Mining Weekly, 22/02/2019, "Acid truck collision near Glencore mine in the DRC kills 20 people": miningweekly.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: In an emailed statement to Mining Weekly Online, Glencore stated: "Glencore can confirm that Mutanda Mining (Mumi) assisted the local emergency services in a rescue operation when an acid truck collided with two people carriers about 50km from the site. The incident took place at around 6pm on 20th February. Tragically around 20 people lost their lives in the collision. The truck belonged to a third-party logistics company contracted by Mumi for the transport of sulphuric acid to site. Our condolences go to the families and friends of those that have been impacted by this devastating event. Mumi will continue to work with the logistics company and relevant government agencies, including the emergency services to provide support to them and to the local communities." Additionally, the company published a position statement on the acid spill accident, outlining the events and actions taken afterwards. [Mining Weekly, 22/02/2019: miningweekly.com] [Position Statement on the Acid Spill Accident, 11/2020: glencore.ch] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: The company response addresses what happened, where it happened, how many people were killed, how the company is linked to the event, and what is being done to remedy victims. [Mining Weekly, 22/02/2019: miningweekly.com] [Position Statement on the Acid Spill Accident, 11/2020: glencore.ch]
E(1).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: The company has engaged with the contractor involved in the incident to identify the root causes of the accident. However, there is no evidence of the company or the contractor engaging with the affected stakeholders in order to investigate the events. <p>In addition, the company provided feedback for this indicator, however, it was found not relevant for the assessment and included no further evidence. [Human Rights Report 2019, 19/06/2020: glencore.com]</p> <ul style="list-style-type: none"> • Met: Identified cause: Even though the company does not disclose the findings of the investigation into the root causes of the event, it claims to have captured them. [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: According to its Human Rights report of 2019, the company investigated the case and 'worked with the contractor to identify the root causes of the accident. The learnings were captured and appropriate measures put in place to avoid a repeat of this incident. Internally, the incident prompted a review of our Road Transportation Protocol. We convened two workshops for approximately 80 experts across the business to ensure our requirements are clear and fit for purpose. The workshops identified a series of improvements and we are rolling out the updated protocol in 2020 across our global operations and marketing divisions. [Human Rights Report 2019, 19/06/2020: glencore.com] • Not Met: Stakeholder input to steps taken: The affected stakeholders were not involved in the process to identify the root causes for the accident or the workshops. Therefore, there is no evidence that they were provided the opportunity to influence the changes to the management systems. <p>In addition, the company provided feedback for this indicator, however, it was found not relevant for the assessment and included no further evidence.</p>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: The company provided assistance to the contractor and local authorities in the rescue operation, support to affected stakeholders and communities including food aid and fertilizer and offered ongoing medical assistance to the people who were most severely injured. The company also provided guidance to the contractor during the remediation activities. It also offered its apologies to the affected stakeholders. [Position Statement on the Acid Spill Accident, 11/2020: glencore.ch] • Not Met: Evidence for lack of impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: There is no evidence suggesting that the remedies were not satisfactory to the affected stakeholders • Met: Remedy delivered: According to the company's statements the remedies were provided.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Right to security of persons; land rights • Headline: Peruvian community protests Glencore's land annexation • Story: Twenty-two members of communities surrounding the Tintaya and Antapaccay mines have filed a complaint against Glencore in the High Court in London, claiming the company should be held liable for the killing, injury and unlawful detention of protestors in the Espinar Province of Peru. The abuses were allegedly perpetrated by the Peruvian National Police and occurred during a disturbance near the Tintaya mine in May 2012. The case was heard in October 2017 in the High Court in London. The original claim was brought against Xstrata which was merged with Glencore in 2013. Since the remedial action is still disputed this allegation is still valid. On December 29, 2018, farmers held a protest against the Antapaccay mine, owned by Glencore, when the company began removing land from an area that they claim has been their property for many years. Francisca Umasi-Ihui and Vidal Coaquira-Umasi, who were participating in protests, were allegedly attacked by armed security company Grupo Liderman (part of Carlyle Group) and police officers. Four members of Antapaccay's security team were also reportedly injured during this event. According to press sources, it was not the first time that security of the mine tried to intimidate local community. In March 2018, security guards allegedly threatened to kill farmers if they not accept to leave their land. [The Guardian, 31/10/2017, "UK mining firm in court over claims it mistreated environmental activists": theguardian.com] [Leigh Day, 24/02/2016, "Hearing in London High Court in claim by Peruvians against mining firm": leighday.co.uk] [La República, 10/02/2019, "Campesinos de Espinar reclaman por maltratos a empresas Glencore y Carlyle Group": larepublica.pe]
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: The Guardian reported that 'the Company [Glencore] denies liability, arguing that police protection was necessary since thousands of protesters, many carrying traditional slingshots, were marching towards the mine. Xstrata also said that the Peruvian national police operated independently and it had no control over their behavior. In response to the confrontation that occurred on December 29, 2018, Glencore issued a letter acknowledging the incident, calling it "regrettable." [The Guardian, 31/10/2017: theguardian.com] [Business and Human Rights Resource Centre, 15/02/2020, "Respon to the BHRC Antapaccay": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: In response to the confrontation that occurred on December 29, 2018, Glencore issued a letter stating that "Glencore is aware of allegations made by Ms Umasi and Mr Coaquira in respect of December event which occurred inside Antapaccay's land. This event is regrettable. We understand that four members of Antapaccay's security team were injured during this event. Glencore takes very seriously our human rights commitment towards communities where we and our business partners operate, and we expect our business partners to do the same." Glencore also said that it will be undertaking an independent review of the recent event. <p>With regard to the incident that occurred in 2012 however, the company has not provided a detailed response. Feedback provided by the company to CHRB on this indicator was not sufficient to change the assessment.</p>
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: Engaged with stakeholders: After the 2018 incidents the company engaged an independent reviewer who held consultations with several stakeholders including the affected community. The aim of the review was to identify the underlying causes that led to the events [Foley Hoag LLP, 09/12/2019, "Summary Assessment Regarding the Antapaccay Mine's Social License to Operate in Espinar, Peru": glencore.com] [Human Rights Report 2019, 19/06/2020: glencore.com] • Met: Identified cause: The report issued by the reviewer identifies several underlying issues that led to the events. [Foley Hoag LLP, 09/12/2019: glencore.com] [Human Rights Report 2019, 19/06/2020: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The review findings and recommendations were included in the ongoing approach for assessing and mitigating human rights risks. The findings were also incorporated in an action plan. [Human Rights Report 2019, 19/06/2020: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Stakeholder input to steps taken: Engagement with the affected stakeholders informed the review that was the basis for the action plan. The review also informed the ongoing approach for assessing and mitigating human rights risks [Foley Hoag LLP, 09/12/2019: glencore.com] [Human Rights Report 2019, 19/06/2020: glencore.com]
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: Provided remedy: The company stated "We understand that four members of Antapaccay's security team were injured during this event. Glencore takes very seriously our human rights commitment towards communities where we and our business partners operate, and we expect our business partners to do the same." Glencore also said that it will be undertaking an independent review of the recent event. However, there is no information available suggesting the company provided remedy to the affected stakeholders. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Access to water, right to land, right to livelihood, right to security of persons • Headline: Cerrejon continues to face criticism over the numerous problems communities face at the Cerrejón Coal Mine in Colombia • Story: Glencore is a joint-venture partner (with BHP Billiton and Anglo American) in the Cerrejon coal mine in Colombia. On August 21, 2017 Colombia's Constitutional Court suspended Cerrejon's permit to divert a stream because of inadequate consultation with local indigenous groups. The court postponed the start of mining activity towards the natural course of Bruno Creek for a period of three months while it considered an application for the protection of constitutional rights (tutela) relating to the communities of La Horqueta, Paradero and Gran Parada. In November the court found the project to divert the river would indeed threaten fundamental rights. The Constitutional Court also ordered that works continue on the maintenance, stabilization, and preservation of the new course in accordance with the respective environmental plan and the authorizations granted by the environmental authorities. It is also alleged that the transnational mining conglomerate Carbones del Cerrejón, who owns the El Cerrejón mine, consumes 24 million liters of water per day in a department like Guajira where 87 percent is desert. The population is experiencing a dramatic shortage of water, which in the last two years has reportedly caused the death of hundreds of children due to malnutrition and the diseases caused by water scarcity. In February 2019, indigenous and afro-descendent communities in the state of La Guajira launched a legal challenge against a recent modification of the environmental license for the Cerrejón coal mine. They argued that the alteration was carried out without an Environmental Impact Assessment, and requested the suspension of any further alteration of the license that would allow an expansion of mining activities. Jakeline Romero, a plaintiff from the community organisation, Fuerza de Mujeres Wayúu, said that the mine has impacted on the health of the Wayúu people, as well as impacting on the environment and access to water. The legal team claimed that the expansion of the mine would exacerbate the current humanitarian crisis in La Guajira caused by the mine, including a loss of food security and lack of access to water that has influenced the deaths of 5,000 children and malnutrition of 40,000. The Indigenous Wayuu people of Colombia have also alleged that when the Cerrejon coal mine opened the river they rely on to grow crops began to dry up and became contaminated. The Guardian also stated in an October 2018 article that: "In the neighbouring department of El Cesar, three Drummond mine union leaders were murdered in 2001. More recently in La Guajira, activists who resist Cerrejón's expansion plans have received renewed death threats. Despite the 2016 Colombian Peace Agreement, there has been a spike in assassinations of social leaders nationwide. At least 123 were murdered in the first six months of 2018". <p>[The Business and Human Rights Resource Centre, 21/08/2017, "Colombia: Constitutional Court suspends Cerrejon's permit to divert stream over lack of consultations with local indigenous groups; incl. company statement": business-humanrights.org] [Mines and Communities, 27/02/2016, "Cerrejon Coal: brutal evictions of villagers resisting relocation": londonminingnetwork.org] [The Guardian, 01/10/2018, "Blood coal: Ireland's dirty secret": theguardian.com] [The</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Business and Human Rights Resource Centre, 02/03/2019, "Colombia: Indigenous communities file lawsuit over lack of impact assessment in alteration of environmental license"
E(3).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: At the time the alleged events took place, Cerrejon was an independently managed and operated joint venture. Glencore was linked to it as a partner. Though Cerrejon itself has made some public statements, Glencore has not responded publicly to the allegations, nor has it pointed to Cerrejon's comments in a public statement and, therefore, does not meet the requirements for this indicator. [Greennews, 27/02/2019: greennews.ie] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(3).2	The Company has appropriate policies in place	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: Engaged with stakeholders: There is no evidence that Cerrejon has investigated the underlying causes of water shortages or food security. There has been stakeholder engagement through community consultations, however, those were directed at resettlement issues. There is no evidence suggesting the company has engaged with the affected stakeholders regarding the death threats against activists. <p>In addition, the company points to the stakeholder engagement carried out by the interinstitutional group tasked with the technical investigation by the Colombian Constitutional Court in 2017. However, as one of the affected communities challenged the legitimacy of this group and therefore did not engage this cannot be considered to be meeting the requirements for this datapoint. [Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org] [Cerrejon, 16/08/2019, "Cerrejón reports on partial diversion of Bruno Creek and application of constitutional court ruling": cerrejon.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The company conducted community consultations regarding resettlement issues, however, it did not present investigative results regarding the underlying issues of the events. <p>In addition, the company provided feedback for this indicator and there are some statements in it. However, the feedback was found not relevant for the assessment.</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company provided feedback for this indicator and there are some statements in it. However, the feedback was found not relevant for the assessment. • Not Met: Stakeholder input to steps taken: The company provided feedback for this indicator and there are some statements in it. However, the feedback was found not relevant for the assessment.
E(3).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: Provided remedy: 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. <p>In addition, the company provided feedback for this indicator, however, it was found not relevant for the assessment as Glencore is not confirming anything that was pointed out. [Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: On the basis of evidence available to the CHRB no remedies were provided. <p>In addition, the company provided feedback for this indicator, however, it was found not relevant for the assessment as Glencore is not confirming anything that</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>was pointed out. [Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Remedy delivered: On the basis of evidence available to the CHRB no remedies were provided. <p>In addition, the company provided feedback for this indicator, however, it was found not relevant for the assessment as Glencore is not confirming anything that was pointed out. [Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Health & Safety <ul style="list-style-type: none"> • Headline: Collapse of terraces at Kamoto Copper's KOV Open-Pit Mine kills at least 43 artisanal miners in Congo <ul style="list-style-type: none"> • Story: On June 28, 2019, Reuters reported that 43 artisanal miners were killed in a landslide at one of Glencore PLC's (Glencore) open-pit mining facilities in the Democratic Republic of Congo. The incident resulted from the collapse of two galleries overlooking the main extraction area, where miners, operating illegally, were caught in the subsequent cave-ins. The accident occurred on a mine owned by KOV, part of the Kamoto Copper Company, which is controlled through a 75% stake by Glencore's subsidiary, Katanga Mining. Glencore responded to the incident and said it was assisting the search and rescue operations conducted by local authorities but 'There was no link between these incidents and KCC's operational activities'. The company also said its sites were being affected by an increase illegal mining. <p>[Reuters, 27/06/2019, "Accident at Glencore mine kills at least 41 in Congo": uk.reuters.com] [CNN, 27/06/2019, "At least 36 killed in Congo mine collapse": cnn.com] [Financial Times, 27/06/2019, "Glencore shares fall after DRC mine collapse": ft.com] [The Guardian, 27/06/2019, "Dozens killed in DRC Glencore copper mine accident": theguardian.com]</p>
E(4).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: In response to the incident, Glencore PLC (Glencore) issued a statement acknowledging the deaths of the artisanal miners at the Kamoto Copper Company (KCC) open-pit mining site. In the statement, Glencore also acknowledged the increasing presence of illegal artisanal miners throughout its industrial mining concessions in the Kolwezi area of the Democratic Republic of Congo. [Announcement regarding fatalities at KCC, 27/06/2019: glencore.com] & [Statement on FARC in Area around KCC, 04/07/2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In response to the incident at the Kamoto Copper Company's (KCC) mining site, Glencore PLC (Glencore) issued an official statement to the public available on its website. Glencore's statement mentioned the 19 fatalities and acknowledged that there may be further fatalities. Glencore also provided details on how the miners lost their lives: "The illegal artisanal miners were working two galleries in benches overlooking the extraction area. Two of these galleries caved in. These incidents were not linked to KCC operations or activities. KCC is currently engaged in assisting search and rescue operations with the local authorities." Also, Glencore highlighted the danger that illegal mining posed on its sites, stating that KCC was seeing 2,000 miners trespass onto its concessions every day, presenting a significant risk to its employees, operating equipment, and the illegal artisanal miners themselves. Lastly, Glencore also stated that KCC is committed to acting responsibly in a manner that respects human rights and in line with its commitments to the Voluntary Principles on Security and Human Rights. [Announcement regarding fatalities at KCC, 27/06/2019: glencore.com] & [Statement on FARC in Area around KCC, 04/07/2019: glencore.com]
E(4).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: Engaged with stakeholders: The company states it is continuing to engage with relevant stakeholders to understand the underlying issues for artisanal mining in the KCC area. [KCC 27 June Incident Fact Sheet, 08/07/2019: glencore.com] & [Letter to Voluntary Principles Secretariat, 04/07/2019: glencore.com] <ul style="list-style-type: none"> • Met: Identified cause: The company presents findings of root causes for artisanal mining in the KCC area. [KCC 27 June Incident Fact Sheet, 08/07/2019: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>glencore.com] & [Announcement regarding fatalities at KCC, 27/06/2019: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: Glencore PLC, through its subsidiary KCC, is working to identify and implement a long-term, sustainable solution to illegal mining in the DRC. Additionally, in the DRC, Glencore supports targeted programs to reduce illegal artisanal mining, through local co-operatives that work with local communities to generate sustainable income sources. [Announcement regarding fatalities at KCC, 27/06/2019: glencore.com] & [Statement on FARC in Area around KCC, 04/07/2019: glencore.com] • Met: Stakeholder input to steps taken: According to the company's statements, it will "continue to engage with all the relevant stakeholders to collaborate on identifying and implementing a long-term, sustainable solution to illegal mining". [KCC 27 June Incident Fact Sheet, 08/07/2019: glencore.com] & [Letter to Voluntary Principles Secretariat, 04/07/2019: glencore.com]
E(4).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: Provided remedy: The company partners with the Fair Cobalt Alliance, an NGO aiming to positively transform ASM in the DRC. It is working towards eliminating child and forced labour, improving work practices in ASM operations and supporting alternative livelihoods to help increase incomes and reduce poverty. However, there is no remedy procedure found relating to this company. [Fair Cobalt Alliance, "Our Members": faircobaltalliance.org] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Area: Child labour, working hours, health & safety • Headline: Glencore accused of child labour in DRC • Story: On December 15, 2019, a legal complaint has been filed in US by human rights group Rights Advocates on behalf of 14 families from the Democratic Republic of Congo (DRC) against Tesla, Microsoft, Alphabet, Dell, and Apple. The lawsuit accused the companies of aiding and abetting in the death and serious injury of children who they claim were working in cobalt mines owned by Glencore. It alleged that the defendants have known for a "significant period of time" that Congo's mining sector "is dependent upon children." The claim further alleged that cobalt from the Glencore-owned mines was then sold to Umicore, which in turn then sells battery-grade cobalt to Apple, Google, Tesla, Microsoft, and Dell. [CNN, 18/12/2019, "Apple, Google, Microsoft, Dell and Tesla are sued over alleged child labor in Congo": cnn.com] [Reuters, 16/12/2019, "Tesla, Apple among firms accused of aiding child labor in Congo": reuters.com] [Sky News, 17/12/2019, "Tesla and Apple among tech giants accused of aiding child labour in DRC": news.sky.com] [Glencore statement on child labour allegations, 17/12/2019: glencore.com]
E(5).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: On December 17, 2019, Glencore issued a statement in response to the allegations levied against the company that it was using child labor. The company stated: "We [Glencore] do not tolerate any form of child, forced, or compulsory labour in our supply chain. We support and respect human rights in a manner consistent with the Universal Declaration of Human Rights." [Glencore statement on child labour allegations, 17/12/2019: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: Glencore's response to the allegations were comprehensive, fully detailing the nature of its operations in the DRC. The company explains that the lawsuit levied against the companies accused of child labor abuse references a number of concessions as locations of injury or fatalities, some of which, it explains, are erroneously claimed to be controlled and operated by KCC, Glencore's operation in the DRC. [Glencore statement on child labour allegations, 17/12/2019: glencore.com]
E(5).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: Engaged with stakeholders: There is no evidence that the company engaged with affected stakeholders to identify the root causes for child labour in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>artisanal mining. Engagement to find causes for artisanal mining alone are not sufficient. Even though the company engaged with stakeholders to highlight the dangers of artisanal mining, it did not investigate the reasons for children to be employed in these activities.</p> <p>The company provided feedback to CHRB on this indicator, however, both the company's statement and the report by responsible minerals initiative did not refer to the alleged rights violations. [Responsible Minerals Initiative, 13/07/2021, "Responsible Minerals Assurance Process Assessment Report": responsiblemineralsinitiative.org] [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The company did not present investigative results regarding the underlying issues of the events. <p>The company provided feedback to CHRB on this indicator, however, both the company's statement and the report by responsible minerals initiative did not refer to the alleged rights violations. [Responsible Minerals Initiative, 13/07/2021: responsiblemineralsinitiative.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The company has denied its involvement in the allegation by stating that it is not a defendant in the lawsuit filed in a US court by IRAdvocates on 15 December 2019 regarding child labour in the artisanal mining of cobalt in the Democratic Republic of Congo (DRC). However, the company claims that it works with its security providers to ensure they continue to uphold respect for human rights in a manner consistent with the Voluntary Principles on Security and Human Rights. <p>The company provided feedback to CHRB on this indicator, however, both the company's statement and the report by responsible minerals initiative did not refer to the alleged rights violations. [Responsible Minerals Initiative, 13/07/2021: responsiblemineralsinitiative.org] [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken: The company does not claim that any of the actions taken were informed by stakeholder input.
E(5).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: Provided remedy: The company provided feedback for this indicator, however, no specific evidence was found supporting the claims. • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company provided feedback for this indicator, however, no specific evidence was found supporting the claims. • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> • Area: Health & Safety <ul style="list-style-type: none"> • Headline: 11 indigenous communities affected by a Glencore project have high levels of toxic substances in their bodies, reveals Amnesty International report • Story: On 18 May, 2021, Amnesty International published a report containing detailed research and analysis of metals and toxic substances found in the bodies of 150 members of indigenous groups in Espinar, Peru. The research also found that 115 samples of water used for human consumption tested positive for total coliforms, which means that the water is not clean and safe. <p>Amnesty International found levels of metals and toxic substances (lead, cadmium, arsenic, mercury and manganese) in the study participants that highlight the health risk to which Indigenous communities in Espinar are exposed. Between five and 88 people had levels of each of the metals and toxic substances analysed higher than the reference values used in the study. In two people, tests revealed the presence of a metal and chemical substance significantly above the reference values used in the study and 14 people had levels of more than one metal and chemical that were equal to or higher than the reference values used in the study.</p> <p>The research was carried out among 11 Indigenous communities between 2018 and 2020 located in the areas directly affected by the Antapaccay Expansión Tintaya - Integración Corocchohuayco mining project, owned by the Anglo-Swiss transnational Glencore PLC.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Business and Human Rights Resource Centre, 23/05/2021, "Peru: 11 indigenous communities affected by a Glencore project have high levels of toxic substances in their bodies, reveals Amnesty International report": business-humanrights.org]</p> <p>[Amnesty International, 18/05/2021, "Peru: Evidence confirms indigenous communities in Espinar exposed to toxic metals pollution - new report": amnesty.org.uk] [Swissinfo, 12/07/2021, "Toxic metals studies add to frustrations surrounding Swiss-owned mine in Peru": swissinfo.ch] [Amnesty International, 18/05/2021, "Peru: Failed state of health: Health emer</p>
E(6).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: In response to the allegation, the company stated: "Antapaccay's operation area of influence includes the Cañipia and Salado Rivers. Both rivers have mineralised water due to the natural presence of minerals in the soil. This has been previously confirmed by the Peruvian authorities, among them the National Water Authority". [Swissinfo, 12/07/2021: swissinfo.ch] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: Glencore said in an emailed response that: "Antapaccay encourages efforts to improve access to water for Espinar's rural and urban communities through supporting initiatives that address water quantity and quality issues". However, the company fails to address the human rights violations that occurred. <p>In addition, the company provided feedback for this indicator. However, the document sent by the company is from 2016 and the allegation is from 2021. So, a statement considering a past study cannot be applicable from a situation that happened subsequently. [Swissinfo, 12/07/2021: swissinfo.ch] [CAFOD, 11/2016, "Leader or Laggart? Is the UK meeting its commitments on business and human Rights?": cafod.org.uk]</p>
E(6).2	The Company has appropriate policies in place	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: Engaged with stakeholders • Not Met: Identified cause: In its feedback to CHRB the company referenced information from the year 2012 and 2016, including a report by CAFOD from 2016. However, as the research that forms the basis of this allegation was conducted between 2018 and 2020 the additional information provided by the company does not change the assessment of this indicator. [CAFOD, 11/2016, "Leader or Laggart? Is the UK meeting its commitments on business and human Rights?": cafod.org.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: In its response to Swissinfo the company added it had invested in an irrigation system for agricultural production and hydraulic infrastructure to collect dam rainwater. "It is anticipated that ten different communities' agriculture and livestock activities will benefit from the dam," Glencore said. <p>However, this is no evidence that the company made changes to its operations or management system following the events and their human rights impacts.</p> <p>In its feedback to CHRB the company referenced information from the year 2012 and 2016, including a report by CAFOD from 2016. However, as the research that forms the basis of this allegation was conducted between 2018 and 2020 the additional information provided by the company does not change the assessment of this indicator. [Swissinfo, 12/07/2021: swissinfo.ch] [CAFOD, 11/2016: cafod.org.uk]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(6).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: Provided remedy: In its feedback to CHRB the company referenced information from the year 2012 and 2016, including a report by CAFOD from 2016. However, as the research that forms the basis of this allegation was conducted between 2018 and 2020 the additional information provided by the company does not change the assessment of this indicator. [CAFOD, 11/2016: cafod.org.uk] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: In its feedback to CHRB the company referenced information from the year 2012 and 2016, including a report by CAFOD from 2016. However, as the research that forms the basis of this allegation was conducted between 2018 and 2020 the additional information

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>provided by the company does not change the assessment of this indicator. [CAFOD, 11/2016: cafod.org.uk]</p> <ul style="list-style-type: none"> • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

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

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

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