

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Glencore
Sector Food and agricultural products (supply chain only) & Extractives
Overall score 31.6 out of 100

Theme score	Out of	For theme
4.5	10	A. Governance and Policy Commitments
8.2	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
6.2	25	D. Performance: Company Human Rights Practices
5.2	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 Policy Commitments (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, 01/06/2021: glencore.com] Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to 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, 13/07/2021: glencore.com] & [Human Rights Policy, 01/06/2021: glencore.com] Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on	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: Commitment to ILO core principles: The Company states in its Code of Conduct: 'We commit to the International Labour Organisation Declaration on

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Fundamental Principles and Rights at Work		<p>Fundamental Principles and Rights at Work' [Code of Conduct, 13/07/2021: glencore.com]</p> <ul style="list-style-type: none"> Met: Explicitly lists all four ILO core principles: The Company's Human Rights Policy explicitly commits it to respect all the ILO core labour rights. With respect to 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, 01/06/2021: glencore.com] & [Code of Conduct, 13/07/2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Expects suppliers to commit to ILO core principles: 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: Expects BPs/JVs to commit to ILO core principles: 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, 01/06/2021: glencore.com] Met: Explicitly lists all four ILO core principles 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: Explicitly lists all four ILO core principles 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, 01/06/2021: 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, 01/06/2023: glencore.com] Not Met: Commitment to ILO working hours standards or 48 hour regular work week <p>Score 2</p> <ul style="list-style-type: none"> Met: Expects suppliers to commit to H&S of workers: The Suppliers Code of Conduct 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'. For the purposes of this Supplier Code 'a supplier is any individual or organisation that provides, sells or leases materials, products or services directly to Glencore companies'. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] Met: Expects BPs/JVs to commit to H&S of 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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.'</p> <p>[Health and safety Policy, 01/06/2023: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Suppliers Code of Conduct indicates: 'We expect our suppliers to offer fair and transparent terms and conditions of employment including 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. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to respect land ownership/natural resources as in VGGT • Not Met: Commitment to respect land ownership/natural resources 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'. 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, 13/07/2021: glencore.com] • Met: Commitment to respect indigenous rights or ILO 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: Expects 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: Commitment to respect 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, 01/06/2023: glencore.com] & [Code of Conduct, 13/07/2021: glencore.com] • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Glencore Social Performance Policy indicates: '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 on Indigenous Peoples are likely to occur, including as a result of relocation, disturbance of lands and territories or of critical cultural heritage'. However, 'work to obtain' is not considered a formal statement of commitment according to CHRB wording criteria. Moreover, it is not clear this policy applies to the Company's agriculture subsidiary, Viterra, as it adds: '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'. [Social Performance Policy, 2021: glencore.com] • Not Met: Expects 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]

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A.1.3.b.AG	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to women's rights: The its Human Rights Policy states: '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. Glencore webpage section Communities indicates: 'Some people living in our host communities are at risk of economic and social discrimination. These may include Indigenous people, women, children, disabled and elderly people, and victims of conflict'. GLENCORE 2022 Voluntary Principles on Security and Human Rights Annual Report adds: 'We require our industrial assets to conduct threat and risk assessments and security vulnerability assessments based on the local security context. These assessments identify security-related threats, risks, and potential impacts to people (including women[...]) and our industrial assets'. However, no evidence found that the Company (Viterro) is explicitly committed to respect women's rights. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 01/06/2021: glencore.com] & [2022 Voluntary Principles on Security and Human Rights Annual Report GLENCORE, 2023: glencore.com] • Not Met: Commitment to children's rights: The Human Rights Policy states: 'We aim to: make a positive contribution to the advancement of human rights of all people, including vulnerable groups. [...]' 'We do not tolerate child labour [...]' and actively seek to identify and eliminate them from our supply chain'. However, although the Company states it prohibits child labour, no commitment to respect children's rights found. The Company has provided comments to CHRB regarding this subindicator, however, it was a Glencore [extractive sector] report, and this indicator analyses its agriculture sector. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 01/06/2021: glencore.com] • Not Met: Commitment to 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, 01/06/2021: glencore.com] • Not Met: Expects suppliers to respect at least one of these rights: The Company has provided comments to CHRB regarding this subindicator, however, it was the Glencore [extractive sector] Supplier Code of Conduct, and this indicator analyses its agriculture sector. No further evidence found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment refers to CEDAW/Women's Empowerment Principles • Not Met: Commitment refers to Child Rights Convention/Business Principles • Not Met: Commitment refers to Convention on migrant workers • Not Met: Expects suppliers to respect these rights
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	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: Commitment to respect land ownership/natural resources 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, 13/07/2021: glencore.com] • Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Human Rights Policy 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'. [Human Rights Policy, 01/06/2021: glencore.com] • Met: Expects EX BPs to make these commitments: The Human Rights Policy 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'. It also states: 'Where it is unavoidable, we follow International Finance Corporation Performance Standard 5, which seeks to minimise the impact through full participation of affected stakeholders and a focus on building long-term productive livelihoods in a manner conducive to their well-being and human rights'. The Policy also applies to contractors. [Human Rights Policy, 01/06/2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Human Rights Policy indicates: 'We work to obtain the free, prior and informed

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			<p>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'. However, 'work to obtain' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 01/06/2021: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect 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 explicit commitment to respect the right to water was found in a formal policy statement. The webpage section Water notes: 'We recognise access to water as a fundamental human right and strive to support equitable access to water through implementing sustainable water management systems at all our industrial assets'. However, 'recognise' is not considered a formal statement of commitment according to CHRB wording criteria, moreover, commitments are expected to be placed in Company policy documents. [Environmental Policy, 01/06/2023: glencore.com] & [Water_web, N/A: glencore.com] • Not Met: Expects EX BPs to make these commitments: The Company has provided comments to CHRB regarding this indicator noting its supplier expectations in found in its Responsible Sourcing Policy and Supplier Code of Conduct. However, it is not clear the Company expects extractive business partners to commit to respect the water to water and to respect ownership/use of land and natural resources also to include a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing.
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	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 Voluntary Principles on Security and HRs: The Company states in its Human Rights Policy: 'We support, implement and promote the Voluntary Principles on Security and Human Rights'. [Human Rights Policy, 01/06/2021: glencore.com] • Not Met: Commits to International Humanitarian Law <p>Score 2</p> <ul style="list-style-type: none"> • 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. The Company has provided comments to CHRB which were already in use. No further evidence found. [Human Rights Policy, 01/06/2021: 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: Commitment to remedy adverse HRs impacts: 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, 01/06/2021: glencore.com] • Met: Expects suppliers to make this commitment: The Suppliers Code of Conduct indicates: 'If suppliers cause or contribute to an adverse impact on human rights in their business activities and supply chain, we expect that they provide for, or cooperate in, processes to enable an appropriate remedy'. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Met: Expects EX BPs 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, 01/06/2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: 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. The Company has provided comments to CHRB regarding this indicator, however, no further evidence found. [Human Rights Policy, 01/06/2021: glencore.com] • Not Met: Commitment to work with suppliers on remedy: The Supplier Code of Conduct indicates: 'We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified potential or actual adverse impacts as appropriate'. However, no commitment found to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Not Met: Commitment to work with EX BPs on remedy: The Supplier Code of Conduct indicates: 'We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified potential or actual adverse impacts as appropriate'. However, no commitment found to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services. [Supplier Code of Conduct_GLENCORE, 06/2022: 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 of threats/attacks on 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, 01/06/2021: glencore.com] • Not Met: Expects suppliers to make this commitment • Not Met: Expects 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, 01/06/2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (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: The Human Rights Policy indicates: 'The Glencore Board, through its Health, Safety, Environment and Communities (HSEC) Committee oversees our human rights activities which are embedded across the business'. [Human Rights Policy, 01/06/2021: glencore.com] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
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: Process to review HRs strategy at board level: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>reporting to external stakeholders concerning HSEC matters; Reporting to the Board'. The Committee met five times. [Health, Safety, Environment and Communities Committee, N/A: glencore.com] & [2021 Annual Report - Glencore, 2022: glencore.com]</p> <ul style="list-style-type: none"> • Met: Example of HRs issues/trends discussed in last reporting period: The 2021 Annual Report discloses the 'main topics which were reviewed, discussed, and when required, approved during 2021'. It included: 'Fatalities, major incidents and other safety Issues, [...] HSEC and Human-Rights policy framework; Human Rights and Communities analysis; Supply chain traceability'. [2021 Annual Report - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board 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. [2021 Annual Report - Glencore, 2022: glencore.com]
A.2.3	Incentives and performance management	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: At least one board member incentive linked to HRs commitments: The scorecard for the annual bonus of the CEO includes Safety. It discloses a table which 'sets out the performance delivered against these non-financial performance categories'. It discloses information on its 2021 achievements on safety: 'Drove significant year-over-year improvements in all key health and safety indicators across the business; Positive multi-year trend with year-on-year improvement exceeding 10% for Lost Time Injury Frequency Rates (LTIFR) and Total Recordable Injury Frequency Rates (TRIFR); Decrease in number of fatalities, in line with multi-year trend, and a year-on-year improvement exceeding 45% for the Fatality Frequency Rate (FFR); Led the relaunch of the 'SafeWork' programme to identify and address underlying issues in safety performance and reinvigorate the safety culture across all operations. In 2021, all assets were assessed against the SafeWork framework. Identified gaps are captured in action plans, with regular status update reporting to the Board of Directors'. The CEO in a Board member. [2021 Annual Report - Glencore, 2022: glencore.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the CEO has an incentive for safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: See above. Safety represents 15% of the annual bonus. [2021 Annual Report - Glencore, 2022: glencore.com] • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	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 process to review business model and strategy for HRs risks: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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] & [2021 Annual Report - Glencore, 2022: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Describes frequency and triggers for reviewing business model: Regarding the Ethics, Compliance and Culture (ECC) Committee, the Glencore 2022 Annual Report indicates: 'The Committee met four times during the year'. As for assessing security impact, risks, and opportunities, the GLENCORE 2022 VPSHR Annual Report notes: 'We require our industrial assets to conduct threat and risk assessments and security vulnerability assessments based on the local security context. These assessments identify security-related threats, risks, and potential impacts to people (including women, children, Indigenous Peoples, and other vulnerable groups) and our industrial assets. Our industrial assets must integrate the findings into their business planning and review annually, at both industrial asset and commodity department levels. The security impacts, risks and opportunities are reviewed at a suitable frequency based on risk, and updated, if required, in response to changes in the industrial asset's area of influence and security context'. However, this subindicator looks for a evidence of the Board revising and deciding of its business model or strategy due potential impacts on human rights. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The webpage section Sustainability indicates: 'Oversight and ultimate responsibility for our Group sustainability strategy and frameworks well as its implementation across the Group rests with our senior management team'. The 2021 Annual Report indicates: 'The Environment, Social and Governance (ESG) committee, comprises Glencore's CEO, CFO, Head of Industrial Assets, General Counsel, Head of Compliance, Head of Human Resources, Head of HSEC and Human Rights, and Head of Sustainability'. The 2021 Ethics and Compliance Report adds the committee 'Reviews and approves Group policies, standards, procedures and practices to ensure they align with our Values and oversees their implementation'. [2021 Annual Report - Glencore, 2022: glencore.com] & [2021 Ethics and Compliance Report, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The webpage section Sustainability indicates: 'Our Group HSEC and human rights team provides detailed risk management guidance and our HSEC audit team audits catastrophic and fatal hazard management plans. They also sign off on the sustainability aspects of the Group risk management framework'. [Sustainability - Our Approach_web, N/A: glencore.com] • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in 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 linked to HRs commitments: The scorecard for the annual bonus of the CEO includes Safety. It discloses a table which 'sets out the performance delivered against these non-financial performance categories'. It discloses information on its 2021 achievements on safety: 'Drove significant year-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>over-year improvements in all key health and safety indicators across the business; Positive multi-year trend with year-on-year improvement exceeding 10% for Lost Time Injury Frequency Rates (LTIFR) and Total Recordable Injury Frequency Rates (TRIFR); Decrease in number of fatalities, in line with multi-year trend, and a year-on-year improvement exceeding 45% for the Fatality Frequency Rate (FFR); Led the relaunch of the 'SafeWork' programme to identify and address underlying issues in safety performance and reinvigorate the safety culture across all operations. In 2021, all assets were assessed against the SafeWork framework. Identified gaps are captured in action plans, with regular status update reporting to the Board of Directors'. However, it is not clear other senior manager also receives a similar incentive. Incentive for the CEO was already assessed in A.2.3 [2021 Annual Report - Glencore, 2022: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the CEO has an incentive for safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: See above. Safety represents 15% of the annual bonus. However, evidence seems to refer only to the CEO, which was already assessed in A.2.3. [2021 Annual Report - Glencore, 2022: glencore.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
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: HRs risks 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_web, N/A: glencore.com] • Met: Provides an example: The 2021 Annual Report indicates: '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'. [2021 Annual Report - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The Company has provided comments to CHRB regarding this indicator on its internal audit programme, which assesses the adequacy and effectiveness of our industrial assets' security management plans. However, this indicator looks for a description of how it assesses the adequacy of the enterprise risk management system in managing human rights during the Company's last reporting year. The assessment should have been either overseen by the Board Audit Committee or conducted by an independent third party. [2022 Voluntary Principles on Security and Human Rights Annual Report GLENCORE, 2023: glencore.com]
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 HRs policies 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 2021 Modern Slavery Statement: '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'. [Human Rights Policy, 01/06/2021: glencore.com] & [2021 Modern Slavery Statement - GLENCORE, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Describes steps to communicate HRs policies to supply chain: The Responsible Sourcing Policy indicates: 'We communicate our requirements and expectations to all suppliers. Using a risk-based approach we conduct training for certain suppliers'. However, this subindicator looks for a description of the steps it takes to communicate its human rights policy down its supply chain itself. Moreover, this is a Glencore document [extractive sector], it is not clear it applies to the agriculture sector. No further evidence found. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Describes steps to communicate HRs policies to EX BPs: The Responsible Sourcing Policy indicates: 'We communicate our requirements and expectations to all suppliers. Using a risk-based approach we conduct training for certain suppliers'. However, this subindicator looks for a description of the steps it takes to communicate policy requirements to extractive business partners. No further evidence found. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Requires suppliers to communicate HRs policies: The 2021 Modern Slavery Statement indicates: 'We communicate our requirements and expectations to relevant suppliers'. The Supplier Code of Conduct states: 'We require our suppliers, when working with Glencore, to act in a manner consistent with this Supplier Code of Conduct. Additionally, we encourage our suppliers to set expectations for their own suppliers that align with this Supplier Code of Conduct'. It adds: 'Our procurement strategies are developed locally to reflect the diverse environments in which we operate. We work with local suppliers in the context of these procurement strategies to communicate our expectations and build understanding of our requirements'. However, it is not clear how Viterra communicates its Human Rights policy to all of its suppliers, as it specifies 'relevant suppliers' and 'procurement strategies'. Finally, '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. The Responsible Sourcing Policy indicates: 'We communicate our requirements and expectations to all suppliers. Using a risk-based approach we conduct training for certain suppliers'. However, this subindicator looks for evidence that the Company requires cascading the requirements down its supply chain. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] & [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how HRs policies are contractual/binding for suppliers: The Supplier Code of Conduct indicates: '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 responsible sourcing'. However, no binding commitment to respect other human rights, such as freedom of association and collective bargaining was found. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs
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: Score of at least 1 on A.1.2.a: See A.1.2.a • Met: Describes how workers are trained on HRs 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 2021 Modern Slavery Statement: 'We conduct training for our employees and relevant contractors under our direct supervision to ensure that they understand the behaviour expected of them and provide them with guidance on the elements of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 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, including modern slavery’. [Human Rights Policy, 01/06/2021: glencore.com] & [2021 Modern Slavery Statement - GLENCORE, 2022: glencore.com]</p> <ul style="list-style-type: none"> • Met: Trains relevant managers including procurement on HRs: 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, 01/06/2021: glencore.com] • Met: Trains relevant managers including security on HRs: 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. The 2021 Sustainability Report indicates: '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'. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [Human Rights Policy, 01/06/2021: 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 HRs commitments • Not Met: Trains BPs to meet HRs commitments: The 2021 Modern Slavery Statement states: 'Using a risk-based approach we conduct training for suppliers identified as being high risk'. However, no evidence found of general human rights training (policy commitments) conducted for extractive business partners. The Responsible Sourcing Policy states: 'We train our employees and contractors who are involved in procurement, purchasing, sales, trading, contracting, contract management and other relevant functions, on our supplier risk management framework'. However, this indicator looks for a description of the training it provides to business partners to help them meet its human rights policy commitments. [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com] & [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Discloses % suppliers 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: Score of at least 1 on A.1.2.a: See A.1.2.a • Met: Monitors implementation of HRs 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 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>(ii) give us the right to monitor and audit this compliance'. [Annual Report 2020, 2021: glencore.com] & [MS Statement 2020 Glencore, 2021: glencore.com]</p> <ul style="list-style-type: none"> • Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: See above. The 2021 Modern Slavery Statement indicates: 'We require each of our industrial assets to undertake an annual self-assessment on their implementation of our Group HSEC& Human Rights (HSEC&HR) expectations. These self-assessments are reviewed by both the corporate HSEC-HR team and the internal audit function. Our HSEC assurance for industrial assets processes includes an assessment of human rights risk, including modern slavery risks, within our organisation'. The webpage section Sustainability Our Approach notes: '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'. Glencore 2022 Annual Report notes that some of the responsibilities of the Health, Safety, Environment & Communities (HSEC) Committee include: 'Policy and standards: [...] Monitoring the implementation of the Group HSEC&HUMAN RIGHTS standards specifically those that were developed and/or updated and rolled out in September 2021'. The Responsible Sourcing Policy adds: 'We implement assurance processes to monitor compliance with our supplier risk management framework'. The webpage section Responsible Sourcing and Supply notes: 'Our Supplier Code of Conduct apply to any individual, organisation or company that provides, sells or leases materials directly to Glencore companies, including goods and services. The Standards form the base of our robust risk-based supply chain due diligence (SCDD) programme [...]. Our SCDD for minerals and metals volumes seeks to confirm that our suppliers operate in accordance with our Supplier Code of Conduct, as well as to confirm our suppliers do not knowingly tolerate, contribute to or profit from any of the OECD DDG ANNEX II risks'. [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com] & [Responsible Sourcing and Supply_web] • Not Met: Discloses % of supply chain monitored • Not Met: Discloses % of EX BP's monitored: The 2021 Sustainability Report indicates the 'Percentage of new suppliers that were screened using social criteria' in 2021: 66%. However, it is not clear the total percentage of suppliers, including extractive business partners screened, since evidence seems to refer exclusively to new ones. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Not Met: Describes 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 actions process: The Supplier Code of Conduct indicates: 'Where we find instances of noncompliance by our suppliers with the requirements of our Supplier Code of Conduct, we investigate these incidents to understand causes and contributing factors, and we take appropriate action accordingly. Our suppliers are required to cooperate in the investigation and assessment of potential or actual adverse impacts and provide Glencore access to relevant information on reasonable request'. The Responsible Sourcing Policy states: 'We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate'. The Glencore 2021 Sustainability Report provides examples of recommendations as a result of a Voluntary Principles assessment in different regions. However, no description of steps of the corrective action process found. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] & [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Discloses findings and number of correction action processes: The Company has provided comments to CHRB regarding this indicator in which it discloses the results of a Voluntary Principles assessment in different regions. However, no further evidence found the findings of its human rights monitoring process and number of corrective action processes as a result of the monitoring. [2021 Sustainability Report - Glencore, 2022: glencore.com]
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: HRs performance affects selection suppliers: Viterra's' MSA 2020 (Glencore's agriculture division) 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to doing business). The Responsible Sourcing Policy indicates: ‘We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate. However, where we find that a supplier cannot or will not take actions to demonstrate compliance within an agreed timeframe, we may review our continuing relationship with that supplier, up to and including termination of engagement’. Nevertheless, it is not clear how the screening process human rights results affect the selection of suppliers. Moreover, the Social Performance Policy is a Glencore document [extractive sector], it is not clear it applies to the agriculture sector. [Viterra - MS 2020, 2021: viterra.com] & [Responsible Sourcing Policy, 01/06/2022: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: HRs performance affects selection EX BPs: The webpage section Suppliers indicates: ‘We may ask suppliers to complete the due diligence questionnaire during pre-qualification, the tendering process, periodically throughout the duration of an engagement with us and/or at the renewal of an existing contract’. The Responsible Sourcing Policy states: ‘We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate. However, where we find that a supplier cannot or will not take actions to demonstrate compliance within an agreed timeframe, we may review our continuing relationship with that supplier, up to and including termination of engagement’. However, it is not clear how human rights performance is taken into account in the identification of potential business relationships, including extractive business partners. [Suppliers_web, N/A: glencore.com] & [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Met: HRs performance affects continuation supplier relationships: Viterra's' Code of Conduct 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. The Company has provided additional comments to this subindicator, but it was already in use. [Viterra - Code of Conduct, N/A: viterra.com] & [Viterra - Human Rights Policy, N/A: viterra.com] • Met: HRs performance affects ongoing BPs relationships: The Supplier Code of Conduct indicates: ‘where we find that a supplier cannot or will not take actions to demonstrate compliance [with the Supplier Code of Conduct] within an agreed timeframe, we may review our continuing relationship with that supplier up to and including termination of engagement’. The Supplier Code contains the Company’s Human Rights expectations. The Company has provided additional comments to this subindicator, but it was already in use. [Code of Conduct, 13/07/2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with suppliers to meet HRs requirements: The Responsible Sourcing Policy indicates: ‘We strive to make a contribution to communities wherever we operate by providing employment opportunities and supporting local businesses. Our procurement strategies are developed locally to reflect the diverse environments in which we operate. We work with local suppliers in the context of these procurement strategies to communicate our expectations and build understanding of our requirements’. However, no further description found of how it supports business relationships, including suppliers, in meeting the Company's requirements. Moreover, the Social Performance Policy is a Glencore document [extractive sector], it is not clear it applies to the agriculture sector. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Works with EX BPs to meet HRs requirements: The Responsible Sourcing Policy indicates: ‘We strive to make a contribution to communities wherever we operate by providing employment opportunities and supporting local businesses. Our procurement strategies are developed locally to reflect the diverse environments in which we operate. We work with local suppliers in the context of these procurement strategies to communicate our expectations and build understanding of our requirements’. However, no further description found of how it supports business relationships, including suppliers, in meeting the Company's requirements. [Responsible Sourcing Policy, 01/06/2022: glencore.com]
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how workers and communities identified and engaged in the last two years: The 2021 Sustainability Report indicates: ‘Our stakeholders include our workforce, shareholders, suppliers, joint ventures, customers, governments and regulators, local communities, traditional authorities, nongovernmental

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>organisations, labour unions, civil society, media, and industry peers'. It then discloses information on the engagement with each stakeholder group'. The 2021 Annual Report discloses 'How the Group maintains engagement' with each group. The Social Performance Policy indicates: 'We implement a range of engagement activities designed to be relevant and appropriate for different stakeholders, including vulnerable groups'. The 2022 Annual Report expands on the Company's stakeholders engagement, including information on stakeholder groups, how the Company interacts with them and how the Board considers their interests and opinions during its discussions and decision-making processes. It includes communities and suppliers. However, it is not clear how it has identified affected stakeholders, including local communities or workers in its supply chain, in the last two years. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [2022 Annual Report GLENCORE, 2023: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders whose HRs may be affected • Met: Provides two examples of engagement with stakeholders: The 2021 Modern Slavery Statement indicates: 'Through our human rights rating tool, KCC and MUMI strengthened their evaluation of their site-specific risks, including those relating to modern slavery. The findings have, in turn, shaped the various elements of the HRIA/DD. The project is being implemented in three phases over the course of 2022'. Phase 2 applies internal and external stakeholder engagement: 'The external engagement comprises comprehensive in-field consultation with affected parties, vulnerable persons and other stakeholders'. <p>In its 2020 sustainability report, the Company states that "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. [...] plan. 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. At Zonnebloem, all of the families have relocated as part of the first phase. Planning for the life of mine indicates that one additional family will need relocating by 2027. This family has requested a rural relocation and Zonnebloem is currently investigating possible site options. Engagements are ongoing with the two affected families at iMpunzi. The two families have asked for an urban relocation and iMpunzi is identifying suitable alternate accommodation. The families have viewed several options and we anticipate a decision shortly.' The Company has provided additional comments to this subindicator. [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com] & [Building for the future. Sustainability Report 2020, N/A: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: It indicates key topics discussed with workforce and labour unions in 2021: 'Covid-19; Health, safety, and wellbeing; Training, compensation, and career opportunities; Company culture and reputation; Negotiations of workplace agreements; Industrial relations and potential site closures'. However, although the Company indicates the topics discussed, no summary analysis found of the input/views given by stakeholders on human rights issues. Glencore 2021 Sustainability Report explains the MRM [McArthur River Mine – a subsidiary] engagement with Indigenous Peoples in Australia. It adds: 'In April 2021, MRM announced that it had started discussions with the Northern Land Council and Traditional Owners to negotiate an Indigenous Land Use Agreement in relation to MRM and the Bing Bong Loading Facility. The process will involve broad consultation with Traditional Owners on a variety of matters, including Sacred Sites and cultural heritage protection'. Glencore 2021 Sustainability Report discloses a case study of a third-party human rights impact assessment (HRIA) process undertaken in DRC: 'The team involved in the process have undertaken [...] site visits to both KCC and MUMI, run workshops with internal stakeholders and engaged with external stakeholders in the DRC. These included 'rights holders', such as workers and communities, as well as representatives of vulnerable groups and 'duty bearers', including site management, contractor management, community leaders, and local government representatives'. No summary analysis of the input/views given by stakeholders on human rights issues found. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [2022 Sustainability Report GLENCORE, 2023: glencore.com] • Not Met: Describes how stakeholders views influenced company's HRs approach: Glencore 2021 Sustainability Report explains the MRM [McArthur River Mine – a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			subsidiary] engagement with Indigenous Peoples in Australia. Glencore 2021 Sustainability Report discloses details the engagement of its Aurukun Bauxite Project Joint Venture in Queensland with the Wik and Wik Waya People who hold native title rights and Aboriginal freehold rights over much of the project area of the Aurukun Bauxite Project. However, it is not clear how the views from these different engagement processes have influenced the development or monitoring of its human rights approach. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [2022 Sustainability Report GLENCORE, 2023: glencore.com]

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: Describes process of 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'. The webpage section Human Rights notes: 'Our salient risks assessment considers risks to people'. [Sustainability Report 2020, 2021: glencore.com] & [Human Rights_web, N/A: glencore.com] • Met: Describes process for identifying risks in 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'. The 2021 Modern Slavery Statement adds: 'We use a suite of tools to assess and understand the modern slavery risks within our industrial assets, marketing activities and supply chains'. [Human Rights Policy, 01/06/2021: glencore.com] & [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Met: Describes process for identifying risks in EX BPs: See above [Sustainability Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes global risk identification system incl. stakeholder consultation: 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'. 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'. Similar evidence is found in the 2021 Modern Slavery Statement. [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"> • Not Met: Describes how risk identification system is triggered by new circumstances: The Enterprise Risk Management Policy indicates: 'We regularly review our risks and assess emerging issues, internal and external, which could manifest as material events. We monitor the effectiveness of risk management activities and controls. We proactively consult with relevant internal and external stakeholders on risks and their management'. However, this subindicator focuses in human rights and the event triggering the process rather than being a periodic task. The Responsible Sourcing Policy notes: 'We implement assurance processes to monitor compliance with our supplier risk management framework'. This seems to be part of its compliance monitoring system. This subindicator looks for a description of how a human rights due diligence process is triggered by new country operations, relationships, new human rights challenges or conflict affecting particular locations. No further evidence found. [Enterprise Risk Management Policy, 06/2021: glencore.com] & [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Describes risks identified in relation to new circumstances: The Company has provided comments to CHRB regarding this indicator on its compliance monitoring process. However, this indicator looks for a description of their risks identified when its global system to identify human rights risks is triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. No further evidence found. [Responsible Sourcing Policy, 01/06/2022: glencore.com]
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks: The 2021 Modern Slavery Statement indicates: 'In 2020, we developed an innovative human rights rating tool to enable the consistent and systematic assessment of the human rights risk level across our global industrial asset portfolio. 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 industrial assets'. [2021 Modern Slavery Statement - GLENCORE, 2022: glencore.com] • Not Met: Describes how process applies to supply chain: The Responsible Sourcing Policy indicates: '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 assess suppliers based on their risk and direct them to the most appropriate due diligence and management process for their risk level. [...] Our due diligence processes address supplier risks associated with legal compliance, abuse of human rights such as equality, non-discrimination and diversity, respect for workers' rights of freedom of association, modern slavery, child labour, health and safety, environmental impacts, and where applicable, risks associated with Annex II of the OECD Guidance. 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'. However, this subindicator looks for evidence of how the Company assesses which are the issues that are salient in its supply chain rather than identifying specific suppliers that have risk. It's not clear if the Company consolidates individual assessments so it can determine what are the issues that as a company, faces in its supply chain and require focused action plans. In addition, it is not clear how geographical, economic, social and other factors are factored in determining saliency. Moreover, the Responsible Sourcing Policy is a Glencore document [extractive sector], it is not clear it applies to the agriculture sector. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Describes how process applies to EX BPs: The Responsible Sourcing Policy indicates: '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 assess suppliers based on their risk and direct them to the most appropriate due diligence and management process for their risk level. [...] Our due diligence processes address supplier risks associated with legal compliance, abuse of human rights such as equality, non-discrimination and diversity, respect for workers' rights of freedom of association, modern slavery, child labour, health and safety, environmental impacts, and where applicable, risks associated with Annex II of the OECD Guidance. We use a variety of tools to assist us in our due diligence processes, which may include: on-site inspections, third party verification,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>obtaining information from third party sources including authorities, international organisations and civil society, and consulting experts and technical literature'. However, this subindicator looks for evidence of how the Company assesses which are the issues that are salient in its supply chain rather than identifying specific suppliers that have risk. It's not clear if the Company consolidates individual assessments so it can determine what are the issues that a company, faces in its supply chain and require focused action plans. In addition, it is not clear how geographical, economic, social and other factors are factored in determining saliency [Responsible Sourcing Policy, 01/06/2022: glencore.com]</p> <ul style="list-style-type: none"> • Met: Public disclosure of results of HRs risk assessment: The 2021 Modern Slavery Statement indicates its salient risks: '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: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: 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: Describes how global system applies to supply chain: The Responsible Sourcing Policy indicates: 'We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate'. Regarding 'to instances of non-compliance by our suppliers of metals and minerals with the risks identified in Annex II of the OECD Guidance, we comply with the mitigation and termination requirements defined in Annex II of the OECD Guidance'. However, this indicator looks for system to mitigate specific risks and impacts identified as a result of due diligence, rather than compliance audits followed by corrective plans for breaches found. As for security forces it explains: 'Where we identify that a reasonable risk exists, we will immediately devise, adopt and implement a risk management plan with suppliers to prevent or mitigate the risk of direct or indirect support to public or private security forces engaged in the abuses identified above. In such cases, we will suspend or discontinue engagement with suppliers of metals and minerals after failed attempts at mitigation within six months from the adoption of the risk management plan'. However, no description found of its global system to prevent, mitigate and remediate its salient human rights issues within its business partners beyond private security forces issues. Moreover, the Responsible Sourcing Policy is a Glencore document [extractive sector], it is not clear it applies to the agriculture sector. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Describes how global system applies to EX BPs: The Responsible Sourcing Policy indicates: 'We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate'. Regarding 'to instances of non-compliance by our suppliers of metals and minerals with the risks identified in Annex II of the OECD Guidance, we comply with the mitigation and termination requirements defined in Annex II of the OECD Guidance'. However, this indicator looks for system to mitigate specific risks and impacts identified as a result of due diligence, rather than compliance audits followed by corrective plans for breaches found. As for security forces it explains: 'Where we identify that a reasonable risk exists, we will immediately devise, adopt and implement a risk management plan with suppliers to prevent or mitigate the risk of direct or indirect support to public or private security forces engaged in the abuses identified above. In such cases, we will suspend or discontinue engagement with suppliers of metals and minerals after failed attempts at mitigation within six months from the adoption of the risk management plan'. However, no description found of its global system to prevent, mitigate and remediate its salient human rights issues within its business partners beyond private security forces issues. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Example of actions decided on at least 1 salient HRs issue: The 2021 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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. However, no example found of the specific actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations in the last three years. Previous assessment was partially based on the 2018 Human Rights Report which is considered outdated according to the CHRB three-reporting-year timeframe policy. [2021 Sustainability Report - Glencore, 2022: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
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: Describes system for evaluation effectiveness of actions: The 2021 Sustainability Report indicates: 'The HSEC audit team's programme evaluates the effectiveness of our sustainability risk identification, assessment and management. Every three years an independent third-party reviews the programme'. However, no description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions: 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 section of the Benchmark. This subindicator looks for evidence of lessons learnt in relation to specific salient issues. [2021 Sustainability Report - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
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: '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.' Also, '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,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employees and union members, suppliers and contractors and other stakeholders, to understand better their human rights perceptions and priorities. [...] Strengthening its complaints and grievances mechanism with continuous reports and satisfaction surveys'. 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.</p> <p>The Glencore 2022 Sustainability Report discloses information on the case study 'Identifying human rights risks and impacts': During 2022, the analysis was finalised and communication to stakeholders initiated, through meetings held with local communities to present results and obtain feedback. In 2023, Cerrejón will finalise these socialisations with other stakeholders and define improvements plans'. Glencore 2021 Sustainability Report explains the case study 'Respecting cultural heritage', in which the subsidiary MRM, in 2021, announced that 'it had started discussions with the Northern Land Council and Traditional Owners to negotiate an Indigenous Land Use Agreement in relation to MRM and the Bing Bong Loading Facility. The process will involve broad consultation with Traditional Owners on a variety of matters, including Sacred Sites and cultural heritage protection'. However, this subindicator looks for evidence of how the Company has responded, in terms of communication, to specific concerns raised in relation to a particular issue. It is not clear how it ensures meaningful information reaching affected stakeholders: how it responds, in communication terms, to issues raised by stakeholders, and about their access to those communications, beyond reports as they are not accessible for most affected stakeholders. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [2022 Sustainability Report GLENCORE, 2023: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes 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 mechanism(s) for 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: Grievance mechanism 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, 13/07/2021: glencore.com] & [Viterra - Code of Conduct, N/A: viterra.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made 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, 2021 Modern Slavery Statement notes: 'New joiners receive training 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 under our direct supervision 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] & [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes how workers in supply chain access grievance mechanism: The Viterra Supplier Code of Conduct indicates: 'We encourage our suppliers to ensure their workforce and associated communities have access to grievance mechanisms to confidentially raise any concerns without fear of retaliation'. However, it is not clear if suppliers' employees have access to file complaints in relation to suppliers' behaviour as it indicates it 'encourages' suppliers to do it. It could be either by using the Company's own mechanism or the Company expects its suppliers to establish a mechanism for their workers to raise such complaints or concerns. [Viterra Supplier Code of Conduct, N/A: viterra.com] • Met: Describes how workers in EX BPs access grievance mechanism: The Supplier Code of Conduct indicates: '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'. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Not Met: Expects suppliers to convey expectation to their suppliers • Not Met: Expects EX BPs to convey expectation to their BPs: See above. Although the Company expects extractive business partners to have a grievance channel open to their workers, it is not clear it expects extractive business partners to cascade this expectation down their supply chain as extractive business partners are only encouraged to do it [see B.1.4.b]. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com]
C.2	Grievance mechanism(s) for 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 accessible to all external individuals and communities: 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, the 2021 Modern Slavery Statement indicates: 'The Raising Concerns Programme allows whistleblowers to raise concerns anonymously in any of 15 languages, by internet or phone'. 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, 01/06/2021: glencore.com] & [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: 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, the 2021 Glencore Modern Slavery Statement indicates: '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. The Glencore Supplier Code of Conduct indicates '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'. However, no further information describing how Glencore or Viterra proactively ensure that all affected external stakeholders at their own operations are aware of it. [2021 Modern Slavery Statement -GLENCORE, 2022: glencore.com] & [Viterra - MS 2020, 2021: viterra.com] • Met: Describes how external individuals/communities access grievance mechanism: In its website section 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'. 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: Describes how external individuals/communities access grievance mechanism: In its website section 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: Expects supplier to convey expectation to their suppliers: The Company has provided additional comments to this subindicator, however, it was a document from Glencore (extractive sector) and this subindicator assesses is agriculture sector. • Not Met: Expects EX BPs to convey expectation to their BPs: The Glencore Supplier Code of Conduct indicates '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'. However, it is not clear the Company expects extractive business partners to convey expectations [to have a channel from which external individuals and communities can access to raise Complaints or concerns about human rights issues at the Company's suppliers] on access to grievance mechanism(s) to their suppliers. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com]
C.3	Users are involved in the design and performance of the 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: Describes how users engaged on design and performance: 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. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Not Met: Provides user engagement examples (at least two) on design and performance: Glencore 2021 Sustainability Report indicates: 'During 2021, Antapaccay [a copper asset in Peru] undertook actions that visibly demonstrate its respect for human rights. These included: [...] Strengthening its complaints and grievances mechanism with continuous reports and satisfaction surveys'. The Company has also provided in its feedback to CHRB another case study about impact assessment (HRIA) in Cerrejón, Colombia [Glencore 2022 Sustainability Report]. However, it is not clear that in Cerrejón, the Company engaged with potential or actual users on in the design, implementation or performance of the mechanism. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [2022 Sustainability Report GLENCORE, 2023: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of 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 examples (at least two) on improvement
C.4	Procedures related to the mechanism(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: Describes procedure and timescales for managing complaints or concerns: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>receive updates from Glencore and/or requests for further information to clarify the concern.' Moreover, the Company states in its Whistleblowing Policy: 'Glencore aims to complete the handling and/ or investigation of protected concerns in a timely manner. However, circumstances such as the complexity of the protected concern, competing priorities and other compelling reasons may justify an extended period for the completion of the handling and/or investigation of the protected concern. [...] The team handling and/or investigating the protected concern may determine the appropriate time to inform the individual(s) who are the subject of the protected concern'. However, it is not clear what are the timescales, even if estimated time-frames. The Company has provided additional comments to this subindicator, however, no further evidence found. [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org] & [Whistleblowing Policy, 01/06/2021: glencore.com]</p> <ul style="list-style-type: none"> • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The Company has provided additional comments to this subindicator, however, no further evidence found. • Not Met: Describes escalation to senior levels / independent adjudicators: 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'. The 2022 Annual Report explaining the role of the Board of Directors in overseeing and assessing its ethics and compliance, and ensuring policies, practices and behaviour are consistent with the Company's values: 'The Board separately receives quarterly updates on whistleblowing and investigation processes, and material investigations'. 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 may be escalated to more senior levels or independent third-party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [Whistleblowing Policy, 01/06/2021: 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 against workers/stakeholders: 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, 13/07/2021: glencore.com] • Met: Describes 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 Supplier Code of Conduct notes: 'If a concern remains unresolved or a reporter feels uncomfortable using these local channels, the Glencore Raising Concerns Programme offers anonymous reporting channels for all Glencore employees, contractors, suppliers, business partners and other stakeholders'. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] & [Raising concerns - FAQ, N/A: glencore.raisingconcerns.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • 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_GLENCORE, 06/2022: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct states: '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'. As indicated in previous indicators, the Company opens its own mechanisms for stakeholders. [Supplier Code of Conduct_GLENCORE, 06/2022: 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 legal 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, 01/06/2021: glencore.com] Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> Met: Example of issue resolved (if applicable): The 2021 Sustainability Report indicates: 'In 2020, three human rights organisations lodged a complaint with the UK's National Contact Point (NCP) for the Organisation for Economic Co-operation and Development (OECD), in relation to alleged breaches of the OECD Guidelines for Multinational Enterprises by Glencore UK Ltd., (GUK), in connection with certain events at the Badila oilfield in the Republic of Chad (the Complaint). GUK participated in the UK NCP's initial assessment of the Complaint and, on 8 February 2021, GUK notified the UK NCP of its decision to accept the NCP's offer to facilitate a mediation process with the three organisations. In June 2021, the UK NCP agreed to suspend the NCP proceedings (including the mediation process) until parallel legal proceedings were completed. In October 2021, the claimants under the parallel legal proceedings agreed not to proceed with service of the claim on GUK. However, potential other claims covering the same subject matter meant GUK chose not to continue in the mediation process with the three organisations. GUK expects the UK NCP to now proceed to a further examination of the complaint, before producing its Final Statement later this year'. [2021 Sustainability Report - Glencore, 2022: glencore.com]
C.7	Remedying adverse 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: Describes approach taken to remedy adverse HRs impacts: The 2021 Sustainability Report indicates: 'In 2021, our South African coal business successfully relocated the remaining household from its Goedevonden operation, and two households from its Impunzi operation. At Zonnebloem, an additional family will need to be relocated by 2031, in line with the amended life of mine plan. This family has recently expressed a desire for an urban relocation and has requested the operation to consider an earlier relocation, to which the operation has agreed. The operation is in the process of commissioning the compilation of a relocation action plan'. [2021 Sustainability Report - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided additional comments to this subindicator, indicating that there were no adverse human rights impacts between 2020 – 2022. In this case, the Company can describe the approach it would take to review and change systems, processes or practices to prevent similar adverse impacts in the future as required per last subindicator. Not Met: Describes approach to monitoring/implementing agreed remedy: The Company has provided additional comments to this subindicator, indicating that there were no adverse human rights impacts between 2020 – 2022. Not Met: Describes approach to learning from incidents if no adverse impacts identified: The Social Performance Policy indicates: 'We consult and consider the views of interested and affected parties in decisions that may affect them. We also actively engage in issues of importance to society through multistakeholder activities at a local, national and international level. We encourage and welcome feedback. We implement processes for stakeholders to raise concerns and complaints. We record and investigate all concerns and complaints and seek to resolve them in a timely manner. We investigate social incidents to understand causes and contributing factors and take remedial actions to avoid them being repeated. We implement assurance processes in alignment with the ICMM Mining Principles and monitor and communicate our social performance to host communities and broader society'. However, this subindicator looks for a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			description the approach it would take to review and change systems, processes or practices [in the light of adverse impacts] to prevent similar adverse impacts in the future. [Social Performance Policy, 2021: glencore.com]
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: Discloses number of grievances filed, addressed or resolved and outcomes 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: viterra.com] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes process to evaluate mechanism and changes made as a 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. ' [2021 Sustainability Report - 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 Food and 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: Requirements on living wage in supplier codes and 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: viterra.com] & [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: 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: Describes practices to avoid price or short notice requirements that undermine HRs: 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: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 including manufacturing sites <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined • Not Met: Discloses direct or indirect suppliers 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: Requirements on child labour in supplier codes and contracts: Viterra indicates in its Supplier Code of Conduct: 'have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per ILO standards'. The Company has provided additional comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra has its own Supplier Code. This subindicator looks not only for a prohibition of child labour but explicit requirementt to verifying age of job applicants and having remediation programs designed in case child labour is found. [Supplier Code of Conduct_VITERRA, N/A: viterra.com] • Not Met: Describes work with suppliers on eliminating child labour: The Glencore Responsible Sourcing Policy indicates the Company has a framework for managing suppliers: '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 collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate'. However, this indicator looks for a description of specific work done with business partners to eliminate child labour and to improve working conditions for young workers where relevant. Moreover, the Responsible Sourcing Policy is a Glencore document [extractive sector], it is not clear it applies to the agriculture sector, which is assessed by this subindicator. [Responsible Sourcing Policy, 01/06/2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain: The Company has provided additional comments to this subindicator explaining its framework for managing suppliers. However, this subindicator looks for an assessment of the number affected by (scope of) child labour in its supply chain. No further evidence found. [Responsible Sourcing Policy, 01/06/2022: glencore.com] • Not Met: Analysis of trends demonstrating progress
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: Requirements on debt/fees in supplier codes and contracts: The Company has provided comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra [segment of the agriculture sector] has its own Supplier Code. Viterra Supplier Code of Conduct states: 'have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per ILO standards'. The Company has also provided additional comments from Glencore 2021 Modern Slavery St, however, Viterra has its own MSS, which notes: 'We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour'. However, this subindicator looks for evidence of a contractual arrangement or supplier code of conduct requirement prohibiting suppliers and any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs. [2022 Modern Slavery St VITERRA, 2023: viterra.com] & [Supplier Code of Conduct_VITERRA, N/A: viterra.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on debt/fees for job seekers/workers: The Company has provided additional comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra [segment of the agriculture sector] has its own Supplier Code. Viterra Supplier Code of Conduct states: ‘have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per ILO standards’. The Company has also provided additional comments from Glencore 2021 Modern Slavery St, however, Viterra has its own MSS, which notes: ‘We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour’. However, this subindicator looks for a description of how it works with business partners to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. No further evidence found. [Supplier Code of Conduct_VITERRA, N/A: viterra.com] & [2022 Modern Slavery St VITERRA, 2023: viterra.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on paying in full and on time in supplier codes and contracts: The Company has provided comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra [segment of the agriculture sector] has its own Supplier Code. Viterra Supplier Code of Conduct states: ‘have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per ILO standards. [...] We expect our suppliers to: [...] pay at least minimum wage and fair remuneration, and offer fair working hours and conditions’. The Company has also provided additional comments from Glencore 2021 Modern Slavery St, however, Viterra has its own MSS, which notes: ‘We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour’. However, no evidence found that suppliers are required [contractually or through its supplier code] to pay in full and on time. [2022 Modern Slavery St VITERRA, 2023: viterra.com] & [Supplier Code of Conduct_VITERRA, N/A: viterra.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: 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: Requirements on free movement in supplier codes and contracts: The Company has provided comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra [segment of the agriculture sector] has its own Supplier Code. Viterra Supplier Code of Conduct states: ‘have zero tolerance for any form of modern slavery, including forced, compulsory or child labour as per ILO standards’. The Company has also provided additional comments from Glencore 2021 Modern Slavery St, however, Viterra has its own MSS, which notes: ‘We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour’. However, this subindicator looks for evidence that it prohibits business partners from retaining workers’ personal documents or restricting workers’ freedom of movement or requiring workers to use Company provided accommodation in its contractual arrangements or within its supplier code. No further evidence found. [Viterra - MS 2020, 2021: viterra.com] & [2022 Modern Slavery St VITERRA, 2023: viterra.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes working with suppliers on free movement of workers • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: 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: Requirements on FoA/CB in suppliers codes and contracts: The Company has provided comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra [segment of the agriculture sector] has its own Supplier Code. Viterra Supplier Code of Conduct states: 'We expect our suppliers to: [...] respect workforce rights to lawful freedom of association and collective bargaining; [...] prohibit all forms of discrimination based on [...] trade union membership or any other potential bias'. However, it is not clear the Company expects business partners to prohibit violence and that these requirements extend to trade union representatives. [Supplier Code of Conduct_VITERRA, N/A: viterra.com] • Not Met: Describes work with suppliers on FoA/CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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: Requirements on H&S in supplier codes and contracts: Viterra Supplier Code of Conduct states: 'We expect our suppliers to: [...] comply with all applicable laws and regulations to ensure safe and healthy work places; provide access to (emergency) healthcare; provide a safe working environment, including appropriate personal protective equipment and access to clean water and sanitation; provide regular health and safety training to their workforce; and have appropriate controls protecting the safety and health of their workforce'. [Viterra - Code of Conduct, N/A: viterra.com] • Not Met: Discloses injury rate or lost days in supply chain in 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: Discloses fatalities for workers in supply chain in 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] • Not Met: Discloses occupational disease rate in supply chain in last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: 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: Requirements on land and tenure rights in supplier codes and 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: Describes work with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to provide compensation in resettlement • Not Met: Assessment of scope of land rights issues in supply chain • Not Met: 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: Requirements on access to water and sanitation in supplier codes and contracts: The Company has provided additional comments to this subindicator referring to the Glencore Supplier Code of Conduct [extractive sector], which is not clear the be valid to its agriculture sector, as Viterra [segment of the agriculture sector] has its own Supplier Code. Viterra Supplier Code of Conduct states: 'we expect our suppliers to: [...] responsibly manage their [...] water quality; [...] provide a safe working environment, including appropriate personal protective equipment and access to clean water and sanitation; improve their efficiency of [...] water and natural resource usage'. However, it should also include refraining from negatively affecting access to safe water, in its contractual arrangements with its suppliers or in its supplier code of conduct. [Viterra Supplier Code of Conduct, N/A: viterra.com] • Not Met: Describes work with suppliers on access to water <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of water and sanitation issues in supply chain • Not Met: 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: Requirements on women's rights in supplier codes and 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: viterra.com] & [Suppliers Standards, 2020: glencore.com] • Not Met: Describes work with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of women's rights issues in supply chain • Not Met: 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 time-bound target: The 2021 Annual Report indicates: 'Wages, salaries, bonuses, social security contributions, paid annual and sick leave are accrued in the period in which the associated services are rendered by the employees of the Group'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [2021 Annual Report - Glencore, 2022: glencore.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying living wage • Not Met: Reviews definition living wage with unions
D.3.2	Transparency and accountability (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: 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 Accounting Directive requirements. [2021 Payments to Governments Report, 2022: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country: The 2021 Payments to Governments Report contains payments made in the different countries in which it operates: 'We are committed to complying with all applicable tax laws, rules and regulations. We pay all relevant taxes, royalties and other levies in amounts determined by the legislation of relevant national, regional or local governments. We seek to maintain long-term, open, transparent and cooperative relationships with tax authorities in our host countries'. However, the world map of its activities shows that it has, at least, oil projects in Brazil [Alesat], and a recycling plant in China [Osceola] as well as other offices. Hence, it is not clear it reports on every country it operates, as the Company's webpage indicates it has operations in China, Brazil, for example, and taxes for these places do not seem to be reported. Evidence should cover, at least, the Company's extractive operations, and it seems to have at least one operation in Brazil. [2021 Payments to Governments Report, 2022: glencore.com] & [World Map_web, N/A: glencore.com] • Not Met: Steps taken to promote transparency in non EITI countries • Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements
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: Measures to prohibit violence/retaliation against workers for joining trade union: 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'. High union recognition, in this case 71% [see below], is taken as a proxy for not intimidating or retaliating. [Human Rights Policy, 2021: glencore.com] & [2021 Sustainability Report - Glencore, 2022: glencore.com] • Met: Discloses % of total direct operations covered by CB agreements: The 2021 Sustainability Report discloses the percentage of total employees covered by collective bargaining agreements in 2021: 71%. [2021 Sustainability Report - Glencore, 2022: 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)	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 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; [...] 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'. As for its Health management, the webpage section Health notes: 'We identify, manage, mitigate or eliminate health and safety risks in our business. Our occupational health management strategy addresses the health risks facing our workforce, their families and the communities inside and outside our gates. The strategy has three pillars, which build on what has proved successful at individual assets: Healthy workplaces, Fit for work, and Fit for life'. 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.' [Safety, N/A: glencore.com] & [2021 Sustainability Report - Glencore, 2022: glencore.com] • Met: Discloses injury rate or lost days for last reporting period: The 2021 Sustainability Report indicates: 'During the year, both our lost time injury frequency rate^{1,2} (LTIFR) and total recordable injury frequency rate³ (TRIFR) were lower than the previous year at 0.83 (2020: 0.94) and 2.4 (2020: 2.7), respectively'. [2021 Sustainability Report - Glencore, 2022: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Discloses fatalities for last reporting period: The 2021 Sustainability Report discloses the fatalities at managed operations in 2021: zero. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Met: Discloses occupational disease rate for last reporting period: The Company has reported also information about new occupational diseases in 2021: 82. [2021 Sustainability Report - Glencore, 2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company has a 'zero fatalities' goal. However, no target related to occupational disease and injuries/lost days. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Met: Met targets or explains why not or actions to improve H&S 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/recognise 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. No further evidence found in latest revision. [Human Rights Report 2019, 19/06/2020: glencore.com] • Met: Describes how indigenous communities are engage 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'. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [Sustainability Report 2020, 2021: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to FPIC: See above. It indicates 'We work to obtain the free, prior, and informed consent of Indigenous Peoples for new projects and changes to existing projects'. However, 'work to obtain' is not considered a formal statement of commitment according to CHRB wording criteria. [2021 Sustainability Report - Glencore, 2022: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2021 Sustainability Report indicates: 'Our McArthur River Mine (MRM) in Australia is surrounded by the Northern Territory's Gulf Region communities, a huge area that includes 120km from the operation to MRM's Bing Bong Loading Facility. MRM's operations are located on Gudanji land and MRM engages with the Gudanji, Yanyuwa, Garrwa and Marra people in the four language groups in the Gulf Region. MRM is also located 65 kilometres south-west of the Borrooloola Township. MRM's approach is consistent with the principles of Free, Prior and Informed Consent'. However, although the Company indicates that its approach was consistent with the principles of Free, Prior and Informed Consent, it is not clear whether it was actually obtained. [2021 Sustainability Report - Glencore, 2022: glencore.com]
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: Describes approach to identifying lang tenure rights holders and negotiating compensation <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation: The 2021 Sustainability Report indicates: 'In 2021, our South African coal business successfully relocated the remaining household from its Goedgevonden operation, and two households from its Impunzi operation. At Zonnebloem, an additional family will need to be relocated by 2031, in line with the amended life of mine plan. This family has recently expressed a desire for an urban relocation and has requested the operation to consider an earlier relocation, to which the operation has agreed. The operation is in the process of commissioning the compilation of a relocation action plan'. However, no evidence found regarding the valuation and compensation process (methods, legitimate tenure rights holders participation in the valuation). [Sustainability Report 2020, 2021: glencore.com] • Not Met: Describes steps to meet IFC PS 5 in state deals: The 2021 Sustainability Report indicates: 'We seek to avoid involuntary resettlement wherever possible. Where it is unavoidable, we follow International Finance Corporation Performance Standard 5. This seeks to minimise its impact through the full participation of affected stakeholders and a focus on building long-term productive livelihoods, in a manner conducive to their wellbeing and human rights'. However, no description found of the steps it would take to meet the standards with respect to legitimate tenure rights holders. [Sustainability Report 2020, 2021: glencore.com]
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: Describes security implementation (incl. VPs or ICOC) and provides an example: The 2021 Sustainability Report indicates: 'Our revised Security Standard, rolled out Group-wide during 2021, requires all our industrial assets to develop, implement and monitor security management plans to document the identified threats, risks, impacts, controls and management strategies within their area of influence, and mitigate security impacts and risks, based on the outcomes of the threat and risk assessment. The security management plans must align with the criteria listed in the Voluntary Principles. [...] Our internal HSEC audit programme assesses the adequacy and effectiveness of our industrial assets' security management plans. [...] The audit found evidence of good practices across the Group. In particular: continuous security risk assessments; use of technology, such as thermal cameras and sensor equipment, use of drones and multiple security check points prior to entry and exit; counselling for security personnel'. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Met: Ensures Business Partners/JVs follow security approach: The Supplier Code of Conduct indicates: 'Where applicable, we expect our suppliers to support, implement and promote the Voluntary Principles on Security and Human Rights. This includes training their security workers on the Voluntary Principles and being clear about their expectations when engaging with public security'. [Supplier Code of Conduct_GLENCORE, 06/2022: glencore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities: The 2021 Sustainability Report indicates: 'Our Group Human Rights policy requires our offices and industrial 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. [2021 Sustainability Report - Glencore, 2022: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Two examples of working with local communities to improve security: 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 in a more recent report. The Company is expected to provide two examples in order to meet the requirement. [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: Describes preventative/corrective action plans for 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] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Sets targets on water stewardship that consider water use by local communities: The 2021 Sustainability Report indicates: 'We are committed to ensuring good water management is in place at our assets and undertake detailed assessments, target setting, monitoring and implementation of corrective actions. Our industrial 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 the DRC, our Mutanda industrial asset is targeting increasing its supply of drinking water to local communities by 20% by 2024, against a 2020 baseline. This includes installing boreholes and associated equipment, such as pumps, tanks and pipes. [...] In the UK, Britannia Refined Metals (BRM), a lead smelter, is targeting a 5% year-on-year reduction of potable water consumed by 2023, against a 2020 baseline'. [2021 Sustainability Report - Glencore, 2022: glencore.com] & [Water management performance, N/A: glencore.com] • Met: Reports progress in meeting targets and trends demonstrating progress: The Company reports its progress with respect its water targets on its website and its current status. For example, regarding the DRC: 'Mutanda has established a water committee to steer and monitor this project. The next steps involve a community groundwater modelling to identify the right locations for the required boreholes'. As for the target in the UL, it notes: '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: Describes processes to stop harassment and violence against women: The Equality of Opportunity Policy indicates: 'We provide equal opportunity to our employees regardless of [...] sex [...]'. It adds: 'Glencore takes breaches of our Code and policies seriously. Consequences for breaching this policy depend on the severity of the breach but may range from a warning to termination of employment. In certain instances, there may also be civil and/or criminal liability'. The Company has also made reference to its Diversity and Inclusion Policy, in its feedback to CHRB. However, this subindicator looks for a description of its the process to prohibit and address harassment, intimidation and violence specifically against women. No further evidence found. [Diversity and Inclusion Policy, 01/06/2021: glencore.com] & [Equality of Opportunity Policy, 2021: glencore.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Working conditions take into account gender issues: The Equality of Opportunity Policy indicates: ‘We provide equal opportunity to our employees regardless of [...] sex [...]’. The Company has also made reference to its Diversity and Inclusion Policy, in its feedback to CHRB. However, this subindicator looks for a description of how it takes into account differential impacts on women and men of working conditions, including to reproductive health. No further evidence found. [Diversity and Inclusion Policy, 01/06/2021: glencore.com] & [Equality of Opportunity Policy, 2021: glencore.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2021 Sustainability Report notes ‘Glencore’s workforce is around 135,000 people, of which 17% are female (2020: 16%). We have seen a modest increase in the representation of female workers in our business but have made greater progress at management levels. Around 20% of our senior managers reporting to the management team are women, a slight improvement on previous years. Employee turnover in continuing operations is 9.1%, with statistically insignificant differences between the retention rates for men and women’. The Equality of Opportunity Policy indicates: ‘We provide equal opportunity to our employees regardless of [...] sex [...]’. It adds: ‘We are committed to establishing a fair and equal workplace with high standards of performance. We believe in the principle of equal pay for work of equal value and contribution. We provide all employees with equal access to pay calculations and transparency of pay in line with their agreed and lawful terms and conditions of employment for work performed in line with global standards and local requirements’. The Company has also made reference to its Diversity and Inclusion Policy, in its feedback to CHRB. However, this subindicator looks for a description of measures and steps it takes specifically to address any gender pay gap throughout all levels of employment. No further evidence found. [Equality of Opportunity Policy, 2021: glencore.com] & [2021 Sustainability Report - Glencore, 2022: 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: Working Hours • Headline: Glencore faced strike at Canadian Raglan mine's operations over labour relations and alleged lack of respect of working hours • Story: On May, 27, 2022, press sources reported that Glencore faced a strike from its Canadian Raglan mine's employees alleging lack of respect, deteriorating working conditions and opposing the use of subcontractors. <p>Reportedly, the employees engaged in the first strike in 25 years of operations. The 630 workers represented by the trade union the United Steelworkers Union, Local 9449, agreed to engage in the strike after negotiations with the company, under the supervision of a government mediator, didn't result in an agreement.</p> <p>The president of the trade union stated the following further explaining from where the complaints of the employees emerged: "Glencore has been continually pushing the limits. It even balks at providing a proper lunch hour to workers who are working 11 hours a day, 21 days in a row. It reached the point where those who refuse to work overtime are given the cold shoulder by the bosses. Living conditions at the mining camp have deteriorated over the years. The employer systematically quibbles over the living and working conditions of employees who are away from their families for long periods of time. It's time for this company to show greater respect for the workers who are generating its profits of tens of millions of dollars each year."</p> <p>Amid the strike, the company decided to halt its operations. But on June, 17, 2022, it was revealed that the company "started to resume its operations regardless of the ongoing strike. Some employees will indeed return to the mine to supervise operations related to maintaining infrastructure and increasing the ore reserve at the surface. However, the entire operations would allegedly still be below normal".</p> <p>On August 31, 2022, press sources reported on Glencore's Raglan mine employees in Canada reaching a "tentative" agreement with the Company after 630 Steelworkers union members went on strike to "demand better working conditions" on May 27, 2022. This development could lead to production restarting which had been put on hold for more than three months.</p> <p>According to a Steelworker union official, the 630 union members would vote on the new offer the details of which had not been disclosed, and would continue striking until a vote was known.</p> <p>A 15-week strike at the Raglan Mine in Nunavik has ended following the ratification of a new collective agreement during a voting process held by union members in September 2022. Workers approved the new contract by a 60.7% majority.</p> <p>[Business Wire, 28/05/2022, "630 Steelworkers Are on Strike At Glencore's Raglan Mine": businesswire.com] [The Northern Miner, 30/05/2022, "Glencore suspends production at Raglan mine in Nunavik after workers strike": northernminer.com] [Financial Post, 31/08/2022, "Glencore Canadian mine workers reach 'tentative agreement' that could end three-month strike": financialpost.com] [United Steelworkers/Syndicat des Métallos, 08/09/2022, "Raglan Mine strike ends, Steelworkers make gains in five-year contract": usw.ca]</p>
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: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: On May 26 2022, Glencore published a press release on the Raglan Mine. The company shared that it has requested the Ministry of Labour, Employment and Social Solidarity to appoint an independent mediator to facilitate discussions with the United Steelworkers Union. The company subsequently released several press releases regarding the Raglan Mine and the negotiations between Glencore and the workers union on its website. <p>[Renegotiation of the collective agreement: Raglan Mine requests an independent mediator, 26 May 2022: glencore.ca] & [Publications and news releases, N/A: glencore.ca]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In its statement released in May 2022, the company stated that it is "convinced that by continuing discussions, by listening, by showing consideration and respect, it will be possible to reach an agreement that takes into account employees' demands." [Renegotiation of the collective agreement: Raglan Mine requests an independent mediator, 26 May 2022: glencore.ca]
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"> • Met: Engaged with stakeholders: In August 2022, after months of negotiations, Glencore PLC reached a "tentative agreement", with workers at Raglan Mine which was approved by a 60.7% majority of workers and lead to the ratification of a new five-year collective agreement. [The Northern Miner, 30/05/2022: northernminer.com] [United Steelworkers/Syndicat des Métallos, 08/09/2022: usw.ca] • Not Met: Identified cause: The company provided feedback for this indicator, however, no specific evidence was found supporting the claims. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The new five-year contract provides for wage increases of 6.8% in the first year, 3.5% for the following two years and 3% for each of the last two years. A 10% bonus that was negotiated in previous years will now be rolled into the general wage structure. Other improvements in the agreement include: A lump sum payment, equivalent to six hours of wages, will be paid to each worker on a travel day, when they are flown to the mining operation. The agreement resolves a three-year-old grievance, and includes retroactive payments. The benefit plan is improved and benefits will be increased for short-term sick leave. A mechanism will be established to ensure greater transparency in the use of subcontractors, while 20 positions that were previously filled by subcontractors will now be filled by union members. A new, two-weeks-on, two-weeks-off work schedule has been introduced and will be offered on a voluntary basis to all workers. All workers will now have access to a fourth week of vacation after 16 years of service, a new gain for workers on a 50-50 schedule (whether 3-2-2-3 or 2-2). Thereby, the company agreed to improve its policies on working conditions after the events. [United Steelworkers/Syndicat des Métallos, 08/09/2022: usw.ca] • Met: Stakeholder input to steps taken: The improvements in working conditions achieved with the new collective agreement following the strike and negotiations with the trade union show that the views of affected stakeholders were taken into account in the improvement of the company policies.
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: The company provided feedback for this indicator, however, no specific evidence was found supporting the claims. <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: The company provided feedback for this indicator, however, no specific evidence was found supporting the claims. • Not Met: Independent remedy process used: The company provided feedback for this indicator, however, no specific evidence was found supporting the claims.
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Health & Safety; Right to a safe, clean, healthy and sustainable environment • Headline: Complaint filed against Glencore over toxic spill in Chad • Story: On March 16th, 2020, RAID a UK based NGO, accused Glencore of ignoring injuries after spill at Chad Oilfield. Glencore allegedly ignored reports of serious injuries to local residents in Chad living near its Badila oilfield following a September 2018 wastewater spill and oil pipe leak. The Badila oilfield is operated by PetroChad Mangara subsidiary of Glencore. <p>The wastewater poured into the local Nya Pende River, crucial for the daily life of thousands of local residents. RAID conducted an 11-day field mission to the villages near the Badila oilfield in June 2019 and interviewed 116 people. At least 50 local residents, many of who were children, said they suffered burns, skin</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>lesions, and pustules after bathing in the water in the days and weeks that followed. Others reported blurred vision, stomach aches, vomiting and diarrhoea after using the water. Some required hospitalisation, including at least 2 children. Local residents noticed fish floating dead and said dozens of livestock died suddenly after drinking the river water.</p> <p>“Glencore repeatedly turned a blind eye to reports of dozens of injuries from local residents, simply ignoring the complaints as if they were of no consequence,” said Anneke Van Woudenberg, the Executive Director of RAID, and added “16 months later Glencore still hasn’t concluded a thorough and independent investigation.”</p> <p>On 10 September 2020, three human rights groups filed a complaint with the Organization for Economic Co-operation and Development (OECD) detailing environmental and human rights harms at Glencore's Badila oil operations in Chad. The OECD filing came on two years after a toxic wastewater spill on 10 September 2018 when a basin that was holding produced water, a by-product of crude oil production, collapsed at the Badila oilfield in southern Chad.</p> <p>The incidents left at least 50 local residents living near Glencore's oil operations with burns, skin lesions, sickness and diarrhoea after bathing in or using the contaminated river water.</p> <p>The complaint to the OECD, on behalf of approximately 18,000 local residents affected by the Badila's operations, was filed by UK-based corporate watchdog RAID and Chadian organisations the Public Interest Law Center (PILC) and the Association of Young Chadians of the Petroleum Zone.</p> <p>On 27 January 2021, the UK government accepted a human rights complaint against Glencore regarding a toxic wastewater spill in Chad, where dozens of villagers – among them, children – claim they suffered severe injuries after contact with contaminated water.</p> <p>The complaint, brought by three human rights groups on behalf of affected communities, alleges environmental abuses and social engagement failures by the company in relation to two spillages, the wastewater spill and an alleged oil spill, both in 2018. In September 2018, a basin holding run-off water from crude oil production collapsed at the oil field, which is run by Glencore subsidiary PetroChad, in the south of the West African country. As a result, 85m litres of wastewater was released into nearby fields and flooded the local river, which local people use for drinking and washing. According to the human rights group Rights and Accountability in Development (RAID), 50 local people reported burns, skin lesions, sickness and diarrhoea after bathing in or using the contaminated river water in the weeks following the incident.</p> <p>[RAID, 16/03/2020, "Glencore Ignored Injuries After Spill at Chad Oilfield": raid-uk.org] [RAID, 10/09/2020, "OECD Complaint Filed Against Glencore UK for Toxic Spill in Chad": raid-uk.org] [The Guardian, 28/01/2021, "Mining giant Glencore faces human rights complaint over toxic spill in Chad": theguardian.com] [The Water Diplomat, 08/02/2021, "UK Government Will Investigate Chad Water Contamination Complaint Against Mining Giant Glencore": waterdiplomat.org]</p>
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: Glencore responded to RAID's request for clarification and specific questions on the basin collapse and following events. Overall, Glencore refuted that the spill posed a health risk and said the wastewater from the basin was predominately rainwater. In written correspondence with RAID in an October 2019 meeting, the company said it based this conclusion on a sample taken from the basin on the day of the spill, which “was found to be within the limits required by the International Finance Corporation’s performance standards.” <p>Glencore stated “we continue to believe that the identified medical cases are unrelated to our operations, however, we are committed to trying to understand the root causes.” Glencore informed RAID that following its research, the company is reviewing its water sampling and testing protocols and that its grievance mechanism will undergo an internal audit. It also confirmed the appointment of an independent consultant to conduct an assessment on ground water, river water and soil samples around the Badila concession and the commissioning of an “independent Health Impact Risk Assessment.”</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>With regard to the acceptance of the OCSE complaint by the UK National Contact Point (NCP), Glencore said: "Glencore has participated in the UK NCP's initial assessment of the complaint and acknowledges their decision that the issues relating to the 2018 wastewater incident merit further examination". "We also note that UK NCP's decision to further examine aspects of the complaint is not a finding against Glencore UK or a determination by the UK NCP that Glencore UK has acted inconsistently with the guidelines," the statement continued. [RAID, 16/03/2020, "Glencore Ignored Injuries After Spill at Chad Oilfield": raid-uk.org] [Business & Human Rights Resource Centre, "Correspondence between RAID and Glencore": business-humanrights.org] [The Water Diplomat, 08/02/2021, "UK Government Will Investigate Chad Water Contamination Complaint Against Mining Giant Glencore": waterdiplomat.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: While rejecting the allegation, Glencore provided a detailed response to all questions submitted by RAID in preparation for the publication of the report, as shown by the correspondence between the company and RAID. [Business & Human Rights Resource Centre, "Correspondence between RAID and Glencore": business-humanrights.org]
E(2).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"> • Met: Engaged with stakeholders: In its response to RAID's engagement questions on the spill, Glencore shared that it met with community and government representatives during a site visit. The company stated that samples taken during this visit found that there was no health impact on community members. [RAID, 08/2019-08/2020, "all correspondence raid and glencore sept 2020 web": raid-uk.org] • Not Met: Identified cause: Glencore said it would commission an "independent Health Impact Risk Assessment" at the Badila oilfield, but this has yet to be concluded. [RAID, 10/09/2020, "OECD Complaint Filed Against Glencore UK for Toxic Spill in Chad": raid-uk.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence the company implemented improvements in its policies/processes and/or made changes to its management systems following the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: In its response to RAID's engagement questions on the spill, Glencore shared that it paid compensation to affected communities. [RAID, 08/2019-08/2020, "all correspondence raid and glencore sept 2020 web": raid-uk.org] • Not Met: Evidence for lack of Impact or link: The company denies being link to the allegation, claiming that the wastewater from the basin was predominately rainwater and that "the identified medical cases are unrelated to our operations". However, this is not sufficient evidence to prove the company is not linked to the impact. [RAID, 16/03/2020, "Glencore Ignored Injuries After Spill at Chad Oilfield": raid-uk.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: In September 2020 a complaint was filed to the OECD, indicating that affected stakeholders are still pursuing remedy. [RAID, 16/03/2020, "Glencore Ignored Injuries After Spill at Chad Oilfield": raid-uk.org] • Not Met: Remedy delivered: In Septmeber 2020 a complaint was filed against the Company at the OECD, citing a lack of concrete action and remedy by the company. [RAID, 16/03/2020, "Glencore Ignored Injuries After Spill at Chad Oilfield": raid-uk.org] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 litres 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> <p>In January 2021, a coalition of human rights and environmental NGOs led by the Global Legal Action Network (GLAN) demanded before the Organization for Economic Co-operation and Development the closure of the Cerrejón coal project in Colombia. The activists filed simultaneous complaints before the OECD National Contact Points in Australia, Ireland, Switzerland and the UK, alleging "serious human rights abuses and devastating environmental pollution" at Cerrejón.</p> <p>On August 9, 2022, the London Mining Network reported on village of Tabaco in La Guajira, Colombia, still awaiting justice in relation to its residents facing evictions and destruction of their villages sacrificed for the expansion of the Cerrejon opencast coal mine in August 2001.</p> <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] [London Mining Weekly, 28/01/2022, "OECD accepts complaints against Anglo American, BHP and Glencore at Cerrejón": londonminingnetwork.org] [GLAN, 20/12/2022, "Human Rights & Environmental harms at Cerrejón Mine": glanlaw.org]</p>
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: On 30 July 2021, Glencore submitted a written statement to the Swiss National Contact Point (NCP) concerning the issues raised in the specific instance. According to Glencore, GLAN's request should be rejected by the Swiss NCP for a number of reasons. <p>In addition, Cerrejón provided information on its positive economic and social contributions locally, an explanation of how very similar issues have been, or are being, considered in other domestic or international proceedings and responses to the detailed factual allegations by GLAN.</p> <p>In its 2021 Sustainability Report, the company stated that "Glencore does not believe that the allegations included in the complaint have merit." [OECD Watch,</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>19/01/2021 "COMPLAINT GLAN vs. Glencore": oecdwatch.org [2021 Sustainability Report - Glencore, 2022: glencore.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> Met: Detailed response: In November 2020, Cerrejon responded to the Business and Human Rights Resource Centre for comment regarding the allegations made by indigenous leaders. The company shared that "within the framework of its social management plan, the company maintains a relationship with the communities neighbouring its operation based on the principles of good faith, transparency and participation, including the Provincial Indigenous Reservation. Likewise, it seeks to act in a manner that respects the law, the standards adopted by the company, and the autonomous decisions of the indigenous communities as well as their traditions and customs... Cerrejón respects the internal differences that exist in the community and the decision of a small group of families, leaders and traditional authorities to not participate in the talks led by the Town Council with the other authorities, which led to the initial agreement reached between Cerrejón and the community." [Cerrejon, 30/11/2020, "Response by Cerrejon coal": business-humanrights.org] [2021 Sustainability Report - Glencore, 2022: glencore.com]
E(3).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"> Met: Engaged with stakeholders: In October 2022, Cerrejon signed new consultation agreements with 21 indigenous communities from various municipalities. The consultation process involved the Uribia Secretary of Indigenous Affairs, the Maicao Ombudsman's Office, the NGO Wayuu Nation, and the National Authority for Environmental Licenses (ANLA). The agreement involved various impact mitigation measures. [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] [Mining.com, 20/01/2021, "NGOs file complaint before OECD, demand closure of Cerrejón coal mine in Colombia": mining.com] [GLAN, "Swiss National Contact Point calls on Glencore to carry out due diligence at its Cerrejón Coal mine": glanlaw.org] [Cerrejón signs new consultation agreements with 21 indigenous communities, 19/10/2022: cerrejon.com] Not Met: Identified cause: Cerrejon conducted community consultations regarding resettlement issues, however, it did not present investigative results regarding the underlying issues of the events. <p>Score 2</p> <ul style="list-style-type: none"> Met: Identified and implemented improvements: Cerrejon is in the process of negotiating consultation agreements with hundreds of indigenous communities in the areas where in operates in Colombia. Out of the 405 communities it must consult, the company shared that it has already reached agreements with 240. As of October 2022, "Cerrejón has made progress on the implementation of agreements reached with 187 communities through fulfilment of approximately 723 initiatives under the following 6 lines of social investment: [Infrastructure for water solutions, education, basic sanitation and general benefit of the community; income generating projects for communities; and cultural strengthening projects. [Cerrejon Sustainability Report 2021, N/A: cerrejon.com] & [Cerrejón signs new consultation agreements with 21 indigenous communities, 19/10/2022: cerrejon.com] Met: Stakeholder input to steps taken: See above. [Cerrejon Sustainability Report 2021, N/A: cerrejon.com] & [Cerrejón signs new consultation agreements with 21 indigenous communities, 19/10/2022: cerrejon.com]
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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>[Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link Score 2 • Not Met: Remedy satisfactory to stakeholders: On the basis of evidence available to the CHRБ no remedies were provided. [Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org] • Not Met: Remedy delivered: On the basis of evidence available to the CHRБ no remedies were provided. [Cerrejon Letter regarding Roche Community, 29/01/2019: business-humanrights.org] • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Right to a safe, clean, healthy and sustainable environment • Headline: Yukpa indigenous people claim Glencore caused environmental damage in Cesar, Colombia • Story: On 20 August 2020, an article from London Mining Network reported that six communities of the Yukpa people from the province Cesar in Colombia sent an open letter to various Colombian authorities over the environmental damage allegedly caused by Glencore. <p>The Yukpa people claimed that the death of 42 indigenous children between 7 August 2018 and 7 August 2019, was due to the malnutrition caused by environmental problems and loss of territory. Rivers were no longer accessible to the Yukpa where they fished, that their hunting grounds were lost, and that their territory, where they carried out semi-nomadic farming and gathering activities, was narrowed.</p> <p>Accordingly, the Yukpa are demanding that Attorney General Barbosa, along with the Director of the Environmental Prosecutor’s Office, visit the places where mining companies Glencore and Drummond (a private US company) have diverted the rivers. During an audit of the mining projects in the Serranía del Perijá, the Contraloría uncovered various irregularities, some of which are criminal in nature.</p> <p>The inspection by the Contraloría revealed various examples of irreparable environmental damage caused by the mining companies in the region. The territory and the environment have been damaged and polluted, with negative consequences for the population, the forest reserve, the quality and quantity of the water, as well as the air quality and biodiversity.</p> <p>Glencore Prodeco and Drummond, together with ANLA (national environmental licensing authority), Corpocesar (regional environmental authority) and the Directorate for FPIC (Free, Prior, Informed Consent) of the Ministry of the Interior, have removed over 10,000 hectares of land from the Los Motilones forest reserve to enable mining. The companies mining operations allegedly have dried up the rivers.</p> <p>On March 28, 2022, the indigenous communities and trade unions of the mining corridor of Prodeco, subsidiary of Glencore in Cesar and Magdalena, wrote to the Colombian President and the Chief Executive of Glencore demanding effective consultation over a mine closure plan.</p> <p>The communities have denounced a violation of the communities' right to effective participation, access to information and transparency in the construction of the mine closure plan after 25 years of operations at the La Jagua and Calenturitas mines. They demand that Glencore make public the plan to close operations at the mines before the legal handover of these mines to Colombia and that a dialogue table be opened with the communities in the mining corridor, victims and unions.</p> <p>They alleged that the company ignored the serious environmental, social, labour and human rights impacts and damage caused by its mining activity. Reportedly, the local communities, including more than 20,000 thousand peasant, Afro-descendant, fishing and indigenous families, were left in a "state of hunger, environmental degradation, living with serious respiratory and digestive diseases, without access to drinking water, with serious atmospheric pollution, displaced from their sacred and ancestral territories, and in a state of unprecedented chronic poverty caused by the inadequate exploitation that this company carried</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>out in these two mines and the insufficient social and environmental measures it took during its operations."</p> <p>The communities also claimed that the company did not conduct any independent study on the cumulative impacts and damages, nor was there any public accountability on the company's due diligence in meeting its social and environmental obligations.</p> <p>Moreover, according to the allegations, the company did not implement the appropriate legal procedures to carry out a progressive process of worker disengagement prior to the closure of its mines in Colombia. Allegedly, more than 1,200 workers were dismissed without guarantees and more than 5,000 contractors were laid off, generating a serious unemployment situation in the area.</p> <p>Finally, indigenous communities alleged that although Prodeco has been investigated and denounced for its links to armed actors and its relationship to armed conflict and human rights violations in relation to the operation of its two mines, to date it is unclear what measures and obligations the company will put in place to ensure compensation for victims in view of its plans to close its operations in this area. They demand, in this regard, that the company take special measures towards the victims of the armed conflict as part of the plan to close its operations in this region of Colombia.</p> <p>[London Mining Network, 20/08/2020, "Glencore under fire from Yukpa Indigenous People in Cesar, Colombia": londonminingnetwork.org] [London Mining Network, 29/03/2022, "Colombian communities demand mine closure plan from Glencore": londonminingnetwork.org]</p>
E(4).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: In February 2022, Prodeco published a human rights due diligence report on its operations in Cesar, Colombia. However, impacts on the indigenous Yukpa people are not addressed in the report. Glencore, for its part, made no public statement on the facts under investigation. [Pax, 22/02/2022, "Prodeco publishes human rights due diligence report, but is not clear on its role in the Colombian conflict": paxforpeace.nl] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(4).2	The company has investigated and 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: Engaged with stakeholders: As part of a Human Rights Impact Assessment conducted in 2019, Prodeco engaged directly with local stakeholders and rights holders from within the company's area of influence. In Glencore's 2021 Sustainability Report, the company shared that Prodeco "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... 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." However, it is unclear if the company or the linked business engaged with the affected stakeholders on the specific alleged impacts outlined above. [2021 Sustainability Report - Glencore, 2022: glencore.com] • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>In the letter to the Colombian President and the Chief Executive of Glencore, the affected communities state: "We denounce that to date NO independent studies have been carried out on the cumulative impacts and damages caused by Prodeco's operations." [London Mining Network, 29/03/2022, "Colombian communities demand mine closure plan from Glencore": londonminingnetwork.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company decided to divest from coal exploitation in the region. However, there is no evidence that this decision was made in light of the events considered in the allegation in order to improve the living conditions of the surrounding communities. • Not Met: Stakeholder input to steps taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: There is no evidence suggesting the company provided remedy to the affected stakeholders. The Company provided feedback for this indicator, highlighting Prodeco's scheme of promoting entrepreneurship in Cesar. However, it is not clear if the scheme is related to the alleged events. General investment into an area is not considered remedy of human rights impacts. [Grupo Prodeco, 23/03/2023, "Prodeco Promotes Entrepreneurship in Cesar": grupoprodeco.com.co] • 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. <p>On 18 October 2021, Dutch pension fund ABP sold its EUR 57 million stake in Glencore, due to concerns over human rights risks linked to the stock. ABP reported that divestment was based on the most recent evaluation of the engagement with the company that it has initiated in 2018. The pension fund said Glencore faces major sustainability risks, including bribery and corruption, conflict with local communities, pollution and poor working conditions. ABP has also engaged with Glencore on the use of child labour in cobalt mining in the Democratic Republic of Congo. ABP said there is no evidence or suspicion that Glencore itself uses child labour. However, small-scale cobalt mining takes place mines run in DR Congo, including those operated by Glencore. The pension fund said child labour and unsafe working conditions are common in small-scale mining. [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] [IPE, 18/10/2021, "ABP exits Glencore investment over human rights concerns": ipe.com] [Glencore statement on child labour allegations, 17/12/2019: glencore.com]</p>
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 labour. 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 investigated and taken	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 artisanal mining. Engagement to find causes for artisanal mining alone are not

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>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.</p> <p>Glencore PLC co-founded the Fair Cobalt Alliance, or FCA, in August 2020, with the mission to positively transform artisanal and small-scale mining in the DRC and work towards eliminating child labour. [Responsible Minerals Initiative, 13/07/2021: responsiblemineralsinitiative.org] [S&P Global Market Intelligence, 25/03/2022, "Responsible cobalt from Congo artisanal mining proving a challenge for industry": spglobal.com] [Glencore statement on child labour allegations, 17/12/2019: glencore.com] & [World Day Against Child Labour 2021, 11/05/2021: 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 engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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 • 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 body's 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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 Coroccohuayco mining project, owned by the Anglo-Swiss transnational Glencore PLC.</p> <p>"On 6 October 2021, an indigenous community in Peru's Espinar province blocked a key mining road in protest against the environmental and social impact of the Antapaccay copper mine as well as the lack of government engagement with the local populace. On 8 October 2021, communities in Peru's Espinar province suspended the blockade of a major road after agreeing with Glencore's Antapaccay copper mining company to begin a ""new stage"" of dialogue to address their social demands.</p> <p>On April 13, 2022, five communities in the Espinar province in southern Peru announced their plans to launch a strike against the Coroccohuayco project and the Glencore Antapaccay mining company. According to the communities, the project in development will pollute their environment and the sources of fresh water. In September 2022, the communities have lifted their blockade following an agreement reached with the government.</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] [Reuters, 11/10/2021, "Peru community suspends protest against Glencore's Antapaccay mine, says local leader": reuters.com] [Peru Support Group, 24/09/2022, "SWIFT GOVERNMENT RESPONSE TO ESPINAR CONFLICT SEEKS TO REASSURE INVESTORS": perusupportgroup.org.uk]</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 of water contamination, 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.</p> <p>With regard to the allegation of the environmental impacts of the Coroccohuayco project, in October 2021, Antapaccay announced that it wasn't planning to execute the project in the short term because it has caused nearby residents to protest and block the road used to transport its copper. The miner said in a statement that they support having a consultation process before deciding to build Coroccohuayco.</p> <p>"The project is still in the design and viability studies phase, and its development will depend on the results of those analyses," the company said.</p> <p>However, there is no public response from Glencore on the issue, as required by the methodology. It must therefore be concluded that the company did not address all aspects of the allegation in detail. [Swissinfo, 12/07/2021: swissinfo.ch] [CAFOD, 11/2016:; cafod.org.uk] [Reuters, 07/10/2021, "Glencore's Peru mine says won't proceed with Coroccohuayco project in near-term": reuters.com]</p>
E(6).2	The company has investigated and taken	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: After the residents' protest and road block in October 2021, Antapaccay said that it supported having a consultation process before deciding to build Coroccohuayco and it was having a meeting with residents

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>to discuss the project. However, there is no evidence that such a consultation of indigenous residence took place. [Reuters, 07/10/2021: reuters.com]</p> <ul style="list-style-type: none"> • 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 2022 the additional information provided by the company does not change the assessment of this indicator. [CAFOD, 11/2016: 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 2022 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 engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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 2022 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 2022 the additional information provided by the company does not change the assessment of this indicator. [CAFOD, 11/2016: cafod.org.uk] • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(7).0	Serious allegation No 7		<ul style="list-style-type: none"> • Area: Health & Safety; Child Labour; Working Hours; Right to a safe, clean, healthy and sustainable environment • Headline: NGO report highlights alleged human right abuses in Glencore mine in Bolivia • Story: On 10 November 2020, Public Eye also published an article alleging that the Porco mine operated by Glencore in Bolivia, has inhuman working conditions, frequent work accidents and pollutes the water. According to the NGO, underage workers are regularly admitted to the health centre in the village of Porco. Most accidents are caused by falling stone slabs due to explosions, and falls. The mine in Bolivia is operated by Sociedad Minera Illapa S.A., a 100% subsidiary of Glencore and employs 400 workers. <p>Allegedly, the mine poisons the water of the villages located beneath it. In Sora Molina for instance, the Porco authorities measured traces of zinc six times over the maximum level permitted in Bolivia in the Agua Castillo river, which is the inhabitants' main source of drinking water. The environmental and social impacts are severe: when lamas drink the water they die, crop yields have fallen by over half and, as consequence, people are leaving their villages.</p> <p>[Public Eye, 10/11/2020, "Glencore shirks its responsibility in Bolivia": publiceye.ch] [Public Eye, 10/11/2020, "We've simply been forgotten": stories.publiceye.ch]</p>
E(7).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 13 November, Glencore issued a statement in response to Public Eye's allegations. In the statement, the company rejected Public Eye's

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>claims, but provided no arguments to refute the main criticism. The company declared: " We acknowledge the November 10, 2020 report released by Public Eye, a Swiss NGO, on the Porco mine in Bolivia and the accompanying video distributed by the Committee of the Initiative for Responsible Multinationals (IMR). We refute the misleading and false allegations made in the report and accompanying video."</p> <p>Confronted with the report's findings, a Glencore spokesperson in Baar stated that the company was working with the authorities in Porco "to better understand their concerns around the water quality". According to Glencore, the offtake agreements between their subsidiary and the cooperatives at the Porco mine were subject to a due diligence requirement that specifically included operational safety and the risk of child labour. [Public Eye, 10/11/2020: publiceye.ch] [Public Eye, "Réponse à la prise de position de Glencore": publiceye.ch]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: The company in its response addresses all the problematic issues raised in the report. [Public Eye, "Réponse à la prise de position de Glencore": publiceye.ch]
E(7).2	The company has investigated and 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: Engaged with stakeholders: According to Glencore response: "Illapa has been in contact with the local authority to understand the concerns raised in September 2020 regarding water quality and, if necessary, will take appropriate action to resolve them". However, there is no evidence of direct engagement with affected stakeholders by the company. • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company in its response reiterates that its business units in Bolivia follow all labour, health, safety, environmental, community engagement and human rights standards. However, there is no evidence that the company has implemented improvements in its policies/processes and/or made changes to its management systems following the events alleged in the report and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(7).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: According to the report, if a miner dies, his family receives a set sum of USD 3,000. This cannot be considered a 'remedy' within the meaning of the methodology nor is there any evidence that the company provided any form of compensation to the affected stakeholders considered in the report. • Not Met: Evidence for lack of Impact or link: Glencore categorically rejects the allegations as 'misleading' and 'false', but does not provide any arguments/evidences that would substantially invalidate them. <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(8).0	Serious allegation No 8		<ul style="list-style-type: none"> • Area: Right to a safe, clean, healthy and sustainable environment • Headline: Glencore urged by Canada's national director of public health to cut its arsenic emissions at its Canadian Rouyn-Noranda Horne smelter • Story: On July 19, 2022, press sources reported that Glencore's Canadian Rouyn-Noranda smelter was urged by the residents of the region to make more investments to cut its arsenic and cadmium air releases. <p>Reportedly, the Rouyn-Noranda smelter released significant amounts of arsenic and cadmium into the air, to the point where a July 6, 2022, study by the Institute national de la santé publique du Québec (INSPQ) found that residents of the town have a higher risk of developing lung cancer than people who live elsewhere in the region. The INSPQ predicted that among the 43,000 residents of the town at the existing pollution levels, there would be an additional 14 incidences of lung cancer over the course of seven decades. Indeed, the analysis allegedly found that the arsenic emissions from the Horne smelter were approximately 100 nanograms per cubic meter, or nearly 33 times the permitted limit established by the Quebec Environment Ministry.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>It was also revealed that community agreed that the current situation was untenable and that Glencore needed to improve. Some supposedly called for the plant to halt its operations and others urged the company to invest more in its cuts in arsenic emissions to reach the threshold given by the state. As for the government's stand, it was reported that it also threatened the halt of the smelter's operations as it claimed the following: "Our priority is the health and safety of citizens. If the company is not able to reduce its emissions and get closer to the Quebec standard, we do not rule out closing the plant."</p> <p>On August 10, 2022, press sources reported that Canada's national director of public health, Luc Boileau, said that Glencore's smelter emissions must drop to 15 ng/m for good air quality, as studies attempted to show causal links between cancer and the company's Rouyn-Noranda Horne smelter emissions.</p> <p>According to a study by public health authorities in the region, the Horne smelter is said to be emitting an estimate of 165 nanograms of arsenic per cubic meter of air on site, which is allegedly 55 times the standard safe level of 3 nanograms.</p> <p>Reportedly, a mother who lives next to the plant provided the following statement in regards the high arsenic emissions by the smelters: "The children in the neighbourhood were tested, I was tested to find out my arsenic contamination level. The results are rather alarming." Furthermore, Boileau was reported to have said: "The actual situation from the Horne Smelter is not acceptable. At a threshold of 15 nanograms, the protection objectives will be achieved. It reduces the risk of lung cancer for the general population." It was revealed that in a neighbourhood near the plant, arsenic pollution reached an alleged level of 90 nanograms, or 30 times the standard.</p> <p>In August 2022, Quebec's environment minister announced that the Rouyn-Noranda Horne copper smelter in northwest Quebec will be permitted to release 15 nanograms of arsenic per cubic metre of air — five times the provincial norm. [CBC News, 06/07/2022, "Cancer from arsenic exposure in Rouyn-Noranda 'unacceptable' risk: Quebec public health director": cbc.ca] [Bloomberg, 10/08/2022, "Glencore Takes Heat for Quebec Smelter That Spits Out Arsenic": bloomberg.com] [CBC News, 16/08/2022, "Quebec allows copper smelter in northwest to emit arsenic levels 5 times norm": cbc.ca] [Financial Post, 10/08/2022, "'Not acceptable': Quebec targets Glencore over smelter that belches toxic levels of arsenic": financialpost.com]</p>
E(8).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: According to spokesperson Pierre-Philippe Dupont, Glencore, which bought the smelter in 2013, plans to invest \$54 million by 2021 to reduce all emission. "We've added many domes so we can manipulate the products inside a closed environment, instead of outdoors," said Dupont. The Horne smelter's general manager, Claude Bélanger, said his company should have acted sooner to reduce its emissions. Bélanger also said the smelter has many concrete plans to reduce emissions to the "lowest levels" it can. He said reducing emissions is a project that will cost hundreds of millions of dollars and will require financial help from the Quebec government. <p>In the face of the new emissions cap, Glencore Canada said it "remains committed to achieving the most ambitious goals possible." "Our teams and our partners are fully mobilized around a major transformation project," Cindy Caouette, a company spokesperson, said in a statement. [CBC News, 15/05/2019, "Children living near Rouyn-Noranda, Que., smelter overexposed to arsenic and lead, study shows": cbc.ca] [CBC News, 06/07/2022: cbc.ca] [CBC News, 16/08/2022: cbc.ca] [Financial Post, 10/08/2022: financialpost.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: Glencore reiterated the smelter has many concrete plans to reduce emissions to the "lowest levels" it can, but never addressed the impacts that the emissions have on the environment and the lives and livelihoods of people. <p>Overall, the company responded in very general terms and did not address the allegations in detail. The company provided feedback for this indicator, however it was not material for the assessment.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(8).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"> • Met: Engaged with stakeholders: In November 2022, Glencore organized a first information meeting with the local residents to presented their "express modernization plan" to lower the plant's toxic emissions, including those of arsenic, a carcinogenic substance. [Le Monde, 29/09/2022, "In Quebec, the brutal awakening of a city poisoned by its foundryIn Quebec, the brutal awakening of a city poisoned by its foundry": lemonde.fr] • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: On 29 August 2022, Glencore released Part III of its environmental improvement plan for the Horne Smelter. In the report, the company shared that preliminary reports indicated a reduction of emissions by nearly 20%. The company also lays out its project timeline and goals for further reducing emissions in the area. [Horne Smelter Environment Plan - Part III Section 8.5 of the Remediation Certificate, 29/08/2022: glencore.ca] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies. The Company provided feedback to this indicator. However, no publicly available statemetrn could be found on how affected stakeholder voices provided input to the steps taken by the company.
E(8).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: There is no evidence suggesting the company provided remedy to the affected stakeholders. • 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

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