# GLENCORE

**Human Rights
Report 2019**

Our commitment to human rights

Our commitment

We uphold the dignity, fundamental freedoms and human rights of our people, communities and others potentially affected by our activities. We are committed to implementing the United Nations (UN) Guiding Principles on Business and Human Rights and uphold the UN Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We support the UN Global Compact and follow the principles set out in OECD Guidelines for Multinational Enterprises. These commitments are reinforced in our Code of Conduct and Group Human Rights Policy.

Further information on our management of human rights and grievance mechanisms is available in Our Approach to Sustainability, our Sustainability Report and our Supplier Standards.
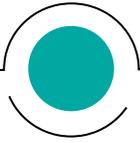
We believe it is important to keep our stakeholders around the world informed about the development of our human rights programme and report transparently on our progress.

This report details our approach to human rights and our key activities and learnings during 2019. It also provides an overview of the human rights risks that are salient to our Group, and how we manage those risks.

Ivan Glasenberg, CEO

At Glencore, we uphold the human rights of our people, communities and others potentially affected by our activities. Responsibility is one of our core values; we talk and listen to others to understand what they expect from us, and take responsibility for our actions. Everyone working with Glencore is required to demonstrate respect for human rights, regardless of their role or location. There are no exceptions.

Contents

Glencore human rights timeline

2013
Included human rights as a material topic in our Sustainability Report

2014
Issued a standalone Group Human Rights Policy

2015
Joined the Plenary of the Voluntary Principles on Security and Human Rights

2017
Included community relations and human rights as a principal risk to the business in our Annual Report

2018
Human rights training for each commodity head from the industrial mining assets

First standalone Human Rights Report

2019
Independent human rights review at Antapaccay

Supplier Standards published

Workshops on security and human rights in Africa and South America

Introduction

**At Glencore, our purpose is to responsibly source the commodities that advance everyday life.
As one of the world's largest natural resource companies, we recognise our potential to impact human rights either directly through our operations or through our relationships with joint ventures, contractors and suppliers.**

We are committed to respecting human rights and actively support our employees and business partners to understand and help us meet this commitment.

Our values, Code of Conduct, Group Human Rights Policy and supporting processes establish a solid foundation on which we can further embed respect for human rights across our business. We are committed to identifying, understanding, and managing our human rights challenges.

This report, Glencore's second Human Rights Report, details our approach to human rights and our key activities in 2019. It summarises the human rights risks that are most salient to our Group and describes our response to challenges related to those risks.

We determine our most salient human rights risks in line with the UN Guiding Principles Reporting Framework. Our most salient risks are those where our business activities could have the most severe negative impact on human rights.

Glencore operates in 35 countries. Some of our assets are in challenging socio-political environments, which may increase the risk our business activities contribute to negative human rights impacts. On the other hand, by being present in these regions, we have an opportunity to advance human rights by, for example, providing access to decent, and safe, work, and contributing to initiatives that support higher living standards such as supporting local entrepreneurs and businesses.

Identifying the nature and potential impact of human rights risks requires ongoing assessment and collaborative efforts across our business. We are committed to transparent and constructive engagement with all stakeholders to share our successes, our challenges and understand how we can further improve our approach to human rights.

In recent years, we have made significant progress in our approach to human rights. Highlights include identifying our most salient human rights risks, raising awareness of human rights in our business through targeted training sessions and, in line with our commitment to transparency, providing more information on our approach to human rights in our human rights report.

We still have a lot to learn. Identifying and managing human rights risks across different geographies and cultures is a complex and challenging endeavour. Expectations for companies to demonstrate respect for human rights are evolving rapidly and our company, and our industry, continues to work on implementing effective processes to improve our performance.

Incident reporting and investigation is a key focus area for our human rights programme and we have identified challenges on how to assess and treat events that occur outside of our immediate operations.

I have asked the Group HSEC team to work with our business, our peers and external stakeholders to review and strengthen our current approach.

We are confident our dedicated approach to human rights is making a positive impact in the communities where we operate.

As we release this report, the COVID-19 pandemic is affecting the health and livelihoods of people around the world including our workforce, communities and business partners. We are prioritising the health and well-being of our people and local communities during this challenging period.

We take our responsibility to respect human rights seriously; it is our ambition to uphold and promote respect for human rights within the Group and throughout our value chain to enable the enjoyment of people's basic rights and freedoms.

We hope you find this report informative and welcome your feedback.

Tony Hayward
Chairman

19 June 2020

Our business

We manage 150 industrial sites in 35 countries and more than 30 marketing offices. We employ 160,000 people. We produce and market more than 60 commodities and are active at multiple stages of the commodity value chain

Our industrial business

Our industrial business spans the metals and energy markets, producing more than 60 commodities from 150 sites

Exploration, acquisition and development

Our focus on brownfield sites and exploration close to existing assets lowers our risk profile and lets us use existing infrastructure, realise synergies and control costs.

Extraction and production

We mine and beneficiate minerals across a range of commodities, mining techniques and countries, for processing or refining at our own facilities, or for sale.

Processing and refining

Our expertise and technological advancement in processing and refining mean we can optimise our end products to suit a wider customer base and provide security of supply as well as valuable market knowledge.

This report includes information from our industrial and marketing activities, including only assets where we have operational control.

Geographic arbitrage

Product arbitrage

Time arbitrage

Our marketing business

We move commodities
from where they are plentiful
to where they are needed

Our commodities in everyday products

Logistics and delivery

Our logistics assets allow us to handle large volumes of commodities, both to fulfil our obligations and to take advantage of demand and supply imbalances. These value added services make us a preferred counterparty for customers without such capabilities.

Blending and optimisation

Our ability to blend and optimise allows us to offer a wide range of product specifications, resulting in a high-quality service and an ability to meet our customer specific requirements.

Our diversity by geography, product and activity helps us to maximise the value we create for our business and our stakeholders.

Global Scale

35 countries

30 offices

150 sites

160,000 people

Highly diversified

60+ commodities

2 business segments

Our approach

Our approach

In our Code of Conduct we state our commitment to respect human rights in a manner consistent with the Universal Declaration of Human Rights. Everyone working for Glencore, regardless of location or role, must comply with our Code of Conduct. We expect each commodity department to embed respect for human rights. Our senior managers in each commodity department are responsible for identifying and managing human rights risks and potential impacts.

Related external commitments

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- International Labour Organization Core Conventions
- Voluntary Principles on Security and Human Rights
- International Council on Mining and Metals
- Extractives Industry Transparency Initiative
- UN Global Compact

In 2019, we hired a new Group General Manager who is responsible for overseeing the implementation of our Group Human Rights Policy across the business and a Responsible Sourcing Manager who is responsible for our human rights due diligence programme for metals, minerals and energy products.

Risk management is one of the primary responsibilities of the Board and its Committees and is critical to the decision making process across the business. In our 2019 Annual Report, we disclosed community relations and human rights as a principal risk for Glencore linked to our strategic priority to integrate sustainability throughout our business. The Board, through its Health, Safety, Environment and Communities (HSEC) Committee, provides oversight of the management of community and human rights issues. In 2019, this included security incident reviews in Peru and smelter emissions at Mopani.

To support consistency across the group, our risk management framework establishes a common approach for identifying, assessing and monitoring risks. We have been working on embedding human rights considerations into our risk-based approach and are engaging with our leadership teams to achieve this. In 2019, our Head of Industrial Assets led two meetings with the heads of each commodity department during which they discussed key human rights risks and how to recognise and manage human rights risks in the Group.

Each commodity department is expected to adhere to our Group policies. Our Group policies are underpinned by our values and Code of Conduct and detail the behaviour and performance expectations for all assets and offices where we have operational control. Assets tailor the implementation of Group polices to ensure local cultures, challenges and opportunities are reflected while meeting the expectations captured in the policies.

Our Group Human Rights Policy captures the minimum requirements related to human rights. We require our assets to:

- Identify and assess risks of human rights impacts;

- Develop adequate controls to prevent, mitigate or remediate adverse human rights impacts;

- Conduct systematic engagement and consultation with affected groups to enable their meaningful participation in decisions affecting them;

- Set up and maintain effective grievance and/or complaints mechanisms;

- Take steps to ensure business partners demonstrate respect for human rights;

- Set up monitoring and review processes to meet the requirements of the Group Human Rights Policy; and

- Implement risk controls and corrective actions, whenever relevant, to continually improve human rights performance.

If assets have caused or contributed to an adverse human rights impact they are required to report the incident internally and provide or participate in effective remediation, giving particular attention to vulnerable and previously disadvantaged groups.

As part of our HSEC and Human Rights assurance model every site completes a self-assessment against the Group policies each year. The commodity departments are expected to use the results of these self-assessments to inform their annual HSEC risk assessment and planning processes.

Related policies and guidelines

- Code of Conduct

- Group Human Rights Policy

- Community and Stakeholder Engagement Policy

- Health and Safety Policy

- Environmental Policy

- Supplier Standards

- Implementing the Voluntary Principles on Security and Human Rights Guideline

- Community Complaints and Grievances Guideline

We demonstrate respect for human rights and seek to manage human rights risks at each stage of our business and, for industrial assets, at every stage of the project lifecycle from exploration through to closure.

Respecting human rights during project development

Glencore's Aurukun Bauxite Project (the "Project") is conducting studies to assess the viability of developing a bauxite mine on the traditional lands of the Wik Waya people in Queensland, Australia.

The Native Title rights of the Wik and Wik Waya people were first formally recognised under Australian law in 2000. The Queensland Government subsequently recognised the Aboriginal freehold rights. These rights are held, on behalf of the Traditional Owners, by Ngan Aak-Kunch Aboriginal Corporation (NAK).

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.

Any future development of the resource requires government and regulatory approvals in addition to agreement from the affected Wik Waya families. Our approach is fully aligned with the principles of Free, Prior and Informed Consent of Indigenous Peoples and consistent with International Council on Mining and Metals' (ICMM) *Indigenous Peoples and Mining Position Statement*.

The Project designed the engagement process with the Traditional Owners to:

- Keep them fully informed about the Project and its potential impacts and benefits;
- Enable them to make decisions freely without coercion, intimidation or manipulation; and
- Give them sufficient time to contribute to project decisions and discuss ways to maximise opportunities and minimise potential impacts.

In July 2019, as part of this process, NAK and Wik Waya families endorsed a working group model in which:

- Traditional Owners, Native Title Holders and Glencore can:
  - Exchange information and identify opportunities relating to the Project;
  - Progress negotiations and discussion in relation to development of agreement; and
  - Work together to develop procedures and processes to ensure cultural heritage is managed appropriately
- Traditional Owners and Native Title Holders can ensure their cultural obligations and needs can be met; and
- Advice, guidance and recommendations can be provided by Traditional Owners to both Glencore and NAK in connection with the Project.

NAK and Wik Waya families nominated representatives to sit on a working group, which met for the first time in September 2019. The working group has two co-chairs (one Wik Waya representative and one from Glencore) and is in the process of appointing an independent observer.

Working group discussions have been constructive to date as all parties seek to understand each other and the Project better. In December 2019, the working group agreed to appoint a specialist with strong community and anthropological experience to work with Wik Waya families to understand more about Traditional Owner aspirations and concerns around any development. Glencore provided the working group with a summary of its environmental fieldwork and agreed to help Traditional Owners obtain an independent review of the Environmental Impact Statement when it is ready. Traditional Owners participated the fieldwork helping with water quality monitoring and sample collection.

The working group is continuing to meet regularly in 2020.

We want to have a true partnership

"Glencore knows how important our connection to country is to our people, any discussions about country needs to be done directly with us as the directly affected Traditional Owners of the land. No decisions about future mining will happen without our consent. We have a good relationship with Glencore but if a mine is to proceed we need to make sure the foundation of that relationship is there for the long term. We don't want a situation where we might agree to mining then we become separate. We want to have a true partnership for what happens on our country now and into the future".

Loyla Chevathen,
Wik-Waya Traditional Owner of the project area

Minimising the human rights impacts of mine closure

Raglan Mine in northern Quebec became the first mining operation in Canada to enter into an Impact and Benefit Agreement with an Aboriginal group in 1995. Even though the mine is expected to operate for at least another 20 years, it became clear through discussions with our Inuit partners that they have concerns related to mine closure practices, including tailings management.

In Quebéc, mining operations are required to review their mine closure plan every five years. To address the concerns of our Inuit partners, Raglan Mine invited members from the host communities to participate in the mine closure planning process.

A Closure Plan Subcommittee (the Subcommittee) was created to establish and maintain a dialogue with the mine's Inuit partners about mine closure and to integrate their traditional knowledge into Raglan Mine's closure plan. The objectives of the Subcommittee are to safeguard Inuit land use, resources and ecological integrity; create benefits and build capacity in local Inuit communities; and ensure the transfer of skills, knowledge and values between Inuit and industry to ensure efficient, safe and long-term solutions to closure and remediation at Raglan Mine.

As of December 2019, the Subcommittee had reviewed, and suggested improvements for, approximately half of the closure plan. Other accomplishments in 2019 included:

- Working with TERRE-NET (Network Towards Environmentally Responsible Resource Extraction) graduate students at Memorial University to develop research on community engagement and compare mine closure plans across Northern Canada to inform the Subcommittee, and

- The development of a mine reclamation program at Université du Québec en Abitibi-Témiscamingue to teach and engage community members on mine reclamation.
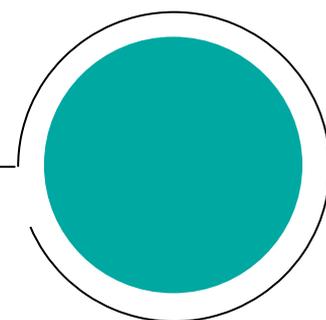
The key processes that support our human rights programmes

Process	Objectives	Key Group activities in 2019
Risk management	• Identify, assess, manage and mitigate human rights risks	• New transport protocol • Fatality reduction programme • Independent human rights review at Antapaccay, link
Community and stakeholder engagement	• 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	• Implementation of new social and human rights incident reporting process
Due diligence	• Identify and manage human rights risks in our business partners	• Implementation of the Supplier Standards
Grievance and complaints mechanisms Note: Neither Glencore's Raising Concerns platform nor local grievance mechanisms impede access to judicial or administrative remedies. Glencore cooperates with state-based non-judicial grievance mechanisms.	• Provide at least one channel for stakeholders to raise and seek redress for impacts to their human rights (can include dedicated phone lines, registers in public places, SMS hotlines or community offices)	• Progressed a review of internal guidance to reflect new ICMM guidance *Handling and Resolving Local – Level Concerns and Grievances*
Monitoring and evaluation (incl. audit)	• Review the effectiveness of human rights activities to continually improve human rights performance	• Implementation of new social and human rights incident reporting process
Training	• Build a consistent understanding amongst the workforce on the importance of respecting human rights • Provide guidance to the workforce, including management personnel, on our expectations for demonstrating respect for human rights including how to implement and monitor human rights management controls	• Workshops on security and human rights in Africa and South America

Progress in 2019

Overview

In 2019, we focused on four programmes of work to improve our human rights processes and performance:

1. Supply chain due diligence
2. Training
3. Grievance mechanisms review
4. Incident reporting and investigation

1. **Supply chain due diligence:** Articulating our expectations for our suppliers on human rights and assessing the extent to which suppliers meet those expectations.
2. **Training:** Refreshing our human rights training programme.
3. **Grievance mechanisms review:** Aligning our guidance for industrial assets on complaints and grievances with the new ICMM guidance.
4. **Incident reporting and investigation:** Monitoring our new social and human rights incident reporting process

1. Supply chain due diligence: We published our Supplier Standards (the Standards) in March 2019 and started to work with commodity department teams to embed the Standards into our contracts and update tools and processes to reflect the enhanced due diligence expectations. This work is ongoing.

As our business is diverse and different commodity departments and geographic regions are exposed to varied risks within complex supply chains, we took a phased approach for implementation. The corporate team worked with individual commodity departments to minimise disruption to existing processes while implementing the changes. This approach also allowed us to learn and adapt as we expanded the implementation.

Some highlights from 2019 are reflected below:

Australia: Australia was a priority region for us to embed the Standards. Most of our commodity departments have operations in Australia and implementing the Standards is a critical part of adhering to Australia's new Modern Slavery Act. The presence of multiple commodity departments also created an opportunity for a coordinated roll-out that would minimise the impact on our suppliers in the region. Our standard contract clauses have been updated to reflect the Standards, and since implementation in mid-2019, we evaluated over 400 supplier self-assessments against the Standards during pre-qualification and tendering. A shared database accessible by all Australian commodity departments captures the self-assessment results. This ensures suppliers are only required to complete an assessment once prior to acceptance (or rejection) by all Glencore Australia operations, and results of any assessment are immediately visible to all Glencore Australian operations.

Ferroalloys: Relationship management is key to our procurement approach. Prior to updating the standard terms and conditions of procurement, contract terms and launching enhanced due diligence to reflect the Standards, our teams hosted two engagement sessions for over 200 business partners. The Ferroalloys executive team, led by Ferroalloys CEO Japie Fullard, presented the expectations captured in the Standards and the supporting due diligence process. We implemented the Voluntary Principles in South Africa in 2019 and utilised this opportunity to communicate our commitment to the Voluntary Principles to our business partners and share our specific expectations for our private security service providers to align their security management practices with the Voluntary Principles. We received positive feedback with no business partners or private security service providers raising any major concerns about our expectations.

Coal South Africa: The procurement team in our South African Coal operations updated its vendor application process in 2019 to incorporate the Standards. New vendors are required to acknowledge the Standards and may need to complete self-assessments against the Standards, which are reviewed by the local team prior to any further engagement with the vendor. Since implementation in mid-2019 the team screened 66 new vendors. In addition, the team screened 46 existing, high-risk tier one vendors. As a result of the self-assessments, the local team requested one supplier to confirm actions taken to implement a human rights policy in order to work with Coal South Africa. In 2020, the team will start to screen existing vendors, in addition to new vendors.

Marketing: We are in the process of embedding the Standards into our commodity department's marketing teams. Our due diligence approach aligns with the recommendations of the OECD Due Diligence Guideline for Responsible Supply Chain of Minerals from Conflict-Affected and High Risk Areas. In 2019 we trialled our due diligence process through pilot assessments with some of our cobalt and ferrochrome suppliers. In 2020, the process will be extended more broadly across our marketing departments.

In 2020 we will continue to implement and manage the enhanced human rights due diligence across the business. To support this, we are developing a global technology platform.

2. **Training:** In 2019, we reviewed our human rights training programme. Recognising inconsistent security-related performance across the Group we prioritised a refresh of human rights and security training. To inform the training needs we engaged assets across the business on the scope, frequency and audience for existing security training. We subsequently developed a three-day training workshop with the support of third-party security and human rights specialists to build a stronger understanding of the risks related to security and human rights and share learnings and best practices to effectively manage the risks.

Specifically the training was designed to:

• Assess implementation progress of the Security Standard, identify challenges or areas of misunderstanding
• Understand the changing risks related to security and human rights
• Review the requirements of the Voluntary Principles on Security and Human Rights
• Identify opportunities to improve human rights security training across the Group
• Build a network of security professionals across the Group and share knowledge
• Agree how Group teams can best support commodity departments and sites

In 2019, we ran two training sessions, one in South Africa and one in Colombia, for almost 70 general, security, community, and corporate affairs managers in the regions. Participants provided feedback the training was extremely valuable.

In 2020, we will continue to review and enhance our human rights training programmes across the Group.

3. **Grievance mechanisms review:** In November 2019, the ICMM issued new guidance *Handling and Resolving Local – Level Concerns and Grievances*. We are in the process of updating our internal guidance in line with the ICMM's and are preparing an internal campaign to improve awareness of both sets of guidance materials and reinforce our expectations in 2020.

In parallel, we also started to design a targeted review of our Group and local grievance mechanisms. While the review officially started in 2020, preliminary engagement with the operations has identified some inconsistencies in performance of grievance mechanisms at our operations.

Human rights in commodity trading

Between 2017 and 2018, we participated in the multi-stakeholder advisory group, led by the Swiss government, which developed guidance for the commodity sector on implementing the UN Guiding Principles.

In 2019, we hosted a workshop with representatives from the Swiss government, civil society, banking, trading companies and our colleagues from our responsible sourcing and communications teams. The objective of the workshop was to identify, discuss and address challenges and opportunities in human rights reporting, a key element of the UN Guiding Principles, in the commodity trading sector. The participants engaged in a constructive discussion that outlined the challenges of human rights reporting in the sector, feedback on our 2018 Human Rights Report. Participants provided the following recommendations to enhance our reporting going forward:

· Be clear on targets and goals on impacts
· Aim to provide quantitative data to demonstrate performance and progress
· Demonstrate how our trading activities are captured in our approach/activities
· Explain what we are doing to minimise our human rights impacts
· Continue to manage targeted engagement plans with key stakeholders
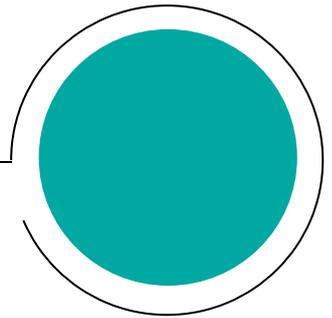
4. **Incident reporting and investigation:** In 2019, we rolled out a new process for reporting social and human rights incidents. We designed the process to align with our existing health and safety incident reporting process, which is well understood across the Group.

In 2019, 10 incidents were reported to the Board HSEC Committee including incidents related to community unrest, traffic incidents and trespassers. Of those, two tragically resulted in multiple fatalities. In the first, twenty-one people lost their lives and others have life-changing injuries as a result of a traffic accident in the Kabwe village near Kolwezi, DRC. The incident involved a sub-contracted tanker loaded with sulphuric acid destined for Mutanda Mining Sarl (Mumi). The second incident resulted in multiple fatalities and injuries of trespassing artisanal and small-scale mining (ASM) miners who were operating illegally at Kamoto Copper Company (KCC). These miners had developed, and were working, two galleries (underground tunnels) in benches overlooking the extraction area. Two of these galleries caved in.

While we acknowledge the tragic nature of these incidents and have provided details of both in our public reporting, after considerable internal review we decided not to report these as serious human rights incidents at our operations, because one involved a third party contractor and the second was a result of an illegal intrusion to our KCC operation by ASM miners.

The new process has helped to raise awareness on the importance of tracking, investigating and managing social and human rights incidents. Working with the assets to implement the new process has also helped us to collect questions from our teams on how to effectively define social and human rights incidents. We recognise this is a challenging topic and expectations and best practices are evolving rapidly. We are looking to enhance our human rights training programme by addressing the questions we received.

In 2020, we will continue to monitor social and human rights incidents across the Group and will undertake further work on reporting serious human rights incidents.

Grievance mechanism review

In 2019, our PetroChad (Mangara) (PCM) oil and gas operations updated their Environmental and Social Impact Assessment (ESIA) with support from third party experts. PCM recognises its operations may have negative social or environmental impacts on people near the operating areas. As a result, PCM worked with the experts to review and redefine the original ESIA requirements relating to compensation principles, grievance mechanisms and arrangements (the framework) for people who may be affected by its operations. The framework was developed in accordance with PCM's operational policy on social and environmental protection, and takes into account Chadian legislation and the performance standards for environmental and social sustainability of the International Finance Corporation (IFC). To inform the work the team consulted subject matter experts and conducted a survey of the impacts within the local communities.

Based on the research, the team outlined three compensation methods: in-kind, financial and training. Affected persons or communities will have the opportunity to highlight their preferred compensation method for review. The framework details compensation rates for a variety of potential losses including buildings, cultural sites, crops and domestic animals.

The Chadian Ministry of Environment approved the ESIA following public consultation with local communities and civil associations.

PCM incorporated the updated framework into their existing grievance management process. For example, in 2018, following a berm breach at a water containment area, flooded water passed over local farmland towards a local river. We received a number of complaints from local farmers regarding the damage floodwater did to their crops. In line with PCM's government-approved grievance mechanism and the compensation rates set out in the framework, PCM investigated each case, in the presence of the affected farmers, the village chief and a representative from PCM. Where it was agreed that damage had been caused, the farmers received compensation in line with the framework.

Human rights risk management

Our approach

In 2020, we are developing a dedicated Human Rights Risk Framework (the Framework) to assess the level of human rights risk, and define actions to understand and manage risk exposure, at each of our assets. The Framework will align with the Corporate Risk Management Framework. We plan to validate the Framework at three of our sites with different levels of risk.

Our salient risks

We have identified six salient human rights risks across the Group: labour rights, safety, health, security, inequality and water. Our salient risks assessment considers risks to people. Our material topic assessment considers both impact to business and impact to stakeholders. As a result, our salient risks and our material topics don't align perfectly. We followed a three-step process to determine our salient risks:

1. **Reviewed our experience:** We collated the outcomes of our internal risk management processes, including those from our grievance and complaints mechanisms.

2. **Studied the external landscape:** We considered the typical risks extractive companies are exposed to. We drew input from our peers, the ICMM, the Corporate Human Rights Benchmark, the Business for Social Responsibility and the Principles for Responsible Investment. We developed a country-level risk assessment process based on the Corruptions Perception Index, the Environmental Performance Index, the Global Slavery Index and the Fragile State Index.

3. **Refined the list:** We analysed a 'long list' of potential issues to determine the gravity of each issue's impact, the number of individuals that are/could be affected, and how difficult that issue would be to resolve (in line with UNGP guidance) to select the most salient risks across the Group.

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.

	Industrial business			Marketing business	
	Exploration, acquisition and development	Extraction and production	Processing and refining	Blending and optimisation	Logistics and delivery
Labour Rights	Sub-standard working conditions, slavery, forced labour, child labour, industrial relations, discrimination				
Safety	Injuries and fatalities				
Health	Occupational diseases				
		Dust	SO_2/NOX emissions, hazardous chemicals		
Security	Violence or abuse by private or public security forces				
Inequality	Access to grievance mechanisms Bribery and Corruption				
		Artisanal and Small-Scale Mining Transparency			
Water		Access to water and sanitation			

Labour rights

Our people are fundamental to our success. Our workforce includes 160,000 people in 35 countries around the world and we promote the importance of treating everyone fairly and with respect. We expect our suppliers to share our commitment to respect labour rights.

The success of our business is dependent on attracting and retaining the best talent at every level of the Group. We recognise expectations around work are changing and the rapid pace with which our business and technology is developing requires Glencore to actively prepare our employees for the future of work.

We engage with employees, contractors and unions to create safe working conditions in our operations and support freedom of association and collective representation. In 2019, 71% of our employees were covered by collective bargaining arrangements. We have zero tolerance for any form of modern slavery, including forced, compulsory or child labour.

We believe diversity brings new and innovative ideas to deliver improvements across our business. There are almost 60 nations represented in our workforce. We promote inclusion, fairness and equality and do not discriminate based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, trade union membership, political belief, or any other potential bias.

We provide our workforce with access to healthcare and fair wages.

Related human rights

- Right to just and favourable conditions of work
- Right to desirable work and to join trade unions
- Freedom from discrimination
- Right to rest and leisure
- Right to equality
- Freedom from slavery
- Freedom from child labour

Increasing Indigenous Australian's participation in the workforce

Challenge: Indigenous people are currently under-represented in Australia's workforce, including in the resource sector.

Our response: In Glencore's Australian coal assets, the Cultural Heritage Pathways Program (the Program) seeks to provide real employment connections for Indigenous Australians associated with the geographies of our operations. The Program specifically targets unemployed Indigenous people or those actively seeking employment.

The Program evolved from various existing initiatives. Over 26 weeks, it takes a holistic approach towards providing opportunities to secure employment, as well as covering personal and lifestyle choices in its pre-employment, and work experience phases. Its objective is for participants to secure permanent employment. A key component is the participation of Indigenous mentors from Glencore Coal's workplaces and external cultural mentors from the aboriginal communities.

Glencore Coal consulted with Traditional Owners, other Aboriginal groups and Elders on the structure and content of the Program, who strongly endorsed the approach. There has also been strong support from the Department of Aboriginal and Torres Strait Islander Affairs, the Queensland government's lead agency with regard to Indigenous engagement.

During 2018 and 2019, the pilot run by the Oaky Creek Coal operation demonstrated how the Programme could lead to a new normal, enabling positive lifestyle changes and work attitudes. The pilot had twelve participants, eight of which secured permanent employment at the end of the training period with employers associated with Oaky Creek Coal.

In 2020, two Queensland programmes are supporting 20 participants and 15 are in the Upper Hunter programme. Site-based and external mentors assist participants over the full 26 weeks.

Our copper and zinc assets operations in Australia run similar programmes to encourage the participation of indigenous people in the workforce.

2020 Actions

Continue to investigate opportunities to improve gender diversity

Safety

Safety is one of Glencore's values. We are committed to creating safe working conditions for the 160,000 people who work for us. Everyone working for Glencore is responsible for helping to keep our workplace free of fatalities and injuries. We also identify, and take actions to address, any situations where our operations may affect the safety of our surrounding communities.

We also expect our business partners to take the necessary responsibility and actions for maintaining safe workplaces.

Related human rights

- Right to life
- Right to just and favourable conditions of work

Performance

| Fatalities	TRIFR	LTIFR
17	**2.86**	**0.99**
2018: 13	2018: 3.18	2018: 1.06
2017: 9	2017: 3.08	2017: 1.02

Workplace safety

Challenge: Achieving a consistent safety performance at every one of Glencore's assets is challenging due to our geographic, commodity, and operational diversity. Tragically, there were 17 fatalities at our managed operations in 2019.

Our response: Any loss of life in workplace incidents is unacceptable and we are determined to eliminate fatalities across our business. In 2019, we launched three work streams to reduce the risk of further fatalities across the Group.

SafeWork review: We identified ten assets with the weakest safety performance for a deep dive assessment on the implementation of our safety management system, SafeWork. The reviews are designed in workshops with the leadership team, and assess organisational development and leadership, SafeWork leadership and tools, compliance with our standards, and the effectiveness of assurance and verification programmes.

Kazzinc intervention: Between 2016 and 2019, nine people died at our Kazzinc operations in Kazakhstan. To improve our safety performance we established a multi-disciplinary, cross-commodity fatality intervention team. Over a four-week period, the team, accompanied by site general managers, visited every location in every operation to assess operating processes and, if necessary, close activities with unsafe conditions. Team members consolidated and reported findings daily to identify patterns and associated actions quickly. The Kazzinc management team is focusing on closing out findings, verifying corrective actions, addressing high potential risk incidents and preparing for a second phase of review in 2020. The fatality intervention has already resulted in safer plant, equipment and behaviours and has created a shared understanding of how to deliver safe and stable operations and a clear action plan to take forward.

Safety case presentations: A majority of the fatalities in 2019 occurred at zinc and copper assets. At the request of the Board HSEC Committee, the zinc and copper departments both prepared and presented detailed safety cases. Each safety case describes the steps being taken to identify and understand hazards and to apply controls consistently and effectively. They also include reviews on organisational capability, operational performance and SafeWork systems and processes. Both departments are required to present on progress during 2020.
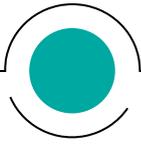
Transport safety

Challenge: In February 2019, twenty-one people lost their lives and others have life-changing injuries as a result of a traffic accident in the Kabwe village near Kolwezi, DRC. The incident involved a sub-contracted tanker loaded with sulphuric acid destined for Mumi. The contractor is an independent trucking company that supplies acid to mining companies.

Our response: Immediately following the incident Mumi assisted the contractor to respond to the incident with equipment and personnel. Mumi also provided guidance and technical support during the remediation activities.

Mumi worked with the contractor to identify the root causes of the accident. The learnings were captured and appropriate measures put in place to avoid a repeat of this incident.

Internally, the incident prompted a review of our Road Transportation Protocol. We convened two workshops for approximately 80 experts across the business to ensure our requirements are clear and fit for purpose. The workshops identified a series of improvements and we are rolling out the updated protocol in 2020 across our global operations and marketing divisions.

Safe treatment of waste

Challenge: In 2019, our assets, including non-operated joint ventures, monitored and maintained 215 tailings dams walls corresponding to 126 Tailings Storage Facilities (TSFs). Potential failure of a dam wall is the greatest risk to our TSFs. A sudden catastrophic failure could jeopardise the safety, environment and livelihoods of our workforce and surrounding communities.

Our response: We are committed to managing the waste generated from our mining activities responsibly. Internally we have a dedicated, specialist corporate dam integrity and safety assurance programme. Externally we engage actively with the global tailings review, a forum co-convened by the ICMM, the United Nations Environment Programme and the Principles for Responsible Investment to establish an international standard (Global Tailings Standard) for the safe management of TSFs.

In September 2019, we convened a global TSFs workshop for 70 of our senior management and technical professionals to strengthen our approach on TSFs management. In consultations with internal and external experts, the workshop reviewed and updated our existing TSFs Management Protocol to reflect learnings from both across the business and industry.

We align our TSFs management with the Canadian Dam Association's Dam Safety Guidelines, which is currently considered one of the leading international guidelines for tailings dam design, operations and management. We require our assets to conduct regular surveillance of TSFs, organise periodic dam safety inspections by external engineers and complete dam safety audits by a leading external provider. In addition, we require our assets to engage regularly with their communities on local TSFs, as well as maintain and communicate emergency response plans with key stakeholders.

In 2020, we expect the new, Global Tailings Standard to be published and will work to ensure our assets are in line with any additional guidance.

2020 Actions

- Implement a group-wide fatality reduction programme including 1. Accelerating SafeWork's implementation, 2. Improving the quality of investigations and knowledge sharing, 3. Presenting safety cases to the Board HSEC Committee by poor-performing commodity departments and 4. Improving reporting to the Board HSEC Committee on fatal and catastrophic risk assurance
- Implement updated Road Transportation Protocol
- Review our TSFs management approach in consideration of the new Global Tailings Standard
- Continue to upgrade the design of our existing TSFs to meet extreme flood and seismic events as specified in our updated TSFs Management Protocol

Health

We believe it is our responsibility to eliminate or control our workforce's exposure to any material or substance that may cause harm or occupational diseases. In 2019, we recorded an increased number of new occupational diseases due to improved identification of and reporting on occupational diseases, particularly malaria.

Performance

New occupational disease-cases

106

2018: 32
2017: 46

We also consider the potential health effects of our operations on local communities and take actions to address them. This is especially important in our host communities with limited access to quality, affordable healthcare. We operate in four countries whose access to essential health services are rated below the global average (66).

Related human rights

- Right to health
- Right to safe drinking water and sanitation
- Right to an adequate standard of living

Universal health coverage (UHC) service coverage index 2017

Chad	28
Democratic Republic of Congo	41
Zambia	53
Philippines	61
Global average	66

Source: Tracking universal health coverage: 2019 Global Monitoring Report. Geneva, WHO 2019.
http://www.who.int/healthinfo/universal_health_coverage/report/2019/en/
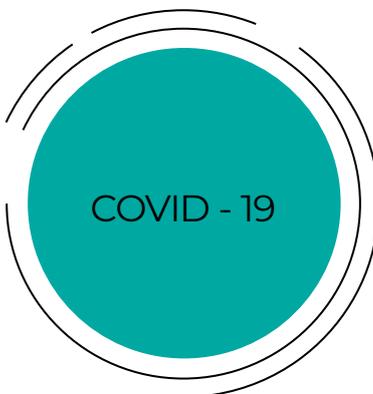
COVID - 19

On March 11, 2020 the World Health Organization declared the novel coronavirus (COVID-19) outbreak a global pandemic. Looking after the health of our workforce and communities has been our top priority during the COVID-19 Pandemic and we implemented various control measures to limit COVID-19 in our workforce including:

- Testing and screening
- Asset access and transportation
- Hygiene and social distancing

We recognise many of the communities where we operate are facing extraordinary socio-economic hardship as a result of COVID-19. In April 2020, we launched a US$ 25 million Glencore Community Support Fund as part of our commitment to protect the wellbeing of the people in our host communities.

At the time of publication the COVID-19 pandemic, and any associated impacts to our people and communities, is ongoing.

Sulphur dioxide (SO_2) emission in Zambia

Challenge: The Mopani smelter was shut in June 2019 for upgrades to the infrastructure. When the smelter shuts down, for example for maintenance, there is typically a short surge in SO_2 emissions when it restarts. SO_2 emissions may have adverse health impacts on vulnerable groups such as children and people with pre-existing respiratory conditions.

Our response: During the shutdown, Mopani introduced enhanced operational controls to monitor emissions and take actions in case of an exceedance. Experts from our global operations supported the local team before, during and after the restart to share best practice controls and train the local team.

In addition, the local team prepared an integrated stakeholder engagement and communications strategy to support the smooth restart of the smelter. Mopani's approach to the restart was based on an assessment of the potential impacts of SO_2 emissions on surrounding communities, focusing particularly on at-risk populations (children, elderly, chronically ill). The team engaged extensively with local stakeholders to develop and implement restart plans. In preparation and support of the restart the following activities were completed:

- Real time monitoring – 15 additional monitors were installed on the boundary of the smelter and a further eleven in nearby communities. A further seven monitors were installed inside the fence to detect any escalation before it reaches the boundary. The monitors provide real-time information to the Air Quality Control team at the smelter who monitor the data and take action accordingly (ranging from reporting and investigation to stopping the plant). The team reviewed and updated a Trigger Action Response Plan which outlines the appropriate action to take based on the level of exceedance.

- SO_2 exceedance training – community representatives received training on actions to take in the event of an SO_2 exceedance and leaflets on how to respond were also distributed throughout local communities. The local team identified vulnerable people in the proximity of the site and made sure they knew what to do and where to go if they feel unwell during an exceedance. Mopani's medical team worked with public hospital and health clinics to upgrade their facilities and resources to ensure they can provide quality care in the event of an SO_2 exceedance.

We believe the measures taken were well received by the local communities.

2020 Actions

- Review our health policy and standards to safeguard the health of our workforce and local communities
- Continue to review the effectiveness of our COVID 19 control measures and adjust as necessary

Security

We develop and manage various approaches to safeguard our people, assets and products. 68 Glencore assets, including assets in five countries with high or extreme security risks (reference table), employ security personnel and/or private security contractors. We manage our security-related activities in line with the country's legal framework.

There is high potential for human rights violations in security related activities if appropriate controls are not in place. Our Security Standard details process and behavioural requirements for security teams and is aligned with the Voluntary Principles. Our assets provide training to both directly employed and contracted security officers and engage host governments and local communities on the impact of security arrangements. We require all contracted security personnel to adhere with our Supplier Standards, including demonstrating respect for human rights. When assets are located in areas with a high-risk of security related human rights impacts we apply the Voluntary Principles framework to strengthen our approach to security management. We have formally implemented the Voluntary Principles in Chad, Colombia, the DRC, Peru and South Africa.

Related human rights

- Right to life, liberty and security
- Freedom from arbitrary detention
- Freedom from torture or cruel, inhuman or degrading treatment

Security risk forecast – Control Risks RiskMap 2020

Country	Risk Forecast
Chad	Medium to High
Colombia	Medium to High
Democratic Republic of Congo	Medium to Extreme
Peru	Medium to High
Philippines	Medium to High

Source: Control Risks RiskMap 2020
https://www.controlrisks.com/-/media/corporate/files/riskmap/maps/riskmap-map-2020-a1-eng-web.pdf

Engagement on security and human rights

Glencore has been a member of the Voluntary Principles Initiative since 2015. As part of our engagement, we actively participate in in-country working groups in Peru (Lima and Cusco), the DRC (Lubumbashi) and the United Kingdom. These working groups were developed to address security and human rights challenges in complex environments. Whilst the objectives may vary slightly for each group they broadly intend to:

- Create a space for dialogue on security and human rights between the state, companies and civil society;

- Promote the discussion and dissemination of good practices and lessons learned on international standards on security and human rights;

- Define and guide the process of implementing the Voluntary Principles, and

- Conduct advocacy activities in favour of adequate policies on security and human rights.

Working group participants comprise representatives from government, companies and civil society who are active in the region. We find these working groups are particularly valuable for informing our risk assessments and developing training materials on security and human rights.

In Colombia, we have been members of the Comité Minero Energético (CME) since 2017. The CME is a multi-stakeholder platform for dialogue and collaboration dedicated to improving human rights performance in relation to security in business environments in Colombia.

Kamoto Copper Company (KCC), Democratic Republic of Congo

Challenge: In June 2019, a tragic incident resulted in multiple fatalities and injuries of trespassing artisanal and small-scale mining (ASM) miners who were operating illegally at KCC. These miners had developed, and were working, two galleries (underground tunnels) in benches overlooking the extraction area. Two of these galleries caved in. There was no link between these incidents and KCC's operational activities. Following the incident, DRC armed forces, the Forces Armées de la République Démocratique du Congo (FARDC), independently established a presence in the area. KCC did not request the presence of the FARDC in its operating area; the FARDC was not, nor is, stationed on KCC's mining concession.

Our response: Glencore and KCC are committed to upholding respect for human rights in accordance with the Voluntary Principles. The safety and security of employees, contractors and host communities is of paramount importance to KCC. When KCC became aware that FARDC had been deployed to the area, KCC formally communicated to senior army officials its expectations of the army to operate in accordance with the Voluntary Principles and international human rights standards. This includes the principles relating to the use of proportionate force and provision of medical aid.

KCC is taking steps to prevent further loss of life by strengthening security measures to deter artisanal miners' access to unsafe areas. This includes safely collapsing unstable tunnels, installing concrete barrier fences and working with SAEMAPE (the government agency responsible for supervising and interacting with artisanal miners) to develop programmes to raise awareness of the personal dangers associated with entering deep mining areas and large mobile mining equipment. In addition, it is reviewing its approach to the issue of ASM in the region.

In 2020, we will continue to engage with the relevant stakeholders to minimise the potential of another incident and promote alternative livelihoods (see page 29) .

Peru

Challenge: December 2018 there was a confrontation between a local family group, Antapaccay's security personnel and the employees of its private security contractor. Following an independent review by human rights experts, we recorded this event as a serious human rights incident.

Our response: Glencore and Antapaccay regret this incident. We are committed to respecting human rights in line with the UN Guiding Principles on Business and Human Rights.

In order to build a better understanding of the incident, stakeholder perceptions and concerns about Antapaccay, Glencore engaged external human rights experts to conduct an independent human rights review. To inform the review, the experts met with Antapaccay management, the affected family and representatives from the local community and civil society. A summary of the review results is available on our website.

In response to the incident, we convened a two-day workshop in Lima with representatives from the Group team, our copper department and Antapaccay to reinforce our expectations for embedding human rights into our management approach and operational activities. With the help of external human rights experts, we reviewed the socio-economic and political context in Peru and the implications for demonstrating respect for human rights at our operations. While a number of challenges were identified, including poverty and poor access to infrastructure, the group agreed a combination of short-term actions and long-term programmes to respond to community concerns and deliver a positive impact in the region.

Glencore and Antapaccay broadly agree with the review findings and recommendations and included them in our ongoing approach for assessing and mitigating human rights risks. In view of the recommendations, and building on the workshop findings, Antapaccay has developed an action plan with four key components: capacity, incident reporting, trust and communications. Over the last year, Antapaccay has started to progress a number of activities in line with the plan. Highlights are captured in the following table.

Peru continued

Component	Objective	Selected Antapaccay activities
Capacity	• Identify and address skills and knowledge gaps for Antapaccay's management team, security personnel and security contractors	• Hired a new Human Rights Officer and a Human Rights Compliance Officer • Set up a cross-functional Human Rights Committee to monitor progress against human rights objectives • Conducted training sessions on human rights
Incident reporting	• Review and strengthen social and human rights incident reporting	• Implemented Glencore's new social and human rights incident reporting process • Reviewed and restructured local grievance mechanism process • Strengthened the process for investigating social incidents • Defined social and human rights management indicators
Trust	• Build and improve community trust in Antapaccay • Increase awareness of the grievance mechanisms available to community members	• In the process of reviewing and validating all registered commitments with the communities • Included a formal review of the commitment register in the annual budget process • Held meetings with church representatives, local, district, provincial and regional authorities, media outlets and community members
Communications	• Improving communication with local communities and other relevant stakeholders	• Created dialogue spaces with authorities, local leaders, and community representatives

No human rights incidents were reported at Antapaccay in 2019.

2020 Actions

• Review and update Glencore's Security Standard
• Monitor the implementation of the Voluntary Principles in Chad, Colombia, the DRC, Peru and South Africa
• Continue to work with community groups to ensure human rights are maintained

Inequality

In 2018, UN human rights experts identified inequality as a major threat to human rights worldwide. Inequality is present in all the countries where we operate and, based on the Inequality-adjusted Human Development Index, is contributing to slower social and economic development (see table below). Wherever we operate, we aim to strengthen the communities around us by providing jobs, buying locally, supporting local businesses and investing in social development. All of our assets globally are required to develop a stakeholder engagement strategy that reflects the local context and considers local development requirements. In 2019, 75% of our global procurement spend was with suppliers and contractors local to the countries where we operate and more than 160,000 people benefited from our enterprise development and economic diversification initiatives.

Related human rights

- Right to life, liberty and security
- Freedom from arbitrary detention
- Freedom from torture or cruel, inhuman or degrading treatment
- Right to an adequate standard of living

	Human Development Index 2018	Inequality-adjusted Human Development Index 2018	Overall loss %
Chad	0.40	0.25	37.7
South Africa	0.71	0.46	34.4
Zambia	0.59	0.39	33.4
DRC	0.46	0.32	31.0
Bolivia	0.70	0.53	24.2
Colombia	0.76	0.59	23.1

Source: United Nations Human Development Data http://hdr.undp.org/en/data
1. Overall loss is the percentage difference between the Inequality-adjusted Human Development Index value and the Human Development Index value.
2. Due to rounding, the overall loss percentage may not reflect the absolute figures

Kamoto Copper Company (KCC) artisanal and small-scale mining (ASM)

Challenge: ASM represents an important livelihood and income source for many poverty-affected populations around the world. Some ASM activity takes place near our operations in the Democratic Republic of the Congo (DRC), where people mine cobalt. The sector is largely non-mechanised and informal in nature so it often presents significant risks for safety and human rights, including child labour.

Our response: KCC implements a number of educational and alternate livelihood programmes that seek to reduce the negative impacts of artisanal mining and help transition people into safer and more productive income generation activities.

During 2019, through our school holiday camps, over 16,300 children received a meal each day and participated in a wide range of recreational and educational activities, which included discussions on children's rights, the importance of education and the risks associated with artisanal mining. These camps aim to deter children from engaging in ASM activities during school holidays.

To provide the surrounding communities with alternate livelihoods, we supported over 198 agricultural cooperatives with over 5,350 members with the intent of the cooperatives becoming independent and sustainable in the longer term. One of the small businesses we initiated and developed is now supplying vegetables to our Katanga mine-site canteen and another business is preparing meals for a local mining company. In 2019, 591 individuals were trained to improve their skills for job opportunities and self-employment. We believe developing a long-term, sustainable solution for ASM challenges in the DRC requires a multi-stakeholder approach and we continue to engage with the government and other key stakeholders on the topic.

Community protests in South Africa

Challenge: Many people in South Africa are facing growing socio-economic challenges including record levels of unemployment, poverty, and crime. In 2019, we saw extensive community protests throughout South Africa, including at areas around our operations. At times, these protests forced us to shut down our operations to avoid risk of injury or harassment to our workforce, community members or damage to our equipment.

Our response: We actively engage with the communities around our operations and take steps to strengthen our local relationships; these include:

- Refreshed our stakeholder mapping to reflect new community settlements and representative community organisations
- Revised our approach for local and provincial governments engagement to establish strategic relationships and platforms to discuss progress on social labour plans, social investment and local supplier and enterprise development
- Enhanced stakeholder engagement forums e.g. quarterly meetings between local government delegates and Glencore representatives, collaboration forums with local peers facilitated by the Minerals Council of South Africa
- Our senior managers attend monthly mine crime combatting forum meetings with the South African Police Services
- Improved awareness of our Raising Concerns platform through posters in community centres, libraries, clinics, schools and colleges

In addition, our operations are aiming to reduce community dependency on mining operations through a three-year programme of initiatives including:

- Establishing new local business incubation hubs at our alloys and coal operations to offer free business training to entrepreneurs and build local capacity, knowledge and experience
- Engaging with local entrepreneurs either to provide products and services to our operations or help them build relationships with local and international suppliers
- Promoting farming and agriculture projects aimed at addressing the historical paternalistic approach to community investment and make communities self-sustaining
- Providing certified portable skills training to 1,000 unemployed youths at eight Glencore sites that provide opportunities for the trainees to apply their newly-acquired skills in capital projects

2020 Actions

- Develop a social investment framework to promote a consistent approach across the Group
- Review our approach to ASM to explore avenues to address associated human rights risks

Water

Industrial mining activities can be water intensive and some of our operations are located in water-scarce regions. Using World Resources Institute's (WRI) Aqueduct Water Risk Atlas (Aqueduct 3.0), we identified 41% of our operations, in 14 countries, in regions of "medium – high", "high" or "extremely high" water stress or classified as "arid & low water use". Each of the 14 countries are facing challenges meeting Sustainable Development Goal (SDG) 6: 'Ensure access to water and sanitation for all'. In addition Glencore has operations in five countries considered to be having 'major challenges' meeting the objectives of SDG 6: Bolivia, Chad, Democratic Republic of Congo, Philippines and Zambia. Reflecting this context, we continue to manage water as a salient human rights risk for Glencore.

The table below shows the countries where we have operations and has a baseline water stress level of medium-high or higher and/or has major or significant challenges for meeting SDG 6.

Our operations have established formal processes to identify, investigate and respond to all complaints from our stakeholders. In 2019, we received 16 complaints about water. We also received 18 water-related fines totalling approximately US$841,000. The majority of fines, around US$752,000, were for incidents at Volcan that occurred prior to our acquisition of the asset.

Related human rights

- Right to safe drinking water and sanitation
- Right to an adequate standard of living

2020 Actions

- Enhanced global governance in the areas of water management and biodiversity and land stewardship

Country	Baseline water stress level (WRI)	# of sites	SDG 6 Dashboard	SDG 6 Trend
Argentina	Medium-high	1	Significant challenges	moderately increasing
Australia	Arid & low water use	2	Challanges remain	N.A.
	High	6		
	Medium-high	1		
Bolivia	High	2	Major challenges	moderately increasing
Canada	Medium-high	1	Significant challenges	N.A.
Chad	Low	1	Major challenges	stagnating
Chile	Arid & low water use	2	Challenges remain	on track
Democratic Republic of Congo	Low	2	Major challenges	stagnating
England	Medium-high	1	Challenges remain	on track

∧ on track or maintaining achievement   ⊓ moderately increasing   › stagnating
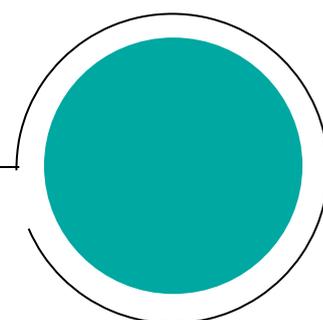
Access to water

Challenge: The Antapaccay operation is located in a region of medium to high water stress and there are long-standing concerns about the availability and quality of water for local communities. The challenge is exacerbated as the local population continues to increase.

Our response: Antapaccay implemented a comprehensive water management system to record and assess water quality trends and water balances. Antapaccay sources 77% of its operational water requirements from recycled/reused water, reducing withdrawals from local sources. Antapaccay also undertakes routine participatory water monitoring with the community at approximately 68 government-approved locations, and developed external training programmes, including community school science programmes, with a focus on responsible water management. It has advanced progressive reclamation efforts of the land and drainage systems in operational areas where mining has finished.

Antapaccay is committed to effectively managing shared water resources and collaborates with local government and nearby communities on several large-scale community water infrastructure projects, including:
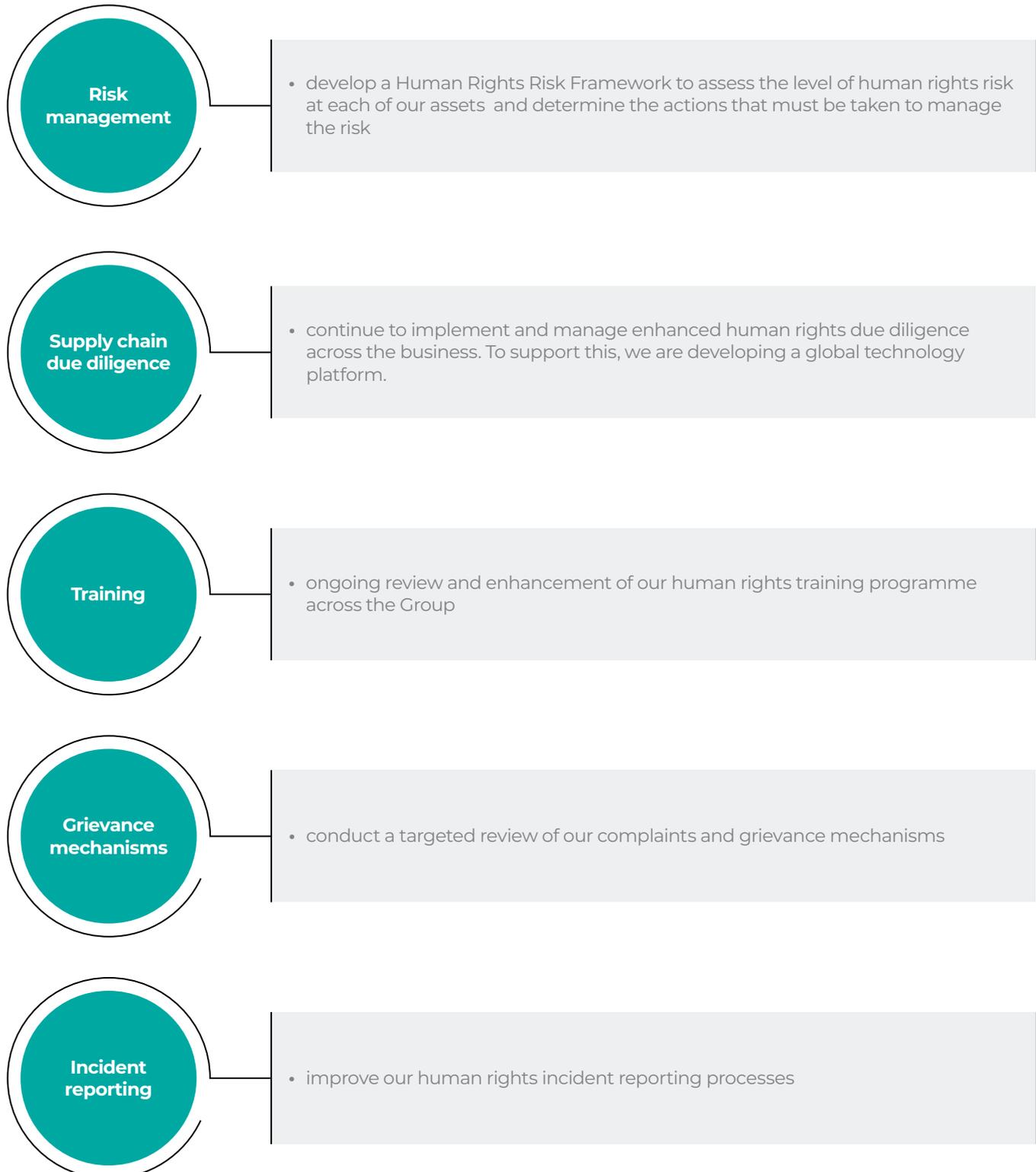
• Installing an irrigation system for managing water for agricultural purposes and constructing a reservoir to collect and distribute rainwater for 10 communities. Antapaccay is engaging with the Provincial Municipality of Espinar, the Ministry of Agriculture and Irrigation, local authorities and the affected communities over the course of the project.

• Responding to the local population's need for improved drinking water and sanitation services, which are currently available for many residents for just two to four hours per day. Feasibility studies are underway to improve an existing dam and Potable Water Treatment Plant and expand water catchment structures by constructing four reservoirs and optimising two existing ones. The project will ensure the adequate collection and disposal of waste water and sewage through the renewal of pipework and expanding connections to residential properties. Antapaccay plans to begin construction in 2021 and complete it in 2023. The project will improve access to water and sanitation for over 57,000 inhabitants.

Country	Baseline water stress level (WRI)	# of sites	SDG 6 Dashboard	SDG 6 Trend
Germany	High	1	Challenges remain	⌃
Italy	Extremely high	2	Challenges remain	⌃
Kazakhstan	High	1	Significant challenges	◗
Peru	Medium-high	1	Significant challenges	◗
Philippines	Low	1	Major challenges	❯
South Africa	Extremely high	1	Significant challenges	◗
	High	20		
Spain	Medium-high	4	Challenges remain	⌃
United States of America	Medium-high	1	Challenges remain	◗
Zambia	Medium-high	1	Major challenges	❯
	Low	2		

2020 next steps

We are committed to ongoing improvement and activities are ongoing across the Group. The next steps, at Group level, for strengthening the integration of human rights across our business and improving human rights performance include the following:

Risk management

- develop a Human Rights Risk Framework to assess the level of human rights risk at each of our assets and determine the actions that must be taken to manage the risk

Supply chain due diligence

- continue to implement and manage enhanced human rights due diligence across the business. To support this, we are developing a global technology platform.

Training

- ongoing review and enhancement of our human rights training programme across the Group

Grievance mechanisms

- conduct a targeted review of our complaints and grievance mechanisms

Incident reporting

- improve our human rights incident reporting processes

Important notice

Important notice concerning this report including forward looking statements

This document contains statements that are, or may be deemed to be, "forward-looking statements" which are prospective in nature. These forward-looking statements may be identified by the use of forward-looking terminology, or the negative thereof such as "outlook", "plans", "expects" or "does not expect", "is expected", "continues", "assumes", "is subject to", "budget", "scheduled", "estimates", "aims", "forecasts", "risks", "intends", "positioned", "predicts", "anticipates" or "does not anticipate", or "believes", or variations of such words or comparable terminology and phrases or statements that certain actions, events or results "may", "could", "should", "shall", "would", "might" or "will" be taken, occur or be achieved.

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For example, our future revenues from our assets, projects or mines will be based, in part, on the market price of the commodity products produced, which may vary significantly from current levels. These may materially affect the timing and feasibility of particular developments. Other factors include (without limitation) the ability to produce and transport products profitably, demand for our products, changes to the assumptions regarding the recoverable value of our tangible and intangible assets, the effect of foreign currency exchange rates on market prices and operating costs, and actions by governmental authorities, such as changes in taxation or regulation, and political uncertainty.

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Likewise, the words "we", "us" and "our" are also used to refer collectively to members of the Group or to those who work for them. These expressions are also used where no useful purpose is served by identifying the particular company or companies.

Sustainability contacts
We welcome feedback on this report or on any other aspect of sustainability at Glencore. Comments can be sent to info@glencore.com **info@glencore.com**

Sustainability online
Further information on the full range of sustainability activities, plus more detailed data on our key sustainability indicators, is available on our website: **glencore.com/sustainability**

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