

**Responsible Supply Chain Due  
Diligence Report 2024  
Kamoto Copper Company S.A.**

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## Kamoto Copper Company S.A. (KCC) - Responsible Supply Chain Due Diligence Report

This report summarizes how Kamoto Copper Company S.A. implements the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) (3<sup>rd</sup> edition) (OECD DDG) (also known as 'step 5 report').

Date of the Report: 21 May 2025

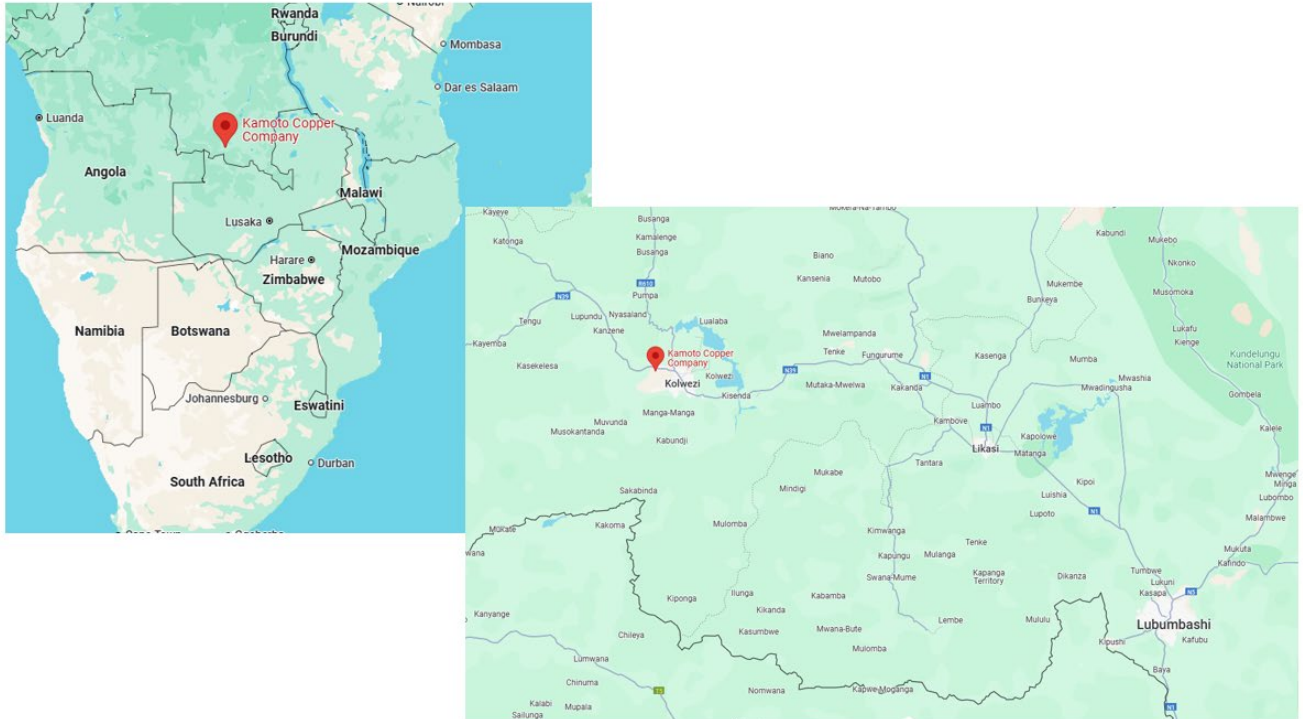
Responsible for this report: Anne-Marie Fleury, Cobalt Responsible Sourcing

Public location of this Report: [Glencore ESG-related publications](#)

### 1 Company information

Company Name	Kamoto Copper Company S.A. (KCC)
Company location	Kolwezi, Democratic Republic of Congo <b>10°42'53"S 25°23'08"E / 10.714798°S 25.385542°E</b>
Description of industrial asset	<p>KCC is a large-scale copper and cobalt producer, active since 2013, west of Kolwezi, Lualaba province, Democratic Republic of Congo (DRC).</p> <p>KCC is a vertically integrated operation carrying out mineral extraction from two open pits and one underground operation and processing to produce copper cathodes and cobalt hydroxide.</p> <p>The annual production in 2024 was 190.6 kt of copper metal and 27.2 kt of cobalt.<sup>1</sup></p> <p>KCC's RMI identification number is CID003261 (cobalt) and CID004394 (copper).</p> <p>Web site: <a href="#">Kamoto Copper Company</a> and <a href="#">Glencore</a> See also: <a href="#">KCC site impressions</a></p>
Metal/mineral material produced	Copper cathodes Cobalt hydroxide
Type of operation	A vertically integrated operation with mineral extraction and processing
Ownership structure, including any subsidiaries	KCC is a joint venture, with 70% held by Katanga Mining Ltd (indirectly wholly owned by <a href="#">Glencore plc</a> ) 20% held by the state-owned Général des Carrières et des Mines SA (Gécamines), 5% held by SIMCO (100% held by Gecamines), and 5% held by DRC state. Glencore shareholding details are <a href="#">here</a> .
Time period covered by this report	1 January 2024 – 31 December 2024

<sup>1</sup> See [Glencore production report\\_FY2024](#)



KCC committed to the Copper Mark in 2024, and had the on-site assessment in October 2024. KCC became a Copper Mark recipient in early 2025: see [Participating Sites - The Copper Mark](#). The 2024 Glencore Sustainability Report (page 12) also has more information, available [here](#).

## 2 Third-party assessment summary

Date of last assessments	KCC last participated in the Responsible Minerals Assurance Process (RMAP) in May 2024 and is listed on the Responsible Minerals Initiative (RMI) Conformant Cobalt Refiners list and the Conformant Copper Processors List.
URL to most recent assessment summary or assurance report	RMI Conformant: <a href="#">Conformant Cobalt Refiners</a> and <a href="#">Conformant Copper Processors</a>
Re-assessment due date	RMAP: May 2025
Assessment period	1 May 2024 – 30 April 2025
Materials in scope	Cobalt Copper
Assessment firm	Arche Advisors

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### **3 Responsible Sourcing Programme**

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Glencore is committed to understanding and addressing human, social and labour rights violations, governance risks, and environmental impacts in our supply chains. Through our policies, standards and processes we promote respect for human rights in accordance with the United Nations (UN) Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact.

We have a comprehensive framework of policies and related programmes for operating responsibly, transparently and in line with the Glencore Values and Code of Conduct. This includes ethics and compliance, responsible sourcing, corporate affairs, finance, human resources, legal and industrial risk management. See: [Glencore Policies](#). Glencore's policy framework is applied and enforced at KCC, sometimes under KCC-specific documents. For example, KCC has its own Code of Conduct which mirrors the Glencore Code of Conduct.

Our Responsible Sourcing Policy (Policy) applies across the entire Glencore Group and outlines our commitments, approach, and requirements for responsibly sourcing goods, services, metals and minerals. The Policy is aligned with the OECD DDG when sourcing metals and minerals. The supporting Supplier Code of Conduct outlines our requirements and expectations for suppliers. At KCC, the supply chain due diligence is focussed on suppliers of good and services as there are no third-party suppliers of copper or cobalt feedstock.

See the annex for further information on the Glencore Responsible Sourcing Programme for metals and minerals.

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## **4 Management system**

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### **4.1 Management structure**

At KCC, the CEO is responsible for overseeing the implementation of the entire KCC policy framework and dedicated senior managers are responsible for implementing the relevant programmes covering topics such as human rights and the local grievance mechanism.

For the implementation of the Glencore Ethics and Compliance Programme, KCC works with a DRC regional compliance team who support employees in day-to-day business considerations, relating to ethical, lawful behaviour and policy implementation. This team is led by a Regional Compliance Officer, supported by two KCC compliance officers. The Regional Compliance Officer reports to the Glencore Head of Compliance, who may escalate cases to the Glencore Legal or the Glencore Group Responsible Sourcing Team when necessary. See the Ethics and Compliance Report (page 103) for more information, available [here](#).

See the annex for further information on the Glencore management structure for responsible sourcing of metals and minerals.

## 4.2 Internal systems of control

### Training

Employees receive induction and annual training on a wide range of policies and standards, relevant to their function, which may include among others, our Code of Conduct, Supplier Code, and Responsible Sourcing, Human Rights, Anti-Corruption and Bribery, Anti-Money Laundering, Sanctions, and Raising Concerns and Whistleblowing Policies.

Training on the Ethics and Compliance Programme includes, for example, raising concerns, facilitation payments, the giving and receiving of gifts and entertainment, and dealings with public officials. Details on the number of participants and the types of training are in Glencore's annual Ethics and Compliance Report, available [here](#) (page 51).

In accordance with this approach, all employees at KCC must have an initial induction training as well as:

- Annual online training for all KCC employees covering, among other things, conflicts of interest, communication with public officials, sanctions, and anti-corruption.
- Face-to-face compliance training for all KCC executive committee members
- Tailored face-to-face training with employees from identified higher-risk departments (such as finance, security, legal and tax, and community development programme), with 'deep dives' into the specific risks they face.
- Reinforcing of messages on compliance issues through regular reminders via emails and through visible signage throughout the site and on KCC's intranet.

Further details on the training related to the Responsible Sourcing Programme is in the annex. There is also an outline of how the Supplier Code of Conduct is communicated to suppliers and incorporated in commercial contracts.

### Chain of custody controls

KCC produces its own copper and cobalt and maintains direct custody and control over this material. Ore is extracted from KCC's open pits and underground operations and transported via trucks and conveyor belts to its concentrator (KTC) where the ore is crushed and concentrated and then transferred to its Luilu metallurgical plant (or crude refiner). The Luilu plant processes the ore through concentrate leach technology followed by solvent extraction and electrowinning for the copper production, and by selective precipitation for cobalt hydroxide production.



KCC's KOV pit



Trucks moving the ore



Processing at KCC



Cobalt hydroxide drying and loading bags

KCC tracks the movement of its material at every step using sampling and measurement systems for mass and metal content (weightometers, flowmeters, densitometers and sampling). The data is inputted into a 'metals accounting' system which produces an on-going metal/commodity balance for the operation. This accounting is subject to daily and monthly reconciliation exercises and a third-party annual verification.

Before leaving KCC for export, copper cathodes are strapped together, tagged with bar codes and loaded onto trucks. Similarly, each individual cobalt bag is sealed, tagged with barcodes, and loaded onto separate trucks which are covered with securely locking tarpaulins. The overland transport to port is overseen by the Glencore group. A tracking system monitors the

truck's journey to export and subsequent shipping port. Appropriate security escorts and checks along the road ensure a secure chain of custody.

Transport controls are assessed as part of our RMAP. This is intended to provide assurance to our supply chain stakeholders that the management and controls governing the transportation of materials has been third-party reviewed.

### **Speaking openly and raising concerns**

Glencore is committed to fostering a culture where all individuals – including employees, contractors, directors, and officers working in Glencore offices and industrial assets, and third parties such as customers, suppliers, or other stakeholders – feel empowered to express concerns securely and confidentially.

The Glencore Code of Conduct requires employees and contractors to raise concerns on breaches of the Code, policies or the law. Employees are also expected to report any breaches of requirements in procedures.

This also encompasses issues related to breaches of the Glencore Responsible Sourcing Policy or Supplier Code of Conduct, their underlying standards and procedures, or the law, which can be raised through either local whistleblowing contacts or Glencore's [Raising Concerns Platform](#). This platform is publicly accessible, including to stakeholders such as communities, shareholders, or partners, and allows for the voicing of concerns regarding to the circumstances of mineral extraction, trade, handling, and export. The Raising Concerns Programme incorporates zero tolerance for retaliation against individuals who report concerns.

Glencore's Raising Concerns Programme is operated under senior oversight via a Raising Concerns Investigations Committee made up of Glencore's CEO, CFO, General Counsel, Head of Industrial Assets, Head of Human Resources and Head of Compliance. The committee facilitates a consistent application of recommendations and sanctions across the Group, overseeing the operation of the programme and the conduct of investigations.

Employees and contractors are encouraged to first report their concerns to their supervisors or a local Whistleblowing Contact, whose details are accessible via the KCC intranet and on-site posters. If individuals are unable or uncomfortable using local channels, or if concerns remain unresolved, they can contact the corporate Raising Concerns Programme channels operated by Glencore Group. At KCC, information on the corporate Raising Concerns Programme channels is communicated through KCC's intranet, on-site posters, the Glencore Group website, and a local app installed on employees' work phones.

### **Local complaints and grievances mechanism**

KCC has a local level complaints and grievance process accessible to local communities aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPR) effectiveness criteria. This mechanism is designed to address both actual and perceived issues or concerns raised by any stakeholder who may be affected by the activities or presence of our operations. It allows for complaints and grievances to be raised anonymously and incorporate zero tolerance for retaliation against those submitting complaints or grievances.

The KCC complaints and grievance mechanism is communicated externally through the community department and community outreach programmes. Complaints and grievances can be raised in person, by phone, email or anonymously through a dropbox.

### **Concerns, complaints or grievances raised**

In 2024, no concerns, complaints, or grievances were recorded with regards to KCC's supply chain of metals and minerals. This is consistent with the fact that KCC does not have third party mineral suppliers or third-party mineral entering the product.

### **4.3 Record keeping system**

Glencore's [Information Governance Policy](#) sets out our approach to handling company information, including personal data.

KCC requires that all records relating to the scope of issues in this report are maintained for a minimum of five years. But most documents mentioned in this report must be maintained for 10 years in accordance with DRC law.

## **5 Risk identification**

### **5.1 Our approach**

Glencore identifies risks for mineral suppliers through the Responsible Sourcing and the Ethics and Compliance programmes, which are described in the Annex. At KCC, there are no third-party suppliers of copper and cobalt feedstock, everything is from own production. The risks related to the scope of the OECD DDG are therefore entirely related to KCC's own operations and managed directly through its own management systems.

Like all mining operations, KCC faces a range of risks. KCC adheres to Glencore's enterprise risk management framework, which requires conducting risk and opportunity assessments, maintaining a risk register, and integrating material risks and opportunities into business strategy, planning, and budgeting processes.

The risks related to the scope of the OECD DDG are summarised below.

See the annex for further information on the Glencore risk identification approach for responsible sourcing of metals and minerals.

### **5.2 Risk Identification – results**

The DRC is generally considered to be a conflict-affected and high-risk area (CAHRA) with high corruption index risk rankings.

Armed conflict has been present in the northeast of the country for many years, and we are sad to note that this has been escalating in 2024. This conflict does not directly impact KCC or surrounding communities, and production and logistics remain unaffected. This is because KCC is near Kolwezi in the south of the DRC, close to 1,500 km distance from the conflict area and with no reliable connecting road network. The export and transport of copper and cobalt

are also unaffected. We continue to monitor the situation and any related or unrelated escalation in security risks around our operations.

KCC is located in an area where there is Artisanal and Small-Scale Mining (ASM), a type of mining which is largely unmechanized, informal, and often with significant health, safety and human rights risks. A key issue is children working in ASM. KCC neither sources nor processes any ASM material. ASM miners operate near KCC and illegally trespass on our concession. This introduces security and safety challenges for both the ASM miners themselves and KCC workers.

OECD DDG Annex II risks at KCC are therefore mainly related to human rights, particularly those that arise from the proximity of ASM. Corruption and bribery risks are also present, and our ethics and compliance programme to address these is described in section 4.

## 6 Risk mitigation

The risks identified at KCC related to the OECD DDG remain largely consistent year on year. The 2024 risks are outlined below. For details on Glencore's risk mitigation approach to responsible sourcing of metals and minerals, refer to the annex.

### 6.1 Child labour

At KCC, individuals under the age of 18, including employees and on-site contractors, are not permitted to work or enter active operational areas. Access to these areas is strictly controlled through perimeter barriers and controlled entry points. Only approved employees and contractors may enter after undergoing rigorous screening, ID verification and induction. This process includes mandatory training on health, safety, environmental, social performance and human rights topics, as well as specialized work-related training.

### 6.2 Artisanal and small-scale mining (ASM)

#### Security, human rights and ASM

KCC is close to the city of Kolwezi and has multiple communities and settlements around the operations. One of the ongoing risks relates to ASM intruders into the area where KCC actively operates. This introduces safety risks to the intruders, KCC workers and the operations themselves. The security approach to manage ASM intruders is implemented through a management system, which seeks to prevent and mitigate related human rights risks aligned with the Voluntary Principles on Security and Human Rights (VPSHR). We fully support the VPSHR and are members of the Voluntary Principles Initiative including in its working group in the DRC. For more details, including a summary of ASM related security incidents at KCC, refer to our 2024 Voluntary Principles on Security and Human Rights Report (page 7). Additional information can also be found in our latest Sustainability Report. Both are available [here](#).

#### The broader approach to ASM

As part of our coexistence with ASM in the region, we support various community projects to address some of the root causes of issues in the ASM sector, including child labour. These

initiatives focus on economic empowerment, access to education and ASM related community engagement.

We also believe that tackling the challenges of ASM requires a collaborative, multi-stakeholder approach. As such, we actively support international initiatives and forums that promote a responsible ASM cobalt sector in the DRC.

We are a founding member and an active participant in the Fair Cobalt Alliance which unites supply chain actors, civil society and other key stakeholders to foster responsible cobalt ASM. Through this initiative we support the professionalization of ASM site management to enhance mine safety, environmental impact management and the creation of dignified working conditions for men and women in the sector. See the Fair Cobalt Alliance [website](#) for more information.

## 7 Extractive Industry Transparency Initiative

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Glencore has been an active supporter of the Extractive Industry Transparency Initiative (EITI) since 2011 and engages with the EITI at both local and international levels. Glencore is supportive of the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas, and mining sectors.

Where we operate in EITI member countries, we provide local EITI disclosures, participate in local multi-stakeholder groups and engage in policy consultation processes as appropriate.

Glencore promotes commodity-trading transparency by disclosing the payments Glencore makes to state-owned enterprises in EITI member countries for the purchases of crude oil, minerals and metals. Our annual Payments to Governments report (available [here](#)) is prepared in line with UK Transparency Requirements, which were introduced to implement the payments to governments requirements provided for in the EU Transparency and Accounting Directives (in the form as they continue to apply following the UK's exit from the European Union) and includes a voluntary additional report of payments by 'regions and commodity'.

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## Annex 1 – Glencore’s Responsible Sourcing Programme for metals and minerals supply chain

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### 1 Glencore Responsible Sourcing Programme

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Glencore recognises the imperative of responsible sourcing and supplying metals and minerals that advance everyday life. Our Responsible Sourcing Programme is our approach to incorporate social, ethical, and environmental considerations in the production of our products, throughout our supply chains and when managing relationships with our suppliers. We expect our suppliers to share our commitment to ethical, safe, and responsible business practices in line with our Purpose and Values.

Our [Responsible Sourcing Policy](#) (Policy) applies across the entire Glencore Group and outlines our commitments, approach, and requirements for responsibly sourcing goods, services, metals and minerals. The Policy is aligned with the OECD DDG when sourcing metals and minerals and is supported by a comprehensive Group Policy framework.

Glencore’s [Supplier Code of Conduct](#) (Supplier Code) outlines our requirements and expectations for suppliers and aligns with the OECD DDG’s Annex II standards for responsible sourcing of metals and minerals. It is shared with relevant stakeholders (suppliers, employees, etc.) and is available on Glencore’s website.

Our Responsible Sourcing Standard (Standard), which is implemented across our marketing offices and industrial assets, sets mandatory requirements for commodity departments to identify, assess and manage the key responsible sourcing risks related to suppliers of our goods, services, metals and minerals.

Our Supply Chain Due Diligence Procedure – Metals and Minerals (SCDD Procedure) provides a comprehensive framework for implementing steps 2 and 3 of the OECD DDG. It supports the identification, assessment, and management of risks in our supply chain, and in alignment with the requirements of our Responsible Sourcing Programme. As part of our commitment to continuous improvement aiming to strengthen our approach to responsible sourcing, in Q4/2024, the GRST commenced a process to enhance the SCDD Procedure by incorporating lessons learned since the inception of our Responsible Sourcing Programme. Key updates to the SCDD Procedure include a more comprehensive and refined SCDD process, and formalisation of site visits and on-the-ground assessments as integral components of our risk identification and mitigation strategy. The updated SCDD Procedure is being rolled out during 2025.

The Policy, the Supplier Code, the Standard and the SCDD Procedure apply to all employees, directors and officers, as well as contractors under Glencore’s direct supervision, working for any Glencore-controlled office or industrial asset worldwide.

Our Responsible Sourcing Programme is managed by Group Sustainability and is integrated within a broader set of policies, standards and procedures that guide the implementation of responsible practices, and the controls needed for risk mitigation and compliance. Supporting documents include materials from Group Compliance, Corporate Affairs, Finance, Human Resources, Legal and Industrial Risk Management. These policies and their underlying

materials set out our approach and commitment to operate responsibly, transparently and in line with our Values and our Code. See also: <https://www.glencore.com/who-we-are/policies>.

We are committed to understanding and addressing human, social and labour rights violations, governance risks, and environmental impacts in our supply chains. Through our policies, standards and processes, including our Responsible Sourcing Policy and Supplier Code, we promote respect for human rights in accordance with the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact. Through these mechanisms, our operations are required to respect and promote human rights across all our activities.

## **2 Glencore responsible sourcing management system**

### **2.1 Management structure**

The Group Responsible Sourcing team (GRST), which reports to Glencore's Head of Sustainability, manages Glencore's responsible sourcing programme for metals, minerals, goods and services. It supports our marketing offices and industrial assets implementing the Responsible Sourcing Programme.

The GRST undertakes a risk-based assessment of potential and current suppliers, with findings informing a tailored risk management process aligned, for metals and minerals, with the five-step due diligence framework outlined in Annex I of the OECD DDG.

When high risks are identified, the GRST may recommend business disengagement or suspension. If a relevant commodity department disagrees with the recommendation, Glencore's Head of Sustainability escalates the case to the Business Approval Committee (BAC) for a final decision on continuation, discontinuation and agreed actions. The BAC, in turn, reports to Glencore's Board of Directors.

The BAC is a sub-committee of Glencore's ESG Committee, and comprises Glencore's CEO, CFO, General Counsel, Head of Sustainability and other relevant corporate or business heads as required. It determines, sets guidance and criteria, and reviews business relationships, transactions or counterparties that give rise to ethical or reputational concerns.

The GRST and the Compliance team work collaboratively to manage responsible sourcing and compliance related due diligence within the supply chain. Utilising shared tools and a common platform allows for a more effective coordination in handling supplier's due diligence. Both teams maintain and access a centralised list of declined and red-flagged parties to uphold consistent standards across commodities and operations. This coordinated approach enhances transparency, streamlines processes, and reinforces our commitment to continuous improvement for internal and external stakeholders.

### **2.2 Internal systems of control**

#### **Training**

Employees receive induction and annual training on a wide range of policies and standards, relevant to their function, which may include among others, our Code of Conduct, Supplier

Code, and Responsible Sourcing, Human Rights, Anti-Corruption and Bribery, Anti-Money Laundering, Sanctions, and Raising Concerns and Whistleblowing Policies. Training includes guidance on topics such as raising concerns, facilitation payments, the giving and receiving of gifts and entertainment, and dealings with public officials. As part of our continuous improvement efforts, we have developed interactive training materials on our Supplier Code of Conduct and the risks associated with sourcing metals and minerals as well as the procurement of goods and services to enhance employees' understanding of responsible sourcing expectations. Details on the numbers participating in training and the type of training undertaken are available in Glencore's annual Ethics and Compliance Report, available [here](#).

Training is provided at our marketing offices and industrial assets to raise awareness and inform the respective sourcing teams on our responsible sourcing programme. Training materials include practical questions and hypothetical scenarios illustrating how responsible sourcing and ethics and compliance dilemmas might manifest themselves in an employee's daily work.

In 2024, 42 employees at KCC participated in interactive training on the Supplier Code of Conduct and responsible sourcing risks (relevant to goods and services).

### **Communicating the Supplier Code of Conduct and commercial contracts**

We seek to incorporate our Supplier Code of Conduct in commercial contracts with relevant stakeholders and it is available on [Glencore's website](#). The Supplier Code of Conduct outlines our expectations and requirements of suppliers, emphasising ethical practices and compliance with our due diligence requirements. Our Supplier Code encourages suppliers to set similar expectations with their own suppliers, reflecting our commitment to cascade our conduct standards up the supply chain. Further, our Supplier Code of Conduct requires that our suppliers have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organization (ILO) in their operations and supply chains. We use the term zero tolerance to express that modern slavery, including child labour, has no place in our supply chains. We recognise that this does not mean that we can guarantee that our supply chains are free from modern slavery, rather we commit to working to addressing modern slavery wherever we find it, a 'zero tolerance' approach.

### **2.3 Record keeping system**

Glencore's Information Governance Policy sets out our approach to handling company information, including personal data. Glencore's headquarters information on suppliers is stored according to the local Retention and Destruction Procedure and a Glencore retention schedule which outlines the minimum retention time, which is based on the document type.

## **3 Glencore Risk identification**

### **3.1 Glencore approach**

#### **Know Your Counterparty (KYC)**

Corporate and regional compliance teams screen suppliers against sanctions, law enforcements, regulatory enforcements and politically exposed person (PEP) watch lists for

compliance with anti-money laundering (AML), KYC, counter terrorist financing and PEP regulations.

### **Supply chain due diligence**

As outlined in the Group Responsible Sourcing Policy, Glencore has a comprehensive framework for identifying and managing key risks in our metals and minerals supply chains, from supplier due diligence, selection, onboarding and monitoring, through to disengagement.

The GRST reviews and assesses the presence of any OECD DDG defined red flags relating to third-party suppliers and the materials we source from these. The supplier is assessed against risks associated with the extraction, transport or trade of minerals specified in the OECD DDG's Annex II. To support the identification of these red flags we use a list of Conflict Affected and High-Risk Areas (CAHRAs). CAHRAs are typically regions or countries with socio-economic and political crises, institutional deficiencies and weak rule of law, and widespread violence including armed conflicts. Such countries are susceptible to human rights abuses, including torture, cruel, inhumane and degrading treatment, child, forced or compulsory labour and sexual violence.

We develop and maintain our CAHRAs list using internationally recognised indices on conflict, democracy and rule of law, and human rights. Our CAHRAs list also considers the US Dodd Frank Act, the EU indicative and non-exhaustive CAHRA list for tin, tantalum, tungsten and gold, and countries where artisanal and small-scale mining (ASM) is prevalent for minerals sourced by Glencore.

The GRST updates the CAHRAs list annually to reflect significant changes in country circumstance in consultation with an external consultant. In 2024, the following relevant indices were used to obtain the list of CAHRAs (countries and regions):

#### **Child labour**

- [UNICEF Children's Rights in the Workplace Index 2023 \(updated June 2023\)](#)
- [US Department of Labour List of Goods Produced by Child Labour or Forced Labour 2022 \(updated 28 September 2022\)](#)

#### **Modern slavery, forced labour and human trafficking**

- Prevalence of Modern Slavery 2023 (updated 6 April 2024)
- [US Department of Labor List of Goods Produced by Child Labor or Forced Labor \(updated 28 September 2022\)](#)

#### **Gross Violations of Human Rights**

- [Fragile States Index 2023](#) (updated 30 June 2023)
- [World Governance Indicators 2022](#) – Political Stability and Absence of Violence/Terrorism (updated 29 September 2023)

#### **Conflict**

- Armed Conflict Location and Event [Database](#) (ACLED) (updated 12 April 2024)
- [Fragile States Index 2023](#) (updated 14 June 2023)
- [Global Peace Index 2023](#) (updated 28 June 2023)

- [World Governance Indicators 2022](#) – Political Stability and Absence of Violence/Terrorism (updated 29 September 2023)
- [Indicative, non-exhaustive list of Conflict-Affected and High-risk Areas under Regulation \(Eu\) 2017/821 December 2023](#), also known as the “EU CAHRA List” (updated March 2024)

**Corruption (including illegal taxation or extortion)**

- [World Governance Indicators 2022](#) – Control of Corruption (updated 29 September 2023)
- [Corruption Perceptions Index 2023](#) (updated 1 January 2024)

**Artisanal and small-scale mining (ASM)**

- An overview of countries where ASM is present for minerals sourced by Glencore, as determined by an external consultant (The Dragonfly Initiative in house data, 2024).

If an OECD defined red flag, or other potential risks are identified through screening of negative news, suggesting a potential breach of our Supplier Code, the GRST initiates enhanced due diligence (EDD). Risk identification tools include third-party database screenings, open-source desktop research, and supply chain due diligence questionnaires. When necessary and where feasible, on-the-ground assessments may also be conducted as part of EDD. Our Responsible Sourcing Policy aligns with the OECD DDG on managing OECD DDG Annex II risks, including the principles of suspension and termination where required.

## 4 Glencore Risk mitigation

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We are committed to addressing OECD DDG Annex II risks identified through our Responsible Sourcing Programme.

Where the GRST identifies high risk suppliers based on the presence of OECD DDG red flags or negative news, GRST initiates EDD including supplier engagement, and, if relevant and feasible, designs bespoke Corrective Action Plans (CAPs) tailored to the severity of the risks identified and the size and complexity of the supplier’s company. Specific timeframes for measuring objective improvements are detailed in the CAPs, which are incorporated into the supplier’s contractual obligations where appropriate and feasible.

When sourcing from, operating in, or transiting through CAHRAs, Glencore follows the OECD DDG including the suspension and termination guidance on risks outlined in the Annex II of the OECD, DDG which is reiterated in Glencore’s Responsible Sourcing Policy.

### **Important information**

This material does not purport to contain all of the information you may wish to consider. The general approach to our responsible sourcing programme described herein may be subject to certain exceptions. For example, for certain business activities we apply a bespoke approach, such as in connection with the purchase of certain energy products when aspects of our responsible sourcing programme may not be possible to observe due to market practice and other factors.

### **Cautionary statement regarding forward-looking information**

Certain descriptions in this document are oriented towards future events and therefore contains statements that are, or may be deemed to be, “forward-looking statements” which are prospective in nature. By their nature, forward-looking statements involve known and unknown risks, uncertainties and other factors which may cause actual results, performance or achievements to differ materially from any future events, results, performance, achievements or other outcomes expressed or implied by such forward-looking statements. No statement in this document is intended as any kind of forecast (including, without limitation, a profit forecast or a profit estimate), guarantee or prediction of future events or performance and past performance cannot be relied on as a guide to future performance. Except as required by applicable rules or laws or regulations, Glencore is not under any obligation, and Glencore and its affiliates expressly disclaim any intention, obligation or undertaking, to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise. For further information, see the “Important notice” section of the latest Half-Year Report and Annual Report of Glencore plc, which can each be found at [glencore.com/publications](http://glencore.com/publications).

### **Information preparation**

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