

GLENCORE

UNITED NATIONS GLOBAL COMPACT Communication on Progress in 2021

UN Global Compact Communication on Progress 2021

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CEO statement of support

A statement of support for the UN Global Compact and its principles

As Chief Executive Officer (CEO) of the Glencore Group, I am proud to state our continuing support for the United Nations Global Compact's (UNGC) initiative and its principles on human rights, labour, the environment and anti-corruption.

Responsibility is one of Glencore's six values, as well as safety, integrity, openness, simplicity and entrepreneurialism. We take our responsibilities to our people, to society and to the environment very seriously. Our corporate purpose is 'Responsibly sourcing the commodities that advance everyday life' and we are committed to advancing everyday life by supplying commodities needed to develop, sustain and improve the world around us.

Our approach to sustainability consists of our corporate strategy, our six values, our Code of Conduct, our Group Health, Safety, Environment and Community and Human Rights (HSEC&HR) Framework and Strategy, supported by relevant policies. These align with the UNGC and its principles and apply to our workforce, both our direct employees and contractors under our direct supervision, across our assets and offices.

Our Group HSEC&HR team undertakes annual reviews of our Group HSEC&HR Strategy, working with our individual industrial assets and commodity departments' industrial teams. They ensure that it fully aligns with our business requirements and the expectations of our external stakeholders.

Our Group HSEC&HR Strategy considers our aims against four core pillars: health; safety; environment; and community and human rights. The strategy clearly defines imperatives, objectives, priority areas and targets. Our commodity departments and their industrial assets align their annual HSEC&HR plans to this strategy. We believe it is a robust basis for ensuring we maintain an effective and appropriate approach to sustainability.

Our 2021 Communication on Progress covers the period from 01 January to 31 December 2021 and demonstrates our continuing progress on integrating the UNGC and its principles into everything we do. It references our *Annual and Sustainability Reports*, as well as several other publications, including Glencore's policies and our *Modern Slavery Statement*, which reports on our management of the risks related to modern slavery in our operations and our supply chain. In early 2022, we published our first Ethics and Compliance Report, which details our ethics and compliance programme. These publications are available at www.glencore.com/publications, where further information on our approach to sustainability is also available.

This Communication on Progress is available on the UN Global Compact website, as well as our website (Glencore.com).

Gary Nagle
Chief Executive Officer

GLENCORE

The Ten Principles of the UN Global Compact

The UN Global Compact asks companies to operate in a manner that meets fundamental responsibilities for human rights, labour, environment and anti-corruption. Glencore is committed to making a positive contribution to society while creating lasting benefits for stakeholders in a manner that is responsible, transparent and respectful of the rights of all.

We have incorporated the UN Global Compact's Ten Principles into our strategies, policies and procedures.

The UN Global Compact's Ten Principles derive from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption.

The UN Global Compact's Ten Principles:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

UN Global Compact Communication on Progress 2021 and Global Compact Advanced COP Self-Assessment

We have compiled the information in Glencore's Communication on Progress (COP) 2021 from the following publicly available publications:

- 2021 Annual Report (AR21)
- 2021 Sustainability Report 2021 (SR21)
- 2021 Ethics and Compliance Report (E&CR21)
- 2021 Climate Change Report (CCR21)
- 2021 Modern Slavery Statement (MSS21)
- Our Values
- Code of Conduct
- Glencore Anti-Corruption Policy
- Glencore Diversity and Inclusion Policy
- Glencore Equality of Opportunity Policy
- Glencore Environmental Policy
- Glencore Human Rights Policy
- Glencore Political Engagement Policy
- Glencore Responsible Sourcing Policy
- Glencore Social Performance Policy
- Glencore Tailings Storage Facility Policy
- Glencore Whistleblowing Policy
- Glencore Supplier Code of Conduct (Supplier Code of Conduct)
- Raising Concerns Programme

These are available on our website: www.glencore.com/publications

Our Communication on Progress also references our Group HSEC Strategic Overview, which is an internal document.

The following pages are our self-assessment on how we have met the GC Advanced Level criteria and reference our implementation of best practices, followed by our report on the ten principles. We consider that we have met a criterion when we communicate on its implementation or planned implementation.

Implementing the ten UNGC principles into strategies and operations

Criterion 1: The COP describes mainstreaming into corporate functions and business units	
Best practices	Reference
Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives	<ul style="list-style-type: none"> • <i>Sustainability and Corporate governance report</i> in AR21 • <i>Sustainability governance</i> in SR21
Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy	<ul style="list-style-type: none"> • <i>Chairman's introduction, CEO statement, Investment case, Our strategy for a sustainable future</i> and <i>Sustainability</i> in AR21 • <i>Sustainability governance</i> in SR21
Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary	<ul style="list-style-type: none"> • <i>Sustainability governance</i> in SR21 • Group HSEC Strategic Overview (internal document) • Glencore Responsible Sourcing Policy
Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs	<ul style="list-style-type: none"> • <i>Chairman's introduction, CEO statement, Investment case, Our strategy for a sustainable future</i> and <i>Sustainability</i> in AR21 • <i>Sustainability governance</i> in SR21
Ensure that different corporate functions coordinate closely to maximise performance and avoid unintended negative impacts	<ul style="list-style-type: none"> • <i>Investment case</i> and <i>Our strategy for a sustainable future</i> in AR21 • <i>Sustainability governance</i> in SR21
Other established or emerging best practices	<ul style="list-style-type: none"> • <i>Sustainability governance, Material topics and Stakeholder engagement</i> in SR21

Criterion 2: The COP describes value chain implementation	
Best practices	Reference
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	<ul style="list-style-type: none"> • Code of Conduct • Supplier Code of Conduct • Responsible Sourcing Policy • <i>Investment case, Our market drivers, Business model, Our strategy for a sustainable future and Principal risks and uncertainties</i> in AR21 • <i>Material topics (Responsible sourcing and supply)</i> in SR21 • <i>Our business partners</i> in E&CR21 • <i>Identifying risks</i> in MSS21
Communicate policies and expectations to suppliers and other relevant business partners	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Glencore Anti-Corruption Policy • Responsible Sourcing Policy • Supplier Code of Conduct • <i>Business model, Section 172 statement and stakeholder engagement, Ethics and compliance</i> in AR21 • <i>Material topics (Responsible sourcing and supply)</i> in SR21 • <i>Our business partners</i> in E&CR21
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	<ul style="list-style-type: none"> • Glencore Human Rights Policy • Glencore Anti-Corruption Policy • Raising Concerns Programme • Responsible Sourcing Policy • Supplier Code of Conduct • <i>Ethics and compliance and Corporate Governance report</i> in AR21 • <i>Material topics (Responsible sourcing and supply)</i> in SR21 • <i>Our business partners</i> in E&CR21 • <i>Addressing risks</i> in MSS21
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Glencore Anti-Corruption Policy • Responsible Sourcing Policy • Supplier Code of Conduct • <i>Addressing risks</i> in MSS21
Other established or emerging best practices	<ul style="list-style-type: none"> • Supplier Code of Conduct • <i>Stakeholder engagement and Material topics (Responsible sourcing and supply)</i> in SR21

Implementing the Ten Principles

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment, and anti-corruption. These take the form of ten principles.

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Human rights

The first two UNGC principles relate to human rights. Glencore prioritises respect for human rights everywhere that we operate. Our industrial assets have many contacts with the communities in which we work. We uphold the human rights of our people and our local communities, including vulnerable groups such as women, children, Indigenous People and victims of conflict. We pay particular attention to the handling of human rights in regions where our industrial assets require additional security.

Glencore's Human Rights Policy sets out our approach to this vital topic. The Policy aligns with the *Protect, Respect and Remedy* framework from the UN *Guiding Principles on Business and Human Rights*, and with the ILO's *Core Conventions*. In addition, our security procedures align with the Voluntary Principles on Security and Human Rights (Voluntary Principles).

Day-to-day responsibility for ensuring that our people comply with the policy lies with our commodity departments and industrial assets' managers. Risk assessment is fundamental to our Group approach: we require each industrial asset to conduct a risk assessment for human rights infringements at key phases of its lifecycle. Assessments are adapted for the specific circumstances of each operational region. Our industrial assets must also operate grievance mechanisms that are accessible, accountable and fair, which let our stakeholders raise concerns without fear of recrimination. Industrial assets are also required to conduct regular human rights training for their workforce. This covers general human rights awareness during day-to-day activities for our wider workforce, as well as focused Voluntary Principles training for our security employees and contractors in countries where the risk of security-related human rights abuses is relatively high.

Where our marketing business sources from third parties, we apply Glencore's RS Policy and Supplier Code of Conduct, which includes human rights due diligence. Specifically for suppliers of metals and minerals, we conduct due diligence in accordance with the 5-Step due diligence framework defined in Annex I of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 3rd Edition.

We publish information that specifically addresses these two principles in:

- Code of Conduct
- Glencore Human Rights Policy

- Glencore Social Performance Policy
- Responsible Sourcing Policy
- Supplier Code of Conduct
- *Material topics (Human rights, Responsible citizenship) in SR21*
- MSS21

Labour standards

The next four principles relate to labour standards.

Our people are our greatest asset. We treat our employees fairly, uphold their rights and reward them competitively, in line with their contribution to our success. We believe that it is vital to our business to attract and retain the best people at every level.

All our operations strive to provide clear, attractive career paths and safe, healthy workplaces without discrimination or harassment. We rigorously enforce our Equality of Opportunity Policy at every level of the Group. We uphold the ILO Declaration on Fundamental Principles and Rights at Work.

Within all our industrial assets' workforces, our intention is to reflect the demographics of our host communities; we prohibit discrimination based on race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, political or other opinion, or any other bias. We do not tolerate any form of racial, sexual or workplace harassment.

We prohibit all forms of child, forced and compulsory labour, as defined by the ILO.

We recognise and uphold the rights of our employees, whatever their location or role, to a safe workplace, freedom of association, collective representation, just compensation, job security and development opportunities. We are committed to working honestly and openly with labour unions across the Group.

We publish information that specifically addresses these four principles in:

- Code of Conduct
- Glencore Human Rights Policy
- Glencore Diversity and Inclusion Policy
- Glencore Equality of Opportunity Policy
- Glencore Responsible Sourcing Policy
- Supplier Code of Conduct
- *Our people* in AR21
- *Material topics (Human rights, Responsible citizenship, Our people)* in SR21
- MSS21

Environment

The next three principles relate to the environment.

We work to minimise and mitigate any negative impact from our operations. These may be direct or indirect. We continually work to improve our performance in this regard. Glencore's Environmental Policy aligns with international environmental standards, including ISO 14001.

Glencore's Environmental Policy requires our industrial assets to undertake detailed risk assessment reviews and identify appropriate mitigation action where necessary. Our industrial assets maintain environmental management plans based on these reviews. The plans focus on: maintaining the integrity of our facilities; the efficient use of resources; preserving protected areas and biodiversity; and ensuring closure planning and rehabilitation. Industrial assets update these plans at each stage of their lifecycles and incorporate them into overall risk registers and management plans.

We disseminate scientific data and promote good biodiversity assessment practice and experiences whenever possible. We support the development and implementation of scientifically sound, inclusive and transparent approaches to integrated land use planning, biodiversity, conservation and mining.

We believe that we can play a constructive role in the development of public policy on climate change and energy. We wish to support constructive and informed public debate and value our engagement with all stakeholders. We actively support the development of low-emission technologies and our coal department has established a wholly-owned, non-profit subsidiary, Carbon Transport and Storage Company (CTSCo), leading a carbon capture and storage project in Australia. We established the CTSCo project to demonstrate the technical viability, integration and safe operation of carbon capture storage in Surat Basin, Australia.

We publish information that specifically addresses these three principles in:

- Code of Conduct
- Glencore Environmental Policy
- *Climate change* in AR21
- *Material topics (Catastrophic hazard management, Climate change, Water, Land stewardship)* in SR21
- CCR21

Anti-corruption

The final principle relates to corruption.

Our primary objective is to ensure that we maintain a culture of ethical behaviour and compliance throughout the Group, rather than achieving the minimum required by law. Our global Anti-Corruption Policy includes our clear position on bribery and corruption, which is that offering, paying, authorising, soliciting or accepting bribes is unacceptable.

We will not knowingly assist any third party in breaching the law, or participate in any criminal, fraudulent or corrupt practice in any country. We seek to prevent such misconduct through training programmes and strong leadership, underpinned by internal policies, procedures and controls.

If one of our people encounters a situation in which our policies appear breached, the individual must raise this promptly with a supervisor or manager, local compliance co-ordinator, or a member of the Board's Environmental, Social and Governance Committee.

We publish information that specifically addresses this principle in:

- Code of Conduct
- Glencore Global Anti-Corruption Policy
- Glencore Political Engagement Policy
- Glencore Whistle Blowing Policy
- *Ethics and compliance* in AR21
- E&CR21
- Raising Concerns Programme

Robust human rights management policies and procedures

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights	
Best practices	Reference
Commitment to comply with all applicable laws and respect internationally recognised human rights, wherever the company operates (eg the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Glencore Social Performance Policy • Glencore Responsible Sourcing Policy • <i>Ethics and compliance</i> in AR21 • <i>Chairman’s introduction, CEO review and Material topics (Human rights, Our people)</i> in SR21 • <i>Our approach</i> in E&C21
Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)	<ul style="list-style-type: none"> • Glencore Human Rights Policy • Glencore Social Performance Policy
Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct
Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Glencore Social Performance Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct

Criterion 4: The COP describes effective management systems to integrate the human rights principles	
Best practices	Reference
Process to ensure that internationally recognised human rights are respected	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Glencore Social Performance Policy • Glencore Responsible Sourcing Policy • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • <i>Our approach</i> in E&C21
On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)	<ul style="list-style-type: none"> • Glencore Social Performance Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR21

	<ul style="list-style-type: none"> • <i>Our approach</i> and <i>Our business partners</i> in E&C21
Internal awareness-raising and training on human rights for management and employees	<ul style="list-style-type: none"> • Glencore Social Performance Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> and <i>Our people</i> in AR21 • <i>Material topics (Human rights, Responsible sourcing and supply, Our people)</i> in SR21 • <i>Training and awareness</i> in E&CR21 • <i>Addressing risks</i> in MSS21
Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 +ARE 4)	<ul style="list-style-type: none"> • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • <i>Whistleblowing framework</i> in E&CR21
Allocation of responsibilities and accountability for addressing human rights impacts	<ul style="list-style-type: none"> • HSEC Strategic Overview (internal document) • <i>Sustainability governance</i> and <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR21 • Glencore Responsible Sourcing Policy • Glencore Social Performance Policy
Internal decision-making, budget and oversight for effective responses to human rights impacts	<ul style="list-style-type: none"> • Board HSEC Committee • HSEC Strategic Overview (internal document) • <i>Sustainability governance</i> in SR21
Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE3 + ARE 4)	<ul style="list-style-type: none"> • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21
Process and programmes in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)	<ul style="list-style-type: none"> • <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR21

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration	
Best practices	Reference
System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)	<ul style="list-style-type: none"> • Supplier Code of Conduct • Industrial asset, and Group-level assurance programmes (internal process) • Annual report on progress submitted to the Voluntary Principles • <i>Effectiveness</i> in MSS21
Monitoring drawn from internal and external feedback, including affected stakeholders	<ul style="list-style-type: none"> • <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR21
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> • <i>Corporate governance report</i> in AR21 • <i>Sustainability governance and Material topics (Human rights, Responsible</i>

	<i>citizenship, Responsible sourcing and supply) in SR21</i>
Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)	<ul style="list-style-type: none"> • <i>Ethics and compliance in AR21</i> • <i>Material topics (Human rights, Responsible citizenship) in SR21</i> • <i>Whistleblowing framework in E&CR21</i> • <i>Glencore Social Performance Policy</i> • <i>Glencore Whistleblowing Policy</i>
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 + ARE4)	<ul style="list-style-type: none"> • <i>Code of Conduct</i> • <i>Glencore Human Rights Policy</i> • <i>Glencore Social Performance Policy</i> • <i>Ethics and compliance in AR21</i> • <i>Material topics (Human rights) in SR21</i> • <i>Whistleblowing framework in E&CR21</i>
Outcomes of integration of the human rights principles	<ul style="list-style-type: none"> • <i>Ethics and compliance in AR21</i> • <i>Material topics (Human rights) in SR21</i> • <i>Whistleblowing framework in E&CR21</i>

Robust labour management policies and procedures

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour	
Best practices	Reference
Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	<ul style="list-style-type: none"> • Code of Conduct • Glencore Equality of Opportunity Policy • Glencore Diversity and Inclusion Policy • Glencore Human Rights Policy • Glencore Responsible Sourcing Policy • <i>Our people</i> in AR21 • <i>Stakeholder engagement and Material topics (Our people)</i> in SR21 • <i>Addressing risks</i> in MSS21
Reflection on the relevance of the labour principles for the company	<ul style="list-style-type: none"> • Code of Conduct • Glencore Equality of Opportunity Policy • Glencore Diversity and Inclusion Policy • Glencore Human Rights Policy • Glencore Responsible Sourcing Policy • <i>Our people</i> in AR21 • <i>Material topics (Our people)</i> in SR21
Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).	<ul style="list-style-type: none"> • Code of Conduct • Glencore Equality of Opportunity Policy • Glencore Diversity and Inclusion Policy • Glencore Human Rights Policy
Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> • Code of Conduct • Glencore Equality of Opportunity Policy • Glencore Diversity and Inclusion Policy • Glencore Human Rights Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Our people</i> in AR21 • <i>Material topics (Our people)</i> in SR21
Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation	<ul style="list-style-type: none"> • <i>Our People</i> in AR21 • <i>Material topics (Our people)</i> in SR21
Participation and leadership by employers' organisations (international and national) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).	N/A

Structural engagement with a global union, possibly via a Global Framework Agreement	N/A
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Criterion 7: The COP describes effective management systems to integrate the labour principles	
Best practices	Reference
Risk and impact assessments in the area of labour	<ul style="list-style-type: none"> • <i>Our people</i> and <i>Principal risks and uncertainties</i> in AR21 • <i>Material topics (Our people)</i> in SR21 • <i>Identifying risks</i> in MSS21
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<ul style="list-style-type: none"> • <i>Our people</i> in AR21 • <i>Stakeholder engagement and Material topics (Our people)</i> in SR21
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> • Group HSEC Strategic Overview (internal document) • <i>Our people</i> in AR21 • <i>Sustainability governance and Material topics (Our people)</i> in SR21
Internal awareness-raising and training on the labour principles for management and employees	<ul style="list-style-type: none"> • Code of Conduct • <i>Ethics and compliance</i> and <i>Our people</i> in AR21 • <i>Material topics (Our people)</i> in SR21
Active engagement with suppliers to address labour-related challenges	<ul style="list-style-type: none"> • Responsible Sourcing Policy • Supplier Code of Conduct • <i>Our people</i> and <i>Ethics and compliance</i> in AR21 • <i>Material topics (Responsible sourcing and supply)</i> in SR21 • <i>Addressing risks</i> in MSS21
Grievance mechanisms, communication channels and other procedures (e.g., whistle-blower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in line with the representative organisation of workers	<ul style="list-style-type: none"> • Glencore Equality of Opportunity Policy • Glencore Diversity and Inclusion Policy • Glencore Human Rights Policy • Code of Conduct • Raising Concerns Programme • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights)</i> in SR21 • <i>Whistleblowing framework</i> in E&CR21

Criterion 8: The COP describes monitoring and evaluation mechanisms of labour principles integration	
Best practices	Reference
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> • <i>Our people</i> in AR21 • <i>Performance overview</i> and <i>ESG Data Book</i> in SR21
Dialogues with the representative organisation of workers to regularly review progress made and jointly identify priorities for the future	<ul style="list-style-type: none"> • <i>Section 172 statement and stakeholder engagement</i> and <i>Our people</i> in AR21 • <i>Stakeholder engagement</i> and <i>Material topics (Our people)</i> in SR21
Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	<ul style="list-style-type: none"> • Code of Conduct • Responsible Sourcing Policy • Supplier Code of Conduct • <i>Material topics (Responsible sourcing and supply)</i> in SR21 • <i>Addressing risks</i> in MSS21
Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices	<ul style="list-style-type: none"> • Code of Conduct • Responsible Sourcing Policy • Supplier Code of Conduct • <i>Material topics (Responsible sourcing and supply)</i> in SR21 • <i>Addressing risks</i> in MSS21
Outcomes of integration of the Labour principles	<ul style="list-style-type: none"> • <i>Performance overview, Material topics (Our people)</i> and <i>ESG Data Book</i> in SR21

Robust environmental management policies and procedures

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship	
Best practices	Reference
Reference to relevant international conventions and other international instruments (eg Rio Declaration on Environment and Development)	<ul style="list-style-type: none"> • We map and align our policies with relevant international standards and best practice. • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Chairman’s introduction, CEO review and Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship)</i> in SR21 • CCR21
Reflection on the relevance of environmental stewardship for the company	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship)</i> in SR21 • CCR21
Written company policy on environmental stewardship	<ul style="list-style-type: none"> • Code of Conduct • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> • Code of Conduct • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct
Specific commitments and goals for specified years	<ul style="list-style-type: none"> • <i>Performance overview and Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship and Responsible sourcing and supply)</i> in SR21 • CCR21

Criterion 10: The COP describes effective management systems to integrate the environmental principles	
Best practices	Reference
Environmental risk and impact assessments	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Climate change and Principal risks and uncertainties</i> in AR21 • <i>Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship and Responsible sourcing and supply)</i> in SR21

	<ul style="list-style-type: none"> • CCR21
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship and Responsible sourcing and supply)</i> in SR21 • CCR21
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> • Group HSEC Strategic Overview (internal document) • Glencore Environmental Policy • Glencore Responsible Sourcing Policy • Glencore Tailings Storage Facility Policy • <i>Climate change</i> in AR21 • <i>Material topics (Water, Land stewardship and Responsible sourcing and supply)</i> in SR21 • CCR21
Internal awareness-raising and training on environmental stewardship for management and employees	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Climate change</i> in AR21 • <i>Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship)</i> in SR21 • CCR21
Grievance mechanisms, communication channels and other procedures (eg whistle-blower mechanisms) for reporting concerns or seeking advice regarding environmental impacts	<ul style="list-style-type: none"> • Code of Conduct • Glencore Human Rights Policy • Raising Concerns Programme • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21

Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

Best practices	Reference
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Performance overview, Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship)</i> and ESG Data Book in SR21 • CCR21
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy • <i>Corporate Governance report</i> in AR21 • <i>Sustainability governance and Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship)</i> in SR21

Process to deal with incidents	<ul style="list-style-type: none"> • Glencore Environmental Policy • Glencore Tailings Storage Facility Policy
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	<ul style="list-style-type: none"> • Code of Conduct • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Material topics (Catastrophic hazard management, Climate change, Water and effluents, Waste and air emissions) in SR21</i>
Outcomes of integration of the environmental principles	<ul style="list-style-type: none"> • <i>Performance overview, Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship) and ESG Data Book in SR21</i> • CCR21

Robust anti-corruption management policies and procedures

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption	
Best practices	Reference
Publicly stated formal policy of zero-tolerance of corruption (D1)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Our approach</i> in E&CR21
Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes(B2)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Our approach</i> in E&CR21
Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Our approach</i> in E&CR21
Detailed policies for high-risk areas of corruption (D4)	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy
Policy on anti-corruption regarding business partners (D5)	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct

Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle	
Best practices	Reference
Support by the organization's leadership for anti-corruption (B4)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Governance and structure</i> in E&CR21
Carrying out risk assessment of potential areas of corruption	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Risk assessments</i> in E&CR21
Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • <i>Ethics and compliance</i> in AR21 • <i>The Glencore Ethics Compliance programme</i> in E&CR21
Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	<ul style="list-style-type: none"> • <i>Ethics and compliance</i> and <i>Corporate Governance report</i> in AR21 • <i>The Glencore Ethics Compliance programme</i> in E&CR21

Actions taken to encourage business partners to implement anti-corruption commitments (D6)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Business partner management framework</i> in E&CR21
Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy • <i>Corporate Governance report</i> in AR21 • <i>Governance and structure</i> in E&CR21
Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • <i>Ethics and compliance</i> in AR21 • <i>Whistleblowing framework</i> in E&CR21
Internal accounting and auditing procedures related to anticorruption	<ul style="list-style-type: none"> • <i>Ethics and compliance</i> in AR21 • <i>Monitoring</i> in E&CR21

Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	
Best practices	Reference
Leadership review of monitoring and improvement results (D12)	<ul style="list-style-type: none"> • <i>Corporate Governance report</i> in AR21 • <i>Governance</i> in E&CR21
Process to deal with incidents (D13)	<ul style="list-style-type: none"> • Code of Conduct • Glencore Global Anti-Corruption Policy • <i>Ethics and compliance</i> in AR21 • <i>Whistleblowing framework</i> in E&CR21
Public legal cases relating to corruption	www.glencore.com/investigations
Use of independent external assurance of anti-corruption programmes	N/A
Outcomes of integration of the anti-corruption principle	<ul style="list-style-type: none"> • <i>Ethics and compliance</i> in AR21 • <i>Key topics</i> in E&CR21

Taking action in support of broader UN goals and issues

Criterion 15: The COP describes core business contributions to UN goals and issues	
Best practices	Reference
Align core business strategy with one or more relevant UN goals/issues	<ul style="list-style-type: none"> • Code of Conduct • <i>Investment case</i> and <i>Our strategy for a sustainable future</i> in AR21 • <i>Chairman’s introduction, CEO review Performance overview</i> and <i>Stakeholder engagement</i> in SR21 • Mapping of our material topics to the UN Sustainable Development Goals in <i>Material topics</i> in SR21
Develop relevant products and services or design business models that contribute to UN goals/issues	<ul style="list-style-type: none"> • <i>Investment case</i> and <i>Our strategy for a sustainable future</i> in AR21 • <i>Stakeholder engagement</i> and <i>Material topics</i> in SR21 • CCR21 • <i>Addressing risks</i> in MSS21
Adopt and modify operating procedures to maximise contribution to UN goals/issues	<ul style="list-style-type: none"> • <i>Investment case, Our strategy for a sustainable future</i> and <i>Climate change</i> in AR21 • <i>Material topics</i> and <i>ESG Data Book</i> in SR21 • CCR21 • <i>Addressing risks</i> in MSS21

Criterion 16: The COP describes strategic social investments and philanthropy	
Best practices	Reference
Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy	<ul style="list-style-type: none"> • <i>Performance overview, Material topics (Responsible citizenship)</i> and <i>ESG Data Book</i> in SR21 • Group Social Performance Policy
Coordinate efforts with other organisations and initiatives to amplify and not negate or unnecessarily duplicate the efforts of other contributors	<ul style="list-style-type: none"> • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • Group Social Performance Policy
Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups	<ul style="list-style-type: none"> • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • Group Social Performance Policy

Criterion 17: The COP describes advocacy and public policy engagement	
Best practices	Reference
Publicly advocate the importance of action in relation to one or more UN goals/issues	<ul style="list-style-type: none"> • <i>Chairman’s introduction</i> and <i>CEO review</i> in SR21
Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues	

Criterion 18: The COP describes partnerships and collective action	
Best practices	Reference
Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy	<ul style="list-style-type: none"> • <i>Material topics (Human rights, Responsible citizenship and Responsible sourcing and supply) in SR21</i> • A member of the Fair Cobalt Alliance, which works to positively address artisanal and small-scale mining in the DRC
Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain	<ul style="list-style-type: none"> • Membership of International Council on Mining and Metals, Extractive Industry Transparency Initiative (EITI) and Voluntary Principles on Human Rights and Security • Engagement in EITI and OECD working groups • <i>Section 172 statement and stakeholder engagement in AR21</i> • <i>Stakeholder engagement in SR21</i>

Corporate sustainability governance and leadership

Criterion 19: The COP describes CEO commitment and leadership	
Best practices	Reference
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	<ul style="list-style-type: none"> • <i>CEO review</i> in SR21
CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	<ul style="list-style-type: none"> • <i>Section 172 statement and stakeholder engagement</i> and <i>Corporate governance report</i> in AR21 • <i>CEO review</i> and <i>Stakeholder engagement</i> in SR21
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	<ul style="list-style-type: none"> • <i>CEO review</i> and <i>Sustainability governance</i> in SR21
Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team	<ul style="list-style-type: none"> • Our Chief Executive's annual bonus scorecard comprises of 55% financial measures, 30% HSEC (safety and climate), and 15% individual targets.

Criterion 20: The COP describes Board adoption and oversight	
Best practices	Reference
Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance	<ul style="list-style-type: none"> • <i>Sustainability and Corporate governance report</i> in AR21 • <i>Sustainability governance</i> in SR21
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	<ul style="list-style-type: none"> • <i>Sustainability and Corporate governance report</i> in AR21 • <i>Sustainability governance</i> in SR21
Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)	<ul style="list-style-type: none"> • Our Board and its relevant committees review and as appropriate approve our Group reports: <i>Sustainability and Corporate governance report</i> in AR21 and <i>Sustainability governance</i> in SR21

Criterion 21: The COP describes stakeholder engagement	
Best practices	Reference
Publicly recognise responsibility for the company's impacts on internal and external stakeholders	<ul style="list-style-type: none"> • <i>Code of Conduct</i> • <i>Section 172 statement and stakeholder engagement</i> in AR21 • <i>Stakeholder engagement</i> in SR21
Define sustainability strategies, goals and policies in consultation with key stakeholders	<ul style="list-style-type: none"> • <i>Section 172 statement and stakeholder engagement</i> in AR21 • <i>Stakeholder engagement</i> and <i>Material topics (Responsible citizenship)</i> in SR21
Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	<ul style="list-style-type: none"> • <i>Section 172 statement and stakeholder engagement</i> in AR21 • <i>Stakeholder engagement</i> and <i>Material topics (Responsible citizenship)</i> in SR21

Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect ‘whistle-blowers’	<ul style="list-style-type: none"> • Code of Conduct • Glencore Social Performance Policy • Glencore Corporate Communications Policy • Raising Concerns Programme • Glencore Whistleblowing Policy • <i>Our people</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship, Our People)</i> in SR21
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Business and Peace

Criterion A: Policies and practices related to the company’s core business operations in high-risk or conflict-affected areas	
Best practices	Reference
Information on how policies, strategies and operating practices have been adapted to the specific high-risk/conflict context based on due diligence	<ul style="list-style-type: none"> • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21
Adherence to best practices even where national law sets a lower standard, including in the management of security services	<ul style="list-style-type: none"> • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • <i>Key topics</i> in E&CR21
Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices	<ul style="list-style-type: none"> • Code of Conduct • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • <i>Our business partners</i> in E&CR21

Criterion B: Policies and practices related to the company’s government relations in high-risk or conflict-affected areas	
Best practices	Reference
Measures undertaken to avoid complicity in human rights violations by government actors	<ul style="list-style-type: none"> • Glencore Human Rights Policy • Glencore Political Engagement Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21
Management practices aimed at preventing corrupt relationships with government officials	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy • Glencore Human Rights Policy • Glencore Political Engagement Policy • Glencore Responsible Sourcing Policy • Supplier Code of Conduct • <i>Ethics and compliance</i> in AR21 • <i>Material topics (Human rights, Responsible citizenship)</i> in SR21 • <i>Our approach</i> in E&CR21

Criterion C: Local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas

Best practices	Reference
Stakeholder engagement mechanisms across company and contractor operations	<ul style="list-style-type: none"> • Glencore Social Performance Policy • <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR21
Approaches to stakeholder engagement involving civil society, international organisations, etc.	<ul style="list-style-type: none"> • Glencore Social Performance Policy • <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR21
Actions towards constructive and peaceful company/community engagement	<ul style="list-style-type: none"> • Glencore Social Performance Policy • <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR21
Sustainable social investment projects	<ul style="list-style-type: none"> • Glencore Social Performance Policy • <i>Material topics (Responsible citizenship)</i> in SR21

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