

# GLENCORE

## **UNITED NATIONS GLOBAL COMPACT** Communication on Progress in 2019

# UN Global Compact Communication on Progress 2019

## Contents

CEO statement of support .....	3
The Ten Principles of the UN Global Compact.....	4
UN Global Compact Communication on Progress 2019 and GC Advanced COP Self-Assessment.....	5
Implementing UNGC principles into strategies and operations .....	6
Implementing the Ten Principles .....	8
Human rights.....	8
Labour standards .....	9
Environment .....	9
Anti-corruption .....	10
Robust human rights management policies and procedures .....	11
Robust labour management policies and procedures .....	15
Robust environmental management policies and procedures.....	18
Robust anti-corruption management policies and procedures.....	21
Taking action in support of broader UN goals and issues.....	23
Corporate sustainability governance and leadership .....	26
Business and Peace .....	27

## CEO statement of support

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

As Chief Executive Officer (CEO) of the 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. As one of the world's natural resource companies, we produce, process and market commodities and are committed to operating in a transparent and responsible manner.

Our approach to sustainability consists of our corporate strategy, our six values, our Code of Conduct, our Group Sustainability strategy and our Group HSEC policies, with additional policies specific to individual operations. These align with the UNGC and its principles. Our Code of Conduct and Group HSEC policies apply to our workforce, both our direct employees and our contractors, across all of our assets.

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

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

Our 2019 Communication on Progress 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 a number of other publications, including our Group policies and our *Modern Slavery Statement*, which reports on our management of the risks related to modern slavery in our supply chain. All of these publications are available at [www.glencore.com](http://www.glencore.com), where further information on our approach to sustainability is also available.

**Ivan Glasenberg**  
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 2019 and GC Advanced COP Self-Assessment

We have compiled all of the information in Glencore's Communication on Progress 2019 from the following publicly available publications:

- Annual Report 2019 (AR19)
- Sustainability Report 2019 (SR19)
- ESG and GRI Data Book 2019 (ESG19)
- Human Rights Report 2019 (HRR19)
- Water Report 2019 (WR19)
- Modern Slavery Statement 2019 (MSS19)
- Our Values
- Code of Conduct
- Group Human Rights Policy
- Group Anti-Corruption Policy
- Group Sustainability Policy
- Group Supplier Standards (Supplier Standards)

These are available on our website: [www.glencore.com](http://www.glencore.com)

Our Communication on Progress also references a number of internal documents.

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 UNGC principles into strategies and operations

<b>Criterion 1:</b> The COP describes mainstreaming into corporate functions and business units	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Sustainability and Corporate Governance report</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>
Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy	<ul style="list-style-type: none"> <li>• <i>Chairman's introduction, CEO statement, Investment case, Our strategy for a sustainable future and Sustainability</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>
Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary	<ul style="list-style-type: none"> <li>• <i>Sustainability governance</i> in SR19</li> <li>• <i>Group HSEC Strategic Overview</i> (internal document)</li> </ul>
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"> <li>• <i>Chairman's introduction, CEO statement, Investment case, Our strategy for a sustainable future and Sustainability</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>
Ensure that different corporate functions coordinate closely to maximise performance and avoid unintended negative impacts	<ul style="list-style-type: none"> <li>• <i>Investment case and Our strategy for a sustainable future</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>
Other established or emerging best practices	<ul style="list-style-type: none"> <li>• <i>Sustainability governance, Material topics and Stakeholder engagement</i> in SR19</li> </ul>

<b>Criterion 2: The COP describes value chain implementation</b>	
<b>Best practices</b>	<b>Reference</b>
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Supplier Standards</li> <li>• <i>Investment case, Our market and emerging drivers, Business model, Our strategy for a sustainable future and Principal risks and uncertainties</i> in AR19</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> </ul>
Communicate policies and expectations to suppliers and other relevant business partners	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• Group Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Business model, Section 172 statement and stakeholder engagement, Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> </ul>
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	<ul style="list-style-type: none"> <li>• Group Human Rights Policy</li> <li>• Group Anti-Corruption Policy</li> <li>• Raising Concerns platform</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance and Corporate Governance report</i> in AR19</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> <li>• <i>Coal: Undertaking supply chain due diligence case study</i> in SR19</li> <li>• <i>Nickel: Responsibly producing cobalt case study</i> in SR19</li> </ul>
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• Group Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> <li>• <i>Coal: Undertaking supply chain due diligence case study</i> in SR19</li> <li>• <i>Nickel: Responsibly producing cobalt case study</i> in SR19</li> <li>• HRR19</li> <li>• MSS19</li> </ul>
Other established or emerging best practices	<ul style="list-style-type: none"> <li>• Supplier Standards</li> <li>• <i>Stakeholder engagement and Material topics (Responsible sourcing and supply)</i> in SR19</li> </ul>

## 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 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 assets require additional security.

Our Group 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 operational managers. Risk assessment is fundamental to our Group approach: we require each 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 assets must also operate grievance mechanisms that are accessible, accountable and fair, which let our stakeholders raise concerns without fear of recrimination. Assets also 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.

We publish information that specifically addresses these two principles in:

- Code of Conduct
- Group Human Rights Policy
- Supplier Standards
- *Material topics (Human rights, Responsible citizenship)* in SR19
- MSS19
- WR19



## Labour standards

The next four principles relate to labour standards.

Our people are our greatest asset. We treat all our people 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 equal opportunity policy at every level of the Group. We uphold the ILO Declaration on Fundamental Principles and Rights at Work.

Within all our 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.

We recognise and uphold the rights of our people, 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
- Group Human Rights Policy
- Supplier Standards
- *Our people* in AR19
- *Material topics (Human rights, Responsible citizenship, Our people)* in SR19
- HRR19
- MSS19

## 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. Our Group Environmental Policy (internal document) aligns with international environmental standards, including ISO 14001.

Our Group Environmental Policy requires our assets to undertake detailed risk assessment reviews, and identify appropriate mitigation action where necessary. Our 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. 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, including

high-efficiency low-emission (HELE) coal power generation technologies. We have financially supported development of these technologies, including the Callide Oxyfuel Project in Australia. In addition, our coal business has established a wholly-owned, non-profit subsidiary, Carbon Transport and Storage Company (CTSCo), a leading a carbon capture and storage project. We established the CTSCo project to demonstrate the technical viability, integration and safe operation of CCS in Surat Basin, Australia.

We publish information that specifically addresses these three principles in:

- Code of Conduct
- Group Environmental Policy (internal document)
- *Climate change* in AR19
- *Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship)* in SR19
- WR19

### 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 Business Ethics Committee.

We publish information that specifically addresses this principle in:

- Code of Conduct
- Glencore Global Anti-Corruption Policy
- *Ethics and compliance* in AR19

## 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.

<b>Criterion 3:</b> The COP describes robust commitments, strategies or policies in the area of human rights	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Chairman’s introduction, CEO review and Material topics (Human rights, Our people)</i> in SR19</li> </ul>
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"> <li>• Group Human Rights Policy</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• Supplier Standards</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• Supplier Standards</li> </ul>

<b>Criterion 4:</b> The COP describes effective management systems to integrate the human rights principles	
<b>Best practices</b>	<b>Reference</b>
Process to ensure that internationally recognised human rights are respected	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> <li>• <i>Coal: Undertaking supply chain due diligence, working in partnership for peace and sustainable development and Identifying and responding to human rights risks case studies</i> in SR19</li> <li>• <i>Copper: Addressing artisanal mining and Addressing security performance case studies</i> in SR19</li> <li>• <i>Nickel: Responsibly producing cobalt case study</i> in SR19</li> <li>• HRR19</li> </ul>
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"> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR19</li> <li>• HRR19</li> </ul>
Internal awareness-raising and training on human rights for management and employees	<ul style="list-style-type: none"> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> and <i>Our people</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible sourcing and supply, Our people)</i> in SR19</li> <li>• HRR19</li> <li>• MSS19</li> </ul>
Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 +ARE 4)	<ul style="list-style-type: none"> <li>• Raising Concerns platform</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> <li>• <i>Oil: Responding to local concerns</i> case study in SR19</li> <li>• HRR19</li> </ul>
Allocation of responsibilities and accountability for addressing human rights impacts	<ul style="list-style-type: none"> <li>• HSEC Strategic Overview (internal document)</li> <li>• <i>Sustainability governance</i> and <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR19</li> <li>• HRR19</li> </ul>
Internal decision-making, budget and oversight for effective responses to human rights impacts	<ul style="list-style-type: none"> <li>• HSEC Strategic Overview (internal document)</li> <li>• <i>Sustainability governance</i> in SR19</li> <li>• HRR19</li> </ul>
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"> <li>• Raising Concerns platform</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> <li>• <i>Coal: Identifying and responding to human rights risks</i> case study in SR19</li> <li>• <i>Copper: Addressing security performance</i> case study in SR19</li> <li>• <i>Oil: Responding to local concerns</i> case study in SR19</li> <li>• HRR19</li> </ul>
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"> <li>• <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR19</li> <li>• <i>Coal: Responsible citizenship in South Africa, Supporting farmers to become sustainable businesses and Increasing the participation of indigenous Australians in our business</i> case studies in SR19</li> <li>• <i>Copper: Addressing artisanal mining, Improving and expanding irrigation infrastructure, Improving drinking water and sanitation services and Encouraging indigenous employment</i> case studies in SR19</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Ferroalloys: Supporting public health initiatives</i> case study in SR19</li> <li>• <i>Nickel: Responsibly producing cobalt</i> case study in SR19</li> <li>• <i>Oil: Handing over the Bemangra health and maternity centre to local authorities, Delivering primary education to Melom village, Supporting a secure water supply and Developing a sustainable livelihood</i> case studies in SR19</li> <li>• <i>Zinc: Encouraging indigenous employment</i> case study in SR19</li> <li>• HRR19</li> </ul>
--	---

<b>Criterion 5:</b> The COP describes effective monitoring and evaluation mechanisms of human rights integration	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• Supplier Standards</li> <li>• Asset and Group-level assurance programmes (internal process)</li> <li>• Annual report on progress submitted to the Voluntary Principles</li> <li>• HRR19</li> <li>• MSS19</li> </ul>
Monitoring drawn from internal and external feedback, including affected stakeholders	<ul style="list-style-type: none"> <li>• <i>Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR19</li> <li>• <i>Coal: Undertaking supply chain due diligence, Working in partnership for peace and sustainable development and Identifying and responding to human rights risks</i> case studies in SR19</li> <li>• <i>Copper: Addressing artisanal mining and Addressing security performance</i> case studies in SR19</li> <li>• <i>Nickel: Responsibly producing cobalt</i> case study in SR19</li> <li>• HRR19</li> </ul>
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> <li>• Raising Concerns platform</li> <li>• <i>Sustainability governance and Material topics (Human rights, Responsible citizenship, Responsible sourcing and supply)</i> in SR19</li> </ul>
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"> <li>• Raising Concerns platform</li> <li>• <i>Ethics and compliance in AR19</i></li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> </ul>
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> </ul>

learning, and based on engagement and dialogue (BRE4 + ARE4)	<ul style="list-style-type: none"> <li>• Group Community and Stakeholder Engagement Policy (internal document)</li> <li>• Raising Concerns platform</li> <li>• <i>Ethics and compliance in AR19</i></li> <li>• <i>Material topics (Human rights) in SR19</i></li> </ul>
Outcomes of integration of the human rights principles	<ul style="list-style-type: none"> <li>• <i>Ethics and compliance in AR19</i></li> <li>• <i>Material topics (Human rights) in SR19</i></li> <li>• <i>Coal: Identifying and responding to human rights risks case study in SR19</i></li> <li>• <i>Copper: Addressing security concerns case study in SR19</i></li> <li>• <i>Oil: Responding to local concerns case study in SR19</i></li> </ul>

## 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.

<b>Criterion 6:</b> The COP describes robust commitments, strategies or policies in the area of labour	
<b>Best practices</b>	<b>Reference</b>
Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• <i>Our people</i> in AR19</li> <li>• <i>Stakeholder engagement and Material topics (Our people)</i> in SR19</li> <li>• HRR19</li> <li>• MMS19</li> </ul>
Reflection on the relevance of the labour principles for the company	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• <i>Our people</i> in AR19</li> <li>• <i>Material topics (Our people)</i> in SR19</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• Supplier Standards</li> <li>• <i>Our people</i> in AR19</li> <li>• <i>Material topics (Our people)</i> in SR19</li> </ul>
Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation	<p><i>Examples: Inclusion of vulnerable/discriminated groups in the workforce (eg women, disabled, migrant, HIV/AIDS, older/younger workers); equal pay for work of equal value; contribution to national strategies to eliminate child/forced labour, etc.</i></p> <ul style="list-style-type: none"> <li>• <i>Coal: Increasing the participation of indigenous Australians in our business case study</i> in SR19</li> <li>• <i>Copper: Encouraging indigenous employment case study</i> in SR19</li> <li>• <i>Oil: Successfully integrating workforces case study</i> in SR19</li> <li>• <i>Zinc: Encouraging indigenous employment case study</i> in SR19</li> </ul>
Participation and leadership by employers' organisations (international and national) to jointly address challenges related to labour standards in the countries of operation, possibly	N/A

in a tripartite approach (business – trade union – government).	
Structural engagement with a global union, possibly via a Global Framework Agreement	N/A

<b>Criterion 7: The COP describes effective management systems to integrate the labour principles</b>	
<b>Best practices</b>	<b>Reference</b>
Risk and impact assessments in the area of labour	<ul style="list-style-type: none"> <li>• <i>Our people</i> and <i>Principal risks and uncertainties</i> in AR19</li> <li>• <i>Material topics (Our people)</i> in SR19</li> <li>• HRR19</li> <li>• MSS19</li> </ul>
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<ul style="list-style-type: none"> <li>• <i>Our people</i> in AR19</li> <li>• <i>Stakeholder engagement and Material topics (Our people)</i> in SR19</li> </ul>
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> <li>• Group HSEC Strategic Overview (internal document)</li> <li>• <i>Our people</i> in AR19</li> <li>• <i>Sustainability governance and Material topics (Our people)</i> in SR19</li> </ul>
Internal awareness-raising and training on the labour principles for management and employees	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Our people)</i> in SR19</li> </ul>
Active engagement with suppliers to address labour-related challenges	<ul style="list-style-type: none"> <li>• Supplier Standards</li> <li>• <i>Our people</i> and <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> <li>• HRR19</li> <li>• MSS19</li> </ul>
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"> <li>• Group Human Rights Policy</li> <li>• Code of Conduct</li> <li>• Raising concerns platform</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights)</i> in SR19</li> </ul>



<b>Criterion 8:</b> The COP describes monitoring and evaluation mechanisms of labour principles integration	
<b>Best practices</b>	<b>Reference</b>
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> <li>• <i>Our people</i> in AR19</li> <li>• <i>Performance overview</i> in SR19</li> </ul>
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"> <li>• <i>Section 172 statement and stakeholder engagement</i> and <i>Our people</i> in AR19</li> <li>• <i>Stakeholder engagement</i> and <i>Material topics (Our people)</i> in SR19</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Supplier Standards</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> <li>• MSS19</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Supplier Standards</li> <li>• <i>Material topics (Responsible sourcing and supply)</i> in SR19</li> <li>• MSS19</li> </ul>
Outcomes of integration of the Labour principles	<ul style="list-style-type: none"> <li>• <i>Performance overview</i> and <i>Material topics (Our people)</i> in SR19</li> <li>• ESG19</li> </ul>

## 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.

<b>Criterion 9:</b> The COP describes robust commitments, strategies or policies in the area of environmental stewardship	
<b>Best practices</b>	<b>Reference</b>
Reference to relevant international conventions and other international instruments (eg Rio Declaration on Environment and Development)	<ul style="list-style-type: none"> <li>• We map and align our policies with relevant international standards and relevant best practice.</li> <li>• <i>Chairman’s introduction, CEO review and Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship)</i> in SR19</li> <li>• WR19</li> </ul>
Reflection on the relevance of environmental stewardship for the company	<ul style="list-style-type: none"> <li>• <i>Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship)</i> in SR19</li> <li>• <i>Coal: Optimising Lakenvlei’s wetland rehabilitation offset, Achieving rehabilitation certification at Rolleston Open Cut and Successfully closing West Wallsend mine</i> case studies in SR19</li> <li>• <i>Ferroalloys: Working in partnership to reduce emissions and energy costs</i> case study in SR19</li> <li>• <i>Nickel: Progressing the Onaping Depth Project and Generating power from wind</i> case studies in SR19</li> <li>• <i>Oil: Training the local community in land stewardship</i> case study in SR19</li> <li>• <i>Zinc: Returning a smelter to a natural state</i> case study in SR19</li> <li>• WR19</li> </ul>
Written company policy on environmental stewardship	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Environmental Policy (internal document)</li> <li>• Supplier Standards</li> </ul>
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Group Environmental Policy</li> <li>• Supplier Standards</li> <li>• WR19</li> </ul>
Specific commitments and goals for specified years	<ul style="list-style-type: none"> <li>• <i>Performance overview and Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship and Responsible sourcing and supply)</i> in SR19</li> <li>• WR19</li> </ul>

<b>Criterion 10:</b> The COP describes effective management systems to integrate the environmental principles	
<b>Best practices</b>	<b>Reference</b>
Environmental risk and impact assessments	<ul style="list-style-type: none"> <li>• Group Environmental Policy (internal document)</li> <li>• <i>Climate change and Principal risks and uncertainties</i> in AR19</li> <li>• <i>Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship and Responsible sourcing and supply)</i> in SR19</li> <li>• WR19</li> </ul>
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<ul style="list-style-type: none"> <li>• <i>Material topics (Catastrophic hazard management, Climate change and energy, Water, Land stewardship and Responsible sourcing and supply)</i> in SR19</li> <li>• <i>Coal: Supporting research into low emissions technology, Achieving rehabilitation certification at Rolleston Open Cut and Successful closing West Wallsend mine</i> case studies in SR19</li> <li>• <i>Ferroalloys: Working in partnership to reduce emissions and energy costs</i> case study in SR19</li> <li>• <i>Nickel: Progressing the Onaping Depth Project and Generating power from wind</i> case studies in SR19</li> <li>• <i>Zinc: Returning a smelter to a natural state and Suppressing dust at a tailings storage facility</i> case studies in SR19</li> <li>• WR19</li> </ul>
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> <li>• Group HSEC Strategic Overview (internal document)</li> <li>• Group Environmental Policy (internal document)</li> <li>• <i>Climate change</i> in AR19</li> <li>• <i>Material topics (Water, Land stewardship and Responsible sourcing and supply)</i> in SR19</li> </ul>
Internal awareness-raising and training on environmental stewardship for management and employees	<ul style="list-style-type: none"> <li>• Group Environmental Policy (internal document)</li> <li>• <i>Climate change</i> in AR19</li> <li>• <i>Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship)</i> in SR19</li> </ul>

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"> <li>• Code of Conduct</li> <li>• Group Human Rights Policy</li> <li>• Raising concerns platform</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance in AR19</i></li> <li>• <i>Material topics (Human rights, Responsible citizenship) in SR19</i></li> </ul>
---	---

<b>Criterion 11:</b> The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	
<b>Best practices</b>	<b>Reference</b>
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> <li>• Group Environmental Policy (internal document)</li> <li>• <i>Performance overview and Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship) in SR19</i></li> <li>• ESG19</li> <li>• WR19</li> </ul>
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> <li>• Group Environmental Policy (internal document)</li> <li>• <i>Corporate Governance report in AR19</i></li> <li>• <i>Sustainability governance and Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship) in SR19</i></li> </ul>
Process to deal with incidents	<ul style="list-style-type: none"> <li>• Group Catastrophic and Fatal Hazard Management Policy (internal document)</li> <li>• Group Emergency Response and Crisis Management Policy (internal document)</li> </ul>
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• <i>Material topics (Catastrophic hazard management, Climate change, Water and effluents, Waste and air emissions) in SR19</i></li> <li>• WR19</li> </ul>
Outcomes of integration of the environmental principles	<ul style="list-style-type: none"> <li>• <i>Performance overview and Material topics (Catastrophic hazard management, Climate change and energy, Water and Land stewardship) in SR19</i></li> <li>• ESG19</li> </ul>

## Robust anti-corruption management policies and procedures

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

<b>Criterion 12:</b> The COP describes robust commitments, strategies or policies in the area of anti-corruption	
<b>Best practices</b>	<b>Reference</b>
Publicly stated formal policy of zero-tolerance of corruption (D1)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Detailed policies for high-risk areas of corruption (D4)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> </ul>
Policy on anti-corruption regarding business partners (D5)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> </ul>

<b>Criterion 13:</b> The COP describes effective management systems to integrate the anti-corruption principle	
<b>Best practices</b>	<b>Reference</b>
Support by the organization's leadership for anti-corruption (B4)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Carrying out risk assessment of potential areas of corruption	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	<ul style="list-style-type: none"> <li>• <i>Ethics and compliance</i> and <i>Corporate Governance report</i> in AR19</li> </ul>
Actions taken to encourage business partners to implement anti-corruption commitments (D6)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Supplier Standards</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Corporate Governance report</i> in AR19</li> </ul>

Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Internal accounting and auditing procedures related to anticorruption	<ul style="list-style-type: none"> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>

<b>Criterion 14:</b> The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	
<b>Best practices</b>	<b>Reference</b>
Leadership review of monitoring and improvement results (D12)	<ul style="list-style-type: none"> <li>• <i>Corporate Governance report</i> in AR19</li> </ul>
Process to deal with incidents (D13)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>
Public legal cases relating to corruption	
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"> <li>• <i>Ethics and compliance</i> in AR19</li> </ul>

## Taking action in support of broader UN goals and issues

<b>Criterion 15:</b> The COP describes core business contributions to UN goals and issues	
<b>Best practices</b>	<b>Reference</b>
Align core business strategy with one or more relevant UN goals/issues	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• <i>Investment case</i> and <i>Our strategy for a sustainable future</i> in AR19</li> <li>• <i>Chairman’s introduction, CEO review Performance overview</i> and <i>Stakeholder engagement</i> in SR19</li> </ul>
Develop relevant products and services or design business models that contribute to UN goals/issues	<ul style="list-style-type: none"> <li>• <i>Investment case</i> and <i>Our strategy for a sustainable future</i> in AR19</li> <li>• <i>Stakeholder engagement</i> and <i>Material topics</i> in SR19</li> <li>• HRR19</li> <li>• MSS19</li> <li>• WR19</li> </ul>
Adopt and modify operating procedures to maximise contribution to UN goals/issues	<ul style="list-style-type: none"> <li>• <i>Investment case, Our strategy for a sustainable future</i> and <i>Climate change</i> in AR19</li> <li>• <i>Material topics</i> in SR19</li> <li>• ESG19</li> <li>• HRR19</li> <li>• MSS19</li> <li>• WR19</li> </ul>

<b>Criterion 16:</b> The COP describes strategic social investments and philanthropy	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Performance overview</i> and <i>Material topics (Responsible citizenship)</i> in SR19</li> <li>• <i>Coal: Responsible citizenship in South Africa</i> and <i>Increasing the participation of indigenous Australians in our business</i>, case studies in SR19</li> <li>• <i>Copper: Addressing artisanal mining, Improving and expanding irrigation infrastructure, Improving drinking water and sanitation services</i> and <i>Encouraging indigenous employment</i>, case studies in SR19</li> <li>• <i>Ferroalloys: Supporting the next generation of our workforce, Supporting emerging enterprise and suppliers</i> and <i>Supporting public health initiatives</i>, case studies in SR19</li> <li>• <i>Oil: Training the local community in land stewardship, Handing over the Bemangra Health and Maternity Centre to local authorities, Delivering primary education to Melom village, Supporting a secure water supply</i> and <i>Developing a sustainable livelihood</i>, case studies in SR19</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Zinc: Encouraging indigenous employment case study in SR19</i></li> <li>• ESG19</li> </ul>
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"> <li>• <i>Material topics (Human rights, Responsible citizenship) in SR19</i></li> </ul>
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"> <li>• <i>Material topics (Human rights, Responsible citizenship) in SR19</i></li> </ul>

**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"> <li>• <i>Chairman’s introduction and CEO review in SR19</i></li> </ul>
Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues	Glencore’s Chairman, Tony Hayward, has spoken at a number of events regarding climate change

**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"> <li>• <i>Material topics (Human rights, Responsible citizenship and Responsible sourcing and supply) in SR19</i></li> <li>• <i>Coal: Supporting research into low emissions technology, Undertaking supply chain due diligence, Working in partnership for peace and sustainable development, Identify human rights risks, Supporting farmers to become sustainable businesses, Strengthening social licence to operate and Increasing the participation of indigenous Australians in our business case studies in SR19</i></li> <li>• <i>Copper: Addressing artisanal mining, Improving and expanding irrigation infrastructure, improving drinking water and sanitation services and Encouraging indigenous employment case studies in SR19</i></li> <li>• <i>Ferroalloys: Supporting the next generation of our workforce and Supporting public health initiatives case study in SR19</i></li> <li>• <i>Nickel: Responsibly producing cobalt case study in SR19</i></li> <li>• <i>Oil: Handing over the Bemangra Health and Maternity Centre to local authorities, Delivering primary education to Melom village, supporting a secure water supply</i></li> </ul>



	<p>and Developing a sustainable livelihood case studies in SR19</p> <ul style="list-style-type: none"> <li>• <i>Zinc: Encouraging indigenous employment case study in SR19</i></li> </ul>
<p>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</p>	<ul style="list-style-type: none"> <li>• Membership of International Council on Mining and Metals and Voluntary Principles on Human Rights and Security</li> <li>• Engagement in EITI and OECD working groups</li> <li>• <i>Section 172 statement and stakeholder engagement in AR19</i></li> <li>• <i>Stakeholder engagement in SR19</i></li> <li>• MSS19</li> </ul>

## Corporate sustainability governance and leadership

<b>Criterion 19:</b> The COP describes CEO commitment and leadership	
<b>Best practices</b>	<b>Reference</b>
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	<ul style="list-style-type: none"> <li>• <i>CEO review</i> in SR19</li> </ul>
CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	<ul style="list-style-type: none"> <li>• <i>Section 172 statement and stakeholder engagement</i> and <i>Corporate governance report</i> in AR19</li> <li>• <i>CEO review</i> and <i>Stakeholder engagement</i> in SR19</li> </ul>
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	<ul style="list-style-type: none"> <li>• <i>CEO review</i> and <i>Sustainability governance</i> in SR19</li> </ul>
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"> <li>• Our CEO and executive management team have substantial shareholdings in Glencore, closely aligning their interests with the prospects of the company. As a company, we recognise that we will only deliver our full value through the integration of sustainability throughout our business.</li> </ul>

<b>Criterion 20:</b> The COP describes Board adoption and oversight	
<b>Best practices</b>	<b>Reference</b>
Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance	<ul style="list-style-type: none"> <li>• <i>Sustainability and Corporate Governance report</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.	<ul style="list-style-type: none"> <li>• <i>Sustainability and Corporate Governance report</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>
Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)	<ul style="list-style-type: none"> <li>• <i>Sustainability and Corporate Governance report</i> in AR19</li> <li>• <i>Sustainability governance</i> in SR19</li> </ul>

<b>Criterion 21:</b> The COP describes stakeholder engagement	
<b>Best practices</b>	<b>Reference</b>
Publicly recognise responsibility for the company's impacts on internal and external stakeholders	<ul style="list-style-type: none"> <li>• <i>Code of Conduct</i></li> <li>• <i>Section 172 statement and stakeholder engagement</i> in AR19</li> <li>• <i>Stakeholder engagement</i> in SR19</li> </ul>
Define sustainability strategies, goals and policies in consultation with key stakeholders	<ul style="list-style-type: none"> <li>• <i>Section 172 statement and stakeholder engagement</i> in AR19</li> <li>• <i>Stakeholder engagement</i> and <i>Material topics (Responsible citizenship)</i> in SR19</li> </ul>

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"> <li>• <i>Section 172 statement and stakeholder engagement</i> in AR19</li> <li>• <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR19</li> </ul>
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"> <li>• Code of Conduct</li> <li>• Group Community and Stakeholder Engagement Policy</li> <li>• Raising Concerns platform</li> <li>• <i>Our people</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship, Our People)</i> in SR19</li> </ul>

## Business and Peace

<b>Criterion A:</b> Policies and practices related to the company's core business operations in high-risk or conflict-affected areas	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> <li>• <i>Coal: Working in partnership for peace and sustainable development</i> case study in SR19</li> <li>• <i>Copper: Addressing artisanal mining</i> case study in SR19</li> </ul>
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"> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> </ul>
Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Coal: Undertaking supply chain due diligence</i> case study in SR19</li> <li>• <i>Copper: Addressing artisanal mining</i> case study in SR19</li> <li>• <i>Nickel: Responsibly producing cobalt</i> case study in SR19</li> </ul>

<b>Criterion B:</b> Policies and practices related to the company's government relations in high-risk or conflict-affected areas	
<b>Best practices</b>	<b>Reference</b>
Measures undertaken to avoid complicity in human rights violations by government actors	<ul style="list-style-type: none"> <li>• Glencore Human Rights Policy</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> </ul>
Management practices aimed at preventing corrupt relationships with government officials	<ul style="list-style-type: none"> <li>• Glencore Human Rights Policy</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Ethics and compliance</i> in AR19</li> <li>• <i>Material topics (Human rights, Responsible citizenship)</i> in SR19</li> </ul>

<b>Criterion C:</b> Local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas	
<b>Best practices</b>	<b>Reference</b>
Stakeholder engagement mechanisms across company and contractor operations	<ul style="list-style-type: none"> <li>• Glencore Community and Stakeholder Engagement Policy (internal document)</li> <li>• <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR19</li> </ul>
Approaches to stakeholder engagement involving civil society, international organisations, etc.	<ul style="list-style-type: none"> <li>• Glencore Community and Stakeholder Engagement Policy (internal document)</li> <li>• <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR19</li> </ul>
Actions towards constructive and peaceful company/community engagement	<ul style="list-style-type: none"> <li>• Glencore Community and Stakeholder Engagement Policy (internal document)</li> <li>• <i>Stakeholder engagement and Material topics (Responsible citizenship)</i> in SR19</li> </ul>
Sustainable social investment projects	<ul style="list-style-type: none"> <li>• Glencore Community and Stakeholder Engagement Policy (internal document)</li> <li>• <i>Material topics (Responsible citizenship)</i> in SR19</li> </ul>