

GLENCORE

HUMAN RIGHTS POLICY



Introduction

The United Nations Guiding Principles on Business and Human Rights (UNGPs) set out expectations for all businesses to respect human rights above and beyond compliance with national laws and regulations.

Our Human Rights Policy articulates the fundamental elements of Glencore's approach, and how we fulfil our commitment to respect human rights. The Glencore Board, through its Health, Safety, Environment and Communities (HSEC) Committee oversees our human rights activities which are embedded across the business.

Through our policies, standards and processes, we respect human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the UNGPs and the UN Global Compact.

This policy aligns with the International Council on Mining and Metals (ICMM) Mining Principles and the UN Sustainable Development Goals. It has been developed with input from people across our company, leading human rights experts, and members of societies where we operate including local residents, business partners, government and civil society.

Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc worldwide.

We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.

What is our commitment?

We are committed to respecting human rights in line with the UNGPs. We aim to:

- avoid causing, or contributing to, adverse human rights impacts
- prevent or mitigate adverse human rights impacts linked to our operations, products or services through our business relationships
- make a positive contribution to the advancement of human rights of all people, including vulnerable groups. In the event that we cause or contribute to an adverse impact on human rights, we provide for, or cooperate in, processes to enable an appropriate remedy.

Workplace

We respect the dignity and human rights of our workforce and our business partners, societies in which we live and work, and all others who may be affected by our activities. We expect our business partners to share our commitment and we leverage our business relationship to advance human rights.

Inclusion and diversity are essential to, and an integral part of, our business. We respect and value every employee and create a fair, supportive and inclusive working environment where people with diverse experiences and perspectives can develop and fulfil their potential. We prohibit unlawful discrimination on any basis. We do not tolerate any form of harassment or behaviour that is offensive, abusive or demeaning.



We recognise and uphold our employees' and contractors' right to a safe workplace. We identify, evaluate and control occupational health and safety hazards and strive to provide a work environment that is free from fatalities and injuries.

We respect our workforce's right to the freedom of association and the right to collective bargaining and we foster transparent and collaborative labour relations.

We do not tolerate child labour, any form of forced, compulsory or bonded labour, human trafficking or any other form of slavery and actively seek to identify and eliminate them from our supply chain.

We promote fair recruitment and employment practices so that all work is voluntary and fairly compensated.

Society

We respect the rights, interests and aspirations of Indigenous Peoples and acknowledge their right to maintain their culture, identity, traditions and customs. We operate in accordance with the ICMM Position Statement on Indigenous Peoples and Mining.

We work to obtain the free, prior and informed consent of Indigenous Peoples for new projects and changes to existing projects where significant adverse impacts are likely to occur, including as a result of relocation, disturbance of lands and territories or of critical cultural heritage. We seek, through good faith negotiation, to reach agreements with Indigenous Peoples who maintain an interest in, or connection to the land on which we operate, formalising engagement processes and sustainable benefits.

We seek to avoid involuntary resettlement wherever possible. Where it is unavoidable, we follow International Finance Corporation Performance Standard 5, which seeks to minimise the impact through full participation of affected stakeholders and a focus on building long-term productive livelihoods in a manner conducive to their well-being and human rights.

We support, implement and promote the Voluntary Principles on Security and Human Rights. We train our security employees and private security contractors on the Voluntary Principles and are clear about our expectations when engaging with public security.

We do not contribute to the financing of conflict either directly or through our supply chain, and we comply with relevant UN sanctions, resolutions or, where applicable, domestic laws implementing such resolutions.

We recognise the important role played by human rights defenders when supporting the rule of law, as well as their particular vulnerability to abuse. We are committed to engaging with them in these situations and respecting their rights. We communicate our expectation to private and public sector security providers that, respectively, they respect and protect the rights of human rights defenders in line with the UNGPs.

We understand the detrimental impact of corruption on the capacity for regions and nations to fully realise rights and benefits due to them from resource development. We support efforts to combat corruption including through transparency initiatives. We commit to disclose taxes, fees, and royalties related

to mineral extraction to governments in accordance with the principles set forth under the Extractive Industry Transparency Initiative.

Our approach

Our approach is based on increasing awareness of human rights, building capacity and promoting stakeholder dialogue.

We expect every leader across our business to be a strong role model for acting with integrity and promoting an ethical culture that respects the dignity and equality of all people. We implement training and awareness programmes to build capacity within our workforce, promoting human rights awareness, competencies and leadership.

We conduct human rights due diligence to identify, prevent and mitigate human rights risks and impacts across our business. We regularly review our salient human rights risks and publicly report on them.

We aim to build strong and trusting relationships in societies where we operate and pay special attention to the rights of vulnerable groups that may be impacted by our operations.

We operate grievance processes designed to be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on

engagement and dialogue. Where people have complaints or grievances, we aim to investigate and resolve them at a local level.

Glencore does not allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up or cooperating with an investigation. Our Raising Concerns platform is available to all stakeholders, including employees and contractors, and includes a 24/7 confidential reporting line. We continually monitor these processes to identify improvement opportunities.

We implement a due diligence process for metals and minerals in our supply chain, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Our Supplier Standards detail our expectations of our suppliers and process for evaluating their business practices. We commit to working collaboratively with our suppliers to mitigate identified actual or potential adverse human rights impacts in our supply chain.

We investigate human rights incidents to understand causes and contributing factors, and we take remedial actions to avoid them being repeated. We implement assurance processes in alignment with the ICMM Mining Principles and monitor and communicate our human rights performance.

Speaking Openly

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of the Code of Conduct and this policy with their manager, supervisor or via other available reporting channels. Our Raising Concerns platform is available to employees, contractors and external parties. Glencore takes concerns seriously and handles them promptly.

Glencore has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct and policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

Consequences

Our policies support our Values and Code of Conduct and reflect what is important to us. Glencore takes breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.



Additional resources

INTERNAL

Our Values
 Code of Conduct
 Anti-Corruption and Bribery Policy
 Diversity and Inclusion Policy
 Equality of Opportunity Policy
 Environmental Policy
 Health and Safety Policy
 Human Rights Policy
 Enterprise Risk Management Policy
 Social Performance Policy
 Tax Policy
 Human Rights Standard
 Health Standard
 Security Standard
 Social Performance Standard
 Supplier Standards

EXTERNAL

Extractive Industry Transparency Initiative
 International Council on Mining and Metals
 International Finance Corporation Performance Standard 5
 International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
 UN Global Compact
 UN Sustainable Development Goals
 UN Universal Declaration of Human Rights
 UN Guiding Principles on Business and Human Rights
 Voluntary Principles on Security and Human Rights

Our purpose

“Responsibly sourcing the commodities that advance everyday life”

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This policy has been approved by
the Board of Directors of Glencore plc

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