

# Our commitment to addressing modern slavery



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# Introduction

Glencore plc is committed to preventing the occurrence of modern slavery and human trafficking in our operations and supply chains. This Statement serves as a voluntary Statement under the UK Modern Slavery Act 2015 (UK Act) and a joint Statement under the Australian Modern Slavery Act 2018 (Cth) (Australian Act).<sup>1</sup>

For the purposes of this Statement, we have considered the definitions of modern slavery in both the UK and Australian Acts, which cover various forms of exploitation including:

- slavery, servitude and forced or compulsory labour;
- human trafficking;
- sexual exploitation and forced marriage;
- child labour;
- deceptive recruiting practices; and
- debt bondage.

These terms are also defined and recognised under international law.

Modern slavery is a global concern with long-lasting impacts on affected individuals and communities. We recognise our responsibility to work collaboratively with our suppliers, customers, workforce and external stakeholders to increase our understanding of modern slavery risks and the role we can play in seeking to address them where they exist.

<sup>1</sup> As discussed in the Board Approval section, Glencore plc approves this Statement on behalf of its Australian reporting entities.

We set out our commitment to zero tolerance for modern slavery in our workplaces and supply chains in our Code of Conduct, Supplier Standards and in our Group Human Rights Policy:

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

This annual statement sets out our approach to modern slavery, the steps we have taken and are taking, and our commitment to address risks of modern slavery in our organisation and supply chains.



# UK and Australian Modern Slavery Act Statement

This is our fifth Statement under the UK Act and our first under the Australian Act. It describes the activities we have undertaken to strengthen our processes and better understand and address the risks of modern slavery and human trafficking in our operations and supply chains during both Acts' reporting periods (1 April 2020 to 31 March 2021 for the UK Act and 1 January to 31 December 2020 for the Australian Act) and sets out the relevant section of this Statement where the criteria are addressed.

The table below maps the recommended reporting criteria for UK Modern Slavery Act (2015) statements to the mandatory criteria required by the Australian Modern Slavery Act (2018).

UK Modern Slavery Act recommended reporting criteria	Australian Modern Slavery Act mandatory reporting criteria	Glencore's response Section
	Identify the reporting entities	Appendix A
The organisation's structure, its business and its supply chains	Describe the structure, operations and supply chains of the reporting entity	Structure and operations of our business Our supply chains
	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Identifying and assessing risks of modern slavery in our business
The organisation's policies in relation to slavery and human trafficking  The organisation's due diligence processes in relation to slavery and human trafficking in its business and supply chains  The organisation's training and capacity building about slavery and human trafficking available to its staff	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Governance Supply chain due diligence Addressing geographic risk Strengthening workforce capacity
The organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness
	Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	Consultation
	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Next steps



# Our commitment to addressing modern slavery

Acknowledging that modern slavery is a real and global concern with long-lasting impacts on affected individuals and communities, we recognise our responsibility to work collaboratively with our suppliers, customers, workforce and external stakeholders to reduce the risks of modern slavery in our operations and supply chains. Further, consumers are increasingly scrutinising the supply chains of the products they consume, and so our customers are increasingly seeking reassurance that the materials they buy are produced sustainably and ethically. By taking action to mitigate modern slavery risks, we are also mitigating the risk of operational disruption that our business could face from the identification of modern slavery.

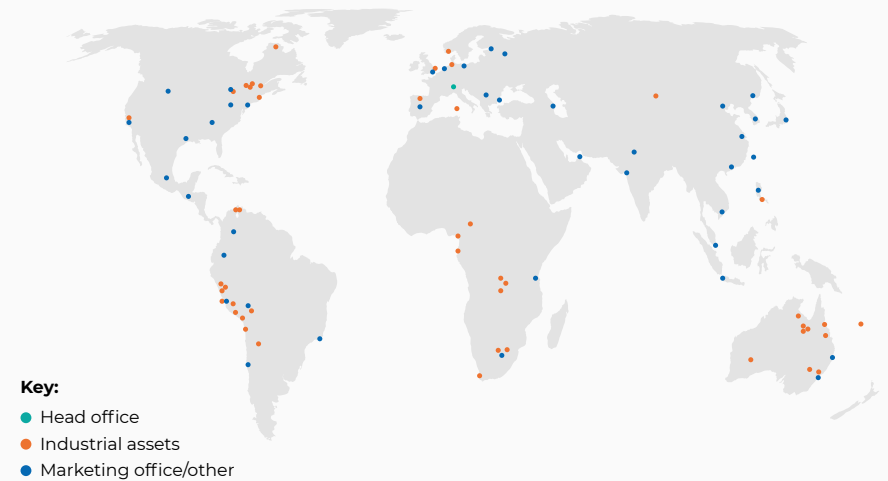
We produce and market resources that play an essential role in modern life. As a global company, we are conscious of the leverage we may have to influence others, and the important role we can play in reducing the exploitation of workers through increasing transparency and accountability in our supply chains.

While our geographic and product diversity provides challenges in ensuring the absence of modern slavery within our supply chains, 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 chains. In the event that we identify either a high-risk supplier or the presence of modern slavery in our supply chains, we would first work with the affected suppliers to improve their practices and safeguards. If these actions do not bring about sufficient change, we will end the relationship.

We are signatories to the United Nations' Global Compact, a set of principles covering human rights, labour, environment and anti-corruption. We operate in accordance with local laws and relevant international frameworks, including the Core Conventions of the International Labour Organization.

# Structure and operations of our business

Glencore is one of the world's largest natural resource companies. We employ around 135,000 people across over 35 countries, and produce and market more than 60 commodities.



**Structure and operations of our business**  
continued

As a global producer and marketer of commodities, we are uniquely diversified by geography, products and activities. The integration of our marketing and industrial businesses sets us apart from most of our competitors in creating an enhanced entrepreneurial focus on value generation.

**Inputs and resources on which our business model depends**

**ASSETS AND NATURAL RESOURCES**

- Our resources and reserves feature many long-life and high quality assets
- We are a disciplined producer, seeking to align supply with demand and value over volume
- Our established marketing operations have global reach and deep understanding of their respective markets

**OUR PEOPLE AND PARTNERS**

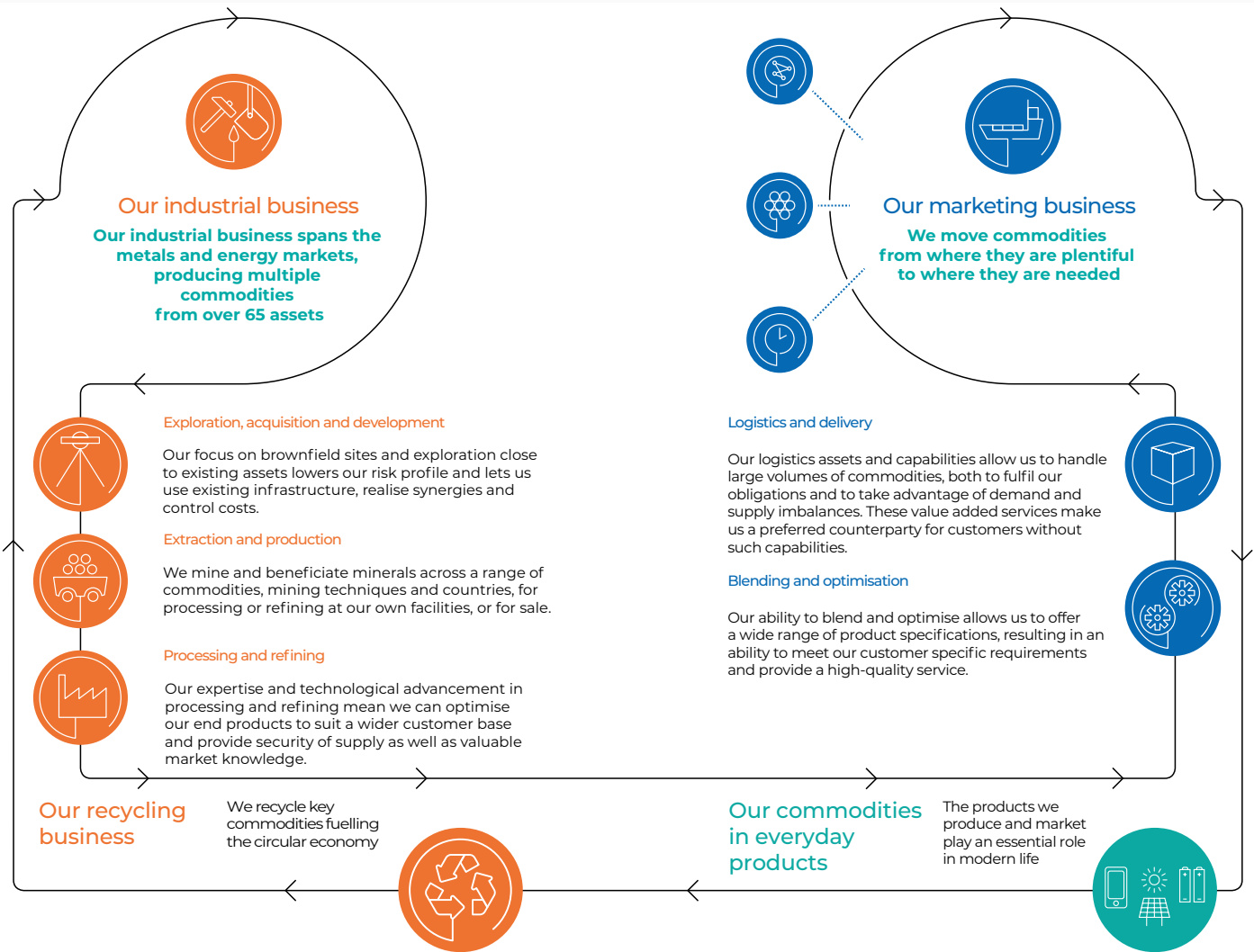
- We have established long-term relationships with a broad range of suppliers and customers across diverse industries and geographies
- c.135,000 employees and contractors spread across over 35 countries in both established and emerging regions for natural resources

**FINANCIAL DISCIPLINE**

- We seek to deploy capital in a disciplined manner, seeking to create value for all our stakeholders
- Our hedging strategies protect us against price risks and ensure that our marketing profitability is primarily determined by volume-driven activities and value-added services rather than absolute price

**UNIQUE MARKET KNOWLEDGE**

- As a significantly integrated commodity producer and marketer, we are uniquely positioned to generate value at every stage of the commodity chain





# Our supply chains

As a vertically integrated commodity supplier with a diverse commodity mix, our suppliers are critical partners in our commitment to deliver value and to operate in a manner that is responsible, transparent and respects the human rights of all. Our business is supported by varied supply chains which provides the goods, materials and services we need at different stages of our business. Our supply chains include multinational, regional, national and local suppliers.

**Glencore’s industrial assets engage approximately 34,000 suppliers across the world, with a total spend of around US\$13 billion (based on 2018 data). Suppliers to our industrial assets provide a wide range of goods, materials and services including contract workforce, equipment and technology.**

While we mine, process and produce our own products, we also physically source products from our global supplier base – and sell them to customers all over the world. We are one of the world’s leading marketers of physical commodities.

Our network of strategically located assets, including warehouses, ships, storage, port facilities and commodity processing plants, allows us to efficiently and safely transport commodities by sea, rail and truck, store and process them, and deliver to the time, quality and specification that our customers need.

We mitigate various risks in both our industrial and marketing supply chains through our ‘know-your-counterparty’ (KYC) process (a process designed to identify corruption, bribery, sanctions, money laundering and reputational risks) and supply chain due diligence assessments (designed to identify various supply chain risks, including modern slavery risk). There can be a correlation between corrupt activity and human rights abuse/modern slavery and, as such, our KYC process supports our activities to identify modern slavery.

## Industrial assets suppliers by region



- Australia, New Caledonia and the Philippines
- DRC, South Africa, and Zambia
- North America
- South America
- Europe



Responsible sourcing, or supply chains responsibility, is embedded within our supply chain strategy and is described further on page 14. Glencore is committed to taking into account social, ethical and environmental considerations when managing our relationships with suppliers and conducting supply chain due diligence to ensure our suppliers have approaches in place to address human rights risks in their own supply chains.

Our responsible sourcing strategy considers the production and sourcing of metals and minerals, as well as the procurement of goods and services. We work with relevant stakeholders, such as our workforce and suppliers to encourage responsible sourcing.

Our Supplier Standards (Standards) set out our expectations for responsible sourcing and supply due diligence throughout the commodity supply chains. Our Standards apply to individuals, organisations or companies that provide, sell or lease goods, services, or commodities directly to Glencore companies. More detail on our Standards is set out in the Supplier Standards section on pages 14 to 15.

Around 80% of our global procurement spend is with suppliers and contractors local to the countries where we operate. We are committed to purchasing products and services from suppliers that operate in a manner that is responsible, transparent and respects human rights.

### Non-controlled joint ventures

We have a non-controlling interest in four major mining assets: copper/zinc and coal assets in South America and a coal operation in Australia's Hunter Valley. In addition, we own 49.9% of Viterra<sup>1</sup>, formerly known as Glencore Agriculture.

We have a non-controlling interest in two oil production sharing contracts for Block I and Block O in Equatorial Guinea. Both Blocks are operated by Noble Energy, part of the Chevron group. In Cameroon, we have a non-controlling interest in an oil production sharing contract for the Bolongo field, which is operated by Perenco.

When appropriate, we seek to influence the independent management teams of these joint ventures to adopt equivalent policies and practices on responsible sourcing and supply.

<sup>1</sup> Viterra publishes a separate Modern Slavery Statement



# Addressing risk





# Identifying and assessing risks of modern slavery practices in our business

Our broad portfolio of assets results in diversity in our geographical locations, working conditions, organisational cultures and workforces. We recognise we have the potential to impact human rights directly through our operations, and indirectly through our relationships with joint ventures, contractors and suppliers.

We strive to maintain a culture of ethical behaviour and compliance throughout our business, which includes our commitment to preventing the occurrence of modern slavery and human trafficking across our global assets and supply chains.

Risk management is one of the core responsibilities of the Group's leadership and it is central to our decision-making processes. The Group's leadership fundamental duties as to risk management are:

- making a robust assessment of emerging and principal risks
- monitoring risk management and internal controls
- promoting a risk aware culture

The table below describes key risks we have identified in our operations and supply chains and identifies our mitigation activities at a high level. Actions taken to address modern slavery risk are dealt with in additional detail in the next section of the Statement.

Potential exposure to modern slavery	Associated modern slavery risk	Mitigation activities
Suppliers of goods and services to our Industrial assets	In 2018, Glencore developed a global risk assessment framework to assess human rights risk within its supplier base. The application of this framework identified our higher-risk countries (the Democratic Republic of Congo (DRC), Chad, Zimbabwe, the Philippines and Zambia) and higher-risk supply categories (security, transportation, facilities management (unskilled labour), textiles/garments/PPE, and construction labour)	Supply chain due diligence in our Industrial assets See section below
Suppliers to our Marketing business - purchasing third-party metals, minerals and energy products  Our marketing teams source commodities from the industrial assets that we fully or partly own, as well as from third-party suppliers. Our industrial assets work with our marketing teams, with our traders visiting these sites.	<p><b>Artisanal and small-scale mining (ASM)</b></p> <p>Glencore purchases commodities from third parties in countries where ASM is common. ASM represents an important livelihood and income source for many poverty-affected populations around the world. As the sector is largely un-mechanised and informal, it often presents significant safety and human rights risks, including the participation of children and the use of forced labour.</p> <p>Due to the link between child labour and artisanal mining, we conduct assurance to demonstrate to our stakeholders in our value chain that our product does not contain ore sourced from artisanal mining. Our engagement with those involved in ASM focuses on how ASM and large-scale mining can sustainably co-exist as distinct yet complementary sectors of a successful mining industry.</p> <p><b>Purchasing cobalt</b></p> <p>Glencore is one of the world's leading producers and marketer of cobalt, a metal in rising demand due to its use in batteries for electric vehicles and portable electronics. We produce cobalt mainly as a by-product of copper mining in the DRC, as well as from nickel mining in Australia and Canada. In the DRC, ASM is particularly prevalent near our operations where artisanal miners mine cobalt.</p> <p>While most of the cobalt we supply to the market is from our own operations, we also source some from a select group of third-party suppliers. Recognising the specific supply chain risks for cobalt, such as ASM, we prioritised rolling-out our enhanced supply chain due diligence process to our cobalt purchasing activities during 2020 and identified no significant adverse human rights impacts.</p> <p><b>Conflict minerals</b></p> <p>Conflict minerals are those where their extraction, trading, handling and export takes place in politically unstable areas and are used to finance non-stated owned armed groups (including the use of child soldiers), support corruption and money laundering. Conflict minerals are associated with severe human rights abuses, including unlawful killing, sexual violence, torture, forced and child labour.</p> <p>Currently, EU and US legislation identifies tantalum, tin, tungsten and gold, more commonly known as the 3TG, as conflict minerals. In 2020, as in previous years, Glencore did not produce, process or market any conflict minerals originating from the conflict areas.</p>	Supply chain due diligence in our Marketing business See section below



## Identifying and assessing risks of modern slavery practices in our business

continued

Potential exposure to modern slavery	Associated modern slavery risk	Mitigation activities																																								
<p><b>Geographic location</b></p> <p>We operate over 150 assets in 35 countries. Some of the countries in which we operate lack strong governance, which may lead to an increased risk of modern slavery in the in-country suppliers used by our assets.</p>	<p><b>Operations and suppliers in higher-risk jurisdictions</b></p> <p>To ensure our understanding of the potential risks within the locations of our assets and supply chains is current, we consider publications by leading organisations such as the Global Slavery Index (GSI) as guidance. The GSI prevalence estimate calculates the proportion of people living in modern slavery per 1,000 population.</p> <p>We use these resources to better understand the risks of modern slavery in the countries where our operations and local suppliers are based. Their assessments show that our operating countries with the highest prevalence of modern slavery are the DRC and Chad.</p> <table border="1"> <thead> <tr> <th>Key operating country</th> <th>GSI prevalence estimate</th> </tr> </thead> <tbody> <tr><td>Democratic Republic of Congo</td><td>13.71</td></tr> <tr><td>Chad</td><td>11.98</td></tr> <tr><td>Cameroon</td><td>6.87</td></tr> <tr><td>Equatorial Guinea</td><td>6.36</td></tr> <tr><td>Zambia (Glencore exited in March 2020)</td><td>5.74</td></tr> <tr><td>Kazakhstan</td><td>4.21</td></tr> <tr><td>South Africa</td><td>2.80</td></tr> <tr><td>Columbia</td><td>2.73</td></tr> <tr><td>Peru</td><td>2.56</td></tr> <tr><td>Italy</td><td>2.43</td></tr> <tr><td>Spain</td><td>2.27</td></tr> <tr><td>Bolivia</td><td>2.13</td></tr> <tr><td>United Kingdom</td><td>2.08</td></tr> <tr><td>Germany</td><td>2.04</td></tr> <tr><td>Switzerland</td><td>1.67</td></tr> <tr><td>Argentina</td><td>1.26</td></tr> <tr><td>Chile</td><td>0.78</td></tr> <tr><td>Australia</td><td>0.65</td></tr> <tr><td>Canada</td><td>0.48</td></tr> </tbody> </table> <p>Further details on the GSI and the methodology it uses to calculate estimates is available at: <a href="http://www.globalslaveryindex.org">www.globalslaveryindex.org</a></p>	Key operating country	GSI prevalence estimate	Democratic Republic of Congo	13.71	Chad	11.98	Cameroon	6.87	Equatorial Guinea	6.36	Zambia (Glencore exited in March 2020)	5.74	Kazakhstan	4.21	South Africa	2.80	Columbia	2.73	Peru	2.56	Italy	2.43	Spain	2.27	Bolivia	2.13	United Kingdom	2.08	Germany	2.04	Switzerland	1.67	Argentina	1.26	Chile	0.78	Australia	0.65	Canada	0.48	<p>Our approach to supplier due diligence seeks to achieve a balance between the country specific risks and the ability of local suppliers to meet our supplier due diligence requirements. Where required, we support small/medium-sized suppliers to meet these requirements.</p> <p>In both the DRC and Chad, we have in place a 'know-your-counterparty' (KYC) procedure for service providers and suppliers that seeks to determine whether they comply with applicable laws.</p> <p>In the DRC, where artisanal mining is commonplace, we incorporate in our contracts stringent clauses for compliance with our Supplier Standards, requiring suppliers to notify us of any actual or suspected non-compliance.</p> <p>Our Chad asset includes compliance clauses in its contracts with suppliers. We include the expectations set out in Glencore's Code of Conduct in our manpower agency agreements.</p> <p>In Equatorial Guinea and Cameroon, Glencore has an interest in, but is not the operator, of oil assets. The operators of these assets produce their own standalone modern slavery statements that detail their approach and activities.</p> <p>In Kazakhstan, our Kazzinc precious metals refinery is certified for LBMA Good Delivery Gold bars. Kazzinc complies with Kazak law and is externally audited on its adherence to the LBMA Guidance for Responsible Supply Chains for Gold. Kazzinc's Responsible Supply Chains Practices Policy for Gold and Silver recognises the risks of mining and processing precious metals from conflict-affected and high-risk areas, as well as potential impacts on human rights such as forced, compulsory and child labour. It undertakes training for its employees and contractors involved in precious metals supply chains, on both the LBMA Guidance and its own Responsible Supply Chains Practices Policy.</p>
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**Identifying and assessing risks of modern slavery practices in our business**

continued

Potential exposure to modern slavery	Associated modern slavery risk	Mitigation activities
	<p><b>Lack of local suppliers and absence of labour regulation</b></p> <p>We are committed to local procurement and primarily use local suppliers, to minimise supply chain risk to our operations and support local development, whenever commercial, technical and capability considerations are equal to a regional or international supplier. Local procurement teams manage a majority of procurement for industrial assets. During 2020, around 80% of our global procurement spend was with suppliers local to the countries where we operate. However, in some of our operating regions, there is a lack of strong local businesses that can meet our requirements. In addition, in many countries, labour regulations may be weak or their enforcement inconsistent, which creates risk of non-compliance in those local businesses.</p>	<p>In higher-risk operating regions, our community and procurement teams work together to identify needs and develop support programmes for local businesses, to help them meet our quality standards and our expectations with regard to conduct, including working practices and procurement procedures. As part of this, we offer targeted training on business management skills, underwrite credit applications and guarantee future business within specific limits. We also encourage large international contractors to develop local partnerships to build capacity locally, resulting in employment opportunities and a transfer of skills.</p>



**Identifying and assessing risks of modern slavery practices in our business**

continued

Potential exposure to modern slavery	Associated modern slavery risk	Mitigation activities
<p><b>Workforce</b></p> <p>At the end of 2020, Glencore employed nearly 88,000 employees and over 56,000 contractors.</p>	<p><b>Poor working conditions and underpayment</b></p> <p>In some countries in which we operate, freedom of association, collective representation, collective bargaining and just compensation may not be enshrined in domestic law or may not be effectively protected by local regulatory bodies. In these countries, employees are more likely to be exposed to unsafe working conditions, lack of job security and underpayment.</p> <p>Due to the transitional nature of contractor agreements, contractors can also face higher modern slavery risks. This is particularly the case if they are low-skilled labourers and their work takes them away from home.</p> <p>In 2020, contractors in precarious employment faced heightened risks as a result of the COVID-19 pandemic. This limited some workers' ability to travel home from their workplace, and may have increased pressure on these workers to work in more demanding conditions. Contractors often enter the extractive industry through apparently legitimate routes, yet a lack of transparency can lead to poor working conditions and pay.</p>	<p>Workers directly employed by Glencore are, as set out in more detail below in the section titled 'Strengthening workforce capacity', protected by our policies and procedures which ensure that they are not subject to modern slavery.</p> <p>The companies providing contractor employees to our industrial assets undergo the same supply chain due diligence processes as our other suppliers. As there are relatively few contractors directly employed in our marketing offices, we do not consider modern slavery to be a material risk in this area. We have addressed modern slavery risks in our warehouses and transportation activities in the 'Transportation and distribution' section.</p>
	<p><b>Transportation and distribution</b></p> <p>Our products move through the hands of many service providers, such as warehouses, land freight and shipping lines. Freight, particularly seaborne freight, has been identified in a number of governmental and NGO reports as a sector with a higher risk of modern slavery as it employs lower-paid workers from developing countries, involves long periods at sea with little regulatory oversight, and often subjects crew to difficult working conditions. This risk has been heightened during the COVID-19 pandemic where some workers on vessels have been unable to leave their ships due to various ports not permitting disembarkation.</p>	<p>Our Access World warehouse business is wholly owned and operated by Glencore. Here, our Group policies are in place. Our ongoing management of these facilities includes frequent visits.</p> <p>For non-operated warehouses, we initially undertake inspections and require the provision of information by the warehouse owner/operator.</p> <p>The transportation of our goods tends to be subcontracted to service providers. Our on-boarding process for these companies includes sharing relevant Glencore policies, such as the Supplier Standards and Group Human Rights Policy to support the suppliers' compliance with our requirements.</p> <p>For our own and joint-venture owned fleet, which is chartered to Glencore, we have a direct relationship with the ship-manager and proactively engage on crew welfare and timely relief. During the last year, due to Covid-19 lockdowns, where needed, vessels diverted to a convenient port to facilitate crew change overs.</p> <p>While we do not employ crew directly on our time-chartered vessels, as a part of our supply chain due diligence, we ensure that the all vessels and ship managers are fully compliant with ILO Maritime Labour Convention, 2006. In addition, we check the crew's tenure/time on board at the time of the fixture. If an owner of our chartered vessel requests assistance from us, we provide support where practicable and feasible.</p>





**Identifying and assessing risks of modern slavery practices in our business**

continued

Potential exposure to modern slavery	Associated modern slavery risk	Mitigation activities
	<p><b>Non-controlled joint ventures</b></p> <p>As set out on page 6, Glencore has non-controlling interests in a number of material assets.</p> <p>When we do not directly operate an asset, there is a risk of working practices or procurement procedures not meeting our expectations.</p>	<p>Independent management teams operate our material non-controlled JVs. Along with our JV partners, we participate in board shareholder committees that take key strategic decisions. We use this participation to seek to influence the independent management teams to adopt appropriate operational and governance standards, including those relating to modern slavery, which reflect those of Glencore and the other JV partners.</p> <p>As Glencore provides procurement services to the Hunter Valley Operations (HVO) coal joint venture in Australia under a services agreement, we implement Glencore procurement procedures at that asset. While human rights policies and training for HVO employees are HVO specific, they are consistent with the equivalent policies and training adopted across the Glencore Australian coal assets.</p>



## Addressing risks of modern slavery in our business

The diversity of our geographic locations and production processes, as well as our presence at many stages of the commodity value chain means we take a robust approach to supply chain due diligence as part of our commitment to zero tolerance for modern slavery in our workplaces and supply chains.



Addressing risks of modern slavery in our business

continued

Addressing risks of modern slavery in our supply chains

Given the global span, length and complexity of our supply chains, we recognise that there is the potential for modern slavery risks to exist in our supply chains. To manage and mitigate these risks, we work with relevant stakeholders, such as our workforce, suppliers, contracting companies and business partners, to encourage responsible sourcing.

Supplier Standards

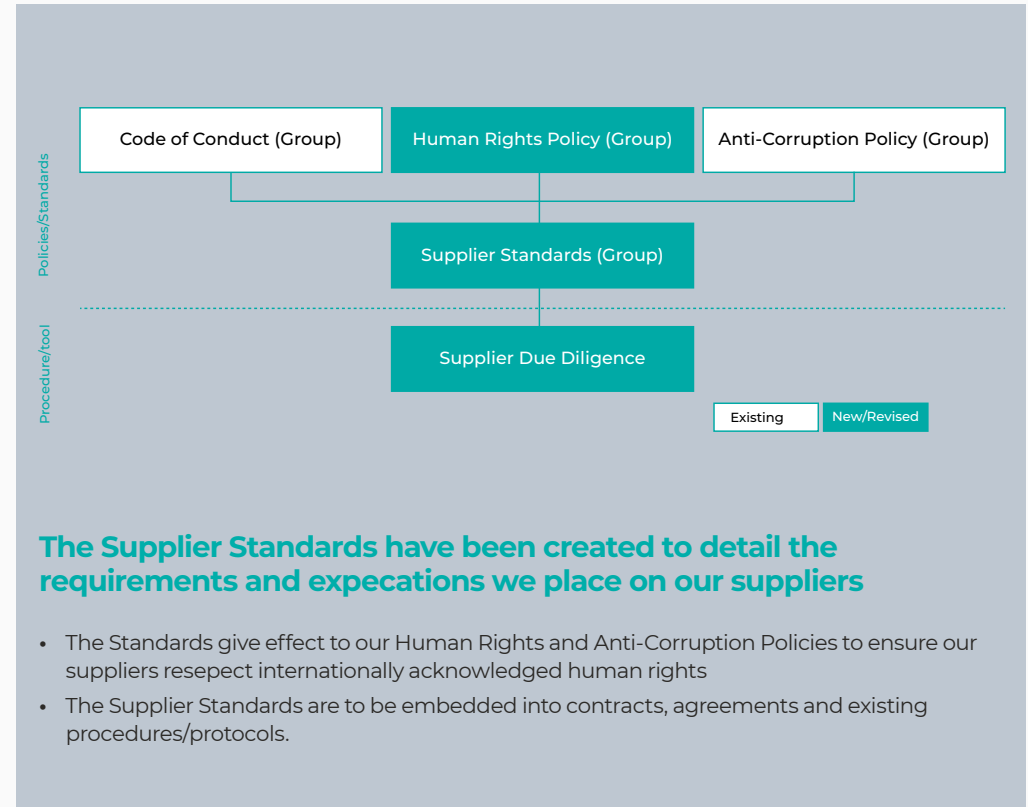
We set out our expectations for ethical business practices, safety and health, human rights and environment in our Supplier Standards, which apply to the suppliers of goods and services across our global business.

The Supplier Standards form the base of our robust risk-based programme, which reflects the values embedded in our Code of Conduct and sets out our expectations of suppliers in relation to ethical, safety, environmental, bribery and corruption and human rights risks in our supply chains.

Our Group Contracting Standard Standard for our marketing business, which aligns with the expectations set out in our Code of Conduct, Anti-

Corruption Policy, Sanctions Policy and Supplier Standards, mandates the use of clauses for certain topics in contracts between our marketing offices and their counterparties. These clauses set out our expectations of our suppliers to comply with all applicable laws, rules and regulations. In addition, our Supplier Standards are incorporated by reference in prospective contracts with our minerals and metals suppliers, which is also a requirement of the Organization of Economic Cooperation and Development's Due Diligence Guidance (OECD DDG) for Responsible Sourcing of minerals from Conflict and High Risk Areas (CAHRAs).

We are at times unable to compel suppliers to accept our Supplier Standards. In these instances, we agree with these suppliers that both parties will agree to comply with an equivalent Code of Conduct or policies. Glencore reviews the supplier's Code of Conduct and/or policies to ensure they materially align with the expectations set out by Glencore's Supplier Standards.



## Addressing risks of modern slavery in our business

continued

In relation to Modern Slavery, our Supplier Standards require that our suppliers:

- Offer fair remuneration to their employees;
- Respect the rights of their workforce to freedom of association and collective bargaining;
- Provide a safe and healthy working environment;
- Respect human rights and the UN Guiding Principles, including by implementing appropriate policies and processes;
- Abide by the ILO Core Labour Standards.

### Supply chain due diligence for our Industrial assets

In developing our supplier risk assessment framework, we prioritised supply chain due diligence in five categories that we identified as posing a higher risk to human rights: (i) security services, (ii) transportation, (iii) facilities management, (iv) textile/garments/ PPE and (v) construction labour. Initially, supplier due diligence was focused on these categories.

Our approach to supplier due diligence seeks to achieve a balance between the country specific risks and the ability of local suppliers to meet our detailed supplier due diligence requirements.

The Australian industrial assets adopted a broader approach that requires all new suppliers, regardless of the product and/or service category they supply, to undertake supply chain due diligence as part of its contracting process. This broader approach was based on the view that Australian suppliers in general, had a greater capacity to satisfy the supplier due diligence requirements. This approach has also been adopted by our South African ferroalloys business, where all new suppliers undergo supply chain due diligence as part of any tender response, and existing suppliers in the five higher risk categories also undergo the supply chain due diligence process.

We identify the risk associated with our suppliers by:

- Conducting a risk assessment during pre-qualification, the tendering process, or at the renewal of an existing contract term;
- Using the results of the risk assessment to determine whether a supplier needs to complete a self-assessment against the Supplier Standards;

- Where the self-assessment identifies issues or unacceptable levels of risk, agreeing with the affected supplier, prior to contracting, appropriate corrective actions and risk mitigation measures;
- Where required, conducting further due diligence, including the use of third party verification. We expect suppliers to cooperate in the additional due diligence and assessment of potential or adverse impacts and provide access to relevant information; and
- Monitoring progress and tracking implementation of performance KPIs. When appropriate, we support our suppliers in capacity building and improving their adherence to the expectations of our Supplier Standards.

Our regional procurement teams reference, and require compliance to, our Supplier Standards in their written supply contracts. We expect our suppliers to review and comply with these Supplier Standards. Where appropriate, we support our suppliers to comply with the Supplier Standards through communication and training, particularly around health and safety at the workplace.

We insert different contract terms relating to our Supplier Standards into our supply contracts depending on whether the counterparty and/ or country of supply are considered low, medium or high risk. For high-risk counterparties or countries of supply, we require the supplier to demonstrate that they (including their subsidiaries and subcontractors) have not breached our supplier standards within the two years prior to contracting with us. We also require the supplier to (i) report to us any non-compliance with our Supplier Standards and (ii) give us the right to monitor and audit this compliance. Most of our African operations have adopted the highest-risk contract terms as standard.

Our South Africa-based ferroalloys business incorporates a supplier standard due diligence questionnaire into its sourcing and tender enquiry templates, as well as in its standard contracts. This allow it to receive responses from existing and potential vendors, which are considered during the tender evaluation process and supports the screening of suppliers' compliance with Glencore's Supplier Standards. In the event of a response raising a red flag, a further investigation and, where appropriate, a vendor audit is conducted prior to contracting. The ferroalloys team investigated a number of systems for developing a database of responses,





## Addressing risks of modern slavery in our business

continued

documents and required actions. It is in the process of implementing a procurement platform, which it will use to manage this process.

In Chad, our contractors and suppliers are subject to standard terms and conditions and Glencore's KYC procedure. The Chad asset has also put in place the following measures to mitigate modern slavery risks:

- Contractors: local contractors' pay is equivalent to the salaries paid to direct employees and there are similar benefits, such as medical, transport, housing and phone and meal allowances. The Labour Direction and National Employment Office (ONAPE) approve all local manpower contracts.
- Security Services: our in-country security manager works with our private security provider to emphasise the importance of their compliance with the International Code of Conduct for Private Security Service Providers. The Code includes a specific reference to the "Prohibition of Slavery and Forced Labour. Signatory companies will not use slavery, forced or compulsory labour, or be complicit in any other entity's use of such labour."

Our in-country security team provides training on the Voluntary Principles for Security and Human Rights to the public security forces, who are under control of local government.

Our Australian industrial assets generally adopt a medium-risk approach to Supplier Standards in contract terms, with each potential new supplier asked to demonstrate the processes and policies they have in place to prevent modern slavery. Here, Glencore's Code of Conduct and relevant Group policies are referenced in supplier contracts and compliance with their expectations is a requirement.

## Supply chain due diligence in our Marketing business

The approach to supply chain due diligence for our metals, minerals and energy products suppliers within our global business aligns with the OECD DDG for Responsible Supply Chains of Minerals from CAHRAs.

The OECD DDG applies to tin, tantalum, tungsten and gold, also referred to as 'conflict minerals'. Today it is largely considered as the most authoritative guidance document for applying due diligence for these minerals' supply chains.

Other metals are covered by other standards and frameworks, for example, the RMI for cobalt, LBMA for silver and gold and the Joint Base Metals Due Diligence Standard for copper, nickel, zinc, lead.

CAHRAs are typically regions or countries with socio-economic and political crises, institutional weakness and weak rule of law, widespread violence including armed conflicts. Such countries are susceptible to widespread human rights abuses - torture, cruel, inhuman and degrading treatment, child, forced or compulsory labour and sexual violence. These human rights abuses are encompassed by the term modern slavery and, together with war crimes or other serious violations of international humanitarian law, represent a significant

supply chain risk. An important part of our due diligence process is to identify whether our third party suppliers of metals and minerals are located in, sourcing from or transporting minerals through CAHRAs and, if so, have the potential to be associated with these human rights abuses. Where we identify a potential 'red-flag' supplier, they undergo further risk assessments.

Glencore's CAHRA list reflects inputs taken from findings made by governments, international organisations, including the United Nations and its Security Council sanctions, think-tanks, NGOs, industry literature relating to mineral extraction, media, as well as internationally recognised indices on conflict, democracy and rule of law, and human rights. We tested the validity of our CAHRA determination with recognised industry consultants and considered the indicative and non-exhaustive CAHRA list produced by the European Union.



## Addressing risks of modern slavery in our business

continued

### Implementing the OECD five-step approach to due diligence

Due diligence: an on-going, proactive and reactive process to identify and address actual or potential risks in order to prevent or mitigate adverse human rights impacts in our supply chain

#### Step 1

Establish strong company management systems

#### Step 2

Identify and assess risk in supply chain

#### Step 3

Design and implement a strategy to respond to identified risk

#### Step 4

Carry out independent audits

#### Step 5

Report annually on supply chain due diligence

By applying the OECD's five-step due diligence approach to our due diligence for our minerals and metals supply chains, we rely on a comprehensive and robust methodology to identify, assess and manage supply chain risks. In conducting our due diligence process, we work collaboratively with our suppliers. To date, reflecting our risk-based approach, we have implemented our due diligence approach to our supply chains for cobalt, nickel, zinc and copper, and are in the process of rolling it out to our remaining commodities.

We seek to confirm that our metals and minerals suppliers operate in accordance with our Supplier Standards, including that they are not knowingly tolerating, contributing to or profiting from any of the OECD DDG ANNEX II risks, which includes modern slavery. If a high level of risk is identified, we work with the supplier to determine appropriate corrective action until both parties agree the desired outcome has been achieved.

One of our largest challenges is that for a company of our size, robust due diligence requires significant resources and time, not only for our due diligence team, but also for our suppliers. While due diligence is a well-established process for 'conflict minerals', it is less established for base metals. If one supply chain participant is less responsive, this has an impact on the overall due diligence efforts, which can affect transparency and undermine the potential to identify and address human rights issues in the entire supply chain. We believe that a key success factor is to establish an agreed due diligence standard by all supply chain participants. As such, we welcome the London Metal Exchange's (LME) recently introduced responsible sourcing requirements and see these as a catalyst to drive responsible sourcing efforts in the supply chains of the metals that we market as LME listed brands.



## Addressing risks of modern slavery in our business

continued

### Piloting the RMI's audit programme

In 2019 and 2020, we worked with the Responsible Minerals Initiative (RMI) to pilot its Responsible Minerals Assurance Process (RMAP) for cobalt at our Murrin Murrin asset in Australia. The RMAP uses independent third-party assessments of smelter and refinery management systems and sourcing practices to validate conformance with its cobalt standard. The RMAP standards are developed to meet the requirements of the OECD DDG, the Regulation (EU) 2017/821 of the European Parliament and the US Dodd-Frank Wall Street Reform and Consumer Protection Act.

In 2020, RMI announced the conclusions of the pilot

assessment at Murrin Murrin, which found that the due diligence management system conforms, in all material aspects, to the requirements of the RMAP cobalt standard.

In February 2021, our KCC asset in the DRC undertook an assessment, as part of RMI's pilot audit programme for crude cobalt refiners. The audit considered the flow of material and controls (metals accounting); ensuring no external material enter KCC's processes; and security and human rights, including KCC's approach to artisanal and small-scale mining, labour related human rights (such as modern slavery) and health and safety. KCC was confirmed as conformant with all the requirements of the standard in April 2021.

We have published both Murrin Murrin's Responsible Minerals Assurance Process (RMAP) due diligence report and KCC's RMAP due diligence report on our website.

The successful RMI assessment of Murrin Murrin complements our refiners, who are on the LBMA Good Delivery List. In 2020, as in previous years, our refiners maintained their successful LBMA responsible gold and silver metal accreditations.



## Addressing modern slavery risk in our operations - strengthening workforce capacity

We uphold the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

We recognise and uphold the rights of our workforce to a safe workplace, freedom of association, collective representation, collective bargaining, job security and development opportunities. These rights are set out in our Group Human Rights Policy, which applies to all employees, directors and officers, as well as contractors under Glencore's day-to-day operational direction, working at a Glencore marketing office or industrial asset.

To prevent modern slavery in our workplaces we ensure our workers are paid in accordance with legal requirements, have contracts of employment and have the ability to leave their employment at any time, subject to notice periods. We also provide our employees and contractors with regular training and access to a formal complaints process. In addition, we work hard to maintain robust relationships with local union representatives.





## Addressing modern slavery risk in our operations - strengthening workforce capacity

continued

### Governance

In 2020, we embarked on a comprehensive review of our entire Group policy framework. This was a collaborative, cross-functional project to develop and implement a more streamlined and consistent approach to policy governance at Glencore.

In addition to re-evaluating our policy framework, we reviewed and refreshed all of our Group policies. The aim was to ensure Glencore's commitments, approaches and requirements are accessible to employees and relevant contractors in a simple, clear and concise fashion. Employees must be able to easily understand the behaviours expected of them. External stakeholders must also have access to our policies to stay informed of Glencore's approaches and commitments on matters of critical importance to them.

The Group policy framework, and supporting policies, standards, procedures, guidelines and operational processes embed our commitment across our business to respect human rights and align with the Guiding Principles and with the Sustainable Development Framework of the ICMM.

Employees and relevant contractors at our office and industrial assets are expected to apply Glencore's Group policy framework while also focusing on local challenges and opportunities through tailored approaches and action plans. Integrated management is critical for this approach. We track our progress on implementing our policy framework through our internal assurance processes. In addition, we consider the complaints raised through both our Raising Concerns platform (see below) and our grievance mechanisms utilised by stakeholders living close to our operations.

Our workforce can access our policy framework through various channels, including the Group and local intranets. Our Group policies are available in 12 languages.

Our managers and supervisors are responsible for ensuring employees understand and comply with the policies, standards and procedures. As part of our group-wide roll out of our new policy framework, we will conduct targeted training sessions for our managers and workforce.

We require each of our assets to undertake an annual self-assessment on their implementation of our Group HSEC-HR expectations. These self-assessments are reviewed by both the corporate HSEC-HR team and the internal audit function.

The key Group policies relating to human rights, including modern slavery, are the following:

- Code of Conduct
- Human Rights Policy
- Anti-Corruption Policy
- Equality of Opportunity Policy
- Diversity and Inclusion Policy
- Community and Stakeholder Engagement Policy
- Health and Safety Policy
- Environmental Policy
- Supplier Standards

In particular, our Group Human Rights Policy sets out our commitment to respect the dignity and human rights of our workforce and our business partners, the 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, as well as utilising our Supplier Standards and supply chain due diligence process to encourage their alignment with our expectations.

The Glencore Board, through its Health, Safety, Environment and Communities (HSEC) Committee oversees our human rights activities which are embedded across the business. It reviews the

executive summaries generated by our assurance of the technical and management standards that support the Group policy commitments.

Our HSEC assurance processes (which include an assessment of modern slavery risks) support Glencore's management's assessment of risk and provides assurance on key mitigation controls. It has three elements:

1. General risk management: throughout the Group, we use our risk management framework to identify hazards, particularly those with potentially major or catastrophic consequences, and to develop management plans for the related risks.
2. Self-assessments: our assets complete annual self-assessments against Group sustainability policies, standards and fatal hazard protocols. We use the results to drive performance and to identify gaps. As part of our annual sustainability data audit, our external auditor checks the work at a number of assets for data accuracy and policy compliance.
3. HSEC-HR auditing: our HSEC Assurance Policy specifies HSEC-HR auditing activities at both Group and departmental levels with a focus on catastrophic hazards.



## Addressing modern slavery risk in our operations - strengthening workforce capacity

continued

We respect our workforce's right to freedom of association and the right to collective bargaining and we foster transparent and collaborative labour relations. We promote fair recruitment and employment practices so that all work is voluntary and fairly compensated (as provided in the Group Human Rights policy).

### Training

We conduct training with our employees and relevant contractors to ensure they understand the behaviour expected of them and provide guidance on the elements of the Group's policy framework. Our training programmes mix e-learning with face-to-face training. We tailor our training and awareness materials and make them relevant by including hypothetical scenarios illustrating how human rights dilemmas might manifest themselves in employees' daily work. Our annual training on the Code of Conduct for employees includes a specific module on human rights applicable to our suppliers and contractors.

New joiners receive compliance training sessions on our Values, Code of Conduct, and key compliance risks including how to raise concerns. Where regular

access to a work computer is not available, employees and contractors receive training in other ways, including induction sessions, pre-shift training and toolbox talks.

In addition to online and face-to-face training, awareness-raising activities and initiatives are key to reminding employees of the importance of ethics and compliance. While in-person activities and initiatives have been heavily impacted by Covid-19, we have continued to develop awareness materials in the form of electronic guides, checklists, newsletters, videos and intranet communications.

Participants from our marketing teams receive training to support their understanding of due diligence in minerals supply chains, the adverse human rights impact associated with sourcing, handling, processing, transporting of minerals through CAHRAs, the elements of the OECD's five-step approach due diligence, as well as their roles and responsibilities for implementation for a robust due diligence.

### Industrial relations

We are committed to working honestly and openly with labour unions at all our locations and treating employees with respect. As unions play different roles at our assets depending on geographical region and industrial sector, our assets

engage with unions active at their sites in different ways and at different levels. We do not interfere with the rights of unions and prohibit any form of intimidation or retaliation against workers seeking to exercise their rights to freedom of association, collective representation and/or collective bargaining.

Our assets ensure that working hours are not excessive by monitoring rosters, shifts and other recording procedures, in compliance with local legislation and agreements with unions or works councils.

Our assets hold regular meetings with union representatives to provide updates on safety, production and costs and discuss upcoming business challenges, opportunities, and risks to longer-term viability.

### Making a complaint

We have clear, formal processes for our people to report labour grievances.

### Raising Concerns programme

Glencore is committed to creating a culture where our workforce and other stakeholders, such as customers and suppliers, feel comfortable reporting concerns without fear of retaliation. We are also committed to ensuring concerns are treated seriously and handled and/or investigated in a manner that protects a whistleblower's identity. Identification of concerns allows us to take appropriate action that could

prevent further misconduct and limit potential financial, reputational and other impacts. Our Whistleblowing Policy sets out Glencore's approach to protecting whistle-blowers with the aim of encouraging and supporting individuals to report concerns. It also provides detail on the process for reporting, escalating, handling and/or investigating and remedying concerns.

Glencore is committed to:

- Protecting whistleblowers and other individuals from retaliation;
- Protecting the identity of whistleblowers and respecting their confidentiality;
- Giving whistleblowers the opportunity to report anonymously; and
- Taking protected concerns seriously and handling and/or investigating protected concerns in a diligent and efficient manner.

We encourage whistleblowers to first raise concerns with relevant managers or supervisors as they are usually best equipped to resolve concerns quickly and effectively. Reporters also have the option of reaching out to nominated whistleblowing contacts, who are members of senior management at the office or industrial asset.

If a concern remains unresolved or a whistleblower is uncomfortable using



## Addressing modern slavery risk in our operations - strengthening workforce capacity

continued

local channels, concerns can also be reported via our Raising Concerns Programme. This is our corporate whistleblowing programme and is managed centrally at our Head Office in Switzerland.

Raising Concerns allows whistleblowers to raise concerns anonymously in any of 21 languages, by internet or phone. Hotlines are available in most of the countries where we operate, and details are published on the platform's website and on posters at offices and industrial assets. All concerns are taken seriously and handled promptly and objectively. We investigate all reports made in good faith.

During 2020, our Raising Concerns platform received 413 reports of concerns (2019: 500), with the following breakdown:

- Business Integrity – 143 (35%);
- Human rights – 190 (46%);
- HSEC-HR – 57 (14%); and
- Others – 23 (5%).

None of the human rights Raising Concerns reports were related to modern slavery.

## Complaints and grievances on human rights impacts

We consider access to remedies to be a core aspect of our management of human rights. We operate grievance mechanisms at all our assets for our stakeholders that are legitimate, accessible, predictable, equitable, transparent and rights-compatible and in line with the United Nations' Guiding Principles' effectiveness criteria. Our Group Human Rights Policy requires assets that cause or contribute to an adverse human rights impact to provide or participate in effective remediation. Our approach aligns with our commitment to the UN Guiding principles.

These mechanisms provide an accessible channel for directly affected stakeholders to communicate their human rights concerns without fear of reprisals. These platforms enable our assets to identify, acknowledge and address genuine operational-related grievances and complaints in a timely and effective manner. We commit to investigating all concerns in a manner that respects the rights of the complainant. We require our local management teams to review the complaints and grievances received, as well as to consider their trends over time. We encourage our assets to conduct regular community perception surveys, which include questions on their grievance mechanisms.

In 2020, we received 1,272 community complaints (2019: 1,149 complaints). The majority, 34%, related to damage caused by flood water runoff from the Badila and Mangara operations in Chad, which were addressed by the asset's stakeholder relations team. Other complaints from around the Group related to odour/fumes and noise, which accounted for 17% and 14% of our total complaints, respectively.

We encourage our suppliers to ensure their workforce and associated communities have access to grievance mechanisms to raise concerns confidentially without fear of retaliation.

We did not receive any modern slavery complaints during the reporting period through our operational grievance mechanisms.



# Effectiveness

Glencore is committed to continuously assessing its modern slavery risks and improving its framework for addressing them.

We track our progress on supply chain due diligence. During 2020, our industrial assets screened 7,599 new suppliers following a risk-based approach (2019: 10,432), of which 3,993 suppliers were screened on social criteria which incorporates modern slavery considerations (2019: 5,680).





**Effectiveness**

continued

**Effectiveness of our 'know-your-counterparty' (KYC) screening**

In 2019, our African copper assets in the DRC and Zambia adopted a new vendor management procedure which covers both the KYC process for industrial assets, and the Supplier Standards as well as the Group's supply chain due diligence approach. To date, we have completed around 470 new KYC and supplier due diligence assessments for these assets.

We work with our suppliers to improve their practices where they do not meet our standards. For example, the Norwegian Government Pension Fund Global recommended divesting from a global company contracted to one of our sites in a country we have identified as having a potentially high risk of modern slavery, due to "an unacceptable risk that the company is contributing to systematic human rights violations" against workers in Qatar and the UAE. We engaged with the company to understand the actions they had taken to address the allegations and the policies and procedures they had put in place to mitigate future risks. We also amended our contract to strengthen the clauses relating to our supplier standards expectations, the requirements for

appropriate policies and procedures to be in place and the need to notify of any breaches of the agreement.

In 2019, we implemented our new supply chain due diligence approach in Australia and New Caledonia. Since then, our procurement teams have completed 3,315 KYC and supply chain due diligence assessments, with 85% undertaken in Australia.

The assessment process approved just over 2,000 applications and rejected three suppliers. Of the three suppliers rejected, we found all to be conducting poor business practices such as theft. For around 500 applications no further assessment was required. The remaining 800 applications require further review to ensure the process is complete.

Our pre-tender supplier assessment found an Australian-based labour supply company that paid workers a wage based on the group rather than individual productivity, contrary to Australian work place law. The company was subject to an enforceable undertaking from the Australian government's Fair Work Australia agency to pay workers based on their individual productivity. While our assessment process identified this issue and our subsequent review found that the company had addressed the issue, we ultimately chose not to use

this company due to the proliferation of labour supply companies in the market place.

**Tracking complaints and grievances**

Our corporate team reviews the type and frequency of complaints made via our asset operated grievance mechanisms and our corporate-led Raising Concerns platform. When appropriate, further action is taken to address reoccurring, high frequency or serious complaints.

In 2020, we undertook a review of the local grievance mechanisms against the United Nations Guiding Principles' (UNGP) criteria. We identified areas for improvement, including the need for more robust mechanisms to measure the effectiveness of the process and the need to include feedback from potentially-affected stakeholders. Over the next year, our assets will strengthen the design of their complaints and grievance processes.

We followed this assessment with learning webinars in early 2021 focused on challenges and good practices in complaints and grievance process implementation. Participants included representatives from our compliance, legal and community teams. The webinars were run in our key operating regions and held in various languages.

**Implementing our human rights risk assessment tool**

In 2020, we developed an innovative human rights rating tool to enable consistent assessment of the human rights risk level of each asset across the Group. We developed the tool in consultation with internal and external human rights experts who helped identify country and local risk indicators for each of the Group's salient risks (labour rights, safety, health, security, inequality and water). The tool comprises 20 indicators from credible, international sources and 29 internal indicators from across our assets.

An asset's risk rating will determine the minimum actions required to manage human rights risks. We are rolling out the tool out during 2021 and will report on its findings both internally to the HSEC Board Committee and externally in our annual Sustainability Report.

**External engagement**

During the year, we continued to engage with our internal and external stakeholders to drive the development of and alignment with practical, performance-driven responsible sourcing initiatives, standards and frameworks.



**Effectiveness**

continued

**Working with the Cobalt Institute**

We work closely with the Cobalt Institute, chairing the Sustainability and Responsible Sourcing Working Group. We are continuing to work with the Cobalt Institute on its Cobalt Industry Responsible Assessment Framework (CIRAF). This framework strengthens the ability of cobalt producers and buyers to assess, mitigate and report on responsible production and sourcing risks in their operations and supply chains. The CIRAF also enables a more coherent and consistent approach to cobalt due diligence and reporting by the cobalt industry.

**Engaging with our peers**

We have strong relationships with a number of industry organisations, including the International Copper Association, RMI, LME, Eurometaux, ICMM and various industry associations of which we are members. Our participation in these organisations allow us to engage with our peers and downstream users of our products, as well as providing an opportunity to contribute to the development of industry standards.

During the year, we engaged on our approach for responsible production and sourcing, as well as its challenges and opportunities, at several multi-stakeholder forums. These included participating in the RMI's annual conference as a panellist to discuss progressive improvements of refiners in cobalt supply chains.

Throughout the year, we continued to participate in the ICMM's Responsible Sourcing Working Group. This is an opportunity to engage with peers and to identify opportunities for a coordinated approach in demonstrating responsible supply chains.

**Working with the Fair Cobalt Alliance**

During the year, we reviewed our overall approach to ASM in recognition of the important and sustainable role that responsible and transparent ASM could have in supply chains. We became a member of the Fair Cobalt Alliance (FCA), collaborating with other supply chain companies and non-industry stakeholders. The FCA's mission is to transform ASM in the DRC in a positive manner through eliminating child and forced labour, supporting the professionalisation of ASM through the adoption of responsible mining practices, and identifying and supporting alternative livelihoods to help increase incomes and reduce poverty.

One of the FCA's foundational projects is the development of a globally accepted 'ASM Framework'. The Framework, aligns with existing relevant standards in the DRC and

is intended to reflect the responsible ASM expectations of both global supply chain actors and DRC stakeholders. The Framework is progressive, designed to be accessible to ASM operators and to foster improvements over time. Protecting human rights, ending dangerous working conditions and raising productivity are key aspects of the Framework, supported by basic, progressive and advanced criteria. To this end, the Framework includes measures on child labour, forced labour, remuneration, working hours, discrimination, and access to personal protection equipment.

FCA is developing the Framework in collaboration with the Responsible Cobalt Initiative and the Global Battery Alliance's Cobalt Action Partnership (CAP). During 2021, the CAP is carrying out a substantial public consultation process in the DRC and with international stakeholders.



## Consultation

In preparing this statement, we consulted widely with stakeholders across our procurement, legal, compliance and operations teams in a number of regions.

Our Board Health Safety, Environment and Communities (HSEC) Committee, which includes our Chief Executive Officer and Chairman as members, sets the strategic direction for our global sustainability activities, including our approach towards human rights and modern slavery, and oversees the development and implementation of our strategic health safety, environment and communities and human rights (HSEC-HR) programmes.

The HSEC Committee regularly evaluates the effectiveness of our systems for identifying and managing HSEC-HR related risks, and considers overall performance. The HSEC Committee receives regular updates on the performance of our global assets in the area of human rights (which includes modern slavery concerns), including being made aware of complaints.

As part of our supply chain due diligence process, our regional teams include modern slavery in their discussions on broader human rights issues through various mechanisms including regular compliance updates.





## Next steps

We will continue to work with both our internal and external stakeholders to address the risks associated with modern slavery within our business. Going forward we will:

- Supply chain due diligence: reflecting our risk-based approach, we have implemented our due diligence approach to our metals and minerals supply chains for cobalt, nickel, zinc and copper, as well as in our coal business. We will roll it out to our remaining commodities over the coming year;
- Grievance mechanisms: we are committed to creating a culture where everyone feels free to speak about concerns in a secure and confidential way. In 2021, we will build on the findings of assessment of our local complaints and grievance processes against the UNGP effectiveness criteria. These included the need for more robust mechanisms to measure the effectiveness of the process, including feedback from potentially affected stakeholders;
- Internal awareness and training: we conduct training with our employees and relevant contractors to ensure they understand the behaviour expected of them and provide guidance on the elements of our policy framework. In 2021, we will look to strengthen understanding of modern slavery through providing training for both our industrial and marketing teams; and
- Regulatory developments: we track regulatory developments, working to harmonise our approach to regulatory compliance and to incorporate modern slavery into our broader responsible sourcing programme. Where these have the potential to affect our business we look for opportunities to engage in consultation processes. Once finalised, we map our existing approach to the new regulation and address any identified gaps. During 2021, a key focus will be implementing the recently published LME responsible sourcing requirements.





## Board approval

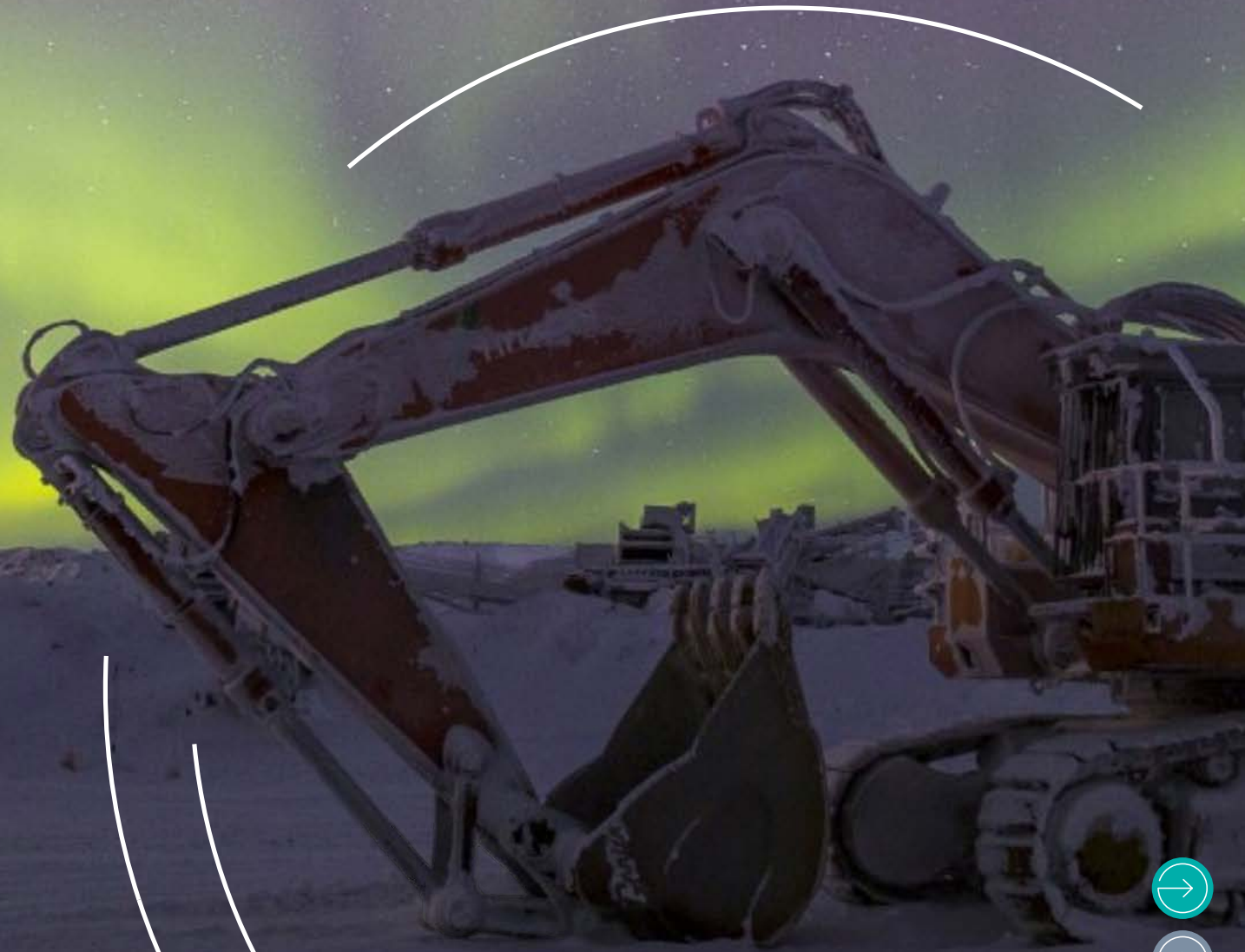
This Statement has been approved by the Board of Glencore plc and is signed on its behalf by Tony Hayward, Chairman of the Board, on behalf of all Glencore Group reporting entities under the UK and Australian Acts.

**Tony Hayward**

Chairman  
29 June 2021



# Additional Information



## Australian entities

The Australian entities covered by this report, as required under the Australian Modern Slavery Act

Company	Commodity
Glencore Holdings Pty Limited	-
Glencore Investment Pty Limited	-
Glencore Queensland Limited	-
Helios Hawk Pty Ltd	-
Midas Hawk Pty Ltd	-
Glencore Operations Australia Pty Limited	-
Copper Refineries Pty Ltd	Copper
Ernest Henry Mining Pty Ltd	Copper
Mount Isa Mines Limited	Copper/ Zinc
McArthur River Mining Pty Ltd	Zinc

Company	Commodity
Noranda Pacific No. 2 Pty Limited	Zinc
Noranda Pacific Pty Limited	Zinc
Cadelan Pty Limited	Copper
Acelight Pty Limited	Copper
Glideco Pty Limited	Copper
Isokind Pty Limited	Copper
Minara Resources Pty Ltd	Nickel
Glenmurrin Pty Limited	Nickel
Glencore Australia Oil Pty Limited	Oil
Rolleston Coal Holdings Pty Limited	Coal
Helios Australia Pty Limited	Coal
Cumnock Coal Pty Limited	Coal
Cumnock No. 1 Colliery Pty Limited	Coal
Mangoola Coal Operations Pty Limited	Coal
Enex Foydell Pty Limited	Coal
Enex Liddell Pty Limited	Coal
Gabume Pty Limited	Coal

Company	Commodity
Anotero Pty Limited	Coal
HVO Coal Sales Pty Ltd	Coal
HV Coking Coal Pty Limited	Coal
Mt Owen Pty Limited	Coal
NC Coal Company Pty Limited	Coal
Oaky Creek Holdings Pty Limited	Coal
Nicias Investments Pty Ltd	Coal
GS Coal Holdings Pty Ltd	Coal
GS Coal Pty Ltd	Coal
AZSA Holdings Pty Limited	Coal
Glencore Coal Holdings Pty Limited	Coal
Glencore Coal Investments Australia Pty Limited	Coal
Glencore Coal Pty Limited	Coal
Jonsha Pty Limited	Coal
Enex Ulan Pty Limited	Coal
Oakbridge Pty Limited	Coal
The Newcastle Wallsend Coal Co Pty Ltd	Coal

Company	Commodity
Saxonvale Coal Pty Limited	Coal
Enex Oakbridge Pty Limited	Coal
Glencore Coal (NSW) Pty Limited	Coal
Glencore Coal Sales (NSW) Pty Limited	Coal
Hail Creek Coal Holdings Pty Limited	Coal



## IMPORTANT NOTICE CONCERNING THIS REPORT INCLUDING FORWARD LOOKING STATEMENTS

This document contains statements that are, or may be deemed to be, “forward looking statements” which are prospective in nature. These forward looking statements may be identified by the use of forward looking terminology, or the negative thereof such as “outlook”, “plans”, “expects” or “does not expect”, “is expected”, “continues”, “assumes”, “is subject to”, “budget”, “scheduled”, “estimates”, “aims”, “forecasts”, “risks”, “intends”, “positioned”, “predicts”, “anticipates” or “does not anticipate”, or “believes”, or variations of such words or comparable terminology and phrases or statements that certain actions, events or results “may”, “could”, “should”, “shall”, “would”, “might” or “will” be taken, occur or be achieved. Forward-looking statements are not based on historical facts, but rather on current predictions, expectations, beliefs, opinions, plans, objectives, goals, intentions and projections about future events, results of operations, prospects, financial condition and discussions of strategy.

By their nature, forward-looking statements involve known and unknown risks and uncertainties, many of which are beyond Glencore’s control. Forward looking statements are not guarantees of future performance and may and often do differ materially from actual results. Important factors that could cause these uncertainties include, but are not limited to, those disclosed in the Risk Management section of this report.

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

Neither Glencore nor any of its associates or directors, officers or advisers, provides any representation, assurance or guarantee that the occurrence of the events expressed or implied in any forward-looking statements in this document will actually occur. You are

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No statement in this document is intended as a profit forecast or a profit estimate and past performance cannot be relied on as a guide to future performance. This document does not constitute or form part of any offer or invitation to sell or issue, or any solicitation of any offer to purchase or subscribe for any securities.

The companies in which Glencore plc directly and indirectly has an interest are separate and distinct legal entities. In this document, “Glencore”, “Glencore group” and “Group” are used for convenience only where references are made to Glencore plc and its subsidiaries in general. These collective expressions

are used for ease of reference only and do not imply any other relationship between the companies. Likewise, the words “we”, “us” and “our” are also used to refer collectively to members of the Group or to those who work for them. These expressions are also used where no useful purpose is served by identifying the particular company or companies.

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## Our Purpose

Responsibly sourcing the commodities that advance everyday life

## Our strategic objective

To be a leader in enabling decarbonisation of energy usage and help meet continued demand for the metals needed in everyday life while responsibly meeting the energy needs of today

## Our values

Our Values reflect our purpose, our priorities and the beliefs by which we seek to conduct ourselves and carry out our business activities. They define what it means to work at Glencore, regardless of location or role.



### Safety

We never compromise on safety. We look out for one another and stop work if it's not safe.



### Integrity

We have the courage to do what's right, even when it's hard. We do what we say and treat each other fairly and with respect.



### Responsibility

We take responsibility for our actions. We talk and listen to others to understand what they expect from us.



### Openness

We're honest and straightforward when we communicate. We push ourselves to improve by sharing information and encouraging dialogue and feedback.



### Simplicity

We work efficiently and focus on what's important. We avoid unnecessary complexity and look for simple, pragmatic solutions.



### Entrepreneurialism

We encourage new ideas and quickly adapt to change. We're always looking for new opportunities to create value and find better and safer ways of working.

In addition to this our annual Modern Slavery Statement, our annual corporate reporting suite reflects our commitment to transparent disclosure across a broad range of topics:

- Annual Report 2020
- Sustainability Report 2020
- Sustainability Highlights 2020
- Payments to Governments Report 2020

## Disclaimer

The companies in which Glencore plc directly and indirectly has an interest are separate and distinct legal entities. In this document, "Glencore", "Glencore group" and "Group" are used for convenience only where references are made to Glencore plc and its subsidiaries in general. These collective expressions are used for ease of reference only and do not imply any other relationship between the companies. Likewise, the words "we", "us" and "our" are also used to refer collectively to members of the Group or to those who work for them. These expressions are also used where no useful purpose is served by identifying the particular company or companies.

[www.glencore.com/sustainability/stakeholder-engagement](http://www.glencore.com/sustainability/stakeholder-engagement)

## Find us on:

