



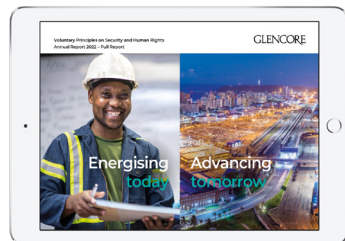
Energising  
today



Advancing  
tomorrow



# Committed to respecting human rights.



## Quick link



Our sustainability communications are available on our website:

[glencore.com/publications](https://www.glencore.com/publications)

## Find out more

How we are implementing the VPs in the DRC, see page 7

## Introduction

We recognise that our industrial assets have the greatest potential to impact the security and human rights of both our workforce and neighbouring communities.

Glencore is one of the world's largest global diversified natural resource companies and a major producer and marketer of more than 60 commodities. Our industrial business spans the metals and energy markets, producing multiple commodities. Our marketing business moves commodities from where they are plentiful to where they are needed. We have a strong footprint of industrial assets and offices in over 35 countries.

In March 2015, Glencore became a member of the Initiative of the Voluntary Principles on Security and Human Rights (VPs). We support, implement and promote the VPs. We train our security employees and private security contractors on the VPs and are clear about our expectations when engaging with public security.

This report covers the actions Glencore has taken to implement the VPs during 2022 and details our implementation of the VPs at our industrial assets. It excludes our activities at our marketing offices.

<b>Introduction</b>	
<b>Commitment to the Voluntary Principles</b>	
Public Statement of commitment	2
Engagement in the Voluntary Principles Initiative (VPI)	3
Transparency	3
<b>Policies, procedures and related activities</b>	
Assessing security impact, risks, and opportunities	4
Working with private security providers	4
Working with public security providers	5
Security-related incidents	5
<b>Country implementation</b>	
Addressing threats to human rights defenders in Colombia	6
Implementing the VPs in the DRC	6
<b>Additional information</b>	
Glossary	8
Important notice	9
Contact us	11
About Glencore	11

## Commitment to the Voluntary Principles

### Public Statement of commitment

#### Senior management oversight

Our Board Health, Safety, Environment and Communities (HSEC) Committee sets the strategic direction for our sustainability activities and oversees the development and implementation of our strategic health, safety, environment, social performance, and human rights programmes.

Its members are Peter Coates (Committee Chair), Cynthia Carroll, Patrice Merrin, and Kalidas Madhavpeddi (Group Chairman). All four members are non-executive directors with extensive operational experience. Their knowledge and understanding, acquired over a number of years in operational roles, equips them to oversee the embedding of human rights and HSEC principles, including those relevant to the implementation of the VPs, into our corporate culture, policy, and strategy.

Our CEO and Chairman reference our membership of the VPs, when appropriate, in their engagement activities with both our external stakeholders and our workforce.

#### Commitment to respecting human rights

We respect the dignity and human rights of our workforce and our business partners, the communities in which we live and work, and others who may be affected by our activities. We are committed to respecting human rights in line with the UN Universal Declaration of Human Rights, International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the ILO Forced Labour Protocol, the UN Guiding Principles and the UN Global Compact. We are also aligned with the ICMM

Mining Principles (ICMM) and UN Sustainable Development Goals (SDGs).

We seek to avoid causing or contributing to adverse human rights impacts; preventing or mitigating adverse human rights impacts; and we seek to make a positive contribution to the advancement of human rights of all people, including vulnerable groups. In the event we directly or indirectly cause or contribute to an adverse impact on human rights, we provide for, or cooperate in, processes to enable appropriate remedy and/or a corrective action plan.

Our approach is based on increasing awareness of human rights, building capacity and promoting stakeholder dialogue. We aim to build strong and trusting relationships in the societies where we operate and pay special attention to the rights of vulnerable groups that may be impacted by our operations.

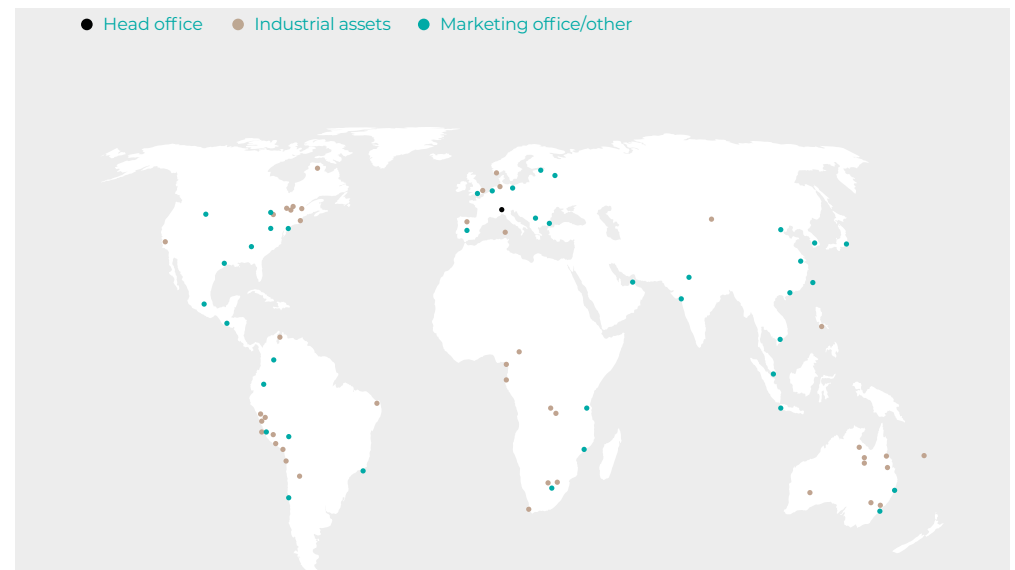
In July 2022, we hosted a three-day internal human rights workshop attended by our human rights, security, social performance and sustainability practitioners from across our industrial assets. Opened by our CEO and facilitated by external subject matter experts, the workshop addressed a range of human rights and security topics with keynote speakers including a representative of DCAF (the Geneva Centre for Security Sector Governance) who spoke about emerging issues in security sector governance.

The workshop was an opportunity for participants to share knowledge and build their understanding of Glencore's salient human rights issues as well as the practical application of cross-functional human rights risk assessments. One outcome of the July human rights workshop was a commitment to host a series of security and VPs specific workshops, which will be held during 2023.

We require our industrial assets to 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.

During 2022, we reviewed and updated our Incident Management Procedure which includes Social Performance and Human Rights Incidents Classifications. This Procedure sets out the process for capturing, recording and reporting security incidents. We require our industrial assets to classify, notify and report actual or potential social performance or human rights incidents in accordance with the Procedure's requirements. We undertake investigations to identify direct and/or contributing factors to prevent repeat occurrences.

#### Our global presence:



As part of the rollout of the revised Procedure, we held a series of global workshops attended by representatives of our Health and Safety, Environmental and Social Performance, Human Rights and Legal functions.

We are committed to working alongside neighbouring communities and strategic stakeholders to protect the safety and security of our workforce and the communities that interact with our industrial assets. We do this in a manner that respects human rights and aligns with our Values and commitment to operating responsibly and ethically.

While some of our operating jurisdictions have a higher potential risk of security-related human rights breaches, we expect our people to avoid complicity and uphold international standards at all our industrial assets.

## Commitment to the Voluntary Principles *continued*

### Engagement in the Voluntary Principles Initiative (VPI)

During 2022, we engaged with the Swiss government on the VPs, including on the application of the government of the Democratic Republic of the Congo (DRC) to become a member of the VPI.

In May 2022, we participated in the annual VPI Plenary in Toronto, which provided knowledge building and networking opportunities.

Our local teams have participated in the in-country working groups active in the DRC and Peru (both in Lima and Cusco).

In the DRC, the working group is led by DCAF. In 2022 it raised awareness of the VPs among extractive companies present in the DRC. Glencore also participated in a multi-stakeholder advisory group that supported the DRC's application to join the VPI.

In Peru, the National Society of Mining, Petroleum, and Energy initiated a working group on the VPs. This working group has conducted training and shared case studies contributed by members. Our industrial asset Antapaccay has participated in all meetings organised by this working group.

In December 2022, we joined the VPI SteerCo in Geneva as part of the corporate pillar team.

We continued to take part in the corporate pillar calls, which enabled us to input into the activities of the VPI.

We are committed to providing timely responses to reasonable requests for information from other participants of the VPI to facilitate greater understanding of the issues related to the implementation of the VPs. We participate in national and regional VPs working groups where they exist in our operating jurisdictions.

Our participation in the annual Plenary, the corporate pillar and in-country working groups, as well as this report, are aligned with the requirements set out in the VPI's Governance Rules.

A representative of DCAF was a guest speaker at our Human Rights workshop, see page 2, addressing the topic of "Emerging issues in security sector governance."

In early 2023, we became an observer of the International Code of Conduct Association – ICoCA.

### Transparency

We report on our membership of the VPI and implementation of the VPs in our Annual and Sustainability Reports. We make our annual VPs report publicly available on our website at [Glencore.com/publications](https://www.glencore.com/publications).

We are a member of the ICMM. We align our policies with its Sustainable Development Framework, which includes a commitment to uphold human rights and to address risks relating to security-related human rights breaches.

Awareness and embedding of the VPs in our operating procedures occurs on a continuous basis. In 2022, we hosted a three-day human rights and security workshop attended by representatives from across our industrial assets, see page 2. We appointed a Corporate Security Advisor to supplement and support existing operational and department security specialists and reinforce the operationalisation of the VPs across our industrial assets.

In 2022, we launched our Responsible Sourcing Policy and Standard including supplier training modules on Glencore's commitment to human rights and the VPs. Our Responsible Sourcing Policy and Standard, along with our Group Security Standard, make explicit our requirements for appropriate due diligence on private security providers and adherence to the VPs.

Extensive internal engagement has been undertaken with regional and local Procurement Teams to further embed our commitments into our processes.

An outcome of the 2022 Human Rights Workshop was a commitment to host a series of specific workshops on security and the VPs during 2023, starting in Johannesburg in March, with other regions – Latin America, Kazakhstan, Europe, North America, and Asia/Pacific – planned for the rest of the year.

## Policies, procedures and related activities

Respect for human rights is enshrined in our Code of Conduct, which reflects our Values and our Purpose, and sets our expectations on how to do business safely, responsibly, ethically and legally. It references our commitment to the VPs and we also endorse the VPs within our public Group Human Rights Policy, and through our internal Human Rights and Security Standards.

We disseminate our Values, Code of Conduct, policies, and standards to our industrial assets, where they are included in induction training with annual refreshers for employees. Training on these reflects local and job function needs. Our industrial asset-based management teams also run site-specific training programmes, which reflect local needs and cultures.

The development of our current Group policy architecture and its underlying policies, standards, procedures, and guidelines considered the commitments we are required to meet through our membership and support for external organisations. These include the VPs, the United Nations (UN) Global Compact, International Labour Organization Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights and the ICM's Performance Expectations.

Our current Group Human Rights Policy was peer-reviewed by leading international human rights practitioners, academics, and community members prior to its adoption. The 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.

Our Policy requires our industrial assets to conduct human rights due diligence to identify, prevent and mitigate human rights risks and impacts across our industrial activities.

We aligned our Human Rights and Security Standards with leading practice. They were developed in consultation with Glencore functional specialists and external peer reviewers. Following their rollout in 2021, we are tracking implementation progress through a gap analysis for each industrial asset and targeting substantial implementation by the end of 2023.

Our approach to assurance is designed to be as effective and efficient as possible, and requires our commodity departments to plan and execute assurance plans for their industrial assets that include our Human Rights and Security Standards, with a risk-based prioritisation.

In 2022, our Internal Audit function continued its programme of assurance against the VPs with our industrial assets, with a risk-based prioritisation.

Our HSEC&HR Incident Management Procedure required our industrial assets to monitor and review high-potential security incidents to identify causes and improve controls and management systems. These findings and the lessons learnt are shared across the Group.

We value our relationships with our business partners, so we strive to be fair, open and transparent in our dealings with them. In turn, we expect them to share our commitment to ethical, safe and responsible business practices.

We have a Group target for community and human rights: do not cause or contribute to incidents resulting in severe human rights impacts. We report on our progress against this target in our annual Sustainability Report.

In January 2023, Glencore formalised its Observer status with ICoCA (International Code of Conduct Association for Private Security Service Providers' Association), and has presented and participated in its regional security workshops.

### Assessing security impact, risks, and opportunities

Our Human Rights Standard requires our industrial assets with a high risk rating to conduct a human rights impact assessment (HRIA) using competent third-party external expert(s) and to review, and where required update, the HRIA at least every five years, or sooner if required based on risk. Our Security Standard defines the minimum requirements for our industrial assets to identify, assess and manage security-related threats, risks, and potential impacts to people and assets.

We developed the Security Standard to align with the requirements of our Human Rights and Social Performance Policies and to meet our internal and external commitments. It recognises that from a security perspective our area of influence may be impacted by our private security activities, as well as those undertaken by public security providers.

We require our industrial assets to conduct threat and risk assessments and security vulnerability assessments based on the local security context. These assessments identify security-related threats, risks, and potential impacts to people (including women,

children, Indigenous Peoples, and other vulnerable groups) and our industrial assets.

Our industrial assets must integrate the findings into their business planning and review annually, at both industrial asset and commodity department levels. The security impacts, risks and opportunities are reviewed at a suitable frequency based on risk, and updated, if required, in response to changes in the industrial asset's area of influence and security context.

We require our industrial assets to identify, report, investigate, and record security-related incidents, as well as human rights allegations, community complaints and grievances, impacts or abuses by both public and private security providers as they pertain to the industrial asset, in accordance with our revised HSEC&HR Incident Management Procedure. Our industrial assets must communicate lessons learnt from incident investigations with relevant stakeholders, taking into consideration the classification and sensitivity of security-related information.

### Working with private security providers

We require our industrial assets to conduct due diligence and screening of their private security providers in accordance with our Responsible Sourcing Policy and our internal Responsible Sourcing and Know your Counterparty Standards prior to engaging their services and to verify whether the organisation has:

- The relevant competencies, qualifications, experience, and authorisations as appropriate;

## Policies, procedures and related activities *continued*

- Not been involved in serious breaches of local security laws, use of excessive force and/or security-related human rights abuses, and
- Put processes in place to check individuals working for the organisation have not been involved in serious breaches of local security laws, use of excessive force and/or security-related human rights abuses.

Our industrial assets' contracts with private security providers must document duties, training requirements and the provision of equipment by the industrial asset, and align with local legal requirements, the VPs and the International Code of Conduct for Private Security Services Providers. In addition, the contracts are required to set out the use of force continuum, taking into consideration the requirement for the security provider to develop standard operating procedures and incident response protocols in line with Glencore expectations and the VPs.

Our industrial assets provide training for their private security providers based on the outcomes of the security risk assessment processes and the VPs.

### Working with public security providers

We require our industrial assets to develop and implement communication activities with national and regional governments to discuss security and human rights matters. In addition, where possible, they are required to undertake and document background checks on public security providers to verify the organisation has not been involved in serious breaches of local security laws, use of excessive force and/or security-related human rights abuses.

When possible, our industrial assets facilitate or encourage training on the VPs, and our expectations on the appropriate use of force in line with the VPs and respect for the human rights of individuals. When appropriate, we encourage our industrial assets to enter into a memorandum of understanding, or similar documentation, with public security providers to document mutual commitment to the VPs.

In the Democratic Republic of the Congo (DRC), our industrial assets, Kamoto Copper Company SA (KCC) and Mutanda Mining SARL (MUMI), following increased artisanal mining activity on their concessions, are actively engaging with the DRC government to strengthen their relationship with public security providers and to encourage adherence to the VPs during their activities.

### Security-related incidents

In line with the UN Guiding Principles on Business and Human Rights (UNGPR), we recognise that access to remedy is a core aspect of respecting human rights.

We require our industrial assets to operate grievance processes designed to meet the UNGP Effectiveness Criteria and align with the ICMM Handling and Resolving Local-Level Concerns and Grievances. As such, these are required 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.

In addition to our complaints and grievance mechanisms, we operate Raising Concerns, a Group-wide corporate whistleblowing programme to enable our employees, contractors, and business partners as well as other stakeholders to report any breach of Glencore's Code of Conduct, policies or law.

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.

All our industrial assets must identify, report, and record security-related incidents, as well as human rights allegations, community complaints and grievances, impacts or abuses by both public and private security providers. When appropriate, these are investigated by the industrial asset to identify and implement remedial actions to avoid repeat security-related incidents. Our industrial assets conduct regular reviews of security-related incidents, complaints and grievances and concerns (quarterly at minimum) to identify trends.

Our industrial assets must implement clearly defined Trigger Action Response Plans (TARPs) for the escalation and de-escalation of security incidents.

### Security-related incidents in 2022

During 2022, we recorded various security-related incidents involving our directly-employed, private and public security teams and members of the public. The nature of these incidents was varied and some examples include:

- Mount Isa Mines, Australia: on two separate occasions, individuals illegally accessed the site. Site security escorted the trespassers off the mine concession;
- Cerrejón coal mine, Colombia: several complaints were received from a neighbouring community on verbal and physical aggression by a public security provider. These incidents are under investigation;
- KCC and MUMI copper mines, DRC: illegal intruders entered the site, attacking equipment and workers. Our security personnel took steps to remove the intruders from the industrial sites; and
- Helena chrome mine, South Africa: following the illegal entry into the mine by eight individuals, a Glencore contractor was attacked and robbed. The matter was investigated, and our security teams implemented various measures to stop a reoccurrence.

On 27 April 2022, KCC was informed by the local Prosecutors Office of a fatal shooting incident involving an illegal intruder in its concession. KCC's internal investigation revealed the involvement of a Mine Policeman, a public security provider. KCC fully cooperated with and participated in the local Prosecutor Office's investigation.

In July 2022, we notified the VPs Secretariat of a public security incident and an escalation in the number of illegal miners accessing KCC's concession.



## Country implementation

We launched our VPs implementation programme across the Glencore Group in October 2013, focusing on industrial assets in countries where we identified a high risk of potential security-related human rights impacts.

Our revised Security Standard, rolled out Group-wide during 2021, requires all our industrial assets to develop, implement and monitor security management plans by the end of 2023. The plans should document identified threats, risks, impacts, controls and management strategies within their area of influence, and mitigate security impacts and risks based on the outcomes of the threat and risk assessment.

The plans must align with criteria listed in the VPs and our Security Standard requires all our industrial assets to implement the VPs, unless their review of their internal and external security finds a low risk of security-related threats, risks, and potential impacts.

Our internal audit programme assesses the adequacy and effectiveness of our industrial assets' security management plans. During 2022-23, our internal HSEC audit team are evaluating these plans' compliance with the Voluntary Principles at Koniambo (New Caledonia), Antapaccay (Peru), Coal (South Africa), and Alloys (South Africa).

The Corporate Social Performance and Human Rights team addressed the HSEC audit team's 2022 findings via our Human Rights and Security workshop, see page 2, and subsequent 2023 regional security workshops, see page 3. Additionally, the Corporate Social Performance and Human Rights team is supporting consistent implementation of the VPs across our industrial assets through guidance materials and operational support.

### Addressing threats to human rights defenders in Colombia

Cerrejón has a zero-tolerance policy towards threats and attacks to human rights defenders (HRDs) and has publicly condemned these acts.

Whenever these situations occur, Cerrejón alerts the appropriate authorities and requests immediate action to protect the life and dignity of those affected, as well as an investigation of the incident.

Cerrejón partnered with the Colombian branch of the Institute of Human Rights and Business (CREER) to enhance trust between stakeholders in the La Guajira Province among key actors and to strengthen local capacities to prevent and investigate these cases. The steps agreed by Cerrejón included:

- Publicly expressing its deep concern and condemnation of these deplorable acts;
- Responding to threats to HRDs associated with Cerrejón by:
  - Contacting the affected individual/s and offering support in filing a case with the relevant authorities, and providing information on Cerrejón's protocol to alert authorities
  - Notifying local and national authorities and insisting they investigate threats and/or attacks and act quickly to protect the life, dignity and safety of those affected; and
  - Issuing a press release to publicly condemn the act and to call on prompt investigation and protection from the authorities.

- Publishing in 2018, along with the other large coal producers in Colombia, civil society organisations and state institutions, a joint declaration on cases where HRDs were threatened or attacked, as well as participating in launching a protocol for companies to address these situations;
- Partnering with CREER to support a programme to strengthen the capabilities of local authorities and the community. The programme provides training on roles and responsibilities, and promotes spaces for dialogue to create more trust between the parties;
- Promoting a meeting called by the Ministry of the Interior in 2019 to present its Prompt Attention Plan to social and community leaders. The Plan is designed to prevent threats and attacks on HRDs. Approximately 80 people from La Guajira attended the meeting, including over 30 leaders from Tabaco, the Victims Roundtable and NGOs (Fuerza de Mujeres Wayuu, Nación Wayuu, the Indigenous Consensus Roundtable), plus representatives from local political bodies, government institutions, the armed forces and police departments. A virtual meeting, held during the global pandemic with La Guajira leaders and led by the Ministry of Interior, reinforced the availability of an institutional route to respond to threats against HRDs.

### Implementing the VPs in the Democratic Republic of the Congo (DRC)

In the DRC, we operate two industrial assets, KCC and MUMI located on the Copperbelt close to the DRC's border with Zambia.

KCC is near to the urban area of Kolwezi and MUMI around 40km south-east of KCC in a rural area. The combination of KCC's proximity to Kolwezi, its widespread poverty and the close proximity of around 250,000 people living on the boundary of the concession areas, as well as the presence of a large number of illegal miners who threaten the integrity of the industrial asset, has created various security challenges for KCC.

Both KCC and MUMI have taken steps to adhere to the VPs in their engagement with their private and public security providers. These include:

- Providing training on the VPs and human rights to their private security providers;
- Memorandums of understanding (MoUs) with the national Mine Police (the PNC) that are present in the region and who, by law, are permitted to support extractive companies in challenging environments. The MoUs stipulate our expectations on their conduct in respect of human rights; and
- Delivering awareness training on the VPs to the Mine Police through site safety and security inductions.

## Country implementation *continued*

In mid-2020, Glencore's three-yearly VPs verification presentation detailed a tragic incident in 2019 during which part of KCC's open pit collapsed leading to fatalities of illegal artisanal miners. At the time of the incident and subsequently, Glencore communicated proactively with the DRC authorities and the VPs Steering Committee on the steps it was taking to address the security of its industrial assets and management of our human rights risks.

In 2019, just prior to the incident, trespassing on KCC's concession peaked at 2,000 illegal intruders and artisanal miners each day. KCC's site was secured following a government decision for the DRC armed forces (FARDC) to intervene as well as the removal of the local buying counters located outside our KCC's concession. When the FARDC arrived, KCC distributed copies of the VPs with its commanding officers and set out its expectations on the soldiers' behaviour.

Since then, the FARDC contingent, who have been reduced from 800 to 200 soldiers, continue to patrol KCC's concession boundary. KCC does not have either a contract or MoU with the FARDC.

Communication with both the FARDC and PNC is conducted through an appropriate chain of command, and tactical decisions are at the discretion of the FARDC and PNC.

The KCC security strategy involves a layered security concept, supported by:

- Physical and technological controls to strengthen the perimeter and internal mine infrastructure;
- Effective governance of public security personnel; and
- Reinforced PNC and private security personnel capacity and capability.

As part of this approach, KCC has built a wall around its operational perimeter as a demarcation and deterrent. Not all of the trespassers are focused on artisanal mining and there is rising petty crime in the region, including stealing and/or damaging equipment. Those trespassing in KCC's open pit can be violent towards its employees and contractors, as well as steal their personal belongings.

KCC is focusing on improving its operational controls, such as strengthening its perimeter controls through the use of CCTV and deploying other visibility-improving technology. The FARDC presence provides an element of deterrence and response capability although they are not part of KCC's long-term security strategy.

In the current situation, the military presence is acting as a deterrent. KCC recognises the risks of corrupt behaviour, misuse of lethal force and human rights violations with both public and private security forces.

The PNC, under law, are remunerated daily through a formal process, but the FARDC are not, in the absence of any agreement or MoU with the Ministry of Defence. While the FARDC are present, KCC is providing in-kind support to help ensure the soldier's basic needs are met, which helps to maintain trust, cooperation and open communication.

KCC continue to work with the PNC to improve capacity and capability to build redundancy, should the FARDC be redeployed elsewhere by the state.

KCC is prioritising the core elements of its security strategy to reduce its passive dependency on the FARDC, however, this will be dependent upon whether the PNC can increase its capacity to effectively mitigate the threat posed by the illegal miners and trespassers.

KCC recognises the need for ongoing cooperation and support by the DRC government and other VPs members to implement its security strategy successfully and in a manner that is consistent with its and Glencore's human rights commitments.



## Additional information

### Glossary

#### DCAF

DCAF (the Geneva Centre for Security Sector Governance)

#### DRC

Democratic Republic of the Congo

#### HSEC&HR

Health, safety, environment, social performance and human rights

#### human rights

Rights inherent to all human beings, regardless of nationality, sex, ethnicity, colour, religion, language, place of residence, or any other status. These rights are universal, indivisible and interdependent and extend to civil, political, economic, social and cultural rights, environmental rights, rights to livelihood, workers' rights and protection of vulnerable groups.

#### human rights impact assessment (HRIA)

A method for identifying and analysing potential and actual human rights impacts to a rights holder (e.g., changes to livelihoods, health and wellbeing). Impacts can be both positive and negative.

#### ICMM

International Council on Mining and Metals

#### industrial activities

Glencore term covering activities of the Group's industrial assets focused on exploring, extracting, processing, refining and delivering commodities, which generally provide a source of physical commodities for the Group's marketing activities.

See 'marketing activities'.

#### industrial asset

An operation involved in the extraction, production or processing of minerals and metals and energy products for sale or further processing. An industrial asset may comprise several sites in different locations under the same management control supporting these activities, with 'our industrial assets' being the industrial assets over which Glencore has operational control.

#### KCC

Kamoto Copper Company SA

#### marketing activities

Glencore term relating to the marketing and trading of commodities, which focuses on sourcing a diversified range of physical commodities from third-party suppliers and from industrial assets in which Glencore has full or part ownership interests. These commodities are sold, often with value-added services such as freight, insurance, financing and/or storage, to a broad range of customers and industrial commodity end-users.

See 'industrial activities'.

#### Memorandum of understanding (MoU)

A document that describes the broad outlines of an understanding that two or more parties have reached. MoUs communicate the mutually accepted expectations of all the parties involved.

#### MUMI

Mutanda Mining SARL

#### operational control

Where Glencore directly or indirectly controls and directs the day-to-day management and operation of the entity engaging in such activity, whether by contract or otherwise.

#### operating jurisdictions

The jurisdictions where we control or operate an industrial asset.

#### policy

A document issued by Glencore with a Group-wide scope, setting out the high-level approach and requirements on a topic. Group-wide scope means the approach and requirements apply to all regions and business activities.

#### private security

Outsourced or contracted security providers, typically referring to private security guard forces or private security companies that are for-profit businesses.

#### procedure

A document issued by the Group which establishes requirements and defines the specific steps that must be taken to implement those requirements, generally as required by Group policies and standards.

#### public security providers

Security providers that represent the regional or national government, commonly the police or armed forces.

#### rights holders

People whose human rights could be, or are, affected by Glencore's activities.

#### rules of engagement

Unique set of guidelines for when and how to apply the use of force continuum.

#### security risk assessment

The combined effort of identifying and analysing potential events that may negatively impact individuals, assets, environment, reputation; and making judgments on the tolerability of the risk on the basis of a risk analysis while considering influencing factors.

#### security vulnerability assessment (SVA)

The process of identifying, quantifying, and prioritising (or ranking) the vulnerabilities in a system and focusing on consequences for the object itself and secondary consequences for the surrounding environment.

#### stakeholders

All individuals and groups that have an interest in, or can either impact or be impacted by, Glencore's business which may include employees, shareholders, debt providers, communities, suppliers, customers, governments, and civil society.

#### standard

A document issued by Glencore which sets out the key requirements established on a particular topic. It contains detailed requirements that support the principles set out in the Code of Conduct or a policy. A standard does not set out the step-by-step process of how the specific requirements should be met.

#### threat

Intention to cause harm, focusing on an actor's intentions and the harm those intentions can cause.

#### threat and risk assessment (TRA)

The practice of determining the credibility and seriousness of a potential threat, as well as the probability that the threat will become a reality.

## **Additional information** *continued*

### **Trigger Action Response Plan (TARP)**

A document detailing the actions required in response to a particular scenario (trigger). Typically, different from business as usual/standard operating practices.

### **UNGP**

United Nations Guiding Principles on Business and Human Rights

### **workforce**

References to our workforce include both employees and contractors under our direct supervision.

### **VPs**

Voluntary Principles on Security and Human Rights

### **VPIs**

Voluntary Principles Initiative

### **vulnerable groups**

An individual person or groups of people who hold specific characteristics that limit their ability to respond to changes. These characteristics include age, ethnicity, race, sex, Indigenous status, level of education, or disability. It includes groups or individuals who may have difficulty in participating meaningfully in asset engagement and decision-making processes; those who are more severely affected by a site's impacts; and/or who are less able to take advantage of a site's benefits.

## Additional information *continued*

### Important notice

Important notice concerning this report including forward-looking statements

Given the focus of this document, it is necessarily oriented towards future events and therefore contains statements that are, or may be deemed to be, “forward-looking statements” which are prospective in nature. Such statements may include (without limitation) statements in respect of trends in commodity prices and currency exchange rates; demand for commodities; reserves and resources and production forecasts; expectations, plans, strategies and objectives of management; climate scenarios; sustainability performance (including, without limitation, environmental, social and governance) related goals, ambitions, targets, intentions, visions, milestones and aspirations; approval of certain projects and consummation of certain transactions (including, without limitation, acquisitions and disposals); closures or divestments of certain assets, operations or facilities (including, without limitation, associated costs); capital costs and scheduling; operating costs and supply of materials and skilled employees; financings; anticipated productive lives of projects, mines and facilities; provisions and contingent liabilities; and tax, legal and regulatory developments.

These forward-looking statements may be identified by the use of forward-looking terminology, or the negative thereof including, without limitation, “outlook”, “guidance”, “trend”, “plans”, “expects”,

“continues”, “assumes”, “is subject to”, “budget”, “scheduled”, “estimates”, “aims”, “forecasts”, “risks”,

“intends”, “positioned”, “predicts”, “projects”, “anticipates”, “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.

The information in this document provides an insight into how we currently intend to direct the management of our businesses and assets and to deploy our capital to help us implement our strategy. The matters disclosed in this document are a ‘point in time’ disclosure only. 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 conditions and discussions of strategy, and reflect judgments, assumptions, estimates and other information available as at the date of this document or the date of the corresponding planning or scenario analysis process.

By their nature, forward-looking statements involve known and unknown risks, uncertainties and other factors which may cause actual results, performance or achievements to differ materially from any future event, results, performance, achievements or other outcomes expressed or implied by such forward-looking statements. Important factors that could impact these uncertainties include (without limitation) those disclosed in the risk management section of our latest Annual Report and Half-Year Report (which can each be

found on our website). These risks and uncertainties may materially affect the timing and feasibility of particular developments. Other factors which impact risks and uncertainties 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; changes in environmental scenarios and related regulations, including (without limitation) transition risks and the evolution and development of the global transition to a low carbon economy; recovery rates and other operational capabilities; health, safety, environmental or social performance incidents; natural catastrophes or adverse geological conditions, including (without limitation) the physical risks associated with climate change; the outcome of litigation or enforcement or regulatory proceedings; the effect of foreign currency exchange rates on market prices and operating costs; actions by governmental authorities, such as changes in taxation or regulation or changes in the decarbonisation plans of other countries; and political uncertainty.

Readers, including (without limitation) investors and prospective investors, should review and take into account these risks and uncertainties (as well as the other risks identified in this document) when considering the information contained in this document. Readers should also note that the high degree of uncertainty around the nature, timing and magnitude of climate-related risks, and the uncertainty as to how the energy transition will evolve, makes it difficult to determine and disclose the risks and their potential impacts with precision. Neither Glencore nor any of its affiliates, associates, employees, directors, officers or advisers, provides any representation, warranty, assurance or guarantee that the occurrence of the events, results, performance, achievements or other outcomes expressed or implied in any forward-looking statements in this document will actually occur. Glencore cautions readers against reliance on any forward-looking statements contained in this document, particularly in light of the long-term time horizon which this report discusses and the inherent uncertainty in possible policy, market and technological developments in future.

No statement in this document is intended as any kind of forecast (including, without limitation, a profit forecast or a profit estimate), guarantees or predictions of future events or performance and past performance cannot be relied on as a guide to future performance. Neither Glencore nor any of its affiliates, associates, employees, directors, officers or advisers, provides any representation, warranty, assurance or guarantee as to the accuracy, completeness or correctness, likelihood of achievement or reasonableness of any forward-looking information contained in this document.

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.

Except as required by applicable regulations or by law, Glencore is not under any obligation, and Glencore and its affiliates expressly disclaim any intention, obligation or undertaking, to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise. This document shall not, under any circumstances, create any implication that there has been no change in the business or affairs of Glencore since the date of this document or that the information contained herein is correct as at any time subsequent to its date.



## **Additional information** *continued*

Certain statistical and other information about Glencore included in this document is sourced from publicly available third-party sources. As such it has not been independently verified and presents the view of those third parties but may not necessarily correspond to the views held by Glencore and Glencore expressly disclaims any responsibility for, or liability in respect of, and makes no representation or guarantee in relation to, such information (including, without limitation, as to its accuracy, completeness or whether it is current). Glencore cautions readers against reliance on any of the industry, market or other third-party data or information contained in this report.

Subject to any terms implied by law which cannot be excluded, Glencore accepts no responsibility for any loss, damage, cost or expense (whether direct or indirect) incurred by any person as a result of any error, omission or misrepresentation in information in this report.

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.

## Additional information *continued*

### Contact us

#### Glencore plc

Baarermattstrasse 3  
6340 Baar Switzerland

Tel: +41 41 709 2000

E-mail: [info@glencore.com](mailto:info@glencore.com)

[glencore.com](http://glencore.com)

In addition to this Voluntary Principles Annual Report, our annual corporate reporting suite reflects our commitment to transparent disclosure across a broad range of topics:

- 2022 Annual Report
- 2022 Sustainability Report
- 2022 Ethics and Compliance Report
- 2022 Payments to Governments Report

### About Glencore

Glencore is one of the world's largest global diversified natural resource companies and a major producer and marketer of more than 60 commodities that advance everyday life. Through a network of assets, customers and suppliers that spans the globe, we produce, process, recycle, source, market and distribute the commodities that support decarbonisation while meeting the energy needs of today.

With around 140,000 employees and contractors and a strong footprint in over 35 countries in both established and emerging regions for natural resources, our marketing and industrial activities are supported by a global network of more than 40 offices.

Glencore's customers are industrial consumers, such as those in the automotive, steel, power generation, battery manufacturing and oil sectors. We also provide financing, logistics and other services to producers and consumers of commodities.

#### Our culture

We fulfil our purpose and deliver on our strategy in a manner that reflects our values of safety, integrity, responsibility, openness, simplicity and entrepreneurialism. Only by actively living and breathing these values are we able to ensure our culture is conducive to fulfilling our purpose and delivering on our strategy

#### Our Purpose

Responsibly sourcing the commodities that advance everyday life.

#### Our strategy

To sustainably grow total shareholder returns while maintaining a strong investment grade rating and acting as a responsible operator.



#### Safety

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



#### Responsibility

We take responsibility for our actions. We talk and listen to others to understand what they expect from us. We work to improve our commercial, social, and environmental performance



#### Simplicity

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



#### 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



#### Openness

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



#### 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