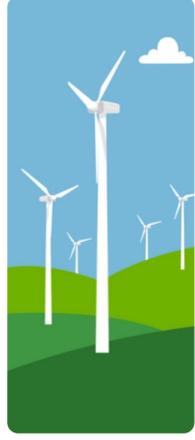


Our approach to Responsible Sourcing



Governing our responsible sourcing programme

Continuous improvement



The Glencore Board sets the strategic direction for the Group's sustainability activities, including responsible sourcing.

Responsibility for implementing and monitoring our responsible sourcing programme across the Group rests with Glencore's senior management.

Implementing our responsible sourcing programme

Continuous improvement

Glencore's policy framework and its supporting Policies, Standards, Procedures and Guidelines are designed to embed our commitment to responsible sourcing.



Training our employees

Continuous improvement

We provide our employees, as well as contractors under our direct supervision, with regular trainings that are designed to enhance their understanding and implementation of our Responsible Sourcing Policy and Standard.



Identifying and managing supply chain risks

Continuous improvement

Our risk identification and management approach includes due diligence, selection, onboarding, and monitoring of suppliers, through to corrective actions and disengagement.



01 - Identify risks

We use a risk identification process to determine if a potential supplier is in scope of responsible sourcing due diligence.

02 - Assess risks

If a supplier is identified as requiring supply chain due diligence, we assess the extent to which they meet our Supplier Code of Conduct's expectations and requirements.



03 - Mitigate risks

Depending on the findings and if relevant and feasible, we work with the supplier to develop a bespoke corrective action plan.

04 - Engage with suppliers

We engage with suppliers to communicate our expectations via face to face and online training. We conduct supplier assurance in selected high-risk jurisdictions.



Understanding and measuring our effectiveness and performance

Continuous improvement

We regularly evaluate the effectiveness of our systems for identifying and managing responsible sourcing related risks and consider our overall performance.

Local complaints and grievances mechanisms

We consider access to remedy to be a core aspect of our management. We require all our industrial assets to operate local grievance mechanisms for our stakeholders.

Speaking openly and raising concerns

We encourage our suppliers and indirect suppliers to speak openly and raise concerns about possible breaches of our Supplier Code of Conduct.

Internal assurance

Group Internal Audit and Assurance provides assurance to help strengthen governance and controls.

External audits

External third parties annually review our metals and minerals responsible sourcing programme.

Reporting publicly

Continuous improvement

Our annual Modern Slavery Statement provides a comprehensive overview of the activities of our Responsible Sourcing programme for the previous calendar year.

glencore.com/publications



Continuous improvement

Continuous improvement

The Responsible Sourcing team regularly seeks feedback to ensure that we are incorporating on-the-ground inputs and any relevant local developments into our programme.



Engage with stakeholders

We participate in a variety of multi-stakeholder initiatives that are relevant to human rights in the supply chain.



Looking ahead



We are participating in the development of technological solutions aimed at increasing transparency in the supply chain.



Please find more information on our website at glencore.com