



Energising today
Advancing tomorrow

Contents

Energising today, advancing tomorrow: As the world moves towards a low-carbon economy, we are focused on supporting the energy needs of today whilst investing in our portfolio of transition-enabling commodities.

Welcome to Glencore’s 2024 Voluntary Principles on Security and Human Rights Report.

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

This report covers the actions Glencore has taken to implement the VPSHRs during 2024 at our industrial assets. It excludes our activities at our marketing offices.

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Explore our Group Reporting Glossary online at: glencore.com/publications

Implementing the Voluntary Principles on Security and Human Rights

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 (HSEC&HR) programmes.

Its members are John Wallington (Chair), Cynthia Carroll and Kalidas Madhavpeddi. All three members are non-executive directors with extensive operational experience. Their knowledge and understanding, acquired through operational roles, equips them to oversee the embedding of HSEC&HR principles, including those relevant to the implementation of the VPSHRs, into our corporate culture, policy, and strategy.

Our Chairman and CEO reference our membership of the VPSHRs, 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 on Business and Human Rights (the UNGPs) and the UN Global Compact. Our Human Rights Policy also aligns with the International Council on Mining & Metals (ICMM) Mining Principles 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.

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

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.

Our Human Rights Policy requires that if our industrial assets cause or contribute to an adverse impact on human rights, these are reported internally and investigated at a local level. We provide for, or cooperate in, processes to enable appropriate remedy and/or a corrective action plan.

Our HSEC&HR Incident Management Procedure requires classification of social performance, human rights and other incidents and sets out the process for capturing, reporting and recording 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.

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.

Engagement in the Voluntary Principles Initiative (VPI)

Our participation in the annual VPI 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.

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 VPSHRs.

Since 2022, we have been an observer of the International Code of Conduct Association for Private Security Service Providers' Association (ICoCA), with this role formalised in early 2023. During 2024, we participated in ICoCA's newly established Client Working Group.

In May 2024, we participated in the annual VPI Plenary in Washington, which provided knowledge building and networking opportunities. Throughout the year, we continued to take part in the corporate pillar calls, which enable us to input into the activities of the VPI. In addition, we provided comprehensive feedback on the proposed amendments to the VPI's governance framework.

Our local teams participate in the in-country working groups active in Peru (both at a national level in Lima and regionally in Cusco) and the DRC. Our team in Santiago attended the launch of the Chile in-country working group, hosted by the UK Embassy in September 2024, and will participate in this working group as it moves forward in advancing the VPSHRs.

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In Peru, DCAF (the Geneva Centre for Security Sector Governance) provides support to both the national and regional VPI working groups through its affiliate, Guaman Poma. We are active in both working groups and welcome the opportunity they afford to engage with local civil society organisations and academia.

The national mining association, the Sociedad Nacional de Minería Petróleo Y Energía, has a VPSHR working group, in which our industrial asset Antapaccay participates. This working group has conducted training and shares case studies contributed by members.

We are a member of the DRC working group of the VPI, which is led by the US embassy and includes representatives from other embassies, the private sector, civil society and government. It is supporting the government to develop a National Action Plan to implement the VPSHRs in the DRC since officially joining the VPI in May 2023. We also participated in a multi-stakeholder advisory group that supported the DRC's application to join the VPI.

Beyond the VPSHRs in-country working groups, we may also participate in multi-stakeholder initiatives to address security-related challenges, for example see details on a collective mining forum in South Africa on page 6.

Transparency

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

We have been a member of the International Council on Mining and Metals (ICMM) since 2014. Our Group policies and standards are designed to align with the ICMM Performance Expectations and Position Statements. We are working to update our relevant policies and standards where needed to align with the latest versions published by ICMM. These include a commitment to uphold human rights and to address risks relating to security-related human rights breaches.

Supplier training modules on Glencore's commitment to human rights and the VPSHRs are required by our Responsible Sourcing Policy and Standard. 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 VPSHRs.

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

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 VPSHRs, and we also endorse the VPSHRs within our Human Rights Policy, and through our internal Human Rights and Security Standards.

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

Our policy architecture supports our governance for overseeing the achievement of our Group HSEC&HR targets, which includes a target to not cause or contribute to incidents resulting in severe¹ human rights impacts.

¹ Severe is the equivalent of catastrophic and major on Glencore's incident classification scale. For human rights, a catastrophic incident is one with a gross human rights violation or grave systemic human rights impacts and a major incident involves an isolated grave or serious abuse of human rights.

Implementing the Voluntary Principles on Security and Human Rights *continued*

Our 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. The 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 also align our Human Rights and Security Standards with leading practice. They were developed in consultation with Glencore functional specialists and external experts. Their rollout has been supported by training and regional workshops, as described in the *Strengthening internal knowledge* section.

During 2023, we reviewed and updated our Security Standard to clarify and strengthen the approvals process for high-risk security contexts and firearms. This revised standard was proactively disseminated via the regional security workshops.

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

In 2024, we revised and relaunched our HSEC&HR Strategy (the Strategy), a five-year programme of work focusing on nine material priority topics. Security is addressed as a separate pillar in the Strategy, further reinforcing our commitment to the VPSHR and the importance of effective security management for our business and our stakeholders.

The Strategy defines our level of ambition and risk appetite through goals, priorities and objectives from 2024 to 2028. Through internal and external key performance indicators (KPIs) and targets, it allows us to measure and demonstrate performance. It aligns with our Purpose and Values and considers our stakeholders' expectations.

The Strategy acknowledges that our industrial assets are at various stages of maturity, and that their priorities need to reflect their risk profiles. Each of our industrial commodity departments is required to develop and document its own HSEC&HR strategies and associated annual plans in line with the requirements and expectations set out in the Strategy.

Over the next five years, through our delivery of the Strategy, we are focusing on improving the way we identify, assess and manage security-related risks, by:

- proactively managing security threats and risks;
- training our security teams and other relevant industrial asset teams; and
- improving our management of security-related incidents.

In 2024, we commissioned a third-party subject matter expert to undertake a review and update of our salient human rights risks. As part of this review, extensive peer benchmarking was completed and internal and external stakeholders were interviewed to ensure a robust, balanced and defensible saliency review. Security remains amongst our most prominent human rights risks and continues to be a priority for our business.

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 report our performance against our Group target to not cause or contribute to incidents resulting in severe human rights impacts in our Annual Report.

Strengthening internal knowledge

Following a series of regional security workshops and learning forums held in 2023 to promote our industrial assets' alignment with our Security Standard and the Group-wide implementation of the VPSHRs, we continue to support our industrial assets' implementation of our Security Standard.

Regional learning forums during 2024 have promoted cross-commodity and peer learning as an approach of continuous improvement. These forums were held in Johannesburg, South Africa and Barranquilla, Colombia. In addition, our internal security working group developed and promoted new guidance materials including updated model clauses to support VPSHR alignment for private security contracts and public security engagement, and tailored support tools for security specific risk assessment and security risk scenario trigger-action-response-planning.

Moving forward, we will maintain the dialogue on security and human rights through regional security learning forums to further embed consistency of practice and cross functional engagement.

Implementing the Voluntary Principles on Security and Human Rights *continued*

Reviewing our performance

Our approach to assurance is designed to be both effective and efficient 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.

Group Internal Audit and Assurance (GIAA) provides independent and objective assurance to help strengthen governance and controls. The Audit Committee reviews and approves the risk-based GIAA audit plan and the HSEC and ECC Committees review and endorse relevant components of the plan. The Committees are regularly updated on the status of delivery against the audit plans, relevant findings, and the progress on the implementation of agreed management actions.

In 2024, GIAA performed audits of our Social Performance and Human Rights Standard at Antapaccay in Peru, Kroondal Mine in South Africa, Prodeco in Colombia, McArthur River Mine in Australia, and Raglan Mine in Canada. Although not focused specifically on security, this audit considered our broader human rights due diligence and operational effectiveness.

In 2025, GIAA will undertake a series of security specific audits.

Assessing security impact, risks, and opportunities

Our Human Rights Standard requires our industrial assets with a high- or medium-risk rating to conduct a human rights impact assessment (HRIA), or a human rights risk assessment (HRRRA), using competent third-party external expert(s). These are reviewed and, where required, updated, at least every five years for a HRIA, or at least every two years for a HRRRA, or sooner if required based on risk. Risk ratings for human rights are based on our human rights risk rating tool, a bespoke screening process to provide consistent but preliminary human rights risk ratings for all industrial assets. 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 bodies.

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 them annually, at both industrial asset and commodity department levels. The security impacts, risks and opportunities are reviewed at a regular 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, including impacts or abuses by public security bodies, in accordance with our 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, Contractors and Suppliers HSEC&HR Management, Security, 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;
- 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.

Any new contracts that our industrial assets conclude must document duties, training requirements and the provision of equipment by the industrial asset and align with local legal requirements and the VPSHRs. 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 requirements and the VPSHRs.

Our industrial assets provide training for their private security providers that reflects the outcomes of the security risk assessment processes and the VPSHRs.

Implementing the Voluntary Principles on Security and Human Rights *continued*

Working with public security bodies

We require our industrial assets to develop and implement communication protocols with relevant government agencies to discuss security and human rights matters. In addition, where possible, they are required to undertake and document background checks on public security bodies 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 VPSHRs, and our expectations on the appropriate use of force in line with the VPSHRs and respect for the human rights of individuals. When appropriate and feasible, we encourage our industrial assets to enter into a memorandum of understanding, or similar written documentation, with public security bodies to document mutual commitment to the VPSHRs.

In the DRC, in response to risks relating to artisanal mining, our industrial assets, Kamoto Copper Company SA (KCC) and Mutanda Mining SARL (MUMI), engage with the DRC government, the Mine Police and civil security to encourage adherence to the VPSHRs during their activities in our operating regions.

In South Africa, to support a coordinated and strategic approach on regional security-related matters, we participate in a collective mining security forum. The forum is made up of representatives from other mining companies operating in the Eastern Limb region and includes both local and provincial police from across the Mpumalanga and Limpopo provinces. The forum discusses common security concerns in the Eastern Limb region and collaborates on opportunities to identify and implement positive security actions that benefits community safety.

Mining companies in the two provinces also support the Public Order Police to maintain the positive momentum that has been created following previous instances of social unrest. We are also working with mining companies and the Minerals Council of South Africa on a memorandum of understanding with the Mpumalanga Province South African Police Services department for the redeployment of Public Order Police in Lydenburg

We utilise local security contractors, providing local employment opportunities and enabling the company to be seen as a positive community partner.

Security-related incidents

In line with the UNGPs, 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 UNGPs' Effectiveness Criteria. 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, with escalation and review of serious issues to Group level.

In addition to our complaints and grievance mechanisms, we operate our Raising Concerns Programme, 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, procedures or the law. Our Raising Concerns platform is available to all stakeholders, including employees and contractors, and includes a 24/7 confidential reporting line.

We do not tolerate retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct, policies and procedures, even if the concern is not substantiated, and so long as it has not been raised knowing it is false.

We continually monitor these processes to identify improvement opportunities.

Security-related incidents in 2024

We are aware of the following security-related incidents relating to this report at our industrial assets during 2024:

Colombia

In February, an individual made a complaint that a security guard engaged in verbal aggression, and took their children's bikes and, without permission, gave them to the police. Cerrejón conducted an investigation that involved interviews with its private security workers, the police and community members, as well as analysing reports. As a result, Cerrejón found that the security worker had followed procedures and responded appropriately to instructions provided by the police. There was no evidence of the alleged verbal aggression from the security worker towards the children, and eye witness accounts did not support the claim of disrespect being shown towards the children and their mother. The bicycles were returned, and the investigation found that there was no impact requiring compensation. The complaint was officially closed following a meeting of those involved in August.

In February, a complaint was made by an Indigenous community member in respect of an incident that took place in January 2018 that involved army personnel who were present in the area for reasons not related to Cerrejón's activities. The complaint alleged that the army personnel approached a community member as they drove away from a burial ceremony in a neighbouring community.

Implementing the Voluntary Principles on Security and Human Rights *continued*

The community expectation was for Cerrejón to alert the army about the burial ceremony and to have informed the community of the army's presence in the area.

The army had placed barriers in the road to stop cars and, during the incident, shots were allegedly fired endangering the individual's life. Cerrejón conducted interviews with the community to strengthen its understanding of the incident.

No link to Cerrejón has been found and there is no official report on the incident having taken place and the case has been closed.

Democratic Republic of the Congo

Our KCC copper industrial asset provides regular training on the VPSHRs to its security employees and contractors. While it has a memorandum of understanding (MoU) with the national police force, it does not have one with the FARDC (DRC military force). The MoU with the police sets out Glencore's commitment to and implementation of the VPSHRs. KCC provides regular training on applying the VPSHRs and respect for human rights to the police operating in the area around KCC's concession.

In 2019, the FARDC were deployed to the region in response to a mass fatality of artisanal miners in KCC's KOV pit². At the time, KCC provided the FARDC leaders with the VPSHRs and set out its expectations around respecting human rights. To date, the FARDC remain in the area.

Responding to community concerns

KCC's Community Development Programme (CDP) and security team have regular interactions with local community representatives, which include discussing issues relating to security and human rights. As a result, the community is empowered to raise concerns or submit complaints via local complaints and grievances processes, on social, environmental, and security-related incidents.

For example, in January 2024, KCC's CDP team received a telephone call from the community leader reporting a member of the police harassing artisanal miners close to, but outside of, KCC's concession.

Separately, the president of an ASM cooperative also informed the KCC security team of the same matter.

² www.glencore.com/media-and-insights/news/FARDC-in-area-around-Kamoto-Copper-Company

KCC's security team relayed this information to a senior member of the police, who in turn removed the individual from the area. No further action was taken.

Protests by artisanal miners

In April 2024, over 200 artisanal miners made an unsuccessful attempt to access one of MUMI's mining concessions. Teams from MUMI, private security teams and police managed the situation, making 10 arrests. Six individuals were subsequently released and four were transferred to the Public Prosecutor's Office in Kolwezi. Three private security workers required medical treatment; there were no injuries to the artisanal miners.

The next day, over 100 artisanal miners staged a protest against MUMI at the mine's main entrance about the previous day's incident. As some of the protestors were armed with machetes and catapults and threw stones and set tyres on fire, teams from MUMI, private security, police and the FARDC attended the incident. Six hours after the protest began, it was peacefully dispersed by the public security forces without physical confrontation.

Four of MUMI's security personnel and one private security worker sustained minor injuries; MUMI is not aware of any injuries to the protestors.

Protest against a fatal shooting

In May, KCC's security team became aware of a shooting incident close to the Musonoie settlement. The security team arrived at the location and found a deceased victim surrounded by family and friends; the FARDC was also present.

KCC was not directly involved in the incident, but understands that a member of the FARDC shot a community member. We understand that the accused individual is under arrest and being tried via the military courts.

Around 50 community members protested against the shooting, resulting in damage to KCC's KOV dispatch office. The police subsequently arrived and dispersed the crowd in a non-violent manner. The police took the deceased to KCC's Kamoto Hospital mortuary.

Shooting of an unauthorised miner

In November 2024, KCC's security team received an anonymous phone call reporting a fatal shooting of an unauthorised person in KCC's KOV open pit. KCC's Emergency Response Team (ERT) and Asset Protection Team (APT) deployed and confirmed the presence of a deceased individual lying next to a road exiting KOV.

The circumstances leading to the individual's death were unclear. However, a group of people standing near the deceased reported that the individual was fatally shot by a member of the FARDC. Based on this, the individual responsible was promptly arrested by a FARDC Captain.

Implementing the Voluntary Principles on Security and Human Rights *continued*

The shooting took place in an area where KCC's mining activities have ceased but unauthorised mining activities continue to occur, despite ongoing efforts by the APT to close galleries. In the KOV open pit, the gallery closure rate has reached nearly 50% after the successful closure of all the galleries in the Mashamba open pit.

In line with KCC's protocols, the APT Supervisor alerted the ERT, KCC Watu Wetu Clinic, and legal team. The deceased was transported to a local mortuary. KCC's legal team coordinated external stakeholder communications.

Use of force

In our 2023 VPSHR Report we noted that a civil society organisation had raised a concern relating to the inappropriate use of force at KCC in the DRC. In response, we appointed an external legal firm to investigate this allegation, who retained security experts to support their work. The investigation was ongoing at the time of the 2023 report's publication and we committed to reporting on its conclusions, recommendations and any remedy taken in our 2024 report.

The investigation identified that there was a very challenging and high pressure security situation at KCC that was not always managed effectively by the KCC internal security team and was compounded by substantive failings by the security contractors, including failure to comply with local procedures that had not been fully updated to match Glencore standards.

South Africa

Our Rhovan vanadium operation in South Africa is partially owned by the local community, with minority stake held through a trust. In April 2024, the roads leading to Rhovan were unlawfully blocked by local community members. The blockade prevented both access to and exit out of the Rhovan operations by our employees and contractors.

The Rhovan management team indicated to the protest leaders that they were prepared to engage with all aggrieved parties through existing and recognised structures once the unlawful behaviour had ceased. Rhovan received no formal correspondence on the grievances or demands of the protesters nor an explanation of who the bodies were that they represented. Rhovan was not part of the negotiation process between the police and community representatives.

The blockade was intermittent and took place on and off for over a month. Towards the end of this period, the police received an order to disperse the demonstrators. Rhovan management subsequently learnt that in the course of actioning this order, the police used rubber bullets to temporarily disburse the protestors.

The local government and municipality subsequently established a mediation process, in which Rhovan participated. Rhovan worked constructively with police services, the Department of Cooperative and Traditional Affairs, and representatives from the local municipality and provincial government to reach a mutually agreed and mediated outcome. This resulted in the end of the blockade and a recommitment by Rhovan to provide jobs at its planned solar power plant to local community members.

Rhovan has offered both training and a MoU on the VPSHRs with the police. It annually writes to the police setting out Glencore's commitment to the VPSHRs and its expectations on the use of force. To date, no training has been undertaken and it is unlikely that an MoU will be able to be concluded in the current socio-political environment.

Country implementation

We launched our VPSHRs 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 Security Standard, which was rolled out Group-wide during 2021 and strengthened in 2023, requires all our industrial assets to develop, implement and monitor security management plans. 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.

Our Security Standard requires all our industrial assets to implement the VPSHRs, 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 for a rolling sample of high- and medium-risk industrial assets.

Our Corporate Social Performance and Human Rights team supports consistent implementation of the VPSHRs across our industrial assets through guidance materials and operational support.

Implementing the Voluntary Principles on Security and Human Rights *continued*

Our Copper commodity department's approach to security in Peru

Our Antapaccay copper industrial asset, in the Espinar Province in Peru has taken steps to implement the VPSHRs since 2020, integrating this commitment in its interactions with its employees and collaborating companies.

Antapaccay's Human Rights Policy includes a commitment to the VPSHRs, and it has an established Human Rights Committee that includes regional managers from our South American industrial assets, managers from Antapaccay's operational areas and is chaired by its General Manager. One of this committee's main tasks is to identify, analyse and manage Antapaccay's human rights risks to prevent negatively impacting human rights.

Antapaccay arranges regular training sessions for its security employees and private security contractors on respecting human rights and implementing the VPSHRs, as well as how to engage with community members.

Antapaccay's private security contractor has its own human rights policy that commits it to respect human rights in its activities and business relationships in line with international standards and regulations. Antapaccay's contract requires that the private security contractor's employees do not have a criminal record and have not been discharged from the Peruvian National Police (PNP) or armed forces for disciplinary reasons or involved in human rights violations. Antapaccay verifies all background information for the private security contractor's employees before they are hired, which aligns with the National Private Security regulations. We require the private security contractor to provide

ongoing training on the VPSHRs and there have been no reported incidents related to the use of force over the last five years.

In 2023, in Espinar, groups organised protests to express discontent with the national government. Some of these actions impacted sectors, including mining, that were perceived to be able to influence political decisions. The protests reflected broader discontent with government policies and were part of a larger movement aimed at pressuring authorities to respond to their demands. Similar actions took place across Peru.

The activities in Espinar included blockades on the access roads to the province and destructive attacks on Antapaccay's infrastructure, that endangered the physical safety of its employees and contractors. The police presence in the area was limited.

Following these protests, in July 2023, Antapaccay and the PNP signed a two-year agreement for the provision of extraordinary police services, ensuring the presence of police officers throughout the year to promote internal order and public security in the area.

While similar agreements between companies and the PNP have faced social and legal criticism, the Peruvian Constitutional Court has recognised that private companies can have an extraordinary agreement with the PNP that follows legal criteria and includes respect for human rights. Antapaccay's agreement includes a clause on its Human Rights Policy and the VPSHRs for guiding the process of human rights risk and impact assessments, the management of private security, and its relationship with public security bodies.

In March 2023, the regional VPSHRs working group resumed activities following the COVID pandemic by defining a work plan with objectives to improve security and respect for human rights in southern Peru. The working group also promotes good practices in implementing the VPSHRs and works to build trust, foster dialogue, and address security and human rights-related challenges between its participants from the government, private sector, civil society, and communities. Antapaccay is an active participant, represented by its security and human rights managers.

The working group has discussed topics such as the relationship between large-scale and artisanal mining, training on the VPSHRs for the PNP, and security in conflict zones.

In September 2024, the working group took part in a site visit to Antapaccay's facilities. The 28 participants visited the water treatment plants and reforestation projects and observed how Antapaccay contributes to local community educational projects.

This was a good opportunity for Antapaccay to demonstrate its commitment to operating responsibly and ethically while strengthening relationships with surrounding communities and stakeholders.

Additional information

Unless otherwise defined within this report, reference is made to the Group Reporting Glossary for the 2024 reporting suite with respect to the terms used herein. The Group Reporting Glossary is available on our website at glencore.com/publications.

Important notice

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. This document does not purport to contain all of the information you may wish to consider.

Cautionary statement regarding forward-looking information

Certain descriptions in this document are 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; expectations regarding financial performance, results of operations and cash flows, climate scenarios; sustainability (including, without limitation, environmental, social and governance) performance-related goals, ambitions, targets, intentions and aspirations; approval of certain projects and consummation and impacts 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 events, 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/or 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 may impact risks and uncertainties include, without limitation: the ability to produce and transport products profitably; demand for our products and commodity prices; development, efficacy and adoption of new or competing technologies; changing or divergent preferences and expectations of our stakeholders; events giving rise to adverse reputational impacts; changes to the assumptions regarding the recoverable value of our tangible and intangible assets; inadequate estimates of resources and reserves; 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; timing, quantum and nature of certain acquisitions and divestments; delays, overruns or other unexpected developments in connection with significant projects; the ability to successfully manage the planning and execution of closure, reclamation and rehabilitation of industrial sites; health, safety, environmental or social performance incidents; labor shortages or workforce disruptions; natural catastrophes or adverse geological conditions, including, without limitation, the physical risks associated with climate change; effects of global pandemics and outbreaks of infectious disease; 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 laws or regulation or changes in the decarbonisation policies and plans of other countries; breaches of Glencore's policy framework, applicable laws or regulations; the availability of sufficient credit and management of liquidity and counterparty risks; changes in economic and financial market conditions generally or in various countries or regions; political or geopolitical uncertainty; and wars, political or civil unrest, acts of terrorism, cyber attacks or sabotage.

Readers, including, without limitation, investors and prospective investors, should review and consider 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 particularly difficult to determine all potential risks and opportunities and disclose these and any potential impacts with precision. 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 or that 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 document discusses in certain instances and the inherent uncertainty in possible policy, market and technological developments in the future.

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Additional information *continued*

Sources

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Information preparation

In preparing this document, Glencore has made certain estimates and assumptions that may affect the information presented. Certain information is derived from management accounts, is unaudited and based on information Glencore has available to it at the time. Figures throughout this document are subject to rounding adjustments. The information presented is subject to change at any time without notice and we do not intend to update this information except as required.

This document contains alternative performance measures which reflect how Glencore's management assesses the performance of the Group, including results that exclude certain items included in our reported results. These alternative performance measures should be considered in addition to, and not as a substitute for, or as superior to, measures of financial performance or position reported in accordance with IFRS. Such measures may not be uniformly defined by all companies, including those in Glencore's industry. Accordingly, the alternative performance measures presented may not be comparable with similarly titled measures disclosed by other companies. Further information can be found in our reporting suite available at [glencore.com/publications](https://www.glencore.com/publications).

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 document.

Other information

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*

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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 over 150,000 employees and contractors and a strong footprint in over 30 countries in both established and emerging regions for natural resources, a global network of more than 50 offices supports our marketing and industrial activities.

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.

Glencore is proud to be a member of the Voluntary Principles on Security and Human Rights and the International Council on Mining and Metals. We are an active participant in the Extractive Industries Transparency Initiative.

We will support the global effort to achieve the goals of the Paris Agreement through our efforts to decarbonise our own operational footprint. We believe that we should take a holistic approach and have considered our

commitment through the lens of our global industrial emissions.

For more information see our 2024-2026 Climate Action Transition Plan, available on our website at glencore.com/publications.

Our sustainability communications

Our annual corporate reporting suite reflects our commitment to transparent disclosure across a broad range of topics:

Material topic	Public disclosures							
	Annual Report	Sustainability Report	Modern Slavery Statement	Payments to Governments Report	Ethics & Compliance Report	VPSHRs Report	Water Microsite	TSF Microsite
Climate Change	●	○	○	○	○	○	○	○
Water	●	●	○	○	○	○	●	○
Land Management	●	●	○	○	○	○	●	●
Biodiversity	●	●	○	○	○	○	○	○
Diversity, Equity & Inclusion	●	○	●	○	○	○	○	○
Social Performance	●	●	●	●	○	●	●	●
Catastrophic Hazards (incl. Tailings Dam Management)	●	●	●	○	○	○	○	●
Occupational Health	●	●	○	○	○	○	○	○
Workforce Safety	●	●	○	○	○	○	○	○
Ethics & Compliance	●	○	○	●	●	○	○	○
Transparency	●	●	●	●	●	●	●	●
Responsible Sourcing	●	○	●	○	○	●	○	○
Human Rights	●	●	●	○	○	●	○	○
Indigenous Peoples	●	●	○	○	○	●	○	○
Just transition (emerging topic)	●	○	○	○	○	○	○	○

● Detailed information available
● High-level information available
○ No information available