

GLENCORE



United Nations Global Compact:

Communication on Progress 2014

UN Global Compact

Communication on Progress 2014

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Chief Executive Officer statement of support



23 June, 2015

A statement of support for the UN Global Compact and its principles

Responsibility is one of Glencore's five fundamental values; we take our responsibilities to our people, to society and to the environment very seriously. We strongly support the United Nations Global Compact's principles on human rights, labour, the environment and anti-corruption.

As one of the world's largest diversified and vertically-integrated producers, processors and marketers of commodities, we are committed to operating transparently and responsibly.

The Compact and its principles are in line with our fundamental values and our Code of Conduct.

We have a system for sustainability and compliance management across our Group, called Glencore Corporate Practice. It consists of three tiers: our values, our Code of Conduct and our Group HSEC and compliance policies, with additional policies pertaining to local risks at the operational level. The essential requirements are defined in our Code of Conduct, which embodies our expectations of our people and our business partners. We report on our performance in our Annual and Sustainability Reports.

This Communication on Progress for 2014 outlines our work to continue integrating the UNGC and its principles into our day to day activities. It references our Annual Report and Sustainability Report for 2014.

Ivan Glasenberg
Chief Executive Officer



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Implementing UNGC principles into strategies and operations

Criterion 1: The COP describes mainstreaming into corporate functions and business units

Best practices	Reference
Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company's sustainability commitments and objectives	<ul style="list-style-type: none"> • <i>Sustainability framework</i> in Sustainability Report 2014 (SR2014) • <i>Sustainable development</i> in Annual Report 2014 (AR2014) • Group HSEC Management Framework
Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy	<ul style="list-style-type: none"> • <i>Sustainability framework</i> in SR2014 • <i>Sustainable development</i> in AR2014 • Group HSEC Management Framework
Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary	<ul style="list-style-type: none"> • Group HSEC Management Framework
Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs	<ul style="list-style-type: none"> • <i>Sustainability framework</i> in SR2014 • <i>Sustainable development</i> in AR2014
Ensure that different corporate functions coordinate closely to maximise performance and avoid unintended negative impacts	<ul style="list-style-type: none"> • <i>Sustainability framework</i> in SR2014
Other established or emerging best practices	<ul style="list-style-type: none"> • <i>Our strategy</i> in SR2014 • <i>Our business model</i> in SR2014 • <i>Focusing on the issues that matter</i> in SR2014 • <i>Our approach: Health & safety</i> in SR2014 • <i>Our approach: Society</i> in SR2014 • <i>Creating value for society</i> in SR2014 • <i>Our approach: Human rights</i> in SR2014 • <i>Our approach: Environment</i> in SR2014 • <i>Water: Environment</i> in SR2014 • <i>Climate change & energy: Environment</i> in SR2014 • <i>Our approach: Product stewardship</i> in SR2014 • Best practice case studies: http://www.glencore.com/public-positions/related-information/case-studies/
Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff	<ul style="list-style-type: none"> • <i>Our commitments</i> in SR2014 • <i>Creating value for Society</i> in SR2014

Criterion 2: The COP describes value chain implementation

Best practices	Reference
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	<ul style="list-style-type: none">• <i>Our business model</i> in SR2014• <i>Principal risks and uncertainties</i> in AR2014• Glencore Code of Conduct
Communicate policies and expectations to suppliers and other relevant business partners	<ul style="list-style-type: none">• <i>Our sustainability strategy</i> in SR2014• <i>Compliance</i> in SR2014• <i>Stakeholder engagement</i> in SR2014• Glencore Code of Conduct
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	<ul style="list-style-type: none">• <i>Sustainability framework</i> in SR2014
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	<ul style="list-style-type: none">• <i>Human rights</i> in SR2014• <i>Society</i> in SR2014• <i>Product stewardship</i> in SR2014
Other established or emerging best practices	<ul style="list-style-type: none">• <i>Our sustainability strategy</i> in SR2014• <i>Creating value for society</i> in SR2014• <i>Looking forward: Human rights</i> in SR2014• <i>Working with our business partners: Human rights</i> in SR2014• <i>Our approach: Environment</i> in SR2014• <i>We help our stakeholders....: Product stewardship</i> in SR2014• <i>Ensuring integrated product management....: Product stewardship</i> in SR2014• <i>Promoting safe and efficient use....: Product stewardship</i> in SR2014
Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff	<ul style="list-style-type: none">• <i>Our commitments</i> in SR2014• <i>Looking forward: Human rights</i> in SR2014• <i>Looking forward....: Product stewardship</i> in SR2014• <i>Creating value for society</i> in SR2014

UN Global Compact principles

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment, and anti-corruption. These take the form of ten principles.

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;

Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Human rights

The first two UNGC principles relate to human rights.

Respect for human rights is a core consideration for Glencore. Our operations have many contacts with the communities in which we work. It is vital that we uphold the human rights of our people and our local communities, including vulnerable groups such as women, children, indigenous people and victims of conflict. This is particularly relevant in regions where our assets require additional security.

Our approach, which is enshrined in our Group Human Rights Policy, is aligned with the *Protect, Respect and Remedy* framework from the UN Guiding Principles on Business and Human Rights, as well as the ILO Core Conventions. Our procedures are aligned with the Voluntary Principles on Security and Human Rights (Voluntary Principles).

Our departmental and operational managers are responsible for ensuring that our people comply with the policy; they are overseen by our Board HSEC Committee. Where applicable, assets are required to conduct a risk assessment for human rights infringements at key phases of its lifecycle. This assessment is fundamental to our approach, but is adapted for the specific circumstances of each region in which we operate. We also require grievance mechanisms that are accessible, accountable and fair, and that enable our stakeholders to raise concerns without fear of recrimination. Finally, we conduct regular human rights training for our workforce. This ranges from focused training on the Voluntary Principles on Security and Human Rights for our security employees and contractors, to general human rights awareness during day-to-day activities for our wider workforce.

Some of the countries where we work have a higher risk of security-related human rights abuses. We expect our people to avoid complicity in human rights abuses and uphold international standards at all of our assets, regardless of location or function.

Information that addresses these principles can be found in:

- Stakeholder engagement: SR2014
- Focusing on the issues that matter: SR2014
- Human rights: SR2014
- Case study: Managing security risks while protecting human rights: SR2014
- Case study: Protecting human rights in a conflict zone: SR2014
- Glencore Code of Conduct
- Glencore Group Human Rights Policy

Labour standards

The next four principles relate to labour standards.

Our people are our greatest asset; our success relies on the ability to attract and retain the best talent at every level. We treat all our people fairly, uphold their rights and reward them competitively, in line with their contribution to our success.

We aim to provide clear, attractive career paths and safe, healthy workplaces that are free of discrimination and harassment. We rigorously enforce our policy of equal opportunity at all levels of the organisation. We uphold the ILO Declaration on Fundamental Principles and Rights at Work.

We aim to employ workforces that reflect the demographics of our host communities, and prohibit discrimination on the basis of race, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, political or other opinion, or any other bias. We do not tolerate any form of racial, sexual or workplace harassment.

We prohibit child, forced, or compulsory labour.

We recognise and uphold the rights of our people to a safe workplace, freedom of association, collective representation, just compensation, job security and development opportunities. This is regardless of their location or role. We are committed to working honestly and openly with labour unions across the Group.

Information that addresses these principles can be found in:

- Stakeholder engagement: SR2014
- Focusing on the issues that matter: SR2014
- Our people: SR2014
- Case study: Industrial relations in South Africa: SR2014
- Glencore Code of Conduct

Environment

The next three principles relate to the environment.

Our operations have direct and indirect impact on the environment. We work to minimise and mitigate any negative impact from our activities and are always looking for ways to improve our performance. We use the precautionary principle in our environmental considerations. Our Group Environmental Policy is aligned with international environmental standards, including ISO 14001.

The Group Environmental Policy requires our operations to undertake detailed risk assessment reviews, and to identify appropriate mitigation actions. Based on these reviews, our assets maintain environmental management plans. These focus on maintaining the

integrity of our facilities; the efficient use of resources; preserving protected areas and biodiversity; and ensuring closure planning and rehabilitation. Assets update these plans at each stage of their lifecycles, and incorporate them into overall risk registers and management plans.

When the opportunity arises, we disseminate best available data and promote practices and experiences in biodiversity assessment. We support the development and implementation of best available technology, inclusive and transparent procedures for integrated approaches to land use planning, biodiversity, conservation and mining. We have joined several global initiatives researching precision agriculture technologies and other agronomic improvements.

We are committed to playing a constructive role in the development of public policy for climate change and energy; an important part of this is engaging with stakeholders and supporting constructive and informed public debate. We actively support the development of low emission technologies, including highly efficient low-emission coal power generation technologies. We have financially supported development of these technologies.

Information that addresses these principles can be found in:

- Focusing on the issues that matter: SR2014
- Environment: SR2014
- Case study: Innovative water treatment: SR2014
- Case study: Replacing diesel power with wind energy: SR2014
- Glencore Code of Conduct
- Glencore Group Environmental Policy

Anti-corruption

The final principle relates to corruption.

Our primary objective is to ensure that we maintain a culture of ethical behaviour and compliance throughout the Group. Our Global Anti-Corruption Policy includes our clear position on bribery and corruption, which is that offering, paying, authorising, soliciting or accepting bribes is unacceptable.

We will not knowingly assist any third party in breaching the law, or participate in any criminal, fraudulent or corrupt practice in any country. We seek to prevent such misconduct through training programmes and strong leadership that is underpinned by internal policies, procedures and controls.

If one of our people encounters a situation in which our policies appear to be breached, the individual must raise this promptly with a supervisor or manager, local compliance co-ordinator, or a member of the business ethics committee.

- Compliance: SR2014
- Glencore Code of Conduct
- Glencore Global Anti-Corruption Policy

Robust human rights management policies & procedures

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses.

Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights

Best practices	Reference
Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1)	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014 • Glencore Group Human Rights Policy
Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)	<ul style="list-style-type: none"> • Glencore Group Human Rights Policy
Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)	<ul style="list-style-type: none"> • Glencore Group Human Rights Policy • Glencore Code of Conduct
Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)	<ul style="list-style-type: none"> • Glencore Group Human Rights Policy • Glencore Code of Conduct

Criterion 4: The COP describes effective management systems to integrate the human rights principles

Best practices	Reference
Process to ensure that internationally recognised human rights are respected	<ul style="list-style-type: none"> • <i>Sustainability framework</i> in SR2014 • <i>Sustainable development</i> in AR2014 • Group HSEC Management Framework • <i>Human rights</i> in SR2014 • <i>Our approach: society</i> in SR2014 • <i>Compliance</i> in SR2014 • Glencore Code of Conduct
On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3)	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014
Internal awareness-raising and training on human rights for management and employees	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014 • <i>Security and human rights: Human rights</i> in SR2014
Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)	<ul style="list-style-type: none"> • <i>Respecting the rights of communities: Human rights</i> in SR2014 • <i>Grievance mechanisms: Human rights</i> in SR2014

	<ul style="list-style-type: none"> • <i>Managing our impact: Society</i> in SR2014
Allocation of responsibilities and accountability for addressing human rights impacts	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014 • Group HSEC Management Framework
Internal decision-making, budget and oversight for effective responses to human rights impacts	<ul style="list-style-type: none"> • Glencore Group Human Rights Policy
Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE3 + ARE 4)	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014 • <i>Grievance mechanisms: Human rights</i> in SR2014 • Glencore Group Human Rights Policy
Process and programmes in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

Best practices	Reference
System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)	<ul style="list-style-type: none"> • <i>Our commitments</i> in SR2014 • Asset and Group-level assurance programmes • Annual report on progress submitted to the Voluntary Principles
Monitoring drawn from internal and external feedback, including affected stakeholders	<ul style="list-style-type: none"> • <i>Grievance mechanisms: Human rights</i> in SR2014 • <i>Respecting the rights of communities: Human rights</i> in SR2014 • <i>Managing our impact: Society</i> in SR2014
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> • <i>Our approach: Human rights</i> in SR2014 • <i>Sustainability framework</i> in SR2014
Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)	<ul style="list-style-type: none"> • <i>Respecting the rights of communities: Human rights</i> in SR2014 • <i>Grievance mechanisms: Human rights</i> in SR2014 • <i>Managing our impact: Society</i> in SR2014
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 +	<ul style="list-style-type: none"> • <i>Respecting the rights of communities: Human rights</i> in SR2014 • <i>Grievance mechanisms: Human</i>

ARE4)	<p><i>rights</i> in SR2014</p> <ul style="list-style-type: none"> • <i>Managing our impact: Society</i> in SR2014 • Glencore Group Human Rights Policy • Glencore Group Community and Stakeholder Engagement Policy • Glencore Code of Conduct
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Robust labour management policies & procedures

Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour

Best practices	Reference
Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	<ul style="list-style-type: none"> • <i>Our approach: Our people</i> in SR2014 • <i>International standards</i> in SR2014
Reflection on the relevance of the labour principles for the company	<ul style="list-style-type: none"> • <i>Our approach: Our people</i> in SR2014 • <i>Stakeholder engagement</i> in SR2014 • Glencore Code of Conduct
Written company policy to obey national labour law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).	<ul style="list-style-type: none"> • Glencore Code of Conduct
Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> • Glencore Code of Conduct • <i>Working with our business partners....: Human Rights</i> in SR2014 • <i>Our sustainability strategy</i> in SR2014
Participation and leadership by employers' organisations (international and national) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).	<ul style="list-style-type: none"> • <i>Case study: Industrial relations in South Africa</i> in SR2014
Structural engagement with a global union, possibly via a Global Framework Agreement	<ul style="list-style-type: none"> • <i>Industrial relations: Our people</i> in SR2014 • <i>Case study: Industrial relations in South Africa</i> in SR2014

Criterion 7: The COP describes effective management systems to integrate the labour principles

Best practices	Reference
Risk and impact assessments in the area of labour	<ul style="list-style-type: none"> • <i>Career development: Our people</i> in SR2014 • <i>Turnover: Our people</i> in SR2014 • <i>Retention: Our people</i> in SR2014 • <i>Principle risks & uncertainties</i> in AR2014
Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff	<ul style="list-style-type: none"> • <i>Local employment: Our people</i> in SR2014 • <i>Our commitments</i> in SR2014
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> • <i>Our approach: Our people</i> in SR2014 • Group HSEC Management Framework
Internal awareness-raising and training on the labour principles for management and employees	<ul style="list-style-type: none"> • Glencore Code of Conduct • <i>Compliance</i> in SR2014
Active engagement with suppliers to address labour-related challenges	<ul style="list-style-type: none"> • <i>Case study: Local employment in South America</i> in SR2014 • <i>We are committed to local procurement: Society</i> in SR2014
Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in line with the representative organisation of workers	<ul style="list-style-type: none"> • <i>Grievance mechanisms: Human rights</i> in SR2014 • <i>Compliance</i> in SR2014 • Glencore Group Human Rights Policy • Glencore Code of Conduct
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<ul style="list-style-type: none"> • <i>Industrial relations: Our people</i> in SR2014 • <i>Case study: Industrial relations in South Africa</i> in SR2014

Criterion 8: The COP describes monitoring and evaluation mechanisms of labour principles integration

Best practices	Reference
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> • <i>Our commitments</i> in SR2014? • <i>Sustainability framework</i> in SR2014
Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards	N/A

Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices	<ul style="list-style-type: none"> • <i>Case study: Local employment in South America</i> in SR2014
Outcomes of integration of the Labour principles	<ul style="list-style-type: none"> • <i>Our people</i> in SR2014 • <i>Our commitments</i> in SR2014 • <i>Databook</i> in SR2014
Dialogues with the representative organisation of workers to regularly review progress made and jointly identify priorities for the future	<ul style="list-style-type: none"> • <i>Engaging with our people: Our People: in SR2014</i>

Robust environmental management policies & procedures

Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship

Best practices	Reference
Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development)	<ul style="list-style-type: none"> • All our policies are aligned with relevant international standards etc.
Reflection on the relevance of environmental stewardship for the company	<ul style="list-style-type: none"> • <i>Our approach: Environment</i> in SR2014 • <i>Stakeholder engagement</i> in SR2014 • <i>Sustainable development</i> in AR2014 • <i>Focusing on the issues that matter</i> in SR2014
Written company policy on environmental stewardship	<ul style="list-style-type: none"> • Glencore Group Environmental Policy
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> • <i>Our approach: Environment</i> in SR2014 • Glencore Group Environmental Policy • Glencore Code of Conduct
Specific commitments and goals for specified years	<ul style="list-style-type: none"> • <i>Our commitments</i> in SR2014

Criterion 10: The COP describes effective management systems to integrate the environmental principles

Best practices	Reference
Environmental risk and impact assessments	<ul style="list-style-type: none"> • <i>Our approach; Environment</i> in SR2014 • <i>Principle risks & uncertainties</i> in AR2014
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<ul style="list-style-type: none"> • <i>Our approach: Product stewardship</i> in SR2014
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> • <i>Our approach: Environment</i> in SR2014

	<ul style="list-style-type: none"> • Group HSEC Management Framework • Glencore Group Environmental Policy
Internal awareness-raising and training on environmental stewardship for management and employees	<ul style="list-style-type: none"> • <i>Environment</i> in SR2014 • Glencore Group Environmental Policy
Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts	<ul style="list-style-type: none"> • <i>Respecting the rights of communities: Human rights</i> in SR2014 • <i>Grievance mechanisms: Human rights</i> in SR2014 • <i>Managing our impact: Society</i> in SR2014 • Glencore Group Human Rights Policy • Glencore Group Community and Stakeholder Engagement Policy

Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

Best practices	Reference
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> • <i>Our approach: Environment</i> in SR2014 • Glencore Group Environmental Policy • <i>Our commitments</i> in SR2014 • <i>Sustainability framework</i> in SR2014
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> • <i>Our approach: Environment</i> in SR2014 • Glencore Group Environmental Policy • <i>Corporate Governance report</i>, AR2014
Process to deal with incidents	<ul style="list-style-type: none"> • Glencore Group Catastrophic and Fatal Hazard Management Policy • Glencore Group Emergency Response and Crisis Management Policy • <i>Environmental incidents and fines: Environment</i> in SR2014
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	<ul style="list-style-type: none"> • <i>Our approach: Environment</i> in SR2014 • Glencore Code of Conduct
Outcomes of integration of the environmental principles	<ul style="list-style-type: none"> • <i>Environment</i> in SR2014 • <i>Our commitments</i> in SR2014 • <i>Databook</i> in SR2014

Robust anti-corruption management policies & procedures

Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

Best practices	Reference
Publicly stated formal policy of zero-tolerance of corruption (D1)	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014 • <i>Chief Executive's review</i> in SR2014 • Glencore Global Anti-Corruption Policy • Code of Conduct
Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014 • Glencore Global Anti-Corruption Policy
Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy • <i>Compliance</i> in SR2014
Detailed policies for high-risk areas of corruption (D4)	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy
Policy on anti-corruption regarding business partners (D5)	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy • Code of Conduct • <i>Compliance</i> in SR2014

Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle

Best practices	Reference
Support by the organization's leadership for anti-corruption (B4)	<ul style="list-style-type: none"> • <i>Chief Executive's review</i> in SR2014 • <i>Compliance</i> in SR2014
Carrying out risk assessment of potential areas of corruption	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014 • Glencore Global Anti-Corruption Policy
Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014
Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	<ul style="list-style-type: none"> • <i>Sustainability framework</i> in SR2014 • <i>Corporate Governance report</i>, AR2014
Actions taken to encourage business partners to implement anti-corruption commitments (D6)	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014 • Glencore Global Anti-Corruption Policy • Glencore Code of Conduct
Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)	<ul style="list-style-type: none"> • <i>Chief Executive's review</i> in SR2014 • <i>Corporate Governance report</i>, AR2014

Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)	<ul style="list-style-type: none"> • Code of Conduct • <i>Compliance</i> in SR2014 • Glencore Global Anti-Corruption Policy
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Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

Best practices	Reference
Leadership review of monitoring and improvement results (D12)	<ul style="list-style-type: none"> • <i>Corporate Governance report</i>, AR2014
Process to deal with incidents (D13)	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014
Use of independent external assurance of anti-corruption programmes	N/A
Outcomes of integration of the anti-corruption principle	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014 • <i>Databook</i> in SR2014
Internal accounting and auditing procedures related to anticorruption	<ul style="list-style-type: none"> • <i>Compliance</i> in SR2014

Taking action in support of broader UN goals and issues

Criterion 15: The COP describes core business contributions to UN goals and issues

Best practices	Reference
Align core business strategy with one or more relevant UN goals/issues	<ul style="list-style-type: none"> • <i>Chairman's statement</i> in SR2014 • <i>Our commitments</i> in SR2014 • <i>International standards</i> in SR2014 • <i>Our approach: Human rights</i> in SR2014 • <i>Grievance mechanisms: Human rights</i> in SR2014 • <i>Looking forward: Human rights</i> in SR2014 • Glencore Code of Conduct
Develop relevant products and services or design business models that contribute to UN goals/issues	<ul style="list-style-type: none"> • Glencore Group Human Rights Policy • <i>Focusing on the issues that matter</i> in SR2014 • <i>International standards</i> in SR2014 • <i>The ICMM application process</i> in SR2014
Adopt and modify operating procedures to maximise contribution to UN goals/issues	<ul style="list-style-type: none"> • <i>Case study: Managing security risks while protecting human rights</i>: SR2014 • <i>Databook</i> (GRI indicator HR2): SR2014

Criterion 16: The COP describes strategic social investments and philanthropy

Best practices	Reference
Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy	<ul style="list-style-type: none"> • <i>We contribute to community development: Society</i> in SR2014 • <i>Our commitments</i> in SR2014
Coordinate efforts with other organisations and initiatives to amplify and not negate or unnecessarily duplicate the efforts of other contributors	<ul style="list-style-type: none"> • <i>Chief Executives review: Working with NGOs</i> in SR2014 • <i>Working with communities, NGOs....:Society</i> in SR2014 • <i>Case study: Piloting our social value creation model</i> in SR2014
Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups	<ul style="list-style-type: none"> • <i>Our approach: Society</i> in SR2014 • <i>We contribute to community development: Society</i> in SR2014

Criterion 17: The COP describes advocacy and public policy engagement

Best practices	Reference
Publicly advocate the importance of action in relation to one or more UN goals/issues	<ul style="list-style-type: none"> • <i>Chief Executive's review</i> in SR2014 • <i>Chairman's statement</i> in SR2014
Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues	Most recently, Glencore Chairman Tony Hayward spoke at the Business & Climate Summit in Paris in May 2015, which focused on actions and strategies towards climate change.

Criterion 18: The COP describes partnerships and collective action

Best practices	Reference
Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy	<ul style="list-style-type: none"> • <i>Chief Executives review: Working with NGOs</i> in SR2014 • <i>Working with communities, NGOs....:Society</i> in SR2014 • <i>Case study: Piloting our social value creation model</i> in SR2014
Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain	<ul style="list-style-type: none"> • <i>The ICMM application process</i> in SR2014 • <i>Determining materiality, North America Regional Report</i> in SR2014 • <i>Promoting the safe and efficient use of</i> • <i>our products: Product stewardship</i> in SR2014 • <i>Engaging with regulatory developments: Product stewardship</i> in SR2014 • http://www.glencore.com/public-

Corporate sustainability governance and leadership

Criterion 19: The COP describes CEO commitment and leadership

Best practices	Reference
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	<ul style="list-style-type: none"> • <i>Chief Executive's review</i> in SR2014
CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	<ul style="list-style-type: none"> • <i>Chief Executive's review</i> in SR2014 • <i>The ICMM application process</i> in SR2014
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	<ul style="list-style-type: none"> • <i>Chief Executive's review</i> in SR2014 • <i>Sustainability framework</i> in SR2014
Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team	<ul style="list-style-type: none"> • Our CEO and executive management team have substantial shareholdings in Glencore, closely aligning their interests with the prospects of the company. As a company, we recognise that we will only deliver our full value through the integration of sustainability throughout our business.

Criterion 20: The COP describes Board adoption and oversight

Best practices	Reference
Board of Directors assumes responsibility and oversight for long-term corporate sustainability strategy and performance	<i>Sustainability Framework</i> in SR2014
Board establishes a committee or assigns an individual board member with responsibility for corporate sustainability	<i>Sustainability Framework</i> in SR2014
Board approves formal reporting on corporate sustainability	<i>Sustainability Framework</i> in SR2014

Criterion 21: The COP describes stakeholder engagement

Best practices	Reference
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Publicly recognise responsibility for the company's impacts on internal and external stakeholders	<ul style="list-style-type: none"> • <i>Stakeholder engagement</i> in SR2014
Define sustainability strategies, goals and policies in consultation with key stakeholders	<ul style="list-style-type: none"> • <i>Stakeholder engagement</i> in SR2014 • <i>Focusing on the issues that matter</i> in SR2014
Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance	<ul style="list-style-type: none"> • <i>Respecting the rights of communities: Human rights</i> in SR2014
Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect 'whistle-blowers'	<ul style="list-style-type: none"> • <i>Stakeholder engagement</i> in SR2014 • <i>Engaging with our people: Our people</i> in SR2014 • <i>Our approach: Society</i> in SR2014 • Glencore Code of Conduct • Glencore Group Community and Stakeholder Engagement Policy

Business and Peace

Criterion A: Policies and practices related to the company's core business operations in high-risk or conflict-affected areas

Best practices	Reference
Information on how policies, strategies and operating practices have been adapted to the specific high-risk/conflict context based on due diligence	<ul style="list-style-type: none"> • <i>Human Rights</i> in SR2014 • <i>Protecting human rights in a conflict zone</i> in SR 2014
Adherence to best practices even where national law sets a lower standard, including in the management of security services	<ul style="list-style-type: none"> • <i>Human Rights: security and human rights</i> in SR2014 • <i>Managing security risks while protecting human rights</i> in SR2014
Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices	<ul style="list-style-type: none"> • <i>Human Rights: artisanal mining</i> in SR2014 • Glencore Code of Conduct

Criterion B: Policies and practices related to the company's government relations in high-risk or conflict-affected areas

Best practices	Reference
Measures undertaken to avoid complicity in human rights violations by government actors	<ul style="list-style-type: none"> • <i>Human Rights</i> in SR2014 • <i>Managing security risks while protecting human rights</i> in SR 2014
Management practices aimed at preventing corrupt relationships with government officials	<ul style="list-style-type: none"> • Glencore Global Anti-Corruption Policy

Criterion C: Local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict-affected areas

Best practices	Reference
Stakeholder engagement mechanisms across company and contractor operations	<ul style="list-style-type: none"> • <i>Stakeholder engagement</i> in SR2014 • <i>Regional reports: South America</i> in SR 2014
Approaches to stakeholder engagement involving civil society, international organisations, etc.	<ul style="list-style-type: none"> • <i>Highlights</i> in SR2014
Actions towards constrictive and peaceful company-community engagement	<ul style="list-style-type: none"> • <i>Resettlement activity in Colombia</i> in SR2014
Sustainable social investment projects	<ul style="list-style-type: none"> • <i>Regional reports: Africa</i> in SR2014