

# GLENCORE

## **UNITED NATIONS GLOBAL COMPACT**

**Communication on progress in 2015**

# UN Global Compact

## Communication on Progress 2015/6

### Contents

CEO statement of support .....	3
Implementing UNGC principles into strategies and operations .....	4
UN Global Compact principles .....	6
Human rights.....	6
Labour standards .....	7
Environment .....	7
Anti-corruption .....	8
Robust human rights management policies & procedures .....	9
Robust labour management policies & procedures .....	10
Robust environmental management policies & procedures .....	12
Robust anti-corruption management policies & procedures .....	14
Taking action in support of broader UN goals and issues.....	15
Corporate sustainability governance and leadership .....	16

## CEO statement of support



3 July 2016

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

As Chief Executive Officer of the Glencore Group, I'm proud to state our continuing support for the United Nations Global Compact's principles on human rights, labour, the environment and anti-corruption.

Responsibility is one of Glencore's five fundamental values; we take our responsibilities to our people, to society and to the environment very seriously. As one of the largest diversified and vertically-integrated producers, processors and marketers of commodities in the world, our commitment to operating transparently and responsibly is extremely important.

Our Group's sustainability management system is called Glencore Corporate Practice. It consists of three tiers: our five fundamental values, our Code of Conduct and our Group HSEC policies, with additional policies specific to individual operations. These are aligned with the Global Compact and its principles, particularly the essential underlying requirements for working within the Group. These are defined in our Code of Conduct, which states our expectations of them and of our business partners.

In 2015 we revised our Group sustainability strategy, considering our aims against four core pillars: health; safety; environment; and community & human rights. In addition we identified three further focus areas: our people; governance; and product stewardship. The revised strategy, which we will review each year, has clearly defined imperatives, objectives, priority areas and targets. Our business division and assets have aligned their annual HSEC plans to the strategy. We believe it is a robust basis for ensuring we maintain an effective and appropriate approach to sustainability.

This Communication on Progress in 2015 demonstrates our continuing progress on integrating the UNGC and its principles into everything we do. It references our Annual Report and Sustainability Report for 2015, as well as *Climate change considerations for our business*, our recent publication on the implications of climate change for our portfolio.

**Ivan Glasenberg**  
Chief Executive Officer

A handwritten signature in black ink, appearing to read "I. Glasenberg", written over the Glencore logo.  
**GLENCORE**  
INTERNATIONAL AG

---

Baarermattstrasse 3 · P.O. Box 1363 · CH-6341 Baar · Switzerland  
Telephone +41 41 709 20 00 · Telefax +41 41 709 30 00

---

## Implementing UNGC principles into strategies and operations

<b>Criterion 1:</b> The COP describes mainstreaming into corporate functions and business units	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Our sustainability approach</i> in Sustainability Report 2015 (SR2015)</li> <li>• <i>Sustainable development</i> in Annual Report 2015 (AR2015)</li> <li>• Group HSEC Management Framework</li> </ul>
Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy	<ul style="list-style-type: none"> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>Sustainable development</i> in AR2015</li> <li>• <i>Our 2015 sustainability strategy</i> in SR2055</li> <li>• Group HSEC Management Framework</li> </ul>
Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary	<ul style="list-style-type: none"> <li>• Group HSEC Management Framework</li> </ul>
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"> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>Our 2015 sustainability strategy</i> in SR2055</li> <li>• <i>Sustainable development</i> in AR2015</li> </ul>
Ensure that different corporate functions coordinate closely to maximise performance and avoid unintended negative impacts	<ul style="list-style-type: none"> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>Our 2015 sustainability strategy</i> in SR2055</li> </ul>
Other established or emerging best practices	<ul style="list-style-type: none"> <li>• <i>Our strategy</i> in SR2015</li> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> <li>• <i>Our people: Safety</i> in SR2015</li> <li>• <i>Our people: Health</i> SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Environment: Water</i> in SR2015</li> <li>• <i>Environment: Land management</i> in SR2015</li> <li>• <i>Australia: Mates in Mining</i> in SR2015</li> <li>• <i>Australia: Environment</i> in SR2015</li> <li>• <i>North America: The Raglan Agreement</i> in SR2015</li> </ul>
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"> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Our 2015 sustainability strategy</i> in SR2015</li> </ul>

<b>Criterion 2:</b> The COP describes value chain implementation	
<b>Best practices</b>	<b>Reference</b>
Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts	<ul style="list-style-type: none"> <li>• <i>Our business model</i> in SR2015</li> <li>• <i>Principal risks and uncertainties</i> in AR2015</li> <li>• Glencore Code of Conduct</li> </ul>
Communicate policies and expectations to suppliers and other relevant business partners	<ul style="list-style-type: none"> <li>• <i>Who we are</i> in SR2015</li> <li>• <i>Compliance</i> in SR2015</li> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Environment: Environmental management</i> in</li> </ul>

	SR2015 <ul style="list-style-type: none"> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Glencore Code of Conduct</li> </ul>
Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence	<ul style="list-style-type: none"> <li>• <i>Our sustainability approach</i> in SR2015</li> </ul>
Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners	<ul style="list-style-type: none"> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> </ul>
Other established or emerging best practices	<ul style="list-style-type: none"> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> <li>• <i>Our people: Safety</i> in SR201</li> <li>• <i>Our people: Health</i> SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Environment: Land management</i> in SR2015</li> </ul>
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"> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>

## 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.

Glencore prioritises respect for human rights everywhere that we operate. Our assets have many contacts with the communities in which we work. 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. We pay particular attention to how human rights are handled in regions where our assets require additional security.

Our Group human rights policy sets out our approach to this vital topic. The policy is aligned with the *Protect, Respect and Remedy* framework from the UN *Guiding Principles on Business and Human Rights*, and with the ILO's *Core Conventions*. In addition, our security procedures are aligned with the Voluntary Principles on Security and Human Rights (Voluntary Principles).

Day-to-day responsibility for ensuring that our people comply with the policy lies with our departmental and operational managers; they are overseen by our Board HSEC Committee. Risk assessment is fundamental to our Group approach: we require each asset to conduct a risk assessment for human rights infringements at key phases of its lifecycle. Assessments are adapted for the specific circumstances of each operational region. Our assets must also run grievance mechanisms that are accessible, accountable and fair, which let our stakeholders raise concerns without fear of recrimination. Assets also conduct regular human rights training for their workforce. This covers general human rights awareness during day-to-day activities for our wider workforce, as well as focused Voluntary Principles training for our security employees and contractors.

Some of our host countries 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:

- *What we report on* in SR2015
- *Society: Human rights* in SR2015

- Case study: Working with the Voluntary Principles in the DRC: SR2015
- 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. We treat all our people fairly, uphold their rights and reward them competitively, in line with their contribution to our success. We believe that it is vital to our business to attract and retain the best people at every level.

All our operations strive to provide clear, attractive career paths and safe, healthy workplaces without discrimination or harassment. We rigorously enforce our equal opportunity policy at every level of the Group. We uphold the ILO Declaration on Fundamental Principles and Rights at Work.

Within all our assets' workforces our intention is to reflect the demographics of our host communities; we 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, whatever their location or role, to a safe workplace, freedom of association, collective representation, just compensation, job security and development opportunities. We are committed to working honestly and openly with labour unions across the Group.

Information that addresses these principles can be found in:

- *What we report on* in SR2015
- *Our people: workforce* in SR2015
- *Africa: Our people: workforce* in SR2015
- *South Africa: Retrenchment* in SR2015
- *Australia: Our people: workforce* in SR2015
- *North America: Supporting aboriginal people in the mining sector* in SR2015
- *Rest of the World: Working with the community on redundancies* in SR2015
- Glencore Code of Conduct

## Environment

The next three principles relate to the environment.

We work to minimise and mitigate any negative impact from our operations. These may be direct or indirect. We continually work to improve our performance in this regard. Our Group Environmental Policy is aligned with international environmental standards, including ISO 14001, and we use the precautionary principle in our decision-making processes.

Our Group Environmental Policy requires our assets to undertake detailed risk assessment reviews, and identify appropriate mitigation action where necessary. Our assets maintain environmental management plans based on these reviews. The plans 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.

We disseminate scientific data and promote good biodiversity assessment practice and experiences whenever possible. We support the development and implementation of scientifically sound, inclusive and transparent approaches to integrated land use planning, biodiversity, conservation and mining. We have joined several global initiatives that are involved in precision agriculture technologies and other agronomic improvements.

We believe that we can play a constructive role in the development of public policy on climate change and energy. We wish to support constructive and informed public debate and value our engagement with all stakeholders. We actively support the development of low-emission technologies, including high-efficiency low-emission (HELE) coal power generation technologies. We have financially supported development of these technologies, including the Callide Oxyfuel Project in Australia.

Information that addresses these principles can be found in:

- *What we report on* in SR2015
- *Environment* in SR2015
- *South Africa: Environment* in SR2015
- *Australia: Environment* in SR2015
- *North America: Environment* in SR2015
- *South America: Environment* in SR2015
- *Rest of the World: Environment* in SR2015
- 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, rather than achieving the minimum required by law. 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: SR2015
- 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.

<b>Criterion 3:</b> The COP describes robust commitments, strategies or policies in the area of human rights	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Chief Executive's review</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Glencore Group Human Rights Policy</li> </ul>
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"> <li>• Glencore Group Human Rights Policy</li> </ul>
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"> <li>• Glencore Group Human Rights Policy</li> <li>• Glencore Code of Conduct</li> </ul>
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"> <li>• Glencore Group Human Rights Policy</li> <li>• Glencore Code of Conduct</li> </ul>

<b>Criterion 4:</b> The COP describes effective management systems to integrate the human rights principles	
<b>Best practices</b>	<b>Reference</b>
Process to ensure that internationally recognised human rights are respected	<ul style="list-style-type: none"> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>Sustainable development</i> in AR2015</li> <li>• Group HSEC Management Framework</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Code of Conduct</li> </ul>
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"> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>
Internal awareness-raising and training on human rights for management and employees	<ul style="list-style-type: none"> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>
Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)	<ul style="list-style-type: none"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>
Allocation of responsibilities and accountability for addressing human rights impacts	<ul style="list-style-type: none"> <li>• <i>Our 2015 sustainability strategy</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Group HSEC Management Framework</li> </ul>
Internal decision-making, budget and oversight for effective responses to human rights impacts	<ul style="list-style-type: none"> <li>• Glencore Group Human Rights Policy</li> </ul>

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"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Glencore Group Human Rights Policy</li> </ul>
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"> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Africa: Working with the Voluntary Principles in the DRC</i> in SR2015</li> </ul>

<b>Criterion 5:</b> The COP describes effective monitoring and evaluation mechanisms of human rights integration	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• Asset and Group-level assurance programmes</li> <li>• Annual report on progress submitted to the Voluntary Principles</li> </ul>
Monitoring drawn from internal and external feedback, including affected stakeholders	<ul style="list-style-type: none"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>
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"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> </ul>
Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 + ARE4)	<ul style="list-style-type: none"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Glencore Group Human Rights Policy</li> <li>• Glencore Group Community and Stakeholder Engagement Policy</li> <li>• Glencore Code of Conduct</li> </ul>

## Robust labour management policies & procedures

**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.

<b>Criterion 6:</b> The COP describes robust commitments, strategies or policies in the area of labour	
<b>Best practices</b>	<b>Reference</b>
Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies	<ul style="list-style-type: none"> <li>• <i>Our people: workforce</i> in SR2015</li> <li>• <i>External commitments</i> in SR2015</li> </ul>
Reflection on the relevance of the labour principles for the company	<ul style="list-style-type: none"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Our people: workforce</i> in SR2015</li> <li>• Glencore Code of Conduct</li> </ul>

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"> <li>• Glencore Code of Conduct</li> </ul>
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"> <li>• Glencore Code of Conduct</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> <li>• <i>Society: Human Rights</i> in SR2015</li> </ul>
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).	N/A
Structural engagement with a global union, possibly via a Global Framework Agreement	N/A

<b>Criterion 7: The COP describes effective management systems to integrate the labour principles</b>	
<b>Best practices</b>	<b>Reference</b>
Risk and impact assessments in the area of labour	<ul style="list-style-type: none"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Our people: workforce</i> in SR2015</li> <li>• <i>Principal risks &amp; uncertainties</i> in AR2015</li> </ul>
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"> <li>• <i>Measuring our performance</i> in SR2105</li> <li>• <i>Local employment: Our people</i> in SR2015</li> </ul>
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> <li>• <i>Our people: Workforce</i> in SR2015</li> <li>• Group HSEC Management Framework</li> </ul>
Internal awareness-raising and training on the labour principles for management and employees	<ul style="list-style-type: none"> <li>• Glencore Code of Conduct</li> <li>• <i>Compliance</i> in SR2015</li> </ul>
Active engagement with suppliers to address labour-related challenges	<ul style="list-style-type: none"> <li>• <i>Society: Creating value for society</i> in SR2015</li> <li>• <i>Australia: Fostering positive relationship with our growers</i> in SR2015</li> </ul>
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"> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Group Human Rights Policy</li> <li>• Glencore Code of Conduct</li> </ul>
Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards	<ul style="list-style-type: none"> <li>• <i>Our people: Workforce</i> in SR2015</li> </ul>

<b>Criterion 8:</b> The COP describes monitoring and evaluation mechanisms of labour principles integration	
<b>Best practices</b>	<b>Reference</b>
System to track and measure performance based on standardised performance metrics	<ul style="list-style-type: none"> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Our 2015 sustainability strategy</i> in SR2015</li> </ul>
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"> <li>• <i>Society: Creating value for society</i> in SR2015</li> </ul>
Outcomes of integration of the Labour principles	<ul style="list-style-type: none"> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Our people: Workforce</i> in SR2015</li> <li>• <i>Databook</i> published with SR2015</li> </ul>
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"> <li>• <i>Our people: Workforce</i> in SR2015</li> <li>• <i>Africa: Our people: workforce</i> in SR2015</li> <li>• <i>South Africa: Retrenchment</i> in SR2015</li> <li>• <i>Australia: Our people: workforce</i> in SR2015</li> </ul>

## Robust environmental management policies & procedures

**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.

<b>Criterion 9:</b> The COP describes robust commitments, strategies or policies in the area of environmental stewardship	
<b>Best practices</b>	<b>Reference</b>
Reference to relevant international conventions and other international instruments (eg Rio Declaration on Environment and Development)	<ul style="list-style-type: none"> <li>• All our policies are aligned with relevant international standards and other best practice.</li> <li>• <i>Chairman's statement: Building for the future</i> in SR2015</li> <li>• <i>Chief Executive's review: Climate change</i> in SR2015</li> <li>• <i>Governance: Climate change</i> in SR2015</li> </ul>
Reflection on the relevance of environmental stewardship for the company	<ul style="list-style-type: none"> <li>• <i>Environment: Environmental management</i> in SR2015</li> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Sustainable development</i> in AR2015</li> </ul>
Written company policy on environmental stewardship	<ul style="list-style-type: none"> <li>• Glencore Group Environmental Policy</li> </ul>
Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners	<ul style="list-style-type: none"> <li>• <i>Environment</i> in SR2015</li> <li>• Glencore Group Environmental Policy</li> <li>• Glencore Code of Conduct</li> </ul>

Specific commitments and goals for specified years	<ul style="list-style-type: none"> <li>• <i>Measuring our performance</i> in SR2015</li> </ul>
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<ul style="list-style-type: none"> <li>• <i>Governance: Product stewardship</i> in SR2015</li> </ul>
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> <li>• Glencore Group Environmental Policy</li> <li>• Group HSEC Management Framework</li> </ul>
Internal awareness-raising and training on environmental stewardship for management and employees	<ul style="list-style-type: none"> <li>• Glencore Group Environmental Policy</li> <li>• <i>Environment: Environmental management</i> in SR2015</li> <li>• <i>Environment: Land management</i> in SR2015</li> </ul>
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"> <li>• Glencore Code of Conduct</li> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Compliance</i> in SR2015</li> </ul>

**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"> <li>• <i>Environment</i> in SR2015</li> <li>• <i>Governance: Climate change</i> in SR2015</li> <li>• <i>Principle risks &amp; uncertainties</i> in AR2015</li> </ul>
Assessments of lifecycle impact of products, ensuring environmentally sound management policies	<ul style="list-style-type: none"> <li>• <i>Governance: Product stewardship</i> in SR2015</li> </ul>
Allocation of responsibilities and accountability within the organisation	<ul style="list-style-type: none"> <li>• <i>Our 2015 sustainability strategy</i> in SR2015</li> <li>• <i>Environment</i> in SR2015</li> <li>• Group HSEC Management Framework</li> <li>• Glencore Group Environmental Policy</li> </ul>
Internal awareness-raising and training on environmental stewardship for management and employees	<ul style="list-style-type: none"> <li>• <i>Environment</i> in SR2015</li> <li>• Glencore Group Environmental Policy</li> </ul>
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"> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Glencore Group Human Rights Policy</li> <li>• Glencore Group Community and Stakeholder Engagement Policy</li> </ul>

**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"> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>Environment</i> in SR2015</li> <li>• Glencore Group Environmental Policy</li> </ul>
Leadership review of monitoring and improvement results	<ul style="list-style-type: none"> <li>• <i>Environment</i> in SR2015</li> <li>• Glencore Group Environmental Policy</li> <li>• <i>Corporate Governance report</i>, AR2015</li> </ul>

Process to deal with incidents	<ul style="list-style-type: none"> <li>• Glencore Group Catastrophic and Fatal Hazard Management Policy</li> <li>• Glencore Group Emergency Response and Crisis Management Policy</li> <li>• <i>Environment: Environmental management</i> in SR2015</li> </ul>
Audits or other steps to monitor and improve the environmental performance of companies in the supply chain	<ul style="list-style-type: none"> <li>• <i>Environment: Environmental management</i> in SR2015</li> <li>• Glencore Code of Conduct</li> </ul>
Outcomes of integration of the environmental principles	<ul style="list-style-type: none"> <li>• <i>Environment</i> in SR2015</li> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Databook</i> published with SR2015</li> </ul>

## Robust anti-corruption management policies & procedures

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

<b>Criterion 12:</b> The COP describes robust commitments, strategies or policies in the area of anti-corruption	
<b>Best practices</b>	<b>Reference</b>
Publicly stated formal policy of zero-tolerance of corruption (D1)	<ul style="list-style-type: none"> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Code of Conduct</li> </ul>
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"> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Global Anti-Corruption Policy</li> </ul>
Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Compliance</i> in SR2015</li> </ul>
Detailed policies for high-risk areas of corruption (D4)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> </ul>
Policy on anti-corruption regarding business partners (D5)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Code of Conduct</li> <li>• <i>Compliance</i> in SR2015</li> </ul>

<b>Criterion 13:</b> The COP describes effective management systems to integrate the anti-corruption principle	
<b>Best practices</b>	<b>Reference</b>
Support by the organization's leadership for anti-corruption (B4)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Compliance</i> in SR2015</li> </ul>
Carrying out risk assessment of potential areas of corruption	<ul style="list-style-type: none"> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Global Anti-Corruption Policy</li> </ul>
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"> <li>• <i>Compliance</i> in SR2015</li> </ul>
Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)	<ul style="list-style-type: none"> <li>• <i>Our sustainability approach</i> in SR2015</li> <li>• <i>Corporate Governance report</i>, AR2015</li> </ul>

Actions taken to encourage business partners to implement anti-corruption commitments (D6)	<ul style="list-style-type: none"> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Global Anti-Corruption Policy</li> <li>• Glencore Code of Conduct</li> </ul>
Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)	<ul style="list-style-type: none"> <li>• Glencore Global Anti-Corruption Policy</li> <li>• <i>Corporate Governance report</i>, AR2015</li> </ul>
Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• <i>Compliance</i> in SR2015</li> <li>• Glencore Global Anti-Corruption Policy</li> </ul>

**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"> <li>• <i>Corporate Governance report</i>, AR2015</li> </ul>
Process to deal with incidents (D13)	<ul style="list-style-type: none"> <li>• <i>Compliance</i> in SR2015</li> </ul>
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"> <li>• <i>Compliance</i> in SR2015</li> <li>• <i>Databook</i> published with SR2015</li> </ul>
Internal accounting and auditing procedures related to anticorruption	<ul style="list-style-type: none"> <li>• <i>Compliance</i> in SR2015</li> </ul>

## 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"> <li>• <i>Chairman's statement</i> in SR2015</li> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Who we are</i> in SR2015</li> <li>• <i>External commitments</i> in SR2015</li> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• Glencore Code of Conduct</li> </ul>
Develop relevant products and services or design business models that contribute to UN goals/issues	<ul style="list-style-type: none"> <li>• Glencore Group Human Rights Policy</li> <li>• <i>External commitments</i> in SR2015</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> </ul>
Adopt and modify operating procedures to maximise contribution to UN goals/issues	<ul style="list-style-type: none"> <li>• <i>Society: Human rights</i> in SR2015</li> <li>• <i>Databook (GRI indicator HR2):</i> SR2015</li> </ul>

**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"> <li>• <i>Measuring our performance</i> in SR2015</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> <li>• <i>Africa: Society &amp; human rights</i> in SR2015</li> <li>• <i>South Africa: Society &amp; human rights</i> in SR2015</li> <li>• <i>North America: Society &amp; human rights</i> in SR2015</li> </ul>

	<ul style="list-style-type: none"> <li>• <i>South America: Society &amp; human rights</i> in SR2015</li> </ul>
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"> <li>• <i>Society: Creating value for society</i> in SR2015</li> </ul>
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"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> </ul>

<b>Criterion 17:</b> The COP describes advocacy and public policy engagement	
<b>Best practices</b>	<b>Reference</b>
Publicly advocate the importance of action in relation to one or more UN goals/issues	<ul style="list-style-type: none"> <li>• <i>Chief Executive's review</i> in SR2014</li> <li>• <i>Chairman's statement</i> in SR2014</li> </ul>
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.

<b>Criterion 18:</b> The COP describes partnerships and collective action	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Chief Executives review: Engagement with stakeholders</i> SR2015</li> <li>• <i>Society: Creating value for society</i> in SR2015</li> </ul>
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"> <li>• <i>Governance: External commitments</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> <li>• <i>Governance: Climate change</i> in SR2015</li> <li>• <i>Public report: Climate change considerations for our business</i></li> </ul>

## Corporate sustainability governance and leadership

<b>Criterion 19:</b> The COP describes CEO commitment and leadership	
<b>Best practices</b>	<b>Reference</b>
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact	<ul style="list-style-type: none"> <li>• <i>Chief Executive's review</i> in SR2015</li> </ul>
CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards	<ul style="list-style-type: none"> <li>• <i>Chief Executive's review</i> in SR2015</li> <li>• <i>External commitments: Our ICM application</i> in SR2015</li> </ul>
CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation	<ul style="list-style-type: none"> <li>• <i>Chief Executive's review</i> in SR2015</li> <li>• <i>Our sustainability approach</i> in SR2015</li> </ul>
Make sustainability criteria and UN Global Compact principles part of goals and incentive	<ul style="list-style-type: none"> <li>• Our CEO and executive management team have substantial shareholdings in Glencore,</li> </ul>



schemes for CEO and executive management team	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.
---	--

<b>Criterion 20:</b> The COP describes Board adoption and oversight	
<b>Best practices</b>	<b>Reference</b>
Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance	<i>Our Sustainability Approach</i> in SR2015
Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability	<i>Our Sustainability Approach</i> in SR2015
Board (or committee), where permissible, approves formal reporting on corporate sustainability	<i>Chairman's statement; Our Sustainability Approach</i> in SR2015

<b>Criterion 21:</b> The COP describes stakeholder engagement	
<b>Best practices</b>	<b>Reference</b>
Publicly recognise responsibility for the company's impacts on internal and external stakeholders	<ul style="list-style-type: none"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Glencore Statement of values</i></li> </ul>
Define sustainability strategies, goals and policies in consultation with key stakeholders	<ul style="list-style-type: none"> <li>• <i>What we report on</i> in SR2015</li> </ul>
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"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Society: Community engagement</i> in SR2015</li> </ul>
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"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Our people: Workforce</i> in SR2015</li> <li>• <i>Society: Community engagement</i> in SR2015</li> <li>• Glencore Code of Conduct</li> <li>• Glencore Group Community and Stakeholder Engagement Policy</li> </ul>

## Business and Peace

<b>Criterion A:</b> Policies and practices related to the company's core business operations in high-risk or conflict-affected areas	
<b>Best practices</b>	<b>Reference</b>
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"> <li>• <i>Society: Human Rights</i> in SR2015</li> <li>• <i>Africa: Working with the Voluntary Principles in the DRC</i> in SR2015</li> </ul>
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"> <li>• <i>Governance: Compliance</i> in SR2015</li> <li>• <i>Society: Human Rights</i> in SR2015</li> </ul>

Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices	<ul style="list-style-type: none"> <li>• <i>Governance: Compliance</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> <li>• <i>Society: Human Rights</i> in SR2015</li> <li>• <i>Glencore Code of Conduct</i></li> </ul>
---	--

**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"> <li>• <i>Governance: Compliance</i> in SR2015</li> <li>• <i>Society: Human Rights</i> in SR2015</li> <li>• <i>Glencore Global Anti-Corruption Policy</i></li> </ul>
Management practices aimed at preventing corrupt relationships with government officials	<ul style="list-style-type: none"> <li>• <i>Governance: Compliance</i> in SR2015</li> <li>• <i>Glencore Global Anti-Corruption Policy</i></li> </ul>

**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"> <li>• <i>What we report on</i> in SR2015</li> <li>• <i>Governance: Product stewardship</i> in SR2015</li> <li>• <i>Africa: Working with the Voluntary Principles in the DRC</i> in SR2015</li> </ul>
Approaches to stakeholder engagement involving civil society, international organisations, etc.	<ul style="list-style-type: none"> <li>• <i>Society: Human Rights</i> in SR2015</li> <li>• <i>Africa: Working with the Voluntary Principles in the DRC</i> in SR2015</li> </ul>
Actions towards constructive and peaceful company/community engagement	<ul style="list-style-type: none"> <li>• <i>Africa: Working with the Voluntary Principles in the DRC</i> in SR2015</li> </ul>
Sustainable social investment projects	<ul style="list-style-type: none"> <li>• <i>Africa: Working with the Voluntary Principles in the DRC</i> in SR2015</li> <li>• <i>Africa: Alternative livelihoods for DRC artisanal miners</i> in SR2015</li> <li>• <i>South America: Society &amp; human rights</i> in SR2015</li> </ul>