

# GLENCORE

Amanda Romero Medina  
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Colombia

Via email: [romero@business-humanrights.org](mailto:romero@business-humanrights.org); [lazala@business-humanrights.org](mailto:lazala@business-humanrights.org)

7 December 2020

Dear Ms Romero,

Thank you for providing Glencore with the opportunity to respond to Derechos Humanos sin Fronteras' (HRWB) letter, *Carta de respuesta a Glencore a la carta del 5 de octubre de 2020*, which raises concerns about negative impacts on local communities in Espinar, Cusco, Peru.

Glencore prioritises respect for human rights everywhere that we operate. As laid out in our Code of Conduct and Group Human Rights Policy, we are committed to working in line with the United Nations (UN) Universal Declaration on Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs) and the UN Global Compact. Our management of security activities is governed by the Voluntary Principles on Security and Human Rights. In addition, our Supplier Standards have strengthened our management of supply chain due diligence to align with the Organization for Economic Cooperation and Development guidelines.

Our general approach is aligned with the International Labour Organization (ILO) Core Conventions (on prohibition of forced labour, child labour, the right to organise in a trade union, and suffer no discrimination) and the Protect, Respect and Remedy framework from the UNGPs. It is outlined in our Group Human Rights Policy and overseen by our Board HSEC Committee.

Our departmental and operational managers have day-to-day responsibility for ensuring that our people work in line with the Code of Conduct and Group Human Rights Policy. We make our Group Human Rights Policy publicly available and actively communicate it to interested shareholders.

We require our assets to conduct regular human rights training for their workforces, with a focus on those employees in positions exposed to human rights concerns, such as security. 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. We report complaints, grievances and serious incidents relating to human rights to the Board HSEC Committee.

## **Glencore plc**

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Our assets have local-level complaints and grievance processes that enable people to raise concerns without fear of retaliation. We work with our assets to confirm that their complaints and grievance mechanisms are appropriate for the local context and aligned with the UNGPs' effectiveness criteria.

In addition, our Raising Concerns programme is available for all Glencore employees, contractors, business partners and other stakeholders who wish to escalate concerns. Concerns can also be raised anonymously. Raising Concerns supports the reporting of concerns in various languages in a secure manner. We investigate and assess all concerns reported through these mechanisms, and report back, when requested, to the complainant on the results.

We report on our progress on the matters raised through these channels to the impacted stakeholders.

As always, Glencore appreciates the opportunity to engage with the Business and Human Rights Resource Centre and provide further information on matters that are of interest to its stakeholders.

Kind regards,

A handwritten signature in black ink, appearing to read 'Anna Krutikov', with a long horizontal flourish extending to the right.

Anna Krutikov  
Group Head of Sustainable Development