GLENCORE





E.E.



Introduction

Our top priority is the health and safety of our workforce, host communities, contractors and others who may be impacted by our operations. We must identify, manage, mitigate or eliminate health and safety risks in our business.

This Health and Safety Policy articulates the fundamental elements of Glencore's approach to health and safety management wherever we operate. It outlines our ongoing commitments to our workforce, their families, local communities and wider society.

Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc worldwide.

We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.

All individuals that enter our sites have an obligation to work in a safe and healthy manner and to look out for one another. Our workforce must report any unsafe acts or conditions to management who will follow up and rectify.

What is our commitment?

Our Code of Conduct and Values guide our behaviours in everything we do. Safety is our first value and our top priority. We never compromise on safety.

Our health and safety ambition is zero fatalities, serious injuries and occupational illnesses. We believe our people have a right to go home safe and healthy to their families and their communities at the end of every day. We are committed to identifying and adopting measures to help us achieve this goal and we openly engage with industry peers and other key stakeholders to improve and share best practices. We expect our leaders to demonstrate a visible commitment to health and safety and to be committed to having a competent workforce that is equipped with the right tools and level of awareness to manage the hazards and risks within their work environment.

The implementation of comprehensive health and safety management systems, our SafeWork programme, and - where appropriate - process safety, is central to protecting people's health and safety. We continually improve our systems so they remain current and reflect leading practice. We implement risk management processes, through which we systematically identify, assess, and manage health and safety hazards and credible risk scenarios associated with our operation. We are committed to providing adequate Health, Safety, Environment and Community (HSEC) emergency and crisis management capability across our organisation.

We assess the hazards of our products in accordance with the UN Globally Harmonised System of Hazard Classification and Labelling, or equivalent relevant regulatory systems, and communicate as appropriate to allow and encourage safe and responsible transport, handling and use.

We promote, educate and support our workforce in making healthy lifestyle choices and recognising the importance of good mental health. We expect everyone entering our site to be fit for work, free of fatigue and not under the influence of alcohol or drugs that may impair their ability to work safely.

We work with employees who have been injured and, when safe to do so, encourage them to return to work. We implement health surveillance systems to support the early detection of adverse health impacts in our workforce and monitor the potential health and safety impacts of our operations on communities with the aim of minimising adverse impacts on them. We achieve this through collaboration with our local communities and government agencies to identify and implement initiatives that improve health in those communities.

We systematically assess leading and lagging health and safety indicators to track the integrity and performance of controls. We also build our people's capability to undertake high quality investigations to identify direct causes and contributing factors of incidents, implement corrective actions and share the learnings to prevent repeat incidents. We implement assurance processes through which we test the suitability, design and implementation effectiveness of our controls and alignment with the International Council on Mining and Metals (ICMM) Performance Expectations.

Speaking Openly and Raising Concerns

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and require them to report any concerns regarding breaches of the Code of Conduct, our policies or the law, whether these relate to themselves or others. These concerns must be raised with managers, supervisors or via other available reporting channels, which includes dedicated whistleblowing contacts at our offices and industrial assets. Our Corporate Raising Concerns Programme channels are also available to employees, contractors and external parties. We also expect employees to report any breaches of requirements in our procedures.

Glencore takes concerns seriously and handles them promptly.

Glencore has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct, policies and procedures, even if the concern isn't substantiated. There will not be any adverse consequences for anyone who raises a concern as long as they have not knowingly made a false report.

Consequences

Our policies support our Values and Code of Conduct and reflect what is important to us. We take breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

(III) Additional resources

INTERNAL

Our Values

Code of Conduct

HSEC and Human Rights Management Standard

SafeWork

Fatal Hazard Protocols

Life Saving Behaviours

Health Standard

EXTERNAL

ICMM Performance Expectations

United Nations Global Compact, Sustainable Development Goals

ISO 45001

UN Globally Harmonised System of Hazard Classification and Labelling

Our purpose

56 Responsibly sourcing the commodities that advance everyday life **99**

ISSUED BYGroup HSEC and Human RightsISSUED ON01.06.2021VERSION1.0

This policy has been approved by the Board of Directors of Glencore plc

Glencore plc Baarermattstrasse 3 CH-6340 Baar Switzerland

 TEL
 +41 41 709 2000

 FAX
 +41 41 709 3000

 EMAIL
 info@glencore.com

 WEB
 glencore.com