

Baar, Switzerland

2 February 2026

Responsible sourcing at Glencore

Glencore recognises the imperative of responsible sourcing and has a comprehensive framework for identifying and managing key risks in our metals and minerals supply chains.

In line with OECD Guidance¹, we take a risk-based approach to due diligence in our supply chains. We identify high risk suppliers using our CAHRA List² and adverse news screening. Where a red flag³ or other potential risks are identified, we undertake enhanced due diligence.

For more detail on our responsible sourcing programme, please read our latest Modern Slavery Statement at [glencore.com/publications/esg-publications](https://www.glencore.com/publications/esg-publications) or visit our website, [glencore.com/sustainability/responsible-sourcing](https://www.glencore.com/sustainability/responsible-sourcing).

Sourcing from Indonesia

As highlighted in the report published by Finnish NGO Finnwatch in January 2026⁴, the Indonesian nickel sector presents specific risks and challenges. We added Indonesia to our CAHRA List in 2025 and where we source from Indonesian suppliers, we have since factored this into our due diligence. This due diligence has included open-source desktop-research, information screening through third-party tools, questionnaires, direct engagement with suppliers, as well as on the ground assessment.

We acknowledge that within industrial parks, operator standards and performance vary. Accordingly, we seek to consider both the policies of the industrial park owners and the practices of the individual operators where material is produced in order to understand the full scope and nature of potential or actual risks.

Our Nikkelverk refinery in Norway processes nickel matte from our Sudbury smelter in Canada, as well as material sourced from third parties by our marketing offices. An annual summary of the supply chain due diligence conducted for the material processed at Nikkelverk is published in its public due diligence report, accessible at [glencore.com/publications/esg-publications#europe](https://www.glencore.com/publications/esg-publications#europe). Nikkelverk produces London Metal Exchange (LME)-registered nickel and so is compliant to the LME's responsible sourcing requirements and maintains a responsible sourcing certification.⁵

¹ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd edition).

² See our website for more information on how we develop and maintain the CAHRA List, <https://www.glencore.com/publications/esg-publications/cahra-list-methodology>.

³ As defined in Annex II of the OECD Guidance.

⁴ <https://finnwatch.org/fi/julkaisut/nikkelituotannon-ihmisoikeus-ja-ympaeristoeongelmat-indonesiassa>. We regret that we were unable to provide a response to Finnwatch's initial outreach due to a technical issue with Nikkelverk's grievance mechanism. This issue was promptly addressed and has triggered a broader review of the mechanism to improve information flow.

⁵ Nikkelverk refinery has been successfully assessed by the Copper Mark against the Joint Due Diligence Standard (JDDS). The JDDS was developed jointly by the Responsible Minerals Initiative (RMI) and the Copper Mark for certification of due diligence processes. The London Metal Exchange (LME) have endorsed the JDDS as aligned with the OECD Guidance. The assessment report is accessible on Copper Mark's website at coppermark.org/participants-home/jdd-sites/.

To date, our due diligence shows that in relation to material sourced from Weda Bay Industrial Park (IWIP) and processed at Nikkelverk, due diligence management systems are in place, alongside ESG policies and reporting that address the types of risks identified in the recent Finnwatch report.

Our due diligence processes are ongoing as we continue to collect and monitor evidence regarding the measures our Indonesian suppliers are taking to prevent, mitigate and remediate any potential or actual risks identified during our risk assessments.

We will carefully review the new findings in the Finnwatch report and consider how to incorporate them into our due diligence. We remain committed to continuous improvement, particularly when operating in complex and high-risk environments.