

Glencore Nikkelverk AS (Nikkelverk) -  
Responsible Supply Chain Due  
Diligence Report

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**Glencore Nikkelverk AS (Nikkelverk) - Responsible Supply Chain Due Diligence Report**

This report outlines how Glencore Nikkelverk AS (Nikkelverk) implements the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) (3rd edition) (OECD DDG) (also known as ‘step 5 report’), for the year ending 31 December 2025 for the metals and minerals listed in the table below.

The report summarises how Nikkelverk meets the brand compliance requirements defined in the *LME Policy on Responsible Sourcing of LME-Listed Brands*, version 2023 (LME Responsible Sourcing Policy).

Date of the Report: 21 May 2026

Responsible for this report: Morten Tølfesen, Quality Coordinator.

Public location of this report: [glencore.com/publications/esg-publications](https://www.glencore.com/publications/esg-publications)

**1 Company information**

Company name	Glencore Nikkelverk AS (Nikkelverk or Nikkelverk Refinery)
Company location	Vesterveien 31, 4613 Kristiansand, Norway 58°08'21"N 7°58'20"E
Description of industrial asset	Nikkelverk Refinery is located on the South Coast of Norway in the town of Kristiansand. Nikkelverk was founded in 1910 by businessmen and engineers, Jacob Børresen, Sam Eyde, Anton Grønningsæter and Viktor Hybinette. Nikkelverk has a production capacity of 101,000 tonnes of Nickel annually.  The raw material feed used to produce the LME brand NIKKN includes both mined and recycled materials.  Website: <a href="https://www.nikkelverk.no">www.nikkelverk.no</a>
Metal/mineral material produced	Nikkelverk produces the following metals/mineral products:  <ol style="list-style-type: none"> <li>1. Nickel (LME brand: NIKKN)</li> <li>2. Copper</li> <li>3. Cobalt</li> <li>4. Gold</li> <li>5. Silver</li> <li>6. Platinum</li> </ol>

	7. Palladium 8. Rhodium
Type of operation	Refinery
Ownership structure, including any subsidiaries	Glencore Nikkelverk AS is an indirectly wholly- owned subsidiary of Glencore plc.

## 2 Third-party assessment summary

Date and period of current assessment	Nikkelverk was assessed against by the LME under Track A and against the Copper Mark’s Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (JDDS) in February 2026, (on full year of 1 January – 31 December 2025 information) and is currently awaiting to be reissued an LME accreditation.
Materials in scope of current assessment	<ul style="list-style-type: none"> <li>– Nickel (LME brand: NIKKN)</li> <li>– Copper</li> <li>– Cobalt</li> <li>– Gold</li> <li>– Silver</li> <li>– Platinum</li> <li>– Palladium</li> <li>– Rhodium</li> </ul>
Assessment firm for current assessment <sup>1</sup>	Arche Advisors, an audit firm accredited by the LBMA and approved by the LME and the Copper Mark.
Date and period of last assessment	Nikkelverk has been successfully assessed by the LME Track A and by the Copper Mark against the JDDS in 2023 (on full year of 1 January – 31 December 2022 information).

<sup>1</sup> Responsible sourcing audits at Glencore are mostly coordinated centrally by GRST. The assurance provider for industrial assets assured against the JDDS and industrial assets producing LBMA brands was selected through the following process: GRST contacted multiple external assurance firms that are recognised and approved by the London Bullion Market Association (LBMA), the London Metal Exchange (LME), the Copper Mark, and the Responsible Minerals Initiative (RMI). These firms were assessed on their technical expertise, relevant sector experience and independence.

URL to most recent assessment summary or assurance report	<a href="https://coppermark.org/wp-content/uploads/2023/07/CopperMark_SummaryReport_Nikkelverk_FINAL.pdf">https://coppermark.org/wp-content/uploads/2023/07/CopperMark_SummaryReport_Nikkelverk_FINAL.pdf</a>
Re-assessment due date	LME: 2026
Assessment period of the last assessment	1 January 2022 – 31 December 2022
Materials in scope of the last assessment	<ul style="list-style-type: none"> <li>– Nickel</li> <li>– Copper</li> <li>– Cobalt</li> <li>– Gold</li> <li>– Silver</li> <li>– Platinum</li> <li>– Palladium</li> <li>– Rhodium</li> </ul>
Assessment firm of the last assessment	Arche Advisors, an audit firm accredited by the LBMA and approved by the LME and the Copper Mark.

### 3 Responsible Sourcing Programme

Glencore recognises the imperative of responsible sourcing and supplying metals and minerals that advance everyday life. Our Responsible Sourcing Programme is our approach to incorporate social, ethical, and environmental considerations in our supply chains and when managing relationships with our suppliers. We expect our suppliers to share our commitment to ethical, safe, and responsible business practices in line with our Purpose and Values. The Programme is underpinned by a framework of policies and procedures:

Glencore Responsible Sourcing Programme

Responsible Sourcing Policy	Supplier Code of Conduct	Responsible Sourcing Standard	Supply Chain Due Diligence Procedure – Metals and Minerals	Other Glencore programmes
<p>Outlines our approach to responsible sourcing, which includes taking into account social, ethical and environmental considerations with regards to our products and supply chains when managing relationships with suppliers. The policy notes that for suppliers of metals and minerals, we conduct due diligence in accordance with the OECD DDG. The policy is available on our website: <a href="#">Our Policies</a></p>	<p>Outlines our requirements and expectations for our suppliers and how they work with us. The Supplier Code of Conduct is available on our website: <a href="#">Our Policies</a></p>	<p>Operationalises the commitments set out in our Responsible Sourcing Policy and Supplier Code of Conduct. Applicable to both our marketing and industrial activities and includes due diligence requirements for the suppliers of our goods and services, and metals and minerals.</p>	<p>Supports the identification, assessment, and management of risks in our supply chain of metals and minerals. Updated in Q4 2024 to incorporate a more formal process for site visits and on-the-ground assessments as part of our risk identification and mitigation. This was rolled out in 2025.</p>	<p>The Responsible Sourcing Programme is closely linked to other programmes and Group requirements such as those outlined in our Ethics and Compliance Programme.</p>

Glencore’s Environment, Social and Governance (ESG) policies, along with publications detailing their implementation, are available here: [ESG-related publications](#).

Nikkelverk applies Glencore’s Responsible Sourcing Programme and implements it through its complementary Nikkelverk Manual for Metals and Minerals Supplier Due Diligence (Nikkelverk Manual) to meet the specific requirements of the LME. The Nikkelverk Manual outlines, in conjunction with Glencore’s Supply Chain Due Diligence (SCDD) Procedure – Metals and Minerals, the steps required to conduct SCDD for Nikkelverk third-party feedstock sources to meet the requirements of our Responsible Sourcing Programme.

The Nikkelverk Manual for nickel and processed by-products, including cobalt, copper and PGMs was originally developed in 2022. Nikkelverk does not purchase the relevant feed material. All feed is received via Glencore marketing offices and provided to Nikkelverk under a tolling structure.

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## 4 Management system

### 4.1 Management structure

Sustainability activities including our Responsible Sourcing Programme at Glencore are overseen by Glencore's Board Health, Safety, Environment and Communities (HSEC) Committee.<sup>2</sup>

The Glencore Group Responsible Sourcing team (GRST) manages the Responsible Sourcing Programme for metals, minerals, goods and services, reporting to the Head of Sustainability. The GRST collaborates with marketing offices and industrial assets across the Group to implement the programme.

The GRST employees have suitable professional expertise and backgrounds relevant to their roles, with experience across the legal, mining, and consulting industries. All new GRST employees are required to receive training during onboarding on the due diligence process and the Glencore Responsible Sourcing Policy framework. GRST employees regularly attend trainings and webinars provided by industry organisations and standard bodies and share know how and best practices.

The GRST conducts a risk-based assessment of selected potential and existing metals and minerals suppliers, based on the five-step framework of the OECD DDG Annex I. If OECD DDG Annex II red flags are identified and/or confirmed, the GRST recommends risk management actions which may include business disengagement or suspension. The risk assessments are supported by a centralised process to support tracking and monitoring.

If the internal department involved in sourcing disagrees with the recommended actions, suspension or disengagement, the Head of Sustainability can escalate the case to the Business Approval Committee (BAC) for a final decision. The BAC is a management-level committee that comprises Glencore's CEO, CFO, General Counsel, Head of Corporate Affairs, Head of Sustainability and, where applicable, the relevant marketing department head/industrial lead involved in the matter being considered by the BAC. Its role is to evaluate business relationships that may pose ethical or reputational risks.

GRST works closely with the Glencore Compliance team, using shared tools and a centralised database of declined and red-flagged parties to help coordinate due diligence effectively.

Glencore's Corporate Compliance team designs, develops and monitors the effectiveness of our Ethics and Compliance Programme. The team includes subject matter experts for each of our key compliance risks and heads of the teams covering the different elements of the Ethics and

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<sup>2</sup> See the *Corporate governance report* section in Glencore plc's latest Annual Report for the description of Glencore plc's Board HSEC Committee members, their skills and experience as well as a description of the training Board members receive, accessible at [glencore.com/publications](https://www.glencore.com/publications).

Compliance Programme. The subject matter experts develop policies, standards, procedures and guidelines in their areas of expertise and provide advice and training, including in relation to KYC, to the business. Compliance employees have suitable professional expertise and backgrounds relevant to their roles.

As part of its efforts to effectively implement the Group's Responsible Sourcing Programme, Nikkelverk Refinery has a dedicated team to oversee supply chain due diligence activities. The team is accountable to the General Manager, who has the overarching responsibility for overseeing the implementation of the Programme at Nikkelverk. The team consists of an HSEC&HR and quality director, quality coordinator, communication officer, human resources director, finance director and compliance coordinator, and is supported by the shipping and metallurgical departments.

The Nikkelverk team is composed of senior professionals with extensive experience in compliance, responsible sourcing, risk management, and operational oversight, and are qualified for their roles. Their backgrounds include formal training and long-standing industry experience in areas such as HSEC, quality management, finance, HR, communications, and metallurgy, providing the expertise needed to carry out the Responsible Sourcing Programme effectively.

The quality coordinator, the quality department and the health, safety and environment (HSE) department are tasked with coordinating the responsible sourcing process conducted at Nikkelverk Refinery, including monitoring of the Supplier Code of Conduct's due diligence process conducted at the Group level. Responsibilities are variously allocated for training and communication on responsible sourcing requirements, coordination of the external grievance process, oversight of the metal accounting systems, internal reporting support to the commercial team and review of SCDD.

## 4.2 Internal systems of control

### Training

Glencore employees undergo regular training on Responsible Sourcing through interactive training modules on risks associated with sourcing metals and minerals as well as procuring goods and services. Employees are also trained on Glencore's Code of Conduct, Supplier Code of Conduct and a range of policies, including on Human Rights, Anti-Corruption and Bribery, Conflict of Interest, Fraud, Sanctions and Raising Concerns and Whistleblowing.

These trainings are delivered across our marketing offices and industrial assets to build awareness and equip sourcing teams with a strong understanding of our Responsible Sourcing Programme. The materials feature practical exercises and hypothetical scenarios designed to demonstrate how responsible sourcing considerations and ethics and compliance challenges may arise in day-to-day decision making.

Employees at Nikkelverk Refinery receive initial introduction training on the Group's Values and an annual refresher course on the Code of Conduct as well as other compliance relevant topics is mandatory for relevant employees. Employees with specific responsibilities for sourcing and receiving materials undergo technical training on Glencore's Responsible Sourcing Policy and

Standard, Supplier Code of Conduct, and the Supply Chain Due Diligence Procedure – Metals and Minerals.

Nikkelverk has communicated Glencore’s expectations with regards to the behavior standards expected from its employees by presentations on info-screens around its premises where new information is presented on a rolling basis. The Code of Conduct and Raising Concerns are part of the rotation. Information is also available on the Nikkelverk intranet.

In 2024, 13 relevant Nikkelverk employees participated in interactive training on the Supplier Code of Conduct, as well as responsible sourcing risks related to metals, minerals and goods and services.

### **Communicating the Supplier Code of Conduct and commercial contracts**

We seek to incorporate our Supplier Code in commercial contracts with suppliers. It is publicly available on Glencore’s website. The Supplier Code also encourages our suppliers to extend these expectations to their own suppliers, helping to promote responsible sourcing across our supply chain. Further, the Supplier Code requires suppliers to have zero tolerance for any form of modern slavery, forced labour or child labour (as defined by the International Labour Organization) in their operations and supply chains. When we refer to zero tolerance, we mean that modern slavery, and child labour, has no place in our supply chains. While we cannot guarantee that it never occurs, we are committed to identifying, preventing and addressing any instances should they arise.

Glencore’s annual *Modern Slavery Statement* sets out the actions Glencore takes to identify and mitigate risks relating to modern slavery, child labour and other human rights-related abuses in Glencore’s supply chains and is available at [glencore.com/publications](https://www.glencore.com/publications).

During the assessment period, all the feed processed by Nikkelverk was purchased through Glencore’s marketing office in Switzerland. Nikkelverk Refinery and our marketing offices follow the same approach and structure as described in section 3 and 4.1. above with respect to onboarding suppliers and concluding or renewing supplier contracts and seek to include relevant Supplier Code related clauses.

### **Payment method**

All payments must be made through official bank transfers. Cash or any other informal payment methods are not permitted.

### **Chain of custody controls**

Material is sealed by the supplier and tagged with lot numbers for transport. Bills of lading, packing lists, certificates of analysis, certificates of origin and weight certificates for each delivery are procured by Glencore’s marketing offices. Raw materials are registered in the Nikkelverk Control Management System. Nikkelverk has controls in place to verify the shipping specifications against the physical material received. Weighing is carried out according to established standard procedures. The number and weight of containers in the cargo are registered in the port contractor’s logistic system. The bags are transported by truck to the refinery. When the final

weight and analysis of metal content is available, they are recorded in Nikkelverk's control management system. There is a monthly stock reconciliation.

Materials are only put to process after the laboratory clears it as fit for process. In case of non-conformity, there is a process in place to segregate the non-conforming materials to prevent contamination and to inform the Commercial Team. The physical inventory is verified as part of Glencore's financial assurance process by a third party to confirm that no material misstatements are made. Checks are made of the quality control process stock counts and financial statements.

Nikkelverk receives regular reports from the Group's marketing offices on feed materials sent to Nikkelverk and the due diligence performed by the GRST. Nikkelverk senior management, the quality coordinator and the HSE and quality departments receive the reports. Nikkelverk requests additional information where required.

### **Speaking openly and raising concerns**

Glencore is committed to fostering a culture where everyone, including employees, contractors, directors, and officers at our offices and industrial assets, as well as third parties such as customers and suppliers, feel empowered to express concerns and are able to do so securely and confidentially with the option of remaining anonymous. Under the Glencore Code of Conduct, all employees and contractors are required to report breaches of the Code, policies or the law. This includes issues related to the Glencore Responsible Sourcing Policy and Supplier Code of Conduct. Concerns can be raised through local whistleblowing contacts or the Glencore Group Raising Concerns Platform. The platform is open to all stakeholders, including communities, shareholders, or business partners, and can be used to raise concerns regarding the circumstances of mineral extraction, trade, handling, and export. Concerns are assessed and (where required) investigated independently and impartially, with remedial action taken where necessary. Reports submitted through our reporting channels are acknowledged, typically within seven business days (or sooner where required by law). Subject to confidentiality requirements, reporters receive updates at key stages of the process and are informed of the outcome upon completion of the investigation. Glencore does not tolerate retaliation of any kind.

The operation of the Glencore Raising Concerns Programme is overseen by a senior committee that includes the Glencore CEO, CFO, General Counsel, Chief Operating Officer, Head of Human Resources, and Head of Compliance. The Glencore Board also receives regular updates regarding concerns reported through our whistleblowing channels and the management/investigation of such reports.

Nikkelverk employees and contractors are informed about the local whistleblowing contacts and the Raising Concerns platform during the onboarding process and through regular updates on information screens and the intranet. Nikkelverk employees and contractors have access to Glencore's Raising Concern Platform.

During the reporting period, there have been no concerns raised through our whistleblowing channel with regards to Nikkelverk's supply chain of metals and minerals and there were no outstanding relevant cases from prior periods requiring closure.

## Local complaints and grievances mechanism

Nikkelverk maintains its own local grievance processes in accordance with Norwegian legislative requirements. This local complaints and grievance mechanism is designed to address complaints or grievances on both actual and perceived issues raised by any stakeholder who may be affected by the activities or presence of our operations.

Where people have complaints or grievances, we aim to investigate and resolve them at a local level. Nikkelverk local external stakeholders can raise complaints and grievances via the external facing website <https://www.nikkelverk.no/en/contact>, which offers an email address, (post@glencore.no) and phone numbers for emissions, noise and unwanted events and an email address (varsling@glencore.no) for unethical practices. Anonymity is maintained, and there is a strict zero-tolerance policy for retaliation against anyone who raises a complaint or grievance.

Employees are made aware of the local complaints and grievance process through the induction process when joining the company and are reminded through awareness messaging on the intranet and around the operations. At Nikkelverk, the local complaints and grievance process are accessible in English and Norwegian.

Grievances received through local reporting channels are formally acknowledged within seven working days, and complainants are informed that their complaint has been registered. When a grievance is submitted through a local channel, the local reporting contact or administrator must forward the report to the Local Concerns Administrator (LCA) within 72 hours, ensuring timely assessment and entry into the system.

Investigations follow a structured and confidential process, including defining the scope, collecting and securing evidence, conducting interviews, and documenting findings. A Lead Investigator with appropriate experience and independence is appointed, and both the investigator and case owner aim to complete the investigation within 60–90 days.

Throughout the process, complainants may receive general updates — such as confirmation when the investigation starts and when it concludes — while respecting confidentiality and legal requirements. Complainants are normally informed of the outcome and any planned or implemented corrective actions within 90 days of the initial report. Once corrective or remedial actions are completed and documented, the case is formally closed, and complainants are notified where permitted.

A request on topics in scope of the Norwegian Transparency Act was received in 2025 and Nikkelverk engaged accordingly with the requesting party.

During the reporting period, no complaints or grievances related to Nikkelverk’s supply chain were recorded, and there were no outstanding relevant cases from prior periods requiring closure.

### 4.3 Record keeping system

Glencore’s [Information Governance Policy](#) sets out our approach to handling company information, including personal data. Information on suppliers is stored according to the

applicable local Retention and Destruction Procedure and a Glencore retention schedule which outlines the minimum retention time, which is based on the document type.

Nikkelverk Refinery requires that all records, including those relating to the supplier risk management, for example responsible sourcing, chain of custody and training evidence, are maintained as required under local law (including privacy laws) and in accordance with best document retention practice as described in Nikkelverk's Internal Policy for the Storage, Deletion and Destruction of Documents and Records. Responsible sourcing related documents are maintained for a minimum of 10 years before being destroyed. They are safely stored in a combination of physical and electronic records.

## 5 Risk identification

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### 5.1 Our approach

Glencore identifies and manages risks for metal and mineral suppliers through the Ethics and Compliance Programme and the Responsible Sourcing Programme.

#### **Compliance - Know Your Counterparty (KYC)**

KYC is an integral component of our Ethics and Compliance Programme and our broader business partner management framework. Corporate and regional compliance teams conduct due diligence screening on suppliers and other counterparties during onboarding and on an ongoing basis. This includes, for example, screening against sanctions lists, law enforcement and regulatory enforcement databases, and politically exposed person (PEP) watchlists.<sup>3</sup>

#### **Supply chain due diligence**

Glencore's approach to identifying and managing key risks in our metals and minerals supply chains is risk based and includes information gathering, onboarding, ongoing engagement, corrective actions and monitoring and in some cases disengagement, as appropriate.

Our risk-based approach is guided by a list of Conflict Affected and High-Risk Areas (CAHRAs)<sup>4</sup>, and supported by tools such as third-party database screenings, open-source desktop research, and supply chain due diligence questionnaires.

These tools support our structured due diligence process, through which the GRST assesses human rights and other applicable ESG risks in our metal and mineral supply chains.

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<sup>3</sup> Please see our 2025 [Ethics and Compliance Report](#) (available at [glencore.com/publications](https://www.glencore.com/publications)), specifically page 44, which includes a graphic describing of our business partner management framework. This framework seeks to ensure that all business partners are assessed using a risk-based approach, which directs them to the most appropriate due diligence and management process. For additional detail on: (i) the KYC risk classification methodology, please refer to page 45, (ii) the third-party risk classification methodology, please refer to page 48; and (iii) the JV partner/M&A target risk classification methodology, please refer to page 52.

<sup>4</sup> Please refer to our website at <https://www.glencore.com/publications/esg-publications/cahra-list-methodology> to find out more about how we develop and maintain our CAHRAs list.

The CAHRAs list helps us identify areas with potential elevated human right risks within our supply chains. CAHRAs typically include regions or countries with socio-economic or political crises, institutional weaknesses, poor governance, or widespread violence, including armed conflict. Such environments can increase the likelihood of human rights abuses, including torture, cruel or inhumane treatment, child labour, forced or compulsory labour, and sexual violence.

Enhanced due diligence (EDD) is initiated for suppliers operating in, sourcing from or transporting through a CAHRA and/or those flagged through negative news are assessed against risks associated with the extraction, transport or trade of minerals specified in Annex II of the OECD DDG.

Where appropriate, we may adapt our due diligence approach to the specific risks and country contexts relevant to individual suppliers and producers. Where appropriate, outreach may be targeted beyond direct counterparty contact to where leverage and access to quality information are greatest by engaging with a supplier's or producer's parent entity on relevant ESG practices across their global or regional operations. This approach can, where applied, enable a more complete and substantiated assessment of the producer's due diligence systems.

When necessary and where feasible, on the ground assessments may also be conducted as part of the EDD process.

In 2025, Indonesia was added to the Group's CAHRAs list, reflecting an increase in adverse news reporting and the inclusion of Indonesian nickel on the US List of Goods Produced by Child Labor or Forced Labor. A key concern relates to the risk of forced labor in large-scale industrial parks in Indonesia where nickel and nickel-containing products are processed. Accordingly, where the Group sources metals and minerals including nickel from Indonesian suppliers, this is factored into the due diligence process and all Indonesian suppliers are now in scope of enhanced due diligence requirements.

## 5.2 Results

During the reporting period, Nikkelverk Refinery processed feed from other Glencore industrial assets that have implemented Glencore's Responsible Sourcing Programme, as well as from third-party suppliers. All feed sources were screened by the GRST following the risk-based approach described in Section 5.1, including material sourced for Glencore industrial assets supplying Nikkelverk.

In 2025, Nikkelverk Refinery received and processed a mix of 100% recycled material, as well as primary or mined material. In 2025, Nikkelverk processed feed from third-party suppliers, of which some of the producers are located in Indonesia. This material was received by Nikkelverk in 2023 and 2024 from Indonesian nickel suppliers. In 2025 no nickel-bearing material from Indonesia was received by Nikkelverk.

The GRST identified adverse news about some of the Indonesian producing smelters in 2023 and 2024. The adverse news identified the following alleged abuses:

- problematic work conditions and infringement of workers' rights
- occupational health and safety and labour issues

- environmental issues, including pollution
- social issues
- suspected bribery

In continuation of our enhanced supplier engagement on the Indonesian suppliers where adverse news was identified, we continued to gather evidence throughout 2025 regarding measures in place and steps being taken to prevent, mitigate and remediate any potential or actual risks of the alleged abuses, and on efforts made to address any impacts on affected stakeholders.

One supplier which was associated with some of the adverse news listed above is currently undergoing a third-party independent ESG performance assessment. The GRST is monitoring this process and will review and assess the findings upon their publication.

Another Indonesian supplier, which was not associated with the adverse news described above, was also assessed on the basis of publicly available information. This information suggests that it has management systems in place to identify and mitigate ESG-related risks at its own operations, as well as responsible sourcing related risks in its supply chain. Publicly available information shows that these systems have been independently audited and certified against recognized standards. On this basis, the GRST determined that the evidence identified for this producer was sufficient to conclude the EDD process, without requiring direct engagement with the supplier.

For additional Indonesian suppliers, the GRST engaged directly with the Indonesian suppliers' parent entity, which provided a suite of policy documentation covering areas such as biodiversity, labour rights, and occupational health and safety, as well as an update on the status of third-party audits at their facilities. The provision of this policy documentation indicates a degree of development and suggests an improved position of the ESG framework of the parent entity relative to the baseline observed at the outset of the EDD process in 2024. Upon further request by the GRST for evidence of on-the-ground implementation, the Indonesian suppliers' parent entity provided training records related to the management systems disclosed. These developments suggest that management systems to mitigate risk are being established and embedded. The GRST will continue to monitor progress against the identified risk areas and is considering an on-the-ground assessment.

The identification of adverse media relating to Indonesian suppliers prompted the GRST to broaden its supplier engagement, moving beyond initial engagement at counterparty level, to direct engagement with some of the Indonesian producers' parent entity. Additionally, the challenges encountered in obtaining timely and substantive responses from suppliers informed a revision of engagement timelines and follow-up processes, enabling the GRST to set clearer expectations and deadlines for information requests.

No red flags were identified during the screening process in relation to the remaining third-party suppliers and there was thus no need to trigger EDD on these suppliers.

## 6 Risk mitigation

Following the risk identification process described above, where the GRST identifies risks in the supply chain which require risk management actions, the GRST proposes bespoke CAPs tailored to the severity of the risks identified and the size and complexity of the supplier's company. Specific timeframes for measuring objective improvements are detailed in the CAPs, which are

incorporated into the supplier's contractual obligations where appropriate and feasible. When sourcing from, operating in, or transiting through CAHRAs, Glencore follows the OECD DDG, including the Annex II approach to mitigating risks and, where required, suspending or terminating suppliers. This approach is embedded in our Responsible Sourcing Policy.

As detailed in Section 5.2., engagement with the parent entity of the Indonesian suppliers that triggered EDD is ongoing. While engagement has progressed in 2025, with new documentary evidence having been reviewed on the smelters' implementation of the parent company's ESG management systems, the GRST is evaluating the need for an on-the-ground assessment as a risk mitigation tool.

## **7 Extractive Industry Transparency Initiative**

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Glencore has been an active supporter of the Extractive Industry Transparency Initiative (EITI) since 2011 and engages with the EITI at both local and international levels. We recognise the contribution of EITI's principles of transparency and accountability towards establishing a global standard of good governance for the extractives and commodity trading industries.

The EITI expects supporting companies to promote transparency by publicly disclosing its payments made to governments. We pay all relevant taxes, royalties and other levies in amounts determined by the legislation of relevant national, regional and local governments and report on these in line with our UK regulatory obligations in our *Payments to Governments Report*, accessible at [glencore.com/publications/esg-publications](https://glencore.com/publications/esg-publications).

Where we operate industrial assets in EITI-implementing countries, we provide local EITI disclosures, participate in local multi-stakeholder groups and engage in policy consultation processes as appropriate. Glencore also promotes commodity-trading transparency by disclosing the commodity trading payments Glencore makes to state-owned enterprises in EITI-implementing countries for the purchases of oil and gas, and minerals and metals. For more information and to view our EITI commodity trading disclosures, see our website [glencore.com/who-we-are/transparency/eiti-SOE](https://glencore.com/who-we-are/transparency/eiti-SOE).

**Important information**

This material does not purport to contain all of the information you may wish to consider. The general approach to our Responsible Sourcing Programme described herein may be subject to certain exceptions. For example, for certain business activities we apply a bespoke approach, such as in connection with the purchase of certain energy products when aspects of our Responsible Sourcing Programme may not be possible to observe due to market practice and other factors. Some information cannot be publicly disclosed because of commercial sensitivities. For more information about our supply chain, please contact: [supplychainduediligenceM.M@glencore.com](mailto:supplychainduediligenceM.M@glencore.com).

**Cautionary statement regarding forward-looking information**

Certain descriptions in this document are oriented towards future events and therefore contains statements that are, or may be deemed to be, “forward-looking statements” which are prospective in nature. By their nature, forward-looking statements involve known and unknown risks, uncertainties and other factors which may cause actual results, performance or achievements to differ materially from any future events, results, performance, achievements or other outcomes expressed or implied by such forward-looking statements. No statement in this document is intended as any kind of forecast (including, without limitation, a profit forecast or a profit estimate), guarantee or prediction of future events or performance and past performance cannot be relied on as a guide to future performance. Except as required by applicable rules or laws or regulations, Glencore is not under any obligation, and Glencore and its affiliates expressly disclaim any intention, obligation or undertaking, to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise. For further information, see the “Important notice” section of the latest Half-Year Report and Annual Report of Glencore plc, which can each be found at [glencore.com/publications](http://glencore.com/publications).

**Information preparation**

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**Other information**

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