

Working Group on the issue of human rights and
transnational corporations and other business
enterprises
C/O Federica Donati
Administrator
Special Procedures Branch OHCHR
By e-mail

Baar, Switzerland, 30 June 2025

Ref: AL OTH 29/2025

Dear Working Group Members and Special Rapporteurs,

As noted in your letter, Glencore divested its interest in the Bolívar mine in October 2021, prior to the majority of the allegations cited in the letter.

At the time of the divestment, the operation had undertaken reviews of socio-environmental concerns and issues and established social programmes aimed at improving community development and participation.

Given the time that has passed since then and the continued evolution of the Glencore human rights programme, the information below provides an overview of our current approach, shared in the spirit of constructive engagement, and should not be seen as relating to any of the specific allegations or events.

Our human rights programme

We recognise that we have the potential to impact human rights directly through our operations and take allegations relating to human rights very seriously. We are committed to respecting human rights in line with the UN Universal Declaration of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, the UNGPs and the UN Global Compact.

Respect for human rights is enshrined in our [Code of Conduct](#) and is further governed by a comprehensive framework of [policies](#) and standards.

Our approach is based on:

- undertaking human rights due diligence
- avoiding causing or contributing to adverse human rights impacts
- preventing or mitigating adverse impacts linked to our industrial assets, and
- identifying opportunities to make a positive contribution to the promotion of human rights wherever we operate.

Our human rights programme has developed significantly in recent years, and we continuously seek opportunities to enhance our approach in response to evolving expectations and feedback from our stakeholders, including the rights-holders who may be affected by our activities.

We outline below select aspects of our human rights programme corresponding to the points raised in your letter. Further details on our sustainability framework, our approach to its implementation and its performance and ambitions, are available in our Annual Report, Sustainability Report and other sustainability-related publications at glencore.com/publications.

Human rights due diligence

We conduct human rights due diligence to identify, prevent and mitigate human rights risks and impacts across our business. This approach is guided by our salient human rights risks, or those risks that have the most severe and widespread impact on people, allowing us to focus our efforts and resources and to proactively manage impacts. Our salient human rights risks include risks related to Indigenous Peoples as well as livelihoods and resettlement. We regularly review our salient human rights risks, most recently in 2024, and publicly report on them.

Our [Human Rights Policy](#) reflects our commitment to conducting human rights due diligence across our operations. As part of this process, we investigate all incidents where our industrial assets may cause or contribute to an adverse impact on human rights, ensuring that such incidents are reported internally and addressed rigorously. We provide for, or cooperate in, processes to enable an appropriate remedy and/or a corrective action plan. The implementation of our [Human Rights Policy](#) is overseen at the highest level by our [Board HSEC Committee](#).

Commitment to transparency

We are committed to high standards of corporate governance and transparency. We seek to maintain long-term, open, transparent and constructive relationships and dialogue with our key stakeholders. Through our presence, we can deliver significant and sustainable economic benefits to our host governments, employees, suppliers and communities.

We seek to understand and manage our impacts and generate sustainable benefits for our host communities, while also promoting diversified and resilient local economies. We believe transparency encourages the responsible management of revenues, gives an improved understanding of our activities and contributions, and strengthens accountability.

Grievance mechanisms

Access to remedy is a core aspect of our management of and respect for human rights. All our industrial assets are required to operate local complaints and grievance mechanisms that meet the UNGP effectiveness criteria. These mechanisms are accessible to local communities and designed to address complaints and grievances on both actual and perceived issues raised by any stakeholder who may be affected by the activities or

presence of our operations. In line with the UNGP criteria, our industrial assets are required to investigate and respond to complaints and grievances in a timely manner, maintain an open dialogue with relevant stakeholders, and initiate or participate in remedies to address adverse impacts.

The type and frequency of complaints and grievances made via our industrial asset operated mechanisms undergo regular reviews at Group level. When appropriate, further action is taken to address recurring, high frequency or serious complaints.

Our industrial assets also undertake periodic gap assessments of their local mechanisms, most recently in 2024, for conformance with our internal standards and alignment with the UNGP effectiveness criteria in order to support the strengthening and updating of local processes.

We investigate concerns locally or through our headquarters, depending on factors such as the nature and severity of the concern. In addition to the complaints and grievances mechanism, we also have a Raising concerns platform focused on addressing concerns related to breaches of our Code of Conduct, policies or legislation. We have a comprehensive suite of documents which establish a framework for managing concerns, including our [Raising Concerns and Whistleblowing Policy](#).

Our policies make clear that we do not tolerate retaliation against anyone who raises complaints, grievances or concerns, regardless of whether these are ultimately substantiated.

Indigenous Peoples

As stated in our [Social Performance Policy](#), we respect the rights, interests, perspectives and aspirations of Indigenous Peoples and acknowledge their right to maintain their culture, identity, traditions and customs. As an ICMM member, we are implementing [the ICMM Position Statement on Indigenous Peoples and Mining](#) (2024). In line with this, we commit to carrying out due diligence to identify, prevent, mitigate and account for possible adverse impacts on Indigenous Peoples' rights.

The foundation of our industrial assets' community relationships is continuous, with robust engagement tailored to local conditions and supported by a socio-economic knowledge base, stakeholder engagement and human rights due diligence.

Our supply chains

We expect our suppliers to share our commitment to ethical, safe, and responsible business practices and act in a manner consistent with our [Supplier Code of Conduct](#), which is mapped to Glencore's Code of Conduct and sets out our requirements and expectations, including in relation to human rights, namely:

- We expect our suppliers to respect their workforce's internationally recognised human rights as set out in the UN Universal Declaration of Human Rights and in a manner consistent with the UNGPs.
- We expect our suppliers to understand and address human rights risks that may arise from their business activities and supply chain.
- If suppliers cause or contribute to an adverse impact on human rights in their business activities and supply chain, we expect that they provide for, or cooperate in, processes to enable an appropriate remedy.

We communicate openly on how we conduct due diligence on our suppliers. Our annual [Modern Slavery Statement](#) sets out our commitment to responsible sourcing and the actions we take to identify and mitigate risks relating human rights-related abuses, such as modern slavery and child labour.

We remain open to continued engagement with our stakeholders and welcome the opportunity to strengthen transparency in our industry.

Yours sincerely,



Anna Krutikov
Head of Sustainability, Glencore