

Mr Damilola S. Olawuyi
Chair-Rapporteur
Working Group on the Issue of Human Rights and
Transnational Corporations and other
Business Enterprises
United Nations Office of the High Commissioner for Human
Rights

Baar, 17 July 2026

Reference: AL OTH 37/2026

Dear Members of the Working Group and Special Rapporteurs

We refer to the joint communication issued by the Special Procedures and addressed to Glencore plc (Glencore) dated 9 April 2026 (Ref. AL OTH 37/2026) and our letter of 9 June 2026. Glencore wishes to thank you for bringing the allegations to its attention.

Compañía Minera Antamina S.A. (CMA) operates the Antamina mine and is the entity directly concerned by the allegations. CMA is an independently managed joint venture, with shares held by BHP (33.75%), Mitsubishi (10%), Teck (22.5%) and Glencore (33.75%). The shareholders do not have operational control over CMA's day-to-day activities, including its environmental, community relations and security programmes. As a non-operating shareholder, Glencore engages with CMA through its nominated representatives on CMA's board of directors and governance committees. We understand that CMA has, or will shortly, respond to you with clarifications on the factual allegations raised and we refer you to CMA's response on those allegations.

This response is intended to set out Glencore's approach to upholding respect for human rights as an investor in independently managed joint ventures. We have extensive information available on our website on the approach we take in respect of assets that Glencore operates. This includes our recognition of the important role played by human rights defenders and civil society in promoting accountability and our commitment to ensuring that individuals and communities can raise concerns freely and without fear of reprisal, as well as the details of our requirement for the industrial assets that we operate to have in place local, accessible, credible and culturally appropriate complaints and grievance processes that are aligned with the UNGPs effectiveness criteria.

We are committed to respecting human rights in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our Human Rights Policy contains an explicit commitment to respect human rights. That commitment and the underlying policy have been approved at the most senior level of Glencore and have been informed by internal and external human rights expertise. The policy is communicated both internally and externally and is embedded in our operational policies and procedures.

As part of our human rights due diligence process, we have established group-wide policies and standards setting requirements for the identification, prevention, mitigation and accounting for adverse human rights impacts across our own operations. In the case of independently managed joint ventures, our Code of Conduct, Responsible Sourcing, Human Rights and Raising Concerns and Whistleblowing Policies require our representatives at those joint ventures to assert our influence to encourage those joint ventures to act in a manner consistent with our Values and Code of Conduct and the intent of these policies. Our Human Rights Policy also sets out our commitment to preventing and mitigating adverse human rights impacts linked to our operations through our business relationships, including joint ventures, consistent with Principle 16(c) of the UNGPs. In the specific case of CMA, Glencore exercises this influence in part through its representatives on CMA's Environment and Communities (E&C) Committee, which provides a governance forum for Glencore to actively engage with CMA in relation to identifying, preventing and mitigating human rights impacts at an operational level.

Our Raising Concerns platform offers various channels to raise concerns confidentially, and is available to all stakeholders, including those related to our independently managed joint ventures. We maintain a zero-tolerance policy for retaliation and expect our non-operated joint ventures to uphold the same standard.

We communicate on our approach and performance through a number of publications, including our Annual Group Sustainability Report, our Annual Modern Slavery Statement, and on our Group website. In addition, our Human Rights Policy, Social Performance Policy, Raising Concerns and Whistleblowing Policy, Responsible Sourcing Policy and Supplier Code of Conduct are publicly available on our website ([Our Policies](#)).

We have engaged closely with CMA's management team in the preparation of its response to the enquiry from the Working Group. Looking ahead, we intend to continue to use our influence to promote CMA's continued adherence to international standards and responsible management of its social and environmental impacts. Where appropriate, we also seek to leverage our business relationship with CMA to promote dialogue with other stakeholders to advance these commitments. To the extent that any adverse human rights impacts are proven to have occurred, which were caused by Antamina or to which Antamina contributed, we intend to use our influence to encourage CMA to take appropriate action.

We remain open to any further enquiries from the Working Group, and look forward to continued dialogue.

Yours sincerely,



Anna Krutikov
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Glencore International AG