Modern Slavery statement 2018
Introduction

We recognise that we have a responsibility to respect and uphold the human rights of our people, and of the local communities where we operate.

Glencore Agriculture is a market leader in the sourcing, handling, processing and marketing of agricultural commodities. We source grains, oilseeds, pulses, rice, sugar and cotton from producers and supply them to our customers around the world.

With a workforce of approximately 13,000 people and operations in more than 35 countries, we recognise that we have a responsibility to respect and uphold the human rights of our people and of the local communities where we operate. As part of our ongoing commitment to preventing the violation of human rights in our operations and supply chains, Glencore Agriculture is pleased to introduce this Modern Slavery statement.

As the demand for agricultural goods rises, we have to make sure the demand is not met at the expense of our communities or the environment. A zero tolerance approach to modern slavery in any form is a moral imperative for our company and we support the goal of reducing the exploitation of individuals at the hands of others. Our customers, along with consumers, have an increasing focus on the supply chain’s sustainability of the products they buy.

This document demonstrates the action we have taken, and progress we intend to make, to ensure we play an active role in the reduction of the occurrence of Modern Slavery throughout our operations and supply chains.
Who we are

Glencore Agriculture became an independent company in 2016, after more than 30 years as part of Glencore, one of the world’s largest global diversified natural resource companies.

We are owned by three shareholders: Glencore plc, the Canada Pension Plan Investment Board (CPPIB) and the British Colombia Investment Management Corporation (BCI).

Our business covers the whole supply chain, from farm gate to the customer. Using our network of storage facilities, processing plants and transport assets we process, manage and supply commodities and products to our customers around the world. Our customers include the processing industry (food, animal feed and consumer products), local importers and distributors and governments.

Through our industry insight, strong relationships and network of assets, we focus on the sustainability, safety, quality and reliability of everything we do.
Our values of safety, entrepreneurialism, simplicity, responsibility and openness reflect our priorities and beliefs by which we conduct ourselves. They are the fundamental basis of our sustainability framework, along with our Code of Conduct and Glencore’s Group policies.

**Our policies**

Following the divestment of Glencore Agriculture by Glencore plc in 2016, we have continued to align our approach in accordance with Glencore’s Human Rights Policy, Code of Conduct and Global Anti-Corruption Policy throughout the Glencore Agriculture Group. We also take part in, and benefit from, Glencore’s Raising Concerns programme and Compliance e-learning programme.

Our policies and operational processes embed our commitment to respect human rights. We are members of the United Nations Global Compact, a set of principles covering human rights, labour, environment and anti-corruption and we work in accordance with relevant international frameworks, including the Core Conventions of the International Labour Organization (ILO).

We do not tolerate any form of workplace discrimination, harassment or physical assault, or any form of child, forced, or compulsory labour. We seek to reflect the diversity of the communities in which we operate in our workforce. We respect the rights of our employees and contractors, including freedom of association and collective bargaining. Throughout our operations, we seek to avoid complicity in human rights abuses, and to uphold relevant international standards.

### Related documents:

- Statement of values
- Code of Conduct
- Group Human Rights Policy
- Global Anti-Corruption Policy

You can find all documents mentioned within this statement at [www.glencoreagriculture.com](http://www.glencoreagriculture.com)

At the start of their employment, our employees receive the Code of Conduct, which includes our approach to respecting and upholding human rights throughout our operations. In the event that an employee is aware of a situation that breaches our Code of Conduct, they can raise their concerns via our Raising Concerns programme.

Our e-learning training on our Code of Conduct targets employees with regular access to a work computer. For those employees who do not have regular access to a work computer, we provide training in other ways including pre-shift general training and toolbox talks. Additionally, for relevant employees, our compliance teams conduct face-to-face training on our compliance policies and procedures and to raise awareness about compliance risks related to their functions.

In addition, those employees that have a responsibility to ensure the implementation of human rights are required to undergo further training aligned with international human rights standards. We operate grievance mechanisms at all our operations for our stakeholders.
Raising concerns programme

If one of our people encounters a situation that appears to breach our policy framework, including those on human rights and modern slavery, they must raise this promptly with his or her immediate supervisor or manager. Alternatively, the individual may raise the concern with another appropriate manager, compliance officer or coordinator, or a member of Glencore’s Business Ethics Committee.

Our Raising Concerns programme provides mechanisms, including telephone and online platforms, which can be accessed if the concern remains unresolved.

The different mechanisms reflect local conditions to ensure ease of use, such as internet availability and languages spoken, but also provide for raising concerns on an anonymous basis. We publicise the local mechanisms through dedicated training and visual material, such as posters, available widely throughout work sites.

Nobody working for Glencore Agriculture suffers demotion, penalty or any other disciplinary action for raising a concern in good faith.
What we do

Marketing
We supply our customers with commodities direct from producers

Storage & handling
We have storage facilities in key growing regions

Processing & refining
We turn commodities in to value-added products, from sugar to refined oil and protein meals

Logistics
Our rail, road and sea transport network spans the globe

Port terminals
We own port terminals in key export origins to provide reliable delivery of commodities

We source grains, oilseeds, pulses, rice, sugar and cotton from producers in the main export areas and supply them and value-added products to our customers around the world.

This means storing them, transporting commodities by sea, rail and truck, processing them into a range of useful products, and delivering them on time, to the quality and specifications our customers expect.

We have strong relationships with thousands of producers and farming cooperatives in key growing areas around the world – many of them have supplied our company for generations. We are also a major employer in many of the areas where we operate and have a responsibility for the health, prosperity and sustainability of those communities.

Glencore Agriculture is committed to supporting the development of these communities; funding local schools and education programmes, improving healthcare facilities and working with charities who provide essentials such as food and shelter to those in need.

Supplier due diligence and risk management

We have zero tolerance towards any form of forced labour, child labour, physical assault or harassment within our workplace. We care greatly about our performance in health and safety, compliance, environment and human rights, and comply as a minimum with standards set by the ILO across all our assets and field offices.

We work with a vast number of suppliers and third parties, some of which are located in remote and rural locations where there is a lack of regulation to uphold human rights amongst small, local businesses. We acknowledge a need to implement supplier due diligence and risk assessment procedures throughout our operations to improve our performance in this area and are working to introduce a supplier standard and due diligence process in to our future contracts with third parties.
Our progress

Working together to improve labour standards

We do not accept modern slavery practices in any of our business activities, from our third parties or our suppliers. However, we are aware that agricultural supply chains include products which are associated with modern slavery risks. To address the risks of modern slavery that are prevalent in this industry, market leaders must make a combined commitment to bring about quantifiable action across the industry.

In 2018 we joined the UN Global Compact, an organisation which calls its members to align their operations with universal principles on human rights, labour, environment and anti-corruption. As a member, Glencore Agriculture pledges to implement changes to business operations and strategy, incorporating the Ten Principles of the UN Global compact. By joining the organisation, we make a commitment to informing our stakeholders annually of our efforts to implement the UN Global Compact, reporting progress on our website and other communication channels.

We also became members of the World Business Council for Sustainable Development (WBCSD) in 2018. As members, we will participate in collaborative projects with other members to tackle environmental and social issues specific to the agriculture industry.

Supplier due diligence in our soy procurement

In September 2018, Glencore Agriculture fully incorporated a farm monitoring system, SimFaz, into our soy procurement business in Brazil. The AgroSatellite system combines several up-to-date sources on environmental, social and legal issues.

The SimFaz system includes Green Grain Protocol, embargoes of the Brazilian Institute of Environment and Renewable Natural Resources, the Amazon Protection System, and the Amazon Soy Moratorium. Several other additional indicators can also be analysed, including labour conditions analogous to slavery.

Proposed suppliers who do not meet the minimum requirements identified by the SimFaz database are automatically flagged within our system. A deeper analysis is then carried out, after which we are able to guide the supplier on how they can improve the sustainability of their business.

Sourcing cotton responsibly

Glencore Agriculture is a leading marketer of raw cotton. We export from the main producing regions in the US, Australia, Brazil, India and West Africa.

We are members of the Better Cotton Initiative, the International Cotton Association and various other national cotton associations looking to eradicate forced or child labour from the cotton industry.

Through our strong relationships with suppliers, we fully support standards set by these associations and play an active role in developing labour standards within the cotton industry.
Looking ahead

Glencore Agriculture is committed to being a part of sustainable change, including the elimination of modern slavery within agricultural supply chains. We acknowledge the need for further action across the industry, and are working on the below projects and processes to further advance our own performance.

Development of Glencore Agriculture’s Human Rights Policy
We are in the process of reviewing Glencore plc’s human rights policy in order to develop our own policy, specifically addressing human rights focus areas within agricultural supply chains.

Supplier standards
Upon entering business with suppliers and third parties, we share our expectations of fair and ethical business practices. We are working on the development of our supplier standards of conduct, which will be included in future contracts with suppliers and third parties.

Supplier risk-assessments
To further ensure practices of Modern Slavery do not enter our supply chains, we are looking to develop and implement risk assessment processes with suppliers and third parties across our operations.

Working with organisations dedicated to eliminating exploitation
Glencore Agriculture is continuously seeking opportunities to engage in community initiatives and projects to develop the areas in which we operate. We are pleased to confirm collaborations with new organisations moving in to 2019 such as Childhood Brazil’s On the Right Track programme, an initiative aimed at training truck drivers to identify suspected or confirmed instances of child sexual exploitation and report them to local authorities.

David Mattiske
CEO, Glencore Agriculture
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