

GLENCORE

CANADIAN POLICY ON PARTNERSHIPS, DONATIONS AND SPONSORSHIPS



General framework

Glencore's aim is to ensure the responsible supply of raw materials that "advance everyday life and are necessary to develop, maintain and improve the world around us."

Glencore produces, processes, recycles and trades raw materials all over the world. Its production sites contribute to the dynamism and economic vitality of the countries and regions that host them.

The Canadian Policy on Partnerships, Donations and Sponsorships is part of Glencore's Social Contribution Framework and defines the framework for the analysis of donations and sponsorship activities. This policy also integrates Glencore's long-term strategic objectives in terms of carbon neutrality and circularity.

Through its policy of partnerships, donations and sponsorships, Glencore aspires to be a trusted community partner and to support socio-economic opportunities in host communities. In order to generate sustainable and positive change for all its stakeholders, Glencore seeks to realize the full potential of our social contribution initiatives through strategic and effective management of activities and resources.

Canada's Policy on Partnerships, Donations and Sponsorships contributes to the company's socio-economic commitment, and gives visibility to the positive impacts it generates in host communities and elsewhere in Canada.



Objectives

The Canadian Policy on Partnerships, Donations and Sponsorships aims to support meaningful charitable or industry-specific initiatives in Canada that align with Glencore Canada’s preferred areas of focus, while raising awareness and profile of Glencore in Canada and enhancing its reputation.

Scope

Production sites are responsible for their local donation and sponsorship programs. These are managed locally according to their respective risk analyses and stakeholder engagement plans. The Canadian Policy on Partnerships, Donations and Sponsorships covers matters that do not fall within the scope of local donations and sponsorships programs, such as regional or national partnerships.

Canadian Policy on Partnerships, Donations and Sponsorships	Local donations and sponsorships programs
Stakeholders common to several production sites, whose area of influence/impact is not geographically restricted.	Programs aimed primarily at local stakeholders, located in the production site's area of influence and/or directly impacted by its activities.
Meets Glencore Canada's strategic objectives: IDEAL (Inclusion, Diversity, Equity, Advancement and Local), Indigenous empowerment, education, healthy lifestyles, environment, climate change, energy transition, recycling and circularity, enterprise and job creation.	Programs that meet local strategic objectives affecting neighbouring communities.

Preferred areas of focus

Glencore's social investment strategy flows from its business objectives. The Canadian Policy on Partnerships, Donations and Sponsorships therefore focuses on the following sectors:

Education / Talent acquisition

Glencore is keen to enhance the value of industrial professions and to support the next generation and their promising initiatives. To this end, Glencore Canada aims to develop partnerships with universities, colleges and vocational schools to fund scholarships and innovative student projects linked to engineering, metallurgy, metal recycling, rehabilitation of closed sites, environment, and so on.

Environment / Operating privileges

Glencore operates its production sites in compliance with environmental standards. Glencore Canada aims to prioritize organizations, projects or initiatives related to environmental protection and the reduction of greenhouse gas emissions.

Health & well-being / Health & safety operations

Operating safe facilities, as well as the health and well-being of our employees and the communities in which we operate, is a fundamental value at Glencore. That's why Glencore Canada wants to support organizations and initiatives that promote healthy lifestyles.

Indigenous support / Enterprise

As one of the first signatories in Canada of an Impact and Benefits Agreement with an aboriginal group, Glencore supports initiatives aimed at fostering the development and empowerment of First Peoples, particularly in the fields of education, traditional knowledge and business creation.

Recycling & circularity

Glencore's operations supply, transform and recycle the metals needed for the energy transition. We aim to prioritize organizations, projects or initiatives related to metals recycling and the responsible use of resources.



Eligibility criteria

To be eligible, a project must:

- Be involved in one of the above-mentioned key areas of focus: Education, Environment, Health and Well-being, Indigenous Support, Environment, Recycling and Circularity;
- Align with Glencore Canada’s strategic objectives;
- Maintain or improve Glencore’s relations with communities and stakeholders;
- Raise awareness of Glencore and enhance its reputation.

This list is neither cumulative nor exclusive. Glencore will not support projects, events or organizations in the following cases:

- Requests submitted without sufficient time for review and consideration;
- Activities in provinces or territories where Glencore has no sites in operation or under development;
- Additional requests from organizations to which Glencore has already made a donation in the current year;
- An organization that does not participate in Glencore's compliance review within the required timeframe;
- Organizations that may pose an ethical, cultural, safety or environmental risk, or whose role or actions may conflict with the interests or damage the reputation of Glencore;
- Groups with discriminatory practices according to the grounds identified by the Canadian Human Rights Commission;
- For-profit organizations;
- Political or religious parties and organizations, or interest groups promoting a political or religious ideology, and their financing activities;
- An individual or the realization of a personal project such as a product, an event or an individual activity that has no impact on the community.

Application analysis process

Receipt of request

In order to increase efficiency, requests should be sent directly to the following address: partnerships-partenariats@glencore.ca. Glencore does not consider requests sent by telephone, mail or fax.

Analysis

Requests are analyzed according to the criteria, objectives and rules set out in this policy. The team responsible for donations and sponsorships may, throughout the analysis of the file, request additional information in order to develop its analysis and recommendations. No donation or sponsorship is automatically renewed. Any request for renewal must be the subject of a new online request and a new analysis.

To be eligible, a request must contain the following elements:

- Completed Glencore Canada application form;
- Signed letter/document presenting the project and its alignment with Glencore's areas of focus, as defined in this policy;
- In the case of a partnership or sponsorship, details of planned visibility and communication activities;
- Estimated budget;
- Any other supporting documents.

Answer to the requestor

A reply confirming Glencore's decision is sent to the applicant within 8 to 12 weeks of the date of receipt of the request.

Agreement

Glencore may request partner organizations mention Glencore in their communications and publications. Any logo or visual material developed and used must be consistent with Glencore's corporate identity and must have been approved by Glencore's communications department. Donations or sponsorships in excess of USD 10,000 will be subject to a compliance review and a partnership agreement signed by both parties.

In addition, all third-party payments are subject to Glencore's internal Know Your Counterpart verification process.



Application analysis process (Cont'd)

Agreement (cont'd)

Glencore adheres to ethical and transparent business practices as part of its anti-corruption policy.

- Glencore does not engage in bribery, corruption or facilitation payments. Glencore requires its business partners to adhere to its commitment to responsible and ethical business practices.
- Conducting risk-based due diligence on business partners that present the highest risk to Glencore enables us to identify potential issues or red flags and take steps to manage, monitor and mitigate the risks associated with donation and sponsorship transactions.
- The Third-Party Due Diligence Procedure sets out in detail the process for identifying, assessing, and mitigating compliance risks, as well as the measures Glencore takes with regard to engagement, due diligence and management of third parties.
- Depending on the type of donation or sponsorship, Compliance will perform due diligence on the recipient of the funds, the beneficiaries of the funds, or both.

Follow-up and termination

Glencore reserves the right at any time to evaluate or audit the activities of organizations to which we provide financial support, and to terminate any payment if the recipient organization does not comply with the terms of the agreement. Glencore also reserves the right to request a report on the use of the funds granted, depending on the nature of the agreement, or at the end of the agreement. Glencore reserves the right to terminate a sponsorship agreement with a third-party organization at any time.

Employee volunteer involvement

Glencore values its employees' involvement in their communities. Glencore encourages production sites and local offices to set up a program to promote employee community involvement. For example, when a Glencore employee becomes involved in the activities of a non-profit organization and meets the policy's eligibility criteria, Glencore may make a cash contribution to the organization.

Budget and liability

Management of partnerships, donations and sponsorships is the responsibility of Glencore's Canada Public and Corporate Affairs department, in collaboration, where appropriate, with the production site operations teams.

A specific budget envelope for donations and sponsorships is allocated each year as part of Glencore's budgeting process, in coordination with the product groups active in Canada.

Policy dissemination

This policy is available on the Glencore Canada website.

Communications

Glencore wishes to take a proactive approach in communicating this policy and its activities. These communications may take place on all of Glencore's communications platforms, whether internal or external. These communications aim to:

- Increase the impact and influence of organizations or causes supported by Glencore;
- Increase recognition of Glencore's commitment and involvement in the community;
- Raise public awareness of issues related to preferred social investment sectors.

Contact

If you have any questions about Canada's Partnerships, Donations and Sponsorships Policy, please write to

partnerships-partenariats@glencore.ca

ISSUED BY Glencore Canada
ISSUED ON 15.2.2024
LAST REVIEWED 15.2.2024
VERSION 1.0

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