

GLENCORE

Glencore response to the Dirty Profits

For a number of years, we have had in place a corporate sustainability framework to balance social, environmental, ethical and commercial interests at every level of our group. This framework is called Glencore Corporate Practice (GCP). We designed and implemented GCP to be in line with internationally recognised, sector specific, good practice standards and we continue to monitor its performance to ensure it is fit for purpose. Glencore has been awarded membership of the Dow Jones Sustainability Index, a significant achievement for a newly merged group. This award recognises what we have accomplished to date and encourages us to continue to create value for all our stakeholders.

Our Code of Conduct is an important part of the GCP and sets out our corporate values and provides clear guidance to our employees about how we do business. Our position on the issues of bribery and corruption is clear: offering, paying, authorising, soliciting or accepting bribes is unacceptable to Glencore. In addition, we will not assist any third party in breaching the law in any country or participate in any other criminal, fraudulent or corrupt practice.

We work proactively to maximise shareholder value while operating in accordance with the law. Glencore is committed to full compliance with all our statutory obligations.

We believe that our global presence and economic strength have a predominantly positive impact on the communities in which we operate. We undertake and contribute to activities and programmes designed to improve quality of life for the people in these communities. Glencore is also a significant investor in the sustainable development of these communities, spending over USD\$200million in the last financial year, a sum equivalent to 3.6% of the group's net income.

Glencore is a major investor in the developing world. We believe developing countries need more investment, not less. Investment provides jobs, education, access to healthcare and improved infrastructure.

We believe continued investment helps to improve the socio-economic climate of surrounding areas through increased employment opportunities which will result in further uplift of the local communities and provide another catalyst to the local economy.

We respond below to certain of the key allegations made.

Allegation of human rights violation in the Philippines

The region in the Philippines where our Tampakan copper-gold project is located has a long and complex history of violence associated with traditional customs, clan rivalries, religious and political insurgencies and internationally recognised terrorist groups. We do not condone violence in any form and we actively promote and support a peaceful approach to conflict resolution that upholds human rights and respects national laws and regulations.

Since assuming management control of the Tampakan project in 2007, we have been working with local stakeholders on a range of initiatives to reduce violent conflict and enhance security in the area and to find durable solutions to the long-term law and order issues affecting communities in the region.

We have formally adopted the Voluntary Principles on Security and Human Rights (VPSHR) at our Tampakan project which we use to guide our management of security risks, the use of private security service providers, and our interactions with public security agencies and local communities. We have been providing awareness training on the VPSHR to our employees, security service personnel and

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external stakeholders, including the Armed Forces of the Philippines (AFP) and Philippine National Police (PNP), since 2009.

We have in place clear Memoranda of Agreement with the Local Government Units, through which we offer financial support to the military, as requested by the local community. The MoAs are of short duration, typically six months, to allow for regular review and reassessment. During the last review, following the incidents in the summer, it was agreed that we will no longer provide financial support to the Philippine military, as of November 2013.

Further details can be found on Page 31 of our Sustainability Report 2012 which can be found on our website.

Allegation of human rights violation in Peru

We deeply regret that the protests that took place in 2012 in Espinar escalated into violence in which over 50 protestors and police were injured and in which three people tragically lost their lives. Despite our attempts to maintain a dialogue with the communities and reach a peaceful solution and the national government's prior agreement to conduct further intensive joint environmental monitoring in the province, the protests went ahead.

During the protests, we were highly concerned for the safety of our employees and contractors in the region and of the local communities of Espinar. We do not condone violence of any kind and we are committed to respecting the human rights of our employees and community members in the region.

With regard to Xstrata Tintaya, we are committed to engaging in constructive two-way dialogue with all our stakeholders and we respect their rights to voice their concerns regarding the project in a non-violent way. We have in no way acted to prevent demonstrations taking place at our operations.

We have implemented the Voluntary Principles at our Peruvian operations and human rights training has been undertaken by all leaders and management of the private security contractors used in our projects and operations. We have also engaged with representatives of the Peruvian police force in neighbouring areas to provide them with information about our approach to human rights, including basic training.

Our commitment to open engagement remains unchanged by these events. The strong support we have received from the rural communities in our area of influence encourages us that there is a place for responsible mining in Peru and that we can continue contributing to the sustainable development of Espinar province through open and constructive partnerships with local government, institutions and communities.

Allegation of historical profiteering through trading with Iran

Glencore complies with applicable laws and regulations, including applicable sanctions. We are closely monitoring all new legal developments to ensure that we continue to be in compliance with applicable laws and regulations, including applicable sanctions.

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European Investment Bank

In 2005 the European Investment Bank signed a Finance Contract with Mopani for an amount of \$50 million to partially fund the rehabilitation of the Mufulira smelter. The European Investment Bank has informed the European Anti-Fraud Office (OLAF) and launched its own investigation about the tax allegations made in Zambia against Mopani. Discussions continue with the EIB on this matter. In the meantime the loan has been repaid.

Mopani

Mopani has paid \$555.3 million in taxes, royalties and other dues to Government since privatisation. Taxes, royalties and other dues to Government as declared include Pay As You Earn (PAYE), Mineral Royalties and Import Customs & Exercise Duty. Mopani also pays Import VAT & Reverse VAT as well as property rates on a monthly basis. From April 2012, the royalty tax that companies extracting base metals, including copper, pay to the government doubled from 3% to 6%. The royalty is calculated using the London Metal Exchange copper and cobalt prices and is based on revenue rather than profits

In February 2011 a draft provisional report prepared by advisers to the Zambia Revenue Authority was unofficially circulated in Zambia. The report was described as “confidential, preliminary and an incomplete draft” by the Zambia Revenue Authority.

The draft provisional report contained fundamental factual errors and both Mopani and Glencore have publicly refuted its ‘conclusions’ on numerous occasions.

The most fundamental flaw incorporated by the authors of the report was the inclusion of toll treated material in the volumes used to calculate Mopani’s average sales price. Ownership of the toll material does not transfer to Mopani which only receives a treatment and refining charge and returns the final product of copper cathode to the contracted third party.

Dismissal of workers in South Africa

We do not tolerate any kind of harassment or discrimination. We aim to treat everyone fairly, respectfully and with dignity. Our approach to labour relations is that we try and be as consultative as possible recognizing that we must always act in accordance with prevailing labour relations legislation.

During May 2013 three unprotected strikes took place at our Eastern Mines, which were illegal in terms of current South African labour legislation. Due process was followed resulting in the dismissal of those who participated in such strikes.

Dominican Republic

The Loma Miranda ore resource and reserve calculation were carried out in accordance with NI 43-101 Canadian Institute of Mining standards. As a result, the allegations made towards Glencore are simply not true.

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