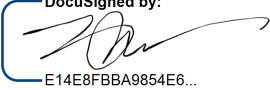


POLICY

Community Policy

Sudbury Operations

Approval			
Name	Role	Signature	Date
Zachary Mayer	Vice President, Sudbury Integrated Nickel Operations, a Glencore Company	 E14E8FBB A9854E6...	4/30/2026

1 Introduction

The purpose of the Community Policy is to build and sustain trust with our stakeholders and communities of interest by promoting ethical, responsible business consistent with our Code of Conduct. The policy is aligned with our Social Performance Standard, Cultural Heritage Standard, Social Contribution Framework and our Health, Safety, Environment (HSEC) and Human Rights policies and standards.

2 Who does this apply to?

This policy applies to all employees, directors and officers, as well as contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore plc worldwide.

We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy. This Policy is applicable relevant to employees engaged and communicate with our stakeholders and communities of interest.

3 What is our commitment?

Sudbury Integrated Nickel Operations is committed to upholding the highest standard of social responsibility by contributing to the social, economic and institutional development of the communities in which we operate.

Our community engagement approach is built upon open and transparent dialogue with stakeholders and communities of interest supported by effective consultation processes and clear, consistent communication.

We respect the rights, interests, perspectives and aspirations of Indigenous Peoples and acknowledge their right to maintain their culture, identity, traditions and customs.

We aim to avoid harm to people from our activities, respect human rights, contribute to social and economic development of affected people.

As a member of the communities where we operate, we work in partnership with government, local authorities, community representatives, academia, non-governmental organizations (NGOs) to share knowledge, build capacity and contribute to enduring and economic outcomes.

We will:

- Establish fair and equitable processes for engagement with relevant Indigenous groups and local communities as outlined in our Stakeholder Engagement Plan and Agreements
- Respect the human rights of our workforce, communities and other stakeholders
- Communicate and report regularly on our performance regarding economic, health, safety, environment and community targets and objectives

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SUDBURY
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- Support sustainable community initiatives that are aligned with Glencore’s Values and Code of Conduct
- Support economic development by providing local employment, procurement and contracting opportunities to local enterprises.
- Record, investigate and respond to community concerns in a proactive, timely and professional manner

4 Speaking Openly

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of the Code of Conduct and this policy with their manager, supervisor or via other available reporting channels. Our Raising Concerns platform is available to employees, contractors, and external parties. Glencore takes concerns seriously and manages them promptly.

Glencore has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal, or not in line with our Code of Conduct and policies, even if the concern isn’t substantiated, if they have not knowingly made a false report.

5 Consequences

Our policies support our Values and Code of Conduct and reflect what is important to us. We take breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

6 Revision History

Revision No.	Date	Section & Page(s)	Purpose of the Modification	Modified by:
14	April 15, 2026	All	Annual Review, update to DMS standard with updated document number	Irene Gaudet