

GLENCORE

Action Plan

Performance Report for Glencore's Port of Quebec Facilities

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1. Introduction

Quebec’s Ministère de l’Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs (MELCCFP) requires Glencore’s Port of Quebec facilities to perform a third-party performance audit of the port operations as a requirement of an order that was issued to Glencore on October 22, 2024.

The Performance Report (document # 108570-GX-00000-17162-001), submitted to the MELCCFP on April 20, 2025, presents the observations and findings of the performance audit carried out at Glencore’s Port of Quebec facilities by Ausenco Engineering Canada ULC, an external firm. The report also includes an assessment of the equipment used by Glencore for all its operations, including shiploading, material handling (conveyors and dust collectors), rail loading and unloading operations, and dust containment and collection systems during shiploading. This assessment also compares Glencore’s equipment with other marine handling equipment available on the market.

In addition to the Performance Report, the MELCCFP requires Glencore to implement an action plan in light of the results of the performance audit. The wording from the Ministère specifies the following:

- *Submit (...) no later than 90 days following the submission of the performance report, an action plan to maintain in good working order and make optimal use of the equipment that is part of the chain aimed at reducing the release of contaminants into the environment, taking into account the results of the performance report and based on best practices (...).*
[Translation]

This report provides recommendations based on the findings of the performance audit and is hereinafter referred to as the “Action Plan.”

2. Summary of audit findings

The performance audit assessed Glencore's facilities, dividing them into distinct areas based on the activities carried out in each one. Each area was assessed using two criteria and given a score out of 5, based on on-site observations, documentation review, personnel interviews and the auditor's knowledge of similar operations.

Overall performance

The results of the audit confirm that the performance of the equipment is commensurate with Glencore's ongoing efforts at the port since 2013:

- **Overall score of 4.45 out of 5:** Our overall performance is described as achieving a high level of operational performance that meets or exceeds technical best practice. With all the investments we have made over the last few years, the external audit confirms that we are on the right track: our practices now exceed current industry standards.
- **Score of 4.35 out of 5 for maritime best practice:** Our average of 4.35 out of 5 puts us well above the usual average of 2 to 3 for similar operations, according to the auditors' comparisons.

Matte loading

Although the matte loading system is supported by older infrastructure, it still **scored 3 out of 5**. This score, which exceeds the average for comparable facilities, reflects the many improvements that have been made:

- **Equipment modernization:** The ship loader's spout was modified to incorporate a dust collection and misting system. According to the audit, these changes led to a significant improvement in environmental performance.
- **Exemplary maintenance:** A rigorous maintenance strategy is in place, including a structured program of daily, weekly, monthly and annual inspections and preventive repairs.
- **Multidisciplinary expertise:** Work is carried out by qualified electrical, mechanical, non-destructive testing (NDT) and structural specialists.
- **External controls and regulatory compliance:** A structural audit is conducted annually, on top of the T2 audit performed every five years by Transport Canada. The T2 audit assesses the compliance of external partners (railways, airlines, third-party service providers) with strict federal standards.

These control mechanisms help ensure ongoing compliance and support the progressive improvement of practices.

The results of the audit show that Glencore’s facilities scored highly, both when assessed against their own operational requirements and when compared with similar facilities in Canada and around the world. This performance is part of Glencore’s commitment to maintaining its environmental certifications (ISO 14001, Green Alliance), carrying out regular audits and, where justified and feasible, investing in the highest-performing technologies available.

3. Action Plan

Glencore’s performance audit score was above average. However, room for improvement has been identified in certain areas, which will enable us to further increase our overall performance. Some current practices could also be optimized in order to better support our environmental performance objectives.

The following table presents a list of actions to be taken to improve Glencore’s methods, following the recommendations of the performance audit.

These actions are designed to consolidate already effective practices and to target areas identified for improvement, based on a structured continuous improvement approach. Together, they constitute a concrete work plan that will be used to boost operational performance and maintain a high level of compliance with recognized environmental standards.

No.	Action	Description	Ref.	Deadline
1	Update standard operating procedures (SOPs)	<p>a. Update dust monitoring procedure QC-EN-SOP-017 to include updated monitoring terminology.</p> <p>b. Update dust monitoring procedure QC-EN-SOP-017 to include new real-time nickel monitors and action plans for exceeded action thresholds.</p>	4.2.6	<p>Aug. 31, 2025</p> <p>Oct. 31, 2025</p>
2	Review Shed 51C operations	<p>a. Create a new standard operating procedure (SOP) for storage activities in Shed 51C, specifying cleaning activities as well as roles and responsibilities.</p> <p>b. Train operators on the new SOP.</p> <p>c. Implement the new SOP in daily operations.</p> <p>d. Verify and document compliance with the new procedures after implementation.</p>	4.2.7	<p>Sep. 30, 2025</p> <p>Oct. 31, 2025</p> <p>Dec. 31, 2025</p> <p>Mar. 31, 2026</p>

No.	Action	Description	Ref.	Deadline
		<p>Note: Changes implemented in recent months:</p> <ul style="list-style-type: none"> • 80% of salvaged product has been transferred to Shed 51 in large bags, and the remaining 20%, still in bulk form, will be transferred by September 2025. • All recovered product from cleaning activities is now stored in a large industrial bag or diverted directly into the process, provided it meets the required criteria. • The mobile industrial vacuum stores salvaged product directly in a large industrial bag rather than in a salvage bin. This method is currently being tested. • The shed is currently being cleaned and reorganized to optimize storage of the large industrial bags used to hold nickel concentrate and matte. • A holding tank is used to transport large bags from the vessel to Shed 51 to minimize the risk of spills during transport. 		
3	Documented continuous improvement	<p>Continue to engage in documented continuous improvement processes, including:</p> <ul style="list-style-type: none"> • Maintaining Green Alliance certification. Our terminal operations must maintain a minimum Level 3 performance on each of the seven applicable indicators. • Maintaining ISO 14001 certification. <ul style="list-style-type: none"> a. Ensure that the environmental management system complies with the ISO 14001 standard. b. Conduct an external monitoring audit of port operations to confirm the environmental management system's compliance with the ISO 14001 standard. <p>The actions of the audit are tracked through our Opportunities for Improvement (OFI) process and are included in the overall external audit process linked to the ISO 14001 standard.</p>	N/A	<p>Aug. 26–27, 2025</p> <p>Nov. 7, 2025</p>
4	Nickel matte loading	Analyze at-the-source removal of the particulate contained in matte from the smelter by assessing the technical and operational feasibility of capturing it at the	N/A	Dec. 31, 2025

No.	Action	Description	Ref.	Deadline
		venting points of the loading hoppers at the smelter.		
5	Nickel matte loading	Modify the water spray circuit on the three nickel matte conveyors at the port by adding a booster pump to optimize product moisture up to the 2% operational limit.	N/A	Nov. 30, 2025